

# 2008 Santa Barbara County Regional Transportation Plan

## Final Environmental Impact Report Comments, Responses and Revisions

*State Clearinghouse No. 2004081136*

*Prepared for:*

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Association of Governments**  
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**September 2008**

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**Final**  
**Environmental Impact Report**  
**Comments, Responses and Revisions**  
*for the*  
**2008 Santa Barbara County Association of**  
**Governments**  
**Regional Transportation Plan (RTP)**

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*Final*  
Santa Barbara County 2008 RTP EIR  
Comments, Responses and Revisions

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# FINAL EIR COMMENTS, RESPONSES and REVISIONS

## 1.0 INTRODUCTION

In accordance with Section 15088 of the California Environmental Quality Act Guidelines, the Santa Barbara County Association of Governments, as the lead agency, has reviewed the comments received on the Draft Environmental Impact Report (DEIR) for the 2008 Regional Transportation Plan (RTP) Update EIR and has prepared written responses to the written comments received. The DEIR was circulated for a 45-day public review period that began July 18, 2008 and concluded on September 2, 2008. The comment letters included herein were submitted by public agencies, private organizations, and private citizens.

Each comment that SBCAG received is included in this section. Responses to these comments have been prepared to address the environmental concerns raised by the commentors and to indicate where and how the EIR addresses pertinent environmental issues.

The Draft EIR and this Comments and Responses document collectively comprise the Final EIR for the 2008 RTP Update EIR. Any changes made to the text of the Draft EIR correcting information, data or intent, other than minor typographical corrections or minor working changes, are noted in the Final EIR as changes from the Draft EIR.

The comment letters have been numbered sequentially, and each issue within a comment letter, if more than one, has a letter assigned to it. Each comment letter is reproduced in its entirety with the issues of concern lettered in the right margin. References to the responses to comments identify first the letter number, and second, the lettered comment. Letters are numbered by the type of organization from which they were sent (state, regional, county, local), by organization, or by individual (S.1-2, for example, would reference the second issue of concern within the first letter received from a state agency).

The focus of the responses to comment is the disposition of environmental issues that are raised in the comments, as specified by Section 15088 (b) of the State CEQA Guidelines. Detailed responses are not provided to comments on the merits of the proposed project. However, when a comment is not directed to an environmental issue, the response indicates that responses to comments on the RTP are addressed by SBCAG staff and that all comments will be considered by the SBCAG board.

## 2.0 REVISIONS TO THE DRAFT EIR

This section presents clarification and modifications to information contained in the Draft EIR, based on the comments and responses presented in Section 3.0 of this report in addition to revisions identified by SBCAG. Additions are noted in bold (**bold**) where text is added and deletions are strike-through (~~strike-through~~) type.

Executive Summary page ES-1, bulleted list has been revised to merge two bullets (5<sup>th</sup> and 6<sup>th</sup>) into one bullet:



- Identification of needed transportation improvements, in sufficient detail, to serve as a foundation for the: (a) Development of the Federal Transportation Improvement Program (FTIP), and the Interregional Transportation Improvement Program (ITIP), (b) Facilitation of the National Environmental Protection Act (NEPA)/404 integration process and (c) Identification of project purpose and need.

Executive Summary page ES-2 has been revised to include the following text:

**“Agencies and personnel consulted pursuant to SAFETEA-LU included the Santa Barbara Air Pollution Control District; California Department of Fish & Game; the California Environmental Protection Agency; Michelle Messinger with the California Office of Historic Preservation (July 10, 2008); the Santa Barbara Agricultural Commissioner’s Office; the Santa Barbara County Planning and Development Department; Santa Barbara County Resource Management Department; the United States Department of Agriculture; and the United States Environmental Protection Agency.”**

Executive Summary page ES-28 has been revised to remove project L-2 and its information from Table ES-2, Summary of 2008 RTP Project Impacts.

Executive Summary page ES-33 has been revised to remove project MTD-PL-3 and its information from Table ES-2, Summary of 2008 RTP Project Impacts.

Section 2.0, *Project Description*, Tables 2-1 through 2-6 have been revised as follows:

Delete the fourth column “Programming/Planning Document or Funding Source”.

Section 2.0, *Project Description* page 2-1, bulleted list on of has been revised to merge two bullets (5<sup>th</sup> and 6<sup>th</sup>) into one bullet:

- Identification of needed transportation improvements, in sufficient detail, to serve as a foundation for the: (a) Development of the Federal Transportation Improvement Program (FTIP), and the Interregional Transportation Improvement Program (ITIP), (b) Facilitation of the National Environmental Protection Act (NEPA)/404 integration process and (c) Identification of project purpose and need.

Section 2.0, *Project Description*, page 2-2, second full paragraph, has been revised as follows:

“Tables 2-1 and 2-2 list new program and plan roadway and bikeway improvements proposed in the 2008 RTP Update. The locations of new program or plan road and bikeway improvements are shown on Figures 2-2 through 2-9. The public works department of each jurisdiction proposed projects for the state highway or local roadway system within its jurisdiction. These projects address current and future roadway needs based on existing traffic conditions and projected traffic increases anticipated based on the growth accommodated in the jurisdiction's land use plans. In compiling this list, projects within each jurisdiction (the state, the county, and the cities) were prioritized by order of importance **or year of construction** based on the jurisdiction's input.”

Section 2.0, *Project Description* page 2-21 has been revised as follows:



It should be noted that several of the program and plan RTP projects would be funded in whole or in part by the renewal of Measure A (Measure A is the successor to Measure D and is scheduled for voter consideration in November 2008). The projects within Measure A are also contained within the 2008 RTP funds.

Section 2.0, *Project Description* page 2-34 under the heading “2.5 PROJECT APPROVALS” has been modified to include the following:

“• **California Public Utilities Commission’s Rail Crossings Engineering Section (RCES)**”

Section 4.1, *Transportation and Circulation*, Table 4.1-6, has been revised as follows:

**Table 4.1-6  
 Year 2030 P.M. Peak Hour LOS on U.S. 101 Northbound  
 Between Goleta and Santa Maria**

Segment	Distance (miles)	2030 No-Build LOS	2030 Programmed LOS	2030 Planned LOS
Hollister Ave.- Las Cuces/Rte. 1	21.9	E	E-F	E
<b>Clark Ave – Santa Maria Way</b>	<b>2.2</b>	<b>D</b>	<b>E</b>	<b>E</b>

Section 4.2, *Land Use*, Mitigation Measures, on page 4.2-7 of the Draft EIR, has been revised to include the following additional mitigation measure:

**“LU-4(c) When new roadway extensions are planned in areas that contain sensitive farmland, the local jurisdiction in which the RTP project is located shall assure that project-specific environmental reviews consider the use of agricultural conservation easements on land of at least equal quality and size as compensation for the loss of agricultural land. Agricultural conservation easements could be implemented by directly purchasing easements or donating mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. ”**

Section 4.4, *Noise*, page 4.4-4, 5<sup>th</sup> full paragraph, has been revised as follows:

“AMTRAK provides intercity passenger rail service through the county. **According to the LOSSAN North Strategic Plan (December 2007), ten** ~~Twelve~~ trains per day operate between **Los Angeles and Santa Barbara Oxnard and Goleta**, while **four** ~~ten~~ trains per day operate between Santa Barbara Goleta and San Luis Obispo. ~~These totals include the intercity Coast Starlight, which operates once daily in each direction (Amtrak Train Schedule, October 2007).~~”



Section 4.6, *Water Resources*, 5<sup>th</sup> and 6<sup>th</sup> full paragraphs on page 4.6-4, have been revised as follows:

“According to the County’s Groundwater Thresholds Manual, an acre of groundcover, shrubs and trees requires between 1.5 and 1.8 acre-feet of water per year. Although the increase in landscaped areas resulting from **individual** RTP projects cannot be precisely estimated, it can be assumed that watering demands **increases of such areas** in locations with overdrafted groundwater basins would occur. Several major RTP projects are located in areas served by the Santa Maria, Lompoc, Santa Ynez, San Antonio, and Cuyama Basins, all of which are in a state of overdraft. Although several of the major urbanized areas throughout the county currently use reclaimed water for transportation facility landscaping, in more remote areas reclaimed water sources are not located within a reasonable distance. As such, it may not be economically feasible to convey reclaimed water to outlying areas. **In such instances, lead agencies for individual RTP projects will need to consider and, as necessary, mitigate potential water supply impacts as part of future project-specific environmental reviews.**”

Major RTP projects, particularly roadway extensions, could also affect groundwater supplies by incrementally reducing groundwater recharge potential. This reduction in groundwater recharge could occur because the impermeable surfaces associated with the proposed improvements would increase surface water runoff at the expense of natural infiltration. ~~While~~ **The magnitude significance of such an impacts associated with individual RTP projects cannot be accurately determined at this programmatic stage of analysis; nevertheless,** given the overdrafted nature of some of the county’s groundwater basins, the reduction in groundwater recharge is considered to be potentially significant. **The lead agencies for individual RTP projects will need to consider potential groundwater recharge impacts as part of future project-specific environmental reviews.”**

Section 4.6, *Water Resources*, page 4.6-4 through 4.6-5, Mitigation Measures W-1(b) and W-2(a) have been revised as follows:

**W-1(b)** The local jurisdiction in which a particular RTP project is located shall ensure that low water use landscaping (i.e., drought tolerant plants and drip irrigation) is installed. **When feasible, native plant species shall be used.** This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.

**W-2(a)** The local jurisdiction in which a particular RTP project is located shall ensure that fertilizer/pesticide application plans for any new right-of-way landscaping are prepared to minimize deep percolation of contaminants. **The plans shall specify the use of products that are safe for use in and around aquatic environments.** This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.”

Section 4.11, *Biological Resources*, 1<sup>st</sup> full paragraph on page 4.11-6, has been revised as follows:

~~“Local state fish and game agencies must also be consulted regarding the issuance of Section 404 permits.~~ The California Department of Fish and Game (CDFG) is considered a trustee



agency under CEQA with the responsibility of protecting the biological resources of California. The CDFG also has authority under Section 1600 et. Seq. of the Fish and Game Code to reach an agreement regarding conservation of fish and wildlife resources whenever a project alters the natural flow or bed, channel, or bank of any river, stream, or lake.”

Section 4.11, *Biological Resources*, page 4.11-6, the following is added as the seventh and eighth paragraphs under “Regulatory Setting” in Section 4.11:

**“Section 156.3 of the California Streets and Highways Code requires assessment and remediation of potential barriers to fish passage for transportation projects using state or federal transportation funds. Such assessments must be conducted for any projects that involve stream crossings or other alterations and must be submitted to the CDFG.**

**Take of fully-protected birds, mammals, reptiles, amphibians, and fishes is prohibited by state law. Avoidance measures must be incorporated into the design, specifications, and operation of individual projects in order to avoid take of fully-protected species.”**

Section 4.11, *Biological Resources*, Impact B-2 is revised to read as follows:

**“Impact B-2** Some proposed transportation projects could permanently alter natural habitat areas, and wildlife corridors, **and special status plant and animal species**. Impacts of many individual projects can likely be mitigated to a less than significant level. However, because the feasibility of mitigation cannot be determined at this time, the cumulative effect of RTP implementation is considered Class I, significant and unavoidable.”

Section 4.11, *Biological Resources*, page 4.11-12, the second paragraph under Impact B-2 is revised to read as follows:

“Several individual projects would, however, increase human activity in areas where significant biological resources could occur. In particular, several of the proposed bikeway projects in the Gaviota, Goleta, Santa Maria, and Carpinteria areas could increase human activity in the vicinity of riparian areas, wildlife corridors, and potentially sensitive coastal habitats. **These types of habitats may be inhabited by a range of special status plant and animal species, as illustrated on Figure 4.11-1.** In addition, several of the proposed new roads and road widenings in the Santa Maria/Orcutt area could involve removal of various tree species and grasslands. Though proposed road projects would not necessarily create significant impacts to biological resources, the introduction of more human activity into potentially sensitive areas would increase the potential for **both temporary (construction) long-term** conflicts with sensitive plant and wildlife species. **Impacts could result from direct habitat removal, increased deposition of atmospheric pollutants, and/or introduction of invasive nonnative plant species into currently undisturbed natural areas.** The significance of potential impacts would need to be addressed on a case-by-case basis through site-specific studies as individual projects are developed. Though it appears likely that impacts could be mitigated through careful site planning and post-construction restoration, impacts are considered potentially unavoidable.”

Section 4.11, *Biological Resources*, page 4.11-12, the following paragraph is added at the end of the discussion under Impact B-2:



**“Project-specific and cumulative analysis will be needed for individual RTP projects with the potential to disrupt wildlife movement. This analysis will need to consider both temporary impacts relating to construction activity and long-term impacts relating to the operation and maintenance of individual projects.”**

Section 4.11, *Biological Resources* Figure 4.11-7 has been revised to revise the following text in the Legend on the left:

“Go-PL-4-1”

Section 4.12, *Energy*, Impact E-1, has been revised as follows:

**“Impact E-1 Energy consuming equipment and processes which will be used during construction and maintenance of RTP projects would require the use of energy. However, it is not anticipated that energy would be consumed in a wasteful or unnecessary manner. Therefore, such impacts would be Class III, less than significant. ~~It, significant but mitigable.~~”**

**Construction and maintenance** Implementation of the proposed RTP projects would result in both short-term and long-term **consumption of energy due to the use of construction equipment and processes.** ~~impacts to the county’s energy supply.~~ During construction activities, energy would be needed to operate construction equipment. In addition, construction materials require energy to be made and would likely be used in projects that involve new construction or replacement of older materials. **However, such construction and maintenance activities would be undertaken only as necessary and, as such, would not involve any wasteful consumption of energy. Therefore, impacts to energy due to construction and maintenance of RTP projects would be less than significant.**

**Mitigation Measures.** ~~Although RTP project construction and maintenance is not expected to involve the wasteful or unnecessary consumption of energy,~~ the following mitigation measures are recommended to **reduce** ~~address potential impacts to energy consumption to the maximum degree feasible~~ ~~supplies:~~

- E-1(a)** Use alternatively fueled construction equipment, where feasible, such as natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.
- E-1(b)** Recycled construction materials shall be used whenever feasible.
- E-1(c)** Waste materials from construction or demolition shall be recycled whenever feasible. Materials that can be recycled include but are not limited to asphalt, concrete, brick, lumber, gypsum wallboard (drywall), cardboard and other packaging, roofing material, ceramic tile, carpeting, plastic pipe and steel. Asphalt removed from roads and paved structures shall be recycled.



**Significance After Mitigation.** Impacts would be less than significant without mitigation. Implementation of the above measures would further reduce energy consumption. ~~potential impacts to a less than significant level.~~

Section 4.12, *Energy*, Impact E-2, has been revised as follows:

**“Impact E-2** The operation of some RTP projects may increase energy demand. However, in a general sense, RTP implementation would increase the efficiency of the County’s transportation system and increase opportunities to use alternative transportation modes that reduce energy consumption. As such, this impact would be Class III, less than significant. This impact is considered Class II, significant but mitigable.

Construction and expansion of transportation facilities throughout the county may generate additional energy demand. Some highway and roadway improvements will increase vehicle capacity, allowing a greater number of vehicles to use the facilities. However, increasing capacity and making roadway and intersection improvements will increase the transportation system efficiency, in turn, increasing fuel combustion efficiency in vehicles. **In addition, many RTP projects (e.g., bikeway and pedestrian projects, rail projects, transit projects, and TDM projects) would improve the availability of alternative transportation modes in the County. Generally, the availability of these alternative modes would be expected to reduce overall motor vehicular trips, vehicle miles traveled, and associated energy consumption. It is not anticipated that implementation of individual RTP projects would induce the wasteful or unnecessary consumption of energy. Therefore, impacts would be less than significant.**

New facilities that require energy for operation, such as buildings, signal lighting, changeable message signs, roadway or parking lot lighting, and electronic equipment will increase energy demand. New landscaping irrigation also increases energy demand through water pumping and treatment. **However, energy consumption is not anticipated to be wasteful or unnecessary as it is anticipated that all lighting, signage, and irrigation systems would be comply with applicable energy efficiency requirements. Therefore, impacts relating to these systems would be less than significant.**

Mitigation Measures. The RTP proposes many projects that will provide greater opportunity for county residents and visitors to use alternatives to single occupancy vehicle trips for transportation and reduce the demand for energy used in transportation. The proposed RTP also includes policies that encourage land use planning that encourages walking, biking, and transit use. In addition, the following mitigation measures are ~~required~~ **recommended** to reduce potential impacts to energy:

**E-2(a)** New facilities shall be designed with energy-efficient equipment and passive solar design (e.g., orientation of building to maximize natural heating and cooling, solar water heating, use of daylighting, and placement of trees to aid passive cooling, protection from prevailing winds, and maximum year-round solar access), provided that additional capital costs are offset by estimated



energy savings during the first 5 years of operation. Other improvements with longer payback periods should be considered.

**E-2(b)** All lighting shall be energy efficient and designed to use the least amount of energy to serve the purpose of the lighting. Lighting shall utilize solar energy wherever feasible.

**E-2(c)** New landscaping design and irrigation systems shall be water efficient.

Significance After Mitigation. **Impacts would be less than significant without mitigation.** Implementation of the above measures would **further** reduce **countywide energy consumption** potential impacts to a less than significant level."

Section 6.0, *Alternatives* page 6-5 of has been revised to remove project L-2 and its information from Table 6-2, RTP Projects Eliminated Under the Modified Project Alternative.

Section 4.3, *Air Quality*, has been comprehensively revised. The revised section is included in its entirety on the following pages.

## 4.3 AIR QUALITY

This section analyzes the impacts of the 2008 RTP upon local and regional air quality. Both temporary impacts relating to construction activity and long-term impacts associated with population growth and associated growth in vehicle traffic and energy consumption are discussed. This section is based on the technical air quality analysis prepared by SBCAG and included in Appendix C of this EIR.

### 4.3.1 Setting

**a. Local Climate and Meteorology.** Air quality is affected by the rate and location of pollutant emissions and by climatic conditions that influence the movement and dispersion of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local and regional topography, provide the links between air pollutant emissions and air quality.

The Santa Ynez Mountains separate Santa Barbara County into two regions, South County and North County, by acting as a partial barrier to the exchange of air between these two regions. The County has a Mediterranean climate characterized by warm, dry summers, and cooler, relatively damp winters. Mild temperatures occur throughout the year, particularly near the coastline. Maximum summer temperatures average 70 degrees Fahrenheit near the coast and in the high 80s to low 90s inland. During winter, average minimum temperatures range from the 40s along the coast to the 30s inland.

Although precipitation is confined primarily to the winter months, occasional, tropical air masses result in rainfall during summer months. Annual rainfall amounts range from about 10 to 18 inches along the coast, with more substantial amounts in the higher elevations. Sunny skies are common throughout most of the area. However, low clouds and fog occur with some frequency over the ocean and adjacent coastal areas during late spring and summer which generally disperse by midday. In general, there are 60 to 80 days per year which would be categorized as cloudy.

Wind speed and direction play a major role in determining the areas most affected by air pollution. In areas where a single prevailing wind direction dominates, pollutants emitted in that area are transported away from their source. This may result in low concentrations in the source areas but can potentially cause high concentrations in downwind areas, especially ozone which takes time to form. Wind speeds also play a role in dispersion. High wind speeds cause pollutants to disperse over wide areas, generally lowering concentrations. Conversely, low wind speeds are generally associated with higher concentrations. In North County, the sea breeze is typically northwesterly throughout the year. At night, the sea breeze dies, as air adjacent to the surface cools, it descends down the coastal mountains and mountain valleys, resulting in light land breezes. The alternation of the land-sea breeze cycle can sometimes produce a "sloshing" effect, where pollutants are swept offshore at night and subsequently carried back onshore during the day. This effect is exacerbated during periods when wind speeds are low.



Another key factor that affects the concentrations of pollutants in the air is the stability of the atmosphere. Restricted mixing and low wind speeds are generally associated with higher pollutant concentrations. These conditions are typically related to temperature inversions (temperature increase with height) which cap the pollutants that are emitted below or within them. During the months May to October, it is common for an inversion layer to form, with an average height of 1,500 feet above the ground surface. Year-around, light onshore winds hamper the scattering of primary pollutants and the orientation of the inland mountain ranges interrupts air circulation patterns. Pollutants become trapped, creating ideal conditions for the production of secondary pollutants (e.g., ozone, particulates, etc.). Because poor air quality is often associated with air stagnation, it is reasonable to expect a higher frequency of pollution events in the southern portion of the County where light winds are frequently observed, as opposed to the North County where the prevailing winds are strong and persistent.

**b. Pollutants.** Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include carbon monoxide (CO), reactive organic gases (ROG), nitric oxide (NO), fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). Secondary criteria pollutants are created by atmospheric chemical and photochemical reactions; reactive organic compounds (ROC) together with nitrogen oxides form the building blocks for the creation of photochemical (secondary) pollutants. Secondary pollutants include oxidants, ozone (O<sub>3</sub>) and sulfate and nitrate particulates (smog). The characteristics, sources and effects of critical air contaminants are provided in Table 4.3-1 on the following page.

Santa Barbara County contains a wide variety of emission sources including stationary, area-wide, on-road vehicles, and other mobile sources (2007 CAP). The Santa Barbara County Air Pollution Control District (APCD) has developed a “planning inventory” which focuses on emission sources which can be controlled and reflects emission patterns found during episodic periods (e.g., summer months for ozone). Based on the 2002 county-wide average daily “planning” emissions inventory (SBCAPCD, 2007 CAP), on-road motor vehicles emit the greatest quantities of anthropogenic NO<sub>x</sub> (46%) and 33% of anthropogenic ROC.

**In 1998, the California Air Resources Board identified particulate matter from diesel fueled engines as a toxic air contaminant. Diesel particulates are emitted directly by diesel powered motor vehicles, and are typically in the form of PM<sub>2.5</sub>.** The majority of PM<sub>10</sub> emissions in Santa Barbara County – of which approximately 1/3 is comprised of PM<sub>2.5</sub> – comes from background non-anthropogenic sources (e.g., sea salt, wind blown dust) Figure 4.3-1 breaks down the annual PM<sub>10</sub> sources.

Normalizing for background, vehicle exhaust represents approximately 2-3 percent of the PM<sub>10</sub>/PM<sub>2.5</sub> inventory. However, re-entrained road dust created by on-road vehicles makes up 17 percent of the PM<sub>10</sub> inventory and 5 percent of the PM<sub>2.5</sub> (APCD, SB 656 Report, 2006). **While not considered a criteria pollutant, per se, greenhouse gases are considered to be any anthropogenic source that can contribute to global warming. The “Greenhouse Effect” refers to the Earth’s ability to capture heat absorbed from the sun and the Earth’s surface. Solar radiation from the sun passes through the atmosphere, 30% of which is immediately reflected back out into space. The other 70% is radiated back from the earth and absorbed by greenhouse gas chemicals, such as carbon dioxide, which leads to a subsequent warming effect underneath the atmosphere. This is a natural cycle that provides an average**



temperature of approximately 60 degrees Fahrenheit on the surface of the earth. A growing body of scientific evidence has shown that increasing greenhouse gas emissions from anthropogenic sources (such as fossil fuel combustion) have the potential to generate large-scale global temperature increases (global warming). The major greenhouse gases include carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>).

The California Air Resources Board estimates that CO<sub>2</sub> comprises approximately 90% of all GHG emissions statewide. Air quality monitoring has shown that atmospheric concentrations of CO<sub>2</sub> have been increasing, most likely a result of increased combustion of fossil fuels. According to the California Air Resources Board, the combustion of fuels related to transportation (including air travel) accounts for approximately 38% of total CO<sub>2</sub> emissions statewide, with gasoline consumption (i.e. on-road mobile sources) accounting for the greatest portion of the transportation emissions.



**Table 4.3-1 Description Of Selected Air Contaminants**

<p><b>PHOTOCHEMICAL OXIDANT (Ox)</b></p> <p>Characteristics- The term “photochemical oxidant” can include several different pollutants, but consists primarily of ozone (more than 90 percent) and a group of chemicals called organic peroxy nitrates. Photochemical oxidants are created in the atmosphere rather than emitted directly into the air. Photochemical oxidants are created in the atmosphere rather than emitted directly into the air. Reactive organic gases and oxides of nitrogen are the emitted contaminants which participate in the reaction. Ozone is a pungent, colorless toxic gas which is produced by the photochemical process. Photochemical oxidant is a characteristic of southern California type smog, and reaches highest concentrations during the summer and early fall.</p> <p>Sources - Ozone is caused by complex atmospheric reactions involving oxides of nitrogen and reactive organic gases with ultraviolet energy from sunlight. Motor vehicles are the major source of oxides of nitrogen and reactive organic gases in the basin.</p> <p>Effects - The common manifestations of ozone and other photochemical oxidants are damage to vegetation and cracking of untreated rubber. Ozone in high concentrations (ranging from 0.15 ppm to 0.50 ppm) can also directly affect the lungs, causing respiratory and coronary irritation and possible changes in lung functions. These health problems are particularly acute in children and elderly people exposed to these pollutants.</p>
<p><b>CARBON MONOXIDE (CO)</b></p> <p>Characteristics - CO is colorless, odorless, toxic gas produced through the incomplete combustion of fossil fuels. Concentrations are higher in winter when more fuel is burned for heating purposes and weather conditions favor the build-up of directly emitted contaminants.</p> <p>Sources -The use of gasoline powered engines is the major source of this contaminant, with the automobiles being the primary contributor. CO emissions from gasoline powered engines are higher during winter months due to poor engine efficiency in cold temperatures. Various industrial processes also produce CO emissions through incomplete combustion of fossil fuels.</p> <p>Effects - CO does not irritate the respiratory tract, however, it passes through the lungs directly into the blood stream and, by interfering with the transfer of oxygen, deprives sensitive tissues of oxygen.</p>
<p><b>NITROGEN OXIDES (NOx)</b></p> <p>Characteristics - It primarily consists of nitric oxides (NO) (a colorless, odorless gas formed from atmospheric nitrogen and oxygen when petroleum combustion takes place under high temperatures and/or pressure) and nitrogen dioxide (NO<sub>2</sub>) (a reddish-brown irritating gas formed by the combination of nitric oxide with oxygen). Due to the role they play as ozone precursors, oxides of nitrogen are treated as non-attainment pollutants in Santa Barbara County.</p> <p>Sources - High combustion temperatures cause nitrogen and oxygen to combine and form nitric oxide. Further reaction produces additional oxides of nitrogen. Combustion in motor vehicle engines, power plants, refineries and other industrial operations are the primary sources in the region. Ships, railroads and aircraft are other significant emitters.</p> <p>Effects - Oxides of nitrogen are direct participants in photochemical smog reactions. The emitted compound, nitric oxide, combines with oxygen in the atmosphere in the presence of sunlight, to form nitrogen dioxide and ozone. Nitrogen dioxide, the most significant of these pollutants, can color the atmosphere at concentrations as low as 0.5 ppm on days of 21 0-mile visibility. NO<sub>2</sub> is an important air pollutant in the region because it is a primary receptor of ultraviolet light. The latter initiates photochemical reactions, helping to form ozone and/or particulate nitrate. It will also react in the air to form nitrate particulates.</p>

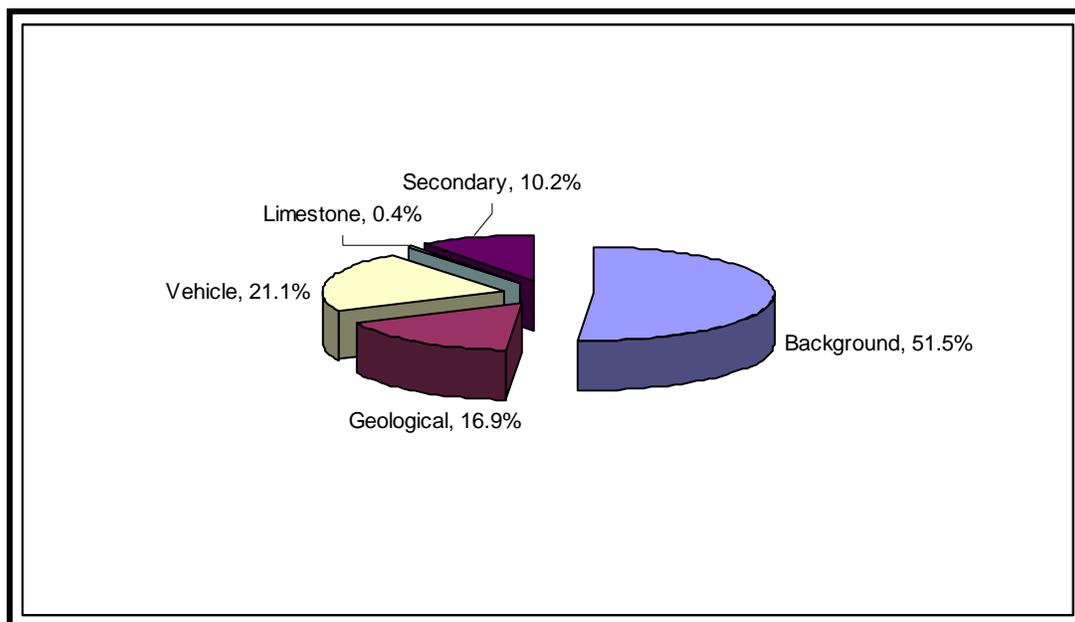


**Table 4.3-1 Description Of Selected Air Contaminants**

<p><b>SULFUR DIOXIDE (SO<sub>2</sub>)</b></p> <p>Characteristics - SO<sub>2</sub> is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. In humid atmospheres, SO<sub>2</sub> can form sulfur trioxide and sulfuric acid mist, with some of the latter eventually reacting to produce sulfate particulates.</p> <p>Sources -This contaminant is the natural combustion product of sulfur or sulfur-containing fuels. Fuel combustion is the major source, while chemical plants, sulfur recovery plants, and metal processing are minor contributors.</p> <p>Effects - At sufficiently high concentrations, sulfur dioxide irritates the upper respiratory tract. At lower concentrations, when in conjunction with particulates, SO<sub>2</sub> appears able to do still greater harm by injuring lung tissues. Sulfur oxides, in combination with moisture and oxygen, can yellow the leaves of plants, dissolve marble and eat away iron and steel. Sulfur oxides can also react to form sulfates which reduce visibility..</p>
<p><b>PARTICULATES (TSP and PM<sub>10</sub>)</b></p> <p>Characteristics - Atmospheric particulates are made up of finely divided solids or liquids such as soot, dust, aerosols, fumes and mists. About 90 percent by weight of the emitted particles are larger than 10 microns in diameter, but about 10 percent by weight, or 90 percent of the total <i>number</i> of particulates are less than 5 microns in diameter. The aerosols formed in the atmosphere, primarily sulfate and nitrate, are usually smaller than 1 micron. In areas close to major sources, particulate concentrations are generally higher in the winter, when more fuel is burned for heating, and meteorological conditions favor the build-up of directly-emitted contaminants. However, in areas remote from major sources and subject to photochemical smog (ozones), particulate concentrations can be higher during summer months because the presence of ozone increases the potential for SO<sub>2</sub> and NO<sub>2</sub> to convert to sulfate and nitrate particulates.</p> <p>Sources - Particulate matter consists of particles in the atmosphere resulting from many kinds of dust and fume-producing industrial and agricultural operations, from combustion, and from atmospheric photochemical reactions. Re-entrained road dust from vehicles is a significant source of particulates. Natural activities also put particulates into the atmosphere; wind-raised dust and ocean spray are two such sources of particulates.</p> <p>Effects - In the respiratory tract very small particles of certain substances may produce injury by themselves, or may contain absorbed gases that are injurious. Suspended in the air, particulates less than 5 microns in diameter can both scatter and absorb sunlight, producing haze and reducing visibility. They can also cause a wide range of damage to materials.</p>
<p><b>HYDROCARBONS AND OTHER ORGANIC GASES (THC, CH<sub>4</sub> NMHC (non-methane), AHC, NHC)</b></p> <p>Characteristics - Any of the vast family of compounds consisting of hydrogen and carbon in various combinations are known as hydrocarbons. Fossil fuels are included in this group. Many hydrocarbon compounds are major air pollutants, and those which can be classified as olefins or aromatics are highly photochemically reactive. Atmospheric hydrocarbon concentrations are generally higher in winter because the reactive hydrocarbons react more slowly in the winter and meteorological conditions are more favorable to their accumulating in the atmosphere to higher concentration before producing photochemical oxidants. Due to the role they play as ozone precursors, reactive hydrocarbons are treated as non-attainment pollutants in Santa Barbara County.</p> <p>Sources - Motor vehicles are a major source of anthropogenic hydrocarbons (AHC) in the basin. Other sources include evaporation of organic solvents and petroleum refining and marketing operations. Trees are the principal emitters of biogenic or natural hydrocarbons (NHC) (Chameides, 1988).</p> <p>Effects - Certain hydrocarbons can damage plants by inhibiting growth and causing flowers and leaves to fall. Levels of hydrocarbons currently measured in urban areas are not known to cause adverse effects in humans. However, certain members of this contaminant group are important components in the reactions which produce photochemical oxidants.</p>



**Figure 4.3-1**  
**Santa Barbara County Annual Average PM<sub>10</sub> Source Apportionments**



Source: Santa Barbara County Particulate Matter Emission Reduction Study, 1991  
Vehicle Category: includes trucks, buses, heavy farm equipment, ships, trains, ships, aircraft. It does not include road or soil dust created by vehicles.

**c. Local Regulatory Framework.** Air Quality regulations in Santa Barbara County are subject to both Federal and State standards. The 1990 Clean Air Act mandated that the federal Environmental Protection Agency (EPA) manage and control air quality by establishing the National Ambient Air Quality Standards (NAAQS). In California, the task of air quality management and regulation has been legislatively granted to the California Air Resources Board. The California Air Resources Board is responsible for research activities, the establishment of California Ambient Air Quality Standards (CAAQS) guidelines for air quality management, and the regulation of both stationary and mobile emission sources (i.e., motor vehicles). The CAAQS are generally more stringent than corresponding Federal standards. Table 4.3-2 illustrates both the Federal and State current pollutant regulations.

The California Air Resources Board established fourteen air basins and delegated local pollution control authority to Air Pollution Control Districts (APCD). For Santa Barbara County, located within the South Central Coast Air Basin, air pollution control authority is vested with the Santa Barbara County APCD.

Emission Regulations. Mobile emission sources are regulated through the establishment of Federal and State vehicle emission requirements with which auto manufacturers must comply. Motor vehicle emissions are also regulated by the State's vehicle inspection and maintenance program (the "Smog Check Program"). Indirectly, increases in motor vehicle emissions can be regulated by agencies other than Santa Barbara County APCD or ARB through CEQA and determinations of consistency with the CAP and other City and County General Plans.

**Table 4.3-2 Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Ozone	0.08 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg) 20.0 ppm (1-hr avg)
Nitrogen Dioxide	0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.30 ppm (annual avg)
Sulfur Dioxide	0.03 ppm (annual avg) 0.14 ppm (24-hr avg) 0.5 ppm (3-hr avg)	0.04 ppm (24-hr avg) 0.25 ppm (1-hr avg)
Lead	1.5 $\mu\text{g}/\text{m}^3$ (calendar quarter)	1.5 $\mu\text{g}/\text{m}^3$ (30-day avg)
Particulate Matter (PM <sub>10</sub> )	150 $\mu\text{g}/\text{m}^3$ (24-hr avg)	20 $\mu\text{g}/\text{m}^3$ (annual avg) 50 $\mu\text{g}/\text{m}^3$ (24-hr avg)
Particulate Matter (PM <sub>2.5</sub> )	15 $\mu\text{g}/\text{m}^3$ (annual avg) 35 $\mu\text{g}/\text{m}^3$ (24-hr avg)	12 $\mu\text{g}/\text{m}^3$ (annual avg)

*ppm= parts per million*

*$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter*

*Source: California Air Resources Board, <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>, December 2007.*

**Pending Greenhouse Gas Regulations.** The impetus for climate change legislation in the state was Assembly Bill 32 – The California Global Warming Solutions Act of 2006. AB 32 requires the California Air Resources Board to establish a statewide GHG emissions cap for the year 2020, based on 1990 levels of GHG emissions. Assembly Bill 1493, which was enacted in September 2004 (a few years before AB 32 was passed), can be seen as the mobile source component of AB 32 in that it requires vehicles manufactured after the year 2009 to adhere to CO<sub>2</sub> emission standards. The trend in increasing CO<sub>2</sub> emissions will likely continue until AB 1493 kicks in, as those vehicles manufactured after the year 2009 are incorporated into the overall vehicle fleet. California Air Resources Board staff has estimated that the CO<sub>2</sub> emission standards established by AB 1493 will result in an 18% reduction in GHG emissions by 2020 and a 27% reduction by 2030.

**d. Current Air Quality.** Monitoring of ambient air pollutant concentrations is conducted by the ARB, Santa Barbara County APCD and industry. Monitors operated by the ARM and APCD are part of the State and Local Air Monitoring System (SLAMS). The SLAMS stations are located to provide local and regional air quality information. Monitors operated by industry, at the direction of the APCD, are called Prevention of Significant Deterioration (PSD) stations. PSD stations are required by the APCD to ensure that new and modified sources under APCD permit do not interfere with the County’s ability to attain or maintain air quality standards. Figure 4.3-4 illustrates shows the locations of all monitoring stations in Santa Barbara County that are currently in operation.

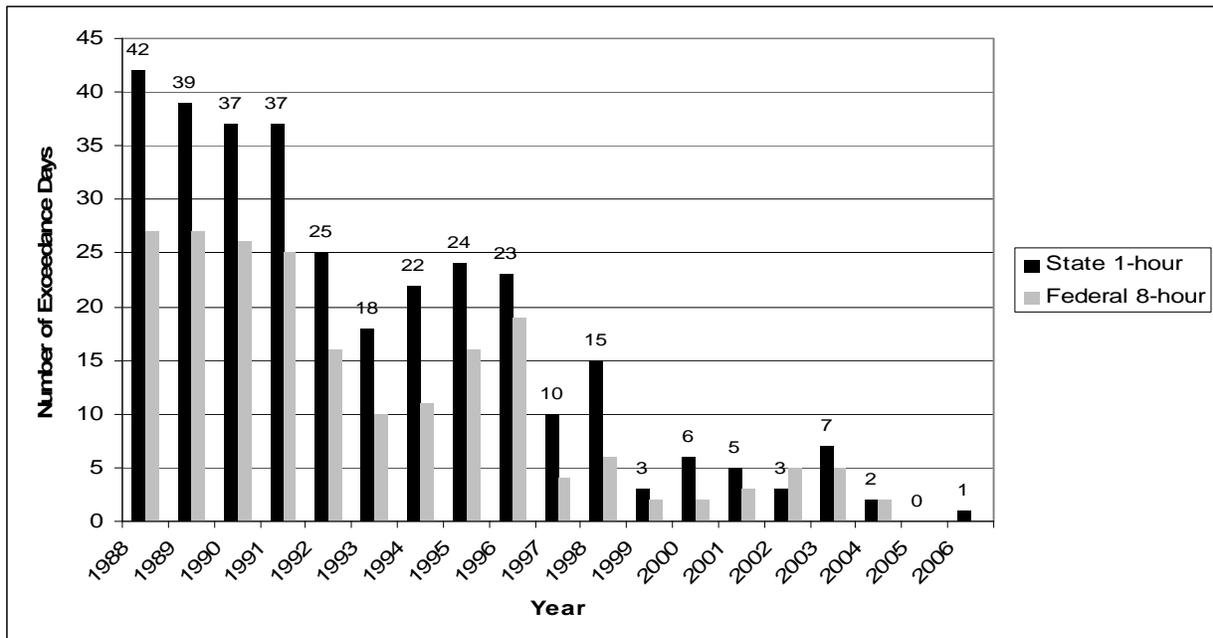
The Santa Barbara County ~~air quality management agency~~ **Air Pollution Control District** is required to monitor air pollutant levels to assure that the air quality standards are met and, in the event they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “non-attainment.” Countywide historical data on the number of 1- and 8-hour state and 8-hour federal exceedances is provided in Figure 4.3-2. Although state and federal ozone exceedances occur, the



trend is positive with fewer exceedances occurring over time. State and federal carbon monoxide standards have not been exceeded since 1985. Although federal annual PM<sub>10</sub> standards have not been exceeded, the state standard has been exceeded as indicated in Figure 4.3-3. At this time, Santa Barbara County is an unclassifiable area for the federal/state PM<sub>2.5</sub> standards.

In summary, the County is currently classified as being an attainment area for the 8-hour federal ozone standard, a “moderate” non-attainment area for the state ozone standard, and non-attainment for the state PM<sub>10</sub> standard.

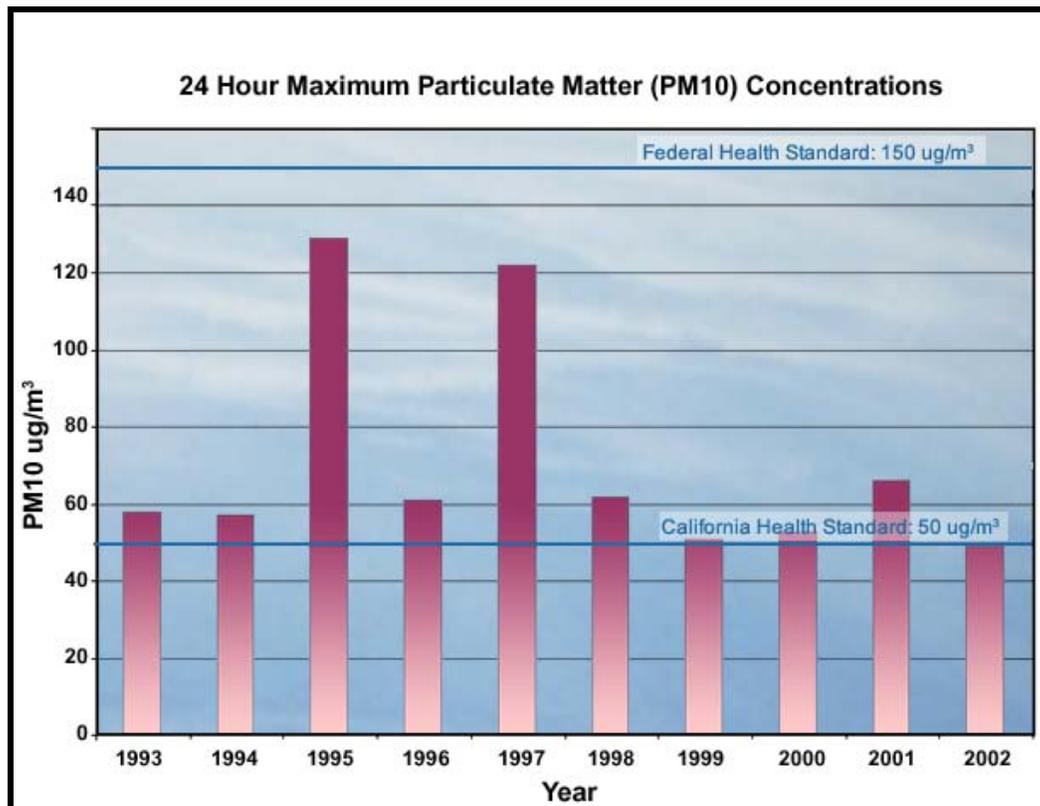
**Figure 4.3-2  
 Historical Santa Barbara County Ozone Exceedances (1990-2006)**



Source: 2007 Clean Air Plan



**Figure 4.3-3**  
**Historical Santa Barbara County PM<sub>10</sub> Exceedances (1993-2002\*)**



\* PM<sub>10</sub> data for 2003, 2004, and 2005 is currently not available.

**e. Clean Air Plan.** The Federal Clean Air Act Amendments (FCAAA) of 1990 set a schedule for the attainment of the NAAQS. States are required to prepare a State Implementation Plan (SIP) to develop strategies to bring about attainment of the standards. In addition, the California Clean Air Act of 1988 requires areas that exceed the California ambient air quality standards to plan for the eventual attainment of the State standards. Under both the 1990 FCAAA and the 1988 CCAA, the level of Santa Barbara County's ozone problem originally resulted in the county being classified as a "moderate" non-attainment area.

Since the passage of the 1990 FCAAA, six Clean Air Plan updates have been developed for Santa Barbara County: 1) 1993 Rate of Progress Plan; 2) 1994 Clean Air Plan (1-Hour Ozone Attainment Demonstration Plan); 3) 1998 Clean Air Plan; 4) 2001 Clean Air Plan (Maintenance Plan); 5) 2004 Clean Air Plan (State Triennial Update); and, 6) 2007 Clean Air Plan. The current plan focuses on both a Maintenance Plan for the federal 8-hour ozone standard and triennial update and revision for the state 1-hour ozone standard.

### 4.3.2 Impact Analysis

**a. Methodology and Significance Thresholds.** This analysis follows the guidance and methodologies recommended in the Santa Barbara County APCD's *Scope and Content of Air Quality Sections in Environmental Documents, 2007 June 2008*, the County of Santa Barbara Environmental Thresholds and Guidelines Manual, 2006, and the CEQA Appendix G thresholds.



The Santa Barbara County APCD Board has adopted the following thresholds of significance in October of 1995. Accordingly, a proposed project will have a significant air quality impact on the environment, if operation of the project will: **Many of these apply to single development projects and don't necessarily apply to Regional Transportation Plans. However, the following threshold was used for the analysis for the 2008 RTP:**

- ~~Emit (from all project sources, both stationary and mobile) more than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule, for any pollutant (i.e. 240 lbs/day for ROC; 80 lbs/day for PM<sub>10</sub>. There is no daily operational threshold for CO; it is an attainment pollution);~~
- **The Plan will have a significant air quality impact on the environment if implementation of the Plan will result in the ~~emit~~ emission of more than 25 lbs/day or 4.56 tons/year of NO<sub>x</sub> or ROC from motor vehicle trips only;**
- ~~Cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);~~
- ~~Exceed the APCD health risk public notification thresholds adopted by the APCD board;~~
- ~~Be consistent with the latest adopted federal and state air quality plans for Santa Barbara County.~~

The County of Santa Barbara has established its own thresholds. A significant adverse air quality impact may occur when a project, individually or cumulatively, triggers any one of the following:

- ~~Interferes with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long term quantitative thresholds for NO<sub>x</sub> and ROC;~~
- ~~Equals or exceeds the state or federal ambient air quality standards for any criteria pollutants.~~

Short-Term Emissions Methodology. The SBAPCD has not adopted significance thresholds for construction-related emissions because of their temporary nature. ~~In any event, construction-related emissions are not relevant at the RTP level because such emissions are dependent on the characteristics of individual development projects.~~ Nevertheless, because the region does not meet the federal or State **8-hour** standards for ozone or the State standard for PM<sub>10</sub>, the County requires implementation of standard emission and dust control techniques for all construction.

Long-Term Emissions Methodology. With respect to long term impacts, because the RTP itself does not directly generate the emissions, County thresholds associated with "new" or Indirect Source Review do not apply in this case. However, state and federal clean air laws require that emissions of pollutants for which national or state ambient air quality standards are violated be reduced from current levels. **Therefore, the following significance threshold was used for the long-term emissions analysis:**

- ~~Therefore, the~~ **The** project's long term impacts to air quality will be considered significant if the project results in mobile source emissions that exceed existing levels. In

this case, the pollutants of concern are ozone precursors (NO<sub>x</sub> and ROC) and fine particulate matter.

The long-term emissions analysis compares the 2002 on-road mobile source emissions estimate from the 2007 CAP to the total countywide 2030 on-road emissions estimate of the 2008 RTP. The latter estimate incorporates all the roadway and transit improvement projects (no demand management projects) listed in the 2008 RTP out to 2030. Since the two emission estimates are different (CAP reflects existing conditions while the 2008 RTP projects out 20+ years beyond the existing conditions), emissions related to growth (e.g., population, employment) and changes to the vehicle fleet composition will play a major role in the outcome of the analysis. If countywide ROC or NO<sub>x</sub> emissions associated with the 2008 RTP do not exceed the 2007 CAP emission estimate for 2002, then the long-term air quality threshold of significance will not be violated.

The socio-economic growth projections used for the 2008 RTP on-road mobile source emissions analysis were based on the Regional Growth Forecast 2002 (RGF 2002) (SBCAG, March 2002). The RGF 2002 projects countywide population, housing, and employment growth out to the year 2030. These projections reflect the latest socio-economic planning assumptions for the County.

Traffic growth and characteristics were generated by SBCAG's network travel demand model. The Santa Barbara Travel Model allows SBCAG to obtain an understanding of the transportation network's performance characteristics (e.g., vehicle speeds, volume to capacity relationships, travel time, vehicle miles of travel, fuel consumption, and vehicle emissions) and estimate how socio-economic changes projected in RGF 2002 (e.g., population increases, land use development) will impact travel demand in the County.

**b. Project Impacts and Mitigation Measures.** Implementation of the RTP could create both short-term and long-term impacts to air quality. Short-term air quality impacts would be generated during construction of the capital improvements listed in the RTP. Long term emissions would be generated indirectly by the on-road vehicles, trains and aircraft which would utilize the capital improvements proposed.

**Impact AQ-1**     **Development under the 2008 RTP would have the potential to result in construction related air quality impacts. These impacts would have an adverse effect on air pollution in Santa Barbara County. However, with the incorporation of mitigation measures, impacts would be *Class II, Significant but Mitigable*.**

There are currently no air quality thresholds for construction related emissions in Santa Barbara County. However, given the scope of the infrastructure improvements identified in the 2008 RTP, a discussion of potential short term impacts is warranted. There are three basic sources of short term emissions which would be generated by implementation of the RTP. These sources include: operation of the construction vehicles, (i.e., scrapers, loaders, dump trucks); the creation of fugitive dust during clearing and grading; and the use of asphalt or other oil based substances during the final construction phases. The significance of daily emissions, particularly ROC and NO<sub>x</sub> emissions, generated by construction equipment utilized to build



RTP improvements would depend on the number vehicles used and the hours of operation. The significance of fugitive dust (PM<sub>2.5</sub> and PM<sub>10</sub>) emissions would depend upon the following factors: 1) the aerial extent of disturbed soils; 2) the length of disturbance time; 3) whether or not existing structures are demolished; 4) whether or not excavation is involved; and, 5) whether or not transport of excavated materials offsite is necessary. The amount of ROC emissions emitted by oil-based substances such as asphalt is dependent upon the type and amount of asphalt utilized. **It should be noted that use of asphalt and other oil-based substances during construction are subject to APCD Rule 329 (Cutback and Emulsified Asphalt Paving Materials).**

Intersection improvements such as signalization, re-striping or signal coordination are not expected to generate significant short term impacts. However, other RTP projects involve grading and paving, or the construction of permanent facilities. Although any individual improvement may not generate significant short-term emissions, it is highly likely that several improvements would be under construction simultaneously, generating cumulative construction emissions which could impact air quality. However, with the implementation of mitigation measures for individual projects, the resulting impacts would be reduced. Impacts would be Class II, Significant but Mitigable.

Mitigation Measures. To reduce potentially significant short-term emissions, the following mitigation measures should be applied to individual projects as they are implemented:

- AQ-1(a)** The local jurisdiction in which a particular RTP project is located shall ensure that Santa Barbara County APCD's standard dust control measures are implemented. **These measures are included in the Appendix.** The measures shall be noted on all construction plans and the local jurisdiction shall perform periodic site inspections.
- AQ-1(b)** The local jurisdiction in which a particular RTP project is located shall ensure that any haul trucks associated with the project are covered during the transportation of fill material. This requirement shall be noted on all construction plans and the local jurisdiction shall perform periodic site inspections.
- AQ-1(c)** The jurisdiction in which a particular RTP project is located shall ensure that ground disturbance is phased to the extent possible to minimize the creation of fugitive dust. This shall be accomplished through review and approval by the local jurisdiction of the construction schedule submitted in association with the project's environmental review.
- AQ-1(d)** The jurisdiction in which a particular RTP project is located shall ensure that the Best Available Control Technology is implemented to reduce short-term NO<sub>x</sub> emissions. BACT measures shall include 2 degree timing retard, high pressure fuel injectors and reformulated diesel fuel, if available. These measures shall be

noted on all construction plans and the local jurisdiction shall perform periodic site inspections.

~~AQ-1(e) — The jurisdiction in which a particular RTP project is located shall ensure that the implementing agency contributes monies for off-site mitigation in addition to performing the measures listed above. Examples of current off site mitigation programs include school bus replacement/conversion and the SBCAPCD Clean Air Express. This mitigation shall be accomplished through the application of this condition by the responsible jurisdiction during the individual project's environmental review.~~

~~AQ-1(f-e)~~ The jurisdiction in which a particular RTP project is located shall ensure that the removal of underground storage tanks is a permitted activity in accordance with SBCAPCD rules and regulations. This shall be accomplished through the submittal of SBCAPCD permits to the local jurisdiction prior to issuance of a grading permit.

Significance after Mitigation. With the implementation of the above mitigation, impacts related to short-term construction emissions would be less than significant.

**Impact AQ-2** **Implementation of the 2008 RTP would reduce emissions of ozone precursors as compared to implementation of the no project scenario. Although implementation of the 2008 RTP would increase PM<sub>10</sub> emissions as compared to implementation of the no project scenario existing levels, the increase would not exceed threshold levels emissions would be less than the no project scenario. Therefore, long-term operational impacts would be Class III, *Less than Significant*.**

The list of capital improvement projects of the 2008 RTP includes widening of existing roadways and bridges, construction of new roadways, and construction of new transit and airport facilities. Of all these projects, the roadway projects are considered to be the greatest source of long term emissions because ozone precursors are generated primarily by on-road vehicles. The 2007 CAP contains countywide emission estimates reflecting both existing and future conditions. The mobile emission estimates within these inventories assume a vehicle fleet growth from 289,530 vehicles in 2002 to 425,855 vehicles in 2020. The emission estimates also considered all types of emitting modes (e.g., cold start, hot start, hot stabilized, diurnal running exhaust and tire wear). The 2007 CAP indicates that ROC and NO<sub>x</sub> emissions are anticipated to decline due to advances in alternate fuels, more stringent engine emission regulations, and fleet turnover. However, because this estimate of future emissions projects only out to the year 2020, it does not take into consideration overall growth in population, housing, employment, vehicles, vehicle activity (vehicle starts and vehicle miles of travel), or speed distribution changes that may result during the full 20 year forecast horizon of the 2008 RTP.

A **Planned Plan** – No Project emissions analysis was prepared to holistically evaluate all improvements considered as a program rather than on a project-by-project basis using the same plan horizon year of 2030. This emissions analysis isolates/reflects only the emissions impact associated with the capital improvements as identified in the “**Planned Plan**” scenario or the lack of improvements in the “No Project” scenario. Similarly, a **Programmed Program – Planned Plan** emissions analysis was conducted to isolate the emissions impact of **Programmed Program** project emissions relative to **Planned Plan** project emissions.

The on-road mobile source emissions estimates for the 2008 RTP were produced with the EPA approved EMFAC2007 emission inventory model developed by the California Air Resources Board for use in California. Table 4.3-3 shows the results of the long-term emissions analysis. The results of the comparative emissions analysis of each RTP scenario are provided in Table 4.3-4. The latter analysis is based on annual emissions which were computed for each scenario by summing 66.6% of the daily summer planning inventory and 33.3% of the daily winter planning inventory and multiplying by 365 days. ROC and NOx are combined given that they are the two primary ozone precursor gases emitted by on-road mobile sources.

**Table 4.3-3 Threshold of Significance Results (Roadway and Transit Improvements)**

<b>Scenario</b>	<b>Analysis Year</b>	<b>ROC (tons/day)</b>	<b>NOx (tons/day)</b>	<b>CO (tons/day)</b>	<b>PM<sub>10</sub> (tons/day)*</b>
<u>2007 Clean Air Plan</u>	<u>2002</u>	<u>13.28</u>	<u>18.84</u>	<u>128.69</u>	<u>0.56</u>
<u>2008 RTP Planned Plan Scenario</u>	<u>2030</u>	<u>3.22</u>	<u>4.21</u>	<u>23.02</u>	<u>0.68</u>

<b>Pollutant (Tons/day)</b>	<b>Clean Air Plan Year 2002</b>	<b>Clean Air Plan (Year 2020)</b>	<b>RTP Year 2030 Plan</b>	<b>Difference (2002 to 2030)</b>
ROC	13.28 t/d	4.58 t/d	3.22 t/d	-10.06 t/d
NOx	18.84 t/d	6.98 t/d	4.21 t/d	-14.63 t/d
CO	128.69 t/d	38.62 t/d	23.02 t/d	-105.67 t/d
PM <sub>10</sub> *	0.56 t/d	0.68 t/d	0.68 t/d	+0.12 t/d

\* PM<sub>10</sub> includes tire wear and brake wear emissions

**Table 4.3-4 Annual Regional Emissions Analysis (Roadway and Transit Improvements)**

<b>RTP Alternative</b>	<b>Annual Emissions ROC + NOx (tons/year)</b>	<b>Annual Emissions CO (tons/year)</b>	<b>Annual Emissions PM<sub>10</sub> (tons/year)*</b>
2030 No-Project	2,715.6 t/y	8,657.8 t/y	255.5 t/y
2030 Programmed	2,737.5 t/y	8,785.6 t/y	262.8 t/y
2030 <b>Planned Plan</b>	2,708.3 t/y	8,402.3 t/y	248.2 t/y
<b>Plan to No Project Comparison</b>	<b>-7.3 t/y</b>	<b>-255.5 t/y</b>	<b>-7.3 t/y</b>
<b>Threshold</b>	<b>4.56 t/y</b>	<b>4.56 t/y</b>	<b>4.56 t/y</b>
<b>Impact?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

\* PM<sub>10</sub> includes tire wear and brake wear emissions

As shown in Table 4.3-3, implementation of the 2008 RTP does not violate the ozone impact Threshold of Significance. This is due primarily to more stringent vehicle emission controls combined with fleet turnover over the 20-year forecast horizon. These emission trends are



anticipated to occur despite projected growth in the vehicle population and vehicle activity. However, the analysis shows that PM<sub>10</sub> emissions will increase by 0.12 tons per day by the Year 2030 with implementation of the RTP's **planned Plan** and **programmed Program** projects. This increase can be primarily attributed to increases in VMT and vehicles trips which, in turn, generate additional brake and tire wear. While the increase in PM<sub>10</sub> emissions can be considered an adverse impact, ~~the increase would be less than 10% when compared with the 2002 baseline~~ **Table 4.3-4 indicates that the Plan scenario generates less PM10 emissions than the No Project scenario.** In addition, it should be noted that the 2008 RTP emission forecasts, regardless of which scenario, are less than the 2020 forecasts documented in the 2007 CAP. **Therefore, This this** impact would be considered less than significant.

Table 4.3-4 indicates that the "**Planned Plan**" alternative will result in lower on-road emissions of ozone precursor gases of ROC and NO<sub>x</sub> combined when compared with the "~~No-Build No Project~~" and "Programmed" scenarios. Also, emissions of CO, and PM<sub>10</sub> would be less for the "**Planned Plan**" scenario relative to the "No-Project" and "**Programmed Program**" alternatives. The lower emission results under the "**Planned Plan**" alternative are primarily due to increased average vehicle speeds resulting from the capacity increasing projects (ROC and CO) and increased transit ridership (ROC, NO<sub>x</sub>, CO, and PM<sub>10</sub>).

As shown in Table 4.3-4, the ozone precursor emissions (ROC and NO<sub>x</sub>) are slightly higher under the "~~Programmed Program~~" scenario when compared to the "~~No-Build No Project~~" scenario. This is due to a slightly higher estimate of Countywide VMT (approx. 15.3 million for the "~~Programmed Program~~" scenario versus 14.9 million for the "~~No-Build No Project~~" scenario) and higher average vehicle speeds resulting from the "~~Programmed Program~~" scenario's capacity-increasing projects. The increase is relatively minor and will be further reduced through the implementation of other projects not accounted for in the traffic model and air quality analysis (such as APCD's Vehicle Buyback Program, Intelligent Transportation Systems projects, transportation demand management programs, and pedestrian/bicycle projects).

Table 4.3-5 summarizes 2008 RTP policies that promote improvements to air quality.

**Table 4.3-5 2008 RTP Goals and Policies that Promote Air Quality Improvements**

RTP Policy	Description
1.4	The RTP program of projects shall be in conformance with the State Implementation Plan (SIP) and meet the NAAQS as required by the federal Clean Air Act Amendments of 1990
1.5	Encourage the use of alternative fuels, alternative transportation modes, and the application of advanced transportation and energy technologies to reduce vehicular emission and energy consumption
1.7	Encourage the use of Transit-Oriented Development land use planning to facilitate walking and biking and develop transit rider-ship markets.
1.8	Increase transportation system efficiency, improve mobility, reduce travel demand and provide improved air quality through the implementation of system management, demand management strategies and Intelligent Transportation Systems (ITS) applications.
3	Promote bicycling as a commute alternative, providing access to activity and employment centers, interregional connectivity, and short trips.
7	Promote the provision of pedestrian facilities to encourage walking as an alternative form of transportation and as an element of an integrated multi-modal transportation system.
5.1	Encourage the increase in passenger rail service to and within Santa Barbara County.
4	Promote expansion of public transit services with the county to meet the mobility needs of residents and visitors, and as a means to reduce traffic and parking congestion.



Mitigation Measures. None required

Significance after Mitigation. The operational impacts of the RTP on the attainment of state and federal air quality standards are less than significant.

**Impact AQ-3 The proposed regional transportation projects included in the RTP would have the potential to add diesel fueled vehicles, which would result in the release of increased toxics into the air. However, the release of such toxics associated with RTP project would be below the levels forecasted by the 2007 CAP. Therefore, impacts would be Class III, Less than Significant.**

In 1998, the California Air Resources Board identified particulate matter from diesel fueled engines as a toxic air contaminant. In urban areas, diesel particulates contribute approximately 70 percent of the known cancer risk associated with toxic air contaminants in California. Diesel particulates are emitted directly by diesel powered motor vehicles and are typically in the form of PM<sub>2.5</sub>. Secondary particulates are formed in the atmosphere through chemical reactions - typically involving oxides of nitrogen, sulfur dioxide and ammonia forming ammonium nitrate and ammonium sulfate particles. These secondary particulates are also commonly measured in the PM<sub>2.5</sub> size range. **Diesel particulates can be especially harmful when sensitive receptors (such as children and elderly people) are exposed to them near major transportation corridors, such as U.S. 101 or the Union Pacific Rail corridor.**

At this time, there are no CEQA thresholds established for mobile source project level toxics. For informational purposes, an analysis of 2030 on-road mobile source diesel PM<sub>10</sub> emissions (primary) and diesel NO<sub>x</sub> and SO<sub>x</sub> (as surrogates for secondary PM<sub>10</sub>) is shown in Table 4.3-6. Results indicate that for diesel PM<sub>10</sub> and SO<sub>x</sub> - there are no discerning differences between the 2008 RTP scenarios. Conversely, diesel NO<sub>x</sub> emissions under the "**Programmed Program**" and "**Planned Plan**" scenarios are greater than the "No-Build" RTP scenario. This is primarily due to increased average vehicle speeds resulting from the **planned Plan** capacity increasing projects in the 2008 RTP and increased transit service (i.e., greater diesel urban bus activity). As shown below, the 2008 RTP emission forecasts - regardless of which scenario - are less than the 2020 forecasts documented in the 2007 CAP.

**Table 4.3-6 On-Road Mobile Source Toxics Comparison**

<b>Vehicle Activity</b>	<b>Diesel PM<sub>10</sub> (tons/day)</b>	<b>Diesel NO<sub>x</sub> (tons/day)</b>	<b>SO<sub>x</sub> (tons/day)</b>
2007 Clean Air Plan (2020)	0.12	2.75	0.07
2008 RTP No-Build (2030)	0.09	1.75	0.07
2008 RTP <b>Programmed Program</b> (2030)	0.09	1.76	0.07
2008 RTP <b>Planned Plan</b> (2030)	0.09	1.85	0.07

Mitigation Measures: None required

Significance after Mitigation: Class III, less than significant

**Impact AQ-4 Re-entrained dust has the potential for increasing the PM<sub>10</sub> amounts in Santa Barbara County. The increase in growth**



**expected through the RTP lifespan would likely result in additional vehicles adding to the PM<sub>10</sub> and PM<sub>2.5</sub> levels in the area. With implementation of planned Plan Santa Barbara County control measures to reduce such emissions, impacts would be Class III, Less than Significant.**

As part of the scoping for this EIR, comments were received regarding the human health risks associated with re-entrained road dust. The concern was premised on the fact that although motor vehicle emission control advances have allowed vehicle tailpipe emissions of some pollutants to decrease over the last 20 years, the number of vehicles in use and the amount of vehicle activity has continued to increase. This would suggest that re-entrained road dust has increased as well. The synergistic effects of road dust (typically measured as PM<sub>10</sub>) with ozone, the hazardous constituents of re-entrained road dust itself (carcinogens, irritants, pathogens) and how they can contribute to respiratory illnesses such as asthma and allergies were emphasized and cited as part of this correspondence.

In Santa Barbara County, direct tailpipe emissions of particulate matter from motor vehicles only represent approximately 2-3 percent of the anthropogenic PM<sub>10</sub> inventory. Conversely, re-entrained road dust emissions are estimated to represent 17 percent of the PM<sub>10</sub> planning inventory. Within the urbanized areas of the County where on-road activity levels are the greatest (e.g., Santa Barbara and Santa Maria), this percentage increases (SB656 Report, APCD, 2006). Although on-road mobile source activity is a factor in generating re-entrained road dust emissions, this source of fine particulates is not directly addressed as part of the on-road mobile source emission inventory. Instead, paved road dust is classified as an area source by the California Air Resources Board and the Santa Barbara County APCD.

In 2003, the California Legislature enacted SB656 to reduce public exposure of airborne particulate matter. SB656 required the California Air Resources Board to develop and adopt by January 1, 2005 a list of readily available, feasible and cost-effective control measures that could be employed by the California Air Resources Board and local air districts (i.e., Santa Barbara County APCD) to reduce PM<sub>10</sub> and PM<sub>2.5</sub>. In response to SB656, the Santa Barbara County APCD has identified several control measures aimed at reducing PM<sub>10</sub> and PM<sub>2.5</sub> emissions. These measures are described in Table 4.3-7.

The most applicable measure to on-road vehicles listed in Table 4.3-7 – specifically to re-entrained road dust – is Source Category 1: implementation of street sweeping requirements using PM<sub>10</sub> efficiency sweepers. This measure is most applicable to the urbanized areas of the County given that vehicle related particulate emissions comprise a greater percentage of the anthropogenic particulate emission profile in these areas (SB656 Report, APCD, 2006). At this time, the two most populated Cities in Santa Barbara County, Santa Barbara and Santa Maria, each implement street sweeping programs.

There are no existing or proposed policies in the 2008 RTP that either encourage or discourage the practice of street sweeping on city streets. RTP Policy 7.5 does encourage the use of alternative fuels which applies to the street sweeping vehicles themselves. Street sweeping vehicles are typically diesel powered which may offset to some degree the benefit of reducing re-entrained road dust particles off the street by directly emitting diesel particulates and NOx. APCD policies encourage that future alternative fuel funding decisions be made with a greater



emphasis on alternative fuel infrastructure development projects to promote city fleet conversions to alternative fuel technologies. The APCD policy further encourages future alternative fuel funding decisions to be made with a greater emphasis on dedicated fuel vehicle purchases rather than conversion projects and, the local application of proven technologies as opposed to projects which promote technological innovations and the greater promotion of the application of controls to address a specific technology type or fuel (e.g., heavy duty diesel trucks). These policies serve to minimize the potential pollutant tradeoff (re-entrained road dust vs. directly emitted PM<sub>10/2.5</sub> and NO<sub>x</sub>) from the county's existing and future street sweeping programs.

**Table 4.3-7 Santa Barbara County Proposed PM<sub>10</sub> and PM<sub>2.5</sub> Control Strategy**

<b>Source Category 1</b>	
Source Contributor	Paved Roads
Control Description	Establish requirements for sweeping existing roads using PM10 efficiency sweepers
Expected Cost Effective, \$/ton PM10 reduced	\$33-\$1070
Expected Emission Control Efficiency, %	PM10 efficient sweeper reduces street soil loading by 86%; non-PM10 efficient sweeper reduces street soil loading by 55%
Rule Adoption Timeline	2007/2008
<b>Source Category 2</b>	
Source Contributor	Unpaved Roads
Control Description	Set control requirements for unpaved roads (e.g., setting speed limits)
Expected Cost Effectiveness, \$/ton PM10 reduced	\$1100
Expected Emission Control Efficiency	1%
Rule Adoption Timeline	2008/2010
<b>Source Category 3</b>	
Source Contributor	Construction/Demolition
Control Description	Establish requirements for earthmoving, demolition, and grading operations including the following:  <ul style="list-style-type: none"> <li>a. applying water</li> <li>b. posting speed limits to 15 mph</li> <li>c. require dust control plans for designated projects</li> <li>d. setting minimum soil moisture for earthmoving activities</li> <li>e. applying chemical stabilizers/dust suppressants</li> </ul>
Expected Cost Effectiveness, \$/ton PM10 reduced	\$300-\$86,000
Expected Emission Control Efficiency, %	13-84
Rule Adoption Timeline	2009/2011

*\*Based on a request by the County Fire Department, the APCD is also considering revising APCD Rule 312 in the 2006-07 timeframe. This rule revision would apply a no-burning restriction of any combustible refuse in an open outdoor fire in the North County – which is currently the only area in the County not subject to existing rule.*

Mitigation Measures: None required

Significance after Mitigation: Class III, less than significant

**c. Cumulative Impacts.** Construction of the projects identified by the 2008 RTP would emit pollutants into the air. On a cumulative level, construction emissions could emit large amounts of pollutants. However, because Santa Barbara County does not have construction thresholds and the nature of the emissions analysis in this EIR, it is difficult to determine the significance of these impacts. However, with full implementation of the construction mitigation measures listed above, the impact could be classified as less than significant.



Additionally, the RTP would also include improvements to the roadway infrastructure that would allow for greater capacity and LOS. The improvements would benefit air quality due to increased flow of traffic, rather than idling.

**Impact AQ-5    The proposed RTP forecast horizon is not consistent with the 2007 CAP. However, since the RTP and CAP socio-economic, vehicle activity growth assumptions and associated emissions estimates are identical, and the RTP implements the on-road mobile source emission control strategy of the CAP, impacts would be Class III, Less than Significant.**

Vehicle use, energy consumption, and associated pollutant emissions are directly related to population growth. If the 2007 CAP growth assumptions are likely to be exceeded as a result of the proposed RTP improvements, then the RTP cannot be found consistent with the CAP. To determine consistency, several comparisons can be made to gauge the growth inducing impacts of the RTP with the growth assumptions of the 2007 CAP. Namely, these are the socio-economic assumptions (population, housing and employment), vehicle activity assumptions (VMT and trips) and resulting ozone precursor emissions (ROC + NO<sub>x</sub>).

The socio-economic assumptions for both the 2008 RTP and 2007 CAP are based on SBCAG's 2002 Regional Growth Forecast. Additionally, both planning efforts used the same model data inputs, resulting in matching vehicle activity output from the traffic model. Therefore, the emissions estimates for the future years are identical when comparing the 2008 RTP and the 2007 CAP.

Another consideration of consistency is how the 2008 RTP implements/promotes the on-road mobile source emission control strategy in the 2007 CAP. Table 4.3-5 lists the 2008 RTP policies that promote the on-road mobile source air quality objectives in the 2007 CAP. More specifically, Table 4.3-8 lists the projects and programs approved by the SBCAG board as part of the 101 In-Motion process for incorporation into the 2008 RTP. All of the projects and programs listed were adopted as Transportation Control Measures in the 2007 Clean Air Plan.

**Table 4.3-8 2008 101-In-Motion Recommended Projects/Programs  
 Adopted as TCMs for 2007 Clean Air**

Add a Carpool/High Occupancy Lane both directions south of Milpas to County Line
Enhanced rail service for commuters, Camarillo/Oxnard/Ventura to Goleta
Increase express bus services to North County
Connect local bus and shuttles with rail and regional services
Provide bus priority on selected streets through signal priority, queue jumps, bulb-outs
Provide vanpool/carpool trip reduction incentives
Peak period parking management – apply variable parking rates as feasible by jurisdiction
Encourage telecommuting and flexwork/time schedules by employers
Promote individualized marketing for demand management strategies
Add capacity and install meters at selected ramps
Use Intelligent Transportation Systems technology to inform traveling public and smooth operations including: freeway service patrol, 511 phone service, internet traffic and transit reports and variable message signs



Outside the Highway 101 Corridor, several of the RTP roadway improvement projects provide improved access to areas with existing or anticipated congestion. Major extension projects include: the Central Avenue extension in Lompoc; the Union Valley Parkway and McCoy Lane extensions in and around the City of Santa Maria; the Fowler and Ekwill extensions and the construction of missing Cathedral Oaks Road segments in the City of Goleta; and the extension of Via Real and Carpinteria Avenue in Carpinteria. These extensions would cross primarily undeveloped agricultural and /or open space areas. However, these projects are needed due to a lack of sufficient roadway capacity or are proposed in local Circulation Elements as necessary to reduce future congestion anticipated as local General Plans are built out. It can be argued that these extensions address the potential adverse impacts associated with ~~planned Plan~~ growth on the existing system by providing additional capacity, improving system efficiency and reducing forecast congestion levels.

Furthermore, a congestion management program (CMP) for Santa Barbara County was adopted in January, 1992 and was most recently updated in 2003. This program is closely related to the RTP in that the RTP includes several improvements which were originally proposed in the CMP. The CMP identifies congestion reduction mechanisms for the CMP network which also serve to reduce air emissions. These mechanisms include: traffic analyses which assess impacts and provide appropriate mitigation; consideration of system-wide improvements to improve circulation and/or reduce emissions as part of deficiency plans; and a policy calling for each jurisdiction to assure that future development will help to achieve a job/housing balance.

Consistent with the transportation control measures in the 2007 CAP (refer to Table 4.3-8 and Table 4.3-9), the 2008 RTP identifies other means of reducing potential emissions beyond what can be reflected in SBCAG’s travel model (e.g., TDM programs, pedestrian/bicycle improvements, commuter rail improvements etc.). Qualitatively, these RTP projects serve to promote the implementation of the transportation control measures (TCMs) identified in the 2007 CAP and will help offset the .02 tons per day NOx difference between the “~~Planned Plan~~” and “~~Programmed Program~~” RTP alternatives.

The 2007 CAP identifies TCMs as a way to attain the air quality goals specified in the Clean Air Act. TCMs work by altering the way motor vehicles are used by reducing total vehicle miles traveled at critical times and places, and reducing the use of highly polluting operating modes. TCMs reduce emissions from on-road motor vehicles and trucks by: improving the existing transportation system to allow motor vehicles to operate more efficiently; inducing people to change their travel behavior to less polluting modes; or, ensuring emission control technology improvements in the motor vehicle fleet are fully and expeditiously realized.

**Table 4.3-9 2007 CAP TCMs**

<b>Currently Adopted</b>	
T-1	Trip Reduction Ordinance
T-2	Employer Based Transportation Demand Management Programs
T-3	Work Schedule Changes
T-4	Area-wide Ridesharing Incentives
T-5	Improve Commuter Public Transit Service
T-6	High Occupancy Vehicle (HOV) Lanes/High Occupancy Toll (HOT) Lanes
T-7	Traffic Flow Improvements
T-8	Parking Management
T-9	Park-and-Ride/Fringe Parking



**Table 4.3-9 2007 CAP TCMs**

T-10	Bicycle and Pedestrian Programs
T-13	Accelerated Retirement of Vehicles
T-17	Telecommunications
T-18	Alternative Fuels
T-19	Public Education
T-20	Parking Management to Reduce Non-commute Single Occupant Vehicle Use
<b>Proposed for Further Study</b>	
T-9	Park and Ride (new project)
<b>Proposed as Contingency Measures</b>	
T-21	Enhanced Inspection and Maintenance Program

*Source: 2007 Santa Barbara County CAP*

RTP projects that implement each TCM illustrated in Table 4.3-9 that applies to transportation projects are described in the paragraphs below.

T-4: Area-wide Ridesharing Incentives

This TCM is a voluntary measure that promotes ridesharing. Ridesharing is a cooperative effort of two or more people to travel together. Examples are carpools, vanpools, bus pools, trains, and public transit. The secondary function of rideshare programs, the promotion of other alternatives to single occupancy vehicles, serves to support and enhance other TCMs. The RTP includes many projects that support transit and ridesharing. The following RTP projects support this TCM:

*SBCAG-TS1  
 C-PL-9*

T-5: Improve Commuter Public Transit Service

Projects supporting this TCM include transit service by bus, rail and airplane offered by an operator on a regular schedule. The purpose of this TCM is to increase capacity on existing routes, new routes proposed by public transit operators, and increased ridership on existing routes. The following RTP projects support this TCM:

Program:	Plan:
<i>COLT-1</i>	<i>CT-PL-25 through CT-PL-33</i>
<i>CT-14 through CT-16</i>	<i>COLT-PL-3 through COLT-PL-5</i>
<i>EL-1</i>	<i>EL-PL-3 and -4</i>
<i>Gu-3</i>	<i>Gu-PL-5</i>
<i>MTD-2, -4, and -5</i>	<i>IC-PL-3, -4, -7, -8</i>
<i>SMAT-1, -2, -4, and -5</i>	<i>MTD-PL-1, -4, -6, -13, -14, -17, -18</i>
<i>SBC-9</i>	<i>MTD-PL-20, -22, -23, -27, -28</i>
<i>SBCAG-3 through SBCAG-5</i>	<i>SBC-PL-15</i>
<i>SLORTA-1</i>	<i>SBCAG-PL-1</i>
<i>SMOOTH-1 and -2</i>	<i>SMAT-PL-1, -3, -9, -10, -11, -13, -14</i>
<i>SYVT-1</i>	<i>SMOOTH-PL-1, -3, -4, and -5</i>
	<i>SYVT-PL-2 and -3</i>



#### T-6: High Occupancy Vehicle (HOV) Lanes/High Occupancy Toll (HOT) Lanes

HOV lanes are segments of roadway restricted to only HOV vehicles (2 or more persons). The aim of this is to promote ridesharing. The following RTP projects support this TCM:

*CT-8*  
*CT-PL-3*

#### T-7: Traffic Flow Improvements

Traffic flow improvements include a range of strategies that enhance the capacity and efficiency of a roadway system, without adding extra lanes or new roads. These strategies can be grouped into three main types: traffic signalization, traffic operations, and enforcement and management. The following RTP projects support this TCM:

##### Traffic Signalization

*SBC-6*  
*B-PL-4*  
*C-PL-3*  
*CT-PL-22*  
*SBC-PL-5*  
*SM-PL-9*

##### Traffic Operations

*CT-5*  
*Go-1 and -2*  
*Gu-2*  
*SB-1*  
*SBC-1, -2, and -6*  
*SM-9*  
*CT-PL-10, -15, and -35*  
*B-PL-4*  
*C-PL-1, -3, and -6*  
*Go-PL-3 and -5*  
*SB-PL-1*  
*SM-PL-7 and -10*

##### Enforcement and Management

*CT-11, -12, and -13*  
*SBCAG-2*  
*CT-PL-17 through CT-PL-21, -23 and -24*  
*SBC-PL-13*

#### T-9: Park-and-Ride/Fringe Parking

Park and ride lots provide a supporting role to transit, bicycling, and ridesharing TCMs. The projects listed in this analysis are examples of cost effective trip reducing projects that support other TCMs. The following RTP projects support this TCM:



*C-PL-9*  
*SBC-PL-14*  
*SM-PL-1*

#### T-10: Bicycle and Pedestrian Programs

Bicycle and Pedestrian programs aim at reducing the reliance on automobiles. They support recreation and mobility through both neighborhoods in addition to major thoroughfares. The following RTP projects support this TCM:

Program:	Plan:
<i>C-1 and -2</i>	<i>C-PL-7 and -8</i>
<i>CT-5</i>	<i>CT-PL-14, -16, and -22</i>
<i>Go-3 and -5</i>	<i>Go-PL-2, -5, -7, and -8</i>
<i>Gu-2</i>	<i>GU-PL-3</i>
<i>SBC-7</i>	<i>LOM-PL-3 and -4</i>
<i>L-1</i>	<i>SB-PL-2 through SB-PL-8</i>
<i>SB-2 through SB-5</i>	<i>SBC-PL-3, 7, -8, -9, -11, and -12</i>
<i>SM-6</i>	<i>SM-PL-16</i>
<i>Sol-1</i>	<i>Sol-PL-1 through Sol-PL-4</i>
<i>SBC-8</i>	
<i>SM-10</i>	

#### T-18: Alternative Fuels

The alternative fuels TCM covers the conversion of gasoline-powered vehicles to alternative fuels, replacement of gasoline-powered vehicles with new alternative fuel vehicles, increasing the infrastructure needed to successfully operate alternative fuel fleets, and new applications of electric powered vehicles. The following RTP projects support this TCM:

*MTD-2*  
*MTD-PL-8 and -9,*  
*MTD-23 through MTD-PL-24*  
*MTD-PL-27*

In conclusion, the underlying socio-economic and vehicle activity growth assumptions between the 2007 CAP and 2008 RTP are identical. Therefore, the ozone precursor emission estimates in the 2008 RTP are consistent with those projected in the 2007 CAP. The 2008 RTP includes roadway and intersection improvements which reduce existing and future congestion, thereby reducing emissions. Additionally, because the 2008 RTP includes policies and projects which promote the implementation of the 2007 CAP TCMs, the 2008 RTP is considered to be consistent with the 2007 CAP. Impacts related to the consistency are considered to be Class III, Less than Significant.

Mitigation Measures. None required.

Significance After Mitigation. The RTP is considered consistent with the CAP.



~~— c. **Cumulative Impacts.** Construction of the projects identified by the 2008 RTP would emit pollutants into the air. On a cumulative level, construction emissions could emit large amounts of pollutants. However, because Santa Barbara County does not have construction thresholds because of the temporary condition, impacts would not be significant. The RTP would also include improvements to the roadway infrastructure that would allow for greater capacity and LOS. The improvements would benefit air quality due to increased flow of traffic, rather than idling. Cumulative impacts related to implementation of the 2008 RTP would be Class II, Less than Significant.~~

**d. Greenhouse Gas Emissions.** At this time, federal, state, or local air quality planning legislation ~~regulations or guidelines~~ ~~has~~ **have** not formally established thresholds for evaluating project level greenhouse gas emissions. However, in recognition of this emerging public policy issue, a quantitative assessment of greenhouse gas emissions is included in the 2008 RTP.

The “Greenhouse Effect” refers to the Earth’s ability to capture heat absorbed from the sun and the Earth’s surface. Solar radiation from the sun passes through the atmosphere, 30% of which is immediately reflected back out into space. The other 70% is radiated back from the earth and absorbed by greenhouse gas chemicals, such as carbon dioxide, which leads to a subsequent warming effect underneath the atmosphere. This is a natural cycle that provides an average temperature of approximately 60 degrees Fahrenheit on the surface of the earth. A growing body of scientific evidence has shown that increasing greenhouse gas emissions from anthropogenic sources (such as fossil fuel combustion) have the potential to generate large scale global temperature increases (global warming). The major greenhouse gases include carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>). ~~This~~ **The** analysis focuses on **carbon dioxide (CO<sub>2</sub>)** emissions, ~~since emissions of methane from transportation account for less than 5% of the total greenhouse gas emissions statewide.~~

The California Air Resources Board estimates that CO<sub>2</sub> comprises approximately 90% of all GHG emissions statewide. Air quality monitoring has shown that atmospheric concentrations of CO<sub>2</sub> have been increasing, most likely a result of increased combustion of fossil fuels. According to the California Air Resources Board, the combustion of fuels related to transportation (including air travel) accounts for approximately 38% of total CO<sub>2</sub> emissions statewide, with gasoline consumption (i.e. on-road mobile sources) accounting for the greatest portion of the transportation emissions.

The impetus for climate change legislation in the state was Assembly Bill 32—The California Global Warming Solutions Act of 2006. AB 32 requires the California Air Resources Board to establish a statewide GHG emissions cap for the year 2020, based on 1990 levels of GHG emissions. Assembly Bill 1493, which was enacted in September 2004 (a few years before AB 32 was passed), can be seen as the mobile source component of AB 32 in that it requires vehicles manufactured after the year 2009 to adhere to CO<sub>2</sub> emission standards. The trend in increasing CO<sub>2</sub> emissions will likely continue until AB 1493 kicks in, as those vehicles manufactured after the year 2009 are incorporated into the overall vehicle fleet. California Air Resources Board staff has estimated that the CO<sub>2</sub> emission standards established by AB 1493 will result in an 18% reduction in GHG emissions by 2020 and a 27% reduction by 2030.

As mentioned above, neither the state nor the Santa Barbara County APCD has established significance thresholds for GHG emissions, including CO<sub>2</sub>. **The Governor’s Office of Planning and Research (OPR) has been tasked with developing guidelines/thresholds for evaluation of significant climate change impacts in CEQA documents. OPR will be working closely with ARB staff to develop these thresholds. For this analysis, OPR’s June 19, 2008 Technical Advisory (CEQA and Climate Change: Addressing Climate Change Through CEQA Review) was reviewed to determine how impacts of the RTP could be assessed. OPR’s recommended approach was used to determine potential significant impacts for the 2008 RTP, as described below:**

**“Each public agency that is a lead agency for complying with CEQA needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information. For these projects, compliance with CEQA entails three basic steps: identify and quantify the GHG emissions; assess the significance of the impact on climate change; and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.”**

For informational purposes, an analysis of 2030 CO<sub>2</sub> emissions was completed and is shown in Table 4.3-10. Results indicate that the 2008 RTP **“Planned Plan”** scenario achieves the lowest CO<sub>2</sub> emissions (7,310 t/d) of the three RTP alternatives. However, **it should be noted** this level is greater than the 2002 baseline reported in the 2007 CAP.

**Table 4.3-10 Carbon Dioxide Emission Comparison**

<b>Analysis</b>	<b>CO<sub>2</sub> Emissions (tons/day)</b>
2007 Clean Air Plan – Year 2002	4,970
2008 RTP <b>“No-Build No Project”</b> – Year 2030	7,450
2008 RTP <b>“Programmed Program”</b> – Year 2030	7,610
2008 RTP <b>“Planned Plan”</b> – Year 2030	7,310
<b>Year 2002 to 2030 Plan</b>	<b>+2,340</b>
<b>Plan to No Project comparison</b>	<b>-140</b>

Results of the analysis indicate the following:

- By the Year 2030, in the absence of federal and state regulations, CO<sub>2</sub> emissions from on-road mobile sources will increase by roughly 50%.
- Looking at the RTP projects in isolation, the **“Programmed Program”** scenario would result in the addition of 160 tons (a 2% increase) of CO<sub>2</sub> emissions per day when compared with the “No Build” scenario. This can be attributed to higher VMT estimates for light-duty vehicles under the **“Programmed Program”** scenario.
- Of the three alternatives, the **“Planned Plan”** scenario would result in the least amount of CO<sub>2</sub> emissions in the Year 2030. Implementation of the **“Planned Plan”** projects would reduce CO<sub>2</sub> emissions by 140 tons per day compared to the **“No-Build No Project”** scenario.



~~Put into perspective, on-road mobile source emissions of CO<sub>2</sub> in Santa Barbara County represent about 3% of the total CO<sub>2</sub> emitted statewide in the Year 2030. On a global scale, this represents a miniscule amount of the total internationally. Therefore, it can be concluded that CO<sub>2</sub> emissions generated from regional transportation projects in Santa Barbara County will not lead to any significant worldwide increase in global temperatures.~~

~~Despite this limited effect~~ **In observing the increase in CO<sub>2</sub> from the present day to 2030 (50%), it is incumbent by SBCAG, as a member of the worldwide community, to encourage trip reduction and alternative mode choice to reduce the rate of growth in VMT. The SBCAG Traffic Solutions programs and alternative mode projects help to achieve these reductions in the rate of VMT growth. Additionally, the following measures would help offset increases in GHG emissions, such as:**

- *Use of trees and other landscaping to provide shade, absorb CO<sub>2</sub> and reduce heat radiation from hard surfaces.*
- *Promoting the use of non-vehicle related travel*
- *Requiring the environmental documents for the individual projects include a sufficient GHG analysis*
- *Use of non-toxic, recycled content building materials*

**ARB is developing additional GHG reduction measures as part of its efforts related to AB 32 implementation. It is recommended that lead agencies incorporate these measures and these into transportation projects, as feasible. As stated above, the proposed 2008 RTP would not directly result in impacts that would increase GHG emissions to Santa Barbara County. The SBCAG has evaluated whether the RTP would contribute to cumulative impacts related to global climate change and acknowledges even very small contributions of GHG can result in cumulative impacts. While full implementation of the Plan projects results in slightly less CO<sub>2</sub> emissions than the No Project scenario, it's important to acknowledge that some of the projects, taken individually, could be a source of new GHG emissions. For example, construction of some RTP projects would result in increased emissions cumulatively. In the absence of regulatory controls, it's difficult to recommend specific mitigation measures for construction activities. Lead agencies on these individual RTP projects will most likely be subject to pending CEQA regulations for greenhouse gases contained in this RTP would be analyzed individually and would require a conduct a separate GHG emissions analysis in the environmental review phase of the project.**

As noted in the Local Regulatory Framework section, AB 32 requires the California Air Resources Board to establish a statewide GHG emissions cap for the year 2020, based on 1990 levels. Some projects in the RTP will help further the State's goals by reducing GHG emissions. Also, some of these projects are consistent with recommended mitigation measures in OPR's June 2008 Technical Advisory. Examples of RTP projects that would be expected to reduce GHG emissions include major congestion relief projects, such as the proposed HOV lane additions on U.S. 101, projects that increase the efficiency and operation of the transportation system, such as ITS projects, addition of new regional transit buses, and TDM projects/programs that reduce vehicles miles traveled.

It should also be noted that the pending California Senate Bill 375 would require SBCAG to develop a "Sustainable Communities Strategy" in its RTP updates. Elements of the strategy

will examine land use-transportation relationships, travel patterns, impacts on climate change, greenhouse gas emissions, and jobs-housing relationships, among other factors. If passed, SBCAG will develop the strategy in its next RTP update with extensive public, stakeholder, and local agency participation, to meet targeted reductions in greenhouse gas emissions set by the Air Resources Board.

**e. Specific RTP Projects That May Result in Impacts.** The proposed projects found in Table ES-2 would have the potential to result in air quality impacts. All projects that include a construction component would associate with Impact AQ-1. Projects that include roadway features would associate with Impacts AQ-2 through AQ-4. Further, projects that include transit expansion would associate with Impacts AQ-3 and AQ-4. It would be redundant to show that all projects with construction components have these air quality impacts. Additional specific analysis will need to be conducted as the individual projects are designed and implemented in order to determine the actual magnitude of impact. Mitigation measures discussed above could apply to these specific projects.

### 3.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

Commentors on the Draft EIR include public agencies, professional associations, citizen groups, and private individuals and businesses (refer to Table 3-1). No verbal environmental comments beyond the written comments below were received at 2008 RTP Update Public Workshops on August 5 and 6, 2008, or the SBCAG Public Hearing of August 21, 2008.

**Table 3-1 Commentors on the Draft EIR**

<b>Letter No.</b>	<b>Commentor</b>	<b>Agency/Organization</b>	<b>Date</b>
<b>State Agencies</b>			
S.1	Carol A. Glatfelter, Associate Aviation Planner	California Department of Transportation, Division of Aeronautics – M.S. #40	August 4, 2008
S.2	Rosa Munoz, PE, Utilities Engineer	State of California Public Services Commission, Rail Crossings Engineering Section, Consumer Protection and Safety Division	August 29, 2008
S.3	Edmund J. Pert, Regional Manager	California Department of Fish and Game, South Coast Region	September 2, 2008
S.4	Aileen K. Loe, Deputy District Director	California Department of Transportation, Planning and Local Assistance	September 2, 2008
S.5	Brian Leahy, Assistant Director	State of California Resources Agency, Department of Conservation, Division of Land Resource Protection	September 2, 2008
<b>County Agencies</b>			
C.1	Scott D. McGolpin, Director	County of Santa Barbara Public Works Department	July 30, 2008
<b>Regional Agencies</b>			
R.1	Bobbie Bratz, Public Information and Community Programs Supervisor	Santa Barbara County Air Pollution Control District, Technology and Environmental Review Division	September 2, 2008
<b>Local Agencies</b>			
L.1	Steve Wagner, Community Services Director	City of Goleta	August 27, 2008
L.2	Sherrie Fisher, General Manager	Santa Barbara Metropolitan Transit District	August 27, 2008
L.3	Matt Roberts, Director, Parks and Recreation	City of Carpinteria	September 2, 2008
<b>Federally-Recognized Indian Tribe</b>			
F.1	Sam Cohen	Santa Ynez Chumash	August 15, 2008
F.2	Neal Olinger	Chumash Casino	August 25, 2008
<b>Organizations</b>			
O.1	Michael Chiacos, Senior Associate; Tam Hunt, Energy Program Director/Lawyer	Community Environmental Council	August 20, 2008
O.2	Paul Hernadi, Chair	Comprehensive Planning Committee for the Citizens Planning Association	September 2, 2008
O.3	Roger Freedman, President	Santa Barbara Airport Advocates	September 2, 2008
O.4	Tracey Singh	Safe Routes to School Committee at Cold Spring School	September 2, 2008



**Table 3-1 Commentors on the Draft EIR**

<b>Letter No.</b>	<b>Commentor</b>	<b>Agency/Organization</b>	<b>Date</b>
<b><i>Individuals</i></b>			
I.1	Eugene S. Wilson	Eugene S. Wilson, Attorney at Law, 1224 North Ontare Rd, Santa Barbara, CA 93105	September 2, 2008
I.2	Tanne Kiele Chang	TKC Designs	September 8, 2008



**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS – M.S.#40  
1120 N STREET  
P. O. BOX 942873  
SACRAMENTO, CA 94273-0001  
PHONE (916) 654-4959  
FAX (916) 653-9531  
TTY 711

**Letter S.1**

Santa Barbara County Association of  
Governments – Regional  
Transportation Plan Review



*Flex your power!  
Be energy efficient!*

August 4, 2008

William Yim, Senior Transportation Planner  
Santa Barbara County Association of Governments  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

Dear William:

Subject: SBCAG 2008 Regional Transportation Plan

The Division of Aeronautics, reviewed the above referenced document with respect to airport-related impacts and regional aviation planning issues, and offers the following comments:

- The Division has determined that this document discusses applicable policies, goals and objectives to enhance the regional aviation system by strengthening support for airports, within the Action Element. Discussion of the regional airport system and a list of current facility information by airport have been adequately addressed (in chapter 1, Section 1.4.5 Aviation.) Identification of issues, needs and proposed actions for maintaining and/or improving the aviation system within Santa Barbara County has been reviewed with plans for continuous examination of probable improvements for the future.
- SBCAG has encouraged public involvement in this plan by holding four public workshops throughout the county and ensuring that these meetings were held at public venues, which were ADA transit accessible. Moreover, there was extensive outreach to the general, minority, low income and special needs populations as well as outreach to communities who support alternative transportation, (as described in chapter 1, Section 1.3.2, The Public Input Process.) SBCAG maintains a completed Public Participation Plan and in accordance with this plan, there will be a 45-day public comment period, as well as a legally noticed public hearing, which adequately fulfills the public participation requirements.
- The SBCAG RTP provides an assessment of ground access improvements for each primary airport within the county fulfilling the requirement of Senate Bill 2487, (as referenced in Chapter 4, Section 4.4.7.) Multi-modal needs connecting airport access to other forms of transportation have been considered with planned improvements, (dependant on adequate levels of funding.)
- The Division develops and biennially updates a ten year Comprehensive Improvement Program (CIP) as part of the California Aviation System Plan (CASP). Each Regional Transportation Planning Agency (RTPA) is responsible for preparing and submitting biennial updates for the airports within the county. The SBCAG project listings comprise the region's CIP for the CASP. The projects listed are those regionally significant projects over \$10,000 that could be eligible for federal, state, and/or local funding. In order for airport projects to obtain funding from the Aeronautics Account in the State Transportation Fund, the projects must be consistent with the CASP and RTP Action Element. The Airport projects listed in the SBCAG RTP, (found in Appendix D, pages 227-252), improve safety with better instrumentation and extended safety areas off runway ends, allow for increased storage of private aircraft in new hangars, improve access to taxiways, and provide for expanded terminal space.

S.1-1

- The SBCAG RTP describes funding options both with and without the passing of Measure D, (a reauthorization of Measure A). The Financial Element analyzes the costs of implementing the program of projects included in the Action Element. The SBCAG Financial Element fulfills the federal requirements that the plan is financially feasible. Moreover, SBCAG has estimated revenue projections that are reasonably expected to be available from known federal, state, and local sources of transportation funding to implement the projects.

- In the course of reviewing this document, we note that there was no mention of the new California Space Center targeted for completion (of the Environmental Assessment) in November of 2008. According to an article in "Spacebound! News and Information for California Space Authority Members and Stakeholders, Spring 2008, Volume 24," the new California Space Center, will be located on a 66-acre site outside the front gate of Vandenberg Air Force Base on Highway 1. The Space Center is anticipated to create 3,000 new jobs and generate federal, state and local tax revenues of at least \$335 million. The Center anticipates completion of this project in 3 phases. Upon completion of the first phase, the Center is expected to attract 200,000 visitors per year, with attendance expected to peak at 500,000 per year, (according to a completed feasibility study.) If this project is in fact moving forward, the SBCAG RTP will need to address the additional transportation needs of the facility, considering tourists, employees and any emergency vehicle transportation that may be occasionally required.

We strongly support this commitment on the part of Santa Barbara County to improve airports within the county and appreciate the adherence to required RTP guidelines.

Thank you for affording us the opportunity to review this document. Should you have any questions, please feel free to contact me at (916) 654-5253.

Sincerely,

Carol A. Glatfelter  
Associate Aviation Planner

Cc: David Murray, Sr. Transportation Planner  
Caltrans District 5  
Regional Planning and Development Review

*Letter S.1*

**COMMENTER:** Carol A. Glatfelter, Associate Aviation Planner, CALTRANS, Division of Aeronautics

**DATE:** August 4, 2008

Response S.1-1

The commenter describes numerous items and actions within the SBCAG RTP. In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

Additionally, the commentor identifies a development project, the California Space Center near Vandenberg Air Force Base, which will require additional transportation consideration. As this project has not been approved and is still undergoing review at this time, individual regional transportation planning to accommodate trips generated by this proposed facility would be premature. This Space Center project will require independent project-level environmental review of transportation impacts.

## PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013

## Letter S.2



RECEIVED

August 26, 2008

AUG 29 2008

Michael Powers  
Santa Barbara County Association of Governments  
260 N. San Antonio Road  
Santa Barbara, CA 93110

Santa Barbara County  
Association of Governments

Dear Mr. Powers:

Re: SCH# 2004081136; 2008 Regional Transportation Plan (RTP)

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.

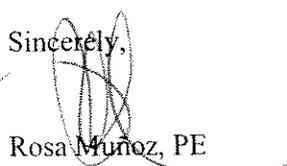
The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Completion & Environmental Document Transmittal-DEIR* from the State Clearinghouse. The RTP proposes many improvements requiring Commission authorization; therefore we should be listed under "2.5 PROJECT APPROVALS." These proposed improvements include: replacement of the Los Carneros overpass (GO-4), building a new at-grade crossing for Holly Avenue (C-PL-2), construction of the La Patera Road overpass from Calle Real (GO-PL-4), improvement of the Guadalupe crossing (GU-PL-2), widening of the Hollister Avenue overpass (SBC-PL-1), construction of the 7<sup>th</sup> and 4<sup>th</sup> Street crossing (C-PL-7), improvements of the Goleta Station (CT-16), and the construction of a multipurpose trail from HWY 101 along Jones and the Santa Maria Valley Railroad to railroad Avenue (SM-10).

As stated in General Order 75-D, the Commission's mission is to reduce hazards associated with at-grade crossings, and in support of the national goal of the Federal Railroad Administration, our policy is to discourage new and reduce the number of at-grade crossings on freight or passenger railroad mainlines in California. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way.

The individual project's lead agency should schedule a meeting with RCES, and the respective railroad to discuss mitigation measures and safety improvements for all these proposed crossing projects.

If you have any questions, please contact Varouj Jinbanchian, Senior Utilities Engineer at 213-576-7081, vsj@cpuc.ca.gov, or me at rxm@cpuc.ca.gov, 213-576-7078.

Sincerely,

  
Rosa Muñoz, PE  
Utilities Engineer  
Rail Crossings Engineering Section  
Consumer Protection & Safety Division

C: Dan Miller, UPRR  
Robert Himoto, SMVRR

S.2-1

*Letter S.2*

**COMMENTER:** Rosa Munoz, PE, Utilities Engineer, State of California Public Utilities Commission, Rail Crossings Engineering Section, Consumer Protection and Safety Division

**DATE:** August 29, 2008

Response S.2-1

The commenter notes that the California Public Utilities Commission Rail Crossings Engineering Section has jurisdiction over the safety of highway-rail crossings in California. The text on page 2-34 under the heading "2.5 PROJECT APPROVALS" has been modified to include the following:

**"• California Public Utilities Commission's Rail Crossings Engineering Section (RCES)"**



## DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

South Coast Region  
4949 Viewridge Avenue  
San Diego, CA 92123  
(858) 467-4201

## Letter S.3



September 2, 2008

Mr. Michael Powers  
Santa Barbara County Association of Governments  
260 N. San Antonio Rd. Suite B  
Santa Barbara, Ca 93110

**Subject: Notice of Completion of a Draft Environmental Impact Report for the  
Santa Barbara County 2008 Regional Transportation Plan SCH #2004081136**

Dear Mr. Powers:

The Department of Fish and Game (Department) reviewed the Draft Environmental Impact Report (DEIR) for the Santa Barbara County Association of Governments (SBCAG) 2008 Regional Transportation Plan (RTP) relative to impacts to biological resources. The RTP addresses the transportation needs for the SBCAG region through 2030. The purpose of the 2008 DEIR is to identify the potentially significant environmental effects of implementing the projects, programs, and policies included in the RTP.

The RTP includes general policy direction for countywide transportation as well as a listing of specific actions to be undertaken to meet the policy directives. Actions include various improvements to roadways and bikeways, improvements to transit, rail, and airport service, transportation demand management (TDM), intelligent transportation system (ITS), and alternative fuel projects.

Individual projects are preliminarily identified in the RTP; however, the DEIR is programmatic in nature and does not specifically analyze individual project(s). Project-level analyses would be prepared by implementing agencies on a project-by-project basis. Project specific planning and implementation undertaken by each implementing agency would depend on a number of issues, including: policies, programs and projects adopted at the local level; restrictions on federal, state and local transportation funds; results of feasibility studies for particular corridors; further environmental review of proposed projects.

The DEIR contains analysis of the environmental impacts from the RTP (the proposed project) and three alternatives which include 1) the Program Project, where the only project currently funded would be implemented; 2) the Modified Project, which would prioritize funding for projects and include only those projects that do not have potentially significant and unavoidable impacts; and 3) the No Project alternative, whereby no new regionally significant transportation improvements would be undertaken after 2008.

The Department prepared the following statements and comments pursuant to authority as Trustee Agency with jurisdiction over natural resources affected by the project under the California Environmental Quality Act (CEQA Section 15386) and Responsible Agency (Section 15381) over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq. regarding impacts to streams and lakes.

S.3-1

**Proposed Individual Projects**

The Department requests

- an "X" be added to the biological resources column in Table ES-2 Summary of 2008 RTP Project Impacts, and
- inclusion in Table 4.11-1 "RTP Projects That May Result in Biological Impacts" the following projects:

Project #	Location	Project Description
CT-7	Hwy 101 at Union Valley Parkway Interchange	Construct full interchange on Highway 101 at Union Valley Parkway
GO-4	Hwy 101 and Los Carneros Interchange	Widen approach to southbound ramp and replace Rail Road bridge
SHOPP 6	Countywide	Emergency Response Program
Local (HBP)(CT-14)	Countywide	Highway Bridge Replacement and Rehabilitation and Seismic Projects
B-PL-2	SR 246 at McMurray Rd	Align intersections from two successive intersections to one (McMurray Road/State Route 246 off ramp); provide additional lanes on approaches
C-PL-6	Hwy 101/150	Modification project to provide direct access to Via Real
C-PL-19	Carpinteria Ave Bridge	Reconstruct Bridge
Lom-PL-2	Hwy 1, North H St.	Widen from Central to Purisima Junction
SM-PL-1	Hwy 101 & SR 135 interchanges	Reconstruct Interchange and extend Broadway East, revise northbound ramps, widen overcrossing, add Park and Ride
SM-PL-2	Hwy 101 at McCoy Lane	Construction southbound off ramps; construction full interchange
Sol-PL-1	Highway 246/Alamo Pintado Rd. intersection	Widen highway, install roundabout or signals, and widen Alamo Pintado Bridge. Construct bicycle/pedestrian bridge at Alamo Pintado Creek to extend existing bikeway along Hwy 246 from Santa Ynez to Solvang.

S.3-2

SBC-PL-5	Clark Ave and Hwy 101	Relocate on and off ramps and install signals
C-1	Via Real at Sandy Land Reef Motel	Widen Via Real to accommodate Class II bike lane and construct Class I bike bridge eastbound at Carpinteria Creek south side of Via Real
SB-3	Loma Alta between Canon Perdido and Coronel Place	Construction of pedestrian walkway
SB-4	Mission St, Hwy 101	Widen bikeway, widen Mission Street, install bike lanes under Highway 101
GU-PL-3	Guadalupe St to Coastal Area along Santa Maria River	Construct multi-use levee/walkway
Lom-PL-3	South of Santa Ynez River from Lompoc Airport to Riverbend Park	Construct Class I bike path
SB-PL-2	Carrillo St from San Andreas St to Cliff Dr	Construct pedestrian path on both sides of Carrillo Street
SB-PL-3	Las Positas; Modoc Rd from Cliff Dr/Loma Alta; Canon Perdido to Coronel Place	Construct pedestrian path on both sides of Las Positas and one side of Loma Alta
SB-PL-4	Cabrillo Blvd	Construct Class II bike lanes and pedestrian pathways
SB-PL-5	Montecito St between Cliff Dr and Las Positas; Calle Real between Las Positas and La Cumbre and Cabrillo Blvd	Construct Class II bike lane and pedestrian pathways
SB-PL-6	Various locations within City of Santa Barbara	Construct Class II bike lanes and pedestrian pathways
SB-PL-7	SR 225/Las Positas Rd from Modoc Rd to Cliff Dr	Construct a pathway for bicycles and pedestrian uses
SB-PL-8	Outer State St at Hwy 101 overchange and Calle Real	Connect Class II bike lanes
SM-PL-16	Union Valley Parkway, Bradley Channel, Jones, Trail, Blosser Trail and from levee to La Brea	Construct commuter bikeway
Sol-PL-2	SR 246/Mission Dr from Hans Christian Anderson Park to western city limit	Construction Class I bike path from Hans Christian Andersen Park to west city

S.3-2

		limits
Sol-PL-4	SR246 from Nyborg to eastern city limit	Construct Class I bike path, Class II bike lane on south side of State Route 246
SBC-PL-3	Refugio Rd between Roblar Ave and Samantha Dr and Roblar Ave between Grand Ave and Refugio Rd	Extend Class II bike lane
SBC-PL-7	Harris Grade Rd from SR 1 to Burton Mesa	Widen road shoulders and construct Class II bike lanes. Provide connectivity to Regional Bikeway System
SBC-PL-8	West Main St to Guadalupe Dunes County Park	Construct Class II bike lane
CT-14	UPRR in Santa Barbara and Ventura Counties	Create new double track/sidings
CT-PL-28	Carpinteria to Santa Barbara	Construct new siding and switches
CT-PL-29	Surf(Lompoc) to Guadalupe	Installation of new siding
CT-PL-30	Ventura and Santa Barbara	Installation of new siding
SYA-1	Santa Ynez Airport	Construct far east apron and connecting taxiway
SYA-2	Santa Ynez Airport	Heliport Development
SYA-3	Santa Ynez Airport	Construct parallel taxiway and east ramp
LOMA-1	Lompoc Airport	Runway/Taxiway Overlay Extension: Overlay runway and taxiways to 22,000lbs per wheel and extend runway and taxiways 256 ft to final length of 4,856 ft
LOMA-2	Lompoc Airport	Construct 20 new hangars to accommodate new aircraft
SBA-1	Santa Barbara Airport	Expansion and remodel of existing terminal; Airside improvements
SBA-2	Santa Barbara Airport	Implementation of Master Plan Update; shift Runway 7-25 ft by 800 feet and construct safety areas and extend Taxiway A safety areas
SBA-3	Santa Barbara Airport	Construction of 24 nested t-hangars
SBA-4	Santa Barbara Airport	New Taxiway M
SBA-5	Santa Barbara Airport	Taxiway B Realignment
SMA-1	Santa Maria Airport	Modify passenger terminal,

S.3-2

		expand Holdroom and Baggage area
SMA-2	Santa Maria Airport	Improve infield access
SMA-3	Santa Maria Airport	Develop new air cargo facility, access road, building, and aircraft parking apron
SMA-4	Santa Maria Airport	Air Cargo Expansion, Phase 2
SMA-5	Santa Maria Airport	Extend Taxiway A
SMA-6	Santa Maria Airport	Extend Taxiway G
SMA-7	Santa Maria Airport	Construct Taxiway N
SMA-8	Santa Maria Airport	Extend Taxiway D
SMA-9	Santa Maria Airport	Develop new hangars
SMA-10	Santa Maria Airport	Improve Infield Road and Taxiway Access
SMA-11	Santa Maria Airport	Improve Infield Road and Taxiway Access, Phase 2
SMA-12	Santa Maria Airport	Extend Main Runway

S.3-2

The following is a list of comments on specific sections of the DEIR, including impact analysis, mitigation measures, and additional information recommended in the DEIR.

**Section 4.6 Impacts to Water Resources**

**Impact W-1 Construction and maintenance of RTP projects would incrementally increase countywide water demand. Such impacts would be Class II, *significant but mitigable*.**

The California Wildlife Action Plan (2005) identifies Water Management Conflicts as one of the key threats to wildlife diversity in California. Specifically, the document highlights activities that can "reduce the amount of water available for fish and wildlife, obstruct fish passage, and result in numerous other habitat alterations."

The Department disagrees with the finding that, "Such impacts would be Class II, *significant but mitigable*." The DEIR does not provide any regulatory framework to ensure that the mitigation measures are enforceable. If they are not feasible, and therefore not implemented, then the impacts should be treated as a cumulatively significant impact and categorized as Class 1 *significant and unavoidable*.

S.3-3

Furthermore, the increase in water demand should be analyzed in the DEIR with regard to potential for impacts to biological resources. Project specific analysis should address the potential for impacts to the water supply that would be used both for construction (e.g. dust suppression) activities, and operational impacts on water supply (e.g. landscaping irrigation). The Department recommends that language be included in section 4.11 stating that project-level analysis would be required for the potential to impact biological resources as a result of the incremental increase for countywide water demand.

**Mitigation W-1(b) The local jurisdiction in which a particular RTP project is located shall ensure that low water use landscaping (i.e., drought tolerant plants and drip irrigation) is installed. This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.**

The Department recommends the use of native species for landscaping to reduce the demand on water supplies for irrigation needs, and reduce the impact to existing native plants species and wildlife habitat.

**Mitigation W-2(a) The local jurisdiction in which a particular RTP project is located shall ensure that fertilizer/pesticide application plans for any new right-of way landscaping are prepared to minimize deep percolation of contaminants. This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.**

S.3-3

The Department recommends the fertilizer/pesticide application plans require the use of products that are safe for use in and around aquatic environments.

#### Section 4.11 Impacts to Biological Resources

##### **Regulatory Framework**

In the 5<sup>th</sup> paragraph, the DEIR states: "Local state fish and game agencies must also be consulted regarding the issuance of Section 404 permits. The California Department of Fish and Game (CDFG) is considered a trustee agency under CEQA with the responsibility of protecting the biological resources of California. The CDFG also has authority under Section 1600 et. seq. of the Fish and Game Code to reach an agreement regarding conservation of fish and wildlife resources whenever a project alters the natural flow or bed, channel, or bank of any river, stream, or lake."

S.3-4

The Department agrees with the text regarding the issuance of a Streambed Alteration Agreement, however this paragraph could be misleading to readers and mis-interpreted to mean that only projects subject to the federal 404 permitting process would be subject to a SAA under FGC §1600 et seq. The SAA is required for a project regardless of whether or not the affected "waters" fall under federal jurisdiction subject to the 404 permitting. The department recommends this paragraph be clarified accordingly.

##### **Impacts to movement of wildlife**

The DEIR refers to threshold criteria from Appendix G of the CEQA Guidelines, which requires analysis to determine if the project will "Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites;"

The Department stresses the importance of analyzing project impacts to wildlife corridors during planning for each individual transportation project. Impacts often stem from project features including but not limited to: fencing, median barriers, undersized culverts, channelization and/or constriction of streams at crossings, erosion control, lighting, and more. The Department recommends wildlife movement impact analysis be addressed on the scale of cumulative impact analysis. This will assist in avoiding adverse impacts from linear projects that have potential for impacts on a broader scale, or projects that may impact critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. A comprehensive analysis is very important since the expenditure of public resources to acquire lands within identified movement corridors may be compromised by one poorly placed project within a wildlife corridor or linkage.

S.3-5

The Department recommends including language in the DEIR Section 4.11 to specify the need for project-specific and cumulative analysis of potential for impact to wildlife corridors, and that the analysis address both temporary (construction) and permanent (operations and maintenance) impacts.

S.3-5

### **Impacts to Steelhead Migration**

The DEIR refers to threshold criteria from Appendix G of the CEQA Guidelines, which requires analysis to determine if the project will "Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites."

The SBCAG RTP includes proposed projects that would require funding from the California Transportation Commission (CTC) and design oversight and approval by the California Department of Transportation (Caltrans). The purpose of the RTP update is to "reflect changes in legislative requirements, local land use policies, and resource constraints." Attention is directed to recent changes in legislation (SB 857), the passage of which resulted in changes to the California Streets and Highways Code (§156-156.4) and the California Fish and Game Code (§5901).

Specifically, §156.3 of the Streets and Highways Code requires:

- an assessment of potential barriers to fish passage is done prior to commencing project design,
- remediation of the problem shall be designed into the project by the implementing agency, and
- new projects shall be constructed so that they do not present a barrier to fish passage

S.3-6

Section 156.4 states:

"For any repair or construction project using state or federal transportation funds that affects a stream crossing on a stream where anadromous fish are, or historically were, found, the department (of transportation) shall perform an assessment of the site for potential barriers to fish passage and submit the assessment to the Department of Fish and Game."

FGC §5901 states that "it is unlawful to construct or maintain in any stream . . . any device or contrivance that prevents, impedes, or tends to prevent or impede, the passing of fish up and down stream."

It is the policy of the Fish and Game Commission that "Existing anadromous rainbow trout habitat shall not be diminished further without offsetting mitigation of equal or greater long-term habitat benefits. All available steps shall be taken to prevent loss of habitat, and the Department shall oppose any development or project that will result in irreplaceable losses. Artificial production shall not be considered appropriate mitigation for loss of wild fish or their habitat."

Any proposed project within the RTP that would involve construction at a stream crossing would be required to comply with Streets and Highways Code §156-156.4 and FGC §5901 and Fish and Game Commission policy. Early coordination with the Department is highly recommended for any transportation project affecting a stream crossing.

The Department recommends these regulations be referenced in section 4.11.1(c) Regulatory Framework of the DEIR and that each project in the RTP be evaluated for the potential to impact migration of steelhead, as applicable.

### **Impacts to Sensitive and Special Status Plant and Wildlife Species**

Section 4.11.1(b) and Figure 4.11-1 depict numerous sensitive and special status plant and wildlife species with the potential to occur throughout the SBCAG project area. Section 4.11.1(b) states "for these state-listed special status biological resources, mitigation measures must be implemented to bring project impacts below the level of significance under CEQA."

Neither Impact B-1 nor Impact B-2 address the potential for impact to Threatened and Endangered species or species that meet the definition of "rare" under CEQA. As stated in 4.11.1(b) mitigation measures must be implemented to bring project impacts below the level of significance under CEQA.

The Department recommends adding Impact B-3 within section 4.11 of the DEIR to address the potential for impact to sensitive and State Threatened and Endangered Species, and include the relevant class of impact.

### **Permanent Impacts**

Neither Impact B-1 nor Impact B-2 state that permanent impacts to sensitive plant species and wildlife habitat could potentially occur as a result of implementation of some of the listed projects. Widening a road, expanding the footings of a bridge, development of bike paths, etc. would all be considered additional (permanent) facility footprint, in some cases occurring on undisturbed lands adjacent to the existing facilities. In addition, expansion of facilities, and construction of new facilities could have long-term operational impacts due to the increase in nitrogen oxide (NOx) pollutants derived from the significant increase of motor vehicles and other growth inducing NOx sources that would be accommodated by implementation of the RTP. The deposition of atmospheric NOx pollutants is a contributor to increased levels of nitrogen-based nutrients in soils and induces the growth of invasive exotic vegetation into areas which normally support low nutrient levels. Increased deposition of atmospheric NOx into drainages may also contribute to eutrophication of aquatic ecosystems resulting in reduction of biodiversity and function. Furthermore, implementation of some of the proposed projects in the RTP could result in the introduction of invasive non-native plant species into inaccessible and undisturbed natural areas and increased ignition sources from vehicles and human sources, which may result in the type conversion of native vegetative communities into non-native ruderal habitats of reduced biological diversity.

The Department recommends adding Impact B-4 within section 4.11 of the DEIR to address the potential for permanent impacts to biological resources, and that project-specific analysis would be required.

### **California Endangered Species Act (CESA)**

A California Endangered Species Act (CESA) Permit must be obtained if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will

S.3-7

S.3-8

S.3-9

Michael Powers  
September 2, 2008  
Page 9 of 9

meet the requirements of a CESA permit (Title 14 §783.3). For these reasons, the following information would be requested for each project with the potential to affect a listed species:

Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.

S.3-9

A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

### Fully-Protected Species

The Department recommends including language in the DEIR section 4.11.1(c) stating that take of Fully-Protected birds (FGC §3511), mammals (FGC §4700), reptiles and amphibians (FGC §5050), and fishes (FGC §5515) is prohibited by law and a permit may not be issued authorizing take of Fully-Protected Species. Avoidance measures shall be incorporated into project design, specifications and, operations in order to avoid take of Fully-Protected species.

S.3-10

### 1600 Streambed Alteration Agreement (SAA)

The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent, ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.

The Department requires a streambed alteration agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement may be a project that is subject to CEQA. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the 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 agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

S.3-11

Thank you for this opportunity to provide comment. Please include the above concerns and comments into the final EIR for the subject project. Please contact Mr. Sean Carlson, Staff Environmental Scientist at (909) 596-9120 for any questions and further coordination.

Sincerely,



Edmund J. Pert  
Regional Manager  
South Coast Region

cc: Helen Birse, Los Alamitos  
Betty Courtney, Santa Clarita  
Natasha Lohmus, Carpinteria  
Martin Potter, Ojai  
Scott Morgan, State Clearinghouse, Sacramento

Letter S.3

**COMMENTER:** Edmund J. Pert, Regional Manager, California Department of Fish and Game, South Coast Region

**DATE:** September 2, 2008

Response S.3-1

The commenter summarizes the project and DEIR and notes that the DEIR is a program-level document that does not specifically analyze individual RTP projects. This is correct. The lead agencies for individual projects proposed as part of the draft RTP will analyze each project in subsequent project-level environmental reviews, as required by CEQA.

Response S.3-2

The commenter lists a number of individual RTP projects that he believes should be checked as having potential biological resource impacts. The commenter's opinion is noted; however, the purpose of the summary of projects with potential impacts in the various issue areas studied in the DEIR is to highlight those issue areas where significant impacts are considered likely to occur, such as where a project would involve a creek crossing. Although it is possible that the individual projects listed by the commenter would have biological resource impacts, SBCAG staff believe that the likelihood of identifying significant biological resource impacts for these projects is low since the projects listed by the commenter are generally within already disturbed areas, including urban areas and airports. It should also be noted that all projects will be required to undergo project-specific environmental review, including analysis of all relevant environmental issues, regardless of whether or not a particular potential impact is identified in the DEIR for the RTP.

Response S.3-3

The commenter suggests that implementation of water supply mitigation measures cannot be assured and recommends the inclusion of language specifying that project-level analysis will be required for individual projects to address impacts relating to water demand. The mitigation measures included in the DEIR will become requirements that apply to all relevant RTP projects and, therefore, will be implemented in accordance with an adopted mitigation monitoring and reporting program (MMRP). Local agencies will be responsible for implementing the measures, but the MMRP will specify how each measure is to be implemented. In response to this comment, the third and fourth paragraphs under Impact W-1 are revised to read as follows:

*According to the County's Groundwater Thresholds Manual, an acre of groundcover, shrubs and trees requires between 1.5 and 1.8 acre-feet of water per year. Although the increase in landscaped areas resulting from individual RTP projects cannot be precisely estimated, it can be assumed that watering demands increases ~~of such areas~~ in locations with overdrafted groundwater basins would occur. Several major RTP projects are located in areas served by the Santa Maria, Lompoc, Santa Ynez, San Antonio, and Cuyama Basins, all of which are in a state of overdraft. Although several of the major urbanized areas throughout the county currently use reclaimed water for transportation facility landscaping, in more remote areas reclaimed water*

*sources are not located within a reasonable distance. As such, it may not be economically feasible to convey reclaimed water to outlying areas. In such instances, lead agencies for individual RTP projects will need to consider and, as necessary, mitigate potential water supply impacts as part of future project-specific environmental reviews.*

*Major RTP projects, particularly roadway extensions, could also affect groundwater supplies by incrementally reducing groundwater recharge potential. This reduction in groundwater recharge could occur because the impermeable surfaces associated with the proposed improvements would increase surface water runoff at the expense of natural infiltration. ~~While~~ The magnitude and significance of such an impacts associated with individual RTP projects cannot be accurately determined at this programmatic stage of analysis; nevertheless, given the overdrafted nature of some of the county's groundwater basins, the reduction in groundwater recharge is considered to be potentially significant. The lead agencies for individual RTP projects will need to consider potential groundwater recharge impacts as part of future project-specific environmental reviews.*

In addition, measures W-1(b) and W-2(a) are revised to read as follows:

**W-1(b)** *The local jurisdiction in which a particular RTP project is located shall ensure that low water use landscaping (i.e., drought tolerant plants and drip irrigation) is installed. When feasible, native plant species shall be used. This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.*

**W-2(a)** *The local jurisdiction in which a particular RTP project is located shall ensure that fertilizer/pesticide application plans for any new right-of-way landscaping are prepared to minimize deep percolation of contaminants. The plans shall specify the use of products that are safe for use in and around aquatic environments. This shall be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review.*

#### Response S.3-4

The commenter states an opinion that a paragraph regarding CDFG's regulatory role is misleading. In response to this comment, the fifth paragraph under "Regulatory Framework" in DEIR Section 4.11, Biological Resources, is revised to read as follows:

*~~Local state fish and game agencies must also be consulted regarding the issuance of Section 404 permits.~~ The California Department of Fish and Game (CDFG) is considered a trustee agency under CEQA with the responsibility of protecting the biological resources of California. The CDFG ~~also~~ has authority under Section 1600 et. Seq. of the Fish and Game Code to reach an agreement regarding conservation of fish and wildlife resources whenever a project alters the natural flow or bed, channel, or bank of any river, stream, or lake.*

#### Response S.3-5

The commenter emphasizes the importance of analyzing impacts to wildlife corridors and recommends adding language to the DEIR specifying the need for project-specific analysis of such impacts. In response to this comment, the following paragraph is added at the end of the discussion under Impact B-2 of Section 4.11:



*Project-specific and cumulative analysis will be needed for individual RTP projects with the potential to disrupt wildlife movement. This analysis will need to consider both temporary impacts relating to construction activity and long-term impacts relating to the operation and maintenance of individual projects.*

#### Response S.3-6

The commenter notes recent changes to the California Streets and Highways Code and the California Fish and Game Code, and recommends that a discussion of these regulations and analysis of impacts to steelhead be included in the EIR. Section 4.11 of the DEIR includes a listing of RTP projects with the potential for significant biological resource impacts, including projects that involve stream crossings or other potential alterations that could affect steelhead and other riparian species. In response to this comment, the following is added as the seventh paragraph under "Regulatory Setting" in Section 4.11:

*Section 156.3 of the California Streets and Highways Code requires assessment and remediation of potential barriers to fish passage for transportation projects using state or federal transportation funds. Such assessments must be conducted for any projects that involving stream crossings or other alterations and must be submitted to the CDFG.*

#### Response S.3-7

The commenter recommends that the DEIR include specific analysis of impacts to rare, threatened, and endangered species. The discussion under Impact B-2 is intended to encompass potential impacts to these special status species, which are shown on Figure 4.11-1. In order to clarify this point, Impact B-2 is revised to read as follows:

**Impact B-2** *Some proposed transportation projects could permanently alter natural habitat areas, ~~and~~ wildlife corridors, and special status plant and animal species. Impacts of many individual projects can likely be mitigated to a less than significant level. However, because the feasibility of mitigation cannot be determined at this time, the cumulative effect of RTP implementation is considered Class I, significant and unavoidable.*

In addition, the second paragraph under Impact B-2 is revised to read as follows:

*Several individual projects would, however, increase human activity in areas where significant biological resources could occur. In particular, several of the proposed bikeway projects in the Gaviota, Goleta, Santa Maria, and Carpinteria areas could increase human activity in the vicinity of riparian areas, wildlife corridors, and potentially sensitive coastal habitats. These types of habitats may be inhabited by a range of special status plant and animal species, as illustrated on Figure 4.11-1. In addition, several of the proposed new roads and road widenings in the Santa Maria/Orcutt area could involve removal of various tree species and grasslands. Though proposed road projects would not necessarily create significant impacts to biological resources, the introduction of more human activity into potentially sensitive areas would increase the potential for both temporary (construction) long-term conflicts with sensitive plant and wildlife species. Impacts could result from direct habitat removal, increased deposition of*

*atmospheric pollutants, and/or introduction of invasive nonnative plant species into currently undisturbed natural areas. The significance of potential impacts would need to be addressed on a case-by-case basis through site-specific studies as individual projects are developed. Though it appears likely that impacts could be mitigated through careful site planning and post-construction restoration, impacts are considered potentially unavoidable.*

#### Response S.3-8

The commenter suggests that the DEIR analysis does not explicitly identify permanent impacts to sensitive plant and animal species and recommends adding discussion of such impacts. The discussion under Impact B-2 is intended to address these impacts. Please see the revised text under Response S.3-7 for clarification of this point.

#### Response S.3-9

The commenter notes CEQA requirements pertaining to the issuance of CESA permits and requests specific information for each project with the potential to affect a listed species. The informational items requested by the commenter (mitigation monitoring and reporting requirements for project-specific mitigation measures and mitigation agreements and plans) will be developed as part of the future project-specific CEQA documentation to be prepared for individual RTP projects.

#### Response S.3-10

The commenter recommends including language regarding fully protected species in the EIR. In response to this comment, the following is added as the eighth paragraph under “Regulatory Setting” in Section 4.11:

*Take of fully-protected birds, mammals, reptiles, amphibians, and fishes is prohibited by state law. Avoidance measures must be incorporated into the design, specifications, and operation of individual projects in order to avoid take of fully-protected species.*

#### Response S.3-11

The commenter states opposition to elimination of watercourses and notes CDFG requirements with respect to issuance of streambed alteration agreements. This opposition to elimination of watercourses is noted. The lead agency for individual RTP projects will consult with CDFG as appropriate in order to ensure that individual projects reduce impacts to fish and wildlife resources to the degree feasible.

**DEPARTMENT OF TRANSPORTATION**

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**Letter S.4**

*Flex your power!  
Be energy efficient!*

September 2, 2008

Mr. Jim Kemp, Executive Director  
Santa Barbara County Association of Governments  
260 N. San Antonio Road – Suite B  
Santa Barbara, CA 93110

2008 Draft Regional Transportation Plan and Draft Environmental Impact Report

Dear Mr. Kemp:

Thank you for the opportunity to review the Santa Barbara County Association of Governments (SBCAG) draft Regional Transportation Plan (RTP) and draft Environmental Impact Report (DEIR). We appreciate the effort that this requires, and we hope that our input is constructive in support of a strong RTP that meets its intended purpose.

We have identified a few themes that surfaced during our review.

1. Highway 101 is of vital importance to the region and we suggest more emphasis on this in the RTP. While the document speaks well to an integrated multimodal system, the role of the US101 corridor could be reinforced as it provides the foundational support to this system. This could be reflected, for example, in the policy element where the only stated priority for STIP funding is Highway 246.
2. The RTP would benefit from clarification of the relationships between SBCAG, Caltrans and the California Transportation Commission. These partnerships are critical for accomplishing our mutual goals to support an efficient transportation system. Such clarification would facilitate the discussions about bikeways, rail, safety improvements, and certain funding programs.
3. The RTP should be strengthened in its consideration of environmental mitigation needs early in the planning process and in the consultation with resource agencies to develop effective strategies consistent with SAFETEA-LU.

More specific comments are enclosed and comments from the Division of Aeronautics have been sent under separate cover.

S.4-1

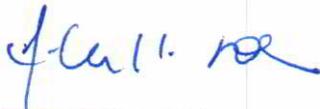
Mr. Jim Kemp  
September 2, 2008

Page 2

I do hope these comments are helpful to you in finalizing the RTP and EIR. We are available to continue working with you to expeditiously achieve the final products.

If you have any questions, please feel free to contact Pat Mickelson of my staff.

Sincerely,



AILEEN K. LOE  
Deputy District Director  
Planning and Local Assistance

Enclosure

**COMMENTS ON DRAFT REGIONAL TRANSPORTATION PLAN:**

1. The RTP does a good job of identifying proposed projects, transportation benefits, environmental resources, potential impacts, and the need for project mitigation. To be consistent with SAFETEA-LU, the RTP should take the next step to identify areas suitable for mitigation (also referred to as advance regional mitigation) and discuss early coordination with resource agencies and conservation groups.

The benefit of this is to facilitate project delivery. Consultation with resource agencies during the RTP development helps ensure early consideration of their concerns thereby avoiding or minimizing delays later on in the project delivery process. Opportunities to provide advanced regional mitigation for planned transportation projects in the RTP that also meet conservation goals should be explored in coordination with resource agencies and local conservation organizations. A link should be made between the conservation efforts discussed in the RTP and possible mitigation strategies for the unavoidable impacts of projects identified in the RTP.

S.4-1

2. In Section 1.3.3 Consultation reference is made to the draft Environmental Impact Report (DEIR) for a comparison of the RTP to the California State Wildlife Action Plan. However, the DEIR doesn't incorporate enough details from the Wildlife Action Plan to compare it to the projects in the RTP. If more detail was provided, mitigation strategies could be developed that support the needs identified in the Wildlife Action Plan and provide a platform for early collaboration. For example, one major discussion that is missing is how proposed projects could impact wildlife connectivity in the region, which is one of the issues in the Wildlife Action Plan.

S.4-2

3. The RTP needs to consider provisions for the development of the California Coastal Trail in the coastal areas of Santa Barbara County. Assembly Bill 1396 (approved in 2007) established the expectation for Regional Transportation Planning Agencies to coordinate with appropriate agencies for the development of the California Coastal Trail and include such provisions in their RTPs.

4. In Section 2.2.9 Infrastructure Maintenance/Repair reference is made to concerns expressed by local agencies about maintenance of state highways in their jurisdiction. The 10-Year SHOPP Plan identifies needs and is updated every two years. Projects that are successful in statewide competition are included in 4-year programming cycles adopted every two years by the California Transportation Commission (CTC). While CT solicits input to the SHOPP, only Caltrans (CT) can nominate projects for funding from the SHOPP; please correct the language in the RTP to reflect this.

S.4-3

On a statewide basis, the SHOPP program is heavily oversubscribed (annual needs exceed available funding by approximately six times.) It might be noted that the measure of performance for maintenance quality on state highways (maintenance level of

service) in District 5 is among the highest in the state. However, because state funding cannot meet all the needs, local jurisdictions and SBCAG may choose to invest other funds on certain high priority improvements. Local jurisdictions also may choose to take full responsibility for certain state highways through the relinquishment process.

5. In Section 2.5.1 Bikeways-Interagency Jurisdiction the statement that “Caltrans is responsible for bikeways on the state highway system” requires some clarification. In the context of existing facilities, as owner-operator of the state highway system Caltrans is responsible for maintenance and operations, unless a separate maintenance agreement exists with a local jurisdiction. However, new facilities on the state highway system would come about through a partnership with SBCAG and the local jurisdiction. SBCAG and local jurisdictions are largely responsible for funding new pedestrian and bicycle facilities.
6. In Section 2.8 Rail, please introduce Caltrans’ role in managing and coordinating the intercity passenger rail service. CT manages the Pacific Surfliner service that is operated by Amtrak. Funding for the Pacific Surfliner is programmed in the ITIP portion of the STIP that is adopted by the CTC.
7. In Section 2.8.1 Passenger Rail please augment the discussion about adjusting the Pacific Surfliner schedule to commute-friendly hours by acknowledging some of the issues that need to be addressed. The RTP identifies travel time as an important determining factor; other equally important factors include on-time performance (reliability of service) and fares. The change in the schedule has consequences worth mentioning such as the potential impact on the Coast Rail Coordinating Council’s efforts to re-establish Coast Daylight passenger service between Los Angeles and San Francisco.
8. In Chapter 3, Goals, please include consideration of the state’s goals to reduce greenhouse gas emissions and overall vehicle miles traveled as discussed in the *Addendum to the 2007 RTP Guidelines* adopted by the California Transportation Commission.

Please also include a goal or policy that emphasizes the vitality and importance of the Highway 101 corridor to the region. In this section, or elsewhere, emphasis on the Corridor System Management Plan (CSMP) for the Highway 101 corridor could be highlighted. The goal for corridor management is to maximize the efficiency of the existing system.

In this section, or elsewhere, please consider acknowledging and supporting Caltrans initiating a planning effort with SBCAG and Santa Barbara County to examine Highway 101 along the Gaviota Coast to preserve its remaining capacity and maintain its operational integrity.

Please review this chapter for consistency—Section 3.2 (Goals I-VI) and Section 3.3 (Goals 1-8) appear to identify a slightly different set of goals. For example, how is SAFETEA-LU Planning Factor 5 carried through? It appears to be referenced in Section 3.2 (Goal VI), but doesn’t seem to carry into Section 3.3.

S.4-3

9. In Section 3.3.7 Pedestrian Facilities, please include additional emphasis on ADA accessibility. The RTP should anticipate development of a Transition Plan by each jurisdiction to make public rights of way accessible (which is not limited to pedestrian facilities). Future federal funding will require that an ADA Transition Plan be in place. Section 4.5.2 Pedestrian Travel may be another appropriate place to include emphasis on ADA Transition Plans.
10. In Section 4.3.1 South Coast it is implied that adjusting the Pacific Surfliner schedule to commute-friendly hours has already occurred. As mentioned in comment #7 above there are numerous issues that must be addressed to increase passenger rail service in the corridor. Increasing service will arrive through a partnership of Caltrans, SBCAG, Ventura County Transportation Commission and other key stakeholders.
11. In Section 4.3.1 South Coast, Map 4.1 shows the various projects that are to be constructed along Highway 101 in the South Coast over the next several years and refers to each project as Phases 1, 2, 3 and 4. However, the text discussion below the map is of the 101/Milpas to Hot Springs project and it also includes a discussion of the various phases for that project and concludes with phase 4. Perhaps the wording should be changed somewhat so as not to confuse the phases mentioned in the text with the phases mentioned on the map.
12. In Section 4.4.6 System Safety. Please identify the role that Caltrans has to ensure the safety of the traveling public. The collaborative efforts identified in the RTP are vital in the overall scheme to promote safety (e.g., SR 166 Task Force, SR2S). Caltrans, as owner-operator of the State Highway System, gives its highest priority for SHOPP program funds to safety improvement projects.
13. In Section 4.4.9 Environmental Mitigation the RTP should include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities. Activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan could be identified. As mentioned above (comment #1) these discussions are to be developed in consultation with federal, state, and tribal governments, wildlife, land management, and regulatory agencies. We recommend countywide efforts (such as the Regional Conservation Guide mentioned in the RTP) be considered.
14. In Section 4.5.1 Roadway & Bikeway System—we'd like to suggest that the State Highway System section be revised and specifically request that reference to a "state system CIP" be removed. While inclusion in the ITIP is one way that the state makes a commitment to build projects, we would like to suggest language that may help clarify the partnership between Caltrans, SBCAG and the CTC.

S.4-3

*Caltrans is the owner-operator of the state highway system. SBCAG and Caltrans work together to identify deficiencies of the system, establish priorities and work to secure funding to meet the greatest needs. Caltrans identifies needs and deficiencies in several ways: System Plans (such as Route or Transportation Concept Reports, Corridor System Management Plans, the Interregional*

*Transportation Strategic Plan) and the 10-Year SHOPP and identification of unmet needs.*

*The purpose of the SHOPP is to maintain and preserve the investment in the California State highway system and its supporting infrastructure. Capital improvements programmed in the SHOPP are limited to maintenance, safety and rehabilitation of the transportation infrastructure that does not expand system capacity. The highest priority for programming in the SHOPP is safety. CT nominates projects to be funded with SHOPP funds.*

*The state's commitment to build projects is supported by the adoption of the STIP by the CTC. The allocation of the STIP (comprised of 75% RTIP and 25% ITIP) is a joint venture with the regional transportation planning agencies. SBCAG, in coordination with Caltrans, establishes priorities and nominates projects to receive its share of the STIP (RTIP) and Caltrans nominates projects to compete statewide for the ITIP.*

*The CTC can only program projects that are in the Regional Transportation Plan; therefore, the partnership of CT and SBCAG together with its member jurisdictions (cities and counties) is critical for promoting the safe and efficient operation and management of an integrated multi-modal transportation system.*

S.4-3

15. In Section 5.2.2. State Funding, this discussion could be clarified to acknowledge that the distribution of funds by the CTC is consistent with the overall priority to support maintenance and preservation (including safety) of the existing transportation system through the SHOPP (see above comment to Section 4.5.1). Funding to expand the system is supported by the STIP, which is allocated on a 75/25 basis to the RTIP/ITIP respectively. SBCAG and Caltrans identify priorities and nominate projects to receive funds from the RTIP and ITIP respectively. The CTC adopts the STIP every two years.

This section also identifies fuel tax and transportation bonds as sources of state funds. The SHOPP, however, is a funding program rather than a source of funds, per se. The SHOPP program should not be considered a limitation on the investments that can be made to maintain and preserve the system, which might be implied by the statement “The State Highway System will only be preserved to the level of funding provided by the state (SHOPP).” Other sources of funds may be invested for system preservation (including operational improvements) such as RTIP, local funds and fees collected to offset development impacts. For purposes of the RTP, we suggest the following:

- Add a reference to the 10-Year SHOPP Plan identifying overall needs to preserve and maintain the system in Santa Barbara County (to be provided under separate cover)
- Maintain the reference to projected funding (as now included)
- Identify the difference between the needs and future allocations as unmet needs.

16. On Table 5.2 Estimated Project Costs by Mode, please clarify what is meant by “Program” and by “Plan” with regard to Construction and Maintenance.
17. In Chapter 6, Table 6.1 contains many mobility measures and identifies transit agencies as the data source for ADA complaints. Please include an expectation that all agencies managing public rights of way must respond to complaints and must produce and implement an ADA Transition Plan.
18. Appendix D contains projects that are currently under construction. Please consider identifying projects that are now under construction separately or include them in the list of accomplishments.
19. Appendix D would be easier to follow if the route and possibly postmiles were included. For example, the CMIA project (CT 8) doesn’t identify the project as being on Highway 101 in the project description. For projects on the State Highway System, consider a method to consistently identify the route number. It may also help to group the improvements in Appendix D by type instead of mixing (e.g., transit, bike-pedestrian and highway projects.)
20. Appendix D appears to contain several projects for funding in the SHOPP that are not eligible to receive SHOPP program funding, such as CT-PL-14 and Sol-PL-1.
21. On page 4 of the Executive Summary, under Evaluation, the first bullet states: “(W)ith the full widening of US 101...coupled with various operational improvements and travel demand management measures...peak hour congestion...will be reduced to below capacity with no delay.” What are the land-use assumptions that support this finding?
22. On pages 4 and 5 of the Executive Summary (and at various other locations in the document), the 2030 No Build does not appear to include the Highway 101 six-lane project in Santa Maria. The fact that this widening project is well underway seems that it should, de facto, be included in the No Build.
24. On page 2-21, Section 2.2.13, Goods Movement, Freight, you may want to consider updating the reference to the federal regulations. You might also want to mention AMBAG’s proposal (seeking funds) to conduct, in consultation with SBCAG and SLOCOG, a commercial flow study that recognizes the importance of goods movement up and down Highway 101 on the Central Coast between Los Angeles and the San Francisco Bay Area.
25. On page 2-44, Section 2.6.1 Existing Transit Service Needs, third paragraph, the UCSB student population appears to be overlooked in the discussion of the transit dependent.
26. On page 2-49 there is a discussion of funding of transit with 5307 funds. This discussion should also include 5311 funds for rural areas.

S.4-3

- 27. On page 6-17, Section 6.2.1.2 there is no mention of the proposed development east of Route 101 in the Santa Maria area that is the purpose and need for the McCoy interchange.
- 28. On page 6-28 the total number of households on Table 6.4 does not agree with the total number of households on page 6-39, Table 6.7 although the source appears to be the same (2000 Census).
- 29. In Appendix D, CT-IL-7, should Highway 101 be Highway 1 in the project description: “widen Hwy 135 to 6 lanes from Santa Maria Way to Rte 135 /Hwy 101 separation”? Please confirm the appropriate sponsor and implementing agency for this project.

S.4-3

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**

- 1. Although the DEIR indicates that farmland impacts cannot be mitigated, our staff has experience in developing criteria for mitigating transportation project impacts on farmland. We are available to share with you our experiences and lend assistance, as needed.
- 2. Please include documentation of coordination with resource agencies. The documentation may include reference to specific meetings, outcomes, comments and input to the RTP from each agency. While the DEIR includes a letter from the Department of Fish and Game in response to SBCAG’s Notice of Preparation, its purpose is limited to providing input to what should be addressed in the EIR and does not include specific coordination on proposed projects and mitigation as intended by SAFETEA-LU.

S.4-4

The DEIR identifies consultation with the California Natural Diversity Database (CNDDDB), and includes mapping showing the location of sensitive species and mentions the Wildlife Action Plan. Please include a comparison of the RTP with conservation plans/maps and inventories.

S.4-5

The DEIR should also document coordination with local conservation organizations and address the potential for linking RTP project mitigation with conservation needs and opportunities on a watershed or regional level. The DEIR could include mention of the Conception Coast Project that created the Regional Conservation Guide discussed on page 4-14 of the RTP. One possible suggestion would be to overlay this mapping with the California Natural Diversity Database and the proposed projects.

- 3. On pages 2-9 and 2-13, Tables 2-1 and 2-2 lists CT-PL-11, CT-PL-34, B-PL-1, B-PL-2, C-PL-1 and CT-PL-14, as being funded through the SHOPP. These are not SHOPP funded projects nor are they candidates for SHOPP funding.

S.4-6

- 6. On page ES-10, Impact AES-2, the aesthetics impact may be too sweeping and overly general. In some instances a roadway improvement has little to no effect on overall character of the setting and context.

S.4-7

- 7. On page ES-16, Impact B-2, the biological impact seems overly cautious and too sweeping. Many transportation projects are constructed wherein we are able and willing to mitigate habitat impacts to a “less than significant” level. S.4-8
- 8. On page 2-22 it is stated at the end of the first paragraph under “Road/Bikeway Improvements” that “projects within each jurisdiction...were prioritized by order of importance based on the jurisdiction’s input.” Please confirm this statement. Projects submitted by Caltrans were prioritized by year of construction, rather than by importance. Were the projects submitted by local agencies prioritized in order of importance? S.4-9
- 9. On page 4.1-8, table 4.1-2 shows information dating back to 2003. Since the CMP requires annual performance monitoring of CMP facilities, please include more recent data. S.4-10
- 10. On page 4.1-18, the second paragraph refers to deficiencies on US 101 between Clark Ave and Santa Maria Way. That segment should be included in Table 4.1-6. S.4-11
- 11. On page 4.4-4 is a statement that “twelve trains per day operate between Oxnard and Goleta while ten trains per day operate between Goleta and San Luis Obispo.” The LOSSAN North Strategic Plan (December 2007) indicates that there are five roundtrips (or 10 trains total) from Los Angeles to Santa Barbara with two roundtrips (or 4 trains total) continuing to San Luis Obispo. S.4-12

*Letter S.4*

**COMMENTER:** Aileen K. Loe, Deputy District Director, California Department of Transportation, Planning and Local Assistance

**DATE:** September 2, 2008

Response S.4-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

Response S.4-2

As described in Section 4.11, *Biological Resources*, of the Draft EIR, the California State Wildlife Action Plan recommends region-specific conservation actions based on known stressors to at-risk species and sensitive habitats, including oak woodlands, vernal pools, wetlands, coastal salt marshes, riparian habitats, native grasslands, and species listed in the California Natural Diversity Database (CNDDB). Each of these resources has been considered in this assessment of potential significant impacts due to proposed RTP projects.

The RTP Update EIR is a Program level evaluation rather than a design-level project evaluation. As described in Section 15146 of the CEQA Guidelines, "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." Additional detail regarding a comparison of individual RTP transportation projects to Wildlife Action Plan goals could be provided at a project-level of detail as part of independent environmental review once development plans are available for such projects. With design level details, a precise evaluation of the effects of individual transportation projects on habitat connectivity could be provided.

Response S.4-3

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

Response S.4-4

As described in Impact LU-4 in Section 42, *Land Use*, of the Draft EIR, although the actual level of impact from individual transportation projects is not known at this time, the overall impact to agriculture is assumed to be Class I, Significant and Unavoidable. Although recommended mitigation measures would reduce impacts to agriculture to the degree feasible, such impacts cannot be fully mitigated due to the potential conversion of agricultural lands in Goleta, Santa Maria-Guadalupe, and the Santa Ynez and Lompoc Valleys. Impacts from individual projects will need to be addressed on a case-by-case basis; however, because impacts to individual



agricultural properties cannot be assumed to be insignificant, agricultural impacts are considered potentially significant and unavoidable.

#### Response S.4-5

Executive Summary page ES-2 has been revised to include the following text:

**“Agencies and personnel consulted pursuant to SAFETEA-LU included the Santa Barbara Air Pollution Control District; California Department of Fish & Game; the California Environmental Protection Agency; Michelle Messinger with the California Office of Historic Preservation (July 10, 2008); the Santa Barbara Agricultural Commissioner’s Office; the Santa Barbara County Planning and Development Department; Santa Barbara County Resource Management Department; the United States Department of Agriculture; and the United States Environmental Protection Agency.”**

Refer also to Response S.4-2 for a discussion of the programmatic level of detail of this EIR.

It should be noted that the Environmental Mitigation Strategy included in the RTP recommends consultation with local conservation organizations, such as the Conception Coast Project.

#### Response S.4-6

Since funding sources and quantities would not result in physical environmental impacts, and because funding sources and quantities are likely to be modified over time, Tables 2-1 through 2-6 in Section 2.0, *Project Description*, have been revised as follows:

Delete the fourth column “Programming/Planning Document or Funding Source”.

#### Response S.4-7

The RTP Update EIR is a Program level evaluation rather than a design-level project evaluation. As described in Section 15146 of the CEQA Guidelines, “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” The EIR provides a broad reasonable worst-case evaluation of the impacts of the RTP as a whole. Project-level review of individual RTP transportation projects may refine this conclusion based on specific design details.

#### Response S.4-8

Refer to Response S.4-7.

#### Response S.4-9

Section 2.0, *Project Description*, page 2-22, second full paragraph, has been revised as follows:

“Tables 2-1 and 2-2 list new program and plan roadway and bikeway improvements proposed in the 2008 RTP Update. The locations of new program or plan road and bikeway improvements are shown on Figures 2-2 through 2-9. The public works department of each jurisdiction proposed



projects for the state highway or local roadway system within its jurisdiction. These projects address current and future roadway needs based on existing traffic conditions and projected traffic increases anticipated based on the growth accommodated in the jurisdiction's land use plans. In compiling this list, projects within each jurisdiction (the state, the county, and the cities) were prioritized by order of importance **or year of construction** based on the jurisdiction's input.”

Response S.4-10

Although an update to intersection level of service data is likely to show increased volume-to-capacity ratios for most CMP intersections, the provision of such data would not change the conclusion of the EIR that the RTP programmed and planned projects would provide a measurable benefit to deficient intersections in the North County, particularly in the Santa Maria Valley. In addition, as described in Section 4.1, *Transportation and Circulation*, of the Draft EIR, none of the CMP intersection impacts would be caused directly by the RTP projects themselves. They are, instead, the result of projected traffic growth that is independent of the RTP projects. They are, therefore, not significant impacts of the RTP in the traditional sense. They are significant impacts only in the sense that one of the RTP goals is to maintain LOS D or better on roadways in the county, and the RTP does not fully meet that goal at these locations. Because these locations are on the region’s CMP system, at the time the intersections and roadway segments listed above reach unacceptable levels of service based upon CMP standards, the responsible agency must develop and adopt a deficiency plan within nine months which either identifies physical improvements to the roadway or identifies some combination of other measures which would improve the level of service to at least LOS D. Therefore, although the proposed RTP does not provide specific improvements for these locations at this time, a mechanism is in place (CMP monitoring) which would alleviate these impacts through future RTP updates.

Response S.4-11

Section 4.1, *Transportation and Circulation*, has been revised as follows:

**Table 4.1-6  
 Year 2030 P.M. Peak Hour LOS on U.S. 101 Northbound  
 Between Goleta and Santa Maria**

Segment	Distance (miles)	2030 No-Build LOS	2030 Programmed LOS	2030 Planned LOS
Hollister Ave.- Las Cuces/Rte. 1	21.9	E	E-F	E
<b>Clark Ave – Santa Maria Way</b>	<b>2.2</b>	<b>D</b>	<b>E</b>	<b>E</b>



Response S.4-12

Section 4.4, *Noise*, page 4.4-4, 5<sup>th</sup> full paragraph, has been revised as follows:

“AMTRAK provides intercity passenger rail service through the county. **According to the LOSSAN North Strategic Plan (December 2007), ten** ~~Twelve~~ trains per day operate between **Los Angeles and Santa Barbara Oxnard and Goleta**, while **four** ~~ten~~ trains per day operate between Santa Barbara ~~Goleta~~ and San Luis Obispo. ~~These totals include the intercity Coast Starlight, which operates once daily in each direction (Amtrak Train Schedule, October 2007).~~”



# DEPARTMENT OF CONSERVATION

## DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0860 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEBSITE [conservation.ca.gov](http://conservation.ca.gov)

September 2, 2008

### VIA FACSIMILE (805) 961-8901

Mr. Michael Powers  
 Santa Barbara County Association of Governments  
 260 N. San Antonio Road, Suite B  
 Santa Barbara, CA 93110

Dear Mr. Powers:

Subject: 2008 Santa Barbara County Regional Transportation Plan Draft Environmental Impact Report  
 SCH# 2004081136

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) for the referenced project. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the project's impacts on agricultural land and resources.

### Project Description

This document is a Programmatic EIR for implementation of the 2008 Regional Transportation Plan (RTP) proposed by the Santa Barbara County Association of Governments (SBCAG). The analysis of environmental impacts identifies impacts by category: significant and unavoidable (Class I), significant but mitigable (Class II), adverse but less than significant (Class III), and beneficial (Class IV). It proposes mitigation measures, where feasible, for identified significant environmental impacts.

The Notice of Completion and Environmental Document Transmittal form indicates that project issues discussed in the document include Agricultural Land. The issue of agricultural land, however, is included only as part of Land Use as an issue. The document therein states: "Some RTP projects could convert agricultural lands to transportation infrastructure. Although the actual level of impact from individual projects is not known at this time, the overall impact to agriculture is assumed to be Class I, *significant and unavoidable*." (Impact LU-4)

The DEIR provides an insufficient level of detail on potential negative impacts to agricultural lands to determine the extent or specific nature of potential impacts on farmland or Williamson Act contracts.

Therefore, the Division recommends that the EIR address the following items to provide a comprehensive discussion of potential impacts of the project on agricultural land and activities.

S.5-1

Mr. Michael Powers  
September 2, 2008  
Page 2 of 4

### Agricultural Setting of the Project

- Location and extent of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and other types of farmland in and adjacent to the project area.
- Current and past agricultural use of the project area. Please include data on the types of crops grown and crop yields and farm gate sales values.

To help describe the full agricultural resource value of the soils on the site, the Department recommends the use of economic multipliers to assess the total contribution of the site's potential or actual agricultural production to the local, regional and state economies. Two sources of economic multipliers can be found at the University of California Cooperative Extension Service and the United States Department of Agriculture (USDA).

### Project Impacts on Agricultural Land

- Type, amount, and location of farmland conversion resulting directly and indirectly from project implementation and growth inducement, respectively.
- Impacts on current and future agricultural operations; e.g., land-use conflicts, increases in land values and taxes, vandalism, etc.
- Incremental project impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely projects in the future.
- Under California Code of Regulations §15064.7, impacts on agricultural resources may also be both quantified and qualified by use of established thresholds of significance. As such, the Division has developed a California version of the USDA Land Evaluation and Site Assessment (LESA) Model. The California LESA model is a semi-quantitative rating system for establishing the environmental significance of project-specific impacts on farmland. The model may also be used to rate the relative value of alternative project sites. The LESA Model is available on the Division's website at:

[http://www.consrv.ca.gov/DLRP/qh\\_lesa.htm](http://www.consrv.ca.gov/DLRP/qh_lesa.htm)

### Mitigation Measures

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department recommends the use of agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If a Williamson Act contract is terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with California Environmental Quality Act (CEQA) Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

S.5-1

Mr. Michael Powers  
September 2, 2008  
Page 3 of 4

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands should be conducted regionally or statewide, and not limited strictly to lands within the project's surrounding area.

Other forms of mitigation may be appropriate for this project, including:

- Directing a mitigation fee to invest in supporting the commercial viability of the remaining agricultural land in the project area, County or region through a mitigation bank that invests in agricultural infrastructure, water supplies, marketing, etc.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number below. General information about agricultural conservation easements, the Williamson Act, and provisions noted above is available on the Department's website. The Division's website address is:

<http://www.conservation.ca.gov/dlrp/index.htm>

Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

#### Williamson Act Lands

Under California Code of Regulations §15206(b)(3), a project is deemed to be of statewide, regional or area-wide significance if it will result in cancellation of a Williamson Act contract for a parcel of 100 or more acres. Since lands under Williamson Act contracts and/or in agricultural preserves exist in the project area, the Department recommends that the following information be discussed and/or provided in the EIR:

- A map detailing the location of agricultural preserves and contracted land within each preserve. The EIR should also tabulate the number of Williamson Act acres, according to land type (e.g., prime or non-prime agricultural land), which could be impacted directly or indirectly by the project.
- A discussion of Williamson Act contracts that may be terminated in order to implement the project. The EIR should discuss the probable impacts on nearby properties resulting from the termination of adjacent Williamson Act contracts. For example, a termination of a Williamson Act contract may have a growth-inducing impact. In other words, a termination may not only lift a barrier to development, but also result in higher property taxes, and thus, an incentive to shift to a more intensive land use, such as urban development.

S.5-1

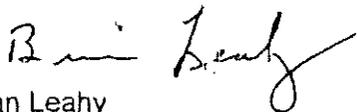
Mr. Michael Powers  
September 2, 2008  
Page 4 of 4

- As a general rule, land can only be withdrawn from a Williamson Act contract through the nine-year non-renewal process. Immediate termination via cancellation is reserved for "extraordinary circumstances" (See Sierra Club v. City of Hayward (1981) 28 Cal.3d 840, 852-855). Under Government Code §51282, the city or county must approve a request for cancellation and base that approval on specific findings that are supported by substantial evidence. When cancellation is proposed, the Department recommends that a discussion of the findings be included in the EIR. Finally, a notice of the hearing to approve the tentative cancellation and a copy of the landowner's petition must be mailed to the Director of the Department ten working days prior to the hearing. (The notice should be mailed to Bridgett Luther, Director, Department of Conservation, c/o Division of Land Resource Protection, 801 K Street MS 18-01, Sacramento, CA 95814-3528.)
- If portions of the planning area are under Williamson Act contracts (and will continue to be under contract after project implementation) the EIR should discuss the proposed uses for those lands. Uses of contracted land must meet compatibility standards identified in Government Code §§51238 - 51238.3. Otherwise, contract termination (see paragraph above) must occur prior to the initiation of the land use.
- An agricultural preserve is a zone authorized by the Williamson Act and established by the local government to designate qualified land to be placed under the Williamson Act's 10-year contracts. Preserves are also intended to create a setting for contract-protected lands that is conducive to continuing agricultural use. Under Government Code §51230, "An agricultural preserve may contain land other than agricultural land, but the use of any land within the preserve and not under contract shall within two years of the effective date of any contract on land within the preserve be restricted by zoning, including appropriate minimum parcel sizes that are at a minimum consistent with this chapter, in such a way as not to be incompatible with the agricultural use of the land." Therefore, the EIR should also discuss any proposed general plan designation or zoning within agricultural preserves affected by the project.

S.5-1

Thank you for giving us the opportunity to comment on this DEIR. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Bruce Gwynne, Staff Environmental Scientist, at 801 K Street, MS 18-01, Sacramento, California 95814; or, phone (916) 323-4943.

Sincerely,



Brian Leahy  
Assistant Director

cc: State Clearinghouse

*Letter S.5*

**COMMENTER:** Brian Leahy, Assistant Director, State of California Resources Agency,  
Department of Conservation, Division of Land Resources Protection

**DATE:** September 2, 2008

Response S.5-1

The commenter requests additional detail on potential negative impacts to agricultural lands to determine the extent or specific nature of potential impacts on farmland or Williamson Act contracts.

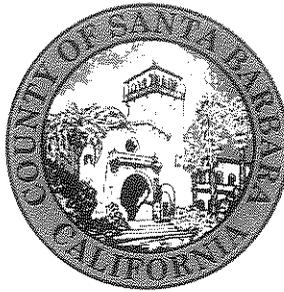
The RTP Update EIR is a Program level evaluation rather than a design-level project evaluation. As described in Section 15146 of the CEQA Guidelines, "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." The EIR provides a broad reasonable worst-case evaluation of the impacts of the RTP as a whole. The EIR identifies numerous transportation projects that have the potential to impact agricultural lands. However, it is unfeasible to quantify the acreage or level of impact for these projects at this level of analysis due to the programmatic nature of the RTP. Project-level review of individual RTP transportation projects may refine this conclusion based on specific design details.

It should be noted that the agricultural resources maps requested by the commenter for inclusion in the EIR have been included in the RTP.

Section 4.2, *Land Use*, Mitigation Measures, on page 4.2-7 of the Draft EIR, has been revised to include the following additional mitigation measure:

- "LU-4(c) When new roadway extensions are planned in areas that contain sensitive farmland, the local jurisdiction in which the RTP project is located shall assure that project-specific environmental reviews consider the use of agricultural conservation easements on land of at least equal quality and size as compensation for the loss of agricultural land. Agricultural conservation easements could be implemented by directly purchasing easements or donating mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements."**

COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT  
123 East Anapamu Street  
Santa Barbara, CA 93101  
(805) 568-3000 FAX (805) 568-3019



SCOTT D. MCGOLPIN  
Director

RECEIVED

AUG 04 2008

Santa Barbara County  
Association of Governments

July 30, 2008

Jim Kemp  
Association of Governments  
Executive Director  
260 N. San Antonio Road, Suite B  
Santa Barbara, CA 93110

Re: SR 192 Widening Project Inclusion in RTP

Dear Jim,

The purpose of this letter is to request that SBCAG include a project to widen SR192 through the Montecito area on the "Illustrative" list of projects in the RTP. The County is making this request; however, we do not own or maintain this roadway. In the future, when this project begins the project development stage, the County will be a partner with Caltrans, but will not assume any of the maintenance liability or responsibility for this roadway.

The proposed limits of the widening project would extend from SR144 to San Ysidro Road. It is proposed that the project would widen SR192 to provide shoulders to increase safety for pedestrians and bicyclists traversing this transportation facility. The exact cost of the project is unknown at this time; however, the County would estimate that the improvements would be approximately \$75 million.

We would appreciate SBCAG adding this safety improvement project to the illustrative list of projects included in the updated RTP. Please do not hesitate to contact me at 805-568-3010 if you have any questions regarding this request.

Sincerely,

Scott D. McGolpin, Director, Public Works Department

Cc: Salud Carbajal, First District Supervisor  
Mike Brown, County CEO  
John Baker, Deputy County CEO  
Dacé Morgan, Deputy Director -- Transportation Division

AA/EEO Employer

C.1-1

*Letter C.1*

**COMMENTER:** Scott D. McGolpin, Director, County of Santa Barbara Public Works  
Department

**DATE:** July 30, 2008

Response C.1-1

The commenter requests that SBCAG include a project to widen SR-192 on the “illustrative” list of projects in the RTP. In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.





**Santa Barbara County  
Air Pollution Control District**

**Letter R.1**

RECEIVED

September 2, 2008

SEP 02 2008

Michael Powers  
Santa Barbara County Association of Governments  
260 N. San Antonio Road Suite B  
Santa Barbara, CA 93110

Santa Barbara County  
Association of Governments

Re: **APCD Review of Draft 2008 Regional Transportation Plan and Associated Draft Program  
Environmental Impact Report**

Dear Mr. Powers:

APCD Staff appreciates the opportunity to review and comment on the Draft 2008 Regional Transportation Plan (RTP) and associated Draft Program Environmental Impact Report (DEIR). We offer the following comments related to air quality:

**Draft 2008 Regional Transportation Plan (RTP):**

- 1. **Page 2-13, Section 2.2.6, Climate Change:** Under the *“Contributions from Mobile Sources”* Section, there is a reference to a report (CEC, 2005). The author of the report should be identified (California Energy Commission? Community Environmental Council?) and the full title of the document should be included in a footnote or references section.

R.1-1

**Draft Program Environmental Impact Report for 2008 RTP (DEIR):**

- 1. **Page ES-7, Table ES-1, Summary of Environmental Impacts:** Under *“Impact”* in the first column of this table, impact AQ-1 is presented as *“Class II, Significant but Mitigable.”* In the third column, it is presented as *“Class III, Less than significant.”* APCD staff agrees with the first column, that this impact is Class II, significant but mitigable. The text in Section 4.3 supports classifying construction impacts as Class II as well.

R.1-2

In addition, the mitigations for impact AQ-1 should be updated with the latest version of APCD-recommended mitigations for construction impacts, included in this letter as Attachment A (Fugitive Dust Control Measures) and Attachment B (Diesel Particulate and NO<sub>x</sub> emission Mitigations).

- 2. **Page 4.3-2, Section 4.3.1.b., Air Quality Setting, Pollutants:** This section should include a discussion of greenhouse gases and toxic air pollutants, including diesel particulate matter. In addition, Section 4.3.1.c., Local Regulatory Framework, should include regulatory information regarding these pollutant types.

R.1-3

3. **Page 4.3-5, Figure 4.3-1:** The title of this figure should be "*Santa Barbara County Annual Average PM<sub>10</sub> Source Apportionments*" (not *Appointments*).

R.1-4

4. **Page 4.3-6, Section 4.3.2.d., Air Quality Setting, Current Air Quality:** The first paragraph of this section contains a reference to Figure 4.3-4; however, the document does not include a Figure 4.3-4 in the text or in the Table of Contents.

R.1-5

Also, the second paragraph, first sentence, begins with "*The Santa Barbara County air quality management agency...*" Consistent with other text in this section, this should read "*The Santa Barbara County APCD...*"

5. **Page 4.3-8, Section 4.3.2.a., Air Quality Impact Analysis, Methodology and Significance Thresholds:** APCD updated its *Scope and Content of Air Quality Sections in Environmental Documents* in June, 2008. The current version of this document is available for download at [www.sbcapcd.org](http://www.sbcapcd.org) (Land Use & CEQA link). The updated version includes a discussion of greenhouse gases (section 4.4), as well as current recommended mitigation measures for construction activities.

R.1-6

In addition, this section of the DEIR presents significance thresholds from the APCD as well as from the County of Santa Barbara. The County of Santa Barbara thresholds presented here are an incomplete listing (reference pages 26 to 32 of County of Santa Barbara Environmental Thresholds and Guidelines Manual, available from [www.sbcountyplanning.org](http://www.sbcountyplanning.org)). It is unclear which of the thresholds being provided in the document are applicable to the Program EIR. For example, in the second paragraph on Page 4.3-9, it is stated that "*...because the RTP itself does not directly generate the emissions, County thresholds associated with 'new' or Indirect Source Review do not apply in this case.*" This section should be revised so that it clearly presents the significance thresholds that are being used in the Program EIR. In order to improve clarity of the document, those thresholds that are not being used should either be removed or clearly presented as such.

6. **Page 4.3-9, Section 4.3.2.a., Air Quality Impact Analysis, Methodology and Significance Thresholds:** Under "*Short-Term Emissions Methodology*" at the top of Page 4.3-9, there is a statement that "*In any event, construction-related emissions are not relevant at the RTP level because such emissions are dependent on the characteristics of individual development projects.*" APCD staff does not agree with this statement, and the statement conflicts with other sections in the document that discuss construction-related impacts and offer mitigations.

R.1-7

The last sentence in this paragraph states that "*...because the region does not meet the federal or State standards for ozone or the State standard for PM<sub>10</sub>, the County requires implementation of standard emission and dust techniques for all construction.*" This sentence needs to be

updated. Santa Barbara County is considered in attainment of the federal eight-hour ozone standard, and in attainment of the state one-hour ozone standard. We do not meet the state eight-hour ozone standard or the state standard for particulate matter less than ten microns in diameter (PM<sub>10</sub>); we do meet the federal PM<sub>10</sub> standard. There is not yet enough data to determine our attainment status for either the federal standard for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) or the state PM<sub>2.5</sub> standard, although we will likely be in attainment for the federal PM<sub>2.5</sub> standard.

R.1-7

It should also be noted that APCD also recommends mitigation measures for the control of diesel particulates from construction equipment exhaust because it is considered a carcinogen and a toxic air contaminant.

7. **Page 4.3-10, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures:** The first paragraph on this page discusses construction-related impacts, and mentions the use of asphalt or other oil-based substances during the final construction phases. It should be noted that these activities are subject to APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials* (available online at [www.sbcapcd.org](http://www.sbcapcd.org), Rules & Regulations link).

R.1-8

8. **Page 4.3-10, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures:** Mitigation measures AQ-1(a), (b), (c), and (d) should be revised to reflect current APCD –recommended mitigation measures for construction activities. Please refer to APCD’s June 2008 *Scope and Content of Air Quality Sections in Environmental Documents* or to Attachments (A) and (B) to this letter.

R.1-9

Mitigation measure AQ-1(e) refers an off-site mitigation program for construction projects. APCD does not currently have a formal off-site mitigation program. Currently, APCD recommends mitigating construction-related impacts to the maximum extent feasible through on-site mitigation measures.

9. **Page 4.3-11, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures:** Impact AQ-2 states that “...Although implementation of the 2008 RTP would increase PM<sub>10</sub> emissions as compared to implementation of the no project scenario, the increase would not exceed threshold levels.” It is not clear what PM<sub>10</sub> threshold level, be it quantitative or qualitative, is being used for this analysis. Please clarify.

R.1-10

10. **Page 4.3-12 and 13, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures:** The discussion of this approach to analyzing air quality impacts for Impact AQ-2 is confusing, for several reasons:

R.1-11

- a. In Table 4.3-3, “*Threshold of Significance Results (Roadway and Transit Improvements)*,” emissions are quantified in terms of tons per day, and NO<sub>x</sub> and ROC emissions are kept

separate. In Table 4.3-4, "Annual Regional Emissions Analysis (Roadway and Transit Improvements)," emissions are quantified in terms of tons per year using a weighting factor for summer/winter emissions. ROC and NO<sub>x</sub> emissions are then combined, presumably for comparison purposes. What numerical significance thresholds are these emissions calculations being compared with? The text and tables should clearly show this. When there are no quantitative thresholds presented, it is difficult to understand why the daily results from EMFAC were weighted to determine annual emissions, or why the ROC and NO<sub>x</sub> emissions were combined.

- b. The last paragraph on Page 4.3-12 states that, "As shown in Table 4.3-3, implementation of the 2008 RTP does not violate the ozone impact Threshold of Significance." The text should clearly indicate which quantitative threshold this refers to.
- c. The discussion on Page 4.3-13, first paragraph, asserts that increased PM<sub>10</sub> emissions are less than significant based on a 10% increase between 2002 baseline and 2008 RTP-Planned Scenario. Is this assertion based on a numerical significance threshold presented in the document? If so, the document should indicate.
- d. The discussion on Page 4.3-13, first paragraph, also compares 2008 RTP emissions forecasts with 2020 forecasts documented in the 2007 CAP. This statement should be supported with data from the 2007 CAP. One suggestion is to include this information as another row on Table 4.3-4.
- e. The third paragraph on Page 4.3-13 compares the "Programmed" scenario to the "No Build" scenario. Elsewhere in the document, the "no build" scenario is called the "no project" scenario. The wording should be changed to "no project" here, for consistency.

R.1-11

11. **Page 4.3-14, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures** : The discussion for Impact AQ-3, regarding emissions of particulate diesel from motor vehicles, should include information regarding the health risks associated with exposing sensitive receptors (such as children and elderly people) to diesel particulate emissions near transportation corridors such as Highway 101 and the Union Pacific Railroad corridor. Additional information regarding this issue can be found on ARB's website at <http://www.arb.ca.gov/ch/landuse.htm>.

R.1-12

12. **Page 4.3-16, Section 4.3.2.b., Air Quality Impact Analysis, Project Impacts and Mitigation Measures** : The discussion for Impact AQ-5 includes an analysis of the proposed project's consistency with the APCD's 2007 Clean Air Plan for Santa Barbara County. APCD's *Scope and Content of Air Quality Sections in Environmental Documents* recommends that a consistency analysis be used to determine whether the project has cumulative impacts. Therefore, Impact AQ-5 would be more appropriately included in the discussion of cumulative impacts.

R.1-13

13. **Page 4.3-21, Section 4.3.2.c., Air Quality Impact Analysis, Cumulative impacts:** The second and third sentences in the last paragraph on Page 4.3-21 state that, *“On a cumulative level, construction emissions could emit large amounts of pollutants. However, because Santa Barbara County does not have construction thresholds because of the temporary condition, impacts would not be significant.”* The last sentence on this page states that *“Cumulative impacts related to implementation of the 2008 RTP would be Class II, Less than Significant.”*

R.1-14

These statements conflict with other sections of the impact analysis that present construction impacts as Class II, significant but mitigable. See comment numbers 1 and 6 of this letter. APCD staff agrees with the findings for Air Quality Impact AQ-1, and suggests mitigations as described in Attachments A and B of this letter. Please revise this section accordingly.

14. **Page 4.3-22, Section 4.3.2.d., Air Quality Impact Analysis, Greenhouse Gas Emissions:** APCD’s *Scope and Content* document recommends that environmental documents include a discussion of greenhouse gases (GHG’s). As mentioned in comment number 2 of this letter, some of this discussion should be moved to Sections 4.3.1.b. and 4.3.1.c. of the DEIR.

The first paragraph on Page 4.3-23 (below the bullet items) asserts that *“...CO2 emissions generated from regional transportation projects in Santa Barbara County will not lead to any significant worldwide increase in global temperatures.”* In addition, the second-to-last paragraph on Page 4.3-23 states that *“...the proposed 2008 RTP would not directly result in impacts that would increase GHG emissions to Santa Barbara County.”*

R.1-15

APCD acknowledges that global climate change impacts are cumulative in nature, and that projects contribute to global climate change through incremental increases in GHG emissions. Because this section is a discussion of cumulative (as opposed to direct, project-specific) emissions, APCD staff recommends changing the wording of this discussion to acknowledge the proposed project’s incremental contribution to GHG emissions and thus global climate change impacts.

APCD staff also agrees with the assertion that individual projects subject to CEQA contained in the RTP should be analyzed individually and would require a separate GHG emissions analysis. Section 4.4 of APCD’s *Scope and Content* document strongly recommends the implementation of all feasible mitigation measures to reduce the emissions of GHG’s.

15. **Appendix C, Air Quality Report:** The document in the appendix appears to be a more detailed version of the air quality impact analysis that is presented in the text of the EIR. Most of the information included in Appendix C is redundant of the information provided in the text of the document. However, in some instances the text reads differently. The inclusion of this additional text presents confusion to the reader and does not appear necessary. There are

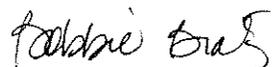
R.1-16

some valuable reports, such as the EMFAC output files, that are appropriate for the Air Quality Appendix. The appendix should be revised to include only non-redundant information that supports the impact analysis that is presented in Section 4.3 of the document.

R.1-16

If you have any questions regarding the above comments, please feel free to contact Molly Pearson at 961-8838 ([mmp@sbcapcd.org](mailto:mmp@sbcapcd.org)), Vijaya Jammalamadaka at 961-8893 ([vji@sbcapcd.org](mailto:vji@sbcapcd.org)) or myself at 961-8890 ([bratzb@sbcapcd.org](mailto:bratzb@sbcapcd.org)).

Sincerely,



Bobbie Bratz

Public Information and Community Programs Supervisor  
Technology and Environmental Review Division

cc: TEA Chron File  
Project File (SBCAG 2008 Regional Transportation Plan)  
Vijaya Jammalamadaka, SBCAPCD  
Molly Pearson, SBCAPCD



**ATTACHMENT A**  
**FUGITIVE DUST CONTROL MEASURES**

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

**Plan Requirements:** All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

**MONITORING:** Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

**ATTACHMENT B**  
**DIESEL PARTICULATE AND NO<sub>x</sub> EMISSION MITIGATIONS**  
**JUNE 30, 2008**

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. Therefore, following is an updated list of control strategies that should be implemented to the maximum extent feasible.

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit by September 18, 2008.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- As of June 15, 2008, fleet owners are subject to sections 2449, 2449.1, 2449.2, and 2449.3 in Title 13, Article 4.8, Chapter 9, of the California Code of Regulations (CCR) to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use off-road diesel-fueled vehicles. See <http://www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf>.
- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Other diesel construction equipment, which does not meet CARB standards, shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines. Diesel catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.  
State law requires that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds:
  - shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location
  - shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if you have a sleeper berth and you're within 100 feet of a restricted area (homes and schools).

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

**Plan Requirements:** Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

**MONITORING:** Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

*Letter R.1*

**COMMENTER:** Bobbie Bratz, Public Information and Community Programs Supervisor, Santa Barbara County Air Pollution Control District, Technology and Environmental Review Division

**DATE:** September 2, 2008

Response R.1-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

Response R.1-2

Executive Summary, Table ES-1, on page ES-7 of the Draft EIR, has been revised for the Impact AQ-1 row as follows:

The third column has been revised to indicate the severity of the impact (Class II, significant but mitigable) without the mitigation measures.

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment.

Response R.1-3

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The EIR has been updated to include discussion of toxic air pollutants, diesel particulate matter, and greenhouse gas emissions within sections 4.3.1.b and 4.3.1.c.

Response R.1-4

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The title of the figure has been changed as requested.

Response R.1-5

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The reference to Figure 4.3-4 has been deleted. The sentence has been changed to read as “the Santa Barbara County APCD”.



Response R.1-6

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment.

There are two thresholds that were used to determine the significance of air quality impacts. The section has been revised to clearly indicate the following significance thresholds:

- **The Plan will have a significant air quality impact on the environment if implementation of the Plan will result in the emission of more than 25 lbs./day or 4.56 tons/year of NO<sub>x</sub> or ROC from motor vehicle trips only.**
- **The Plan's long term impacts to air quality will be considered significant if the project results in mobile source emissions that exceed existing levels. In this case, the pollutants of concern are ozone precursors (NO<sub>x</sub> and ROC) and fine particulate matter.**

Response R.1-7

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The referenced sentence has been deleted. The EIR has been revised to indicate non-attainment for the state 8-hour ozone standard and state PM<sub>10</sub> standard. The EIR has also been updated to indicate APCD's recommendation regarding control of diesel particulates from construction.

Response R.1-8

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The EIR has been updated to reference APCD Rule 329.

Response R.1-9

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The EIR has been revised to include APCD's recommendations for mitigation measures AQ-1 (a), (b), (c), and (d). APCD's recommended mitigation measures have been included in the EIR for reference. Mitigation measure AQ-1(e) has been deleted.

Response R.1-10

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. Impact AQ-2 has been revised as follows:

**Impact AQ-2 Implementation of the 2008 RTP would reduce emissions of ozone precursors as compared to implementation of the no project scenario. Although implementation of the 2008 RTP would increase PM<sub>10</sub> emissions as compared to implementation of the no project scenario to**



~~existing levels, the increase would not exceed threshold levels emissions would be less than the no project scenario. With implementation of planned Santa Barbara County control measures, Therefore, long-term operational impacts would be Class III, Less than Significant.~~

Response R.1-11

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment.

- a. There are two significance thresholds to which each of these tables (refer to Response R.1-6). Table 4.3-3 applies to the first threshold and Table 4.3-4 applies to the second. The tables have been revised to identify the quantitative thresholds.
- b. Comment noted. Tables have been revised for clarity.
- c. The referenced sentence has been changed to clarify Impact AQ-2.
- d. The referenced table has been revised to show the 2020 emissions from the Clean Air Plan.
- e. References to “No build” have been changed to “no project” in the Air Quality section of the EIR.

Response R.1-12

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The EIR has been revised to clarify health risk impacts from emissions of particulate diesel.

Response R.1-13

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. Impact AQ-5 has been moved to the “cumulative impacts” section.

Response R.1-14

As noted in the EIR, contribution of emissions from construction will occur as RTP projects are developed, which could be considered a cumulative impact. However, with implementation of Mitigation Measures AQ-1a through e and implementation of transit and TDM projects, this impact would be considered less than significant.

Response R.1-15

Refer to Section 2.0, *Revisions to the Draft EIR* in this document for the updated Section 4.3, *Air Quality* which reflects the changes related to this comment. The “setting” discussion in the

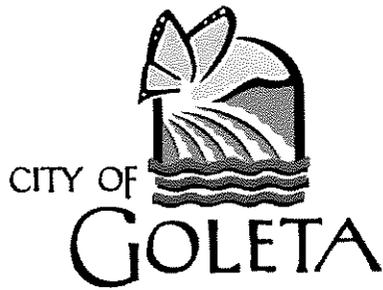


greenhouse gases section has been moved to the “environmental setting” section. The language in the EIR has been revised to more clearly indicate the severity of global climate change and its relationship to conditions in Santa Barbara County. However, the RTP (“project”), by itself, does not incrementally contribute to GHG emission increases. As shown in Table 4.3-10, full implementation of the RTP projects shows less CO2 emissions than the “no project” scenario. The EIR acknowledges that some projects, taken individually, will contribute to cumulative GHG impacts and that these projects will be subject to their own individual GHG emissions analysis during the project’s environmental review phase.

Response R.1-16

The SBCAG staff analysis has been removed from the appendix. The appendix has been revised to contain the EMFAC output sheets and recommended mitigation measures provided by APCD staff.





AUG 28 2008

Santa Barbara County  
Association of Governments

August 27, 2008

**CITY COUNCIL**  
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*Mayor Pro Tempore*

Jean W. Blois  
*Councilmember*

Eric Onnen  
*Councilmember*

Jonny Wallis  
*Councilmember*

**CITY MANAGER**  
Daniel Singer

Michael Powers  
SBCAG  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

**RE: SBCAG Regional Transportation Plan draft EIR comments**

Dear Mr. Powers:

Thank you for the opportunity to comment on the draft EIR for the 2008 Regional Transportation Plan (RTP). The City's comment relates to the absence of a cumulative transportation impact analysis.

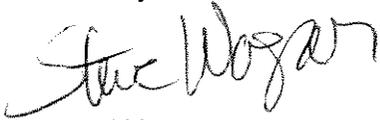
Several major Highway 101 projects are expected to occur between the City of Santa Barbara and La Conchita within the next couple of decades. These projects include the Cabrillo/Hot Springs - Milpas Hwy 101 Operational Improvement Project, Casitas Pass and Linden Avenue Hwy 101 Interchange Projects in Carpinteria, CSMP Hwy 101 widening project between Carpinteria and La Conchita, and, when funded, widening of Hwy 101 between Carpinteria and Montecito. These along with any other projects along the local highway corridor will likely cause significant travel delays for commuters on a consistent long term basis. Eventually, this could cause a significant commute shift from Santa Barbara south to Santa Barbara north as a result of commuters avoiding the heightened level of congestion from the ongoing construction. This significant increase in Hwy 101 congestion to and from the north could significantly impact the level of service of the four lane section of Hwy 101 within the City of Goleta that extends between the Fairview Avenue and Storke Road Interchanges.

The City of Goleta requests that this potential commute shift issue be discussed in the final EIR including reference to how it could affect the four lane section in Goleta which is identified as a "planned" project for widening to six lanes in the RTP as well as identified in the City's Goleta Transportation Improvement Plan.

L.1-1

Thank you again for the opportunity to comment. I can be reached at (805) 961-7500 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Steve Wagner". The signature is written in a cursive, flowing style.

Steve Wagner  
Community Services Director

*Letter L.1*

**COMMENTER:** Steve Wagner, Community Services Director, City of Goleta

**DATE:** August 27, 2008

Response L.1-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.



Metropolitan Transit District  
550 Olive Street  
Santa Barbara, CA 93101

p (805) 963-3364  
f (805) 962-4794  
www.sbmtd.gov

## Letter L.2

August 27, 2008

Mr. Jim Kemp  
Executive Director  
Santa Barbara County Association of Governments  
260 N. San Antonio Road, Suite B  
Santa Barbara, CA 93110

Re: Vision 2030: 2008 Regional Transportation Plan (Draft)

Dear Mr. Kemp:

The Santa Barbara Metropolitan Transit District (MTD) appreciates the opportunity to comment on the Draft "Vision 2030: 2008 Regional Transportation Plan" (RTP). Preparation of an RTP is a daunting task, and your staff is to be commended for their work.

However, the Draft RTP reflects a "business as usual" allocation of financial resources for single-occupant vehicle infrastructure compared to the allocation for transit and other alternative modes of travel. MTD's Board of Directors believes it would be prudent to analyze the effect on transportation needs in Santa Barbara County if, as seems likely, continued increases in the cost of fossil fuel results in a dramatic mode shift away from the single-occupant vehicle and toward transit and other alternative modes. If such a substantial shift did occur, highway construction projects currently programmed or planned in the Draft RTP may no longer be needed, due to the decrease in single-occupant vehicle trips.

The effect of such a mode shift on MTD and other transit operators would be dramatic. The funds allocated to transit in the Draft RTP would be far from sufficient to provide the increased service that would be necessary to meet a substantial increase in demand. Enhancing MTD service to a level sufficient to meet the needs under such a mode-shift scenario could easily double or triple the annual operating cost of the service. Thus, if such a mode shift were to occur, it may be desirable to shift resources from highway construction projects (that would no longer be needed, as discussed above) to transit service.

An analysis of the potential effects of such a mode shift could be incorporated into the RTP as an alternative scenario, so that the county is prepared if major changes do occur. MTD understands that such an analysis would be a major

L.2-1

undertaking, and does not wish to stand in the way of adoption of the RTP. Thus, MTD requests that, following adoption of the RTP, SBCAG begin preparation of an addendum to the RTP to address this concern, with the addendum to be completed within the year following adoption of the RTP.

L.2-1

Sincerely,



Sherrie Fisher  
General Manager

C: MTD Board of Directors  
Michael Powers, SBCAG (Electronic Copy)  
Aubrey Spilde, SBCAG (Electronic Copy)

*Letter L.2*

**COMMENTER:** Sherrie Fisher, General Manager, Santa Barbara Metropolitan Transit District

**DATE:** August 27, 2008

Response L.2-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.



## Letter L.3-1

**From:** Matt Roberts [mattr@ci.carpinteria.ca.us]  
**Sent:** Tuesday, September 02, 2008 3:04 PM  
**To:** Aubrey J. Spilde  
**Subject:** RE:  
**Attachments:** sbcag 2030.xls

Hi Aubrey,

I have reviewed the list in appendix D and recommend the following additions and amendments. I have attempted to describe these changes on the attached spreadsheet. I did not assign actual project numbers or funding sources as I don't know what different projects are eligible for. I also was not sure what action year means. Please call to discuss. New projects are listed as item# a-d.

Project c-1 : This used to be a project to route from Santa Claus lane to Carpinteria Avenue, and after the city has worked on it for a while, we now believe it should go back to the original route. Therefore C -1 should be a class one bike path from Santa Claus lane to Carpinteria Avenue.

Project c-2 : we have asked for the CTC to allocate construction funds. This project is bid ready. We expect to construct this fall, winter provided we get CTC funds allocated

Project C PL 2: Delete this one.

Project C PL 7. Same project, see new text on attached spreadsheet

C PL 8: see new text on attached spreadsheet

See new projects (a-d)

L.3-1

Matthew Roberts  
Director, Parks and Recreation  
City of Carpinteria  
5775 Carpinteria Avenue  
Carpinteria, CA 93013  
(805) 684-5405 x449  
Fax(805) 684-5304  
e-mail: [mattr@ci.carpinteria.ca.us](mailto:mattr@ci.carpinteria.ca.us)

*Letter L.3*

**COMMENTER:** Matt Roberts, Director, Parks and Recreation, City of Carpinteria

**DATE:** September 2, 2008

Response L.3-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.



## Letter F.1

**From:** Sam Cohen [mailto:scohen@santaynezchumash.org]  
**Sent:** Friday, August 15, 2008 11:00 AM  
**To:** Michael G. Powers  
**Cc:** Sam Cohen  
**Subject:** Comments to 2008 Draft RTP

The 2008 Draft RTP refers to the Chumash Casino in its analysis of SR 246:

Draft VISION 2030: SBCAG 2008 Regional Transportation Plan

Section 2.4.6 Santa Ynez Valley, p. 2-38

The Chumash Casino, located between the City of Solvang and the unincorporated Santa Ynez community is a significant visitor destination. With over 500 employees, the Chumash Casino generates traffic that affects SR 246 in both directions. The Santa Ynez Band of Chumash Indians had initiated daily bus service to Lompoc, Santa Maria, and the South Coast to provide an alternative means of travel for its employees and patrons. The Chumash Casino is the largest generator of traffic in the area which contributes to increasing congestion on SR 246.

Questions for proposed revisions:

1. Certainly Casino patrons and buses use SR 246, but most visitors/patrons use SR 154
2. Almost all employees are required to use the bus—significant traffic reduction
3. Is the High School the largest SR 246 generator of traffic?

We note the following CalTrans Report as to SR 246 showing lower levels of service (LOS) in Sub-Segment 6A where SY High School is located as opposed to Segment 6B where the Chumash Casino is located:

### **Transportation Concept Report**

#### **State Route**

#### **246**

May 2004, P. 52

**Sub-Segment 6A** (PMs 30.28-32.12) The next sub-segment runs from Alamo Pintado Road to

Refugio Road. This sub-segment is a 2-lane conventional highway with the eastern portion having a continuous left-turn lane. On the northern side of the route there is a

F.1-1

Class I bike/pedestrian trail running almost the entire length of the sub-segment. The facility is currently at LOS D and is projected to be marginally adequate in 2025. An opportunity does exist to extend the Class I bike lane past the high school to Refugio Road. Truck traffic represents 4% of daily traffic volume.

**Sub-Segment 6B** (PMs 32.12-34.59) The final sub-segment begins at Refugio Road and runs to the junction with SR 154. This sub-segment is a 2-lane conventional highway with portions having a continuous left-turn lane. The current LOS C is projected to drop to LOS C by 2025. The facility is currently adequate and is projected to remain so in 2025. Truck traffic represented 5% of daily traffic volume. The operational issues at the intersection of SR 246 and SR 154 are being addressed in Phase II of the County's Measure D improvements currently included planned along the SR 154 corridor (EA 05-49420). These include turn lanes and evaluation of the intersection lighting.

*Letter F.1*

**COMMENTER:** Sam Cohen, Santa Ynez Chumash

**DATE:** August 15, 2008

Response F.1-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

## Letter F.2

**Aubrey J. Spilde**

---

**From:** Sam Cohen [scohen@santaynezchumash.org]  
**Sent:** Monday, August 25, 2008 1:05 PM  
**To:** Aubrey J. Spilde  
**Cc:** Michael G. Powers  
**Subject:** FW: SBCAG Regional Transportation Plan and Environmental Impact Report Public Hearing Reminder

Other comments

-----Original Message-----

**From:** Neal Olinger [mailto:Neal.Olinger@chumashcasino.com]  
**Sent:** Monday, August 25, 2008 12:02 PM  
**To:** Sam Cohen  
**Subject:** Re: SBCAG Regional Transportation Plan and Environmental Impact Report Public Hearing Reminder

They seem to ignore the fact that 246 has become a major commuting route for santa barbara, lompop and vafb.

From blackberry

----- Original Message -----

**From:** Sam Cohen <scohen@santaynezchumash.org>  
**To:** Frances Snyder; William Wyatt <WWyatt@santaynezchumash.org>; David Brents  
**Cc:** Neal Olinger; Sam Cohen <scohen@santaynezchumash.org>  
**Sent:** Mon Aug 25 11:29:05 2008  
**Subject:** FW: SBCAG Regional Transportation Plan and Environmental Impact Report Public Hearing Reminder

We have requested that the section in the SBCAG Regional Transportation Plan (RTP or RTIP) be revised to include other traffic generators such as the High School.

Please review the attached page and return comments ASAP

Thanks

Sam

---

**From:** aspilde@sbcag.org [mailto:aspilde@sbcag.org]  
**Sent:** Monday, August 25, 2008 8:38 AM  
**To:** Sam Cohen  
**Cc:** mpowers@sbcag.org  
**Subject:** RE: SBCAG Regional Transportation Plan and Environmental Impact Report Public Hearing Reminder

Good morning Sam,

*Letter F.2*

**COMMENTER:** Neal Olinger, Chumash Casino

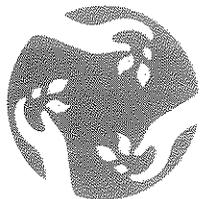
**DATE:** August 25, 2008

Response F.2-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.



received 8/21/08



# Community Environmental Council

Letter O.1

## BOARD OF DIRECTORS

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## PROGRAM AREAS

Architecture 2030  
Challenge

Earth Day Festival

Fossil Free by 33  
Campaign

Get Energized  
Campaign

Green Business  
Program

Regional Energy  
Blueprint

Sustainable  
Land Use and  
Transportation

Mr. Jim Kemp  
Executive Director, SBCAG  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

August 20th, 2008

RE: Public Comments for 2008 draft Regional Transportation Plan

Dear Mr. Kemp and SBCAG,

The Community Environmental Council is a non-profit organization founded in 1970. Since 2004, we have specialized in energy, climate change, and transportation issues. Our goal is to wean our region from fossil fuels by 2030 or sooner, on a net basis.

We appreciate the great work SBCAG has performed over the years and, in particular, your work on transportation issues. We are a partner on many initiatives with SBCAG because SBCAG's role as the regional rideshare agency complements our work ([www.cecsb.org](http://www.cecsb.org)).

Due to the importance of the Regional Transportation Plan (RTP) and the infrequency with which it is updated, we take this process very seriously. CEC believes the draft 2008 RTP Vision 2030 document ("Vision document") is a good start but is generally lacking in a long-term vision appropriate for our region at this point in our development. Energy supply challenges and climate change are the two over-arching issues that must be at the heart of any long-term transportation planning. With oil prices up well over 1,000 percent (reaching \$147 a barrel in August, up from \$10 in 1998) over the last decade and consumers bearing the burden of record high gas prices, the RTP must address this issue head-on. Experts agree that we have or will soon reach a global peak in oil production. The era of cheap energy is, according to all informed sources, over.

AB 32, the Global Warming Solutions Act, was signed into law by Governor Schwarzenegger in 2006, committing the state to reduce its greenhouse gas emissions back to 1990 levels by 2020. The Governor has also signed an executive order to return the state's emissions to 80 percent below 1990 levels by 2050.

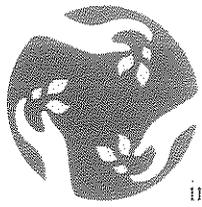
These two issues must be incorporated throughout the RTP. We also recommend that the RTP acknowledge and discuss our efforts to wean our region from fossil fuels by 2030 – a goal that has gained broad community acceptance and praise.

**The "business as usual" approach to congestion and transportation is a bankrupt business model. Our region should undertake a serious and vigorous transformation of our transportation system. This effort should focus on greater efficiency and alternative transportation options, rather than on an unfounded hope that we can continue business as usual without harmful repercussions to our region.**

The DEIR, which tracks the Vision document, could also be significantly improved. In particular, the DEIR should consider a fourth project alternative – **that of a high fuel and high construction price future and a carbon-constrained state.** Many analysts, including top

O.1-1

O.1-2



## Community Environmental Council

investment banks such as Goldman Sachs, believe we could reach \$200 a barrel oil in the next two years (Goldman's most recent prediction, issued on August 22, 2008, is that oil will reach \$149 by the end of 2008). \$200 oil equates to \$7 to \$8 gasoline, which will heavily shift transportation modes away from driving alone. County residents will, through market forces alone, increase rates of ridesharing, mass transit, bicycling, and use of alternative fuels. The role of good government, however, is to make these better transportation options more available and easier to use for residents.

O.1-2

We are already seeing a decline in vehicle miles traveled (VMT) on California's roads, so SBCAG's projections (in 2.4.2 External Traffic, RTP) of a 51 percent to 150 percent increase in vehicle trips on some major highways by 2030 are looking backwards to a continued cheap energy future. **This is a serious if not fatal flaw in the underlying assumptions of the plan and these projections may need to be significantly revised.** At the least, some alternative scenarios should be considered.

In addition, while the DEIR briefly mentions greenhouse gas emissions (4.3d) and acknowledges the state hasn't established significant thresholds, the state scoping process is underway and targets a reduction in VMT, along with more efficient vehicles and a low carbon fuel standard. The RTP should acknowledge the ambitious goals the state has already set. While sector-specific goals have not yet been set, it is clear already that transportation will have to bear much of the burden of reduced emissions because the transportation sector accounts for the largest share of emissions (over 40 percent).

O.1-3

Accordingly, it is important to re-evaluate expenditures in our transportation infrastructure. In particular, alternatives to driving alone need significantly higher funding as local residents are priced out of driving and we enter a carbon-constrained world.

The CEC's recently-completed Transportation Plan for Santa Barbara County describes many ways we can develop and incentivize mobility options that have fewer environmental and social impacts than single occupant driving. While the following options, which are the focus of our plan, are discussed in the RTP, they should receive higher priority and significantly increased funding:

- Ridesharing is extremely promising because it doesn't require any additional infrastructure. Our roads are full of vehicles that are 80 percent empty (only one person). High gas prices, desire to make environmental choices, and technology-based ridesharing that uses the internet and cell phones for matches are ushering in a new era of easy ridesharing. School and event-based ridesharing and using social networks to find matches can build community while saving energy. As 15 percent of commuters already rideshare in our county, this alternative mode can quickly scale up to make an even greater impact. Traffic Solutions is a very important part of our regional transportation planning system and with additional funding could develop more robust transportation demand management programs, pursue technology-based ridesharing and demonstrate innovative ridesharing programs to a national audience.
- Area transit providers and the commuter buses are experiencing exploding growth. Expanding public transit can ensure mobility while cutting energy use, and more riders mean more frequent service is needed, with overall increased system efficiency and reduced cost and environmental impacts per rider as valuable co-benefits. We need to



## Community Environmental Council

make long-term investments in our mass transit infrastructure and ensure that new growth in our cities is transit-friendly.

- Bicycling is the most energy-efficient transportation option ever invented and has great potential to reduce congestion and pollution during shorter trips. Infrastructure for safe, easy, and convenient bicycling encourages people to get out of their cars and try this healthy and active mode of getting around. Cities like Portland, Davis, and many European cities that have invested in bicycling infrastructure have seen impressive increases in bicyclists once safety concerns are addressed and adequate routes are developed.

The CEC Transportation Plan also discusses more efficient vehicles, sustainable biofuels, and electric transportation, which can help residents adjust to higher energy prices and reduce climate change pollution. The RTP doesn't include substantial discussion or projects for any of these options, all of which should be included in any comprehensive transportation plan for our region. Rather than merely list construction projects for our county, the RTP should provide a far-reaching vision for sustainable mobility in our region.

We are entering a very uncertain energy future, where prior trends and development patterns may not apply. The RTP should help our region prepare for various possible futures by including a fourth project alternative that gives priority to alternative transportation in the case of a high fuel price, carbon-constrained world.

If you would like to discuss these matters with CEC staff or receive a copy of our Transportation Energy Plan, please contact our Transportation Specialist, Michael Chiacos at 805-963-0583 ext. 110 or [mchiacos@cecmail.org](mailto:mchiacos@cecmail.org). You can also download our Energy Blueprint for Santa Barbara County at <http://www.communityenvironmentalcouncil.org/EnergyBlueprint/preblueprint.cfm>. Thank you for considering our input.

Sincerely,

Michael Chiacos

Senior Program Associate

Tam Hunt

Energy Program Director / Attorney  
Community Environmental Council

O.1-3

*Letter O.1*

**COMMENTER:** Michael Chiacos, Senior Associate and Tam Hunt, Energy Program Director/ Attorney, Community Environmental Council

**DATE:** August 20, 2008

Response O.1-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

Response O.1-2

The commenter requests that the Draft EIR for the 2008 SBCAG RTP Update consider a fourth project alternative that considers a carbon-constrained world and alternative transportation priority.

The alternatives evaluated in the EIR represent a range of reasonable alternatives, as required by CEQA. Section 15126.6 of the State CEQA Guidelines states that: "An EIR shall describe a range of reasonable alternatives to the project, or to the 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

The inclusion of a fourth alternative that analyzes the future world based on the reasons provided would result in an excessively speculative analysis. Evaluation of market forces and trends exceeds the intent of CEQA to disclose the physical environmental effects of proposed projects. It should be noted that the RTP includes several alternative and public transportation projects that would decrease vehicle use in Santa Barbara County.

Response O.1-3

Refer to Response O.1-1.



**Letter O.2**

SEP - 2 2008

September 2, 2008

Mr. Jim Kemp  
Executive Director, SBCAG  
260 N. San Antonio Road, Suite B  
Santa Barbara, CA 93110

Re: 2008 Draft Regional Transportation Plan and DEIR

Dear Mr. Kemp:

The Comprehensive Planning Committee of the Citizens Planning Association has reviewed the referenced documents. Please consider the following as formal comments on the DEIR.

1. This RTP follows the practice of previous years in primarily being a compendium of projects for which there is some constituency, either among the SBCAG member entities or CALTRANS. The intention is that this collection constitutes a project description.

Section 15126.6 of the California Environmental Quality Act requires that a reasonable range of feasible alternatives to the project be evaluated. SBCAG has attempted to comply with this by considering three alternatives: (1) only currently funded program elements; (2) the project without any program elements that have Class I impacts; and (3) a no project alternative. While all of these are superior (in terms of environmental impacts) to the project, they are not recommended because of not adequately dealing with traffic and safety issues.

O.2-1

We believe, however, that the DEIR's partitioning of the project in terms of what program elements to include or omit has necessarily led to a sterile alternatives analysis.

Given finite resources, a decision to spend money on any given program element reduces the amount available for other program elements. Rather than taking as given (or as part of the project description) the funding allocations embodied in the RTP, there should be discussion of alternatives that carefully compare program elements in terms of their efficacy at meeting transportation and safety objectives; their cost (and likelihood of being funded); and their environmental implications. To let one example serve, what are the relative benefits of performing a freeway widening as compared to enhancing transit services as compared to performing an aggressive TDM (traffic demand management) program? It is comparisons of this sort that should be at the core of the alternatives analysis, not the totally uninteresting alternatives comparison in the DEIR.

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SEP 02 2008

Now it may be argued that this kind of analysis was part of the deliberations of the 101 in Motion Committee and the Technical Advisory and Stakeholder Advisory Committees. But if so, that analysis should be integrated into the DEIR.

2. Put another way, inasmuch as there is a sizeable constituency for a transportation program that aggressively focuses on alternatives to accommodating SOVs (single occupant vehicles), an alternative project with that focus should be one of the alternatives considered in the DEIR. The Community Environmental Council (CEC) has a transportation plan of this sort and this could serve as the basis for a project alternative.

O.2-1

The RTP contemplates total expenditures of approximately 189 million through the year 2030 for the categories Bicycle and Pedestrian, ITS/TDM, and Rail, or 3.7% of the total project costs. A project alternative that more aggressively funded these categories should be part of the DEIR. Now it may be argued that Measure A includes commitments as to how the sales tax revenues would be spent, and to the extent that an alternative has no funding source then that alternative would not be “financially constrained” as required by federal regulations. If this is the argument, then there is circularity in the process that is inconsistent with at least the spirit of CEQA. SBCAG put together Measure A (without CEQA review), and now that measure constrains the alternatives that can be part of the DEIR on the RTP? Please explain how this makes sense.

3. We concur with the CEC statement that the RTP fails to address macro trends that could radically change what transportation options should or will look like in the years ahead. Issues of fuel pricing, concern for climate change, and new transportation modalities (e.g., the growth in shared car usage in cities<sup>1</sup>, and city-wide bicycle sharing) should all be a part of the project and its accompanying CEQA analysis. New technology that encourages ride sharing should also be included<sup>2</sup>. Legislative approaches that would reduce automobile dependency<sup>3</sup> should be part of the discussion.

O.2-2

4. Please comment on the recent decision of Caltrans to halt a major Highway 50 widening plan in Sacramento until they can study whether the expansion will contribute to global warming, this action being taken in response to the Sacramento Court ruling that the environmental review for the project was incomplete without a study of greenhouse gas emissions, and how this decision affects the RTP and associated DEIR.

O.2-3

5. We would recommend that ITS (Intelligent Transportation Systems) not be bundled with TDM (Traffic Demand Management) in the discussion and financial analysis: they are very different animals. ITS in many of its instantiations can be viewed as roadway enhancements in the same way a new lane is: it has the potential to reduce congestion on a particular section of road. TDM, on the other hand, is geared to reducing the number of automobile drivers.

O.2-4

<sup>1</sup> White, J. 2008. Car-Sharing Services Gain in Appeal. Wall St. Journal (August 19, 2008).

<sup>2</sup> Kelley, K. 2007. Casual Carpooling – Enhanced. Journal of Public Transportation (Volume 10 No. 4)

<sup>3</sup> Lifsher, M. 2008. Insurance – Poizner pushes mileage plan. Los Angeles Times (August 28, 2008)

Clearly a lot of work goes into transportation issues in this County. That the RTP lacks the long-term vision that we would wish is probably reflective of the many vested interests in furthering our automobile-centric culture. While their voices are important and need to be heard, a planning document that extends out to the year 2030 needs equally to hear from those who recognize the limitations of business-as-usual transportation models.

O.2-4

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul Hernadi". The signature is fluid and cursive, with the first name "Paul" being more prominent than the last name "Hernadi".

Paul Hernadi, PhD  
Chair, Comprehensive Planning Committee  
Citizens Planning Association

*Letter O.2*

**COMMENTER:** Paul Hernadi, Chair, Comprehensive Planning Committee for the Citizens Planning Commission

**DATE:** September 2, 2008

Response O.2-1

Refer to Response O.1-2. Alternatives to the project were chosen for evaluation based on their ability to reduce environmental impacts while meeting most of the objectives of the project. While an evaluation of alternatives such as those recommended by the commentor may provide useful information, it would not satisfy the CEQA requirement to evaluate alternatives that meet project objectives.

Response O.2-2

Refer to Response O.2-1.

Response O.2-3

Project impacts related to global climate change are described in detail in Section 4.3, *Air Quality*, of the EIR. Please refer to Section 2.0 of this Final EIR for a revised version of the Air Quality section that includes additional detail regarding global climate change.

Response O.2-4

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

## Letter O.3

***Santa Barbara Airport Advocates***  
1032 Diamond Crest Court • Santa Barbara CA 93110-2070  
*sbaadvocates@yahoo.com*

September 2, 2008

Mr. Jim Kemp, Executive Director  
Santa Barbara County Association of Governments  
260 North San Antonio Road, Suite B  
Santa Barbara, California 93110

**Re: 2008 Regional Transportation Plan and Draft EIR**

Dear Mr. Kemp:

I am pleased to write you on behalf of the Santa Barbara Airport Advocates (SBAA). We would like to offer our comments on the 2008 Regional Transportation Plan (RTP) and the draft environmental impact report (EIR).

SBAA is a volunteer organization that advocates on behalf of the Santa Barbara Municipal Airport, which is known to pilots by its international airport identifier KSBA. Our membership consists of local pilots, aircraft owners, and businesses involved in general aviation (the umbrella term for all aspects of aviation other than the airlines and the military). We would like to bring to your attention some specific concerns with respect to the needs of general aviation in Santa Barbara County and at KSBA in particular so that the RTP can fully account for this transportation sector.

We have four primary concerns:

**1. The lack of self-service fuel at KSBA.** Rising aviation fuel costs have become a major impediment to the effective use of air transportation cross the nation. To address this problem, most airports across the nation have self-serve fuel facilities that offer aviation fuel at lower prices. Some local examples include the Santa Ynez, Lompoc, and Santa Maria airports. Santa Barbara, however, does not have self-service fuel at this time. Hence most pilots based at KSBA fly their aircraft to other airports with lower-cost self-service fuel (primarily Camarillo and Santa Paula, both in Ventura County) rather than pay for full-service fuel at Santa Barbara — which has the highest full-service prices anywhere in the state. Indeed, these prices are so high that they deter transient pilots from visiting KSBA. As a result, the transportation utility of the Santa Barbara Municipal Airport for general aviation is considerably compromised.

The Santa Barbara Airport Administration is attempting to bring self-service fuel to KSBA. To encourage them in their efforts, we would like to request that the RTP make specific reference to this issue.

**2. The lack of adequate hangar facilities at KSBA.** The useful life of an aircraft is greatly extended by being stored in a hangar. This protects the aircraft from the damaging effects of ultraviolet (particularly harmful to modern carbon-fiber aircraft) and salt in the atmosphere (which causes corrosion of metal airframes). The RTP as now drafted states that 24 nested T-hangars will be built at KSBA. This project was completed in Spring 2008. However, these new hangars have not nearly met the demand for additional hangar space at KSBA, where there is still a waiting list for hangar space.

O.3-1

The lack of hangars further reduces the value and utility of the airport to the general aviation community.

Building hangars is a long-term project, and there are private developers who would be interested in pursuing a project of this kind at KSBA. We are working with the Airport Administration on this need as well. We would like to request that the RTP make specific reference to the hangar issue as well.

**3. Lack of 24-hour access to general aviation facilities at KSBA.** At most airports across the nation it is straightforward for transient pilots to return to their aircraft in the evening or early morning: either there is open access to the airport ramp (as at Santa Ynez) or the local fixed-base operators provide 24-access to the ramp via their main desk (as at larger airports such as Van Nuys or Orange County). At KSBA, however, transient pilots are unable either to leave the airport if they land after hours or to return to their aircraft if they come to the airport after hours. (The local fixed-base operators can provide after-hours access, but their fees are so high that pilots refrain from using this service.) This makes it less likely for pilots from outside Santa Barbara to visit our airport for business or pleasure.

O.3-1

The security of aviation facilities is a paramount concern in the modern world. However, we believe that these concerns should be addressed in a manner that causes the least possible interference with the efficient use of the airport. We would like to request that the issue of ramp access for transient pilots be specifically addressed in the RTP.

**4. Lack of city-owned transient aircraft parking at KSBA.** At the present time the only parking available to transient aircraft at KSBA is through the fixed-base operators, who charge a substantial fee for even short-term parking unless a minimum amount of fuel is purchased. (This is in sharp contrast to the situation at Santa Ynez, Lompoc, and Santa Maria, where there are no such fees.) This is a further disincentive for the general aviation community public to use the Santa Barbara Airport. City-owned transient parking should be made available and placed adjacent to the self-service fueling facility. We would like to request that this issue be referred to in the RTP.

Addressing these four concerns would tremendously increase the utility of the Santa Barbara Municipal Airport and make it a more efficient component of the regional transportation system.

I would appreciate the opportunity to discuss these issues further with you or your staff. I can be reached at (805) 689-4111.

Sincerely yours,



Roger Freedman, President  
Santa Barbara Airport Advocates

cc: Santa Barbara Airport Administration

*Letter O.3*

**COMMENTER:** Roger Freedman, President, Santa Barbara Airport Advocates

**DATE:** September 2, 2008

Response O.3-1

The commenter identifies four areas of concern relating to aircraft transportation in the RTP. In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

## Letter O.4

**Aubrey J. Spilde**

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**From:** Michael G. Powers  
**Sent:** Tuesday, September 02, 2008 1:49 PM  
**To:** Aubrey J. Spilde  
**Subject:** FW: RTP comments

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**From:** WILLFONG SINGH [mailto:flyer1@cox.net]  
**Sent:** Tuesday, September 02, 2008 12:27 PM  
**To:** SBCAG Information Requests  
**Cc:** Salud Carbajal  
**Subject:** RTP comments

**To all it may concern @ SBCAG:**

**As a parent representative of the Safe Routes to School committee at Cold Spring School, Montecito, I would like to comment on the most recent RTP presentation to SB Board of Supervisors. We were not able to be at meeting and I do not know if Barker Pass has been put on RTP.**

**The SR2S committee has repeatedly asked for alternative transport lanes for Barker Pass. Barker Pass has become a heavily used detour arterial road. We have approximately 20 students who attempt to walk/bike safely to school on this road. Barker Pass needs either fog striping, bike lanes, and or trails. We hope something can be accomplished with your help .**

**Thank you for your time and efforts.  
Tracey Singh  
Safe Routes to School, Cold Spring School  
805 403 3589**

O.4-1

*Letter O.4*

**COMMENTER:** Tracy Singh, Safe Routes to School Committee at Cold Springs School

**DATE:** September 2, 2008

Response O.4-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.



**Letter I.1**

**EUGENE S. WILSON**  
ATTORNEY AT LAW

1224 NORTH ONTARE ROAD  
SANTA BARBARA, CALIFORNIA 93105  
805-683-4648

September 2, 2008

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VIA FACSIMILE AND PERSONAL DELIVERY

SEP 02 2008

Mr. Jim Kemp, Executive Director  
Santa Barbara County Association of Governments  
260 North San Antonio Road, Suite B  
Santa Barbara, California 93110

Santa Barbara County  
Association of Governments

Re: 2008 Santa Barbara County Regional Transportation Plan  
Draft Program Environmental Impact Report

Dear Mr. Kemp:

This letter will constitute comments regarding the Santa Barbara County Association of Governments (SBCAG) 2008 Santa Barbara County Regional Transportation Plan (RTP) and the Draft Program Environmental Impact Report (DPEIR) on the RTP. While these comments focus on some of the primary issues raised by the DPEIR, they are not an exhaustive discussion of all issues.

1. Failure to Analyze Energy Impacts

The DPEIR does not quantify or analyze energy impacts that it recognizes will be significant. (DPEIR at 4.12.2.) The conclusions of the EIR concerning energy impacts must be supported by empirical data, scientific authorities, and explanatory information. Each of the proposed alternatives in the DPEIR and the proposed plan contains a list of projects. The DPEIR should quantify the impacts of these on energy. No criteria of significance are used. Instead the DPEIR consists of generalities that have little direct connection to the RTP and conclusory statements regarding impacts and mitigation.

I.1-1

There is no discussion of (i) the project's energy requirements and its energy use efficiencies, (ii) its effects on energy supplies and requirements for additional capacity, (iii) the degree to which the project complies with existing energy standards, (iv) the project's effects on energy resources, and (v) the project's projected transportation energy use and its overall use of efficient transportation al-

I.1-2

ternatives. The discussion of oil production in Santa Barbara County does nothing to further the analysis.

The DPEIR fails to consider the impacts of future reductions in oil supply and increases in oil prices due to the reduced availability of low cost crude oil supplies. During the gasoline price surge in May, 2008, the New York Times reported, "Mass transit systems around the country are seeing standing-room-only crowds on bus lines where seats were once easy to come by. Parking lots at many bus and light rail stations are suddenly overflowing . . . ." <sup>1</sup> Amtrak has reported a 12 percent growth in ridership on the Surfliner over 2007. <sup>2</sup>

I.1-2

Within the 30-year horizon of the RTP, the region will experience disruptions in transportation energy supplies and substantial fuel price increases beyond what we are paying today. <sup>3</sup> The DPEIR inexcusably fails to consider how these issues affect its energy analysis, its transit plan, and the alternatives.

There is no discussion of an energy-efficient alternative and no discussion of the efficiencies of transit. The Environmental Justice section fails to recognize that the RTP diverts the limited funds available for operation of transit to capital projects benefiting those who can afford to always drive a car. It does not provide a robust regional transit system which is more economical and is needed by lower income populations.

I.1-3

There is no analysis or acknowledgement that the use of a one-half cent sales tax to pay for the hidden-costs of automobiles encourages energy consumption. SBCAG's May, 1995, Alternatives Analysis of Highway 101 Corridor Final Report acknowledges,

The costs of infrastructure built to accommodate auto traffic are often underestimated in a general economic sense under the assumption that they encourage economic development. That causes alternatives to new roadway construction, such as the Enhanced Bus Transit alternative, to be at a competitive disadvantage since many of the costs associated with the Highway 101 widening alternative are externalized and borne by society rather than the user

I.1-4

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<sup>1</sup> "Gas Prices Send Surge of Riders to Mass Transit," New York Times (May 10, 2008).

<sup>2</sup> Amtrak News Release, "Amtrak California Corridor Ridership Continues to Soar in July" (August 21, 2008)

<sup>3</sup> L. Brown, Plan B 3.0 at 29 (Norton 2008).

(M.W. Cameron, Efficiency and Fairness on the Road: Strategies for Unsnarling Traffic in Southern California, 1994).

The plan fails to recognize that by discounting the cost of driving, it encourages commuting by car and increases all the negative impacts associated with that mode of transportation. More automobile travel results in increased impacts across the board, such as increased greenhouses gas emissions, increased air pollution, impacts on traffic circulation and parking facilities, and other impacts identified in the DPEIR.

I.1-4

SBCAG's own analysis shows the travelling public's transportation choices are those of rational economic consumers.

Extensive research in travel mode choice behavior has concluded that people act as rational economic consumers of travel, choosing the mode that provides them the least perceived "generalized cost" for a given trip, in terms of both travel time and monetary costs, as well as "quality of service" factors such as comfort, convenience of use, and reliability of arrival times.

(Alternatives Analysis at S-4, S-10.) The DPEIR needs to recognize and analyze these impacts and alternatives to them such as a gas tax. The DPEIR conclusions are not supported by substantial evidence.

The DPEIR does not recognize the impact of providing more freeway capacity on energy consumption. By providing additional freeway capacity, SBCAG encourages more individuals to commute by single occupancy vehicle. This will cause an increase in the amount of commuting and defeats the anticipated benefits of the RTP on congestion and air pollution.

The simple truth is that building more highways and widening existing roads, almost always motivated by concern over traffic, does nothing to reduce traffic. In the long run, it actually increases traffic. This revelation is so counterintuitive that it bears repeating: adding lanes makes traffic worse . . . [T]he phenomenon has been well documented, most notably in 1989, when the Southern California Association of Governments concluded that traffic-assistance measures, be they adding lanes, or even double-decking the roadways, would have no more than a cosmetic effect on Los Angeles' traffic problems. The best it could offer was to tell people to work

I.1-5

closer to home, which is precisely what highway building mitigates against. . . .

There is no shortage of hard data. A recent University of California at Berkeley study covering thirty California counties between 1973 and 1990 found that, for every 10 percent increase in roadway capacity, traffic increased by 9 percent within four years time.

... "Trying to cure traffic congestion by adding more capacity is like trying to cure obesity by loosening your belt."

The question is not how many lanes must be built to ease congestion but how many lanes of congestion you want. <sup>4</sup>

The flip side of this is that encouraging commuters to use their cars negatively impacts mass transit. A robust public transit system that provides people with convenient and economical alternatives becomes more difficult to achieve because demand is down. Greg Hart, who is now Public Information Coordinator for SBCAG, stated as follows,

If you widen the freeway, you undercut the ridership base for buses and trains," said Santa Barbara Councilman Gregg Hart, an association board member.

Moreover, these impacts are all the more significant in light of the social and economic impacts connected with an inefficient transportation system. Middle and lower income families necessarily must commute to work, school, and other activities. By focusing the vast majority of the limited transportation budget on automobile transportation, the RTP denies the public a convenient, safe, and economical alternative to travelling by single-occupancy-vehicle. Transit is not near enough nor frequent enough to meet the needs of the majority of the general public in Santa Barbara County. Hence large numbers of people are required to devote an ever-increasing percentage of their limited family budget to energy and automobile expenses in order to obtain basic transportation.

As energy costs continue to increase, the economic problem will become increasingly severe for these families. This situation is particularly significant on the South Coast where the high cost of housing means that many employees must commute long distances to affordable housing. For some increased energy

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<sup>4</sup> Suburban Nation, *supra*, at 88.

I.1-5

I.1-6

costs will mean they can no longer continue to work here. Commuting costs are also a significant economic impact on South Coast employers who may be unable to attract and retain suitable employees because of the high cost of housing and a lack of affordable transit. The DPEIR needs to recognize that energy impacts are much more significant in light of the related social and economic impacts.

I.1-6

## 2. The DPEIR Does Not Contain an Adequate Analysis of Alternatives.

The alternatives considered in the DPEIR are patently infeasible and do not appear to have been selected with any concern for the urgent environmental issues that are raised by regional transportation systems in California today. The alternatives are:

- a. No Project. This assumes an immediate and permanent cessation of capital improvements for regional transportation.
- b. Program Project Alternative. This alternative assumes that the RTP is not updated and that there will be no further funding for regional transportation after currently funded projects have been constructed. (DPEIR at 6-1.)
- c. Modified Project Alternative. This alternative eliminates certain projects with the potential to create Class I impacts (significant but unavoidable). (DPEIR at 6-4.)

I.1-7

The Program Project Alternative, which includes only currently funded projects, is not feasible. It suggests that SBCAG would build no projects in the future other than those that are "currently funded." Even if Measure A did not pass, SBCAG anticipates it would still receive close to four billion dollars in funding between now and 2030. There is no explanation of any potential scenario where SBCAG would lose all future funding. This alternative is not feasible and does nothing to assist the public or the agency in reaching a sound judgment.

The Modified Project Alternative primarily consists of removing 18 projects which might involve the conversion of agricultural land. The DPEIR states that this farmland is primarily "narrow strips of agricultural land along existing right-of-way" and further that "in all likelihood, many individual projects would not create significant impacts." (DPEIR at 4.2-6 – 4.2-7.) Thus the Modified Project Alternative is, to a large degree, nothing but a completely unrealistic suggestion involving an pseudo-effort to save several small strips of agricultural land.

This selection of alternatives shows that the DPEIR does not make a serious effort to address the crucial transportation issues facing our region and our country over the 30-year horizon of the RTP. As discussed herein the region faces critical issues relating to the impacts of traffic on local streets and parking, the impacts on energy and on families, the impacts on transit, the impacts environmental justice issues, and impacts on greenhouse gases. To be of use the DPEIR must address a reasonable range of issues that will foster informed decision-making, rather than mechanically analyzing the pros and cons of possibly saving a few small strips of agricultural land.

I.1-7

The DPEIR is required to emphasize feasible alternatives to the project. Pub. Res. Code § 21003(c). The DPEIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The DPEIR fails to explain how the alternatives were selected for analysis and it fails to provide substantial evidence to compare the alternatives with the proposed project.

The goals contained in the RTP do not appear in the DPEIR and have not been analyzed. The DPEIR assumes that commuter rail will be built and will contribute to eliminating congestion on Highway 101. (DPEIR at 4.1-17.) However, SBCAG has no ability to establish commuter rail or to operate it. Rather the RTP diverts funds away from operating commuter rail and focuses on building freeway projects. Hence the impacts analysis is erroneous. Commuter rail will not be built and will not help reduce congestion on Highway 101.

I.1-8

The alternatives analysis should include a robust transit alternative. It should analyze the use of rail for movement of people and goods and as an economic stimulus. It takes fifteen lanes of highway to move as many people as one lane of track.\* The DPEIR should analyze how bicycle use can be made safer and promoted as a healthy and environmentally-preferable alternative.

I.1-9

The consideration of alternatives is also unrealistic because it fails to recognize that approval of Measure A—which would raise funds that can be used to operate mass transit—will instead divert the potential operating funds to capital projects such as freeway widening. STIP funds cannot be used for operating expenses. The net result of approving Measure A is to divert the one major source that could fund the operation of a robust mass transit system to freeway capital

I.1-10

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\* Parsons Brinckerhoff, "101 in Motion Final Report" (SBCAG July, 2006).  
\* Stanley Hart and Alvin Spivak, The Elephant in the Bedroom, 111; James Howard Kunstler, Home from Nowhere 67, 99; see generally [www.freighttrailworks.org](http://www.freighttrailworks.org)

projects. This severely constrains the region in the future with respect to responding to increased demand for transit. This compels people to use their cars which will result in substantially increased impacts on congestion, air quality, etc.

I.1-10

Policy-makers need to consider the alternative of using a gasoline tax for road maintenance and improvements as many cities have recently done.<sup>7</sup> The gasoline tax is an environmentally preferable alternative because it does not subsidize the use of automobiles as does a sales tax. It gives the public a choice as to what type of transportation system they wish to fund.

I.1-11

### 3 The DPEIR Does Not Contain a No Project Alternative

The DPEIR states that the no project alternative "assumes that no new capital improvement projects are funded or implemented after 2008." (DPEIR at 6-6.) It states that traffic projections were also based on a "no build" scenario that assumes no transportation infrastructure improvements." (DPEIR at 4.1-16.) CEQA Guideline 15126.6(e)(3)(A) provides that "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future." Accordingly, the DPEIR does not contain a sufficient no project alternative. Further the DPEIR does not contain an accurate analysis of the impacts of the RTP or any analysis of what would occur if Measure A were not passed.

I.1-12

### 4. Greenhouse Gas Emissions

The DPEIR concludes that CO2 emissions will increase by roughly 50 percent over the life of the RTP. It offers no alternative that would address this impact. It dismisses this issue stating, "on a global scale, this represents a miniscule amount of the total internationally." The DPEIR concludes that this project will not lead to a worldwide increase in temperatures. (DPEIR at 4.3(d).) The DPEIR then uses this conclusion to avoid any responsibility in the RTP to address climate change issues. In spite of its platitudes to the contrary, the DPEIR and the RTP inexcusably fail to accept or address our local responsibility to address climate change issues.

I.1-13

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<sup>7</sup> "Implementing a Local Gas Tax," Ashland, Oregon.

This approach is completely at odds with public policy in the State of California and with the wishes of the public. The June 19, 2008, Technical Advisory from the Governor's Office of Planning and Research provides,

The potential effects of a project may be individually limited but cumulatively considerable. Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful consideration, supported by substantial evidence.

I.1-13

The DPEIR does not identify and analyze the cumulative impacts and fails to provide substantial evidence for its conclusions.

#### 5. Impacts on Local Streets, Interchanges, and Parking

Greg Hart, now Public Information Coordinator for SBCAG, was quoted as follows:

If you widen the freeway, you undercut the ridership base for buses and trains," said Santa Barbara Councilman Gregg Hart, an association board member. "You won't have enough money to do both. A wider freeway would get full of traffic very quickly. Downtown Santa Barbara would be clogged all the way to Goleta.

I.1-14

These impacts have been intentionally omitted from the DPEIR. "The RTP focuses on transportation projects of regional significance, and therefore the analysis of the Plan's impacts has been limited to impacts on facilities of regional significance." (DPEIR at 4.1-16.) To the contrary, the scope of the project does not determine the scope of the impacts analyzed. The increased traffic on Highway 101 will have a significant indirect impact on congestion, parking, and air quality in the City of Santa Barbara. This impact must be identified and analyzed in the DPEIR.

The DPEIR utterly fails to alert the public to this crucial impact and only notes in passing the increased traffic on Highway 101.

Table 4.1-5 shows an additional 10.7 lane miles at LOS E-F for the 2030 Planned scenario on the segment between Milpas Street and Hollister Avenue when compared with the 2030 Programmed scenario. This can be attributed to higher peak hour volumes on the segments of U.S. 101 between Milpas Street and Route 217/Patterson Avenue.

In other words, within the heart of the City of Santa Barbara, the impact of the RTP is to create freeway gridlock. Traffic congestion that now occurs south of the city is brought into the city where it is closer to heavily populated neighborhoods and air quality and noise are a greater problem. Higher traffic volumes on the freeway will result in a substantial increase in traffic on local streets and impacts on parking facilities which must be considered and analyzed before adopting the RTP. A robust transit alternative would provide mobility more quickly, at a lower cost, and would avoid these impacts.

There is already a shortage of local arterials in the City of Santa Barbara. State Street is the only significant traffic route connecting the city. The impact on State Street of further traffic is significant resulting in greater noise, air pollution, traffic congestion, and safety difficulties for cyclists and pedestrians. It also conflicts with efforts of the City of Santa Barbara to create a more pedestrian friendly atmosphere.

I.1-14

Additionally, the traffic modeling that SBCAG has used in projecting traffic flows is flawed in that it fails to take into account induced traffic impacts, discussed in detail above.

The DPEIR fails to note that the freeway interchanges within the city of Santa Barbara are already operating at full capacity. The DPEIR ignores the fact that these freeway interchanges will be severely impacted by the increased traffic anticipated within the city and will need to be rebuilt at considerable expense.

The plan further overlooks the negative impact of increased automobile traffic on healthy activities such as cycling and walking. When more traffic occurs on local streets, it becomes more dangerous and unpleasant to bicycle or walk. Residential neighborhoods become less desirable. This negatively impacts human health and indirectly increases the use of automobiles for transportation. This particularly affects lower-income groups that are concentrated near the downtown area.

It is widely recognized that the introduction of substantially more vehicles into the Santa Barbara area is a significant problem for the city, and these impacts must be addressed in the DPEIR.

## 6. Growth Inducing Impact

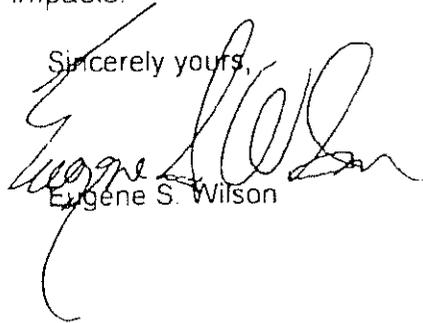
An EIR must analyze any significant effects the project might cause by bringing development and people into the area affected. Guidelines § 15126.2(a). The DPEIR includes only vague generalities and no analysis or substantial evidence

I.1-15

Mr Jim Kemp, Executive Director  
September 2, 2008  
Page 10

of the growth-inducing impacts. (DPEIR at 5.1.) By increasing traffic flows into the South Coast the RTP will magnify the already severe pressure that exists to develop prime agricultural land along the South Coast and to build in areas of scenic beauty. There is not sufficient analysis of these issues nor is there substantial evidence for dismissing these impacts.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Eugene S. Wilson". The signature is fluid and cursive, with a long, sweeping underline that extends below the printed name.

Eugene S. Wilson

I.1-15

Letter I.1

COMMENTER: Eugene S. Wilson, Attorney at Law

DATE: September 2, 2008

Response I.1-1

The commenter states an opinion that the DEIR does not adequately analyze energy impacts, stating that no significance criteria are used and suggesting that the DEIR should quantify the energy impacts of individual RTP projects.

As the commenter correctly notes, the DEIR does not quantify energy consumption associated with individual RTP projects. Any attempt to quantify energy consumption associated with individual projects would be speculative as consumption would depend on a variety of site- and project-specific factors that cannot be determined as part of a programmatic analysis. Moreover, quantification of energy consumption for individual projects would not provide any information that is useful in any meaningful sense as it would not yield information about whether adequate energy supplies may be available in the future.

The contention that the DEIR does not include a threshold of significance for air quality impacts is incorrect. As noted on page 4.12-2 of the DEIR, a significant impact would occur if the project involved the "inefficient, wasteful and unnecessary consumption of energy."

Finally, it should be recognized that most of the projects envisioned in the RTP would not in actuality increase energy consumption in Santa Barbara County. To the contrary, many of the RTP projects (roadway improvements, for example) are specifically intended to improve the efficiency of the County's transportation system, thus reducing unnecessary engine idling and energy consumption. Other RTP projects encourage alternative transportation modes, such as bicycling, walking, and public transit use, that are specifically aimed at reducing use of the drive alone automobile and associated energy consumption.

In response to this comment, Impacts E-1 and E-2 in Section 4.12, Energy, were reexamined. Based on this reexamination, it was determined that the analysis actually overstates the impact of the RTP on energy consumption as it is not anticipated that any RTP projects would involve the wasteful or unnecessary consumption of energy. As such, Impacts E-1 and E-2 have been rewritten to read as follows:

*Impact E-1      Energy consuming equipment and processes which will be used during construction and maintenance of RTP projects would require the use of energy. However, it is not anticipated that energy would be consumed in a wasteful or unnecessary manner. Therefore, such impacts would be Class III, less than significant. ~~H, significant but mitigable.~~*

*Construction and maintenance ~~Implementation~~ of the proposed RTP projects would result in both short-term and long-term consumption of energy due to the use of construction equipment and processes. ~~impacts to the county's energy supply.~~ During construction activities, energy would*



*be needed to operate construction equipment. In addition, construction materials require energy to be made and would likely be used in projects that involve new construction or replacement of older materials. However, such construction and maintenance activities would be undertaken only as necessary and, as such, would not involve any wasteful consumption of energy. Therefore, impacts to energy due to construction and maintenance of RTP projects would be less than significant.*

*Mitigation Measures. Although RTP project construction and maintenance is not expected to involve the wasteful or unnecessary consumption of energy, the following mitigation measures are recommended to reduce address potential impacts to energy consumption to the maximum degree feasible supplies:*

- E-1(a)** Use alternatively fueled construction equipment, where feasible, such as natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.*
- E-1(b)** Recycled construction materials shall be used whenever feasible.*
- E-1(c)** Waste materials from construction or demolition shall be recycled whenever feasible. Materials that can be recycled include but are not limited to asphalt, concrete, brick, lumber, gypsum wallboard (drywall), cardboard and other packaging, roofing material, ceramic tile, carpeting, plastic pipe and steel. Asphalt removed from roads and paved structures shall be recycled.*

*Significance After Mitigation. Impacts would be less than significant without mitigation. Implementation of the above measures would further reduce energy consumption. potential impacts to a less than significant level.*

***Impact E-2** The operation of some RTP projects may increase energy demand. However, in a general sense, RTP implementation would increase the efficiency of the County's transportation system and increase opportunities to use alternative transportation modes that reduce energy consumption. As such, this impact would be Class III, less than significant. This impact is considered Class II, significant but mitigable.*

*Construction and expansion of transportation facilities throughout the county may generate additional energy demand. Some highway and roadway improvements will increase vehicle capacity, allowing a greater number of vehicles to use the facilities. However, increasing capacity and making roadway and intersection improvements will increase the transportation system efficiency, in turn, increasing fuel combustion efficiency in vehicles. In addition, many RTP projects (e.g., bikeway and pedestrian projects, rail projects, transit projects, and TDM projects) would improve the availability of alternative transportation modes in the County. Generally, the availability of these alternative modes would be expected to reduce overall motor vehicular trips, vehicle miles traveled, and associated energy consumption. It is not anticipated that implementation of individual RTP projects would induce the wasteful or unnecessary consumption of energy. Therefore, impacts would be less than significant.*

*New facilities that require energy for operation, such as buildings, signal lighting, changeable message signs, roadway or parking lot lighting, and electronic equipment will increase energy*

*demand. New landscaping irrigation also increases energy demand through water pumping and treatment. However, energy consumption is not anticipated to be wasteful or unnecessary as it is anticipated that all lighting, signage, and irrigation systems would be comply with applicable energy efficiency requirements. Therefore, impacts relating to these systems would be less than significant.*

*Mitigation Measures. The RTP proposes many projects that will provide greater opportunity for county residents and visitors to use alternatives to single occupancy vehicle trips for transportation and reduce the demand for energy used in transportation. The proposed RTP also includes policies that encourage land use planning that encourages walking, biking, and transit use. In addition, the following mitigation measures are ~~required~~ recommended to reduce potential impacts to energy:*

*E-2(a) New facilities shall be designed with energy-efficient equipment and passive solar design (e.g., orientation of building to maximize natural heating and cooling, solar water heating, use of daylighting, and placement of trees to aid passive cooling, protection from prevailing winds, and maximum year-round solar access), provided that additional capital costs are offset by estimated energy savings during the first 5 years of operation. Other improvements with longer payback periods should be considered.*

*E-2(b) All lighting shall be energy efficient and designed to use the least amount of energy to serve the purpose of the lighting. Lighting shall utilize solar energy wherever feasible.*

*E-2(c) New landscaping design and irrigation systems shall be water efficient.*

*Significance After Mitigation. Impacts would be less than significant without mitigation. Implementation of the above measures would further reduce countywide energy consumption potential impacts to a less than significant level.*

### Response I.1-2

The commenter reiterates the opinion regarding the discussion of energy requirements and suggests that the DEIR should discuss energy requirements and standards, as well as potential future reductions, disruptions, and price increases relating to oil and other energy supplies. Please see Response I-1.1. As noted in that response, the DEIR considers the RTP's impact to energy supplies significant if the project would result in wasteful or unnecessary energy consumption. Because wasteful or unnecessary energy use is not anticipated, impacts would be less than significant under CEQA and the factors mentioned by the commenter would be irrelevant to the EIR analysis. With respect to future disruptions of energy supplies, it would be speculative to try to predict when and to what degree global energy supplies may be reduced at some point in the future and what effect such global factors may have on transportation in Santa Barbara County. Regardless, global energy issues would not be an environmental effect of the RTP and are therefore not relevant to the EIR.

### Response I.1-3

The commenter notes that there is not discussion of an "energy-efficient alternative" and suggests that the environmental justice section fails to recognize the diversion of RTP funds from transit to capital projects. As required by CEQA, the alternatives studied in the DEIR



attempt to reduce or eliminate the identified significant environmental effects of the proposed RTP. Because the proposed RTP would not have any significant impacts to energy (see Response I.1-1), analysis of an “energy-efficient alternative” as suggested by the commenter is not warranted. With respect to environmental justice, contrary to what the commenter suggests, the proposed RTP includes a range of projects that would enhance transit service throughout the County. As discussed in DEIR Section 4.13, it is not anticipated that implementation of the RTP would disproportionately affect low income or minority groups.

#### Response I.1-4

The commenter suggests that a one-half cent sales tax would discount the cost of driving, thus encouraging commuting by car and increasing energy consumption. The Measure A tax to which the commenter refers provides funds for a range of projects, including roadway improvements, transit improvements, and bike and pedestrian programs. Contrary to what the commenter suggests, the Measure A funds are not to be used exclusively for road projects. Regardless, it would be speculative for the EIR to predict what effect making road improvements may have on travel choices of Santa Barbara County residences and associated impacts to energy supplies.

#### Response I.1-5

The commenter states an opinion that by providing more freeway capacity, the RTP would encourage more people to commute by single occupancy vehicle and harm mass transit. This opinion is noted. However, again it would be speculative to try to predict to what degree implementation of any given highway improvement may affect travel choices. That said, it should be recognized that the primary purpose of the planned freeway capacity enhancements to address existing capacity issues on the local freeway system. Consequently, rather than encouraging future increases in vehicular travel, the primary purpose is to relieve existing freeway congestion, which would generally reduce engine idling and associated energy consumption. Again, it should be noted that the RTP includes numerous transit enhancements. Consequently, although it is not known to what degree such enhancements may increase transit use, implementation of the RTP would increase opportunities for transit use.

#### Response I.1-6

The commenter suggests that the DEIR should consider the social and economic consequences of the RTP. It is not the EIR’s purpose to address social and economic impacts of proposed actions. CEQA’s purview is narrowly limited to analysis and identification of the environmental effects of proposed actions. As described in Section 15131(a) of the CEQA Guidelines, “Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate social or economic changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.” An evaluation of the physical impacts related to the social and economic factors referenced by the commenter would be too speculative to provide a meaningful analysis. As described in Section 15145 of the CEQA Guidelines, “If, after thorough investigation, a Lead Agency finds that a particular impact is too



speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.”

#### Response I.1-7

The commenter states an opinion that the EIR alternatives analysis is not adequate, suggesting that a broader range of alternatives needs to be considered. This opinion is noted. However, as required by CEQA, the alternatives analysis is focused on addressing the significant impacts of the proposed RTP that cannot be reduced to below a level of significance through proposed mitigation measures. The identified significant impacts associated with the RTP relate to agricultural resources, aesthetics, and biological resources. The Modified Project Alternative would avoid the significant impacts in these areas by eliminating from the RTP those individual projects for which unavoidably significant impacts have been identified. Thus, CEQA’s intent with respect to the analysis of project alternatives has been realized. The identified alternatives, including the Modified Project Alternative, are physically feasible and would reduce or eliminate significant environmental effects of the proposed project, as required by CEQA.

#### Response I.1-8

The commenter suggests that the DEIR is erroneous insofar as it assumes that a passenger rail project will be built from Camarillo to Goleta. The opinion that SBCAG has no ability to establish or operate a commuter rail line is noted. However, it should be recognized that SBCAG will not build or operate many of the projects identified in the RTP. Construction and operation of transportation projects is not SBCAG’s role in the transportation planning process. Construction and maintenance is generally the responsibility of local governments.

#### Response I.1-9

The commenter states an opinion that the DEIR should include a “robust transit alternative” as well as how bicycle use can be made safer. As discussed in Response I.1-7, the purpose of the DEIR alternatives analysis is to consider alternatives that reduce or eliminate the significant environmental effects of the proposed RTP. The alternative suggested by the commenter would not directly address any of the significant effects of the project in the areas of agricultural resources, aesthetics, and biological resources. Similarly, it is not the DEIR’s purpose to examine ways in which bicycle use can be made safer. The purpose is to identify the significant environmental effects of the proposed RTP.

#### Response I.1-10

The commenter states an opinion that the alternatives analysis fails to recognize that Measure A would divert funds from transit to capital projects. Please see Response I.1-4.

#### Response I.1-11

The commenter states an opinion that policy-makers need to consider a gasoline tax. This opinion is noted. Implementation of a gas tax is not a feasible measure to reduce identified impacts. The idea of adopting a countywide gas tax, instead of renewing Measure D, was floated by members of the public, and some SBCAG board members, in the aftermath of the

defeat of Measure D in 2006. This idea was discussed at a meeting of the SBCAG board on February 15, 2007. Staff reported that a gas tax of approximately 22 cents per gallon would have to be levied in the county to replace the revenue lost by the expiration of Measure D in 2010. Gas taxes are arguably the most unpopular form of taxation, one of the “third rails of politics.” Legislatures generally have avoided raising gas taxes, even to keep pace with inflation, because of their concern about a public backlash. The federal gas tax of 18.4 cents per gallon and the State gas tax of 18 cents per gallon have not been increased by Congress or our state legislature since 1994 and 1993, respectively, primarily for that reason. There is no reason to think that two thirds of local voters would support a new tax of 22 cents\ gallon when increases in federal and State gas taxes of tenths of a cent are opposed vigorously by the public. In February 2007, even before the recent spike in fuel prices, the SBCAG board realized that a countywide gas tax was not a viable alternative to renewing Measure D. The board voted unanimously not to pursue a gas tax and to concentrate on renewing Measure D. Additionally, implementation of a gas tax runs counter to sound environmental, energy and fiscal policy to tie critical public infrastructure programs (roads, bridges and public works maintenance) to continued usage of a rapidly depleting resource it is SBCAG’s intention to minimize the use of. In addition, with increasing gas mileage and alternative fuel vehicles, a gas tax is an unreliable source to fund long term funding programs needed for infrastructure development. Hybrid and alternative fuel vehicles use the roads, too, along with transit and commercial transport, and funding all infrastructure projects solely on local gas purchases is unrealistic and unworkable.

#### Response I.1-12

The commenter suggests that the no project alternative should consider buildout of the current RTP rather than a “no new transportation improvements” scenario. This opinion is noted. The CEQA Guidelines section to which the commenter refers states that the discussion of the no project alternative will usually compare the effects of a proposed regulatory plan to continuation of the existing plan. For the RTP, it was determined that such an approach would not provide meaningful information as such a comparison would simply involve comparison of two lengthy lists of projects, many of which appear on both the current and proposed plans. Moreover, not updating the RTP is not a realistic option as state and federal laws require SBCAG to adopt an updated RTP every five years.

#### Response I.1-13

The commenter states disagreement with the approach and conclusions of the analysis of greenhouse gas emissions. This opinion is noted. However, contrary to what the commenter suggests, the forecast increase in greenhouse gas emissions in the County by 2030 is not a result of the RTP, but rather a result of forecast population and associated energy growth. The analysis in Section 4.3 actually indicates only a 2% increase in greenhouse gas emissions under the 2030 RTP “Programmed” scenario as compared to the 2030 “no build” scenario and a 2% reduction for the 2030 RTP “Planned” scenario as compared to the 2030 “no build” scenario.

#### Response I.1-14

The commenter reiterates a concern about freeway widening and suggests that the DEIR analysis fails to address the impacts of freeway widening on the City of Santa Barbara. The



opinion regarding freeway widening is again noted. As discussed previously, the primary purpose of proposed freeway widenings is to address existing congestion as a number of freeway segments in the County already operate at poor service levels. Freeway widenings would not in themselves create higher levels of traffic. Rather, population and economic growth are the generators of traffic and proposed enhancements to freeways (and, indeed, all roadways) respond to past and predicted future growth. It should again be noted that the RTP includes a wide array of transportation improvements, including enhancements of transit service, bicycle and pedestrian facilities, and transportation demand management programs.

Response I.1-15

The commenter suggests that by increasing traffic flows, the RTP will increase pressure for the development of prime agricultural land. This opinion is noted. As noted previously and in the DEIR, the RTP would not induce growth, but rather is intended to respond to past and predicted future growth by planning for transportation enhancements that meet the needs of Santa Barbara County.

## Letter I.2

**Aubrey J. Spilde**

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**From:** T Kiele CHANG [tkcdesigns@mac.com]  
**Sent:** Monday, September 08, 2008 3:29 PM  
**To:** Aubrey J. Spilde  
**Subject:** revised font of text of graphics ...

a new intra-county,  
multi-transport,  
solar power grid system,  
santa barbara county, usa

A Concept Plan for a new Regional and Local,  
Solar Power, Multi-Transportation, Grid System  
consisting of Fifteen Primary, Intra-County, Solar  
Urban Transport Plaza Hubs.

The purpose of this new Solar Power Urban Plaza Hub County Network is

- to Connect our Existing Highway Systems with our Existing Rail System, and
- to acknowledge Primary Points of Convergence
- while supplying essential, self-regenerative, solar and wind energy power, re-charging, and re-fueling, needs.

Our County has Five Rail Stations/Solar Plaza Hubs; the Carpinteria Rail; the Santa Barbara Rail; the Goleta Rail; the Lompoc Rail, and the Guadalupe Rail. The Santa Maria Valley Rail would be activated for Passenger Use connecting 101 @ East Jones Street, southeast corner, to the Guadalupe Rail; and the Lompoc Valley Rail would be activated for Passenger Use connecting Highway 246 at Highway 1 to the Lompoc/Surf Rail:

- Carpinteria Rail @ Linden @ 101, Carpinteria
- Santa Barbara Rail @ Lower State Street @ 101, Santa Barbara
- Goleta Rail @ La Patera, @ 101, Goleta
- Lompoc Rail @ 246, Lompoc
- Guadalupe Rail @ 1, Guadalupe

Also, Five Highway 101 Solar Plaza Hubs; 101 @ 154, Santa Barbara; 101 @ 1 @ the Gaviota Pass; 101 @ 246, Buellton; 101 @ 135, Los Alamos; 101 @ E. Jones Street, the existing Santa Maria Valley Rail, Santa Maria:

- 101 @ 154 @ State St., Santa Barbara
- 101 @ 1, Gaviota Pass
- 101 @ 246, Buellton
- 101 @ 135, Los Alamos
- 101 @ SMV Rail, activate for Passenger Use @ E. Jones St. Santa Maria

And, Three Inner Valley Solar Plaza Hubs: Highway 154 @ 246, Santa Ynez River Valley; Highway 1 @ 246, Lompoc Valley, and Highway 33 @ 166, Cuyama:

- 154 @ 246, Santa Ynez Valley
- 1 @ 246, activate Lompoc Valley Rail Passenger Use, Lompoc
- 33 @ 166, Cuyama

UCSB and Vandenberg Air Force Base would each have their own Solar Plaza Hub:

- UCSB: the U-Loop Plaza Hub, Isla Vista
- VAF Base has own Plaza Hub

These Multi-Transport Urban Plaza Hubs would include: Solar Panels facing True South for Maximum Solar Capture; Plug-in Electrics, Parking for Bicycles, etal.; Re-fueling for Hydrogen, Biofuels and so on... and beautiful urban green plaza spaces for on-going community and school annual solar events ...

(\* Please Note: All Solar Panels, Courtyards, Maps, etc., are ideally oriented towards True South, for Maximum Solar Capture -- Northern Hemisphere ...)

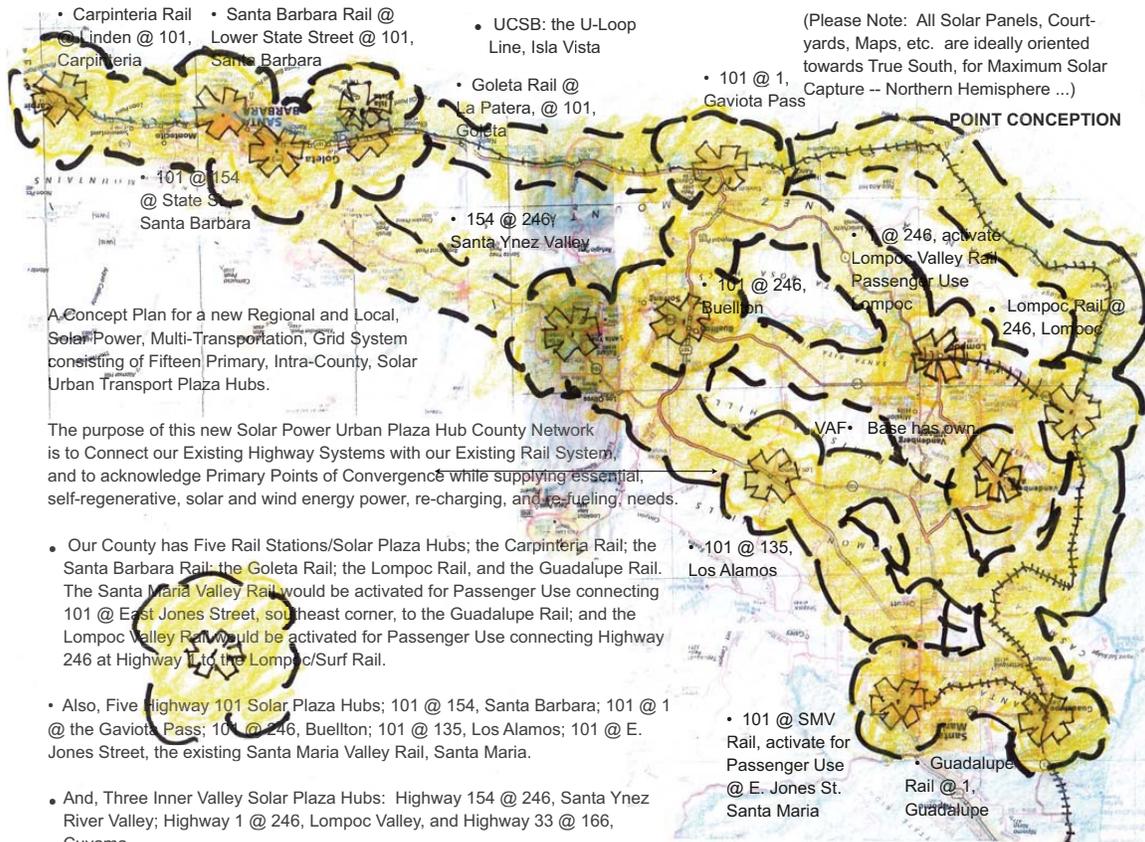
time frame: 2008-30

county: santa barbara county, usa

a regional plan: TRANSPORT

A New, Intra-County, Fifteen Hub, Renewable Energy Transport System.  
[tkcDesigns@Mac.com](mailto:tkcDesigns@Mac.com)/architecture/design&planning • 1.805.705.7940  
pob 31093/SB/CA/93105/USA/planet EARTH revised Sep 02 2008

I.2-1



A Concept Plan for a new Regional and Local, Solar Power, Multi-Transportation, Grid System consisting of Fifteen Primary, Intra-County, Solar Urban Transport Plaza Hubs.

The purpose of this new Solar Power Urban Plaza Hub County Network is to Connect our Existing Highway Systems with our Existing Rail System, and to acknowledge Primary Points of Convergence while supplying essential, self-regenerative, solar and wind energy power, re-charging, and re-fueling, needs.

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# A NEW INTRA-COUNTY MULTI-TRANSPORT SOLAR POWER GRID SYSTEM SANTA BARBARA COUNTY, USA

time frame:

2008-30

county:

SANTA BARBARA COUNTY, USA

a regional plan:

TRANSPORT

A New, Intra-County, Fifteen Hub, Renewable Energy Transport System.  
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 pob 31093/SB/CA/93105/USA/planet EARTH revised Sep 02 2008

*Letter I.2*

**COMMENTER:** Tanne Kiele Chang

**DATE:** September 8, 2008

Response I.2-1

In this Final EIR, detailed responses are not provided to comments on the merits of the proposed project that do not relate to an environmental issue. However, responses to comments on the RTP are addressed by SBCAG staff in Appendix I of the RTP and all comments will be considered by the SBCAG Board. No further response is necessary.

