

ATTACHMENT 17.a.i. – RESPONSES TO COUNTY COMMENTS

Draft Airport Land Use Compatibility Plan

1. **Public Agency Consultation.** California Public Utilities Code [Section 21675\(c\)](#) states, "The airport influence area shall be established by the commission [ALUC] after hearing and consultation with the involved agencies." We request that the Santa Barbara County Association of Governments (SBCAG) conduct a formal consultation and a hearing with the County. For example, the [Monterey County ALUC](#) held a separate meeting with affected jurisdictions after it circulated the ALUCP initial study, but before and separate from its adoption hearings. Please provide a timeline that details when and how the County and members of the public may participate in the ALUCP update process.
2. **Project Timeline.** Please provide a clear project timeline. For example, the [Monterey County ALUC](#) is currently updating the ALUCP for the Monterey Regional and Marina Municipal Airports and provides a clear timeline with documents easily accessible to the public and local agencies.

Response: SBCAG staff will be conducting two public workshops to review the Airport Influence Area and ALUCP in general. One workshop will occur at the Santa Maria Airport and workshop will be a virtual / webinar-style format for the smaller general-aviation airports. A formal notice of dates and times will be sent when workshops are set up. A timeline for the project is attached (Attachment 1).

3. **ALUCP and General Plan Consistency.** The County understands the 180-day statutory deadline for local agency general plan consistency after ALUCP adoption (per Government Code Section [65302.3\(b\)-\(c\)](#)). However, Coastal Commission review and certification of Coastal Land Use Plan amendments for the Santa Barbara Airport, which is located in the Coastal Zone, may take a year or longer after the local agency adoption. Therefore, updates to the County's Coastal Land Use Plan cannot meet the 180-day statutory deadline.

Response: Our Caltrans representative has indicated that the local jurisdictions that, for airports located in the coastal zone, the 180-day requirement can be extended due to the requirement for Coastal Commission review and certification. As long as the County can demonstrate progress towards completing the General Plan amendment, the 180-day requirement can be extended.

4. **ALUCP Review prior to Consistency Determination.** The Draft ALUCP does not clearly define which local agency actions are subject to ALUC review prior to a consistency determination (during the 180-day time period). Please describe the land use actions, regulations, projects, and permits that the ALUC must review prior to a consistency determination.

Response: See Policy 2.2.2 b

5. **Density of Uses.** The *California Airport Land Use Planning Handbook* (California Department of Transportation, October 2011) (Caltrans Handbook) recommends compatible ranges of residential and non-residential densities and intensities in each

safety zone. For example, the Caltrans Handbook (Figure 4D) states that in Safety Zone 3, the maximum non-residential intensity should average 100-150 persons per gross acre, with a maximum of 300-450 persons per single acre.

The Draft ALUCP uses the most restrictive (lowest) density and intensity in each safety zone. For example, the Draft ALUCP states that Safety Zone 3 for urban airports has a maximum non-residential intensity of 100 people per acre, or an intensity of 150-200 persons per acre with risk reduction measures. The Draft ALUCP does not explain why SBCAG used the most restrictive densities and intensities. Please explain the rationale for using the lowest density and intensity values, and explain why SBCAG believes the selected values best fit the safety zones.

Response: For the purposes of the ALUCP, SBCAG selected the “floor” and not the “ceiling” densities from the Handbook in order to ensure a smoother transition from the 1993 Airport Land Use Plan restriction for non-residential intensities of 25 people per acre. Furthermore, incorporation of the *Open Land* criteria and *Risk Reduction Features* allows for property owners to incorporate safety features into the project to enhance safety features into the design (such as providing open areas for emergency landings, clustering buildings together to make room for open areas, providing automated sprinkler systems, additional exits, upgraded roof strengths, and/or strengthened concrete or reinforced masonry). Incorporation of these features, dependent upon where the project is located, allows for increased density on the site.

6. **Airport Influence Area (AIA) Policy.** Draft ALUCP Section 3.5.2b)2) states, "ALUC policy is that the disclosure requirements shall apply within the AIA (Review Area 1 and Review Area 2)." Please provide the exact ALUCP policy citation or text, for reference.

Response: The geographic scope of the ALUCP is delineated through the AIA and is discussed in additional detail in Section 2.4 of the ALUCP. The plans were revised to include a citation to Section 2.4 in this section.

7. **Lompoc Airport.** The following two comments refer to the Lompoc Airport discussion in Chapter 4 of the Draft ALUCP.

- a. Section 4.2.2. The text states that the Runway 25 displaced threshold may be incorrectly located and "not necessary." Was the displaced threshold used to form the safety zone compatibility map? Since Appendix A (Airports Background Data) is not available on SBCAG's website, we are unable to view the Lompoc Airport Layout Plan (ALP) and understand adjustments made to the Lompoc Airport safety zones.

Response: There is no displaced threshold at Lompoc Airport on Runway 25 and it was not used to form the safety zones for the Airport. The reference was removed from Section 4.2.2 to eliminate confusion.

- b. Figure 4-5. It appears that the Review Area 1 and Review Area 2 colors in the legend are labeled incorrectly, as Review Area 1 should be closer to the airport and Review Area 2 should be the external boundary.

Response: The figure was updated in the Lompoc Draft ALUCP.

8. **New Cuyama Airport.** Please explain why SBCAG applied the generic safety compatibility factors for the Lompoc Airport to the New Cuyama Airport (per Draft ALUCP Section 5.2).

Response: The typographical error results in a misunderstanding of how the safety compatibility factors were developed for New Cuyama Airport. As noted in Section 5.2.2, the safety zones were developed based on the generic zones shown in the California Airport Land Use Planning Handbook example for "Low Activity General Aviation Runway". Section 5.2 will be revised to indicate:

The generic safety compatibility factor for ~~Lompoc Airport~~ New Cuyama Airport was chosen based on details describing New Cuyama Airport's physical characteristics and reported operational activity.

9. **Santa Barbara Municipal Airport.** Please provide Appendix A so we can fully understand the formatting of the eastern boundary of AIA Review Area 2.

Response: Implementation of the Santa Barbara Airport ALUCP has been delayed, however, the operational assumptions data for SBA can be provided upon request.

Environmental Review

1. **Initial Study Checklist.** The Initial Study did not use the current (2019) version of the CEQA Guidelines Appendix G, Environmental Checklist Form. SBCAG may wish to revise the Initial Study using the current form.

Response: SBCAG confirmed that the Initial Study Checklist used for this project is the most current version available as that contained in Appendix G of the CEQA Guidelines (2019).

2. **Scope of Environmental Review.** The following three comments identify additional information that SBCAG should include in the Initial Study. The additional information is needed to ensure that the environmental review is complete, comprehensive, and can be relied upon by the County in its role as a responsible agency.
 - A. Difference between 1993 Airport Land Use Plan (ALUP) and 2019 Draft ALUCP. SBCAG, as the lead agency under CEQA, has a responsibility to identify the differences between the adopted 1993 ALUP and the proposed May 2019 Draft ALUCP. For example, the Initial Study should evaluate changes between the existing ALUP and the Draft ALUCP, particularly in regard to changes in the airport safety compatibility zones.
 - B. Increased Development Potential. Changes in the airport safety compatibility zones between the ALUP and Draft ALUCP may result in the potential for increased development via the relaxation of airport safety compatibility restrictions in some locations. The Initial Study needs to consider the opportunity for increased development, or "growth," due to changes in the safety compatibility zones. The Initial Study should examine potential growth on vacant parcels, as well as the potential for redevelopment to a more intensive use on currently underdeveloped parcels.

Please identify areas where the changes would allow increased development, and then identify and analyze the development's potential effects on the environment.

For example, in the southeastern end of Runway 12-30 at the Santa Maria Public Airport (SMX), the new safety zones in the Draft ALUCP would replace the No-Build Corridor and Approach Zone in the 1993 ALUP. This change would result in parcels with fewer development restrictions and, therefore, may result in growth-inducing effects which require environmental review. To help illustrate this issue, we have compiled maps and analysis of assessor's parcel 107-250-022 (attached) that show changes in the existing airport safety zones at SMX that the Initial Study has not analyzed. Please include a similar mapping analysis in the Initial Study for all airports. Please also assess the potential for increased development within the Initial Study or resulting CEQA document.

Response: See Section 15a (Population and Housing) and Appendix E (Analysis of Potential Growth Inducing Effects) of the Initial Study.

3. **Level of Environmental Review.** We respectfully request that SBCAG wait to determine the appropriate level of environmental review (e.g., negative declaration, mitigated negative declaration, or environmental impact report) until after the Draft Initial Study has been finalized and released to the public for review.

Response: Comment noted

4. **Southern California Gas (SoCalGas) La Goleta Gas Property.** We understand that the displacement analysis considered the SoCalGas La Goleta gas field property and facilities to be "vacant." In fact, SoCalGas has actively used the property for natural gas storage for many years. We request that the SoCalGas property not be considered as "vacant" lands for purposes of the Santa Barbara Airport displacement analysis.

Response: The SoCalGas parcels have been removed from the displacement analysis for the public draft Initial Study and, for the purposes of the environmental document, are considered an existing land use.

5. **Entitled Projects and Cumulative Projects Lists.** SBCAG and its consultant ESA list "entitled projects" surrounding each airport in the Draft Displacement Analysis documents (Appendix B to the Draft Initial Study). ESA reviewed some of the "entitled projects" lists updates recently (e.g., SMX list was reviewed in March 2019), but ESA last reviewed other lists six or more months ago. We suggest that ESA or SBCAG review the entitled projects lists for updates for all airports.

Additionally, please consider approved, in progress, and reasonably foreseeable Santa Barbara County Long Range Planning Division projects in the cumulative projects analysis portion of the environmental document.

Response: We would need updated cumulative project lists from the County staff to update the Initial Study and displacement analysis accordingly. Any data we receive can be incorporated into the Final document.