



May 8, 2015

**CITY COUNCIL**

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**CITY MANAGER**  
Michelle Greene

Jennifer Parson, Senior Environmental Planner  
California Department of General Services  
Real Estate Services Division, Project  
Management and Development Branch  
707 Third Street, 4<sup>th</sup> Floor, MS509  
West Sacramento, CA 95605

**RE: NOTICE OF PREPARATION FOR THE CALIFORNIA HIGHWAY  
PATROL OFFICE REPLACEMENT PROJECT PROPOSED AT  
7780 HOLLISTER AVENUE, GOLETA**

Dear Ms. Parson:

Thank you for the opportunity to comment on the above referenced document. The City of Goleta supports the decision to prepare a full Environmental Impact Report (EIR) in the issue areas as listed within the April 8, 2015 Notice of Preparation (NOP).

Given the proposed location of the new facility, action by the State affects the City, the adjacent neighborhoods, residents, and businesses. Further, access to the existing and proposed CHP facilities occurs exclusively via City streets. As the State proceeds with preparing the Draft EIR, we request that you include a thorough analysis of potential impacts as they relate to the City of Goleta. Our concerns, expressed below, are divided into California Environmental Quality Act (CEQA) issues, Design issues, and Public Improvements.

**A. CEQA**

The City would like the following specific issues to be addressed within the EIR:

1. Air Quality

The associated technical reports from which the Air Quality section of the EIR will be written and the text of the document itself need to

recognize the presence of adjoining sensitive receptors to the site. These sensitive receptors include children attending Ellwood Elementary School (located approximately 400 feet to the east of the site); the approved but not yet constructed Marisposa Assisted Living facility located directly across Viajero Drive; and the adjacent residential neighborhoods of The Hideaway and The Bluffs. All of these uses are within 500 feet of the proposed facility.

## 2. Aesthetics

The City of Goleta is extremely concerned with the appearance of the building and the 148-foot tall antenna structure. It is important that the proposed building and associated site development be designed to reflect the character of the area and be harmonious with the highly attractive and newly constructed adjoining residential neighborhoods (i.e. The Bluffs and The Hideaway etc.). The homes in these neighborhoods are selling between \$900,000 – over \$2.5 million. The siting of the various project components and the architectural design of the new building needs to be high quality (not the standard State non-descript building) so as not to decrease adjacent property and aesthetic values.

Further, the 148-foot tall antenna structure would be the tallest structure within the City and one of the tallest, if not the tallest, structure in the South County area of Santa Barbara County. The EIR must provide a detailed aesthetic analysis of a structure of this height and its compatibility with the surrounding low scale suburban setting. Further, justification for the height of the antenna is critical to the analysis and to the development of alternatives for this project component.

## 3. Biological Resources

The site contains many mature tall trees on site and directly adjacent to the site. These trees may provide nesting and perch sites for raptors. The biological resource section needs to evaluate the project's impact (e.g. construction, on-going operations, lighting, and the effects of the antenna -- EMF, radio and microwave transmissions, etc.) on wildlife. Further, within close proximity to the site are known aggregation and over-wintering roosts for monarch butterflies which are being considered for listing on the Endangered Species List by the United States Fish and Wildlife Service. These specific issues need to be carefully analyzed within the EIR.

## 4. Circulation/Traffic

The City of Goleta standards prohibit direct access onto Hollister Avenue when access is readily available from adjacent lower-volume streets. As Viajero Drive and Las Armas Road flank the site on the east and west respectively, site access must be designed from these streets. In addition to the site access issue, the existing Class 2 bike path on Hollister Avenue, and the infrastructure improvements noted in Items C 1-3 below need to be considered as well. The EIR must analyze the project's impacts with these design considerations in mind.

## 5. Cultural/Historic Resources

The Goleta area, inclusive of the site, was once inhabited extensively by the indigenous Chumash Native Americans. In addition, the historic Barnsdall-Rio Grande gas station is located on the south side of Hollister Avenue approximately 350 feet from the site. The EIR should, at a minimum, include a Phase 1 records search for the site and the nearby area in order to identify potential impacts in this topic area.

## 6. Hazards and Hazardous Materials

Approximately 0.6 miles to the west of the site is located the Venoco Ellwood Onshore Oil and Gas Processing Facility (EOF) at 7979 Hollister Avenue. As outlined in the Safety Element of the City's 2006 General Plan (see pages 5-1 through 5-30), the EOF treats crude oil and gas produced from Platform Holly which is located about 2.5 miles offshore. Processes at the EOF include the separation of oil and water, treatment of oil to reduce hydrogen sulfide ( $H_2S$ ) content, separation and storage of lighter-end hydrocarbons such as liquefied petroleum gas (LPG) and natural gas liquids (NGL), treatment and discharge of produced water, and the conversion of raw sour gas ( $H_2S$ -rich) to sweet sales-grade natural gas (low- $H_2S$ ). Elemental sulfur, a product of the  $H_2S$  removal processes, is also produced at the EOF.

The potential hazardous effects to land uses (including the new CHP office) near the EOF would be from toxicity of a catastrophic  $H_2S$  release from a major plant upset, fires from different hydrocarbon streams released under different scenarios, and explosions from vapor clouds or boiling liquid expanding vapor.  $H_2S$  is a toxic material with the potential to cause human fatalities given sufficient exposure and concentration. As a result of a quantitative risk analysis in 2000, Venoco has implemented a number of risk-reduction measures. However, even with these measures, there is still risk of a catastrophic incident.

With that said, the EIR must examine the risks posed to officers and the safety of the entire community by placing a critical public safety facility within close proximity of the EOF. A copy of the Safety Element of the City's General Plan is enclosed for reference.

## 7. Hydrology/Water Quality

The community has expressed concerns with the proposed placement of fuel tanks and the use of oils/solvents commonly used with automotive maintenance. The EIR needs to provide a detailed description of how the fuel tank will be constructed and monitored for leaks and how solvents/oils etc. used in vehicle maintenance will be stored and disposed of to ensure that no discharge occurs into local water bodies including Devereux Creek and nearby wetlands.

The project needs to evaluate the potential impacts on water quality. Although the site is currently paved, it is also extremely deteriorated to the point of having some level of permeability. The on-site retention basins need to be designed and maintained in conformance with the County of Santa Barbara Project Clean Water Post Construction Requirements based on the 2013 regulations promulgated by the Central Coast

Regional Water Quality Board. These regulations are attached for your reference. The design and impacts from these basins need to be studied and analyzed within the EIR.

#### 8. Land Use

The 2006 Goleta General Plan designated the property at 7780 Hollister Avenue as "General Commercial". The intent was that future uses of this site would provide retail support for the residential uses planned and in existence in the Western area of the City. The idea was to place services closer to residents in order to reduce Vehicle Miles Traveled (VMT) (and the associated Greenhouse Gases (GHG)) and reduce the number of trips passing through the Hollister/Storke intersection to the east. The Hollister/Storke intersection is the most congested intersection within the City of Goleta. The new CHP facility at this location does not achieve this General Plan goal, is inconsistent with the City's General Plan, and consequentially may exacerbate traffic at the impacted Hollister/Storke intersection.

In addition to the loss of land designated for Commercial use to serve the residential neighborhood, the EIR needs to fully analyze the impacts of having an incompatible land use placed within a residential neighborhood. Some of the areas of incompatibility include but are not limited to: noise, lighting, hours of operation, and discordant activities (fuel and fleet maintenance etc.). Residents have strongly expressed compatibility concerns with the presence of the proposed CHP facility in their neighborhood and near Ellwood Elementary School.

Lastly, the resulting change in neighborhood character needs to be studied as well. The character of the area will be altered in an incongruous way never envisioned. This analysis is important so that the full impacts of constructing a State facility in a residential area are disclosed to the decision maker (whoever that unknown CHP official is) and the public.

#### 9. Public Service, Utilities, and Energy

A water supply section needs to be a part of the EIR. This section should include the project-related water supply requirements based on demand factors from the Goleta Water District's most recent Urban Water Management Plan and the drought impacts. Cumulative water supply impacts should also be evaluated based on ongoing development within Goleta Water District's service boundaries.

On April 27, 2015, Goleta Water District (GWD) sent an e-mail to the City indicating that the subject property does not currently have an active water service connection with the District. Further, GWD is not issuing new service connections given the drought. It behooves your organization to contact the Goleta Water District regarding the water needs and availability for the use/site as water is a critical issue to be studied within the EIR. Further, Goleta Water District, as a Responsible Agency, should have received the NOP directly and did not.

#### 10. Noise

The issue of noise impacts needs to be thoroughly analyzed. In particular, noise impacts should be studied from the standpoint of change in character resulting from having a CHP facility where a commercial use was planned. The exposure of residents to sirens and CHP operations was never evaluated in the City's General Plan and associated EIR.

#### 11. Alternatives Section

The alternatives to the development of this site must explore a reasonable range of alternatives including but not limited to: 1) alternative sites not located in an area directly adjacent to existing and approved residential uses (inclusive of an Assisted Living Facility); 2) alternatives to the 148-foot tall antenna; and 3) the reuse of the existing site on Calle Real at an increased intensity and increased building height to accommodate the desired uses within a multi-storied building.

#### 12. Public Notice

The City has received numerous complaints from citizens regarding the lack of notice associated with the distribution of the Notice of Preparation. In addition, the NOP stated that the document was available for review at the Goleta Library and published in the local newspaper. From what staff has determined, neither of these activities happened. Further, the NOP was supposed to be distributed to all Responsible Agencies. It is our understanding that the Goleta Water District (the purveyor of water for the site) did not receive an NOP.

Based on these lapses, the City has grave concerns that appropriate notice will be given when the Draft EIR and Final EIR become available. The City requests that the following occur when the Draft and Final EIRs become available:

- a) Mail written notice to all Responsible Agencies as required by law;
- b) Mail written notice to all property owners and residents within 500 feet of the site;
- c) Mail written notice to all interested parties who have either requested to receive notice and/or provided comments on the NOP and subsequent documents;
- d) Publish a notice in the *Santa Barbara News-Press* at the commencement of both public review periods;
- e) Provide at least three copies of the Draft EIR and Final EIR with appendices in the Goleta Public Library for public review at the commencement of any public review period.

### **B. DESIGN ISSUES**

The City has the following comments that should be taken into account when the specific site and architectural design of the building are developed:

1. Architectural design of the building needs to be of high quality and not the standard non-descript State design. If the State goes forward with siting a facility in this location, then the building design needs to be outstanding and harmonious with the

adjoining residential uses. The design of the new building needs to maintain the character and livability of the existing neighborhoods. Its design needs to fit appropriately within the context of the surrounding area. Further, substantial landscape buffers on all sides need to be designed to reduce the impact of the proposed incompatible CHP use with existing, approved, and planned uses around the site;

2. The truck inspection turnout is at odds with the aesthetics of the area and will be difficult to use given the width of Hollister Avenue and the presence of raised medians. If the truck inspection area has to be provided, then it must be placed at the rear of the site;
3. The antenna must be placed at the rear of the site as far away as possible from existing and approved sensitive uses (residential, assisted living facility, elementary school). The height of the antenna should be reduced to the minimum needed especially given the antenna at the existing facility is at least 100 feet lower in height than that proposed;
4. Recycled/reclaimed water must be used to irrigate any exterior vegetation planned for the site given the drought and good planning sense. Goleta Water District's recycled water line runs directly adjacent to the site in Hollister Avenue;
5. Sidewalks must be provided on all frontages so as to improve the safety of the community and provide connections/ linkage to Ellwood Elementary School;
6. As indicated above, access to the site must be taken from Viajero Drive and/or Las Armas Road as the City does not allow direct access to Hollister Avenue. Further, this portion of Hollister Avenue is a designated Class 2 bike path and the likely presence of bicycles needs to be a design consideration;
7. Utilities needed to serve the site must be placed underground. Further, any utility poles ringing the site must be removed and the utilities on those poles placed underground; and
8. The City would like to review site layout and architectural design of the building. Further, the City requests that any design comments provided be binding given the long-term nature of the facility within our community.

### **C. PUBLIC IMPROVEMENTS**

The City has the following public improvement expectations/issues for this project including:

1. Dedication of right of way to accommodate the existing Viajero Drive cul-de-sac street improvements.
2. Construction of full frontage improvements along Las Armas Road, Hollister Avenue, and Viajero Drive. Said improvements include but are not limited to curb, gutter, parkway and six-foot wide sidewalks to the satisfaction of Goleta's Public Works Director. Please contact Principal Civil Engineer Marti Milan at 805-961-7562 for specifics.
3. Exploration of right of way vacation for Campesino Drive (located along the northern boundary). It is possible that this right of way may no longer be needed. If the CHP wishes to have this right of way vacated, please contact Principal Civil Engineer

Marti Milan at 805-961-7562 to discuss the information needed for the vacation process.

Again, thank you for the opportunity to comment and we look forward to reviewing and providing input on the draft EIR when it becomes available. If there are questions regarding the above or you would like to discuss other issues regarding development within the City, please feel free to contact Lisa Prasse, Current Planning Manager, at 805-961-7542 or [lprasse@cityofgoleta.org](mailto:lprasse@cityofgoleta.org).

Sincerely,



Jennifer Carman, AICP  
Director of Planning and Environmental Review

cc: Goleta City Council  
Planning Commission  
Michelle Greene, City Manager  
Tim Giles, City Attorney  
Valerie Kushnerov, Public Information Officer  
Rosemarie Gaglione, Public Works Director  
Marti Milan, Principal Civil Engineer  
Lisa Prasse, Current Planning Manager

enc: *City of Goleta General Plan – Safety Element*  
*Stormwater Technical Guide for Low Impact Development*