

Appendix B

Final EIR Comments and Responses

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 Supplemental Environmental Impact Report (DSEIR) for the Fast Forward 2040 Regional Transportation Plan – Sustainable Communities Strategy (Fast Forward 2040) SEIR and has prepared written responses to the written comments received. No verbal comments were received. The DEIR was circulated for a 45-day public review period that began May 29, 2013 and concluded on July 12, 2013. The comment letters included herein were submitted by public agencies, private organizations/private citizens. No verbal comments were received at the SBCAG Public Hearing on the Draft SEIR on May 4, 2017.

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 commenters and to indicate where and how the EIR addresses pertinent environmental issues.

The DSEIR and this Comments and Responses document collectively comprise the Final EIR for the Fast Forward 2040 RTP-SCS SEIR. Any changes made to the text of the DSEIR correcting information, data or intent, other than minor typographical corrections or minor working changes, are noted in the Final SEIR as changes from the DSEIR.

The comment letters have been numbered sequentially, and each issue within a comment letter, if more than one, has a number assigned to it. Each comment letter is reproduced in its entirety with the issues of concern numbered in the left margin or identified by the numbering in the letter with a red box added to identify the number. References to the responses to comments identify first the letter number, and second, the lettered number. Letters are identified by an abbreviation of the organization’s name, followed by a number if more than one comment letter was sent by the organization (CAB#1, for example, would reference the first letter received from Cars Are Basic).

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.

RESPONSES TO COMMENTS ON THE DRAFT EIR

Commenters on the Draft EIR include public agencies and private entities (refer to Table below). No verbal environmental comments were received at the Fast Forward 2040 RTP-SCS Draft EIR Public Hearing of May 4, 2017 held at the SBCAG offices.

Letter Key	From	Date Received
CAB1	Cars Are Basic/Thomas Becker	3/31/2017
CAB2	Cars Are Basic/Thomas Becker	4/4/2017
CAB3	Cars Are Basic/Thomas Becker	4/30/2017
CAB4	Cars Are Basic/Thomas Becker	5/29/2017
APCD	Santa Barbara County Air Pollution Control District	5/31/2017
CC	California Coastal Commission, South Coast District Office	5/31/2017

Public comments on the draft Fast Forward 2040 will be accepted up until Board adoption and will be included in the record and addressed as necessary in the final RTP-SCS. Public comments on the draft SEIR will be accepted until the end of the 45-day public comment period and responded to in the final SEIR. There will be opportunity for public comment during all advisory committee and Board meetings where Fast Forward 2040 and the SEIR are considered.

Please let me know if you have any additional questions.

Regards,

Mike Becker

mbecker@sbcag.org / 961-8912

----- Original message -----

From: Thomas Becker <lesdeplorable7@gmail.com>

Date: 3/31/17 8:41 AM (GMT-08:00)

To: Peter Imhof <PImhof@sbcag.org>

Subject: Fast forward 2040

Letter # CAB1

Peter,

1 Cars Are Basic (CAB) attended the Fast Forward 2040 SEIR scoping meeting in December. We submitted oral and written comments. This coming Thursday, SBCAG will be submitting the complete Fast Forward 2040 draft update to JTAC. CAB would like to know when the draft SEIR is going to be released. Is the SEIR going to be attached at some point to the full Fast Forward update document?

2 Also, when are public comments due on the draft Fast Forward 2040 update? Will public comments be →
3 included in the final Fast Forward 2040 update document? Will SBCAG staff provide responses to public
4 comments that are submitted for the Fast Forward 2040 update?

Your prompt response to our questions is respectfully requested.

Thank you,

Tom Becker

Cars Are Basic

lesdeplorable7@gmail.com

Letter # CAB1 Responses

1. The Fast Forward 2040 Draft Supplemental Programmatic Environmental Impact Report (DSEIR) was released for public review on April 17, 2017, for a 45-day review that ended on May 31, 2017. The DSEIR will not be bound with the Fast Forward 2040 RTP-SCS (Fast Forward 2040) document as they are separate documents. The SEIR is an informational document for use by SBCAG, other agencies, and the general public in their consideration and evaluation of the environmental consequences of implementing the proposed Fast Forward 2040.
2. The public comments on the draft Fast Forward 2040 update were due on July 7, 2017.
3. Public comments and responses to the Fast Forward 2040 update are included in an appendix that is considered a part of the document [SBCAG staff to verify].
4. SBCAG will provide responses to public comments on the Fast Forward 2040. See response to comment 3 above [SBCAG staff to verify].

Letter # CAB2

April 4, 2017

To: JTAC

From: Cars Are Basic

Subject: Agenda Item 4

Cars Are Basic (CAB) has been involved with the Fast Forward 2040 update for the past 5 months. We have submitted written and oral comments to SBCAG staff.

- 1 CAB believes that public comments submitted to SBCAG should be treated with the same level of care and attention that SBCAG staff gives to their own comments and ideas. Sadly, SBCAG staff, as well as other government entities, have demonstrated a genuine lack of respect towards public comments, ideas and suggestions.
- 2 CAB believes that all comments received by SBCAG concerning the Fast Forward 2040 update should be included in the body of the draft document. At this time, SBCAG staff is planning to exclude public comments from the draft document. This attitude towards the comments and ideas of the people is demonstrative of the general attitude of SBCAG staff and the SBCAG Board. CAB will be submitting comments on the update plan by May 1. We request that staff respond point by point to our comments and questions and that our comments and questions, as well as staff's reply, be included in the main body of the draft update (not the appendix) that is scheduled to be submitted to the SBCAG Board on May 18.
- 3 The Fast Forward 2040 plan will be used as a supporting document in federal grant applications. Be aware the CAB fully supports the agenda and policies of President Trump. If the Fast Forward 2040 plan contains policies that conflict with President Trump's agenda and policies, CAB is fully prepared to file protests against any and all federal grant applications that use the Fast Forward 2040 plan as a supporting document.
- 4

Letter # CAB2 Responses

1. All comments received on the Draft SEIR have been reviewed and responded to by SBCAG as required by CEQA.
2. Comments received by SBCAG on the Fast Forward 2040 update are easily accessible in Fast Forward 2040 Appendix 6. These comments and responses are at this link:
http://www.sbcag.org/uploads/2/4/5/4/24540302/ff2040_draft_appendices.pdf
3. SBCAG has responded to all Fast Forward 2040 comments. The responses can be found at the link above. SBCAG staff included all comments and responses in Fast Forward 2040 Appendix 6.
4. SBCAG recognizes CAB's right to file protests against federal grant applications that use the Fast Forward 2040 plan as a supporting document.

Letter # CAB3

Michael D. Becker

From: Thomas Becker <lesdeplorable7@gmail.com>
Sent: Sunday, April 30, 2017 2:03 PM
To: Michael D. Becker; Marjie Kirn; Gregg Hart; michael.morris@dot.gov; tashia.clemons@dot.gov
Subject: CAB Public Comments on Fast Forward 2040 Regional Transportation Plan Draft Document, submitted April 30, 2017.

Cars Are Basic (CAB) is submitting comments on the PROPOSED Fast Forward 2040 RTP update draft document.

- 1- CAB has informed SBCAG Staff that it is our position that public comments on the PROPOSED draft update that are received by staff by May 1, should be included in the draft document. We also believe that public comments should be placed in the main body of the document, and not in an appendix. SBCAG should give EQUAL treatment to the positions, comments and ideas of the public as compared to staff's. SBCAG staff has informed CAB that public comments on the PROPOSED draft are not even going to be placed in any section of the draft document.
- 2- CAB believes that SBCAG staff should fully respond to ALL public comments received by staff by May 1; that staff's responses should be included in the draft document; and staff responses should be placed in the main body of the draft document, and not in an appendix.
- 3- CAB was informed by SBCAG staff that all public comments received by May 1 will be reviewed by staff before the final draft document is completed. This gives staff ample time to respond to public comments on the PROPOSED draft document, and gives staff ample time to place public comments and staff responses in the main body of the draft document.
- 4- The Fast Forward 2040 document will be used as a supporting document when SBCAG applies for federal grants, federal money, or other federal subsidies. It is therefore incumbent upon SBCAG to respond to public concerns about how SBCAG is administering the use and allocation of federal money, and respond to public concerns when SBCAG staff and board attempt to thwart federal government policies; misappropriate federal tax dollars; or engage in attempts to deceive federal agencies to the true costs and effectiveness of SBCAG projects; or do not take necessary steps to stop improper government/contractor activities associated with federally funded projects.
- 5- Since the Fast Forward 2040 is used as a supporting document for federal fund requests, the document should fully conform with the agenda and policies of the various agencies and departments of the federal government.
- 6- Donald Trump is President of the United States. His administration controls the various agencies and departments of the federal government.
- 7- President Trump has set forth a policy that all federally funded infrastructure projects must demonstrate their ability to create jobs or support the creation of jobs, as well as their cost-effectiveness.
- 8- President Trump has indicated that all infrastructure projects seeking federal funding will be graded on their ability to create jobs, including their ability to create permanent employment.

- 9- Oil and gas pipelines are considered part of the nation's transportation infrastructure.
- 10- President Trump has signed an executive order calling for a review of offshore oil and gas development in federal waters.
- 11- The Fast Forward 2040 PROPOSED draft does not address the possibility of improving infrastructure that supports the oil and gas industry in Santa Barbara County.
- 12- SBCAG is not prohibited from studying how to improve and expand oil and gas infrastructure as part of the Fast Forward 2040 document.
- 13- Members of SBCAG staff have publicly misrepresented President Trump's policies during their duties of employment with SBCAG.
- 14- Some members of SBCAG staff use their influence as SBCAG employees/government employees to engage in activities that attempt to thwart the infrastructure and energy policies of the Trump Administration. Those SBCAG employees are exerting tremendous influence on the process of developing the Fast Forward 2040 document, as well as other SBCAG planning documents.
- 15- The PROPOSED draft document does not contain any section showing the number of persons living in poverty in Santa Barbara County, and how the poverty rate has changed over the last 30 years.
- 16- The PROPOSED draft document does not contain any section showing home ownership rates in Santa Barbara County, and how home ownership rates have changed over the last 30 years.
- 17- The PROPOSED draft document does not show how alternative transportation projects (i.e. bike lanes, bus service) have affected poverty rates or home ownership rates in Santa Barbara County over the last 30 years.
- 18- The PROPOSED draft document does not have any estimate showing reductions in poverty or increases in home ownership rates brought about by the introduction of alternative transportation projects. Any such projections MUST be based on data gathered over the last several decades, and not on estimates with no basis from past performance.
- 19- The PROPOSED draft document does not contain any information showing how any transportation project, planning policy, housing policy, or other ideas put forth in the Fast Forward 2040 document, will reduce poverty rates and increase home ownership rates.
- 20- The PROPOSED document does not show how many people are employed in the motor vehicle related industry/business sector in Santa Barbara County. It does not show how many people are employed in the bicycle related business/industry sector. It does not show how many people are employed by government controlled bus transportation agencies. The impact on employment from motor vehicle related business compared to alternative transportation related businesses should be studied.
- 21- The PROPOSED document does not study the effect government employee commuting has on roadway and intersection Level Of Service, especially the LOS on Highway 101 through the HOV project area, and LOS at the intersection of Olive Mill/Coast Village Road, San Ysidro/Highway101, and other intersections/roadways impacted by the HOV project.

22- The PROPOSED document does not study the effect high density housing projects have on roadway/intersection LOS. It also does not show how local and state housing and development policies cause commuters to live long distances from their places of employment.

23- The PROPOSED document does not study how state and local government approval/support for high density housing projects impacts poverty rates and home ownership rates.

24- The PROPOSED document does not study the potential income to the county from oil and gas royalties that may increase from expanded federal offshore oil development. The discussion should show how the county's need for federal grants and other federal funding could be reduced by increasing federal offshore oil royalty income.

CAB has submitted 24 points to SBCAG staff in this letter. We expect SBCAG staff to respond in detail to each point. We request our comments and staff's responses to be included in the Fast Forward 2040 draft document.

Thank You,

Tom Becker
Cars Are Basic
lesdeplorable7@gmail.com

Letter # CAB3 Responses

1. Comments received by SBCAG on the Fast Forward 2040 update are easily accessible in Appendix 6. These comments and responses are at this link:
http://www.sbcag.org/uploads/2/4/5/4/24540302/ff2040_draft_appendices.pdf
2. SBCAG staff will respond to all Fast Forward 2040 comments following the July 7, 2017 close of the public comment period and has responded to all SEIR comments included as part of this Final SEIR per CEQA Statute and Guidelines.
3. Refer to Response 1.
4. Fast Forward 2040 will be used as a supporting document for federal funding of individual transportation improvement projects. In accordance with CEQA, the Final SEIR includes responses to comments on both the Draft SEIR and Fast Forward 2040.
5. through 8. SBCAG follows FHWA, FTA, and Caltrans' guidance in the preparation of the RTP-SCS.
9. Through 12. The SEIR only addresses transportation projects listed in the Fast Forward 2040 RTP. Oil and gas pipelines are not included in the Fast Forward 2040 RTP.

13. through 14. The SEIR, per the State CEQA Guidelines, discloses the potential environmental impacts from the construction and operation of the projects listed in Fast Forward 2040.
15. through 20. The Draft SEIR, section 4.16 Environmental Justice (pg. 173-190) analyzes the impacts of Fast Forward 2040 on low-income populations, minority individuals and populations, and low mobility populations. Table 17, page 176, lists the poverty rate for Santa Barbara County, and the cities and communities within Santa Barbara County. As described in State CEQA Guidelines Section 15131, "Economic or social effects of a project shall not be treated as significant effects on the environment."
21. CEQA does not require an analysis of government employee commuting on Level of Service (LOS). An analysis of transportation impacts can be found in Section 4.12 *Transportation and Circulation* starting on page 261 of the Draft SEIR. Due to the programmatic nature of the RTP, transportation performance measures were aggregated to evaluate the overall performance of the region's transportation system using the metrics of volume-to-capacity ratio (V/C) and Congested Vehicle Miles Travelled (CVMT).
22. Draft SEIR Section 4.12 *Transportation and Circulation* assesses the transportation impacts of Fast Forward 2040, including land use patterns under the SCS. The Draft SEIR *Alternatives* Section compares impacts from the different SCS land use scenarios. Table 47 shows this comparison. Local and state housing development policies are not within the scope of this project, and therefore are not addressed in the SEIR.
23. Local and state housing development policies are not within the scope of this project, and therefore are not addressed in the SEIR.
24. Oil and gas royalty policies are not within the scope of this project, and therefore are not addressed in the SEIR.

Letter # CAB4

To: SBCAG

From: Cars Are Basic

Subject: Fast Forward 2040 Draft EIR comments/questions

Date: 5/29/17

Cars Are Basic (CAB) is submitting the following comments and questions to be reviewed and responded to, as part of the Fast Forward 2040 RTP Draft EIR. We request SBCAG staff respond point by point to each of our enumerated comments/questions. The Fast Forward 2040 document is the “master plan” for Santa Barbara County transportation planning. It is also the “master” supporting document when SBCAG applies to the federal government for federal funding. CAB’s comments and questions are primarily intended to obtain SBCAG’s position on current federal transportation and infrastructure agendas, plans and objectives. CAB will review SBCAG’s answers and comments with the intention of determining if SBCAG is conforming with the agenda of the current federal government executive branch administration. With CAB’s intention in mind, SBCAG staff should answer or respond to CAB’s enumerated points IN DETAIL, leaving no doubt as to SBCAG’s position on federal government planning, objectives and agendas.

- 1) SBCAG is responsible for reviewing, creating and processing funding for transportation projects throughout Santa Barbara County.
- 2) SBCAG is responsible for reviewing, creating and approving requests for federal government funding of transportation projects throughout Santa Barbara County.
- 3) President Trump heads the executive branch of the federal government.
- 4) The Department of Transportation, the Department of Energy and the Department of the Interior, are all administered by the executive branch of the federal government.
- 5) As part of his agenda, President Trump has asserted that all federally funded transportation and infrastructure projects must be cost effective, and must be planned and designed to be as low cost as possible.
- 6) Does SBCAG staff support President Trump’s agenda as outlined in point #5?

Questions/comments #7 - #33 are directly related to the issue of Environmental Justice, which must be addressed as part of this EIR.

- 7) As part of his agenda, President Trump has asserted that all federally funded transportation and infrastructure projects, must demonstrate their ability to create and/or support employment opportunity, both short term and long term, for all U.S. citizens and legal alien residents. This includes members of minority groups.
- 8) Does SBCAG staff support President Trump’s agenda as outlined in point #7?
- 9) President Trump has asserted that his infrastructure and energy agendas, are intended to create jobs and equal opportunity for all U.S citizens and legal alien residents, including members of minority groups.

- 10) Does SBCAG staff have ANY reason to believe President Trump's infrastructure and energy agenda will harm equal opportunity for minority groups who are U.S citizens or legal alien residents? If yes, please explain.
- 11) How many members of minority groups living in Santa Barbara County, as a percentage of the total minority group county population, currently live at or below the poverty level?
- 12) How many members of minority groups in Santa Barbara County, as a percentage of the total minority group county population, lived at or below the poverty level in the year 2000? The year 2005? The year 2010?
- 13) Based upon the answers to questions #11 and #12, compare the current increase or decrease in the county poverty rate for minority groups to years 2000, 2005 and 2010.
- 14) As part of his agenda, President Trump is prioritizing the use of federal funding for projects that will support increased opportunity for home ownership, including homeownership for minority groups.
- 15) Does SBCAG staff support President Trump's agenda as outlined in point #14?
- 16) What is the current homeownership rate for minority groups in Santa Barbara County?
- 17) What was the homeownership rates for minority groups in Santa Barbara County in year 2000? Year 2005? Year 2010?
- 18) Based upon the answers to questions #16 and #17, compare the current homeownership rates for minority groups in Santa Barbara County to years 2000, 2005 and 2010.
- 19) With the implementation of the Fast Forward 2040 plan, as well as other local planning documents, what is the projected poverty rate for minority groups in Santa Barbara County in year 2027? Year 2040?
- 20) With the implementation of the Fast Forward 2040 plan, as well as other local planning documents, what is the projected minority group homeownership rate in Santa Barbara County in year 2027? Year 2040?
- 21) What is the current poverty rate for minority groups in the City of Santa Barbara?
- 22) Based upon the implementation of the Fast Forward 2040 plan, as well as current/proposed City of Santa Barbara planning documents, what is the projected minority group poverty rate in the City of Santa Barbara for year 2027? 2040?
- 23) What is the current minority group homeownership rate for the City of Santa Barbara?
- 24) With the implementation of the Fast Forward 2040 plan, as well and current/proposed City of Santa Barbara planning documents, what is the projected minority group homeownership rate for the City of Santa Barbara in year 2027? Year 2040?
- 25) In regards to minority group poverty rates: Please detail the new poverty rate- reducing ideas and plans, contained in the Draft Fast Forward 2040 plan that were not contained in SBCAG planning documents in years 2000, 2005 and 2010.
- 26) In regards to minority group homeownership rates: Please detail the new homeownership rate-increasing ideas, contained in the Draft Fast Forward 2040 plan, that were not contained in SBCAG planning documents in years 2000, 2005 and 2010.
- 27) In regards to minority group poverty rates in the City of Santa Barbara: Please detail the new poverty rate- reducing ideas contained in the Fast Forward 2040 plan and current/proposed City of Santa Barbara planning documents, that were not contained in SBCAG and City of Santa Barbara planning documents in years 2000, 2005 and 2010.

- 28) In regards to minority group homeownership rates in the City of Santa Barbara: Please detail the new homeownership rate-increasing ideas contained in the Fast Forward 2040 plan, and current/proposed City of Santa Barbara planning documents, that were not contained in SBCAG and City of Santa Barbara planning documents in years 2000, 2005 and 2010.
- 29) How many members of minority groups are employed by companies that are primarily automotive related businesses in Santa Barbara County? This would include automotive repair, parts manufacturing and sales, new and used vehicle sales, fuel sales, commercial vehicle drivers, delivery drivers and cleaning services.
- 30) How many members of minority groups are employed by companies that are primarily oil and gas production related industries in Santa Barbara County?
- 31) How many members of minority groups are employed by companies that are primarily bicycle related businesses?
- 32) Based upon current City of Santa Barbara and SBCAG planning documents (housing and transportation documents), how many members of minority groups will obtain first time homeownership in the City of Santa Barbara over the next 23 years (between 2017 and 2040)?
- 33) Based upon proposed City of Santa Barbara and SBCAG planning documents (housing and transportation documents), how many members of minority groups will obtain first time homeownership in the City of Santa Barbara over the next 23 years (between 2017 and 2040)?
- 34) How many for-ownership housing units does the City of Santa Barbara plan to build in the city over the next 23 years (between 2017 and 2040)?
- 35) How many peak rush- hour commuters currently driving on the Highway 101 through the HOV project segment (Phase 4), are government employees (cities, county and state)?
- 36) How many peak rush- hour commuters currently driving on Highway 101 through the HOV project segment (Phase 4), will move to the City of Santa Barbara as a result of the implementation of current and proposed City/ SBCAG housing and transportation planning documents? Estimate the number over the next 23 years (between 2017 and 2040).
- 37) Does SBCAG Staff support the study of ideas that may reduce the number of commuters on Highway 101 through the HOV (Phase 4) project area, as an alternative to constructing a third lane to improve LOS?
- 38) Would SBCAG staff prefer improving the LOS on Highway 101 by reducing the number of motor vehicles versus constructing a third lane?
- 39) How many peak rush- hour motor vehicle trips would have to be eliminated on Highway 101, through the proposed HOV project area, to achieve the same improvement in LOS as constructing a third lane?
- 40) Has SBCAG Staff discussed with Caltrans the public comments Caltrans has received for the Highway 101 HOV project Revised EIR?
- 41) Which would be the most environmentally preferred way to improve LOS on Highway 101 through the HOV (phase 4) project area: constructing a third lane, or reducing the number of vehicle trips using good land use and housing planning?
- 42) In terms of costs to federal taxpayers, which plan for Highway 101 would be the least costly: Constructing a third lane, or building housing in Santa Barbara, Goleta and the unincorporated areas of South Santa Barbara County, so people currently commuting on Highway 101 through the HOV project area can move to where their jobs are?

Questions #43 - #50 are directly related to the issue of Environmental Justice, which is an issue that must be addressed in this EIR.

- 43) How many members of minority groups living in Santa Barbara County will be lifted out of poverty, as a result of completion of the Highway 101 Phase 4 project?
- 44) How many members of minority groups living in Santa Barbara County will become homeowners, as a result of completion of the Highway 101 Phase 4 project?
- 45) Are oil pipelines considered part of the nation's transportation infrastructure system?
- 46) How many members of minority groups living in Santa Barbara County would be lifted out of poverty, if oil production was increased to 500,000 barrels a day (total onshore and offshore of Santa Barbara County)?
- 47) How many members of minority groups living in Santa Barbara County would become homeowners, if oil production was increased to 500,000 a day (total onshore and offshore of Santa Barbara County)?
- 48) In terms of cost effectiveness, which would be a better investment of federal tax dollars for the purpose of reducing poverty and increasing homeownership rates, for minority groups living in Santa Barbara County: Investing \$250 million in the Highway 101 Phase 4 Project, or investing \$250 million in improving, expanding and modernizing oil production facilities that are used to produce oil located offshore in federal waters?
- 49) If oil production onshore and offshore of Santa Barbara County was increased to 500,000 barrels a day, what would be the estimated yearly tax and royalty income to the State of California and the County of Santa Barbara?
- 50) In a general sense, would members of minority groups benefit from increased oil tax and royalty revenues to the state and the county?

Cars Are Basic has been involved in the Fast Forward 2040 update for over a year. We have submitted comments on the EIR update, as well as the Fast Forward 2040 planning document. We have observed that SBCAG staff and board have shown a distinct lack of interest in improving employment opportunities for people who are members of minority groups. We have structured our comments and questions in this letter to jolt SBCAG staff into finally addressing the issues listed above.

Cars Are Basic
lesdeplorable7@gmail.com

Letter # CAB4 Responses

1. and 2. SBCAG does not have discretion over all transportation projects in Santa Barbara County. With the exception of prioritizing STIP funding, SBCAG serves primarily as an administrator for transportation funding and with the exception of several grant programs, such as the TIGER program, the State of California is responsible for distributing federal transportation funds, not SBCAG
3. through 10. It is acknowledged that in 2017, Donald Trump is the President of the United States and in charge of the Executive Branch of the Federal government. The Draft SEIR assesses environmental impacts as required under the CEQA Guidelines. Specific agendas, including that of the President of the United States, are not relevant or influential to the SEIR analysis. The Draft SEIR, section 4.16 Environmental Justice (pg. 173-190) analyzes the impacts of Fast Forward 2040 on low-income populations, minority individuals and populations, and low mobility populations.
11. through 34. SEIR Section 4.16 Environmental Justice (pg. 173-190) analyzes the impacts of Fast Forward 2040 on low-income populations, minority individuals and populations, and low mobility populations. The SEIR addresses impacts from all transportation projects included in Fast Forward 2040. The comment does not raise an issue that is relevant to the environmental analysis of the project.
35. CEQA does not require an analysis of government employee peak hour commuting. An analysis of transportation impacts can be found in Section 4.12 *Transportation and Circulation* starting on page 261 of the Draft SEIR. Due to the programmatic nature of the RTP, transportation performance measures were aggregated to evaluate the overall performance of the region's transportation system using a volume-to-capacity ratio (V/C) and Congested Vehicle Miles Travelled (CVMT).
36. Due to the programmatic nature of the RTP, transportation performance measures were aggregated to evaluate the overall performance of the region's transportation system using the metrics of volume-to-capacity ratio (V/C) and Congested Vehicle Miles Travelled (CVMT). Specific impacts related to the HOV 101 project are addressed in the environmental documentation for that project.
37. See response to Comment # 36 above.
38. See response to Comment # 36 above
39. See response to Comment # 36 above
40. See response to Comment # 36 above
41. See response to Comment # 36 above
42. See response to Comment # 36 above
43. See response to Comment # 36 above
44. See response to Comment # 36 above
45. The SEIR addresses the transportation projects listed in Fast Forward 2040 RTP and its associated Sustainable Communities Strategy. Oil and gas pipelines are not a part of the Fast Forward 2040 RTP.
46. This question is outside the scope of this project. Also, see response to Comment # 45 above.

47. See response to Comment # 46 above
48. See response to Comment # 36 above
49. See response to Comment # 46 above
50. See response to Comment # 46 above



**Santa Barbara County
Air Pollution Control District**

May 31, 2017

Peter Imhof
Santa Barbara County Association of Governments
260 North San Antonio Road, Suite B
Santa Barbara, CA 93110

Re: APCD Comments Regarding the Supplemental Environmental Impact Report for Fast Forward 2040

Dear Mr. Imhof,

1

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Supplemental Environmental Impact Report (SEIR) for *Fast Forward 2040*, the update of SBCAG's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The RTP will update the County's goals and policies for meeting current and future mobility needs and identify programs, actions, and a revised plan of projects intended to address these needs consistent with adopted goals and policies. The SCS will demonstrate how greenhouse gas (GHG) reduction targets will be met through integrated land use, housing, and transportation planning. The SEIR will supplement the Program EIR for the 2040 RTP-SCS, which was certified in August 2013. The APCD will utilize the Transportation Control Measures (TCMs) in the RTP and their related environmental analysis in future Ozone Plans.

2

Currently, Santa Barbara County's air quality does not meet California standards for ozone or PM₁₀. Road dust and vehicle emissions contribute to air pollution in the county. To the extent that measures in the RTP/SCS reduce vehicle miles traveled in the county, increase transit accessibility, support the adoption of zero emission vehicles, and support the use of alternative transportation, they can support improvements in regional air quality and reduce greenhouse gas emissions.

3

The SEIR identifies measures to mitigate impacts from construction activities and localized exposures to hazardous air pollutants and odorous compounds. Because this program EIR may be relied on for subsequent activities, it is important that the mitigation measures be implemented when the projects identified in this EIR are implemented. Lead agencies for the individual projects identified within the EIR should ensure that the mitigation measures are enforced as conditions of approval for the individual projects.

Aeron Arlin Genet • Air Pollution Control Officer

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OurAir.org • twitter.com/OurAirSBC

If you have any questions, please feel free to contact me at (805) 961-8879 or via email at cbe@sbcapcd.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Ellenberger', with a long horizontal flourish extending to the right.

Ben Ellenberger,
Manager
Technology and Environmental Assessment Division

Letter # APCD Responses

1. The issues raised by the commenter have been discussed in the SEIR.
2. The comment regarding plan components that reduce air contaminant and greenhouse gas emissions are noted. Air quality and greenhouse gas emissions impacts are assessed in the SEIR.
3. The SEIR mitigation measures are intended to be utilized by the sponsors of individual projects as they are implemented.

CALIFORNIA COASTAL COMMISSION

South Coast District Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071

Letter # CC



May 31, 2017

Peter Imhof
Deputy Executive Director, Planning
Santa Barbara County Association of Governments
260 North San Antonio Road, Suite B
Santa Barbara, CA 93110

RE: Update to Fast Forward 2040, Regional Transportation Plan and Sustainable Community Strategy, Comments on Draft Supplemental Environmental Impact Report (SCH # 2012091050)

Dear Mr. Imhof:

Coastal Commission staff appreciates the invitation to participate in the environmental review process for the Fast Forward 2040: Regional Transportation Plan and Sustainable Communities Strategy. We have reviewed the Fast Forward 2040 Draft Chapters and the Draft Supplemental Environmental Impact Report (DEIR). One of the primary tenets of the Coastal Act is to protect and enhance public access to the coast, which requires a well-planned and interconnected public transportation system. The DEIR for Fast Forward 2040 indicates that the plan “is based on a preferred land use and transportation scenario which lays out a pattern of future growth and transportation system investment for the region emphasizing a transit-oriented development and infill approach to land use and housing.” The “Improving the System” and “Integrating Transportation and Land Use” sections of Fast Forward 2040 provide strategies to enhance public access throughout the Santa Barbara region, and strategies to develop future infrastructure in consideration of environmental conditions including sea level rise.

This plan update provides an opportunity to prioritize projects and programs which enhance both the public transportation system and coastal resources. Projects that accomplish both goals (e.g. passenger rail service expansion within existing rail corridors) should be prioritized within the Programmed project list (Measure A funded and other), while other projects that enhance one mode of transportation but adversely affect coastal resources may be included on the Planned and Illustrative project lists, to be implemented after Programmed projects. Many policies that will guide project planning and implementation are identified in Fast Forward 2040 and the Draft Supplemental Environmental Impact Report. However, please note that the Coastal Act and jurisdictions’ Local Coastal Programs are the Coastal Commission’s standard of review for projects in the Coastal Zone. Following are six topics where Coastal Commission staff would encourage enhancements to Fast Forward 2040 to provide greater consistency with coastal policies:

- 1) Coastal Act Policies on Marine Resources and Environmentally Sensitive Habitat Area.** The transportation corridors within the Santa Barbara region bisect or are located directly adjacent to sensitive marine resources including coastal bluffs, coastal lagoons, and the Pacific Ocean. Impacts to these resources are restricted by Coastal Act policies. Except for certain specific instances, fill of a

wetland or other coastal waters is prohibited (Section 30233), and the marine resources (Section 30230), water quality (Section 30231), and environmentally sensitive habitat areas (Section 3024) often associated with the coastal environment are also protected. Many of these coastal systems have already deteriorated due to historical transportation infrastructure development. Future transportation improvements planned for the Coastal Zone should seek to ameliorate previous deterioration and enhance coastal resources.

The Coastal Commission has previously approved roadway expansion projects in sensitive coastal locations, but only where impacts to coastal resources were reduced to the minimum extent required in order to improve the public transportation system. For example, the Coastal Commission approved the San Diego North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program in June 2014, requiring impacts to coastal resources to be minimized, requiring mitigation for impacts to environmentally sensitive habitat at a ratio of 4:1, and requiring the provision of new rail trails and bike and pedestrian access ways in concert with expansion of roadways and freight rail tracks.

Coastal Commission staff request that the Fast Forward 2040 document include specific reference to Coastal Act Chapter 3 policies requiring the preservation of coastal resources, including Coastal Act Section 30240 which states that development must be planned to protect environmentally sensitive habitat against significant disruption of habitat values. The Final EIR should be modified to reference the preference for avoidance of impacts, rather than mitigation of impacts, and should remove references to minimum 2:1 mitigation ratios (e.g. BIO-1 (D) Restoration and Monitoring section), as the Coastal Commission and other resource agencies have previously required greater mitigation ratios. The “Protected Lands section on page 136 of Fast Forward 2040 should be modified to reference the resource preservation policies of the Coastal Act.

2) California State Rail Plan and 101 In Motion (Add a Lane and a Train). The Coastal Commission has previously approved transportation projects and programs that balance roadway expansion with provision of transportation alternatives including rail, bicycle corridors, and pedestrian access ways (e.g. the San Diego North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program). In its recent approval of the Santa Barbara 101 HOV Lane project, the Coastal Commission found that the roadway improvements were consistent with Coastal Act policies requiring maximum public access and a reduction in vehicle miles traveled (see Sections 30210 and 30253), based on the expectation that the region would contemporaneously be increasing passenger rail service and providing transportation alternatives. The 101 in Motion report (Santa Barbara County Association of Governments, 2006) included a key project, element labeled “Add a Lane and a Train,” proposing to add a HOV lane in both directions south of Milpas to the Ventura County Line, while also adding commuter rail service from Camarillo/Oxnard to Goleta with stops in Carpinteria, Santa Barbara and Goleta. Those projects were partially funded with Santa Barbara County Measure A Road Repair, Congestion Relief and Transportation Safety Program funding, approved by County voters in 2008.

The 2013 California State Rail Plan and the LOSSAN Corridorwide Strategic Implementation Plan (April 2012) reference a potential expansion of intrastate passenger rail service through

implementation of a “Coast Daylight” train service, “proposed to initially operate with one daily round trip as an extension of the state-supported Pacific Surfliner service. Expansion of the Coast Daylight service to two daily round trips will be accomplished by adding a new overnight train between San Francisco and Los Angeles.” One goal of the Coast Daylight is to “increase the use of intercity passenger rail service as part of a multi-modal strategy identified in regional and county goals and plans.” The Draft 2018 California State Rail Plan website states: “Californians collectively take billions of trips to millions of destinations each year, and the state needs quality modal choices among cars, transit, air travel, and active transportation to efficiently move people and freight to their destinations.”

The Fast Forward 2040 plan should be consistent with Coastal Act requirements and previous Santa Barbara area government and citizen commitments to minimize vehicle miles traveled and prioritize funding and implementation of expanded passenger rail and alternative transportation options. The 2013 California State Rail Plan (Chapter 8 - Passenger Rail Improvements) identified many rail improvements for priority implementation, including San Luis Obispo to Santa Barbara track upgrades which are also identified as a priority project in the LOSSAN North Corridor Strategic Plan. Related projects which have been completed include the Ortega siding (reconstruction) and Seaciff siding extension and curve realignment. Siding extension is also proposed along Guadalupe, Narlon, Concepcion, and Sandyland rail segments. Infrastructure improvements necessary to facilitate faster and more frequent passenger/commuter rail service should be included on the Programmed project list, and provision of additional daily trains should be identified as a priority of Fast Forward 2040 (expanding on the reference on page 110 of the plan).

- 3. Plan for Sea Level Rise.** Coastal Act Section 30253 requires that new development minimize risks to life and property from hazards and to assure stability and structural integrity without the use of a shoreline protective device. Thus, understanding the potential impacts of climate change and sea level rise is of critical importance when beginning long-range planning efforts so as to ensure that land use decisions and development projects are not designed in a way that will put investments at risk from coastal hazards. Given the proximity of key regional infrastructure to the coast, it is imperative that transportation and land use plans carefully anticipate the effects of sea level rise and associated hazards. Ensuring that new coastal infrastructure is designed to adapt to the effects of sea level rise throughout the expected life of the infrastructure is a principal concern of the Coastal Commission, as clarified through the Commission’s Sea Level Rise Policy Guidance (2015) and through recent Commission actions on key infrastructure projects throughout California.

Fast Forward 2040 should expand the analysis within the Climate Change Impacts and Adaptation on page 36, and reference the best available science on climate change and sea level rise (e.g. the 2012 National Research Council Report, *Sea Level Rise for the Coasts of California, Oregon, and Washington*). The plan should make clear that sea level rise conditions must be modeled for the entirety of the expected life of new infrastructure projects, which in the case of rail and highway bridges is considered to be 100 years. Projects should be modeled to include both tidal and fluvial hydraulics across the range of projected increases in global mean sea level as applied to the local area (e.g. Santa Barbara County open coast) and in the context of storm surge, wave run-up, erosion, and other variables.

If Fast Forward 2040 includes infrastructure improvements that are likely to be temporarily flooded or perpetually inundated by water in the next 75 to 100 years, then the EIR for the plan update should analyze potential adaptation measures that minimize adverse impacts to coastal resources and enhance public access to the coast. The EIR should analyze whether planned infrastructure would need to be protected from coastal hazards, such as flooding and erosion, with shoreline armoring devices including seawalls and revetments, which adversely affect public access because they block access to the beach and result in the loss of public recreational areas. Additionally, the EIR should analyze alternative infrastructure projects that minimize the need for shoreline armoring and include options for relocation of infrastructure segments away from hazardous conditions.

4. Public Access and Recreation. A pillar of the Coastal Act is the protection and provision of public access to, and along, the coast. Coastal Act sections 30210 and 30212 require that maximum opportunities for public access and recreation be provided in new development projects, consistent with public safety, private property rights, and natural resource protection. Additionally, Section 30252 dictates that new development should maintain and enhance public access through such actions as facilitating transit service, providing non-automobile options, and providing adequate parking. Accordingly, the EIR should evaluate the Regional Transportation Plan update for consistency with the above-mentioned policies. In particular, there should be an analysis of how the plan would maximize access to the coast, including options for non-motorized, bicycle, and pedestrian routes and related amenities throughout the region. This analysis should incorporate evaluation of ways to facilitate access to beaches and coastal areas from the inland portions of the region, as well as options for enhancing connections to public transit, the Coastal Trail, the Coastal Rail Trail, and other visitor-serving recreational opportunities.

Page 52 of Fast Forward 2040 includes a strategy to: “Work to complete the California Coastal Trail through provision and implementation of trail segments and connections in coordination with the California State Coastal Conservancy, California Department of Parks and Recreation, California Coastal Commission, Caltrans, and other agencies.” This section should be expanded to identify funding for Coastal Trail projects as a priority and should include a requirement that all Caltrans and local government roadway projects be evaluated for potential overlap and connection with the Coastal Trail during the project design phase.

5. Concentration of Development. Section 30250 of the Coastal Act generally requires that new development within the Coastal Zone be located within, contiguous with, or in close proximity to existing developed areas, and Section 30253 requires new development to be sited in a manner that will minimize energy consumption and vehicle miles travelled. In this way, the Coastal Act encourages smart growth patterns that recognize a strong urban-rural boundary to ensure protection of coastal resources. Accordingly, the EIR should analyze the extent to which various alternatives, as well as the broader goals of the Sustainable Communities Strategy would be consistent with and mutually supported by such concentration of development.

While page 142 of the plan indicates that “Fast Forward 2040’s forecasted development pattern for the region, when integrated with the transportation network and policies, achieves the California Air Resources Board (ARB) target for reduction of GHG emissions from passenger vehicles for both

target years 2020 and 2035,” consistent with SB 375, greenhouse gas emissions targets for 2035 and 2050 do not appear to be consistent with the Executive Order B-30-15 goal of reducing California’s GHG emissions to 40 percent below 1990 levels by 2030 and the Executive Order S-3-05 goal of reducing California’s GHG emissions to 80 percent below 1990 levels by 2050. While the proposed plan (preferred scenario) includes more investment in transit and active transportation than any previous RTP, it does not prioritize the implementation of public transit and active transportation projects to minimize vehicle miles traveled consistent with Coastal Act Section 30253.

The Draft Environmental Impact Report indicates that one of the plan alternatives (scenario 7) would increase focus and investment on transit priorities, and potentially reduce impacts to coastal resources while still achieving all of the plan objectives; however the DEIR concludes that “because Scenario 7 considers expansion of transit beyond resources anticipated to be reasonably available, it is not fiscally constrained and therefore not eligible.” The DEIR indicates that the California Air Resource Board is expected to adopt new greenhouse gas reduction targets. Given that those targets are likely to require implementation of new projects and strategies to reduce single-occupant driving, the EIR should include additional analysis of transportation alternatives which are most protective of sensitive coastal and environmental resources while at the same time achieving the plan objectives. While there may be existing constraints that make the environmentally superior alternative infeasible today, Fast Forward 2040 is a long-range planning document and there will likely be changes in policy and funding for transit within its planning horizon – especially if SBCAG advocates for such changes. As such, SBCAG should place a greater emphasis on the prioritization of public transit and active transportation projects and include additional analysis of such projects in the Final EIR.

6. Visual Resources. Coastal Act Section 30251 states that the scenic and visual qualities of coastal areas should be considered and protected as a resource of public importance. Permitted development should be sited and designed to protect views to and along the ocean and scenic coastal areas. In order to preserve and enhance visual resources and scenic views of the coastal environment from Highway 101 and scenic roadways adjacent to the coast, new bridge and highway projects should incorporate aesthetic see-through bridge rails at the lowest height necessary to guarantee safety, consistent with the bridge rails and barriers guidance previously developed by the Coastal Commission + Caltrans Road’s Edge Subcommittee. The Streets and Roads section on page 102 of Fast Forward 2040 references bridge replacement projects, which are included in project lists in other areas of the plan. The plan should reference the requirement that new bridges and roadways include guardrails designed to preserve visual resources.

Additionally, special care should be taken to preserve visual resources and scenic views on State Scenic Highways, including but not limited to the Gaviota Coast section of Highway 101. Caltrans approved the Gaviota Coast section of Highway 101 as a State Scenic Highway in December of 2016. This designation was made possible by the County of Santa Barbara’s coastal visual policies, California State Parks; natural and cultural preservation mandates, and the local community’s effort and involvement over many years to protect the scenic quality along the Gaviota Coast. Designation as a State Scenic Highway affirms that scenic vistas along Santa Barbara County’s highways are a valuable resource to the community, and Fast Forward 2040 should reflect that affirmation in its policies and project lists.

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Thank you for the opportunity to comment on the environmental review for the Regional Transportation Plan/Sustainable Community Strategies update. Coastal Commission staff look forward to future collaboration on improvements to the transportation system within the Santa Barbara region, and appreciate the commitments presented within the draft plan to preserve and enhance coastal resources. If you have any questions or concerns, please do not hesitate to contact us in the Coastal Commission's Long Beach or Ventura District offices.

Sincerely,

Zach Rehm
Senior Transportation Program Analyst

Cc: Deanna Christensen, Supervising Coastal Program Analyst
Barbara Carey, District Manager
Steve Hudson, Deputy Director
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Letter # CC Responses

1. SBCAG RTP projects within the Coastal Zone, as defined by the Coastal Commission, are required to adhere to all applicable Coastal Commission policies and regulations, including those protecting sensitive marine resources. This includes Sections 30230, 30231, 30233, and 30240. A specific reference to Coastal Act Section 30240 has been added to the SEIR, pg. 123, under the heading, *California Coastal Commission*. The 2:1 mitigation ratio identified in mitigation measure Bio-1(D) is a minimum ratio that does not preclude project sponsors requiring higher mitigation ratios based on specific circumstances with individual projects.
2. This comment does not raise an environmental concern related to the SEIR. The Fast Forward 2040 RTP includes alternative transportation projects including rail, bicycle, and pedestrian improvement projects. See SEIR Table 3, *Fast Forward 2040 RTP Project List*. Projects listed in the RTP supporting SBCAG's commitment to improved passenger rail include:
 - a. South Coast Commuter/Passenger Rail Program – supports improved operations (Msr A, \$10,850,000)
 - b. VEN-SB Rail Siding Project (Seacliff) – for needed capacity improvements (Prog Other, \$24,320,000)
 - c. South Coast Commuter Rail – supports improved operations (Prog Other, \$31,156,000)
3. The SEIR is a programmatic document that assesses potential impacts from the proposed projects listed in Fast Forward 2040. . Project sponsors of individual projects will be required to address potential impacts from sea level rise for the life expectancy of the project and take into consideration the Coastal Commission's Sea Level Rise Policy Guidance (2015) and other recent actions. A discussion of that policy has been added to the SEIR on page 231 under the heading *Flooding*. The SEIR acknowledges potential impacts from sea level rise. Mitigation Measure HWQ-3(A) states, "If a Fast Forward 2040 project is located in an area with high flooding potential due a storm event or dam inundation or sea level rise due to climate change, the project sponsor shall ensure that the structure is elevated at least one foot above the 100-year flood zone elevation and that bank stabilization and erosion control measures are implemented along creek crossings." [underline added] Portions of the comment relating directly to the Fast Forward 2040 RTP have been addressed in that document.
4. The Final SEIR has added discussion on coastal access. In Section 4.12 Transportation and Circulation, a new heading, *g. Coastal Public Access*, has been added on page 265, and additional discussion has been added under the heading, *Bicycle and Pedestrian Facilities and Standards* on page 270. The SEIR is a programmatic document that assesses potential impacts from the proposed projects listed in Fast Forward 2040. It is outside the scope to evaluate the effectiveness of projects in meeting specific criteria such as beach access. Fast Forward 2040 is consistent with local planning documents and transportation plans that include policies for maintaining and improving coastal access. A goal of Fast Forward 2040 is *Mobility & System Reliability*, which states "ensure the reliability of travel by all modes." Table 3 of the SEIR lists the new projects in Fast Forward 2040 and includes bicycle and pedestrian projects. Fifteen pedestrian projects and four bicycle related projects are identified in the list. The purpose of the SEIR is to identify and address potential environmental impacts from the implementation of Fast

Forward 2040. An evaluation of ways to maximize or facilitate beach and coastal access is beyond the scope of the SEIR.

5. The Fast Forward 2040 RTP-SCS provides several land use scenarios and the EIR assesses these alternatives for the reduction of greenhouse gases by reducing vehicle miles travelled (VMT). SB 375 (The Sustainable Communities and Climate Protection Act), requires the State to set specific regional targets for the reduction of greenhouse gases. Fast Forward 2040 is intended to meet the SCS targets as set by the California Air Resources Board (CARB). A discussion on consistency with Executive Order B-30-15 can be found in section 4.8 Greenhouse Gas Emissions, page 215, under the heading, *Post-2020 Long Term Significance Threshold*. As stated on page 215, “Estimated VMT data were used to determine whether Fast Forward 2040 would impede substantial progress toward achieving the projected emissions reduction targets established by SB 32 (2030 standard [set by B-30-15]) and EO S-3-05 (2050 standard).” Neither SBCAG nor Fast Forward 2040 have any land use authority in the County and cannot direct the siting of land use development. Regardless, Fast Forward 2040 is consistent with Coastal Act Section 30253 in planning to reduce VMT. Section 4.5 Energy discusses potential impacts of the project on Energy with the conclusion that Fast Forward 2040 would consume less energy than the No Project scenario (Impact E-1). Implementation of mitigation measures E-1(A-C) would also reduce energy consumption. Section 4.12 Transportation and Circulation has identified that the proposed project would reduce VMT compared to the No Project scenario. Per CEQA, the SEIR assesses a range of reasonable alternatives to the proposed 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. Scenario 7 is not a feasible alternative since it goes beyond the available funding for this RTP’s planning period. Sufficient funding is not available for the additional transit priority projects included in Scenario 7; therefore, the theoretical GHG reductions associated with the scenario are not feasible. n. Future updates to the RTP-SCS will re-evaluate the list of transportation improvements based on the funding available at that time.
6. A discussion of Coastal Act Section 30251 is included in the SEIR in Section 4.1 *Aesthetics*, on page 76, under the heading *Regulatory Setting*. Sections of U. S. 101 have been identified in the SEIR as a scenic highway with the entire length of U. S. 101 through the county identified as eligible for the designation. The SEIR is a programmatic document and therefore does not discuss specific mitigation for individual project impacts. Project sponsors will need to address potential impacts to visual resources in their project-specific environmental documentation. Mitigation Measures AES-1(A-E) are included in the SEIR to reduce potential visual impacts. This includes AES-1(C) that states, “The project sponsor shall ensure that a project in a scenic view corridor will have the minimum possible impact, consistent with project goals, upon foliage, existing landscape architecture and natural scenic views.”