

# SANTA BARBARA COUNTY BOARD AGENDA LETTER



Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
(805) 568-2240

**Agenda Number:**  
**Prepared on:** 6/4/04  
**Department Name:** County Administrator  
**Department No.:** 012  
**Agenda Date:** 6/15/04  
**Placement:** Administrative  
**Estimate Time:**  
**Continued Item:** NO  
**If Yes, date from:**

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**TO:** Board of Supervisors

**FROM:** Michael F. Brown  
County Administrator

**STAFF CONTACT:** Jim Laponis, Deputy County Administrator  
568-3400

**SUBJECT:** Comment Letter on the Environmental Assessment for Proposed Trust Acquisition of Land (6.9 acres) and Associated Development – Santa Ynez Band of Chumash Indians

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## **Recommendation:**

That the Board of Supervisors approve and authorize the Chair to sign a comment letter (attached) on the subject Environmental Assessment.

## **Alignment with Board Strategic Plan:**

The recommendation is primarily aligned with Goal No. 1. An Efficient Government Able to Respond Effectively to the Needs of the Community.

## **Executive Summary and Discussion:**

An environmental assessment was prepared regarding the proposed 6.9 acre trust acquisition. The assessment was distributed to impacted jurisdictions for comment to the Bureau of Indian Affairs. On behalf of County departments (Fire, Planning and Development, Public Works, County Counsel, Clerk-Recorder-Assessor and Auditor-Controller) that contributed to the comment letter, our office is calendaring the matter for Board consideration.

The attached comment letter is a result of a thorough analysis of the Environmental Assessment. The letter comments on the adequacy of the assessment and proposes mitigations to lessen identified environmental impacts of the proposed trust acquisition and proposed development.

In order to be considered timely, any comments the Board determines to make on this matter must be received by the U.S. Department of the Interior, Bureau of Indian Affairs by June 23, 2004.

**Mandates and Service Levels:**

A comment letter on an environmental assessment is not mandated a letter itself does not impact service levels.

**Fiscal and Facilities Impacts:**

There is a potential loss of property tax revenue if the proposed fee to trust acquisition is approved as well as unknown fiscal impacts stemming from potential future development on trust land absent payment of development impact mitigation fees.

Attachment

cc: Vincent Armenta, Chair, Santa Ynez Band of Chumash Indians  
Jim Anderson, Sheriff  
Robert Geis, Auditor-Controller  
John Scherrei, Fire Chief  
Stephen Shane Stark, County Counsel  
Val Alexeeff, Director of Planning & Development  
Terri Maus-Nisich, Director of Parks  
Phil Demery, Director of Public Works  
Joe Holland, Clerk-Recorder-Assessor

June 15, 2004

Acting Regional Director  
U.S. Department of the Interior  
Bureau of Indian Affairs  
Pacific Regional Office  
2800 Cottage Way  
Sacramento, CA 95825

**RE: Environmental Assessment for Proposed Trust Acquisition of Land and Associated Development-- Santa Ynez Band of Chumash Indians**

Dear Acting Director:

Thank you for the opportunity to offer comments on the Draft Environmental Assessment (EA) for a proposed trust acquisition of 6.9 acres of land in Santa Barbara County by the United States for the Santa Ynez Band of Chumash Indians. Comments are also provided on the subsequent construction of a commercial retail facility, museum and cultural center, parking lot and an open community commemorative park.

**PROJECT DESCRIPTION**

The proposed action evaluated in the EA consists of two main components:

1. Placing the 6.9 acres into federal trust status. The property currently owned in fee by the Tribe would be placed into federal trust status for the Tribe in accordance with the procedures set forth in 25 C.F.R. Part 151. If the BIA determines that the proposal meets statutory requirements and the benefits outweigh the potential negative impacts, it may approve the Tribe's application and take the proposed land into trust for the Tribe.
2. Development of a museum and cultural center, commercial retail facility, and supporting components totaling 41,925 s.f. of building area. An open community commemorative park is proposed as well. In addition, a 105 space paved surface parking lot would be constructed on the site and along Numancia Street. Both parking areas would include parking spaces for the disabled. Access to the parking area would be from Numancia Street. The 6.9 acre property is currently undeveloped.

## **WATER RESOURCES**

### ***Water Supply***

1. The County's primary concern is that the proposed development to be facilitated by this fee-to-trust applications will result in a draw on groundwater resources of the Santa Ynez Valley, thus creating or exacerbating a situation of overdraft. Regardless of how the groundwater is accessed – via on-reservation wells or via off-reservation provision of water from Santa Ynez River Water Conservation District, Improvement District No. 1 (ID1) – the County's concern is maintaining an adequate water supply for all uses in the valley. In some cases this may require balancing uses among many users in the valley, tribal and non-tribal. Towards this end, the County encourages the Tribe to continue to work closely with ID1 and surrounding water users to ensure that all current and future needs are met. In some cases, balancing uses may require the Tribe to import water so as to avoid a detrimental drain on the valley basins. If the Tribe has already developed a water conservation plan for its consolidation project, inclusion of this plan in the EA is appropriate. If the Tribe has not developed such a conservation plan, the County encourages its development.

### ***Grading, Drainage and Stormwater Runoff***

1. Section 3.2 - Description of Affected Environment/Water Resources. Overall, the document is fairly accurate in its description of the baseline Flooding & Drainage condition. However, the County recommends a figure be added which indicates the limits of the 100-year Floodplain & Floodway as shown on the current FEMA Flood Insurance Rate Map (FIRM) and Floodway Map. The County also recommends a figure be added which shows the top-of-bank of Zanja de Cota Creek and a 50-foot setback line.

Section 3.6 - Description of Affected Environment/Socioeconomic Conditions. Currently this property is located within the Santa Ynez Flood Zone and pays a Benefit Assessment to the Flood Control District. Upon development of this property with the proposed project, the Benefit Assessment amount would have increased to and estimated \$110.00 per year to reflect the change in land use and the additional runoff generated by the development. Due to the proposed trust acquisition, this revenue will not be received by the District to offset impacts associated with the proposed development.

Section 5 - Mitigation Measures/Water Resources. The County recommends the following additional mitigation measures:

- Construct a stormwater retardation basin sized for the 25-year storm;
- Elevate development a minimum of 2-feet above the 100-year Base Flood Elevation (BFE) of Zanja de Cota Creek;
- Locate development such that it is setback a minimum of 50-feet from the top-of-bank of Zanja de Cota Creek; and
- Design development with a positive overland escape for a 100-year storm.

Appendix - In the conclusion of the drainage section of the Appendix, there is mention of draining to an existing 12" diameter culvert. The County believes this may be a typo. However, if this is accurate information the County recommends all culverts be a minimum of 18" in diameter.

## **AIR QUALITY**

1. The County is considered a "non-attainment" area for the state health-based air quality standards for ozone and the state standard for fine particulate matter. By pursuing development on Reservation lands in ways that protect local air quality, the Tribe can ensure that regional progress to date toward clean air for all citizens of the Santa Ynez Valley is not jeopardized.
2. The air quality analysis presented in the EA uses incorrect significance criteria to determine the extent of the project's air quality impacts. Santa Barbara County APCD has a long-term air quality significance threshold of 25 pounds per day of either nitrogen oxides (NOx) or reactive organic compounds (ROC). The EA should use the County standards in order to adequately analyze the air quality impacts of this project.
3. In order to adequately analyze the air quality impacts of this project, the County recommends the EA include discussions of all short-term effects separately from long-term effects. Direct, indirect (including growth-inducing effects), and cumulative effects, consistency with the Clean Air Plan, should also be discussed. As a contributor to air quality in the valley, the Tribe can apply pollution prevention methodology into the project to reduce air quality impacts to the maximum extent feasible.

### ***Short-term Emissions***

1. Construction and demolition activities generate fugitive dust. With oversight by the Tribe to ensure that the dust control measures listed on Page 5-2 of the EA are carried out, fugitive dust and the accompanying health effects to residents and visitors can be kept to a minimum. The BIA may want to consider application of County standards to reduce fugitive dust by requiring gravel pads at all access points to prevent tracking of mud on to public roads as a mitigation measure in the EA.
2. The EA erroneously includes an air quality mitigation measure (page 5-2) related to the wastewater treatment facility located on the South Reservation. This mitigation measure should be deleted.

### ***Operation Emissions***

1. To complete the analysis, cumulative air quality impacts and consistency with the 2001 Clean Air Plan (CAP) should be considered by the Tribe and included in the EA. Cumulative air quality impacts are the effect of long-term emissions of the

proposed project plus any existing emissions at the same location plus reasonably foreseeable similar projects on the projected regional air quality or localized air pollution problems. Due to the County's non-attainment status for the state ozone standard and ozone's regional nature, if a project's emissions from traffic sources of either of the ozone precursors (NO<sub>x</sub> or ROC) exceed the long-term thresholds, then the project's cumulative impacts will be considered significant.

2. Consistency with the Clean Air Plan means that direct and indirect emissions associated with the project are accounted for in the Clean Air Plan's emissions growth assumptions and the project is consistent with policies adopted in the Clean Air Plan. The Clean Air Plan relies primarily on the Santa Barbara County Association of Governments land use and population projections and the California Air Resources Board's on-road emissions forecast as the base for vehicle emission forecasting. Any project that would provide for increased population growth above that forecasted in the most recently adopted Clean Air Plan is inconsistent with the Clean Air Plan and may have a significant impact on air quality.

## **BIOLOGY**

1. The proposed project will be located directly adjacent to Zanja de Cota creek, a riparian resource traversing the Township of Santa Ynez, and flowing downstream into the Santa Ynez River. Riparian streams provide important structural components for plant species and habitat for animals, and function as wildlife corridors between the surrounding valley and the Santa Ynez River. While Zanja de Cota creek, similar to other creeks in the Urban and Inner-Rural regions of the Santa Ynez Valley, has a mixture of native and non-native plants and wildlife as identified in the EA, the creek remains an important resource. The County is encouraged that the Tribe will mitigate potential impacts to the creek by establishing a minimum 100 foot setback for all development. The County recommends the BIA consider implementing a habitat restoration plan for Zanja de Cota Creek, prepared by a qualified biologist, to remove non-native plant species and re-plant with species from local native stock to improve the overall habitat, as a mitigation measure in the EA.

## **SOCIOECONOMIC CONDITIONS**

The County is concerned that section 4.1.6 of the EA does not discuss the range of socio-economic impacts presented by the loss of state and local regulation over the subject property and proposed businesses.

### ***Property Taxes***

The EA concludes that the loss of property tax revenue is not a significant socioeconomic effect because the amount of taxes lost in one year is small relative to all property taxes collected. The total loss of property taxes for these parcels is estimated in the EA at \$43,000.00 per year.

However, the County conservatively estimates the annual loss of property taxes is actually \$63,000. Over a 10 year period, this loss of property taxes would therefore be well over \$600,000. Since trust acquisitions are permanently removed from the local tax base, the impact must be viewed as a continuing impact in perpetuity. Local schools in the surrounding area, the primary beneficiary of property tax dollars in California, would experience a loss of hundreds of thousands of dollars due to this permanent loss of revenue. In addition to the fiscal impact to the County's General Fund, other affected taxing entities such as the Fire Protection and Flood Control Districts would also be impacted.

### ***General Regulation of Business Activity***

The County is concerned that the socioeconomic effects of the Fee-to-Trust transfer have not been adequately addressed because the EA does not discuss the loss of state and local regulatory control over the property, and the addition of tribal regulatory authority over the property. The EA states, "[A]fter approval of the fee-to-trust application, the Tribe will receive sovereign control over the property. Accordingly, the 6.9-acre property will be removed from the local tax rolls." However the shift in regulatory control impacts more than the County's ability to collect property taxes. This shift in regulatory control and the resultant socioeconomic impacts should be discussed.

The EA states that "the facility is intended to provide spaces for professional services such as insurance agencies, attorney offices, or doctor offices as well as retail space for such venues as produce and grocery stores, dry cleaners, barber shops, and florist's shops." (EA p. 1-4.) However, the nature of tribal regulation of such service providers is not discussed. The loss of state and local regulatory authority in Indian Country is particularly important given the environmental hazards posed by dry cleaning operations, the health and safety issues posed by barber shop operations, and the multiple state regulations governing the insurance, medical, and legal professions. By locating these operations on trust land, such service providers will escape local and state regulation. Without knowing what tribal regulations, if any, will apply to such service providers, members of the public who use the services of businesses located on trust land will have little security that they are receiving service from providers that meet community standards. The impact and nature of the regulations that will apply on trust land that will offer goods and services to the public should be addressed in the EA.

Additionally, because local and state regulations will not apply to businesses located on the land if taken into trust, the cost to those businesses of complying with the state and local regulation is removed, thus giving them a unique business advantage. In a small community such as Santa Ynez, the introduction of businesses that can charge below market rates will create a market imbalance likely to result in the loss of local businesses not exempt from local regulations because they are not located on trust land. The socioeconomic impacts of the inability of local business to compete with businesses located on trust land should be addressed in the EA.

### ***Sales & Use Taxation***

The EA's analysis of socio-economic impacts is further inadequate because it is silent on the impacts created by the loss of state and local sales and use tax revenue. Presumably the proposed commercial retail facility will house retail businesses that will sell goods to non-Indians that would otherwise be subject to sales and/or use taxes, were they sold off-reservation. (See generally Title 18 California Code of Regulations section 1616.) The EA specifically mentions produce and grocery stores and florist's shops. There are multiple produce, grocery, florist and other retailers currently existing in the Santa Ynez Valley, all of which are required to collect sales taxes. However, similar retailers on trust land are not required to collect sales taxes. Consequently they can offer goods at a below market rate. This creates an unstable economic climate in a small community, where patrons will choose to purchase at below market rates, resulting in loss of economic choice at best and systemic bankruptcies at worst. It is not known if any tribal taxes will apply to businesses located on trust land. If so, this information should be included in and analyzed by the EA. Businesses that offer below market rates are likely to draw customers from outside of the area, resulting in socio-economic impacts far beyond the local community of Santa Ynez. Further, there are no guarantees that uses such as a grocery store or florist shop will continue in the future. For example, a car dealership could be operated on this property causing severe socio-economic impacts both within and outside of the Santa Ynez Valley.

Overall the socio-economic impacts associated with creating a tax and regulatory free enclave in a small community have not been adequately analyzed by the EA, nor have mitigation measures been indicated. For these reasons the County is concerned that the document is inadequate and that the Bureau of Indian Affairs may not rely on it when making its decision on the Fee-to-Trust Application.

## **PUBLIC SERVICES**

### ***Fire Protection***

The County invites the Tribe to continue to work, communicate, and coordinate with the County Fire Department regarding the protection of life and property and fire safety issues generally.

The County requests the following mitigations be required as a condition of any approval of the fee-to-trust application.

1. Construction and maintenance of the proposed structures should be in compliance with all recognized codes, national standards and local ordinances. The Uniform Codes with local amendments governing the safe construction and maintenance of buildings should apply (Uniform Building Code, Uniform Electrical Code, Uniform Fire Code, National Fire Protection Standards etc.). These codes govern such items as occupancy load, approved fire sprinkler systems, safe exiting, and approved fire assemblies such as smoke dampers.



2. To protect life and property on the trust land, a condition of BIA approval of the Tribe's fee-to-trust application should be that the Tribe adhere to nationally recognized and locally adopted standards with respect to adequate emergency access for fire equipment and water supply for fire protection. Fire hydrant distribution and fire flow should meet those standards. It is the policy of the Santa Barbara County Fire Department to require the water purveyor serving the development in question provide the infrastructure. This is to ensure that maintenance, reliability and dependability concerns are met for public safety purposes. The fire department encourages a cooperative working arrangement with the water purveyor to ensure provision of a dependable source of water for domestic and fire protection purposes. Adequate fire department access and water supply should be provided for the project during construction.
3. Furnishings, window coverings, and wall treatments in assembly occupancies (such as the museum) need to be designed, flame-proofed and installed in accordance with applicable National Fire Protection Association and Uniform Fire Code requirements. It is important that all special events held on trust land be conducted in conformance with the above mentioned codes. Public assembly buildings, due to their large numbers of occupants, have special requirements for exit maintenance, storage and handling of flammable and hazardous materials, how displays are conducted, seating configurations, etc. Once the buildings are constructed, periodic fire safety inspections should be performed to ensure compliance with safety codes for the protection of life and property.
4. Numancia Street should be widened and improved from Edison Street to the dead end. The minimum roadway width should be 40 feet and a fire department approved turn-around should be created at the end of Numancia.
5. Driveway entrance to the parking lot should be a minimum of 30 feet in width and should align with Tyndall Street to the North.
7. Fire lanes around all structures of the development should be constructed for fire department access with adequate setbacks. During the project design, the County requests an opportunity to review these elements for adequacy.
8. The fire department requests Edison Street be widened and improved from Highway 246 to Numancia Street in accordance with County Public Works Department requirements.
9. Fire hydrants should be installed. The number of hydrants required can be determined once a detailed project design is completed. The hydrants should be located per fire department specifications and should flow 1250 gallons per minute at a 20 psi residual pressure. Prior to installation, plans showing locations, size and type of

hydrants, valves, main lines and lateral lines should be approved by the fire department.

In addition, please be advised the following are typical conditions that must be met prior to a project being cleared for occupancy when the project is otherwise located in County's jurisdiction:

10. Building address numbers should be posted in conformance with fire department standards.
11. County Fire Department fire or emergency alarm system requirements should be met. Plans should be approved by the fire department prior to installation.
12. Portable fire extinguisher(s) are required and should be in accordance with the County Code Chapter 15, Article 1.
13. When access ways are gated, a fire department approved locking system should be installed.
14. County Fire Department fire sprinkler system requirements should be met. Fire sprinkler system plans should be approved prior to installation. Location of any fire department connection should be determined by the fire department.

The County requests that a condition of approval of the Tribe's fee-to-trust application be that the County and the Tribe enter into an enforceable intergovernmental agreement to address issues related to public safety and fire service. Such an agreement will provide specific mitigation of the identified public safety impacts.

### ***Solid Waste***

1. The EA states that solid waste from the proposed project would be transported to the Foxen Canyon landfill by Health Sanitation Service (HSS). The solid waste at the project site is collected by Waste Management and it is disposed of at the Tajiguas landfill located along the Gaviota Coast. The additional solid waste generated as part of this project is insignificant as it relates to Tajiguas landfill disposal capacity. However, even though this waste would not be subject to County or State regulatory control, waste generated from the proposed project and from projects on all other trust reservation lands, are included in the total waste generated by the County subject to a State mandate for 50 percent waste diversion from landfills. Implementation of a waste reduction program for projects on trust and reservation land, including this project, would assist the County in meeting this diversion mandate and extend the life of the landfill.

### **NOISE**

1. The EA identifies that temporary noise levels will increase during construction activities for the project, but that no significant traffic or operational noise impacts would result from the project. The County standard for sensitive receptors includes residential development within 1,600 feet from construction activity would generally result in potentially significant impacts. Sensitive receptors to the noise generated by the proposed project include several residences located 50 feet north of the project site on Numancia Street. In the absence of Tribal regulations governing noise levels and associated impacts, the EA should consider application of County regulations that reduce the noise levels during both construction and operation of the facility as mitigation measures.
2. The EA should require as a mitigation measure, the prohibition of all nighttime construction and limit daytime construction activity for site preparation to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. Construction equipment maintenance should be limited to the same hours. Stationary construction equipment that generates noise which exceeds 65 dBA at the project boundaries should be shielded to reduce noise. Since the nearest residence is only 50 feet north of the project site, construction equipment should be located away from the residence to the maximum extent feasible. Similarly, the County recommends the Tribe limit deliveries to daytime hours to further reduce operational noise.

## **TRAFFIC AND CIRCULATION**

In order to determine impacts and needed mitigation measures, the County recommends the EA include an updated traffic impact study reflecting *current* traffic data to:

- a. Determine the estimated total trip generation for the proposed development;
- b. Determine the appropriate width of Edison north of SR 246 to ensure proper geometrics that will allow for a south bound exclusive right turn lane onto SR 246 at the signal;
- c. Review the need for relocation of any signal standards or other infrastructure necessary to serve the proposed development; and
- d. Evaluate signal timing at the Edison/SR 246 intersection in light of traffic impacts associated with the proposed project.

In addition, the County offers the following comments related to traffic analysis contained in the EA.

1. The driveway into the proposed parking lot should align with Tydall Street or be spaced 50 feet apart to avoid conflicting turning movements and possible collisions. The study should evaluate the project's impacts to Numancia St. with regard to access for existing businesses and residences utilizing this corridor.

2. The west end of Numancia St. should be evaluated to ensure adequate turn-around capabilities are available.
3. Full costs of infrastructure improvements should be quantified and paid for by the Tribe as part of this development proposal.
4. It should be noted in the Draft EA that parking for the County's Santa Ynez Park is located along Numancia Street. The proposed project should ensure that adequate onsite parking is provided so that County park visitors maintain full access to the existing on street parking facilities.

## **LAND USE AND VISUAL RESOURCES**

1. The County uses two primary planning tools as guidelines for all development: (1) the Comprehensive Plan (general plan), which states land use goals and policies, and (2) the Zoning Ordinance, which states standards for development. These planning tools provide long-range planning for existing and future land use in the County and the ability to ensure that development protects the public health, safety and welfare of the entire community. In the absence of similar planning tools for Reservation lands, the County relies on its established regulations that are applied to unincorporated areas of the Santa Ynez Valley. The County recommends the use of the policies and standards contained in these documents as an appropriate planning tool for the project site and for compatibility with the surrounding land uses. If other regulations are used, the EA should identify them in detail.
2. The EA identifies the proposed project as a commercial and tourist attraction consistent with the surrounding land uses, and that no significant impact will result. However, the EA does not assess the project in light of the County Comprehensive Plan (general plan) Land Use Element goals. Specific land use goals for the Santa Ynez Valley state that the beauty of the land should be preserved by limiting urban sprawl and creating buffer zones to maintain the individual character of each town, and that tourism should be encouraged as a use consistent with preservation of open space. The County is currently updating the Comprehensive Plan for the Santa Ynez Valley. A major focus of the community is to maintain the rural character of each township and distinct urban boundaries. As currently proposed, the scale and mass of the proposed project will have significant adverse impact on the Santa Ynez Township.
3. The County also uses a discretionary permit process to determine if the size and intensity of a major project is appropriate for a particular site, neighborhood or community. Under a Conditional Use Permit (CUP), the County must make findings that the site for development is adequate in size, location and physical characteristics, environmental impacts are mitigated to the maximum extent feasible, streets and highways are adequate, adequate public service is available to serve the project, and

*“that the project will not be detrimental to the health, safety, comfort, convenience and general welfare of the neighborhood and will be compatible with the surrounding area.”* The County recommends that the EA apply these standards when evaluating the proposed project’s impacts on the surrounding land uses. If other standards are applied, the EA should identify them in detail.

4. The County Land Use Element contains visual resource policies to reduce impacts from development. One policy is that new structures shall be in conformance with the scale and character of the existing community. The County is concerned that the size and height of the structures and accompanying lighting will result in a significant impact on the rural character of the area during the day and increased lighting in the nighttime sky. Potential landscaping along Hwy 246 is unlikely to adequately screen the mass of the structures and the extensive proposed parking lot from the highway, portions of the Santa Ynez Township or the surrounding residential neighborhoods. The County encourages the Tribe to consider design standards for the proposed project to limit the size and bulk of the structures, improve building articulation, and limit lighting by using fully-shielded, low-to-ground light fixtures throughout the site.
5. The site will bridge the architectural gap between the casino which can be described as “modern Southwest” and the Santa Ynez Township which can be characterized as “turn of the century rural”. Reconciliation of design themes is normally resolved through the County Board of Architectural Review. Use of this body would greatly reduce concerns regarding the impact of the proposed uses on the appearance of the community.
6. The County recommends the EA include as a mitigation coordination between the Tribe, Pacific Gas & Electric (PG&E), and the local telecommunication service to underground all existing and proposed utilities on the project site to reduce visual impacts of the project.

## **CUMULATIVE EFFECTS**

1. The incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions are considered cumulative effects under NEPA and must be discussed in the Environmental Assessment. The EA should include a discussion of the proposed project’s contribution to cumulative effects when added to impacts associated with the recently completed Chumash Casino Consolidation Project.

The County of Santa Barbara appreciates the Bureau of Indian Affairs making the EA available for public comment. The County believes that sharing information between federal, local and tribal governments is key to ensuring sensitive development in the Santa Ynez Valley. County hopes that it may continue to offer input on future fee-to-trust applications and related development projects on trust and reservation land that the Tribe may pursue. Thank you for the opportunity to offer comments on the proposed project. If

the Bureau of Indian Affairs has any questions concerning these comments, please contact Michael Brown, County Administrator, at (805) 568-3400.

Respectfully,

Joseph Centeno, Chair  
Board of Supervisors  
County of Santa Barbara

cc: Honorable Barbara Boxer, United States Senator  
Honorable Lois Capps, United States Congresswoman  
Honorable Tom McClintock, California State Senator  
Honorable Hannah-Beth Jackson, California State Assemblywoman  
Honorable Abel Maldonado, California State Assemblyman  
Virgil Townsend, Superintendent, U.S. Department of the Interior, Bureau of Indian Affairs – Southern California Agency  
John Barrios, Environmental Protection Specialist, U.S. Department of the Interior  
Vincent Armenta, Chairman, Santa Ynez Band of Chumash Indians  
Greg Albright, Caltrans District 5 Director  
Steve Price, Caltrans District 5  
Solvang City Council  
Buellton City Council  
Chris Dahlstrom, Santa Ynez River Water Conservation District, Improvement District No.1  
Bonnie Ottoman, Santa Ynez Community Services District  
Santa Ynez Valley Airport Authority  
Diana Waterman, Waterman & Associates  
Jan Boel, Acting Director, Governor's Office of Planning and Research  
Michael Brown, County Administrator  
Stephen Shane Stark, County Counsel  
Val Alexeeff, Planning and Development Director  
John Scherrei, County Fire Chief  
Douglas Allard, Air Pollution Control Officer

Attachment: Letters of comment by members of the public received by the County on the Fee-to-Trust Transfer of 6.9 acres.