



## **RICHARDS RANCH ANNEXATION FINAL EIR**

# **VOLUME 2: 2022 DRAFT EIR RESPONSE TO COMMENTS**

SCH NO. 2022020194

### **PREPARED FOR**

City of Santa Maria  
Community Development Department  
110 South Pine Street, Suite 101  
Santa Maria, CA 93458

## **VOLUME 2.1: RESPONSE TO COMMENTS ON THE 2022 DEIR**

July 2024

### **PREPARED BY**

SWCA Environmental Consultants  
4111 Broad Street, Suite 210  
San Luis Obispo, CA 93401





## **VOLUME 2**

### **RICHARDS RANCH ANNEXATION**

### **RESPONSE TO COMMENTS ON THE 2022 DRAFT ENVIRONMENTAL IMPACT REPORT SCH NO. 2022020194**

Prepared for

**City of Santa Maria**  
**Community Development Department**  
110 South Pine Street, Room 101  
Santa Maria, California 93458  
Contact: Dana Eady, Planning Division Manager

Prepared by

Bobbette Biddulph, Project Manager  
Emily Creel, J.D., Project Director

**SWCA Environmental Consultants**  
4111 Broad Street, Suite 210  
San Luis Obispo, California 93401  
(805) 543-7095  
[www.swca.com](http://www.swca.com)

SWCA Project No. 70173

July 2024





## CONTENTS

<b>Chapter 1.</b>	<b>Response to Comments on the 2022 Draft EIR .....</b>	<b>1.1-1</b>
1.1	Master Responses .....	1.1-1
1.2	Agency Comment Letters and Responses .....	1.2-1
1.2.1	California Governor’s Office of Planning and Research State Clearinghouse.....	1.2-3
1.2.2	California Department of Conservation Geologic Energy Management Division....	1.2-7
1.2.3	California Department of Fish and Wildlife.....	1.2-11
1.2.4	County of Santa Barbara Public Works Department.....	1.2-31
1.2.5	Santa Barbara Local Agency Formation Commission .....	1.2-33
1.2.6	Santa Barbara County Air Pollution Control District.....	1.2-49
1.2.7	County of Santa Barbara.....	1.2-65
1.3	Non-Agency Organization Comment Letters and Responses .....	1.3-1
1.3.1	Santa Ynez Band of Chumash Indians .....	1.3-3
1.3.2	Santa Barbara County Action Network .....	1.3-5
1.3.3	Urban Planning Concepts, Inc. ....	1.3-7
1.4	Public Comment Letters and Responses.....	1.4-1
1.4.1	Heather Paige.....	1.4-7
1.4.2	Bob Gnibus.....	1.4-9
1.4.3	Susan Bryant.....	1.4-49
1.4.4	Cynthia Melendez.....	1.4-61
1.4.5	Mary Ellen Peters .....	1.4-65
1.4.6	Lynn Alvarez .....	1.4-68
1.4.7	Alyssa Boger .....	1.4-70
1.4.8	Stephanie Burks.....	1.4-72
1.4.9	Jermaine Castillo .....	1.4-74
1.4.10	Ismael and Linda Castillo.....	1.4-76
1.4.11	Debra Coker.....	1.4-78
1.4.12	Leslie Griego .....	1.4-80
1.4.13	Jillian Hankins.....	1.4-82
1.4.14	Tiffany Hopkins.....	1.4-84
1.4.15	Mary Housel .....	1.4-86
1.4.16	Edward and Catriena Lyons .....	1.4-88
1.4.17	Anastacia Malm.....	1.4-91
1.4.18	Carolyn and Robert McBurney.....	1.4-94
1.4.19	Kara Miller .....	1.4-96
1.4.20	Maria Perez.....	1.4-98
1.4.21	Jesse Skoda.....	1.4-100
1.4.22	Marisol Vazquez De Duyck .....	1.4-102
1.4.23	Charlee Zleisy-Wilson.....	1.4-104
1.4.24	Linda Adams.....	1.4-106

1.4.25	Dan Applebay .....	1.4-108
1.4.26	Jennifer Arkinson .....	1.4-110
1.4.27	Natalie Bakke and Family .....	1.4-112
1.4.28	Steven Beebe .....	1.4-114
1.4.29	Anna Blundell.....	1.4-117
1.4.30	Lynn Burchard.....	1.4-119
1.4.31	Cortez Family .....	1.4-121
1.4.32	Stephanie Cortner .....	1.4-123
1.4.33	Cherie and Eldon Cribbs.....	1.4-125
1.4.34	Haylie Cribbs.....	1.4-127
1.4.35	Chyanne Gaona.....	1.4-130
1.4.36	Teresa Gardner .....	1.4-132
1.4.37	Deborah Guerero .....	1.4-134
1.4.38	Vivian R. Hernandez .....	1.4-136
1.4.39	Jazmín.....	1.4-139
1.4.40	Kristina Johnson .....	1.4-141
1.4.41	Renee Kolding .....	1.4-143
1.4.42	Duft Family .....	1.4-145
1.4.43	Eric and Natalie Mahoney .....	1.4-148
1.4.44	Kayla Moore.....	1.4-150
1.4.45	Amber Nelson.....	1.4-152
1.4.46	Armando Nol .....	1.4-154
1.4.47	Jazmin Nol.....	1.4-156
1.4.48	Sandra A. Peterson .....	1.4-158
1.4.49	Peggy Rokos.....	1.4-160
1.4.50	Martha Silva .....	1.4-162
1.4.51	Patricia S. Sly (Feighner).....	1.4-164
1.4.52	Katie Sly .....	1.4-166
1.4.53	Dr. Jacob and Melinda Studer .....	1.4-168
1.4.54	Carol Toney .....	1.4-170
1.4.55	Karli Tripp.....	1.4-172
1.4.56	James D Valente .....	1.4-174
1.4.57	Noemi Vargas.....	1.4-176
1.4.58	Curtis Warner .....	1.4-178
1.4.59	Lois Weddle.....	1.4-183
1.4.60	Nancy Jensen .....	1.4-185
1.4.61	Steigler.....	1.4-187
1.4.62	Francine Hutchinson.....	1.4-189
1.4.63	Salvador Morales.....	1.4-191
1.4.64	Ardis Neilsen .....	1.4-193
1.4.65	Mary Jo Silbernagle.....	1.4-195
1.4.66	Candace Thompson .....	1.4-197



1.4.67	Lynnetta Zuzow .....	1.4-199
1.4.68	Michelle Betty .....	1.4-201
1.4.69	Elizabeth Lopez-Doll.....	1.4-203
1.4.70	Alan and Barbara Walker .....	1.4-205
1.4.71	Ken Hough.....	1.4-207
1.4.72	Robert Whittier .....	1.4-209
1.4.73	Sofy.....	1.4-211
1.4.74	Pam Mathews .....	1.4-213
1.4.75	Charlotte Pettit.....	1.4-215
1.4.76	Donna Pulling.....	1.4-217
1.4.77	Chris Seymour .....	1.4-220
1.4.78	Nancy Snyder .....	1.4-222
1.4.79	Concerned Citizen .....	1.4-224
1.4.80	Tim Rogers .....	1.4-226
1.4.81	Heather Reese .....	1.4-238
1.4.82	Myrna Heldfond .....	1.4-240
1.4.83	Stephen Teague.....	1.4-242
1.4.84	Cliff Solomon .....	1.4-244
1.4.85	Laurie Haro.....	1.4-246
1.4.86	Kenneth McCalip.....	1.4-248
1.4.87	Michael Edberg.....	1.4-250
1.4.88	Susan Ferrant .....	1.4-252
1.4.89	Kathryn Jacobson and Paul Cooke .....	1.4-254
1.4.90	TJ .....	1.4-256
1.4.91	Mary and Robert Perry .....	1.4-258
1.4.92	Shirley Randall .....	1.4-260
1.4.93	Courtne Hayson.....	1.4-262
1.4.94	Bert Johnson .....	1.4-264
1.4.95	Chris Straub .....	1.4-268
1.4.96	Douglas Brown.....	1.4-270
1.4.97	Josh Islas.....	1.4-272
1.4.98	Maureen Soderberg.....	1.4-274
1.4.99	Steve Strachan .....	1.4-276
1.4.100	Carolyn Christiansen .....	1.4-278
1.4.101	Steve LeBard .....	1.4-280
1.4.102	Salvador Melendez II.....	1.4-285
1.4.103	Adolph Sherer.....	1.4-288
1.4.104	Susan Wilson .....	1.4-292
1.4.105	Carla and Ken Canby.....	1.4-295
1.4.106	Scott and Cathy Wells .....	1.4-297
1.4.107	Felix Diaz .....	1.4-299
1.4.108	Tara Diaz .....	1.4-301

1.4.109 Pam Gates .....	1.4-304
1.4.110 Allicia King .....	1.4-311
1.4.111 Constance King.....	1.4-320
1.4.112 Vance and Jerrilyn Matzke.....	1.4-323
1.4.113 Andrew Oman.....	1.4-325
1.4.114 Katy Rogers .....	1.4-327
1.4.115 Eric Wilson.....	1.4-331
1.5 Volume 2 References.....	1.5-1

## **Appendices**

Appendix A.	Supplemental Traffic Analyses
Appendix B.	Santa Barbara Local Agency Formation Commission Policy Consistency Analysis
Appendix C.	Monarch Butterfly Technical Memoranda
Appendix D.	Santa Barbara County Policy Consistency Analysis
Appendix E.	Supplemental CalEEMod Analyses

## **Tables**

Table 1.1-1. Master Responses .....	1.1-1
Table 1.2-1. Agency Comments .....	1.2-1
Table 1.3-1. Non-Agency Organization Comments .....	1.3-1
Table 1.4-1. Public Comments.....	1.4-1



# CHAPTER 1. RESPONSE TO COMMENTS ON THE 2022 DRAFT EIR

This chapter of the Environmental Impact Report (EIR) presents responses to comment letters that were received on the 2022 Draft EIR for the Richards Ranch Annexation Project (project). These comment letters were received from multiple entities, including state and local agencies, non-agency organizations, and the public. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132(d), this Final EIR presents the City of Santa Maria (City) response to comments submitted during the Draft EIR review and consultation process.

A set of Master Responses has been developed to address certain topical issues raised multiple times by different commenters. These Master Responses are provided in Section 1.1 and referenced throughout the chapter.

The comment documents (letters and emails) are organized by grouping (agency, non-agency organizations, and public) and then in chronological order. Comment documents received by the City are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. Responses follow the individual letters and emails.

## 1.1 MASTER RESPONSES

Many comments submitted raised similar concerns. The following responses are master responses intended to address all the comments submitted in relation to these areas of concern. All individual responses set out in the following sections related to comments regarding one of these areas of concern are referred back to the appropriate master response to avoid unnecessary length and duplication in this document.

**Table 1.1-1. Master Responses**

Master Response #	Master Response
MR-1	<p><b>Public Services – Emergency Services</b></p> <p>Section 4.12, Public Services and Recreation, provides an evaluation of the project’s potential impacts related to public services and recreation, including fire protection services and police protection services. Section 4.12.1.1 discusses the condition of existing fire protection services in the project area, including services provided by the Santa Maria Fire Department (SMFD) and the Santa Barbara County Fire Department (SBCFD).</p> <p>The SMFD responds to emergency services calls via their dispatch center and determines which unit(s) to send out depending on the location of the incident and daily conditions. Given the geographic location of fire stations through the city and community of Orcutt, SMFD and SBCFD rely on their mutual aid agreements to provide fire protection services across each organization’s jurisdictional boundaries when needed. This reciprocal arrangement allows for provision of adequate fire protection services and emergency response times within the region. The agencies’ commitment to the mutual aid agreement is documented in the Cooperative Dispatch Agreement between the Santa Barbara County Fire Protection District and the City of Santa Maria as well as through the City’s California Master Mutual Aid Agreement outlined in the General Plan’s Safety Element.</p> <p>As discussed in Section 4.12.5, Project-Specific Impacts and Mitigation Measures, average response times from SMFD Stations 2 and 4 to the project site would exceed the performance goal response time due to station location and distance from the project site. However, the SBCFD Station 21 is located 1.7 miles southwest of the project site and is within the goal 4-minute travel time response for first responders (Emergency Services Consulting International 2021). Discussions with both SMFD and SBCFD confirmed that between the two departments and through mutual aid, there are adequate facility locations to serve the project site (SMFD 2022); however, response times to the project site are less than ideal under current conditions from the SMFD location. This is largely because the closest SMFD station, the Santa Maria Airport Fire Station 6, currently has very limited equipment and staffing and cannot serve emergencies</p>

Master Response #	Master Response
	<p>outside of the airport property. However, the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport. As of April 2024, funding has been received to equip Station 6 with a fire engine and provide additional staff (a captain, engineer, and firefighter). This staffing is expected to occur in the later summer 2024; at that time, SMFD Station 6 will be fully operational to serve areas of the city and county beyond the airport property (SMFD 2024).</p> <p>Implementation of the project as shown in the conceptual site plan would result in the construction of up to 495 multi-family units, 106,800 square feet of commercial uses, and a 39,500-square foot mini-storage complex, resulting in an estimated increase of 1,846 new residents as well as employees and patrons of new commercial-retail development. This would result in an increase in demand for existing fire protection services at the project site of an estimated 180 to 200 calls per year (SMFD 2022). However, given that SMFD currently employs 71 full-time fire employees, well above their standard of providing one full-time fire employee per 1,820 persons, the increase in population would not result in the need for additional fire personnel and would not significantly impact SMFD's firefighter-to-population ratio.</p> <p>Implementation of the project would result in the annexation of the project site into the City of Santa Maria, including changing the service area boundary so that the project site would be within the jurisdictional boundary of SMFD rather than SBCFD. As well, as part of the annexation process, the City would need to develop a Resolution of Application to Initiate Annexation, including Adoption of a Plan for Services. The Plan for Services would identify how the City and SMFD would serve the project site using available facilities. If the Santa Barbara County Local Agency Formation Commission (SBLAFCO) provides approval of the annexation, the County and City would move to a negotiation process to identify a fair and appropriate Property Tax Sharing Agreement. It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined.</p> <p>As noted above and in Section 4.12.5, Project-Specific Impacts and Mitigation Measures, there are adequate facility locations to serve the project site (SMFD 2022); however, response times to the project site from the SMFD location are less than ideal under current conditions. Because of this current condition, under mutual aid agreements, the SBCFD Fire Station 21 would be the most likely first responder in most emergency situations at the project site under current conditions. However, the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport. SMFD Station 6 at the Santa Maria location will be fully operational to serve areas of the city and county beyond the airport property in late summer 2024 (SMFD 2024). When fully staffed at Fire Station 6, the SMFD would be more apt to pick up most of the emergency calls and be the first responder to the project site. Under either scenario, the project would not necessitate the requirement of new or physically altered fire facilities.</p> <p>As discussed in Section 4.12.5, Project-Specific Impacts and Mitigation Measures, the SMPD is not currently meeting the City's RME objective of 1.3 sworn police officers per 1,000 residents and the proposed project would create an additional demand on police services by increasing population and facilities within the city limits. However, the SMPD has determined that they have adequate facilities and personnel to serve the project as proposed (Silva 2022). While the City is striving to reach the RME objective, police patrols and response times are well within an adequate service level and the SMPD can provide police service to the project as proposed (Silva 2022). As well, the City's Capital Projects budget includes funds budgeted for additional fleet expansion as well as technician vehicles (City of Santa Maria 2020). The project site would also be provided with police protection as needed by the County of Santa Barbara Sheriff's Office through similar mutual aid agreements as discussed for fire protection services. The California Highway Patrol also provides patrols along State Route (SR) 135 as part of the Santa Maria patrol area and has reciprocal agreements with SMPD and SBCPD to provide mutual assistance in emergency situations. The project would not trigger the need for new or expanded police facilities. In addition, the project would allow for up to 106,800 square feet of commercial retail space, which would generate local transactions and use tax through the City's approved Measure U, directly supporting the City's police protection services.</p> <p>The EIR concludes that the project would not require the provision of new or physically altered fire or police protection facilities; therefore, environmental impacts were determined to be less than significant.</p> <p>Potential environmental impacts associated with the provision of emergency services have been adequately assessed in the EIR; no revisions to the EIR are necessary.</p>
MR-2	<p><b>Public Services – School Facilities</b></p> <p>Section 4.12, Public Services and Recreation, evaluates the project's potential impacts related to public services and recreation, including existing school facilities. Section 4.12.1.3 identifies the condition of existing schools in the project area. Three school districts serve the city of Santa Maria and its Sphere of Influence—the Santa Maria-Bonita School District, the Orcutt Union School District (OUSD), and the Santa Maria Joint Union High School District (SMJUHSD). The project site is located within the boundaries of the OUSD (serving grades K–8), and the SMJUHSD (serving grades 9–12). There is an estimated enrollment of 4,133 students within OUSD (Orcutt Union School District 2022). The SMJUHSD has an estimated enrollment of 9,257 students (SMJUHSD 2022). The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>



Master Response #	Master Response
	<p>Patterson Road Elementary is located approximately 0.55 miles south of the project site, Orcutt Junior High School is located approximately 1 mile southwest of the project site, and Ernest Righetti High School is located approximately 0.9 miles northeast of the project site. As described in Section 4.13, Transportation, there are existing bicycle lanes and pedestrian facilities within the project area and the Santa Maria Bikeways Master Plan identifies future bicycle and pedestrian improvements, including a new shared use pathway within the project area. Therefore, the project area would allow residents, including students, to use designated trails and pedestrian facilities to travel to other areas of the city. As such, there would be opportunities for students to use alternative modes of transportation to travel to designated school sites.</p> <p>Based on current enrollment and school capacity data available for the 2021–2022 school year, Patterson Road Elementary School is at 81% capacity, Orcutt Junior High School is at 75% capacity, and Ernest Righetti High School is over capacity at 145%. As described in Section 4.12.5, the proposed project would contribute up to 116 elementary school students, 38 middle school students, and 100 high school students for a total of 254 new students at OUSD and SMJUHSD schools upon project buildout. These estimates are based on the Developer Fee Justification Study reports from March 2022 that were provided by both school districts.</p> <p>As stated in Section 4.12.5, the project would be subject to the payment of state-mandated impact mitigation fees to offset the increased demand for school services by providing funding for additional facilities to serve the area. Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998) states that payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Based on Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), additional mitigation is not required to reduce impacts related to an increase in demand on public schools. These fees would be used at the discretion of the school districts to provide additional facilities and resources, including classroom facilities, staff, school buses, etc. to serve students. The development of school facilities is necessarily up to the school districts and their projected need for the facilities.</p> <p>After the Draft EIR was published, the EIR consultant, on behalf of the City, reached out to both OUSD and SMJUHSD to determine if additional information was available to predict the need and location of future additional facilities. No additional information was provided. As such, it would be speculative to identify the location of future facilities that would serve the students from the Richards Ranch. The SMJUHSD indicated that SMJUHSD must accommodate the students generated by the project and would do so at Ernest Righetti High and that additional classrooms and support services would be needed at the school site to accommodate the project's student generation. However, SMJUHSD indicated that, due to the unknown timeline for project approval and fluctuations in students and timeline, identifying the exact needs would be speculative (SMJUHSD 2023). OUSD did not provide any supplemental information after several attempts by the EIR consultant to contact them for supplemental information.</p> <p>As recently upheld in <i>Santa Rita Union School District v. City of Salinas</i> (2023) Cal.App.5th Court of Appeal, where information from school districts is uncertain and/or vague there is not an ability to further analyze the potential indirect impacts of future school facility development. These effects cannot be further analyzed or responded to per State Guidelines Section 15145. The school districts have not provided any substantial evidence or information regarding future school sites or any reasonably foreseeable indirect environmental impacts of providing school facilities on existing or future school sites.</p> <p>Therefore, in conjunction with other plans and funding sources used by the school districts, the payment of the state-mandated impact mitigation fees would ensure that the effects of the project on the provision of school services would be less than significant. Based on the information provided in the Draft EIR and this supplemental information, potential environmental impacts associated with the provision of public school facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p>
MR-3	<p><b>Transportation</b></p> <p>Section 4.13, Transportation, of the EIR evaluates the project's potential impacts to the transportation system within the project area consistent with guidance provided by CEQA, the State CEQA Guidelines, and Senate Bill (SB) 743. SB 743 requires that the analysis of transportation impacts under CEQA promote the following: (1) the State's goals in reducing greenhouse gas emissions and traffic-related air pollution, (2) the development of a multimodal transportation system, and (3) clean and efficient methods of travel. Section 4.13 is based, in part, on the <i>Updated Traffic and Circulation Study</i> (Traffic and Circulation Study) prepared for the project by Associated Transportation Engineers (ATE). The Traffic and Circulation Study addresses the requirements of CEQA and SB 743 as well as roadway and intersection operations, including level of service (LOS). It is important to note that, with the passage of SB 743, intersection operations and roadway capacity analyses are generally outside of the scope of CEQA. However, these analyses can be important to local Lead Agencies when considering whether to approve or deny a project and when considering policy consistency analyses, General Plan consistency, and project development permit conditions of approval.</p> <p>As described on page 4.13-1, the roadways within the project area that were evaluated as part of the Traffic and Circulation Study include U.S. Highway 101 (US 101), State Route (SR) 135, Union Valley Parkway (UVP), Orcutt Road, Foxenwood Lane, Foster Road, and Hummel Drive. The description of roadway and</p>

Master Response #	Master Response
	<p>access improvements that are included in the project is described in the EIR in Chapter 2, Project Description. The detail of the roadway improvements included in the project is provided in Table 2-4, <i>Roadway and Transportation Improvements Included in the Richards Ranch Project</i>. Appendix B of the 2022 Draft EIR (herein referred to as EIR Volume 1) provides schematic drawings of the planned circulation and transportation improvements included in the project description. The project would be accessed from Orcutt Road and UVP; no public vehicular access would be allowed from Dancer Avenue. The frontage of Orcutt Road along the commercial sites would be widened and sidewalks and bike lanes would be provided. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project.</p> <p>It should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only. Several comments received during the public review period of the Draft EIR express concern about traffic increasing on Mooncrest Lane, which is directly south of the project site and would only be logically accessed from Dancer Avenue. However, because Dancer Avenue would not be used for public vehicular access with implementation of the project, automobile trips on Mooncrest Lane would not increase because of project development. Public automobile access to the site would only occur from Orcutt Road and UVP.</p> <p>Pedestrian connections would be provided between the sidewalks on UVP and the proposed retail uses/buildings as well as between the sidewalks on UVP and the proposed residential buildings. The project as depicted in the conceptual site plan would incorporate the inclusion of two city public transit bus stops as part of its design strategy to improve accessibility to public transportation. These bus stops are strategically positioned to encourage greater usage of public transit, aiming to reduce the reliance on individual vehicles and consequently lower the overall vehicle miles traveled (VMT) associated with the project. This project element required for future development of the site is geared towards providing convenient alternatives for commuters and promoting a more sustainable transportation approach to reduce VMT impact.</p> <p>The Traffic and Circulation Study determined that implementation of the project would result in a total of 20,780 average daily trips, including 1,452 AM peak trips and 1,751 PM peak trips (ATE 2022). EIR Tables 4.13-5 and 4.13-6 summarize the Cumulative + Project LOS that would result with implementation of the project, including consideration of the signalization and improvements at UVP and Hummel Drive. As shown by the analysis, with the improvements at the UVP and Hummel Drive intersection, all interactions would operate within the City's acceptable LOS operational criteria with implementation of the project. In summary, the Traffic and Circulation Study determined that the project would not result in a substantial increase in vehicle congestion along roadways within the project area.</p> <p>The EIR also considers whether the project would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), which describes specific considerations for evaluating a project's transportation impacts (EIR Volume 1, Section, 4.13, Transportation, page 4.13-12). As directed by the State CEQA Guidelines and consistent with SB 743, VMT is the most appropriate measure of transportation impacts. Generally, a project's effect on automobile delay does not in-and-of-itself constitute a significant environmental impact. The Traffic and Circulation Study and the EIR used the National Cooperative Highway Research Program (NCHRP) Report 684, "Enhancing Internal Trip Capture Estimation for Mixed-Use Developments" to estimate the internal mixed-use trips for the project. This report provides industry-standard procedures for developing mixed-use traffic adjustments. The NCHRP 684 report defines mixed-use projects as follows:</p> <p style="padding-left: 40px;">Mixed-Use Development: For the purposes of this project, it has been deemed appropriate and necessary to expand this definition to include multi-use developments. A multi-use development is a real estate project of separate uses of differing and complementary, interacting land uses that do not necessarily share parking and may not be internally interconnected except by public street and/or other public transportation facilities.</p> <p>The OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) provides the following guidance for analyzing VMT generated by mixed-use projects: For mixed-use projects, the CEQA Guidelines recommend either analyzing each component of the proposed project separately or focusing on the predominant land use. Because the proposed project is a mixed-use project with no dominating land use, potential VMT-related impacts were evaluated by analyzing VMT for each component of the project separately. Based on the analysis provided in the Traffic and Circulation Study and represented in the EIR in Section 4.13, Transportation, the proposed project would not generate VMT in a manner that would exceed state or local thresholds; therefore, the project would not conflict with or be inconsistent with State CEQA Guidelines Section 15064.3(b). Further, although not required to reduce VMT-related impacts, Mitigation Measure GHG/mm-2.1 identifies project design measures to promote alternate transportation modes, which would further reduce VMT generated by the project. Therefore, impacts related to VMT would be less than significant.</p> <p>Another criterion of significance that is considered in the EIR is whether the project would substantially increase hazards due to a geometric design feature. As evaluated in the EIR (EIR Volume 1, Section, 4.13, Transportation, page 4.13-14), the conceptual design plan for the project includes the construction of new access driveways from Orcutt Road and UVP, a new access road from Orcutt Road, and an internal roadway</p>

Master Response #	Master Response
	<p>system. The project would be required to comply with City, County, and Caltrans requirements and other applicable engineering standards for driveways and access roads to reduce potential hazards related to roadway design. As detailed in the Traffic and Circulation Study and the supplemental analysis, with the planned intersection configuration and the provision of traffic signals at the UVP and Hummel Drive intersection, the project would not cause substandard or hazardous operating conditions at this intersection. Following buildout of the project, proposed driveways would have less than two vehicles in queue and would operate between LOS A and LOS C, which is consistent with City thresholds (ATE 2022). In addition, sight distances and driveways would be required to meet Caltrans' minimum sight distance standard of 430 feet at all driveways for the 50 mile per hour speed limit on UVP. Therefore, the Traffic and Circulation Study and EIR did not identify any significant roadway hazards associated with implementation of the project.</p> <p>Regarding access and safety, several comments and concerns were raised by the County of Santa Barbara Public Works Department Transportation Division (SBPWT) during the Draft EIR comment period (see the Response to Comments on the 2022 Draft Environmental Impact Report [herein referred to as EIR Volume 2], Chapter 1, page 1.2-81). Several of SBPWT's comments focused on potential safety concerns related to uncontrolled left turns and other design features represented in the conceptual site plan. If they were to be approved, the proposed applications for annexation and a General Plan Amendment and Rezone would not result in development of the site immediately upon approval. For the annexation proposed by the Applicant to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to SBLAFCO for approval as a Responsible Agency. If the SBLAFCO were to approve the annexation, development of the project would require individual Planned Development Permit applications. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA. Because the development permits for the project are not yet being considered, the uncertainty in project timing, and that these factors do not affect the CEQA analysis or conclusions, the City will not be determining the exact internal circulation at this juncture. More detail regarding internal design features and the supplemental analyses that were conducted to response to SBPWT's comments is provided in response to comments SBPWT-1 through SBPWT-32 later in this Section. In addition, EIR Volume 2, Appendix A provides supplemental traffic analysis information to support the responses to SBPWT's comments.</p> <p>The supplemental traffic analyses that were conducted between circulation of the Draft EIR and publication of this Final EIR resulted in clarifications and confirmations related to the traffic analysis contained in the Draft EIR. The modifications to EIR Section 4.13, Transportation, and the provision of the supplemental analysis in response to SBPWT's comments do not constitute "significant" new information because no additional substantial environmental effect of the project has been identified, nor has the severity of an environmental impact been increased. Further, the conclusions of the analysis do not differ significantly from the Traffic and Circulation Study that supported the Draft EIR and was circulated as Draft EIR Appendix C (see EIR Volume 1, Appendix C). Lastly, there has been no evidence provided which demonstrates that the traffic analysis contained in the Draft EIR was inadequate or conclusory in nature. Therefore, when considering the Traffic and Circulation Study and EIR Section 4.13, Transportation, none of the conditions for recirculation of the Draft EIR analysis, as specified above in State CEQA Guidelines 15088.5, have been met.</p>
MR-4	<p><b>Airport Hazards</b></p> <p>At the time the Draft EIR was prepared, the most recent adopted airport land use plan for the Santa Maria Airport was the Santa Barbara County Airport Land Use Plan (ALUP), which was adopted in 1993. The Draft EIR included both an analysis of the project's consistency with this adopted plan, as well as the Draft Santa Maria Airport Land Use Compatibility Plan (ALUCP), which, at the time the Draft EIR was developed, had not yet been adopted. Sections of the Draft EIR that included information on both the 1993 ALUP and the Draft ALUCP are 4.1, Aesthetics, 4.7, Hazards and Hazardous Materials, 4.9, Land Use and Planning, and 4.10, Noise. In January 2023, after the Draft EIR was published, the Santa Barbara County Association of Governments (SBCAG) adopted the Santa Maria ALUCP. All relevant discussion and figures in the EIR have been updated to reflect the adoption of this plan, including the project's consistency with the policies identified therein pertaining to noise, safety, airspace protection, and overflight.</p> <p>The proposed project includes an annexation of the project site into the City of Santa Maria. Accordingly, the County of Santa Barbara Orcutt Community Plan (OCP) would not be applicable to the project site if the annexation and project were to be approved. The OCP, published in 1997, identified a "No Build Zone" based on the 1993 ALUP. The mapped runway alignments and associated safety zones for the Santa Maria Airport identified in the 1993 ALUP have since been superseded by the Santa Maria ALUCP. Based on the Santa Maria ALUCP, there is no designated "No Build Zone" or similar equivalent designation identified by SBCAG that restricts development in the area identified by the OCP other than the mapped Safety Zones and noise contours, which are described in detail in EIR Sections 4.7 Hazards and Hazardous Materials, 4.9 Land Use and Planning, and 4.10 Noise. Therefore, the OCP No Build Zone is not relevant nor is it applicable to the project.</p> <p>Section 4.10, Noise, evaluates the project's potential impacts on the existing ambient noise environment and is based, in part, on the <i>Noise and Groundborne Vibration Impact Assessment</i> prepared for the project (AMBIENT Air Quality &amp; Noise Consulting [AMBIENT] 2022c). The compatibility of proposed land uses with</p>

Master Response #	Master Response
	<p>aircraft noise were assessed based on the most current noise contours available for the Santa Maria Airport (Santa Barbara County Association of Governments 2017). The airport noise contours were developed considering multiple factors, including (but not limited to) the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered "less than significant." It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports.</p>
<p>MR-5</p>	<p><b>Non-Substantive Comments</b></p> <p>Pursuant to CEQA Guidelines Section 15132, Contents of Final Environmental Impact Report, and Section 15088, Evaluation of and Response to Comments, the Final EIR shall consist of the response of the Lead Agency to significant environmental issues raised in the review and consultation process.</p> <p>Substantive comments typically do one or more of the following:</p> <ul style="list-style-type: none"> <li>• question, with reasonable basis, the accuracy of information in the EIR;</li> <li>• question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis;</li> <li>• present new information relevant to the analysis;</li> <li>• present reasonable alternatives other than those analyzed in the EIR; and/or</li> <li>• cause changes or revisions in one or more of the alternatives.</li> </ul> <p>In cases where the comment does not raise a substantive issue relevant to the environmental analysis, detailed responses are not warranted. Non-substantive comments for the purpose of the Final EIR typically include statements of opinion or preferences regarding a project's design or its presence as opposed to points within the purview of the EIR: environmental impact and mitigation. These points are relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not warrant revisions to the EIR or preparation of detailed responses in the Final EIR.</p>
<p>MR-6</p>	<p><b>Water Supply</b></p> <p>Section 4.14, Utilities and Service Systems, of the EIR discusses the project's potential impacts on utilities and service systems, including water supply. This section is based, in part, on the Richards Ranch Final Water Supply Assessment (Todd Groundwater 2022). As described, the project site is located within the Golden State Water Company (Golden State Water) Orcutt Service area and would be provided water by Golden State Water. Based on the Golden State Water Orcutt service area population projections and anticipated land use types, the current and projected water demand for the service area is estimated to reach 6,776 acre-feet per year (AFY) in 2045 (Tully and Young 2021). This estimated water demand comes from the projected development of vacant and/or underdeveloped lands within the Orcutt service area, which is based on the land use planning documents and designations adopted for each jurisdiction (i.e., the City of Santa Maria and the County of Santa Barbara) in place at the time the Orcutt Service Area Urban Water Management Plan (UWMP) was developed. Golden State Water's Orcutt service area water supply comes from California State Water Project (SWP) water, SWP return flows, groundwater pumping, and supplemental water from the City (Todd Groundwater 2022).</p> <p>The project is subject to the supplemental water requirement pursuant to the Court-adopted Stipulation in <i>Santa Maria Valley Water Conservation District v City of Santa Maria, et al.</i> (and related actions), Lead Case No. CV 770214, Superior Court of the State California, County of Santa Clara, in January 2008, and Commission Decision No. 13-05-011. Therefore, a source of supplemental water to offset the increased water demand must be provided. Golden State Water does not currently have any available supplemental water to serve the project. Therefore, the project would be required to identify and secure a source of supplemental water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The decision to provide supplemental water is at the discretion of the City of Santa Maria. In the past, the City has elected to not provide supplemental water to proposed commercial development on the Richards Ranch site. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. A formalized agreement for the provision of supplemental water by the City of Santa Maria would be required before annexation. The City has a standard supplemental water agreement that is used to provide supplemental water to Golden State Water when the City determines it is appropriate. Prior to the supplemental water agreement being finalized, the City Council would need to adopt a Resolution of Application to Initiate Annexation, including</p>



Master Response #	Master Response
	<p>Adoption of a Plan for Services (Resolution), which would occur after EIR certification. If the Resolution is approved by the City Council, then the supplemental water agreement would be developed in draft form. This would occur prior to, and included within, the application for review and consideration of approval of the proposed annexation, which would be submitted to the SBLAFCO to initiate annexation proceedings. The supplemental water agreement would only be finalized if annexation were to be approved by SBLAFCO.</p> <p>Golden State Water calculated water demand for the project depicted in the conceptual site plan consistent with their methodology to estimate the supplemental water needed to serve the project (Todd Groundwater 2022). The annual water demand for the project is approximately 149.05 acre-feet per year.</p> <p>As shown in EIR Tables 4.14-3 through 4.14-5 on pages 4.14-3 through 4.14-4, Golden State Water's lowest available water supply would be 11,000 AFY during the single dry year and second and third multiple dry year conditions. The highest available water supply would be 11,423 AFY during normal conditions. Therefore, Golden State Water has adequate water supply to serve its existing and projected population.</p> <p>The project depicted in the conceptual site plan would allow for the future development of approximately 131,100 square feet of commercial development, including a retail center, a gas station, a drive-through restaurant, and a mini storage facility and 495 multi-family units, including 400 apartments and 95 townhomes. Table 4.14-8 in the EIR shows that full buildout of the proposed project would have an estimated water demand of 103.94 AFY at full buildout around the year 2026, which would result in a total water demand between 6,209 and 6,371 AFY at the time of full project buildout between the years 2025 to 2030 (Todd Groundwater 2022). Based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. In addition, the total estimated water demand of the Orcutt service area in 2045 would be 6,880 AFY. Therefore, Golden State Water would have adequate water supply to serve the future demands of the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023). Therefore, the EIR determines that Golden State Water would have sufficient water supply to serve the water demand generated by the proposed project and the existing service area during normal, single dry year, and multiple dry years conditions.</p> <p>The exact timing of the provision of water infrastructure would be determined during Planned Development Permit application review. Typically, infrastructure is included with the overall grading and site improvements associated with a project. The required utility connections would be in place before final occupancy clearance is given by the City.</p> <p>Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. As such, economic impacts associated with Golden State Water costs have not been evaluated in the EIR. The City does not have visibility into the specifics of Golden State Water's rate structure. As a general matter, Golden State Water's ability to extend water service to new customers is done pursuant to California Public Utilities Commission's approved rules and regulations applicable to Golden State Water. As indicated in Golden State Water's Can and Will Serve Letter for the project, all costs associated with improvements to or new main extensions, water supply, water storage and any additional water appurtenances would be paid by the Applicant and contributed to Golden State Water. Further, Golden State Water would provide water service to the project, under the same terms and conditions as its existing customers.</p> <p>Potential impacts associated with water supply have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p>
MR-7	<p><b>Recreation – Parks and Open Space</b></p> <p>Section 4.12, Public Services and Recreation, evaluates the project's potential impacts related to public services and recreation, parks, and open space. As described therein, the City provides 235.8 net acres and 262.7 total acres of parkland. The City's Recreation and Parks Leisure Needs Assessment and Action Plan (Leisure Needs Assessment) also includes 35.2 acres of Waller Park—operated by the County of Santa Barbara—in its existing parks inventory based on the number of city residents that use the County-operated facility (City of Santa Maria 2019). With the inclusion of 35.2 acres of Waller Park, the City provides a total of 271 acres of parkland. According to the City's Resource Management Element (RME), the City's objective for provision of parkland is 3 to 5 acres for every 1,000 residents (City of Santa Maria 1996). With the portion of Waller Park, the City currently provides a total of 271 acres of developed parkland, resulting in approximately 2.5 acres of parkland per every 1,000 residents, which is less than the City's objective. In addition to City-owned and -operated facilities, the County of Santa Barbara Parks and Recreation also operates and maintains 10 day-use parks and eight open space areas in the North County portion of Santa Barbara County, within close proximity to the project site.</p> <p>As discussed in Section 4.12.5 of the EIR, the project would result in an estimated increase of 1,846 new residents as well as employees and patrons of new commercial-retail development over an anticipated 3-year buildout, introducing a new resident population that would increase the demand on existing park and recreational facilities. As shown in EIR Tables 4.12-3 and 4.12-4, the City provides 27 community and neighborhood parks totaling approximately 236 acres as well as a 1,778-acre regional open space park (Los</p>

Master Response #	Master Response						
	<p>Flores Ranch Park) within approximately 8 miles of the project site; the County provides over 806 acres of day-use parks, open space, and recreational facilities within 5 miles of the project site. In addition, the project would include several internal park areas intended for use by future residents. Given the amount of nearby park and recreational facilities as well as the inclusion of park areas on-site, future population growth associated with the project would not result in the substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities.</p> <p>As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Park and open space areas within the project site would be considered as part of the overall project development and would not result in physical impacts on the environment outside of those described in this EIR. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 11-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p> <p>Potential environmental impacts associated with the provision of public park facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p>						
MR-8	<p><b>Annexation and Economics</b></p> <p>As identified in Chapter 2, Project Description, of the EIR, the project site is adjacent to the southeastern Santa Maria city limits and lies within the City's Sphere of Influence (SOI), which is a planning boundary outside of an agency's legal boundary (such as the city limit line) that designates the agency's probable future boundary and service area. Therefore, the annexation of this site is accounted for by the City. The County's OCP (1997) identifies the project site as "Key Site 26 (Richards),". The site is currently zoned Retail Commercial (C-2) with the underlying land use designations for commercial, office and professional, and residential, which is consistent with the conceptual project components.</p> <p>As described in Chapter 2, Project Description, the Santa Maria City Council would be required to certify the EIR, approve pre-zoning of this property, and adopt a Resolution to Initiate Annexation to the City. The City would then negotiate a tax exchange agreement with the County and complete the annexation application and review process with SBLAFCO. If SBLAFCO approves annexation of the project site into the city of Santa Maria, the City would process and review future entitlements and related development permits such as planned development permits, tentative maps, and building plans for future development proposals within the project site at the time future development applications are received.</p> <p>Section 4.9, Land Use and Planning, discusses the project's consistency with SBLAFCO standards related to favorable and unfavorable factors for annexations into cities (see Section 4.9.2.4 and Table 4.9-4 of the EIR). These are repeated below.</p> <table> <tr> <th colspan="2">SBLAFCO Standards for Annexations to Cities and Analysis of the Project Against Them</th></tr> <tr> <th>LAFCO Standard</th><th>Analysis of the Proposed Richards Ranch Annexation</th></tr> <tr> <td> <p><b>Factors Favorable to Approval:</b></p> <ol style="list-style-type: none"> <li>1. Proposal would eliminate islands, corridors, or other distortion of existing boundaries.</li> <li>2. Proposed area is urban in character or urban development is imminent, requiring municipal or urban-type services.</li> <li>3. Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.</li> <li>4. Proposal is consistent with the adopted spheres of influence and adopted general plans.</li> </ol> </td><td> <p><b>Potentially Consistent with Mitigation.</b></p> <ol style="list-style-type: none"> <li>1. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create an island or distort existing boundaries.</li> <li>2. The project site is surrounded by existing urban development and under the Santa Barbara County Land Use and Development Code, the site is zoned Commercial (C-2), which is applied to provide retail business and commercial land uses for the residents of the surrounding community. The County's C-2 zone also allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200).</li> </ol> </td></tr> </table>	SBLAFCO Standards for Annexations to Cities and Analysis of the Project Against Them		LAFCO Standard	Analysis of the Proposed Richards Ranch Annexation	<p><b>Factors Favorable to Approval:</b></p> <ol style="list-style-type: none"> <li>1. Proposal would eliminate islands, corridors, or other distortion of existing boundaries.</li> <li>2. Proposed area is urban in character or urban development is imminent, requiring municipal or urban-type services.</li> <li>3. Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.</li> <li>4. Proposal is consistent with the adopted spheres of influence and adopted general plans.</li> </ol>	<p><b>Potentially Consistent with Mitigation.</b></p> <ol style="list-style-type: none"> <li>1. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create an island or distort existing boundaries.</li> <li>2. The project site is surrounded by existing urban development and under the Santa Barbara County Land Use and Development Code, the site is zoned Commercial (C-2), which is applied to provide retail business and commercial land uses for the residents of the surrounding community. The County's C-2 zone also allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200).</li> </ol>
SBLAFCO Standards for Annexations to Cities and Analysis of the Project Against Them							
LAFCO Standard	Analysis of the Proposed Richards Ranch Annexation						
<p><b>Factors Favorable to Approval:</b></p> <ol style="list-style-type: none"> <li>1. Proposal would eliminate islands, corridors, or other distortion of existing boundaries.</li> <li>2. Proposed area is urban in character or urban development is imminent, requiring municipal or urban-type services.</li> <li>3. Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.</li> <li>4. Proposal is consistent with the adopted spheres of influence and adopted general plans.</li> </ol>	<p><b>Potentially Consistent with Mitigation.</b></p> <ol style="list-style-type: none"> <li>1. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create an island or distort existing boundaries.</li> <li>2. The project site is surrounded by existing urban development and under the Santa Barbara County Land Use and Development Code, the site is zoned Commercial (C-2), which is applied to provide retail business and commercial land uses for the residents of the surrounding community. The County's C-2 zone also allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200).</li> </ol>						

Master Response #	Master Response
	<p>5. Request is by an agency for annexation of its publicly owned property, used for public purposes.</p> <p>3. As described in Section 4.14, Utilities and Service Systems, the project would require expanded utility infrastructure, including potable water, wastewater, stormwater, and other utilities, such as natural gas, electricity, telephone, and cable/data service. Future development of the project site would require a full range of onsite infrastructure improvements as well as several improvements that would be necessary outside of the boundaries of the 43.75-acre project site. These improvements have been scaled to provide acceptable levels of service for full buildout of the project site, using the proposed conceptual development plan as a guide.</p> <p>4. The project has been designed to be consistent with the adopted SOI and would be consistent with the goals and policies in the City's General Plan with implementation of mitigation measures identified in this EIR.</p> <p>5. The project is not publicly owned property, therefore this factor is not applicable.</p>
<p><b>Factors Unfavorable to Approval:</b></p> <ol style="list-style-type: none"> <li>1. Proposal would create islands, corridors, or peninsulas of city or district area or would otherwise cause or further the distortion of existing boundaries.</li> <li>2. The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.</li> <li>3. For reasons of topography, distance, natural boundaries, or like considerations, the extension of services would be financially infeasible, or another means of supplying services by acceptable alternatives is preferable.</li> <li>4. Annexation would encourage a type of development in an area which due to terrain, isolation, or other economic or social reason, such development is not in the public interest.</li> <li>5. The proposal appears to be motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.</li> <li>6. Boundaries of proposed annexation do not include logical service area or are otherwise improperly drawn.</li> <li>7. The proposal is inconsistent with adopted spheres of influence and adopted general plans.</li> </ol>	<p><b>Potentially Consistent with Mitigation.</b></p> <ol style="list-style-type: none"> <li>1. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create an island or distort existing boundaries.</li> <li>2. The project site is surrounded by existing urban development and under the Santa Barbara County Land Use and Development Code, the site is zoned Commercial (C-2), which is applied to provide retail business and commercial land uses for the residents of the surrounding community. The County's C-2 zone also allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200).</li> <li>3. The project would require new connections to proximate existing utility infrastructure. These improvements have been scaled to provide acceptable levels of service for full buildout of the project site, and would not require a significant and/or cost-prohibitive expansion of infrastructure.</li> <li>4. The project site is located in the City of Santa Maria's SOI and would allow for the future development of local community-serving commercial retail land uses, as well as allow for the future development of a mix of housing types that would help the City meet its RHNA.</li> <li>5. Based on available information and preliminary inter-agency coordination efforts, the project is not motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.</li> <li>6. The project would not change existing service boundaries for water or wastewater services.</li> <li>7. The project has been designed to be consistent with the adopted SOI and would be consistent with the goals and policies in the City's General Plan with implementation of mitigation measures identified in this EIR.</li> </ol>
<p>In addition, EIR Volume 2, Appendix B provides a preliminary analysis of the project's consistency with SBLAFCO policies and factors identified in SBLAFCO's comments on the Draft EIR, dated March 6, 2023. The analysis provided in EIR Volume 2, Appendix B supplements EIR Section 4.9.2.4 and EIR Table 4.9-4. Table 4.9-4 lists applicable plans and policies pertaining specifically to land use and planning that were "adopted for the purpose of avoiding or mitigating an environmental effect and a preliminary evaluation of the</p>	

Master Response #	Master Response
	<p>project's consistency with the guidelines and requirements detailed therein." This approach is consistent with the State CEQA Guidelines Section 15125(d) and the environmental checklist questions in Appendix G of the State CEQA Guidelines. The CEQA interest in policy consistency is narrower than the consideration of the analysis of policy consistency that is required for the annexation to be successfully approved by the City and the SBLAFCO Commission.</p> <p>As determined in the EIR, the project would be consistent with the SBLAFCO standards for favorable factors for annexations into cities.</p> <p>Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts.</p> <p>Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR. No revisions to the EIR are necessary.</p>
MR-9	<p><b>Air Quality and Greenhouse Gas Emissions</b></p> <p>Section 4.2, Air Quality and Greenhouse Gas Emissions discusses the project's potential impacts associated with air quality and greenhouse gas (GHG) emissions. This section is based, in part, on the Air Quality and Greenhouse Gas Impact Assessment prepared for the Richards Ranch Project (AMBIENT 2022a; EIR Volume 1, Appendix E).</p> <p>As discussed in Section 4.2, a significant impact related to air quality would occur if the proposed project would conflict with an applicable air quality plan, result in a cumulatively considerable net increase in criteria air pollutants above applicable standards, expose sensitive receptors to substantial pollutant concentrations, or result in odors that may affect a substantial number of people. A significant impact related to GHGs would occur if the proposed project would generate GHG emissions that exceed established Santa Barbara County Air Pollution Control District (SBCAPCD) thresholds or conflict with a plan, policy, or regulation related to GHG emissions. Air quality and GHG emissions associated with the construction of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Project construction is anticipated to occur over an approximately 36-month period beginning in 2024 and would be short-term in nature. Short-term activities refer to activities that would not occur over the life of the project. With regard to construction activities, activities that occur in less than five years are typically considered to be short term. Construction of proposed land uses was assumed to require grubbing (removal of brush/trees), site preparation, grading, building construction, paving, and application of architectural coatings. Project-generated emissions were evaluated in accordance with SBCAPCD recommended methodologies and significance thresholds.</p> <p>As shown in EIR Table 4.2-5, the maximum annual unmitigated construction-generated emissions would total approximately 2.19 tons per year of ROG and 5.13 tons per year of NO<sub>x</sub>, and would not exceed the SBCAPCD threshold of 25 tons per year for combined ROG and NO<sub>x</sub>. Santa Barbara County currently is in non-attainment for the state standard for PM<sub>10</sub>. As such, dust control measures are required for all projects that require earthmoving activities, regardless of the significance of the fugitive dust impacts. Mitigation Measures AQ/mm-2.1 and AQ/mm-2.2 require the implementation of dust control measures and mobile-source PM reduction measures to be implemented during project construction. Operational emissions would not exceed established SBCAPCD thresholds. Although not necessary to reduce operational emissions, implementation of Mitigation Measure GHG/mm-2.1 identified in Impact GHG-2, would further reduce long-term operational air emissions. It should be noted that some mitigation measures include the language "where locally available" because hauling in reclaimed water or a specific piece of equipment from other areas of the state can potentially generate more emissions than using what is locally available. The mitigation measures included in the EIR are feasible and would ensure compliance with SBCAPCD thresholds; therefore, potential environmental impacts were determined to be less than significant with the incorporation of mitigation.</p> <p>Construction of the proposed project would result in an increase in GHG emissions from vehicle and equipment use and associated energy consumption. Long-term GHG emissions would primarily be generated by operational vehicle trips to and from the project site and building energy use. A locally appropriate GHG efficiency significance threshold used for this analysis is based on Senate Bill 32 GHG emission reduction goals, which take into consideration the emission reduction strategies outlined in ARB's Scoping Plan. The efficiency threshold was calculated based on ARB's GHG emissions inventory identified in the 2017 Climate Change Scoping Plan Update. Emissions sectors that do not apply to the proposed project (i.e., agriculture) were excluded from the calculation to create a locally-appropriate emissions target</p>

Master Response #	Master Response
	<p>for the City of Santa Maria. As shown in EIR Table 4.2-8, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 6,079.3 MTCO<sub>2</sub>e per year for the year 2027. Under 2030 operating conditions, GHG emissions would total approximately 5,751 MTCO<sub>2</sub>e per year. Based on an estimated service population of 2,331, the calculated GHG efficiency for the proposed project, without mitigation, would be 2.61 MTCO<sub>2</sub>e per service population per year in 2027 and 2.47 MTCO<sub>2</sub>e per service population per year in 2030. Therefore, GHG emissions generated by the proposed project would not exceed the 2030 efficiency threshold of 3.4 MTCO<sub>2</sub>e per service population per year.</p> <p>Therefore, the EIR determines that impacts related to GHG emissions would be less than significant. Mitigation Measures EN/mm-1.1, GHG/mm-2.1, and GHG/mm-2.2 have been included to further reduce construction-related and operational GHG emissions and ensure consistency with the Santa Barbara County Association of Governments (SBCAG) <i>Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy</i> (2050 RTP/SCS) and California Air Resources Board (CARB) 2017 Climate Change Scoping Plan.</p> <p>Potential impacts associated with air quality and GHG emissions have been adequately analyzed in the EIR, and no revisions to the EIR are necessary.</p>
MR-10	<p><b>Aesthetics</b></p> <p>Specific design plans for the project have not been submitted to the City given the current application is solely for consideration of a General Plan Amendment, Rezone, and annexation of the project site to the City of Santa Maria. The timing of the development application is not currently known; consideration of the development application would only occur if annexation was to be approved by the City and then subsequently by the SBLAFCO. However, a conceptual plan for future development of the project site has been prepared for the project to facilitate analysis of potential environmental impacts of the eventual development of the project site if the proposed annexation and pre-zoning were to be approved. The conceptual plan shows the potential future development that could occur consistent with the project's proposed pre-zone designations.</p> <p>As addressed in Section 4.1, Aesthetics, the project site is not located within a designated scenic vista or within the viewshed of a designated or eligible State Scenic Highway. The County has identified both SR 135 and UVP as public view corridors that provide prominent views of the area (County of Santa Barbara 2022). As identified in the EIR, the existing visual character of the project site predominantly includes a vacant, relatively flat area covered with low-lying non-native grasses and scattered native scrub vegetation. Two large non-native eucalyptus windrows and numerous individual eucalyptus trees are present mostly along the south side and north side of UVP frontage, and along the eastern border of the project site north of UVP. Section 4.1 of the EIR discloses that future build-out of the proposed project would include the removal of all or most of the existing vegetation on-site to accommodate development that would result in a notable change in the existing visual character of the project site by inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along SR 135, UVP, Orcutt Road, Hummel Drive, Mooncrest Lane, and other public roadways.</p> <p>As presented in Section 4.10, Noise, to reduce long-term exposure to the effects of noise, noise walls are recommended in Mitigation Measure NOI/mm-1.2. These barriers would be located on the north side of the proposed commercial uses, between the proposed commercial uses and residences to the north, as well as along the proposed residential uses adjacent to Orcutt Road and UVP. The aesthetic effects of these proposed noise barriers have also been considered in Section 4.1, Aesthetics.</p> <p>The project, including the pre-zoning of the project site to PD/C-2 for retail commercial and PD/R-3 for high density residential as shown in the conceptual development plan, would be consistent with the existing and proposed zoning and land use designations. Any proposed future development at the project site would be required to adhere to the guidance set forth in City Municipal Code Section 12-39 for design review, ensuring height and setback requirements are met and all structures are visually complementary to surrounding uses. Additionally, City Municipal Code Section 12-44 provides landscape standards to ensure the installation of landscape features that provide the appropriate buffers to soften views of new buildings. With adherence to the City's development and landscape standards, project implementation would not substantially degrade the existing visual character or quality of public views of the project site and its surroundings, nor conflict with applicable zoning and other regulations governing scenic quality. Therefore, the EIR determines that the project would result in less-than-significant impacts related to aesthetic resources.</p> <p>Potential impacts associated with aesthetic resources have been adequately analyzed in the EIR. Additional information has been added to the analysis contained in Section 4.1, Aesthetics, to specifically address the proposed noise barriers recommend in Mitigation Measure NOI/mm-1.2. These additions to the analysis do not change the conclusions of the EIR; instead, these textual additions to the EIR clarify that no additional aesthetics impacts would occur with the construction or the recommended noise barriers. No further revisions to the EIR are necessary to adequately consider aesthetics consistent with CEQA, the State CEQA Guidelines, and CEQA case law.</p>

Master Response #	Master Response
MR-11	<p data-bbox="394 289 610 310"><b>Biological Resources</b></p> <p data-bbox="394 329 1369 375">Section 4.3, Biological Resources, provides the evaluation of the project's potential impacts to biological resources.</p> <p data-bbox="394 388 1401 579">Following the release of the Draft EIR, new information was obtained regarding the monarch butterfly (<i>Danaus plexippus</i>) and overwintering habitat for the species. Specifically, the Xerces Society and the California Department of Fish and Wildlife (CDFW) have identified the stand of eucalyptus trees along the southern side of Union Valley Parkway as a Western Monarch Overwintering Site (mapped as #2688, 7.63 acres). Further, the CDFW has indicated that this eucalyptus grove is an important inland overwintering grove of the monarch butterfly and that it has high conservation value (CDFW 2023). Based on this new information presented by CDFW, the City revised its findings regarding the existing 7.63-acre overwintering site that is within the project site boundaries.</p> <p data-bbox="394 592 1406 783">Because of the new information provided, revisions to the recommended mitigation measures for the monarch butterfly were warranted. Also, the conclusion regarding the impacts following implementation of the mitigation measures required revision. As presented in Section 4.3, Biological Resources, it is now concluded that removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. While the City has determined that feasible mitigation measures are not available to reduce impacts to a less-than-significant level, several mitigation measures have been identified in Mitigation Measure BIO/mm-2.1, which would be required to address the significant impact to the extent feasible and reasonable.</p> <p data-bbox="394 795 1411 966">In order to develop and inform the measures specified in Mitigation Measure BIO/mm-2.1, the City conducted additional research to identify opportunities for monarch butterfly habitat conservation activities appropriate for the impact, given poor health and lack of long-term viability of the existing grove on-site.<sup>1</sup> These efforts included identifying the organizations that could be considered as recipients of conservation funding to offset impacts to the monarch butterfly habitat that would be caused by the project. EIR Volume 2, Appendix B includes this technical analysis prepared by SWCA (SWCA 2024), as well as an additional technical letter from the Applicant's biologist, which provides some additional preliminary input (DWE 2024).</p> <p data-bbox="394 978 1382 1024">The complete mitigation measure is provided in Section 4.3 of the EIR; the specific elements of Mitigation Measure BIO/mm-2.1 are the following:</p> <ol style="list-style-type: none"> <li data-bbox="443 1037 1411 1104">a. If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration period (October 15 through February 29).</li> <li data-bbox="443 1117 1411 1308">b. If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration period (October 15 through February 29), a City-approved biologist familiar with monarchs and monarch overwintering habitat shall conduct focused surveys for monarch colonies within the identified overwintering site and will identify any colonies found within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until the City-approved biologist determines monarch butterflies are no longer using the trees for overwintering.</li> <li data-bbox="443 1320 1411 1535">c. To provide further protection to non-overwintering populations and/or adjacent over-wintering populations, no <i>Asclepias curassavica</i> (tropical milkweed) will be allowed in any planting palettes for the project. Native milkweed species, such as <i>Asclepias fascicularis</i> (narrowleaf milkweed) are also not recommended by the USFWS to be planted adjacent to existing overwintering sites as this may interfere with normal migrating behavior (USFWS 2023b). To contribute to local monarch butterfly conservation efforts, native nectar-providing plant species will be incorporated into landscaping following construction activities, such as those recommended in the Monarch Butterfly Nectar Plant List for Conservation Plantings, to enhance local nectar sources (Xerces Society 2018).</li> </ol> <p data-bbox="492 1562 1414 1680">In addition, as a condition of approval for the Planned Development permit(s), the use of neonicotinoids and synthetic pesticides shall be prohibited in the initial project plantings and throughout the life of the project in open space, pocket parks, and other common landscaped areas. This condition shall apply to the common open spaces for the life of the project and shall be included in the CC&amp;Rs which will be recorded against the property prior to the issuance of a first</p>

<sup>1</sup> The primary trees included in the Richards Ranch on-site monarch overwintering habitat area have been previously cut down and have resprouted resulting in multi-trunk trees. In eucalyptus, these trunk sprouting forms have branches with a weak attachment that can fail in high winds and are hazards to public safety. This grove is not currently maintained and it not expected to have long-term viability. The existing grove at the project site supports an overwintering population of up to 30 monarch butterflies (0–30 based on Western Monarch Count Viewer between 2015 and 2021), average of 13.9 per year. The existing grove is not maintained and would not be maintained in the absence of the project. For these reasons, the existing grove at the Richards Ranch site that provides monarch butterfly overwintering habitat is not sustainable and will likely, ultimately, be lost.

Master Response #	Master Response
	<p>certificate of occupancy. In addition, Future residents and occupants shall be encouraged to not used neonicotinoids, synthetic pesticides, and/or plants treated with these materials; residents and occupants will be provided educational materials describing 1) viable alternatives to these products, and 2) the detrimental effects of these products on butterflies and other pollinators.</p> <p>d. Prior to the approval of a Planned Development permit and prior to the removal of any trees within the overwintering site, the developer shall hire a City-approved biologist familiar with monarchs and monarch overwintering habitat to prepare and implement a monarch butterfly habitat enhancement plan. At a minimum, the plan shall identify area(s) on the property appropriate for onsite habitat enhancement to partially address the direct impacts of tree removal. The recommendations in this plan shall be included within the project's future project's landscaping plans for review and approval by the City prior to implementation.</p> <p>e. Prior to the approval of the first building permit for the project, the developer, in consultation with the City of Santa Maria Community Development Department, shall identify and provide a donation to a Qualified and Suitable Conservation Entity for monarch habitat conservation that can receive financial support to further enhance and/or promote conservation efforts in the region. A Qualified and Suitable Conservation Entity is defined as a conservation or government organization that:</p> <ul style="list-style-type: none"> <li>i. Has an established preserve in Santa Barbara or San Luis Obispo Counties within the ecological range of overwintering monarch butterfly that is dedicated to conservation purposes and is actively managing lands or resources for conservation in Santa Barbara or San Luis Obispo County;</li> <li>ii. Has specific experience and/or land holdings with monarch butterfly and their habitats; and</li> <li>iii. Can specifically identify at least 7.6 acres of habitats within their preserve(s) to be managed or enhanced as regionally significant monarch overwintering habitat within the Santa Barbara or San Luis Obispo County area.</li> </ul> <p>The developer shall provide a donation in an amount required by the Suitable Conservation Entity to fund 5 years of conservation research, restoration, site protection, and/or maintenance and management activities to the benefit of overwintering monarch butterfly habitat. Examples of funding opportunities would be for use in maintenance of existing grove trees, exotic species control, native grove tree planting and/or replacement of eucalyptus trees with native tree species, planting of understories with native plant communities, general grove habitat maintenance, and/or qualitative and quantitative monitoring efforts over a 5-year period. These efforts may also contribute to improving scientific studies on monarch butterflies and their conservation in the city and/or Santa Barbara or San Luis Obispo County.</p> <p>A copy of the final executed agreement between the developer and the Qualified and Suitable Conservation Entity shall be submitted to the City prior to the City's issuance of the first building permit for the Richards Ranch project.</p> <p>Even with the application of the efforts and conservation support outlined in Mitigation Measure BIO/mm-2.1, residual impacts to monarch butterflies would continue to be significant and unavoidable with development of the proposed project. Development of the project site under the conceptual development plan or any project of a similar density would necessitate the removal of the 7.63-acre monarch overwintering site (mapped as #2688) that exists on the project site. Impacts cannot not be fully mitigated because there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while potential created or restored overwintering habitat matures. For these reasons, while mitigation is available through supporting existing conservation efforts of established habitats that are actively managed by qualified conservation entities, the City determines that feasible mitigation measures are not available to fully reduce potentially significant impacts to the monarch butterfly from loss of habitat to a less-than-significant level. Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with the buildout of the conceptual development plan or of a project on the project site that is similar in density.</p> <p>Regarding other potentially significant biological resource impacts, as discussed in Section 4.3 of the PRDEIR and this Final EIR, a significant impact related to biological resources would occur if the proposed project would result in the temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species. Special-status species include those that have been designated as rare, threatened, or endangered, as well as those which are candidate species for listing. Section 4.3.1.6 Special-Status Plant Species and 4.3.1.7 Special-Status Wildlife Species discuss these designations in more detail. Based on the special-status species assessment, it was determined that two additional special-status wildlife species (northern California legless lizard, and western red bat) and nesting migratory birds and raptors could potentially occur on the project site (DWE 2022). Other common species are known to use the project site; however, the project site is generally surrounded by urban residences and the SR 135 corridor. As such, it has been concluded that minimal quality habitat for locally common wildlife species is provided by the project site.</p>



Master Response #	Master Response
	<p>Section 4.3 concludes that direct and indirect impacts of project construction to biological resources would be significant due to the potential impacts to special-status species, as discussed below. The impacts described in the following bullets, however, can be mitigated to less-than-significant levels with the mitigation measures identified in the EIR.</p> <ul style="list-style-type: none"> <li>• The potential for direct and indirect impacts to northern California legless lizard during construction of the project would be significant. The sandy soils on the project site and remnants of disturbed coastal scrub represent suitable habitat for the northern California legless lizard. Construction activities such as grading and other excavation could result in direct impacts, loss of habitat, and mortality.</li> <li>• Direct and indirect impacts to nesting birds and raptors during construction of the project would be significant. All the vegetation onsite has the potential to support nesting birds. If the trees or other vegetation were removed while birds were nesting, the nesting individuals could be directly or indirectly impacted by the vegetation removal. The potential for direct impacts may include physically destroying an active nest and the nest's occupants. Indirect impacts may include excessive noise or movement causing nest abandonment.</li> <li>• The potential for direct and indirect impacts to roosting western red bats during construction of the project would be significant. The eucalyptus trees onsite have the potential to support roosting western red bats. If bats were roosting in the trees at the time the trees were removed, the bats could be directly impacted by the tree removal. Impacts to bats could include disrupting a maternal roost, loss of roosting habitat, and/or crushing or otherwise physically harming individuals.</li> </ul> <p>As a result of these impacts, the project would be required to implement several mitigation measures to minimize direct and indirect impacts to special-status species during project construction. Most mitigation measures would result in biological impacts being reduced to less than significant. Specifically, Mitigation Measures BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-5.1, and BIO/mm-11.1, potential impacts to special-status species during project construction would reduce the associated impacts to less than significant with mitigation.</p>
MR-12	<p><b>Noise</b></p> <p>Section 4.10, Noise, evaluates the project's potential impacts on the existing ambient noise environment and is based, in part, on the <i>Noise and Groundborne Vibration Impact Assessment</i> prepared for the project (AMBIENT 2022c; EIR Volume 1, Appendix J).</p> <p>To document existing ambient noise levels in the project area, short-term ambient noise measurements were conducted on April 6, 2022, using a Larson Davis Laboratories, Type I, Model 820 integrating sound-level meter. The meter was calibrated before use and is certified to be in compliance with Acoustical National Standards Institute (ANSI) specifications. Ambient noise levels within the project area are predominantly influenced by vehicle traffic on roadways within the area. To a lesser extent, birds and the occasional airplane overflight also contribute to the ambient noise environment.</p> <p>Daytime average-hourly noise levels in the project vicinity ranged from the mid-40s to high-60s (in dBA <math>L_{eq}</math>), with the highest ambient noise occurring approximately 25 feet south of UVP and the lowest ambient noise occurring near the south end of Mitchell Drive. Long-term Measurement L-1 was taken near the northeastern boundary of the project site, approximately 90 feet from the edge of UVP. Noise levels at this location were primarily affected by vehicle traffic on UVP. Measured average-hourly noise levels ranged from approximately 54.7 dBA <math>L_{eq}</math> during the nighttime hours to approximately 68.3 dBA <math>L_{eq}</math> during the daytime hours. Measured nighttime noise levels were approximately 13 dBA lower than the highest measured daytime noise level. The measured average-daily noise level was 68.86 dBA CNEL, which includes the penalties applied to the more noise-sensitive evening and nighttime hours. Long-term measurement LT2 was taken near the southwest boundary of the proposed residential development, approximately 54 feet east of Orcutt Road and 43 yards east of SR 135. Noise levels at this location were primarily affected by vehicle traffic on SR 135 and Orcutt Road. Measured average-hourly noise levels at LT2 ranged from approximately 48.7 dBA <math>L_{eq}</math> during the nighttime hours to approximately 67.6 dBA <math>L_{eq}</math> during the daytime hours. Measured nighttime noise levels were approximately 5 to 19 dBA lower than the highest measured daytime noise level. The measured average-daily noise level, including penalties applied to the more noise-sensitive evening and nighttime hours, was 65 dBA CNEL.</p> <p>Section 4.10 of the EIR includes a description of the methodology for determining short-term construction-related noise, traffic noise, and operational noise associated with the project. Short-term noise impacts associated with construction activities were analyzed based on typical construction equipment noise levels and distances to the nearest noise-sensitive land usage. Noise levels were predicted based on representative off-road equipment noise levels derived from the Federal Highway Administration's (FHWA's) Roadway Construction Noise Model based on average equipment usage rates and assuming a noise-attenuation rate of 6 decibel (dB) per doubling of distance from the source.</p> <p>The compatibility of proposed land uses with aircraft noise were assessed based on the most current noise contours available for the Santa Maria Airport (Santa Barbara County Association of Governments, 2017). The airport noise contours were developed considering multiple factors, including (but not limited to) the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus</p>

Master Response #	Master Response
	<p>night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the 1.1-15 projected 65 dBA CNEL noise contour. For these reasons, this impact was considered "less than significant." It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports.</p> <p>Traffic noise levels were calculated using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) based on California vehicle reference noise levels and traffic data obtained from the traffic analysis prepared for this project. Noise levels associated with vehicle parking areas were calculated in accordance with Federal Transit Authority's Transit Noise and Vibration Impact Assessment Guidelines (2018) assuming a reference noise level of 92 dBA sound-exposure level. Noise levels generated by other onsite noise sources, including onsite building mechanical equipment, loading docks, HVAC (heating, ventilation, and air conditioning) units, car wash, and drive-through operations, were assessed based on representative manufacturer and measured data obtained from similar sources. Predicted noise levels associated with onsite sources were compared to the City's noise standards for non-transportation noise sources.</p> <p>As stated on pages 4.10-23 and 4.10-24, construction activities would not exceed screening noise criteria for construction noise recommended by federal agencies; however, construction activities would have the potential to result in temporary exceedances of the maximum acceptable noise levels for residential land uses set forth in the City's Municipal Code. Mitigation Measure NOI/mm-1.1 would reduce construction-related noise levels by limiting construction activities to less noise-sensitive periods of the day and requiring the use of mufflers and other best practices. Implementation of the identified noise-reduction measures would reduce construction equipment noise levels by approximately 10 dBA. With implementation of Mitigation Measure NOI/mm-1.1, the EIR determines that the project would not result in short-term noise impacts.</p> <p>Buildout of the proposed project as depicted in the conceptual development plan would result in the construction of retail commercial, mini-warehouse, and housing uses. Full buildout of land uses on the project site with the development and uses shown in the conceptual development plan would be anticipated to generate a total service population of 2,331 and approximately 20,780 daily trips (Associated Transportation Engineers [ATE] 2022). Long-term, permanent increases in ambient noise levels would be primarily associated with potential increases in vehicle traffic on nearby roadways as well as onsite activities. Mitigation Measure NOI/mm-1.2 has been identified to avoid long-term noise impacts through the installation of a noise barrier and other site design and noise-reduction features to reduce noise levels associated with the commercial-use heating, ventilation, and HVAC units; commercial-use loading docks; drive-through restaurant; car wash; and commercial-use mechanical equipment. Predicted increases in traffic noise levels along area roadways, including UVP, were calculated for existing and future cumulative conditions. In comparison to existing and future cumulative conditions, the proposed development would result in less than a 1 dB increase in predicted traffic noise levels along UVP and would not exceed established thresholds. With incorporation of Mitigation measures NOI/mm-1.1 and NOI/mm-1.2, the operational components of the project would not exceed City of Santa Maria noise standards.</p> <p>Potential impacts associated with noise have been adequately analyzed in the EIR, and no revisions to the EIR are necessary.</p>
MR-13	<p><b>Pollution</b></p> <p>As discussed in Section 4.2 of the EIR, the buildout of the project site as shown in the conceptual development plan has the potential to increase air pollutant emissions during construction and operational activities. Mitigation Measures AQ/mm-2.1 and AQ/mm-2.2 identify dust control measures and mobile-source PM reduction measures to be implemented during project construction. Estimated daily operational emissions from all sources of ROG, NO<sub>x</sub>, and PM<sub>10</sub> would not exceed the SBCAPCD operational thresholds. Although not necessary to reduce operational pollutant emissions, implementation of Mitigation Measures GHG/mm-2.1 and GHG/mm-2.2 would further reduce long-term operational emissions through implementation of measures to promote the use of alternative means of transportation, installation of electrically powered appliances and building mechanical equipment in place of natural gas-fueled equipment, installation of EV-ready parking spaces, to prohibit the installation of new natural gas connections in residential development, and to provide direct GHG emission reductions and carbon offsets for any use of natural gas at the commercial land uses. Based on the information currently available, the proposed project would not include the installation of major stationary sources of TACs and no major sources of toxic air contaminant (TACs) have been identified in the project area. Refer to MR-9, which includes additional information on air quality and GHG emissions.</p> <p>Future construction of residential and commercial land uses within the project site would be required to comply with California Green Building Standards Code (CALGreen) Sections 4.408 and 5.408, which require the diversion of at least 65% of the waste generated during construction. In accordance with the requirements of Senate Bill 1383 for organic waste disposal, the City would provide residents and</p>

Master Response #	Master Response
	<p>businesses in the project site with green waste bins for diversion of organic materials. In addition, the City would provide project site tenants with recycling bins for the diversion of recyclable materials. Per Assembly Bill 341, multi-family homes and commercial businesses would be required to implement a recycling program and participate in local recycling collection services. The project's solid waste generation of 1.94 tons per day would equate to approximately 13.58 tons of solid waste per week, which would represent a negligible amount of the Santa Maria Regional Landfill's permitted disposal rate of 6,006 tons per week. Therefore, there would be adequate services and landfill capacity to serve the proposed project, which would avoid the potential to increase waste and pollution from waste disposal.</p> <p>Mitigation Measures HYD/mm-1.1 and HYD/mm-1.2 have been included in the EIR to ensure compliance with the Regional Water Quality Control Board (RWQCB) Construction General Permit requirements, including preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) with best management practices (BMPs) to address stormwater and other pollutants at the project site during construction activities. Mitigation Measure HYD/mm-2.1 through HYD/mm-2.3 have been identified to ensure compliance with the Central Coast RWQCB post-construction stormwater management requirements, in accordance with the Post-Construction Stormwater Management Resolution R3-2013-0032 and the City's Stormwater Guidance Document. During construction and operation, the project would be required to comply with California Code of Regulations (CCR) Title 22 and Health and Safety Code Division 20, Chapter 6.95, which would avoid or minimize the potential for risk to the public due to improper handling of hazardous materials. In addition, Mitigation Measures HAZ/mm-2.1 and HAZ/mm-2.2 have been identified to avoid disturbance of aerially deposited lead if present in soils at the project site. Therefore, mitigation has been incorporated to address other short- and long-term pollutants. Potential impacts associated with pollution have been adequately analyzed in the EIR, and no revisions to the EIR are necessary.</p>
MR-14	<p><b>Utilities and Infrastructure – Electricity, Natural Gas, Energy, Wastewater, Stormwater, Solid Waste</b></p> <p>Other utility infrastructure, including electricity, natural gas, water supply, wastewater treatment, local landfills, and stormwater are discussed in Section 4.5, Energy, Section 4.14, Utilities and Service Systems, and Section 4.8, Hydrology and Water Quality. As discussed in Section 4.14, the 43.75-acre project site is currently undeveloped. The western portion of the project site is crossed in a north-south direction by Orcutt Road and the central portion of the project site is crossed in an east-west direction by UVP. There is an existing natural gas line located within the portion of Orcutt Road and UVP that runs through the project site. There is an existing 10-inch asbestos concrete water line, an existing 12-inch ductile iron pipe water line, and an existing electrical line located along the western property boundary. No existing sewer lines are located within the project site; however, they are very close to the project site. Figure 4.14-3 shows existing utility infrastructure at and near the project site. The project would require expanded utility infrastructure, including potable water, wastewater, stormwater, and other utilities, such as natural gas, electricity, telephone, and cable/data service that would be placed underground within the footprint of the project site and/or under nearby roadways. Specifically, proposed onsite water delivery infrastructure would include an internally looped system of 8-inch public water main line, which would provide potable water and fire suppression water supplies within the project site. Off-site improvements would include Golden State Water Company water system improvements, including main/system upgrades under Orcutt Road and UVP. Sewer connections required for the project include a connection at the Laguna County Sanitation District (LCSD) sewer manhole ID MH1010, located near the northwest corner of the project site in Orcutt Road (adjacent to the driveway of the property located at 4174 Orcutt Road). LCSD wastewater system improvements would include upsizing the existing downstream sewer pipe from a 6-inch-diameter pipe to an 8-inch-diameter pipe from MH1010 to Foster Road (approximately 675 feet of pipeline).</p> <p>Construction and installation of new and expanded utility infrastructure would have the potential to result in various environmental impacts. However, these potential impacts are typical of a construction project within the city, have been analyzed and addressed by the environmental analyses contained in the EIR, and can be reduced to less than significant levels with the mitigation measure identified in the EIR. Further, construction and implementation of the infrastructure improvements that are required beyond the 43.75-acre project site would occur within existing roadway rights-of-way in areas that have been previously disturbed as a result of previous roadway construction. With adherence to applicable state and local regulations and implementation of identified mitigation measures, potential impacts related to proposed construction of new or expanded utility infrastructure would be less than significant with mitigation.</p> <p>The exact timing of the provision of infrastructure would be determined during Planned Development Permit application review. Typically, infrastructure is included with the overall grading and site improvements associated with a project. The required utility connections would be in place before final occupancy clearance is given by the City.</p> <p>Section 4.5, Energy, of the EIR evaluates the project's potential impacts associated with energy use, including electricity and natural gas. This section of the EIR is based, in part, on the Energy Impact Assessment prepared for the proposed project (AMBIENT 2022b). The project site's electricity infrastructure and distribution would be provided by Pacific Gas and Electric Company, likely in conjunction with Central Coast Community Energy. Southern California Gas Company would provide natural gas distribution to the project site. As shown in EIR Table 4.5-3, the project would result in the consumption of energy resources associated with electricity, water use (i.e., water pumping, heating, etc.), and natural gas. In total, the</p>

Master Response #	Master Response
	<p>proposed facilities would consume an annual total of approximately 26,075 MMBTU (AMBIENT 2022b). As discussed in Section 4.5, the development of increasingly efficient building fixtures would result in increased energy efficiency and energy conservation. Further, the project would be subject to energy conservation requirements Title 24, Part 6, of the CCR, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and CALGreen (24 CCR Part 11). Mitigation Measure EN/mm-1.1 has been identified to require the implementation of additional energy efficiency measures to ensure the project would be consistent with the State's goal of achieving carbon neutrality by year 2045, per the CARB's <i>Draft 2022 Climate Change Scoping Plan Update</i> and EO B-55-18. In addition, implementation of Mitigation Measures GHG/mm-2.1 and GHG/mm-2.2 would further reduce operational energy consumption through the implementation of design features (i.e., pedestrian-friendly streetscape, pedestrian and bicycle facilities, interconnected bicycle routes/lanes, bicycle parking, electric vehicle parking spaces) to promote the use of alternative modes of transportation, prohibit the use of new natural gas connections in residential development, and provide direct GHG emission reductions and carbon offsets for any use of natural gas at the commercial land uses. Therefore, the EIR determines that impacts related to energy use would be less than significant.</p> <p>Section 4.14, Utilities and Service Systems evaluates the project's impacts on utilities and service systems, including wastewater treatment facilities. As described, the project's wastewater service needs would be provided by the LCSD. Wastewater from the project would be collected through the LCSD's sewer collection system and would be treated at the wastewater reclamation plant (WWRP). Full buildout of the project would result in approximately 134,265 gpd of wastewater flows that would be collected and treated by LCSD. The <i>2019 Sewer Collection System Master Plan</i> (Sewer System Master Plan) defines the future growth scenario for the LCSD service area as the development of Key Sites identified in the County of Santa Barbara OCP (LCSD 2019). The project site is identified as Key Site 26 (Richards Ranch) in the OCP; therefore, the increase in wastewater flows from buildout of this site has been accounted for in the Sewer System Master Plan. In addition, the LCSD has provided a letter in May 2022, stating that the LCSD has adequate treatment and discharge capabilities to serve the project, and wastewater flows resulting from buildout of future residential and commercial land uses onsite would not result in effluent produced by the LCSD WWRP to exceed RWQCB standards (LCSD 2022). Therefore, the EIR determines that impacts related to wastewater generation would be less than significant.</p> <p>Section 4.8, Hydrology and Water Quality, evaluates the project's impacts on stormwater. As described, the project would have the potential to increase stormwater flows at the project site. During construction, the project would be required to develop and implement a SWPPP in accordance with the RWQCB Construction General Permit. These requirements have been included as Mitigation Measures HYD/mm-1.1 and HYD/mm-1.2 to ensure proper timing and that the requirements be included on construction plans. Following construction, the project would be covered in hardscapes that would increase the amount of impervious surface area on-site and could contribute to an increase in operational stormwater discharges. The project includes the construction of stormwater infrastructure in accordance with the City's Public Improvement Standards. Further, the project would be subject to Central Coast RWQCB post-construction stormwater management requirements, in accordance with the Post-Construction Stormwater Management Resolution R3-2013-0032 and the edition of the City's Stormwater Guidance Document that is current at the time that development permits are being sought. These requirements have been included as Mitigation Measures HYD/mm-2.1 through HYD/mm-2.3 to ensure inclusion of locally appropriate stormwater BMPs in the final design of the stormwater quality system, and to ensure that the stormwater quality system is maintained for long-term operation. With incorporation of the identified mitigation, the EIR determines that impacts related to stormwater generation would be less than significant.</p> <p>Section 4.14, Utilities and Service Systems, evaluates the project's impacts on utilities and service systems, including local landfills. As described, solid waste from the project would be disposed of at Santa Maria Regional Landfill, which is anticipated to reach capacity and cease operations in January 2028 (CalRecycle 2021). The Santa Maria Regional Landfill has a maximum disposal rate of 6,006 tons per week. The project's solid waste generation of 1.94 tons per day would equate to approximately 13.58 tons of solid waste per week, which would represent a negligible amount of the Santa Maria Regional Landfill's permitted disposal rate of 6,006 tons per week. Therefore, the EIR determines that impacts related to solid waste generation would be less than significant.</p> <p>Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Therefore, economic impacts associated with utility costs and fees have not been included in the EIR.</p> <p>Potential impacts associated with electricity, natural gas, energy, wastewater, stormwater, and solid waste have been adequately analyzed in the EIR, and no revisions to the EIR are necessary.</p>

Master Response #	Master Response
MR-15	<p data-bbox="394 289 854 310"><b>Population Growth and Other Public Services</b></p> <p data-bbox="394 331 1419 669">As discussed in Section 4.11, Population and Housing, based on the 2050 Regional Growth Forecast (SBCAG 2019), there is a projected decrease in City growth rates over time, with a projected annual growth rate of 0.9% from 2025 to 2040 and 0.3% between 2040 and 2050 (SBCAG 2018). The City could expect the addition of 10,000 new residents between 2020 and 2025, and 5,700 new residents each between 2025 and 2030, and 2030 and 2035 (EIR Table 4.11-2). This would increase Santa Maria's regional population share from 24% to 27% by 2050. Based on the 2050 Regional Growth Forecast, Santa Maria is forecast to have the most significant change in number of households in Santa Barbara County over the 2017 to 2050 period, with a 15,308 household increase (a 53% increase) compared to the County's 38,000 household increase (a 26% increase) (EIR Table 4.11-3; SBCAG 2019). SBCAG anticipates that population growth will continue to occur in the region, and the city will have a higher growth rate than the county over time. Population growth projections show Santa Maria's population increasing by an average growth rate of 1.7% through 2025, 0.9% between 2025 and 2040, and slowing to a 0.3% growth rate between 2040 and 2050. The city's population is projected to add 31,200 people between 2020 and 2050 for a final population of 143,100 (see EIR Table 4.11-2).</p> <p data-bbox="394 680 1414 800">The project is expected to generate new population growth on-site by facilitating the construction of up to 495 multi-family units and 106,800 square feet of commercial retail uses. This development would potentially increase population within the city by 1,846 residents (EIR Table 4.11-6). The project is expected to be complete in 2025, so the project would increase the city's population by approximately 1.5% over the 2025 level of 121,900 (U.S. Census Bureau 2022).</p> <p data-bbox="394 810 1406 978">Population growth is considered significant only if it is unplanned or unanticipated by the City. The project site is located in the City's sphere of influence (SOI). According to the City's Land Use Element (adopted 1991, as amended in 2011), the SOI is "the probable 20-year boundary of the City," as approved by the Local Agency Formation Commission (City of Santa Maria 2011). The City expects to annex the land currently within its SOI. Under Objective L.U. 5b, the City intends to implement an annexation program to encourage growth within its SOI (City of Santa Maria 2011). As such, probable growth within the project site has been accounted for in the City's General Plan Land Use Element.</p> <p data-bbox="394 989 1398 1083">The total increase in population under the project would be well below the projected population under the SBCAG by 2050, which plans for a future additional population of 31,200 (from 111,900 in 2020 to 143,100 in 2050; see EIR Table 4.11-2). Therefore, population increases resulting from the project would remain within planned growth under the SBCAG growth projections.</p> <p data-bbox="394 1094 1409 1310">Additionally, Section 4.12, Public Services and Recreation, provides an evaluation of the project's potential impacts related to public services and recreation, including fire protection, police protection, schools, libraries, and parks. The project would be subject to payment of the City's growth mitigation fees as required by City Municipal Code Section 8-15 to provide funding for facilities as needed, which would offset the project's increased demand on public facilities. These fees provide for the funding of acquisition, design and construction of public facilities and related equipment necessary to serve new development within the City. As discussed in Section 4.13, Transportation, the project includes future development near existing transit stops, bicycle lanes, and pedestrian facilities, which allow residents to use alternative modes of transportation to travel to other areas of the city for commercial and other services.</p> <p data-bbox="394 1320 1403 1467">It should be noted that for or any future new City facilities determined to be necessary to service the future city population, the City would be required to consider the environmental effects of those facilities in compliance with CEQA. The potential for future facilities has been addressed in the EIR based, in part, on thorough conversations with City staff service providers. While other future facilities not identified in the EIR could be required many years in the future, these future facilities do not have known timelines or locations, and analyzing the environmental effects of the municipal projects would be speculative.</p> <p data-bbox="394 1478 1419 1572">Therefore, the project would be consistent with local plans and policies and would not result in unplanned growth in a manner that could result in a substantial or unplanned increase in demand on other existing public facilities. Potential impacts associated with population and housing and the provision of public facilities have been adequately analyzed in the EIR; no revisions to the EIR are necessary.</p>
MR-16	<p data-bbox="394 1593 501 1614"><b>Hydrology</b></p> <p data-bbox="394 1635 1419 1898">Section 4.8, Hydrology and Water Quality, evaluates the project's impacts on hydrology and water quality in the project area. As described, the existing topography of the project site is generally flat and drains in sheet flow to the northeast. No natural drainage or surface water features are present on the project site and the project site is not located within an identified flood zone. The EIR concludes that the alteration of drainage patterns is not anticipated to result in flooding on- or off-site because the project site would likely be graded to maintain its natural flat grade. During construction, the project would be required to develop and implement a SWPPP in accordance with RWQCB Construction General Permit. These requirements have been included as Mitigation Measures HYD/mm-1.1 and HYD/mm-1.2 to ensure proper timing and that the requirements be included on construction plans. Implementation of a SWPPP with BMPs would address short-term stormwater runoff during construction activities. Following construction activities, the project would increase the amount of impervious surface area onsite. However, the future project design would be required</p>

Master Response #	Master Response
	<p>to be consistent with the Central Coast RWQCB's post-construction stormwater management requirements to address long-term runoff and stormwater flows in the project area. Future proposed stormwater basins would be rough graded to create the basin shape, bottom, and top bench. Relatively flat sloped areas would be created for each use area to direct stormwater runoff to these proposed basins. Consistent with City regulations, each phase of project development would require a comprehensive drainage plan to demonstrate stormwater runoff is conveyed in a non-erosive manner in accordance with the RWQCB stormwater requirements and City Public Improvement Standards. Therefore, stormwater runoff has been adequately addressed in the EIR, and no revisions to the EIR are necessary.</p>
MR-17	<p><b>Land Use Consistency</b></p> <p>Section 4.9, Land Use and Planning, describes existing and proposed land uses within the project site and the site vicinity, their consistency with applicable land use policies, and potential impacts that may result from conflicts with applicable land use policies. Figure 4.9-2 of the EIR identifies the existing City of Santa Maria General Plan designations of the project area, including the preliminary land classifications of land located within the City's SOI. These preliminary land classifications reflect predicted land use designations for areas located within the City's Sphere of Influence if they are annexed into the City in the future. EIR Table 4.9-4 lists applicable plans and policies pertaining specifically to land use and planning that were adopted for the purpose of avoiding or mitigating an environmental effect and a preliminary evaluation of the project's consistency with the guidelines and requirements detailed therein.</p> <p>It should be noted that the conceptual development plan described in Chapter 2, Project Description would not apply to the project site without the project site being annexed into the city of Santa Maria. If the site were to be annexed into the City limits, discretionary permit entitlements (e.g., Planned Development Permits, Tract Maps) would be required. Therefore, the EIR evaluates all potential future development of the project site that would be allowed by the proposed annexation and pre-zoning for consistency with all relevant city plans and policies that would apply to the project site if the annexation were approved. As such, County plans and documents were used for reference only. For example, Section 4.1.2.4 of the EIR describes the current adopted zoning designation of the project site, which is designated by the County of Santa Barbara, Commercial (C-2).</p> <p>Based on the evaluation of the project's potential consistency with relevant plans and policies evaluated in the previous Section 4.9.2.4, the project would not have the potential to result in any inconsistencies with plans and policies. Therefore, land use consistency has been adequately addressed in the EIR, and no revisions to the EIR are necessary.</p>
MR-18	<p><b>Geology</b></p> <p>Specific design plans for the project are currently not known. However, a conceptual plan for future development of the project site has been prepared for the project to evaluate potential environmental impacts of the eventual development of the project site if the proposed annexation and pre-zoning were to be approved. The conceptual plan shows the potential future development that could occur consistent with the project's proposed pre-zone designations.</p> <p>Section 4.6, Geology and Soils, discusses the project's potential impacts relating to geologic hazards and resources. This section of the EIR is based, in part, on the results of the Geotechnical Engineering Report prepared for the project (Earth Systems Pacific 2021; EIR Volume 1, Appendix H). This report describes the geologic conditions of the project site based on a general site reconnaissance, subsurface exploration, laboratory testing of selected samples, and geotechnical analysis of data. This report also includes engineering approaches for site preparation, grading, utility trenches, foundations, retaining walls, slabs-on-grade and exterior flatwork, pavement sections, drainage and maintenance, and construction observation and testing in accordance with the conceptual development plan. As described, the project site is mostly flat with a gentle slope downward from east to west, along with manufactured embankments and fill slopes from adjacent residential development and UVP construction. No natural drainage features are present on the project site. There are several artificially constructed rock drainage ditches leading to culverts under Orcutt Road to manage stormwater from drop inlet storm drains on UVP. As discussed throughout this section of the EIR, mitigation measures have been identified to require implementation of design standards included in the Geotechnical Engineering Report to ensure that the proposed project would be constructed to withstand potential seismic-related and other ground failure events. Upon implementation of the identified mitigation, impacts related to geology and soils would be less than significant.</p> <p>Potential impacts associated with geology and soils have been adequately analyzed in the EIR; no revisions to the EIR are necessary.</p>

*This page intentionally left blank.*



## 1.2 AGENCY COMMENT LETTERS AND RESPONSES

The following agencies have submitted comments on the Draft EIR.

**Table 1.2-1. Agency Comments**

Respondent	Code	Contact Information	Page
<b>California Governor's Office of Planning and Research State Clearinghouse</b> EIR posted: 12/22/2022	SCH	1400 10 <sup>th</sup> Street Sacramento, CA 95814	1.2-3
<b>California Department of Conservation Geologic Energy Management Division</b> Letter dated: 02/01/2023	CalGEM	195 S Broadway, Suite 101 Orcutt, CA 93455 <i>Contact: Miguel Cabrera, Northern District Deputy</i>	1.2-7
<b>California Department of Fish and Wildlife</b> Letter dated: 03/01/2023	CDFW	South Coast Region 3883 Ruffin Road San Diego, CA 92123 <i>Contact: Erinn Wilson-Olgin, Environmental Program Manager I</i>	1.2-11
<b>County of Santa Barbara Public Works Department</b> Letter dated: 01/03/2023	SBPW	123 East Anapamu Santa Barbara, CA 93101 <i>Contact: Marty Wilder, Utilities Manager</i>	1.2-30
<b>Santa Barbara Local Agency Formation Commission</b> Letters dated: 01/13/2023 and 03/06/2023	LAFCO	105 East Anapamu Street Santa Barbara CA 93101 <i>Contact: Mike Prater, LAFCO Executive Officer</i>	1.2-32
<b>Santa Barbara County Air Pollution Control District</b> Letter dated: 02/24/2023	APCD	260 N San Antonio Road, Suite A Santa Barbara, CA 93110 <i>Contact: Emily Waddington, Air Quality Specialist, Planning Division</i>	1.2-47
<b>County of Santa Barbara Planning and Development Department Public Works, Transportation Division Fire Department</b> Letter dated: 03/06/2023	CoSB	105 E Anapamu Street, Room 406 Santa Barbara, CA 93101	1.2-63
	SBPDD		1.2-66
	SBPWT	<i>Contact: Jasmine McGinty, Principal Analyst</i>	1.2-83
	SBCFD		1.2-158

*This page intentionally left blank.*

## 1.2.1 California Governor's Office of Planning and Research State Clearinghouse

### Richards Ranch Annexation (AN2021-0001)

#### Summary

<b>SCH Number</b>	2022020194
<b>Lead Agency</b>	City of Santa Maria
<b>Document Title</b>	Richards Ranch Annexation (AN2021-0001)
<b>Document Type</b>	EIR - Draft EIR
<b>Received</b>	12/22/2022
<b>Present Land Use</b>	The County of Santa Barbara's (County's) Orcutt Community Plan (1997) identifies the project site as "Key Site 26 (Richards)." This key site is designated for residential and commercial development. The project site consists of undeveloped land that is predominantly flat, with some gentle downward sloping from east to west. Vegetation on the site can be characterized as mostly non-native annual grassland habitat, with two patches of disturbed coastal scrub and strands of non-native eucalyptus and ornamental trees. Historically, the project site was developed with a residential structure in the southwest corner of the site; however, the home and all accessory buildings were demolished by 2010.
<b>Document Description</b>	The project includes the Pre-Zoning, General Plan Amendment, and Annexation of four parcels located in the unincorporated Santa Barbara County into the Santa Maria City limits. The project area consists of four parcels located in Santa Barbara County to the northeast and southeast of the intersection of State Route (SR-) 135 and Union Valley Parkway. These parcels, Assessor's Parcel Numbers (APN) 107-250-019, 107-250-020, 107-250-021, and 107-250-022, are within the City of Santa Maria Sphere of Influence (SOI) and adjacent to the southeastern limits of the city of Santa Maria and total approximately 44 acres.

SCH-1

#### Contact Information

<b>Name</b>	Dana Eady
<b>Agency Name</b>	City of Santa Maria
<b>Job Title</b>	Planning Division Manager
<b>Contact Types</b>	Lead/Public Agency
<b>Address</b>	110 S. Pine St. Room 101 Santa Maria, CA 93458
<b>Phone</b>	(805) 925-0951

Email deady@cityofsantamaria.org

## Location

**Coordinates** 34°52'46.4"N 120°26'5.8"W

**Cities** Santa Maria

**Counties** Santa Barbara

**Regions** Citywide

**Cross Streets** southeast of the intersection of State Route (SR-) 135 and Union Valley Parkway.

**Zip** 93455

**Total Acres** 44

**Parcel #** 107-250-019, 107-250-020, 107-250-021, and 107-250-022,

**State Highways** SR- 135, Highway 101

**Railways** Santa Maria Valley Rail Road

**Airports** Santa Maria Public Airport

**Schools** Santa Maria Bonita, Orcutt Union, and Joint Union Districts

**Township** 9 N

**Range** 34W

**Section** 2

**Base** San Bern

## Notice of Completion

**State Review Period Start** 12/22/2022

**State Review Period End** 3/7/2023

**State Reviewing Agencies** California Air Resources Board (ARB), California Department of Fish and Wildlife, South Coast Region 5 (CDFW), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Housing and Community Development (HCD), California Department of Parks and Recreation, California Department of Transportation, District 5 (DOT), California Department of Transportation, Division of Aeronautics (DOT), California Department of Transportation, Division of Transportation Planning (DOT), California Department of Water Resources (DWR), California Highway Patrol (CHP), California Native American Heritage Commission (NAHC), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Central Coast Region 3 (RWQCB), Department of Toxic Substances Control, Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Drinking Water, District 6, California Department of Conservation (DOC)

SCH-1  
(cont'd)

<b>State Reviewing Agency Comments</b>	California Department of Conservation (DOC)
<b>Development Types</b>	Residential (Units 495, Acres 27.4), Commercial (Sq. Ft. 160800, Acres 16.35, Employees 456)
<b>Local Actions</b>	General Plan Amendment, Prezone, Annexation
<b>Project Issues</b>	Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology/Water Quality, Noise, Tribal Cultural Resources, Vegetation
<b>Local Review Period Start</b>	12/22/2022
<b>Local Review Period End</b>	3/7/2023

## Attachments

### Draft Environmental Document [Draft IS, NOI\_NOA\_Public notices, OPR Summary Form, Appx,]

__Memo	PDF	97 K
_City of Santa Maria Memo_1_20_23_SCH Number 2022020194	PDF	123 K
_Revised Notice of Availability_Notice of Intent_1_20_23	PDF	113 K
20210820-Summary_Form_for_Document_Submittal (1)	PDF	616 K
Notice of Availability_Notice of Intent_12-22-21	PDF	113 K
Notice of Availability_Notice of Intent_12-22-21	PDF	113 K
Richards Ranch Annexation Draft EIR_Vol 1_DEIR	PDF	18514 K
Richards Ranch Annexation Draft EIR_Vol 2_DEIR Appendices	PDF	79467 K

### Notice of Completion [NOC] Transmittal form

_Revised Notice of Completion	PDF	356 K
Notice of Completion	PDF	242 K

### State Comment Letters [Comments from state reviewing agencies]

2022020194_DOC comment	PDF	376 K
------------------------	-----	-------

**Disclaimer:** The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at (916) 445-0613. For more information, please visit OPR's [Accessibility Site](#).

SCH-1  
(cont'd)

### **1.2.1.1 Response to Posting from California Governor's Office of Planning and Research State Clearinghouse**

Comment No.	Response
SCH-1	It has been noted that the Draft EIR was received by the California Governor's Office of Planning and Research State Clearinghouse and the public review period began on December 22, 2022, and ended on March 7, 2023. The Draft EIR, Draft EIR Appendices, Notice of Completion, Notice of Availability, and State Clearinghouse Summary Form were made available for public review at <a href="https://ceqanet.opr.ca.gov/Project/2022020194">https://ceqanet.opr.ca.gov/Project/2022020194</a> for the full duration of the 45-day review period.

## 1.2.2 California Department of Conservation Geologic Energy Management Division



California  
Department of Conservation  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director

February 1, 2023

**VIA EMAIL**

Ms. Dana Eady  
Planning Division  
City of Santa Maria  
110 South Pine Street, Room 101  
Santa Maria, CA 93458  
[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

Dear Ms. Eady:

SCH 2022020194 RICHARDS RANCH ANNEXATION PROJECT

The California Geologic Energy Management Division (Division) appreciates the opportunity to submit comments on the project referenced above (Project).

The Division has previously commented on this project. Please see the letter dated March 9, 2022 attached for reference.

Thank you for considering the Division's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at [CalGEMNorthern@conservation.ca.gov](mailto:CalGEMNorthern@conservation.ca.gov)

Sincerely,

*Miguel Cabrera*

Miguel Cabrera  
Northern District Deputy

ZN:jj:ks

cc: Chrono  
CSWR 1012429

CalGEM-1

State of California Natural Resources Agency | Department of Conservation  
Northern District

Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673  
Sacramento Office and Mail: 715 P Street, MS 1803, Sacramento, CA 95814 | T: (916) 322-1110 | F: (916) 445-3319  
Ventura Office: 1000 S. Hill Road, Suite 116, Ventura, CA 93003 | T: (805) 937-7246 | F: (805) 654-4765  
Ventura Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455  
[conservation.ca.gov](http://conservation.ca.gov)



DocuSign Envelope ID: B7698B91-E22E-4528-BEF3-806ECCC99039



California  
Department of Conservation  
Geologic Energy Management Division

Gavin Newsom, Governor  
David Shabazian, Director  
801 K Street, MS 18-05  
Sacramento, CA 95814  
T: (916) 445-9686

03/09/2022

City: Santa Maria - Planning Division  
Dana Eady  
110 S. Pine Street, Room 101, Santa Maria, CA 93458, USA  
deady@cityofsantamaria.org

Construction Site Well Review (CSWR) ID: 1012429

Assessor Parcel Number(s): 107250022, 107250019, 107250020, 107250021

Property Owner(s): Richards Ranch LLC

Project Location Address: 4470 Orcutt Road Santa Maria, California 93455

Project Title: SCH 2022020194 Richards Ranch Annexation Project

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

CalGEM-2

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 2/23/2022. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Santa Barbara County, within the boundaries of the following fields:

CalGEM-3

N/A

The nearest oil well pad is approximately 150 feet to the east of the proposed project boundary. There are three plugged conductors and one Idle well on the pad to the east.

CalGEM-4

DocuSign Envelope ID: B7698B91-E22E-4528-BEF3-806ECCC99039

Our records indicate there are no known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

CalGEM-5

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

CalGEM-6

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Coastal district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Should you have any questions, please contact me at (805) 937-7246 or via email at Miguel.Cabrera@conservation.ca.gov.

Sincerely,



Jon Iverson  
Senior Oil and Gas Engineer

signature on behalf of

Miguel Cabrera  
Northern District Deputy

cc: Dana Eady - Plan Checker

### 1.2.2.1 Response to Letter from California Department of Conservation Geologic Energy Management Division

Comment No.	Response
CalGEM-1	<p>The comment expresses the California Department of Conservation, Geologic Energy Management Division's (CalGEM's) appreciation for the opportunity to comment on the project and references a previously submitted comment letter dated March 9, 2022, which was used during the scoping process for the EIR.</p> <p>This is not specific comment on the analysis contained in the EIR; no response is necessary.</p>
CalGEM-2	<p>The comment introduces a construction site well review evaluating the potential presence of existing or abandoned oil and gas wells on the project site.</p> <p>This is not specific comment on the analysis contained in the EIR; no response is necessary.</p>
CalGEM-3	<p>The comment notes that the project site is located in Santa Barbara County and is not within the boundary of any known oil field.</p> <p>Based on research conducted for the Draft EIR and confirmed in early 2024 (via CalGEM's online well finder database, <a href="https://maps.conservation.ca.gov/doggr/wellfinder/">https://maps.conservation.ca.gov/doggr/wellfinder/</a>), the project site is located within a CalGEM Oil and Gas Field boundary (CalGem 2019). However, there are no wells on the project site.</p>
CalGEM-4	<p>The comment identifies the nearest oil well pad, which lies to the east of the project site.</p> <p>The summary of nearby wells provided by the comment is consistent with the research conducted in support of the EIR. This information does not change the content or conclusions contained in the EIR, Section 4.7, Hazards and Hazardous Materials.</p>
CalGEM-5	<p>The comment indicates that a review of CalGEM's records confirms that there are no know oil or gas wells located within the project site.</p> <p>This assessment is consistent with the information contained in the EIR, Section 4.7, Hazards and Hazardous Materials.</p>
CalGEM-6	<p>The comment discloses CalGEM's authority over any activities related to oil and gas wells. The commenter also emphasizes that the property owner is required to immediately notify CalGEM upon the discovery of any previously unknown wells on the project site.</p> <p>This is not a comment on the analysis contained in the EIR; no response is necessary.</p>

## 1.2.3 California Department of Fish and Wildlife

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



March 14, 2023

Dana Eady  
Planning Manager  
City of Santa Maria  
110 South Pine Street, Room 101  
Santa Maria, CA 93458  
[DEady@cityofsantamaria.org](mailto:DEady@cityofsantamaria.org)

**Subject: Comments on the Draft Environmental Impact Report for the for the Richards Ranch Annexation Project (AN2021-0001) Project #2128, SCH #2022020194, Santa Barbara County**

Dear Dana Eady:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the Richards Ranch Annexation Project (Project). The City of Santa Maria (City) is the lead agency preparing a DEIR pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 15082 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the Project.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

### CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & Game Code, § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & Game Code, § 1900 et

CDFW-1

*Conserving California's Wildlife Since 1870*

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 2 of 15

seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

**Project Description/Objectives:** The Project's purpose is the pre-zoning of four parcels totaling 43.75 acres, located in unincorporated Santa Barbara County by the City of Santa Maria, and annexation of the property into the Santa Maria City limits. The parcels will be pre-zoned and developed with high density residential (27.4 acres) and general commercial uses (16.35 acres). The Project would require approval from the Santa Barbara County Local Agency Formation Commission (SBLAFCO) for the annexation of the parcels. The DEIR prepared for this Project is intended to meet SBLAFCO requirements for annexation.

**Project Location:** The Project site includes four parcels located to the northeast and southeast of the intersection of State Route 135 and Union Valley Parkway in the unincorporated community of Orcutt in Santa Barbara County. The Project site is adjacent to the southeastern limits of the City of Santa Maria and lies within the City's Sphere of Influence. The Project site is approximately 1.5 miles west of U.S. Route 101 and 2.3 miles northeast of State Route 1. The Santa Maria Airport District property is located to the west of State Route 135 and northwest of the Project site, with the terminus of the main runway approximately 0.75 mile to the northwest.

Existing land use to the north and east is open space, and housing is to the south and west.

#### Specific Comments

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

#### COMMENT #1: Overwintering Monarch Butterfly

**Issue:** Monarch butterflies (*Danaus plexippus plexippus*) are federal Endangered Species Act (FESA) candidate species and are considered a special-status species in California. The CEQA document does not adequately analyze Project impacts on monarch butterflies.

**Specific impact:** The Project will result in permanent impacts to monarch butterfly due to the removal of trees utilized for overwintering. The Project area is part of a significant overwintering site, and historical use of this area is documented on the California Natural Diversity Database (CNDDB) Occurrence 354. Monarchs can be found overwintering along the California coast in groves of trees primarily dominated by non-native eucalyptus (*Eucalyptus spp.*), with additional native species including Monterey pine (*Pinus radiata*) and Monterey cypress (*Hesperocyparis macrocarpa*) (Griffiths & Villablanca, 2015; Pelton et al., 2016). Overwintering groves have specific microclimatic conditions that support monarch populations (Fisher et al., 2018).

**Why impacts would occur:** Project-related activities have the potential to impact special-status species and overwintering habitat of the monarch butterfly. The Project proposes to remove 7.63 acres of on-site eucalyptus trees that support an inland overwintering monarch grove. Although CDFW has designated the Project site as an area of high conservation value for monarch butterflies (Area of Conservation Concern HEX ID 50049), the DEIR determined the removal of the trees was not significant. Likewise, the DEIR did not offer any avoidance, minimization, or mitigation measures to reduce impacts to monarch butterfly.

CDFW-1  
(cont'd)

CDFW-2

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 3 of 15

The DEIR cites the decline of numbers of monarch observed at the Project site as justification for not considering the site a significant winter roost. The DEIR states the Project site is not a roost due to 1) one year having no monarch butterflies recorded (2019) during an extended drought, and 2) low numbers of monarchs recorded overwintering in other years (using 6 years of data 2015-2019 and 2021/2022 season counts). The numbers of monarchs observed on the Project site has increased from 0 in 2019 to 34 during the 2021/22 survey count, consistent with lower numbers of monarchs range wide. The Pismo Preserve (San Luis Obispo County) cited by the DEIR as supporting over 22,000 monarchs only had 36 overwintering monarchs counted at the 2020/21 New Year Survey (Xerces, 2022). The majority of roosts supporting overwintering monarchs in Santa Barbara County from 2016 to 2022, tracked by CDFW and the Xerces Society, contain an average of 451 individuals. Of these Santa Barbara County data, many sites had a low population count of zero for many years, and the highest population was recorded at 34,000 individuals at The Nature Conservancy preserve in 2022.

Inland winter roosts in the Santa Maria area contain lower numbers of monarch butterflies than coastal roosts but are still biologically significant resources for this species. The largest aggregation of monarchs historically observed in the Santa Maria Area was 1100 individuals (1998) in a grove on the south side of Pioneer Park, which was subsequently cut down between 2009-2012 for road/trail construction (CNDDDB Occurrence 352). The value of inland Santa Maria overwintering sites in the DEIR should not be established by comparing these roosts to the larger Pismo Preserve coastal overwintering site. The inland Santa Maria overwintering sites have always been aggregations of smaller numbers of individuals but provide a valuable ecological niche to the species. Removal of smaller overwintering roosts forces the congregation of monarchs into larger colonies where stochastic events (disease, fire, grove removal, climate change) could cause loss of the entire species. Multiple overwintering sites that are widely distributed buffers the species against catastrophic loss and extinction. Based on the biological value of these smaller roosts in the inland Santa Maria area, CDFW considers the loss of this roost significant without the incorporation of mitigation to replace the overwintering habitat of this roost.

The CNDDDB has records of several projects in the general vicinity of this Project (e.g., road construction grove removal at pioneer park, trail maintenance, food bank solar project) that have removed known monarch roosts. Based on the cumulative loss of monarch overwintering groves in the Santa Maria area documented in the CNDDDB, CDFW considers the loss of this roost significant without the incorporation of mitigation to replace the overwintering value available to monarchs.

**Evidence impact is potentially significant:** During the last three decades, the western migratory monarch population that overwinters along the California coast has declined by more than 99% (Marcum & Darst, 2021). Habitat loss and fragmentation, including grove senescence, are among the primary threats to the population (Thogmartin et al., 2017). Monarch overwintering sites have specific microclimate conditions that are influenced by the configuration of trees and other foliage near the site (Griffiths & Villablanca, 2015). Alteration of the site and surrounding areas could impact microclimate conditions, thereby reducing the suitability of the site for monarchs (Weiss et al., 1991). Project activities have the potential to significantly impact the species by reducing possible overwintering habitat or altering habitat climatic conditions.

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR. Potential significant impacts associated with cumulative removal of eucalyptus trees and known overwintering groves in the Santa Maria area were not evaluated in the DEIR.

CDFW-2  
(cont'd)

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 4 of 15

CDFW considers impacts to rare species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. Project(s) activities have the potential to significantly impact the species by reducing possible roosting habitat.

**Recommended Potentially Feasible Mitigation Measures:**

To evaluate potential impacts of the Project to monarch butterflies, CDFW recommends the following mitigation measures as conditions of approval in the Project's CEQA document.

**Mitigation Measure #1: Avoidance**

CDFW recommends redesigning the proposed development to avoid removal of the eucalyptus trees that support monarch overwintering habitat.

Monarch overwintering habitat should be avoided by delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted to determine how to implement ground and tree-disturbing activities and avoid take.

**Mitigation Measure #2: Monarch Butterfly Habitat Assessment**

CDFW recommends consulting with a qualified biologist knowledgeable of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants should be marked and avoided during project activities. The Project proponent should avoid the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.

**Mitigation Measure #3: Monarch Habitat Avoidance**

Management activities in groves should be conducted between March 16 and September 14, in coordination with a qualified biologist (Marcum & Darst, 2021). A qualified biologist should be retained to conduct a habitat assessment, well in advance of Project implementation. The qualified biologist should assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.

**Recommendation #1: Cumulative Impact CEQA Impact Analysis**

The CEQA document should address and fully analyze the cumulative impacts, and specifically against the loss of smaller inland roosts that serve a separate biological function to the larger coastal roosts.

**Recommendation #2: Biological Significance CEQA Impact Analysis**

The CEQA document should evaluate how the proposed development would impact the known overwintering monarch habitat on site as well as how this would affect both the local and regional overwintering populations. Mitigation measures to mitigate for the loss of an

↑ CDFW-2  
(cont'd)

CDFW-3

CDFW-4

CDFW-5  
↓

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 5 of 15

overwintering inland roost should be included to ensure no net loss of overwintering roost habitat.

▲ CDFW-5  
└ (cont'd)

#### COMMENT #2: Monarch Butterfly – Pesticides

**Issue:** Use of pesticides during all phases of the Project have the potential to impact monarch butterflies, a special-status species, and their overwintering habitat. The use of pesticides has been linked to direct and indirect effects on the monarch population (The Center for Biological Diversity et al., 2014).

**Specific Impact:** Potential significant impacts associated with the Project's use of pesticides include poisoning of adult and larval monarchs, reduced vigor or reproductive success, mortality of adult and larval monarchs, and loss of essential habitat.

**Why impact would occur:** Pesticide use on the Project site has the potential to impact monarchs in two ways. First, if the overwintering grove is avoided and left on site, monarch using the site would be exposed to pesticides used around nectar plants on the Project site as well as direct spray exposure. Second, if the on-site grove is removed, the monarchs in the general vicinity that use landscape plants on the Project site would be exposed to pesticides either by direct spray exposure or residually in pollen/nectar.

The widespread use of pesticides is a major threat to monarch butterfly populations. Broadcast spraying of herbicides like glyphosate have led to a decline in abundance of milkweed, which directly impacts monarchs' ability to reproduce (Pleasants & Oberhauser, 2013; Thogmartin et al., 2017). Insecticides like neonicotinoids show up in the tissues and nectar of milkweed and other flowering plants, reducing survival of larval and adult monarchs (Halsch et al., 2020; Krischik et al., 2015).

CDFW-6

**Evidence impact is potentially significant:** Monarch butterflies are ESA candidate species and are considered a special-status species in California. CDFW considers impacts to rare species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

Project(s) activities have the potential to significantly impact the species by reducing possible foraging habitat and exposing all stages of the monarch lifecycle to detrimental substances such as pesticides.

#### Recommended Potentially Feasible Mitigation Measures:

##### Mitigation Measure #1: Pesticide Avoidance

The CEQA document should include measures that minimize/prohibit the use of synthetic pesticides and herbicides on the Project site. Use of neonicotinoids, which may include nursery plants or seeds that have been treated with neonicotinoids, should be avoided. Spraying pesticides within a mile of an overwintering site from mid-September to mid-March should be prohibited (Marcum & Darst, 2021).



DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 6 of 15

**Mitigation Measure #2: Pesticide Use**

If pesticide use cannot be precluded from the Project, a qualified biologist should survey the Project area for suitable monarch breeding or foraging habitat and the presence of monarchs in various life stages. If monarchs are found to be present on the site, only targeted pesticide application techniques should be used within a mile of the Project area. If monarchs are not present at the site and the Project intends to broadcast spray pesticides, CDFW recommends that all manufacturer recommended application techniques and precautions be followed, including those for storage and disposal. The CEQA document should require the use of pesticides and techniques recommended for use near pollinators by the United States Environmental Protection Agency (USEPA) and California Department of Pesticide Regulation (DRP). Guidance can be found at the USEPA website and the DPR website. Pesticide application should minimize drift of pesticides outside of the target area by maintaining a spatial buffer of at least 40 feet from suitable monarch habitat (Marcum & Darst, 2021; Pelton et al., 2018). All pesticide application must be conducted by a Licensed and Certified Pesticide Applicator.

CDFW-6  
(cont'd)

**Recommendation #1: Impact Analysis**

The CEQA document should disclose the use of pesticides and discuss its associated impacts, including the risk of secondary poisoning to non-target species.

**COMMENT #3: California Tiger Salamander**

**Issue:** The Project is within the range that supports California tiger salamander (*Ambystoma californiense*) upland dispersal habitat adjacent to a breeding pond. The Project site contains an emergent wetland that could support water for extended periods during wet years.

**Specific Impact:** The Project site is on the border of mapped California tiger salamander range, with a small portion of the Project falling inside mapped suitable California tiger salamander habitat. The Project site contains suitable upland habitat and potentially suitable aquatic habitat for California tiger salamander. The Project site is immediately adjacent to the line drawn on CNDDB as the species range. Surveys were not completed to determine presence or absence of California tiger salamander on the Project.

**Why impact would occur:** CDFW is concerned with the potential for Project related impacts to California tiger salamander aquatic and upland habitat on the Project site and is concerned with the potential for take of California tiger salamander. CDFW and the United States Fish and Wildlife Service have developed survey protocol (Guidelines) to be used to detect California tiger salamander in aquatic and upland habitat with the potential to support California tiger salamander (Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander, <http://www.dfg.ca.gov/wildlife/nongame/docs/CTSFinalGuide10-03.pdf>). Examples of take include killing of California tiger salamander by heavy equipment during grading activities or during wetland removal. Without completing surveys following CDFW and United States Fish and Wildlife Service Guidelines, the Project may result in undisclosed and unmitigated take of California tiger salamander.

CDFW-7

**Evidence impact is potentially significant:** Under the California Endangered Species Act (CESA), take of any endangered, threatened, candidate species, or state-listed rare plant

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 7 of 15

species that results a project is prohibited, except as authorized by State law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, any activity during the life of a project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)).

Revisions to the Fish and Game Code, effective January 1998, require CDFW to issue a separate CEQA document for the issuance of a CESA permit, unless the project CEQA document addresses all project impacts to the listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. It is imperative with these potential permitting obligations that the CEQA documents include a thorough and robust analysis of the potentially significant impacts to California tiger salamander and their habitat which may occur as a result of the proposed Project. For any such potentially significant impacts, the City should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to include this analysis in the CEQA documents could preclude CDFW from relying on the city's analysis to issue an ITP without CDFW first conducting its own, separate lead agency subsequent or supplemental analysis for the project (See, e.g., Cal. Code Regs., tit. 14, § 15096(f); Pub. Resources Code, § 21166).

**Recommended Potentially Feasible Mitigation Measure(s):**

**Mitigation Measure #1: Surveys**

Protocol surveys following the Guidelines should be conducted on site to determine presence or absence of California tiger salamander. If California tiger salamander are present, the City should consult with CDFW under CESA for potential take coverage resulting from this Project.

**Comment #4: Lake and Streambed Alteration Agreement (LSAA)**

**Issue:** CDFW has determined that features subject to Fish and Game Code, section 1600 et seq. may be impacted by the proposed Project.

**Specific Impact:** The DEIR states the Project could result in impacts to features CDFW regulates under section 1600 et seq. The Project proposes to remove riparian vegetation, fill a freshwater emergent wetland/seep, and alter surface drainage patterns.

**Why impact would occur:** The Project may divert surface drainage or otherwise alter the existing drainage pattern of the Project site. Runoff with high total suspended solids and total dissolved solids has been shown to be high in nutrients as well as other contaminants.

The Project may substantially adversely affect the existing drainage patterns of the Project site through the alteration or diversion of water, which absent specific mitigation, could result in substantial erosion or siltation on-site or off-site of the Project.

CDFW-7  
(cont'd)

CDFW-8

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 8 of 15

**Evidence impact would be significant:** The Project may impact streams and associated riparian habitats. CDFW exercises its regulatory authority (Fish and Game Code, section 1600 *et seq.*) to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code, section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration Agreement (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources. For reasons discussed above, the Project continues to have a substantial adverse effect on streams and associated riparian habitat through direct removal, filling, hydrological interruption, or other means.

#### **Mitigation Measure #1: Notification**

CDFW has concluded that the Project may result in the alteration of features regulated by CDFW. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 *et seq.* Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program webpage to for information about LSAA notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2023).

CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA.

Any LSAA issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSAA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to aquatic resources, additional mitigation conditioned in any LSAA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

#### **Additional Recommendations**

**Weed Management Plan.** A weed management plan should be developed for the Project area and implemented both during and for at least three years post-Project. Soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established both during and after construction, to control the local spread of invasive plants. The Project area should be monitored via mapping

CDFW-8  
(cont'd)

CDFW-9

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 9 of 15

for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.

**Project Landscaping.** CDFW encourages landscaping using native trees and shrubs to benefit native wildlife such as insect pollinators. Insect pollinators such as the monarch butterfly and native bees have declined drastically relative to 1980s levels and have had an especially drastic decline since 2018 (Goulson et al., 2015; Marcum & Darst, 2021). Habitat loss may be a primary driver of monarch decline in the west (Crone et al., 2019). CDFW recommends planting native flowering species over non-native ornamental species where possible. Tropical milkweed (*Asclepias currasavica*) should never be included in landscaping. In addition, the planting of native milkweed species can help to provide breeding habitat for monarch butterfly (not recommended within five miles of the coast north of Santa Barbara County and within one mile of the coast south of Santa Barbara County (Marcum & Darst, 2021)).

#### Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife resources, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (California Code of Regulations, tit. 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089).

#### CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Kelly Schmoker, Senior Environmental Scientist, at (626) 848-8382 or by email at [Kelly.Schmoker@wildlife.ca.gov](mailto:Kelly.Schmoker@wildlife.ca.gov).

Sincerely,

DocuSigned by:



Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

ec: CDFW  
Steve Gibson, Seal Beach – [Steve.Gibson@wildlife.ca.gov](mailto:Steve.Gibson@wildlife.ca.gov)  
Hillary Sardinias, Sacramento – [Hillary.Sardinias@wildlife.ca.gov](mailto:Hillary.Sardinias@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)

OPR  
State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

USFWS  
Christopher Diel – [Christopher\\_Diel@fws.gov](mailto:Christopher_Diel@fws.gov)

↑ CDFW-9  
(cont'd)

CDFW-10

CDFW-11

CDFW-12

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 10 of 15

## References

- [CDFW] California Department of Fish and Wildlife. 2023. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>
- Crone, E. E., Pelton, E. M., Brown, L. M., Thomas, C. C., & Schultz, C. B. 2019. Why are monarch butterflies declining in the West? Understanding the importance of multiple correlated drivers. *Ecological Applications*, 29(7), 1–13. <https://doi.org/10.1002/eap.1975>
- Fallon, C., Borders, B., Lee-Mäder, E., & Black, S. H. 2015. Milkweeds and Monarchs in the Western US.
- Fisher, A., Saniee, K., van der Heide, C., Griffiths, J., Meade, D., & Villablanca, F. 2018. Climatic niche model for overwintering monarch butterflies in a topographically complex region of California. *Insects*, 9(4). <https://doi.org/10.3390/insects9040167>
- [FHVG] Fisheries Hydroacoustic Working Group. 2008. Interim Criteria for Injury of Fish Exposed to Pile Driving Operations: Memorandum. Washington: Federal Highway Administration. Available from: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/ser/bio-fhwg-criteria-agree-a11y.pdf>.
- Flockhart, D. T. T., Pichancourt, J. B., Norris, D. R., & Martin, T. G. 2015. Unravelling the annual cycle in a migratory animal: Breeding-season habitat loss drives population declines of monarch butterflies. *Journal of Animal Ecology*, 84(1), 155–165. <https://doi.org/10.1111/1365-2656.12253>
- Goulson, D., Nicholls, E., Botías, C., & Rotheray, E. L. 2015. Bee declines driven by combined stress from parasites, pesticides, and lack of flowers. *Science*, 347(6229). <https://doi.org/10.1126/science.1255957>
- Griffiths, J., & Villablanca, F. 2015. Managing monarch butterfly overwintering groves: Making room among the eucalyptus. *California Fish and Game*, 101(1), 40–50.
- Halsch, C. A., Code, A., Hoyle, S. M., Fordyce, J. A., Baert, N., & Forister, M. L. 2020. Pesticide Contamination of Milkweeds Across the Agricultural, Urban, and Open Spaces of Low-Elevation Northern California. *Frontiers in Ecology and Evolution*, 8(June), 1–11. <https://doi.org/10.3389/fevo.2020.00162>
- Krischik, V., Rogers, M., Gupta, G., & Varshney, A. 2015. Soil-applied imidacloprid translocates to ornamental flowers and reduces survival of adult *coleomegilla maculata*, *harmonia axyridis*, and *hippodamia convergens* lady beetles, and larval *danaus plexippus* and *vanessa cardui* butterflies. *PLoS ONE*, 10(3), 1–22. <https://doi.org/10.1371/journal.pone.0119133>
- Marcum, S., & Darst, C. 2021. Western Monarch Butterfly Conservation Recommendations.
- [NMFS] National Marine Fisheries Service. 2014. California Eelgrass Mitigation Policy and Implementing Guidelines. NOAA Fisheries West Coast Region (October 2014). Available from: [https://media.fisheries.noaa.gov/dam-migration/cemp\\_oct\\_2014\\_final.pdf](https://media.fisheries.noaa.gov/dam-migration/cemp_oct_2014_final.pdf)

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091

Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 11 of 15

- [NMFS] National Marine Fisheries Service. 2014. California Eelgrass Mitigation Policy and Implementing Guidelines. NOAA Fisheries West Coast Region (October 2014). Available from: [https://media.fisheries.noaa.gov/dam-migration/cemp\\_oct\\_2014\\_final.pdf](https://media.fisheries.noaa.gov/dam-migration/cemp_oct_2014_final.pdf).
- Pelton, E., Jepsen, S., Schultz, C., Fallon, C., & Black, S. H. 2016. State of the monarch butterfly overwintering sites in California. In The Xerces Society for Invertebrate Conservation. <http://www.xerces.org/state-of-the-monarch-butterfly-overwintering-sites-in-california/>
- Pelton, E., McKnight, S., Fallon, C., Code, A., Hopwood, J., Hoyle, S. M., Jepsen, S., & Black, S. H. 2018. Managing for Monarchs in the West: Best Management Practices for Conserving the Monarch Butterfly and its Habitat.
- Pleasants, J. M., & Oberhauser, K. S. 2013. Milkweed loss in agricultural fields because of herbicide use: Effect on the monarch butterfly population. Insect Conservation and Diversity, 6(2), 135–144. <https://doi.org/10.1111/j.1752-4598.2012.00196.x>
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2022. A manual of California Vegetation online version, accessed at <https://vegetation.cnps.org/>.
- The Center for Biological Diversity, The Center for Food Safety, The Xerces Society, & Brower, L. (2014). PETITION TO PROTECT THE MONARCH BUTTERFLY ( DANAUS PLEXIPPUS PLEXIPPUS ) Notice of Petition. 1–159.
- The Xerces Society. 2017. Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat.
- Thogmartin, W. E., Wiederholt, R., Oberhauser, K., Drum, R. G., Diffendorfer, J. E., Altizer, S., Taylor, O. R., Pleasants, J., Semmens, D., Semmens, B., Erickson, R., Libby, K., & Lopez-Hoffman, L. 2017. Monarch butterfly population decline in north america: Identifying the threatening processes. Royal Society Open Science, 4(9). <https://doi.org/10.1098/rsos.170760>
- Weiss, S. B., RICH, P. M., MURPHY, D. D., CALVERT, W. H., & EHRLICH, P. R. 1991. Forest Canopy Structure at Overwintering Monarch Butterfly Sites: Measurements with Hemispherical Photography. Conservation Biology, 5(2), 165–175. <https://doi.org/10.1111/j.1523-1739.1991.tb00121.x>
- Xerces Society Western Monarch Count. 2022. Western Monarch Thanksgiving Count and New Year's Count Data, 1997-2021. Available at [www.westernmonarchcount.org](http://www.westernmonarchcount.org).

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091  
State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)



GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director

#### Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			Timing	Responsible Party
	Mitigation Measure (MM) or Recommendation (REC)			
<b>MM-BIO-1-</b> Monarch Butterfly-Avoidance, Project Development Redesign	CDFW recommends redesigning the proposed development to avoid removal of the eucalyptus trees that support monarch overwintering habitat.  Monarch overwintering habitat shall be avoided by delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted to determine how to implement ground and tree-disturbing activities and avoid take.		Prior to Project construction and activities	City of Santa Maria/Applicant
<b>MM-BIO-2-</b> Monarch Butterfly-Habitat Assessment	CDFW recommends consulting with a qualified biologist knowledgeable of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants should be marked and avoided during project activities. The Project proponent should avoid the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.		Prior to Project construction and activities	City of Santa Maria/Applicant
<b>MM-BIO-3-</b> Monarch Butterfly-Habitat Avoidance	Management activities in groves should be conducted between March 16 and September 14, in coordination with a qualified biologist (Marcum & Darst, 2021). A qualified biologist shall be retained to conduct a habitat assessment, well in advance of Project implementation. The qualified biologist shall assess habitat		Prior to Project construction	City of Santa Maria/Applicant

*Conserving California's Wildlife Since 1870*

CDFW-13

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091  
Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 13 of 15

	following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.	and activities	
<b>MM-BIO-4-</b> Monarch Butterfly- Pesticide Avoidance	The CEQA document shall include measures that minimize/prohibit the use of synthetic pesticides and herbicides on the Project site. Use of neonicotinoids, which may include nursery plants or seeds that have been treated with neonicotinoids shall be avoided. Spraying pesticides within a mile of an overwintering site from mid-September to mid-March should be prohibited (Marcum & Darst, 2021).	Prior to/ During/ After Project construction and activities	City of Santa Maria/ Applicant
<b>MM-BIO-5-</b> Monarch Butterfly- Pesticide Use	If pesticide use cannot be precluded from the Project, a qualified biologist should survey the Project area for suitable monarch breeding or foraging habitat and the presence of monarchs in various life stages. If monarchs are found to be present on the site, only targeted pesticide application techniques should be used within a mile of the Project area. If monarchs are not present at the site and the Project intends to broadcast spray pesticides, CDFW recommends that all manufacturer recommended application techniques and precautions be followed, including those for storage and disposal. The CEQA document should require the use of pesticides and techniques recommended for use near pollinators by the United States Environmental Protection Agency (USEPA) and California Department of Pesticide Regulation (DRP). Guidance can be found at the USEPA website and the DPR website. Pesticide application should minimize drift of pesticides outside of the target area by maintaining a spatial buffer of at least 40 feet from suitable monarch habitat (Marcum & Darst, 2021; Pelton et al., 2018). All pesticide application must be conducted by a Licensed and Certified Pesticide Applicator.	Prior to/ During/ After Project construction and activities	City of Santa Maria/ Applicant
<b>MM-BIO-6-</b> California Tiger Salamander- Presence/Absence Surveys	Protocol surveys following the Guidelines should be conducted on -site to determine presence or absence of California tiger salamander. If California tiger salamander are present, the City should consult with CDFW under CESA for potential take coverage resulting from this Project	Prior to Project construction and activities	City of Santa Maria/ Applicant
<b>MM-BIO-7- LSAA-</b> Notification	CDFW has concluded that the Project may result in the alteration of features regulated by CDFW. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines	Prior to Project construction	City of Santa Maria/ Applicant

CDFW-13  
(cont'd)



DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091  
Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 14 of 15

	whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program webpage for information about LSAA notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2023).  CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.  Any LSAA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSAA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to aquatic resources, additional mitigation conditioned in any LSAA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.	and activities	
<b>REC-BIO-1-</b> Analysis of Cumulative impacts to Monarch Butterfly	The CEQA document should address and fully analyze the cumulative impacts, and specifically, against the loss of smaller inland roosts that serve a separate biological function to the larger coastal roosts. Absent of this analysis the Project may still result in significant impacts.	Prior to Project construction and activities	City of Santa Maria/ Applicant
<b>REC-BIO-2-</b> Analysis of Overwintering Habitat for Monarch Butterfly	The CEQA document should evaluate how the proposed development would impact the known overwintering monarch habitat on site as well as how this would affect both the local and regional overwintering populations. Mitigation measures to mitigate for the loss of an overwintering inland roost should be included to ensure no net loss of overwintering roost habitat.	Prior to Project construction and activities	City of Santa Maria/ Applicant

CDFW-13  
(cont'd)

DocuSign Envelope ID: EDD80C9F-7C9C-42D3-89ED-0440F4153091  
Dana Eady  
Planning Manager, City of Santa Maria  
March 14, 2023  
Page 15 of 15

<b>REC-BIO-3-</b> Analysis of Pesticide Use	The CEQA document should disclose the use of pesticides and discuss its associated impacts, including the risk of secondary poisoning to non-target species.	Prior to Project construction and activities	City of Santa Maria/ Applicant
<b>Rec-BIO-4- Weed Management Plans</b>	A weed management plan shall be developed for the Project area and implemented both during and for at least 3 years post-Project. Soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established both during and after construction, to control the local spread of invasive plants. The Project area should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.	Prior to Project construction and activities	City of Santa Maria/ Applicant
<b>REC-BIO-5-</b> Landscaping	The Project shall use native trees and shrubs to benefit native wildlife such as insect pollinators. Insect pollinators such as the monarch butterfly and native bees have declined drastically relative to 1980s levels and have had an especially drastic decline since 2018 (Goulson et al., 2015; Marcum & Darst, 2021). Habitat loss may be a primary driver of monarch decline in the west (Crone et al., 2019). CDFW recommends planting native flowering species over non-native ornamental species where possible. Tropical milkweed ( <i>Asclepias currasavica</i> ) should never be included in landscaping. In addition, the planting of native milkweed species can help to provide breeding habitat for monarch butterfly (not recommended within five miles of the coast north of Santa Barbara County and within one mile of the coast south of Santa Barbara County (Marcum & Darst, 2021)).	Prior to Project construction and activities	City of Santa Maria/ Applicant

CDFW-13  
(cont'd)

### 1.2.3.1 Response to Letter from California Department of Fish and Wildlife

Comment No.	Response
CDFW-1	<p>The comment introduces the California Department of Fish and Wildlife (CDFW), notes that the agency has reviewed the Draft EIR and describes CDFW's role as a Trustee and Responsible Agency. This comment also provides an overview of the project description and location.</p> <p>This comment does not provide a specific comment on the analysis contained in the EIR; no response is necessary.</p>
CDFW-2	<p>The comment describes CDFW's concern over the issue of monarch butterflies and indicates that CDFW feels the project would have permanent impacts to monarch butterfly due to the proposed removal of trees used by the monarch butterflies for overwintering. The CDFW further describes that the project area is part of a significant overwintering site, and historical use of this area is documented in the California Natural Diversity Database (CNDDDB) as Occurrence 354. The CDFW describes, at length, why the CDFW holds the position that impacts would occur. Specifically, the Xerces Society and CDFW have identified the stand of eucalyptus trees along the southern side of Union Valley Parkway as a Western Monarch Overwintering Site (mapped as #2688, 7.63 acres). Further, the CDFW has indicated that this eucalyptus grove is an important inland overwintering grove of the monarch butterfly and that it has high conservation value (CDFW 2023).</p> <p>Section 4.3, Biological Resources, provides the evaluation of the project's potential impacts to biological resources. Following receipt of the March 14, 2023, comment letter from the CDFW, the City revised its findings regarding the existing 7.63-acre overwintering site that is within the project site boundaries. Because of the new information provided, revisions to the recommended mitigation measures for the monarch butterfly were warranted. Additionally, the conclusion regarding the impacts following implementation of the mitigation measures required revision. As presented in Section 4.3, Biological Resources, of the PRDEIR, which was published in January 2024, removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The information contained in the PRDEIR and this Final EIR is consistent with the information contained in this comment.</p> <p>The City determined that feasible mitigation measures are not available to reduce impacts to a less-than-significant level. Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with development of the proposed project or any project on the project site similar in density to the proposed project.</p> <p>Because the proposed project would result in the removal of the 7.63-acre grove that provides overwintering habitat for the monarch butterfly, and the CDFW has indicated that this eucalyptus grove is an important inland overwintering grove of the monarch butterfly and has high conservation value (CDFW 2023), development of the project could directly impact monarch butterflies. The EIR identifies Mitigation Measure BIO/mm-2.1, which provides several feasible measures aimed at reducing and partially compensating for the significant impacts that would occur to the monarch butterfly and its habitat. The complete mitigation measure is provided in Section 4.3 of the EIR; the specific elements of Mitigation Measure BIO/mm-2.1 include:</p> <ol style="list-style-type: none"> <li>If possible, site disturbance and construction activity that would impact eucalyptus trees onsite shall not occur during the monarch butterflies' fall and winter migration period (October 15 through February 29).</li> <li>If tree or vegetation removal or site disturbance is required during the monarch butterflies' fall and winter migration period (October 15 through February 29), a City-approved biologist familiar with monarchs and monarch overwintering habitat shall conduct focused surveys for monarch colonies within the identified overwintering site and will identify any colonies found within 7 days of proposed vegetation removal or site disturbance or when known monarch overwintering is occurring at other locations within the region. If monarch butterflies are detected, development shall be postponed until after the overwintering period or until the City-approved biologist determines monarch butterflies are no longer using the trees for overwintering.</li> <li>To provide further protection to non-overwintering populations and/or adjacent over-wintering populations, no <i>Asclepias curassavica</i> (tropical milkweed) will be allowed in any planting palettes for the project. Native milkweed species, such as <i>Asclepias fascicularis</i> (narrowleaf milkweed) are also not recommended by the USFWS to be planted adjacent to existing overwintering sites as this may interfere with normal migrating behavior (USFWS 2023b). To contribute to local monarch butterfly conservation efforts, native nectar-providing plant species will be incorporated into landscaping following construction activities, such as those recommended in the Monarch Butterfly Nectar Plant List for Conservation Plantings, to enhance local nectar sources (Xerces Society 2018).</li> </ol> <p>In addition, as a condition of approval for the Planned Development permit(s), the use of neonicotinoids and synthetic pesticides shall be prohibited in the initial project plantings and throughout the life of the project in open space, pocket parks, and other common landscaped</p>

Comment No.	Response
	<p>areas. This condition shall apply to the common open spaces for the life of the project and shall be included in the CC&amp;Rs which will be recorded against the property prior to the issuance of a first certificate of occupancy. In addition, Future residents and occupants shall be encouraged to not use neonicotinoids, synthetic pesticides, and/or plants treated with these materials; residents and occupants will be provided educational materials describing 1) viable alternatives to these products, and 2) the detrimental effects of these products on butterflies and other pollinators.</p> <p>d. Prior to the approval of a Planned Development permit and prior to the removal of any trees within the overwintering site, the developer shall hire a City-approved biologist familiar with monarchs and monarch overwintering habitat to prepare and implement a monarch butterfly habitat enhancement plan. At a minimum, the plan shall identify area(s) on the property appropriate for onsite habitat enhancement to partially address the direct impacts of tree removal. The recommendations in this plan shall be included within the project's future project's landscaping plans for review and approval by the City prior to implementation.</p> <p>e. Prior to the approval of the first building permit for the project, the developer, in consultation with the City of Santa Maria Community Development Department, shall identify and provide a donation to a Qualified and Suitable Conservation Entity for monarch habitat conservation that can receive financial support to further enhance and/or promote conservation efforts in the region. A Qualified and Suitable Conservation Entity is defined as a conservation or government organization that:</p> <ul style="list-style-type: none"> <li>i. Has an established preserve in Santa Barbara or San Luis Obispo Counties within the ecological range of overwintering monarch butterfly that is dedicated to conservation purposes and is actively managing lands or resources for conservation in Santa Barbara or San Luis Obispo County;</li> <li>ii. Has specific experience and/or land holdings with monarch butterfly and their habitats; and</li> <li>iii. Can specifically identify at least 7.6 acres of habitats within their preserve(s) to be managed or enhanced as regionally significant monarch overwintering habitat within the Santa Barbara or San Luis Obispo County area.</li> </ul> <p>The developer shall provide a donation in an amount required by the Suitable Conservation Entity to fund 5 years of conservation research, restoration, site protection, and/or maintenance and management activities to the benefit of overwintering monarch butterfly habitat. Examples of funding opportunities would be for use in maintenance of existing grove trees, exotic species control, native grove tree planting and/or replacement of eucalyptus trees with native tree species, planting of understories with native plant communities, general grove habitat maintenance, and/or qualitative and quantitative monitoring efforts over a 5-year period. These efforts may also contribute to improving scientific studies on monarch butterflies and their conservation in the city and/or Santa Barbara or San Luis Obispo County.</p> <p>A copy of the final executed agreement between the developer and the Qualified and Suitable Conservation Entity shall be submitted to the City prior to the City's issuance of the first building permit for the Richards Ranch project.</p> <p>Development of the project site under the conceptual development plan or any project of a similar density would necessitate the removal of the 7.63-acre monarch overwintering site (mapped as #2688) that exists on the project site. Removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The CDFW is concerned that the loss of trees used by monarch butterflies for overwintering could contribute to extirpation of western monarch populations and has indicated that off-site mitigation is not feasible for the loss of overwintering habitat at the project site. I</p> <p>Impacts cannot not be fully mitigated because there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while potential created or restored overwintering habitat matures. For these reasons, while mitigation is available through supporting existing conservation efforts of established habitats that are actively managed by qualified conservation entities, the City determines that feasible mitigation measures are not available to fully reduce potentially significant impacts to the monarch butterfly from loss of habitat to a less-than-significant level.</p> <p>Thus, residual impacts to monarch butterflies would continue to be significant and unavoidable with the buildout of the conceptual development plan or of a project on the project site that is similar in density.</p>
CDFW-3	<p>The comment describes what CDFW believes are potentially feasible mitigation measures, including avoidance and a habitat assessment.</p> <p>After receiving this comment letter, the City fully considered options for mitigation and protection of the grove, including whether feasible measures were present to provide for the development of the project site consistent with private ownership of the project site and current regulatory context. Additionally, a full tree evaluation was conducted by Pleinaire Design Group (2023) to determine the health of the trees. Pleinaire Design Group visited the project site multiple times, most recently on July 13, 2023, when an evaluation of</p>

Comment No.	Response
	<p>the condition of the trees occurred; the evaluation was conducted by Kevin J. Small (CA Registered Landscape Architect 2929 and ISA Certified Arborist WE-7333A).</p> <p>The analysis includes a detailed description of each tree, noting health, conditions, hazard comments, or other conditions, such as fire damage. The arborist assessment indicates that the eucalyptus grove that provides the overwintering habitat is an old windrow of trees that has been cut down at some point and allowed to regrow out of the remaining stumps. There are many trees that were identified as volunteers from seed. The trees are growing very close together and, in most cases, there is a tangle of branches and litter between them. When eucalyptus grows in very close, similar to the trees at the project site, the roots fuse between trees, making them one biological entity. It is not possible to remove individual trees selectively. If single trees were to be removed, the sandy soil conditions would increase the possibility of the remaining trees falling over. The trees are essentially supporting each other (Pleinaire Design Group 2023).</p> <p>There has been no regular maintenance of the trees on the project site; however, the ground has been mowed for weed abatement as evidenced by the tire tracks and no high grasses. There are downed trunks and branches, deep litter of leaves and shedding bark, and stumps scattered throughout the area. Due to the health of the trees, the arborist report recommends against protection for any of the trees. They are hazardous, have weak attachment, and could easily fail. There are also many over-extended branches, dead crowns, and unbalanced structures (Pleinaire Design Group 2023). The current eucalyptus groves are not maintained and are not expected to have long-term viability. They are not planned to be maintained in the future. For these reasons, the existing grove at the Richards Ranch site that provides monarch butterfly overwintering habitat is not sustainable and will likely, ultimately, be lost.</p> <p>Full avoidance of the 7.63-acre monarch overwintering site is not a feasible mitigation measure due to the size of the grove and in consideration of the basic purpose of the project to provide a mixed-use development on the 43.75-acre site. Due to the central location of the eucalyptus grove, protection of this resource, and creation of an adequate buffer zone between the project development and the grove for resource protection and hazard abatement, many more acres of the project site would need to remain in open space than the 7.63-acre area that delineates the grove. This type of buffer zone and protection of the grove would render a project like Richards Ranch (of a similar size and density) as infeasible to develop.</p> <p>The CDFW notes, within this comment, that a no-disturbance buffer of 0.5 mile is indicated as an appropriate buffer. This large of a buffer would result in the project site not being able to be developed with any urban land use. Even if the buffer was significantly reduced (e.g., 200 feet), approximately half or more of the 43.75-acre site would need to go undeveloped to protect the eucalyptus grove and provide adequate protection to the developed land uses. This significant reduction in developable area would likely result in the lack of interest on behalf of a private developer in building out the project site.</p>
CDFW-4	<p>The comment indicates that the EIR should fully address and analyze the cumulative impacts of the proposed project.</p> <p>Section 4.3, Biological Resources, has been revised to address cumulative biological impacts more fully. As presented in Section 4.3, Biological Resources, in the PRDEIR, which was published in January 2024, removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The information contained in the PRDEIR and this Final EIR is consistent with the information contained in this comment.</p> <p>While the application of the mitigation measures previously identified would reduce impacts to most species to less-than-significant levels, this is not the case for the monarch butterfly. The eucalyptus grove that is south of UVP is an important inland overwintering grove of the monarch butterfly. The CDFW has designated the project site as an area of high conservation value for monarch butterflies (Area of Conservation Concern HEX ID 50049) (CDFW 2023). The inland Santa Maria overwintering sites, including the overwintering site south of UVP at the Richards Ranch site, have always been aggregations of smaller numbers of individuals. However, they still provide a valuable ecological niche to the species. Removal of smaller overwintering roosts could force the congregation of monarch butterflies into larger colonies where stochastic events (e.g., disease, fire, grove removal, climate change) could significantly impact the species. For these reasons, the existing 7.63-acre overwintering site that is within the project site is considered significant habitat (CDFW 2023), and any removal or reduction of the grove would be considered cumulatively considerable and significant.</p> <p>With implementation of the identified mitigation measures, most residual cumulative biological resources impacts would be less than significant. However, development of the project site under the conceptual development plan or any project of a similar density would necessitate the removal of the 7.63-acre monarch overwintering site (mapped as #2688) that exists on the project site. Removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The CDFW is concerned that the loss of trees used by monarch butterflies for overwintering could contribute to extirpation of western monarch populations and has indicated that off-site mitigation is not feasible for the loss of overwintering habitat at the project site.</p> <p>Impacts cannot not be fully mitigated because there are no known local mitigation banks for monarch butterfly overwintering habitat, there is significant risk that restored off-site habitat would not be used by the monarch for overwintering, and there would be a significant temporal loss of the habitat while potential created or restored overwintering habitat matures. For these reasons, while mitigation is available through</p>

Comment No.	Response
	<p>supporting existing conservation efforts of established habitats that are actively managed by qualified conservation entities, the City determines that feasible mitigation measures are not available to fully reduce potentially significant impacts to the monarch butterfly from loss of habitat to a less-than-significant level. Thus, residual cumulative impacts to monarch butterflies would continue to be significant and unavoidable with the buildout of the conceptual development plan or of a project on the project site that is similar in density.</p>
CDFW-5	<p>The comment indicates that the EIR should evaluate how the project would impact the known overwintering monarch habitat on the project site, as well as how this would affect the regional and local overwintering populations. Further, the comment indicates that measures should be provided to mitigate the loss of an overwintering inland roost to ensure no net loss of overwintering roost habitat.</p> <p>As previously noted, because of the new information provided by this CDFW letter, revisions to the Draft EIR analysis were warranted. As presented in Section 4.3, Biological Resources, in the PRDEIR, which was published in January 2024, it is acknowledged that removal of the monarch butterfly overwintering habitat would create a significant and unavoidable impact that cannot be fully mitigated.</p>
CDFW-6	<p>The comment provides information about the detrimental effects of pesticides if used in close proximity to monarch butterflies and their overwintering habitat. The comment notes that pesticide use on the project site has the potential to impact monarch butterflies if the overwintering grove is retained. It further states that, if the on-site grove is removed, the monarch butterflies in the general vicinity that use landscape plants on the project site would be exposed to pesticides either by direct spray exposure or residually in pollen/nectar. The comment recommends that the EIR include measures that minimize/prohibit the use of synthetic pesticides and herbicides at the project site and that use of neonicotinoids, which may include nursery plants or seeds that have been treated with neonicotinoids, should be avoided. Further, the comment indicates that spraying pesticides within 1 mile of identified overwintering sites from mid-September to mid-March should be prohibited.</p> <p>In response to this comment, the following has been added to Mitigation Measure/BIO/mm-2.1, item (c):</p> <p>“As a condition of approval for the Planned Development permit(s), the use of neonicotinoids and synthetic pesticides shall be prohibited in the initial project plantings and throughout the life of the project in open space, pocket parks, and other common landscaped areas. This condition shall apply to the common open spaces for the life of the project and shall be included in the CC&amp;Rs which will be recorded against the property prior to the issuance of a first certificate of occupancy. In addition, Future residents and occupants shall be encouraged to not use neonicotinoids, synthetic pesticides, and/or plants treated with these materials; residents and occupants will be provided educational materials describing 1) viable alternatives to these products, and 2) the detrimental effects of these products on butterflies and other pollinators.</p>
CDFW-7	<p>The comment provides detailed information on California tiger salamander and indicates that CDFW is concerned with the potential for the project to impact California tiger salamander aquatic and upland habitat and with the potential for take of California tiger salamander to occur.</p> <p>There are known California tiger salamander breeding ponds approximately 1.4 miles west of SR 135 on airport lands and elsewhere mostly to the south. Historically, there was a closer breeding occurrence west of SR 135, but it has been extirpated. The entire area north of Foster Road all the way west to Blosser Road has been planted in strawberries (see DWE 2022; see EIR Volume 1, Appendix F). There is substantial residential development, active agriculture, and the four-lane SR 135 separating the project site from any known or potential breeding ponds, which are barriers to any California tiger salamander dispersal onto the project site. The USFWS maps the project site as outside of the western Santa Maria/Orcutt metapopulation and potential distribution (USFWS 2016). Additionally, curbs along Orcutt Road and portions of UVP represent additional barriers to California tiger salamander movement. For these reasons, the project site does not support upland dispersal or refuge habitat for California tiger salamander. A complete California tiger salamander site assessment report substantiating these findings was provided by DWE as an appendix to the Biological Resources Assessment (DWE 2022; see EIR Volume 1, Appendix F). After reviewing the California tiger salamander site assessment report, the USFWS has also provided feedback to the City that the agency is in agreement with the assessment report. Specifically, the USFWS indicates that UVP, SR 135, and other developed lands between the project and the breeding ponds west of SR 135 create an impermeable barrier for California tiger salamander dispersal and that the project area is not California tiger salamander upland habitat (USFWS 2023a).</p>
CDFW-8	<p>The comment indicates that CDFW believes that features at the project site are subject to Fish and Game Code Section 1600 et seq. and that these features may be impacted by the project. The comment indicates that the EIR states the project could result in impacts to features CDFW regulates under Section 1600 et seq. Additional detail is provided by the CDFW based on the presumption that wetland, riparian, or other regulated features exist at the project site.</p> <p>The comment is incorrect in stating that the EIR states that the project could result in impacts to features the CDFW regulates under Section 1600 et seq. To the contrary, page 4.3-36 of Section 4.3, Biological Resources, summarizes the wetlands and riparian analysis as follows:</p>

Comment No.	Response
	<p>No jurisdictional wetlands or other waters of the U.S./State or riparian habitat under any regulatory authority or definition occur on the project site. The very deep, excessively drained sandy soils of the project site have rapid permeability with low water capacity. A small area on the eastern edge of the project site—where there was once a stand of willows prior to its removal in 2021—in mapped in the NWI as a freshwater emergent marsh (USFWS 2022); however, a detailed wetland delineation and jurisdictional determination report provided by DWE (2022) did not find this area to be a jurisdictional wetland. Therefore, there would be no impact to state or federally protected wetlands.</p> <p>There are no features at the project site regulated by the CDFW under Section 1600 et seq. No revisions to the EIR analysis are required.</p>
CDFW-9	<p>This section of the letter provides the CDFW's additional recommendations (as opposed to the previous, project-specific recommendations). The CDFW's first recommendation is that a weed management plan should be developed for the project area and implemented both during and for at least 3 years after project implementation to provide for the avoidance of non-native weeds from becoming established both during and after construction.</p> <p>The City will consider these additional recommendations as potential conditions of approval for the Planned Development Permit(s), which would only occur if the annexation were approved by the City and the SBLAFCO.</p>
CDFW-10	<p>The CDFW's second recommendation is that native trees and shrubs are used for landscaping to benefit native wildlife such as insect pollinators. Further, the CDFW recommends planting native flowering species over non-native ornamental species where possible and that tropical milkweed should never be included in landscaping.</p> <p>This recommendation is consistent with several of the mitigation measures included in the EIR. Specifically, Mitigation Measure BIO/mm-2.1c prohibits the use of tropical milkweed and native milkweed species, such as narrowleaf milkweed. Further, native nectar-providing plant species are to be incorporated into landscaping following construction activities, such as those recommended in the Monarch Butterfly Nectar Plant List for Conservation Plantings, to enhance local nectar sources (Xerces Society 2018). In addition, Mitigation Measure BIO/mm-2.1d would require the developer to hire a City-approved biologist to address opportunities for on-site habitat enhancement, which would be required to be included within the project's future landscaping plans for review and approval by the City prior to implementation.</p>
CDFW-11	<p>The comment provides a summary of the filing fees due upon receipt of the Notice of Determination by the Lead Agency.</p> <p>This is not a comment on the analysis contained in the EIR; no response is necessary.</p>
CDFW-12	<p>The comment provides a conclusion to the CDFW letter.</p> <p>This is not a comment on the analysis contained in the EIR; no response is necessary.</p>
CDFW-13	<p>The CDFW has provided suggested language for the Mitigation Monitoring and Reporting Plan within Attachment A to the CDFW letter.</p> <p>While this attachment to the CDFW letter was helpful to the City, it does not reflect the exact language ultimately determined to be appropriate for the mitigation measures to be included in the Final EIR. Further, the MMRP for the Richards Ranch Annexation only includes mitigation measures that directly address potentially significant environmental impacts identified in the EIR. The MMRP for the project is contained in Chapter 7 of the EIR.</p>

## 1.2.4 County of Santa Barbara Public Works Department

**From:** Wilder, Marty <mwilder@countyofsb.org>  
**Sent:** Tuesday, January 3, 2023 2:34 PM  
**To:** Dana Eady <deady@cityofsantamaria.org>  
**Cc:** Thompson, Kevin <kethomp@countyofsb.org>  
**Subject:** Richards Ranch Development - CEQA Document Review

Hi Dana,  
Hope you are doing well.  
Just got the notice that the CEQA document was out for review.

SBPW-1

One error in wastewater services is on pages 2-6 to 2-7:  
If approved, the proposed annexation would formally transfer all local governmental powers and municipal services pertaining to the project site from the County to the City, including transferring the jurisdiction of the site from the Santa Barbara County Fire Department (SBCFD) to the Santa Maria Fire Department (SMFD).

SBPW-2

Upon annexation, the City would be responsible for providing land use and public works services, police and fire protection, library and general government services. The City would also be the Lead Agency for the provision of water through an agreement with Golden State Water Company (Golden State Water), which has water lines existing in the project site. Wastewater would also be the City's responsibility, with a joint-users agreement with Laguna County Sanitation District (LCSD). Richards Ranch Annexation Environmental Impact Report Chapter 2 Project Description 2-7 For this annexation to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to SBLAFCO for approval as a responsible agency. The EIR prepared for this project is intended to meet SBLAFCO's CEQA requirements for the proposed annexation.

SBPW-3

The wording in red is inaccurate. Laguna County Sanitation District is a governmental entity that operates within its service territory and this project is located within the Laguna County Sanitation District service boundary. This means that the District will provide wastewater services independently of the City of Santa Maria. That is, wastewater services are not the responsibility of the City of Santa Maria, only the District. The joint agreement mentioned does not include this area.

This may sounds like semantics but to LAFCO or between agencies, the wording should be accurate.

Table 4-14-6 seems to be quoting data used in the sewer system model. The sewer model was based on flow information prior to state mandated water conservation measures. A more appropriate set of data would be from our plant monitoring reports. The 2019 report is attached for consistency but I can send the 2021 if preferred.

SBPW-4

Marty



### 1.2.4.1 Response to Letter from County of Santa Barbara Public Works Department

Comment No.	Response
SBPW-1	The comment introduces the email. This is not a comment on the analysis contained in the EIR; no response is necessary.
SBPW-2	The comment indicates an inaccuracy in the Draft EIR on pages 2-6 to 2-7 of Chapter 2, Project Description. This inaccuracy has been corrected, as described in response to comment SBPW-3.
SBPW-3	The comment provides a recommended revision to the EIR text. This text has been corrected in this Final EIR to read:  The Applicant would also be responsible for purchasing supplemental water through a supplemental water agreement between the Applicant and the City of Santa Maria. Golden State Water, which has existing water lines adjacent to the project site underneath Orcutt Road, would then deliver water to the project site. Wastewater would continue to be the responsibility of the Laguna County Sanitation District (LCSD).
SBPW-4	The comment provides additional information regarding data used in the sewer system model, as summarized in Table 4.14-6 of Section 4.14, Utilities and Service Systems, of the EIR. The commenter indicates that the sewer model was based on flow information prior to state-mandated water conservation measures and that a more appropriate set of data would be the plant monitoring reports. In support of the comment, the commenter has provided the 2019 monitoring report so that an update to the table can be made.  EIR Table 4.14-6 has been updated in this EIR to reflect the information provided in the 2019 monitoring report.

## 1.2.5 Santa Barbara Local Agency Formation Commission

### LAFCO

---

**Santa Barbara Local Agency Formation Commission**

105 East Anapamu Street ♦ Santa Barbara CA 93101  
805/568-3391 ♦ FAX 805/568-2249  
www.sblafco.org ♦ lafco@sblafco.org

January 13, 2023

Dana Eady, Planning Manager  
City of Santa Maria  
110 South Pine Street, Rm 101  
Santa Maria, CA 93458  
deady@cityofsantamaria.org

SENT VIA EMAIL

Subject: Request for extension regarding comment due date of February 6, 2023 for  
Draft Environmental Impact Report (EIR) – Richards Ranch Annexation  
Project (AN2021-0001)

Dear Eady:

Thank you for the opportunity to comment on the draft Environmental Impact Report for the Richards Ranch Annexation. The Local Agency Formation Commission (LAFCO) respectfully request the City extend the comment period to allow LAFCO as a Responsible Agency under section 15381 to hold a Study Session on March 6, 2023 regarding Richard's Ranch Annexation project. The City may grant an extension of time for good cause and consent of the applicant in order to promote the interest of a responsible agency under CEQA section(s) 21100.2, 21151.5, & 21153 consistent with Government Code section 65361.

We appreciate being contacted with regard to this project and request the City grant extended time to allow for meaning discussion. If the extension should not be granted, any late comments should be included in the response to comments pursuant to section 15088 and not assumed LAFCO has no comments under section 15207. If you have any questions regarding our request, please contact me at 805-568-3391.

Sincerely,



Mike Prater  
LAFCO Executive Officer

cc. Commissioners  
William Dillon, LAFCO Counsel

---

**Commissioners:** Vacant ♦ Cynthia Allen ♦ Jay Freeman, Vice-Chair ♦ Craig Geyer ♦ Joan Hartmann, Chair ♦ Bob Nelson  
♦ Jenelle Osborne ♦ Alice Patino ♦ Jim Richardson ♦ Shane Stark ♦ Das Williams **Executive Officer:** Mike Prater

LAFCO1-1

## LAFCO

**Santa Barbara Local Agency Formation Commission**  
105 East Anapamu Street ♦ Santa Barbara CA 93101  
805/568-3391 ♦ FAX 805/568-2249  
www.sblafco.org ♦ lafco@sblafco.org

March 6, 2023

Dana Eady, Planning Manager  
City of Santa Maria  
110 South Pine Street, Rm 101  
Santa Maria, CA 93458  
deady@cityofsantamaria.org

SENT VIA EMAIL

Subject: Comments on Draft Environmental Impact Report (EIR) –  
Richards Ranch Annexation Project (AN2021-0001)

Dear Eady:

Thank you for the opportunity to comment on the draft Environmental Impact Report for the Richards Ranch Annexation. The Local Agency Formation Commission (LAFCO) provided a Notice of Preparation letter regarding this project on February 23, 2022 which outlined the scope and content needed for LAFCO to use as a Responsible Agency in considering a future annexation of the project to the City. Thank you for taking the time to discuss the project with us on December 16, 2022. The most recent Municipal Service Review and Sphere of Influence Update scheduled for approval in April 2023 by LAFCO may be useful in preparing the final EIR. On March 2, 2023 the Local Agency Formation Commission conducted a Study Session regarding the Draft Environmental Impact Report for Richard's Ranch Annexation. The LAFCO Commission heard from members of the public and the developer's team. The Commission also considered the information in the staff report. The LAFCO Commission voted 4-2 directing LAFCO staff to submit our comments.

LAFCO 2-1

The following comments are offered with the understanding CEQA §15204 requires public agencies to focus on the sufficiency of the document and provide suggestions to analyze and/or provide better ways to avoid or mitigate the environmental effects. One of the basic purposes of the Draft EIR is to be used in a possible future annexation thereby involving LAFCO as a Responsible Agency CEQA §15096. It is LAFCO's inclination the City will consider LAFCO's comments and provide a reasonable response per CEQA §15088. After the comments are considered and addressed LAFCO would expect the Draft EIR to be re-released per CEQA §15088.5 for public review. Please consider the following comments:

LAFCO 2-2

LAFCO 2-3

**Commissioners:** Cynthia Allen ♦ Jay Freeman, Vice-Chair ♦ Craig Geyer ♦ Joan Hartmann, Chair ♦ James Kyriaco ♦ Bob Nelson  
♦ Jenelle Osborne ♦ Alice Patino ♦ Jim Richardson ♦ Shane Stark ♦ Das Williams **Executive Officer:** Mike Prater

1. **General Comment.** The annexation of undeveloped property within the Orcutt Community Plan should contemplate how the City of Santa Maria will set the stage for other territory within their Sphere of Influence might be added in subsequent future applications. This application and all future applications should foster an orderly development pattern that would not create a potential divided community of service providers, efficient service model with particular attention to costs for such services. As currently proposed, the property would be served by four different entities (Golden State Water Company for water, Laguna County Sanitation for sewer, County Fire as first responders, and City for all other services). This has the potential of creating a different class of residents within the City limits. The Cortese-Knox-Hertzberg Act (CKH Act) and Santa Barbara LAFCO local policies strive for an effective local government structure that takes into consideration the need for enhanced urban services, cost and adequacy of those services where services and improvements can be provided and financed. The desire for urban level services would preferably be provided by a single agency versus a number of small providers which could enhance efficient provisions of urban services. These elements should be evaluated and discussed in the EIR to avoid gaps in the CEQA record for LAFCO's use and should be addressed in the Response to Comments, the Final EIR, and if necessary, use of the Cities conditioning authority to meet necessary compliance.
 

LAFCO 2-4
2. **LAFCO's comments** were submitted as part of the Notice of Preparation process and were focused on the annexation process and analysis of local policies. The DEIR Chapter 4.9.2.4 under *Consistency with Applicable Plans and Policies* generally lists SB/LAFCO policies and standards for Spheres of Influence and standards for annexations to Cities, favorable and unfavorable factors. Several other policies and factors are not listed and therefore not evaluated in the DEIR. These include:
 

LAFCO 2-5

  - a. Section 7 III POLICIES ENCOURAGING CONSISTENCY WITH SPHERES OF INFLUENCE # (2) which state *"Already developed unincorporated lands located within the established sphere of influence boundary of a city and which benefit from municipal services provided by such city should be annexed to that city. Vacant land in the same position should be annexed prior to development. LAFCO recognizes that costs for serving some developed unincorporated areas, when studied independently, may exceed revenues. In other cases, revenues will exceed service costs. To the fullest extent possible, cities should develop programs that propose annexation of several areas which, if combined together, achieve a net balance in city costs and revenues."* This policy recognizes some development of unincorporated areas may exceed revenues, but a balance is desired.
 

LAFCO 2-6
  - b. Section 7 IV POLICIES ENCOURAGING ORDERLY URBAN DEVELOPMENT AND PRESERVATION OF OPEN SPACE PATTERNS # (1) which state *"The Commission encourages well planned, orderly, and efficient urban development patterns for all developing areas. Also, the county, cities, and those districts providing urban services, are encouraged to develop and implement plans and policies which will provided for well-planned, orderly and efficient urban development patterns, with consideration of preserving permanent open space lands within those urban patterns."* Focus here being on implementation of plans and policies which will provided for well planned, orderly and efficient urban needs.
 

LAFCO 2-7
  - c. Section 7 VI standards for annexations to Cities, favorable factors # (2, 3 & 4) which are listed in the DEIR, however stronger determination should be given. These factors
 

LAFCO 2-8

relate to #3 "Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services". And, #11 "Boundaries of proposed annexation do not include logical service area or are otherwise improperly drawn." Having four providers to serve this relatively small site may not be the best approach. Generally, if the City were the sole provider for all serves the public would have a better understanding of their service provider making it easier for the public to gain public access and allow greater government accountability.

LAFCO 2-8  
(cont'd)

- d. Other Factors not discussed include Commissioner Handbook Appendix A LAFCO Proposal Review Factors - Government Code 56668 factors a-q. Of particular note are the following factors:

**Factor (b)** The need for organized community services, the present cost and adequacy of governmental services and controls in the area, probable future needs for those services and controls, probable effect of the proposed incorporation, formation, annexation, or exclusion and alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas.

**Factor (c)** The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county.

**Factor (d)** The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities set forth in Section 56377.

**Policy 1.** Any proposal for a change or organization or reorganization shall contain sufficient information to determine that adequate services, facilities, and improvements can be provided and financed by the agencies responsible for the provision of such services, facilities, and improvements.

LAFCO 2-9

**Policy 4.** Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.

**Policy 6.** Where possible, a single larger agency rather than a number of adjacent smaller ones, established for a given service in the same general area, will be preferred.

**Policy 7.** Reorganization of overlapping and competing agencies or the correction of illogical boundaries dividing agency service areas is recommended. The Commission encourages reorganizations, consolidations, mergers, or dissolutions where the result will be better service, reduced cost, and/or more efficient and visible administration or services to the citizens.

**Factor (j)** The comments of any affected local agency or other public agency.

**Factor (m)** The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined

by the appropriate council of governments consistent with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7.

↑ LAFCO 2-9  
(cont'd)

3. **Water Resource comments.** The DEIR Section 4.14 Utilities and Service Systems documents the Golden State Water Company's current supply and demand. The DEIR Appendix K Water Supply Assessment (Todd Report) discusses the proposed projects demands. These documents outline the need for Supplemental Water and the requirement states "GSWC has existing agreements to obtain additional imported water from the City and uses SWP water wheeled through the City. The projects potable water demand would be 149.05 AFY". The Water Supply Assessment documents the "GSWC UWMP documents water sources, water demands, water reliability planning, and water demand management through 2045." This assessment report also states "By 2045, total water demands are expected to increase by 21 percent, driven by increases in residential and commercial uses." The Todd Report concludes "The City has adequate supplemental water from their existing allocation to provide for this Project when annexed. Agreement details would need to be formalized and would occur after annexation." As outlined below under Alternatives should evaluate all services (including water) provided by the City of Santa Maria as the public governmental entity. Supplemental water is required and being provided by the City anyways through an agreement because GSWC does not have an adequate supply without the additional City water. LAFCO will want to better understand any formalized agreement before annexation, not after. As a public governmental entity, the City offers the public a greater understanding of their rights and regulatins that is more open to accountability and statues customary to the public, than does a private water company regulated by the Public Utilities Commission.

↑ LAFCO 2-10

4. **Affordable Housing & RHNA comments.** The DEIR states the project would not result in substantial unplanned population growth; impacts would be less than significant in the areas of Population/Housing. The DEIR Section 4.11 Population and Housing cites on page 4.11.3 the Regional Housing Needs Allocation from the 5<sup>th</sup> cycle that covers the period between 2014 to 2022. The impact assessment also provides analysis based on the 5<sup>th</sup> cycle. This proposed project would fall under the 6<sup>th</sup> cycle. Although the Cities draft Housing Element for period 2023-2031 does not consider or identify additional land inventory needs outside of the exiting City limits to meet their RHNA, this project could assist in adding more affordable housing units to an already limited affordable housing stock within the City. Additionally, as mentioned above under Factor (m) discussion regarding the effect on Cities and County in achieving their respective fair shares of the regional housing needs will need to be considered by LAFCO under the 6<sup>th</sup> cycle. A potential transfer of RHNA may be part of property tax exchange negotiation process.

↑ LAFCO 2-11

On page 4.9-35 of the DEIR, it states "While the project is not proposing units that are categorized as affordable units through deed restriction, the project does allow for the future housing that would provide more affordable options to the community. The project would diversify the range of housing types available in the city by increasing the available housing supply for apartments and condominiums which are in most cases more affordable than single family dwellings." No additional analysis is provided that documents the current cost for the proposed housing supply type to compare if such diversity and range of types are truly achieving affordability.

↑ LAFCO 2-12

DEIR page 5.4 under Section 5.3.1 Affordable Housing Component Alternative scenario was rejected from further review. The DEIR also states "It is important to note that a later application could be submitted for this type of development and the City could consider

↑ LAFCO 2-13

an addendum or supplemental analysis to this EIR at that time.” Other important LAFCO Policies include the importance of affordable housing and economically sound service capabilities. The LAFCO Commission at its broad discretion can determine if annexations sufficiently address these topics. The City may want to consider evaluating an alternative that considers an affordable housing component. Greater analysis within the EIR should be evaluated that includes the 6<sup>th</sup> cycle.

↑  
LAFCO 2-13  
(cont'd)

5. **Fire Service Comments.** The DEIR Section 4.12 Public Services and Recreation documents the existing conditions for both City Fire Station 6 and new County Fire Station 25. The DEIR concludes on page 4.12-14 “Service to the project site is dependent on the mutual aid agreement between SMFD and SBCFD.” “Average response times from SMFD Stations 2 and 4 to the project site would exceed the performance goal response time due to station location and distance from the site. However, SBCFD Station 21 is located 1.7 miles southwest of the project site and is within the 4-minute travel time response.: ...however, response times to the project site are less than ideal under current conditions from the SMFD location. This is largely because the closest SMFD station, the Santa Maria Airport Fire Station 6, has very limited equipment and staffing and cannot serve emergencies outside of the airport property. Because of this current condition, under mutual aid agreements, the SBCFD Station 21 would be the most likely first responder in most emergency situations at the project site.” Per NOP response letter from Deputy Chief Rob Heckman dated February 25, 2022 Mr. Heckman states “At this time the SBCFD does not believe the proposed project is in the best interest of the residents and property owners of the unincorporated Orcutt community and has the potential to result in a significant negative impact to public safety. The proposed annexation would remove four parcels from the Santa Barbara County Fire Protection District that are currently providing property tax revenue into the Fire District.” As mention above under Factor (j) comments from affected local agencies must be addressed by LAFCO. The EIR should evaluate the project impacts and mitigations necessary for SMFD service from Station 6.

↑  
LAFCO 2-14

6. **Alternatives Analysis.** LAFCO would request an Alternative be evaluated that considers full City services being provided. In light of the City Managers email received on December 29, 2022 stating in part “We just would like to continue to urge LAFCO to promote orderly development in Santa Maria Valley into the City of Santa Maria to avoid situations such as underinvestment in infrastructure (Tanglewood, Saint Marie, Ray Water), lack of safe resources (the “agricultural” industrial areas east of the City that lack healthy water supply), and lack of municipal services (in Orcutt) or duplication of services (fire services) that end up requiring the City of Santa Maria to invest in improvements after-the-fact rather than constructing the public improvements and municipal services to City standards at the outset.” We would agree that full City services from the outset would enhance urban services and set the stage for future infrastructure to be in place as the City considers annexation into their Sphere of Influence southerly into Orcutt. This could alleviate multiple service providers for future City residents and businesses. Thus, LAFCO requests the City evaluate this Alternative, which places the City as full-service provider for water, wastewater, and fire services that utilizes City infrastructure and municipal services to City standards.

↑  
LAFCO 2-15

7. **Deed Restrictions.** Please outline any specific deed restrictions applicable to the annexation site.

↑  
LAFCO 2-16

8. **Impacts to Orcutt Community Plan & Program FEIR.** The LAFCO Commission has requested the City provide analysis related to impacts to the Orcutt Community Plan and

↓  
LAFCO 2-17

Program FEIR and any identified mitigation as a result of Richard's Ranch development proposal. In addition to the general impacts related to the overall Orcutt Community Plan and FEIR the following specific impact analysis would assist the Commission.

- a. How does the Richard's Ranch development proposal impact or enhance the future Union Valley Parkway extension and/or overpass as outlined in the Orcutt Community Plan along with any noise related impacts.
- b. How does the Richard's Ranch development proposal impact or enhance any bikeway and safety plans as outlined in the Orcutt Community Plan.
- c. How does the Richard's Ranch development proposal impact or enhance any recreation opportunities as outlined in the Orcutt Community Plan.

↑  
LAFCO 2-17  
(cont'd)

9. **School Enrollment.** The LAFCO Commission has requested the City provide analysis related to school enrollment impacts as a result of the Richard's Ranch increased housing density under the annexation proposal.

↑  
LAFCO 2-18

10. The LAFCO Commission would like a better understanding of the City's intentions as they relate to the City's Sphere of Influence covering the Orcutt Community. Has the City considered and or adopted any policies for the existing SOI boundary, in particular any goals, policies, objectives, or implementation programs covering Orcutt area specifically.

↑  
LAFCO 2-19

We appreciate being contacted with regard to this project. If you have any questions regarding these comments, please me at 805-568-3391.

Sincerely,



Mike Prater  
LAFCO Executive Officer

cc. Commissioners  
William Dillon, LAFCO Counsel



### 1.2.5.1 Response to Letters from Santa Barbara Local Agency Formation Commission

Comment No.	Response
LAFCO 1-1	<p>This letter from the SBLAFCO, dated January 13, 2023, requests an extension of time in order to promote the interest of SBLAFCO as a Responsible Agency. The letter further indicates that the SBLAFCO Commission intended to hold a study session on March 6, 2023, and that SBLAFCO would like to submit their comments after the study session is held.</p> <p>The City granted this extension to SBLAFCO. The Responsible Agency's comments are provided as a second letter dated March 6, 2023, which are responded to in the following response to comments.</p>
LAFCO 2-1	<p>The comment provides introductory comments to the comment letter and indicates that the SBLAFCO provided a letter in response to the Notice of Preparation (February 23, 2022), expresses appreciation of the City for taking the time to discuss the proposed project on December 16, 2022, and further indicates that the SBLAFCO held a study session regarding the Draft EIR. At the study session, the SBLAFCO Commission heard from members of the public and the developer's team, and then directed SBLAFCO staff to submit comments; the letter received and responded to below are the comments received by the City as a result of this process.</p> <p>This comment does not provide a specific comment on the analysis contained in the EIR; no further response is necessary.</p>
LAFCO 2-2	<p>SBLAFCO introduces the comments provided within the context that the State CEQA Guidelines Section 15204 requires public agencies to focus on the sufficiency of the document and provide suggestions to analyze and/or provide better ways to avoid or mitigate the environmental effects and that the EIR is to be used by SBLAFCO as a Responsible Agency in accordance with State CEQA Guidelines Section 15096. The following provides the specific language of the State CEQA Guidelines Sections referenced by the commenter.</p> <p>Section 15204. FOCUS OF REVIEW</p> <p>(a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.</p> <p>(b) <i>[Applicable to Negative Declarations.]</i></p> <p>(c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.</p> <p>(d) Reviewing agencies or organizations should include with their comments the name of a contact person who would be available for later consultation if necessary. Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.</p> <p>(e) This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.</p> <p>(f) Prior to the close of the public review period for an EIR or mitigated negative declaration, a responsible or trustee agency which has identified significant effects on the environment may submit to the lead agency proposed mitigation measures which would address those significant effects. Any such measures shall be limited to impacts affecting those resources which are subject to the statutory authority of that agency. If mitigation measures are submitted, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for the mitigation measures, or shall refer the lead agency to appropriate, readily available guidelines or reference documents which meet the same purpose.</p>

Comment No.	Response
	<p>Section 15096. PROCESS FOR A RESPONSIBLE AGENCY</p> <p>(a) General. A Responsible Agency complies with CEQA by considering the EIR or Negative Declaration prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved. This section identifies the special duties a public agency will have when acting as a Responsible Agency.</p> <p>(b) Response to Consultation. A Responsible Agency shall respond to consultation by the Lead Agency in order to assist the Lead Agency in preparing adequate environmental documents for the project. By this means, the Responsible Agency will ensure that the documents it will use will comply with CEQA.</p> <p>(1) In response to consultation, a Responsible Agency shall explain its reasons for recommending whether the Lead Agency should prepare an EIR or Negative Declaration for a project. Where the Responsible Agency disagrees with the Lead Agency's proposal to prepare a Negative Declaration for a project, the Responsible Agency should identify the significant environmental effects which it believes could result from the project and recommend either that an EIR be prepared or that the project be modified to eliminate the significant effects.</p> <p>(2) As soon as possible, but not longer than 30 days after receiving a Notice of Preparation from the Lead Agency, the Responsible Agency shall send a written reply by certified mail or any other method which provides the agency with a record showing that the notice was received. The reply shall specify the scope and content of the environmental information which would be germane to the Responsible Agency's statutory responsibilities in connection with the proposed project. The Lead Agency shall include this information in the EIR.</p> <p>(c) Meetings. The Responsible Agency shall designate employees or representatives to attend meetings requested by the Lead Agency to discuss the scope and content of the EIR.</p> <p>(d) Comments on Draft EIRs and Negative Declarations. A Responsible Agency should review and comment on draft EIRs and Negative Declarations for projects which the Responsible Agency would later be asked to approve. Comments should focus on any shortcomings in the EIR, the appropriateness of using a Negative Declaration, or on additional alternatives or mitigation measures which the EIR should include. The comments shall be limited to those project activities which are within the agency's area of expertise or which are required to be carried out or approved by the agency or which will be subject to the exercise of powers by the agency. Comments shall be as specific as possible and supported by either oral or written documentation.</p> <p>(e) Decision on Adequacy of EIR or Negative Declaration. If a Responsible Agency believes that the final EIR or Negative Declaration prepared by the Lead Agency is not adequate for use by the Responsible Agency, the Responsible Agency must either:</p> <p>(1) Take the issue to court within 30 days after the Lead Agency files a Notice of Determination;</p> <p>(2) Be deemed to have waived any objection to the adequacy of the EIR or Negative Declaration;</p> <p>(3) Prepare a subsequent EIR if permissible under Section 15162; or</p> <p>(4) Assume the Lead Agency role as provided in Section 15052(a)(3).</p> <p>(f) Consider the EIR or Negative Declaration. Prior to reaching a decision on the project, the Responsible Agency must consider the environmental effects of the project as shown in the EIR or Negative Declaration. A subsequent or supplemental EIR can be prepared only as provided in Sections 15162 or 15163.</p> <p>(g) Adoption of Alternatives or Mitigation Measures.</p> <p>(1) When considering alternatives and mitigation measures, a Responsible Agency is more limited than a Lead Agency. A Responsible Agency has responsibility for mitigating or avoiding only the direct or indirect environmental effects of those parts of the project which it decides to carry out, finance, or approve.</p> <p>(2) When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment. With respect to a project which includes housing development, the Responsible Agency shall not reduce the proposed number of housing units as a mitigation</p>

Comment No.	Response
	<p>measure if it determines that there is another feasible specific mitigation measure available that will provide a comparable level of mitigation.</p> <p>(h) Findings. The Responsible Agency shall make the findings required by Section 15091 for each significant effect of the project and shall make the findings in Section 15093 if necessary.</p> <p>(i) Notice of Determination. The Responsible Agency should file a Notice of Determination in the same manner as a Lead Agency under Section 15075 or 15094 except that the Responsible Agency does not need to state that the EIR or Negative Declaration complies with CEQA. The Responsible Agency should state that it considered the EIR or Negative Declaration as prepared by a Lead Agency.</p> <p>While the sections referenced by the commenter are helpful context, and as such have been reflected in this response to comment, this comment does not provide any specific feedback on the EIR. No additional response is necessary.</p>
LAFCO 2-3	<p>This introduction to the specific comments enumerated in the SBLAFCO letter indicates that it is SBLAFCO's belief that the City will provide a reasonable response to SBLAFCO's comments per State CEQA Guidelines Section 15088 and that SBLAFCO anticipates that the Draft EIR will be required to be re-released in accordance with State CEQA Guidelines Section 15088.5 for public review.</p> <p>The State CEQA Guidelines Section 15088 provides guidance to Lead Agencies regarding responding to comments that have been received on a Draft EIR. Specifically, this section of the CEQA Guidelines emphasizes that the Lead Agency shall evaluate and respond to comments "raising significant environmental issues" received during the comment period and that the written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency's position is at variance with recommendations and objections raised in the comments must be addressed giving reasons why specific comments and suggestions were not accepted. Among other points, this section indicates that level of detail contained in the responses can vary and also clarifies that a general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment.</p> <p>The State CEQA Guidelines Section 15088.5 provides direction to Lead Agencies regarding when recirculation of all or part of a Draft EIR may be required. Recirculation of a Draft EIR is only required when "significant new information" needs to be added to the EIR. As noted in this section of the State CEQA Guidelines, the term "information" can include changes in the project or environmental setting as well as additional data or other information, however, new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a "substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." Recirculation is not required where the new information added to the EIR merely clarifies or makes insignificant modifications in an adequate EIR.</p> <p>These clarifications are important in context to the responses provided to the remaining comments received in SBLAFCO's letter. SBLAFCO asks for several revisions to the EIR that are not related to environmental issues or a "substantial adverse environmental effect." There are many policy considerations related to SBLAFCO's consideration of the project that may be important from a policy and consistency standpoint, but do not fall within the scope of a CEQA analysis. This background supports the City's response to many of the comments below.</p> <p>It is also important to note that the City determined that a partial, but not a full, recirculation of the Draft EIR was necessary under State CEQA Guidelines 15088.5. The PRDEIR, released in January 2024, addresses two key subjects: 1) addressing monarch butterfly habitat that occurs on-site, and 2) describing and providing analysis of an additional project alternative, the No Project/No Annexation alternative. Some additional background on these two areas that were the focus of the PRDEIR is provided in the following paragraphs.</p> <p>Following receipt of a March 14, 2023, comment letter from the CDFW, the City revised its findings regarding the existing 7.63-acre overwintering site that is within the project site boundaries. Because of the new information provided, revisions to the recommended mitigation measures for the monarch butterfly were warranted. Additionally, the conclusion regarding the impacts following implementation of the mitigation measures required revision. As presented in Section 4.3, Biological Resources, of the PRDEIR, which was published in January 2024, removal of this habitat would create a significant and unavoidable impact that cannot be fully mitigated. The information contained in the PRDEIR and this Final EIR is consistent with the information contained in these comments by CDFW.</p> <p>In addition, the County, in their comments on the Draft EIR, indicated that an additional No Project Alternative be considered. Per these comments, the County requested that an alternative be analyzed that considers the continuation of the County plans and policies that apply to the site by projecting what could be developed under the current County Specific Plan (Richard's Specific Plan [83-SP-1]). To respond to this County comment, the City added Alternative 4, No Project/No Annexation with Orcutt Community Plan Buildout, to the alternatives analysis. Under this alternative, the project as proposed by the Applicant would</p>

Comment No.	Response
	<p>not be developed and annexation of the project site into the city of Santa Maria would not occur. Instead, the project site would remain in the jurisdictional boundaries of the County. Under this alternative, allowable development of the project site would be consistent with the land use and zoning as described in the County's Orcutt Community Plan (2022). The City also considered the potential environmental effects of this alternative as compared to the proposed project in the PRDEIR.</p> <p>The revisions made in the PRDEIR are now reflected in this Final EIR. In addition, additional minor changes to the EIR have been made herein that do not meet the recirculation requirements of State CEQA Guidelines Section 15088.5 (i.e., they do not add new information related to a "substantial adverse environmental effect.")</p>
LAFCO 2-4	<p>The comment indicates that the annexation of undeveloped property within the boundaries of the County's OCP should contemplate how the City of Santa Maria will set the stage for how other territory within their SOI might be added in subsequent future applications and that an orderly development pattern that does not divide community of service providers should be provided. The comment notes that as currently proposed, the property would be served by four different entities (Golden State Water, LCSD, County Fire as first responder, and the City for all other services). SBLAFCO opines that this has the potential of creating a different class of residents within the City limits and that the Cortese-Knox-Hertzberg Act and SBLAFCO local policies strive for an effective local government structure that takes into consideration the need for enhanced urban services, cost, and adequacy of those services where services and improvements can be provided and financed. The comment opines that these elements should be evaluated and discussed in the EIR to avoid gaps in the CEQA record for SBLAFCO's use.</p> <p>While these are important policy considerations, they are not necessarily within the scope of an EIR analysis. As noted by the responses to the previous comments and the State Guideline citations and references provided, CEQA and the State CEQA Guidelines direct Lead Agencies to focus their EIR analysis on environmental issues. Similarly, the State CEQA Guidelines direct Responsible Agencies to focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. The following definitions, found within the State CEQA Guidelines, provide helpful context:</p> <p>15360. ENVIRONMENT</p> <p>"Environment" means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.</p> <p>15382. SIGNIFICANT EFFECT ON THE ENVIRONMENT</p> <p>"Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.</p> <p>It is SBLAFCO's responsibility to determine consistency with their own policies. The City offers great deference to SBLAFCO in determining consistency with the Cortese-Knox-Hertzberg Act and SBLAFCO local policies. SBLAFCO has unique competence to interpret these policies when applying them to its adjudicatory capacity. It is also recognized that the SBLAFCO policies reflect a range of competing interests and SBLAFCO should solely be allowed to weigh and balance their discretion to construe its policies when applying them.</p>
LAFCO 2-5	<p>The comment indicates that SBLAFCO comments that were submitted as part of the Notice of Preparation process and were focused on the annexation process and analysis of local policies and that the EIR Section 4.9.2.4, Consistency with Applicable Plans and Policies, generally lists SBLAFCO policies and standards for SOIs and standards for annexations to cities with favorable and unfavorable factors. SBLAFCO points out, however, that several other policies and factors are not listed and therefore not evaluated in the EIR and then goes on to enumerate and quote the specific policies.</p> <p>As noted in the introduction to Section 4.9.2.4 of the EIR, Table 4.9-5 lists applicable plans and policies pertaining specifically to land use and planning that were "adopted for the purpose of avoiding or mitigating an environmental effect and a preliminary evaluation of the project's consistency with the guidelines and requirements detailed therein." This approach is consistent with the State CEQA Guidelines Section 15125(d) and the environmental checklist questions in Appendix G of the State CEQA Guidelines. The CEQA interest in policy consistency is narrower than the consideration of the analysis of policy consistency that is required for the annexation to be successfully approved by the City and the SBLAFCO Commission.</p> <p>As such, the EIR has not been revised in response to this comment. However, in an effort to be proactive and provide additional information to SBLAFCO, the City has prepared a preliminary analysis of the project's</p>

Comment No.	Response
	<p>consistency with SBLAFCO policies and factors identified in this and the following comments, which is provided in EIR Volume 2, Appendix B.</p> <p>The analysis in EIR Volume 2, Appendix B, supplements EIR Section 4.9.2.4 and Table 4.9-4. However, it does not affect the CEQA analysis for the annexation. Further, it is not the City's responsibility to determine consistency with SBLAFCO policies. For that reason, this analysis is only provided as a preliminary or potential consistency analysis. The City offers great deference to SBLAFCO in determining consistency with their own policies. In other words, different determinations by SBLAFCO may be made. SBLAFCO has unique competence to interpret their own policies when applying them.</p>
LAFCO 2-6	<p>The comment provides specific information on the additional policies and factors that SBLAFCO would like the City to consider.</p> <p>Refer to response to comment LAFCO 2-5 and EIR Volume 2, Appendix B.</p>
LAFCO 2-7	<p>The comment provides specific information on the additional policies and factors that SBLAFCO would like the City to consider.</p> <p>Refer to response to comment LAFCO 2-5 and EIR Volume 2, Appendix B.</p>
LAFCO 2-8	<p>The comment provides specific information on the additional policies and factors that SBLAFCO would like the City to consider.</p> <p>Refer to response to comment LAFCO 2-5 and EIR Volume 2, Appendix B.</p>
LAFCO 2-9	<p>The comment provides specific information on the additional policies and factors that SBLAFCO would like the City to consider.</p> <p>Refer to response to comment LAFCO 2-5 and EIR Volume 2, Appendix B.</p>
LAFCO 2-10	<p>The comment provides a summary of the information that is contained in the EIR regarding the provision of water supply. After providing this information, the commenter then indicates that SBLAFCO will want to better understand any formalized supplemental water agreement before annexation, not after.</p> <p>The City has a standard supplemental water agreement that is used when property owners apply to purchase supplemental water from the City of Santa Maria. Applications for the purchase of supplemental water are reviewed by the City and the City has the discretion to approve or deny applications. In the past, the City has elected to not provide supplemental water to proposed commercial development on the Richards Ranch site. Prior to the supplemental water agreement being finalized, the City Council would need to adopt a Resolution of Application to Initiate Annexation, including Adoption of a Plan for Services (Resolution), which would occur after EIR certification. If the Resolution is approved by the City Council, then the supplemental water agreement would be developed in draft form. This would occur prior to, and included within, the application for review and consideration of approval of the proposed annexation, which would be submitted to the SBLAFCO to initiate annexation proceedings. The supplemental water agreement would only be finalized if annexation were to be approved by SBLAFCO.</p>
LAFCO 2-11	<p>The comment provides input on affordable Housing and the RHNA. As noted in this comment, the EIR concludes that the project would not result in substantial unplanned population growth and EIR Section 4.11, Population and Housing cites the RHNA from the 5<sup>th</sup> cycle that covers the period between 2014 to 2022. The comment notes that the proposed project would fall under the 6<sup>th</sup> cycle. SBLAFCO further notes that, as mentioned above under Factor (m) discussion regarding the effect on Cities and County in achieving their respective fair shares of the regional housing needs would need to be considered by SBLAFCO under the 6<sup>th</sup> cycle and SBLAFCO indicates that a transfer of RHNA may be part of property tax exchange negotiation process.</p> <p>This comment correctly portrays the EIR analysis related to growth inducement. Further, the comment is correct that the Draft EIR included reference to the 5<sup>th</sup> cycle RHNA. Since publication of the Draft EIR, the 6<sup>th</sup> cycle RHNA has been finalized as has the most recent City Housing Element addressing the 6<sup>th</sup> cycle RHNA. The EIR has been updated in this Final EIR to reflect this updated information. The considerations that SBLAFCO presents as being with their Responsible Agency responsibilities and the elements that will be considered in a possible future tax exchange negotiation process, should the project progress, are noted. No further revisions to the EIR are necessary because of this comment.</p>
LAFCO 2-12	<p>The comment quotes a section of the EIR that states the following: "While the project is not proposing units that are categorized as affordable units through deed restriction, the project does allow for the future housing that would provide more affordable options to the community. The project would diversify the range of housing types available in the city by increasing the available housing supply for apartments and condominiums which are in most cases more affordable than single family dwellings." The comment further notes that no additional analysis is provided that documents the current cost for the proposed housing supply type to compare if such diversity and range of types are truly achieving affordability.</p> <p>The comment is correct. Additional analysis regarding the current cost for the proposed housing supply type is not required to complete a CEQA evaluation. As noted in response to comment LAFCO 2-4, economic or social change by itself shall not be considered a significant effect on the environment, and the focus of the</p>

Comment No.	Response
	EIR is on "environmental" effects. If SBLAFCO requires additional information regarding the costs of the proposed housing supply and/or whether the supply would achieve affordability, this information can be provided by the Applicant and/or the City outside of the CEQA process.
LAFCO 2-13	<p>The comment notes that an affordable housing component alternative was rejected from the CEQA alternatives analysis and quotes the following information from the EIR: "it is important to note that a later application could be submitted for this type of development and the City could consider an addendum or supplemental analysis to this EIR at that time." The comment notes that other important SBLAFCO policies include the importance of affordable housing and economically sound service capabilities and that the SBLAFCO Commission at its broad discretion can determine if annexations sufficiently address these topics. SBLAFCO further indicates that the City may want to consider greater analysis within the EIR to address these topics, including 6th cycle RHNA.</p> <p>This comment does not raise a substantive issue relevant to the environmental analysis. It is recognized that the SBLAFCO policies reflect a range of competing interests and SBLAFCO is allowed to weigh and balance their discretion when applying the agency's responsibilities. This comment may be relevant for consideration in the subsequent project approval process; however, it does not require revisions to the EIR. It should also be noted that the Richards Ranch project site is not identified in the most recently adopted City Housing Element as a site that is necessary for housing construction for the City to meet its RHNA as allocated by the 6<sup>th</sup> cycle.</p>
LAFCO 2-14	<p>The comment summarizes sections of the EIR regarding fire and emergency services. In addition, the comment references and quotes a Notice of Preparation letter from Deputy Chief Rob Heckman of the SBCFD. The letter from the SBCFD indicates that the department does not believe the proposed project is in the best interest of the residents and property owners of the Orcutt community and has the potential to result in a significant negative impact to public safety.</p> <p>The EIR adequately analyzes the need for fire protection facilities and the associated environmental impacts of providing those services within the intended scope of CEQA. The analysis of fire protection services provided in Section 4.12.5 indicates that the project would not require the provision of new or physically altered fire protection facilities due to mutual aid agreements with the SBCFD. Additionally, the annexation of the project site into the SMFD jurisdictional boundaries would include coordination with the County and the City to identify a fair and appropriate Property Tax Sharing Agreement. It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined. See also Master Response 1, Public Services – Emergency Services.</p>
LAFCO 2-15	<p>The comment requests that the City evaluate an alternative which would provide full City services with the presumption that providing new infrastructure to serve areas currently not served by the City would alleviate the need for multiple service providers for future City residents and businesses. As proposed, upon annexation the project site would primarily be served by the City of Santa Maria (e.g., fire services; police services; streets, roadways, and other related public works; parks; library; and general governmental services). The property owner would also be responsible for providing supplemental water to Golden State Water through a supplemental water agreement between the City and Golden State Water. As proposed, only water and wastewater services would not be provided by the City. Golden State Water, which already has service lines adjacent to the project site underneath Orcutt Road, would deliver water to the project site. The applicant has obtained a preliminary Can and Will Serve letter (Dated September 21, 2023) that states that Golden State Water Company will be able to provide domestic and fire protection water service to the proposed project. The project site would also remain in the service area of the LCSD rather than with the City's wastewater service area and the LCSD has reviewed the project and provided a letter to the applicant stating that the LCSD has adequate sewer capacity for the project. SBLAFCO's request is to consider an alternative that would be different than the project as proposed by requiring the extension of the City's water and wastewater service lines to the project site so that full City services could be provided.</p> <p>The City has completed an assessment of this alternative by considering what would be required for the extension of City-owned and operated water and wastewater service lines. Based upon the analysis conducted by the City, the nearest City-owned sewer line is approximately 1.5 miles to the north and the nearest water line is located 0.3 miles to the west. Dissimilar to the Golden State Water and LCSD, the City-operated utility pipelines are not adjacent to the project site. It is not known whether connection to the nearest lines would be feasible. If these connections were feasible, connection to these pipelines would require the construction of conveyance pipelines to the existing pipelines and the possible enlargement of the pipelines that would then need to be connected to. As well, additional infrastructure and/or improvements may be required (e.g., pumping stations, treatment, etc.). Further engineering analysis would need to be conducted to determine the exact location of new pipeline extensions and system upgrades.</p> <p>It is also important to note that Golden State Water currently serves portions of land within the Santa Maria city limits (see Figure 4.14-1) as does LCSD (see Figure 4.14-2). The project as proposed would not be establishing a new precedent by allowing properties within the city limits to be serviced by utility providers not affiliated by the City.</p>

Comment No.	Response
	<p>The State CEQA Guidelines provide direction for the discussion of alternatives to the project within an EIR. Specifically, an EIR shall describe a range of reasonable alternatives that would avoid or substantially lessen any of the significant effects of the project (Section 15126.6(a)). Further, the discussion of alternatives is to focus on alternatives to the project which can avoid or substantially lessening any significant effects of the project (Section 15126.6(b)).</p> <p>All of the improvements that would be necessary for the project site to connect to City water and wastewater systems would require ground disturbance which would have the potential to create additional environmental impacts beyond what would be required should the project connect to the existing adjacent Golden State Water and LCSD infrastructure, including but not limited to the potential to uncover cultural resources and new construction activities that would increase air quality and noise effects. While it is not possible to determine the extent of these effects without further analysis, the mere potential for these impacts to occur means that this alternative would not reduce environmental impacts of the proposed project. Therefore, this alternative scenario would not meet CEQA requirements for an alternative that should be evaluated. Further, LCSD and Golden State Water have indicated that they are willing and able to serve the project site and the proposed development and are supportive of providing services to the project site. Specifically, LCSD has adequate wastewater collection, treatment, and discharge capabilities to serve the project and Golden State Water has indicated that they will be able to provide domestic and fire protection water service to the project site and project.</p> <p>For these reasons, the City is not obligated to further consider this alternative within the EIR.</p>
LAFCO 2-16	<p>The comment requests that the City outline any specific deed restrictions applicable to the annexation site. Deed restrictions are not relevant to the environmental analysis. Further, the City is not aware of deed restrictions on the site, but this is not meant to imply they do not exist. If SBLAFCO would like the Applicant to provide deed restriction information, this request can be made of the Applicant directly. In this context, it should be noted that the project would only move forward to formal SBLAFCO Commission consideration if the Santa Maria City Council adopts a Resolution to Initiate Annexation to the City. The City Council has not yet made this determination.</p>
LAFCO 2-17	<p>The comment indicates that the SBLAFCO Commission has requested the City provide analysis related to impacts to the OCP the Program EIR for the OCP.</p> <p>It is correct that the EIR does not contain an analysis of consistency with the OCP nor the OCP EIR. It is appropriate for the City to exclude consideration of the OCP given the City would be the regulatory authority over the project site should the annexation move forward. If annexation were to occur, neither the County's OCP nor the OCP EIR would apply and the City would then have local jurisdictional authority, not the County. The analysis requested by the SBLAFCO is not necessary.</p> <p>Nonetheless, to provide the information requested by the County of Santa Barbara, the City has conducted a preliminary analysis of the project's consistency with goals, policies, actions, and development standards in the County Comprehensive Plan and the OCP that are applicable to the various components of the project and the location of Key Site 26, as defined in the OCP. This policy analysis is provided in EIR Volume 2, Appendix D.</p> <p>The analysis in EIR Volume 2, Appendix D does not affect the CEQA analysis for the annexation, given the City would be the regulatory authority over the project site should the annexation be approved by the City and the SBLAFCO. Although policy consistency determinations would not result in direct impacts to the physical environment beyond the potential impacts identified and addressed in the EIR, the policy consistency discussion is provided for informational purposes. Further, it is not the City's responsibility to determine consistency with County policies. For that reason, this analysis is only provided as a preliminary or potential consistency analysis. The City offers great deference to the County in determining consistency with their own policies. In other words, different determinations by the County may be made if a project like Richards Ranch were to be proposed in the County's jurisdiction without the annexation proposal. The County has unique competence to interpret their own policies when applying them. It is also recognized that the County policies reflect a range of competing interests; the County should solely be allowed to weigh and balance their discretion to construe its policies when applying them.</p> <p>In the context of this comment, it is important to note that the OCP EIR was certified in 1997 and the OCP was first approved at that time, more than 25 years ago.</p>
LAFCO 2-18	<p>The comment indicates that the SBLAFCO Commission has requested that the City provide an analysis related to school enrollment impacts resulting from the project.</p> <p>The EIR consultant, on behalf of the City, reached out to both OUSD and SMJUHSD to determine if additional information was available to predict the need and location of future additional facilities. No additional information was provided. As such, it would be speculative to identify school enrollment effects and/or the location of future facilities that would serve the students from the Richards Ranch. The SMJUHSD indicated that SMJUHSD must accommodate the students generated by the project and would do so at Ernest Righetti High and that additional classrooms and support services would be needed at the school site to accommodate the project's student generation. However, SMJUHSD indicated that, due to the unknown timeline for project approval and fluctuations in students and timeline, identifying the exact needs would be</p>

Comment No.	Response
	<p>speculative (SMJUHSD 2023). OUSD did not provide any supplemental information after several attempts by the EIR consultant to contact them for supplemental information.</p> <p>As recently upheld in <i>Santa Rita Union School District v. City of Salinas</i> (2023) Cal.App.5<sup>th</sup> Court of Appeal, where information from school districts is uncertain and/or vague, it is not necessary to further analyze the potential indirect impacts of future school facility development. These effects cannot be further analyzed or responded to per State Guidelines Section 15145. The school districts have not provided any substantial evidence or information regarding future school sites or any reasonably foreseeable indirect environmental impacts of providing school facilities on existing or future school sites.</p> <p>Therefore, in conjunction with other plans and funding sources used by the school districts, the payment of the state-mandated impact mitigation fees would ensure that the effects of the project on the provision of school services would be less than significant. Based on the information provided in the Draft EIR and this supplemental information, potential environmental impacts associated with the provision of public schools have been adequately evaluated in the EIR.</p> <p>See also Master Response 2, Public Services – School Facilities. No further refinements to the analysis contained in the EIR are necessary.</p>
LAFCO 2-19	<p>The comment indicates that the SBLAFCO Commission would like a better understanding of the City's intentions as they related to the SOI covering the Orcutt community. Specifically, SBLAFCO asks whether the City has considered and/or adopted any policies for the existing SOI boundary (e.g., any goals, policies, objectives, or implementation programs covering the Orcutt area specifically).</p> <p>The City does not have any adopted goals, policies, or similar for the lands outside of the city limits but within the SOI boundary. However, the City is currently undergoing a General Plan Update and is addressing "Planned Annexation" in the Preferred Land Use Alternative (City of Santa Maria 2023). This Preferred Land Use Alternative includes annexing approximately 900 acres east of Highway 101 as part of the General Plan Update. However, the Preferred Land Use Alternative does not include annexation of the Orcutt area. The Preferred Land Use Alternative has not yet been adopted by the City but has been identified in a recent memorandum and community presentations.</p>



*This page intentionally left blank.*

## 1.2.6 Santa Barbara County Air Pollution Control District



February 24, 2023

Dana Eady  
City of Santa Maria  
Community Development Department  
110 South Pine Street, Room 101  
Santa Maria, CA 93458

Email only: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

**Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the Richards Ranch Annexation Project (AN2021-0001)**

Dear Dana Eady:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (EIR) for the Richards Ranch Annexation Project. The project involves the pre-zoning of four parcels located in Santa Barbara County by the City of Santa Maria and annexation of the property into the Santa Maria city limits. Three parcels of 2.33, 1.86, and 12.16 acres will be pre-zoned General Commercial (PD/C-2) and one parcel of 27.40 acres will be pre-zoned High Density Residential (PD/R-3). A conceptual layout for future development of the project site includes buildout for commercial uses, 400 apartments, and 95 townhomes. The commercial uses of the concept plan currently entail 65,000 square feet (SF) for a retail center including a corner gas station, 25,000 SF of mini storage, a 6,800 SF pad with a drive-through restaurant, and a 10,000 SF pad with two drive-through restaurants. The four parcels (APNs 107-250-019, -020, -021, and -022) are located to the northeast and southeast of the intersection of SR-135 and Union Valley Parkway in the unincorporated community of Orcutt.

APCD-1

District staff have the following comments on the Draft EIR and proposed project:

1. **Significant Air Quality Impacts for Mobile Emissions and Greenhouse Gases:** The Draft EIR concludes that the proposed project's emissions do not exceed adopted thresholds of significance for air quality or greenhouse gases (GHGs). However, the Air Quality and Greenhouse Gas Impact Assessment (Appendix E) does not adequately analyze the project's impacts for mobile trips. The analysis inappropriately reduces the project's trip rate by 30%, a reduction of approximately 6,233 daily trips, by excluding internal trips. Internal trips, trips that originate and end within the project site, emit air pollution and should not be subtracted from the project's trip rate. Also, it is the District's understanding that the Updated Traffic and Circulation Study (Appendix C) will be amended. Please ensure that the trip rate used to assess air quality and GHG impacts is based on the latest traffic study and includes internal trips.

APCD-2

APCD-3

Currently, project emissions are very close to exceeding several thresholds of significance. The revisions identified above, including the accounting of internal trips, may result in the project's exceedance of significance thresholds for motor vehicles (25 lbs/day for ROC or NOx) and GHGs. Potentially significant impacts should be mitigated appropriate under CEQA. Any mitigation proposed to reduce NOx, ROC, or GHG emissions should be quantified and included in the final environmental document. The final environmental document should include a Mitigation

APCD-4

Aeron Arlin Genet, Air Pollution Control Officer

805.961.8800 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 [ourair.org](http://ourair.org) @OurAirSBC

District Comments on the Draft EIR for Richard's Ranch Annexation Project  
February 24, 2023  
Page 2 of 3

Monitoring and Reporting Plan that explicitly states the required mitigations and establishes a mechanism for enforcement.

The California Air Pollution Control Officers Association's (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*<sup>1</sup> (Handbook) provides descriptions and quantification methodologies for mitigation measures. Many of the transportation-related mitigation measures in the Handbook also reduce mobile emissions of ROC and NOx. Sacramento AQMD's *Table of Prerequisites and Measures* in their guidance document *Recommended Guidance for Land Use Emissions Reductions*,<sup>2</sup> lists mitigation measures from the Handbook which reduce criteria pollutants from mobile trips. Additionally, the District has identified some potential strategies for local GHG mitigation through a public input process that could be implemented in Santa Barbara County. The strategies researched by the District and the input received from the public has been summarized and posted on the District's website.<sup>3</sup>

APCD-4  
(cont'd)

2. **Subsequent CEQA Review for Gas Station:** The Draft EIR does not adequately analyze the impacts of a gas station. As part of District permit issuance, gas station projects are required to prepare a Health Risk Assessment (HRA) to determine the potential level of risk associated with the emission of toxic air contaminants (TACs) from its operations. Whenever an HRA is required, we recommend including the results in the CEQA document to ensure that the project will not result in a significant impact. As the Draft EIR does not include an evaluation of potential health risk impacts or quantify operational emissions from fugitive reactive organic compounds (ROCs), the City should evaluate whether subsequent project-specific CEQA review is required for a gas station when processing land use permits for future individual development proposals.

APCD-5

3. **Discrepancy in Project Size:** Table S-1 Summary of Proposed Conceptual Development Plan Buildout on page S-2 of the Draft EIR, the project description on page 2-8, and Table 2-6 Conceptual Future Project Buildout Schedule on page 2-13 list the maximum potential commercial buildout of the project as 106,800 square feet. This conflicts with the project summary on pages S-2 and 2-8 which lists the maximum potential commercial buildout of 160,800 square feet. Please fix the discrepancy. In addition, the Air Quality and Greenhouse Gas Impact Assessment (Appendix E) is based on a commercial buildout of approximately 130,000 square feet. The Air Quality and Greenhouse Gas Impact Assessment should be updated as appropriate to reflect the correct square footage of full commercial buildout.

APCD-6

4. **Low VOC Paint:** The analysis has assumed the project will only use low VOC (Volatile Organic Compounds) paint with a VOC content not to exceed 50 grams per liter. As this VOC content is stricter than what is required by District rules, the City should set a condition of approval that the VOC content of 50 grams per liter is not exceeded for all architectural coatings (including interior paint, exterior paint, and parking lot striping) used throughout the life of the project.

APCD-7

<sup>1</sup>Available at [www.caleemod.com/handbook/index.html](http://www.caleemod.com/handbook/index.html)

<sup>2</sup>Available at [www.airquality.org/LandUseTransportation/Documents/LandUseEmissionReductions4.3Final.pdf](http://www.airquality.org/LandUseTransportation/Documents/LandUseEmissionReductions4.3Final.pdf)

<sup>3</sup>Available at [www.ourair.org/ghgmitigation-sbc](http://www.ourair.org/ghgmitigation-sbc)

District Comments on the Draft EIR for Richard's Ranch Annexation Project  
February 24, 2023  
Page 3 of 3

5. **Construction Engine Emission Standards:** The analysis has assumed that all diesel offroad construction equipment will be equipped with Tier 4 Final engines. The City should ensure that the use of Tier 4 Final engine emissions standards for all construction equipment is made a condition of approval for the project.
6. **Construction Significance Thresholds:** The discussion in the Draft EIR on page 4.2-27 and *Table 4.2-5 Annual Construction Emissions without Mitigation* cites the 25 ton/yr threshold applied to construction emissions as "*SBCAPCD Significance Thresholds*". The District does not have adopted CEQA thresholds for short-term/construction emissions. The District does have a threshold at which a permitted stationary source would have to provide offsets for construction emissions under District Rule 202.D.16 that is often used as a guideline by lead agencies for determining the significance of construction emissions. If the 25 ton/yr threshold is utilized by a lead agency on a project-specific basis, the lead agency should cite the threshold as the lead agencies, not the District's. A discussion of the basis of the threshold should be provided. Please revise the table and discussion as necessary.
7. **Greenhouse Gas Significance Threshold:** The summary of the project's impacts and mitigation measures on page S-6 for GHG Impact 1 states that "*the project would not generate greenhouse gas emissions above established SBCAPCD thresholds.*" Please revise this statement to reflect that the EIR relies on a local efficiency threshold for determination of the significance of greenhouse gas emission impacts, not an SBCAPCD threshold.
8. **Toxic Air Contaminants (TACs):** The TACs section on page 4.2-31 of the Draft EIR should include a general discussion of the impacts and potential risks to sensitive receptors associated with TACs emitted from a gas station and other uses than may emit TACs.
9. **Odors:** Certain projects have the potential to cause odor impacts because of the nature of the operation and their location. The discussion of the project's odor impacts on page 4.2-32 of the Draft EIR should include a discussion of potential odor issues from the operation of a gas station, fast-food restaurants, and other uses that could result in nuisance odors.

APCD-8

APCD-9

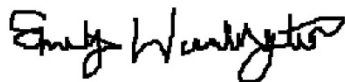
APCD-10

APCD-11

APCD-12


We hope you find our comments useful. Please contact me at (805) 979-8334 or by e-mail at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org) if you have questions.

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Planning Chron File



February 24, 2023

Dana Eady  
City of Santa Maria  
Community Development Department  
110 South Pine Street, Room 101  
Santa Maria, CA 93458

Email only: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

**Re: Santa Barbara County Air Pollution Control District Suggested Conditions on the Richards Ranch Annexation Project (AN2021-0001)**

Dear Dana Eady:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project which involves the pre-zoning of four parcels located in Santa Barbara County by the City of Santa Maria and annexation of the property into the Santa Maria city limits. Three parcels of 2.33, 1.86, and 12.16 acres will be pre-zoned General Commercial (PD/C-2) and one parcel of 27.40 acres will be pre-zoned High Density Residential (PD/R-3). A conceptual layout for future development of the project site includes buildout for commercial uses, 400 apartments, and 95 townhomes. The commercial uses of the concept plan currently entail 65,000 square feet (SF) for a retail center including a corner gas station, 25,000 SF of mini storage, a 6,800 SF pad with a drive-through restaurant, and a 10,000 SF pad with two drive-through restaurants. The four parcels (APNs 107-250-019, -020, -021, and -022) are located to the northeast and southeast of the intersection of SR-135 and Union Valley Parkway in the unincorporated community of Orcutt.

Based on the project description and information that has been provided, the proposed project may include equipment or operations subject to District permit requirements and prohibitory rules. Therefore, the District may be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the CEQA determination when evaluating any District permits for proposed equipment. As land use permits are processed for future individual development proposals, the CEQA document should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to District permit issuance. In addition, if an evaluation of health risk is required for District permitting, such as for a gas station, we recommend including the health risk assessment (HRA) results in the CEQA document to ensure that project-related equipment will not result in a significant impact.

The proposed project is subject to the following regulatory requirements that should be included as conditions of approval in the applicable land use permit:

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | [ourair.org](http://ourair.org) | [@OurAirSBC](https://www.facebook.com/OurAirSBC)

APCD-13

District Suggested Conditions on Richards Ranch Annexation Project  
February 24, 2023  
Page 2

1. Prior to building permit issuance, **District Authority to Construct permits** must be obtained for all equipment that requires a District permit. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. District Authority to Construct permits are required for diesel engines rated at 50 brake horsepower and greater (e.g., firewater pumps and emergency standby generators) and boilers/large water heaters whose combined heat input rating exceeds 2.0 million British thermal units per hour (Btu/hr). *Advisories:* (1) In the case of a diesel-fired emergency generator, an equipment-specific Health Risk Assessment may be required as part of District permit issuance. The applicant should refer to the District's website at [www.ourair.org/dice-atcm](http://www.ourair.org/dice-atcm) for more information on diesel engine permitting. (2) The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see [www.ourair.org/permit-applications](http://www.ourair.org/permit-applications) to download the necessary permit application(s).
2. All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits prior to grading/building permit issuance. Construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months.
3. The application of architectural coatings, such as paints, primers, and sealers that are applied to buildings or stationary structures, shall comply with District Rule 323.1, *Architectural Coatings* that places limits on the VOC-content of coating products.
4. Asphalt paving activities shall comply with District Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.
5. Construction activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see [www.ourair.org/wp-content/uploads/rule345.pdf](http://www.ourair.org/wp-content/uploads/rule345.pdf). Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).
6. Natural gas-fired fan-type central furnaces with a rated heat input capacity of less than 175,000 British thermal units per hour (Btu/hr) and water heaters rated below 75,000 Btu/hr must comply with the emission limits and certification requirements of District Rule 352. Please see [www.ourair.org/wp-content/uploads/rule352.pdf](http://www.ourair.org/wp-content/uploads/rule352.pdf) for more information.
7. Boilers, water heaters, and process heaters rated between 75,000 and 2.0 million British thermal units per hour (Btu/hr) must comply with the emission limits and certification requirements of District Rule 360. Note: Units fired on fuel(s) other than natural gas still need to be certified under Rule 360. Please see [www.ourair.org/wp-content/uploads/rule360.pdf](http://www.ourair.org/wp-content/uploads/rule360.pdf) for more information.
8. Boilers, water heaters, and process heaters rated between 2 million to 5 million British thermal units per hour (Btu/hr) must comply with the emission limits and certification requirements of District Rule 361. Please see [www.ourair.org/wp-content/uploads/Rule361.pdf](http://www.ourair.org/wp-content/uploads/Rule361.pdf) for more information.

APCD-13  
(cont'd)

District Suggested Conditions on Richards Ranch Annexation Project  
February 24, 2023  
Page 3

9. At all times, idling of heavy-duty diesel trucks should be minimized; auxiliary power units should be used whenever possible. State law requires that:
- Drivers of diesel-fueled commercial vehicles shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location.
  - Drivers of diesel-fueled commercial vehicles shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle. Trucks with 2007 or newer model year engines must meet additional requirements (verified clean APS label required).
  - See [www.arb.ca.gov/noidle](http://www.arb.ca.gov/noidle) for more information.

In addition, the District recommends that the following **best practices** be considered for inclusion as conditions of approval, in the interest of reducing emissions of criteria air pollutants, toxic air contaminants, greenhouse gases, and dust:

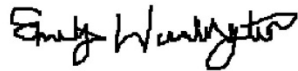
1. To reduce the potential for violations of District Rule 345 (*Control of Fugitive Dust from Construction and Demolition Activities*), Rule 302 (*Visible Emissions*), and Rule 303 (*Nuisance*), standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the District prior to grading/building permit issuance.
2. The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible. Prior to grading/building permit issuance and/or map recordation, all requirements shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout all grading and construction periods. The contractor shall retain the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles onsite and have it available for inspection.
3. At a minimum, prior to occupancy, any feasible greenhouse gas reduction measures from the following sector-based list should be applied to the project:
  - Energy use (energy efficiency, low carbon fuels, renewable energy)
  - Water conservation (improved practices and equipment, landscaping)
  - Waste reduction (material re-use/recycling, composting, waste diversion/minimization)
  - Architectural features (green building practices, cool roofs)
  - Transportation (reduce vehicle miles traveled through employee commute trip reduction programs, such as ride-sharing programs and alternative transportation options, such as public transit, local shuttles, park-and-ride lots, etc., pedestrian- and bicycle-friendly features such as sidewalks and bike racks)
  - Electric Vehicle Infrastructure (EV charger installation, installation of pre-wiring for future EV chargers)
  - For additional information on greenhouse gas mitigation and potential strategies, see [www.ourair.org/ghgmitigation-sbc](http://www.ourair.org/ghgmitigation-sbc).

APCD-13  
(cont'd)

*District Suggested Conditions on Richards Ranch Annexation Project*  
*February 24, 2023*  
*Page 4*

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8334 or via email at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org).

Sincerely,



Emily Waddington,  
Air Quality Specialist  
Planning Division

Attachments: Fugitive Dust Control Measures  
Diesel Particulate and NO<sub>x</sub> Emission Measures

cc: Planning Chron File

APCD-13  
(cont'd)





air pollution control district  
SANTA BARBARA COUNTY

ATTACHMENT A  
FUGITIVE DUST CONTROL MEASURES

These measures should be required for all projects involving earthmoving activities regardless of the project size or duration. Projects are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345).

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to grading/building permit issuance and/or map clearance.

**PLAN REQUIREMENTS:** All requirements shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map. **Timing:** Requirements shall be shown on plans prior to grading/building permit issuance and/or recorded with the map during map recordation. Conditions shall be adhered to throughout all grading and construction periods.

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

APCD-13  
(cont'd)



air pollution control district  
SANTA BARBARA COUNTY

**ATTACHMENT B**  
**DIESEL PARTICULATE AND NO<sub>x</sub> EMISSION REDUCTION MEASURES**

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of diesel-powered mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation (Title 13, California Code of Regulations (CCR), §2449), the purpose of which is to reduce oxides of nitrogen (NO<sub>x</sub>), diesel particulate matter (DPM), and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. Off-road heavy-duty trucks shall comply with the State Off-Road Regulation. For more information, see [www.arb.ca.gov/msprog/ordiesel/ordiesel.htm](http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm).
- Fleet owners of diesel-fueled heavy-duty trucks and buses are subject to CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation (Title 13, CCR, §2025), the purpose of which is to reduce DPM, NO<sub>x</sub> and other criteria pollutants from in-use (on-road) diesel-fueled vehicles. For more information, see [www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm](http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm).
- All commercial off-road and on-road diesel vehicles are subject, respectively, to Title 13, CCR, §2449(d)(3) and §2485, limiting engine idling time. Off-road vehicles subject to the State Off-Road Regulation are limited to idling no more than five minutes. Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes, unless the truck engine meets the optional low-NO<sub>x</sub> idling emission standard, the truck is labeled with a clean-idle sticker, and it is not operating within 100 feet of a restricted area.

The following measures are recommended:

- Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.
- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.
- Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, should be used on-site where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.
- Construction truck trips should be scheduled during non-peak hours to reduce peak hour emissions whenever feasible.
- Proposed truck routes should minimize to the extent feasible impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows.

**PLAN REQUIREMENTS AND TIMING:** Prior to grading/building permit issuance and/or map recordation, all requirements shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout all grading and construction periods. The contractor shall retain the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles onsite and have it available for inspection.

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

**APCD-13**  
**(cont'd)**

### 1.2.6.1 Response to Letter from Santa Barbara County Air Pollution Control District

Comment No.	Response																																													
APCD-1	<p>The comment introduces the letter from the Santa Barbara County Air Pollution Control District (SBCAPCD) and provides a summary of the project.</p> <p>Because this introductory comment does not contain comments on the EIR, no response is necessary.</p> <p>It is noted that the City has considered the overall SBCAPCD comment letter. Most comments in the SBCAPCD comment letter, including this one, do not affect the findings of the Air Quality and Greenhouse Gas (GHG) Impact Assessment (EIR Volume 1, Appendix E) and did not result in the need to revise the assessment or the EIR analysis (AMBIENT 2022a). However, to support the Final EIR process, additional supplemental analyses have been provided to ensure that SBCAPCD's comments have been addressed for the record and to facilitate project consideration by the various agencies involved in deliberation of the project and the project decision-making process. The specific results of these analyses are described in the following responses.</p>																																													
	<p>The comment indicates that the SBCAPCD believes that the Air Quality and GHG Impact Assessment (EIR Volume 1, Appendix E) and, thus, the EIR does not adequately analyze the project's impacts for mobile trips. Specifically, the commenter asserts that the analysis inappropriately reduces the project's trip rate by 30%, a reduction of approximately 6,233 daily trips, by excluding internal trips.</p> <p>Based on the traffic analysis prepared for the EIR (EIR Volume 1, Appendix E), internal trips would be 30% of the average daily trips (ADT) or approximately 6,234 daily trips. Based on previous conversations with SBCAPCD staff, the SBCAPCD recommended modeling these trips with a trip distance of 0.1 miles to fully quantify the emissions of the project. Using the suggested trip distance of 0.1 miles per trip and assuming that all trips would be by motor vehicle, internal trips would account for 623.43 VMT per day or an estimated total of 226,928.52 VMT per year.</p> <p>The emissions presented in the EIR's Air Quality and GHG Impact Assessment (EIR Volume 1, Appendix E) were conservatively based on the "unmitigated" values identified in the CalEEMod output for mobile sources. The analysis did not reflect emission reductions associated with the project's proximity to local transit or improved pedestrian network, which is part of the project design. The inclusion of these features would reduce the projects annual VMT by 3,157,141 annually, which would more than offset internal trips. Reductions in project VMT associated with the project's proximity to local transit and improved pedestrian network are summarized in Table APCD-1.</p> <p>An analysis has been prepared using a more conservative internal trip assumption of 19%. This analysis provides VMT estimates that are more conservative trip generation estimates, internal trips, and updated factors for the pass-by trips from the Institute of Transportation Engineers (ITE) Trip Generation Manual. The results of supplemental analysis calculations are compared to the EIR calculations as shown in Table APCD-1.</p>																																													
APCD-2	<p><b>Table APCD-1. Internal VMT Calculations</b></p> <table><tr><th>Scenario</th><th>Residential</th><th>Commercial</th><th>Internal</th><th>Total</th></tr><tr><td colspan="5"><b>October 2022 Traffic and Circulation Study Calculations (30% Internal &amp; Default Pass-By Factors)</b></td></tr><tr><td>VMT without Transit and Pedestrian Adjustments</td><td>4,236,315</td><td>10,447,366</td><td>0</td><td>14,683,681</td></tr><tr><td>VMT with Transit and Pedestrian Adjustments</td><td>3,325,464</td><td>8,201,076</td><td>0</td><td>11,526,540</td></tr><tr><td>Reduction with Transit and Pedestrian Adjustments</td><td></td><td></td><td></td><td>3,157,141</td></tr><tr><td colspan="5"><b>Project Calculations in Support of Response to Comments (19% Internal &amp; Current ITE Pass-By Factors)</b></td></tr><tr><td>VMT without Transit and Pedestrian Adjustments</td><td>4,604,874</td><td>10,487,524</td><td>146,475</td><td>15,238,873</td></tr><tr><td>VMT with Transit and Pedestrian Adjustments</td><td>3,614,826</td><td>8,232,707</td><td>146,475</td><td>11,994,008</td></tr><tr><td>Reduction with Transit and Pedestrian Adjustments</td><td></td><td></td><td></td><td>3,244,865</td></tr></table>	Scenario	Residential	Commercial	Internal	Total	<b>October 2022 Traffic and Circulation Study Calculations (30% Internal &amp; Default Pass-By Factors)</b>					VMT without Transit and Pedestrian Adjustments	4,236,315	10,447,366	0	14,683,681	VMT with Transit and Pedestrian Adjustments	3,325,464	8,201,076	0	11,526,540	Reduction with Transit and Pedestrian Adjustments				3,157,141	<b>Project Calculations in Support of Response to Comments (19% Internal &amp; Current ITE Pass-By Factors)</b>					VMT without Transit and Pedestrian Adjustments	4,604,874	10,487,524	146,475	15,238,873	VMT with Transit and Pedestrian Adjustments	3,614,826	8,232,707	146,475	11,994,008	Reduction with Transit and Pedestrian Adjustments				3,244,865
Scenario	Residential	Commercial	Internal	Total																																										
<b>October 2022 Traffic and Circulation Study Calculations (30% Internal &amp; Default Pass-By Factors)</b>																																														
VMT without Transit and Pedestrian Adjustments	4,236,315	10,447,366	0	14,683,681																																										
VMT with Transit and Pedestrian Adjustments	3,325,464	8,201,076	0	11,526,540																																										
Reduction with Transit and Pedestrian Adjustments				3,157,141																																										
<b>Project Calculations in Support of Response to Comments (19% Internal &amp; Current ITE Pass-By Factors)</b>																																														
VMT without Transit and Pedestrian Adjustments	4,604,874	10,487,524	146,475	15,238,873																																										
VMT with Transit and Pedestrian Adjustments	3,614,826	8,232,707	146,475	11,994,008																																										
Reduction with Transit and Pedestrian Adjustments				3,244,865																																										
	Source: ATE (2023; EIR Volume 2, Appendix A)																																													

Comment No.	Response
	<p>The emissions presented in the EIR and the Air Quality and GHG Impact Assessment (EIR Volume 1, Appendix E) are conservatively based on the "unmitigated" values identified in the CalEEMod output for mobile sources. The analysis did not reflect emission reductions associated with the project's proximity to local transit or improved pedestrian network, which are a part of the project design.</p> <p>As described in EIR Chapter 2, Project Description, the frontage of Orcutt Road along the commercial sites would be widened and sidewalks and bike lanes would be provided. Additionally, pedestrian connections would be provided between the sidewalks on UVP and the proposed retail uses/buildings as well as between the sidewalks on UVP and the proposed residential buildings. The project as depicted in the conceptual site plan would incorporate the inclusion of two city public transit bus stops as part of its design strategy to improve accessibility to public transportation. These bus stops are strategically positioned to encourage greater usage of public transit, aiming to reduce the reliance on individual vehicles and consequently lower the overall VMT associated with the project.</p> <p>The inclusion of these features would reduce the projects annual VMT by 3,157,141 annually, which would more than offset internal trips. Reductions in project VMT associated with the project's proximity to local transit and improved pedestrian network are summarized in Table APCD-1. The VMT reductions for both the October 2022 Traffic and Circulation Study VMT calculations and the more recent calculations completed in support of the response to comments for the project are also presented in Table APCD-1.</p> <p>Additionally, the inclusion of internal trip emissions of criteria air pollutants and reductions associated with the project's proximity to transit and inclusion of pedestrian network have been quantified and are depicted in Table APCD-2 (this table corresponds with EIR Table 4.2-6 in Section 4.2, Air Quality).</p>

**Table APCD-2. Supplemental Daily Operational Air Pollutant Emissions**

	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	FUG PM <sub>10</sub>	EXH PM <sub>10</sub>	TOT PM <sub>10</sub>	FUG PM <sub>2.5</sub>	EXH PM <sub>2.5</sub>	TOT PM <sub>2.5</sub>
Category	lbs/day									
Area <sup>1,2</sup>	16.73	0.47	40.83	0.00	0.00	0.23	0.23	0.00	0.23	0.23
Energy <sup>2</sup>	0.36	3.17	2.08	0.02	0.00	0.25	0.25	0.00	0.25	0.25
Mobile External Trips <sup>3</sup>	23.88	20.55	153.08	0.22	24.35	0.19	24.54	6.50	0.18	6.68
Mobile Internal Trips <sup>4</sup>	0.10	0.22	1.53	0.00	0.48	0.00	0.48	0.13	0.00	0.13
<b>Total</b>	<b>41.07</b>	<b>24.41</b>	<b>197.52</b>	<b>0.24</b>	<b>24.83</b>	<b>0.67</b>	<b>25.50</b>	<b>6.63</b>	<b>0.65</b>	<b>7.28</b>
SBCAPCD Significance Thresholds (All Sources)	240	240	-	-	-	-	80	-	-	-
Exceeds Significance Thresholds?	No	No	-	-	-	-	No	-	-	-
<b>Mobile Total</b>	<b>23.98</b>	<b>20.77</b>	<b>154.61</b>	<b>0.22</b>	<b>24.83</b>	<b>0.19</b>	<b>25.02</b>	<b>6.63</b>	<b>0.18</b>	<b>6.81</b>
SBCAPCD Significance Thresholds (Mobile Sources)	25	25	-	-	-	-	-	-	-	-
Exceeds Significance Thresholds?	No	No	-	-	-	-	-	-	-	-

Source: AMBIENT (2023; EIR Volume 2, Appendix E)

Notes: FUG = Fugitive; EXH = Exhaust; TOT = Total; N/A = Not applicable

<sup>1</sup> Includes default VOC emissions for architectural coatings.

<sup>2</sup> Based on corrected Square Footage derived from project site plan.

<sup>3</sup> Includes reduction for existing transit stop near project site and site design elements for incorporation of pedestrian access.

<sup>4</sup> Based on 623.43 miles per day traveled within the project site.

Comment No.	Response
	<p>As depicted, daily operational emissions would total approximately 41.07 pounds/day of ROG, 24.41 pounds/day of NOx, and 25.50 pounds/day of PM10. While mobile source emissions would total 23.98 pounds/day of ROG and 20.77 pounds/day of NOx. Estimated daily operational emissions from all sources of ROG, NOx, and PM10 would not exceed the SBCAPCD operational thresholds of 240 pounds/day for ROG or NOx; 25 pounds per day of ROG or NOx from mobile sources; or 80 pounds/day for PM10. As a result, this impact would remain less than significant.</p> <p>The inclusion of internal trip emissions of GHGs and reductions associated with the project's proximity to transit and inclusion of pedestrian network have also been quantified and are depicted in Table APCD-3 (this table corresponds with EIR Table 4.2-8 in Section 4.2, Air Quality).</p>

**Table APCD-3. Supplemental Operational GHG Emissions**

Emission Source	Emissions (MTCO <sub>2</sub> e/Year) Residential & Commercial	
	2027	2030
Area <sup>1</sup>	6.2	6.2
Energy <sup>1</sup>	925.6	880.1
Mobile <sup>2</sup>	3,866.3	3,639.8
Mobile Internal Trips <sup>3</sup>	66.6	61.3
Waste	158.7	158.7
Water	50.0	46.3
Total Operational Emissions:	5,073.4	4,792.4
Amortized Construction Emissions:	126.2	126.2
<b>Total with Amortized Construction Emissions:</b>	<b>5,199.6</b>	<b>4,918.6</b>
Service Population (SP) <sup>4</sup> :	1,802	1,802
MTCO <sub>2</sub> e/SP:	2.9	2.7
Locally-Appropriate GHG Efficiency Significance Threshold:	n/a	3.4
Exceeds Threshold?	n/a	<b>No</b>

Source: AMBIENT (2023; EIR Volume 2, Appendix E)

Note: GHG = Greenhouse gas; SP = Service population; MTCO<sub>2</sub>e = Metric tons of carbon dioxide equivalent

<sup>1</sup> Based on corrected Square Footage derived from project site plan.

<sup>2</sup> Includes reduction for existing transit stop near project site and site design elements for incorporation of pedestrian access.

<sup>3</sup> Based on 623.43 miles per day traveled within the project site.

<sup>4</sup> Service population was quantified based on employment and population estimates obtained from CalEEMod and ITE.

As depicted in Table APCD-3, GHG emissions would total approximately 5,199.6 MTCO<sub>2</sub>e during the opening year and 4,918.6 MTCO<sub>2</sub>e in 2030. The calculated GHG efficiency value for the proposed project, without mitigation, would be 2.9 MTCO<sub>2</sub>e/SP/yr in 2027 and 2.7 MTCO<sub>2</sub>e/SP/yr in 2030.

Further, it should be noted that the following revisions have been included on page 4.2-25 of EIR Section 4.2 to account for more accurate service population projections associated with the proposed project:

Using the U.S. Census Bureau's 2020 persons-per-household of 3.73, the project is estimated to generate 1,846 new residents (see EIR Table 4.11-6, Summary of Estimated Project-Related Population Growth,  $3.73 \times 495 = 1,846$ ). In addition to the permanent population introduced by the project, the development would also bring additional employees to the area. Proposed commercial uses include drive-through commercial spaces, a retail center, corner gas station, and mini storage. Potential for job creation would depend on the exact nature and type of commercial uses developed. However, the based on an estimate developed by the Applicant, approximately 485 new

Comment No.	Response
	<p>jobs are expected to be created. In total, these numbers bring the estimated service population to 2,331.</p> <p>As such, the GHG service population efficiency estimates have been updated accordingly. See EIR Table 4.2-8 in Section 4.2, Air Quality.</p> <p>As a result, the proposed project would not be considered to generate GHG emission, either directly or indirectly, that would have a significant impact on the environment. Implementation of the proposed project would not result in a cumulatively considerable contribution to impacts related to GHG emissions or climate change. This impact would remain less than significant.</p> <p>In summary, with the inclusions of internal site trips and additional reductions associated with the project's proximity to existing transit services and inclusion of pedestrian improvements, project-generated emissions would remain below applicable operational emissions thresholds for ROG, NOx, PM10, and GHG. However, it is important to note that the air quality and GHG analysis was conservatively based on the default pass-by trip rates identified in CalEEMod. Based on the 2022 Traffic and Circulation Study (EIR Volume 1, Appendix C) prepared for the proposed project, several of the proposed land uses within the project would have higher pass-by trip rates than the defaults contained in CalEEMod (See Table 5 of EIR Volume 1, Appendix C). These higher pass-by rates are reflected in the supplemental CalEEMod analysis completed for the project, which is provided as EIR Volume 2, Appendix E. It is also important to note that the 2022 Traffic and Circulation Study (EIR Volume 1, Appendix C) prepared for the proposed project also noted that the project would reduce countywide VMT by 43,303 VMT (See Table 22 of EIR Volume 1, Appendix C). The reduction is the result of the current lack of retail service in the area and the mixed-use nature of the project. This reduction of emissions associated with this estimated reduction in regional VMT would result in further reductions in project-generated emissions.</p> <p>As demonstrated in Tables APCD-2 and APCD-3, the emission results from the supplemental CalEEMod analysis are lower than the emission results disclosed in the EIR analysis (see EIR Tables 4.2-6 and 4.2-8 in Section 4.2, Air Quality). Therefore, the analysis presented in the EIR is conservative, and no revisions are required as a result of this comment.</p>
APCD-3	<p>The comment indicates that internal trips, trips that originate and end within the project site, emit air pollution and should not be subtracted from the project's trip rate. Also, the comment indicates that the SBCAPCD believes that the traffic and circulation study is going to be updated.</p> <p>The comments received on the traffic and circulation study prepared and circulated as part of the Draft EIR (EIR Volume 1, Appendix E) did not result in the need to revise the traffic and circulation study.</p> <p>Further, for the annexation proposed by the Applicant to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to SBLAFCO for approval as a responsible agency. If the SBLAFCO were to approve the annexation, future project buildout would require individual Planned Development Permit applications for development. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA. For these reasons, the exact project components could be adjusted in the future as the project is considered in these various approval processes.</p> <p>Additionally, refer to response to comment APCD-2 regarding how trip rates and inclusion of internal trips was addressed appropriately within the analysis.</p>
APCD-4	<p>The comment notes that project emissions are very close to exceeding several thresholds of significance and then further reiterates that if the traffic study, including consideration of internal trips, is revised, revisions to the conclusions of the analysis may be required. Additional information is also provided in the comment about the resources and references that air quality and GHG analyses should use in assessing air quality and GHG impacts.</p> <p>Refer to response to comment APCD-2 regarding the approach used to address internal trips.</p>
APCD-5	<p>The comment notes that subsequent CEQA review for the gas stations will be required to support SBCAPCD permit issuance. This additional project-specific information will be required when the development plans for the gas stations are available. Specifically, SBCAPCD states that gas station projects are required to prepare a health risk assessment to determine the potential level of risk associated with the emission of toxic air contaminants (TACs) from its operations. The comment notes that the EIR does not include an evaluation of potential health risk impacts or quantify operational emissions from fugitive reactive organic compounds (ROCs) and that the City should evaluate whether subsequent project-specific CEQA review is required for a gas station when processing land use permits for future individual development proposals.</p> <p>The proposed project as depicted in the conceptual site plan includes an approximate 10-pump gasoline-dispensing station. Exposure to gasoline-dispensing station emissions may lead to adverse health impacts for individuals nearby. Associated pollutants of primary concern are largely associated with potential releases of benzene, as well as other pollutants, such as toluene, xylenes, naphthalene, propylene, and n-Hexane. The proposed gasoline-dispensing station would be subject to the SBCAPCD permitting requirements for stationary emission sources. As part of the SBCAPCD's permit review process, a health risk assessment would be conducted to characterize potential cancer and noncancer health impacts to the</p>

Comment No.	Response
	<p>public. If associated health impacts exceed the SBCAPCD's health risk thresholds, the facility would be required to reduce potential health impacts.</p> <p>For the annexation proposed by the Applicant to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to SBLAFCO for approval as a responsible agency. If the SBLAFCO were to approve the annexation, future project buildout would require individual Planned Development Permit applications for development. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA.</p> <p>Given the first approval under consideration by the City will be the annexation, the site plan that has been prepared is only conceptual at this time to facilitate review under CEQA. Detailed project-specific information (e.g., daily/annual throughput, operational hours/days, fuel type) is not yet available that would support the preparation of a health risk assessment for the proposed facility. However, based on health risk assessments prepared for similar-sized facilities and the distance to the nearest land uses, predicted health risks would not be anticipated to exceed SBCAPCD's significance thresholds. For instance, a health risk assessment recently completed for a larger 12-pump, high volume, gasoline dispensing station identified a maximum predicted off-site cancer risk of 1.5 in a million and a non-cancer hazard index of 0.09 at distances roughly equivalent to that of the proposed project (City of Seaside 2020). Other similar gasoline-dispensing station projects have, likewise, concluded potential health risks to have a less-than-significant impact (County of Santa Barbara 2019; City of Novato 2021).</p> <p>In addition, the California Air Resources Board's Air Quality and Land Use Handbook (2005) recommends siting sensitive land uses, such as residences, at least 50 feet from typical gasoline-dispensing stations and at least 300 feet from large gasoline dispensing stations to adequately reduce potential health risks. The nearest existing or proposed residential land uses would be in excess of 300 feet from the proposed gasoline-dispensing station. Based on the proposed site plan, the nearest sensitive land uses would be located approximately 358 feet from the proposed gas station. For these reasons, the proposed gasoline dispensing station would not exceed SBCAPCD's corresponding significance thresholds of 10 in a million for cancer risk or a hazard index of 1 and would be considered to have a less-than-significant long-term impact. Compliance with current SBCAPCD permitting requirements would also help to ensure that potential health risks remain below applicable significance thresholds.</p>
APCD-6	<p>The comment notes a discrepancy in the project size characterized in the Draft EIR.</p> <p>To support processing of the proposed annexation application received by the City, the Applicant prepared a conceptual site plan, which underwent several iterations before it was finalized for EIR analysis purposes. The Air Quality and GHG Impact Assessment (EIR Volume 1, Appendix E), was prepared when a prior site plan was being considered. However, as finalized, the EIR project description considers a maximum buildout of 106,800 square feet of retail commercial uses and a 39,500-square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Because the site plan is conceptual at this time and the only application under consideration at this juncture is the annexation, the City has not required each of the technical reports to be updated to the exact square footage depicted by the conceptual site plan.</p> <p>EIR Table S-1, Summary of Proposed Conceptual Development Plan Buildout, on page S-2 of the EIR; the Project Description on page 2-8; and EIR Table 2-6, Conceptual Future Project Buildout Schedule, on page 2-13 are all correct in listing the maximum potential commercial buildout of the project as 106,800 square feet. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that did not correctly reference 106,800 square feet of commercial development were typographical errors and have been corrected in this Final EIR. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.</p> <p>The corrected commercial square footage is reflected in the supplemental CalEEMod analysis completed for the project, which is provided as EIR Volume 2, Appendix E. The inclusion of the additional commercial square footage would result in an increase of 0.1 lbs/day of ROG and 0.01 lbs/day of CO associated primarily with emissions from area sources and energy use. This same increase in square footage would result in an increase in GHG emissions of 4.9 MTCO<sub>2</sub>e/year. Inclusion of the additional square footage would not result in increased emissions of other pollutants (e.g., PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>). Furthermore, because the emissions modeling was consistent with the vehicle trip-generation rates noted in the traffic report, the additional square footage would not result in increased emissions from mobile sources. The revised model outputs have been included in Tables APCD-2 and APCD-3, provided in response APCD-2 above. As noted in Table APCD-2, estimated daily operational emissions from all sources of ROG, NO<sub>x</sub>, and PM<sub>10</sub> would not exceed the SBCAPCD operational thresholds of 240 pounds/day for ROG or NO<sub>x</sub>; 25 pounds per day of ROG or NO<sub>x</sub> from mobile sources; or 80 pounds/day for PM<sub>10</sub>. As noted in Table APCD-3, the GHG efficiency estimate of 2.7 MTCO<sub>2</sub>e/SP would not exceed the significance threshold of 3.4 MTCO<sub>2</sub>e/SP. As a result, long-term operational air quality and GHG impacts would remain less than significant.</p> <p>As demonstrated in Tables APCD-2 and APCD-3, the emission results from the supplemental CalEEMod analysis are lower than the emission results disclosed in the EIR analysis (see EIR Tables 4.2-6 and 4.2-8 in</p>

Comment No.	Response
	<p>Section 4.2, Air Quality). Therefore, the analysis presented in the EIR is conservative, and no revisions are required because of this comment.</p>
APCD-7	<p>The comment states that the analysis has assumed the project will only use low volatile organic compound (VOC) paint with a VOC content not to exceed 50 grams per liter. The SBCAPCD indicates that this VOC content is stricter than what is required by SBCAPCD rules. As such, the comment indicates that the City should set a condition of approval that the VOC content of 50 grams per liter is not exceeded for all architectural coatings (including interior paint, exterior paint, and parking lot striping) used throughout the life of the project.</p> <p>The initial CalEEMod emissions modeling for the project contained low VOC paints as mitigation for all land uses. However, the residential land uses were also run with low VOC's paints as the standard for architectural coatings. Adjusting the modeling to use paints with the default VOC emissions factors contained in CalEEMod for Santa Barbara County resulted in an increase of 0.21 lbs/day of ROG (reactive organic gases)/VOC emissions from area sources. This adjustment to the emissions modeling would not result in increased emissions of other pollutants. The revised model outputs have been included in Table APCD-2. As noted in Table APCD-2 estimated daily operational emissions from all sources of ROG, NOX, and PM10 would not exceed the SBCAPCD operational thresholds of 240 pounds/day for ROG or NOx; 25 pounds per day of ROG or NOX from mobile sources; or 80 pounds/day for PM10. As a result, this adjustment to the emissions modeling would not result in a change to the impact conclusions noted in the report. Operational air quality impacts would remain less than significant and no mitigation would be required.</p> <p>It is also important to note that when initially running the CalEEMod emissions model, various mitigation measures are typically selected not knowing how the modeled emissions will compare to the significance thresholds to avoid having to subsequently rerun the emissions model to analyze the effects of mitigation measures. Although CalEEMod emissions modeling conducted for this project included evaluation of emissions associated with the use of low-VOC content architectural coatings, uncontrolled emissions of ROG/VOC were determined to not exceed the applicable significance thresholds. As a result, although various mitigation measures may be identified in the emissions modeling output files, implementation of mitigation measures to reduce emissions below the ROG/VOC significance threshold, such as the use of low-VOC content architectural coatings, would not be required.</p>
APCD-8	<p>The comment indicates that the air quality and GHG analysis contained in the EIR has assumed that all diesel offroad construction equipment will be equipped with Tier 4 Final engines and that the City should ensure that the use of Tier 4 Final engine emissions standards for all construction equipment is made a condition of approval for the project.</p> <p>When initially running the CalEEMod emissions model, various mitigation measures are typically selected not knowing how the modeled emissions will compare to the significance thresholds to avoid having to subsequently rerun the emissions model to analyze the effects of selected mitigation measures. Although CalEEMod emissions modeling included evaluation of emissions associated with the use of Tier 4 off-road equipment, uncontrolled construction-generated emissions were determined, based on the modeling conducted, to not exceed the applicable significance thresholds. As a result, implementation of mitigation measures to reduce construction-generated emissions below the significance thresholds, including the use of Tier 4 off-road equipment, would not be required. However, the analysis recognizes that nuisance impacts could potentially occur associated primarily with the generation of fugitive dust. Mitigation measures for the control of fugitive dust have been included. Additional mitigation measures, including the use of newer off-road equipment meeting Tier 3 emissions standards, were also included. With proposed mitigation, this impact was determined to be less than significant.</p>
APCD-9	<p>The comment indicates that the discussion on page 4.2-27 in the EIR and also presented in EIR Table 4.2-5, Annual Construction Emissions without Mitigation, cites the 25 ton per year threshold applied to construction emissions as "SBCAPCD Significance Thresholds." The comment notes that SBAPCD does not have adopted CEQA thresholds for short-term/construction emissions and that, if the 25 ton per year threshold is used by a lead agency on a project-specific basis, the lead agency should cite the threshold as the lead agencies, not the District's. The comment concludes by asking that a revision occur to the EIR.</p> <p>References to the construction thresholds within text and tables have been revised within this Final EIR to address this comment.</p>
APCD-10	<p>The comment indicates that the GHG summary of the impacts and mitigation measures on page S-6 of the EIR (for GHG Impact 1) states that "the project would not generate greenhouse gas emissions above established SBCAPCD thresholds." The comment further requests that the statement be revised to reflect that the EIR relies on a local efficiency threshold for determination of the significance of GHG, not an SBCAPCD threshold.</p> <p>References to the thresholds have been corrected throughout the EIR to address this comment.</p>
APCD-11	<p>The comment states that the TACs section on page 4.2-31 of the EIR should include a general discussion of the impacts and potential risks to sensitive receptors associated with TACs emitted from a gas station and other uses than may emit TACs.</p>



Comment No.	Response
	<p>The evaluation of TACs on page 4.2-31 and 4.2-32 of the EIR has been revised to include the following additional discussion:</p> <p><u>The project includes a proposed 10-pump gasoline-dispensing station. Exposure to gasoline dispensing station emissions may lead to adverse health impacts for individuals nearby. Associated pollutants of primary concern are largely associated with potential releases of benzene, which is a known carcinogen, as well as other pollutants, such as toluene, xylenes, naphthalene, propylene, and n-Hexane. Acute exposure to such pollutants, particularly Benzene, can result in irritation of skin, eyes, and the respiratory tract, as well as central nervous system depression and abnormal heart rhythm. Longer-term exposure to benzene may cause anemia, alterations to the immune system, and cancer.</u></p> <p><u>To reduce potential health risks, the California Air Resources Board's Air Quality and Land Use Handbook (2005) recommends siting sensitive land uses, such as residences, at least 50 feet from typical gasoline-dispensing stations and at least 300 feet from large gasoline dispensing stations to adequately reduce potential health risks (CARB 2005). The nearest existing or proposed residential land uses would be more than 300 feet from the proposed gasoline-dispensing station. Based on the proposed site plan, the nearest sensitive land uses would be located approximately 358 feet from the proposed gas station. For this reason, the proposed gasoline-dispensing station would not be anticipated to exceed SBCAPCD's corresponding significance thresholds of 10 in a million for cancer risk or a hazard index of 1 and would be considered to have a less-than-significant long-term impact. It is also important to note that the proposed gasoline-dispensing station would be subject to the SBCAPCD permitting requirements for stationary emission sources. As part of the SBCAPCD's permit review process, a health risk assessment would be conducted to characterize potential cancer and noncancer health impacts to the public. If associated health impacts exceed the SBCAPCD's health risk thresholds, the facility would be required to reduce potential health impacts.</u></p>
APCD-12	<p>The comment indicates that certain projects have the potential to cause odor impacts because of the nature of the operation and their location and further requests that the discussion of the project's odor impacts on page 4.2-32 of the EIR include a discussion of potential odor issues from the operation of a gas station, fast-food restaurants, and other uses that could result in nuisance odors.</p> <p>The odor impact analysis on page 4.2-33 of the EIR has been revised, as follows:</p> <p><u>The proposed project would not result in the installation of any equipment or processes that would be considered major odor emission sources. However, the proposed project would include land uses that may result in emissions of odors that may intermittently be detectable at nearby land uses for brief periods of time (e.g., minutes). Such land uses include proposed restaurants and the gasoline-dispensing facility. These proposed land uses would generally be located away from and more than approximately 65 feet from the nearest residential land uses. Odors from such land uses are typically intermittent and disperse rapidly with increased distance from the source. As a result, odors emitted from these land uses would not be anticipated to result in a frequent exposure of a substantial number of people to odors. However, Construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly with increasing distance from the source. In addition, the project would be required to comply with SBCAPCD Rule 303 that prohibits the discharge of air contaminants or other material that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons. As a result, short-term construction activities the proposed project would not expose a substantial number of people to frequent odorous emissions. For these reasons, potential exposure of sensitive receptors to odorous emissions would be considered less than significant.</u></p>
APCD-13	<p>In addition to the comment letter on the Draft EIR, the SBAPCD provides a second letter that includes detailed information on regulatory requirements, suggested conditions of approval, and best practices that SBAPCD recommends be included as conditions of approval in the future land use permit issuance.</p> <p>The City appreciates this detailed information. Because this information does not contain comments on the EIR and is provided in consideration of future permits that may be issued by the City if the project progresses, no response is necessary. While this is not a comment specifically on the analysis contained in the EIR, this comment may be relevant for consideration in the project approval process. All comments received during the EIR public review process will be made available through their publication in this Final EIR.</p>

## 1.2.7 County of Santa Barbara



### COUNTY EXECUTIVE OFFICE

Mona Miyasato, County Executive Officer  
Terri Nisich, Assistant County Executive Officer  
Jeff Frapwell, Assistant County Executive Officer  
Nancy Anderson, Assistant County Executive Officer

March 6, 2023

Dana Eady, Planning Division Manager  
City of Santa Maria  
Community Development Department  
110 South Pine Street, Suite 101  
Santa Maria, CA 93458

Email: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

RE: Richards Ranch Annexation Draft Environmental Impact Report (DEIR)

Dear Ms. Eady:

Thank you for the opportunity to review and comment on the DEIR for the Richards Ranch Annexation Project. At this time, the County submits comments from the Fire Department, Planning and Development Department and the Public Works Department.

CoSB-1

The County departments listed above have included specific concerns and issues associated with the DEIR in each of their responses. In particular the following areas were noted:

- Planning and Development has addressed concerns related to the Project Background and Overview, Supplemental Water, Aesthetics, Historic Resources, Hazards and Hazardous Materials, Land Use and Planning, Noise, Recreation, Public Services, Traffic and Greenhouse Gases, and No Project Alternative.
- Public Works has also identified an extensive list of concerns, including additional analysis needed, with the ATE Updated Traffic and Circulation Study as described in items 1-27 of their attached letter.
- Fire has indicated the proposed annexation not to be in the best interest of the residents and property owners of the unincorporated Orcutt community. As an alternative, SBCFD recommends that any annexation proposal keep the current parcels within the Santa Barbara County Fire Protection District, for reasons set forth in their attached letter.

CoSB-2

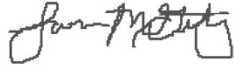
CoSB-3

CoSB-4

The County appreciates the opportunity to comment on the Richards Ranch Annexation DEIR but finds several concerns related to this project. If you should have any questions, please do not hesitate to contact my office directly, Rob Hazard, Fire Marshal for Santa Barbara County Fire, at (805) 681-5554, Lisa Plowman, Planning and Development Director at (805) 568-2086, or William Robertson, Transportation Planning Supervisor for the Transportation Division of the Public Works Department, at (805) 803-8785.

CoSB-5

Sincerely,



Jasmine McGinty  
Principal Analyst

cc: Rob Hazard, Fire Marshal for Santa Barbara County Fire  
William Robertson, Transportation Planning Supervisor, Public Works  
Department  
Lisa Plowman, Director, Planning and Development Department  
Zoë Carlson, Senior Planner, Planning and Development Department

Enclosures: Santa Barbara County Fire Department Letter, dated January 23, 2023  
Santa Barbara County Public Works Department Letter, dated February 28, 2023  
Santa Barbara County Planning and Development Department Letter, dated  
February 27, 2023

### 1.2.7.1.1 RESPONSE TO LETTER FROM COUNTY OF SANTA BARBARA

Comment No.	Response
CoSB-1	<p>The comment introduces the letters from the County of Santa Barbara and notes that the comment package includes letters from the County Fire Department (SBCFD), Planning and Development Department (SBPDD), and the Public Works Department (SBPWT).</p> <p>Because this introductory comment does not contain comments on the EIR, no response is necessary.</p>
CoSB-2	<p>The comment summarizes that SBPDD has summarized concerns regarding the Project Background and Overview, Supplemental Water, Aesthetics, Historic Resources, Hazards and Hazardous Materials, Land Use and Planning, Noise, Recreation, Public Services, Traffic and Greenhouse Gases, and No Project Alternative.</p> <p>The specific comments of and responses to the SBPDD letter are provided in Section 1.1.2.2.</p>
CoSB-3	<p>The comment summarized that the SBPWT has also identified several concerns with the ATE Updated Traffic and Circulation Study.</p> <p>The specific comments of and responses to the SBPWT letter are provided in Section 1.1.2.3.</p>
CoSB-4	<p>The comment summarizes that SBCFD indicates that the annexation is not in the best interest of the residents and property owners of the unincorporated Orcutt community. Further, the SBCFD recommends that any annexation proposal keep the current parcels within the Santa Barbara County Fire Protection District, as detailed in SBCFD's letter.</p> <p>The specific comments of and responses to the SBCFD letter are provided in Section 1.1.2.4.</p>
CoSB-5	<p>The comment provides a conclusion to the transmittal letter, noting contacts for each of the departmental representatives.</p> <p>This conclusion to the transmittal letter does not contain comments on the EIR; therefore, no response is necessary.</p>

*This page intentionally left blank.*

## 1.2.7.2 County of Santa Barbara Planning and Development Department



### County of Santa Barbara Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Elise Dale, Assistant Director

February 27, 2023

Dana Eady, Planning Division Manager  
Community Development Department  
110 South Pine Street, Room 101  
Santa Maria, CA 93458  
(805) 925-0951 ext. 2244  
[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

**RE: Richards Ranch Annexation Draft Environmental Impact Report (DEIR)**

Ms. Eady:

The County of Santa Barbara Planning and Development Department has reviewed the Draft Environmental Impact Report (DEIR) for the Richards Ranch Annexation Project (project) and appreciates the opportunity to provide the comments listed below.

**Proposed Project.** The project includes the annexation, pre-zoning, and conceptual development of approximately 44 acres of property currently located in unincorporated Santa Barbara County, California, proposed by the City of Santa Maria (City). Richards Ranch, LLC (Applicant), has prepared a conceptual development plan that anticipates potential future development and use of the site to facilitate this EIR analysis. The conceptual development plan includes a mix of commercial and high-density residential uses.

SBPDD-1

#### Santa Barbara County Planning and Development Comments

- 1. Project Background and Overview.** The project background and overview neglects to mention the approved Specific Plan on the property (83-SP-1), the Final EIR (84-EIR-8) and Supplemental EIR (86-SD-3) prepared for that Specific Plan, or the Mitigated Negative Declaration prepared for the house demolition (11NGD-00000-00005) in the Project Background (Section 2.3), the Environmental Setting (Chapter 3), or related issue area analysis sections.
- 2. Supplemental Water.** The DEIR fails to explain or provide context for the project objective that presents the proposed annexation as necessary to allow use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication. The DEIR presents the objective as follows:

SBPDD-2

SBPDD-3

February 27, 2023  
Page 2 of 10

To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to allow for the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.

Additionally, the DEIR states the following:

The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. Agreement details would need to be formalized and would occur after annexation.

Annexation is not a prerequisite to or requirement for allowing for the use of supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication. Additionally, the City's Supplemental Water Purchase Requirements document, provided in the Water Supply Assessment, Appendix K of the DEIR, does not identify annexation as a requirement for the purchase of supplemental water.

3. **Aesthetics.** The project presents a potentially significant environmental impact if it would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The DEIR did not analyze potentially significant impacts related to Aesthetic and Visual resources. The DEIR states that because the City does not identify a scenic vista in this area and because "... the project site has been previously identified and planned for urban development and is primarily surrounded by existing development [,]" implementation of the project would not have a substantial adverse effect on a scenic vista and impacts would be less than significant. As stated in the DEIR, the County has identified both SR 135 and UVP as public view corridors that provide prominent views of the area (County of Santa Barbara 2020). Additionally, the Orcutt Community Plan EIR identifies significant and unavoidable aesthetic impacts related to fragmentation of continuous open space, including on Key Site 26:

Impact VIS-8: Fragmentation of contiguous open space. Development within the northern Orcutt open space corridor on Key Sites 23-30 and the southern Airport property would lead to significant and unavoidable fragmentation of this mostly contiguous open corridor and loss of scenic resources such as open grasslands, eucalyptus windrows, and sand dunes.

A number of mitigation measures that apply to Key Site 26 were adopted in the OCP EIR related to Impact VIS-8.

Mitigation VIS-1a: Concurrently with the adoption of the Orcutt Community Plan, the County shall adopt an Open Space Overlay for the community of Orcutt to provide for the protection of contiguous bands of open space within the northern Orcutt, Orcutt Creek, Solomon Hills and West Orcutt open space corridors. The

↑  
SBPDD-3  
(cont'd)

SBPDD-4

SBPDD-5

SBPDD-6  
↓

February 27, 2023  
Page 3 of 10

purpose and intent of this overlay shall be to provide for long term protection of contiguous bands of public and private open space. This overlay system shall be designed to protect the community's most scenic natural resources and landforms, including oak, eucalyptus and riparian woodlands, hillsides, ridgelines and significant windrows. Figure 2-14 depicts the recommended location and extent of this overlay. (Addresses Impacts VIS-1, VIS-7, VIS-8, VIS-13, VIS-14, VIS-17.)

Mitigation VIS-1b: As part of adoption of the Open Space Overlay, the County shall adopt a unified open space plan for the general location and intensity of allowable uses within the open space overlay. The open space plan shall set standards for protection of significant natural resources, for provision of active and passive recreation and for the mitigation of the aesthetic impacts from development adjacent to designated open space areas. (Addresses Impacts VIS-1, VIS-7, VIS-8, VIS-13, VIS-14, VIS-17.)

Many mitigation measures were also incorporated into the OCP in the form of policies and regulations, like the development standards contained in DevStd KS26-3:

- A landscaped center median along Union Valley Parkway. The entire length of the center median shall be landscaped with drought tolerant street trees, shrubs, groundcover and decorative flatwork acceptable to County Public Works and P&D, or shall be consistent with the standard established by the landscape/median maintenance district. Trees shall be of sufficient size at maturity and spacing to provide a partial canopy over Union Valley Parkway;
- An average 35-foot wide landscaped buffer along Highway 135 with trees which reach heights exceeding 50 feet at maturity in clusters a maximum of every 100 feet (some of this buffer may be developed in an easement secured from the County, with a minimum of 20 feet of this buffer located on the project site);
- An average 35-foot wide landscaped buffer along Union Valley Parkway with trees which reach a minimum height of 35-50 feet at maturity with a sufficiently large canopy to partially extend over the roadway;
- A minimum 15-foot wide landscaped planter strip along the site's north, east, and south boundaries to soften views of new buildings and to break-up, and at a minimum, partially obscure building masses;
- Attractively landscaped pedestrian entries from adjacent roadways including attractive "stamped concrete" or other treated surface walkways linking existing sidewalks/paths with the center's own internal pedestrian circulation;
- Raised landscaped berms and/or decorative masonry walls incorporated into these buffer strips to supplement the screening provided by vegetation;
- Fast-growing vines and shrubs planted along all screening walls;

SBPDD-6  
(cont'd)

SBPDD-7



February 27, 2023  
Page 4 of 10

- Existing trees shall be preserved and incorporated in the project design, where feasible.

↑ SBPDD-7  
↑ (cont'd)

The DEIR must analyze and account for these impacts to Aesthetic and Visual resources, and/or incorporate applicable mitigation measures. Additionally, if future projects will not adhere to these requirements, there is a potentially significant impact in that the project would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. as they will not be implemented and thus the prior identified impacts would exist.

SBPDD-8

4. **Historic Resources.** Section 4.4.1.2 of the DEIR fails to mention any of the extensive historic research that was conducted on the subject property in the recent past: *Phase 1/Phase II Historical Resources Evaluation Report for 4470 Orcutt Road, Santa Barbara County, California* (prepared for Wal-Mart Stores, Inc. by Post Hazeltine Associates, October 22, 2007); *Historical Resources Evaluation Report for the Union Valley Parkway Extension Project in Santa Maria, Santa Barbara County, California* (prepared by Galvin Preservation Associates for Applied EarthWorks, Inc., December 2007); *Historic Resource Letter Report for the Buildings located at 4470 Orcutt Road, Orcutt CA* (Letter from Roy Harthorne to Troy Moore, Front Range Environmental, dated February 18, 2010); *Revised Phase 1/Phase II Historical Resources Evaluation Report for 4470 Orcutt Road, Santa Barbara County California* (prepared by Post/Hazeltine Associates for Manatt, Phelps & Phillips, May 31, 2011). The DEIR briefly mentions the demolition of a house on the subject property but does not acknowledge the Mitigated Negative Declaration (11NGD-00000-00005) or adopted mitigation measures related to this demolition.

The project studied under 11NGD-00000-00005 proposed to remove a single-family residence and other structures on the parcel. When the farmhouse was evaluated in 2007 it was considered ineligible for the NRHP and CRHP, but eligible as a County of Santa Barbara Place of Historic Merit. Due to subsequent neglect, vandalism, and the resulting structural deterioration, the house no longer retained its integrity of design, craftsmanship or materials, and could no longer convey its historic appearance or architectural type. However, demolition of the structure caused an adverse physical impact on a structure or property at least 50 years old that was evaluated in 2007 as having historical significance at the local level.

SBPDD-9

In their 2011 report, Post/Hazeltine provided management recommendations for the resource as follows:

*The farmhouse and shed at 4470 Orcutt Road are not eligible for listing as a significant historic resource at the County of Santa Barbara, State or National level. However, since the house, shed and associated farmland do have an association with notable pioneer families and the development of the Santa Maria Valley's agricultural industry, it is recommended*

February 27, 2023  
Page 5 of 10

*that the house and shed be photo-documented following the guidelines outlined by the County of Santa Barbara prior to their removal. The photographs should be compiled with photographs taken in 2006 by Cogstone Resource Management, Inc. and in 2007 by Post/Hazeltine Associates prior to the property's more extensive vandalism and copies of the historic resources report which should be archived at the Santa Maria Valley Historical Society. Also it is recommended that the history of the property and its association with the Foster and Brown families be memorialized with an onsite plaque (p. 46, section 8.4).*

Implementation of these recommendations reduced impacts to historical resources to less than significant, however, only the photo documentation has occurred to date. An impact was identified and the following mitigation measure was adopted:

Special Condition CulRes-02 Plaque. In the event that a structure is placed on this parcel in the future, the Owner/Applicant shall fund a qualified architectural historian to create a plaque commemorating the history of the property and its association with the Foster and Brown families. The plaque shall be approved by P&D and shall be placed in a prominent public location. TIMING: Photo documentation of placement of the plaque at the structure shall be provided prior to occupancy clearance.

MONITORING: P&D building inspector shall confirm plaque placement prior to final occupancy clearance.

If this mitigation measure is not implemented, the DEIR should identify the impact and incorporate appropriate mitigation.

5. **Hazards and Hazardous Materials.** The DEIR should include a discussion of the proposed General Plan amendment's compliance with compatibility criteria for density of residential development and intensity of nonresidential development established by the Draft Airport Land Use Compatibility Plan (ALUCP) for Safety Zone 2, Zone 4, and Zone 6. As stated in the DEIR, a General Plan amendment that affects allowable land uses within the Airport Influence Area requires referral to the Airport Land Use Commission (ALUC) for determination of consistency with the Airport Land Use Plan. The DEIR does not identify if the proposed General Plan amendment has obtained an ALUC determination of consistency with the Airport Land Use Plan. Accordingly, the project may present a potential impact associated with airport safety hazards. The DEIR should also address consistency with County of Santa Barbara and City of Santa Maria Goals and Objectives related to hazardous materials. Pursuant to CEQA §15126.4 (a)(1), appropriate mitigation should be included to address any significant adverse impacts.

6. **Land Use and Planning.** The project presents a potentially significant environmental impact if it would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Section 4.9 of the DEIR specifically does not

SBPDD-9  
(cont'd)

SBPDD-10

SBPDD-11

SBPDD-12

February 27, 2023  
Page 6 of 10

include consideration of policies from the County's General Plan, Orcutt Community Plan, and Land Use and Development Code even though the project is located in the unincorporated area and has an approved Specific Plan (83-SP-1) under County jurisdiction. The DEIR states the following:

*It should also be noted that because the proposed project would include annexation into the City of Santa Maria, analysis of the project's consistency with the County's Comprehensive Plan, Land Use Development Code, or Orcutt Community Plan is not included in this analysis, as those plans and policies would not apply to future development onsite if the project is approved.*

The existing analysis in Section 4.9 fails to analyze the currently applicable policy framework and is not adequate to address conflicts between the proposed project and the currently applicable policies and regulations adopted in the Orcutt Community Plan for the purpose of avoiding and mitigating environmental effects identified in the Orcutt Community Plan EIR (OCP EIR). Additionally, the Regulatory Setting (Section 3.2) neglects to include currently applicable plans and policies that apply to the project site and represent the baseline conditions.

7. **Noise.** The DEIR should include a discussion of noise from surrounding uses and facilities, including but not limited to, traffic along Highway 135/Orcutt Expressway and Union Valley Parkway as well as overflights associated with the Santa Maria Airport. Pursuant to CEQA §15126.4 (a)(1), the DEIR should include appropriate mitigation measures to address any significant adverse impacts. Mitigation measures should address impacts to the outdoor living spaces in the proposed residential area. The mitigation measures should include more details on the noise barrier walls in order to ensure that sound attenuation will be sufficient. Analyses of the Traffic Noise Levels in Appendix J should be updated to reflect any increases to traffic trips as traffic analyses for the proposed conceptual development are updated in response to comments. The DEIR should also address how analysis of the Airport Noise Contour that overlaps the northeast corner of the site was incorporated into mitigation measures ensuring that noise impacts will be less than significant.

8. **Recreation.** The DEIR fails to adequately address the loss of anticipated recreational and open spaces resources in the community. The conceptual plan proposed in Figure 2-3 of the DEIR includes commercial development, mini-storage, and private residential amenities in the northeastern portion of the site. The approved Specific Plan (83-SP-1) and the Orcutt Community Plan both identify this area as an 11.9-acre "No Build" corridor to be developed with park space and ballfields available for use by the public. This triangular portion of the site is also mapped as designated open space in the Orcutt Community Plan. The DEIR neglects to mention the loss of nearly 12 acres of planned public open space that is an integral part of the Orcutt Community plan.

SBPDD-12  
(cont'd)

SBPDD-13

SBPDD-14

ISBPDD-15

SBPDD-16

SBPDD-17

SBPDD-18

February 27, 2023  
Page 7 of 10

Additionally, the City's Environmental Procedures and Guidelines state the City utilizes Appendix G (Environmental Checklist Form), and Section 15064 of the CEQA Guidelines to determine if there is a significant impact on the environment, except that the City generally uses additional thresholds of significance in determining if impacts to traffic, noise, and air quality are considered significant. Appendix G contains the following thresholds that presents a potentially significant impact, noted as "LUP Impact 2" in the DEIR:

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The "No Build" area established in the adopted Orcutt Community Plan Open Space Area map has the stated purpose (OCP EIR, 94-EIR-01) to provide a contiguous open space network for the community, to promote recreational opportunities, to avoid hazards, and to minimize impacts to sensitive resources. As discussed above in relation OCP EIR Impact VIS-8, Mitigation VIS-1a, Mitigation VIS-1b, and Figure 2-14, the 11.9-acre "No Build" corridor was adopted for the purpose of avoiding or mitigating significant environmental effect. Removal of the open space area constitutes a potentially significant impact due to a conflict with a land use plan and multiple policies adopted for the purpose of avoiding or mitigating an environmental effect, and the DEIR fails to analyze this impact. Therefore, there is a potentially significant impact that should be evaluated in the DEIR. Currently, LUP Impact 2.

9. **Public Services.** The DEIR should include a discussion of impacts to schools and fire protection, and should acknowledge whether new public facilities will be required to serve the proposed conceptual development. Pursuant to CEQA §15126.4(a)(1), appropriate mitigation should be included to address any significant adverse impacts. The DEIR should address whether the proposed conceptual development would impact capacity at Patterson Road Elementary, Orcutt Junior High, and Ernest Righetti High School, each of which would serve the proposed conceptual development.

The DEIR states that the Santa Maria Joint Union High School District is already expected to be over capacity (145 percent) for the year 2024, without implementation of the proposed conceptual development. Additionally, the DEIR should examine the need for new public school facilities, such as school buildings, administrative infrastructure, and buses. In particular, Safe Routes to School should be available from the proposed conceptual development site to each of the aforementioned public schools. Additionally, given that fire protection response times are already "less than ideal" under current conditions, the DEIR should provide additional evidence as to why the proposed conceptual development would not require provision of new or physically expanded fire protection facilities. Simply stating that mutual aid agreements between Santa Barbara County Fire Department (SBCFD) and Santa Maria Fire Department (SMFD) and staffing a full company at Fire Station 6 will be sufficient to serve the proposed conceptual development is inadequate. Further analysis is

SBPDD-19

SBPDD-20

SBPDD-21

SBPDD-22

February 27, 2023  
Page 8 of 10

needed to confirm that there will be no environmental impacts associated with provision of fire protection facilities.

↑ SBPDD-22  
(cont'd)

**10. Traffic and Greenhouse Gases.** The DEIR transportation impact assessment is based, in part, on the Traffic and Circulation Study (ATE 2022a) prepared for the project. The Study appears to classify the project as a mixed use development project for the purpose of analyzing trip generation and traffic and circulation impacts. However, the proposed project and conceptual development plan consistent with the proposed pre-zoning designations and General Plan amendment land use designations, does not appear to qualify as mixed-use development as defined by the Institute of Transportation Engineers (ITE) and the National Cooperative Highway Research Program (NCHRP). Analysis of the proposed project as a mixed use development project may have resulted in a significant underestimation of project-generated trips and associated traffic and circulation impacts. The DEIR should address the applicability of the mixed use classification of the project in the Traffic and Circulation Study with respect to accepted ITE and NCHRP guidelines. Additionally, long-term operational greenhouse gas (GHG) emissions were analyzed using the CalEEMod, version 2020.4.0 based on the proposed land uses identified for the project, and mobile-source emissions were calculated based on the vehicle trip-generation rates derived from the Traffic and Circulation Study. Accordingly, traffic-related GHG impacts associated with the proposed project may also be significantly underestimated based on the potential underestimation of project-generated trips discussed above.

SBPDD-23

SBPDD-24

**11. No Project Alternative.** The DEIR fails to evaluate the "no project" alternative in accordance with Section 15126.6(e)(3)(A) of the State CEQA Guidelines, and fails to analyze the impacts of the "no project" alternative in accordance with Section 15126.6(e)(3)(C) of the State CEQA Guidelines. The DEIR's discussion of the No Project Alternative assumes future buildout of the project site would not occur and cites Section 15126.6(e)(3)(B) of the State CEQA Guidelines as the basis for this determination. The portion of Section 15126.6(e)(3)(B) cited by the DEIR states, "*in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained.*" However, the preceding text of Section 15126.6(e)(3)(B) states:

SBPDD-25

*If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed.*

Additionally, Section 15126.6(e)(3)(A) states:

February 27, 2023  
Page 9 of 10

*When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future.*

Finally, Section 15126.6(e)(3)(C) states:

*After defining the no project alternative using one of these approaches [identified in Section 15126.6(e)(3)(A) and (B)], the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*

The proposed project is not a development project. The proposed project is an annexation of a property into the City of Santa Maria; pre-zoning of the property (effectively rezoning the property from the current County C-2 zoning designation to the City C-2, R-3, and PD Overlay District zone designation); and a General Plan amendment to apply a High Density Residential (HDR-22) and Community Commercial (CC) land use designation. As discussed in the DEIR Project Description, a *conceptual* plan for future development of the project has been prepared to evaluate the potential environmental impacts generated by the *eventual* development of the site if the proposed annexation, pre-zoning, and General Plan amendment were to be approved as proposed. Future project buildout consistent with the proposed pre-zone designations would require individual Planned Development Permit applications requiring discretionary review and environmental review under CEQA at the time any future development is proposed.

The proposed project is subject to Sections 15126.6(e)(3)(A) and 15126.6(e)(3)(C) of the State CEQA Guidelines. The DEIR fails to consider the "no project" alternative as a continuation of the existing plan, policy or operation into the future, and fails to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The proposed project site has an approved Specific Plan (Richard's Specific Plan (83-SP-1). The Specific Plan designates a range of residential densities and other uses for the site, including: residential on 15.6 acres (12 single-family homes, 83 senior units, 23 townhomes, and an 11.7-acre open space recreation area to be located in the portion of the site under the County's "No Build" corridor of the airport approach zone); ministorage and recreational vehicle parking on 1.4 acres; 60,000 sf commercial on 6.2 acres; 30,000 sf professional offices on 4.5 acres; and Union Valley Parkway right-of-way on 3.1 acres.

Development of the site under the existing Specific Plan could accomplish most of the basic objectives of the project and may avoid or substantially lessen significant effects of the proposed project including those mentioned in comments above.

SBPDD-25  
(cont'd)

February 27, 2023  
Page 10 of 10

Thank you for the opportunity to provide comments on the DEIR. If you have any questions or require further information, please contact me at [lpowman@countyofsb.org](mailto:lpowman@countyofsb.org).

Regards,

A handwritten signature in black ink, appearing to read "Lisa Plowman", with a long horizontal flourish extending to the right.

Lisa Plowman, Director  
Planning & Development Department

### 1.2.7.2.1 RESPONSE TO LETTER FROM COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT DEPARTMENT

Comment No.	Response
SBPDD-1	<p>The comment states that SBPDD has reviewed the Draft EIR and includes a brief, high-level description of the proposed project.</p> <p>Because this introductory comment does not contain comments on the EIR, no response is necessary.</p>
SBPDD-2	<p>The comment states that the EIR fails to include a description of the approved Specific Plan on the property (83-SP-1), the Final EIR and Supplemental EIR prepared for the Specific Plan, or the Mitigated Negative Declaration prepared for the demolition of the existing house on the project site in Section 2.3, Chapter 3, or related issue area analysis sections.</p> <p>The approved County of Santa Barbara Specific Plan referenced by the commenter (83-SP-1) would not apply to the project site if the property were to be annexed into the City of Santa Maria and, therefore, it is not relevant to the City's analysis of the project under CEQA. The Specific Plan would not be applicable to the proposed project as the project includes an annexation and pre-zoning of the project site into the City of Santa Maria; therefore, the Specific Plan is not included in Chapter 4, Environmental Impact Analysis. However, in response to the County and SBLAFCO comments on the Draft EIR, the City also provided additional information to compare alternatives in a Partially Recirculated Draft EIR (PRDEIR), which was published and recirculated in January 2024. In the revised Chapter 5, Alternatives Analysis, the City considers a "No Project/No Annexation with OCP Buildout" alternative, which considers the comparative environmental effects of anticipated development under the current County OCP. Under this alternative, the project as proposed would not be approved and annexation of the project site into the City of Santa Maria would not occur. Analysis of this alternative considers the OCP envisioned development of the project site with 141 single-family residential or multifamily units, 60,000 square feet of general commercial, 30,000 square feet of office-professional spaces, and approximately 12 acres of open space and recreational uses (County of Santa Barbara 2022).</p> <p>Further, the EIR has been revised to include a description of the previously prepared Mitigated Negative Declaration prepared for the demolition of the existing house on the project site in Section 4.4, Cultural and Tribal Cultural Resources.</p>
SBPDD-3	<p>The comment provides information that is provided in the EIR and then notes that annexation is not a prerequisite to or requirement for allowing for the use of supplemental water supplies.</p> <p>The commenter is correct that annexation is not a prerequisite to allowing for the use of supplemental water supplies. The objective cited by the commenter is modified in this EIR to provide this clarity. The decision to provide supplemental water is at the discretion of the City. In the past, the City has elected to not provide supplemental water to proposed commercial development on the Richards Ranch site. As well, additional information regarding water supply is provided in Master Response 6, Water Supply.</p>
SBPDD-4	<p>The comment states that the project would present a potentially significant environmental impact if it would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Then, the comment indicates that the EIR does not analyze potentially significant impacts related to aesthetic and visual resources. Further, the comment quotes a section of the EIR related to visual resources indicating that the County has identified both SR 135 and UVP as public view corridors that provide prominent views of the area (County of Santa Barbara 2020).</p> <p>The statement that the EIR does not analyze potentially significant impacts related to aesthetic and visual resources is incorrect. Section 4.1, Aesthetics, provides a thorough analysis of the potentially significant aesthetic and visual resources that would result from the proposed development depicted in the conceptual site plan. The statement quoted by the commenter is correct; the County has identified both SR 135 and UVP as public view corridors and this classification has been considered in the analysis in Section 4.1.</p> <p>As identified in the EIR, the existing visual character of the project site predominantly includes a vacant, relatively flat area covered with low-lying non-native grasses and scattered native scrub vegetation. Two large non-native eucalyptus windrows and numerous individual eucalyptus trees are present mostly along the south side and north side of UVP frontage, and along the eastern border of the project site north of UVP. Section 4.1 of the EIR discloses that future build-out of the proposed project would include the removal of all or most of the existing vegetation on-site to accommodate development, resulting in a notable change in the existing visual character of the project site by inhabitants of the surrounding residential land uses as well as motorists, cyclists, and pedestrians traveling along SR 135, UVP, Orcutt Road, Hummel Drive, Mooncrest Lane, and other public roadways.</p> <p>The project, including the pre-zoning of the project site to PD/C-2 for retail commercial and PD/R-3 for high density residential development as shown in the conceptual development plan, would be</p>



Comment No.	Response
	<p>consistent with the existing and proposed zoning and land use designations. Any proposed future development at the project site would require discretionary Planned Development entitlements that would be required to adhere to the guidance set forth in City Municipal Code Section 12-39 for design review, ensuring height and setback requirements are met and all structures are visually complementary to surrounding uses. Additionally, City Municipal Code Section 12-44 provides landscape standards to ensure the installation of landscape features that provide the appropriate buffers to soften views of new buildings. With adherence to the City's development and landscape standards, project implementation would not substantially degrade the existing visual character or quality of public views of the project site and its surroundings, nor conflict with applicable zoning and other regulations governing scenic quality. Therefore, the EIR determines that the project would result in less-than-significant impacts related to aesthetic resources.</p> <p>Additional information regarding aesthetics is also provided in Master Response 10, Aesthetics.</p>
SBPDD-5	<p>The comment provides additional comments on the aesthetic and visual resource analysis. The comment introduces the OCP EIR and indicates that the OCP EIR, for which the lead agency was the County of Santa Barbara, identifies significant and unavoidable aesthetic impacts related to fragmentation of continuous open space, including on Key Site 26, which is the same property as the project site.</p> <p>The OCP EIR referenced by the commenter was certified by the County of Santa Barbara and the County adopted a Statement of Overriding Considerations for the significant impacts identified in the EIR to approve the OCP. According to the Visual Resources/Open Space Section of the OCP EIR (Section 5.15), "Because potential development allowed in the proposed Orcutt Community Plan would result in a permanent loss of open space areas, the fragmentation of scenic and natural resources, the degradation of scenic view corridors, the extension of the urban perimeter into rural areas and the transformation of the Orcutt area from semi-rural to urban, impacts to visual resources remain Class I, significant and unavoidable."</p> <p>Since the approval of the OCP, the County has approved many projects in the Orcutt area, which has resulted in further development of the area since the EIR was developed and certified. The existing conditions present when the OCP EIR was developed are different than the current setting. The baseline and existing setting for the Richards Ranch EIR and its associated technical analyses is the time at which the Notice of Preparation was issued for the EIR (early 2022). The OCP EIR was certified in July 1997, almost 25 years prior to the Notice of Preparation for the Richards Ranch EIR. In addition, different lead agencies are free to conclude differently depending upon their individual regulatory context and the information available to them. Also, CEQA case law has evolved significantly in the past 25 years with more clarification and limitation regarding what should be considered a "significant" aesthetic impact within a CEQA analysis. For these reasons, the fact that the County found a significant and unavoidable impact to visual resources and open space when conducting an environmental analysis for the OCP almost 25 years ago does not affect the conclusions of the Richards Ranch EIR. No revisions to the EIR are necessary in response to this comment.</p>
SBPDD-6	<p>The comment indicates that several mitigation measures that apply to Key Site 26 were adopted in the OCP EIR related to Impact VIS-8.</p> <p>The City does not disagree with this comment. However, because the City is analyzing the potential of the site to be annexed into the City of Santa Maria, these mitigation measures would not apply if the annexation were to be approved, as the City would then have local jurisdictional authority, not the County. For that reason, modifications to the EIR are not necessary. See also Master Response 10, Aesthetics, and response to comment SBPDD-4.</p>
SBPDD-7	<p>The comment indicates that many mitigation measures were also incorporated into the County's OCP in the form of policies and regulations, like the development standards contained in DevStd KS26-3.</p> <p>The City does not disagree with this comment. However, because the City is analyzing the potential of the site to be annexed into the City of Santa Maria, these policies and development standards would not apply if the annexation were to be approved, as the City would then have local jurisdictional authority, not the County. For that reason, modifications to the EIR are not necessary. See also Master Response 10, Aesthetics, and response to comment SBPDD-4.</p> <p>It should also be noted that in response to the County and SBLAFCO comments on the Draft EIR, the City also provided additional information to compare alternatives in a PRDEIR, which was published and circulated from January 31 to March 15, 2024. In the revised Chapter 5, Alternatives Analysis, the City considers a "No Project/No Annexation with OCP Buildout" alternative, which considers the comparative environmental effects of anticipated development under the current County OCP. Under this alternative, the project as proposed would not be approved and annexation of the project site into the City of Santa Maria would not occur. Instead, the project site would remain in the jurisdictional boundaries of the County. Under this alternative, allowable development of the project site would be consistent with the land use and zoning as described in the County's OCP (2022). Analysis of this alternative considers the OCP envisioned development of the project site with 141 single-family residential or multifamily units, 60,000 square feet of general commercial, 30,000 square feet of office-</p>

Comment No.	Response
	professional spaces, and approximately 12 acres of open space and recreational uses (County of Santa Barbara 2022).
SBPDD-8	<p>The comment opines that the EIR must analyze and account for impacts to aesthetic and visual resources consistent with the policies and regulations in the County's OCP.</p> <p>The City disagrees. Given the City would be the regulatory authority over the project site should the annexation move forward, the County's OCP would no longer apply. The policies and development standards of the OCP would no longer apply if the annexation were to be approved, as the City would then have local jurisdictional authority, not the County. For that reason, the analysis requested by the SBPDD is not necessary. If the project site were to be annexed into the City of Santa Maria, any proposed future development at the project site would be required to adhere to the guidance set forth in City Municipal Code Section 12-39 for design review, ensuring height and setback requirements are met and all structures are visually complementary to surrounding uses. Additionally, City Municipal Code Section 12-44 provides landscape standards to ensure the installation of landscape features that provide the appropriate buffers to soften views of new buildings. With adherence to the City's development and landscape standards, project implementation would not substantially degrade the existing visual character or quality of public views of the project site and its surroundings, nor conflict with applicable zoning and other regulations governing scenic quality. Therefore, the EIR determines that the project would result in less-than-significant impacts related to aesthetic resources.</p>
SBPDD-9	<p>The comment references previous historical studies that have been conducted for the project site suggests the EIR should identify the impact associated with demolition of an existing farmhouse structure that was determined eligible as a County of Santa Barbara Place of Historic Merit, and incorporate previously documented recommendations and special conditions.</p> <p>Section 4.4.1.2, Historical Resources, has been revised to refer to the previous historical resources documentation that has been completed for the project site and the previous recommendations and special condition that have been developed for demolition of the farmhouse structure that was determined eligible as a County of Santa Barbara Place of Historic Merit. These recommendations and special condition are not applicable to the proposed project and are not appropriate to incorporate as mitigation measures for the proposed project; however, they have been included in the discussion of historical resources to provide further background and context.</p>
SBPDD-10	<p>The comment states that the EIR should include a discussion of the proposed General Plan Amendment's compliance with compatibility criteria for density of residential development and intensity of non-residential development established by the ALUCP for Safety Zone 2, Zone 4, and Zone 6. The comment also states that the EIR does not identify whether the General Plan Amendment has obtained an ALUC determination of consistency with the ALUCP.</p> <p>The EIR provides an analysis of project consistency with the development density standards set forth in the Santa Maria ALUCP and has been updated from the 2022 draft plan to the adopted 2023 plan. This analysis is summarized in EIR Tables 4.7-3 and 4.7-4 (SBCAG 2022, 2023). In addition, on June 20, 2024, SBCAG found the Richards Ranch project, as depicted in the conceptual development plan, to be consistent with the ALUCP. Input and final decision by the Airport Land Use Commission is forthcoming.</p>
SBPDD-11	<p>The comment states that the EIR should address consistency with the County of Santa Barbara and City of Santa Maria Goals and Objectives related to Hazardous Materials and appropriate mitigation should be included to address any significant adverse impacts.</p> <p>The EIR includes a consistency analysis with the City of Santa Maria General Plan Goals and Policies, including those related to Hazardous Materials, in Section 4-9, Land Use and Planning. The proposed project includes an annexation and pre-zoning of the project site into the City of Santa Maria, by which the County of Santa Barbara General Plan, OCP, and Land Use and Development Code would not be applicable to the project site. The conceptual development plan described in Chapter 2, Project Description, would not apply to the site without the site being annexed into the City of Santa Maria, and following the approval of discretionary permit entitlements. Therefore, the EIR evaluates all potential future development of the site that would be allowed by the proposed annexation and pre-zoning for consistency with all relevant city plans and policies that would apply to the site if the annexation were approved. As such, County plans and documents were used for reference only and no changes to the EIR are necessary.</p>
SBPDD-12	<p>The comment states that the EIR does not include consideration of policies from the County of Santa Barbara's General Plan, OCP, or Land Use and Development Code even though the project is located in the unincorporated area and has an approved Specific Plan under County jurisdiction. The comment states that because of this, the EIR fails to analyze the currently applicable policy framework and is not adequate to address conflicts between the proposed project and the currently applicable policies and regulations adopted in the OCP for the purpose of avoiding and mitigating environmental effects identified in the OCP EIR.</p>

Comment No.	Response
	<p>The proposed project includes an annexation and pre-zoning (including a General Plan Amendment) of the project site into the City of Santa Maria, by which the County of Santa Barbara General Plan, OCP, and Land Use and Development Code would not be applicable to the project site. The conceptual development plan described in Chapter 2, Project Description, would not apply to the site without the site being annexed into the City of Santa Maria and the future approval of discretionary permit entitlements by the City of Santa Maria Planning Commission. Therefore, the EIR evaluates all potential future development of the site that would be allowed by the proposed annexation and pre-zoning for consistency with all relevant city plans and policies that would apply to the site if the annexation were approved. As such, County plans and documents were used for reference only and no changes to the EIR are necessary.</p> <p>Nonetheless, to provide the information requested by the County of Santa Barbara, the City has conducted a preliminary analysis of the project's consistency with goals, policies, actions, and development standards in the County Comprehensive Plan and the OCP that are applicable to the various components of the project and the location of Key Site 26, as defined in the OCP. This policy analysis is provided in EIR Volume 2, Appendix D.</p> <p>The analysis in EIR Volume 2, Appendix D does not affect the CEQA analysis for the annexation, given the City would be the regulatory authority over the project site should the annexation be approved by the City and the SBLAFCO. Although policy consistency determinations would not result in direct impacts to the physical environment beyond the potential impacts identified and addressed in the EIR, the policy consistency discussion is provided for informational purposes. Further, it is not the City's responsibility to determine consistency with County policies. For that reason, this analysis is only provided as a preliminary or potential consistency analysis. The City offers great deference to the County in determining consistency with their own policies. In other words, different determinations by the County may be made if a project like Richards Ranch were to be proposed in the County's jurisdiction without the annexation proposal. The County has unique competence to interpret their own policies when applying them. It is also recognized that the County policies reflect a range of competing interests; the County should solely be allowed to weigh and balance their discretion to construe its policies when applying them.</p>
SBPDD-13	<p>The comment indicates that the EIR should include a discussion of noise from surrounding uses and facilities, including but not limited to, traffic along SR 135, Orcutt Expressway, and UVP, as well as overflights associated with the Santa Maria Airport. Further, the comment indicates that the EIR should include appropriate mitigation measures to address any significant adverse impacts.</p> <p>Section 4.10, Noise, and the associated technical appendix to the EIR (Appendix J) thoroughly address the potential for noise impacts, including consideration for noise from surrounding uses and facilities. Section 4.10.5, pages 4.10-29 and 4.10-30 of the EIR includes a discussion of noise from traffic along nearby roadways. No existing major stationary sources of noise were identified that would impact proposed land uses. Predicted on-site traffic noise levels were evaluated in comparison to the City's noise standards for land use compatibility. Mitigation measures were included to ensure consistency with the City's noise standards, which included the construction of noise barriers to reduce predicted exterior noise levels at proposed on-site residential land uses (refer to Mitigation Measure NOI/mm-1.2a). See also Master Response 4, Airport Hazards, and Master Response 12, Noise.</p>
SBPDD-14	<p>The comment indicates that mitigation measures should address impacts to the outdoor living spaces in the proposed residential area.</p> <p>Mitigation Measure NOI/mm-1.2 provides the required mitigation measures requested by the comment.</p>
SBPDD-15	<p>The comment indicates that noise mitigation measures should include more details on the noise barrier walls to ensure that sound attenuation will be sufficient.</p> <p>Mitigation Measure NOI/mm-1.2a would require the construction of noise barriers to reduce on-site noise levels. Noise barriers are described as - "Noise barriers may consist of walls or a combination of walls and earthen berms. Barrier walls should be constructed of masonry block, or material of similar density and usage, with no visible air gaps at the base of the barrier or between construction materials." Recommended barrier heights are depicted in Figure 4.10-6. With implementation of proposed mitigation measures, predicted on-site noise levels would not exceed the City's noise standards.</p>
SBPDD-16	<p>The comment requests that analysis of the traffic noise levels in Appendix J be updated to reflect any increases to traffic trips as traffic analyses for the proposed conceptual development are updated in response to comments.</p> <p>Updates have been made accordingly in Section 4.10, Noise, as provided in the Final EIR. Given the minor adjustments to the traffic noise levels, an update to Appendix J was determined to not be necessary. No changes to the significance conclusions of the technical report in Appendix J nor the conclusions of the EIR are necessary because of these minor refinements.</p>

Comment No.	Response
SBPDD-17	<p>The comment states that the EIR should include a discussion of how the Airport Noise Contour that overlaps the northeast corner of the site was incorporated into mitigation measures ensuring that noise impacts will be less than significant.</p> <p>As depicted in Figure 4.10-4, the projected 60 dBA noise contour for Santa Maria Airport extends onto the northeastern portion of the project site. Predicted exterior noise levels for proposed development would not exceed exterior noise standards for either residential or commercial uses. Within the 60 dBA CNEL noise contour, standard construction is typically sufficient to ensure that predicted interior noise levels of proposed commercial uses would not exceed the commonly applied interior noise standard of 50 dBA CNEL. As a result, the proposed land uses would be considered compatible with the projected airport noise contours. Additional analysis and mitigation measures are not required.</p>
SBPDD-18	<p>The comment indicates that the EIR fails to adequately address the loss of anticipated recreational and open spaces resources in the community and goes on to provide information about recreational resources envisioned by the OCP.</p> <p>An EIR is not required to analyze the loss of future (i.e., yet to be developed and, thus, speculative) recreational and/or open space resources. Rather, the open space and recreation analysis contained in an EIR is typically guided by the most recent State CEQA Guidelines Appendix G checklist questions. For the Richards Ranch EIR, the City chose to use these checklist questions as the guiding threshold for the impact analysis. Thus, the thresholds that have guided the environmental analysis related to parks, recreation, and open space resources are whether the project would result in substantial physical deterioration of existing parks and recreation facilities and/or whether the project would include recreational facilities that may have an adverse physical effect on the environment. Neither of these guiding questions consider the loss of facilities that have yet to be developed. Such an analysis would be speculative and would not fall within the scope of a CEQA analysis. See also Master Response 7, Recreation – Parks and Open Space.</p>
SBPDD-19	<p>The comment indicates that the City should consider a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The comment further opines that the "No Build" area established in the adopted OCP Open Space Area map has the stated purpose of providing a contiguous open space network for the community, to promote recreational opportunities, to avoid hazards, and to minimize impacts to sensitive resources.</p> <p>The EIR includes a thorough analysis of the threshold of whether the project would cause an "environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." Section 4.9.2.4, Consistency with Applicable Plans and Policies, contains this analysis. Further, impact conclusions regarding this consistency analysis begins on page 4.9-45 of the EIR. However, this analysis does not contain an analysis of consistency with the OCP. As noted in previous responses, it is appropriate for the City to exclude consideration of the OCP given the City would be the regulatory authority over the project site should the annexation move forward. If annexation were to occur, the County's OCP would no longer apply and the City would then have local jurisdictional authority, not the County. For that reason, the analysis requested by the SBPDD is not necessary.</p> <p>Nonetheless, to provide the information requested by the County of Santa Barbara, the City has conducted a preliminary analysis of the project's consistency with goals, policies, actions, and development standards in the County Comprehensive Plan and the OCP that are applicable to the various components of the project and the location of Key Site 26, as defined in the OCP. This policy analysis is provided in EIR Volume 2, Appendix D.</p> <p>The analysis in EIR Volume 2, Appendix D does not affect the CEQA analysis for the annexation, given the City would be the regulatory authority over the project site should the annexation be approved by the City and the SBLAFCO. Although policy consistency determinations would not result in direct impacts to the physical environment beyond the potential impacts identified and addressed in the EIR, the policy consistency discussion is provided for informational purposes. Further, it is not the City's responsibility to determine consistency with County policies. For that reason, this analysis is only provided as a preliminary or potential consistency analysis. The City offers great deference to the County in determining consistency with their own policies. In other words, different determinations by the County may be made if a project like Richards Ranch were to be proposed in the County's jurisdiction without the annexation proposal. The County has unique competence to interpret their own policies when applying them. It is also recognized that the County policies reflect a range of competing interests; the County should solely be allowed to weigh and balance their discretion to construe its policies when applying them.</p> <p>It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. While several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning, the land uses envisioned in the original 1997 OCP for the Richards Ranch site have not been updated by the County. More recently, additional airport-related planning has occurred to more clearly understand the current risks and hazards associated with the airport. As a</p>

Comment No.	Response
	<p>result, the current Santa Maria ALUCP, adopted in 2023, should be used as the guiding policy document regarding safety and hazards related to the airport, not the 1997 OCP. The 2023 adopted Santa Maria ALUCP no longer establishes a “No Build” zone in the area referenced by the comment. A full consideration of the airport-related hazards associated with development of the site, including the area identified by the 1997 OCP as a “No-Build” zone is provided in Section 4.7, Hazards and Hazardous Materials.</p>
SBPDD-20	<p>The comment indicates that the EIR should include a discussion of impacts to schools and fire protection and should acknowledge whether new public facilities will be required to serve the proposed conceptual development.</p> <p>The project’s anticipated impacts related to fire protection services and schools are discussed in detail in Section 4.12, Public Services and Recreation. See also Master Response 1, Public Services – Emergency Services.</p> <p>Anticipated environmental effects related to school facilities are discussed in Section 4.12.5, PS Impact 3. This analysis includes the projected student generation rates with project implementation and acknowledges that the project would incrementally introduce new students over the 3-year projected buildout, resulting in an increased demand on existing OUSD and SMJUHSD school facilities serving the project site. As described in the analysis, the project would be subject to pay the state-mandated impact mitigation fees, as the amounts are determined by the school districts and the City. See also Master Response 2, Public Services – School Facilities.</p>
SBPDD-21	<p>The comment indicates that the EIR should address whether the proposed conceptual development would impact capacity at various schools and provides information contained in the EIR about the SMJUHSD already being over capacity and additional information that is provided in the EIR regarding enrollment and the projected number of students generated over the three-year project construction buildout. In response to this comment, the City initiated further discussions with SMJUHSD regarding the District’s ability to accommodate the anticipated number of students generated by project (SMJUHSD 2023). Based on the correspondence, the following additional information has been provided from the SMJUHSD:</p> <p style="padding-left: 40px;">SMJUHSD must accommodate the students generated by the project and could only do so at Ernest Righetti High School. There are no other high schools within the SMJUHSD that could or would accommodate students from this project, due to both school service area boundaries and the lack of capacity at the other high schools (i.e., the other high schools in the SMJUHSD are also over capacity). Additional classrooms and support services would be needed at the existing school site (Ernest Righetti High) to accommodate the project’s estimated student generation, but due to the fluctuations in students and timeline for project approval, the exact needs would be speculative (SMJUHSD 2023).</p> <p>The project Applicant would be required to pay the state-mandated impact mitigation fees pursuant to Senate Bill 50 (Government Code Section 65995 (h)) prior to issuance of the project’s building permit. The payment of these fees is considered full and complete mitigation for project-related impacts to schools. See also Master Response 2, Public Services – School Facilities. No further refinements to the analysis contained in the EIR are necessary.</p>
SBPDD-22	<p>The comment opines that fire protection response times are already less than ideal under current conditions and further states that the EIR should provide additional evidence as to why the proposed conceptual development would not require provision of new or physically expanded fire protection facilities.</p> <p>The EIR adequately analyzes the need for fire protection facilities. The analysis of fire protection services provided in Section 4.12.5 indicates that the project would not require the provision of new or physically altered fire protection facilities due to mutual aid agreements with the SBCFD. Additionally, the annexation of the project site into the SMFD jurisdictional boundaries would include coordination with the County and the City to identify a fair and appropriate Property Tax Sharing Agreement. It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined. See also Master Response 1, Public Services – Emergency Services.</p>
SBPDD-23	<p>The comment indicates that the EIR transportation impact assessment classifies the project as a mixed-use development project for the purpose of analyzing trip generation and traffic and circulation impacts. SBPDD then opines that the project does not appear to qualify as a mixed-use project, and that analysis of the project as a mixed-use project may have resulted in a significant underestimation of project-generated trips and associated traffic and circulation impacts.</p> <p>The Traffic and Circulation Study uses NCHRP 684 to estimate the internal mixed-use trips for the project. This report provides industry-standard procedures for developing mixed-use traffic adjustments. NCHRP 684 defines mixed-use projects as follows:</p>

Comment No.	Response
	<p>Mixed-Use Development: For the purposes of this project, it has been deemed appropriate and necessary to expand this definition to include multi-use developments. A multi-use development is a real estate project of separate uses of differing and complementary, interacting land uses that do not necessarily share parking and may not be internally interconnected except by public street and/or other public transportation facilities.</p> <p>The Richard's Ranch project, as depicted in the conceptual site plan in Chapter 2 of the EIR, meets this definition and should be treated as a mixed-use development.</p> <p>Refer also to response to comments MR-3 and SBPWT-8.</p>
SBPDD-24	<p>The comment indicates that GHG emissions were analyzed using the CalEEMod, version 2020.4.0 based on the proposed land uses identified for the project, and mobile source emissions were calculated based on the vehicle trip-generation rates from the Traffic and Circulation Study. As such, the comment indicates that the traffic related GHG impacts associated with the proposed project may be significantly underestimated.</p> <p>Similar comments were made by the SBAPCD. Refer to response to comments APCD-2 and APCD-3.</p>
SBPDD-25	<p>The comment indicates that the Draft EIR failed to evaluate the "no project" alternative in accordance with Section 15126.6(e)(3)(A) of the State CEQA Guidelines and fails to analyze the impacts of the "no project" alternative in accordance with Section 15126.6(e)(3)(C) of the State CEQA Guidelines. Specifically, the SBPDD requests that the City consider another "no project" alternative, which is development of the project site under the current County Specific Plan (83-SP-1). This comment provides significant background and detail on why SBPDD feels this additional alternative should be included in the EIR.</p> <p>In response to the County and SBLAFCO comments on the Draft EIR, the City has provided additional information to compare alternatives in a PRDEIR, which was published and circulated in January 2024. In the revised Chapter 5, Alternatives Analysis, the City considers a "No Project/No Annexation with OCP Buildout" alternative, which considers the environmental effects of anticipated development under the current County OCP. Under this newly analyzed alternative, the project as proposed would not be approved and annexation of the project site into the City of Santa Maria would not occur. Analysis of this alternative considers the County Specific Plan (83-SP-1) and OCP envisioned development of the project site with 141 single-family residential or multifamily units, 60,000 square feet of general commercial, 30,000 square feet of office-professional spaces, and approximately 12 acres of open space and recreational uses (County of Santa Barbara 2022).</p>

*This page intentionally left blank.*

### 1.2.7.3 County of Santa Barbara Public Works Transportation Division

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



SCOTT D. MCGOLPIN  
Director

February 28, 2023

TO: Scott D. McGolpin, Public Works Director  
County of Santa Barbara

FROM: William Robertson, Transportation Planner  
Public Works, Transportation Division

SUBJECT: **Richards Ranch Annexation DEIR Review, Volume 2: Appendices**

The Santa Barbara County, Public Works Department has reviewed the materials for the above-mentioned project and offers the following comments:

1. ATE Updated Traffic and Circulation Study, Contents: Missing buildout scenario. This is important to make sure the intersections will function properly once the OCP is built out. New and existing intersections need to be evaluated with buildout numbers and if and if this project was not anticipated in the buildout numbers, or is larger than previously analyzed, the difference needs to be added into the buildout volumes. **SBPWT-1**
2. ATE Updated Traffic and Circulation Study, pg. 3: See attached markups. Uncontrolled north-bound and south-bound left turns are not safe due to the high-speed nature of Union Valley Parkway. Turns should be restricted or a roundabout would be appropriate. Signalization may be appropriate but would not be the preferred County option due to cost and long-term maintenance responsibilities. **SBPWT-2**
3. ATE Updated Traffic and Circulation Study, pg. 4: See attached markups. Internal circulation should be improved to prevent dead end roadways. **SBPWT-3**
4. ATE Updated Traffic and Circulation Study, pg. 5: Orcutt Community Plan and Santa Maria City buildout should be included to make sure all intersections operate in all future conditions or to determine if new improvements or rights-of-way will be necessary. **SBPWT-4**
5. ATE Updated Traffic and Circulation Study, pg. 10: Counts older than 2 years do not meet County standards for an acceptable traffic study. Please update. **SBPWT-5**
6. ATE Updated Traffic and Circulation Study, pg. 11: See attached markups. Add the intersections of Lakeview/Bradley, Foster/Bradley and Foster/Hummel Drive. Additionally, add Clark/135 NB, Clark/135 SB, Clark/Orcutt Frontage Road, Clark/Foxenwood and Foster/California. Study area should be all major intersections within approximately a one-mile radius. **SBPWT-6**

AA/EEO Employer

Thomas D. Fayram, Deputy Director

Julie Hagen, Deputy Director

Chris Sneddon, Deputy Director

Aleksandar Jevremovic, County Surveyor  
[www.countyofsb.org/pwd](http://www.countyofsb.org/pwd)

Leslie Wells, Deputy Director



**COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT  
TRANSPORTATION DIVISION**

123 East Anapamu Street  
Santa Barbara, CA 93101  
(805) 568-3000



one  
COUNTY  
one  
FUTURE

**SCOTT D. MCGOLPIN**  
Director

7. ATE Updated Traffic and Circulation Study, pg. 12: Existing Union Valley Parkway/Hummel Drive intersection does not meet County Level of Service Standards.

**SBPWT-7**

8. ATE Updated Traffic and Circulation Study, pg. 15: The internal capture analysis is completely inaccurate as this is not a mixed use development as defined by NCHRP 684. NCHRP 684 defines an internal trip as follows:

Internal Trip: An internal trip, as defined by ITE, is one that is made without utilizing the major road system (2, p. 85). For the purposes of this project, the definition is expanded to include travel within a highly interactive area containing complementary land uses and convenient internal on- or off-street connections that may use short segments of major streets. An example might be a one-block development consisting of residential, office, and retail buildings with convenient sidewalk connections between them and a single parking facility serving all three land uses

**SBPWT-8**

Each quadrant of the project should undergo a separate mixed-use analysis. Combining all quadrants as a single mixed-use development is not consistent with methodology and will significantly reduce projects impacts

Additionally, the pass-by analysis needs to be more transparent and show, on a clear diagram, the volumes reduced on the main roadway (as negative values) and the trips reassigned (as positive values) to the driveways and turn pockets.

9. ATE Updated Traffic and Circulation Study, pg. 16: The pass-by percentages are very high. 10% of adjacent roadway volumes and a max of 25% project total are use commonly and are more appropriate as this will reduce project impacts significantly.

**SBPWT-9**

10. ATE Updated Traffic and Circulation Study, pg. 19: Existing + project, Union Valley Parkway/Hummel Drive intersection does not meet County Level of Service Standards

**SBPWT-10**

11. ATE Updated Traffic and Circulation Study, pg. 24: Cumulative + project, Union Valley Parkway/Hummel Drive intersection does not meet County Level of Service Standards

**SBPWT-11**

12. ATE Updated Traffic and Circulation Study, pg. 25: County Roadway Segment Operations. This section is not a consistent analysis in line Santa Barbara County roadway segment analysis procedures. Please update and analyze each County segment for consistency.

**SBPWT-12**

13. ATE Updated Traffic and Circulation Study, pg. 28: Full access should not be provided at the parcel 2/parcel 4 driveway along Union Valley Parkway due to the high potential for left-turn/through collisions. Review and redesign for turn restrictions.

**SBPWT-13**

14. ATE Updated Traffic and Circulation Study, pg. 30: Median should be provided per attached markups at the driveway between parcel 2/parcel 4 along Union Valley Parkway.

**SBPWT-14**

15. ATE Updated Traffic and Circulation Study, pg. 32: Orcutt Road median should be extended per attached markups to prevent wrong way egress.

**SBPWT-15**

AA/EEO Employer

Thomas D. Fayram, Deputy Director

Julie Hagen, Deputy Director

Chris Sneddon, Deputy Director

Aleksandar Jevremovic, County Surveyor

[www.countyofsb.org/pwd](http://www.countyofsb.org/pwd)

Leslie Wells, Deputy Director

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



**SCOTT D. MCGOLPIN**  
Director

16. ATE Updated Traffic and Circulation Study, pg. 34: Orcutt Road intersection with parcel 4A does not meet County design standards. This intersection is not the best location due to sight distance limitations of the curve. This also does not meet the minimum 75-foot distance from the property line required by County Standards. An alternate and safer location should be considered for this intersection or the road should be modified (roundabout) to make the intersection operations safer. Egress left-turn conditions could also be considered but would need strong median deterrents to be feasible. **SBPWT-16**
17. ATE Updated Traffic and Circulation Study, pg. 37: Union Valley Parkway/Parcel 2 intersection is not consistent with County LOS standards. **SBPWT-17**
- If all intersection operations within the table are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed-use project and volume reductions should not reflect such. **SBPWT-18**
18. ATE Updated Traffic and Circulation Study, pg. 38: The queueing analysis does not appear to reflect a project of this size. Please check and revise the analysis if necessary. **SBPWT-19**
19. ATE Updated Traffic and Circulation Study, pg. 39: The queueing analysis does not appear to reflect a project of this size. Please check and revise the analysis if necessary. **SBPWT-20**
- Sight distance should be evaluated in detail as part of the DEIR for each driveway location and be clearly shown in a separate exhibit. It should also note the roadway design speed and the required AASHTO stopping sight distance requirement. **SBPWT-21**
20. ATE Updated Traffic and Circulation Study, pg. 40: The Union Valley Parkway/Parcel 2 intersection is potentially dangerous as shown, and should be redesigned. Full access on a high-speed roadway has the potential to cause severe/fatal collisions. Signal/Stop Warrants should be provided and turn restrictions should be applied to north-bound and south-bound through/left turn movements at minimum. The County does not support full access at this location. **SBPWT-22**
- ATE Updated Traffic and Circulation Study, pg. 41: If all intersection operations within the table are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed-use project and volume reductions should not reflect such. **SBPWT-23**
21. ATE Updated Traffic and Circulation Study, pg. 43: If all intersection operations within the table are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed-use project and volume reductions should not reflect such. **SBPWT-24**
- Accident Analysis should be updated to reflect the most recent data available. **SBPWT-25**
22. ATE Updated Traffic and Circulation Study, pg. 45: Signal/Stop warrants should be provided for all project driveways to public roads as required by County Standards for arterials and collectors. **SBPWT-26**
23. ATE Updated Traffic and Circulation Study, pg. 48: This is NOT a mixed-use project as defined in NCHRP 684 as the project uses public roads to move to and from each parcel. This is a fatal flaw in the ATE. **SBPWT-27**

Thomas D. Fayram, Deputy Director

Julie Hagen, Deputy Director

Chris Sneddon, Deputy Director

Aleksandar Jevremovic, County Surveyor

Leslie Wells, Deputy Director

[www.countyofsb.org/pwd](http://www.countyofsb.org/pwd)

COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT  
TRANSPORTATION DIVISION

123 East Anapamu Street  
Santa Barbara, CA 93101  
(805) 568-3000



SCOTT D. MCGOLPIN  
Director

transportation analysis which needs to be corrected. Each parcel is able to perform a separate mixed-use analysis, but all parcels cannot be combined to be labeled a mixed-use project. County staff will not support any further submittal that shows all parcels as a combined mixed-use project since it will massively and erroneously reduce the roadway impacts to the community.

↑  
SBPWT-27  
(cont'd)

24. ATE Updated Traffic and Circulation Study, pg. 50: VTM Estimate with Mixed Use Reduction is erroneous since this project is not a mixed-use development as defined by NCHRP 684. Please update the VTM analysis to reflect the appropriate mixed-use analysis.

↑  
SBPWT-28

25. All roadways should be modeled for anticipated future volumes and widened as necessary. County of Santa Barbara standards identify proper roadway volumes for both two and four-lane roadways. All roads should be constructed to AASHTO standards and should be built to State complete street guidelines to include facilities for all anticipated users. Multi-modal paths, sidewalks, bike lanes, and dedicated vehicle travel lanes should all be considered in the complete street design.

↑  
SBPWT-29

26. A thorough VMT analysis should be completed as part of the TIS/EIR. The project should be designed to minimize project VMT through the use of mixed-use land planning, bus service, bike infrastructure, enhanced walkability, car share programs and/or relocation of the project, or a portion thereof, to a different location on to provide more accessible services and reduced trip lengths.

↑  
SBPWT-30

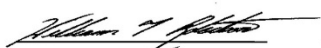
27. Roadway annexations shall conform to the following criteria.

- Annex Orcutt Frontage Road north of the proposed project to a tangent section. It is impractical to conform road maintenance in a curve.
- Annex Union Valley Parkway to the eastern project limit.
- Annex to the southern limit on Orcutt Frontage Road or 250 feet south of any proposed intersection, whichever is greater. Having a boundary at or near an intersection is problematic for maintenance and for establishing traffic operational control.

↑  
SBPWT-31

If you have any questions, please contact me at 805-803-8785.

Sincerely,

  
William T. Robertson  
Date

AA/EEO Employer

Thomas D. Fayram, Deputy Director

Julie Hagen, Deputy Director

Chris Sneddon, Deputy Director

Aleksandar Jevremovic, County Surveyor

Leslie Wells, Deputy Director

[www.countyofsb.org/pwd](http://www.countyofsb.org/pwd)

---

**RICHARDS RANCH PROJECT**  
**CITY OF SANTA MARIA, CALIFORNIA**

---

**UPDATED TRAFFIC AND CIRCULATION STUDY**

---



SBPWT-32

---

October 7, 2022

ATE #21069

---

MD3 Investments  
San Luis Obispo, CA

---



**ASSOCIATED TRANSPORTATION ENGINEERS**

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805) 687-4418 • FAX (805) 682-8509



**ASSOCIATED TRANSPORTATION ENGINEERS**

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805)687-4418 • FAX (805)682-8509 • [main@atesb.com](mailto:main@atesb.com)

Since 1978

Richard L. Pool, P.E.  
Scott A. Schell

October 7, 2022

21069R03

Michael Stoltey  
MD3 Investments  
San Luis Obispo, CA

**UPDATED TRAFFIC AND CIRCULATION STUDY  
FOR THE RICHARDS RANCH PROJECT, CITY OF SANTA MARIA**

Associated Transportation Engineers (ATE) has prepared the following updated traffic and circulation study for the Richards Ranch Project, located in the City of Santa Maria. The study evaluates Existing + Project and Cumulative + Project traffic conditions in order to determine the Project's consistency with the City's transportation policies; and determines the Project's potential CEQA traffic impacts based on the City's adopted "Vehicle Miles Traveled" (VMT) impact criteria.

We appreciate the opportunity to assist you with the project.

Associated Transportation Engineers

A handwritten signature in black ink, appearing to read 'Scott A. Schell'.

Scott A. Schell  
Principal Transportation Planner

**SBPWT-32  
(cont'd)**

## CONTENTS

INTRODUCTION .....	1
PROJECT DESCRIPTION .....	1
TRAFFIC ANALYSIS SCENARIOS .....	5
EXISTING CONDITIONS .....	5
Existing Street Network .....	5
Intersection Operations .....	10
TRAFFIC POLICY STANDARDS .....	12
City of Santa Maria Standard .....	13
Santa Barbara County Standard .....	13
EXISTING + PROJECT CONDITIONS .....	13
Project Trip Generation .....	13
Internal Capture Trip Analysis .....	15
Commercial Pass-By/Primary Trip Analysis .....	15
Project Trip Distribution .....	17
Existing + Project Intersection Operations .....	19
CUMULATIVE CONDITIONS .....	21
Cumulative Traffic Volumes .....	21
Cumulative Intersection Operations .....	21
Roadway Segment Operations .....	25
SITE ACCESS AND CIRCULATION .....	25
Driveway Operations .....	35
UVP/Parcel 2 Easterly & Parcel 4 Driveways .....	39
UVP QUEUING ANALYSIS .....	41
ACCIDENT ANALYSIS .....	43
SIGNAL WARRANT ANALYSIS .....	45
RECOMMENDED IMPROVEMENTS .....	46
UVP/Hummel Drive Intersection .....	46
VMT ANALYSIS .....	48
TECHNICAL APPENDIX .....	54

SBPWT-32  
(cont'd)

Missing buildout scenario. This is important to make sure the intersections will function properly once the OCP is built out. New and existing intersections need to be evaluated with buildout numbers and if and if this project was not anticipated in the buildout numbers, or is larger than previously analyzed, the difference needs to be added into the buildout volumes.

# TABLES

Table 1	Assumed Land Use Statistics .....	1
Table 2	Existing Levels of Service.....	12
Table 3	Project Trip Generation.....	14
Table 4	Project Trip Generation – Internal & External Trip Breakdown .....	15
Table 5	Project Trip Generation – Commercial Trip Breakdown .....	16
Table 6	Project Trip Generation – External Trip Summary .....	16
Table 7	Project Trip Distribution.....	17
Table 8	Existing + Project Levels of Service – AM Peak Hour .....	19
Table 9	Existing + Project Levels of Service – PM Peak Hour.....	19
Table 10	Cumulative + Project Levels of Service – AM Peak Hour .....	24
Table 11	Cumulative + Project Levels of Service – PM Peak Hour .....	24
Table 12	AM Peak Hour Project Driveway Operations - .....	
	Cumulative + Project Conditions.....	35
Table 13	PM Peak Hour Project Driveway Operations - .....	
	Cumulative + Project Conditions.....	37
Table 14	AM Peak Hour Driveway Queues - Cumulative + Project Conditions .....	38
Table 15	PM Peak Hour Driveway Queues - Cumulative + Project Conditions.....	39
Table 16	Cumulative + Project AM Peak Hour .....	
	Storage Length and Left-Turn Queues and Storage Requirements .....	41
Table 17	Cumulative + Project PM Peak Hour .....	
	Storage Length and Left-Turn Queues and Storage Requirements .....	43
Table 18	UVP Intersections - Accident Rates .....	44
Table 19	Signal Warrant Analysis Results – UVP/Hummel Drive.....	45
Table 20	Intersection Levels of Service With Improvements .....	46
Table 21	Residential Component VMT Comparison to City Threshold .....	50
Table 22	Retail Component – Net Change in VMT .....	52

SBPWT-32  
(cont'd)

## FIGURES

Figure 1	Project Site Location .....	2
Figure 2a	Project Site Plan - Commercial .....	3
Figure 2b	Project Site Plan - Residential.....	4
Figure 3	Existing Street Network .....	6
Figure 4a	Santa Maria Bikeway Master Plan.....	8
Figure 4b	Santa Maria Pedestrian Master Plan.....	9
Figure 5	Existing Traffic Volumes.....	11
Figure 6	Project Trip Distribution and Assignment (Primary and Pass-By) .....	18
Figure 7	Existing + Project Traffic Volumes .....	20
Figure 8	Cumulative Traffic Volumes .....	22
Figure 9	Cumulative + Project Traffic Volumes .....	23
Figure 10	Parcel 1 and Parcel 2 – Orcutt Road Driveways .....	27
Figure 11	Parcel 2 and Parcel 4A – Union Valley Parkway Driveways .....	28
Figure 12a	UVP Interim Transition Plan.....	30
Figure 12b	UVP Long Term Transition Plan.....	31
Figure 13	Parcel 3 – Orcutt Road Driveways .....	32
Figure 14	Parcel 4A and Parcel 4B – Orcutt Road Driveway .....	34
Figure 15	Cumulative + Project Driveway Traffic Volumes .....	36
Figure 16	Storage Length, Cumulative + Project Traffic Volumes, and LOS at UVP/Parcel 2 Easterly & Parcel 4 Driveways .....	40
Figure 17	Left Turn Channels at UVP/Orcutt Road and Orcutt Expressway .....	42
Figure 18	Union Valley Parkway/Hummel Drive – Future Intersection Design .....	47

SBPWT-32  
(cont'd)



## INTRODUCTION

The following updated report contains analyses of the traffic and circulation issues associated with the Richards Ranch Project (the "Project"), proposed in the City of Santa Maria. The report evaluates existing and future traffic operations within the Project study area and assesses the Project's consistency with City's adopted transportation policies. An analysis of site access and circulation is also provided. The roadways and intersections analyzed in the study were determined based on input provided by City of Santa Maria staff. An evaluation of the Project's potential CEQA impacts is also provided based on the City's CEQA requirements for Vehicle Miles Traveled (VMT) adopted under Senate Bill 743. The updated study addresses the comments provided in the January 20, 2022 and August 23, 2022 comment letters submitted by City Public Works staff (Mr. Mark Mueller) and Central Coast Transportation Consulting.

## PROJECT DESCRIPTION

The Project consists of 4 separate parcels located adjacent to the Union Valley Parkway/Orcutt Road and Union Valley Parkway/Orcutt Expressway intersections in the southwestern portion of the City of Santa Maria. Figure 1 shows the location of the 4 parcels. The parcels are currently located within Santa Barbara County and would be annexed to the City of Santa Maria. The proposed zoning for three parcels would be C-2 commercial and the proposed zoning for the remaining parcel would be R-3 residential.

Figure 2a presents the preliminary site plan for the commercial parcels and Figure 2b presents the preliminary site plan for the residential parcel. As shown, the two smaller parcels located west of Orcutt Road would be zoned C-2 commercial and would contain auto service uses and a restaurant. The larger parcel located north of the Union Valley Parkway (UVP) would be zoned C-2 commercial and would contain a shopping center, restaurants, and a mini-storage. The two parcels located south of the UVP would be zoned R-3 Residential and would contain apartments and townhomes. Table 1 provides a summary of the land uses assumed for each parcel for this study.

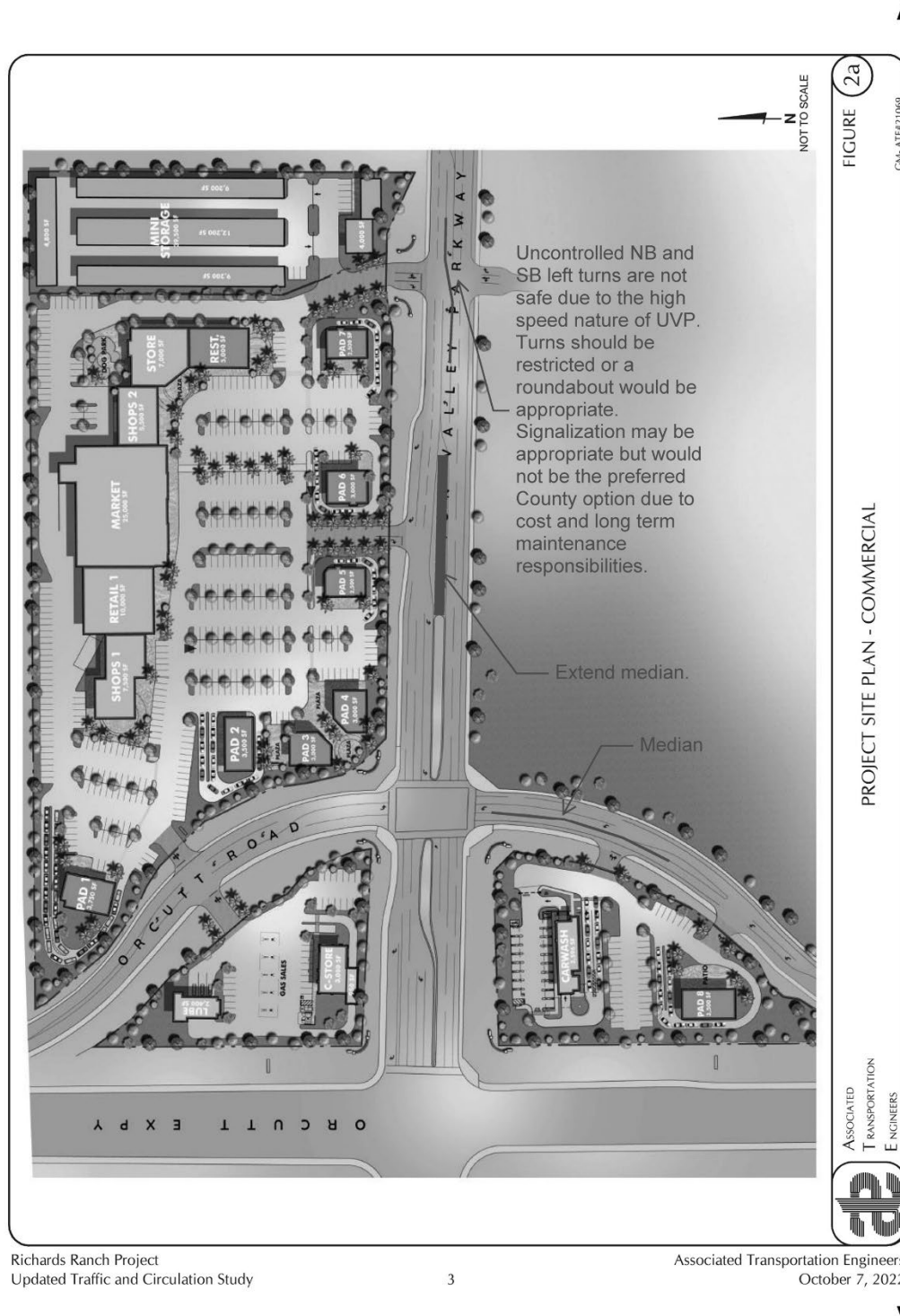
**Table 1**  
**Assumed Land Use Statistics**

Parcel	Zoning	Land Use	Size
Parcel 1 (Northwest)	C-2 Commercial	Gas Station with Mart(a) Lube Station(b)	10 Fueling Positions 3 Bays
Parcel 2 (Northeast)	C-2 Commercial	Shopping Center Sit-Down Restaurant Fast-Food Restaurant w/DT (5) Fast Casual Restaurant (2) Mini Storage	55,500 SF 5,000 SF 15,250 SF 6,000 SF 39,500 SF
Parcel 3 (Southwest)	C-2 Commercial	Car Wash-Automated Fast-Food Restaurant w/DT	1 Tunnel 3,500 SF
Parcel 4A (Southeast)	R-3 Residential	Three-Story Apartments	400 Units
Parcel 4B (Southeast)	R-3 Residential	Two-Story Townhomes	95 Units

(a) Gas Station Convenience Market contains 3,950 SF of building area.

(b) Lube Station contains 2,400 SF of building area.





SBPWT-32  
(cont'd)



## TRAFFIC ANALYSIS SCENARIOS

The following scenarios are included in the traffic and circulation analysis.

*Existing Conditions:* This scenario describes the existing street network and evaluates peak hour operations at the key study-area intersections identified for analyses.

*Existing + Project:* This scenario evaluates traffic operations assuming Existing + Project traffic forecasts. The Project's consistency with City transportation policies is evaluated for this scenario.

*Cumulative Conditions:* This scenario evaluates traffic operations assuming the additional traffic that will be generated by approved and pending developments located in the adjacent areas of the City and the County of Santa Barbara. Traffic volumes generated by the approved and pending projects are layered onto the Existing baseline traffic forecasts for analyses.

*Cumulative + Project:* This scenario evaluates operations assuming the Cumulative conditions plus the traffic generated by the Project. The Project's consistency with City transportation policies is evaluated for this scenario.

**EXISTING CONDITIONS** OCP and SM City buildout should be included to make sure all intersections operate in all future conditions or to determine if new improvements or rights-of-way will be necessary.

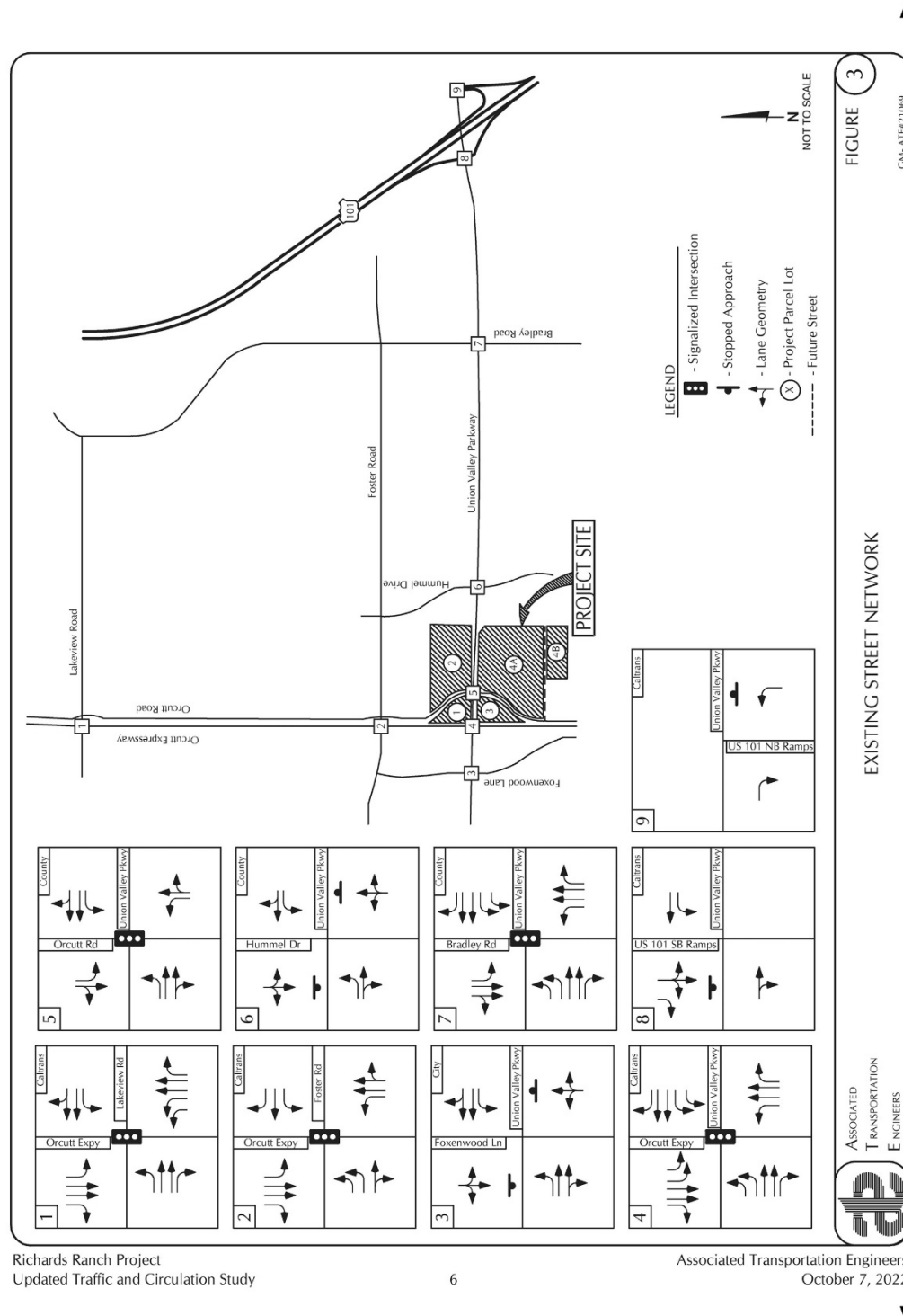
### Existing Street Network

The Project site is served by a network of highways, arterial, and collector streets, as shown on Figure 3. The following text provides a brief discussion of the major components of the street network in the study area.

US 101, located east of the Project site, is a freeway that serves as the major north-south link through the Santa Maria Valley and is the principal inter-city route along the Pacific Coast. US 101 is a 6-lane freeway within the Santa Maria area, with 4 lanes provided north and south of the City. Access to the Project site from US 101 is provided via the UVP interchange.

Orcutt Expressway (State Route 135), located west of the of the Project site, is an arterial roadway that extends from US 101 on the north end of the City to its junction with State Route 1 south of the Orcutt community. Within the study-area, Orcutt Expressway is a 4-lane arterial street north of UVP with turn lanes provided at intersections. South of the UVP, Orcutt Expressway becomes a 4-lane freeway. There are no bikeways or sidewalks on the Orcutt Expressway and vehicle access is limited (no driveways or access connections).

SBPWT-32  
(cont'd)



Union Valley Parkway, extends easterly from Blosser Road as a 2-lane arterial roadway to Foxenwood Lane where it widens to 4 lanes. The UVP passes mid-way through the Project site where it transitions from 4 lanes back to 2 lanes. The UVP extends east of the site Project site to its terminus at the US 101 interchange. The UVP provides access between the western areas of the City and Orcutt and US 101. The UVP would provide access to several of the Project parcels via new driveway connections. Within the Project study-area, Class II bike lanes are provided on both sides of the UVP. Additional bicycle improvements proposed in the study-area are shown on Figure 4a, the City's Bicycle Master Plan.

Orcutt Road (Orcutt Frontage Road), located on the west side of the Project site, is a two-lane north-south frontage road that parallels the east side of Orcutt Expressway. Orcutt Road extends from Goodwin Road on the north to Rice Ranch Road on the south. Orcutt Road would provide access to several of the Project parcels via new driveway connections. Class II bikeways are provided on both sides of Orcutt Road adjacent to the Project site.

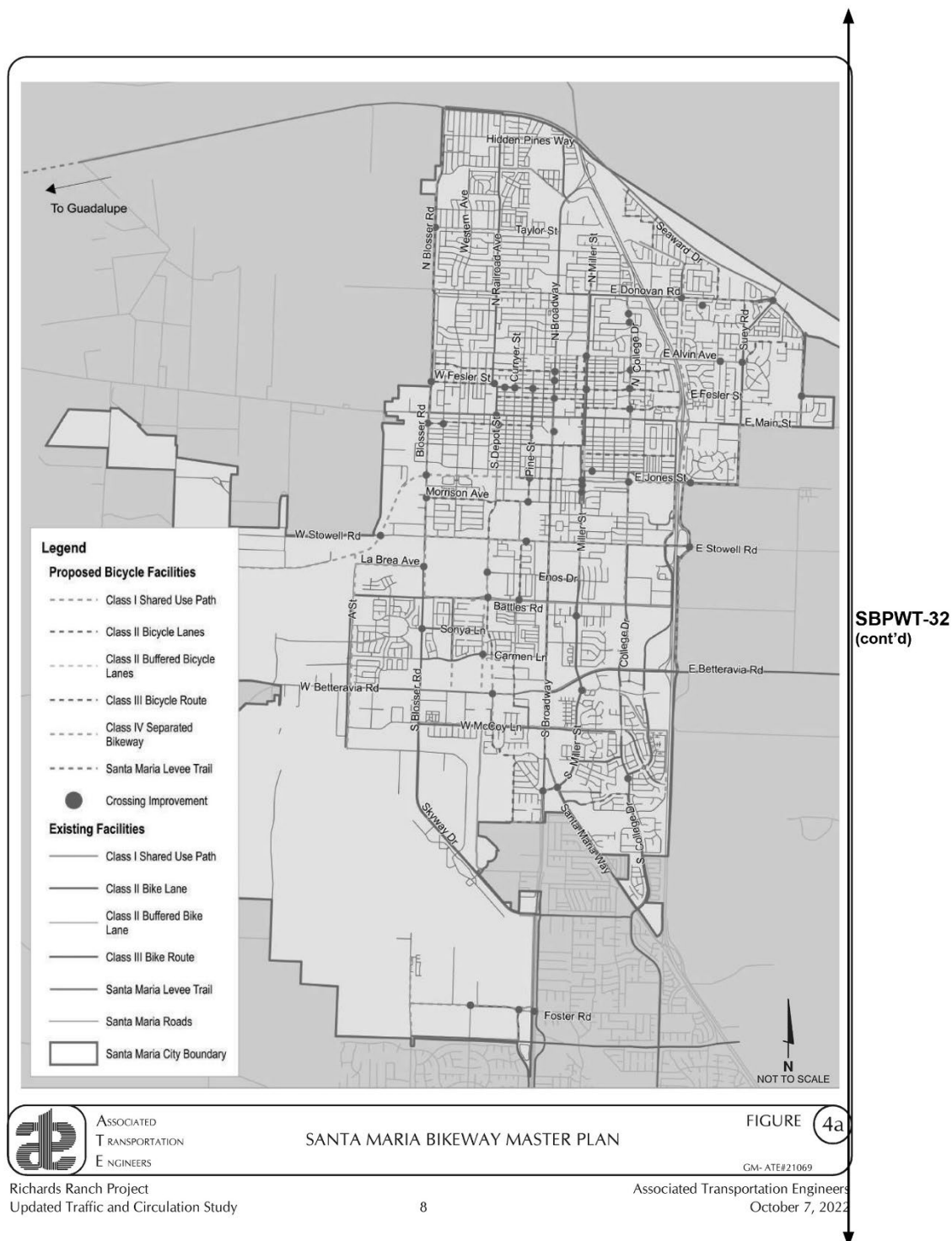
Foxenwood Lane, located west of the Project site, is a two-lane north-south frontage road that parallels the west side of Orcutt Expressway. Foxenwood Lane extends from Foster Road on the north to Clark Avenue on the south. Foxenwood Lane provides access to the residential subdivisions located south of UVP. Class II bike lanes are provided on both sides of the roadway and a Class I bike path extends from the Foster Road terminus north to Skyway Drive.

Foster Road, located north of the Project site is a two-lane east-west collector street within the study area. Foster Road serves primarily institutional and industrial uses west of the Orcutt Expressway and residential uses east of the Orcutt Expressway. No bike lanes are currently provided on Foster Road. The City of Santa Maria Bicycle Master Plan indicates that Class I bike lanes will be provided on Foster Road from the Orcutt Expressway to Blosser Road.

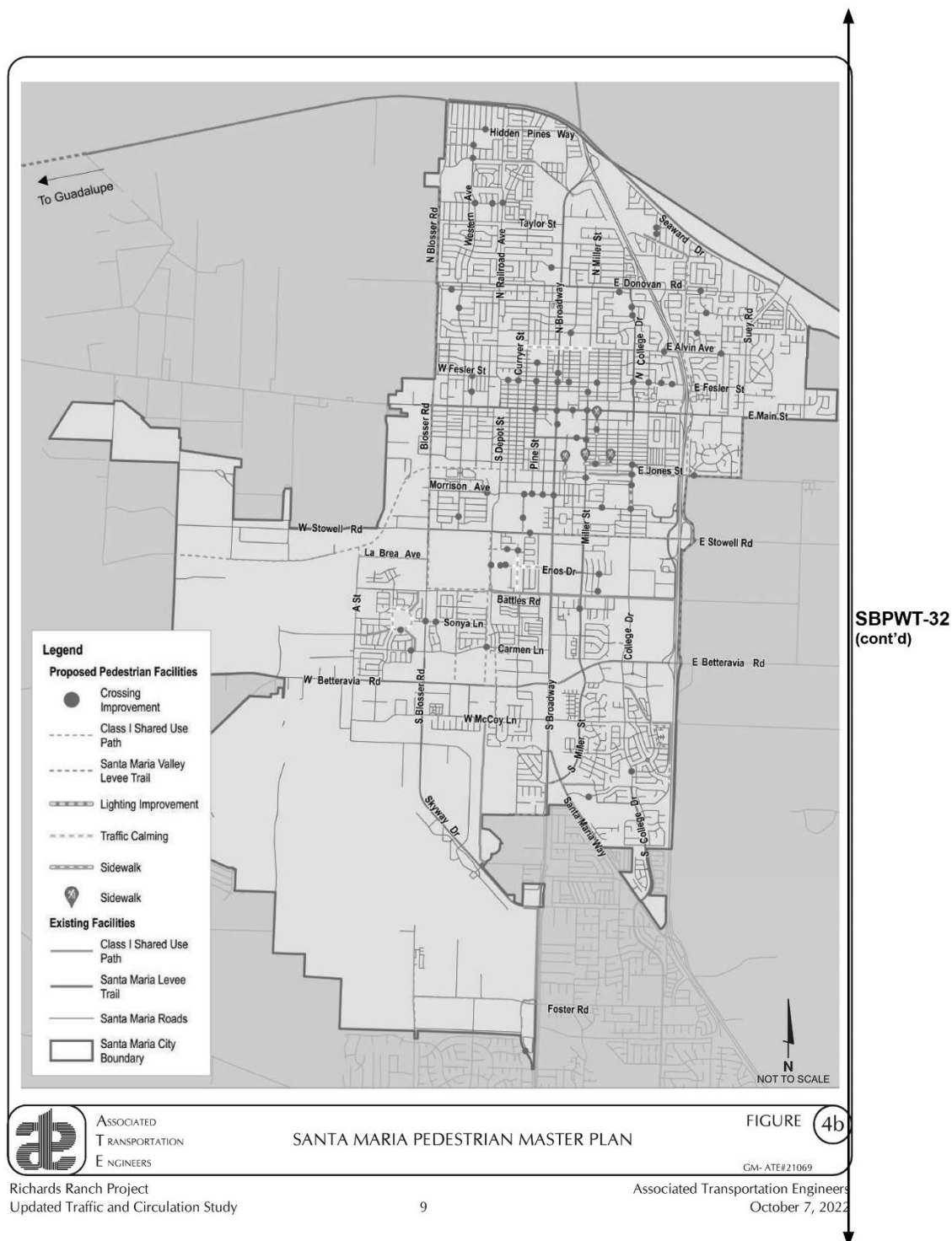
Hummel Drive, located east of the Project site, is a two-lane north-south collector road that extends north from the UVP to Foster Road where it becomes Dartmouth Street; and south from the UVP to its terminus at Patterson Road. Within the Project study-area, no bike lanes are provided on Hummel Drive. It is noted that Hummel Drive is located in Santa Barbara County and would not be annexed to the City as part of the Project.

#### Existing Pedestrian Facilities

Within the Project study area, sidewalks are currently provided on the south side of the UVP and the east side of Orcutt Road. On the north side of the UVP, sidewalks are provided from the Orcutt Expressway to Orcutt Road; and no sidewalks are provided on the west side of Orcutt Road. ADA accessible crosswalks with pedestrian signals heads are provided on all four legs of the UVP/Orcutt Road intersection and three of the four legs of the UVP/Orcutt Expressway intersection. At the UVP/Hummel Drive intersection, a "continental" style crosswalk with flashing beacons is provided on the east leg of the intersection (across the UVP) and standard crosswalks are provided on the north and south legs. Figure 4b shows the pedestrian improvements proposed in the Project study-area in the City's Pedestrian Master Plan.







### Existing Transit Facilities

Transit service in the City of Santa Maria and the community of Orcutt is provided by the Santa Maria Regional Transit (SMRT) service. SMRT Route 6 provides weekday and weekend bus service with 45-minute headways starting at the Crossroads Shopping Center and traveling through Orcutt. The closest transit stops to the Project site are located on Foster Road west of Foxenwood Lane and east of Orcutt Road. The Breeze Bus operates commuter services between the City of Santa Maria, Vandenberg AFB, the City of Lompoc, the community of Los Alamos, the City of Buellton, and the City of Solvang. Breeze Route 100 is a weekday bus service between the Santa Maria and Lompoc Transit Centers with seven trips per day in each direction. The closest stops to the Project site are on Orcutt Road south of Foster Road.

The Clean Air Express bus service, administered by the Santa Barbara Council of Associated Governments (SBCAG), provides service for commuters traveling between northern Santa Barbara County and the Cities of Goleta and Santa Barbara. The closest stop to the project is the Santa Maria Hagerman Softball Complex, where three trips depart each morning to Goleta, and two trips depart each morning to Santa Barbara, with the same number of trips returning in the afternoon. Connections to other services are available at both the Santa Maria and Lompoc Transit Centers.

### Intersection Operations

Because traffic flow on urban arterials is most constrained at intersections, detailed traffic flow analyses focus on the operating conditions of critical intersections during peak travel periods. "Levels of Service" (LOS) A through F are used to rate intersection operations, with LOS A indicating very good operation and LOS F indicating poor operation (more complete definitions are contained in the Technical Appendix for reference). The City of Santa Maria considers LOS D as the performance standard for intersections (maintain LOS D or better), and the County of Santa Barbara considers LOS C as the minimum acceptable operating standard for most intersections (LOS D acceptable for selected locations). Caltrans no longer applies LOS standards in their Transportation Impact Study Guide; instead, they apply VMT thresholds.

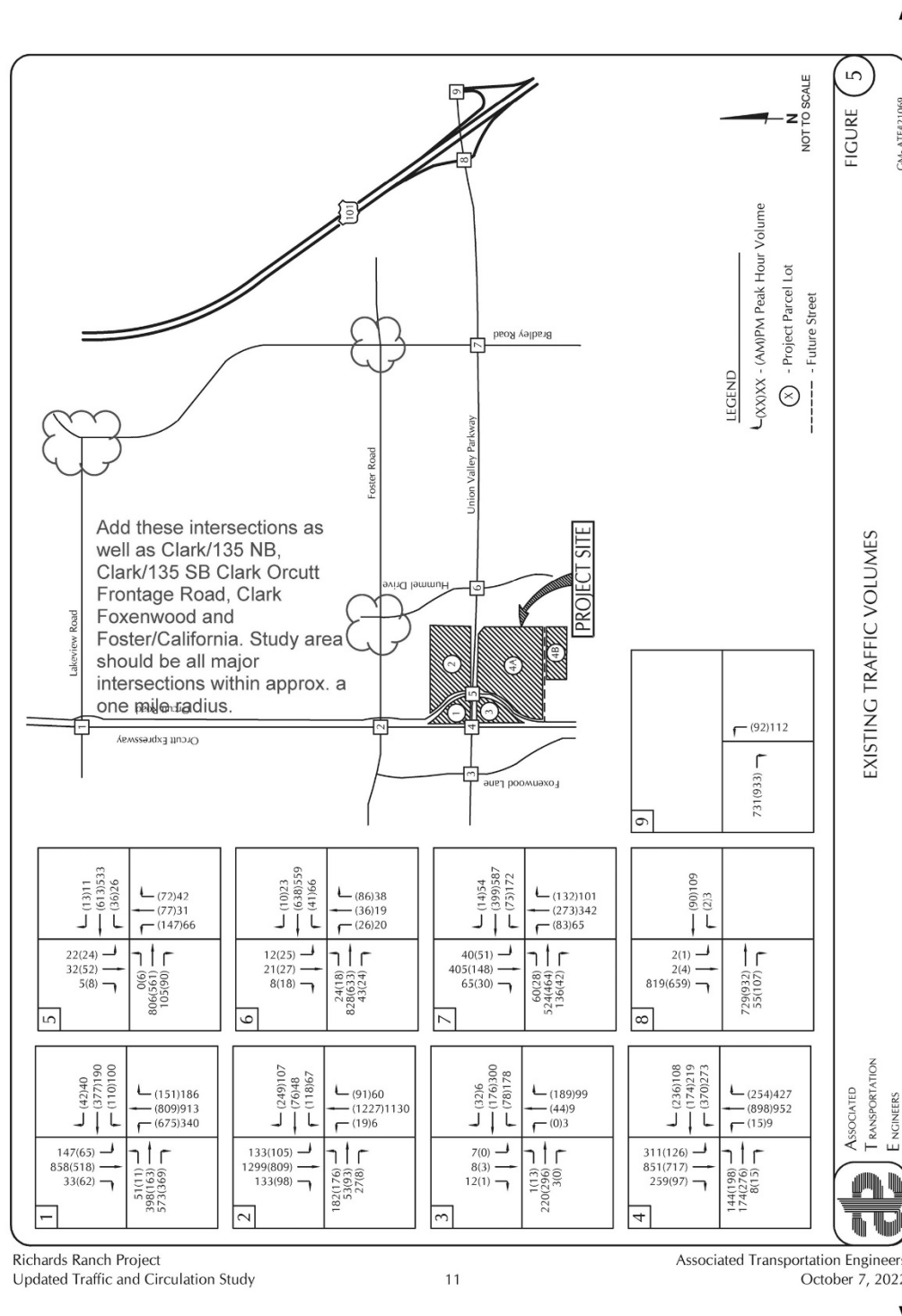
Existing traffic volumes were obtained from traffic count data contained in the Santa Maria Airport Business Park Specific Plan Rezone Transportation Impact Study<sup>1</sup> and the Traffic Impact Study for the Orcutt Community Plan General Plan Amendment Project<sup>2</sup> (see Technical Appendix for count data). New Counts were conducted in 2022 at the UVP/Hummel Drive intersection after the area schools were open. Counts were conducted during the AM peak commuter period (7:00-9:00 AM) and PM peak commuter period (4:00-6:00 PM). The peak 1-hour volumes were then identified for the analysis. Figure 5 presents the existing peak hour traffic volumes for the study-area intersections.

← Counts older than 2 years do not meet County standards for an acceptable study.

<sup>1</sup> Santa Maria Airport Business Park Specific Plan Rezone Transportation Impact Study, Central Coast Transportation Consulting, October, 2020.

<sup>2</sup> Traffic Impact Study for the Orcutt Community Plan General Plan Amendment Project, Psomas, May, 2020.

SBPWT-32  
(cont'd)



Levels of service for the signalized intersections were calculated using the intersection capacity utilization (ICU) methodology adopted by both the City of Santa Maria and the County of Santa Barbara. Levels of service for the STOP-Sign controlled intersections were calculated using the operations methodology outlined in the Highway Capacity Manual.<sup>3</sup> The levels of service for the stop sign controlled intersections are reported as the average weighted delay in seconds for the movements that are required to wait for a gap (rather than for the highest movement or the highest approach), which is the method adopted by both the City and the County. Table 2 lists the existing traffic control, levels of service, and jurisdiction for the study-area intersections identified for the analysis.

**Table 2**  
**Existing Levels of Service**

Intersection	Jurisdiction	Control	AM Peak Hour		PM Peak Hour	
			ICU or Delay	LOS	ICU or Delay	LOS
Orcutt Expressway/Lakeview Rd	Caltrans	Signal	0.61	LOS B	0.66	LOS B
Orcutt Expressway /Foster Rd	Caltrans	Signal	0.71	LOS C	0.64	LOS B
UVP/Foxenwood Ln(a)	City	STOP-Sign	14.3 sec.	LOS B	9.9 sec.	LOS A
UVP/ Orcutt Expressway	Caltrans	Signal	0.62	LOS B	0.63	LOS B
UVP/Orcutt Road	County	Signal	0.46	LOS A	0.47	LOS A
<b>UVP/Hummel Drive(a)</b>	<b>County</b>	<b>STOP-Sign</b>	<b>34.7 sec.</b>	<b>LOS D</b>	<b>34.3 sec.</b>	<b>LOS D</b>
UVP/Bradley Road(a)	County	Signal	0.39	LOS A	0.51	LOS A
UVP/US 101 SB Ramps(a)	Caltrans	STOP-Sign	12.4 sec.	LOS B	15.0 sec.	LOS B
UVP/US 101 NB Ramps(a)	Caltrans	STOP-Sign	9.3 sec.	LOS A	9.4 sec.	LOS A

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

See comment on previous page regarding additional intersections required.

The data presented in Table 2 show that the UVP/Hummel Drive intersection currently operates in the LOS D range during the AM and PM peak hours, which exceeds the County's LOS C standard in this area. The remaining study-area intersections currently operate in the LOS A-C range during the AM and PM peak hours, which meet the City's LOS D operating standard and the County's LOS C - D operating standard.

#### TRAFFIC POLICY STANDARDS

As noted in Table 2, several of the study-area intersections are located in the City of Santa Maria and several of the intersections are located in the County of Santa Barbara. Both the City and County traffic consistency standards were therefore utilized to assess the Project's traffic additions. There are additional intersections that are under Caltrans' jurisdiction. The current Caltrans Transportation Impact Study Guide is based on VMT and not LOS, thus the VMT section of this report addresses the Caltrans requirements.

<sup>3</sup> Highway Capacity Manual, Transportation Research Board, 6<sup>th</sup> Edition, 2016.

These standards are outlined below.

#### City of Santa Maria Standard

The City of Santa Maria Circulation Element considers LOS D acceptable for roadway and intersection operations, with improvements required for LOS E and F.

#### Santa Barbara County Standard

The County thresholds are based on the policies and standards contained in the Orcutt Community Plan (OCP). These thresholds are outlined below.

Policy CIRC-O-3: The County shall maintain a minimum Level of Service C or better on roadways and intersections within the Orcutt Planning Area, except that Minimum LOS shall be "D" for the following roadway segments and intersections:

- Foster Road and Highway 135 intersection
- Lakeview Road and Skyway Drive intersection
- Stillwell Road and Lakeview Road intersection
- All Clark Avenue roadway segments and intersections between Blosser Road on the west and Foxenwood Lane on the east.

#### EXISTING + PROJECT CONDITIONS

##### Project Trip Generation

Trip generation estimates were calculated for the Project using the rates contained in the ITE Trip Generation Manual, 11<sup>th</sup> edition.<sup>4</sup> Table 3 summarizes the trip generation estimates for the Project and lists the specific ITE rates used for each Project component. Worksheets showing the detailed calculations for each parcel are contained in the Technical Appendix.

<sup>4</sup> Trip Generation, Institute of Transportation Engineers, 11<sup>th</sup> Edition, 2021.

**Table 3**  
**Project Trip Generation**

Land Use	Size	ADT		AM Peak		PM Peak	
		Rate	Trips	Rate	Trips	Rate	Trips
<b>Parcel 1</b>							
Gas Station with Mart (a)	10 Fueling Positions	200.80	2,008	16.06	161	18.42	184
Lube Station (b)	3 Bays	40.00	120	3.00	9	4.85	15
<b>Parcel 2</b>							
Shopping Center (c)	55,000 SF	94.49	5,197	3.53	194	9.84	541
Sit-Down Restaurant (d)	5,000 SF	107.20	536	9.57	48	9.05	45
Fast-Food Restaurant w/DT (5) (e)	15,250 SF	467.48	7,129	44.61	681	33.03	505
Fast Casual Restaurant (2) (f)	6,000 SF	97.14	582	1.43	8	12.55	76
Mini Storage (g)	39,500 SF	1.45	57	0.09	4	0.15	6
<b>Parcel 3</b>							
Car Wash-Automated (h)	1 Tunnel	249.00	249	8.50	9	23.70	24
Fast-Food Restaurant w/DT (e)	3,500 SF	467.48	1,636	44.61	156	33.03	116
<b>Parcel 4A</b>							
Apartments (i)	400 Units	6.60	2,639	0.37	147	0.48	193
<b>Parcel 4B</b>							
Townhomes (i)	95 Units	6.60	627	0.37	35	0.48	46
<b>Totals</b>			<b>20,780</b>		<b>1,452</b>		<b>1,751</b>
(a) Trip generation based on ITE Code #945 (Convenience Store/Gas Station). (b) Trip generation based on ITE Code #941 (Quick Lubrication Vehicle Shop). (c) Trip generation based on ITE Code #821 (Shopping Plaza). (d) Trip generation based on ITE Code #932 (High-Turnover (Sit-Down) Restaurant). (e) Trip generation based on ITE Code #934 (Fast-Food Restaurant with Drive-Through Window). (f) Trip generation based on ITE Code #930 (Fast Casual Restaurant). (g) Trip generation based on ITE Code #151 (Mini-Warehouse). (h) Trip generation for Car Wash-Automated derived from local studies. (i) Trip generation based on ITE Code #220 (Multi-Family Housing – Low Rise).							

As shown in Table 3, the Project is forecast to generate 20,780 ADT, with 1,452 AM peak hour trips and 1,751 PM peak hour trips.

SBPWT-32  
(cont'd)

This methodology is not correct. The project does not qualify for a mixed use reduction as applied below per NCHRP 684. Each corner can do a separate mixed use analysis but all 4 as an entirety would no be acceptable to SB Co Public Works and drastically reduces the impacts of the project.

#### Internal Capture Trip Analysis

Given the mix of land uses, there will be some trips that travel between the various parcels that comprise the site and not affect the off-site street network. "Internal Capture" trips include trip interactions between the commercial uses as well as between the commercial uses and residential uses. The ITE mixed-use traffic model was used to estimate the number of trips that would be captured within the site (a copy of the mixed-use model is contained in the Technical Appendix for reference). Based on the results of the model, internal factors of 30% for ADT, 13% for the AM peak hour, and 45% for the PM peak hour were used. The traffic study assumes 45% of the automated carwash customers would come from the service station or convenience market. The 45% capture rate was determined based on data collected at two local service station sites in the Santa Barbara-Goleta area: 1) Mesa Fuel Depot located at 1929 Cliff Drive in Santa Barbara, and 2) Walnut Shell located at 5097 Hollister Avenue in Goleta. Worksheets showing the detailed calculations are contained in the Technical Appendix. Table 4 summarizes the internal/external trip generation estimates for the Project (also see trip generation worksheets in Technical Appendix for details).

**Table 4**  
**Project Trip Generation – Internal & External Trip Breakdown**

Trip Type	ADT	AM Peak	PM Peak
Internal (30% ADT, 13% AM, 45% PM)	6,272	192	787
External (70% ADT, 87% AM, 55% PM)	14,509	1,260	961
<b>Totals</b>	<b>20,781</b>	<b>1,452</b>	<b>1,748</b>

The data presented in Table 4 show that 6,234 ADT, 189 AM peak hour trips, and 787 PM peak hour trips would be internal to the Project site. The remaining 14,547 daily trips, 1,263 AM peak hour trips, and 961 PM peak hour trips would be external to the Project site.

#### Commercial Pass-By/Primary Trip Analysis

Pursuant to ITE recommendations, the trip generation analysis also accounts for "Pass-By" trips and "Primary" trips that would be generated by the retail and restaurant uses. Pass-By trips are trips that would come from the existing traffic streams on Orcutt Expressway, the UVP, and Orcutt Road; and would not affect the study-area street network beyond the Project site. Primary trips are trips with the sole purpose of patronizing the commercial center (i.e., from home to the store and then return home). Based on the data presented in the ITE Trip Generation manual, the Pass-By trip percentages for the shopping center and restaurant uses range between 40% - 55%, the Pass-By trip percentage for the gas station is 75%, and the Pass-By trip percentage for the car wash is 20%. The trip generation worksheets contained in the Technical Appendix show the specific pass-by adjustments applied to each of the uses. Table 5 shows the breakdown of the retail/restaurant Pass-By and Primary trips.

The pass-by analysis needs to be more transparent and show, on a clear diagram, the volumes reduced on the main roadway (as negative values) and the trips reassigned (as positive values) to the driveways and turn pockets.

**Table 5**  
**Project Trip Generation – Commercial Trip Breakdown**

Land Use	Pass-By Percentage	ADT		AM Peak Trips		PM Peak Trips	
		Pass-By Trips	Primary Trips	Pass-By Trips	Primary Trips	Pass-By Trips	Primary Trips
Shopping Center	40%	1,455	2,183	68	101	119	179
Sit Down Restaurants	43%	337	446	21	28	28	38
Fast Food Restaurants w/DT	55%	3,375	2,761	400	328	188	153
Gas Station	75%	1,055	352	105	35	76	25
Car Wash	20%	27	110	1	4	3	10
<b>Totals</b>		<b>6,249</b>	<b>5,852</b>	<b>595</b>	<b>496</b>	<b>414</b>	<b>405</b>

The pass-by percentages are very high. 10% of adjacent roadway volumes and a max of 25% project total are use commonly and are more appropriate as this will reduce project impacts significantly

The data in Table 5 show that the commercial uses would generate 6,249 daily, 595 AM peak hour, and 414 PM peak hour Pass-By trips. The remaining 5,852 daily, 496 AM peak hour, and 405 PM peak hour trips generated by the commercial uses would be the Primary trips.

Table 6 summarizes the total Primary trips that would be external to the site – the trips that would affect the intersections in the study area.

**Table 6**  
**Project Trip Generation – External Trip Summary**

Land use	ADT	AM Peak Trips	PM Peak Trips
Shopping Center	2,183	101	179
Sit Down Restaurants	446	28	38
Fast Food Restaurants w/DT	2,761	328	153
Gas Station	352	35	25
Car Wash	110	4	10
Lube Station	84	8	8
Mini-Storage	40	3	3
Residential	2,286	158	131
<b>Total</b>	<b>8,262</b>	<b>665</b>	<b>547</b>

**SBPWT-32**  
(cont'd)



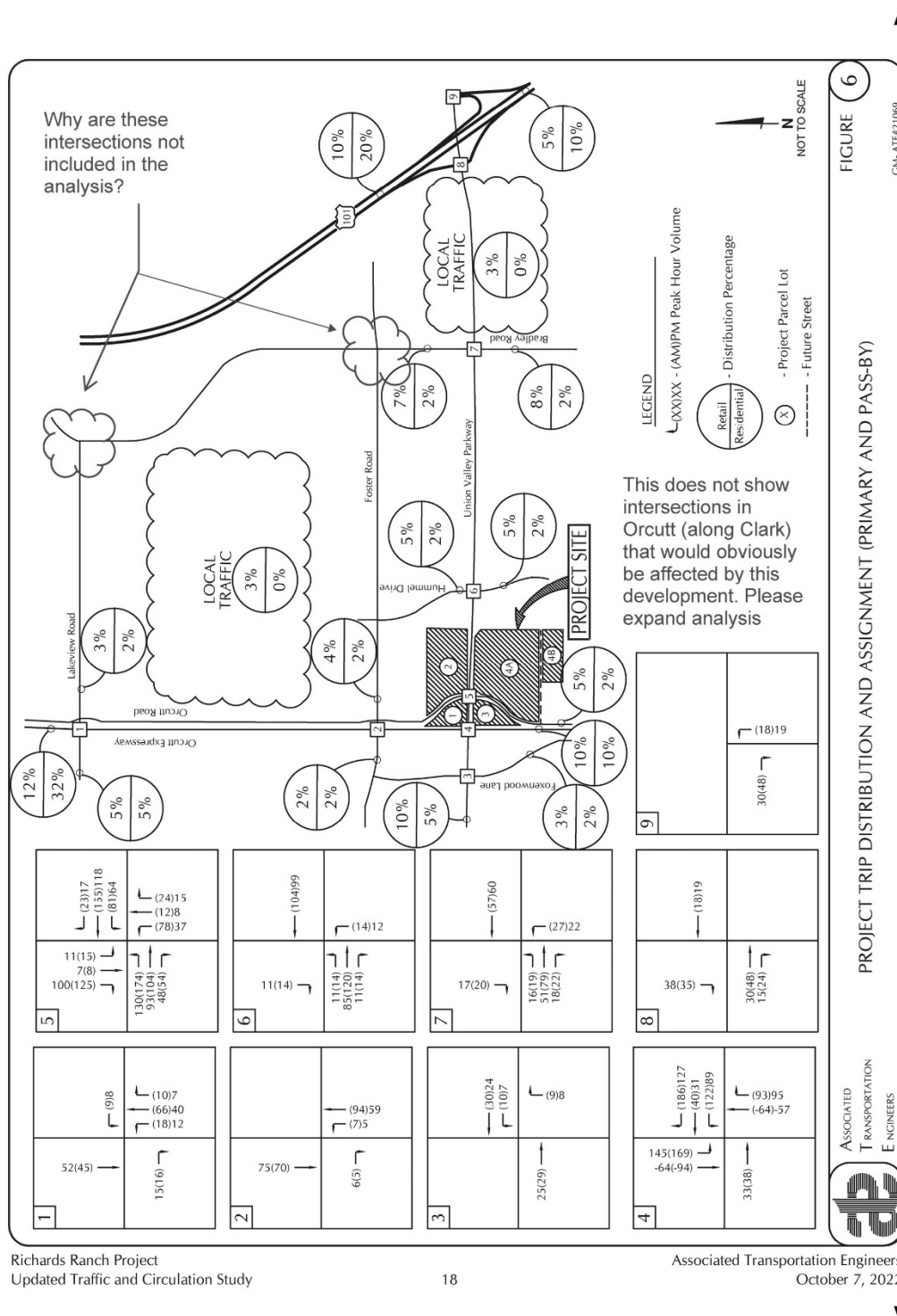
### Project Trip Distribution

The distribution pattern developed for the Project is based on existing traffic counts as well as general knowledge of the population, employment, and commercial centers in the Santa Maria area. Given that the traffic generated by the retail uses would be more locally oriented than the traffic generated by the residential uses, two different distribution patterns were developed for these Project components. The retail pass-by trips were assigned to the driveways and the adjacent intersections based on the existing AM and PM peak hour traffic flows. Table 7 presents trip distribution patterns developed for the Project components and Figure 6 illustrates the distribution and assignment of Project traffic at the study-area intersections.

**Table 7**  
**Project Trip Distribution**

Origin/Destination	Direction	Retail Percentage	Residential Percentage
US Highway 101	North	10%	20%
	South	5%	10%
Orcutt Expressway n/o Lakeview Rd	North	12%	32%
Orcutt Expressway s/o UVP	South	10%	10%
Orcutt Road	North (Local)	3%	0%
	South	5%	2%
Hummel Drive	North	5%	2%
	South	5%	2%
Foxenwood Lane	South	3%	2%
Bradley Road	North	7%	2%
	South	8%	2%
Lakeview Road w/o Orcutt Expressway	West	5%	5%
Lakeview Road e/o Orcutt Expressway	East	3%	2%
Foster Road	East	2%	2%
	West	4%	2%
UVP	East (local)	3%	0%
	West	10%	5%
<b>Totals</b>		<b>100%</b>	<b>100%</b>

SBPWT-32  
(cont'd)



### Existing + Project Intersection Operations

Levels of service were calculated for the study-area intersections assuming the Existing + Project traffic volumes shown on Figure 7. Tables 8 and 9 compare the Existing and Existing + Project level of service forecasts and identify the Project's consistency with the City's LOS D standard and the County's LOS C – D standard.

**Table 8**  
**Existing + Project Levels of Service – AM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.61	LOS B	0.63	LOS B	Yes
Orcutt Expressway /Foster Rd	0.71	LOS C	0.74	LOS C	Yes
UVP/Foxenwood Ln (a)	14.3 sec.	LOS B	15.8 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.62	LOS B	0.67	LOS B	Yes
UVP/Orcutt Road	0.46	LOS A	0.73	LOS C	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.7 sec.</b>	<b>LOS D</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.39	LOS A	0.42	LOS A	Yes
UVP/US 101 SB Ramps (a)	12.4 sec.	LOS B	13.2 sec.	LOS B	Yes
UVP/US 101 NB Ramps(a)	9.3 sec.	LOS A	9.4 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

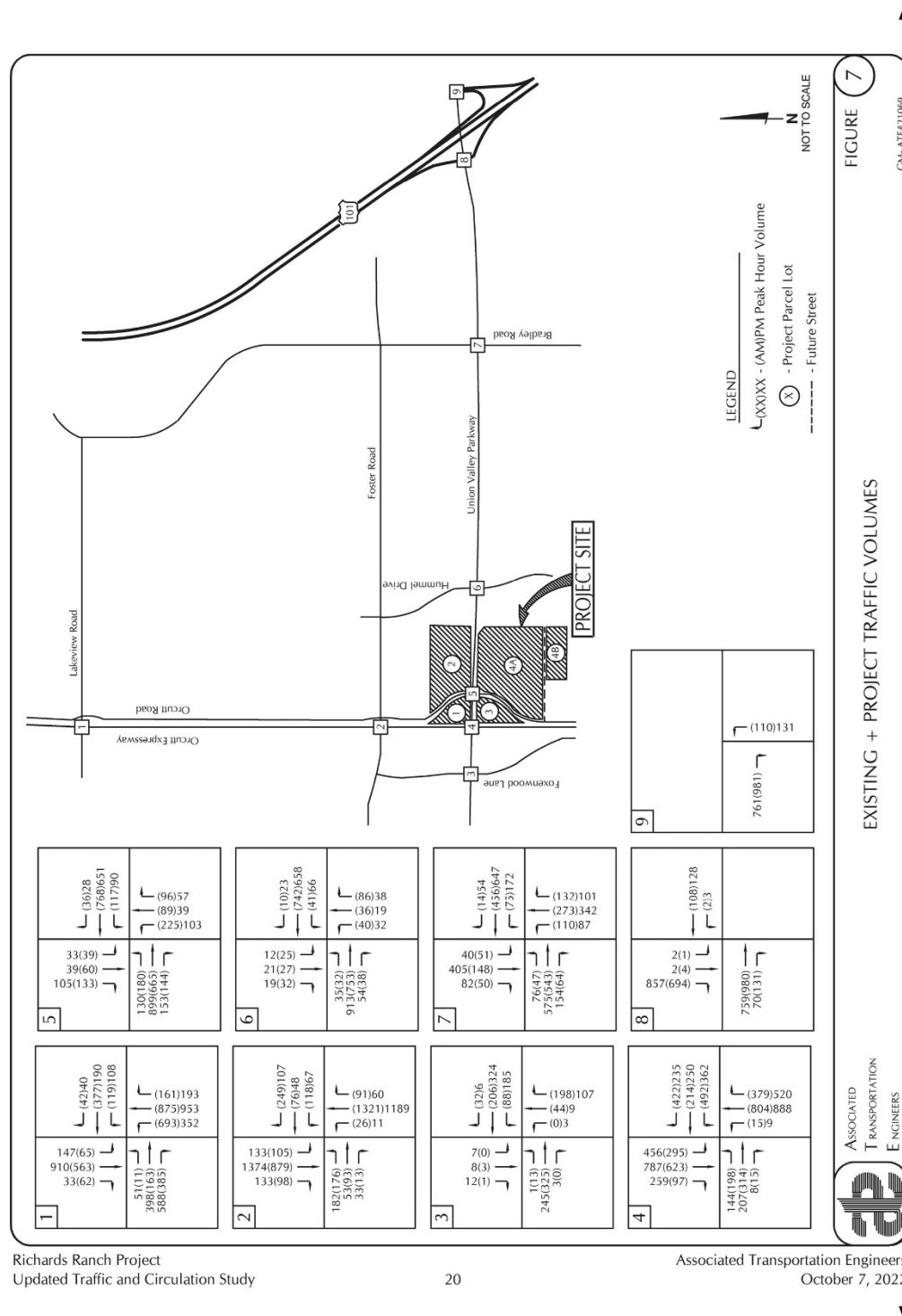
**Table 9**  
**Existing + Project Levels of Service – PM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.66	LOS B	0.69	LOS B	Yes
Orcutt Expressway /Foster Rd	0.64	LOS B	0.66	LOS B	Yes
UVP/Foxenwood Ln (a)	9.9 sec.	LOS A	10.2 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.63	LOS B	0.70	LOS B	Yes
UVP/Orcutt Road	0.47	LOS A	0.64	LOS B	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.3 sec.</b>	<b>LOS D</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.51	LOS A	0.54	LOS A	Yes
UVP/US 101 SB Ramps (a)	15.0 sec.	LOS B	16.6 sec.	LOS C	Yes
UVP/US 101 NB Ramps(a)	9.4 sec.	LOS A	9.5 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

Clark Ave. intersections have been ignored and are within the sphere of a reasonable analysis. Clark/135 ramps and Clark Bradley should be included as well as Bradley/Foster, Bradley/Lakeview and Bradley/Santa Maria Way.



The data presented in Tables 8 and 9 indicate that the UVP/Hummel Drive intersection is forecast to operate in the LOS F range during the AM and PM peak hours with the addition of Project traffic, which exceeds the County's LOS C standard. The remaining intersections are forecast to operate in the LOS A-C range during the AM and PM peak hours with Existing + Project traffic, which meet the City's LOS D operating standard and the County's LOS C - D operating standard. Improvements for the UVP/Hummel Drive intersection are presented in the Recommended Improvements section of this report.

## CUMULATIVE CONDITIONS

### Cumulative Traffic Volumes

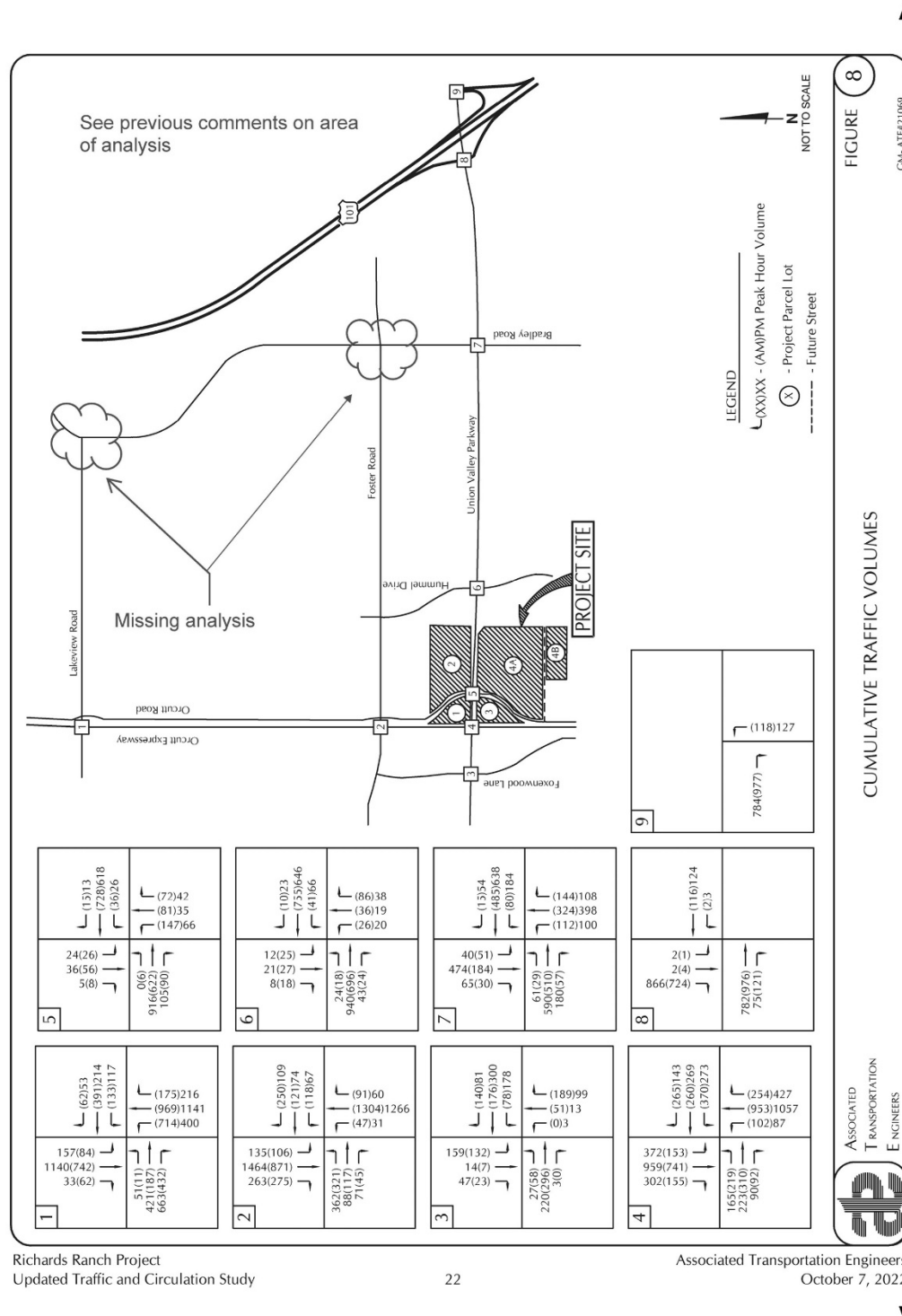
Cumulative traffic volumes were forecast for the study-area intersections assuming development of the approved and pending projects located in the adjacent portions of the City and the County (list of cumulative projects is contained in the Technical Appendix). Trip generation estimates were developed for the cumulative projects using ITE rates or from traffic studies prepared for the cumulative projects (cumulative trip generation calculations are contained in the Technical Appendix). The traffic generated by the Santa Maria Airport Business Park Rezone Project was included in cumulative traffic forecasts. It is noted that the SEIR prepared for this project required that the traffic signals be installed at the UVP/Foxenwood Lane intersection; this improvement is therefore included in the cumulative analysis. It is also noted that Santa Barbara County approved an amendment to the Orcutt Community Plan to provide a local road connection between the UVP/US 101 interchange and the adjoining frontage road on the east side of US 101. This Project is not scheduled or funded at this time and thus is not included in the Cumulative analysis.

Traffic generated by the cumulative projects was then added to the Existing volumes to produce the Cumulative traffic forecasts. Figure 8 shows the Cumulative traffic volumes and Figure 9 shows the Cumulative + Project volumes.

### Cumulative Intersection Operations

Levels of service were calculated for the study-area intersections assuming the Cumulative and Cumulative + Project traffic volumes presented on Figures 8 and 9. Tables 10 and 11 compare the Cumulative and Cumulative + Project levels of service forecasts and identify the Project's consistency with the City's LOS D standard and the County's LOS C - D standard.

SBPWT-32  
(cont'd)



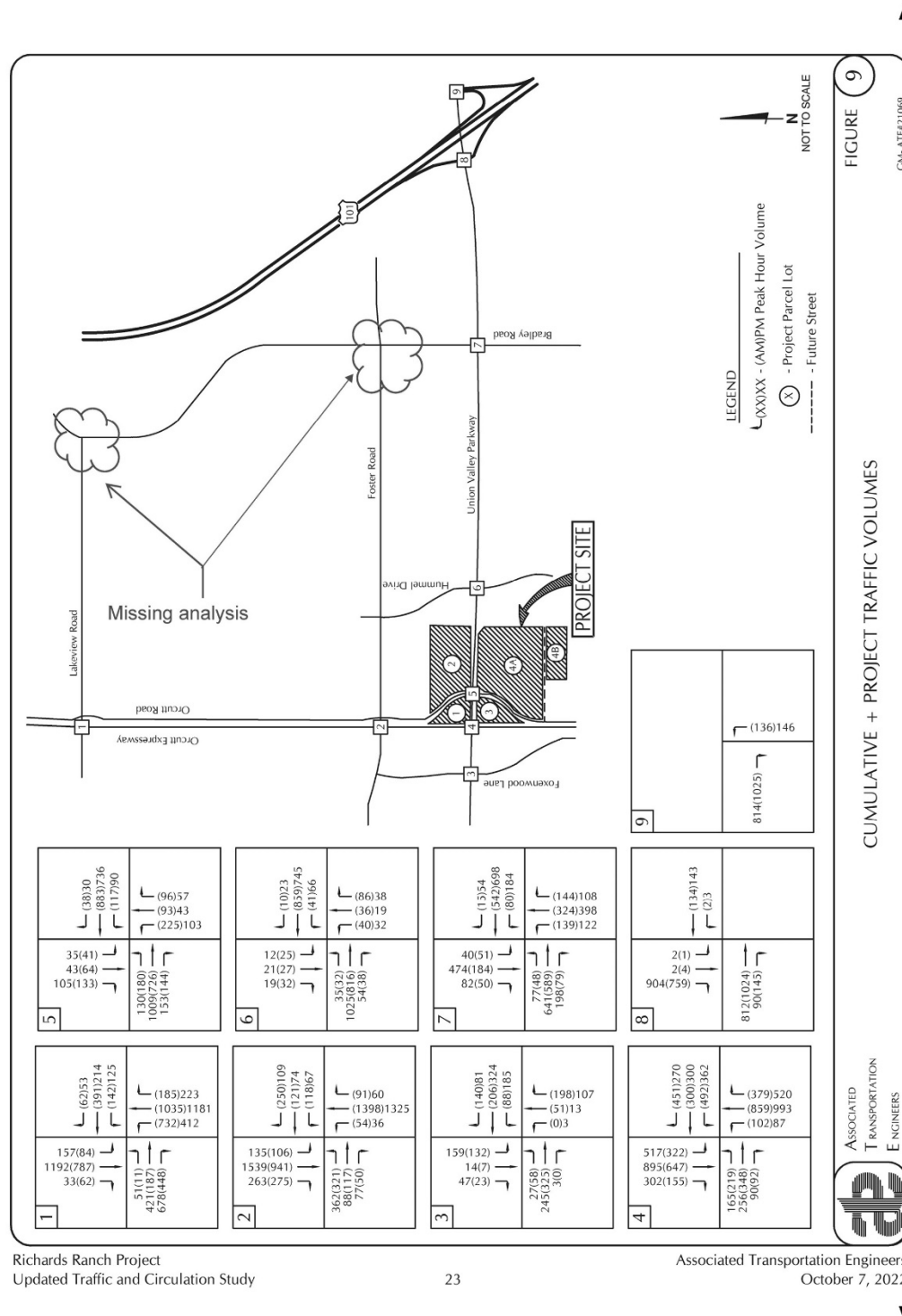


Table 10  
Cumulative + Project Levels of Service – AM Peak Hour

Intersection	Cumulative		Cumulative + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.70	LOS B	0.72	LOS C	Yes
Orcutt Expressway /Foster Rd	0.78	LOS C	0.81	LOS D	Yes
UVP/Foxenwood Ln (a)	0.48	LOS A	0.50	LOS A	Yes
UVP/ Orcutt Expressway	0.66	LOS B	0.73	LOS C	Yes
UVP/Orcutt Road	0.48	LOS A	0.77	LOS C	Yes
<b>UVP/Hummel Drive (b)</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.42	LOS A	0.47	LOS A	Yes
UVP/US 101 SB Ramps (b)	13.8 sec.	LOS B	14.8 sec.	LOS B	Yes
UVP/US 101 NB Ramps(b)	9.4 sec.	LOS A	9.5 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

- (a) Cumulative analysis assumes installation of traffic signals by Airport Business Park Specific Plan.  
(b) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

Table 11  
Cumulative + Project Levels of Service – PM Peak Hour

Intersection	Cumulative		Cumulative + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.79	LOS C	0.81	LOS D	Yes
Orcutt Expressway /Foster Rd	0.75	LOS C	0.77	LOS C	Yes
UVP/Foxenwood Ln (a)	0.45	LOS A	0.47	LOS A	Yes
UVP/ Orcutt Expressway	0.70	LOS B	0.78	LOS C	Yes
UVP/Orcutt Road	0.50	LOS A	0.68	LOS B	Yes
<b>UVP/Hummel Drive (b)</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.67	LOS A	0.61	LOS B	Yes
UVP/US 101 SB Ramps (b)	16.6 sec.	LOS C	18.7 sec.	LOS C	Yes
UVP/US 101 NB Ramps(b)	9.5 sec.	LOS A	9.6 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

- (a) Cumulative analysis assumes installation of traffic signals by Airport Business Park Specific Plan.  
(b) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

SBPWT-32  
(cont'd)



As shown in Tables 10 and 11, the UVP/Hummel Drive intersection is forecast to operate in the LOS F range during the AM and PM peak hours with and without the addition of Project traffic, which exceeds the County's LOS C - D standard. The Orcutt Expressway/Lakeview Road intersection is forecast to operate in the LOS D range, which is considered acceptable for this location in OCP Policy CIRC-O-3 (see Transportation Policy Standards section). The remaining intersections are forecast to operate in the LOS A-C range during the AM and PM peak hours with Cumulative + Project traffic, which meet the City's LOS D operating standard and the County's LOS C - D operating standard. Improvements for the UVP/Hummel Drive intersection are presented in the Recommended Improvements section of this report.

#### County Roadway Segment Operations

The Project is an annexation to the City of Santa Maria, thus the City's Circulation Element policies will be the applicable standards to assess the transportation aspects of the Project.

With respect to the Orcutt Community Plan, the roadway policy applicable to the UVP states that:

"For Primary roadway segments where the Estimated Future Volume exceeds the Acceptable Capacity, a project is considered consistent with this section of the Community Plan if: 1) intersections affected by traffic assigned from the project operate at or above minimum level of service standards, or 2) if the project provides a contribution toward an alternative transportation project (as identified in the OTIP) that is deemed to offset the effects of project-generated traffic."

The LOS analysis presented previously in the report shows that the intersections along the UVP from SR 135 to US 101, including Hummel Drive and Bradley Road, are forecast to operate in the LOS A - C range (assumes installation of signals at UVP/Hummel Drive intersection). The Project would therefore be consistent with the County's policies.

#### SITE ACCESS AND CIRCULATION

This is not a consistent analysis in line Santa Barbara County roadway segment analysis procedures. Please update and analyze each County segment for consistency.

No detailed access plans were developed for the preliminary site plan that was submitted for review. An access and circulation analysis were therefore completed for each parcel, as reviewed review below. It is noted that the design and location of bus turnouts, non-motorized access elements, bike lanes, internal access designs, frontage improvements, streetlights, etc. will be addressed in more detail during the development review stage of the Project. The improvements will conform to City standards.

SBPWT-32  
(cont'd)

#### Parcel 1 Access and Circulation

This parcel is located on the northwest corner of the UVP/Orcutt Road intersection and would contain a gas station with a convenience mart and an auto lube facility. As shown on the retail site plan (see Figure 2a), access to this parcel is proposed via a driveway on the west side of Orcutt Road that would be aligned with a new driveway on the east side of Orcutt Road that would provide access to Parcel 2. Figure 10 shows the access improvements that should be considered for Parcel 1, which are reviewed below.

1. Frontage improvements should be implemented on the west side of Orcutt Road including curb, gutter, and sidewalk consistent with the improvements that have been implemented on the east side of the roadway.
2. The driveway for Parcel 1 should be aligned with the driveway proposed for Parcel 2 on the east side of the roadway.
3. Orcutt Road should be widened to provide northbound and southbound left-turn lanes at the new driveway intersection.
4. The driveway approaches should be controlled by stop signs.
5. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed a convenience mart.

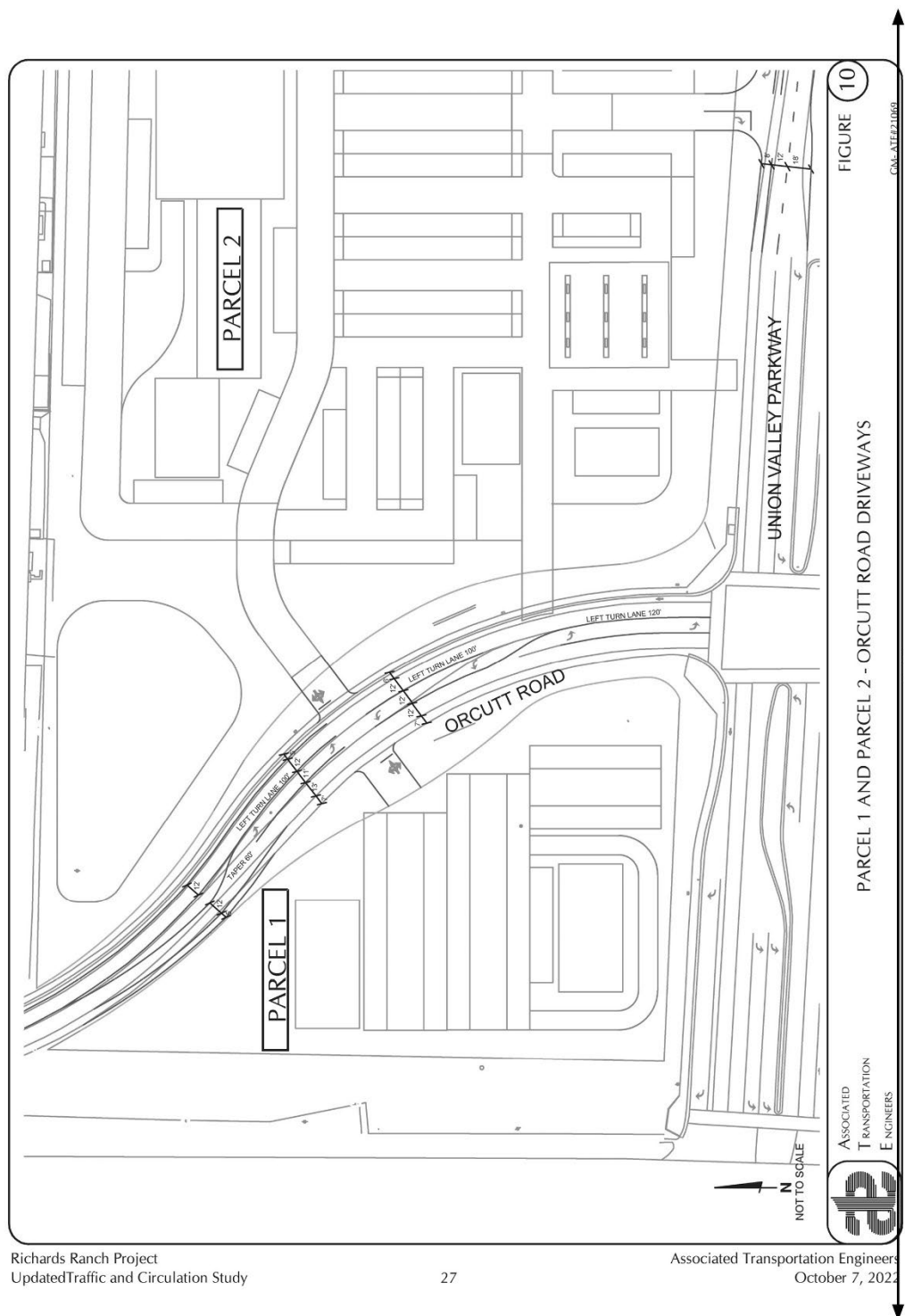
#### Parcel 2 Access and Circulation

This parcel is located on the north side of the UVP east of Orcutt Road and would contain 8 restaurant buildings, a neighborhood retail center, and a mini-storage facility. As shown on the retail site plan (see Figure 2a), access to the site is proposed via one driveway on the east side of Orcutt Road and two driveways on the north side of the UVP. Figures 10 and 11 show the access improvements that should be considered for Parcel 2, which are reviewed below.

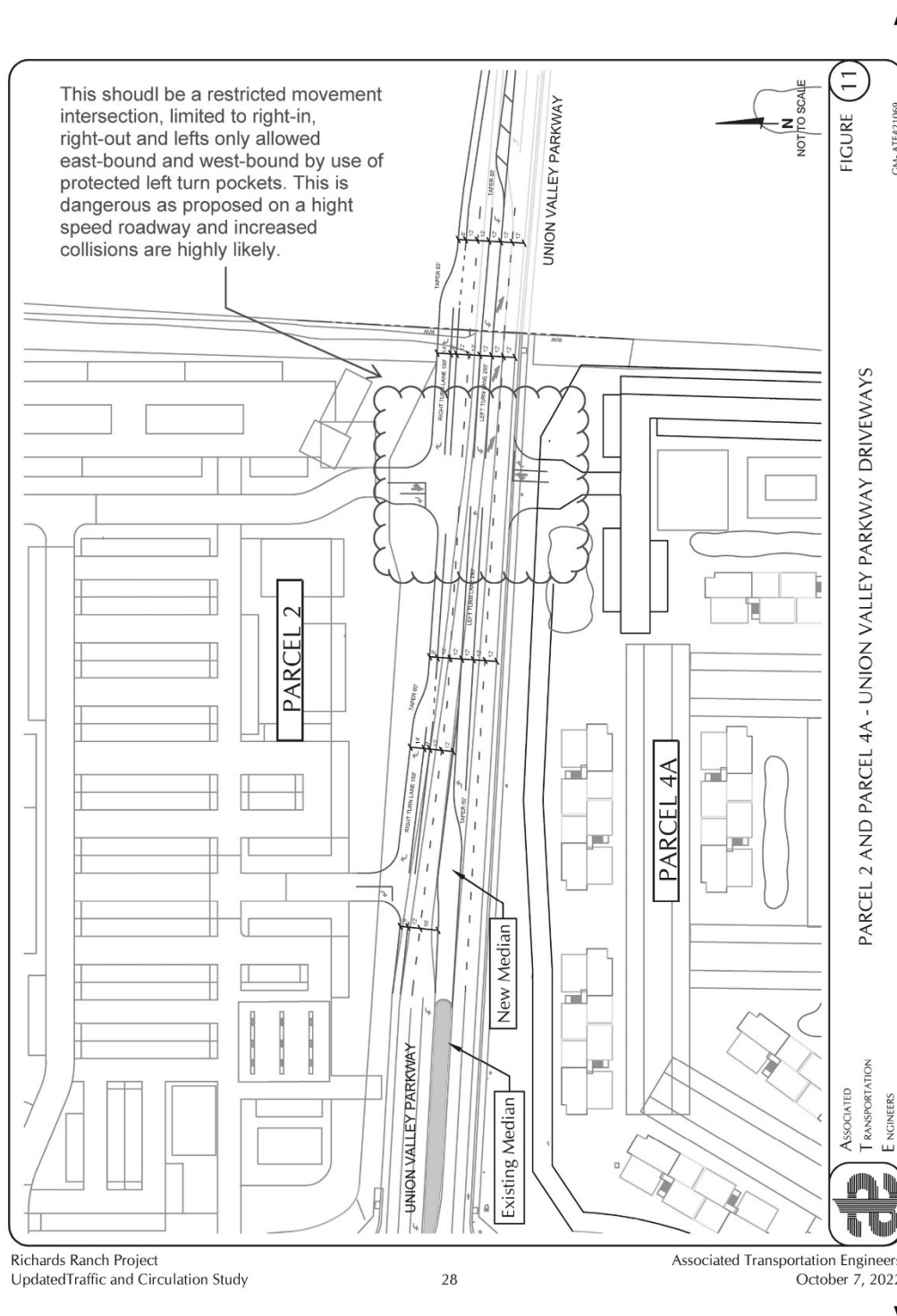
##### Orcutt Road

1. The driveway for Parcel 2 should be aligned with the driveway proposed for Parcel 1 on the west side of the roadway.
2. Northbound and southbound left-turn lanes should be provided on Orcutt Road at the new driveway intersection.
3. The driveway approaches at the intersection should be controlled by stop signs.
4. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed retail buildings.

SBPWT-32  
(cont'd)



SBPWT-32  
 (cont'd)



Richards Ranch Project  
 Updated Traffic and Circulation Study

28

Associated Transportation Engineers  
 October 7, 2022

UVP

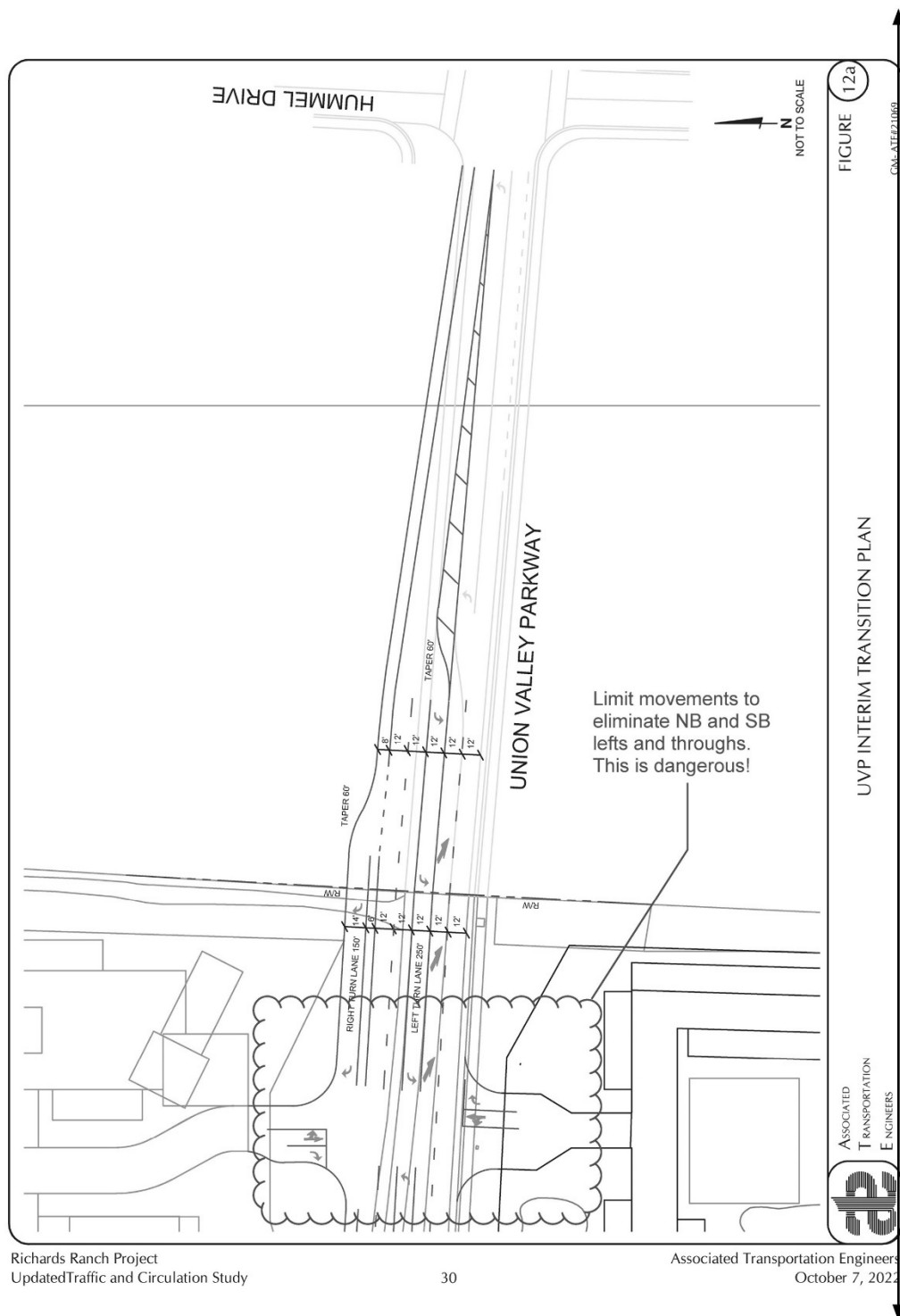
- NO! Dangerous!
1. Frontage improvements should be implemented on the north side of the UVP including curb, gutter, and sidewalk, consistent with the improvements that have been implemented on the south side of the UVP.
  2. The westerly driveway for Parcel 2 should be restricted to right-turns in/right-turns out with the easterly extension of the existing median on the UVP. A westbound right-turn lane should be provided at the driveway.
  3. The easterly driveway for Parcel 2 should be aligned with the driveway proposed for Parcel 4A on the south side of the UVP. A westbound right-turn lane should be provided at the driveway.
  4. Eastbound and westbound left-turn lanes should be provided on the UVP at the new easterly driveways.
  5. The easterly driveway should be configured with a through-left-turn lane and a right-turn lane.
  6. The driveway approaches at the intersection should be controlled by stop signs.
  7. Adequate vehicle storage should be provided in the proposed drive-through lanes.
  8. Pedestrian connections should be provided between the sidewalks on the UVP and the proposed retail buildings.

Implementation of the proposed frontage improvements on the north side of the UVP will require a transition to the two-lane section of the UVP west of the site and the UVP/Hummel Drive intersection. The interim transition plan, shown on Figure 12a, would transition the UVP back to a two-lane section on the east side of the UVP/Hummel Drive intersection. The long-term transition plan shown on Figure 12b, would provide full width improvements along the UVP through the Hummel Drive intersection and then transition back to the 2-lane section west of the intersection.

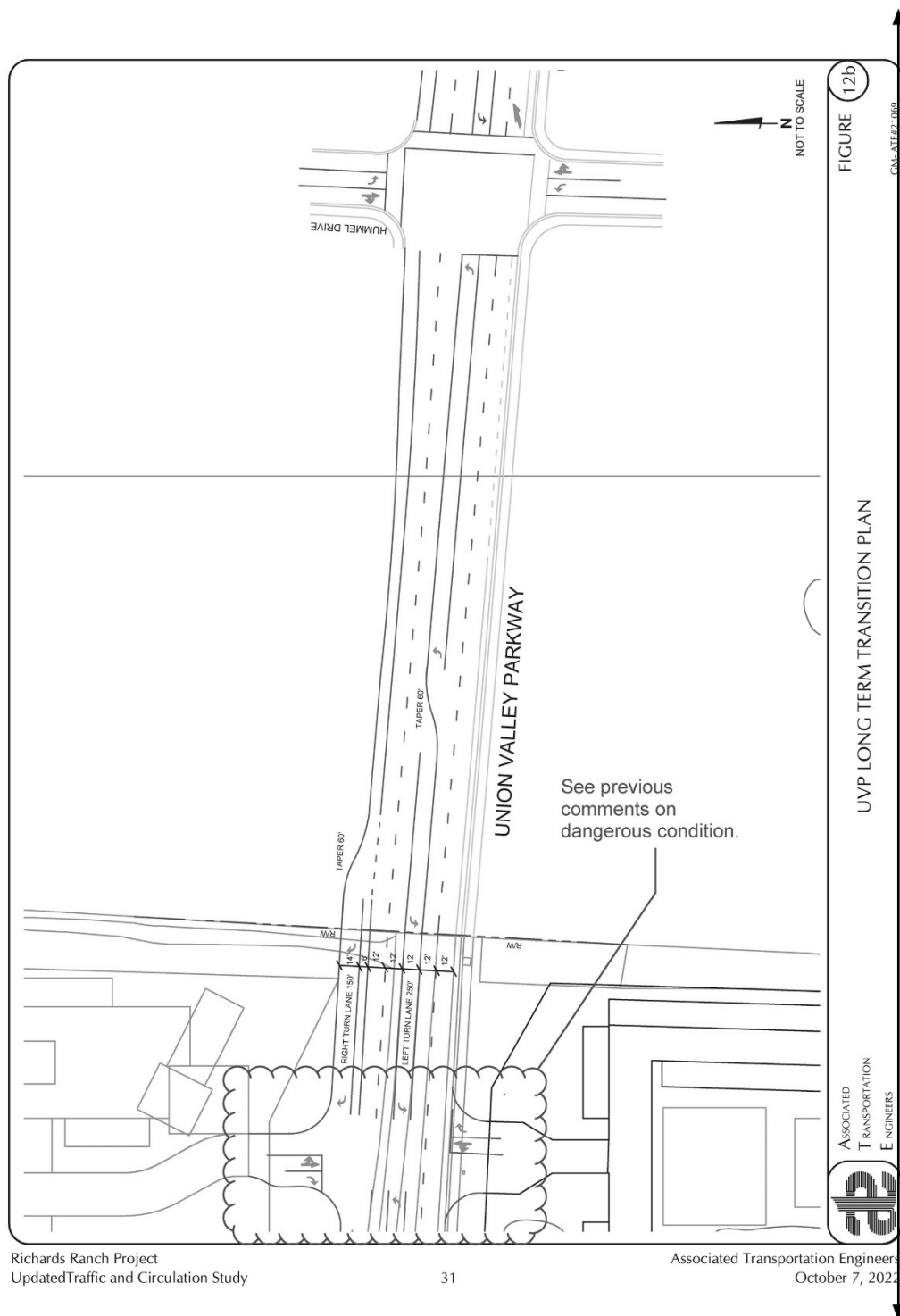
**Parcel 3 Access and Circulation**

This parcel is located on the southwest corner of the UVP/Orcutt Road intersection and would contain a restaurant with a drive-thru lane and an automated carwash. As shown on the retail site plan, access to this parcel is proposed via two driveways on the west side of Orcutt Road. Figure 13 shows the access improvements that should be considered for Parcel 3, which are reviewed below.

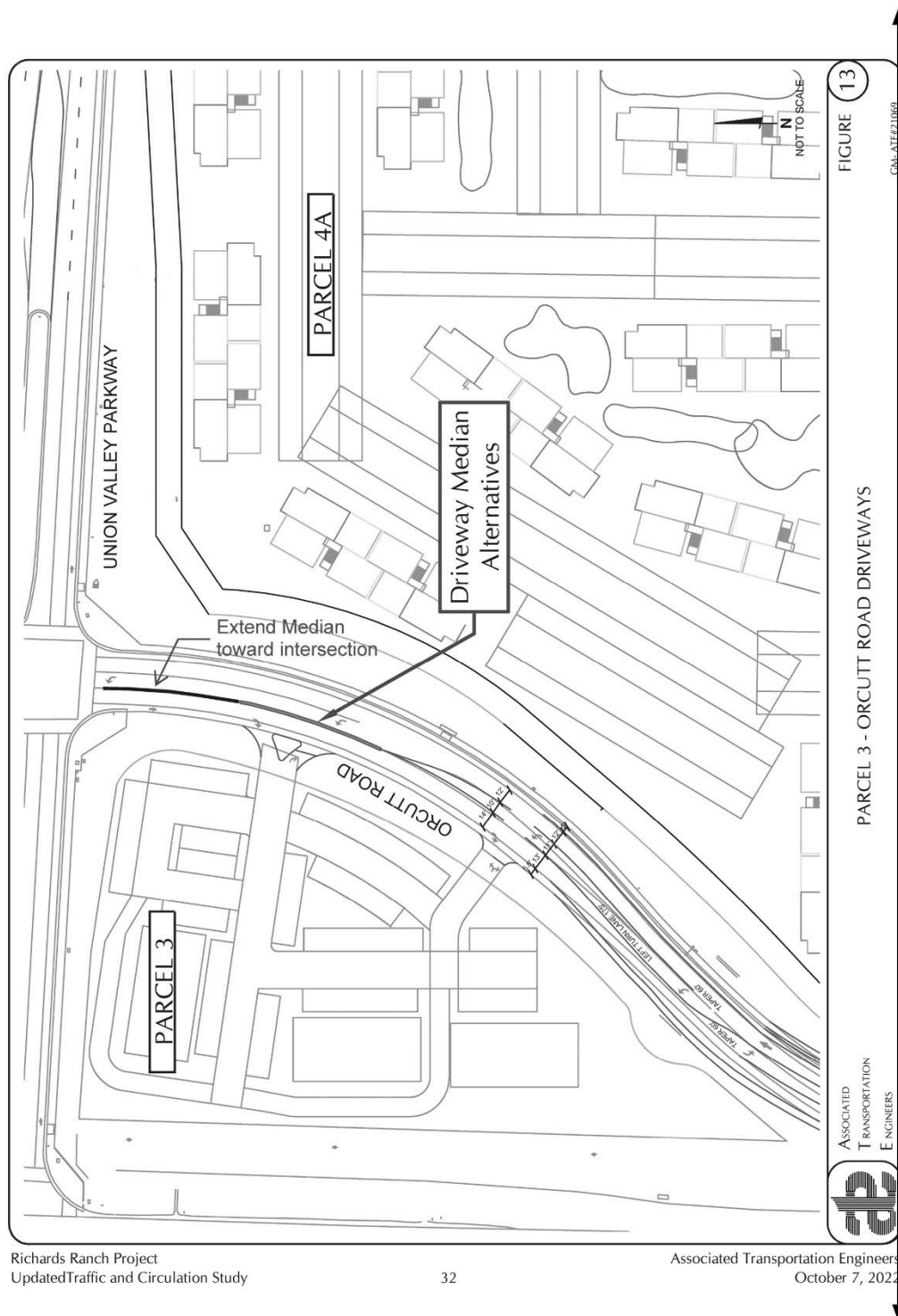
1. Frontage improvements should be implemented on the west side of Orcutt Road including curb, gutter, and sidewalk, consistent with the improvements that have been implemented on the east side of the roadway.
2. The northerly driveway would be designed with a median island treatment to limit movements to right-turn in/right-turn out (two options shown).
3. Orcutt Road should be widened to provide a northbound left-turn lane at the southerly driveway intersection.
4. The driveway approaches should be controlled by stop signs.
5. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed restaurant.



SBPWT-32  
(cont'd)



SBPWT-32  
(cont'd)





#### Parcel 4A Access and Circulation

This parcel is located on the south side of the UVP east of Orcutt Road and would contain 400 apartments. As shown on the residential site plan (see Figure 2b), access to the site is proposed via a driveway on the UVP and a connection to a new east-west access road that would extend easterly from Orcutt Road between Parcels 4A and 4B. Figure 14 shows the access improvements that should be considered for Parcel 4A, which are reviewed below.

##### UVP

1. The driveway for Parcel 4A should be aligned with the easterly driveway for Parcel 2 on the north side of the UVP.
2. Eastbound and westbound left-turn lanes should be provided on the UVP at the new easterly driveways
3. The driveway should be configured with a through-left-turn lane and a right-turn lane.
4. The driveway approaches at the intersection should be controlled by stop signs.
5. Pedestrian connections should be provided between the sidewalks on the UVP and the proposed apartment buildings

##### Orcutt Road

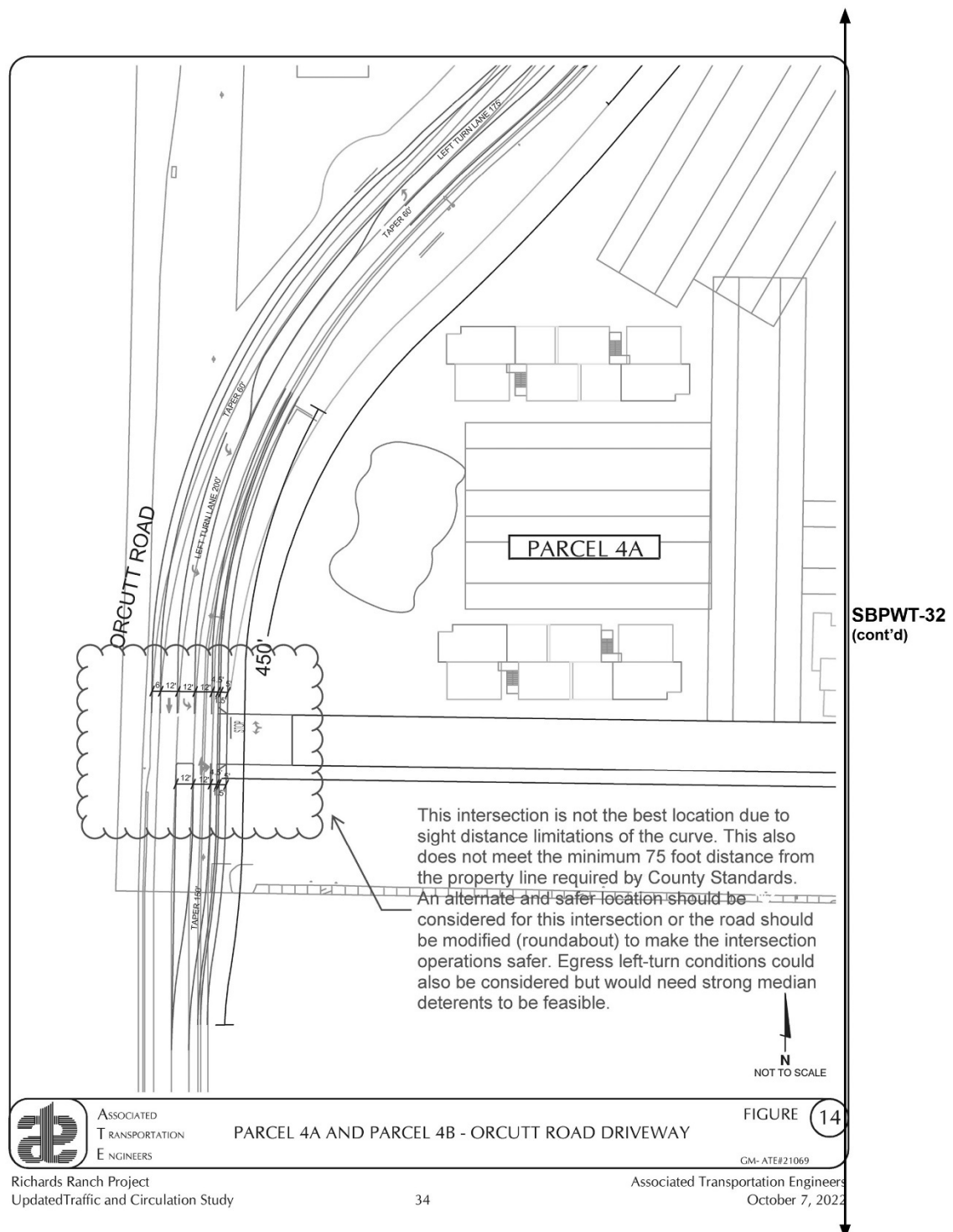
1. Orcutt Road should be widened north and south of the driveway to provide a southbound left-turn lane at the new roadway connection.
2. The new roadway approach should be controlled by stop signs.
3. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed apartment buildings.

#### Parcel 4B Access and Circulation

This parcel is located south of Parcel 4A and east of the Gloria Dei Lutheran Church on Orcutt Road. Parcel 4B would contain 95 townhome units. As shown on residential site plan (see Figure 2b) access to the site is proposed via a new east-west access road that would extend easterly from Orcutt Road between Parcels 4A and 4B. Secondary access would be provided through the internal road system in the adjacent Parcel 4A which provides access to the UVP. Figure 14 shows the access improvements that should be considered for Parcel 4B, which are reviewed below.

1. Orcutt Road should be widened north and south of the driveway to provide a southbound left-turn lane at the new roadway connection.
2. The new roadway approach should be controlled by stop signs.
3. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed apartment buildings.

SBPWT-32  
(cont'd)



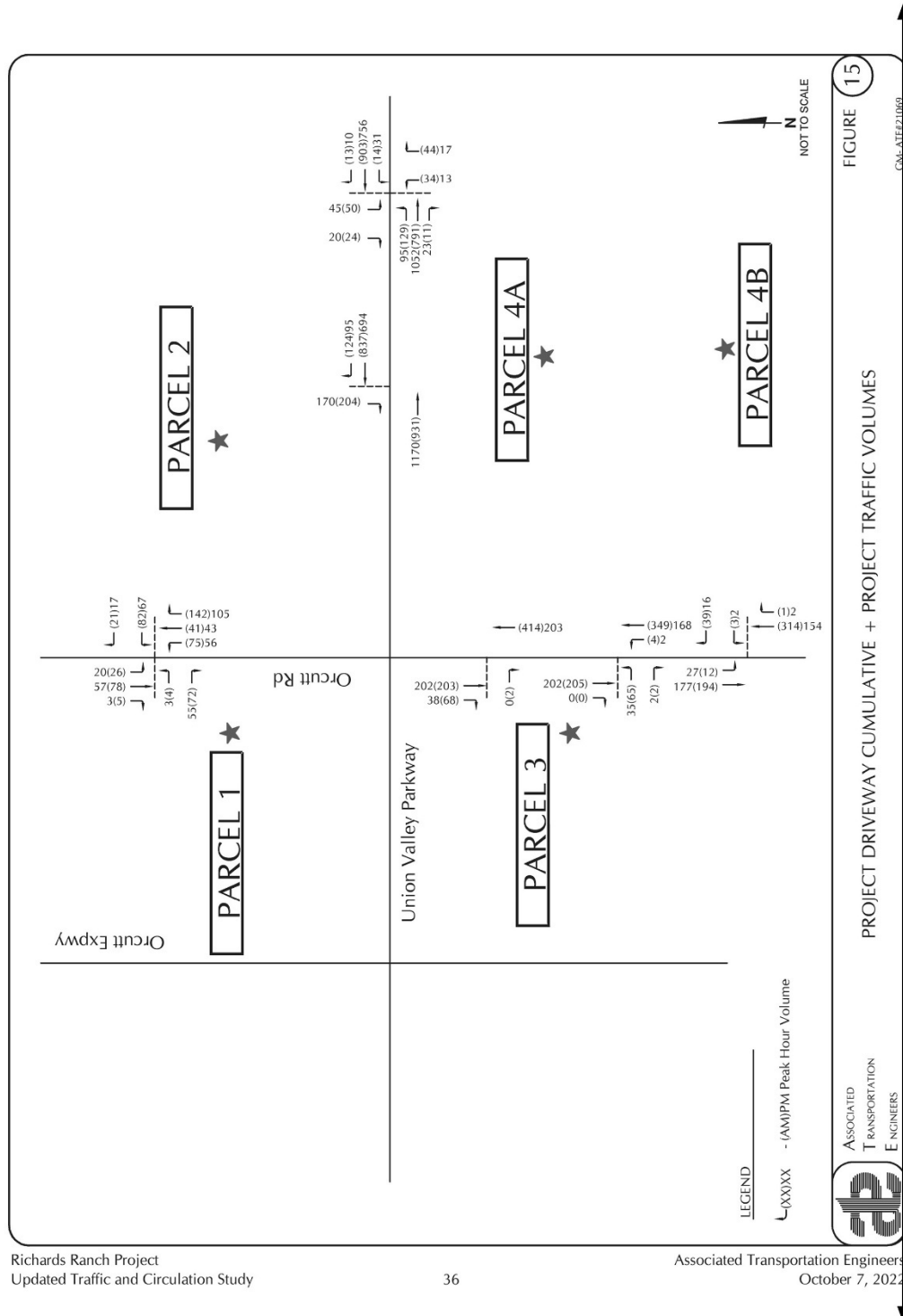
### Driveway Operations

Levels of service were calculated for the Project's driveways using the methodology outlined in the Highway Capacity Manual for 2-way stop-sign controlled intersections. Levels of service were calculated for the project driveways assuming the Cumulative + Project traffic volumes presented on Figure 15 (level of service calculations are contained in the Technical Appendix). Tables 12 and 13 present the Cumulative + Project levels of service for the project driveway intersections and identify locations that are forecast to exceed the City's LOS D standard and the County's LOS C – D standard.

**Table 12**  
**AM Peak Hour Project Driveway Operations - Cumulative + Project Conditions**

Intersection	Delay / LOS	Consistent?
	Cumulative + Project	
Orcutt Road/Parcel 1&2 Driveways EB Parcel 1 Driveway Left + Thru + Right WB Parcel 2 Driveway Left + Thru + Right SB Orcutt Road Left NB Orcutt Road Left Average Weighted Delay	9.1 Sec./LOS A 12.3 Sec./LOS B 7.6 Sec./LOS A 7.5 Sec./LOS A 9.7 Sec./LOS A	Yes
Union Valley Parkway/Parcel 2 Easterly & Parcel 4 Driveways EB Union Valley Parkway Left WB Union Valley Parkway Left SB Parcel 2 Easterly Driveway Left and Right NB Parcel 4 Driveway Left and Right Average Weighted Delay	10.9 Sec./LOS B 9.5 Sec./LOS A 29.5 Sec./LOS D 23.1 Sec./LOS C 18.7 Sec./LOS C	Yes
Union Valley Parkway/Parcel 2 Westerly Driveway SB Parcel 2 Westerly Driveway Right	14.5 Sec./ LOS B	Yes
Orcutt Road/Parcel 3 Northerly Driveway EB Parcel 3 Northerly Driveway Right	9.5 Sec./LOS A	Yes
Orcutt Road/Parcel 3 Southerly Driveway EB Parcel 3 Southerly Driveway Left + Right NB Orcutt Road Left Average Weighted Delay	12.2 Sec./LOS B 7.7 Sec./LOS A 11.2 Sec./LOS B	Yes
Orcutt Road/Parcel 5 Driveway WB Parcel 5 Driveway Left + Right SB Orcutt Road Left Average Weighted Delay	10.4 Sec./LOS B 7.9 Sec./LOS A 9.8 Sec./LOS A	Yes

SBPWT-32  
(cont'd)



**Table 13**  
**PM Peak Hour Project Driveway Operations - Cumulative + Project Conditions**

Intersection	Delay / LOS	Consistent?
	Cumulative + Project	
Orcutt Road/Parcel 1&2 Driveways EB Parcel 1 Driveway Left + Thru + Right WB Parcel 2 Driveway Left + Thru + Right SB Orcutt Road Left NB Orcutt Road Left Average Weighted Delay	8.9 Sec./LOS A 11.2 Sec./LOS B 7.6 Sec./LOS A 7.4 Sec./LOS A 9.3 Sec./LOS A	Yes
Union Valley Parkway/Parcel 2 Easterly & Parcel 4 Driveways EB Union Valley Parkway Left WB Union Valley Parkway Left SB Parcel 2 Easterly Driveway Left and Right NB Parcel 4 Driveway Left and Right Average Weighted Delay	9.9 Sec./LOS A 10.9 Sec./LOS B 26.7 Sec./LOS D 23.6 Sec./LOS C 16.8 Sec./LOS C	Not consistent Yes
Union Valley Parkway/Parcel 2 Westerly Driveway SB Parcel 2 Westerly Driveway Right	12.5 Sec./ LOS B	Yes
Orcutt Road/Parcel 3 Northerly Driveway EB Parcel 3 Northerly Driveway Right	9.4 Sec./LOS A	Yes
Orcutt Road/Parcel 3 Southerly Driveway EB Parcel 3 Southerly Driveway Left + Right NB Orcutt Road Left Average Weighted Delay	10.6 Sec./LOS B 7.6 Sec./LOS A 10.4 Sec./LOS B	Yes
Orcutt Road/Parcel 5 Driveway WB Parcel 5 Driveway Left + Right SB Orcutt Road Left Average Weighted Delay	9.3 Sec./LOS A 7.6 Sec./LOS A 8.3 Sec./LOS A	Yes

As shown in Tables 12 and 13, the project driveway intersections are forecast to operate in the LOS A - C range under Cumulative + Project conditions during the AM and PM peak hours, which meet the City's LOS D standard and the County's LOS C – D standard.

City staff requested a queueing analysis for the Project driveways to determine the future vehicle queues. The analysis assumes the lane geometry shown in Figures 10 – 14. Tables 14 and 15 summarize the peak (95<sup>th</sup>) queue forecasts for the Project driveways.

If all operations are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed use project and volume reductions should not reflect such.

**SBPWT-32**  
**(cont'd)**

**Table 14**  
**AM Peak Hour Driveway Queues - Cumulative + Project Conditions**

Intersection	95 <sup>th</sup> Queue Length
	Cumulative + Project
Orcutt Road/Parcel 1&2 Driveways	
EB Parcel 1 Driveway Left+Thru+Right	1 Vehicle
WB Parcel 2 Driveway Left+Thru+Right	1 Vehicle
SB Orcutt Road Left	1 Vehicle
NB Orcutt Road Left	1 Vehicle
Union Valley Parkway/Parcel 2 Easterly & Parcel 4 Driveways	
EB Union Valley Parkway Left	1 Vehicle
WB Union Valley Parkway Left	1 Vehicle
SB Parcel 2 Easterly Driveway Left	1 Vehicle
SB Parcel 2 Easterly Driveway Right	1 Vehicle
NB Parcel 4 Driveway Left	1 Vehicle
NB Parcel 4 Driveway Right	1 Vehicle
Union Valley Parkway/Parcel 2 Westerly Driveway	
SB Parcel 2 Westerly Driveway Right	2 Vehicles
Orcutt Road/Parcel 3 Northerly Driveway	
EB Parcel 3 Northerly Driveway Right	0 Vehicle
Orcutt Road/Parcel 3 Southerly Driveway	
EB Parcel 3 Southerly Driveway Left+Right	1 Vehicle
NB Orcutt Road Left	0 Vehicle
Orcutt Road/Parcel 5 Driveway	
WB Parcel 5 Driveway Left+Right	1 Vehicle
SB Orcutt Road Left	0 Vehicle

This just doesn't even make sense. Due to the size of this project, this is just proof that the numbers in the trip generation are innacurate.

**SBPWT-32**  
**(cont'd)**

**Table 15**  
**PM Peak Hour Driveway Queues - Cumulative + Project Conditions**

Intersection	95 <sup>th</sup> Queue Length
	Cumulative + Project
Orcutt Road/Parcel 1&2 Driveways	
EB Parcel 1 Driveway Left+Thru+Right	1 Vehicle
WB Parcel 2 Driveway Left+Thru+Right	1 Vehicle
SB Orcutt Road Left	0 Vehicle
NB Orcutt Road Left	1 Vehicle
Union Valley Parkway/Parcel 2 Easterly & Parcel 4 Driveways	
EB Union Valley Parkway Left	1 Vehicle
WB Union Valley Parkway Left	1 Vehicle
SB Parcel 2 Easterly Driveway Left	1 Vehicle
SB Parcel 2 Easterly Driveway Right	1 Vehicle
NB Parcel 4 Driveway Left	1 Vehicle
NB Parcel 4 Driveway Right	1 Vehicle
Union Valley Parkway/Parcel 2 Westerly Driveway	
SB Parcel 2 Westerly Driveway Right	1 Vehicles
Orcutt Road/Parcel 3 Northerly Driveway	
EB Parcel 3 Northerly Driveway Right	0 Vehicle
Orcutt Road/Parcel 3 Southerly Driveway	
EB Parcel 3 Southerly Driveway Left+Right	1 Vehicle
NB Orcutt Road Left	0 Vehicle
Orcutt Road/Parcel 5 Driveway	
WB Parcel 5 Driveway Left+Right	1 Vehicle
SB Orcutt Road Left	1 Vehicle

This also does not make sense. The queueing analysis and trip generation need to be reviewed deeper because this doesn't pass the common sense threshold.

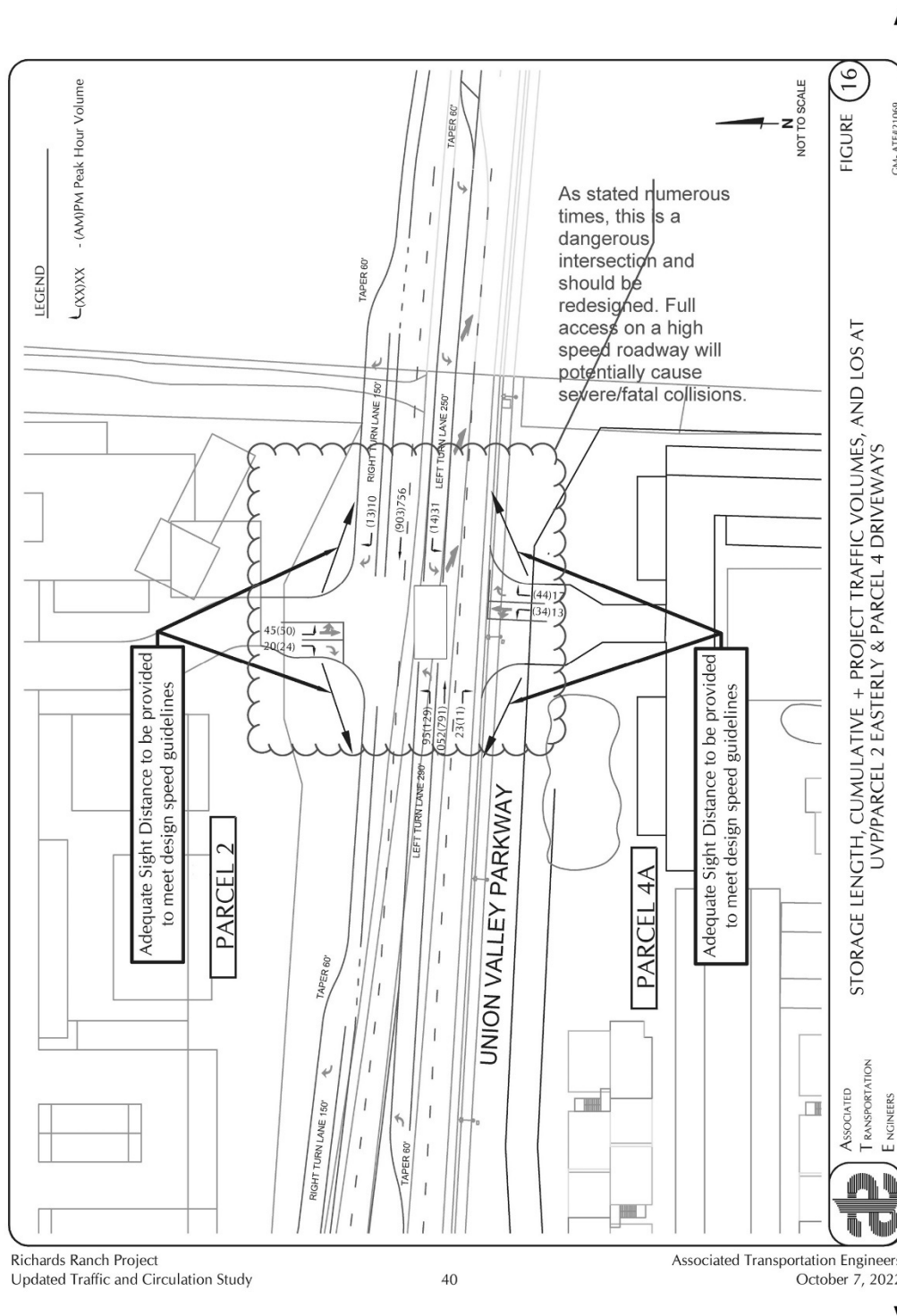
**SBPWT-32**  
(cont'd)

The data presented in Tables 14 and 15 show that all the approaching movements at the Project driveways are forecast to have less than 2 vehicles in queue.

#### UVP/Parcel 2 Easterly & Parcel 4 Driveways

As requested by City staff, the UVP/Parcel 2 Easterly & Parcel 4 Driveway intersection was analyzed. Figure 16 presents the storage length, Cumulative + Project traffic volumes, and LOS at this intersection. As shown, the driveways are forecast to operate in the LOS C range and there is adequate left-turn storage on UVP for the full access driveway. Sight distances at the driveways will be assessed in more detail during the development review stage of the Project to ensure that the minimum requirements meet the Caltrans minimum sight distance standard for the 50 MPH design speed on UVP (430 feet).

I understand that entitlements are not part of this review, but sight distance should be reviewed now so proper driveway locations can be identified and reviewed. Sight distance is a critical safety element in development review and postponing an accurate analysis is not helpful in a DEIR.



SBPWT-32  
(cont'd)



## UVP QUEUING ANALYSIS

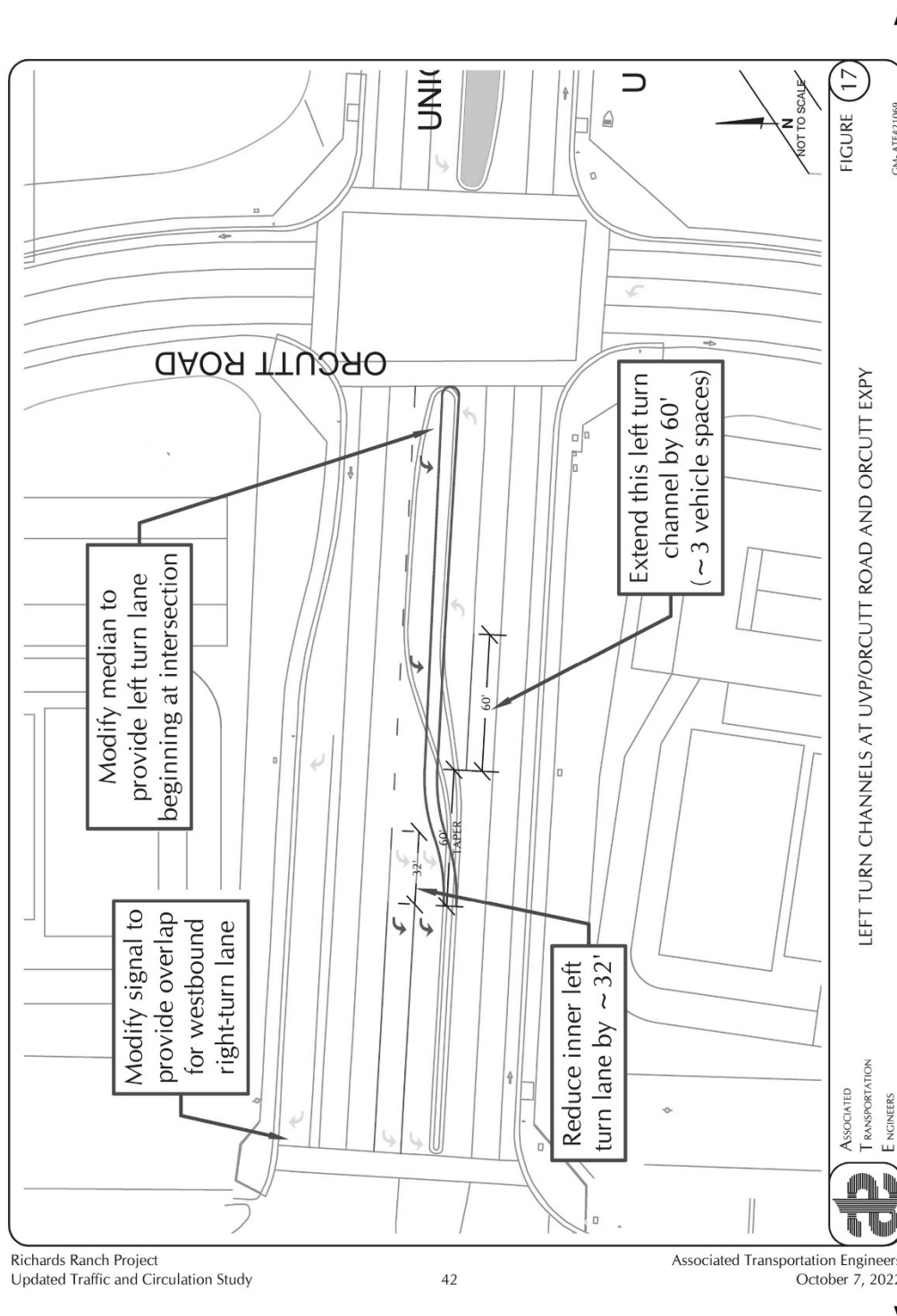
City staff and the peer review traffic consultant requested a queueing analysis for the UVP intersections adjacent to the Project site to determine if future vehicle queues will be accommodated in the available storage. The analysis assumes improvements to the median on UVP as shown in Figure 17. These median improvements increase the eastbound left-turn lane storage to 185 feet at the UVP/Orcutt Road intersection and the overall storage provided for the westbound dual left-turn lanes to 445 feet at the UVP/Orcutt Expressway intersection. The analysis also assumes a protected overlap westbound right-turn at the UVP/Orcutt Expressway intersection. The analysis reviews queue forecasts for the left-turn lanes and the adjacent through lanes under Cumulative + Project scenarios.

The queueing analysis was completed using the SYNCHRO software program. The SYNCHRO software implements the Highway Capacity Manual (HCM) operations methodology and predicts both "50th Percentile" and "95th Percentile" queue forecasts for the peak period. The 50th percentile queue forecasts represent the average queues during the peak period. The 95th percentile queue forecasts represent the peak queues during the peak period and are recommended for design purposes. Worksheets showing the queue forecasts are contained in the Technical Appendix. Tables 16 and 17 summarize the storage along with the average (50<sup>th</sup>) and peak (95<sup>th</sup>) queue forecasts for UVP intersections adjacent to the site.

**Table 16**  
**Cumulative + Project AM Peak Hour**  
**Storage Length and Left-Turn Queues and Storage Requirements**

Intersection	Storage Length	50 <sup>th</sup> % Queue	95 <sup>th</sup> % Queue
<u>UVP/Orcutt Expressway</u>			
• WB Left-Turn #1	445 Feet	124 Feet	207 Feet
• WB Left-Turn #2		130 Feet	188 Feet
• WB Through #1	335 Feet	73 Feet	113 Feet
• WB Through #2	335 Feet	65 Feet	140 Feet
• SB Left-Turn #1	615 Feet	142 Feet	211 Feet
• SB Left-Turn #2	615 Feet	174 Feet	231 Feet
<u>UVP/Orcutt Road</u>			
• EB Left-Turn	185 Feet	90 Feet	114 Feet
• EB Through #1	390 Feet	105 Feet	155 Feet
• EB Through #2	390 Feet	184 Feet	289 Feet
• WB Left-Turn	270 Feet	49 Feet	109 Feet
• NB Left-Turn	245 Feet	102 Feet	156 Feet
• SB Left-Turn	175 Feet	24 Feet	60 Feet

If all operations are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed use project and volume reductions should not reflect such.



If all operations are based on the reduced volumes assumed by this project being "mixed use", then the values in the table are not accurate. This is NOT a mixed use project and volume reductions should not reflect such.

**Table 17**  
**Cumulative + Project PM Peak Hour**  
**Storage Length and Left-Turn Queues and Storage Requirements**

Intersection	Storage Length	50 <sup>th</sup> % Queue	95 <sup>th</sup> % Queue
<u>UVP/Orcutt Expressway</u>			
• WB Left-Turn #1	445 Feet	96 Feet	155 Feet
• WB Left-Turn #2		95 Feet	121 Feet
• WB Through #1	335 Feet	53 Feet	120 Feet
• WB Through #2	335 Feet	59 Feet	110 Feet
• SB Left-Turn #1	615 Feet	204 Feet	314 Feet
• SB Left-Turn #2	615 Feet	246 Feet	339 Feet
<u>UVP/Orcutt Road</u>			
• EB Left-Turn	185 Feet	104 Feet	135 Feet
• EB Through #1	390 Feet	209 Feet	369 Feet
• EB Through #2	390 Feet	253 Feet	384 Feet
• WB Left-Turn	270 Feet	39 Feet	56 Feet
• NB Left-Turn	245 Feet	77 Feet	118 Feet
• SB Left-Turn	175 Feet	27 Feet	66 Feet

The data presented in Tables 16 and 17 indicate that all of the storage lengths at the intersections meet the 50<sup>th</sup> and 95<sup>th</sup> percentile queue forecasts with the proposed improvements of the median and the protected overlap movement.

#### ACCIDENT ANALYSIS

An accident analysis was completed to evaluate the accident rates at the key intersections within the UVP corridor adjacent to the Project site, which include UVP/Foxenwood Lane, UVP/Orcutt Expressway, UVP/Orcutt Road, UVP/Hummel Drive, and UVP/Bradley Road. Accident data was obtained from the City of Santa Maria for the most current 3-year period of accident records available (copy of 2018-2020 accident data is attached).

It is important to note that accident data is used as a screening tool to identify potential safety problems. The rate of accidents was calculated for each intersection and then compared to California statewide averages for similar facilities to identify potential safety issues. By nature, accident rates experienced on a facility are often higher than the statewide average rate for similar facilities since the statewide averages are comprised of lower-than-average rates + higher-than-average rates (lower + higher = average).

This should be updated with current data

**SBPWT-32**  
**(cont'd)**

If the accident rate experienced on a facility is higher than the statewide average, the Caltrans significance test is performed to determine if the number of accidents that occurred on the facility is statistically significant. If the number of accidents experienced is statistically significant, more detailed safety investigations are performed to determine if there are accident patterns that can be corrected by changing design features of the facility (e.g., widen traffic lanes, widen roadway shoulders, change roadway curvatures, add signs, install traffic signals, etc.).

Accident rates were calculated for each of the UVP intersections adjacent to the Project site using the 3-year accident histories. The "area of influence" for each intersection is defined as within 250 feet of the intersection. The rate of accidents was calculated and then compared to California statewide average for similar facilities. Table 18 lists the actual rate of accidents for the 3-year period and compares the rates to the California statewide averages for similar intersections (see attached accident rate calculations for more details).

**Table 18**  
**UVP Intersections - Accident Rates**

Location	# Accidents	Accident Rate(a)	Statewide Average Rate(a)
UVP Foxenwood Lane	1 Accident	0.12 per mev	0.24 per mev
UVP/Orcutt Expressway	12 Accidents	0.35 per mev	0.42 per mev
UVP/Orcutt Road	9 Accidents	0.53 per mev	0.42 per mev
UVP/Hummel Drive	5 Accidents	0.31 per mev	0.24 per mev
UVP/Bradley Road	4 Accidents	0.15 per mev	0.42 per mev

(a) Accident rates per million entering vehicles (mev).

UVP/Foxenwood Lane. As shown in Table 18, there was 1 accident at this intersection within the 3-year period. The rate of accidents was 0.12 accidents per million entering vehicles and the California statewide average for similar intersections is 0.24 accidents per million entering vehicles. Thus, the rate of accidents is below the statewide average and further investigation is not required.

UVP/Orcutt Expressway. As shown in Table 18, there were 12 accidents at this intersection within the 3-year period. The rate of accidents was 0.35 accidents per million entering vehicles and the California statewide average for similar intersections is 0.42 accidents per million entering vehicles. Thus, the rate of accidents is below the statewide average and further investigation is not required.

UVP/Orcutt Road. As shown in Table 18, there were 9 accidents at this intersection within the 3-year period. The rate of accidents was 0.53 accidents per million entering vehicles and the California statewide average for similar intersections is 0.42 accidents per million entering vehicles. Thus, the rate of accidents is slightly higher than the statewide average. The Caltrans significance test was performed to determine if the number of accidents that occurred is statistically significant (a worksheet showing the Caltrans formula and the significance test is included in the Technical Appendix). The results show that the number of accidents required to be statistically significant is 15 accidents within the 3-year period. The number of accidents that occurred during the 3-year period was 9, which is statistically insignificant. Thus, further investigation of the accident history is not warranted.

UVP/Hummel Drive. As shown in Table 18, there were 5 accidents at this intersection within the 3-year period. The rate of accidents was 0.31 accidents per million entering vehicles and the California statewide average for similar intersections is 0.24 accidents per million entering vehicles. Thus, the rate of accidents is slightly higher than the statewide average. The Caltrans significance test was performed to determine if the number of accidents that occurred is statistically significant (a worksheet showing the Caltrans formula and the significance test is included in the Technical Appendix). The results show that the number of accidents required to be statistically significant is 10 accidents within the 3-year period. The number of accidents that occurred during the 3-year period was 5, which is statistically insignificant. Thus, further investigation of the accident history is not warranted.

UVP/Bradley Road. As shown in Table 18, there were 4 accidents at this intersection within the 3-year period. The rate of accidents was 0.15 accidents per million entering vehicles and the California statewide average for similar intersections is 0.42 accidents per million entering vehicles. Thus, the rate of accidents is below the statewide average and further investigation is not required.

#### SIGNAL WARRANT ANALYSIS

As requested by City Staff, a signal warrant analysis was conducted at the UVP/Hummel Drive intersection. The California Manual on Uniform Traffic Control Devices (CA MUTCD) warrants were applied using Cumulative + Project volumes. The posted speed limit on UVP is 50 MPH, therefore the rural warrants were utilized (traffic signal warrant worksheets contained in the Technical Appendix).

The UVP/Hummel Drive intersection is STOP-sign controlled on the Hummel Drive approaches and free flow on the UVP approaches. As noted above, the signal warrant analysis was completed using the Existing and Cumulative + Project volumes. Table 19 presents the results of the traffic signal warrant analysis.

**Table 19**  
**Signal Warrant Analysis Results – UVP/Hummel Drive**

Scenario	Warrant #	Type	Warrant Satisfied?
Existing	3	Peak Hour Count and Cumulative Forecast	Yes
Cumulative + Project	3	Peak Hour Count and Cumulative Forecast	Yes

The data presented in Table 19 show that the existing volumes at the UVP/Hummel Drive intersection meet the Peak Hour warrant. It is also noted that the intersection currently operates at LOS D, which exceeds the County's LOS C policy. The data indicates that signals are required without the addition of the Project's traffic.

The data presented in Table 19 also show that the Cumulative + Project volumes at the intersection meet the Peak Hour warrant. The intersection is forecast to operate at LOS F under Cumulative + Project conditions further indicating that traffic signals should be considered for this location.

Why was no signal warrant analysis done for the main driveway along UVP? Seems like if Hummel meets the warrant the project driveway would too. Please explain.

## RECOMMENDED IMPROVEMENTS

The traffic analysis presented in Tables 8-11 found that the UVP/Hummel Drive intersection would operate in the LOS D - F range which exceeds the County's LOS C Standard. As noted previously, the intersection meets the Peak Hour warrant for the Existing and Cumulative + Project conditions. The following section review improvement measures that have been identified for the UVP/Hummel Drive intersection.

### UVP/Hummel Drive Intersection

County staff have indicated that the ultimate plan for the UVP adjacent to the Hummel Drive intersection is to widen UVP from two lanes to four lanes with left-turn channelization. This widening will occur west of Hummel Drive to match the four lanes in front of the Project site. In addition, County staff indicated that traffic signals may be installed at the UVP/Hummel Drive intersection in the future. Figure 18 provides a schematic illustration of the future intersection design with the widening. Table 20 presents the Existing + Project and Cumulative + Project levels of service forecasts for the intersection assuming implementation of the improvements.

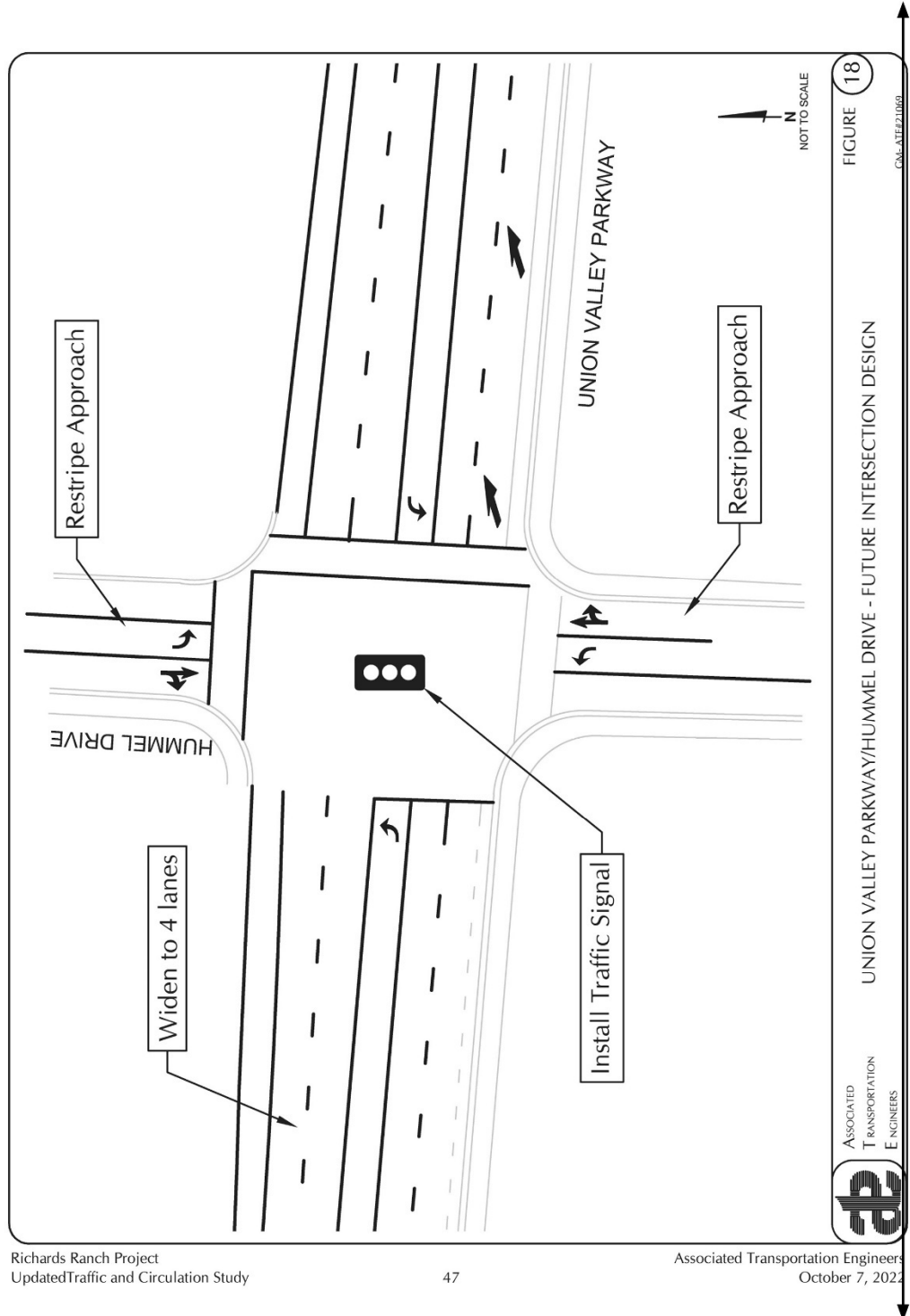
**Table 20**  
**Intersection Levels of Service With Improvements**

Intersection	Existing + Project		Cumulative + Project	
	Existing Geometry	With Improvements	Existing Geometry	With Improvements
UVP/Hummel Drive AM(a)	> 50.0 sec. / LOS F	0.47 / LOS A	> 50.0 sec / LOS F	0.49 / LOS A
UVP/Hummel Drive PM(a)	> 50.0 sec. / LOS F	0.49 / LOS A	> 50.0 sec / LOS F	0.52 / LOS A

(a) Assumes UVP widening and traffic signal installation.

The data presented in Table 20 show that with the planned improvements, the UVP/Hummel Drive intersection will operate in the LOS A range.

SBPWT-32  
(cont'd)



## VMT ANALYSIS

Per the State's Natural Resource Agency Updated Guidelines for the Implementation of the CEQA adopted in 2018, Vehicle Miles Traveled (VMT) has been designated as the most appropriate measure of transportation impacts. "Vehicle Miles Traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. For land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

The Governor's Office of Planning and Research (OPR) published a Technical Advisory on Transportation that includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures<sup>5</sup>. The Technical Advisory provides screening tools to determine when a project may have a significant VMT impacts. The City of Santa Maria's adopted Environmental Procedures and Guidelines manual contain thresholds and methodologies for assessing potential VMT impacts for Project located in the City.



This is not a mixed use development!

### Criteria For Mixed-Use Developments

The City's Environmental Procedures and Guidelines manual ("CEQA Guidelines") provides the following guidance for mixed-use projects:

"For mixed use projects, the CEQA Guidelines recommend either analyzing each component of the proposed project separately or focusing on the predominant land use."

Given that the residential portion of the Project accounts for approximately 29% of the primary trips generated at the site, each component of the Project is analyzed separately.

### VMT Analysis - Residential

The potential VMT impacts associated with the residential portion of the Project are reviewed below.

#### VMT Thresholds

Consistent with CEQA Guidelines Section 15064.7, Thresholds of Significance, the City of Santa Maria has adopted the countywide baseline average of home-based VMT per population for residential projects and thresholds set at 85% of these countywide baseline averages for determining whether a project's VMT will be significant. The thresholds will be periodically updated as necessary during normal updates of the model baseline (approximately every five years).

<sup>5</sup> Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, December 2018.



New residential projects (single family, multi-family, mobile home) are required to generate less than 6.17 VMT per person (one-way trip). Projects that exceed this threshold may have a significant effect on the environment and will require project revisions and/or mitigation measures may be implemented to reduce the impact to less than significant. Mitigation strategies would be specific to the particular project and could include introducing mixed-use components, alternative transportation opportunities, pedestrian and/or transit network improvements, and traffic calming measures.

#### *VMT Analysis*

City staff indicated that the City's VMT calculator was not available for the VMT analysis as the Project is currently located outside of the City limits. The City's CEQA Guidelines, however, contain screening maps to determine the VMT generation of residential projects located in different zones within the City and the adjacent County areas (screening map contained in the Technical Appendix). The screening map indicates that the residential portion of the Project would generate up to the countywide average home based VMT per population of 7.26. As discussed in the trip generation section of this report, there will be some internal trips that travel between the various parcels that comprise the site and would not generate new VMT. The internal capture trips include trip interactions between the residential uses and the adjacent commercial uses. The ITE mixed-use traffic model shows that up to 40% of the trips generated by the residential component of the Project would be internal to the site. To be conservative, the traffic study assumes that 25% of the Project-generated trips are internal. This 25% mixed-use factor was applied to the City's VMT screening map forecasts to determine if the Project would exceed the City's VMT impact thresholds. Table 21 presents the results of the analysis.

**SBPWT-32**  
(cont'd)

**Table 21**  
**Residential Component VMT Comparison to City Threshold**

City of Santa Maria Screening Map VMT Estimate	VMT Estimate with Mixed-Use Reduction	City of Santa Maria VMT Threshold	Potential Impact?
7.26 VMT Per Population	5.45 VMT per Population	6.17 VMT Per Capita	NO

This is not a mixed use development!

The data presented in Table 21 indicate that the residential component of the Project would generate 7.26 VMT per population (as shown on CEQA Guidelines screening map) which would exceed the City's threshold of 6.17 VMT per capita. With the mixed-use adjustments, the residential component VMT would be reduced to 5.45 VMT per population which would be below the City's impact threshold. This portion of the mixed-use project would therefore have a less than significant impact based on City thresholds.

#### VMT Analysis Mini-Storage

The potential VMT impacts associated with the mini-storage portion of the Project are reviewed below.

##### Screening Criteria

Consistent with the recommendations in the OPR Technical Advisory, Section 4.3.1 of the City of Santa Maria's CEQA Guidelines establishes screening criteria for certain projects that are exempt from performing a detailed VMT analysis and may be presumed to have a less than significant VMT impact. Section 4.3.1-A states that:

"The following discretionary development projects are not subject to VMT analysis:

3. Small discretionary projects that would generate or attract fewer than 110 daily trips (per CEQA)."

##### VMT Analysis

The mini-storage component of the Project consists of approximately 25,000 SF of development that is forecast to generate 36 ADT, which is less than the 110 ADT screening criteria. This component of the Project therefore satisfies the screening criteria for small discretionary projects and may be presumed to result in less than significant VMT impacts in accordance with the City of Santa Maria CEQA Guidelines.

#### VMT Analysis – Retail

The potential VMT impacts associated with the retail portion of the Project are reviewed below.

SBPWT-32  
(cont'd)

#### Screening Criteria

Consistent with the recommendations in the OPR Technical Advisory, Section 4.3.1 of the City of Santa Maria's CEQA Guidelines establishes screening criteria for certain projects that are exempt from performing a detailed VMT analysis and may be presumed to have a less than significant VMT impact. Section 4.3.1-A states that:

"The following discretionary development projects are not subject to VMT analysis:

1. A discretionary retail development project that is 50,000 square feet or less. Does not apply to regional shopping centers that predominately serve customers that live outside of the City limits.

The retail portion of the Project is greater than 50,000 SF thus a VMT analysis is required.

#### VMT Thresholds

The Governor's Office of Planning and Research (OPR) published a Technical Advisory on Transportation that includes recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The Technical Advisory provides the following guidance for analyzing mixed-use projects:

##### "Mixed-Use Projects

Lead agencies can evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g., residential and retail). Alternatively, a lead agency may consider only the project's dominant use. In the analysis of each use, *a project should take credit for internal capture*. Combining different land uses and applying one threshold to those land uses may result in an inaccurate impact assessment."

The City of Santa Maria has updated their Environmental Procedures and Guidelines manual to provide thresholds and methodologies for assessing potential VMT impacts for Project's located in the City. Pursuant to guidance set forth in CEQA Guidelines Section 15064.3, for retail development projects, redevelopment projects, medical development projects, and infrastructure projects that require a VMT analysis, the City has adopted "net change" in VMT as the applicable threshold for determining a significant impact (i.e., if the with-project VMT is greater than the without-project VMT).

SBPWT-32  
(cont'd)

#### VTM Modeling

DKS Associates was retained to prepare a VMT analysis for the retail portion of the Project using the SBCAG model. The SBCAG model is considered the most appropriate tool for the analysis given that the City of Santa Maria SB 743 thresholds were developed using the SBCAG 2010 baseline. The net VMT change associated with the retail portion of the Project was analyzed by comparing daily origin-destination VMT with and without the Project. It is noted that the baseline model was updated to include the residential portion of the Project in order to account for the internal capture of trips that would occur in the mixed-use development, as directed in the OPR Technical Advisory.

#### VTM Analysis Results

Table 22 presents the VMT results of the "Baseline" and "Baseline With Project" model runs and shows the net VMT change associated with the retail portion of the Project.

**Table 22**  
**Retail Component – Net Change in VMT**

Geography	Baseline VMT	Baseline With Retail VMT	Net VMT
Countywide (a)	11,051,821 (b)	11,008,518	-43,303

- (a) Includes trips to, from, and within Santa Barbara County.  
(b) Includes residential portion of the proposed project.

The data presented in Table 22 show that the retail portion of the Project would result in a net decrease of 43,303 VMT. Based on the City of Santa Maria's VMT thresholds, retail projects that result in a negative change in VMT indicate no VMT impacts. The results of the model analysis confirm the qualitative analysis contained in the ATE traffic study which concluded that the retail portion of the Project would result in a reduction in VMT due to the lack of retail services in the area and the mixed-use nature of the Project.

■ ■ ■

**SBPWT-32**  
**(cont'd)**

## REFERENCES AND PERSONS CONTACTED

### Associated Transportation Engineers

Scott A. Schell, Principal Transportation Planner  
Glenn Manaois, Transportation Engineer I  
Richard Pool, Principal Engineer  
Jiho Ha, Transportation Engineer II

### Persons Contacted

Mark Mueller, PE, City of Santa Maria  
Dana Eady, City of Santa Maria

### References

Santa Maria Airport Business Park Specific Plan Rezone Transportation Impact Study,  
Central Coast Transportation Consulting, October 2020.

Traffic Impact Study for the Ocrutt Community Plan General Plan Amendment Project,  
Psomas, May, 2020.

Highway Capacity Manual, Transportation Research Board, 6<sup>th</sup> Edition, 2016.

Trip Generation, Institute of Transportation Engineers, 11th Edition, 2021.

Assessing the Effects of a Dual-Service Left-Turn Phase, Turner, Hainen, Taylor, December  
2020.

Improving Intersection Performance with Left Turn Phase Reservice Strategies, Corey, Xin,  
Lao, Wang, 2012.

Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of  
Planning and Research, December 2018.

SBPWT-32  
(cont'd)

### 1.2.7.3.1 RESPONSE TO LETTER FROM COUNTY OF SANTA BARBARA PUBLIC WORKS DEPARTMENT, TRANSPORTATION DIVISION

Comment No.	Response																																										
SBPWT-1	<p>The comment introduces the SBPWT letter and indicates that the Traffic and Circulation Study is missing a buildout scenario. The commenter indicates that it is important to make sure the intersections would function properly once the Orcutt Community Plan (OCP) is built out and that new and existing intersections need to be evaluated with buildout numbers and if and if the proposed project needs to be appropriately included in the projected buildout volumes.</p> <p>The City has considered this comment and the overall SBPWT comment letter. Most comments in the SBPWT comment letter, including this one, do not affect the findings of the EIR transportation analyses, which is based primarily on VMT. It should also be noted that the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study. However, to support the Final EIR process, Associated Transportation Engineers (ATE) provided supplemental analyses to ensure that SBPWT's comments have been addressed for the record and to facilitate project consideration by the various agencies involved in deliberation of the project and the project decision-making process.</p> <p>Regarding consideration of the OCP, a supplemental trip generation analysis for the proposed Richards Ranch project shown in the conceptual site plan in the EIR has been prepared by ATE; the analysis was based on the conceptual site plan contained in EIR Chapter 2, Project Description. The supplemental analysis compares it against the anticipated development of the site through the OCP for Key Site 26 (the project site). As shown in Table SBPWT-1, the Richards Ranch project is forecast to generate 67 more PM peak hour trips than the anticipated development of the site under the OCP.</p> <table><tr><th colspan="6">Table SBPWT-1. Supplemental Analysis - Project vs OCP Trip Generation Net Difference</th></tr><tr><th>Land Use</th><th>Proposed Project</th><th>OCP</th><th>Net Difference</th><th>ADT</th><th>PM Peak Hour Trips</th></tr><tr><td>Residential (a)</td><td>495 DU</td><td>141 DU</td><td>+354 DU</td><td>+ 2,035</td><td>+120</td></tr><tr><td>Commercial (b)</td><td>94,696 SF</td><td>85,626 SF</td><td>+ 9,070 SF</td><td>+ 323</td><td>- 3</td></tr><tr><td>Office (c)</td><td>0 SF</td><td>30,000 SF</td><td>- 30,000 SF</td><td>- 383</td><td>- 55</td></tr><tr><td>Mini Storage (d)</td><td>39,500 SF</td><td>0 SF</td><td>+39,500 SF</td><td>+52</td><td>+5</td></tr><tr><td colspan="4">Net Totals</td><td>+ 2,027</td><td>+ 67</td></tr></table> <p>Source: ATE (2023; EIR Volume 2, Appendix A)</p> <p>Notes: ADT = average daily trips; DU = dwelling units; SF = square feet; ITE = Institute of Transportation Engineers. The commercial square footage presented in the Traffic and Circulation Study (Appendix E) and in EIR Volume 2, Appendix A are slightly different from the square footage described in EIR Chapter 2, Project Description. These differences are not substantial and would not result in changes in the environmental significance of impacts.</p> <p>(a) Trip generation based on ITE Code #220 (Multi-Family Housing – Low-Rise).</p> <p>(b) Trip generation based on ITE Code #821 (Shopping Plaza 40k-150k).</p> <p>(c) Trip generation based on ITE Code #710 (Office).</p> <p>(d) Trip generation based on ITE Code #151 (Mini-Warehouse).</p> <p>This analysis assumes a shopping center rate for all the commercial land uses of the project and the land use envisioned under the OCP to provide a consistent comparison. The analysis also assumes internal and pass-by factors for each scenario (internal factors of 1% to 17% and pass-by factors of 40%). Worksheets that provide the details of these calculations are provided in EIR Volume 2, Appendix A. The increase of 67 PM peak hour trips would not change the findings of the Traffic and Circulation Study. Refer to response to comment SBPWT-6 for more information regarding the net project added traffic to the additional intersections requested by the SBPWT. It is also noted that several of the key sites identified in the OCP have been developed with less intensity than originally anticipated in the OCP traffic analysis, thus offsetting the minor increases related to the project site.</p>	Table SBPWT-1. Supplemental Analysis - Project vs OCP Trip Generation Net Difference						Land Use	Proposed Project	OCP	Net Difference	ADT	PM Peak Hour Trips	Residential (a)	495 DU	141 DU	+354 DU	+ 2,035	+120	Commercial (b)	94,696 SF	85,626 SF	+ 9,070 SF	+ 323	- 3	Office (c)	0 SF	30,000 SF	- 30,000 SF	- 383	- 55	Mini Storage (d)	39,500 SF	0 SF	+39,500 SF	+52	+5	Net Totals				+ 2,027	+ 67
Table SBPWT-1. Supplemental Analysis - Project vs OCP Trip Generation Net Difference																																											
Land Use	Proposed Project	OCP	Net Difference	ADT	PM Peak Hour Trips																																						
Residential (a)	495 DU	141 DU	+354 DU	+ 2,035	+120																																						
Commercial (b)	94,696 SF	85,626 SF	+ 9,070 SF	+ 323	- 3																																						
Office (c)	0 SF	30,000 SF	- 30,000 SF	- 383	- 55																																						
Mini Storage (d)	39,500 SF	0 SF	+39,500 SF	+52	+5																																						
Net Totals				+ 2,027	+ 67																																						
SBPWT-2	<p>The comment refers to page 3 of the Traffic and Circulation Study and indicates that uncontrolled north-bound and south-bound left turns are not safe due to the high-speed nature of Union Valley Parkway (UVP). The comment further indicates that turns should be restricted.</p> <p>If they were to be approved, the proposed applications for annexation and a General Plan Amendment and Rezone would not result in development of the site immediately upon approval. For the annexation</p>																																										

Comment No.	Response																																																
	<p>proposed by the Applicant to occur, first, the City would approve an annexation resolution for the project, which would subsequently be submitted to SBLAFCO for approval as a Responsible Agency. If SBLAFCO were to approve the annexation, development of the project would require individual Planned Development Permit applications. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA. Because the development permits for the project are not yet being considered, the uncertainty in project timing, and that these factors do not affect the CEQA analysis or conclusions, the City will not be determining the exact internal circulation at this juncture.</p> <p>It should be noted that this comment and similar comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study. This is because the entitlement review process is not the project being considered at this time and details, such as internal circulation of the project, do not affect the findings of the CEQA process.</p> <p>The City, ATE, and the Applicant reviewed the design of the Parcel 2 and 4A driveways on UVP with City staff and the project team and determined that a median configuration should be implemented to allow left-turns in at both driveways with no left-turns out. Figure A in EIR Volume 2, Appendix A provides an illustration of the proposed median configuration. It is noted that the design provides adequate width to allow eastbound U-turns on UVP to accommodate movements to the project's main driveway. A supplemental analysis assuming no left-turns out and a peak hour factor of 0.92 instead of 1.00 has been provided (calculation worksheets provided in EIR Volume 2, Appendix A). The results are shown in Table SBPWT-2.</p> <p><b>Table SBPWT-2. Supplemental Analysis - LOS for UVP/Parcel 2 Easterly and Parcel 4 Driveways with Revised Median and Eastbound U-Turns</b></p> <table><tr><th rowspan="2">Intersection</th><th rowspan="2">Peak Hour</th><th colspan="2">Delay / LOS</th></tr><tr><th>Existing + Project</th><th>Cumulative + Project</th></tr><tr><td colspan="4">UVP/Parcel 2 Easterly &amp; Parcel 4 Driveways</td></tr><tr><td>EB Union Valley Parkway Left</td><td rowspan="4">AM</td><td>11.1 sec. / LOS B</td><td>12.0 sec. / LOS B</td></tr><tr><td>WB Union Valley Parkway Left</td><td>9.5 sec. / LOS A</td><td>9.8 sec. / LOS A</td></tr><tr><td>NB Parcel 4 Driveway Right</td><td>11.8 sec. / LOS B</td><td>12.2 sec. / LOS B</td></tr><tr><td>SB Parcel 2 Easterly Driveway Right</td><td>11.6 sec. / LOS B</td><td>12.3 sec. / LOS B</td></tr><tr><td>Average Weighted Delay</td><td></td><td>11.2 sec. / LOS B</td><td>11.9 sec. / LOS B</td></tr><tr><td colspan="4">UVP/Parcel 2 Easterly &amp; Parcel 4 Driveways</td></tr><tr><td>EB Union Valley Parkway Left</td><td rowspan="4">PM</td><td>10.1 sec. / LOS B</td><td>10.7 sec. / LOS B</td></tr><tr><td>WB Union Valley Parkway Left</td><td>11.1 sec. / LOS B</td><td>11.8 sec. / LOS B</td></tr><tr><td>NB Parcel 4 Driveway Right</td><td>13.0 sec. / LOS B</td><td>13.8 sec. / LOS B</td></tr><tr><td>SB Parcel 2 Easterly Driveway Right</td><td>11.1 sec. / LOS B</td><td>11.6 sec. / LOS B</td></tr><tr><td>Average Weighted Delay</td><td></td><td>10.8 sec. / LOS B</td><td>11.4 sec. / LOS B</td></tr></table> <p>Source: ATE (2023)</p> <p>Note: LOS = level of service; EB = eastbound; WB = westbound; NB = northbound; SB = southbound</p>	Intersection	Peak Hour	Delay / LOS		Existing + Project	Cumulative + Project	UVP/Parcel 2 Easterly & Parcel 4 Driveways				EB Union Valley Parkway Left	AM	11.1 sec. / LOS B	12.0 sec. / LOS B	WB Union Valley Parkway Left	9.5 sec. / LOS A	9.8 sec. / LOS A	NB Parcel 4 Driveway Right	11.8 sec. / LOS B	12.2 sec. / LOS B	SB Parcel 2 Easterly Driveway Right	11.6 sec. / LOS B	12.3 sec. / LOS B	Average Weighted Delay		11.2 sec. / LOS B	11.9 sec. / LOS B	UVP/Parcel 2 Easterly & Parcel 4 Driveways				EB Union Valley Parkway Left	PM	10.1 sec. / LOS B	10.7 sec. / LOS B	WB Union Valley Parkway Left	11.1 sec. / LOS B	11.8 sec. / LOS B	NB Parcel 4 Driveway Right	13.0 sec. / LOS B	13.8 sec. / LOS B	SB Parcel 2 Easterly Driveway Right	11.1 sec. / LOS B	11.6 sec. / LOS B	Average Weighted Delay		10.8 sec. / LOS B	11.4 sec. / LOS B
Intersection	Peak Hour			Delay / LOS																																													
		Existing + Project	Cumulative + Project																																														
UVP/Parcel 2 Easterly & Parcel 4 Driveways																																																	
EB Union Valley Parkway Left	AM	11.1 sec. / LOS B	12.0 sec. / LOS B																																														
WB Union Valley Parkway Left		9.5 sec. / LOS A	9.8 sec. / LOS A																																														
NB Parcel 4 Driveway Right		11.8 sec. / LOS B	12.2 sec. / LOS B																																														
SB Parcel 2 Easterly Driveway Right		11.6 sec. / LOS B	12.3 sec. / LOS B																																														
Average Weighted Delay		11.2 sec. / LOS B	11.9 sec. / LOS B																																														
UVP/Parcel 2 Easterly & Parcel 4 Driveways																																																	
EB Union Valley Parkway Left	PM	10.1 sec. / LOS B	10.7 sec. / LOS B																																														
WB Union Valley Parkway Left		11.1 sec. / LOS B	11.8 sec. / LOS B																																														
NB Parcel 4 Driveway Right		13.0 sec. / LOS B	13.8 sec. / LOS B																																														
SB Parcel 2 Easterly Driveway Right		11.1 sec. / LOS B	11.6 sec. / LOS B																																														
Average Weighted Delay		10.8 sec. / LOS B	11.4 sec. / LOS B																																														
SBPWT-3	<p>The comment refers to page 4 of the Traffic and Circulation Study and indicates that internal circulation should be improved to prevent dead end roadways.</p> <p>The City has considered this comment and agrees. However, it should be noted that the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study, as explained in response to comment SBPWT-2. In addition, it should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p>																																																
SBPWT-4	<p>The comment refers to page 4 of the Traffic and Circulation Study and notes that OCP Santa Maria City buildout should be included in the analysis to ensure all intersections operate in all future conditions or to determine if new improvements or rights-of-way would be necessary.</p> <p>Refer to response to comment SBPWT-1 regarding OCP buildout and response to comment SBPWT-6 regarding the net project-added traffic at the additional recommended intersections.</p>																																																

Comment No.	Response																																			
SBPWT-5	<p>The comment refers to page 10 of the Traffic and Circulation Study and indicates that counts older than 2 years do not meet County standards.</p> <p>The original traffic study for the project was initiated in 2021 when the baseline traffic counts were less than 2 years old. The traffic counts used for the analysis were collected in 2019 and thus represent conditions prior to the Covid-19 pandemic. Supplemental traffic counts conducted on South Broadway and UVP in 2023 showed less traffic than the 2019 traffic counts, thus the analysis completed in the traffic study is conservative. Refer to EIR Volume 2, Appendix A for the traffic count data that was conducted in 2023.</p>																																			
SBPWT-6	<p>The comment refers to page 11 of the Traffic and Circulation Study and indicates that the study area for the analysis should include all major intersections within an approximate one-mile radius. The commenter identifies that, in the County's opinion, the following intersections should be added to the study: Lakeview/Bradley, Foster/Bradley, Foster/Hummel Drive, Clark/135 NB, Clark/135 SB, Clark/Orcutt Frontage Road, Clark/Foxenwood and Foster/California.</p> <p>As explained in response to comment SBPWT-2, the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study. In addition, it should be noted that these comments do not affect the findings of the EIR transportation analyses, which are based primarily on VMT.</p> <p>The data presented in response to comment SBPWT-1 shows that the development of the proposed project depicted in the conceptual site plan would generate 67 more PM peak hour trips than the development envisioned for the site in the OCP. The distribution of the net difference in trips would not measurably change the levels of service (LOS) or trigger the need to evaluate the additional intersections requested by the County. Table SBPWT-3 shows the OCP buildout LOS and net project-added traffic at these locations.</p> <p><b>Table SBPWT-3. Supplemental Analysis - Study Area Intersections Requested Levels of Service, PM Peak Hour</b></p> <table><tr><th>OCP Intersection</th><th>Intersection</th><th>Buildout V/C / Delay LOS</th><th>PM Peak Hour Project Added Trips</th><th>V/C Change</th></tr><tr><td>3</td><td>Lakeview Rd/Bradley Rd</td><td>0.78 LOS C</td><td>1 PHT</td><td>0.0</td></tr><tr><td>5</td><td>Foster Rd/California Blvd</td><td>3.7 LOS A</td><td>2 PHT</td><td>0.0</td></tr><tr><td>7</td><td>Foster/Bradley Rd</td><td>0.44 LOS A</td><td>1 PHT</td><td>0.0</td></tr><tr><td>12</td><td>Clark Ave/135 SB</td><td>0.68 LOS B</td><td>0 PHT</td><td>0.0</td></tr><tr><td>13</td><td>Clark Ave/135 NB</td><td>0.72 LOS C</td><td>7 PHT</td><td>0.0</td></tr><tr><td>14</td><td>Clark Ave/Orcutt Frontage Road</td><td>0.70 LOS B</td><td>8 PHT</td><td>0.0</td></tr></table> <p>Source: ATE (2023)</p> <p>Note: V/C = volume/capacity; PHT = peak hour trips; SB = southbound; NB = northbound</p> <p>Figure B in EIR Volume 2, Appendix A shows the trip distribution and assignment of the net project-added traffic at these locations. As shown, the additional project-added traffic would not change the findings of the OCP buildout analysis.</p>	OCP Intersection	Intersection	Buildout V/C / Delay LOS	PM Peak Hour Project Added Trips	V/C Change	3	Lakeview Rd/Bradley Rd	0.78 LOS C	1 PHT	0.0	5	Foster Rd/California Blvd	3.7 LOS A	2 PHT	0.0	7	Foster/Bradley Rd	0.44 LOS A	1 PHT	0.0	12	Clark Ave/135 SB	0.68 LOS B	0 PHT	0.0	13	Clark Ave/135 NB	0.72 LOS C	7 PHT	0.0	14	Clark Ave/Orcutt Frontage Road	0.70 LOS B	8 PHT	0.0
OCP Intersection	Intersection	Buildout V/C / Delay LOS	PM Peak Hour Project Added Trips	V/C Change																																
3	Lakeview Rd/Bradley Rd	0.78 LOS C	1 PHT	0.0																																
5	Foster Rd/California Blvd	3.7 LOS A	2 PHT	0.0																																
7	Foster/Bradley Rd	0.44 LOS A	1 PHT	0.0																																
12	Clark Ave/135 SB	0.68 LOS B	0 PHT	0.0																																
13	Clark Ave/135 NB	0.72 LOS C	7 PHT	0.0																																
14	Clark Ave/Orcutt Frontage Road	0.70 LOS B	8 PHT	0.0																																
SBPWT-7	<p>The comment indicates that the existing UVP/Hummel Drive intersection does not meet County LOS standards.</p> <p>It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p> <p>The City agrees that the existing UVP/Hummel Drive intersection does not meet County LOS standards. Also, the Traffic and Circulation Study that was included in the Draft EIR, which is also provided in this Final EIR, also concludes that the UVP/Hummel Drive intersection requires improvements. The City has clarified in the EIR Project Description (Chapter 2) that this would be a requirement of the future discretionary permit entitlements for development of the project site as depicted in the conceptual site plan (EIR Table 2-4 in Chapter 2, Project Description). Further, EIR Table 2-6 clarifies the timing of the intersection improvements, as follows:</p> <p>UVP and Hummel Drive intersection improvements, including signalization, to be constructed in Year 1 of the development, prior to the full buildout of the project</p>																																			



Comment No.	Response
	(i.e., the 495 units and/or 146,300 square feet of commercial development, including the self-storage (106,800 square feet excluding the self-storage)).
SBPWT-8	<p>The comment refers to page 15 of the Traffic and Circulation Study and indicates that SBPWT does not see the project as a mixed-use development. The commenter refers to NCHRP 684 (<i>NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments</i>), quoting language directly from NCHRP 684, but only related to internal trips. The comment further states that each quadrant of the project should undergo a separate mixed-use analysis given the commenters position that combining all quadrants as a single mixed-use development is not appropriate. The comment also indicates that the pass-by analysis needs to be more transparent and show, on a clear diagram, the volumes reduced on the main roadway (as negative values) and the trips reassigned (as positive values) to the driveways and turn pockets.</p> <p>If they were to be approved, the proposed applications for annexation and a General Plan Amendment and Rezone would not result in development of the site immediately upon approval. Should the site be annexed into the City of Santa Maria, the future development of the project site as depicted in the conceptual site plan in the EIR would require the approval of discretionary entitlements (e.g., Planned Development Permits, Tract Maps), under the review of the City of Santa Maria Planning Commission.</p> <p>The Traffic and Circulation Study uses NCHRP 684 to estimate the internal mixed-use trips for the project. This report provides industry-standard procedures for developing mixed-use traffic adjustments. NCHRP 684 defines mixed-use projects as follows:</p> <p style="padding-left: 40px;">Mixed-Use Development: For the purposes of this project, it has been deemed appropriate and necessary to expand this definition to include multi-use developments. A multi-use development is a real estate project of separate uses of differing and complementary, interacting land uses that do not necessarily share parking and may not be internally interconnected except by public street and/or other public transportation facilities.</p> <p>The Richard's Ranch project, as depicted in the conceptual site plan in Chapter 2 of the EIR, clearly meets this definition and should be treated as a mixed-use development. NCHRP 684 report adjustments were therefore correctly applied in the traffic analysis.</p> <p>While the Traffic and Circulation Study will not be revised at this juncture, in order to be responsive to the SBPWT's concerns, a supplemental analysis has been conducted to consider an adjustment in the NCHRP internal capture model to include vehicle occupancies, proximity reductions (interchange distances), and pass-by trips. The results showed that the AM capture changed from 13% to 8% and the PM capture changed from 45% to 43%. The average daily trip capture estimate changed from 30% to 26% (average of AM and PM). To provide a more conservative analysis, and to support the response to comment process, ATE provided a supplemental analysis with trip generation calculations assuming an 8% factor for the AM peak hour, a 30% factor for the PM peak hour, and a 19% factor for the average daily trips (average of AM and PM peak hour factors).</p> <p>These additional, more conservative, trip generation estimates for the project (as depicted in the conceptual site plan in Chapter 2, Project Description, of the EIR) are presented in Table SBPWT-4, and Table SBPWT-5 compares the current trip generation estimates with the previous trip generation estimates within the Traffic and Circulation Study. EIR Volume 2, Appendix A provides detailed calculations to support this comment response and the information presented in the tables.</p>

**Table SBPWT-4. Supplemental Analysis - Project Trip Generation, External Trip Summary**

Land Use	ADT (a)	AM Peak Trips (b)	PM Peak Trips (c)
Shopping Center	2,947	143	227
Sit Down Restaurants	616	42	48
Fast Food Restaurants w/Drive-Thru	3,337	385	195
Gas Station	390	35	32
Car Wash	110	4	10
Lube Station	97	8	10
Mini-Storage	46	3	4
Residential	2,646	167	167
<b>Total</b>	<b>10,189</b>	<b>787</b>	<b>693</b>

Comment No.	Response																																											
	<p>Source: ATE (2023)</p> <p>Note: ADT = average daily trips</p> <p>(a) Assumes Internal Capture Factor of 19% for ADT.</p> <p>(b) Assumes Internal Capture Factor of 8% for the AM Peak Hour.</p> <p>(c) Assumes Internal Capture Factor of 30% for the PM Peak Hour.</p> <p><b>Table SBPWT-5. Project Trip Generation Estimate Comparison, Supplemental Analysis vs Traffic and Circulation Study</b></p> <table><tr><th>Land Use</th><th>ADT</th><th>AM Peak Trips</th><th>PM Peak Trips</th></tr><tr><td>Current</td><td>10,189</td><td>787</td><td>693</td></tr><tr><td>Richards Ranch Traffic and Circulation Study (ATE 2022)</td><td>8,262</td><td>665</td><td>547</td></tr><tr><td><b>Net Totals</b></td><td><b>+ 1,927</b></td><td><b>+ 122</b></td><td><b>+ 146</b></td></tr></table> <p>Source: ATE (2023)</p> <p>Note: ADT = average daily trips</p> <p>Additionally, EIR Volume 2, Appendix A includes Figure C, which shows the pass-by traffic volumes are included in the overall project-added traffic volumes, and Figure D, which shows the pass-by trip distribution as requested. Sensitivity testing has been completed for the intersections in the project study area based on the new internal factors and the revised access system. Table SBPWT-6 presents the results of the supplemental sensitivity analysis.</p> <p><b>Table SBPWT-6. Supplemental Analysis - Levels of Service, Adjacent Intersections/Sensitivity Analysis</b></p> <table><tr><th rowspan="2">Intersection</th><th rowspan="2">Peak Hour</th><th colspan="2">ICU or Delay / LOS</th></tr><tr><th>Existing + Project</th><th>Cumulative + Project</th></tr><tr><td rowspan="2">UVP/Orcutt Expressway</td><td>AM</td><td>0.70 / LOS B</td><td>0.74 / LOS C</td></tr><tr><td>PM</td><td>0.78 / LOS C</td><td>0.82 / LOS D</td></tr><tr><td rowspan="2">UVP/Orcutt Road</td><td>AM</td><td>0.74 / LOS C</td><td>0.78 / LOS C</td></tr><tr><td>PM</td><td>0.70 / LOS B</td><td>0.74 / LOS C</td></tr><tr><td rowspan="2">UVP/Hummel Drive (a)</td><td>AM</td><td>0.47 / LOS A</td><td>0.49 / LOS A</td></tr><tr><td>PM</td><td>0.50 / LOS A</td><td>0.54 / LOS A</td></tr></table> <p>Source: ATE (2023)</p> <p>Note: ICU = intersection capacity utilization</p> <p>(a) Assumes UVP widening and traffic signal installation.</p>	Land Use	ADT	AM Peak Trips	PM Peak Trips	Current	10,189	787	693	Richards Ranch Traffic and Circulation Study (ATE 2022)	8,262	665	547	<b>Net Totals</b>	<b>+ 1,927</b>	<b>+ 122</b>	<b>+ 146</b>	Intersection	Peak Hour	ICU or Delay / LOS		Existing + Project	Cumulative + Project	UVP/Orcutt Expressway	AM	0.70 / LOS B	0.74 / LOS C	PM	0.78 / LOS C	0.82 / LOS D	UVP/Orcutt Road	AM	0.74 / LOS C	0.78 / LOS C	PM	0.70 / LOS B	0.74 / LOS C	UVP/Hummel Drive (a)	AM	0.47 / LOS A	0.49 / LOS A	PM	0.50 / LOS A	0.54 / LOS A
Land Use	ADT	AM Peak Trips	PM Peak Trips																																									
Current	10,189	787	693																																									
Richards Ranch Traffic and Circulation Study (ATE 2022)	8,262	665	547																																									
<b>Net Totals</b>	<b>+ 1,927</b>	<b>+ 122</b>	<b>+ 146</b>																																									
Intersection	Peak Hour	ICU or Delay / LOS																																										
		Existing + Project	Cumulative + Project																																									
UVP/Orcutt Expressway	AM	0.70 / LOS B	0.74 / LOS C																																									
	PM	0.78 / LOS C	0.82 / LOS D																																									
UVP/Orcutt Road	AM	0.74 / LOS C	0.78 / LOS C																																									
	PM	0.70 / LOS B	0.74 / LOS C																																									
UVP/Hummel Drive (a)	AM	0.47 / LOS A	0.49 / LOS A																																									
	PM	0.50 / LOS A	0.54 / LOS A																																									
SBPWT-9	<p>The comment refers to page 16 of the Traffic and Circulation Study and states that the pass-by percentages are very high, indicating that 10% of adjacent roadway volumes and a max of 25% project total are used commonly and are more appropriate.</p> <p>The pass-by rates used in the Traffic and Circulation Study were obtained from the ITE Trip Generation manual. The pass-by rates used were as follows: Shopping Center (#821 Shopping Plaza Weekday PM): 40%, Fast Food Restaurant (#934 Fast-Food With Drive-Thru PM): 55%, Gas Station (#945 Convenience Store/Gas Station Between 9 and 20 VFP PM): 75%, Car Wash (Local Studies): 20%. The pass-by analysis assumed that the trips would be drawn from existing traffic volumes on Orcutt Road (3,000 ADT north and 1,000 south), UVP (16,800 ADT), and diverted traffic from Orcutt Expressway (29,200 ADT). The existing volumes on the adjacent roadways (50,000 ADT) support the pass-by adjustments used for the analysis.</p>																																											

Comment No.	Response
	<p>No AM pass-by rates are supplied for shopping centers and sit-down restaurants; therefore the PM pass-by rates were used for the AM peak hour.</p> <p>To provide supplemental information for consideration in the response to comments process, a more conservative 20% pass-by factor for the AM peak hour was applied in the trip generation estimates which resulted in a net change of 46 primary peak hour trips (see trip generation spreadsheet in EIR Volume 2, Appendix A). This minor change in primary trip generation does not affect the findings of the analysis. See the supplemental analysis of trip generation and sensitivity analysis presented in response to comment SBPWT-8.</p>
SBPWT-10	<p>The comment refers to page 19 of the Traffic and Circulation Study and notes that the UVP/Hummel Drive intersection does not meet County LOS standards.</p> <p>Refer to response to comment SBPWT-7.</p>
SBPWT-11	<p>The comment refers to page 24 of the Traffic and Circulation Study and notes that the UVP/Hummel Drive intersection does not meet County LOS standards.</p> <p>Refer to response to comment SBPWT-7.</p>
SBPWT-12	<p>The comment refers to page 25 of the Traffic and Circulation Study and indicates that the analysis is not consistent with County roadway segment analysis procedures; the comment requests that each County segment be updated/re-analyzed for consistency with County procedures.</p> <p>The Traffic and Circulation Study applied the appropriate County OCP consistency standards for the analysis of the UVP, which indicated that the intersections along the segment to the east would operate acceptably. The County has reserved the right-of-way to expand the UVP from SR 135 to US 101 to four lanes in the future as the OCP builds out. The project includes completion of the 4-lane widening along its frontage, as indicated in EIR Chapter 2, Project Description.</p>
SBPWT-13	<p>The comment indicates that full access should not be provided at the Parcel 2 and Parcel 4 driveway along UVP due to the high potential for left-turn/through collisions.</p> <p>It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT. ATE and the Applicant reviewed the design of the Parcel 2 and 4A driveways on UVP with City staff and the project team and determined that a median configuration should be implemented to allow left-turns in at both driveways with no left-turns out. See response to comment SBPWT-2 for additional information.</p>
SBPWT-14	<p>The comment indicates that medians should be provided at the driveways between Parcel 2 and Parcel 4 along UVP.</p> <p>ATE and the Applicant reviewed the design of the Parcel 2 and 4A driveways on UVP with City staff and the project team and determined that a median configuration should be implemented to allow left-turns in at both driveways with no left-turns out. See response to comment SBPWT-2 for additional information.</p>
SBPWT-15	<p>The comment refers to page 32 of the Traffic and Circulation Study and indicates that the Orcutt Road median should be extended per the County-provided markups (see comment SBPWT-32)</p> <p>ATE and the Applicant agree that the median can be extended on Orcutt Road to the Orcutt Road/UVF intersection (see Figure E in EIR Volume 2, Appendix A). This comment is regarding the project's frontage improvements on Orcutt Road. However, it should be noted that the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study, as explained in response to comment SBPWT-2. In addition, it should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT. The frontage road design issues would therefore be addressed during the City of Santa Maria's design review process.</p>
SBPWT-16	<p>The comment refers to page 34 of the Traffic and Circulation Study and indicates the Orcutt Road intersection with Parcel 4A does not meet County design standards and explains some SBPWT preferences.</p> <p>It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p> <p>County standards for the 75-foot distance from the property line would not apply to the project if the annexation were to be approved and the City became the jurisdiction with authority over the circulation system and the project. Nonetheless, ATE, the Applicant, and the City considered sight distance triangles for the Parcel 4A driveway on Orcutt Road. The Caltrans Manual indicates that the minimum corner sight distance for a private road intersection and rural driveway should be equal to the stopping sight distance. The vegetation would need to be kept below 3.5 feet to ensure a minimum of 300 feet for stopping sight distance (assuming a 40-mph design speed based on the road curvature).</p>

Comment No.	Response
	ATE conducted an additional sight distance analysis at the proposed driveway location and confirmed that the vertical sight distance looking from the proposed driveway to the south is 495 feet, which would satisfy the stopping sight distance requirement for a private road connection or driveway assuming a 45-mph design speed (360 feet), thus the sight distance provided satisfies this requirement.

SBPWT-17

The comment refers to page 37 of the Traffic and Circulation Study and indicates that the UVP/Parcel 2 intersection is not consistent with County LOS standards.

It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.

Tables SBPWT-7 and SBPWT-8 present the results of a supplemental analysis for the County's benefit which provides more conservative LOS calculations for AM and PM peak hour project driveway operations, using the assumptions described in responses SBPWT-8 and SBPWT-9.

**Table SBPWT-7. Supplemental Analysis - AM Peak Hour Project Driveway Operations**

Intersection	Delay / LOS	
	Existing + Project	Cumulative + Project
Orcutt Road/Parcel 1&2 Driveways		
EB Parcel 1 Driveway Left+Thru+Right	9.3 sec. / LOS A	9.3 sec. / LOS A
WB Parcel 2 Driveway Left+Thru+Right	15.4 sec. / LOS C	15.6 sec. / LOS C
NB Orcutt Road Left	7.5 sec. / LOS A	7.5 sec. / LOS A
SB Orcutt Road Left	7.8 sec. / LOS A	7.9 sec. / LOS A
Average Weighted Delay	11.5 sec. / LOS B	11.6 sec. / LOS B
UVP/Parcel 2 Easterly & Parcel 4 Driveways		
EB Union Valley Parkway Left	11.1 sec. / LOS B	12.0 sec. / LOS B
WB Union Valley Parkway Left	9.5 sec. / LOS A	9.8 sec. / LOS A
NB Parcel 4 Driveway Right	11.8 sec. / LOS B	12.2 sec. / LOS B
SB Parcel 2 Easterly Driveway	11.6 sec. / LOS B	12.3 sec. / LOS B
Average Weighted Delay	11.2 sec. / LOS B	11.9 sec. / LOS B
UVP/Parcel 2 Westerly Driveway		
SB Parcel 2 Westerly Driveway Right	14.8 sec./ LOS B	16.5 sec./ LOS C
Orcutt Road/Parcel 3 Northerly Driveway		
EB Parcel 3 Northerly Driveway Right	9.7 sec./ LOS A	9.7 sec./ LOS A
Orcutt Road/Parcel 3 Southerly Driveway		
EB Parcel 3 Southerly Driveway Left+Right	12.9 sec./ LOS B	13.0 sec./ LOS B
NB Orcutt Road Left	7.7 sec./ LOS A	7.7 sec./ LOS A
Average Weighted Delay	12.6 sec./ LOS B	12.7 sec./ LOS B
Orcutt Road/Parcel 5 Driveway		
WB Parcel 5 Driveway Left+Right	10.8 sec./ LOS B	10.8 sec./ LOS B
SB Orcutt Road Left	8.0 sec./ LOS A	8.0 sec./ LOS A
Average Weighted Delay	10.3 sec./ LOS B	10.3 sec./ LOS B

Source: ATE (2023)

Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound

Comment No.	Response																																																																																			
<b>Table SBPWT-8. Supplemental Analysis - PM Peak Hour Project Driveway Operations</b>																																																																																				
	<table><tr><th rowspan="2">Intersection</th><th>Delay / LOS</th><th>Delay / LOS</th></tr><tr><th>Existing + Project</th><th>Cumulative + Project</th></tr><tr><td colspan="3">Orcutt Road/Parcel 1&amp;2 Driveways</td></tr><tr><td>EB Parcel 1 Driveway Left+Thru+Right</td><td>9.0 sec. / LOS A</td><td>9.0 sec. / LOS A</td></tr><tr><td>WB Parcel 2 Driveway Left+Thru+Right</td><td>13.6 sec. / LOS B</td><td>13.7 sec. / LOS B</td></tr><tr><td>NB Orcutt Road Left</td><td>7.5 sec. / LOS A</td><td>7.5 sec. / LOS A</td></tr><tr><td>SB Orcutt Road Left</td><td>7.6 sec. / LOS A</td><td>7.7 sec. / LOS A</td></tr><tr><td>Average Weighted Delay</td><td>10.8 sec. / LOS B</td><td>10.8 sec. / LOS B</td></tr><tr><td colspan="3">UVP/Parcel 2 Easterly &amp; Parcel 4 Driveways</td></tr><tr><td>EB Union Valley Parkway Left</td><td>10.1 sec. / LOS B</td><td>10.7 sec. / LOS B</td></tr><tr><td>WB Union Valley Parkway Left</td><td>11.1 sec. / LOS B</td><td>11.8 sec. / LOS B</td></tr><tr><td>NB Parcel 4 Driveway Right</td><td>13.0 sec. / LOS B</td><td>13.8 sec. / LOS B</td></tr><tr><td>SB Parcel 2 Easterly Driveway</td><td>11.1 sec. / LOS B</td><td>11.6 sec. / LOS B</td></tr><tr><td>Average Weighted Delay</td><td>10.8 sec. / LOS B</td><td>11.4 sec. / LOS B</td></tr><tr><td colspan="3">UVP/Parcel 2 Westerly Driveway</td></tr><tr><td>SB Parcel 2 Westerly Driveway Right</td><td>13.7 sec./ LOS B</td><td>14.8 sec./ LOS B</td></tr><tr><td colspan="3">Orcutt Road/Parcel 3 Northerly Driveway</td></tr><tr><td>EB Parcel 3 Northerly Driveway Right</td><td>9.6 sec./ LOS A</td><td>9.7 sec./ LOS A</td></tr><tr><td colspan="3">Orcutt Road/Parcel 3 Southerly Driveway</td></tr><tr><td>EB Parcel 3 Southerly Driveway Left+Right</td><td>11.1 sec./ LOS B</td><td>11.1 sec./ LOS B</td></tr><tr><td>NB Orcutt Road Left</td><td>7.7 sec./ LOS A</td><td>7.7 sec./ LOS A</td></tr><tr><td>Average Weighted Delay</td><td>10.9 sec./ LOS B</td><td>10.9 sec./ LOS B</td></tr><tr><td colspan="3">Orcutt Road/Parcel 5 Driveway</td></tr><tr><td>WB Parcel 5 Driveway Left+Right</td><td>9.3 sec./ LOS A</td><td>9.4 sec./ LOS A</td></tr><tr><td>SB Orcutt Road Left</td><td>7.6 sec./ LOS A</td><td>7.6 sec./ LOS A</td></tr><tr><td>Average Weighted Delay</td><td>8.4 sec./ LOS A</td><td>8.5 sec./ LOS A</td></tr><tr><td colspan="3">Source: ATE (2023)</td></tr><tr><td colspan="3">Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound</td></tr></table>	Intersection	Delay / LOS	Delay / LOS	Existing + Project	Cumulative + Project	Orcutt Road/Parcel 1&2 Driveways			EB Parcel 1 Driveway Left+Thru+Right	9.0 sec. / LOS A	9.0 sec. / LOS A	WB Parcel 2 Driveway Left+Thru+Right	13.6 sec. / LOS B	13.7 sec. / LOS B	NB Orcutt Road Left	7.5 sec. / LOS A	7.5 sec. / LOS A	SB Orcutt Road Left	7.6 sec. / LOS A	7.7 sec. / LOS A	Average Weighted Delay	10.8 sec. / LOS B	10.8 sec. / LOS B	UVP/Parcel 2 Easterly & Parcel 4 Driveways			EB Union Valley Parkway Left	10.1 sec. / LOS B	10.7 sec. / LOS B	WB Union Valley Parkway Left	11.1 sec. / LOS B	11.8 sec. / LOS B	NB Parcel 4 Driveway Right	13.0 sec. / LOS B	13.8 sec. / LOS B	SB Parcel 2 Easterly Driveway	11.1 sec. / LOS B	11.6 sec. / LOS B	Average Weighted Delay	10.8 sec. / LOS B	11.4 sec. / LOS B	UVP/Parcel 2 Westerly Driveway			SB Parcel 2 Westerly Driveway Right	13.7 sec./ LOS B	14.8 sec./ LOS B	Orcutt Road/Parcel 3 Northerly Driveway			EB Parcel 3 Northerly Driveway Right	9.6 sec./ LOS A	9.7 sec./ LOS A	Orcutt Road/Parcel 3 Southerly Driveway			EB Parcel 3 Southerly Driveway Left+Right	11.1 sec./ LOS B	11.1 sec./ LOS B	NB Orcutt Road Left	7.7 sec./ LOS A	7.7 sec./ LOS A	Average Weighted Delay	10.9 sec./ LOS B	10.9 sec./ LOS B	Orcutt Road/Parcel 5 Driveway			WB Parcel 5 Driveway Left+Right	9.3 sec./ LOS A	9.4 sec./ LOS A	SB Orcutt Road Left	7.6 sec./ LOS A	7.6 sec./ LOS A	Average Weighted Delay	8.4 sec./ LOS A	8.5 sec./ LOS A	Source: ATE (2023)			Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound		
Intersection	Delay / LOS		Delay / LOS																																																																																	
	Existing + Project	Cumulative + Project																																																																																		
Orcutt Road/Parcel 1&2 Driveways																																																																																				
EB Parcel 1 Driveway Left+Thru+Right	9.0 sec. / LOS A	9.0 sec. / LOS A																																																																																		
WB Parcel 2 Driveway Left+Thru+Right	13.6 sec. / LOS B	13.7 sec. / LOS B																																																																																		
NB Orcutt Road Left	7.5 sec. / LOS A	7.5 sec. / LOS A																																																																																		
SB Orcutt Road Left	7.6 sec. / LOS A	7.7 sec. / LOS A																																																																																		
Average Weighted Delay	10.8 sec. / LOS B	10.8 sec. / LOS B																																																																																		
UVP/Parcel 2 Easterly & Parcel 4 Driveways																																																																																				
EB Union Valley Parkway Left	10.1 sec. / LOS B	10.7 sec. / LOS B																																																																																		
WB Union Valley Parkway Left	11.1 sec. / LOS B	11.8 sec. / LOS B																																																																																		
NB Parcel 4 Driveway Right	13.0 sec. / LOS B	13.8 sec. / LOS B																																																																																		
SB Parcel 2 Easterly Driveway	11.1 sec. / LOS B	11.6 sec. / LOS B																																																																																		
Average Weighted Delay	10.8 sec. / LOS B	11.4 sec. / LOS B																																																																																		
UVP/Parcel 2 Westerly Driveway																																																																																				
SB Parcel 2 Westerly Driveway Right	13.7 sec./ LOS B	14.8 sec./ LOS B																																																																																		
Orcutt Road/Parcel 3 Northerly Driveway																																																																																				
EB Parcel 3 Northerly Driveway Right	9.6 sec./ LOS A	9.7 sec./ LOS A																																																																																		
Orcutt Road/Parcel 3 Southerly Driveway																																																																																				
EB Parcel 3 Southerly Driveway Left+Right	11.1 sec./ LOS B	11.1 sec./ LOS B																																																																																		
NB Orcutt Road Left	7.7 sec./ LOS A	7.7 sec./ LOS A																																																																																		
Average Weighted Delay	10.9 sec./ LOS B	10.9 sec./ LOS B																																																																																		
Orcutt Road/Parcel 5 Driveway																																																																																				
WB Parcel 5 Driveway Left+Right	9.3 sec./ LOS A	9.4 sec./ LOS A																																																																																		
SB Orcutt Road Left	7.6 sec./ LOS A	7.6 sec./ LOS A																																																																																		
Average Weighted Delay	8.4 sec./ LOS A	8.5 sec./ LOS A																																																																																		
Source: ATE (2023)																																																																																				
Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound																																																																																				
SBPWT-18	The comment states that intersection operations based on reduced volumes assumed by the project being mixed-use are not accurate and reiterates the opinion that the project is not a mixed-use project. See response SBPWT-8 for discussion on NCHRP 684 methodology and additional trip generation data and assumptions.																																																																																			
SBPWT-19	<p>If they were to be approved, the project applications for annexation and a General Plan Amendment and Rezone would not result in development of the site immediately upon approval. Should the site be annexed into the City of Santa Maria, the future development of the project site as depicted in the conceptual site plan in the EIR would require the approval of discretionary entitlements (e.g., Planned Development Permits, Tract Maps), under the review of the City of Santa Maria Planning Commission. The comment refers to page 38 of the Traffic and Circulation Study and indicates the commenters belief that the queueing analysis does not appear to reflect a project of the size of the proposed Richards Ranch project.</p> <p>It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p> <p>The queues presented for the concept project driveways were calculated from the data within the LOS worksheets using the Highway Capacity Manual. To provide a more conservative analysis to be responsive to the County, a supplemental analysis for LOS and queue estimates has been provided assuming the new access configuration on UVP, the revised internal capture data, the revised pass-by data, and the using a peak hour factor of 0.92 instead of 1.00 (supplemental analysis queue</p>																																																																																			

Comment No.	Response
	worksheets provided in EIR Volume 2, Appendix A). Tables SBPWT-9 and SBPWT-10 present the results of this supplemental driveway queuing analysis.

**Table SBPWT-9. Supplemental Analysis - AM Peak Hour Driveway Queues**

Intersection	50 <sup>th</sup> Queue Length	95 <sup>th</sup> Queue Length
	Cumulative + Project	Cumulative + Project
Orcutt Road/Parcel 1&2 Driveways		
EB Parcel 1 Driveway Left+Thru+Right	2 Vehicles	3 Vehicles
WB Parcel 2 Driveway Left+Thru+Right	3 Vehicles	4 Vehicles
SB Orcutt Road Left	1 Vehicle	2 Vehicles
NB Orcutt Road Left	<1 Vehicle	<1 Vehicle
UVP/Parcel 2 Easterly & Parcel 4 Driveways		
EB Union Valley Parkway Left	3 Vehicles	4 Vehicles
WB Union Valley Parkway Left	1 Vehicle	2 Vehicles
SB Parcel 2 Easterly Driveway Right	1 Vehicle	1 Vehicle
NB Parcel 4 Driveway Right	2 Vehicles	3 Vehicles
UVP/Parcel 2 Westerly Driveway		
SB Parcel 2 Westerly Driveway Right	3 Vehicles	7 Vehicles
Orcutt Road/Parcel 3 Northerly Driveway		
EB Parcel 3 Northerly Driveway Right	<1 Vehicle	<1 Vehicle
Orcutt Road/Parcel 3 Southerly Driveway		
EB Parcel 3 Southerly Driveway Left+Right	2 Vehicles	3 Vehicles
NB Orcutt Road Left	<1 Vehicle	<1 Vehicle
Orcutt Road/Parcel 5 Driveway		
WB Parcel 5 Driveway Left+Right	2 Vehicles	3 Vehicles
SB Orcutt Road Left	<1 Vehicle	<1 Vehicle

Source: ATE (2023)

Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound

Comment No.	Response	
<b>Table SBPWT-10. Supplemental Analysis - PM Peak Hour Driveway Queues</b>		
Intersection	50 <sup>th</sup> Queue Length	95 <sup>th</sup> Queue Length
	Cumulative + Project	Cumulative + Project
Orcutt Road/Parcel 1&2 Driveways		
EB Parcel 1 Driveway Left+Thru+Right	2 Vehicles	3 Vehicles
WB Parcel 2 Driveway Left+Thru+Right	3 Vehicles	4 Vehicles
SB Orcutt Road Left	<1 Vehicle	<1 Vehicle
NB Orcutt Road Left	1 Vehicle	2 Vehicles
UVP/Parcel 2 Easterly & Parcel 4 Driveways		
EB Union Valley Parkway Left	2 Vehicles	4 Vehicles
WB Union Valley Parkway Left	1 Vehicle	2 Vehicles
SB Parcel 2 Easterly Driveway Right	2 Vehicles	4 Vehicles
NB Parcel 4 Driveway Right	2 Vehicles	2 Vehicles
UVP/Parcel 2 Westerly Driveway		
SB Parcel 2 Westerly Driveway Right	4 Vehicles	7 Vehicles
Orcutt Road/Parcel 3 Northerly Driveway		
EB Parcel 3 Northerly Driveway Right	<1 Vehicle	<1 Vehicle
Orcutt Road/Parcel 3 Southerly Driveway		
EB Parcel 3 Southerly Driveway Left+Right	3 Vehicles	4 Vehicles
NB Orcutt Road Left	1 Vehicle	2 Vehicles
Orcutt Road/Parcel 5 Driveway		
WB Parcel 5 Driveway Left+Right	2 Vehicles	3 Vehicles
SB Orcutt Road Left	<1 Vehicle	<1 Vehicle
Source: ATE (2023)		
Note: EB = eastbound; WB = westbound; NB = northbound; SB = southbound		
It is noted that this comment relates to the project's site access and circulation design components, which are conceptual at this time. However, it should be noted that the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study, as explained in response to comment SBPWT-2. If the conceptual project proceeds following annexation with the Planned Development Permit process, revisions would continue to be required by the City and made by the Applicant.		
SBPWT-20	The comment refers to page 39 of the Traffic and Circulation Study and indicates that the queueing analysis does not appear to reflect a project of the size of the proposed Richards Ranch project. Refer to response to comment SBPWT-19.	
SBPWT-21	The comment indicates that sight distance should be evaluated as part of the EIR for each driveway location and provides some additional explanation of this request.  It should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT. Refer also to response to comment SBPWT-19.	
SBPWT-22	The comment refers to page 40 of the Traffic and Circulation Study and indicates that the UVP/Parcel 2 intersection is potentially dangerous as shown and that SBPWT feels it should be redesigned. The commenter reiterates that SBPWT does not view the project as a mixed-use project.  See response to comment SBPWT-2 for discussion on the revised conceptual plan to allow left-turns in at both driveways with no left-turns out. The final design of access to the site will be completed through the future discretionary Planned Development process, following annexation of the site into the City of Santa Maria. Tables SBPWT-11 and SBPWT-12 present the results of the supplemental queuing analysis. See also response to comment SBPWT-8 for a discussion of why the project, as depicted in the conceptual site plan, is defined as a mixed-use project, contrary to the SBPWT's perspective.	

Comment No.	Response
-------------	----------

**Table SBPWT-11. Supplemental Analysis - AM Peak Hour Storage Length and Left-Turn Queues and Storage Requirements**

Intersection	Storage Length	50 <sup>TH</sup> % Queue	95 <sup>th</sup> % Queue
UVP/Orcutt Expressway			
WB Left-Turn #1 (a)	465 Feet	113 Feet	155 Feet
WB Left-Turn #2 (a)		116 Feet	179 Feet
WB Through #1	340 Feet	56 Feet	124 Feet
WB Through #2	340 Feet	105 Feet	281 Feet
SB Left-Turn #1	615 Feet	108 Feet	157 Feet
SB Left-Turn #2	615 Feet	142 Feet	164 Feet
UVP/Orcutt Road			
EB Left-Turn (a)	185 Feet	119 Feet	163 Feet
EB Through #1	340 Feet	147 Feet	237 Feet
EB Through #2	340 Feet	170 Feet	246 Feet
WB Left-Turn	270 Feet	136 Feet	268 Feet
NB Left-Turn	245 Feet	123 Feet	158 Feet
SB Left-Turn	145 Feet	61 Feet	88 Feet

(a) Assumes modified median on UVP as shown on Figure F in EIR Volume 2, Appendix A.

Source: ATE (2023)

Note: WB = westbound; SB = southbound; EB = eastbound; NB = northbound

**Table SBPWT-12. Supplemental Analysis - PM Peak Hour Storage Length and Left-Turn Queues and Storage Requirements**

Intersection	Storage Length	50 <sup>TH</sup> % Queue	95 <sup>th</sup> % Queue
UVP/Orcutt Expressway			
WB Left-Turn #1 (a)	465 Feet	99 Feet	145 Feet
WB Left-Turn #2 (a)		119 Feet	184 Feet
WB Through #1	340 Feet	90 Feet	153 Feet
WB Through #2	340 Feet	86 Feet	138 Feet
SB Left-Turn #1	615 Feet	268 Feet	372 Feet
SB Left-Turn #2	615 Feet	316 Feet	411 Feet
UVP/Orcutt Road			
EB Left-Turn (a)	185 Feet	92 Feet	131 Feet
EB Through #1	340 Feet	192 Feet	261 Feet
EB Through #2	340 Feet	204 Feet	296 Feet
WB Left-Turn	270 Feet	106 Feet	202 Feet
NB Left-Turn	245 Feet	72 Feet	120 Feet
SB Left-Turn	145 Feet	64 Feet	127 Feet

(a) Assumes modified median on UVP as shown on Figure F in EIR Volume 2, Appendix A.

Source: ATE (2023)

Note: WB = westbound; SB = southbound; EB = eastbound; NB = northbound



Comment No.	Response
SBPWT-23	<p>The comment refers to page 41 of the Traffic and Circulation Study and opines that if the intersection volumes are based on reduced volumes assuming the project is a mixed-use project then the tables in the analysis are not accurate.</p> <p>See response to comment SBPWT-8 for a discussion of why the project, as depicted in the conceptual site plan, is defined as a mixed-use project, contrary to the SBPWT's perspective.</p>
SBPWT-24	<p>As a continuation of comment SBPWT-23, the comment indicated that the project is not a mixed-use project.</p> <p>See response to comment SBPWT-8 for a discussion of why the project, as depicted in the conceptual site plan, is defined as a mixed-use project, contrary to the SBPWT's perspective.</p>
SBPWT-25	<p>The comment indicates that the accident analysis on page 44 of the Traffic and Circulation Study should be updated to reflect the most recent data available.</p> <p>The accident analysis provided in the Traffic and Circulation Study is based on the most recent 3 years of accident data available provided by City staff when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant.</p>
SBPWT-26	<p>If they were to be approved, the project applications for annexation and a General Plan Amendment and Rezone would not result in development of the site immediately upon approval. Should the site be annexed into the City of Santa Maria, the future development of the project site as depicted in the conceptual site plan in the EIR would require the approval of discretionary entitlements (e.g., Planned Development Permits, Tract Maps), under the review of the City of Santa Maria Planning Commission.</p> <p>The comment refers to page 45 of the Traffic and Circulation Study and indicates that signal/stop warrants should be provided for all project driveways to public roads as required by County Standards for arterials and collectors.</p> <p>Signal warrants were reviewed by the City and ATE at the conceptual project driveways and the warrants are not met, nor are signals advised for these locations. The signal warrants are not met for the UVP/Parcel 2 Easterly Driveway. See response to comment SBPWT-2 for discussion plan to allow left-turns in at both driveways with no left-turns out at the UVP/Parcel 2 Easterly Driveway.</p> <p>This comment relates to the conceptual project's site access and circulation design components. It should be noted that the comments provided on the traffic and circulation study prepared and circulated as part of the Draft EIR (Traffic and Circulation Study, Appendix E) did not result in the need to revise the traffic and circulation study, as explained in response to comment SBPWT-2. In addition, it should be noted that these comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p>
SBPWT-27	<p>The comment refers to page 48 of the Traffic and Circulation Study. The comment reiterates the opinion that the project is not a mixed-use project.</p> <p>See response to comment SBPWT-8 for a discussion of why the project, as depicted in the conceptual site plan, is defined as a mixed-use project, contrary to the SBPWT's perspective.</p>
SBPWT-28	<p>The comment refers to page 50 of the Traffic and Circulation Study and reiterates that SBPWT does not view the project as mixed-use and that the VMT analysis should be updated.</p> <p>See response to comment SBPWT-8 for a discussion of why the project, as depicted in the conceptual site plan, is defined as a mixed-use project, contrary to the SBPWT's perspective. See also response to comments SBPWT-1 and SBPWT-6.</p>
SBPWT-29	<p>The comment indicates that all roadways should be modeled for anticipated future volumes and widened where necessary based on Santa Barbara standards. Further, the comment indicates that all roads should be constructed to American Association of State Highway and Transportation Officials standards and should be built to State complete street guidelines to include facilities for all anticipated users (e.g., sidewalks, bike lanes, multi-modal users).</p> <p>See response to comment SBPWT-8 for discussion on the NCHRP internal capture model and VMT. The City's VMT screening map (provided in EIR Volume 2, Appendix A) included in the City's Environmental Procedures and Guidelines manual shows that the residential portion of the project is in an area that generates up to the average VMT per capita. Since the project, as depicted in the conceptual site plan, meets the definition as a mixed-use development, as further described in response to comment SBPWT-8, reductions in the traffic generation and resulting VMT production are appropriate. The supplemental analysis completed for the conceptual project show that the internal</p>

Comment No.	Response
	<p>capture rate for the average daily trips generated by the conceptual project is 26%. Assuming a conservative 15% reduction in the residential VMT estimates, the conceptual project would not exceed City VMT thresholds and impacts would be less than significant. The VMT analysis completed by DKS for the commercial component of the project shows a reduction of 43,303 VMT which is a significant reduction in VMT which would reduce the overall project VMT (commercial and residential) to less than significant levels.</p> <p>The project, as depicted in the conceptual site plan, would incorporate the inclusion of two city public transit bus stops as part of its design strategy to improve accessibility to public transportation. These bus stops are strategically positioned to encourage greater usage of public transit, aiming to reduce the reliance on individual vehicles and consequently lower the overall VMT associated with the project. This project element, which is required for future development of the site, is geared towards providing convenient alternatives for commuters and promoting a more sustainable transportation approach to reduce VMT impact.</p>
SBPWT-30	<p>The comment states that a thorough VMT analysis should be completed to support the EIR and that VMT should be minimized by using mixed-use land planning, bus service, bike infrastructure, enhanced walkability, car share programs and/or relocation of the project, or a portion thereof, to a different location on to provide more accessible services and reduced trip lengths.</p> <p>See response to comment SBPWT-8 for discussion on VMT. The future development of the property under the conceptual site plan would incorporate the inclusion of two city public transit bus stops as part of its design strategy to improve accessibility to public transportation. These bus stops would be strategically positioned to encourage greater usage of public transit, aiming to reduce the reliance on individual vehicles and consequently lower the overall VMT associated with the project. This project element, which is required for future development of the site, is geared towards providing convenient alternatives for commuters and promoting a more sustainable transportation approach to reduce VMT impact.</p>
SBPWT-31	<p>The comment indicates that roadway annexations shall conform to the following criteria:</p> <ul style="list-style-type: none"> <li>f. Annex Orcutt Frontage Road north of the proposed project to a tangent section. It is impractical to conform road maintenance in a curve.</li> <li>g. Annex Union Valley Parkway to the eastern project limit.</li> <li>h. Annex to the southern limit on Orcutt Frontage Road or 250 feet south of any proposed intersection, whichever is greater. Having a boundary at or near an intersection is problematic for maintenance and for establishing traffic operational control.</li> </ul> <p>The suggested roadway annexations will be included in the Resolution of Application to Initiate Annexation developed by the City for the proposed project. Items "a." and "c." of the listing by SBPWT are related to the project's frontage improvements on Orcutt Road and UVP. The project is the annexation of the project site (including these frontages) to the City of Santa Maria. If annexation were to be approved, the design of these features would be subject to the City of Santa Maria's roadway design standards. The frontage road design issues would be addressed during the City of Santa Maria's design review process, which would occur after the EIR is certified and after the annexation is approved, if it is approved. UVP would be widened along the project frontage, and the UVP and Hummel Drive intersection would be signalized. These comments do not affect the findings of the EIR transportation analyses, which is based primarily on VMT.</p>
SBPWT-32	<p>The commenter has attached the <i>Richards Ranch Project Updated Traffic and Circulation Study</i> prepared by Associated Transportation Engineers (ATE), dated October 7, 2022.</p> <p>Responses to comments SBPWT-1 through SBPWT-24 respond to these various markups, page numbers of which correspond to the page numbers in the responses.</p>

*This page intentionally left blank.*

## 1.2.7.4 County of Santa Barbara Fire Department



### Fire Department

*"Serving the community since 1926"*

#### HEADQUARTERS

4410 Cathedral Oaks Road  
Santa Barbara, CA 93110-1042  
(805) 681-5500 FAX: (805) 681-5563

Mark A. Hartwig  
Fire Chief  
County Fire Warden

Rob Heckman  
Deputy Fire Chief  
Administration

Anthony Stornetta  
Deputy Fire Chief  
Operations

January 23, 2023

Dana Eady  
Planning Division Manager  
Community Development Department  
City of Santa Maria  
110 South Pine Street, Room 101  
Santa Maria, CA 93458

#### **RE: Richards Ranch Annexation to the City of Santa Maria Draft Environmental Impact Report (DEIR)**

Dear Ms. Eady:

Thank you for the opportunity to review the DEIR for the Richards Ranch Annexation Project. The Santa Barbara County Fire Department offers (SBCFD) the following comments.

The proposed annexation would remove four parcels from the Santa Barbara County Fire Protection District. These parcels are currently served by SBCFD Fire Station 21, located at 335 Union Avenue in Orcutt (1.5 miles away), and SBCFD Fire Station 26, located at 1600 Tiffany Park Court, Orcutt (3 miles away). The two closest Santa Maria City Fire Department (SMFD) fire stations are Fire Station 4 (3 miles away) and Fire Station 2 (3.4 miles away). Both fire departments recently completed Standards of Cover (SOC) studies in 2021. The SBCFD SOC identified the proposed project area as being within the NFPA-recommended 4:00-minute first-due response time from SBCFD Fire Station 21. Conversely, the SMFD SOC shows the project area to be outside the 4:00-minute first-due response time from any SMFD fire station.

The SBCFD SOC identified the need for a third fire station in the north end of the Orcutt community to reduce response times and provide adequate staffing for incidents requiring a multi-company response (structure fires, wildland fires, etc.). SBCFD has purchased a 4.6-acre lot on Union Valley Parkway, 0.4 miles east of the proposed annexation project. This lot is intended to be the site of the proposed SBCFD Fire Station 25. This proposed station will provide significantly reduced response times to both the proposed project area and the unincorporated neighborhoods to the north between Hwy 101 and Hwy 135. The addition of Fire Station 25 is the highest-priority fire station addition project for SBCFD. Furthermore, an Initial CEQA review has been completed for the site, and a public workshop for the surrounding neighborhoods. There is broad support for the new station.

*Serving the cities of Buellton, Goleta, and Solvang, and the Communities of Casmalia, Cuyama, Gaviota, Hope Ranch, Los Alamos, Los Olivos, Mission Canyon, Mission Hills, Orcutt, Santa Maria, Sisquoc, and Vandenberg Village*

SBCFD-1

The SMFD SOC did not identify a need to locate a future SMFD fire station any closer to the proposed project site and assumed fire protection service in this area would continue to be provided by SBCFD.

As of 2022, all SBCFD engine companies are now staffed with paramedics and provide Advanced Life Support (ALS), in contrast to SMFD engine companies staffed with EMT's that provide Basic Life Support (BLS). Stations 21 and 26 provide this expanded level of service to the proposed project site's location and Station 25 once built and staffed.

The SBCFD recommended in the comment provided for the NOP that the proposed project EIR refer to both the SBCFD SOC and the SMFD SOC documents when analyzing impacts on Public Safety. In discussions with City Planning Staff and the SMFD Fire Chief, we stressed the need to analyze response travel times to the project site from existing SMFD and SBCFD fire stations. In both SOC documents, the proposed project site is well outside the recommended 4-minute initial response unit travel time for both SMFD Station 4 and SMFD station 2. Conversely, SBCFD Station 21 is within the 4-minute response time currently. Once operational, Station 25 will provide significantly improved response time to the project site over all other existing fire stations, including SMFD Station 6, which is currently only staffed to provide ARFF service to the Santa Maria Airport. In those discussions, it was made clear by SMFD that there were no plans at the time to build additional SMFD fire stations in the south end of the city and no plans to staff Station 6 with an engine company. The SMFD SOC assumed that SBCFD would continue to provide coverage to the far south portion of Santa Maria City, given the need for SBCFD to provide response coverage to the unincorporated Orcutt triangle area north of Union Valley Parkway. In contrast, the SMFD did recommend additional response unit staffing at SMFD Station 2, given the current call load and anticipated new development in that area.

The proposed annexation would remove four parcels from the Santa Barbara County Fire Protection District that are currently providing property tax revenue into the Fire District. The assessed value of these parcels would be expected to increase significantly were any development to occur. The proposed removal of four parcels will substantially impact the SBCFD's ability to build and staff the proposed Fire Station 25. As noted above, Station 25 will provide both ALS service and markedly improved response times to the proposed project site and the surrounding community inside and outside the Santa Maria City limit. Should the SBCFD be unable to fund the construction and staffing of the proposed Fire Station 25, this would represent a significant negative impact on public safety.

At this time the SBCFD does not believe the proposed annexation to be in the best interest of the residents and property owners of the unincorporated Orcutt community. As an alternative, SBCFD recommends that any annexation proposal keep the current parcels within the Santa Barbara County Fire Protection District. There are many instances of this arrangement throughout California, including within Santa Barbara County. Santa Barbara City jurisdiction extends around the Santa Barbara Airport and the adjacent commercial district north of Hollister Avenue. Santa Barbara City elected to keep this area in the Santa Barbara County Fire Protection District given the existing presence of SBCFD fire stations and resources. Keeping the proposed

SBCFD-1  
(cont'd)

SBCFD-2

SBCFD-3

annexation area within the Santa Barbara County Fire Protection District would ensure that fiscal resources are optimized to support staffing Fire Station 25.

↑ SBCFD-3  
I (cont'd)

Thank you again for the opportunity to comment on this proposed project. As always, if you have any questions or require further information, please call me at 805-681-5554 or 805-681-5523

In the interest of life and fire safety,



Rob Heckman  
Deputy Fire Chief  
Santa Barbara County Fire Department

### 1.2.7.4.1 RESPONSE TO LETTER FROM COUNTY OF SANTA BARBARA FIRE DEPARTMENT

Comment No.	Response
SBCFD-1	<p>The comment introduces the letter and provides significant background information regarding the location of fire facilities, response times, and the current conditions related to the SBCFD and the SMFD and the provision of emergency services in the Orcutt community. The comment provides further detail regarding the planned SBCFD, which the letter indicates was an outgrowth of the SBCFD Standards of Cover studies in 2021. The comment indicates that SBCFD has purchased a 4.6-acre lot on UVP, 0.4 miles east of the proposed Richards Ranch project and the lot is intended to be the site of the proposed SBCFD Fire Station 25. It states that this proposed station will provide significantly reduced response times to both the proposed project area and the unincorporated neighborhoods to the north between Hwy 101 and Hwy 135 and that the addition of Fire Station 25 is the highest-priority fire station addition project for SBCFD. Furthermore, the SBCFD indicates that there is broad support for the new station and that the Standards of Cover did not identify a need to locate a future SMFD fire station any closer to the proposed project site and assumed fire protection service in this area would continue to be provided by SBCFD. The comment provides additional background information regarding the conversations that have occurred between SBCFD, City Planning staff, and SMFD.</p> <p>These introductory comments and additional information provide helpful background regarding the current plans of SBCFD and provide a good synopsis of the discussions that have occurred to-date between the various departments. This information provides important context but does not result in any necessary revisions to the EIR. The background information provided by this comment is not in conflict with the information presented in the EIR.</p> <p>Additionally, it should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport. SMFD Station 6 at the Santa Maria Airport location will be fully operational to serve areas of the city and county beyond the airport property in late summer 2024 (SMFD 2024). When fully staffed at Fire Station 6, the SMFD would be more apt to pick up most of the emergency calls and be the first responder to the project site. See also Master Response 1, Public Services – Emergency Services.</p>
SBCFD-2	<p>The comment indicates that the proposed annexation would remove four parcels from the Santa Barbara County Fire Protection District that are currently providing property tax revenue into the Fire District. The comment further states that this removal of this revenue could inhibit the SBCFD's ability to build and staff the proposed Fire Station 25.</p> <p>As part of the annexation process, the City would need to develop a Resolution of Application to Initiate Annexation, including Adoption of a Plan for Services. The Plan for Services would identify how the City and SMFD would serve the project site using available facilities. If the SBLAFCO provides approval of the annexation, the County and City would move to a negotiation process to identify a fair and appropriate Property Tax Sharing Agreement. It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined.</p>
SBCFD-3	<p>The comment indicates that the SBCFD does not believe the proposed annexation to be in the best interest of the residents and property owners of the unincorporated Orcutt community. The comment also proposes that any annexation proposal keep the current parcels within the SBCFD and provides some examples of where this has occurred.</p> <p>This is not a comment on the environmental analysis contained in the EIR; therefore, a response is not necessary.</p> <p>While this is not a comment specifically on the analysis contained in the EIR, this comment may be relevant for consideration in the project approval process. All comments received during the EIR public review process will be made available through their publication in this Final EIR; however, they do not warrant revisions to the EIR or preparation of detailed responses in the Final EIR.</p> <p>Additional information summarizing the EIR's environmental assessment regarding fire and emergency protection services is provided in Master Response 1, Public Services – Emergency Services.</p>

## 1.3 NON-AGENCY ORGANIZATION COMMENT LETTERS AND RESPONSES

The following non-agency organizations have submitted comments on the Draft EIR.

**Table 1.3-1. Non-Agency Organization Comments**

Respondent	Code	Contact Information	Page
<b>Santa Ynez Band of Chumash Indians</b> Letter dated: 01/31/2023	SYBCI	Tribal Elders' Council P.O. Box 517 Santa Ynez, CA 93460 <i>Contact: Crystal Mendoza, Administrative Assistant   Cultural Resources</i>	1.3-3
<b>Santa Barbara County Action Network</b> Letter dated: 03/07/2023	SBCAN	P.O. Box 6174 Santa Maria, CA 93456 <i>Contact: Ken Hough, Executive Director</i>	1.3-5
<b>Urban Planning Concepts, Inc.</b> Letter dated: 03/07/2023	UPC	2624 Airpark Drive Santa Maria, CA 93455 <i>Contact: Laurie Tamura, AICP, Principal Planner</i>	1.3-7



*This page intentionally left blank.*

### 1.3.1 Santa Ynez Band of Chumash Indians



*Santa Ynez Band of Chumash Indians  
Tribal Elders' Council*

*P.O. Box 517 ♦ Santa Ynez ♦ CA ♦ 93460  
Phone: (805)688-7997 ♦ Fax: (805)688-9578*

January 31, 2023

City of Santa Maria  
Community Development  
110 S. Pine Street #101  
Santa Maria, Ca 93458

Att.: Dana Eady, Planning Division Manager

Re: Richard Annexation Project (SN2021-0001), Notice of Availability and EIR

Dear Ms. Eady:

Thank you for contacting the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians.

At this time, the Elders' Council requests no further consultation on this project; however, if supplementary literature reveals additional information, or if the scope of the work changes, we kindly ask to be notified.

If you decide to have the presence of a Native American monitor in place during ground disturbance to assure that any cultural items unearthed be identified as quickly as possible, please contact our office or Chumash of the project area.

Thank you for remembering that at one time our ancestors walked this sacred land.

Sincerely Yours,

*Crystal Mendoza*

Crystal Mendoza  
Administrative Assistant | Cultural Resources  
Santa Ynez Band of Chumash Indians | Tribal Hall  
(805) 325-5537  
cmendoza@chumash.gov

SYBCI-1

### **1.3.1.1      *Response to Letter from Santa Ynez Band of Chumash Indians***

<b>Comment No.</b>	<b>Response</b>
SYBCI-1	<p>The comment expresses appreciation to the City for including the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians in the notification process and indicates that the Elders' Council requests no further consultation on the project. It also indicates that the Elders' Council can be contacted for Native American monitoring during ground disturbance and if any cultural items are unearthed.</p> <p>The comment does not provide any specific feedback on the EIR; a response is not necessary.</p>

## 1.3.2 Santa Barbara County Action Network



March 7, 2023

**Board of Directors**

Dick Flacks

*Co-President South*

*Co-President North*

Rebecca August

Gale McNeeley, *Secretary*

Jonathan Abboud, *Treasurer*

Janet Blevins

Carla Frisk

Lawanda Lyons-Pruitt

Jaime Tinoco

Alhan Diaz-Correa

Stanley Tzankov

RE: Richards Ranch Annexation Draft Environmental Impact Report

Dear Dana Eady,

Santa Barbara County Action Network (SBCAN) appreciates the opportunity to comment on this matter. For 21 years SBCAN has advocated for environmental, economic, and social justice, as well as holistic planning and sustainable community development. After hosting a roundtable discussion about this topic and attending community meetings, the SBCAN Board and several of our members have concerns about this proposed annexation.

We understand that this land will be developed, as has been planned in the Orcutt Community Plan. SBCAN is not opposed to development on this site. However, we have environmental concerns about increased greenhouse gas emissions from the increased traffic, and the loss of mature eucalyptus trees and monarch butterfly habitat.

SBCAN-1

**Executive Director**

Ken Hough

**Associate Director**

Jeanne Sparks

**Advocacy & Events Director**

Nadia Lee Abushanab

We also share the concerns raised in the Local Agency Formation Commission (LAFCO) staff report for their March 2<sup>nd</sup> meeting about the confusion of having several different service providers and being inconsistent from the rest of the Orcutt community. We believe these parcels should not be annexed into the City of Santa Maria and should instead remain in the County and be developed under County jurisdiction.

SBCAN-2

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Hough".

Ken Hough,  
Executive Director

**SBCAN**

P.O. Box 6174

Santa Maria, CA 93456

805.563.0463

[ken@sbcancan.org](mailto:ken@sbcancan.org)

[www.sbcancan.org](http://www.sbcancan.org)

[Facebook.com/SBCANorg](https://www.facebook.com/SBCANorg)

### 1.3.2.1 **Response to Letter from Santa Barbara County Action Network**

Comment No.	Response
SBCAN-1	<p>The comment expresses that the Santa Barbara County Action Network (SBCAN) appreciates the opportunity to comment on the EIR for the project and provides an introduction to SBCAN. Further, the comment indicates that the organization held a roundtable discussion about the project and has attended community meetings. Lastly, this comment states that the SBCAN Board and several of the organization's members have concerns about the proposed annexation.</p> <p>Because this introductory comment does not contain comments on the EIR, no response is necessary.</p>
SBCAN-2	<p>The comment indicates that SBCAN knows that the site has been planned for development and indicates that SBCAN is not opposed to development on this site. However, SBCAN is concerned with the environmental effects of development, such as increased greenhouse gas emissions, the loss of eucalyptus trees, and monarch butterfly habitat.</p> <p>The environmental issues areas noted by the comment have been addressed by the environmental analyses in the EIR. The commenter does not raise specific questions or concerns regarding how the information is presented in the EIR; therefore, a specific response is not necessary. All comments received during the EIR public review process will be made available through their publication in this Final EIR and can be considered by the City and agency decision-makers that would be required to approve the annexation.</p>
SBCAN-3	<p>The commenter expresses that they share the concerns raised in the SBLAFCO staff report for their March 2nd meeting about the confusion of having several different service providers and being inconsistent from the rest of the Orcutt community. Further, SBCAN indicates they believe these parcels should not be annexed into the City of Santa Maria.</p> <p>These comments are not regarding the environmental analysis contained in the EIR; rather indicate a preference regarding whether the project site should be annexed into the City of Santa Maria. No response is necessary. However, it should be noted that SBLAFCO provided a comment letter on the EIR, for which responses are provided in Chapter 1.2.5. Further, all comments received during the EIR public review process will be made available through their publication in this Final EIR and can be considered by the City and agency decision-makers that would be required to approve the annexation.</p>

### 1.3.3 Urban Planning Concepts, Inc.



March 7, 2023

Dana Eddy, Planning Manager  
Community Development Department  
110 South Pine Street  
Santa Maria, Ca. 93454

RE: Richards Ranch Draft Environmental Impact Report  
Public Comment Letter

Dear Mrs. Eddy:

We have reviewed the Draft Environmental Impact Report for the Richard Ranch project. For the most part this document is very thorough review of the environmental issues related to this project. Please see the following comments and hopefully you will agree that these items should be addressed in the revised EIR.

UPC-1

Page	Para	Comment
<b>Summary</b>		
S-1	Para 2	delete "located adjacent to the northwestern boundary in the County of Santa Barbara"
S-2	Para 2	Please add this additional information: The Bud + Ebba Richard family owned this property with the house and support buildings for over 50 years. After they passed away in the early 2000's, Wal-Mart purchased the property in 2003 with the intent to build a super store. These plans were abandoned after the City of Santa Maria would not provide supplemental water to this site and the super store program was discontinued by Wal-Mart.
S-11	Energy	Central Coast Community Energy (CCCE) as the energy source for this area but should include PG&E for the delivery and installation of the electrical lines
S-32	Alt 2	Throughout the EIR the project commercial square footage lists various project commercial sq. ft. the applicant is proposing 106,000SF. Alternative 2 - 134,096. Diff - +28,096. Not 9,346 sf.  In some sections in the EIR has reviewed 160,000 SF of commercial. This should be corrected or noted as the worst-case square footage.

UPC-2

UPC-3

UPC-4

UPC-5

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 2

2.0 Project Description			
2-1	Para 3	Delete “adjacent to the northwest boundary”	IUPC-6
2-1	Para 5	Add... “has been farmed periodically and disked for fire control ”	IUPC-7
2-1	Para 6	C-2 does allow Mixed Use with a ratio of 2 bedrooms per every 1,000 feet of commercial space. Add this to this paragraph.	IUPC-8
2-3	Figure 2	Show City of Santa Maria boundary on this exhibit. Also refer to OCP EIR 1997 and UVP EIR	IUPC-9
2-4	Para 1	City Ordinance allows mixed use housing in PD/C-2 zones	IUPC-10
2-4	Table 2-1	Access- Dancer Avenue stubs to this site (not proposed for vehicular access to the project only emergency access)	IUPC-11
2-4	Para 3	To that east is the Northpoint and Mariposa townhome projects with their designated open space and recreations amenities. The open space was required based on the Orcutt plan 1,500 foot wide clear area for the airport. In the 1997 OCP this area has been identified as Union Valley Park. This Park has yet to be developed.	IUPC-12
2-4	Para 5	Revise this paragraph to reflect the newly adopted 2023 ALUC plan.	IUPC-13
2-5	Para 3	Expand description as written for dry farming agricultural uses over the years. Add the paragraph about Walmart ownership 2003-2021 in this paragraph. This is an important fact as this commercial was not provided water by the city.	IUPC-14
2-7	Table 2-2	General Plan Change and Pre-Zoning	IUPC-15
2-8	Para 1	—P-O zone allows for residential and mixed-use in the city of Santa Maria zoning ordinance	IUPC-16
	Table 2-3	The commercial buildout number in the paragraph above states 160,800 SF worst case but in the table is 106,800 SF as proposed by the Applicant. Make it clear that the project review was on the proposed project.	IUPC-17
2-9	Figure 3	Needs to be updated this figure -no connection to Dancer Avenue	IUPC-18
2-10	Table 2-4	Need to provide details about Dancer Avenue	IUPC-19
2-11	Table 2.5 Para 2	Table 2.5 states the size of the utilities for LCSD have been determined as noted in the Table. The water service lines within the project have been determined. The first sentence in the paragraph should be deleted as this infrastructure information is known.	IUPC-20
3.0 Environmental Setting			
3-1	Para 3	Change this sentence like others ..project located in Santa Barbara County	IUPC-21
3-1	Para 5	..uses included sheds, barn and routine farming and disking in the past. Also include the reference to Walmart ownership.	IUPC-22
3-2	Para 4	The OCP and EIR should be included in this bullet list. Delete 1993 ALUP and add 2023 ALUP. Include RHNA numbers 6 <sup>th</sup> Cycle	IUPC-23
4.1 Aesthetic			
4.1.1	Para 3	Change first sentence “urban/suburban infill” project versus rural	IUPC-24
	Para 4	Periodic agricultural operations over the last 25 years.	IUPC-25

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 3

4.1-2	Table 4.1-1	Add a column with the photo labels "Figure "	UPC-26
4.1-14	Para 2, 3, 4	ALUC standards update to the newly adopted 2023 ALUP. This project is consistent with the new Zone 2 and Zone 4 standards. These paragraphs need to revise and reflect the new standard.	UPC-27
4.1-15	Para 1		
4.1-18	Para 1	OCP designation land use designation C-2/office professional with approximately 100,000 SF. with residential for 115 units.	UPC-28
4.1-19	Para 1	Revise this paragraph to reflect the newly 2023 ALUP. Include Dark Sky compliant lighting Gateway policies? KS-26 policies and development standards.	UPC-29
<b>4.2 Air Quality and Greenhouse Gas Emissions</b>			
4.2-5	Para 5,6	This whole Paragraph on Diesel seems dated and should be deleted or updated on new CARB standards. CARB is requiring diesel trucks to convert to alternative fuels or electric by 2035	UPC-30
4.2-6	Whole Page	All of these items are very dated. Has there been	UPC-31
4.2-7	Whole Page	Please provide updated information about how these chemicals have been regulated and reduced.	UPC-32
4.2-8		What is the current standards and programs for these reductions	UPC-33
4.2-10	Page 1	Were these exceedances as a result of wildfires in the region?	UPC-34
4.2-14	Para 2	Should update this paragraph based on 2023 snowfalls and change in the water inventory for the foreseeable future.	UPC-35
4.2-23	Para 1 Local	Air Quality Plan should be referenced here. SBCAG RTP/SCS should be included which encourages infill mixed use development.	UPC-36
4.2-27	Para 2	Construction to start in 2024 through 2027.	UPC-37
4.2-33		160,800 worst case vs. 106,000 as proposed by the applicant	UPC-38
	Table 4.2-8	Note in this table that the air quality impacts will be less if 106,000 SF is built.	UPC-39
4.2-36	Para 1,4	Revise this section to note that Natural Gas lines are in the area and will be provided for the commercial sites. No gas lines will be provided for the residential buildings.	UPC-40
4.2-37	GHG/mm 2	Para 1 please note that there are gas lines in the area and will be provided for the commercial buildings. GHG/mm2 revise this mitigation measure to allow natural Gas for the commercial buildings	UPC-41
<b>4.3 Biology</b>			
4.3-30	BIO/mm-5.1	Since all of the trees on the site are to be removed, please amend this mitigation measure by deleting the sentence "If bats are found to be roosting in the project area, the developer shall develop the project in such a way that avoids the bat roost".	UPC-42
4.3-30	Para 1	Please note that there are no public parks in this project. There is common open space/landscaped amenities and community center with pool and recreational amenities in the apartment portion of the project. for clarities note that these are private parks within the project.	UPC-43
4.3-35	BIO/mm 11.1	This mitigation measure needs to be revised. The city has never considered eucalyptus trees as a protected tree. they have been removed throughout the	UPC-44



Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 4

		city because they are a hazard particularly when they are over 100 years old. As proposed, all of the trees existing on this site will be removed. So no eucalyptus or other trees will be protected in place or require protection or fencing. There is no need for a tree protection plan.	
		The mitigation measure should be revised to focus on replanting trees on site and providing compensating trees "in lieu fee" for the city Parks Department. This is the standard that has been used for many projects in the city.	UPC-44 (cont'd)
		Please revise this mitigation measure to reflect what is being proposed for this project.	
4.3-36	Bullets	Add Santa Maria Airport projects in this list.	UPC-45
<b>4.4 Cultural Resources</b>			
4.4-4	Delete fourth dot	...Remove this one Newlove House was not in old Orcutt. It was moved from the City of Santa Maria to the Firestone Ranch. The schoolhouse was n move to Buellton	UPC-46
4.4-5	Para 1	Typo "the" instead of "he"	UPC-47
<b>4.5 Energy</b>			
4.5-3	Para 4	PG&E does not provide natural gas in Santa Maria and Orcutt. Southern California Gas Comp provide natural gas. Please correct.	UPC-48
4.5-11	Para 3	131,000 versus 106,000 proposed by the applicant	UPC-49
4.5-12	Table 4.5-3	Does this table include natural gas for the residential units? Natural gas use for apartments and townhomes. Should provide additional Table 4.5-3a to show with and without natural gas for the residential units with increase in electrical use. Should have natural gas provided for the commercial uses.	UPC-50
4.5-13	EN/mm1.1	All buildings will be connected to 3CE but the commercial area will have access to natural gas for the commercial buildings.	UPC-51
<b>Geology and Soils</b>			
4.6-2	Para 1	Provide soil type descriptions, Agricultural classification	UPC-52
4.6-4	Para 3	The Figure 4.6-2 shows the Santa Maria and Casmalia faults are closer, why are they not discussed here?	UPC-53
4.6-25	GEO/mm9.1	<b>Delete this Mitigation Measure.</b> It should be noted that most grading for the site will not be more than 6 to 8 feet deep. The UVP/Orcutt frontage road did not find any resource on the road sections. No project in the Orcutt area including Rice Ranch or Santa Maria have ever had to do a paleontology study on their property. This is an added cost for something that does not exist. Delete all reference to this Mitigation measure in the rest of the document.	UPC-54
<b>4.7 Hazards and Haz Mat</b>			
4.7-1	Para 2	Multifamily North Point and Mariposa development to the east	UPC-55
4.7-1	Para 4	Row crops, dry farming on this site over 50 years when the Richards owned the property.	UPC-56

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 5

		Richard house and accessory ag structures located in the southwest for over 50 years.	UPC-56 (cont'd)
		Northpoint project was developed in 1979 and Mariposa was built in 2000.	
4.7-2	Para 5	Casmalia water facility has been closed for over 15-20 years and is a cleanup site by the Super fund through the EPA.– no hazardous water is being hauled to this site	UPC-57
4.7-3	Para 2	Idle wells are defined as “drilled oil wells that are no longer in production but have not been abandoned.”	UPC-58
4.7-4	Para 3 and 4	These sections need to be updated to reflect the recently adopted 2023 ALUP	UPC-59
4.7-5	Figure 4.7-1	Delete this old exhibit or if you keep it you should add the 1500 foot wide Orcutt Plan clear zone measure which shows how previous developments were designed around the clear zone.	UPC-60
4.7-7	Figure 4.7-2	OCP no build zone should be added to this exhibit for context. Label this as the Final 2023 ALUP exhibit. Also, the Zone 2 does not look right. Please confirm with final ALUP map.	UPC-61
4.7-15		Should be deleted	UPC-62
4.7-16		Should be deleted	UPC-63
4.7-17		Should be deleted	UPC-64
4.7-21	HAZmm-2.1	Delete reference to UVP as it has only been operational for the last 10 years. This test should only be needed along 135. Revise this Mitigation Measure	UPC-65
4.7-23		Update this section on new ALUP versus the old one.	UPC-66
4.7-25	Para 2	Remove reference to 1993 ALUP.	UPC-67
<b>4.8 Hydrology and Water Quality</b>			
4.8-13	Para 1	Water calculates – City vs. County. This calculation should also include the recharge to the Ground water basin through LCSD recharge. Normally 25% credit is allowed.  The agreements of water service with Golden State Water company already exists so this last sentence should be deleted.	UPC-68
<b>4.9 Land Use and Planning</b>			
4.9-5		Should add CPO zoning designation as another city zoning designation.	UPC-69
4.9-7	Figure 4.9-2	The section of this EIR states that the SOI zoning for this site is Commercial but this exhibit shows that it is CPO	UPC-70
4.9-8	1 and 5	2022 ALUP plan has been approved this page needs to update.	UPC-71
4.9-12	Para 1	This Paragraph need to be deleted	UPC-72
4.9-14	1	131,000 versus 106,000	UPC-73
4.9-13, 14	Table 4.9-4	The new 2022 ALUP has been approved land use density should be discussed here. The tables should be consistent with the Hazard section.	UPC-74
4.9-16	Para 5	The City of Santa Maria General Plan update to be completed in 2024	UPC-75
4.9-18	Ob-I.U.1b	Change 96,000 to 106,000 SF commercial	UPC-76
4.9-20	Ob-LU2c	Change 96,000 to 106,000 SF commercial	UPC-77

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 6

	OB-LU2d Ob-LU2 g		UPC-77 (cont'd)
		All policies about the 1993 ALUP should be amended to reflect the 2023 ALUP	UPC-78
4.9-21	Ob-C.1.a2	Regional improvements Hummel Drive signal planned for with the County of Santa Barbara	UPC-79
4.9-22		Imp prog 1 signalization of Hummel Drive is a regional improvement.	UPC-80
4.9-34	Policy 1.2 Air Quality	There are policy discussions that refer to no natural gas but we want to have natural gas to the commercial buildings. Please revise this discussion.	UPC-81
4.9-37-39		Revise the discussion about the ALUP and refer to only the new 2023 ALUP policies	UPC-82
4.9-44	Para 1	106,000 versus 131,000	UPC-83
<b>4.10 Noise</b>			
4.10-14	Figure 4.10-3	Refer to the updated 2023 ALUP new noise contours.	UPC-84
4.10-17	Table-4.10-7	Exterior noise for residential units has been changed to 75 dBA in the City of Santa Maria Ordinance	UPC-85
4.10-26	Para 2	This wall height should acknowledge the change of elevation changes as part of the noise wall between the commercial development and the existing residential lots. The wall can be 6 to 8 as needed.	UPC-86
4.10-33	NOI/mm-1.2 b	This northern wall should be 6 to 8 feet based on the difference in elevation between this site and the existing residential to the north.	UPC-87
4.10-33	NOI/mm 1.2 d	Correct (7:00 am should 10:00 pm to 10:00 pm should 7:00 am) for night time hours.	UPC-88
<b>4.11 Population and Housing</b>			
4.11-1	Para 2	Santa Maria is one of seven cities in the county	UPC-89
4.11-8	Table 4.11-6	This table state a residential total of 1,846. This is inconsistent with many numbers in other section of the document that state 1,346 plus 456 in commercial worker for a total of 1,802. Refer document for correct numbers.	UPC-90
<b>4.12 Public Services and Recreation</b>			
4.12	Para 3	The service calls are around 485 for fires and the rest are backup support for AMR ambulance service. Please correct this as the number 10,868 appears to indicate that they are all fire call in the City of Santa Maria	UPC-91
4.12-4	Para 4	Based on the timing of the buildout of this project through 2024-27, this service upgrade at the Station 6 in Santa Maria and the new Fire Station 25 in Orcutt should be available in the meantime city staff said they would staff accordingly to service the location, but only in times where Orcutt fire trucks are closer would the mutual aid agreement come in to play with SBCFD responding.	UPC-92
4.12-6	Table 4.12-3	The city just entered into agreement for the Area 5B 20-acre regional sports complex and it should be included in this Table. The Waller park acreage should also be included in this table so that it is a good summary of the recreational amenities in the region. The acreage is also 300 in total now.	UPC-93

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 7

4.12-15	Para 5	Should include the Orcutt Library in Old Town Orcutt and the current effort to build or buy a larger Library in the Orcutt area.	UPC-94
4.12-15	Para 3	Should add in this a paragraph that the Building Code now requires all buildings including residential to be fully sprinklered. That is why there are fewer big fires in the newer buildings	UPC-95
4.12-15	Para 4	This paragraph needs to be revised. The Tax Exchanges Agreement between the county and the city needs to be completed before LAFCo will consider the annexation of the project.	UPC-96
4.12-17	Para 1	This number of 13,000 students is wrong as OUSD has 4,133 students and Righetti has 2,467 so there is only 6,600 students in the Orcutt area.	UPC-97
4.12-7	Para 2	This student calculation is worst case as the Richards project is 70% 1,2-, and 3- bedroom apartments and 30% townhomes. This project will generate less students then the experienced with other Orcutt projects. Please note this in this p[paragraph	UPC-98
4.12-18	Para 2	This paragraph should include the current school fees for both districts	UPC-99
4.12-18	Para 3	This paragraph should I include information on the proposed new library being proposed in Orcutt. The county is collecting funding to either purchase an existing building or build a new library.	UPC-100
4.12-19	Para 1	This paragraph should be updated to include the new park the city has agreed to purchase. Noted above.	UPC-101
4.12-19	Para 2	This project will include pocket parks and community center with pol and outdoor recreation to serve the residence of this project. there will not be a dedicate public park with this project. they will be paying Quimby and AB 1600 fees. Amend this paragraph.	UPC-102
<b>4.13 Transportation</b>			
4.13-5	Table 4.13-3 and -4	UVP Bradley is signaled? Why is there a footnote. It should be removed for this intersection.	UPC-103
<b>Utilities and Service Systems</b>			
4.14-2	Fig-4.14-1	This figure should be amended to included Tanglewood State Water line along Black Road along with the interconnects with the City of Santa Maria and existing GSWC wells and storage tanks this is important information for the decision makers and LAFCo	UPC-104
4.14-8	Fig-4.14-4	This figure should include notes on the LCSD plant and property owned by the county and the surrounding agricultural operations for discharge for agricultural uses. Also, this exhibit needs to show the purple lines that have been installed to provide recycled water to the surrounding area including Waller Park. There are some areas of the city that are served by LCSD.	UPC-105
4.14-9	Para 1	User sites include recycled water to Airport District, Waller Park, and Skyway industrial park. There are also contracted recycled water provided to Rancho Maria Golf Course.	UPC-106

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 8

4.14-9	Para 5	This section should include description of the expansion and upgrade being conducted at LCSD now to meet new state laws for treatment and to serve future development in the area. This was a multimillion project.	UPC-107
4.14-20	Para 2	PGE/3CE	UPC-108
4.14-20	Impact 1	Why is Bio /MM's listed in this section	UPC-109
4.14-21		Water supply provided by purchase contract with City of Santa Maria through Golden State Water  131,000 vs. 106,000 This section needs to go through a more explained discussion of City of Santa Maria water supply.	UPC-110
4.14-24	Table 4.14.10	Proposed 106,000 s.f. instead of 131,000	UPC-111
<b>5.0 Alternatives</b>			
5-2	Bullet 8	Revise based on the adopted 2023 LUP	UPC-112
5-19	Table 5-4 Para 4	The commercial sf is noted as 134,096 which is 28,000 sf more then the applicant proposed project . this should be corrected.	UPC-113
5-20	Figure 5.2	Dancer avenue would have to be extended as a full access road to provide through circulation to the project. this would have an adverse impact on the existing Dance and Mooncrest neighborhood. Please make this very clear in this analysis.	UPC-114
5-27	Trans	This section will need to discuss the significant adverse impact on the Dancer Avenue/ Mooncrest neighborhood. This I will be a full access to the residential areas and would add traffic to the existing neighborhood.  This is increased adverse impact on traffic	UPC-115
5-36	Table 5-8	Alternative 3 is the environmentally superior alternative.  Alt 2 must show that transportation will be increased based on the impact to Dancer Avenue.	UPC-116
<b>Other CEQA Consideration</b>			
6.2	Para 5	The signal at Hummel Drive is a county project and funded by AB 1600 fees	UPC-117
6.3	Para 3	This paragraph does not seem to address the setting of this site	UPC-118
6.6	Para 1	What Class level are these soils?	UPC-119
	2	They are not There is agricultural uses to the Northwest on the airport property. Correct this paragraph	UPC-120

Ms. Dana Eddy  
Richards Ranch Comment Letter  
March 7, 2023  
Page 9

Thanks you for your time considering these comments and we will be available to answer any questions you may have in reviewing them

Please note that we do want o proved updated exhibits for the hearing draft EIR.

Sincerely.



Laurie Tamura, AICP  
Principal planner

UPC-121

### 1.3.3.1 Response to Letter from Urban Planning Concepts, Inc.

Comment No.	Response
UPC-1	The comment provides opening remarks to the Urban Planning Concepts, Inc. (UPC) letter. Because this comment does not provide a specific comment on the EIR, no response is necessary.
UPC-2	The comment suggests the removal of “adjacent to the northwestern boundary” from the text in the identified sentence. This revision has been made as suggested.
UPC-3	The comment requests that additional information be provided regarding the history of the Richards Ranch site, including prior ownership and use. The requested additional information has not been added to the EIR. The City does not have verification and/or a citation for this information and it is not important for the environmental analysis contained in the EIR. However, all comments received during the EIR public review process will be made available through their publication in this Final EIR and decision-makers can consider if this information is relevant to their consideration of the project and its potential approval.
UPC-4	The comment suggests adding reference to PG&E for the delivery and installation of electrical lines. This suggestion has been added to the language in Mitigation Measure EN/mm-1.1.
UPC-5	The comment points to inconsistencies with the project’s identified square footage for commercial uses. The analyses contained in the EIR consider a maximum buildout of 106,800 square feet of commercial uses and a 39,500–square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project’s commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that did not correctly reference 106,800 square feet of commercial development were typographical errors. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.
UPC-6	The comment suggests the removal of “adjacent to the northwestern boundary” from the text in the identified sentence. This revision has been made as suggested.
UPC-7	The comment suggests adding “has been farmed periodically and disked for fire control” to the text as identified. This revision has been made as suggested.
UPC-8	The comment suggests correction to the allowable residential uses in the C-2 zoning designation. A correction has been made to the EIR in this paragraph to clarify that residential uses can be allowed in the C-2 zone under certain circumstances. Specifically, the Santa Barbara County C-2 zone allows for mixed use projects with a Minor Conditional Use Permit if the residential use is secondary to the principal commercial use on the same lot (Santa Barbara County Code, 35.42.200).
UPC-9	The comment requests the addition of the City of Santa Maria jurisdictional boundary of Figure 2-2. Refer to Figure 2-1 of the EIR which shows the City of Santa Maria’s jurisdictional boundary, the Sphere of Influence, as well as the project site boundary. No further edits to this figure are necessary.
UPC-10	The comment notes that the City Ordinance allows mixed use housing in PD/C-2 zones. The comment has been noted. No revisions to the text have been made as this discussion is referring to the land use designation and not the zoning designation. Because the project site is not currently within the City limits, it does not have a zoning designation from the City. For this reason, it would not be appropriate to make any suggested revisions.
UPC-11	The comment requests the addition of Dancer Avenue to the “Access” row in Table 2-1, with the distinction that it is for emergency access only. This revision has been made as suggested.
UPC-12	The comment suggests addition clarification to the discussion on existing land uses to the east of the project site, specifically adding mention of the Northpoint and Mariposa townhomes and their associated open space and recreational amenities. This clarification has been added as suggested.

Comment No.	Response
UPC-13	<p>The comment notes that that the Santa Barbara County Association of Governments (SBCAG) adopted the Santa Maria Airport Land Use Compatibility Plan (ALUCP) in January 2023 and that the discussion should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the adoption of the Santa Maria ALUCP.</p>
UPC-14	<p>The comment requests that the description be expanded to indicate that dry farming agricultural uses have occurred over the years and that there should be additional information about Walmart ownership in this paragraph.</p> <p>Text has been added in this location to indicate that the site was previously used for dry farming purposes. The request for additional information about the ownership history has not been added to the EIR as it is not important for the environmental analysis contained in the EIR. However, all comments received during the EIR public review process will be made available through their publication in this Final EIR and decision-makers can consider if this information is relevant to their consideration of the project and its potential approval.</p>
UPC-15	<p>The comment suggests adding "General Plan" land use designation along with the pre-zoning designation in the title.</p> <p>This clarification has been made.</p>
UPC-16	<p>The comment requests the additional clarification that the City's Professional Office land use designation allows for mixed use, including residential uses.</p> <p>This clarification has been added.</p>
UPC-17	<p>The comment points to inconsistencies with the project's identified square footage for commercial uses.</p> <p>The analyses contained in the EIR consider a maximum buildout of 106,800 square feet of commercial uses and a 39,500-square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that that did not correctly reference 106,800 square feet of commercial development were typographical errors. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.</p>
UPC-18	<p>The comment clarifies that the project would not connect to Dancer Avenue or be able to be accessed from Dancer Avenue.</p> <p>Figure 2-3 has been revised to show that Dancer would not provide through access to the south of the project site.</p>
UPC-19	<p>The comment requests additional details about Dancer Avenue be added to Table 2-4.</p> <p>Table 2-4 is meant to describe roadway and transportation improvements associated with the project. Since the project does not propose access to and from the site via Dancer Avenue, it would not be appropriate to add it to this table. A clarification sentence has been added in the text above the table to acknowledge Dancer Avenue and its use for emergency access only.</p>
UPC-20	<p>The comment states that the size of necessary water infrastructure improvements (i.e., water service lines) is known and to delete reference to this information being unknown.</p> <p>This revision has been made as suggested.</p>
UPC-21	<p>The comment suggests the removal of "adjacent to the northwestern boundary" from the text in the identified sentence.</p> <p>This revision has been made as suggested.</p>
UPC-22	<p>The comment requests that additional text be added to reference prior land uses and disking. In addition, reference to Walmart ownership is requested.</p> <p>Some additional information has been added to the EIR in response to this comment. The request for additional information about the ownership history has not been added to the EIR as it is not important for the environmental analysis contained in the EIR. However, all comments received during the EIR public review process will be made available through their publication in this Final EIR and decision-makers can consider if this information is relevant to their consideration of the project and its potential approval.</p>



Comment No.	Response
UPC-23	<p>The comment indicates that the OCP and its EIR should be included in the bullet list under regulatory setting. In addition, the comment asks that the 1993 Airport Land Use Plan (ALUP) be deleted and replaced with the adopted 2023 plan. Lastly, the comment requests that the numbers from the 6<sup>th</sup> Cycle Regional Housing Needs Allocation (RHNA) should be included as well.</p> <p>This listing is intended to summarize the plans that would apply to the project if it were to be approved for development in the City. The OCP and its EIR are not within the regulatory context of the City of Santa Maria; thus, they have not been added to this list since. Further, the City's 6<sup>th</sup> Cycle RHNA does not include the Richards Ranch site in its estimate of future housing units (i.e., the City's 6<sup>th</sup> Cycle Housing Element does not presume annexation of the Richards Ranch site). The listing has been corrected to remove reference to the 1993 ALUP and update the reference to the ALUCP (which was adopted in 2023).</p>
UPC-24	<p>The comment suggests changing the term "rural" to "urban/suburban infill" in the following sentence:  "The project site is in an area that visually transitions from a more rural setting in the south to a more developed area of the city in the north."</p> <p>The comment has been noted; however, no changes have been made to the text. This sentence describes the transition in visual character in a broader context than the immediate project site and surrounding area. Changing this term would not be appropriate in this sentence.</p>
UPC-25	<p>The comment requests the addition of "periodic agricultural operations" be added to the text describing existing conditions in Chapter 4.1, Aesthetics.</p> <p>This revision has been made as suggested.</p>
UPC-26	<p>The comment asks for the addition of a column in Table 4.1-1 to add figure numbers.</p> <p>This column has been added as suggested.</p>
UPC-27	<p>The comment notes that the SBCAG adopted the Santa Maria ALUCP in January 2023 and that the discussion within the Aesthetics regulatory setting section should be revised accordingly.</p> <p>These revisions have been made to reflect the Santa Maria ALUCP, which was adopted in 2023.</p>
UPC-28	<p>The comment suggests adding square footage and residential unit details allowable by the OCP land use designation to this discussion.</p> <p>The comment has been noted; however, no changes have been made to the text as this detail is not necessary for the impact discussion and would not change the significance determination.</p>
UPC-29	<p>The comment notes that the SBCAG adopted the Santa Maria ALUCP in January 2023 and that the discussion within the Aesthetics impact analysis section pertaining to lighting and glare should be revised accordingly. The comment also suggests addressing Dark Sky compliant lighting requirements and KS-26 policies and development standards.</p> <p>These revisions have been made to reflect the adopted Santa Maria ALUCP. The City of Santa Maria does not have Dark Sky compliant lighting requirements in its Municipal Code and the OCP KS-26 policies and development standards would not apply to the project if annexation of the project site were to occur into the City of Santa Maria. However, as stated in Section 4.1.5, AES Impact 4, the project would be required to be designed in accordance with lighting and glare requirements set forth in the City's Municipal Code as listed in Section 4.1.2. In addition, as stated in the EIR, the project would also be subject to applicable standards and regulations set forth in the ALUCP as well as policies established by the FAA and advisory circulars.</p>
UPC-30	<p>The comment indicates that the information on diesel seems dated and should be deleted or updated on new CARB standards.</p> <p>This section of the report provides a summary/historical overview of toxic air contaminants, including DPM, and their associated effects on public health and welfare. Applicable standards and regulations pertaining to air pollutants and emissions sources, including on-road and off-road vehicles and fuels, such as Executive Order No. N-79-20 which restricts new internal combustion vehicles, are discussed in the Regulatory Setting section of Section 4.2, Air Quality and Greenhouse Gas Emissions, beginning on page 4.2-14 of the EIR.</p>
UPC-31	<p>Again, the comment indicates that the information seems dated.</p> <p>Refer to response to comment UPC-30.</p>
UPC-32	<p>The comment indicates that the commenter feels that updated information about how these chemicals have been regulated and reduced should be included.</p> <p>Refer to Response to Comment UPC-30. As noted above, applicable standards and regulations pertaining to air pollutants, including toxic air contaminants, are discussed in the Regulatory Setting section of Section 4.2, Air Quality and Greenhouse Gas Emissions, beginning on page 4.2-14 of the EIR.</p>

Comment No.	Response
UPC-33	The comment asks what the current standards and programs are for these reductions. Refer to the Regulatory Setting section of Section 4.2, Air Quality and Greenhouse Gas Emissions, beginning on page 4.2-14 of the EIR.
UPC-34	The commenter asks whether the exceedances noted on page 4.2-10 of the EIR were as a result of wildfires in the region. Wildfires can, on occasion, influence ambient air quality. However, data from the stations provided by the EPA show that no "exceptional events," such as wildland fires, were identified during the period indicated.
UPC-35	The comment requests that the paragraph be updated based on 2023 snowfalls and change in the water inventory for the foreseeable future. The comment has been noted. However, a single year of increased snowfall does not alter the trends discussed in the paragraph.
UPC-36	The comment requests that page 4.2-23 include a reference to the Air Quality Plan and the local SBCAG RTP/SCS. These references have been added to the Regulatory Setting in Section 4.2.2.3. It should be noted as of 2016 the SBCAPCD updated the Air Quality Plan to be referred to as the Ozone Plan.
UPC-37	The commenter indicates that construction is anticipated to occur between 2024 and 2027. The Project Description has been updated to indicate that construction would begin in 2025, which is an estimate provided by the Applicant based on the status of the proposed project and approvals that have not yet occurred and would continue to be required before the project proceeds. Air quality modeling was conducted based on information provided and the unknown timing of construction is mentioned in the paragraph. Given that on-road and off-road fleet emissions are projected to gradually improve in future years, the analysis is considered conservative.
UPC-38	The comment questions the assumed square footage that has been analyzed in the EIR environmental analysis. The text of the EIR has been corrected to reflect that the EIR analyzes a maximum buildout of 106,800 square feet of commercial uses and a 39,500–square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR.
UPC-39	The comment states that the air quality impacts reflected in Table 4.2-8, Operational GHG Emissions would be less if 106,000 square feet were to be built versus 160,800. The air quality and greenhouse gas analyses did not assume 160,800 square feet of commercial development, as incorrectly stated in the Draft EIR. This was a typographical error and has been corrected.
UPC-40	The comment requests that the section be revised to accommodate natural gas to the commercial sites. Mitigation Measure GHG/mm-2.2 has been revised to retain the prohibition of the installation of natural gas infrastructure for proposed residential development. However, an alternative mitigation has been provided in response to this comment to allow for natural gas at the commercial land uses.
UPC-41	The commenter requests that Mitigation Measure GHG/mm-2.2 be revised to allow natural gas for the commercial buildings. This request has been considered by the City and the EIR air quality and GHG consultant, and it has been determined that equivalent mitigation can be provided that would address and compensate for the potential impact of natural gas use at the commercial sites. As a result, Mitigation Measure GHG/mm-2.2 has been revised as follows: <b>GHG/mm-2.2</b> The servicing of residential development by natural gas shall be prohibited. Natural gas service for commercial development shall only be allowed if the following measures are implemented: a. The electrical systems for commercial land uses shall be designed with sufficient capacity and all prewiring necessary to accommodate the future retrofit to all-electric (e.g., such that electric space heating, water heating, and cooking appliances could be installed). b. A GHG-reduction plan shall be prepared and implemented. The GHG-reduction plan shall identify additional on-site and/or off-site GHG-reduction measures to be implemented sufficient to fully offset GHG emissions associated with natural gas service to commercial land uses. The GHG-reduction plan shall be submitted to City planning staff for review and approval prior to issuance of building construction permits. Under CEQA Guidelines Section 15126.4, subdivisions (c)(3) and (c)(4), respectively, a project's GHG

Comment No.	Response
	<p>emissions can be reduced by off-site measures, including offsets that are not otherwise required and measures that sequester GHGs. If feasible on-site GHG-reduction measures are insufficient to reduce operational GHG emissions to below the GHG threshold of significance, off-site mitigation measures may be included. Off-site mitigation measures may include "Direct Reduction Activities" or the purchase of "Carbon Offset Credits" as discussed below:</p> <p><b><u>Direct Reduction Activities</u></b></p> <p>Directly undertake or fund activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, in accordance with the criteria set forth in the ARB's most recent Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation (2013). GHG reduction credits shall be undertaken for the specific purpose of reduction project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third-party. The "Direct Reduction Activity" shall be registered with an ARB-approved registry and in compliance with ARB-approved protocols. In accordance with the applicable Registry requirements, the project developer (or its designee) shall retain an independent, qualified third-party to confirm the GHG emissions reduction or sequestration achieved by the Direct GHG Reduction Activities against the applicable Registry protocol or methodology. The project developer (or its designee) will then apply for issuance of carbon credits in accordance with the applicable Registry rules.</p> <p><b><u>Carbon Offsets</u></b></p> <p>Obtain and retire "Carbon Offsets." Carbon Offsets shall achieve GHG reductions that are real, permanent, quantifiable, verifiable, and enforceable. Carbon offsets shall be purchased from ARB-approved registries and shall comply with ARB-approved protocols to ensure that offset credits accurately and reliably represent actual emissions reductions. If the purchase of carbon offsets is selected, offsets shall be purchased according to the following order of preference: (1) within the SBAPCD jurisdictional area; (2) within the State of California; then (3) elsewhere in the United States. In the event that a project or program providing offsets to the project developer loses its accreditation, the project developer shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.</p>
UPC-42	<p>The comment requests that a portion of Mitigation Measure BIO/mm-5.1 be removed since the current plan of the Applicant is to remove all of the trees from the site. The sentence that the comment requests removal is: "If bats are found to be roosting in the project area, the developer shall develop the project in such a way that avoids the bat roost."</p> <p>This revision has not been made as it is inappropriate. The measure in-full is provided below:</p> <p><b>BIO/mm-5.1.</b> The developer shall retain a qualified biologist to conduct roosting bat surveys prior to any tree removal. Pre-disturbance surveys for bats shall include two daytime and two dusk surveys no more than 30 days prior to the tree removal to determine if bats are roosting in the trees. The biologist(s) conducting the preconstruction surveys shall identify the nature of the bat utilization of the area (i.e., no roosting, night roost, day roost, maternity roost). If bats are found to be roosting in the project area, the developer shall develop the project in such a way that avoids the bat roost. If avoidance of the bat roost is not feasible, tree removal shall be delayed until the bats have left the area.</p> <p>The revision has not been made since it cannot be pre-determined what is feasible when it comes to tree removal and/or the specific project site plans, since they have not been received and/or processed by the City. Should the annexation and project be approved for development, the City will work with the developer to determine what is feasible and acceptable regarding Mitigation Measure BIO/mm-5.1 should bat roosts be detected.</p>
UPC-43	<p>The comment notes that the Applicant does not intend to develop any public parks.</p> <p>This comment is noted. The language referenced in the EIR does not indicate whether the parks would be public or private. Rather, the language describes that there will be park resources within the developed project site and that landscaping would be required to comply with the City's landscaping standards in the Municipal Code. No revisions to the EIR have been made.</p>

Comment No.	Response
UPC-44	<p>The comment requests a revision to Mitigation Measure BIO/mm-11.1 to focus on replanting trees on site and providing compensating trees as an "in lieu fee" for the City Parks Department.</p> <p>A revision has not been made to the mitigation measure. While the comment implies that the mitigation measure requires tree protection in-place, this is not the case. Instead, the measure in the EIR requires that a City-approved biologist or arborist to "prepare a tree protection, replacement and monitoring program or another mechanism that ensures consistency with RME Goal 3 and Policy 3, and compliance with the City's Municipal Code." As allowed by the mitigation measure, it is recognized that tree replacement will likely be an important element of the tree program that is developed by the City-approved biologist/arborist. The City recognizes the hazard that the eucalyptus trees could pose. However, the required tree plan would be required to demonstrate protection of existing trees the "greatest extent feasible," in accordance with Municipal Code Section 12-44.4. It is recognized that it may not be feasible or desirable to protect the existing eucalyptus trees on site.</p>
UPC-45	<p>The comment requests that Santa Maria Airport Business Park be added to the cumulative projects list in the analysis of cumulative biological resources.</p> <p>The portions of the Santa Maria Airport Business Park project that are proposed for development in the near-term based on the City's Major Developments List have been added to the cumulative project list, both in Chapter 3, Environmental Setting, and in Section 4.3.6 of the biological resources analysis. Specifically, the Santa Maria Airport Foxenwood Self Storage project, which would be a 101,450 square foot mini warehouse facility, would be located at the northwest corner of Highway 135 and UVP. Also, the Planes of Fame Museum, which would be an air museum consisting of two aircraft hangers, would be located at 3335 Corsair Circle. This addition does not change any of the analyses contained in the EIR.</p>
UPC-46	<p>The comment notes an error regarding including the Newlove House in the listing of historical buildings and structures in the OCP area.</p> <p>This revision has been made to this background section of the EIR.</p>
UPC-47	<p>The comment notes a typographical error, which has been corrected in the EIR.</p>
UPC-48	<p>The comment notes that PG&amp;E does not provide natural gas in Santa Maria and Orcutt.</p> <p>The EIR has been revised to reflect this correction.</p>
UPC-49	<p>The comment points to inconsistencies with the project's identified square footage for commercial uses.</p> <p>The analyses contained in the EIR consider a maximum buildout of 106,800 square feet of commercial uses and a 39,500-square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that did not correctly reference 106,800 square feet of commercial development were typographical errors. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.</p>
UPC-50	<p>The comment asks for clarification about what is included in Table 4.5-3, Operational Electricity, Water, and Natural Gas Consumption, and whether additional information should be provided to show the anticipated reduction in energy use after mitigation. Further, the comment requests that natural gas be allowed for the commercial uses.</p> <p>The table referenced by the commenter provides an estimate of energy consumption <u>prior to</u> consideration of the measures included in GHG/mm-2.1 and GHG/mm-2.2, which is estimated as 26,075 annual million British thermal units (MMBTU). Implementation of Mitigation Measures GHG/mm-2.1 and GHG/mm-2.2 would further reduce operational energy consumption, including the prohibited use of natural gas for the proposed residential uses. With implementation of proposed mitigation measures, total annual energy consumption would be reduced to approximately 19,535 MMBTU.</p> <p>The request to allow natural gas for the commercial uses has been considered by the City and the EIR air quality and GHG consultant, and it has been determined that equivalent mitigation can be provided that would address and compensate for the potential impact of natural gas use at the commercial sites. Refer to response to comment UPC-41.</p>
UPC-51	<p>The comment notes that the Applicant is planning for all buildings to be connected to Central Coast Community Energy but that the commercial areas are intended to have natural gas. will have access to natural gas for the commercial buildings.</p> <p>Mitigation Measures EN/mm-1.1 and GHG/mm-2.2 have been revised to reflect this comment. Also, please refer to response to comment UPC-41.</p>
UPC-52	<p>The comment requests that page 4.6-2 include soil type descriptions and agricultural classifications.</p> <p>The descriptions and agricultural classifications for each soil type present on the project site have been added.</p>

Comment No.	Response
UPC-53	<p>The comment requests that page 4.6-4 include a discussion of the Casmalia and Santa Maria faults.</p> <p>Additional information regarding the Casmalia and Santa Maria faults has been added. It has also been clarified that the Los Alamos fault is classified as an active fault, rather than potentially active.</p>
UPC-54	<p>The comment asks for GEO/mm-9.1 to be deleted, indicating the no project in the area has had to do a paleontological study in the past and that no resources were found as a result of road construction that occurred in the area for UVP and the Orcutt frontage road and that no paleontological resources have been found in the project area.</p> <p>The City has considered this comment and will not be deleting the mitigation measure due to the potential for undocumented paleontological resources to occur below the ground surface at the project site. The history of paleontological studies and documented resources is not the only consideration regarding the potential for paleontological resources. The potential exists for resources to be uncovered at the project site due to the underlying formations present. In consideration of this comment and based on consultation with the paleontologist supporting the environmental analysis, the measure can be revised to delete the requirements for a monitoring plan and only require a paleontological monitor during the initial ground disturbance associated with grading of the site. This revision has been made in the Final EIR.</p>
UPC-55	<p>The comment suggests including the specific names of the residential neighborhoods located east of the project site in the general description of surrounding land uses.</p> <p>These neighborhood names have been added into the description of surrounding land uses in Section 4.7.1 of the EIR.</p>
UPC-56	<p>The comment notes that while the records search performed to support the Phase I Environmental Site Assessment for the project did not identify agricultural uses as a historic use of the property, the project site was historically used for row crop cultivation and dry farming at the time the property was owned by the Richards family.</p> <p>Section 4.7.1 of the EIR has been updated with this information.</p>
UPC-57	<p>Section 4.7.1.3 of the EIR identifies several areas of the project region that are more likely to be the site of an accident involving hazardous materials, based on information provided in the City of Santa Maria General Plan Safety Element. The comment notes that while the Casmalia hazardous waste facility is included in this discussion, the status of this facility has changed from an active hazardous waste facility to an inactive facility that is currently undergoing ongoing hazardous waste cleanup efforts after it was identified as a Superfund site by the U.S. EPA in the early 1990s.</p> <p>This section of the EIR has been revised to clarify that the Casmalia hazardous waste facility is a Superfund cleanup site rather than an operating facility. In addition, the approximate distance from this site to the project site was added to provide additional clarification as to the applicability to the project.</p>
UPC-58	<p>The comment notes that the EIR incorrectly defines idle wells as pipelines that are not currently producing but have the potential to be reactivated.</p> <p>Section 4.7.1.4 has been updated to state that idle wells are defined as wells that have not been used for two years or more and has not been properly plugged and abandoned, as defined on the California Department of Conservation Geologic Energy Management (CalGEM) Idle Well Program webpage.</p>
UPC-59	<p>The comment notes that that the SBCAG adopted the Santa Maria ALUCP in January 2023 and that the discussion within Section 4.7.1.8 should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP.</p>
UPC-60	<p>The comment states that Figure 4.7-1 should be deleted as it shows the airport safety zones as reflected in the 1993 Santa Barbara County ALUP, which was just superseded by the adopted Santa Maria ALUCP in January 2023.</p> <p>This figure has been removed from the EIR as the 2023 Santa Maria ALUCP reflects the current plan and policies applicable to the project now that it has been adopted.</p>

Comment No.	Response
UPC-61	<p>The comment states that the Orcutt Community Plan (OCP) No Build Zone should be identified on Figure 4.7-2 and that the Safety Zone 2 layer on this figure does not look correct.</p> <p>The proposed project includes an annexation of the project site into the City of Santa Maria, by which the County of Santa Barbara OCP would not be applicable to the project site. In addition, the OCP, published in 1997, identified a “No Build Zone” based on the 1993 Santa Barbara County Airport Land Use Plan. The mapped runway alignments and associated safety zones for the Santa Maria Airport identified in the 1993 Santa Barbara County ALUP have since been superseded by the Santa Maria ALUCP, which was adopted in January 2023. Based on the Santa Maria ALUCP, there is no designated “No Build Zone” or similar equivalent designation identified by SBCAG that restricts development in the area identified by the OCP other than the mapped Safety Zones and noise contours, which are described in detail in the EIR. Therefore, the OCP No Build Zone is not applicable to the project and no changes to the EIR are necessary.</p> <p>Safety Zone 2 and the other safety zones identified within Figure 4.7-2 are consistent with the mapped safety zones identified in the adopted Santa Maria ALUCP. Therefore, no changes to the EIR are necessary.</p>
UPC-62	<p>The comment lists a page number and states “should be deleted.” It appears this comment is likely recommending the deletion of the 1993 Santa Barbara County ALUP from the Regulatory Setting section of Section 4.7, Hazards and Hazardous Materials.</p> <p>SBCAG has adopted the Santa Maria ALUCP in January 2023 and the discussion within Section 4.7.2.3 of the EIR has been revised accordingly, as the 2023 Santa Maria ALUCP reflects the most recent up-to-date plan and policies applicable to the project.</p>
UPC-63	<p>The comment lists a page number and states “should be deleted.” It appears this comment is likely recommending the deletion of the 1993 Santa Barbara County ALUP from the Regulatory Setting section of Section 4.7, Hazards and Hazardous Materials.</p> <p>SBCAG has adopted the Santa Maria ALUCP in January 2023 and the discussion within Section 4.7.2.3 of the EIR has been revised accordingly, as the 2023 Santa Maria ALUCP reflects the most recent up-to-date plan and policies applicable to the project.</p>
UPC-64	<p>The comment lists a page number and states “should be deleted.” It appears this comment is likely recommending the deletion of the 1993 Santa Barbara County ALUP from the Regulatory Setting section of Section 4.7, Hazards and Hazardous Materials.</p> <p>SBCAG has adopted the Santa Maria ALUCP in January 2023 and the discussion within Section 4.7.2.3 of the EIR has been revised accordingly, as the 2023 Santa Maria ALUCP reflects the most recent up-to-date plan and policies applicable to the project.</p>
UPC-65	<p>Mitigation Measure HAZ/mm-2.1 states that soil sampling shall be conducted for the presence of hazardous materials, including aerially deposited lead (ADL), shall be required for all areas where excavation is proposed within 30 feet of Union Valley Parkway (UVP). The comment states that because Union Valley Parkway has only been operational for the past 10 years, it would not have the potential to have accumulated potentially harmful levels of ADL along its roadway shoulders.</p> <p>As described in Section 4.7.5 of the EIR, ADL is known to occur in road shoulder areas along highways that have historically experienced heavy vehicle traffic in the project vicinity and elsewhere in the state; however, the highest lead concentrations are usually found within 10 feet of the edge of the pavement and within the top 6 inches of the soil. In some cases, lead is as deep as 2 to 3 feet below the surface and can extend 20 feet or more from the edge of pavement of principal arterial roadways, freeways, highways, and expressways. SR 135 is classified as a freeway south of its intersection with UVP. Potential impacts related to ADL could result from project-related work and infrastructure improvements adjacent to SR 135. Therefore, Mitigation Measure HAZ/mm-2.1 has been corrected to clarify that soil testing shall be required for project-related excavation activities within 30 feet of SR 135, not UVP.</p>
UPC-66	<p>The comment requests Section 4.7.5 be updated to reflect the adopted Santa Maria ALUCP.</p> <p>This section of the EIR has been revised to reflect the recent adoption of the Santa Maria ALUCP, which has superseded the Santa Barbara County ALUP as the applicable airport land use plan for the Santa Maria Airport and its associated AIA.</p>
UPC-67	<p>The comment requests Section 4.7.5 be updated to reflect the adopted Santa Maria ALUCP.</p> <p>This section of the EIR has been revised to reflect the recent adoption of the Santa Maria ALUCP, which has superseded the Santa Barbara County ALUP as the applicable airport land use plan for the Santa Maria Airport and its associated AIA.</p>

Comment No.	Response
UPC-68	<p>The comment indicates that the water demand calculation should also include the recharge to the ground water basin through LCSD recharge and states that a 25% credit is normally allowed in the experience of the commenter. Also, the commenter suggests deleting the last sentence of the paragraph.</p> <p>Golden State Water calculated water demand for the project consistent with their methodology to estimate the supplemental water needed to serve the project (Todd Groundwater 2022). The annual water demand for the project depicted in the conceptual plan is approximately 149.05 acre-feet per year (not including any recharge to the groundwater basin). The final amount of supplemental water to be purchased would be calculated at the time that Planned Development Permits are reviewed and approved by the City. The City has indicated that if the property is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. Supplemental water agreement details would need to be formalized and would occur after annexation. As such, the last sentence is retained.</p>
UPC-69	<p>The comment states that the City of Santa Maria's CPO zoning designation should be included as an additional City zoning designation in the discussion of City zoning designations within the general vicinity of the project site.</p> <p>The City's Land Use Element identifies the Commercial/Professional Office (CPO) land use classification as a preliminary land use classification for the project site. Land use classifications are generally applied to reflect the range of uses that could be developed and identify corresponding zoning districts which guides development an area. According to the City of Santa Maria Land Use Element, the CPO land classification identifies the Commercial Office and Professional Office (CPO) and the Planned Development (PD) overlay as corresponding zoning districts. There is currently no land that is currently designated under the City of Santa Maria CPO zoning district within or near the project site. The CPO land use designation purpose and allowable development types is described under Section 4.9.1.4 of the EIR, Project Site Land Use Designations and Zoning. Therefore, no changes to the EIR are necessary.</p>
UPC-70	<p>The comment states that the EIR has conflicting information in that it identifies the Sphere of Influence zoning for the project site is Commercial but Figure 4.9-2 shows that it is CPO.</p> <p>Section 4.9.1.4 of the EIR describes the current adopted zoning designation of the project site, which is designated by the County of Santa Barbara, Commercial (C-2). Alternatively, Figure 4.9-2 of the EIR identifies the existing City of Santa Maria General Plan designations of the project area, including the preliminary land classifications of land located within the City's Sphere of Influence (SOI). These preliminary land classifications reflect predicted land use designations for areas located within the City's Sphere of Influence if they are annexed into the City in the future. The current Commercial zoning of the site applied by the County does not contradict the preliminary SOI land use classification identified on the site by the City of Santa Maria. Therefore, no changes to the EIR are necessary.</p>
UPC-71	<p>The comment notes that that the SBCAG has adopted the Santa Maria ALUCP in January 2023 and that the discussion within Section 4.9.1.3 should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP.</p>
UPC-72	<p>The comment notes that that the SBCAG has adopted the Santa Maria ALUCP in January 2023 and that the discussion within Section 4.9.1.3 should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP.</p>
UPC-73	<p>The comment points to inconsistencies with the project's identified square footage for commercial uses.</p> <p>The analyses contained in the EIR consider a maximum buildout of 106,800 square feet of commercial uses and a 39,500–square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that did not correctly reference 106,800 square feet of commercial development were typographical errors. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.</p>

Comment No.	Response
UPC-74	<p>The comment notes that SBCAG adopted the Santa Maria ALUCP in January 2023 and that the land use density requirements identified therein should be incorporated into Table 4.9-4 of the EIR. The comment also states that Table 4.9-3 and Table 4.9-4 should be consistent with the tables provided in Section 4.7, Hazards and Hazardous Materials of the EIR.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP. Land Use intensity (i.e., density) requirements associated with the airport safety zones that are applicable to the project site was provided in Table 4.9-3 of the Draft EIR, and this information is provided in Table 4.9-2 of the Final Draft EIR.</p> <p>Table 4.9-4 of the Draft EIR (i.e., Table 4.9-3 of the Final Draft EIR) has been revised to identify land uses that are “conditionally compatible” rather than “potentially compatible” to better reflect the ability of these land uses to be compatible uses within the corresponding airport safety zone if certain conditions are met and to be consistent with the language used in Section 4.7, Hazards and Hazardous Materials of the EIR.</p>
UPC-75	<p>The comment states that the City of Santa Maria General Plan Update is now projected to be reviewed and approved in 2024.</p> <p>The General Plan Update is now projected to be completed and reviewed by decision makers in 2025 rather than the summer of 2023 as previously predicted. Section 4.9.2.3 of the EIR has been updated accordingly.</p>
UPC-76	<p>The comment points to inconsistencies with the project’s identified square footage for commercial uses. This square footage reference, and several others in Section 4.9, Land Use and Planning, have been corrected to reflect a commercial square footage of 106,800 square feet. These corrections do not change any of the significance determinations contained in this chapter.</p>
UPC-77	<p>The comment points to inconsistencies with the project’s identified square footage for commercial uses. This square footage reference, and several others in Section 4.9, Land Use and Planning, have been corrected to reflect a commercial square footage of 106,800 square feet. These corrections do not change any of the significance determinations contained in this chapter.</p>
UPC-78	<p>The comment notes that that the SBCAG adopted the Santa Maria ALUCP in January 2023 and that all policy discussion within Section 4.9 should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP.</p>
UPC-79	<p>The comment notes that the Hummel Drive signal is planned for and has been coordinated with the County of Santa Barbara.</p> <p>This is correct. The Project Description has been revised to reflect that the UVP and Hummel Drive intersection improvements, including signalization, to be constructed in Year 1 of the development, prior to the full buildout of the project (i.e., the 495 units and/or 146,300 square feet of commercial development, including the self-storage (106,800 square feet excluding the self-storage). These additions/clarifications have also been added to the policy consistency evaluation contained in Section 4.9.</p>
UPC-80	<p>The comment notes that Hummel Drive signalization is a regional improvement.</p> <p>Additional text has been added to the policy consistency analysis related to Implementation Program 1. See also response to comment UPC-79.</p>
UPC-81	<p>The comment states that while several policy consistency discussions in Section 4.9.2.4 of the EIR refer to project development being all-electric (no natural gas), the project applicant team wants to include natural gas infrastructure for the proposed commercial buildings on-site.</p> <p>The request to allow natural gas for commercial uses has been considered by the City and the EIR air quality and GHG consultant. It has been determined that equivalent mitigation can be provided that would address and compensate for the potential impact of natural gas use at the commercial sites. Refer to response to comment UPC-41.</p>
UPC-82	<p>The comment notes that that the SBCAG adopted the Santa Maria ALUCP in January 2023 and that the policy consistency discussion in Section 4.9.2.4 of the EIR should be revised accordingly.</p> <p>The language in this section and throughout the EIR has been updated to reflect the recent adoption of the Santa Maria ALUCP.</p>



Comment No.	Response
UPC-83	<p>The comment points to inconsistencies with the project's identified square footage for commercial uses.</p> <p>The analyses contained in the EIR consider a maximum buildout of 106,800 square feet of commercial uses and a 39,500-square foot mini-storage complex on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres. Any erroneous notations of the project's commercial square footage that are not consistent with this have been corrected in the EIR. The several locations of text in the Draft EIR that did not correctly reference 106,800 square feet of commercial development were typographical errors. These corrections do not change any of the significance determinations for the environmental issues areas analyzed throughout Chapter 4 of the EIR.</p>
UPC-84	<p>The comment states that Figure 4.10-3 in the EIR should be updated to only identify the noise contours as shown in the adopted Santa Maria ALUCP.</p> <p>Figure 4.10-3 and Figure 4.10-4 show the Santa Maria Airport noise contours overlaid onto the project site. At the time the Draft EIR was prepared, the most up to date mapped noise contours were used which were based on the 2022 Draft Santa Maria ALUCP. After comparing the noise contours of the adopted 2023 Santa Maria ALUCP and the previous 2022 Draft Santa Maria ALUCP, no difference was found. Therefore, no revisions to the EIR are necessary.</p>
UPC-85	<p>The comment states that the exterior noise for residential units has been changed to 75 dBA in the City of Santa Maria Ordinance.</p> <p>Table 4.10-7 represents the City's noise standards for determination of land use compatibility for new development projects, as identified in the City's currently adopted General Plan, Table N-4 (2009). For residential development, the exterior noise standard of 60 dBA CNEL is consistent with the "normally acceptable" limitation identified in Figure 2 of the State's General Plan Noise Element Guidelines (2017). As noted in the footnote for Table 4.10-7, an exception has been included stating "Outdoor living areas such as patios and balconies may be incorporated into multifamily development projects ("duplex" and "multiple family", and mixed-use projects which incorporate these uses) in areas which experience elevated noise levels. These noise levels may not exceed the "Normally Unacceptable" CNEL (75 dB and above)." This exception is consistent with the City of Santa Maria's Municipal Code, Title 12-Zoning, Section 12-8.15a. This 75 dBA CNEL standard is consistent with the "normally unacceptable" limitation identified in Figure 2 of the State's General Plan Noise Element Guidelines.</p>
UPC-86	<p>The comment states that the wall height in Mitigation Measure NOI/mm-1.2 should acknowledge the change of elevation changes as part of the noise wall between the commercial development and the existing residential lots.</p> <p>In response to this comment, Mitigation Measure NOI/mm-1.2 has been revised to read:</p> <p><i>"The wall shall be constructed to a minimum height of 6 to 8 feet above ground level as determined by a final acoustical assessment"</i></p>
UPC-87	<p>The comment states that the wall height in Mitigation Measure NOI/mm-1.2 should be 6 to 8 feet based on the changes in elevation.</p> <p>Refer to response to comment UPC-86.</p>
UPC-88	<p>The comment notes a typographical error in Mitigation Measure NOI/mm-1.2.</p> <p>This text has been corrected in this Final EIR.</p>
UPC-89	<p>The comment notes that Santa Maria is one of seven cities in Santa Barbara County.</p> <p>Both the comment and the text that was published in the Draft EIR are incorrect. The text of the Draft EIR incorrectly indicated that Santa Maria is one of 14 cities in Santa Barbara County. The incorporated cities in Santa Barbara county are: Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang. The text of the EIR has been updated to correct this error and note that eight incorporated cities are in Santa Barbara County.</p>

Comment No.	Response
UPC-90	<p>The comment notes that the Draft EIR is inconsistent in the numbers used for project-related projected population and employment. Specifically, Table 4.11-6 and elsewhere in the Draft EIR indicated that the project would result in an estimated 1,846 new residents. However, several other sections of the EIR state that the project would result in a new population of 1,346.</p> <p>The projected population and employment numbers contained in the EIR have been revised to be internally consistent. The analysis and projected population contained in the Draft EIR, Section 4.11, Population and housing are correct. Specifically, this section of the Draft EIR correctly used the U.S. Census Bureau's 2020 persons-per-household projection of 3.73, which results in a projected population resulting from the residential units of 1,846 people (<math>3.73 \times 495 = 1,846</math>).</p> <p>In addition to the permanent population introduced by the project, the development would also bring additional employees to the area. Proposed commercial uses include drive-through commercial spaces, a retail center, corner gas station, and mini storage. Potential for job creation would depend on the exact nature and type of commercial uses developed. However, the based on an estimate developed by the Applicant, approximately 485 new jobs are expected to be created.</p> <p>Refinements to the population and employment growth anticipated to result from project development occurred after publication of the Air Quality and GHG Impact Assessment (Appendix E, September 2022). Only minor refinements to the technical analyses included in the EIR were required to accommodate these updated projections. Therefore, the Air Quality and GHG Impact Assessment was not revised/republished. Specifically, revisions to Table 4.2-8 in Section 4.2, Air Quality and Greenhouse Gas, have been made. The calculations in Table 4.2-8, Operational GHG Emissions without Mitigation, and the associated environmental analysis in this section of the EIR have been revised to account for the updated and more accurate population projections.</p>
UPC-91	<p>The comment clarifies that not all the 10,868 service calls made to the Santa Maria Fire Department (SMFD) in 2021, referenced in paragraph 2 of page 4.12-3 of the EIR, are for fires.</p> <p>A revision has been made in the EIR to clarify that not all the service calls are for fires.</p>
UPC-92	<p>The comment indicates that the commenter believes that this service upgrade at the Station 6 in Santa Maria and the new Fire Station 25 in Orcutt should be available by the time the proposed project would be built and that, in the meantime, the mutual aid agreement would come into play with Santa Barbara County Fire Department (SBCFD) responding to calls, but only in times where Orcutt fire trucks are closer.</p> <p>This comment is not in conflict with the information contained in the EIR. At the time the Final EIR was published, there were not further updates to the timing of the SBCFD Fire Station 25.</p>
UPC-93	<p>The comment indicates that the City just entered into agreement for the Blosser Southeast Area 5B Specific Plan 20-acre regional sports complex and that this park facility should be included in Table 4.12-3. The comment also indicates that the Waller park acreage should also be included in this table.</p> <p>Table 4.12-3 only includes City-managed parks that are already constructed and accessible. While the City of Santa Maria may develop a new Sports Complex within the Blosser Southeast Area 5B Specific Plan, this development has not yet occurred. Waller park is appropriately included in Table 4.12-4, which summarizes nearby County-managed parks. Waller park, and other County-managed parks, are described correctly in the text of the EIR as nearby recreational resources that would be available to Richards Ranch residents. Based on this comment and additional research, the acreage of Waller park has been updated in Table 4.12-4.</p>
UPC-94	<p>The comment asks whether the discussion on page 4.12-15 should include the Orcutt Library in Old Town Orcutt and the current effort to build or buy a larger library in the Orcutt area.</p> <p>The text on page 4.12-15 is regarding fire facilities and response time. Existing library facilities are described on page 4.12-7 and the impact analysis for library facilities is on page 4.12-18. The existing conditions text provides the information necessary for assessing library facilities, including reference to the Orcutt Branch, located at 175 South Broadway, approximately 1.5 miles southwest of the project site. In addition, information has been added to reflect the anticipated new Orcutt Branch library, which is not yet constructed but is in Santa Barbara County's Fiscal Year 2023-2028 Capital Improvement Plan.</p>
UPC-95	<p>The comment asks whether the discussion on page 4.12-15 should include information regarding building code requirements for residential uses to be fully sprinklered.</p> <p>The information provided by the commenter is not directly related to the analysis of fire protection services, so it has not been added to the EIR.</p>

Comment No.	Response
UPC-96	<p>The commenter indicates that they believe that the Tax Exchanges Agreement between the County and the City needs to be completed before SBLAFCO will consider annexation of the project. Page 4.12-16 of the EIR has been changed in the Final EIR as follows:</p> <p>Implementation of the project would result in the annexation of the project site into the City of Santa Maria, including changing the service area boundary so that the site would be within the jurisdictional boundary of SMFD rather than SBCFD. As well, as part of the annexation process, the City would need to develop a Resolution of Application to Initiate Annexation, including Adoption of a Plan for Services. The Plan for Services would identify how the City and SMFD would serve the project site using available facilities. <u>Before the executive officer issues a certificate of filing, the involved city, county and affected special districts are required to negotiate the allocation of property tax revenues during a 60-day mandatory negotiation period, unless extended to 90 days.</u> It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined.</p>
UPC-97	<p>The comment indicates that the commenter believes the number of 13,000 students cited in the EIR is wrong because OUSD has 4,133 students and Righetti has 2,467 so there are only 6,600 students in the Orcutt area.</p> <p>As summarized on page 4.12-5 of the EIR:</p> <p>The project site is located within the boundaries of the OUSD (serving grades K–8), and the SMJUHSD (serving grades 9–12). The OUSD consists of 12 schools, including one early learning center, six elementary schools, two junior high schools, two charter schools, and one independent study program. There is an estimated enrollment of 4,133 students within OUSD (Orcutt Union School District 2022a). The SMJUHSD consists of four high schools and the Mark Richardson Career Technical Education Center and Agricultural Farm, with an estimated enrollment of 9,257 students (SMJUHSD 2022a).</p> <p>The summarization of 13,000 students was not intended to only include students in just the Orcutt area but was, instead, meant to summarize the students served by both school districts in total. In 2022, the numbers provided by both school districts indicate they do, in fact, serve more than 13,000 students. A minor edit has been made to the language on page 4.12-17 to avoid confusion of what is meant by the reported student count.</p>
UPC-98	<p>The comment indicates that the commenter believes that the student calculation provided in the EIR is the worst case as the project is 70% 1-, 2-, and 3-bedroom apartments and 30% townhomes and asks that this be noted in the paragraph.</p> <p>This notation is unnecessary; the commenters opinion is speculative. The analysis contained in the EIR is based on information derived from the school districts, population projections made for the proposed project and carried through the analysis. No changes to the EIR have been made.</p>
UPC-99	<p>The comment indicates that the paragraph summarizing school impact fees on page 4.12-18 should include the current school fees for both districts.</p> <p>This information has been added to the EIR.</p>
UPC-100	<p>The comment indicates that the analysis regarding library facilities provided on page 4.12-18 of the EIR should include information on the proposed new library being proposed in Orcutt.</p> <p>This information has been added to the EIR.</p>
UPC-101	<p>The comment indicates that the first paragraph on page 4.12-19 of the EIR should be updated to include the new park the city has agreed to purchase.</p> <p>While the City of Santa Maria may develop a new Sports Complex within the Blosser Southeast Area 5B Specific Plan, this development has not yet occurred.</p>
UPC-102	<p>The comment indicates that the Richards Ranch project would include pocket parks and community center with pool and outdoor recreation to serve the project residents, and that there would not be a dedicated public park with the project.</p> <p>The EIR text referenced by the commenter has been revised in the Final EIR to not reference dedication of the parklands as public facilities.</p>
UPC-103	<p>Regarding Table 4.13-3 and 4.13-4, the comment indicates that the UVP and Bradley Road intersection is signalized and the table indicated that it is unsignalized.</p> <p>This comment is correct; the UVP and Bradley Road intersection is signalized. This typographical error has been corrected in this Final EIR.</p>

Comment No.	Response
UPC-104	<p>The comment suggests that Figure 4.14-1 be amended to include Tanglewood State Water line along Black Road along with the interconnects with the City of Santa Maria and existing Golden State Water wells and storage tanks.</p> <p>This information has not been added to the figure; the intent of the figure is to only show the Golden State Water Orcutt service area boundary.</p>
UPC-105	<p>The comment suggests that Figure 4.14-2 (incorrectly referenced as Figure 4.14-4 by the commenter) be amended to include notes on the Laguna County Sanitation District (LCSD) plant and property owned by the County and the surrounding agricultural operations for discharge for agricultural uses. The comment further suggests that the exhibit needs to show the purple lines that have been installed to provide recycled water to the surrounding area including Waller Park.</p> <p>This information has not been added to the figure; the intent of the figure is to only show the Laguna County Sanitation District service area boundary.</p>
UPC-106	<p>The comment indicates that recycled water is used by the Airport District, Waller Park, and Skyway industrial park. The comment also indicates that recycled water is also provided to Rancho Maria Golf Course.</p> <p>This information has been added to the EIR except for the reference to Skyway industrial park as no additional information was available to confirm the use of recycled water from LCSD. Santa Maria Golf Course was also added to the list of user sites.</p>
UPC-107	<p>The comment indicates that paragraph 5 on page 4.14-9 should include a description of the expansion and upgrade being conducted at LCSD now to meet new state laws for treatment and to serve future development in the area.</p> <p>A reference to the ongoing expansion of the LCSD WWTP from 3.7- to 5-MGD has been added to page 4.14-7.</p>
UPC-108	<p>The comment merely states: "PGE/3CE." It is assumed that the commenter wants additional clarification regarding the delivery of electricity by PG&amp;E but being provided by Central Coast Community Energy. Additional clarifying language has been added in this section of the EIR.</p>
UPC-109	<p>The comment asks why biological resource mitigation measures are listed in the utilities section.</p> <p>As described on page 4.14-20, construction and installation of new and expanded utility infrastructure would have the potential to result in a full range of environmental effects, especially when grading for utilities occurs on the 43.75-acre project site. As required by CEQA, the environmental effects of construction of the project, including the utilities required for the project, must be addressed by the EIR. The mitigation measures listed, including biological resources, have been identified to reduce potential impacts associated with construction of future uses onsite, including construction and installation of new utility infrastructure within the boundaries of the 43.75-acre site.</p>
UPC-110	<p>The comment indicates that water supply would be provided by purchase contract with City of Santa Maria through Golden State Water. In addition, the commenter notes the discrepancy regarding the commercial square footage of the proposed project. Lastly, the comment request that a more explained discussion of Santa Maria water supply occur in the section.</p> <p>The typographical error regarding the commercial square footage has been corrected in the EIR. While it is not clear what is meant by a more explained discussion of Santa Maria water supply, additional information regarding water supply is provided in Master Response 6, Water Supply. The project is subject to the supplemental water requirement pursuant to the Court-adopted Stipulation in <i>Santa Maria Valley Water Conservation District v City of Santa Maria, et al.</i> (and related actions), Lead Case No. CV 770214, Superior Court of the State California, County of Santa Clara, in January 2008, and Commission Decision No. 13-05-011, therefore, a source of supplemental water to offset the increased water demand must be provided. Golden State Water does not currently have any available supplemental water to serve the project. Therefore, the project would be required to identify and secure a source of supplemental water. The City of Santa Maria has supplemental water supplies. Annexation of the site is not a prerequisite to or requirement for allowing for the use of supplemental water supplies to the site. The decision to provide supplemental water is at the discretion of the City of Santa Maria. In the past, the City has elected to not provide supplemental water to proposed commercial development on the Richards Ranch site. The City of Santa Maria reviews and approves requests for the purchase of supplemental water supplies on a case-by-case basis. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water as required by Golden State Water Company. The final Supplemental Water Agreement would be formalized after annexation. Additional information regarding the water supply assessment is also contained in Appendix K of the EIR, which is the Water Supply Assessment prepared by Todd Groundwater.</p>

Comment No.	Response
UPC-111	<p>In reference to Table 4.14.10, the comment notes the project only includes 106,000 (actual, 106,800) square feet of commercial/retail uses.</p> <p>While the commenter is correct that the project includes 106,800 square feet of commercial retail uses, the analysis in Appendix K and Table 4.14.10 are based on land use acreages, not square footage. No revision to the EIR is required to respond to this comment.</p>
UPC-112	<p>The comment requests that bullet 8 on page 5-2 be revised based on the adopted 2023 LUP. It is assumed the commenter means "Airport Land Use Compatibility Plan," rather than LUP. This project objective has been revised throughout the EIR, as follows:</p> <p style="padding-left: 40px;">Create uses that are consistent with the noise, height, and safety guidelines of the Santa Barbara County Association of Governments (SBCAG) adopted Santa Maria Airport Land Use Compatibility Plan (Santa Maria ALUCP).</p>
UPC-113	<p>The comment indicates that the commercial square footage in Table 5-4, which summarizes Alternative 2, is noted as 134,096 which is 28,000 sf more than the Applicant proposes in the project.</p> <p>The commenter is correct in reflecting the commercial square footage of Alternative 2, as summarized in Table 5-4. Revisions have been made throughout this chapter to clarify that the total square footage in the C-2 zone that are assumed in the alternative include square footage for the retail commercial uses as well as the mini-storage. In the case of Alternative 2, 95,096 square feet of retail commercial and 39,000 square feet of mini-storage is assumed.</p>
UPC-114	<p>The comment indicates, in reference to Figure 5-2, that Dancer Avenue would have to be extended as a full access road to provide through circulation to the project which would have an adverse impact on the neighborhoods to the south.</p> <p>Figure 5-2 was not intended to show Dancer Avenue as a through road. Bollards have been added to Figure 5-2 to indicate that Dancer Avenue is not a through road. Like the proposed project, this access would only be for emergency access.</p>
UPC-115	<p>The comment indicates that the transportation analysis for Alternative 2 should discuss the impacts on the Dancer Avenue/Mooncrest neighborhood.</p> <p>As noted above, Figure 5-2 was not intended to show Dancer Avenue as a through road. Bollards have been added to Figure 5-2 to indicate that Dancer Avenue is not a through road. Like the proposed project, this access would only be for emergency use.</p>
UPC-116	<p>The comment indicates that the commenter believes that Alternative 3 is the environmentally superior alternative because Alternative 2 must show that transportation would be increased on Dancer Avenue.</p> <p>This is incorrect. As noted in response to comment UPC-114, Alternative 2 does not have through access on Dancer Avenue.</p>
UPC-117	<p>The comment indicates that the signal at Hummel Drive is a county project that is funded by AB 1600 fees.</p> <p>The project includes frontage improvements along these roadways as well as the installation of a traffic signal at the UVP and Hummel Drive intersection. The County of Santa Barbara also has this improvement noted in their planned infrastructure improvements. The exact funding and timing would need to be finalized at the time that the discretionary permit entitlements for the construction of the project is completed.</p>
UPC-118	<p>The comment indicates that EIR Section 6.1.4 does not seem to address the setting of the site.</p> <p>This section has been revised to provide more detail regarding the land uses surrounding the project site and to more accurately describe the existing setting.</p>
UPC-119	<p>The comment asks for additional information on the class levels of the soils at the project site.</p> <p>It is assumed the commenter is looking for more information regarding the soil texture classes of the soils; the United States Department of Agriculture identifies twelve soil texture classes (e.g., sandy loam, silt loam, clay, silty clay). General information on these classes is included in this section. Additional information from Section 4.6, Geology and Soils, has also been added to this section in response to the comment.</p>
UPC-120	<p>The comment indicates that there are agricultural uses to the northwest on the airport property.</p> <p>The paragraph has been revised in response to this comment; this revision does not change the findings of this section of the EIR.</p>

Comment No.	Response
UPC-121	<p>The comment provides a closing to the letter and indicates that UPC wants to provide updated exhibits for the hearing draft EIR.</p> <p>This comment does not provide any further comments on the EIR. At the time of release of the Final EIR, updated exhibits had not been provided by UPC or the Applicant for the project, so the project description figures in the EIR have not be modified, other than to emphasize the bollards preventing through access on Dancer Avenue. This slight revision was important to depict more clearly that through access on Dancer Avenue is not an element of the proposed project.</p>

*This page intentionally left blank.*

## 1.4 PUBLIC COMMENT LETTERS AND RESPONSES

The following members of the public have submitted comments on the Draft EIR.

**Table 1.4-1. Public Comments**

Respondent	Code	Page
<b>Heather Paige</b> Letter dated: 01/07/2023	HP	1.4-7
<b>Bob Gnibus</b> Letters dated: 01/10/2023, 01/13/2023, and 02/27/2023	BG	1.4-9
<b>Susan Bryant</b> Letters dated: 01/13/2023 and 01/28/2023	SBr	1.4-49
<b>Cynthia Melendez</b> Letter dated: 01/16/2023	CM	1.4-61
<b>Mary Ellen Peters</b> Letter dated: 01/18/2023	MEP	1.4-65
<b>Lynn Alvarez</b> Letter dated: 01/19/2023	LAI	1.4-68
<b>Alyssa Boger</b> Letter dated: 01/19/2023	ABo	1.4-70
<b>Stephanie Burks</b> Letter dated: 01/19/2023	SBu	1.4-72
<b>Jermaine Castillo</b> Letter dated: 01/19/2023	JC	1.4-74
<b>Ismael and Linda Castillo</b> Letter dated: 01/19/2023	ILC	1.4-76
<b>Debra Coker</b> Letter dated: 01/19/2023	DC	1.4-78
<b>Leslie Griego</b> Letter dated: 01/19/2023	LG	1.4-80
<b>Jillian Hankins</b> Letter dated: 01/19/2023	JH	1.4-82
<b>Tiffany Hopkins</b> Letter dated: 01/19/2023	TH	1.4-84
<b>Mary Housel</b> Letter dated: 01/19/2023	MHo	1.4-86
<b>Edward and Catriena Lyons</b> Letters dated: 01/19/2023 and 01/25/2023	ECL	1.4-88
<b>Anastacia Malm</b> Letter dated: 01/10/2023	AM	1.4-91
<b>Carolyn and Robert McBurney</b> Letter dated: 01/19/2023	CRM	1.4-94
<b>Kara Miller</b> Letter dated: 01/19/2023	KMi	1.4-96



Respondent	Code	Page
<b>Maria Perez</b> Letter dated: 01/19/2023	MP	1.4-98
<b>Jesse Skoda</b> Letter dated: 01/19/2023	JS	1.4-100
<b>Marisol Vazquez De Duyck</b> Letter dated: 01/19/2023	MVD	1.4-102
<b>Charlee Zleisy-Wilson</b> Letter dated: 01/19/2023	CZW	1.4-104
<b>Linda Adams</b> Letter dated: 01/19/2023	LAd	1.4-106
<b>Dan Applebay</b> Letter dated: 01/20/2023	DA	1.4-108
<b>Jennifer Arkinson</b> Letter dated: 01/20/2023	JA	1.4-110
<b>Natalie Bakke and Family</b> Letter dated: 01/20/2023	NBF	1.4-112
<b>Steven Beebe</b> Letters dated: 01/20/2023 and 02/03/2023	SBe	1.4-114
<b>Anna Blundell</b> Letter dated: 01/20/2023	AJB	1.4-117
<b>Lynn Burchard</b> Letter dated: 01/20/2023	LB	1.4-119
<b>Cortez Family</b> Letter dated: 01/20/2023	CF	1.4-121
<b>Stephanie Cortner</b> Letter dated: 01/20/2023	SC	1.4-123
<b>Cherie and Eldon Cribbs</b> Letter dated: 01/20/2023	CEC	1.4-125
<b>Haylie Cribbs</b> Letter dated: 01/20/2023	HC	1.4-127
<b>Chyanne Gaona</b> Letter dated: 01/20/2023	CG	1.4-130
<b>Teresa Gardner</b> Letter dated: 01/20/2023	TG	1.4-132
<b>Deborah Guerero</b> Letter dated: 01/20/2023	DG	1.4-134
<b>Vivian R. Hernandez</b> Letter dated: 01/20/2023	VRH	1.4-136
<b>Jazmín</b> Letter dated: 01/20/2023	JJ	1.4-139
<b>Kristina Johnson</b> Letter dated: 01/20/2023	KJ	1.4-141
<b>Renee Kolding</b> Letter dated: 01/20/2023	RK	1.4-143

Respondent	Code	Page
<b>Duft Family</b> Letter dated: 01/20/2023	DF	1.4-145
<b>Eric and Natalie Mahoney</b> Letter dated: 01/20/2023	ENM	1.4-148
<b>Kayla Moore</b> Letter dated: 01/20/2023	KMo	1.4-150
<b>Amber Nelson</b> Letter dated: 01/20/2023	ANe	1.4-152
<b>Armando Nol</b> Letter dated: 01/20/2023	ANo	1.4-154
<b>Jazmin Nol</b> Letter dated: 01/20/2023	JN	1.4-156
<b>Sandra A. Peterson</b> Letter dated: 01/20/2023	SAP	1.4-158
<b>Peggy Rokos</b> Letter dated: 01/20/2023	PR	1.4-160
<b>Martha Silva</b> Letter dated: 01/20/2023	MSi	1.4-162
<b>Patricia S. Sly (Feighner)</b> Letter dated: 01/20/2023	PSF	1.4-164
<b>Katie Sly</b> Letter dated: 01/20/2023	KS	1.4-166
<b>Dr. Jacob and Melinda Studer</b> Letter dated: 01/20/2023	JMS	1.4-168
<b>Carol Toney</b> Letter dated: 01/20/2023	CTo	1.4-170
<b>Karli Tripp</b> Letter dated: 01/20/2023	KT	1.4-172
<b>James D Valente</b> Letter dated: 01/20/2023	JDV	1.4-174
<b>Noemi Vargas</b> Letter dated: 01/20/2023	NV	1.4-176
<b>Curtis Warner</b> Letter dated: 01/20/2023	CW	1.4-178
<b>Lois Weddle</b> Letter dated: 01/20/2023	LW	1.4-183
<b>Nancy Jensen</b> Letter dated: 01/21/2023	NJ	1.4-185
<b>Steigler</b> Letter dated: 01/21/2023	Ste	1.4-187
<b>Francine Hutchinson</b> Letter dated: 01/22/2023	FH	1.4-189
<b>Salvador Morales</b> Letter dated: 01/22/2023	SM	1.4-191

Respondent	Code	Page
<b>Ardis Neilsen</b> Letter dated: 01/22/2023	ArN	1.4-193
<b>Mary Jo Silbernagle</b> Letter dated: 01/22/2023	MJS	1.4-195
<b>Candace Thompson</b> Letter dated: 01/23/2023	CTh	1.4-197
<b>Lynnetta Zuzow</b> Letter dated: 01/23/2023	LZ	1.4-199
<b>Michelle Betty</b> Letter dated: 01/24/2023	MB	1.4-201
<b>Elizabeth Lopez-Doll</b> Letter dated: 01/25/2023	ELD	1.4-203
<b>Alan and Barbara Walker</b> Letter dated: 01/25/2023	ABW	1.4-205
<b>Ken Hough</b> Letter dated: 01/28/2023	KH	1.4-207
<b>Robert Whittier</b> Letter dated: 01/28/2023	RW	1.4-209
<b>Sofy</b> Letter dated: 01/29/2023	So	1.4-211
<b>Pam Mathews</b> Letter dated: 01/30/2023	PM	1.4-213
<b>Charlotte Pettit</b> Letter dated: 01/30/2023	CP	1.4-215
<b>Donna Pulling</b> Letters dated: 01/30/2023 and 02/27/2023	DP	1.4-217
<b>Chris Seymour</b> Letter dated: 01/30/2023	CSe	1.4-220
<b>Nancy Snyder</b> Letter dated: 01/30/2023	NS	1.4-222
<b>Concerned Citizen</b> Letter dated: 02/01/2023	CC	1.4-224
<b>Tim Rogers</b> Letters dated: 02/03/2023 and 03/06/2023	TR	1.4-226
<b>Heather Reese</b> Letter dated: 02/04/2023	HR	1.4-238
<b>Myrna Heldfond</b> Letter dated: 02/08/2023	MHe	1.4-240
<b>Stephen Teague</b> Letter dated: 02/12/2023	SDT	1.4-242
<b>Cliff Solomon</b> Letter dated: 02/24/2023	CSo	1.4-244
<b>Laurie Haro</b> Letter dated: 02/25/2023	LH	1.4-246

Respondent	Code	Page
<b>Kenneth McCalip</b> Letter dated: 02/25/2023	KMC	1.4-248
<b>Michael Edberg</b> Letter dated: 02/26/2023	MEd	1.4-250
<b>Susan Ferrant</b> Letter dated: 02/27/2023	SF	1.4-252
<b>Kathryn Jacobson and Paul Cooke</b> Letter dated: 02/27/2023	KJPC	1.4-254
<b>TJ</b> Letter dated: 02/27/2023	TJ	1.4-256
<b>Mary and Robert Perry</b> Letter dated: 02/28/2023	MRP	1.4-258
<b>Shirley Randall</b> Letter dated: 02/28/2023	SMR	1.4-260
<b>Courtnie Hayson</b> Letter dated: 03/01/2023	CH	1.4-262
<b>Bert Johnson</b> Letter dated: 03/01/2023	BJ	1.4-264
<b>Chris Straub</b> Letter dated: 03/01/2023	CSt	1.4-268
<b>Douglas Brown</b> Letter dated: 03/03/2023	DB	1.4-270
<b>Josh Islas</b> Letter dated: 03/03/2023	JI	1.4-272
<b>Maureen Soderberg</b> Letter dated: 03/03/2023	MSo	1.4-274
<b>Steve Strachan</b> Letter dated: 03/03/2023	SS	1.4-276
<b>Carolyn Christiansen</b> Letter dated: 03/05/2023	CCh	1.4-278
<b>Steve LeBard</b> Letter dated: 03/06/2023	SLB	1.4-280
<b>Salvador Melendez II</b> Letter dated: 03/05/2023	SMII	1.4-285
<b>Adolph Sherer</b> Letter dated: 03/06/2023	AS	1.4-288
<b>Susan Wilson</b> Letter dated: 03/06/2023	SW	1.4-292
<b>Carla and Ken Canby</b> Letter dated: 03/07/2023	CKC	1.4-295
<b>Scott and Cathy Wells</b> Letter dated: 03/07/2023	SCW	1.4-297
<b>Felix Diaz</b> Letter dated: 03/07/2023	FD	1.4-299

Respondent	Code	Page
<b>Tara Diaz</b> Letter dated: 03/07/2023	TD	1.4-301
<b>Pam Gates</b> Letter dated: 03/07/2023	PG	1.4-304
<b>Alicia King</b> Letter dated: 03/07/2023	AK	1.4-311
<b>Constance King</b> Letter dated: 03/07/2023	CK	1.4-320
<b>Vance and Jerrilyn Matzke</b> Letter dated: 03/07/2023	VJM	1.4-323
<b>Andrew Oman</b> Letter dated: 03/07/2023	AO	1.4-325
<b>Katy Rogers</b> Letter dated: 03/07/2023	KR	1.4-327
<b>Eric Wilson</b> Letter dated: 03/07/2023	EW	1.4-331

## 1.4.1 Heather Paige

**From:** Heather Paige <hapaige2@gmail.com>  
**Sent:** Saturday, January 7, 2023 6:05 PM  
**To:** Dana Eady <deady@cityofsantamaria.org>  
**Subject:** Annex key site 26

Hi Dana,

I'm writing to state my concerns with Santa Maria annexing land that is currently part of Orcutt. I highly recommend this land remain a part of Orcutt. I know many people will complain about the impact of housing and the increased traffic on UVP. I do not see this as the biggest problem. In fact I expect that lane will at some point become developed.

I however am extremely concerned about this land becoming a part of the city. Santa Maria is currently struggling to provide police and fire response services to their residents. This land is far away from any police or fire station that is owned by the city. This land however is extremely close to both SBCO sheriffs and the soon to be built SBCO fire station. These emergency services would be best suited to respond to anything built on this land and these emergency services deserve to receive the sales tax and home owner taxes that would be generated from this land.

Secondly if this land becomes a part of the city these families would become a part of SMBSD school district. That means these families would need to figure out how to get their children to the closest Santa Maria elementary and Jr High. The closet elementary school is Jimenez Elementary at 3.7 miles away and the closest Jr. high is Arellanes at 6.0 miles away. If this land were to be developed as a part of Orcutt elementary students would be in walking distance at 1.2 miles away from Patterson and 1.3 miles away from Joe Nightingale as well as .7 of a mile away from Lakeview Jr High.

The slow response times of emergency services and the long distance young children would have to walk to school is a safety hazard. Developing this land as part of Santa Maria is reckless and greatly endangers the safety of anyone who lives in these developments.

Thank you for your time and consideration.

Sincerely;  
Heather Paige

HP-1

HP-2

### 1.4.1.1 Response to Letter from Heather Paige

Comment No.	Response
HP-1	The comment raises concern related to the provision of police and fire protection services. Refer to MR-1, which responds to comments related to emergency services.
HP-2	<p>The comment raises concern related to the safety of school-aged children traveling to the designated school sites.</p> <p>The distance children need to travel to attend school is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p> <p>See also MR-2, which responds to comments related to public school services.</p>

## 1.4.2 Bob Gnibus

Richards Ranch Annexation Project

Dana Eady, Planning Division Manager, City of Santa Maria California

[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

As noted in the Draft EIR (SCH # 2022020194)

Hummel Drive will remain in Santa Barbara County and will not be annexed to the City as part of this Project. It is listed in Table 2 as LOS D for both AM and PM Peak Hours and going East UVP (Union Valley Parkway) will not be extended to 4-lanes past Hummel Drive.

The extension of Dancer Ave into the Project should be a locked gate for emergency access only. Residents from the 95 Townhomes (and 400 apartment residents?) will take Dancer Ave to Mooncrest Lane to Hummel Drive when going East on UVP instead of going to Orcutt Road on the New Street in the Project (this route is noted as secondary access in the EIR). This will impact current residents at the Hummel Drive intersection at UVP and increase traffic in the Suncrest Gardens HOA development, especially at Kenai Court with the parked vehicles along Mooncrest Lane at the State of California approved 425 Mooncrest Juvenile Facility.

If residents of the Project decide to take Dancer Ave to Mooncrest Lane to Hummel Drive to UVP and try to turn left or go straight, then the current Hummel Drive and UVP intersection will be a nightmare for current residents.

A traffic signal at Hummel Drive must be included as part of this Project, not at some time in the distant future. As noted in Table 20, this intersection will operate at LOS F until the improvements are made and is listed as Not Consistent in Table 8 & 9.

UVP needs to be improved to 4-lanes past Hummel Drive to the East as part of this Project, not at some time in the distant future.

I did not see a Traffic and Circulation Study for the Dancer Ave extension to the Mooncrest Lane intersection in the EIR. What additional traffic is expected on Mooncrest Lane due to this Project? As noted above, the extension of Dancer Ave into the Project should be a locked gate for emergency access only.

I cannot believe that the City of Santa Maria and the County of Santa Barbara would permit Three Story Apartments and Two Story Townhomes so close to the approach to the Santa Maria Airport, especially with the recent military aircraft operations that fly very low directly over my house on Kenai Court and directly over the proposed Project to the Santa Maria Airport. This seems like a risk that needs to be considered for the Richards Ranch Annexation Project due to current and future military activities at the Santa Maria Airport.

(see below screen shots)

BG 1-1

BG 1-2

↓BG 1-3



Hummel Drive, located east of the Project site, is a two-lane north-south collector road that extends north from the UVP to Foster Road where it becomes Dartmouth Street; and south from the UVP to its terminus at Patterson Road. Within the Project study-area, no bike lanes are provided on Hummel Drive. It is noted that Hummel Drive is located in Santa Barbara County and would not be annexed to the City as part of the Project.

#### Existing Pedestrian Facilities

Within the Project study area, sidewalks are currently provided on the south side of the UVP and the east side of Orcutt Road. On the north side of the UVP, sidewalks are provided from the Orcutt Expressway to Orcutt Road; and no sidewalks are provided on the west side of Orcutt Road. ADA accessible crosswalks with pedestrian signals heads are provided on all four legs of the UVP/Orcutt Road intersection and three of the four legs of the UVP/Orcutt Expressway intersection. At the UVP/Hummel Drive intersection, a “continental” style crosswalk with flashing beacons is provided on the east leg of the intersection (across the UVP) and standard crosswalks are provided on the north and south legs. Figure 4b shows the pedestrian improvements proposed in the Project study-area in the City’s Pedestrian Master Plan.

BG 1-3  
(cont’d)

Table 2  
Existing Levels of Service

Intersection	Jurisdiction	Control	AM Peak Hour		PM Peak Hour	
			ICU or Delay	LOS	ICU or Delay	LOS
Orcutt Expressway/Lakeview Rd	Caltrans	Signal	0.61	LOS B	0.66	LOS B
Orcutt Expressway /Foster Rd	Caltrans	Signal	0.71	LOS C	0.64	LOS B
UVP/Foxenwood Ln(a)	City	STOP-Sign	14.3 sec.	LOS B	9.9 sec.	LOS A
UVP/ Orcutt Expressway	Caltrans	Signal	0.62	LOS B	0.63	LOS B
UVP/Orcutt Road	County	Signal	0.46	LOS A	0.47	LOS A
<b>UVP/Hummel Drive(a)</b>	County	STOP-Sign	<b>34.7 sec.</b>	<b>LOS D</b>	<b>34.3 sec.</b>	<b>LOS D</b>
UVP/Bradley Road(a)	County	Signal	0.39	LOS A	0.51	LOS A
UVP/US 101 SB Ramps(a)	Caltrans	STOP-Sign	12.4 sec.	LOS B	15.0 sec.	LOS B
UVP/US 101 NB Ramps(a)	Caltrans	STOP-Sign	9.3 sec.	LOS A	9.4 sec.	LOS A

**Bolded Values exceed City/County LOS policy standards.**

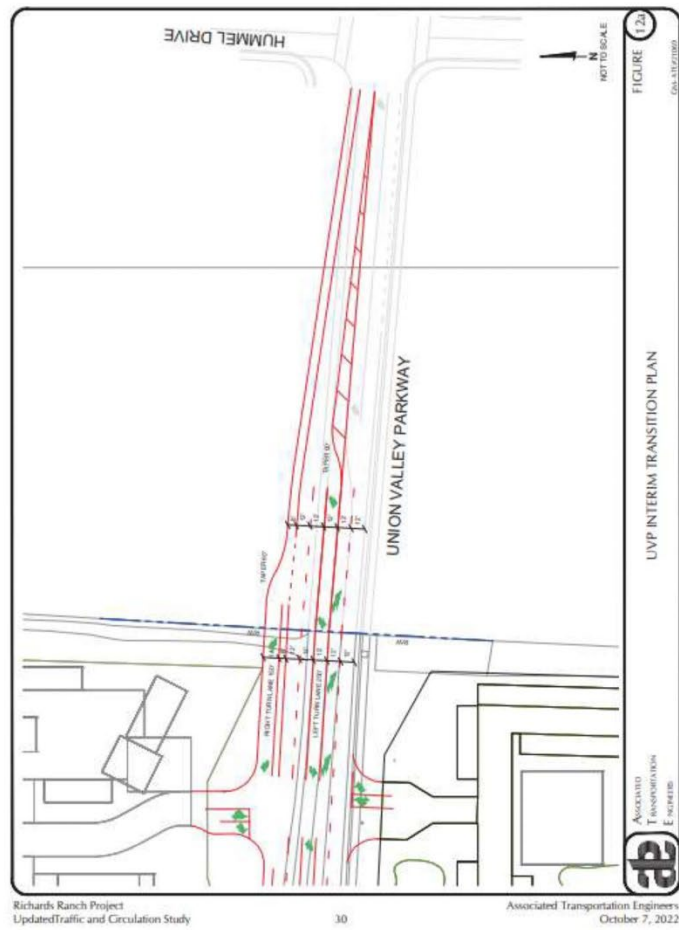
(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

The data presented in Table 2 show that the UVP/Hummel Drive intersection currently operates in the LOS D range during the AM and PM peak hours, which exceeds the County's LOS C standard in this area. The remaining study-area intersections currently operate in the LOS A-C range during the AM and PM peak hours, which meet the City's LOS D operating standard and the County's LOS C - D operating standard.

#### TRAFFIC POLICY STANDARDS

As noted in Table 2, several of the study-area intersections are located in the City of Santa Maria and several of the intersections are located in the County of Santa Barbara. Both the City and County traffic consistency standards were therefore utilized to assess the Project's traffic additions. There are additional intersections that are under Caltrans' jurisdiction. The current Caltrans Transportation Impact Study Guide is based on VMT and not LOS, thus the VMT section of this report addresses the Caltrans requirements.

<sup>3</sup> Highway Capacity Manual, Transportation Research Board, 6<sup>th</sup> Edition, 2016.



BG 1-3  
(cont'd)

#### UVP/Hummel Drive Intersection

County staff have indicated that the ultimate plan for the UVP adjacent to the Hummel Drive intersection is to widen UVP from two lanes to four lanes with left-turn channelization. This widening will occur west of Hummel Drive to match the four lanes in front of the Project site. In addition, County staff indicated that traffic signals may be installed at the UVP/Hummel Drive intersection in the future. Figure 18 provides a schematic illustration of the future intersection design with the widening. Table 20 presents the Existing + Project and Cumulative + Project levels of service forecasts for the intersection assuming implementation of the improvements.

**Table 20**  
**Intersection Levels of Service With Improvements**

Intersection	Existing + Project		Cumulative + Project	
	Existing Geometry	With Improvements	Existing Geometry	With Improvements
UVP/Hummel Drive AM(a)	> 50.0 sec. / LOS F	0.47 / LOS A	> 50.0 sec / LOS F	0.49 / LOS A
UVP/Hummel Drive PM(a)	> 50.0 sec. / LOS F	0.49 / LOS A	> 50.0 sec / LOS F	0.52 / LOS A

(a) Assumes UVP widening and traffic signal installation.

The data presented in Table 20 show that with the planned improvements, the UVP/Hummel Drive intersection will operate in the LOS A range.

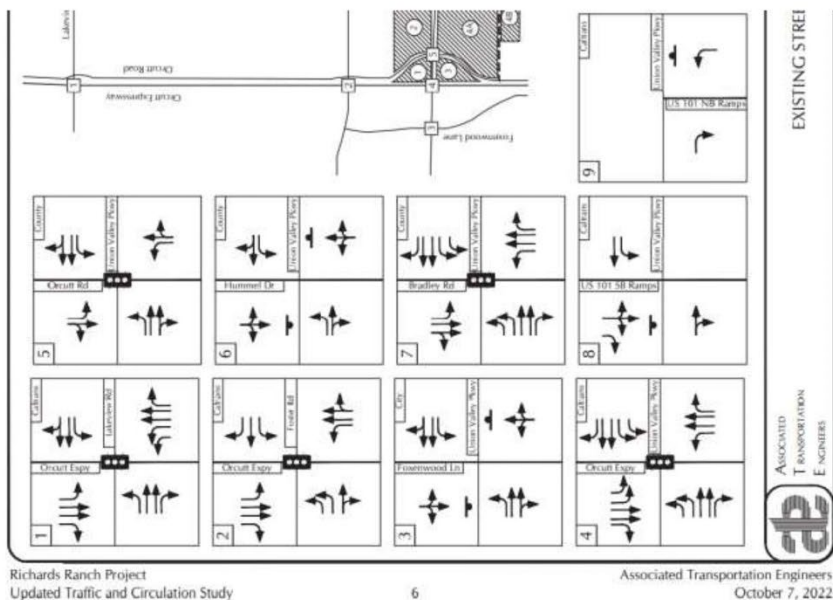
BG 1-3  
(cont'd)

Table 20  
Intersection Levels of Service With Improvements

Intersection	Existing + Project		Cumulative + Project	
	Existing Geometry	With Improvements	Existing Geometry	With Improvements
UVP/Hummel Drive AM(a)	> 50.0 sec. / LOS F	0.47 / LOS A	> 50.0 sec. / LOS F	0.49 / LOS A
UVP/Hummel Drive PM(a)	> 50.0 sec. / LOS F	0.49 / LOS A	> 50.0 sec. / LOS F	0.52 / LOS A

(a) Assumes UVP widening and traffic signal installation.

The data presented in Table 20 show that with the planned improvements, the UVP/Hummel Drive intersection will operate in the LOS A range.



BG 1-3  
(cont'd)

### Parcel 4B Access and Circulation

This parcel is located south of Parcel 4A and east of the Gloria Dei Lutheran Church on Orcutt Road. Parcel 4B would contain 95 townhome units. As shown on residential site plan (see Figure 2b) access to the site is proposed via a new east-west access road that would extend easterly from Orcutt Road between Parcels 4A and 4B. **Secondary access would be provided through the internal road system in the adjacent Parcel 4A which provides access to the UVP.** Figure 14 shows the access improvements that should be considered for Parcel 4B, which are reviewed below.

1. Orcutt Road should be widened north and south of the driveway to provide a southbound left-turn lane at the new roadway connection.
2. The new roadway approach should be controlled by stop signs.
3. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed apartment buildings.

Richards Ranch Project  
Updated Traffic and Circulation Study

- 33 -

Associated Transportation Engineers  
October 7, 2022

BG 1-3  
(cont'd)

Associated Transportation Engineers Trip Generation Worksheet																
RICHARDS RANCH - SANTA MARIA (#2108) - WITH NO INTERNAL TRIP FACTOR																
Use	Size	Internal Factor	ADT		AM PEAK HOUR					PM PEAK HOUR						
			Rate	Trips	Rate	Trips	In %	Trips	Out %	Trips	Rate	Trips	In %	Trips	Out %	Trips
<b>COMMERCIAL</b>																
High Turnover Sit Down Restaurant (a)	5,000 SF	1.00	107.20	536	0.57	48	55%	26	45%	22	0.05	45	61%	27	38%	18
2 Restaurants without Drive Thru (b)	5,000 SF	1.00	97.14	583	1.63	9	50%	5	50%	4	12.56	75	55%	41	45%	34
6 Drive Thru Restaurants (c)	16,750 SF	1.00	407.48	8,795	44.61	836	51%	426	49%	410	33.03	619	52%	322	48%	267
Shopping Center (d)	55,000 SF	1.00	94.49	5,197	3.53	194	62%	120	38%	74	0.84	541	48%	260	52%	281
Gas Station with Mart (e)	10 Fueling Positions	1.00	200.80	2,098	16.06	161	50%	81	50%	80	18.42	164	50%	92	50%	92
Car Wash-Automated (f)	1 Turnbay	1.00	240.00	240	8.50	9	50%	5	50%	4	23.70	24	50%	12	50%	12
Lube Station (g)	3 Bays	1.00	40.00	120	3.00	9	67%	6	33%	3	4.85	15	56%	8	44%	7
Mini Storage (h)	39,600 SF	1.00	1.42	57	0.09	4	59%	2	41%	2	0.15	6	47%	3	53%	3
Subtotals:	124,250 SF			17,515		1,278	671		599		1,509	765		744		
<b>RESIDENTIAL</b>																
Three Story Apartments (i)	400 DU	1.00	6.60	2,639	0.37	147	24%	35	76%	112	0.48	193	62%	122	37%	71
Two Story Townhomes (j)	95 DU	1.00	6.60	627	0.37	35	24%	8	76%	27	0.48	46	63%	29	37%	17
Subtotals:	495 DU			3,266		182	43		139		239	191		88		
Totals:				20,781		1,462	714		738		1,748	916		832		

(a) Trip generation based on ITE values for High-Turnover (Sit-Down) Restaurant (ITE #602) Average Rate.  
 (b) Trip generation based on ITE values for Fast Casual Restaurant (ITE #603) Average Rate.  
 (c) Trip generation based on ITE values for Fast-Food Restaurant with Drive-Through Window (ITE #604) Average Rate.  
 (d) Trip generation based on ITE values for Shopping Plaza (ITE #621) Average Rate for ADT and AM Peak Hour. Pooled Curve Equation for PM Peak Hour.  
 (e) Trip generation based on ITE values for Convenience Store/Gas Station (ITE #640) Pooled Curve Equation for ADT. Average Rate for AM/PM Peak Hours.  
 (f) Trip generation for Car Wash-Automated derived from local studies.  
 (g) Trip generation based on ITE values for Quick Lubrication Vehicle Shop (ITE #641) Average Rate.  
 (h) Trip generation based on ITE values for Mini-Warehouse (ITE #101).  
 (i) Trip generation based on ITE values for Multifamily Housing (Low-Rise) (ITE #620) Pooled Curve Equation.

TRIP TYPE	ADT	AM PEAK	PM PEAK
Internal (30% ADT, 13% AM, 45% PM) (45% for Car Wash)	6,272	192	787
External (70% ADT, 87% AM, 55% PM) (45% for Car Wash)	14,509	1,260	951

### Existing + Project Intersection Operations

Levels of service were calculated for the study-area intersections assuming the Existing + Project traffic volumes shown on Figure 7. Tables 8 and 9 compare the Existing and Existing + Project level of service forecasts and identify the Project's consistency with the City's LOS D standard and the County's LOS C – D standard.

**Table 8**  
**Existing + Project Levels of Service – AM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.61	LOS B	0.63	LOS B	Yes
Orcutt Expressway /Foster Rd	0.71	LOS C	0.74	LOS C	Yes
UVP/Foxenwood Ln (a)	14.3 sec.	LOS B	15.8 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.62	LOS B	0.67	LOS B	Yes
UVP/Orcutt Road	0.46	LOS A	0.73	LOS C	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.7 sec.</b>	<b>LOS D</b>	<b>&gt;50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.39	LOS A	0.42	LOS A	Yes
UVP/US 101 SB Ramps (a)	12.4 sec.	LOS B	13.2 sec.	LOS B	Yes
UVP/US 101 NB Ramps(a)	9.3 sec.	LOS A	9.4 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection, LOS based on average weighted control delay per vehicle in seconds.

**Table 9**  
**Existing + Project Levels of Service – PM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.66	LOS B	0.69	LOS B	Yes
Orcutt Expressway /Foster Rd	0.64	LOS B	0.66	LOS B	Yes
UVP/Foxenwood Ln (a)	9.9 sec.	LOS A	10.2 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.63	LOS B	0.70	LOS B	Yes
UVP/Orcutt Road	0.47	LOS A	0.64	LOS B	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.3 sec.</b>	<b>LOS D</b>	<b>&gt;50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.51	LOS A	0.54	LOS A	Yes
UVP/US 101 SB Ramps (a)	15.0 sec.	LOS B	16.6 sec.	LOS C	Yes
UVP/US 101 NB Ramps(a)	9.4 sec.	LOS A	9.5 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection, LOS based on average weighted control delay per vehicle in seconds.

BG 1-3  
(cont'd)

Richards Ranch Annexation Project (*updated 13Jan2023 Bold & Italic*)

Dana Eady, Planning Division Manager, City of Santa Maria California

[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

As noted in the Draft EIR (SCH # 2022020194)

Hummel Drive will remain in Santa Barbara County and will not be annexed to the City as part of this Project. It is listed in Table 2 as LOS D for both AM and PM Peak Hours (*see below screen shot from p# 12 in the EIR Appendix*) and going East UVP (Union Valley Parkway) will not be extended to 4-lanes past Hummel Drive (*see below screen shot from p# 46*).

The extension of Dancer Ave into the Project should be a locked gate for emergency access only. Residents from the 95 Townhomes (*and residents from the 400 apartments?*) will take Dancer Ave to Mooncrest Lane (*Speed Limit 25 MPH*) to Hummel Drive (*Speed Limit 35 MPH*) when going East on UVP (*this route is noted as secondary access in the EIR Appendix from p# 33*) instead of going to Orcutt Road on the New Street in the Project (*this route is noted as secondary access in the EIR*). This will impact current residents at the Hummel Drive intersection at UVP and increase traffic in the Suncrest Gardens HOA development, especially at Kenai Court with the parked vehicles along Mooncrest Lane at the State of California approved 425 Mooncrest Juvenile Facility.

If residents of the Project decide to take Dancer Ave to Mooncrest Lane to Hummel Drive to UVP and try to turn left or go straight, then the current Hummel Drive and UVP intersection will be a nightmare for current residents.

A traffic signal at Hummel Drive must be included as part of this Project, not at some time in the distant future. As noted in Table 20 (*see below screen shot from p# 46 in the EIR Appendix*), this intersection will operate at LOS F until the improvements are made and is listed as Not Consistent in Table 8 & 9 (*see below screen shot from p# 19*).

UVP needs to be improved to 4-lanes past Hummel Drive to the East as part of this Project, not at some time in the distant future (*see below screen shot of Figure 18 in the EIR Appendix*).

I did not see a Traffic and Circulation Study for the Dancer Ave extension to the Mooncrest Lane intersection in the EIR. What additional traffic is expected on Mooncrest Lane (*Speed Limit 25 MPH*) due to this Project? As noted above, the extension of Dancer Ave into the Project should be a locked gate for emergency access only.

I cannot believe that the City of Santa Maria and the County of Santa Barbara would permit Three Story Apartments and Two Story Townhomes so close to the approach to the Santa Maria Airport, especially with the recent military aircraft operations that fly very low directly over my house on Kenai Court and directly over the proposed Project to the Santa Maria Airport. This seems like a risk that needs to be considered for the Richards Ranch Annexation Project due to current and future military activities at the Santa Maria Airport (*see below screen shot Figure 4.7-1 from p# 4.7-5, "1993 ALUP Safety Area 2 for the Santa Maria Public Airport*).

(see below screen shots *from EIR VOLUME 2: APPENDIX, unless noted otherwise*)

BG 2-1

BG 2-2

BG 2-3



City Government • Departments • Community Development • Planning Division • Planning Policies and Regulations

## DOCUMENTS OUT FOR PUBLIC REVIEW

Font Size: [A](#) [A](#) [A](#) [Share & Bookmarks](#) [Print](#)

### Environmental Review And Documents

The City considers the potential effects of all discretionary projects based on the California Environmental Quality Act (CEQA). Based on CEQA, many small projects are exempt from environmental review. This webpage provides environmental documents for projects that are not exempt, and required an Environmental Impact Report (EIR), Mitigated Negative Declaration (MND) or Negative Declaration (ND) in recent years. Environmental documents from earlier years are available in the Planning Division of the Community Development Department.

Below is a brief description of the types of documents listed on this webpage.

A **Negative Declaration (ND)** is a document prepared when an initial study of the project finds that there would be no significant impacts from the project.

A **Mitigated Negative Declaration (MND)** is a document prepared when an initial study of the project identifies potential impacts, but the project applicant revises the project or includes mitigation measures that reduces these impacts to less than significant levels.

An **Environmental Impact Report (EIR)** is a detailed document, normally prepared when an initial study of the project identifies significant impacts that cannot be clearly mitigated. The EIR describes and analyzes the impacts of a project and discusses ways to reduce or avoid the impacts. In some cases, the impacts may be unavoidable and a Statement of Overriding Considerations is necessary.

### Draft Documents Available for Public Review and Comment

Project Title:	Documents:	Location	Public Comment Period:	Contact:
Richards Ranch Annexation (AN2021-0001)	<a href="#">Richards Ranch Annexation Draft EIR</a> <a href="#">EIR Appendix for Richards Ranch Annexation</a> <a href="#">Notice of Availability for Richards Ranch Annexation</a>	Northeast and Southeast of the intersection of State Route 135 and Union Valley Parkway	December 22, 2022 to February 6, 2023	<a href="#">Dana Eady</a>

BG 2-3  
(cont'd)

3-separate documents

Richards Ranch Annexation Draft EIR

EIR Appendix for Richards Ranch Annexation

Notice of Availability for Richards Ranch Annexation

Hummel Drive, located east of the Project site, is a two-lane north-south collector road that extends north from the UVP to Foster Road where it becomes Dartmouth Street; and south from the UVP to its terminus at Patterson Road. Within the Project study-area, no bike lanes are provided on Hummel Drive. It is noted that Hummel Drive is located in Santa Barbara County and would not be annexed to the City as part of the Project.

#### Existing Pedestrian Facilities

Within the Project study area, sidewalks are currently provided on the south side of the UVP and the east side of Orcutt Road. On the north side of the UVP, sidewalks are provided from the Orcutt Expressway to Orcutt Road; and no sidewalks are provided on the west side of Orcutt Road. ADA accessible crosswalks with pedestrian signals heads are provided on all four legs of the UVP/Orcutt Road intersection and three of the four legs of the UVP/Orcutt Expressway intersection. At the UVP/Hummel Drive intersection, a "continental" style crosswalk with flashing beacons is provided on the east leg of the intersection (across the UVP) and standard crosswalks are provided on the north and south legs. Figure 4b shows the pedestrian improvements proposed in the Project study-area in the City's Pedestrian Master Plan.

BG 2-3  
(cont'd)

Table 2  
Existing Levels of Service

Intersection	Jurisdiction	Control	AM Peak Hour		PM Peak Hour	
			ICU or Delay	LOS	ICU or Delay	LOS
Orcutt Expressway/Lakeview Rd	Caltrans	Signal	0.61	LOS B	0.66	LOS B
Orcutt Expressway /Foster Rd	Caltrans	Signal	0.71	LOS C	0.64	LOS B
UVP/Foxenwood Ln(a)	City	STOP-Sign	14.3 sec.	LOS B	9.9 sec.	LOS A
UVP/ Orcutt Expressway	Caltrans	Signal	0.62	LOS B	0.63	LOS B
UVP/Orcutt Road	County	Signal	0.46	LOS A	0.47	LOS A
<b>UVP/Hummel Drive(a)</b>	County	STOP-Sign	<b>34.7 sec.</b>	<b>LOS D</b>	<b>34.3 sec.</b>	<b>LOS D</b>
UVP/Bradley Road(a)	County	Signal	0.39	LOS A	0.51	LOS A
UVP/US 101 SB Ramps(a)	Caltrans	STOP-Sign	12.4 sec.	LOS B	15.0 sec.	LOS B
UVP/US 101 NB Ramps(a)	Caltrans	STOP-Sign	9.3 sec.	LOS A	9.4 sec.	LOS A

**Bolded Values exceed City/County LOS policy standards.**

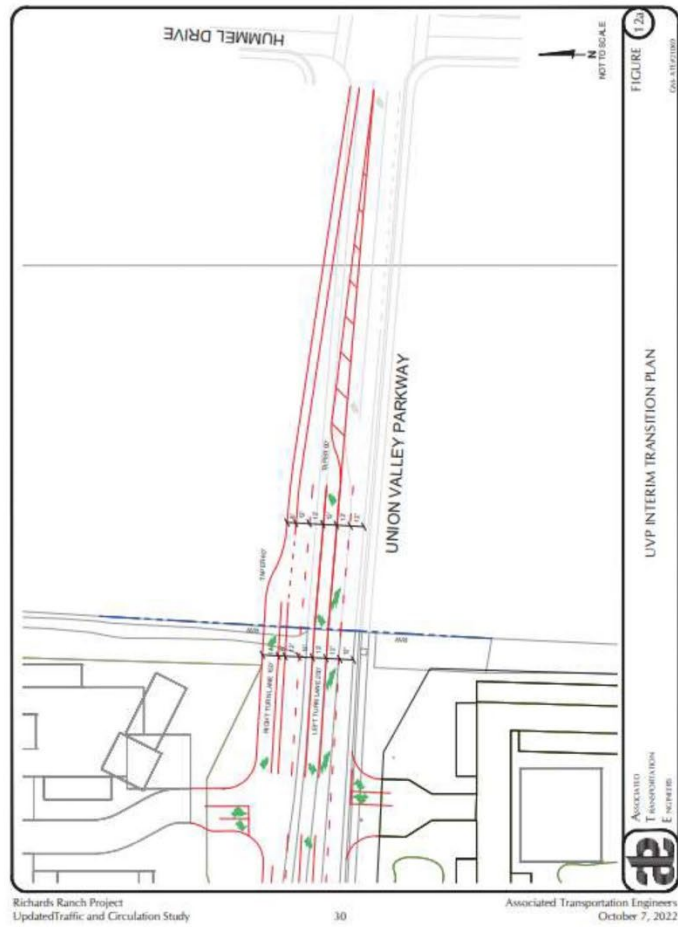
(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

The data presented in Table 2 show that the UVP/Hummel Drive intersection currently operates in the LOS D range during the AM and PM peak hours, which exceeds the County's LOS C standard in this area. The remaining study-area intersections currently operate in the LOS A-C range during the AM and PM peak hours, which meet the City's LOS D operating standard and the County's LOS C - D operating standard.

#### TRAFFIC POLICY STANDARDS

As noted in Table 2, several of the study-area intersections are located in the City of Santa Maria and several of the intersections are located in the County of Santa Barbara. Both the City and County traffic consistency standards were therefore utilized to assess the Project's traffic additions. There are additional intersections that are under Caltrans' jurisdiction. The current Caltrans Transportation Impact Study Guide is based on VMT and not LOS, thus the VMT section of this report addresses the Caltrans requirements.

<sup>3</sup> Highway Capacity Manual, Transportation Research Board, 6<sup>th</sup> Edition, 2016.



BG 2-3  
(cont'd)

#### UVP/Hummel Drive Intersection

County staff have indicated that the ultimate plan for the UVP adjacent to the Hummel Drive intersection is to widen UVP from two lanes to four lanes with left-turn channelization. This widening will occur west of Hummel Drive to match the four lanes in front of the Project site. In addition, County staff indicated that traffic signals may be installed at the UVP/Hummel Drive intersection in the future. Figure 18 provides a schematic illustration of the future intersection design with the widening. Table 20 presents the Existing + Project and Cumulative + Project levels of service forecasts for the intersection assuming implementation of the improvements.

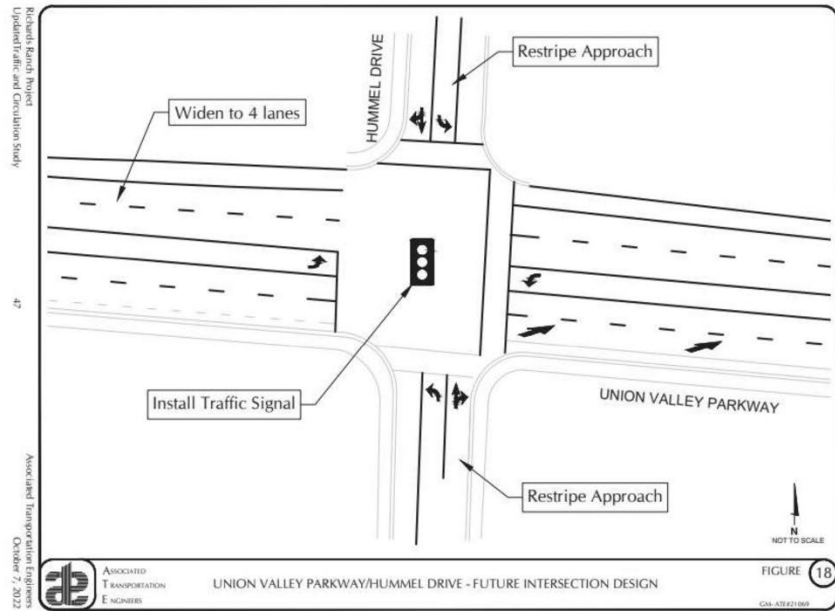
**Table 20**  
**Intersection Levels of Service With Improvements**

Intersection	Existing + Project		Cumulative + Project	
	Existing Geometry	With Improvements	Existing Geometry	With Improvements
UVP/Hummel Drive AM(a)	> 50.0 sec. / LOS F	0.47 / LOS A	> 50.0 sec / LOS F	0.49 / LOS A
UVP/Hummel Drive PM(a)	> 50.0 sec. / LOS F	0.49 / LOS A	> 50.0 sec / LOS F	0.52 / LOS A

(a) Assumes UVP widening and traffic signal installation.

The data presented in Table 20 show that with the planned improvements, the UVP/Hummel Drive intersection will operate in the LOS A range.

BG 2-3  
(cont'd)



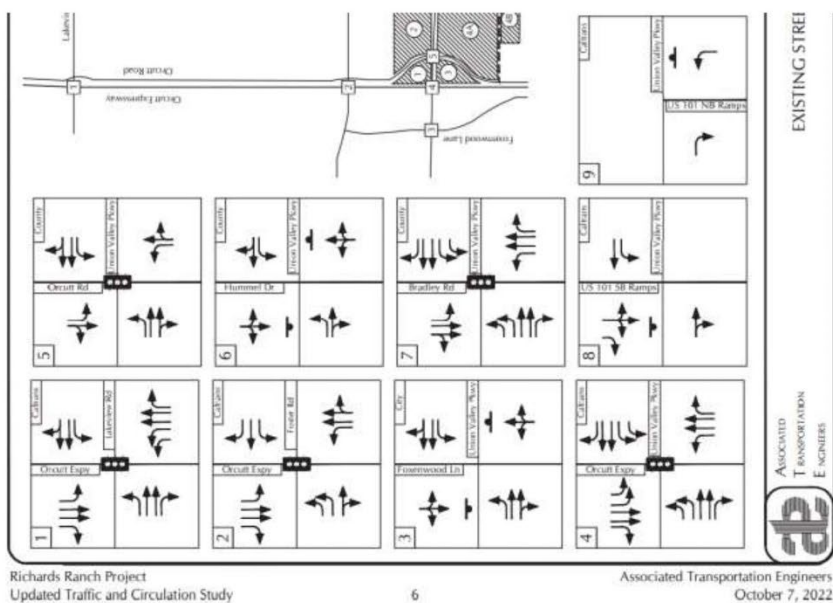
BG 2-3  
(cont'd)

Table 20  
Intersection Levels of Service With Improvements

Intersection	Existing + Project		Cumulative + Project	
	Existing Geometry	With Improvements	Existing Geometry	With Improvements
UVP/Hummel Drive AM(a)	> 50.0 sec. / LOS F	0.47 / LOS A	> 50.0 sec. / LOS F	0.49 / LOS A
UVP/Hummel Drive PM(a)	> 50.0 sec. / LOS F	0.49 / LOS A	> 50.0 sec. / LOS F	0.52 / LOS A

(a) Assumes UVP widening and traffic signal installation.

The data presented in Table 20 show that with the planned improvements, the UVP/Hummel Drive intersection will operate in the LOS A range.



BG 2-3  
(cont'd)

### Parcel 4B Access and Circulation

This parcel is located south of Parcel 4A and east of the Gloria Dei Lutheran Church on Orcutt Road. Parcel 4B would contain 95 townhome units. As shown on residential site plan (see Figure 2b) access to the site is proposed via a new east-west access road that would extend easterly from Orcutt Road between Parcels 4A and 4B. **Secondary access would be provided through the internal road system in the adjacent Parcel 4A which provides access to the UVP.** Figure 14 shows the access improvements that should be considered for Parcel 4B, which are reviewed below.

1. Orcutt Road should be widened north and south of the driveway to provide a southbound left-turn lane at the new roadway connection.
2. The new roadway approach should be controlled by stop signs.
3. Pedestrian connections should be provided between the sidewalks on Orcutt Road and the proposed apartment buildings.

Richards Ranch Project  
Updated Traffic and Circulation Study

- 33 -

Associated Transportation Engineers  
October 7, 2022

BG 2-3  
(cont'd)

Associated Transportation Engineers Trip Generation Worksheet																
RICHARDS RANCH - SANTA MARIA (#2108) - WITH NO INTERNAL TRIP FACTOR																
Use	Size	Internal Factor	ADT		AM PEAK HOUR				PM PEAK HOUR							
			Rate	Trips	Rate	Trips	In %	Trips	Out %	Trips	Rate	Trips		In %	Trips	Out %
<b>COMMERCIAL</b>																
High Turnover Sit Down Restaurant (a)	5,000 SF	1.00	107.20	536	9.57	48	55%	26	45%	22	9.05	45	61%	27	38%	18
3 Restaurants without Drive Thru (b)	5,000 SF	1.00	97.14	583	1.43	9	50%	5	50%	4	12.55	75	53%	41	43%	34
8 Drive Thru Restaurants (c)	18,750 SF	1.00	407.48	8,795	44.61	830	51%	426	49%	410	33.03	819	52%	322	48%	297
Shopping Center (d)	55,000 SF	1.00	94.49	5,197	3.53	194	62%	120	38%	74	9.84	541	48%	260	52%	281
Gas Station with Mart (e)	10 Fueling Positions	1.00	200.80	2,008	10.06	181	50%	81	50%	80	18.42	164	50%	92	50%	92
Car Wash-Automated (f)	1 Turnbay	1.00	249.00	249	8.50	9	50%	5	50%	4	23.70	24	50%	12	50%	12
Lube Station (g)	3 Bays	1.00	40.00	120	3.00	9	67%	6	33%	3	4.85	15	56%	8	44%	7
Mini Storage (h)	39,500 SF	1.00	1.43	97	0.09	4	59%	2	41%	2	0.15	6	47%	3	53%	3
Subtotals:	124,250 SF			17,515		1,278	671		589	1,509		785		744		
<b>RESIDENTIAL</b>																
Three Story Apartments (i)	400 DU	1.00	6.55	2,539	0.37	147	24%	35	76%	112	0.48	193	62%	122	37%	71
Two Story Townhomes (j)	95 DU	1.00	6.85	627	0.37	35	24%	8	76%	27	0.48	46	62%	29	37%	17
Subtotals:	495 DU			3,266		182	43		138	239		191		88		
Totals:				20,781		1,462	714		728	1,748		916		832		

(a) Trip generation based on ITE values for High-Turnover (Sit-Down) Restaurant (ITE #602) Average Rate.  
 (b) Trip generation based on ITE values for Fast Casual Restaurant (ITE #603) Average Rate.  
 (c) Trip generation based on ITE values for Fast Food Restaurant with Drive-Through Window (ITE #604) Average Rate.  
 (d) Trip generation based on ITE values for Shopping Plaza (ITE #621) Average Rate for ADT and AM Peak Hour. Fitbit Curve Equation for PM Peak Hour.  
 (e) Trip generation based on ITE values for Convenience Store/Gas Station (ITE #645). Fitbit Curve Equation for ADT. Average Rate for AM/PM Peak Hours.  
 (f) Trip generation for Car Wash-Automated derived from local studies.  
 (g) Trip generation based on ITE values for Quick Lubrication Vehicle Shop (ITE #641) Average Rate.  
 (h) Trip generation based on ITE values for Mini-Storage (ITE #101).  
 (i) Trip generation based on ITE values for Multifamily Housing (Low-Rise) (ITE #620) Fitbit Curve Equation.

TRIP TYPE	ADT	AM PEAK	PM PEAK
Internal (32% ADT, 13% AM, 45% PM) (45% for Car Wash)	6,272	182	787
External (70% ADT, 87% AM, 55% PM) (45% for Car Wash)	14,509	1,280	961



### Existing + Project Intersection Operations

Levels of service were calculated for the study-area intersections assuming the Existing + Project traffic volumes shown on Figure 7. Tables 8 and 9 compare the Existing and Existing + Project level of service forecasts and identify the Project's consistency with the City's LOS D standard and the County's LOS C – D standard.

**Table 8**  
**Existing + Project Levels of Service – AM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.61	LOS B	0.63	LOS B	Yes
Orcutt Expressway /Foster Rd	0.71	LOS C	0.74	LOS C	Yes
UVP/Foxenwood Ln (a)	14.3 sec.	LOS B	15.8 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.62	LOS B	0.67	LOS B	Yes
UVP/Orcutt Road	0.46	LOS A	0.73	LOS C	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.7 sec.</b>	<b>LOS D</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.39	LOS A	0.42	LOS A	Yes
UVP/US 101 SB Ramps (a)	12.4 sec.	LOS B	13.2 sec.	LOS B	Yes
UVP/US 101 NB Ramps(a)	9.3 sec.	LOS A	9.4 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

**Table 9**  
**Existing + Project Levels of Service – PM Peak Hour**

Intersection	Existing		Existing + Project		Consistent?
	ICU or Delay	LOS	ICU or Delay	LOS	
Orcutt Expressway/Lakeview Rd	0.66	LOS B	0.69	LOS B	Yes
Orcutt Expressway /Foster Rd	0.64	LOS B	0.66	LOS B	Yes
UVP/Foxenwood Ln (a)	9.9 sec.	LOS A	10.2 sec.	LOS B	Yes
UVP/ Orcutt Expressway	0.63	LOS B	0.70	LOS B	Yes
UVP/Orcutt Road	0.47	LOS A	0.64	LOS B	Yes
<b>UVP/Hummel Drive (a)</b>	<b>34.3 sec.</b>	<b>LOS D</b>	<b>&gt; 50.0 sec.</b>	<b>LOS F</b>	<b>No</b>
UVP/Bradley Road	0.51	LOS A	0.54	LOS A	Yes
UVP/US 101 SB Ramps (a)	15.0 sec.	LOS B	16.6 sec.	LOS C	Yes
UVP/US 101 NB Ramps(a)	9.4 sec.	LOS A	9.5 sec.	LOS A	Yes

**Bolded Values exceed City/County LOS policy standards.**

(a) Unsignalized intersection. LOS based on average weighted control delay per vehicle in seconds.

BG 2-3  
(cont'd)

#### 4.7.1.8 Santa Maria Public Airport Influence Area

The closest edge of the project site is located approximately 5,045 feet (0.96 mile) from the end of the runway of the Santa Maria Public Airport. The site is entirely within the Airport Influence Area (AIA) of the Airport. In 1993, the Santa Barbara County Association of Governments (SBCAG) adopted the *Santa Barbara County Airport Land Use Plan* (1993 ALUP) to complement and enhance the local planning process of agencies responsible for the land use in areas surrounding the Santa Barbara Municipal Airport and Santa Maria Public Airport. Since the adoption of the 1993 ALUP, a Draft Santa Maria Airport Land Use Compatibility Plan was prepared in August 2019 and updated in 2022 (2022 Draft ALUP) and is anticipated to be adopted by SBCAG in November 2022. Draft ALUPs have been prepared for each of the public airports within Santa Barbara County. When adopted, the ALUP for each airport would replace the 1993 ALUP adopted by SBCAG.

##### 1993 ALUP

Most of the project site, including the northern and eastern portions of the site, is located within Safety Area 2 of the 1993 ALUP (SBCAG 2008; see [Figure 4.7-1](#)). Safety Area 2 identifies areas in which uses that do not result in a concentration of people or particular safety hazard are generally allowed. Height restrictions in Safety Area 2 are generally more restrictive than in other safety areas and are strictly enforced. As a general rule, buildings within this zone are not permitted to extend beyond 150 feet above the established airport elevation. The City Zoning Ordinance applies more strict height standards for all zoning designations within the city as compared to the 1993 ALUP.

##### 2022 DRAFT ALUP

Based on the 2022 Draft ALUP, the northeastern corner of the project site is located within the 60- to 65-decibel (dB) noise contour for the Santa Maria Public Airport ([Figure 4.7-2](#)). The 2022 ALUP provides compatibility guidance for uses within the community noise equivalent level (CNEL) contours. Residential uses are identified as potentially compatible in areas within the 60- to 65-dB CNEL noise contour, provided that they are not located within 1 mile of an aircraft runway. In addition, residential building structures within the 60- to 65-dB CNEL noise contour must be capable of attenuating exterior noise to 45 dB indoor CNEL, which usually can be met through standard construction methods. Office buildings, retail sales, and mini/other storage uses are identified as compatible uses within the 60- to 65-dB CNEL noise contour (SBCAG 2022).

4.7-4

*Richards Ranch Annexation Environmental Impact Report*  
**Section 4.7 Hazards and Hazardous Materials**

Portions of the northeast corner of the project site are located within the 2022 Draft ALUP Safety Zone 2 and Safety Zone 4; the majority of the project site is located within Safety Zone 6 (see [Figure 4.7-2](#)). To minimize risks to people and property on the ground and to people onboard aircraft, the 2022 Draft ALUP establishes safety compatibility criteria to set limits on the density of residential development, the intensity of nonresidential development, the development or expansion of certain uses that represent special safety concerns, and the extent to which development covers the project site. These safety compatibility criteria would guide the types and density of land use development that could be established within the respective safety zones overlaying the project site.

BG 2-3  
(cont'd)

Richards Ranch Annexation Environmental Impact Report  
Section 4.7 Hazards and Hazardous Materials

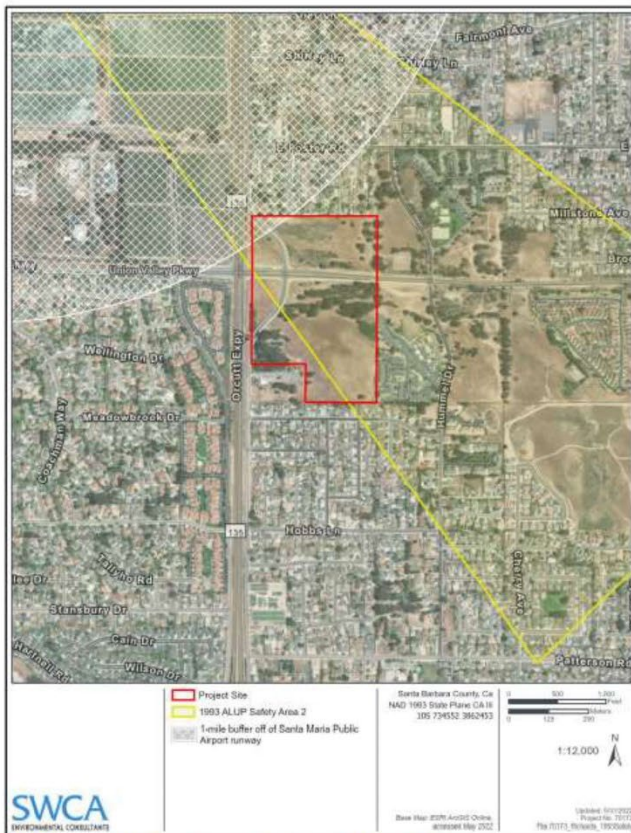


Figure 4.7-1. 1993 ALUP Safety Area 2 for the Santa Maria Public Airport.

4.7-5

BG 2-3  
(cont'd)

**From:** mr gnibus  
**Sent:** Monday, February 27, 2023 1:09 PM  
**To:** Dana Eady  
**Subject:** BobG 27Feb2023 RE: Richards Ranch Meeting - Additional EIR comments

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dana,  
Yes, please add these comments to my previous comments on the EIR.  
Thank you  
Bob Gnibus

IBG 3-1

**From:** Dana Eady  
**Sent:** Monday, February 27, 2023 10:35 AM  
**To:** mr gnibus  
**Subject:** RE: BobG 26Feb2023 RE: Richards Ranch Meeting - February 28, 2023 at 6:30 p.m.

Bob,

I also wanted to ask if you would like these comments to be included in your comments on the EIR? I have your previous comments but can add these as well if you would like.

Thanks,  
Dana

**From:** mr gnibus  
**Sent:** Sunday, February 26, 2023 2:45 PM  
**To:** Dana Eady  
**Cc:** mr gnibus  
**Subject:** BobG 26Feb2023 RE: Richards Ranch Meeting - February 28, 2023 at 6:30 p.m.

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello Dana,  
Thank you for providing the below meeting notice.  
I plan on attending the meeting but was wondering if you could forward a copy of the attached PDF with my questions to Mr Michael Stoltey.  
It might give him an opportunity to prepare for the meeting before I ask my questions.  
Please advise if you recommend me sending a copy of the attached PDF to the Santa Barbara County LAFCO.  
Best regards,  
Bob Gnibus

IBG 3-2

**From:** Dana Eady  
**Sent:** Wednesday, February 22, 2023 2:06 PM  
**To:** Dana Eady  
**Subject:** Richards Ranch Meeting - February 28, 2023 at 6:30 p.m.

Hello,

I was notified today that Michael Stoltey, the property owner of the Richards Ranch property, has organized a meeting at Gloria Dei Lutheran Church on Orcutt Road at 6:30 p.m. on February 28<sup>th</sup>.

Here is the information that was provided to me by Mr. Stoltey in case you are interested in attending:

"We are excited to announce that we will be hosting a public forum to discuss our development project on Union Valley Parkway, and we would like to extend an invitation to you and your neighbors.

The purpose of this forum is to engage with the community and showcase some preliminary designs of the project. We believe it is crucial to involve the community in the development process, so we hope you can join us.

The public forum will take place on Tuesday the 28th at 6:30 PM at Gloria Dei Lutheran Church. If you are interested in attending, please feel free to join us. We also encourage you to spread the word and invite others who may be interested in this project.

Thank you for your time, and we hope to see you at the public forum"

Thank you,



Dana Eady  
Planning Division Manager  
City of Santa Maria  
110 South Pine Street Suite 101  
Santa Maria, CA 93458  
Ph: (805) 925 -0951 Ext. 2444  
E-mail: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

Richards Ranch Annexation Project (*Questions for 28Feb2023 Meeting*)

Dana Eady, Planning Division Manager, City of Santa Maria California

[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

- 1) Will military aircraft be prohibited from flying over the 2&3 story structures in the Richards Ranch Annexation Project (e.g., military jets, military cargo planes, vertical takeoff aircraft)?
- 2) Will the Developers pay for all new Golden State Water “offsite” infrastructure to support the Richards Ranch Annexation Project? See Table 2-5 in Section 2.5.5  
OR – will my water bill increase to pay for the “offsite” infrastructure for this development?
- 3) Will the Richards Ranch Annexation Development be responsible for all costs associated with the supplemental water purchased from the City of Santa Maria?  
OR – will my water bill increase due to the purchase of supplemental water into the Golden State water system?
- 4) Will the Richards Ranch Annexation Development connect to the recycle water system that was recently installed at Waller Park to irrigate landscaping and parks in the new Development?
- 5) It appears any Parks in the Project will only be available to City Residents even though it will be surrounded by County Residents of the Orcutt community. “ ..... as shown in the conceptual development plan, an approximate 2-acre area is identified to be dedicated to open space/park uses in the southwestern portion of the of the project site where the southern terminus of Orcutt Road meets SR 135 ..... “ will this be a community Park for City and County residents or controlled by the Project HOA?

Also, Figure 2-3 (see below screen shots) does not appear to show a 2-acre area for open space/park uses. The C2 Commercial area along SR 135, South of UVP and West of Orcutt Road is listed as 2.33 acres. Nothing in the Park residential area in Figure 2-3 shows a 2-acre open space/park use. However, Alternate 2, Figure 5-2 does appear to have a nice layout for open space and park use.

BG 3-3

BG 3-4

BG 3-5

**Objective 9.1.a(1).** Maintain a high-quality, diverse park system which enhances and builds on the variety of community values and provide adequate park acreage and recreation facilities to serve the needs of present and future residents.

The intent of this objective is to provide high-quality park and recreation facilities for city residents.

**Potentially Consistent.** The conceptual development plan includes neighborhood parks, a pool, and a clubhouse that would be easily accessible to onsite residents for recreational uses.

See below screen shots from the Draft EIR and attachments

City Government • Departments • Community Development • Planning Division • Planning Policies and Regulations

## DOCUMENTS OUT FOR PUBLIC REVIEW

Font Size: [A](#) [A](#) [A](#) [Share & Bookmark](#) [Print](#)

### Environmental Review And Documents

The City considers the potential effects of all discretionary projects based on the California Environmental Quality Act (CEQA). Based on CEQA, many small projects are exempt from environmental review. This webpage provides environmental documents for projects that are not exempt, and required an Environmental Impact Report (EIR), Mitigated Negative Declaration (MND) or Negative Declaration (ND) in recent years. Environmental documents from earlier years are available in the Planning Division of the Community Development Department.

Below is a brief description of the types of documents listed on this webpage.

A **Negative Declaration (ND)** is a document prepared when an initial study of the project finds that there would be no significant impacts from the project.

A **Mitigated Negative Declaration (MND)** is a document prepared when an initial study of the project identifies potential impacts, but the project applicant revises the project or includes mitigation measures that reduces these impacts to less than significant levels.

An **Environmental Impact Report (EIR)** is a detailed document, normally prepared when an initial study of the project identifies significant impacts that cannot be clearly mitigated. The EIR describes and analyzes the impacts of a project and discusses ways to reduce or avoid the impacts. In some cases, the impacts may be unavoidable and a Statement of Overriding Considerations is necessary.

### Draft Documents Available for Public Review and Comment

Project Title:	Documents:	Location	Public Comment Period:	Contact:
Richards Ranch Annexation (AN2021-0001)	<a href="#">Richards Ranch Annexation Draft EIR</a> <a href="#">EIR Appendix for Richards Ranch Annexation</a> <a href="#">Notice of Availability for Richards Ranch Annexation</a>	Northeast and Southeast of the intersection of State Route 135 and Union Valley Parkway	December 22, 2022 to February 6, 2023	<a href="#">Dana Eady</a>

3-separate documents

Richards Ranch Annexation Draft EIR

EIR Appendix for Richards Ranch Annexation

Notice of Availability for Richards Ranch Annexation



**Screen shots supporting Question 1**

As noted in the Draft EIR (SCH # 2022020194)

The 1993 ALUP will be replaced by the 2022 DRAFT ALUP

The 2022 DRAFT ALUP does not seem to address recent military aircraft activities that fly very low directly over my house on Kenai Court and directly over the proposed Project (400 3-Story Apartments and 95 2-Story Townhomes) to the Santa Maria Airport

This seems like a risk that needs to be considered for the Richards Ranch Annexation Project due to current and future military activities at the Santa Maria Airport, especially the Airport Noise Contour in Figure 4.7-2 and the current 1993 ALUP Safety Area 2 in Figure 4.7-1

Richards Ranch Annexation Environmental Impact Report  
Section 4.10 Noise

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Jet Fly-over at 300m (1000 ft)	110	Rock Band

See below screen shot Figure 4.7-1 from p# 4.7-5, “1993 ALUP Safety Area 2 and Figure 4.7-2 from p# 4.7-7, “2022 Draft ALUP Safety Zones and Noise Contours for the Santa Maria Public Airport.

BG 3-6



#### DRAFT SANTA MARIA PUBLIC AIRPORT LAND USE COMPATIBILITY PLAN

Since the adoption of the 1993 ALUP, a Draft Santa Maria Public Airport Land Use Compatibility Plan was prepared in August 2019 and updated in 2022 (2022 Draft ALUP). SBCAG is expected to adopt the 2022 Draft ALUP in November 2022. This plan was developed with the purpose of providing for the orderly growth of the Santa Maria Public Airport and the areas surrounding the airport, safeguarding the general welfare of the inhabitants within the vicinity of the Santa Maria Public Airport, and the public in general.

Draft ALUPs have been prepared for each of the public airports within Santa Barbara County. When adopted, the ALUP for each airport would replace the 1993 ALUP adopted by SBCAG. Future development proposed within the project site may occur after the 2022 Draft ALUP has been adopted; therefore, this EIR also evaluates the project for consistency with this draft plan.

The 2022 Draft ALUP identifies policies that have the dual objectives of: 1) protecting against constraints on airport expansion and operations that can result from encroachment of incompatible land uses, and 2) minimizing the public's exposure to excessive noise and safety hazards. To meet these objectives, the 2022 Draft ALUP addresses potential airport compatibility impacts related to four specific airport-related factors:

1. Noise: Exposure to aircraft noise;
2. Safety: Land use that affects safety for both people on the ground and in aircraft;
3. Airspace Protection: Protection of airport airspace; and
4. **Overflight: Annoyance and other general other concerns related to aircraft overflights.**

The AIA for Santa Barbara Airport is divided into two subareas, Review Area 1 and Review Area 2. Review Area 1 consists of the compilation of the safety zones and noise contours for each airport. Review Area 2 consists of the overflight and airspace protection layer for each airport. The project is located within Review Area 2.

Portions of the northeast corner of the project site are located within the 2022 Draft ALUP Safety Zone 2 and Safety Zone 4; the majority of the project site is located within Safety Zone 6. Criteria for

BG 3-6  
(cont'd)

#### 4.7.1.8 Santa Maria Public Airport Influence Area

The closest edge of the project site is located approximately 5,045 feet (0.96 mile) from the end of the runway of the Santa Maria Public Airport. The site is entirely within the Airport Influence Area (AIA) of the Airport. In 1993, the Santa Barbara County Association of Governments (SBCAG) adopted the *Santa Barbara County Airport Land Use Plan* (1993 ALUP) to complement and enhance the local planning process of agencies responsible for the land use in areas surrounding the Santa Barbara Municipal Airport and Santa Maria Public Airport. Since the adoption of the 1993 ALUP, a Draft Santa Maria Airport Land Use Compatibility Plan was prepared in August 2019 and updated in 2022 (2022 Draft ALUP) and is anticipated to be adopted by SBCAG in November 2022. Draft ALUPs have been prepared for each of the public airports within Santa Barbara County. When adopted, the ALUP for each airport would replace the 1993 ALUP adopted by SBCAG.

##### 1993 ALUP

Most of the project site, including the northern and eastern portions of the site, is located within Safety Area 2 of the 1993 ALUP (SBCAG 2008; see [Figure 4.7-1](#)). Safety Area 2 identifies areas in which uses that do not result in a concentration of people or particular safety hazard are generally allowed. Height restrictions in Safety Area 2 are generally more restrictive than in other safety areas and are strictly enforced. As a general rule, buildings within this zone are not permitted to extend beyond 150 feet above the established airport elevation. The City Zoning Ordinance applies more strict height standards for all zoning designations within the city as compared to the 1993 ALUP.

##### 2022 DRAFT ALUP

Based on the 2022 Draft ALUP, the northeastern corner of the project site is located within the 60- to 65-decibel (dB) noise contour for the Santa Maria Public Airport ([Figure 4.7-2](#)). The 2022 ALUP provides compatibility guidance for uses within the community noise equivalent level (CNEL) contours. Residential uses are identified as potentially compatible in areas within the 60- to 65-dB CNEL noise contour, provided that they are not located within 1 mile of an aircraft runway. In addition, residential building structures within the 60- to 65-dB CNEL noise contour must be capable of attenuating exterior noise to 45 dB indoor CNEL, which usually can be met through standard construction methods. Office buildings, retail sales, and mini/other storage uses are identified as compatible uses within the 60- to 65-dB CNEL noise contour (SBCAG 2022).

4.7-4

Richards Ranch Annexation Environmental Impact Report  
Section 4.7 Hazards and Hazardous Materials

Portions of the northeast corner of the project site are located within the 2022 Draft ALUP Safety Zone 2 and Safety Zone 4; the majority of the project site is located within Safety Zone 6 (see [Figure 4.7-2](#)). To minimize risks to people and property on the ground and to people onboard aircraft, the 2022 Draft ALUP establishes safety compatibility criteria to set limits on the density of residential development, the intensity of nonresidential development, the development or expansion of certain uses that represent special safety concerns, and the extent to which development covers the project site. These safety compatibility criteria would guide the types and density of land use development that could be established within the respective safety zones overlaying the project site.

BG 3-6  
(cont'd)

Richards Ranch Annexation Environmental Impact Report  
Section 4.7 Hazards and Hazardous Materials

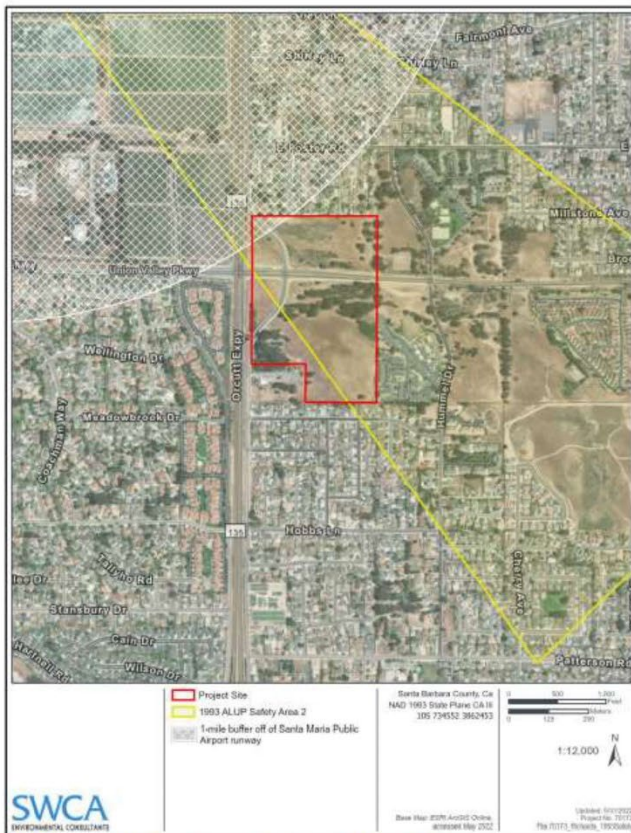


Figure 4.7-1. 1993 ALUP Safety Area 2 for the Santa Maria Public Airport.

4.7-5

BG 3-6  
(cont'd)

Richards Ranch Annexation Environmental Impact Report  
Section 4.7 Hazards and Hazardous Materials

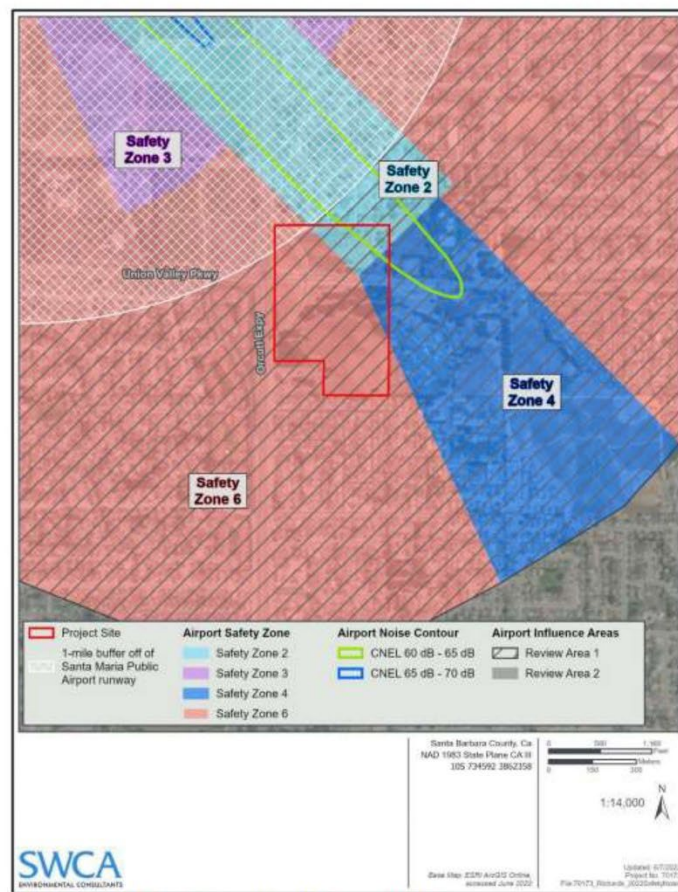


Figure 4.7-2. 2022 Draft ALUCP Safety Zones and noise contours.

4.7-7

BG 3-6  
(cont'd)



*Screen shots supporting Question 2 & 3*

Will this Project increase my Golden State Water bill?

**4. PROJECT OBJECTIVES**

The State CEQA Guidelines Section 15124 requires that a project description be accompanied by a statement of objectives sought by the project Applicant. The City and the Applicant have identified the following objectives for the project:

- To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to allow for the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.
- Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.
- Develop this infill property while respecting the surrounding existing neighborhoods. The project will include setback and landscaping buffers.
- Provide high-density housing to meet the needs of the city and help address the current Regional Housing Needs Allocation. The various types of housing units will be available for rent while others will be for-sale units.
- Provide commercial uses that will serve the daily needs of the new residents and the surrounding community including those traveling on Union Valley Parkway.
- Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.

BG 3-7

Utilities and Service Systems		
<b>USS Impact 1:</b> The project would require the construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities.	Implement <b>Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2, BIO/mm-1.1 through BIO/mm-1.5, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-5.1, and BIO/mm-11.1; CR/mm-2.1, GEO/mm-6.1 and GEO/mm-9.1; HAZ/mm-2.1 and HAZ/mm-2.2; HYD/mm-1.1 and HYD/mm-1.2, and NOI/mm-1.1.</b>	Less than Significant with Mitigation
<b>USS Impact 2:</b> <b>Golden State Water</b> would have sufficient <b>water</b> supply to serve the water demand generated by the proposed project and the existing service area during normal, single dry year, and multiple dry years conditions.	No mitigation is required.	Less than Significant
<b>USS Impact 3:</b> The LCSD would have adequate capacity to serve the increase in wastewater flows generated by the project.	No mitigation is required.	Less than Significant
<b>USS Impact 4:</b> The project could generate solid waste in excess of the capacity of local infrastructure or otherwise impair state or local solid waste reduction goals.	No mitigation is required.	Less than Significant

S-29

## 7. PROJECT ALTERNATIVES

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR summary identify the choice among project alternatives. Alternatives to the proposed project are discussed in detail in Chapter 5, Alternatives Analysis, of this EIR in accordance with Section 15126.6 of the State CEQA Guidelines. Alternatives required to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives. As evaluated in Chapter 4 of this EIR, the significant impacts of the proposed project would affect air quality and greenhouse gas; biological resources; cultural and tribal resources; energy; geology and soils; hazards and hazardous materials; hydrology and water quality; and noise and vibration. Chapter 5 of this EIR identifies, describes, and evaluates the following four alternatives.

- **No Project/No Build Alternative.** Section 15126.6(e) of the State CEQA Guidelines requires analysis of the No Project Alternative. In the No Project/No Build Alternative, implementation of the project would not occur. This alternative assumes no new development or changes would be introduced to the project site to provide a clear comparison of the project to existing (undeveloped) conditions. Additionally, the project site would not be annexed into the City of Santa Maria and would stay within the jurisdiction of the County of Santa Barbara. **Current water supply constraints at the project site** would remain unchanged.
- **Alternative 1: Existing Santa Maria General Plan Land Use Designation.** The project site is located within the City's Sphere of Influence and therefore has associated planned land use designations as presented in the City's General Plan Land Use Element. Alternative 1 would include annexation of the project site into Santa Maria city limits and would allow the project site to be developed in accordance with the City's existing planned land use designation for the site, which is Commercial and Professional Office. A complementary zoning designation of

S-31

Therefore, Alternative 2 would be considered the Environmentally Superior Alternative. Alternative 2 would reduce the project's significant impacts while successfully meeting the basic project objectives. While Alternative 2 is similar to the proposed project in that it would provide a mixture of residential and commercial uses, it is not known whether the Applicant would be interested in developing this alternative

S-32

BG 3-7  
(cont'd)

## 2.4 PROJECT OBJECTIVES

The State California Environmental Quality Act (CEQA) Guidelines Section 15124 requires that a project description be accompanied by a statement of objectives sought by the project Applicant. The guidelines state that the “objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

The City and the Applicant have identified the following objectives for the project:

- To facilitate development of the site, provide for annexation of the Richards Ranch property to the City of Santa Maria to allow for the use of City supplemental water supplies consistent with the Santa Maria Groundwater Basin adjudication.
- Develop an economically feasible plan that is compatible with the surrounding community and designed to serve the housing and commercial needs of the city and region.
- Develop this infill property while respecting the surrounding existing neighborhoods. The project will include setback and landscaping buffers.
- Provide high-density housing to meet the needs of the city and help address the current Regional Housing Needs Allocation. The various types of housing units will be available for rent while others will be for-sale units.
- Provide commercial uses that will serve the daily needs of the new residents and the surrounding community including those traveling on UVP.
- Establish sufficient land to accommodate the needs for onsite stormwater retention in an aesthetically pleasing manner that can be planned for recreational uses.

BG 3-7  
(cont'd)

## 2.5.5 Infrastructure and Utilities

Future development of the project site per the conceptual development plan would require a full range of onsite infrastructure improvements as well as several improvements that would be necessary outside of the boundaries of the 43.75-acre project site. Off-site project areas include locations where necessary water and wastewater-related improvements would be necessary to serve the future buildout of the project. Based on correspondence with the infrastructure providers that are expected to serve the project, an initial identification of water and wastewater requirements are listed in Table 2-5. Appendix B provides schematic drawings of the planned infrastructure and utilities improvements included in the project description.

**Table 2-5. Infrastructure and Utilities**

Type of Improvement	Location/Improvement Description
Water	Proposed onsite water delivery infrastructure would include an internally looped system of 8-inch public water main line, which would provide potable water and fire suppression water supplies within the project site. Off-site improvements would include Golden State Water Company water system improvements, including main/system upgrades under Orcutt Road and UVP.
Wastewater	The anticipated sewer connection for the project is LCSD sewer manhole ID MH1010, located near the northwest corner of the project site in Orcutt Road (adjacent to the driveway of the property located at 4174 Orcutt Road). LCSD wastewater system improvements would include upsizing the existing downstream sewer pipe from a 6-inch-diameter pipe to an 8-inch-diameter pipe from MH1010 to Foster Road (approximately 675 feet of pipeline).

The exact size and extent of the infrastructure upgrades listed in Table 2-5 are not known at this time (e.g., the size of the water mains to be installed). However, for purposes of this environmental analysis, it is assumed that all the infrastructure required beyond the 43.75-acre project site would be within existing roadway right-of-way. Based on conversations with the utility providers, it is not anticipated that any additional offsite infrastructure improvements would be required.

### 2.5.5.1 Potable Water

Delivery of potable water to the project would be provided by Golden State Water. Within the 43.75-acre project site, the water delivery system would include an internally looped system of 8-inch public water main line, which would provide potable water and fire suppression water supplies to the project site. These water lines would be routed below the proposed public roads identified within the project site. The private main line system for the commercial areas would be protected at each connection point to the public system with a double detector check assembly. Individual service connections would connect to the 8-inch domestic main lines. Water lines are proposed to be routed within private driveways, streets, or easements and would include fire hydrants located adjacent to roadways and spaced as required by state law and the City Fire Marshal.

In addition, as described above, it is anticipated that Golden State Water would require that the water mains under Orcutt Road and UVP be upgraded to larger-capacity water mains to accommodate the development of the project site. Golden State Water has not identified the exact size nor extent of these water main upgrades. Based on the information provided by Golden State Water, it is assumed that the water main upgrades would be limited to pipelines that would be replaced underneath paved roads and/or within existing rights-of-way.

BG 3-7  
(cont'd)



#### GROUNDWATER SUPPLY

Future development of the project site would not directly pump local groundwater to serve the project's water demand. Domestic water and water for fire protection would be supplied by Golden State Water. The project site is within Golden State Water's Orcutt Service Area, which is managed by the 2020 Orcutt Service Area UWMP. The primary water supply for this service area consists of groundwater pumped from the Santa Maria Valley Groundwater Basin through Golden State Water's wells. SWP supplies purchased directly from Central Coast Water Authority, water contracts with City of Santa Maria, and associated return flows that may be recaptured by Golden State Water from the Santa Maria Valley Groundwater Basin (Tully and Young 2021).

The project is subject to the supplemental water requirement pursuant to the Court-adopted Stipulation in *Santa Maria Valley Water Conservation District v City of Santa Maria, et al.* (and related actions), Lead Case No. CV 770214, Superior Court of the State California, County of Santa Clara, in January 2008, and Commission Decision No. 13-05-011, therefore, a source of supplemental water to offset the increased water demand must be provided. Based on Golden State Water's Preliminary Can and Will Serve Letter,

4.8-12

BG 3-7  
(cont'd)

*Richards Ranch Annexation Environmental Impact Report*  
**Section 4.8 Hydrology and Water Quality**

Golden State Water does not currently have any available supplemental water to serve the project. Therefore, the project would be required to a source of supplemental water.

Golden State Water calculated water demand for the project consistent with their methodology to estimate the supplemental water needed to serve the project (Todd Groundwater 2022). The annual water demand for the project is approximately 149.05 acre-feet per year. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. Agreement details would need to be formalized and would occur after annexation.

The City derives its water supply primarily from imported SWP water and from local groundwater. The City's water supply is expected to reliably meet the projected water demand and have an available water supply in excess through 2045, with most of the demand being met by imported SWP water. The City has adequate supplemental water from its various water rights to provide for this project when annexed (Todd Groundwater 2022).

Screen shots supporting Question 5

Community access to Parks (City and County Residents)?

**Objective 9.1.a(1).** Maintain a high-quality, diverse park system which enhances and builds on the variety of community values and provide adequate park acreage and recreation facilities to serve the needs of present and future residents.

The intent of this objective is to provide high-quality park and recreation facilities for city residents.

**Potentially Consistent.** The conceptual development plan includes neighborhood parks, a pool, and a clubhouse that would be easily accessible to onsite residents for recreational uses.

The project site is currently undeveloped. The County's General Plan identifies the project site as being within the General Commercial/Office and Professional/Planned Development-3.3 General Plan designation and the Orcutt Community Plan (1997) identifies the project site as "Key Site 26 (Richards)" and also designates the site for residential and commercial development.

The project site's location within the City's SOI indicates that annexation and future development of this site was planned for and has been taken into consideration in planning other land uses and infrastructure in the area. Development of land uses on the project site would likely be similar regardless of whether the project site is annexed into the city of Santa Maria or if the site were to remain in the County's

4.9-43

BG 3-8

Richards Ranch Annexation Environmental Impact Report  
Section 4.9 Land Use and Planning

unincorporated area. In addition, future development of commercial and residential uses onsite would serve city residents, residents of the community of Orcutt, and the general region. Therefore, the project would not physically divide an established community and potential impacts would be *less than significant*.

LUP Impact 1
The project would not include features that would physically divide an established community.
<b>Mitigation Measures</b>
No mitigation is required.
<b>Residual Impacts</b>
Impacts associated with division of an established community would be <i>less than significant</i> .

## PARKS

Implementation of the project would result in an estimated increase of 1,846 new residents as well as employees and patrons of new commercial-retail development over an anticipated 3-year buildout, introducing a new resident population that would increase the demand on existing park and recreational facilities. The City aims to provide 3 to 5 acres of parkland per every 1,000 residents. Based on the 2020 population of 107,445 residents, the City would need to provide 322.34 to 537.23 acres of parkland to meet the standard level of service. The City currently provides a total of 271 acres of developed parkland, resulting in 2.5 acres of parkland per every 1,000 residents. With the projected increase in population of 1,846 new residents, the level of service would be incrementally reduced to 2.47 acres of parkland per every 1,000 residents. The project would need to provide approximately 1.85 acres of parkland to maintain to the City's current parkland level of service.

As shown in the conceptual development plan (Chapter 2, Figure 2-3), the project would include several internal pocket park areas intended for use by future residents. The conceptual development plan also identifies an approximate 2-acre area to be dedicated to open space/park uses in the southwestern portion of the project site where the southern terminus of Orcutt Road meets SR 135. Given the conceptual nature of the plan, details of the proposed open space/park uses on the project site are unknown; however, it is anticipated that park spaces would be constructed concurrently with the associated residential development. Inclusion of these open space/park areas within the project site would contribute to the parkland that future residents could access.

BG 3-8  
(cont'd)

Richards Ranch Annexation Environmental Impact Report  
Chapter 5 Alternatives Analysis



Figure 5-2. Alternative 2: Tree Preservation and Reduced Housing Density.

Richards Ranch Annexation Environmental Impact Report  
Chapter 2 Project Description



Figure 2-3. Conceptual development plan.

BG 3-8  
(cont'd)

### 1.4.2.1 Response to Letters from Bob Gnibus

Comment No.	Response
BG 1-1	<p>The comment raises concern related to an increase in traffic congestion along roadways within the project area. In addition, the commenter indicates that the traffic analysis should consider additional traffic from the Dancer Avenue extension or that Dancer Avenue should not provide through access, except for emergency access.</p> <p>Refer to MR-3, which addresses comments related to the transportation system. MR-3 and the traffic analysis provided in the Traffic and Circulation Study contained in Appendix C of the EIR address all the specific comments raised by the commenter. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
BG 1-2	<p>The comment raises concern related to building height hazards near Santa Maria Airport. Refer to MR-4, which addresses comments related to airport hazards.</p>
BG 1-3	<p>The commenter has included select pages from the Draft EIR.</p>
BG 2-1	<p>The comment raises concern related to an increase in traffic congestion along roadways within the project area. Refer to MR-3, which addresses comments related to the transportation system.</p>
BG 2-2	<p>The comment raises concern related to building height hazards near Santa Maria Airport. Refer to MR-4, which addresses comments related to airport hazards.</p>
BG 2-3	<p>The commenter has included select pages from the Draft EIR.</p>
BG 3-1	<p>The comment introduces the comment letter, which does not identify any specific concerns with the EIR requiring a response.</p>
BG 3-2	<p>The comment asks that the City provide a letter with specific questions to the Applicant so that he is prepared before the public meeting, which was held on February 28, 2023. This comment does not identify any specific concerns with the EIR requiring a response.</p>
BG 3-3	<p>The comment specifically asks whether military aircraft would be prohibited from flying over the proposed Richards Ranch structures and, generally, raises concern related to building heights hazards near Santa Maria Airport.</p> <p>The City nor the Applicant can prohibit military aircraft from flying over the project site. MR-4 addresses comments related to airport hazards. Regarding noise associated with the aircraft, the EIR considers the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant.</p> <p>It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports. Refer also to MR-12, which responds to comments related to noise, including aircraft-related noise.</p> <p>Regarding hazards associated with the Santa Maria Airport, Refer to MR-4, which responds to comments related to airport hazards.</p>

Comment No.	Response
BG 3-4	<p>The comment raises concern related to costs associated with expanded Golden State Water Company (Golden State Water) infrastructure, and inquires about the project utilizing recycled water.</p> <p>Refer to MR-6, which responds to comments related to water supply and associated costs. Economic impacts are generally not considered environmental impacts under the CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. As such, the rates and costs associated with the provision of water through Golden State Water are not addressed in the EIR. The City does not have visibility into the specifics of Golden State Water's rate structure. As a general matter, Golden State Water's ability to extend water service to new customers is done pursuant to California Public Utilities Commission's approved rules and regulations applicable to Golden State Water.</p> <p>As indicated in Golden State Water's Can and Will Serve Letter for the project, all costs associated with improvements to or new main extensions, water supply, water storage and any additional water appurtenances would be paid by the Applicant and contributed to Golden State Water. Further, Golden State Water would provide water service to the project, under the same terms and conditions as its existing customers.</p> <p>At this time, planned connections to the recycled water system are not anticipated; however, during the Planned Development Permit process, it would be determined if such connections were appropriate. This EIR does not consider the environmental effects of connecting to the recycled water system.</p>
BG 3-5	<p>The comment raises questions related to the project's proposed park and recreation uses.</p> <p>As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Park and open space areas within the project site would be considered as part of the overall project development and would not result in physical impacts on the environment outside of those described in this EIR. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>Potential environmental impacts associated with the provision of public park facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p> <p>Refer also to MR-7, which responds to comments related to recreation and open space.</p>
BG 3-6	<p>The comment raises concern related to hazards related to aircraft and current and future military activities at the Santa Maria Airport. Refer to MR-4, which addresses comments related to airport and aircraft hazards.</p>
BG 3-7	<p>The comment raises concern related to costs associated with expanded Golden State Water Company (Golden State Water) infrastructure and asks whether the project would result in an increase in the water bills to other Golden State Water customers.</p> <p>Refer to response to comment BG 3-4 and MR-6, which responds to comments related to water supply and associated costs.</p>
BG 3-8	<p>The comment provides additional information and pages from the Draft EIR related to Comment BG 3-5. Refer to the response to comment BG 3-5 and MR-7, which provides response to comments related to recreation and open space.</p>



## 1.4.3 Susan Bryant

### Bobbette Biddulph

**From:** Bobbette Biddulph  
**Sent:** Monday, January 16, 2023 9:02 AM  
**To:** Bobbette Biddulph  
**Subject:** RE: Richards Ranch draft EIR public comments

**From:** susan bryant <bryantsb7@gmail.com>  
**Sent:** Friday, January 13, 2023 8:29 AM  
**To:** Dana Eady <deady@cityofsantamaria.org>  
**Cc:** Nelson, Bob <bnelson@countyofsb.org>; Hartmann, Joan <jhartmann@countyofsb.org>;  
steve.lavagino@countyofsantabarbara.org; Alice Patino <apatino@cityofsantamaria.org>; Gloria Soto  
<gsoto@cityofsantamaria.org>; Maribel Aguilera-Hernandez <maribel.hernandez@cityofsantamaria.org>; Carlos  
Escobedo <cescobedo@cityofsantamaria.org>; Mike Cordero <mcordero@cityofsantamaria.org>; Esau Blanco  
<eblanco@cityofsantamaria.org>; tomlopezremotemail@cityofsantamaria.org; rdickerson@cityofsantamaria.org;  
nmoreno@santamariaairport.com; dbaskett@santamariaairport.com; mclayton@santamariaairport.com; Citizens  
Planning Association <citizensplanningsb@gmail.com>; ken@sbcan.org  
**Subject:** Richards Ranch draft EIR public comments

Since I am on the notification list and have not heard of any delay or postponement for this EIR/City annexation hearing, I assume it will still occur on January 17 at 3:30 p.m. at the Santa Maria Public Library's Learning Center.

Knowing everyone in the Orcutt community and their County representatives are probably overwhelmed handling flooding issues, I am reluctantly sending these comments out now. But it seemed important for them to go out before the hearing.

Comments follow.

**One thousand seven hundred sixty-five pages (1,765)?** That is the length of this EIR. It seems naive to think that this EIR was intended to be read or understood by any resident. And, frankly Mooncrest Lane residents wonder if have a our working-class neighborhood lacks the clout to have weight given to our concerns.

With that said, I will provide comments hoping that they will be considered and given at least the same review that I have given this EIR.

#### CITY ANNEXATION

Contrary to the EIR's misleading wording, this property is virtually an island surrounded by the County to the north, east, south and separated by the City on the west by Highway 135 (Figure 2-1. Project vicinity map). The EIR's statement appears to be an attempt to justify LAFCO's approval by saying in 4.9-41 that this county property is "bordered by City of Santa Maria City limits to the north". City is a distance away to the north. This proposal does NOT "eliminate islands, corridors," only language manipulation does.

#### GAS STATION/DRIVE-THROUGHS .

##### .. CLIMATE CRISIS?

I am unequivocally opposed to adding a gas station and fast food drive-throughs (multiple) units.

This project and the city/county governments have an opportunity here to look to the future of our climate and REDUCE GHG emissions rather than justify increasing them.

SBr 1-1

SBr 1-2

SBr 1-3



These outdated design plans promote driving of cars--increased number of cars with density, increased driving trips, increased use of gas on 43 acres where there previously was none.

A gas station was recently approved at intersection of Lakeview/135 (county at 3616 Orcutt Road, closely north of this proposed project). And two gas stations already exist at Bradley/Clark intersection (Oak Knolls). All within approximately 2 miles. We need more at this location?

Rice Ranch Development of over 700 units, and more if counting adjacent developments, appears to be able to exist without needing an additional gas station or drive-throughs in their neighborhood.

This EIR states the City of Santa Maria has not adopted a climate action plan nor other GHG reduction plan. Having no plan does not justify finding a way to add these uses.

Page 41 of Volume II, AMBIENT's assessment relative to ARB California's 2017 Climate Change Scoping Plan states: "However, the proposed project does not include BMPs that would constitute its 'fair share' of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045. As a result, this impact would be considered **potentially significant**."

Did I misunderstand when Volume I then used BAAQMD's thresholds to mitigate the prior paragraph's concerns with "promote alternative uses of transportation" (one crossing improvement and bike racks?) and "installation of EV-ready parking spaces"(are those on the plans?).

Using engineering data to justify a gas station and multiple drive-throughs authorizes VMTs which directly and unnecessarily add to GHG emissions and pollutants.

*This project will not reduce emissions and will only exacerbate climate change!*

#### COMPATIBILITY WITH SURROUNDING COMMUNITY

##### **Traffic and Parking**

Mooncrest Lane, immediately adjacent to and south of this project, is not mentioned or addressed for traffic issues. Even without an engineering degree, I can guarantee that this street will be used to cross to and from Orcutt Road and Hummel Drive as it currently is, but with many more trips.

Plans offer no clarity to how Dancer Avenue will be used. A stop sign was recently installed approximately 30 feet from the end of Dancer (field boundary) where it intersects Mooncrest Lane (screenshot below). Whyever would that be installed if there were to be no traffic?

We have begun to see increased overflow parking at the Hummel Drive housing.

This project as presented would increase traffic congestion, traffic-related noise, and burden parking for the neighborhood to the south.

##### **Construction impacting the southern border residents' property**

This EIR includes site-specific soil/engineering data and mitigates all construction issues on that site.

What I did not see addressed was possible negative impacts on property immediately adjacent to and south of the parcel. These properties sit at differing elevations from the parcel to be developed. And, some have mature trees.

SBBr 1-3  
(cont'd)

SBBr 1-4

SBBr 1-5

Considering the recent erosion, sinkhole, and flooding issues in the Orcutt area, can the City and this developer assure these residents that their property will not suffer negative impacts or damage during construction and, more importantly, after completion?

↑ SBr 1-5  
(cont'd)

***Walk, jog, walk dogs***

This project does not minimize the impact or respect the surrounding existing neighborhood, particularly Mooncrest Lane and other homes to the south. We walk, jog, walk our dogs, and talk to our neighbors. This project offers no trails, walking paths, or preserved areas. It could have proposed greener plans with community gardens, walkways and paths throughout housing and to restaurants and shops. Instead, the plans show roads and parking lots.

↓ SBr 1-6

"Proposed pedestrian facilities" is actually one identified "crossing improvement" (Figure 4b). How does that serve as mitigation?

Bike racks are accepted as mitigation for increased VMTs? (As an aside, I find that and the crossing improvement insulting.)

**AESTHETICS (4.1)**

Two views that give balance to the visual impact of the eucalyptus stand were not presented in this EIR. The first, taken January 1, 2023, is from Orcutt Road facing northeast (screenshot included below). No photo was presented in this EIR from the south looking north to eucalyptus stand and I've included one I took from my back yard on the same day (screenshot included below). *I've included these to give weight to the visual value of this windrow of mature eucalyptus trees that should be preserved.*

↓ SBr 1-7

For added perspective from our neighborhood, no reference was made to the great horned owl. The great horned owl roosts in pine and eucalyptus trees on the south of this lot and many times over the years I've seen and heard it.

It is quite likely that the red-tailed hawks I see almost daily nest in the eucalyptus stand. It is as if one were describing city pigeons rather than red-tailed hawks here: "Thus, the project site provides minimal quality habitat for locally common wildlife species ..." (4.3.1.3 Habitat Suitability for Wildlife)

↓ SBr 1-8

I have heard and my neighbors have seen bats many times in the night over the years.

The explanation that it is okay to remove monarch habitat because so few have been counted and there are many more in Pismo, confuses me.

I make these statements with hope for a more balanced consideration to adding housing while respecting the environment.

**NOISE, POLLUTION, and SAFETY**

The "long-term" noise monitoring in this EIR is defined as 24 hours in one day of April. One day of measurements does not adequately represent noise issues. And, it is further misleading and inaccurate to state: "To a lesser extent, birds and the occasional airplane overflight also contribute to the ambient noise environment." (section under ambient noise 4.10.1.2 Local Setting)

↓ SBr 1-9

Screenshot of a complaint I filed with the FAA and airport district is below. This documents more than an "occasional airplane" in one single day.

***Military training jets***

No reference or measurements are made for the last 6 months of 2022 for the noise and air pollution generated by military training jets.

SBCAG's Santa Maria ALUCP (draft) and their CNEL contours and charts in this EIR do not reference flights of military planes. The airport is *soliciting and promoting increased military use*, particularly jet-pilot training, through Central Coast Jet Center.

Military sound-barrier-breaking jets generate noise and vibrations on take off, approach, and landing. And, safety is a concern when these training jets (F-5, T-38, F-18, Osprey, etc.) fly extremely low making sloping passes over Mooncrest Lane and this project's parcel.

There are 4 flight approach paths to the Santa Maria Airport. Two of those approach paths have steep slopes (50:1 the steepest). The military uses these two approaches (as referenced in previous paragraph) for their cargo and jet-pilot training. They fly multiple low, noisy, and often frightening passes.

*The proposed housing units will be built directly under these approach paths.*

*Residents will be living in a noisy, polluted, and most importantly unsafe environment **IF** these military flights continue.*

This FAA site ([https://www.faa.gov/regulations\\_policies/policy\\_guidance/noise/community](https://www.faa.gov/regulations_policies/policy_guidance/noise/community)) lists factors that determine airport noise experienced on ground including: model aircraft and type of engine; are the aircraft taking off or landing; what is the flight path of flights going overhead; how quickly does the plane ascend or descend; and, is the plane operating at full or partial power. When dealing with military aircraft, particularly sound-barrier-breaking training jets in a small regional airport, aggregate CNEL is a not sufficient. *Specific jets and their specific decibels (db) need to be counted.*

As part of conditions of approval for this project I recommend:

- 1) this site be monitored by an impartial, scientific organization for a minimum of 6 months from June through November, unless the Santa Maria Airport District can identify a more intense specific schedule for military aircraft use. All data must be available and accessible to the public.
- 2) a permanent station be installed in the southeast vicinity of this project. The noise levels to be monitored for military aircraft and their specifically associated decibel level. All data must be available and accessible to the public.
- 3) all CCRs, deeds, and legal paperwork new owners/residents receive specifically identify the military noise/safety conditions presented here.

This EIR's review and scope is remiss for not acknowledging and addressing the existence and increase of military training jets using this small regional airport.

**I support the development of affordable housing. All housing, "affordable" or high-end, should be designed to enhance the environment, residents, and neighboring communities.**

Sites can be developed with respect for residents and their environment. The statement here is a small example: "These mature windrows of eucalyptus trees have been preserved as part of the Orcutt Community Plan to provide the potential habitat for nesting and roosting for a variety of birds including raptors (such as red tailed hawks); as well as providing a major visual resource for the area."

**Unfortunately, this project appears to EXPLOIT more than enhance.**

Sincerely,  
Susan Bryant  
307 Mooncrest Lane

SB 1-9  
(cont'd)

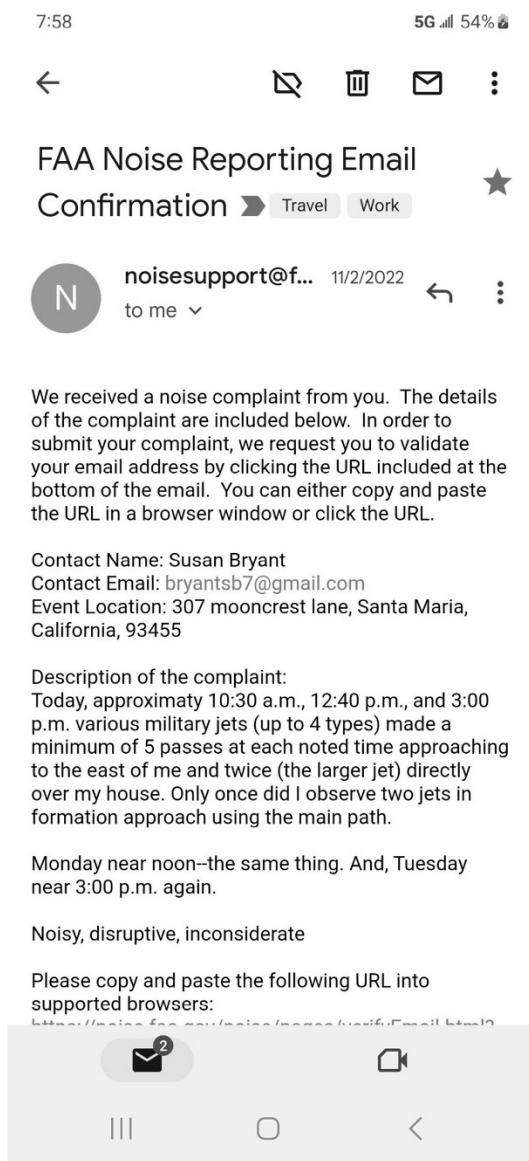
SB 1-10



SBr 1-10  
(cont'd)



SB 1-10  
(cont'd)



SBr 1-10  
(cont'd)



From: susan bryant <bryantsb7@gmail.com>  
Date: Sat, Jan 28, 2023, 12:41 PM  
Subject: Richards Ranch draft EIR additional comment  
To: Dana Eady <deady@cityofsantamaria.org>  
Cc: <ken@sbcn.org>, Nadia Abushanab <nadiasbcn@gmail.com>, <jeanne@sbcn.org>, Citizens Planning Association <citizensplanningsb@gmail.com>

An additional comment for draft EIR

Regarding **Aesthetics (4.1)**. In my original comments I questioned removal of eucalyptus trees and the rationale that it is okay to remove monarch habitat because so few have been counted and there are many more in Pismo.

Further acknowledgment for my concern can be found in the January 24 press release (screen shot below) and a January 28, 2023, SLO Tribune article: "Monarch Butterfly Conservation Gets \$10 Million as SLO County population Rebounds."

Carbajal stated he is "pleased we were able to secure this important increase in federal resources **for preserving and growing the monarch populations in our region and across the western United States**". [My emphasis added.]

As Panetta stated: "The decline of monarch butterfly populations poses a serious threat to our environment, farmers, food supply and the **very character of our communities in California**." [My emphasis added.]

Panetta went on to say: "This funding for the newly created Monarch and Pollinator Highway Program is critical to **empowering state and local governments to restore the habitats of these essential pollinators**. For generations, many Californians, including me and my family, have had the privilege of experiencing the migration of the western monarch butterfly, and providing the funding for more habitats is the least that we can do to ensure survival of this amazing species."

**Evidently our state representatives are not giving short shrift to the monarch butterfly and our community as the Richards Ranch developer and the City appear to be.**

Susan Bryant

SB 2-1



SB 2-1  
(cont'd)



### 1.4.3.1 Response to Letter from Susan Bryant

Comment No.	Response
SBr 1-1	The comment is an introduction to the comment letter. Refer to MR-5, which responds to non-substantive comments.
SBr 1-2	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p>
SBr 1-3	<p>The comment raises concern related to GHG emissions and the increase in GHG emissions that the project would add and opines regarding the appropriateness of the land uses (e.g., gas stations and fast-food drive throughs) included in the proposed project.</p> <p>There is no disputing that the project would add GHG emissions to the environment. The question that the EIR must address is whether the contribution of GHG is determined to be significant. Project-generated emissions were evaluated in accordance with SBCAPCD recommended methodologies and significance thresholds. Mitigation measures have been included to reduce project-generated emissions, including emissions of GHGs, associated with short-term construction and long-term operation of the project. In addition, the proposed gasoline-dispensing station would be subject to the SBCAPCD permitting requirements for stationary emission sources.</p> <p>Analysis of the project was conducted based on consistency with applicable GHG-reduction plans in order to evaluate the project's consistency with the State's future GHG-reduction goals. These plans include the SBCAG 2050 Regional Transportation Plan and Sustainable Communities Strategies (2050 RTP/SCS) and the CARB Climate Change Scoping Plan. As noted in the analysis, the City of Santa Maria does not have an adopted GHG reduction or Climate Action Plan.</p> <p>Project design combined with Mitigation Measures EN/mm-1.1, GHG/mm-2.1, and GHG/mm-2.2 enable consistency with applicable plans and ensure the project would be contributing its fair share toward achieving the State's goal of carbon neutrality by 2045. No changes to the EIR were found to be necessary to address this comment as the points made by the commenter do not provide new information or evidence that would result in a change the EIR analysis.</p> <p>Refer also to MR-9, which responds to comments related to air quality and GHG emissions. In addition, in response to the commenter's concerns regarding the appropriateness of the land uses proposed, the concerns raised could be relevant for consideration by the City's decision-making bodies in their consideration as to whether to approve or deny approval of the project. As such, they have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
SBr 1-4	<p>The comment raises concern related to traffic congestion, traffic-related noise, and parking.</p> <p>Refer to MR-3, which responds to comments related to transportation and MR-12, which responds to comments related to noise.</p> <p>Specific questions are raised about how Dancer Avenue would be used with implementation of the project. As noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
SBr 1-5	<p>The comment raises concern related to construction impacts to surrounding properties. Specifically, the commenter indicates that impacts on property immediately adjacent to and south of the Richards Ranch parcel should be addressed, including the potential for erosion, soil stability, and flooding issues.</p> <p>As discussed in Section 4.6, Geology and Soils, all future development within the project site would be subject to the CBC, which requires buildings, building foundations, and any other associated structures to be constructed to withstand earthquake loads, including liquefaction. Future buildout of the project would also be required to comply with the building and design measures included in the <i>Geotechnical Engineering Report</i> and associated reports prepared by Earth Systems Pacific for the project, as detailed in Mitigation Measures GEO/mm-2.1, GEO/mm-2.2, GEO/mm-2.3, GEO/mm-3.1, GEO/mm-3.2, GEO/mm-3.3, GEO/mm-5.1, and GEO/mm-6.1. Mitigation Measure GEO/mm-6.1 has been identified to require the developer to retain a qualified Geotechnical Engineer to provide consultation during the design phase, to aid in future project design consistent with the Geotechnical Engineering Report, to review final plans once they are</p>

Comment No.	Response
	<p>available, to interpret this report during construction, and to provide construction monitoring in the form of testing and observation. In addition, future buildout of the project would be required to comply with all applicable CBC standards, including Section 1613 of the CBC to reduce or avoid risk associated with development on potentially unstable soils, including liquefaction. The project would also be required to implement Mitigation Measure GEO/mm-2.3, which requires measures for building foundations to be implemented into future project design criteria to reduce the risk of collapse or other damage due to unstable geologic conditions.</p> <p>As described in Section 4.8, Hydrology and Water Quality, as part of the permitting and approval of development on the site after annexation to the City, the developer would be required to develop and implement a SWPPP in accordance with the Construction General Permit. The SWPPP would include a grading plan, a drainage plan, an erosion and sedimentation control plan, pollutant sources, BMP identification, and post-construction stormwater management. The SWPPP would include a description of potential sources of pollutants, including pollutants originating from offsite, which may flow across or through areas of construction. The SWPPP would specify the location, type, and maintenance requirements for BMPs necessary to prevent stormwater runoff from carrying construction-related pollutants into nearby receiving waters (in this case, Santa Maria River). BMPs must be implemented to address the potential release of fuels, oil, and/or lubricants from construction vehicles and equipment (e.g., drip pans, secondary containment, washing stations); release of sediment from material stockpiles and other construction-related excavations (e.g., sediment barriers, soil binders); and other construction-related activities with the potential to adversely affect water quality. The number, type, location, and maintenance requirements of BMPs to be implemented as part of the SWPPP depend on site-specific risk factors, such as soil erosivity factors, construction season/duration, and receiving water sensitivity.</p> <p>An Erosion and Sedimentation Control Plan would be included with the SWPPP. The Erosion and Sediment Control Plan would include a description of the BMPs to reduce the tracking of sediment onto public or private roads at all times. The Erosion and Sediment Control Plan would also contain erosion and sediment controls, soil stabilization, dewatering, source controls, and pollution prevention measures per the California Stormwater Quality Association's (2003) <i>Stormwater Best Management Practice Handbook</i> and must describe the rationale used to select BMPs.</p> <p>Compliance with the requirements of the Central Coast RWQCB requirements (CWA NPDES Program and Porter-Cologne Act waste discharge requirements), Construction General Permit, and City stormwater regulations are sufficient to address the potential for buildout of the project to violate water quality standards or waste discharge requirements. These requirements have been included in Mitigation Measures HYD/mm-1.1 and HYD/mm-1.2 to ensure proper timing and that the requirements be included on construction plans. With adequate implementation and maintenance of SWPPPs, erosion and stormwater control plans, and drainage plans that would be required for any future development within the project site, the proposed project would not substantially alter the drainage pattern beyond the construction footprint and would not alter offsite drainage patterns. In addition, Mitigation Measure GEO/mm-5.1 has been identified to stabilize surface soils during and following grading and construction activities.</p> <p>With required adherence to the CBC and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with unstable geologic conditions or off-site flooding. Revisions to the EIR are not necessary in response to The comment.</p>
SBr 1-6	<p>The comment raises concern related to recreational trails. The comment specifically states that the project offers no trails, walking paths, or preserved areas.</p> <p>Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. Given the current property is private land, unauthorized use of the current property for recreational activities is not considered a sanctioned or frequent use, and thus is not considered in the EIR.</p> <p>The comment also questions whether it is appropriate to consider bike racks are accepted as mitigation for increased VMT. While it is appropriate to require this type of mitigation for reduction of vehicle trips, the EIR does not specify a mitigation measure like this to reduce VMT. However, the EIR does include GHG/mm-2.1, which includes a variety of design features to encourage the use of alternate transportation modes and reduce mobile-source emissions; this measure specifies several specific requirements to improve and increase bicycle usage. These measures would help to ensure the project would be consistent with plans and policies adopted for the purpose of reducing the emissions of greenhouse gases, including the 2050 RTP/SCS and CARB's 2017 Climate Change Scoping Plan.</p> <p>Refer also to MR-7, which responds to comments related to recreation.</p>
SBr 1-7	<p>The comment raises concern related to visual impacts. Refer to MR-10, which responds to comments related to visual resources.</p>

Comment No.	Response
SBr 1-8	The comment raises concern related to animals that use the project site. Refer to MR-11, which responds to comments related to biological resources, including the species noted by the commenter as being potentially present at the project site.
SBr 1-9	<p>The comment raises concern related to noise and other hazards associated with Santa Maria Airport. Regarding noise related to the airport, the compatibility of proposed land uses with aircraft noise were assessed based on the most current noise contours available for the Santa Maria Airport (Santa Barbara County Association of Governments, 2017). The airport noise contours were developed considering a multitude of factors, including (but not limited to) the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant. It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports. Refer also to MR-12, which responds to comments related to noise, including aircraft-related noise.</p> <p>Regarding hazards associated with the Santa Maria Airport, Refer to MR-4, which responds to comments related to airport hazards.</p>
SBr 1-10	<p>The comment is a conclusion to the comment letter. Specifically, the commenter indicates that they support the development of affordable housing, but that all housing should be designed to enhance the environment, residents, and neighboring communities.</p> <p>This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body. Refer also to MR-5.</p>
SBr 2-1	<p>The comment raises concern related to monarch butterfly and loss of its habitat. Specifically, the commenter raises concern regarding the proposed removal of the eucalyptus trees at the project site, supplementing the commenter's previous comments regarding the eucalyptus trees (Comment SBr 1-7). The commenter references a newspaper article regarding funding that has been devoted to monarch butterfly conservation and requests that the City address the monarch conservation more thoroughly.</p> <p>Refer to MR-11, which responds to comments related to biological resources, including those related to the monarch butterfly.</p>

## 1.4.4 Cynthia Melendez

January 16, 2023

To whom it may concern,

I have lived in Orcutt for about 9 years. We bought a home on Mooncrest Lane, directly behind the proposed Richard Ranch project.

In the 9 years that we have lived in Orcutt we have enjoyed amazing weather, wide open spaces, low traffic and a friendly community.

I am writing to oppose the annexation of the proposed site for Richard Ranch. Some of my concerns about this proposal is the influx of traffic in the area. Union Valley parkway has been a pretty busy thoroughfare since I've lived here. The road opened shortly after we bought our home. Since then there has been many traffic accidents(many more than listed in the EIR), due to the speed allowed on the road and the proximity of the stoplights at Orcutt Road and Orcutt Expressway. The noise from sirens can be heard almost nightly. Some of those accidents have been devastating. I think adding more cars on that road will exacerbate the problem.

As I read through the report, noise pollution was briefly touched on. No mention at all of the air traffic. We are directly in the flight path for Santa Maria Municipal Airport. Our small airport is host to Allegiant Air, they do several trips to Las Vegas weekly. During fire seasons, it is typical to see the fire rescue planes, the DC-10 tanker is a massive plane along with the smaller fleet and the air traffic is constant. Throughout the year, we have many military air craft trainings, from large air craft to jets and helicopters. When the military jets fly over our home it is extremely low, very loud and the jet fumes are strong. There was no mention of sound pollution from the jets in the environmental impact report. When a jet breaks the sound barrier over our home it can be very loud and the entire house rumbles. I think it's important to mention. We enjoy the jets immensely and would hate for them to loose their fly zone. Being in the direct flight path, we were always lead to believe that the area was a strict no build zone, there are new apartments built on Bradley Road with large open spaces where the contractors were not allowed to build because of the fly zone. Will the air traffic be redirected if the proposed project is approved?

As a street that is directly behind the proposed annex, I am very concerned about local street parking. Because of the housing shortage in California and the high cost of living, single family homes have become a thing of the past. In some instances up to 3 families can inhabit a single home. Most Californians own more than one home, if we say most have 3 cars per family, that is anywhere between 1500-4000 cars that will reside in the proposed 400 apartments and 95 townhomes. Most apartments give residents 1 to 2 parking spaces at the most. I fear that all the excess cars will be parked on Mooncrest.

Mooncrest as of late has been surrounded by care homes for several types of groups, most have multiple workers. It is rare that there is parking anywhere in front of my house for my guests due to workers parking. We also have contact law enforcement activity and their traffic takes up our street as well. I cannot imagine adding more cars on this street.

One of my favorite features of our neighborhood is listening to wildlife outside. In the summer we are greeted by owls, bats, California King snakes and hawks. Monarchs do reside in the Eucalyptus trees in the open field. All of these creatures will be displaced due to construction and it will be a detriment to our neighborhood as these animals help mitigate pests.

Lastly, as California becomes more crowded we are consuming more and more natural resources. Our Governor's office constantly warns of rolling blackouts, droughts and climate

CM-1

CM-2

CM-3

change. Our natural gas prices have almost doubled as of late, as well as our electric, garbage and sewage bills. Adding more people to our small community will only increase costs and deplete our natural resources. How can we continue to add housing if our state cannot provide the energy for? The plan would like to add a gas station. How will this help us get fossil fuels off the roads by 2040?

Looking over the plans I've noticed that there is no school. Where will the children attend schools? Orcutt Union School District is already maxed out. Will they be bussed to Santa Maria? If so, we are now adding buses to and fro on UVP.

My children have long enjoyed playing in the open spaces behind Mooncrest. It is a great place to walk pets and enjoy nature. It would be sad to lose this small piece of open space.

I urge the city to strongly reconsider annexing this property. The development of this particular area would be a mistake. I am sure that there are other locations in our area better suited for a development of this size.

Cynthia Melendez, Orcutt resident, Mooncrest Ln.

↑  
CM-3  
(cont'd)  
|  
CM-4  
|  
CM-5  
|  
CM-6

### 1.4.4.1 Response to Letter from Cynthia Melendez

Comment No.	Response
CM-1	<p>The comment raises concern related to traffic congestion and safety, parking, noise, and Santa Maria Airport. Specifically, the commenter provides an expanded discussion of current operations at the Santa Maria Airport and the various aircraft activities that may occur from the airport.</p> <p>Refer to MR-12, which responds to comments related to noise and MR-4, which responds to comments related to airport hazards. The EIR noise analysis took the existing noise conditions in and around the project site into consideration. Specifically, noise measurements were taken to characterize the existing noise environment, including airport noise caused by the operations described in the comment. This project would not result in any redirection of air traffic. Based on the analysis conducted, the project would be consistent with the noise compatibility criteria included in the 2022 ALUCP.</p> <p>Refer also to MR-3, which responds to comments related to the transportation system. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
CM-2	<p>The comment raises concern related to animals that use the project site. Refer to MR-11, which responds to comments related to biological resources.</p>
CM-3	<p>The comment raises concern related to energy use and associated costs of energy.</p> <p>Refer to MR-14, which responds to comments related to other utilities, including electricity and natural gas. The proposed project would be required to include numerous measures to help reduce energy use and climate change impacts, including measures to promote the installation of solar photovoltaic systems and prohibiting the installation of natural gas to service proposed residential development.</p>
CM-4	<p>The comment raises concern related to the provision of school facilities and resources. Refer to MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
CM-5	<p>The comment indicates that the project site has been used by children and enjoyed as an open space.</p> <p>The project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
CM-6	<p>The comment is a conclusion to the letter which does not identify any specific concerns with the EIR.</p> <p>Refer to MR-5, which responds to non-substantive comments. These comments have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>



## 1.4.5 Mary Ellen Peters

From: [casunshin@verizon.net](mailto:casunshin@verizon.net) <[casunshin@verizon.net](mailto:casunshin@verizon.net)>

Sent: Wednesday, January 18, 2023 5:11 PM

To: Dana Eady <[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)>

Subject: Site 26 Development /Annexation

I was in attendance at your community meeting 1/17/23.

As an Orcutt resident for 39 years, I am very disappointed in the proposed annexation and development.

It's obvious the developers have ulterior motives in asking the city to annex those 43+ acres. I heard at your Element Housing meeting that some parts of the usual approval process can be bypassed when building high density housing because of state pressure for more housing. I'm guessing the developer wants it annexed to expedite the process.

It's unfortunate that he attended the meeting with his binder in hand, yet refused to answer ANY of our questions on the record. Talk about a lack of transparency!

1. I agree with the person who complained about the timing of the meeting... many of the residents who would be impacted were unable to attend a meeting at 3:30pm. Whether it's required or not, you need to offer another input meeting for everyone who wants to attend after 5pm.

2. I live in the "doughnut hole" area of Orcutt off Lakeview. that currently has no close fire station. The closest one to us serves Santa Maria, not Orcutt. The other 2 are in south Orcutt, not close enough for quick response. I learned at a Bd of Supv meeting that a new station is coming to UVP area. So the airport fire station can respond to Site 26, but not to us- 1 mile away. And the planned new fire station off UVP can't respond to Site 26, a half mile away.

3. Then there's needed police services for Site 26. Who will respond? Will Santa Maria PD drive into Orcutt? There is a significant increase in residential crime in recent years in Orcutt, and a shortage of Sheriffs to patrol it. Who will patrol the Site 26? Highway patrol? I doubt they can respond. The one time my security alarm went off, it took Sheriffs 20 minutes to respond. If there had been an intruder, I likely would've been dead.

4. If Site 26 is annexed, you will have "cut up" the county, like a jigsaw puzzle. Is your long term goal to keep annexing all new Orcutt developments for the city to benefit from the sales tax and property taxes? Will my area also be swallowed up in the future?? The boundary has moved closer and closer to us in the 4 decades we've lived here.

4. 497 new high density housing units will come with hundreds of school aged children. The Orcutt schools are already overcrowded, as clearly visible by the sheer number of "portable" classrooms at the schools. You will need to build a new elementary school, and then do you plan to squeeze the current Jr High and High Schools in Orcutt? Or will the children attend Santa Maria schools, since it'll be part of Santa Maria?

5. Parking will be inadequate. You can't assume only 2 cars per unit. Will the units have 2 car garages? Look at the fiasco around Montivao condos. They park their cars across Bradley, in front of single family homes, and the owners can't park in front of their own houses.

6. Traffic flow is already dangerous at 135 & UVP. Drivers daily doing 70 mph on 135 prefer not to stop for a red light. There have been dozens of accidents, and multiple fatalities. Adding a signal at Hummel won't reduce how dangerous the 135/ UVP intersection is.

It took me over a half hour to get from Lakeview Td to the meeting yesterday. That's because at 3 pm, I can't turn west on Lakeview. You already have Lakeview Jr High, Nightengale, Pacific Christian, Alice

MEP-1

MEP-2

MEP-3

MEP-4

MEP-5



Shaw, Righetti, and St Joes schools parents and students in that neighborhood, picking up kids, and going home.

If you add another school to that area, it'll be exponentially worse.

7. "GS Water will provide water to Site 26 " residents of Santa Maria. WHY? If I've had to cut back my gardens, grow no grass, and buy plants that can survive on a bit of water only 2x/week, why on earth should GSW provide it to a parcel with 497 homes and many businesses belonging to Santa Maria?

Certainly not in the best interest of the Orcutt community.

8. Better idea for Site 26:

Orcutt desperately needs more trails/ parks- Rice Ranch has added many new homes, and dessimated the trails we used to have.

Orcutt needs an indoor aquatic recreational center, for all of its' residents to enjoy. Swimming lessons, aquatic exercise programs, swim team practice pool, and recreational swimming would benefit Orcutt residents of all ages. One was planned for our community many years ago, but was never built.

Thank you.

Mary Ellen Peters

[Sent from the all new AOL app for iOS](#)

↑ MEP-5  
(cont'd)

MEP-6

MEP-7

### 1.4.5.1 Response to Letter from Mary Ellen Peters

Comment No.	Response
MEP-1	The comment is an introduction to the letter. Refer to MR-5, which responds to non-substantive comments.
MEP-2	The comment raises concern related to the provision of police and fire protection services. Refer to MR-1, which responds to comments related to emergency services.
MEP-3	The comment raises concern related to the proposed annexation of the project site. Refer to MR-8, which responds to comments related to annexation.
MEP-4	The comment raises concern related to the provision of public school services. Refer to MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.
MEP-5	<p>The comment raises concern related to traffic safety and parking.</p> <p>Refer to MR-3, which responds to comments related to the transportation system. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
MEP-6	The comment raises concern related to water supply. Refer to MR-6, which responds to comments related to water supply.
MEP-7	<p>The comment raises concern related to the provision of recreational facilities and trails.</p> <p>Refer to MR-7, which responds to comments related to parks and recreation.</p> <p>Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate <u>existing</u> recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.6 Lynn Alvarez

**From:** Lynn  
**To:** Dana Eady  
**Subject:** Plans  
**Date:** Thursday, January 19, 2023 9:26:57 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Lynn Alvarez

Sent from my iPhone

I LAI-1  
I LAI-2  
I LAI-3

### 1.4.6.1 Response to Letter from Lynn Alvarez

Comment No.	Response
LAI-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
LAI-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
LAI-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.7 Alyssa Boger

**From:** [Alyssa Boger](#)  
**To:** [Dana Eady](#)  
**Subject:** Against annex of 44 acres in Orcutt  
**Date:** Thursday, January 19, 2023 9:07:45 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike.

I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you from a newer resident to the beautiful Orcutt area,  
Alyssa Boger  
650 Dale way

ABo-1

ABo-2

ABo-3

### 1.4.7.1 Response to Letter from Alyssa Boger

Comment No.	Response
ABo-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ABo-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ABo-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.8 Stephanie Burks

**From:** [Stephanie Burks](#)  
**To:** [Dana Eady](#)  
**Subject:** To whom it may concern  
**Date:** Thursday, January 19, 2023 9:17:57 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am extremely opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. I have seen many accidents over the past few years at this very intersection. We live in Foxenwood and hear sirens non stop as it is. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Stephanie Burks

SBu-1

ISBu-2  
ISBu-3

### 1.4.8.1 Response to Letter from Stephanie Burks

Comment No.	Response
SBu-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic congestion and safety, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to the transportation system. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Refer also to MR-12, which responds to comments related to noise and MR-13, which responds to comments related to pollution.</p>
SBu-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
SBu-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.9 Jermaine Castillo

**From:** [Jermaine Castillo](#)  
**To:** [Dana Eady](#)  
**Subject:** Opposition to City of Santa Maria annexation proposal of 44 acre parcel near UVP and HWY135  
**Date:** Thursday, January 19, 2023 11:33:22 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Sir/Ma'am

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions.

Regarding schooling issues, where will the hundreds of children from 497 new households attend school? Existing OUSD schools are already overcrowded, with numerous portable classrooms in use. Traffic in that area is jammed each morning and afternoon with students being dropped off and picked up. Will an additional elementary school be built? Can OJHS and RHS assimilate hundreds more?

Please do not move forward with plans to annex this land and stop all plans for development.

Thank you

V/r,  
Jermaine Castillo

JC-1

JC-2

JC-3

IJC-4

### 1.4.9.1 Response to Letter from Jermaine Castillo

Comment No.	Response
JC-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JC-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JC-3	<p>The comment raises concern related to the provision of public school services and associated traffic. Refer to MR-2, which responds to comments related to public school services, and MR-3 which addresses comments related to traffic and transportation.</p>
JC-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.10 Ismael and Linda Castillo

**From:** [linda.castillo](#)  
**To:** [Dana Eady](#)  
**Subject:** Opposed to 135 and UVP Annexation Project!  
**Date:** Thursday, January 19, 2023 9:11:42 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

We are whole-heartedly opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135 for development of almost 500 living units and 100,000 sq feet commercial space. Our Orcutt roads are already congested thoroughfares with dangerous intersections in that vicinity. The added traffic, noise, people and pollution will lower the quality of life and property value that we all pay for and enjoy in Orcutt. It would create overcrowding and busier road conditions for drivers, cyclists, local schools and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on severe water restrictions. Please do not move forward with plans to annex this land and instead cease and abandon any plans for development at this location immediately.

This proposed project is completely unacceptable for our small community and we oppose the city's attempt to take this land to itself and to serve the City's own purpose and ignore the best interests of the community of Orcutt. We do not want this project in our neighborhood nor do we want this vast number of new residents, vehicles, shoppers etc that it would bring to our small town.

Thank you,

Ismael and Linda Castillo  
Foxenwood Estates Homeowner - Orcutt

ILC-1

ILC-2

ILC-3

### 1.4.10.1 Response to Letter from Ismael and Linda Castillo

Comment No.	Response
ILC-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ILC-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ILC-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.11 Debra Coker

**From:** Debra Coker <letsqabb74@gmail.com>  
**Sent:** Thursday, January 19, 2023 10:50 AM  
**To:** Dana Eady <deady@cityofsantamaria.org>  
**Subject:** Adding more apartments in Orcutt

Good morning, I was unable to attend the meeting due to my job, I would like to address this with my opinion. I love Orcutt and its small tight community, I love how everyone helps each other and is a positive and safe place for our children.

What is the point of all this growth? What do we expect to get out of all this expansion? Where is the water coming from to support more people and more housing? Orcutt is already having water shortages. We as a community are paying the price for the City's choice to grow. The traffic is horrible already and so many accidents, how do you plan on adding more people and yet making it safer? UVP is a nightmare as it is, planning was already horrible with this addition several years ago, as you can tell the flooding on UVP into that neighborhood should have not happened, poor planning and rushed plans are a problem.

I am not in support of the area growing in this way, PLEASE do not approve this plan as it will change our community for the worse.

**Debra Coker**

*Learn from yesterday, live for today, Hope for tomorrow!*

DC-1  
DC-2  
DC-3

### 1.4.11.1 Response to Letter from Debra Coker

Comment No.	Response
DC-1	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
DC-2	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
DC-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.12 Leslie Griego

**From:** [Leslie Griego](#)  
**To:** [Dana Eady](#)  
**Subject:** Union valley parkway/Santa maria  
**Date:** Thursday, January 19, 2023 9:45:53 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Leslie

Get [Outlook for iOS](#)

LG-1

LG-2

### 1.4.12.1 Response to Letter from Leslie Griego

Comment No.	Response
LG-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
LG-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
LG-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.13 Jillian Hankins

**From:** [Jillian Hankins](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP & HWY 135  
**Date:** Thursday, January 19, 2023 11:28:01 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

JH-1

JH-2

JH-3

### 1.4.13.1 Response to Letter from Jillian Hankins

Comment No.	Response
JH-1	<p>The comment states that the commenter is opposed to the project because of concerns related to traffic congestion and safety, noise, and pollution.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Refer also to MR-12, which responds to comments related to noise and MR-13, which responds to comments related to pollution.</p>
JH-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JH-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.14 Tiffany Hopkins

**From:** [Tiffany](#)  
**To:** [Dana Eady](#)  
**Subject:** Union Valley Parkway annexation  
**Date:** Thursday, January 19, 2023 10:02:11 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections, as can be evidenced by the almost daily accidents in this area. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Tiffany Hopkins

Sent from my iPhone

TH-1  
ITH-2  
ITH-3

### 1.4.14.1 Response to Letter from Tiffany Hopkins

Comment No.	Response
TH-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic congestion and safety, noise, and pollution.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Refer also to MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution.</p>
TH-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
TH-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.15 Mary Housel

**From:** [Mary Housel](#)  
**To:** [Dana Eady](#)  
**Subject:** Orcutt development  
**Date:** Thursday, January 19, 2023 10:31:40 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Dana,

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Mary Housel  
Orcutt resident

MHo-1

MHo-2

MHo-3

### 1.4.15.1 Response to Letter from Mary Housel

Comment No.	Response
MHo-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
MHo-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
MHo-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.16 Edward and Catriena Lyons

**From:** [edward.lyons](#)  
**To:** [Dana Eady](#)  
**Subject:** Union Valley Parkway/Highway 135  
**Date:** Thursday, January 19, 2023 11:09:23 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

ECL 1-1

ECL 1-2

Additional points of concern.

Where are the children going to school? It is Santa Maria annexed land and they are situated in Orcutt school district.

ECL 1-3

Police and fire resources?

ECL 1-4

Santa Maria only wants the tax revenue stream from the retail sales

ECL 1-5

Why is Orcutt getting 100% of the required housing growth for North County?

ECL 1-6

Edward & Catriena Lyons  
Concerned Orcutt Residents

Sent from Yahoo Mail for iPhone

**From:** [edward.lyons](#)  
**To:** [Dana Eady](#)  
**Subject:** Union Valley and Highway 135  
**Date:** Wednesday, January 25, 2023 1:57:10 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Additional points of concern.

Where are the children going to school? It is Santa Maria annexed land and they are situated in Orcutt school district.

Police and fire resources?

Santa Maria only wants the tax revenue stream from the retail sales

Why is Orcutt getting 100% of the required housing growth for North County?

Edward & Catriena Lyons  
Concerned Orcutt Residents

Sent from Yahoo Mail for iPhone

ECL 2-1



### 1.4.16.1 Response to Letters from Edward and Catriena Lyons

Comment No.	Response
ECL 1-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ECL 1-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ECL1 -3	<p>The comment raises concern related to the provision of public school services. Refer to MR-2, which responds to comments related to public school services. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
ECL1 -4	<p>The comment raises concern related to police and fire protection services. Refer to MR-1, which responds to comments related to emergency services.</p>
ECL 1-5	<p>The comment raises concern related to taxes. Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
ECL 1-6	<p>The comment raises concern related to population growth. Refer to MR-15, which responds to comments related to population growth and other public services.</p>
ECL 2-1	<p>This is a duplicate letter. See the responses to the letter dated January 19, 2023, above.</p>

## 1.4.17 Anastacia Malm

From: AMalm <amalm712@gmail.com>  
Sent: Thursday, January 19, 2023 9:39 AM  
To: Dana Eady <deady@cityofsantamaria.org>  
Subject: 44 acre annexation

This is a bad idea:

1. It is in the flight path. Isn't it prohibited?
2. Traffic, traffic, traffic
3. Schools? What, we'll just impact the few schools we have?
4. Law enforcement under sheriff jurisdiction? Is there adequate coverage?
5. Parking. We do not need another Montivavo disaster, thank you.
6. We have one major grocery store. That is not enough to accommodate the community as it is now.
7. Public transportation. We have none that can assist with traffic congestion.
8. Is the city of SM budgeting for these needs? Or is the county and it's Residents going to be held \$ accountable?
9. Taxes. Who benefits? Santa Maria Or the county? As an orcutt resident I'm not wiling to pay taxes into a city that already charges me extra to use their recreational services because of my zip code and does not allow me access to their city dump services because of my zip code. I don't get a free pass.
10. We need parks! Waller serves an enormous area and tends to get overcrowded as would be expected.

A better use for this flight path acreage would be outdoor recreation for our youth such as the Maldonado center that Santa Maria has. Bringing more youth into the community without having resources is concerning for the community as a whole

You can't just start putting housing everywhere without considering long term consequences. It would be wise to have solutions BEFORE the problems arise.

Thank you.  
Anastacia Malm

Sent from my iPhone

IAM-1  
IAM-2  
IAM-3  
IAM-4  
IAM-5  
IAM-6  
IAM-7

AM-8

AM-9

AM-10

### 1.4.17.1 Response to Letter from Anastacia Malm

Comment No.	Response
AM-1	<p>The comment raises concern related to flight path restrictions associated with Santa Maria Airport. Refer to MR-4, which responds to comments related to airport hazards. Portions of the project site are located within Safety Zone 2 and Safety Zone 4, and the majority of the project site is located within Safety Zone 6 of the Santa Maria ALUCP. Uses located within Safety Zone 6 would have no limit on nonresidential development intensity or maximum lot coverage limitations.</p> <p>The compatibility of proposed land uses with aircraft noise were assessed based on the most current noise contours available for the Santa Maria Airport (Santa Barbara County Association of Governments, 2017). The airport noise contours were developed considering a multitude of factors, including (but not limited to) the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant. It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports. Please refer to the Santa Maria Airport's ALUCP for additional information regarding these airport policies.</p>
AM-2	<p>The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to transportation.</p>
AM-3	<p>The comment raises concern related to the provision of public school services. Refer to MR-2, which responds to comments related to public school services.</p>
AM-4	<p>The comment raises concern related to police protection services. Refer to MR-1, which responds to comments related to emergency services.</p>
AM-5	<p>The comment raises concern related to parking.</p> <p>Parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
AM-6	<p>The comment raises concern related to the provision of other public services, including grocery stores. Refer to MR-15, which responds to comments related to population growth and other public services. Grocery stores are typically private enterprises, and impacts to private businesses are generally not considered environmental impacts under CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
AM-7	<p>The comment raises concern related to public transportation. Refer to MR-3, which responds to comments related to the transportation system.</p>
AM-8	<p>The comment raises concern related to taxes. Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

Comment No.	Response
AM-9	<p>The comment raises concern related to the provision of public parks.</p> <p>As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Park and open space areas within the project site would be considered as part of the overall project development and would not result in physical impacts on the environment outside of those described in this EIR. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>Potential environmental impacts associated with the provision of public park facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p> <p>Refer also to MR-7, which responds to comments related to recreation and open space.</p>
AM-10	<p>The comment is a conclusion to the letter. Refer to MR-5, which responds to non-substantive comments.</p>

## 1.4.18 Carolyn and Robert McBurney

**From:** [grammakitty@verizon.net](mailto:grammakitty@verizon.net)  
**To:** Dana Eady  
**Subject:** proposed Orcutt project  
**Date:** Thursday, January 19, 2023 10:05:18 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. This area is impacted with heavy traffic coming from the freeway and has frequent accidents. We do not need more traffic feeding in and out into the adjacent roads. The Orcutt residents should have a decision as to building in our area. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier traffic conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Carolyn & Robert McBurney

CRM-1

CRM-2

CRM-3

### 1.4.18.1 Response to Letter from Carolyn and Robert McBurney

Comment No.	Response
CRM-1	<p>The comment states that the commenter is opposed to the project because of concerns related to traffic congestion and safety, noise, and pollution.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Refer also to MR-12, which responds to comments related to noise and MR-13, which responds to comments related to pollution.</p>
CRM-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CRM-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.19 Kara Miller

**From:** [Kara Miller](#)  
**To:** [Dana Eady](#)  
**Subject:** No on Annexation  
**Date:** Thursday, January 19, 2023 8:52:43 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Kara Miller

Owner  
[Kara J. Miller](#)  
[kara.j.miller](#)  
[Bravo Pizza](#)

KMi-1

KMi-2

### 1.4.19.1 Response to Letter from Kara Miller

Comment No.	Response
KMi-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
KMi-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KMi-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.20 Maria Perez

**From:** [Maria Perez](#)  
**To:** [Dana Eady](#)  
**Subject:** Proposal to Annex 44 acres near Union Valley Parkway and Highway 135  
**Date:** Thursday, January 19, 2023 9:06:26 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. I am certain the high volume of reported traffic collisions at or near this intersection speak for themselves. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. The overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike will hinder the quality of life that we were looking for when we chose to live in this part of town. Do our concerns matter or is it all about greed and money? Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Maria Perez

A Concerned Citizen

MP-1

MP-2

### **1.4.20.1     *Response to Letter from Maria Perez***

---

<b>Comment No.</b>	<b>Response</b>
MP-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
MP-2	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

---

## 1.4.21 Jesse Skoda

**From:** [Jesse Skoda](#)  
**To:** [Dana Eady](#)  
**Subject:** Stop Annex  
**Date:** Thursday, January 19, 2023 11:29:18 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

We are a family in Orcutt and the proposed plans are a terrible idea and will only ruin the small knit community. The Orcutt we once loved will fall apart if this gets approved.

JS-1

### **1.4.21.1    Response to Letter from Jesse Skoda**

---

<b>Comment No.</b>	<b>Response</b>
JS-1	Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.

---

## 1.4.22 Marisol Vazquez De Duyck

**From:** [Marisol Vazquez](#)  
**To:** [Dana Eady](#)  
**Subject:** Opposition to the proposal of annexing 44 acres in UVP and Highway 135  
**Date:** Thursday, January 19, 2023 11:51:25 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. Traffic in the mornings is unbearable already. The noise and pollution will lower the quality of life we all enjoy in Orcutt. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Existing schools are already overcrowded and our Sheriffs are constantly short staffed. I firmly oppose to move forward with plans to annex this land and all plans must stop for this development.

Sincerely,

Marisol Vazquez De Duyck

I MVD-1  
I MVD-2  
I MVD-3

### 1.4.22.1 Response to Letter from Marisol Vazquez De Duyck

Comment No.	Response
MVD-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
MVD-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
MVD-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.23 Charlee Zleisy-Wilson

**From:** [Charlee Zleisy](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP/135  
**Date:** Thursday, January 19, 2023 9:21:14 PM  
**Attachments:** [Image.jpeg](#)

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Thank you,

*Charlee Zleisy-Wilson*

Financial Assistant



540 Camino Mercado, Arroyo Grande CA 93420

Phone (805) 922-6901 | Fax (805) 202-8327

[charlee@maguireinvest.com](mailto:charlee@maguireinvest.com) | [www.maguireinvest.com](http://www.maguireinvest.com)

CZW-1

CZW-2

CZW-3

### 1.4.23.1 Response to Letter from Charlee Zleisy-Wilson

Comment No.	Response
CZW-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
CZW-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CZW-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.24 Linda Adams

**From:** Linda Adams  
**To:** Dana Eady  
**Subject:** Hwy 135 and Union Valley Parkway  
**Date:** Friday, January 20, 2023 6:16:15 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

If anyone would like to copy and paste my email, feel free! Leave it as is or edit as you see fit.  
Let's fill their inbox and let our voices be heard.  
Email: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

LAd-1

LAd-2

ILAd-3

### 1.4.24.1 Response to Letter from Linda Adams

Comment No.	Response
LAd-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
LAd-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
LAd-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.25 Dan Applebay

**From:** [Daniel Applebay](#)  
**To:** [Dana Eady](#)  
**Subject:** Proposed High Density Housing on Union Valley and Hwy 135  
**Date:** Friday, January 20, 2023 9:32:09 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am completely opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned that this new development will stress the over used ground water supply for the rest of Orcutt. Have you even considered the impact on the area schools, police services, fire protection, and emergency services? Probably not!!

Please do not move forward with plans to annex this land and stop all plans for development. Maybe this development should be proposed for the City of Santa Barbara or Montecito...

Thank you.

Dan Applebay  
Orcutt resident

DA-1  
IDA-2  
IDA-3  
DA-4

### 1.4.25.1 Response to Letter from Dan Applebay

Comment No.	Response
DA-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
DA-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
DA-3	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services. Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities.</p>
DA-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.26 Jennifer Arkinson

**From:** [Jen Arkinson](#)  
**To:** [Dana Eady](#)  
**Subject:** No to the annex if UVP  
**Date:** Friday, January 20, 2023 5:51:48 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Jennifer Arkinson

Sent from my iPhone

I JA-1  
I JA-2  
I JA-3

### 1.4.26.1 Response to Letter from Jennifer Arkinson

Comment No.	Response
JA-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JA-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JA-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.27 Natalie Bakke and Family

**From:** [Natalie McNamara](#)  
**To:** [Dana Eady](#)  
**Subject:** AGAINST OVERCROWDING ORCUTT  
**Date:** Friday, January 20, 2023 8:10:33 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Natalie Bakke and Family

I NBF-1  
I NBF-2  
I NBF-3

### 1.4.27.1 Response to Letter from Natalie Bakke and Family

Comment No.	Response
NBF-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
NBF-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
NBF-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.28 Steven Beebe

**From:** Steven Beebe  
**Sent:** Friday, January 20, 2023 7:04 PM  
**To:** Dana Eady

**Subject:** Union valley parkway and Orcutt is definitely not a spot for tall apartments and townhomes, single story business would be much more practical. Not housing!! I strongly oppose 🙅

SB 1-1

**From:** [Steven Beebe](#)  
**To:** [Dana Eady](#)  
**Date:** Friday, February 3, 2023 5:42:39 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

My wife and I are in complete agreement that there are already plenty of apartments being built in Santa Maria. We have no problem with C/P, but not more apartments and townhomes. Please try to see how many of the under construction projects do before over crowding Orcutt

SB 2-1

### **1.4.28.1    Response to Letters from Steven Beebe**

---

<b>Comment No.</b>	<b>Response</b>
SBe 1-1	The comment proposes another use. Refer to MR-5, which responds to non-substantive comments.
SBe 2-1	The comment proposes another use. Refer to MR-5, which responds to non-substantive comments.

---

## 1.4.29 Anna Blundell

**From:** [Anna Blundell](#)  
**To:** [Dana Eady](#)  
**Subject:** Concern For UVP HW135 Development  
**Date:** Friday, January 20, 2023 1:37:14 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Anna Blundell

I  
AJB-1  
I  
AJB-2  
IAJB-3

### 1.4.29.1 Response to Letter from Anna Blundell

Comment No.	Response
AJB-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
AJB-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
AJB-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.30 Lynn Burchard

**From:** [LYNN BURCHARD](#)  
**To:** [Dana Eady](#)  
**Subject:** Opposition to annex land  
**Date:** Friday, January 20, 2023 9:11:22 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Lynn Burchard

I LB-1  
I LB-2  
ILB-3

### 1.4.30.1 Response to Letter from Lynn Burchard

Comment No.	Response
LB-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
LB-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
LB-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.31 Cortez Family

**From:** [Martha Cortez](#)  
**To:** [Dana Eady](#)  
**Subject:** Orcutt Community  
**Date:** Friday, January 20, 2023 7:37:35 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Cortez Family

I  
CF-1  
I  
CF-2  
ICF-3



### 1.4.31.1 Response to Letter from Cortez Family

Comment No.	Response
CF-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
CF-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CF-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.32 Stephanie Cortner

**From:** [Stephanie Cortner](#)  
**To:** [Dana Eady](#)  
**Subject:** proposal to annex 44 acres near Union Valley Parkway and Highway 135.  
**Date:** Friday, January 20, 2023 9:32:49 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Where are the children going to go to school? It is Santa Maria annexed land and they are situated in Orcutt school district. Police and fire resources? Please do not move forward with plans to annex this land and stop all plans for development.

SC-1

SC-2

SC-3

SC-4

Thank you,

Stephanie Cortner  
3953 Larchmont Ct  
Orcutt, CA 93455

--  
Stephanie Cortner

### 1.4.32.1 Response to Letter from Stephanie Cortner

Comment No.	Response
SC-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
SC-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
SC-3	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services. Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
SC-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.33 Cherie and Eldon Cribbs

**From:** [Cherie Cribbs](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP & 135 development  
**Date:** Friday, January 20, 2023 1:52:38 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Santa Maria Council,

We oppose your plan for the development of 400 new housing/business development at UVP and 135. How are you getting away with this when our state continues to have drought issues? We've lived here since '95 and the street's conditions deteriorate rapidly at the current population. Please have a conscious and apply your common sense.

Concerned citizens,  
Cherie & Eldon Cribbs

I CEC-1  
I CEC-2

### 1.4.33.1 Response to Letter from Cherie and Eldon Cribbs

Comment No.	Response
CEC-1	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CEC-2	<p>The comment raises concern related to traffic and roadway conditions. Refer to MR-3, which responds to comments related to traffic and transportation. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>

## 1.4.34 Haylie Cribbs

**From:** [Haylie Cribbs](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP /135 objections  
**Date:** Friday, January 20, 2023 12:43:22 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am writing to express that I am greatly opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It will lead to more overcrowding, busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development here.

HC-1

HC-2

There is no need for the city to encroach this direction- why not utilize existing property located within city limits that have been sitting vacant?

HC-3

The old Costco location area, Fallas area, Edwards cinema / hometown buffet area have all been vacant for years! Rezone those areas if you must.

I understand housing shortage is an issue, but the city needs to focus on expanding infrastructure and facilities in the area BEFORE just building more dwellings.

HC-4

Where will the people grocery shop, Albertsons in Orcutt is a zoo never any parking- the only shopping options in town are Costco and Target both are always packed- parking is difficult, Target's shelves are wiped out because there are so many shoppers.

HC-5

Where will these residents attend elementary & high school? Where are they working?

HC-6

One Hospital for a city this size is outrageous- urgent cares are packed and overwhelmed-one main post office? One sheriff substation which hardly responds to calls as it is? Would you be providing City of SM police and fire to service the area as well?

There's already such a shortage of safe clean family friendly recreational activities in this area. No enjoyable bike trails or public parks that aren't littered with trash and homeless encampments, there are very few nice restaurants and retail shops in our area.

HC-7

Housing has outgrown every other aspect of this town and that leaves a whole bunch of people with nothing to do but travel to every other surrounding city and town in search of things to do with their families which equals money spent elsewhere.

HC-8

Focus on improving city of SM into a desirable place to visit not only to sleep.

Thank you,  
Haylie Cribbs

### 1.4.34.1 Response to Letter from Haylie Cribbs

Comment No.	Response
HC-1	<p>The comment raises concern related to an increase in traffic, noise, and pollution.</p> <p>Refer to MR-3, which responds to comments related to traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only.</p>
HC-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
HC-3	<p>The comment raises concern regarding annexation and suggests a different location for the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>
HC-4	<p>The comment raises concern related to the need to expand existing utility infrastructure.</p> <p>Refer to MR-14, which responds to comments related to other utilities and associated infrastructure and MR-15, which responds to comments related to population growth and other public services.</p>
HC-5	<p>The comment raises concern related to parking and the provision of other public services, including grocery stores.</p> <p>Refer to MR-15, which responds to comments related to population growth and other public services. It should be noted that the conceptual development plan includes a mix of commercial and high-density residential uses. The northern portion of the project site (north of UVP) would support most of the proposed commercial uses, allowing for up to 96,800 square feet of commercial development. Future project buildout of this space could include many different types of commercial or retail uses, such as a grocery store.</p> <p>Additionally, parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, “Environment” as used by CEQA means “the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance.” The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
HC-6	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services. Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>

Comment No.	Response
HC-7	<p>The comment raises concern related to provisions of recreational facilities, including trails.</p> <p>Refer to MR-7, which responds to comments related to parks and recreation. Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>
HC-8	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.35 Chyanne Gaona

**From:** [Chyanne Brooks](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP  
**Date:** Friday, January 20, 2023 11:03:00 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Chyanne Gaona

CG-1  
CG-2  
ICG-3

### 1.4.35.1 Response to Letter from Chyanne Gaona

Comment No.	Response
CG-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
CG-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CG-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.36 Teresa Gardner

**From:** [Teresa Gardner](#)  
**To:** [Dana Eady](#)  
**Subject:** Please Stop Annexing Orcutt!  
**Date:** Friday, January 20, 2023 8:28:39 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

[Sent from Yahoo Mail on Android](#)

TG-1  
TG-2  
ITG-3

### 1.4.36.1 Response to Letter from Teresa Gardner

Comment No.	Response
TG-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
TG-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
TG-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.37 Deborah Guerero

**From:** [gma.mushy77@gmail.com](mailto:gma.mushy77@gmail.com)  
**To:** Dana Eady  
**Subject:** Annexation  
**Date:** Friday, January 20, 2023 5:58:26 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

January 20, 2023

To Whom it May Concern,

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Deborah Guerero  
Concerned resident  
Sent from my iPhone

┌ DG-1  
├ DG-2  
└ IDG-3

### 1.4.37.1 Response to Letter from Deborah Guerero

Comment No.	Response
DG-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
DG-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
DG-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.38 Vivian R. Hernandez

**From:** [Vivian Hernandez](#)  
**To:** [Dana Eady](#)  
**Cc:** [Gloria Soto](#); [Maribel Hernandez](#); [Alice Patino](#); [Carlos Escobedo](#); [Mike Cordero](#); [Nelson@bos.countyofsb.org](#)  
**Subject:** UVP & 135  
**Date:** Friday, January 20, 2023 2:18:38 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Ms. Deady and All Corresponding Officials:

This communication is in regards to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135 and subsequent invitation for public comment.

As someone who has lived in Santa Maria all my life, I am appalled at the way the city is handling the growth of our town. Before I begin, I would like to offer a bit of background. My family of four lived in the La Vista Apartments in Santa Maria for over 15 years, before recently purchasing our home in Orcutt. If you are not familiar with the La Vista Apartments, it is a 400+ unit apartment complex in the heart of Santa Maria. I am no stranger when it comes to apartment living.

I have lived in and around apartments all my life. I grew up in extreme poverty and I am not oblivious to the fact that people need somewhere to live, but quality of living matters as well. The first major concern I have is that the city is turning a blind eye to the parking issues this development will cause. It seems the city has taken a trend to building apartments with minimal or insufficient parking spots allotted. The city pretends that public transportation is a viable option and makes up for this by adding bus stops and encouraging public transportation. This is not feasible. Working families need to drive too and from work, school, daycare etc.

Have you ever had to drive around your apartment complex 4-5x's looking for vacant parking? Have you ever had to park down the block and walk to your front door alone in the dead of night? Perhaps you have had to park several streets down from your apartment's front door, exhausted and lugging crying children, car seats, strollers and groceries along the way? Maybe you have had to call a tow truck on neighbors because someone is parked in your carport and you are in desperate need of the space yourself? These are all scenarios that I along with many apartment living patrons have lived with daily. You do not realize how detrimental lack of sufficient parking is. If there are not enough parking spaces in these proposed developments, the density in parking is going to cause a huge overcrowding issue and severely diminish quality of life for the people living in these apartments and townhomes.

Second of all, I would like to raise concerns regarding where the children of this proposed development will go to school? Does Santa Maria intend to bus them into the Santa Maria Bonita School District? The Orcutt Union School District is already heavily overpopulated.

When first relocating to Orcutt, I saw the overcrowding of Orcutt schools, and opted to keep my children in the Santa Maria Bonita School District. When this was no longer feasible, I was left with no choice but to pull my children out of the public school system and enroll them into private school. I came to this difficult decision because I needed to ensure my children were getting the academic help they were in need of. There are simply too many school age children and not enough schools in Orcutt. This causes a decline in the quality of education, which I was not willing to forego for my own children. Education is truly the pathway to success and cramming children into overcrowded classrooms is not doing them any favors.

VRH-1

VRH-2

I was able to see an issue and take action, although there are many families who do not have the privilege of moving to private education, who is going to speak up for them? I work in public education and see first hand how difficult the overcrowding and lack of space is; it already affects the quality of education being provided to the children of our community. It is simply not feasible to add another housing complex within the Orcutt Union School District without building another school.

↑  
VRH-2  
(cont'd)

Lastly, by turning a blind eye to the elimination of family and youth activities (High Way Drive-In, Paintball Field, The BMX Track, Etc.) and building nothing but apartments, you are not breaking the cycle of poverty; you are contributing to it. Listen to your constituents and reconsider the trend of building apartments in every piece of vacant land you can get your hands on.

↑  
VRH-3

I would like to note that I am not opposed to additional housing. What I have an issue with is the way the city is going about it. Listen to the people you serve. We do not want this development. If you absolutely must use every piece of vacant land, use it to build something for our youth or to build homes that families can purchase. The people deserve better than high rise and heavily condensed apartment complexes.

↑  
VRH-4

We want homes and options for our youth; build neighborhoods that will turn into a tight knit community or a place for youth to hang out and have safe, clean fun. We, the people of Santa Maria and Orcutt, are pleading that you do not move forward with plans to annex this land and stop all plans for apartment development.

Respectfully Submitted,  
Vivian R. Hernandez



### 1.4.38.1 Response to Letter from Vivian R. Hernandez

Comment No.	Response
VRH-1	<p>The comment raises concern related to parking.</p> <p>Parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
VRH-2	<p>The comment raises concern related to the provision of public school services. Refer to MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
VRH-3	<p>The comment raises concern related to the provision of public parks and recreational facilities.</p> <p>Refer to MR-7, which responds to comments related to parks and recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
VRH-4	<p>The comment is a conclusion to the comment letter. Specifically, the commenter indicates that they are not opposed to the development of housing, but they do not support the proposed project, and suggest a different type of housing.</p> <p>Refer to MR-5, which responds to non-substantive comments. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.39 Jazmín

**From:** Jazmín  
**To:** Dana Eady  
**Subject:** Opposed to annexation proposal  
**Date:** Friday, January 20, 2023 8:29:07 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. Please see below the many reasons why this would not serve toward a peaceful and prosperous Orcutt community.

- The roads are already busy and with dangerous intersections. This plan would increase the probability for more road accidents which we already see so much of it specifically at the union valley intersection.
- The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt.
- It would create overcrowding and busier road conditions for drivers, cyclists, and pedestrians. There is already a lot of concern with current overcrowding of individuals that live in single family homes and how this impacts parking outside of what is allowed. We would be seeing so much more of that if this goes through.
- Water supply is of major concern. With water supply limitations already in place, where would this resource come from and how much more would it affect us.

Please do not move forward with plans to annex this land and stop all plans for development.  
Thank you,  
A Concerned Orcutt Resident.

Sent from my iPhone

JJ-1

JJ-2

IJJ-3

### 1.4.39.1 Response to Letter from Jazmín

Comment No.	Response
JJ-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JJ-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JJ-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.40 Kristina Johnson

**From:** [Kristina Johnson](#)  
**To:** [Dana Eady](#)  
**Subject:** Against UVP & 135 development  
**Date:** Friday, January 20, 2023 6:32:41 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike.

I  
KJ-1

I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions.

I  
KJ-2

What schools will kids go to?

I  
KJ-3

What about fire and police resources?

Please do not move forward with plans to annex this land and stop all plans for development.

I  
KJ-4

Thank you, Kristina Johnson  
559-392-6241

### 1.4.40.1 Response to Letter from Kristina Johnson

Comment No.	Response
KJ-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
KJ-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KJ-3	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services.</p> <p>Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
KJ-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.41 Renee Kolding

**From:** [Renee Kolding](#)  
**To:** [Dana Eady](#)  
**Subject:** Union valley parkway annex  
**Date:** Friday, January 20, 2023 8:14:20 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Renee Kolding

RK-1  
RK-2  
RK-3

### 1.4.41.1 Response to Letter from Renee Kolding

Comment No.	Response
RK-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
RK-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
RK-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.42 Duft Family

**From:** [jamie Lynn](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch Annex project  
**Date:** Friday, January 20, 2023 4:13:30 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To whom It May Concern,

I am writing on behalf of my family for the concern and objection to the building of MORE TOWNHOMES AND APARTMENTS IN ORCUTT!

My first question is, do the people on this planning committee live in Orcutt??? Because if not then they are making decisions that impact the citizens of the city greatly but not the planners directly.

There is already a HUGE problem of overcrowding in the city, infrastructure failure due to overpopulation and the constant building of new structures! Look at what just happened to our town and the flooding from infrastructure failure- and yes MY FAMILY was directly impacted from that failure!

There is already a water shortage which more buildings/homes will only further strain the water shortage.

Traffic is a nightmare! Constant red light running and more and more accidents because of more population.

And probably the most important reason- the beautiful Orcutt trails have already been taken for MORE HOMES.. leave what little NATURAL NATURE AND SCENERY WE HAVE LEFT ALONE!!!!

Business have closed because there are not people willing to work, there are a ton of vacant office buildings so there is not a need for MORE PEOPLE to fill jobs that are not being filled as it is. The schools are over populated and crowded!

Building more townhomes and apartments is NOT BENEFICIAL, in fact the very opposite! Sincerely,  
The Duft Family and MANY RESIDENTS OF ORCUTT!!

DF-1

DF-2

DF-3

DF-4

DF-5

IDF-6

IDF-7



### 1.4.42.1 Response to Letter from Duft Family

Comment No.	Response
DF-1	<p>The comment raises concern related to utility infrastructure and potential flooding issues due to population growth.</p> <p>Refer to MR-14, which responds to comments related to utilities and associated infrastructure, MR-16, which responds to comments related to hydrology, and MR-15, which responds to comments related to population growth and other public services. With required adherence to the California Building Codes and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with off-site flooding.</p>
DF-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
DF-3	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
DF-4	<p>The comment raises concern related to impacts to visual resources, biological resources, and recreation.</p> <p>Refer to MR-10, which responds to comments relate to aesthetic resources, MR-11, which responds to comments related to biological resources, and MR-7, which responds to comments related to parks and recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
DF-5	<p>The comment raises concern related to the lack of existing employees and associated economic impacts.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
DF-6	<p>The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments relate to public school facilities.</p>

Comment No.	Response
DF-7	The comment is a conclusion to the letter, emphasizing that the commenter does not support the project. Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.

## 1.4.43 Eric and Natalie Mahoney

**From:** [Natalie Mahoney](#)  
**To:** [Dana Eady](#)  
**Cc:** [Husband](#)  
**Subject:** Stop Plans for 44 Acres on UVP in Orcutt  
**Date:** Friday, January 20, 2023 7:00:16 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135.

These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike.

I am also concerned about where the water would come from for this development, Orcutt is already on water restrictions.

Where would the police and fire resources come from? Orcutt law enforcement is already short staffed.

What district would these hundreds children go to school in? Our schools are already overcrowded.

Is it possible to have a meeting that is outside of business hours so more Orcutt residents can attend and be heard?

We ask that you do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Eric and Natalie Mahoney

ENM-1

ENM-2

ENM-3

ENM-4

### 1.4.43.1 Response to Letter from Eric and Natalie Mahoney

Comment No.	Response
ENM-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ENM-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ENM-3	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services. Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
ENM-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.44 Kayla Moore

**From:** [Kayla Moore](#)  
**To:** [Dana Eady](#)  
**Subject:** Annex  
**Date:** Friday, January 20, 2023 9:24:11 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Kayla Moore  
Sent from my iPhone

I KMo-1  
I KMo-2  
I KMo-3

### 1.4.44.1 Response to Letter from Kayla Moore

Comment No.	Response
KMo-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
KMo-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KMo-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.45 Amber Nelson

**From:** [ambernn77](#)  
**To:** [Dana Eady](#)  
**Subject:** Orcutt resident  
**Date:** Friday, January 20, 2023 12:33:24 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Amber Nelson  
Orcutt resident @  
224 Mooncrest Ln

Sent from my T-Mobile 5G Device

ANe-1

ANe-2

IANe-3

### 1.4.45.1 Response to Letter from Amber Nelson

Comment No.	Response
ANe-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ANe-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ANe-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.46 Armando Nol

**From:** ARMANDO NOL  
**To:** Dana Eady  
**Subject:** Opposition to Annexation  
**Date:** Friday, January 20, 2023 4:22:30 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. Please see below the many reasons why this would not serve toward a peaceful and prosperous Orcutt community.

- The roads are already busy and with dangerous intersections. This plan would increase the probability for more road accidents which we already see so much of it specifically at the union valley intersection.
- The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt.
- It would create overcrowding and busier road conditions for drivers, cyclists, and pedestrians. There is already a lot of concern with current overcrowding of individuals that live in single family homes and how this impacts parking outside of what is allowed. We would be seeing so much more of that if this goes through.
- Water supply is of major concern. With water supply limitations already in place, where would this resource come from and how much more would it affect us.

Please do not move forward with plans to annex this land and stop all plans for development. Thank you,

A Concerned Orcutt Resident.

ANo-1

ANo-2

IANo-3

### 1.4.46.1 Response to Letter from Armando Nol

Comment No.	Response
ANo-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
ANo-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
ANo-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.47 Jazmin Nol

**From:** [Jazmin Nol](#)  
**To:** [Dana Eady](#)  
**Subject:** Opposition to annexation proposal  
**Date:** Friday, January 20, 2023 8:28:20 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. Please see below the many reasons why this would not serve toward a peaceful and prosperous Orcutt community.

- The roads are already busy and with dangerous intersections. This plan would increase the probability for more road accidents which we already see so much of it specifically at the union valley intersection.
- The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt.
- It would create overcrowding and busier road conditions for drivers, cyclists, and pedestrians. There is already a lot of concern with current overcrowding of individuals that live in single family homes and how this impacts parking outside of what is allowed. We would be seeing so much more of that if this goes through.
- Water supply is of major concern. With water supply limitations already in place, where would this resource come from and how much more would it affect us.

Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
A Concerned Orcutt Resident.

JN-1

JN-2

IJN-3

### 1.4.47.1 Response to Letter from Jazmin Nol

Comment No.	Response
JN-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JN-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JN-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.48 Sandra A. Peterson

**From:** Sandy  
**To:** Dana Eady  
**Subject:** City of SM Proposed Annexation  
**Date:** Friday, January 20, 2023 9:15:43 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am **opposed** to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections.

The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike.

I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions.

It is also a major concern to know that emergency services would be strained. Would those costs be paid for by the city or the county?

Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

Sandra A. Peterson  
Orcutt Resident

SAP-1

SAP-2

SAP-3

SAP-4

### 1.4.48.1 Response to Letter from Sandra A. Peterson

Comment No.	Response
SAP-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
SAP-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
SAP-3	<p>The comment raises concern related to the provision of emergency services.</p> <p>Refer to MR-1, which responds to comments related to emergency services. Implementation of the project would result in the annexation of the project site into the City of Santa Maria, including changing the service area boundary so that the project site would be within the jurisdictional boundary of SMFD rather than SBCFD. As well, as part of the annexation process, the City would need to develop a Resolution of Application to Initiate Annexation, including Adoption of a Plan for Services. The Plan for Services would identify how the City and SMFD would serve the project site using available facilities. If the Santa Barbara County Local Agency Formation Commission provides approval of the annexation, the County and City would move to a negotiation process to identify a fair and appropriate Property Tax Sharing Agreement. It is through this process that consideration for the sharing of property tax revenues from the proposed project to support City and County services, including fire protection services, would be determined.</p>
SAP-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.49 Peggy Rokos

**From:** [Peggy Rokos](#)  
**To:** [Dana Eady](#)  
**Date:** Friday, January 20, 2023 1:50:35 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

As a resident of 53 years in Orcutt I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Where do we plan on the new residents (if this gets approved) sending their kids to school? They are already overcrowded. It's too much too soon all for someone to make money, leaving the existing residents with the burdens mentioned above.

Please reconsider this plan. Our property taxes keep going up while more and more people move here. Why? My home is now surrounded by all new homes, yet my taxes never go down.

Regards,

PR-1

PR-2

PR-3

PR-4

### 1.4.49.1 Response to Letter from Peggy Rokos

Comment No.	Response
PR-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
PR-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
PR-3	<p>The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
PR-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.50 Martha Silva

**From:** [Martha Silva](#)  
**To:** [Dana Eady](#)  
**Subject:** Annex  
**Date:** Friday, January 20, 2023 1:02:07 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Martha Silva

MSi-1

MSi-2

MSi-3

### 1.4.50.1 Response to Letter from Martha Silva

Comment No.	Response
MSi-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
MSi-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
MSi-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.51 Patricia S. Sly (Feighner)

**From:** [Patricia Sly-Feighner](#)  
**To:** [Dana Eady](#)  
**Cc:** [Kyle Feighner](#)  
**Subject:** Please NO  
**Date:** Friday, January 20, 2023 7:55:43 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Email: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)

To Whom it May Concern:

We are opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Think of us, our families who already cannot afford rent and double up with us. Water!  
Water!

This is just unacceptable!

Thank you,

Thank you,

**Patricia S. Sly (Feighner), Notary Public**

**Cell: (805) 478-8052**

Email: [PatriciaSlyFeighner@gmail.com](mailto:PatriciaSlyFeighner@gmail.com)

Fax: (805) 764-8306

"Saving one animal will not change the world, but surely for that one animal, the world will change forever".

[www.PatriciaSly.com](http://www.PatriciaSly.com)

PSF-1

PSF-2

PSF-3

### 1.4.51.1 Response to Letter from Patricia S. Sly (Feighner)

Comment No.	Response
PSF-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
PSF-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
PSF-3	<p>The comment raises concern related to economics.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

## 1.4.52 Katie Sly

**From:** [Katie Sly](#)  
**To:** [Dana Eady](#)  
**Subject:** To Whom it May Concern  
**Date:** Friday, January 20, 2023 1:12:29 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Katie Sly

I KS-1  
I KS-2  
I KS-3

### 1.4.52.1 Response to Letter from Katie Sly

Comment No.	Response
KS-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
KS-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KS-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.53 Dr. Jacob and Melinda Studer

**From:** Melinda  
**To:** Dana Eady  
**Subject:** The 44 Acres  
**Date:** Friday, January 20, 2023 1:01:48 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

We are opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135.

-These roads are already busy thoroughfares with dangerous intersections. We live close to this intersection. Please look into how many crashes happen here. Especially since people can't turn left from Foxenwood onto Clark. Our 7 year old daughter even notices how often there are accidents at Union Valley and 135. Just recently, when asking about debris in the road she saw from an accident, she exclaimed, "an accident again!" The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike.

-We are also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions.

- Fire protection? That area is already in a fire department "doughnut hole," since the airport fire house is in the city of S. What dept will respond?

The planned new fire dept just up from Site 26 off UVP was to be for the county residents.

- Law enforcement? Will SMPD drive to Site 26 homes and businesses to respond? Or will our already short staffed Sheriffs have to cover city property?

- Proposal allows for 2 vehicles per household. How's that working at the Montivao condos?

- Where will the hundreds of children from 497 new households attend school? Existing schools are already overcrowded, with numerous portable classrooms in use.

Traffic in that area is jammed each morning and afternoon with students being dropped off and picked up. Will an elementary school be built? Can OJHS and RHS assimilate hundreds more?

Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Dr. Jacob and Melinda Studer

JMS-1

JMS-2

JMS-3

JMS-4

JMS-5

JMS-6

### 1.4.53.1 Response to Letter from Dr. Jacob and Melinda Studer

Comment No.	Response
JMS-1	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JMS-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JMS-3	<p>The comment raises concern related to the provision of emergency service. Refer to MR-1, which responds to comments related to emergency services. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>
JMS-4	<p>The comment raises concern related to parking.</p> <p>Parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
JMS-5	<p>The comment raises concern related to traffic and the provision of public school facilities.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, and MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
JMS-6	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.54 Carol Toney

**From:** Carol Toney  
**To:** Dana Eady  
**Subject:** Annexation of Orcutt  
**Date:** Friday, January 20, 2023 2:58:48 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. This project would also put a hardship on our fire and police as well as schools. I am certain there will not be monies appropriated for those entities. Annexation will bring a temporary bonus to the city with long-term negative consequences for Orcutt. In addition, we do not need more retail, most retail centers in Orcutt and Santa Maria are nowhere near capacity, they are just a tax write off for the property owners. There are more than enough drive-thrus already on Betteravia. Annexing property outside city limits is wrong and not good for our community and environment. Please do not move forward with plans to annex this land and stop all development plans.

Thank you,  
Carol Toney

CTo-1  
CTo-2  
ICTo-3  
CTo-4  
ICTo-5

### 1.4.54.1 Response to Letter from Carol Toney

Comment No.	Response
CTo-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
CTo-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CTo-3	<p>The comment raises concern related to the provision of public services, including school facilities and emergency services. Refer to MR-1, which responds to comments related to emergency services and MR-2, which responds to comments related to public school facilities. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>
CTo-4	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
CTo-5	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.55 Karli Tripp

**From:** Karli  
**To:** Dana Eady  
**Subject:** Opposition of annex 44 acres near UVP  
**Date:** Friday, January 20, 2023 5:31:40 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,  
Karli Tripp.

KT-1  
KT-2  
IKT-3

### 1.4.55.1 Response to Letter from Karli Tripp

Comment No.	Response
KT-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
KT-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KT-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.56 James D Valente

**From:** JAMES VALENTE  
**To:** Dana Eady  
**Subject:** Opposing Orcutt Annex  
**Date:** Friday, January 20, 2023 9:40:44 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

James D Valente

J  
JDV-1  
J  
JDV-2  
J  
JDV-3

### 1.4.56.1 Response to Letter from James D Valente

Comment No.	Response
JDV-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
JDV-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
JDV-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.57 Noemi Vargas

**From:** [Noemi Vargas](#)  
**To:** [Dana Eady](#)  
**Subject:** no on annex  
**Date:** Friday, January 20, 2023 12:03:02 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development. You should be there in the morning, see how traffic gets and in the evenings after 3 it's a nightmare  
Thank you,

I NV-1  
I NV-2  
I NV-3

### 1.4.57.1 Response to Letter from Noemi Vargas

Comment No.	Response
NV-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
NV-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
NV-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>



## 1.4.58 Curtis Warner

**From:** [ckw71977@gmail.com](mailto:ckw71977@gmail.com)  
**To:** [Dana Eady](#)  
**Subject:** UVP-135 project  
**Date:** Friday, January 20, 2023 8:12:38 AM  
**Attachments:** annexation.docx

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Dan Eady,

Please see the attached for my comment on this project

Curtis Warner

Dear Dana Eady,

I am writing regarding the proposal to annex 44 acres at UVP and 135 into the city and then develop it with high density housing.

To say I am opposed to this idea is a gross understatement. There is absolutely no benefit to the residents of the unincorporated area that would surround this proposal. This area should be developed, no question, but it should conform to the surrounding area. Commercial development should be designed to meet the needs of the surrounding area. We don't need more drive throughs or gas stations.

There are also numerous other problems:

- You can bet the roads in the area are not part of the annexation proposal, so county taxpayers will have to foot the bill to maintain the roads.
- As these projects always seem to have less than adequate parking on site, people will park all over the place, creating traffic hazards.
- There are numerous vacant lots and vacant buildings in Santa Maria for this type of project. Infill first before annexation. The area of the old Costco/Hometown buffet/ Edwards cinema/Texas roadhouse come to mind. What about the area from PVHS to the dump along Main Street? Etc, Etc.
- This is a finger of an annexation—not a logical continuation of city limits. The properties from this development north to Miller Ave will still be unincorporated- a distance of about 2 miles.
- There are no city services close by, so county taxpayers will be footing the bill for police and fire. Does anyone really think Santa Maria will be sending an engine from Carmen Lane when a county station will be ½ mile down the road on UVP? Is the city PD going to actively patrol this finger of land or just get SO to handle? High density housing historically has a higher crime rate than single family homes. Is SMPD going to put a substation in the area or dedicate a patrol to the area?
- There are no services such as grocery stores, clothing stores and govt services close.
- No Schools are closeby—kids will be walking to school on roads with no sidewalks.
- Public transportation is not in this area.
- All of the roads in this area are rather high speed and high volume. We have already seen numerous accidents in the area. Putting in high density housing seems to be inviting a catastrophe. Will the city be assuming responsibility for a bunch of kids getting hit crossing the street?
- As demonstrated with the recent rains, flooding can occur in the area. Will the city be assuming some responsibility for the flood control basins in the area, storm drains, etc?

Finally, would the proponents of this incompatible development want it in their neighborhood? If not, why do they expect Orcutt to accept it?

Respectfully Submitted,

Curtis Warner

239 Raymond Ave

Santa Maria

805-478-1231

CW-1

CW-2

CW-3

CW-4

ICW-5

ICW-6

ICW-7

CW-8

CW-9

CW-10

### 1.4.58.1 Response to Letter from Curtis Warner

Comment No.	Response
CW-1	The comment is an introduction to the letter. Refer to MR-5, which responds to non-substantive comments.
CW-2	<p>The comment raises concern related to roadway conditions, roadway hazards, and parking.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
CW-3	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
CW-4	<p>The comment raises concern related to the provision of police and fire protection services.</p> <p>Refer to MR-1, which responds to comments related to emergency services. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>
CW-5	<p>The comment refers to the provision of other public services, including grocery stores.</p> <p>Refer to MR-15, which responds to comments related to population growth and other public services. However, grocery stores are typically private enterprises, and impacts to private businesses are generally not considered environmental impacts under CEQA.</p>
CW-6	<p>The comment raises concern related to the safety of school-aged children traveling to designated school sites.</p> <p>Refer to MR-2, which responds to comments related to public school facilities. Further, the distance children need to travel to attend school is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
CW-7	The comment raises concern related to the lack of existing transportation services. Refer to MR-3, which responds to comments related to traffic and transportation.
CW-8	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>

Comment No.	Response
CW-9	The comment raises concern related to flooding and stormwater control measures. Refer to MR-16, which responds to comments related to hydrology. With required adherence to the California Building Codes and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with off-site flooding.
CW-10	The comment is a conclusion to the letter, emphasizing that the commenter does not support the project. Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.

*This page intentionally left blank.*

## 1.4.59 Lois Weddle

**From:** [loisweddle@gmail.com](mailto:loisweddle@gmail.com)  
**To:** Dana Eady  
**Subject:** annexation  
**Date:** Friday, January 20, 2023 1:09:29 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I realize that the county needs housing, but you can't tell me that the city is going to allow an "island" for very long, before they annex all of us into the city. People out here with our animals and horses bought in the county for a reason. The rural and county run area is where most of us prefer to be. Having to increase virtually every single thing to accommodate city services will be terribly expensive. The jurisdictional lines will be a nightmare. We have building in the 93455 zip EVERYWHERE. When is enough, enough? How much sacrificing should one community have to make?

Lois Weddle  
Unincorporated area resident

LW-1

### **1.4.59.1    *Response to Letter from Lois Weddle***

---

<b>Comment No.</b>	<b>Response</b>
LW-1	<p>The comment raises concern related to the proposed annexation of the project site and public services. The comment also claims that the project would result in a municipal island.</p> <p>Refer to MR-2, which responds to comments related to public school facilities, MR-7, which responds to comments related to parks and recreation, MR-8, which responds to comments related to annexation and economics and MR-15, which responds to comments related to population growth and other public services. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p>

---

## 1.4.60 Nancy Jensen

**From:** [RichardNancy Jensen](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch  
**Date:** Saturday, January 21, 2023 12:49:19 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

While I support and see the need for the planned development of quality housing in the general Santa Maria, as well as light commercial development, I do have a few concerns.

Parking: I have seen the severe impact on the local neighborhoods of other multiunit developments. What proactive measures are incorporated in these plans to accommodate the needs of a realistic number of occupants and vehicles? Specifically, how many parking spaces are there for 400 apartments?

Schools: While incorporated into the City of Santa Maria, the designated area would be totally within the boundaries of the Orcutt Union School District. How will this be addressed?

Airport: The Santa Maria Airport is a vital and active part of the community. The designated area is in a high traffic area for all flights coming in. There are already complaints and concerns about the safety and noise impact on residential areas within the flight path and surrounding areas during both routine operations and special activities, especially military aircraft. How will this development be compatible with these conditions?

I look forward to more information about this being made readily available to the community.

Nancy Jensen

NJ-1

NJ-2

NJ-3

NJ-4



### 1.4.60.1 Response to Letter from Nancy Jensen

Comment No.	Response
NJ-1	<p>The comment raises concern related to parking.</p> <p>Parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
NJ-2	<p>The comment raises concern related to the provision of public school facilities.</p> <p>Refer to MR-2, which responds to comments related to public school facilities. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
NJ-3	<p>The comment raises concern related to flight path restrictions associated with Santa Maria Airport.</p> <p>Refer to MR-4, which responds to comments related to airport hazards. Portions of the project site are located within Safety Zone 2 and Safety Zone 4, and most of the project site is located within Safety Zone 6 of the Santa Maria ALUCP. Uses located within Safety Zone 6 would have no limit on nonresidential development intensity or maximum lot coverage limitations.</p> <p>The compatibility of proposed land uses with aircraft noise were assessed based on the most current noise contours available for the Santa Maria Airport (Santa Barbara County Association of Governments, 2017). The airport noise contours were developed considering a multitude of factors, including (but not limited to) the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant. It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports. Please refer to the Santa Maria Airport's ALUCP for additional information regarding these airport policies.</p>
NJ-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.61 Steigler

**From:** [steigler@verizon.net](mailto:steigler@verizon.net)  
**To:** [Dana Eady](#)  
**Subject:** Richard's Ranch Annexation  
**Date:** Saturday, January 21, 2023 8:21:18 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I would like to receive email updates of progress & future meetings regarding this annexation.  
Thank you

I Ste-1

Sent from the all new AOL app for iOS

### **1.4.61.1    Response to Letter from Steigler**

---

<b>Comment No.</b>	<b>Response</b>
Ste-1	This comment requests notifications of meetings. Refer to MR-5, which responds to non-substantive comments.

---

## 1.4.62 Francine Hutchinson

**From:** [Francine Hutchinson](#)  
**To:** [Dana Eady](#)  
**Subject:** development at UVP and 135  
**Date:** Sunday, January 22, 2023 9:15:21 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Please do not annex all tis land for dense housing. Show respect for SM, Orcutt and residents.

Thank you.

Francine Hutchinson

Sent from [Mail](#) for Windows



Virus-free [www.avast.com](http://www.avast.com)

IFH-1

### **1.4.62.1     Response to Letter from Francine Hutchinson**

---

<b>Comment No.</b>	<b>Response</b>
FH-1	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

---

## 1.4.63 Salvador Morales

**From:** [Salvador Morales](#)  
**To:** [Dana Eady](#)  
**Subject:** Annexation of 44 Acres for Santa Maria  
**Date:** Sunday, January 22, 2023 9:08:31 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To whom it may concern,

I disagree with the proposal to annex the 44 acres. There are far better areas near already existing shopping centers that can be used to provide commercial and residential options. As a community Orcutt and Santa Maria need more housing options where people can become owners, not high density housing where the tenants keep paying one entity. That does not give one benefit to the community. Santa Maria should not have to invest and take on more responsibilities of the county with taking Orcutt land. Let Orcutt stay small and handle their own financing issues. Santa Maria has enough terrible high density housing, traffic, and crime to deal with.

Please don't ruin an already busy area. I have heard that city's have started moving towards making business close to each other. Mixing business with residences. Why add more pollution and a shopping center in the middle of nowhere when there are other shopping centers that can be improved. I understand someone here is trying to ask money by offloading some land. Let the rich get richer and poor get poorer. So much for an all American town. This is just the beginning. The high way drive in is a great upgrade but this is ridiculous. I strongly oppose.

Regards,

Salvador

SM-1

### 1.4.63.1 Response to Letter from Salvador Morales

Comment No.	Response
SM-1	<p>The comment raises concerns related to the traffic, emergency services and the proposed annexation of the project site. The comment also suggests citing the project in another location.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-3, which responds to comments related to traffic and transportation, and MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>

## 1.4.64 Ardis Neilsen

**From:** [ARDIS NEILSEN](#)  
**To:** [Dana Eady](#)  
**Subject:** New housing project  
**Date:** Sunday, January 22, 2023 4:28:27 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom It May Concern,

I realize the need for more housing, but my concern is water. Areas around Orcutt and Santa Maria are facing water shortages. What impact is continued growth going to have on limited water availability?

Ardis Neilsen

Orcutt resident

ArN-1



### 1.4.64.1 Response to Letter from Ardis Neilsen

Comment No.	Response
ArN-1	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>

## 1.4.65 Mary Jo Silbernagle

**From:** [MJ Silbernagle](#)  
**To:** [Dana Eady](#)  
**Subject:** Annexation  
**Date:** Sunday, January 22, 2023 11:10:29 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To whom it may concern,

Please do not take anymore of Orcutt and put it into the city of Santa Maria sphere. We the residents are just fine living in the un-incorporated Orcutt community. There are no Benita to us to be pulled into the city of Santa Maria. We do just fine living in our community as it stands. The township of Old Orcutt would be hurt by encroaching into our small community. Please do not let money be the only factor in future planning. Contact me if you want to discuss my concerns in more details. Mary Jo Silbernagle 808 780 2945. Homeowner in old orcutt since 1974.

Sent from my iPhone

MJS-1

### **1.4.65.1     Response to Letter from Mary Jo Silbernagle**

---

<b>Comment No.</b>	<b>Response</b>
MJS-1	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

---

## 1.4.66 Candace Thompson

**From:** [Candace Thompson](#)  
**To:** [Dana Eady](#)  
**Subject:** UVP and 135 proposed project  
**Date:** Monday, January 23, 2023 1:23:54 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

As an Orcutt resident that uses UVP, I am highly against this proposed new development! Traffic is already highly impacted in the area and many car accidents have occurred in that specific intersection. Please do not approve this project!

Candace Thompson  
1062 Camelot Drive

Smile at the next person you see:)

CTH-1

### 1.4.66.1 Response to Letter from Candace Thompson

Comment No.	Response
CTH-1	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only.</p>

## 1.4.67 Lynnetta Zuzow

**From:** [Lynnetta Zuzow](#)  
**To:** [Dana Eady](#)  
**Subject:** Key Site 26 in Orcutt, proposed development - light needed at UVP & Morning Ridge  
**Date:** Monday, January 23, 2023 10:46:30 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello Ms. Eady,

I would like to raise a concern with the proposed development on Union Valley Parkway regarding traffic. Although I would prefer to see more single family homes built versus apartments or townhouses, either option is going to create more traffic on Union Valley Parkway.

I understand that a traffic light is going to be considered at Hummel & UVP but I would like the planning committee to also consider the issue of traffic on Morning Ridge Rd & UVP.

You may or may not be aware of another development proposed at the end of Morning Ridge Rd and Foster Rd that is already a concern for residents due to the increase in traffic. If this development on site 26 goes through as well as the development on Morning Ridge & Foster, traffic, which is already terrible, is going to become unbearable.

The intersection at UVP and Morning Ridge has already seen several accidents with people trying to enter UVP from Morning Ridge. There are also children that use this intersection when walking to and from school from the Woodmere neighborhood to get to either St. Joe's or Righetti. Not all cars stop completely to let the kids cross. I beg you to consider putting a traffic light on UVP at Morning Ridge Rd.

Thank you for considering my concerns.  
Lynnetta Zuzow  
4191 Morning Ridge Rd.  
Orcutt (805) 888-7114

LZ-1

### 1.4.67.1 Response to Letter from Lynnetta Zuzow

Comment No.	Response
LZ-1	<p>The comment raises concern related to traffic congestion and safety, and requests the installation of a traffic light at the intersection of UVP and Morning Ridge Road.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Furthermore, the intersection of UVP and Morning Ridge Road is located over 1-mile east of the project site. This intersection was determined to not be within the necessary scope of the Traffic and Circulation Study completed for the project. It is important to note that, with the passage of SB 743, intersection operations and roadway capacity analyses are generally outside of the scope of CEQA. Therefore, any improvements to this intersection would be outside the scope of the environmental analysis required for the project.</p>

## 1.4.68 Michelle Betty

**From:** [Michelle Betty](#)  
**To:** [Dana Eady](#)  
**Subject:** No more build on UVP  
**Date:** Tuesday, January 24, 2023 8:27:45 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I live in Foxenwood Estates and in the last five years we have had too much building especially Around the recent UVP, without the necessary caring of wildlife or leaving open spaces. You've cut down all the old eucalyptus trees that used to line our streets.  
There is no sense of common architecture when you do build something and the only beautiful little town we have left is Old Orcutt.  
now we have a sinkhole on UVP.  
Who's fault is that? Please reconsider building!!!  
Regards  
Michelle Betty  
1090 Foxenwood Dr.  
Orcutt California

Sent from my iPhone

MB-1  
MB-2  
MB-3



### 1.4.68.1 Response to Letter from Michelle Betty

Comment No.	Response
MB-1	<p>The comment raises concern related to biological resources, including wildlife, open space, and trees.</p> <p>Refer to MR-11, which responds to comments related to biological resources and MR-7, which responds to comments related to parks and recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
MB-2	<p>The comment raises concern related to impacts to visual resources. Refer to MR-10, which responds to comments relate to aesthetic resources.</p>
MB-3	<p>The comment raises concerns related potential flooding issues, impacts to utility infrastructure, and population growth.</p> <p>Refer to MR-14, which responds to comments related to utilities and associated infrastructure, MR-15, which responds to comments related to population growth and other public services, and MR-16, which responds to comments related to hydrology. With required adherence to the California Building Codes and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with off-site flooding.</p>

## 1.4.69 Elizabeth Lopez-Doll

**From:** [Elizabeth Lopez-Doll](#)  
**To:** [Dana Eady](#)  
**Subject:** Oppose the proposal!  
**Date:** Wednesday, January 25, 2023 1:29:35 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I'm writing to tell you I completely oppose the UVP proposal to annex 44 acres for residential and commercial development. The reason I moved to Orcutt in the first place is because it's a nice quiet place. I live off Morning Ridge and need to make a left onto UVP everyday to get myself to work. As things are right now, it's a maddening task. Can you imagine if you add 400 more people trying to get to work in the morning?!?! No thank you! Please do not go through with this plan.

-Elizabeth Lopez-Doll

Sent from my iPhone

ELD-1

### **1.4.69.1     *Response to Letter from Elizabeth Lopez-Doll***

---

<b>Comment No.</b>	<b>Response</b>
ELD-1	The comment raises concern related to an increase in traffic and noise. Refer to MR-3, which responds to comments related to traffic and transportation, and MR-12, which responds to comments related to noise.

---

## 1.4.70 Alan and Barbara Walker

**From:** [Alan Walker](#)  
**To:** [Dana Eady](#)  
**Subject:** Annexation of Orcutt  
**Date:** Wednesday, January 25, 2023 11:25:46 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To whom it may concern,

I am just one of many, outraged, concerned residents of Orcutt.  
I live just down the street from your proposed annexation of UVP and 135.  
I can hardly believe that such a plan even made it this far!  
UVP and 135 are so impacted already, with horrendous traffic and constant dangerous collisions. Leaving in the mornings for work? Its a mess, then repeated again in the afternoons, on the way home.  
Such crowding of so many buildings and hundreds more people, in this area, will only add to the stress, and crime that is taking over this small community. The gangs are evident as well!  
Our streets are a mess, filled with potholes! I have been waiting for years to have our street repaved. Now you want to add more traffic, more people?  
We the residents of Orcutt, are not supporting this!

Respectfully submitted,  
Alan and Barbara Walker

ABW-1

ABW-2

ABW-3

### **1.4.70.1     Response to Letter from Alan and Barbara Walker**

<b>Comment No.</b>	<b>Response</b>
ABW-1	The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to traffic and transportation system.
ABW-2	The comment raises concern related to the provision of police protection services. Refer to MR-1, which responds to comments related to emergency services.
ABW-3	The comment raises concern related to impacts to infrastructure and population growth. Refer to MR-14, which responds to comments related to utilities and associated infrastructure and MR-15, which responds to comments related to population growth and other public services.

## 1.4.71 Ken Hough

**From:** Ken Hough  
**To:** susan.bryant  
**Cc:** Dana Fady; ken@sbcac.org; Nadia Abushanab; jeanne@sbcac.org; Citizens Planning Association  
**Subject:** Re: Richards Ranch draft EIR additional comment  
**Date:** Saturday, January 28, 2023 1:04:51 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Thank you Susan! I live about three miles east of there and our neighborhood is surrounded by **eucalyptus** trees. It's nothing like Pismo, but we have seen Monarchs in our yard (maybe the milkweed we planted helped) and the trees are full of bees at various times of the year. The dense grove should be preserved and become even more of an amenity for the surrounding neighborhoods.

Ken

On Sat, Jan 28, 2023 at 12:42 PM susan bryant <bryant7@gmail.com> wrote:  
An additional comment for draft EIR

Regarding **Aesthetics (4.1)**. In my original comments I questioned removal of eucalyptus trees and the rationale that it is okay to remove monarch habitat because so few have been counted and there are many more in Pismo.

Further acknowledgment for my concern can be found in the January 24 press release (screen shot below) and a January 28, 2023, SLO Tribune article: "Monarch Butterfly Conservation Gets \$10 Million as SLO County population Rebounds."

Carbajal stated he is "pleased we were able to secure this important increase in federal resources *for preserving and growing the monarch populations in our region and across the western United States*". [My emphasis added.]

As Panetta stated: "The decline of monarch butterfly populations poses a serious threat to our environment, farmers, food supply and the *very character of our communities in California*." [My emphasis added.]

Panetta went on to say: "This funding for the newly created Monarch and Pollinator Highway Program is critical to *empowering state and local governments to restore the habitats of these essential pollinators*. For generations, many Californians, including me and my family, have had the privilege of experiencing the migration of the western monarch butterfly, and providing the funding for more habitats is the least that we can do to ensure survival of this amazing species."

*Evidently our state representatives are not giving short shrift to the monarch butterfly and our community as the Richards Ranch developer and the City appear to be.*

Susan Bryant

--  
Ken Hough  
Executive Director  
SBCAN  
(805) 563-0463

KH-1

### **1.4.71.1    *Response to Letter from Ken Hough***

---

<b>Comment No.</b>	<b>Response</b>
KH-1	The comment raises concern related to wildlife that utilize the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.

---

## 1.4.72 Robert Whittier

**From:** [ArmyNavyVeteran ArmyNavyVeteran](#)  
**To:** [Dana Eady](#)  
**Subject:** Log my concern against Richards Ranch Annexation  
**Date:** Saturday, January 28, 2023 12:23:48 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Robert Whittier  
842 Comanche  
Santa Maria Ca 93455

The massive project will have a dense population. Our little street can't handle the additional traffic. If you are looking for something to do re pave my street, It has't seen any love for over a Decade.

Orcutt is bound to grow, but spread it out some. Too many rats in a cage and they eat each other.

Boo hiss on Richards Ranch.

Thanks, you have my 2 cents.

Robert Whittier  
8054787795

RW-1



### **1.4.72.1    Response to Letter from Robert Whittier**

---

<b>Comment No.</b>	<b>Response</b>
RW-1	The comment raises concern related to roadway conditions and population growth. Refer to MR-3, which responds to comments related to traffic and transportation and MR-15, which responds to comments related to population growth and other public services.

---

## 1.4.73 Sofy

**From:** [sofy123@aol.com](mailto:sofy123@aol.com)  
**To:** Dana Eady  
**Subject:** Richards ranch  
**Date:** Sunday, January 29, 2023 8:35:05 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

nnexa

I oppose the Richards ranch a

ISo-1

### **1.4.73.1    *Response to Letter from Sofy***

---

<b>Comment No.</b>	<b>Response</b>
So-1	This comment states opposition to the project. Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.

---

## 1.4.74 Pam Mathews

**From:** Pam Silva  
**To:** Dana Eady  
**Subject:** Annexation  
**Date:** Monday, January 30, 2023 6:31:24 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I am strongly opposed to the annexation of property in Orcutt into the city of Santa Maria. It would create an island of city limits miles from SM. Traffic would also impact our neighborhoods negatively.

Pam Mathews  
4942 Stuart Dr.  
93455

PM-1

### **1.4.74.1     *Response to Letter from Pam Mathews***

---

<b>Comment No.</b>	<b>Response</b>
PM-1	<p>The comment raises concern related to an increase in traffic and claims that the project would result in a municipal island.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation and MR-8, which responds to comments related to annexation and economics. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p>

---

## 1.4.75 Charlotte Pettit

**From:** [Charlotte Pettit](#)  
**To:** [Dana Eady](#)  
**Subject:** Richard Ranch Annex  
**Date:** Monday, January 30, 2023 11:52:42 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hi,

I'd like to voice my opinion about the Richards Ranch Annexation. I live nearby and I think it would be a horrible mistake to allow Orcutt land to go to Santa Maria. It also would not be in the best interest of the current home owners nearby. It's too dense, not enough parking, and not needed. This space should be used to build a community pool, as Orcutt does not have a community pool and nor does most of their schools. My kids attend OAHS and are on the swim team. This year they can only afford to rent Santa Maria pool just two days a week for practice. How horrible! Let's focus on building new schools in Orcutt and community pools and community activity areas. We do not need dense housing areas and have nothing to offer the people who currently live in the area. We have already too many new developments that aren't adding more schools to Orcutt nor activities for the families they are selling to.

Thanks for listing and hearing us!

Charlotte Pettit  
805-717-7457

CP-1

### **1.4.75.1 Response to Letter from Charlotte Pettit**

---

<b>Comment No.</b>	<b>Response</b>
CP-1	<p>The comment raises concern related to parking, annexation, and proposes a different use for the project site. Refer to MR-8, which responds to comments related to annexation and economics. In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>

---

## 1.4.76 Donna Pulling

**From:** [donna pulling](#)  
**To:** [Bob.Nelson@countyofsb.org](mailto:Bob.Nelson@countyofsb.org); [Dana Eady](#)  
**Cc:** [donna pulling](#)  
**Subject:** Annexation at Union Valley  
**Date:** Monday, January 30, 2023 8:54:40 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Good morning Supervisor Nelson and Ms. Eady,

Have you considered the traffic impact on the area with this proposed high density development? Have you considered the public safety impact? Just two reasons why I oppose this high density mixed use development, despite the "lower housing densities than the state requirements". This is a bad idea that will negatively impact the public safety and sanitation infrastructure as well as increased traffic in the community.

As a property owner and new resident, I don't want this kind of development.

There is also the Water allocation concern.

I will be joining other neighbors and community members who oppose this development.

Donna Pulling  
295 N Broadway  
Orcutt

DP 1-1



**From:** [donna pulling](#)  
**To:** [Bob.Nelson@countyofsb.org](#); [Dana Eady](#)  
**Cc:** [donna pulling](#)  
**Subject:** RE: Annexation at Union Valley  
**Date:** Monday, February 27, 2023 5:09:16 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Mr. Nelson and Ms. Eady,

Im resending the email from Jan 30 opposing the high density development at Union Valley and Hwy 135

for all the same reasons as well as those listed in the February issue of the Orcutt Pioneer by Steve Southwick.

Increased burden on traffic, schools, roads, police and fire, library, parks, loss of Eucalyptus and #6 The Orcutt Community Plan adopted to provide county guidance for development in the Orcutt community, would not apply!!

Im a property owner and taxpayer and I say No, No, No.

Donna Pulling  
295 N Broadway  
Orcutt

**From:** [donna pulling](#)  
**Sent:** Monday, January 30, 2023 8:54 AM  
**To:** [Bob.Nelson@countyofsb.org](#); [deady@cityofsantamaria.org](#)  
**Cc:** [donna pulling](#)  
**Subject:** Annexation at Union Valley

Good morning Supervisor Nelson and Ms. Eady,

Have you considered the traffic impact on the area with this proposed high density development?  
Have you considered the public safety impact? Just two reasons why I oppose this high density mixed use development, despite the "lower housing densities than the state requirements". This is a bad idea that will negatively impact the public safety and sanitation infrastructure as well as increased traffic in the community.

As a property owner and new resident, I don't want this kind of development.

There is also the Water allocation concern.

I will be joining other neighbors and community members who oppose this development.

Donna Pulling  
295 N Broadway  
Orcutt

DP 2-1

DP 2-2

### 1.4.76.1 Response to Letter from Donna Pulling

Comment No.	Response
DP-1	<p>The comment raises concern related to public services, utilities, water supply, wastewater infrastructure, and traffic.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-3, which responds to comments related to traffic and transportation, MR-6, which responds to comments related to water supply, MR-14, which responds to comments related to utilities and associated infrastructure, and MR-15, which responds to comments related to population growth and other public services.</p>
DP 2-1	<p>The comment raises concern related to public schools, emergency services, parks, libraries, and biological resources.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-11, which responds to comments related to biological resources, and MR-15, which responds to comments related to population growth and other public services.</p> <p>Section 4.12, Public Services and Recreation, provides an evaluation of the project's potential impacts to libraries. The project would be subject to payment of the City's growth mitigation fees as required by City Municipal Code Section 8-15 to provide funding for facilities as needed, which would offset the project's increased demand on public facilities. These fees provide for the funding of acquisition, design and construction of public facilities and related equipment necessary to serve new development within the City.</p> <p>Recently, approximately \$5 million has been set aside to acquire and retrofit a new site for the Orcutt Library to provide expanded library access to the community. These funds consist of \$2 million in federal funding, \$2 million in community donations, and roughly \$1 million from other sources including Santa Barbara County (Santa Maria Times 2022).</p>
DP 2-2	<p>The comment raises concern related to the proposed annexation of the project site and claims that the guidance of the Orcutt Community Plan (OCP) should be adhered to.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>

## 1.4.77 Chris Seymour

**From:** 23chris805  
**To:** Dana Eady  
**Subject:** FW: Orcutt annexation  
**Date:** Monday, January 30, 2023 5:05:08 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Sent from Samsung Galaxy smartphone.

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

From: 23chris805 <23chris805@gmail.com>  
Date: 1/30/23 4:59 PM (GMT-08:00)  
To: deady@cityofsantomaria.com  
Subject: Orcutt annexation

Good afternoon my name is Chris Seymour and I live off Union Valley Rd. I've been hearing alot about the proposed development in my area and I am very concerned.

We moved to Orcutt to get away from the congestion, noise and traffic in Santa Maria to raise our kids in what we believe is a safer area.

Should this development go through we believe it would undo all the good parts of the area we moved to. It would stress an already aquifer, as we are on well water. We are and have been under strick water restrictions. The list thing we need is more development, more development will run us out off water. Crime, traffic, noise and pollution will all rise.

We endured a substantial financial burden to provide our kids with a better place to live.

Please don't go through with the proposal.

Thank you

Sent from Samsung Galaxy smartphone.

CSe-1

### 1.4.77.1 Response to Letter from Chris Seymour

Comment No.	Response
CSe-1	<p>The comment raises concern related to water supply, traffic, noise, and police protection services.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-3, which responds to comments related to the transportation system, MR-6, which responds to comments related to water supply, and MR-12, which responds to comments related to noise. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>

## 1.4.78 Nancy Snyder

**From:** [Nancy Snyder](#)  
**To:** [Dana Eady](#); [bob.nelson@countyofsb.org](mailto:bob.nelson@countyofsb.org)  
**Subject:** Proposed Annexation at Union Valley Parkway  
**Date:** Monday, January 30, 2023 9:32:28 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

We are concerned! The amount of traffic it will bring to an already busy area, the amount of people and the impact on Patterson Rd. School and my biggest concern is water. We are already rationing our water and only able to water on certain designated days so how can this project be justified? We don't understand the thinking and certainly don't understand how the city of Santa Maria can annex land in the county.

We are opposed to this project!!!!!!

*Nancy Snyder*  
*(805)478-6517*

INS-1

INS-2

### 1.4.78.1 Response to Letter from Nancy Snyder

Comment No.	Response
NS-1	<p>The comment raises concern related to traffic, water supply, and the proposed annexation of the project site. Refer to MR-3, which responds to comments related to the transportation system, MR-6, which responds to comments related to water supply, and MR-8, which responds to comments related to annexation and economics. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
NS-2	<p>The comment is a conclusion to the letter, emphasizing the commenter's disapproval of the project. Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.79 Concerned Citizen

February 1, 2023

To Whom it May Concern,

I am vehemently opposed to this project as proposed. Our little town of Orcutt is disappearing each day through decisions made by the City of Santa Maria. We now have 4 storied building on the edge of the City and Orcutt over near Skyway and Waller Park, and a 5 storied senior housing complex on the border of Santa Maria and Orcutt (these are both under construction, both just as shocking when they started to go up). These new developments do not have appropriate buffers, are not visually pleasing, they are a single height for the entire development and do not get lower towards the edges to blend in with the surrounding area, they stick out like a sore thumb. These examples are located on City parcels, I don't understand placing high density in the middle of single-story housing: they tower, they change the feel, they block the hills – it's money grabs with very little thought for the areas they are being placed in. The concern is this proposed development would be much the same.

High density belongs downtown, near major transportation hubs, near already developed sources of shopping, grocery, and schools. I don't want a strip mall in my backyard with businesses that hop from one to the next, when a new one is built the old become vacant. The most recent development, Enos Ranch, is a travesty. No thought into building orientation, no thought into safe driveways in and out, no thought into a cohesive design – it's a hodgepodge of corporate design that will age faster than a kindergartener. It's all bad design.

I see Walmart is the property owner for the proposed development on Union Valley Parkway. Residents of Orcutt have been fighting a Walmart development for nearly 20 years. It seems the owner has now turned to the City to circumvent the wants of those who live here. I have not spoken to one local that is excited or happy that this is happening; I have however, seen people nearly in tears discussing it.

The Geotechnical Report in the EIR indicates that the report was run assuming one to three storied construction throughout, based on the site plan, I'm highly suspicious that this is not the case. Our local school district will be impacted, parks, roads, and our community as a whole.

The benefits listed in the EIR (taxes, housing goals, etc) do directly benefit the City, ironically, if the parcels are not annexed and it's developed through the County (as it should be), the County benefits. Housing element numbers, as identified in the EIR, indicate this helps the City meet its housing numbers... the County has numbers to meet as well.

This development, as shown, is NOT compatible with the existing area. The draft plans give no indication to design style nor intent. The site plans are varied and do not match each other, it seems intentionally deceiving. There are no landscaped buffers depicted between residential and commercial uses, the areas labeled as parks are little more than a green breezeway between large apartment buildings. There will be no sun, but I'm sure there will be plenty of wind. **Orcutt is overseen by the North County Board of Architectural Review (BAR). This is a prime intersection for our community and its design should be reviewed, and potentially improved, by the local BAR (should it unfortunately be approved).**

Sincerely,  
Concerned Citizen  
(Name Redacted)

CC-1

CC-2  
ICC-3

CC-4

CC-5

## 1.4.79.1 Response to Letter from Concerned Citizen

Comment No.	Response
CC-1	<p>This comment states opposition to the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>
CC-2	<p>The comment raises concern regarding the Geotechnical report prepared for the project.</p> <p>Refer to MR-18, which responds to comments related to the Geotechnical Report and geology and soils. As discussed in Section 4.6, Geology and Soils, all future development within the project site would be subject to the CBC, which requires buildings, building foundations, and any other associated structures to be constructed to withstand earthquake loads, including liquefaction. Future buildout of the project would also be required to comply with the building and design measures included in the Geotechnical Engineering Report and associated reports prepared by Earth Systems Pacific for the project, as detailed in Mitigation Measures GEO/mm-2.1, GEO/mm-2.2, GEO/mm-2.3, GEO/mm-3.1, GEO/mm-3.2, GEO/mm-3.3, GEO/mm-5.1, and GEO/mm-6.1. Mitigation Measure GEO/mm-6.1 has been identified to require the developer to retain a qualified Geotechnical Engineer to provide consultation during the design phase, to aid in future project design consistent with the Geotechnical Engineering Report, to review final plans once they are available, to interpret this report during construction, and to provide construction monitoring in the form of testing and observation. In addition, future buildout of the project would be required to comply with all applicable CBC standards, including Section 1613 of the CBC to reduce or avoid risk associated with development on potentially unstable soils, including liquefaction. The project would also be required to implement Mitigation Measure GEO/mm-2.3, which requires measures for building foundations to be implemented into future project design criteria to reduce the risk of collapse or other damage due to unstable geologic conditions.</p>
CC-3	<p>The comment raises concern related to public schools, parks and recreation, and roads.</p> <p>Refer to MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to the transportation system, and MR-7, which responds to comments related to parks and recreation.</p>
CC-4	<p>The comment raises concern related to taxes and achieving the County's RHNA goals.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
CC-5	<p>The comment raises concern related to visual impacts, parks, and land use consistency.</p> <p>Refer to MR-7, which responds to comments related to recreation and open space, MR-10, which responds to comments related to aesthetic resources, and MR-17, which responds to comments related to land use consistency.</p> <p>Additionally, as shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Park and open space areas within the project site would be considered as part of the overall project development and would not result in physical impacts on the environment outside of those described in this EIR. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system. Potential environmental impacts associated with the provision of public park facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p>



## 1.4.80 Tim Rogers

**From:** [Tim Rogers](#)  
**To:** [Dana Eady](#)  
**Subject:** \*\* Potential Spam \*\* Richards Ranch  
**Date:** Friday, February 3, 2023 2:13:27 PM  
**Attachments:** image001.jpg

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hi Dana,

I hope you are well. Thanks again for setting up that informative meeting a couple weeks back.

It has been brought to my attention that there is a pair of foxes that live on the Richard's Ranch site. I was provided videos and photos of one of the foxes yesterday. Do you know if the fact that there are foxes calling this area home was taken into account with the EIR? I am curious how to best share this information/photos.

I'll include this in my EIR comments as well, but wanted to pass on to see if this was already a known.

Thank You,

Tim Rogers  
Rogers & Pedersen Construction, Inc.  
Office: (805) 354-5400  
Mobile: (805) 354-3658  
[www.rp-construction.com](http://www.rp-construction.com)  
 [Follow us on Instagram](#)

TR 1-1

**From:** [Tim Rogers](#)  
**To:** [Dana Eady](#)  
**Subject:** Richard's Ranch EIR Comments  
**Date:** Monday, March 6, 2023 11:59:59 PM  
**Attachments:** [Habitat Removal Images.pdf](#)  
[Fox.jpg](#)

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

My name is Tim Rogers and I oppose the proposed annexation of this property and oppose this development in its current form. The Traffic study and the biology report are inherently flawed. This is a great piece of property that is central to the Orcutt Community Plan and should be developed within the confines of the Orcutt Community Plan within the County of Santa Barbara. The Richard's Ranch project is the wrong project on the wrong site. Please see my issues below with the project EIR and the project in general.

#### **Traffic - Number of Cars & Trips**

In public forum meetings, the developers noted that these apartments will be 'higher end' for a more 'affluent demographic' and therefore have allocated TWO parking spaces per apartment—for a total of 800 parking spaces/vehicles. The townhomes have garages for two vehicles and also extra deep driveways to allow for additional off street parking of two cars. This would equate to 380 vehicles. Though not all apartments will have two vehicles—some of the three bedroom units may have three vehicles—the study should be performed for the worst case scenario—which is what an EIR is supposed to do. So we are talking about parking for 1,180 vehicles.

If one reviews the Table 3 Project Trip Generation numbers for the apartments and the condos, it states that combined, there is a max peak generation of 182 morning trips and 239 evening trips. This is FLAWED. Out of 1,180 vehicles there is no way that max peak trips for morning and evening will equate to 182 and 239 respectively. The rates are underestimated as they are using a standardized rate from ITE Code 220 for low rise multi-family residential—which includes low income multifamily residential—its using an apples number for an oranges scenario. Remember—these are higher end, affluent apartments—the developer themselves are planning on providing TWO parking spots per apartment being that these apartment owners will be higher income and will be able to afford two cars. The peak trips generated by these apartments and condos will be MUCH higher than this traffic plan indicates. For example, if 70% of the folks in the apartments either have to leave for work or drop children off at school between the hours of 7am and 9am—that would equate to 826 trips between 7am and 9am—or a peak trip count of 413—which dwarfs the 182 shown in the study. This study is flawed and needs to be reevaluated using actual vehicle numbers projected for the apartments and condos, not just arbitrary numbers from an ITE table.

#### **Traffic – UVP and Orcutt Road**

Table 8 of the traffic study indicates that the project will change the rating of the UVP/Orcutt

TR 2-1

Road intersection from it's current A rating to a C rating during the morning. This is unacceptable—why would the community allow a project that downgrades the traffic intersection so severely?

**Traffic – UVP and Hummel**

Comparing the number of trips East and West on UVP at Hummel, the existing condition has peak trips at 828/633 from the west and 638/559 from the east. With this project, those increase to 913/753 from the west and 742/658 from the east. This report is terribly flawed. Only looking at the residential uses of this project and ignoring the whole commercial aspect, this report It is stating that with the addition of 1,180 cars and their drivers at the apartments and condos—that the peak traffic rate on UVP at Hummel will only increase by no more than 100 peak hour vehicle trips. Where do they think all of these vehicles are going? They are not allocating the right amount of vehicles and trips to UVP at Hummel.

Now add in all of the additional trips to the commercial establishments in this proposed project and it really blows this traffic study up.

Page 17 of the traffic report states 'distribution pattern developed for the Project is based on existing traffic counts as well as as general knowledge of the population, employment, and commercial centers in the Santa Maria area.' Much of this traffic study is SUBJECTIVE and not based on fact. This is wrong. We need facts. This EIR should be based on WORST CASE SCENARIO—not the rosie picture being painted by potentially biased individuals with subjective opinions.

**Traffic – UVP**

This project shouldn't even be considered until UVP is widened to four lanes from 135 all the way to the 101. By introducing over a thousand new vehicles at this project site, the bumper to bumper traffic that exists during peak hours on the two lane UVP between the 135 and the 101 is going to be devastating. The developer has noted that they would widen UVP to four lanes along the frontage of their property—but all that will do is force the bottleneck in the lanes just to the east of their property. UVP needs to be widened to four lanes all the way through before a project like this can be considered.

**Traffic – Entry into Shopping Center**

The primary entrance into the shopping center from the east will be to take a left turn on Orcutt Road since there will be no left turn lane that will allow a direct left turn off of UVP. What this will cause is a massive backup of traffic on UVP that wants to turn left onto Orcutt Road to access the shopping center. This backup of traffic can and will extend to the 135 and cause issues. I understand that the traffic study attempts to try and quantify 'queues' of vehicles—but based on what I have seen living here for 10 years—it is already a problem at some times of the day—WITHOUT this development.

TR 2-1  
(cont'd)

**Traffic – Line of Sight at Orcutt Road**

The line of site for vehicles traveling along the north side of Orcutt Road, south of UVP is already challenging. Introducing two driveways for the Parcel 3 fast food restaurants will make this dangerous as the line of site along that curve is very hard to see as is, without people trying to rush in and out of driveways. Further, the driveway entering Parcel 4 from Orcutt Road (just north of the church parking lot) will offer the same issue. It is hard enough pulling out of the church parking lot and seeing to the south and north as it is—it would be even more difficult at the new road for the proposed development.

**Traffic – Accidents at UVP and Hummel**

Page 45 of the traffic study indicates there have only been five accidents in the past three years at this intersection. This is just false. We likely have more than five accidents a year—ranging from fender benders to severe accidents. It would be more accurate to note this as REPORTED ACCIDENTS. As we all know, unless an injury has occurred, most accidents nowadays don't even involve a police report. The accident study is MISLEADING—and should not only include the reported accidents (as they have done) but a factor to account for all unreported, minor accidents—of which the Hummel/UVP intersection is known for. Five accidents over the past three years is completely inaccurate.

**Traffic – Study Didn't Include Mooncrest**

The traffic study did not include any study of traffic on Mooncrest—this is a major flaw in the study. I would request that the traffic study be re-done to include studying the major traffic impact on Mooncrest. Many people will use Mooncrest as a shortcut between Hummel and Orcutt Road in order to bypass the new project and UVP. Folks living in the apartment complex and dropping their kids off at Patterson School will often use Mooncrest. Mooncrest will be significantly impacted by the traffic of this project and to ignore that fact is not right. Mooncrest already suffers from traffic and a lot of speeding—this project will greatly exacerbate the problem, making this road further unsafe for pedestrians and children.

**Access – Dancer closed to car and foot traffic**

The traffic report and EIR does not address Dancer Ave. Dancer needs to be closed off for all vehicle and pedestrian traffic. We will have a massive traffic issue if Dancer is open to access for vehicles to get to Mooncrest (again, Mooncrest was not included in the study). If Dancer remains open to pedestrian traffic, we will have an issue with residents of the development parking along Mooncrest and walking to the development via Dancer. The easy way to mitigate this is to ensure Dancer remains closed and walled off to vehicle and pedestrian access.

**Traffic – VMT**

Reading through the VMT section of the traffic study (starting on page 48), the section is very subjective. It states that the City of Santa Maria would not provide their VMT calculator to the

TR 2-1  
(cont'd)

traffic consultant—so much of the VMT study is based on (subjective) assumption. Page 49 states that “The ITE mixed-use traffic model shows that up to 40% of the trips generated by the residential component of the Project would be internal to the site. To be conservative, the traffic study assumes that 25% of the Project-generated trips are internal.” This again is FLAWED! An EIR is supposed to study the worst case scenario impact to the environment. Assuming that 25% of the trips will be people driving across the street to get groceries is wishful thinking. In my opinion of all trips generated, very few, only a few percentage points, of trips would be internal. The logic for this is that the residential use is so close in proximity that you would more quickly be able to WALK across the street than drive. Thus only a few percent of the project generated trips should be considered internal—NOT 25%! Again—this portion of the report is subjective—not factual. The traffic report should be revised to include less than 5% calculation of internal trips—that is the worst case scenario and the EIR should reflect this.

TR 2-1  
(cont'd)

#### **Emergency and City Services**

Annexing this parcel into the city would create an ‘island’ of services for the City of Santa Maria. How will the city provide services to this development? Sure it is capable—but what is the environmental impact of the city serving an ‘island’ like this with their existing facilities? I did not see this studied in the EIR.

#### **Abuse of Orcutt Resources**

The people living in this development’s apartments and townhomes will use Orcutt’s resources and infrastructure more so than Santa Maria’s— schools, law enforcement, fire, rescue, parks, recreation, trails and roadways will all be overwhelmed at the expense of Orcutt citizens—yet Orcutt citizens will have no say in this project if annexed into the county. Classic case of taxation without representation. Our limited medical facilities will be further burdened with the additional 1,000+ individuals. How is this development going to IMPROVE and BUILD on Orcutt’s public facilities and infrastructure—rather than just take advantage of it?

TR 2-2

#### **Neighborhood Compatibility**

This project is not compatible with the surrounding neighborhoods. Look at a satellite view and look what is within a half mile radius. This is an area dominated by single family homes—which is what should be put here. I am not opposed to responsible commercial development—but adding more ‘fast food’ to our community is not what is needed—especially for a country, state and city that suffers from major obesity issues.

TR 2-3

#### **‘Stealing’ Key Site in Orcutt Community Plan**

This parcel is Key Site 26 in the Orcutt Community Plan. Orcutt is a large community—larger than many of the incorporated cities of Santa Barbara County. We have aspirations to incorporate one day and we can’t allow our key real estate to be ‘given’ to the city. This site is

TR 2-4

vital to the Orcutt Community Plan. The plan was created in a way that all of the key sites are interdependent on each other—all of them are necessary for the Community Plan. If there is an alteration—that needs to be done by the Orcutt Community—not by a hostile takeover from a city that offers very little to the community. Removing this site from the Orcutt Community Plan means that the Orcutt Community Plan needs to be revised—and what are the environmental implications of a revised Orcutt Community Plan?

TR 2-4  
(cont'd)

#### **Not Improving Community You are Taking From**

This plan does NOTHING for the community of Orcutt. This developer is proposing to take Orcutt land and give it to the city—giving Orcutt nothing in return (minus some insignificant tax revenue share). This development doesn't have any public spaces—no public benefit—no park, no walking paths through the tree groves, no open spaces—nothing. I would like to see the developer make an effort to provide greenspace available to the public, especially for a such a large development. How is this lack of public greenspace not reflected negatively in the EIR? It seems that every development of this scale that occurs nowadays has a public greenspace element to it.

TR 2-5

#### **Monarch Butterflies**

The biology report notes that the Xerces counts of butterflies declined between the late 1990s and 2019. But in 2021 and 2022 the numbers jumped back up to 28 and 34 roosting Monarchs. As many of us know living on the central coast, monarchs have been on the decline over the past couple decades—which is why it is as important as ever to maintain known roost/breeding sites. Just because there has been a decline—doesn't mean they won't come back. There are NUMEROUS examples of animals/insects rebounding back after years of decline. Looking just north to the Pismo Monarch Butterfly site—in the late 1990s there were over 100,000 monarch's counted (115,000 in 1998) on the site. That number declined precipitously all the way through 2018, 2019 and 2020—all the way down to just a few hundred counted. This was a 99.7% decrease. In only a matter of a few years—that number skyrocketed back up to over 24,000 this past year—an increase of over 6900% in a matter of a few years. The very same situation could happen to the roosting site at the proposed property. We can't just continue to remove trees and reduce habitat.

TR 2-6

This project should be developed responsibly, keeping these important roost trees in tact—for the monarch butterflies to come back to—and for all of the other birds and animals to enjoy. The site is plenty big for responsible development, while maintaining these important stands of trees.

#### **Other Wildlife**

One thing that was missing from the biology report is the pair of foxes that live on this parcel that several of the neighbors have photographed. Attached is photo screengrab from a video I have of one of the foxes that was taken from the church parking lot. I saw no mention of these

TR 2-7

foxes in the biology report. This is of great concern—not only for the fox—but if the biologist that performed this report couldn't find two foxes on a 40 acre parcel that is largely wide open—what else did they miss? How much time did they spend on site? Again—just very concerned that if they couldn't see two dog sized animals—what kind of flora, reptile, amphibian and bird species did they miss? The biologist noted that 'very little small mammal use was observed'—and not enough to support a badger. BUT—there is obviously enough of a small mammal population to support two foxes? This is somewhat contradicting. In my opinion, a second report, by a different biologist should be performed.

#### **Habitat Removal**

There was significant coastal chaparral/scrub removal between February 2022 and March 2022. I recall seeing tractors on the site during this time and it is easily illustrated via satellite imagery that the developer went in and removed large areas of native plants. The biology report incorrectly notes that these areas were previously removed—prior to 2022. This is incorrect and easily proven with satellite imagery. Further, they noted that the coastal chaparral/scrub on the north side was removed to 'discourage homeless encampments'. Is this just subjective opinion by the biologist or did the developer get a permit to remove these habitat? The areas of scrub/chaparral on the north side that were removed were in the wide open—the scrub wasn't taller than waist high—there were no homeless camps—nor would such sparse and low shrubbery ever have attracted homeless camps.

The timing of removal of this brush is very suspicious—it was removed JUST before an EIR was performed on this proposed development. The biologist states that they visited the site on 12/17/21, 1/5/22, 3/7/22 and 4/27/22. All of the brush on the attached imagery was removed between February 2022 and March 2022—How did the biologist miss this in their report? The habitat would have been there for their first two visits—then it would have been gone for the second two visits? Is this an oversight or was this purposefully left out of the report? How come he didn't mention that the habitat was removed between his visits?

Thank You,  
Tim Rogers

TR 2-7  
(cont'd)





TR 2-7  
(cont'd)





TR 2-7  
(cont'd)



TR 2-7  
(cont'd)



### 1.4.80.1 Response to Letter from Tim Rogers

Comment No.	Response
TR 1-1	<p>The comment raises concern related to wildlife that utilize the project site, specifically foxes.</p> <p>Refer to MR-11, which responds to comments related to biological resources. As discussed in Section 4.3 of the PRDEIR and this Final EIR, a significant impact related to biological resources would occur if the proposed project would result in the temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species. Special-status species include those that have been designated as rare, threatened, or endangered, as well as those which are candidate species for listing. Section 4.3.1.6 Special-Status Plant Species and 4.3.1.7 Special-Status Wildlife Species discuss these designations in more detail. Based on the special-status species assessment, it was determined that three special-status wildlife species (monarch butterfly, northern California legless lizard, and western red bat) and nesting migratory birds and raptors could potentially occur on the project site (DWE 2022). Other common species are known to use the project site; however, the project site is generally surrounded by urban residences and the SR 135 corridor. As such, it has been concluded that minimal quality habitat for locally common wildlife species, including foxes; as such, impacts to foxes would not be considered significant.</p>
TR 2-1	<p>The comment raises concern related to the transportation system within the project area, traffic congestion and safety, the annexation of the site, land use consistency, and parking.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only.</p> <p>Additionally, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p> <p>Refer also MR-8, which responds to comments related to annexation and economics, and MR-17, which responds to comments related to land use consistency.</p>
TR 2-2	<p>The comment raises concern related to emergency services, schools, parks and recreation, and other public services. The comment also claims that the project would result in a municipal island.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-7, which responds to comments related to parks and recreation, MR-8, which responds to comments related to annexation and economics and MR-15, which responds to comments related to population growth and other public services. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p>
TR 2-3	<p>The comment states that the project is not compatible with the surrounding neighborhood. Refer to MR-17, which responds to comments related to land use consistency.</p>
TR 2-4	<p>The comment raises concern related to the proposed annexation of the project site and compliance with the Orcutt Community Plan (OCP).</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>

Comment No.	Response
TR 2-5	<p>The comment raises concern related to recreation and the reduction of open green space in the area.</p> <p>Refer to MR-7, which responds to comments related to recreation and open space. As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. It is also not possible to provide details regarding possible walking trails or paths within the development. However, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p> <p>Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
TR 2-6	<p>The comment raises concern related to monarch butterflies. Refer to MR-11, which responds to comments related to biological resources.</p>
TR 2-7	<p>The comment raises concern related to wildlife that utilize the project site and associated habitat, including foxes.</p> <p>Refer to MR-11, which responds to comments related to biological resources. As discussed in Section 4.3 of the PRDEIR and this Final EIR, a significant impact related to biological resources would occur if the proposed project would result in the temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species. Special-status species include those that have been designated as rare, threatened, or endangered, as well as those which are candidate species for listing. Section 4.3.1.6 Special-Status Plant Species and 4.3.1.7 Special-Status Wildlife Species discuss these designations in more detail. Based on the special-status species assessment, it was determined that three special-status wildlife species (monarch butterfly, northern California legless lizard, and western red bat) and nesting migratory birds and raptors could potentially occur on the project site (DWE 2022). Other common species are known to use the project site; however, the project site is generally surrounded by urban residences and the SR 135 corridor. As such, it has been concluded that minimal quality habitat for locally common wildlife species, including foxes; as such, impacts to foxes would not be considered significant.</p>

## 1.4.81 Heather Reese

Heather Reese  
1225 Woodmere Road  
Santa Maria, CA 93455  
805 714-1409  
[heather@thereeses.us](mailto:heather@thereeses.us)

February 4, 2023

Ms. Dana Eady  
Planning Division Manager  
City of Santa Maria  
Community Development Department  
110 South Pine Street  
Santa Maria, CA 93458

Ms. Eady,

I am an Orcutt area resident writing in opposition to the Richards Ranch Annexation Project (Orcutt Key Site 26). I feel that the scale of the proposal is too much. I do not want to see the area annexed; I much prefer development in line with what is in the existing Orcutt Community Plan guidelines for Key Site 26.

HR-1

I know that the state of California has mandated more housing and I appreciate the need. However, I would hope the developer could work with the County to come up with plans that have less density, use less water and bring in less traffic. The traffic and accident rates on Union Valley Parkway, the 135, Bradley and all associated areas are increasing all the time. We do not need a huge development right in the middle of that.

HR-2

Thank you for your consideration. I would appreciate you sharing this with the proper shareholders.

Best regards,

Heather Reese

### 1.4.81.1 Response to Letter from Heather Reese

Comment No.	Response
HR-1	<p>The comment raises concern related to annexation, the size of the project, and land use consistency.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
HR-2	<p>The comment raises concerns related to traffic congestion and safety, water supply, and population growth.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p> <p>Refer also to MR-15, which responds to comments related to population growth and other public services.</p>

## 1.4.82 Myrna Heldfond

**From:** [Myrna Heldfond](#)  
**To:** [Bob.Nelson@countyofsb.org](mailto:Bob.Nelson@countyofsb.org)  
**Cc:** [Dana Eady](#)  
**Subject:** Richards Ranch annexation  
**Date:** Wednesday, February 8, 2023 1:46:50 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Supervisor Nelson,

If you have a conscience, if you care about Orcutt, if you care about your constituents, if you care about the environment and our quality of living then you must do all you can that is in your power to keep the Richards Ranch project from happening. It is especially important to keep the city of Santa Maria from annexing any part of Orcutt. Santa Maria has demonstrated what it can do by what it has built in the way of Enos Ranch. It is one of the ugliest projects I have ever seen and a recipe for ultimate disaster. If they want to build housing maybe the empty Costco property would be a way to start.

The requested 16 acres for commercial use is especially disturbing. Do we really need another gas station/mini-mart, chicken restaurant drive-thru or Aldi? I would think not.

Let us fight the Richards Ranch project successfully and, perhaps, send a message to the airport board. They are preparing an even greater disaster for the strawberry fields at Union Valley and Hwy. 135.

Myrna Heldfond  
Orcutt

MHe-1

### 1.4.82.1 Response to Letter from Myrna Heldfond

Comment No.	Response
MHe-1	<p>The comment raises concern regarding annexation and suggests a different location for the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>



## 1.4.83 Stephen Teague

**From:** [stephen.teague](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch EIR Report  
**Date:** Sunday, February 12, 2023 4:13:02 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hi, my name is Stephen Teague and I attended the Richards Ranch EIR Meeting at the S.M. Library Learning Center.

I did look at EIR that was posted on the City Web Site and found it a little overwhelming. I believe it was over 1700 pages which doesn't make it very user friendly. These are my concerns:

1. I believe that the traffic would have a greater impact on the area than was stated. If there are 500 new residential units constructed that would mean at least 1,000 cars if there are only 2 cars per household ( and that's probably a conservative figure.)  
By the way, that is more cars that are on the lots of Santa Maria Ford, Honda, and Toyota combined as of 2/12/23. I just don't see how that this cannot have a Significant impact on the Environment. That doesn't take into account the traffic of the other proposed developments.
2. The area they want to develop has several large mature trees that are home to Red Tail Hawks, Great Horned Owls, Monarch Butterflies, and several other species of birds and animals that call those large trees home.
3. The traffic at Union Valley and Highway 135 is already terrible in the mornings and evenings. I have seen the traffic at 8:00 am on weekdays backed up from Orcutt Road and Union Valley Parkway into Highway 135. Just imagine the traffic nightmare with over 1,000 new residents living there.
4. With the recent flooding at Union Valley and Bradley Intersection I wonder if they have adequately addressed the runoff that you get when you pave 40 Acres?

My conclusion is that the density of this proposed project does not fit the surrounding environment. We all know that more housing is needed in the Santa Maria Valley but the surrounding communities and environment need to be taken into consideration as well. I have owned and lived in my house on Dancer Ave for 34 years. I have seen plenty of new housing developments over the years and I am not opposed to new construction. The surrounding community and environment need to be taken into consideration when large construction projects like this are being considered.

SDT-1

SDT-2

SDT-3

SDT-4

SDT-5

### 1.4.83.1 Response to Letter from Stephen Teague

Comment No.	Response
SDT-1	<p>The comment raises concern related to traffic and parking.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
SDT-2	<p>The comment raises concern related to wildlife that utilize the project. Refer to MR-11, which responds to comments related to biological resources, including those related to the monarch butterfly.</p>
SDT-3	<p>The comment raises concern related to traffic. Refer to MR-3, which responds to comments related to traffic and transportation.</p>
SDT-4	<p>The comment raises concern related to stormwater runoff. Refer to MR-16, which responds to comments related to hydrology. With required adherence to the California Building Codes and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with off-site flooding.</p>
SDT-5	<p>The comment states that the project is not compatible with the surrounding neighborhood.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>

## 1.4.84 Cliff Solomon

**From:** [Cliff Solomon](#)  
**To:** [Dana Eady](#)  
**Subject:** Richard's Ranch Annexation  
**Date:** Friday, February 24, 2023 10:47:07 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Richards Ranch Annexation

I'd like to comment on the proposed annexation of the Richards Ranch by the city of Santa Maria. Although I am not against a controlled development of the area, I firmly believe that the land needs to continue to be in county control rather than city.

I live near the proposed development and have been following this project closely. I know that we are in a very preliminary stage in the process, but wanted to list several of my concerns.

- If this land is annexed by the city, we Orcutt residents would lose control of an area that impacts our daily lives and commutes. It reminds me of the old adage "Taxation Without Representation"
- I am worried about how the work will impact the current nature environment. There are monarch butterflies, great horned owls, and other animals who live in the woods. If the eucalyptus trees in the area are cut down, it will destroy the current habitat.
- We must control the building of fast-food restaurants on the triangular areas formed by the borders of Orcutt Road and 135. Any new restaurants would greatly impact the traffic patterns of that area, an area that already has significant problems. Plus, these lots are not big enough for any buildings and necessary parking.
- I am also concerned about the building density of the project. Traffic in that area is already a nightmare at times and the proposed density will only increase the problems. Yes, we need to build additional housing (as the state demands), but it must be carefully monitored and changes to the traffic infrastructure must be modified to meet the increased need.

I plan on tuning in to the LAFCO meeting next week to hear of what that organization has to say on the matter.

Thank you.

Cliff Solomon  
[cliff\\_solomon@msn.com](mailto:cliff_solomon@msn.com)  
(805) 266-0518

CSO-1

CSO-2

CSO-3

### 1.4.84.1 Response to Letter from Cliff Solomon

Comment No.	Response
CSo-1	<p>The comment raises concern related to taxes and the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
CSo-2	<p>The comment raises concern related to wildlife that utilize the project. Refer to MR-11, which responds to comments related to biological resources, including those related to the monarch butterfly.</p>
CSo-3	<p>The comment raises concern related to transportation infrastructure and population growth. Refer to MR-3, which responds to comments related to traffic and transportation, and MR-15, which responds to comments related to population growth and other public services.</p>

## 1.4.85 Laurie Haro

**From:** Laurie HARO  
**To:** Dana Eady; bob.nelson@countysantabarbara.org  
**Subject:** Concern over the Annex at HWY 135 and Union Valley Parkway  
**Date:** Saturday, February 25, 2023 12:59:14 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Good Afternoon,

I am writing to express my concern over this proposed annex. Why additional "affordable" housing or any housing and businesses needs to be added to an area that is home to birds and wildlife, as well as aesthetically pleasing needs to be ruined is beyond me. I moved from SM to what is deemed Orcutt approximately 20 years ago due to its dedication towards keeping a small community that was mostly residential. The City of SM has shown a lack of thorough planning with its community. Businesses continue to fail while new business areas are built. The mall is mostly empty. Murders occur almost every weekend. The addition of a new community that will be supported by SMPD and a very small Sheriff Deputy crew is concerning. The amount of traffic that goes through this area is already heavy at times, and now it will be added too. The City of Santa Maria has been pushing to come into this area and ruin it for years, and now it looks like they will be successful. We need distinct areas in North Santa Barbara County- residential and a business side. Adding drive through restaurants, shopping, apartments etc. in the middle of a residential area is so disappointing and further demonstration of a lack of planning while supporting taxes for the few. We can't even get decent roads, sidewalks, lighting etc. in this area, but lets add about another slew of new residents.

Unreal.

Laurie Haro

LH-1

### **1.4.85.1    Response to Letter from Laurie Haro**

---

<b>Comment No.</b>	<b>Response</b>
LH-1	The comment raises concern related to public services, transportation, population growth, and other utilities. Refer to MR-1, which responds to comments related to emergency services, MR-3, which responds to comments related to traffic and transportation, MR-14, which responds to comments related to utilities, and MR-15, which responds to comments related to population growth and other public services.

---

## 1.4.86 Kenneth McCalip

**From:** [Kenneth McCalip](#)  
**To:** [Dana Eady](#)  
**Subject:** Comments on annexation project KENNETH MCCALIP  
**Date:** Saturday, February 25, 2023 1:45:53 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

City of Santa Maria:

I hope your listening to these comments. I live at 878 Brookside Ave. The back of our yard is abutting Union Valley Parkway. Thus we are forced to listen to loud traffic sounds day and night. We do not want to hear traffic increase by 20,780 trips per day as it is already too loud to live with. Righetti High School is at 145 percent of capacity and does not need additional students. When students are going to and from school, we now have difficulty pulling out of our neighborhood on to Foster Road.

The need for water is not a good reason to avoid the Orcutt Community Plan requirements which would not allow this development. This area has long been part of the Orcutt area and not Santa Maria.

We love the peace and quiet of the Orcutt area. Santa Maria stay away!!!!

Yours truly,

KENNETH MCCAIP  
878 Brookside Ave.  
Santa Maria, CA 93455

kennethmccalip@yahoo.com  
805 937 5849

KMC-1

KMC-2

KMC-3

### 1.4.86.1 Response to Letter from Kenneth McCalip

Comment No.	Response
KMC-1	The comment raises concern related to an increase in traffic and noise. Refer to MR-3, which responds to comments related to traffic and transportation and MR-12, which responds to comments related to noise.
KMC-2	The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments related to public school facilities.
KMC-3	<p>The comment raises concern related to water supply and compliance with the OCP.</p> <p>Refer to MR-6, which responds to comments related to water supply, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p> <p>The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits.</p> <p>With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>



## 1.4.87 Michael Edberg

**From:** [MICHAEL EDBERG](#)  
**To:** [Dana Eady; bob.nelson@countyofsanbarbara.org](#)  
**Subject:** Annexation at Hwy 135 & UVP  
**Date:** Sunday, February 26, 2023 9:45:37 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Madam & Sirs,

As a resident of the Orcutt area for over 36 years I can confidently say that the vast majority of Orcutt and I doesn't want an extension, I think a better word is intrusion, into our area by the city of Santa Maria.

Leave Orcutt alone, we like it just the way it is. Please focus your efforts on improving Santa Maria, because we know it needs it more than Orcutt.

I truly believe that you will be making a big mistake if you try to go forward with this, thanks in advance for your consideration.

Michal Edberg

MEd-1

### **1.4.87.1    Response to Letter from Michael Edberg**

---

<b>Comment No.</b>	<b>Response</b>
MEd-1	This comment states opposition to the project. Refer to MR-5, which responds to non-substantive comments.

---

## 1.4.88 Susan Ferrant

**From:** Susan Ferrant  
**To:** Dana Eady; bob.nelson@countyofsanjose.org  
**Subject:** Annexation of Orcutt  
**Date:** Monday, February 27, 2023 11:12:34 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To whom it may concern:

Please consider my concerns about the annexation of part of Orcutt for increased home development in the area of Highway 135 and Union Valley Parkway.

I recently purchase a home in Orcutt in a planned community. I wanted to escape the crowded roads, noise, neighborhoods and public facilities in Santa Barbara.

Now it appears that a plan for Orcutt will create exactly what I wanted to escape.

Do any of the developers live in Orcutt or travel the roads in Orcutt or have children in Orcutt schools? Do any of the developers enjoy the quiet in this community? I doubt it because this project will destroy what makes this community worth living in.

I laughed when I read that the community plan, "adopted to provide county guidance" for Orcutt development "would not apply." Sounds really smart—agree on a plan for development and then dismiss it so the agree-upon interests of the community can be ignored.

Please stop this project! We do not need the traffic, noise, and crowding of Orcutt so that some developers and the city can make money. The Orcutt quality of life should be respected and preserved.

So-called progress is not always a good thing.

Susan Ferrant

Sent from my iPhone

SF-1

### **1.4.88.1 Response to Letter from Susan Ferrant**

---

<b>Comment No.</b>	<b>Response</b>
SF-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, pollution and compliance with the OCP.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, MR-13, which responds to comments related to pollution, and MR-17, which responds to comments related to land use. It should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>Additionally, it should be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>

---

## 1.4.89 Kathryn Jacobson and Paul Cooke

**From:** [kathryn.jacobson](#)  
**To:** [Dana Eady](#)  
**Subject:** 135 and Union  
**Date:** Monday, February 27, 2023 11:13:14 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear City of Santa Maria

I am a resident of Orcutt living very close to the junction of 135 and Union. I strongly oppose this development plan. The traffic will be unbelievable. Its already a wait there, a normal wait. To add anything to the congestion and put that many buildings and people in such a small area will change the tone of why so many of us moved here. Four hundred!!! apartments and 95! townhomes! - these are numbers that are unimaginable for this corner. Ruinous. Unhealthy. I can't be at the meeting in Santa Barbara Thursday but why make it an hour away causing so many upset residents to not be able to attend? Everyone I know is in shock about this and wondering what can be done to stop it. Please let me know what I can do to tone this development way way down. I don't know where to turn.

Sincerely, Kathryn Jacobson and Paul Cooke  
4417 Countrywood Dr, Orcutt

KJPC-1

### **1.4.89.1     *Response to Letter from Kathryn Jacobson and Paul Cooke***

---

<b>Comment No.</b>	<b>Response</b>
KJPC-1	This comment states opposition to the project. Refer to MR-5, which responds to non-substantive comments.

---

## 1.4.90 TJ

**From:** TJ  
**To:** Dana Eady; lafco@sblafco.org  
**Subject:** Orcutt Petition for Annexation  
**Date:** Monday, February 27, 2023 9:05:11 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello,

In case you weren't aware, some of the Orcutt residents are signing a petition against the Richards Ranch Annexation and Project.

Here is the link to the petition: <https://chnng.it/PcZHCDhQQy>

I am a lifetime Orcutt resident. I am against the project mainly because of the un-safe nature of the UVP & 135 intersection and lack of services for our area. The UVP & 135 intersection has had numerous major and deadly accidents since it was established. It is well known by residents as an unsafe intersection. With an additional 1800+ residents that would move into the area, there will certainly be more accidents. Also more drivers on the road in that area would cause havoc on the frontage road especially at the Foster Road and Orcutt Road intersection. The EIR does not address historical traffic accidents at the intersection of UVP & 135 or propose how safety might change with a higher population in that area. There needs to be a study on the safety of the intersection and surrounding intersections, not just the UVP & Hummel intersection, as noted in the EIR.

Righetti High School and Orcutt Union School District are already overcrowded and some schools are at maximum capacity and can't sustain another influx in the population. There also should be a study on the current school enrollment and capacities, and how this project would affect it.

The City of Santa Maria has areas better suited to this type of development, including vacant storefronts. The City should re-evaluate existing areas and zoning rather than expanding into the community of Orcutt, anymore than they already have.

The Orcutt area will undoubtedly continue to grow, but annexing this property to the City of Santa Maria for high density housing, is not the right answer. This is not what is best for the Orcutt community.

Thank you for your consideration.

TJ

Orcutt Resident

TJ-1

TJ-2

TJ-3

### 1.4.90.1 Response to Letter from TJ

Comment No.	Response
TJ-1	<p>The comment raises concern related to traffic congestion and safety.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
TJ-2	<p>The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments related to public school facilities.</p>
TJ-3	<p>The comment raises concern regarding annexation and suggests a different location for the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>



## 1.4.91 Mary and Robert Perry

**From:** [Robert Perry](#)  
**To:** [Dana Eady](#); [Nelson, Bob](#)  
**Subject:** Proposed annexation at Union Valley Parkway  
**Date:** Tuesday, February 28, 2023 1:13:52 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Ms. Eady and Supervisor Nelson,

We are writing to express our opposition to the proposed annexation of the Union Valley Parkway (UVP) property. We have been following the development of this plan, and feel that it is problematic in many aspects. We are very concerned with the projected increase in traffic. After the extension of UVP to Hwy 101, the traffic on that street has become heavy and consistent throughout the day. We have changed our driving patterns specifically to avoid turning left onto UVP from Hummel Drive due to the dangerous speeds at which many motorists drive on that stretch of road and the difficulty in finding a break in the traffic. The addition of a signal at that intersection will help, but we feel that it will still be a dangerous intersection, particularly for pedestrians and schoolchildren.

MRP-1

We are concerned about the removal of open space, specifically the Eucalyptus trees that provide habitat for Monarch butterflies. The recent rains have also demonstrated the need for open space to capture water, as opposed to more concrete and asphalt that allows water to run off and increase the potential to flood.

MRP-2

The impact on local schools, particularly Righetti High School which is already over-enrolled, is difficult to defend.

IMRP-3

Certainly, the question of where the water will come from to support this development is of utmost importance. The fact that the developer needs to go through the city of Santa Maria in order to apply for supplemental water should be a major red flag against the advisability and prudence of approving this development.

MRP-4

Lastly, we feel that this annexation would set a dangerous precedent for the City to annex other desirable parcels for development, even though they are well outside the established city limits.

MRP-5

Thank you for your time and the opportunity to express our opposition to this proposed annexation and subsequent development.

Respectfully,

Mary and Robert Perry  
4904 Cherry Ave.  
Santa Maria, CA 93455  
805-934-9643

### 1.4.91.1 Response to Letter from Mary and Robert Perry

Comment No.	Response
MRP-1	The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to traffic and transportation.
MRP-2	<p>The comment raises concern related to biological resources and open space.</p> <p>Refer to MR-7, which responds to comments related to recreation and open space and MR-11, which responds to comments related to biological resources, including those related to the monarch butterfly.</p> <p>Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
MRP-3	The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments related to public school facilities.
MRP-4	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
MRP-5	The comment raises concern related to the proposed annexation of the project site. Refer to MR-8, which responds to comment related to annexation and economics.

## 1.4.92 Shirley Randall

**From:** [Shirley Randall](#)  
**To:** [bob.nelson@countyofsanbarbara.org](mailto:bob.nelson@countyofsanbarbara.org)  
**Cc:** [Dana Eady](#)  
**Date:** Tuesday, February 28, 2023 7:23:20 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Regarding the annexation at Hwy 135 & Union Valley Parkway is a very bad idea in so many ways. Santa Maria should not have the right to annex Orcutt property, they only want the tax revenue.  
The traffic is getting so congested on Hwy 135 and Union Valley Parkway not only at commute time but all the time. Putting 400 apartments, 95 townhomes, restaurant, gas station, convenience market and storage which can add 1850 residents is crazy.  
The schools will definitely be impacted, as everything in Orcutt will be.  
I am very much opposed to this huge project.  
Foxenwood Resident

Sent from my iPhone

ISM-R-1  
ISM-R-2  
ISM-R-3  
ISM-R-4

### 1.4.92.1 Response to Letter from Shirley Randall

Comment No.	Response
SMR-1	<p>The comment raises concern related to the proposed annexation of the project site and taxes.</p> <p>Refer to MR-8, which responds to comment related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
SMR-2	<p>The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to traffic and transportation.</p>
SMR-3	<p>The comment raises concern related to the provision of public school facilities. Refer to MR-2, which responds to comments related to public school facilities.</p>
SMR-4	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.93 Courtnie Hayson

**From:** [courtnie.hayson](#)  
**To:** [Dana Eady](#)  
**Date:** Wednesday, March 1, 2023 10:13:27 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

To Whom it May Concern:

I am opposed to the City of Santa Maria's proposal to annex 44 acres near Union Valley Parkway and Highway 135. These roads are already busy thoroughfares with dangerous intersections. The added traffic, noise, and pollution will lower the quality of life we all enjoy in Orcutt. It would most likely create overcrowding and busier road conditions for drivers, cyclists, and pedestrians alike. I am also concerned about where the water would come from for this development as we in Orcutt are already on water restrictions. Please do not move forward with plans to annex this land and stop all plans for development.

Thank you,

[Sent from Yahoo Mail for iPhone](#)

CH-1  
CH-2  
ICH-3

### 1.4.93.1 Response to Letter from Courtnie Hayson

Comment No.	Response
CH-1	<p>The comment states that the commenter is opposed to the project because of concerns related to increases in traffic, noise, and pollution. While the commenter states opposition to the project, the commenter does not raise specific concern with the analysis contained in the EIR.</p> <p>Refer to MR-3, which responds to comments related to transportation and traffic, MR-12, which responds to comments related to noise, and MR-13, which responds to comments related to pollution. Additionally, it should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
CH-2	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
CH-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.94 Bert Johnson

**From:** Bertram Johnson  
**To:** Dana Eady; bob.nelson@countyofsantabarbara.org  
**Subject:** Annexation at Highway 135 & Union Valley Parkway  
**Date:** Wednesday, March 1, 2023 12:11:14 PM  
**Attachments:** STANDARDS FOR ANNEXATIONS TO CITIES.pdf

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear City and County,

As a resident of Orcutt I just wanted to present my opinions on this matter. I looked into the LAFCO standards regarding annexation into cities and find that this area in question violates the #1 item in their list of factors favorable to approval. ==> (Proposal would eliminate islands, corridors, or other distortion of existing boundaries.) In reality this annexation would create an island.

I also looked at the factors unfavorable to approval and found that it too violates the #1 item in their list. ==> (Proposal would create islands, corridors or peninsulas of city or district area or would otherwise cause or further the distortion of existing boundaries.) This is basically the same as the item above but you get my point.

The second factor unfavorable to approval that is my main concern is item #4 ==> (Annexation would encourage a type of development in an area which due to terrain, isolation, or other economic or social reason, such development is not in the public interest.) the key part of this item that I am interested in is the "public interest". Many people live with blinders on or feel like their opinion does not matter enough to make a difference so they go about their business letting things just....happen. I would like to know what the public interest is on this proposal. Is there a way to take a poll of Orcutt residences to find out if this annexation is or isn't in their own interest. I know that I have never been asked.

Item #5 of the factors unfavorable to approval ==> (The proposal appears to be motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.) seems a little suspect. I do not know for certain if this is true but it appears that the City of Santa Maria is wanting to eventually take over Orcutt and I am not sure that this really is in the interest of the public. Again this needs to be a focus to find out what the residents of Orcutt want. As a side note, I think that water is being used as weapon to help the City take over Orcutt

Finally, #6 of the factors unfavorable to approval ==> (Boundaries of proposed annexation do not include logical service area or are otherwise improperly drawn.) It is not a logical service area as shown by the need to use Sheriff and County Fire as the main services for this annexation. Also, I read that Righetti is at 145% of capacity. this too does not bode well for the idea of a logical service area.

BJ-1

I am not big on grandstanding at public meetings, and I don't believe that I communicate verbally very well, but I did want to make my points to someone even though I believe the powers that be have already made up their minds. I hope that the County has a representative at that meeting tomorrow.

↑  
BJ-1  
(cont'd)

I have attached the STANDARS FOR ANNEXATION INTO CITIES for your information.

Sincerely,  
Bert Johnson  
4061 Loch Lomond Drive  
Santa Maria, CA 93455

P.S. yea it also sucks that the post office lists our address in Santa Maria though we live in Orcutt

↑  
BJ-2



## STANDARDS FOR ANNEXATIONS TO CITIES

### Factors Favorable to Approval:

1. Proposal would eliminate islands, corridors, or other distortion of existing boundaries.
2. Proposed area is urban in character or urban development is imminent, requiring municipal or urban-type services.
3. Proposed area can be provided all urban services by agency as shown by agency service plan and proposals would enhance the efficient provision of urban services.
4. Proposal is consistent with the adopted spheres of influence and adopted general plans.
5. Request is by an agency for annexation of its publicly-owned property, used for public purposes.

### Factors Unfavorable to Approval:

1. Proposal would create islands, corridors or peninsulas of city or district area or would otherwise cause or further the distortion of existing boundaries.
2. The proposal would result in a premature intrusion of urbanization into a predominantly agricultural or rural area.
3. For reasons of topography, distance, natural boundaries, or like considerations, the extension of services would be financially infeasible, or another means of supplying services by acceptable alternatives is preferable.
4. Annexation would encourage a type of development in an area which due to terrain, isolation, or other economic or social reason, such development is not in the public interest.
5. The proposal appears to be motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.
6. Boundaries of proposed annexation do not include logical service area or are otherwise improperly drawn.
7. The proposal is inconsistent with adopted spheres of influence and adopted general plans.

BJ-3

### **1.4.94.1    Response to Letter from Bert Johnson**

---

<b>Comment No.</b>	<b>Response</b>
BJ-1	<p>The comment raises concern related to the proposed annexation of the project site, emergency services, and schools. The comment also claims that the project would result in a municipal island.</p> <p>Refer to MR-8, which responds to comment related to annexation and economics. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p> <p>Refer also to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, and</p>
BJ-2	<p>This comment expresses dissatisfaction in the city designation of the commenter's address. Refer to MR-5, which responds to non-substantive comments.</p>
BJ-3	<p>The commenter has provided the Standards for Annexations to Cities for reference.</p>

## 1.4.95 Chris Straub

**From:** [CHRIS STRAUB](#)  
**To:** [Dana Eady](#)  
**Subject:** \*\* Potential Spam \*\* Concerns of annexation at HWY 135 and UVP  
**Date:** Wednesday, March 1, 2023 1:31:12 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

This is a notice of concern over the annexation (for housing) of the area at HWY 135 and UVP in NSBC.

This proposed annexation and project would:

- Create more traffic in an area that is not suited for it. New traffic lights would need to be established in the proposed area as well as at UVP and Hummel Drive.
- Traffic would impose on at least two schools (Patterson Rd. and Lakeview JHS).
- Disturb the natural environment for migrating monarch butterflies and other established wildlife.
- Possibly create a strain on local water supplies among other utility and service needs (firefighters, police, etc.).

CSt-1

Thanks for reading this concern,  
Chris Straub

### **1.4.95.1    Response to Letter from Chris Straub**

---

<b>Comment No.</b>	<b>Response</b>
CSt-1	<p>The comment raises concern related to traffic, schools, biological resources, water supply, emergency services, and other utility systems.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to traffic and transportation, MR-6, which responds to comments related to water supply, MR-11, which responds to comments related to biological resources including those related to the monarch butterfly, and MR-14, which responds to comments related to utilities and associated infrastructure. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>

---

## 1.4.96 Douglas Brown

**From:** Doug Brown  
**To:** Dana Eady  
**Subject:** Richards Ranch annexation  
**Date:** Friday, March 3, 2023 4:04:50 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Good afternoon Ms. Eady-

In watching Richards Ranch development publicity over the last several months, I was wondering how anything involving the addition of approximately 1800 people could ever work in the Orcutt community. Then I read that the developer was relying on the City of Santa Maria to annex the 44 acres so that they would have enough water rights since the local water district, Golden State Water, could not supply it. Why would the city take this on?

After watching Golden State Water take over the Nipomo Community Services district water, I'm also concerned that Golden State Water will eventually end up taking on this development's water responsibility. If I followed the Nipomo water supply take-over correctly, 10% of the cost of the water line that was run under the Santa Maria River became the responsibility of Golden State Water users - even though we had no gain or benefit from this undertaking. At best, the water usage management for the Richards Ranch development will have to be managed differently than all of the rest of Orcutt. That will create neighbor animosity even more than will already be present with a project this size.

Additionally, the logic of placing a remote plot of land separate from a contiguous City of Santa Maria boundary is absurd. If the city wants to do this for tax revenues, place this development within or adjacent to existing city limits - there is plenty of room either east of the 101 freeway or west of Blosser Rd.

Please stop this development before it goes any further - it does not make sense for either Orcutt or Santa Maria.

Thank you for your consideration.

Sincerely,  
Douglas Brown  
4426 Countrywood Dr.  
Santa Maria, CA 93455

DB-1

DB-2

DB-3

### 1.4.96.1 Response to Letter from Douglas Brown

Comment No.	Response
DB-1	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
DB-2	<p>The comment raises concern regarding annexation and suggests a different location for the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>
DB-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.97 Josh Islas

**From:** [Josh Islas](#)  
**To:** [Dana Eady](#)  
**Subject:** NO TO ANNEXATION  
**Date:** Friday, March 3, 2023 2:30:44 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

I have lived in Orcutt my whole life and greatly disapprove of this annexation!!! Just build it in Santa Maria. Seems pretty stupid to have just a chunk there be santa maria!!! That road and area is crowded enough already and this will be a disaster. As a lifelong resident I can't tell you how much I'm against this and think what you're trying to do is BS. Stay out of Orcutt!

JI-1

Sent from Samsung Galaxy smartphone.

### 1.4.97.1 Response to Letter from Josh Islas

Comment No.	Response
Jl-1	<p>The comment raises concern related to an increase in traffic, population growth, and suggests a different location for the project site.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation, MR-8, which responds to comments related to annexation and economics and MR-15, which responds to comments related to population growth and other public services.</p> <p>Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>



## 1.4.98 Maureen Soderberg

**From:** [Maureen Soderberg](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch/UDP Development  
**Date:** Friday, March 3, 2023 1:51:41 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello

I would like to comment regarding the Richards Ranch/UDP Development. The intersection at Hummel and Union Valley Parkway (UDP) is a dangerous place for pedestrian traffic due to having no stop sign, and a high speed limit on UDP. With the increased traffic coming to this area, I would propose a pedestrian bridge. The existing caution lights are ineffective.

Additionally, at this intersection, the traffic turning East onto UDP from Hummel has to pull out into traffic going 50+mph which creates a high probability of getting rear ended.

Thank you,  
Maureen

MSO-1

### **1.4.98.1    Response to Letter from Maureen Soderberg**

---

<b>Comment No.</b>	<b>Response</b>
MSO-1	The comment raises concern related to an increase in traffic hazards. Refer to MR-3, which responds to comments related to traffic and transportation.

---

## 1.4.99 Steve Strachan

**From:** [Steve Strachan](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch Annexation  
**Date:** Friday, March 3, 2023 10:21:02 AM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello,  
Im writing to express concerns with the proposed annexation of the Richards Ranch property.  
The location of the property is isolated from the Infrastructure that the City maintains. The large amount of residents that will occupy the housing will most likely be using county maintained facilities and infrastructure.  
With this being city land all development fees and Quimby fees will go to the city. This will leave the North County unincorporated area of Orcutt responsible for Parks, Open space, Sheriff, Fire,Etc.  
Im sure some money will come out of the Tax Exchange Agreement, however that will most likely be a fraction of what is needed to cover the impact of the development.  
This is only my main concern. I have many more.  
Thank you for your time.

SS-1

Steve Strachan  
715 Pinal Ave Orcutt Ca  
93455  
805-878-9509  
sstrachantr6@gmail.com

### **1.4.99.1    Response to Letter from Steve Strachan**

---

<b>Comment No.</b>	<b>Response</b>
SS-1	<p>The comment raises concern related to the proposed annexation of the project site, population growth, infrastructure, emergency services, and recreation.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to the transportation system, MR-7, which responds to comments related to recreation and open space, MR-8, which responds to comments related to annexation and economics, and MR-14, which responds to comments related to utilities and associated infrastructure. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

---

## 1.4.100 Carolyn Christiansen

**From:** Pam Gates  
**To:** Dana Eady  
**Subject:** Draft EIR Comments  
**Date:** Sunday, March 5, 2023 4:04:18 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello Dana -- the following comments were written by a neighbor who does not have a computer but wants to express her opinion on the draft EIR report for the proposed annexation by the City of Santa Maria of unincorporated county land. Her name is Carolyn Christiansen and her address is 135 Abby Road, Santa Maria, CA 93455.

Her comments:

When I see the map of the proposed annexation of a portion of independent Orcutt into the City of Santa Maria, by a larger, more powerful city, I see an attempt to overpower and confiscate a portion of land belonging to Orcutt, solely to develop this land to provide additional tax revenue for Santa Maria (not Orcutt).

Orcutt has historically protected itself and its residents from just this type of infusion of commercialism.

Thank you for considering my comments.

Carolyn Christiansen

Submitted by Pam Gates on behalf of Carolyn Christiansen

CCh-1

### **1.4.100.1 Response to Letter from Carolyn Christiansen**

---

<b>Comment No.</b>	<b>Response</b>
CCh-1	<p>The comment raises concern related to the proposed annexation of the project site and taxes.</p> <p>Refer to MR-8, which responds to comment related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

---

## 1.4.101 Steve LeBard

**From:** Steve LeBard  
**Sent:** Monday, March 6, 2023 6:49 PM  
**To:** Dana Eady; [lafco@sblafco.org](mailto:lafco@sblafco.org)  
**Subject:** Opposition to the City of Santa Maria Annexing Orcutt Land (Richard's Ranch) and Notification of Orcutt's Intent to Establish Cityhood

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Please find attached my letter of Opposition to the City of Santa Maria Annexing Orcutt Land (Richard's Ranch) and Notification of Orcutt's Intent to Establish Cityhood.

Thank you,  
Steve LeBard  
805-714-1165  
email [admin@orcutt.biz](mailto:admin@orcutt.biz)

Steve LeBard  
5290 Gladewood Place  
Orcutt, Ca 93455  
(805) 714-1165

Santa Barbara LAFCO  
105 E. Anapamu Street  
Santa Barbara, California 93101

Re: Opposition to the City of Santa Maria's Annexation of Orcutt Land  
(Richard's Ranch) and notification of Orcutt's intent to establish cityhood.

Dear Members of LAFCO,

We the citizens of Orcutt are quite alarmed that the City of Santa Maria is attempting to incorporate Richard's Ranch into the city - forty three plus acres of Orcutt heartland, located at Union Valley Parkway and Orcutt Road.

The City of Santa Maria claims that this property is in their sphere of influence yet it is separated by California State Highway 135. Their connection appears to be farmland controlled by and in close proximity to the Santa Maria Airport – a common sense “NO BUILD” due to airplane traffic. Equally insulting to the citizens of Orcutt is the City of Santa Maria's contentions that most of Orcutt is in the city's sphere of influence. Orcutt cannot allow Santa Maria to cherry pick prime Orcutt real estate.

Richard's Ranch (a project consisting of 400 apartments, 95 townhomes and a retail commercial center) is located on Key Site 26, an integral part of the Orcutt Community Plan. This plan was adopted in 1997 by the Santa Barbara County Board of Supervisors. The Orcutt Citizen's Advisory Committee played the major role in creating this plan – after all it is our home. All 34 Key Sites in the Orcutt Community Plan work together. Any changes to this plan need to be done by the citizens of Orcutt.

The City of Santa Maria wants to annex this property for two reasons – tax revenue and state housing mandates, at Orcutt's expense.

If the city did not want the tax dollars from the retail/commercial aspect of this project they would sell the developer supplemental water and the project would be built under the guidelines of the Orcutt Community Plan.

SLB-1



The project would be built with oversight and input from our County Supervisor, the Santa Barbara County Building and Planning Department, the Architectural Review Board and Orcutt citizens.

↑ SLB-1  
(cont'd)

No doubt that the apartment dwellers in this project will use Orcutt's resources in abundant fashion – schools, law enforcement, fire & rescue, parks, recreation, trails and roadways will be overwhelmed at the expense of Orcutt citizens – taxation without representation. Orcutt's limited medical resources will be further taxed.

↑ SLB-2

Orcutt's roads are in poor condition compared to Santa Maria's roads. Trees line Santa Maria roads, where trees along Orcutt roads are sparse. Orcutt roads will only get worse with this influx of traffic.

↑ SLB-3

Santa Maria controls Orcutt's water. Every time Orcutt has the opportunity for a significant commercial development (needed to support cityhood) Santa Maria plays the "Monopoly Water Card", refusing to sell supplemental water to Orcutt projects - but happy to annex and bankroll the city. Ironically, Orcutt has a vast supply of underground water.

↑ SLB-4

In the 1980's the Santa Barbara County Board of Supervisors (Including Orcutt's Supervisor who later served on the Santa Maria City Council) decided that Orcutt did not need state water. Santa Barbara County's modus operandi was to control growth with water.

↑

The State of California in mandating affordable housing. The City of Santa Maria and the County are going to Orcutt to meet their allocations, when Orcutt has its own allocations.

↑

With Orcutt's median household income of \$95,916 and Santa Maria's median household income of \$67,634, per capita Orcutt exceeds (expenditures & taxes) Santa Maria by forty two percent.

↑

With more expendable income Orcutt has exponentially supported Santa Maria's economy - Costco, Home Depot/Lowes, car dealerships, big box stores, hospitals etcetera. Santa Maria reaps the benefits via taxes without providing any services.

↑ SLB-5

Orcutt's Veteran population per capita is more than double that of Santa Maria yet Orcutt has no Veterans Memorial Building. Much smaller cities in Santa Barbara County have Veterans Memorial Buildings including Solvang, Carpinteria and Guadalupe.

↑

Santa Maria tore down their historical downtown and built a shopping mall that continually struggles. Orcutt residents assembled forming a non-profit "Old Town Orcutt Revitalization Association" that successfully transformed Old Town Orcutt

↑

into a thriving historical downtown.

The City of Santa Maria's sales tax rate is 8.75%. If Santa Maria is allowed to annex this property Orcutt residents will pay the higher sales tax rate and not Orcutt's rate of 7.75%.

We are assembling a group of Orcutt folks to Incorporate Orcutt, California – established 1904. If successful, Orcutt would become the third largest city in Santa Barbara County - larger than Guadalupe, Buellton, Solvang, Carpinteria, Goleta and Lompoc.

Respectfully submitted,  
Steve LeBard  
admin@orcutt.biz

↑  
SLB-5  
(cont'd)

## 1.4.101.1 Response to Letter from Steve LeBard

Comment No.	Response
SLB-1	<p>The comment raises concern related to the proposed annexation of the project site, taxes, and compliance with the OCP.</p> <p>Refer to MR-8, which responds to comment related to annexation and economics and MR-17, which responds to comments related to land use consistency. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p> <p>It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
SLB-2	<p>The comment raises concern related to the provision of public school facilities, emergency services, population growth, and recreation and trails.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-7, which responds to comments related to parks and recreation, and MR-15, which responds to comments related to population growth and other public services.</p> <p>Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>
SLB-3	<p>The comment raises concern related to roadway conditions. Refer to MR-3, which responds to comments related to the traffic and transportation.</p>
SLB-4	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
SLB-5	<p>The comment raises concern related economics and achieving the County's RHNA goals. The comment also notes the lack of Veterans Memorial Building in Orcutt.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p> <p>Santa Maria's Veterans Memorial Park is located 5.5 miles north of the project site and is currently undergoing renovations. The Santa Maria Veterans' Services Office is also located only 0.5 miles west of the project site.</p>

## 1.4.102 Salvador Melendez II

City Of Santa Maria

March 5, 2023

Attn: Dana Eady  
110 E Cook Street  
Santa Maria, CA 93454

Dana,

I am writing about the Richard's ranch annexation proposal. My family and I moved to Orcutt in late 2013. Soon after the 101 off-ramp project was completed at UVP. It was a welcome addition to the community. And clearly long awaited.

This project is different. It seems as though most in the community were not expecting a development here or do not wish any development. I am for development of these parcels. I would prefer a retail development to reduce driving needs for the community. Things like retail, grocery, pet services, restaurants and a deli would be ideal. Also personal services like hair and nail, chiro or massage therapists. I feel like many of the residents here would embrace a commercial development like this because I see so many of them walking the neighborhood.

I think the project should remain part of the county and Orcutt community for the following reasons. The Orcutt community has very limited options for commercial development, this being one of the larger options, losing this to the city of Santa Maria would essentially take away any future option of incorporating the community of Orcutt would have. Also, this un developed parcel is hardly an extension of the existing city limit. It is surrounded on three sides by county and Orcutt community residents. And the only city development of any significance is a small residential area across hwy 135. The next substantial city development is the airport which is probably a mile from this development.

Whatever development that does happen should definitely allow open spaces for public use. Even if part of it is just as it is now, largely unkempt except for an annual mow. I think the community would be happy with that.

SMII-1

SMII-2

Currently the parcel is home for some owls and some birds of prey. There has been some talk of butterflies, however I will admit my exposure to them has been limited. Whereas the owls taunt my pets at night and we see the beauty of the hawks every spring and summer. Not to mention the occasional snake and scorpion in our backyard. Those certainly have there place in the circle of life, but I will not miss them if they should go. The birds would of course be missed.

SMII-3

Now to the issue of water rights. It's clearly the driving force behind the annexation for the property owner. I have limited understanding and would like to know and hope to find out that there are additional sources of the required water for this development that don't include annexation. At the LaFCo meeting on March 2nd, some points were raised by one of the commissioners that made me think this was a possibility. Certainly this key issue will drive the project and my hope is that the county can provide some suitable options to the owner to keep the project as part of the Orcutt community.

SMII-4

And as for the county, I believe the board of architectural review has its place and will help represent the community as part of the development and planning process. I understand that the city of Santa Maria does not have a similar process and largely leaves those aesthetic issues up to the developer and their architects. Thus keep the community on the outside and no option for improvement.

SMII-5

Sincerely yours,

Salvador Melendez II, Mooncrest Lane, Orcutt

## 1.4.102.1 Response to Letter from Salvador Melendez II

Comment No.	Response
SMII-1	<p>The comment raises concern related to the proposed annexation of the project site and requests that commercial uses be incorporated into the project.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p> <p>The conceptual development plan includes a mix of commercial and high-density residential uses. The northern portion of the project site (north of UVP) would support most of the proposed commercial uses, allowing for up to 96,800 square feet of commercial development. Additional commercial uses at the southwestern portion of the site are anticipated to accommodate up to two drive-through commercial sites, totaling a maximum of 10,000 square feet. Future project buildout of any of these uses within the project site would require individual Planned Development Permit applications for development of each of the proposed residential and commercial projects. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA.</p>
SMII-2	<p>The comment raises concern related to recreation and open space.</p> <p>Refer to MR-7, which responds to comments related to recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
SMII-3	<p>The comment raises concern related to biological resources. Refer to MR-11, which responds to comments related to biological resources.</p>
SMII-4	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
SMII-5	<p>The comment raises concern related to visual impacts. Refer to MR-10, which responds to comments related to aesthetic resources.</p>

## 1.4.103 Adolph Sherer

**From:** Adolph Sherer  
**To:** Dana Eady; Nelson@bos.countyofsb.org  
**Subject:** Questions & Comments on Richards Ranch Annexation Project (AN2021-0001)  
**Date:** Monday, March 6, 2023 10:03:02 PM  
**Attachments:** Comments on Richards Ranch Annexation Project.docx

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello Planning Division Manager Dana Eady, and SB County 4th District supervisor Bob Nelson,

Please see my questions and comments for the proposed Richards Ranch Annexation Project (AN2021-0001), attached.

Thank you for your time and consideration,  
Adolph Sherer  
805-264-2992  
[sherer.ad@gmail.com](mailto:sherer.ad@gmail.com)

To:

Dana Eady  
Planning Division Manager  
[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)  
(805) 925-0951 ext. 2444

Subject: Comments on the RICHARDS RANCH ANNEXATION PROJECT (AN2021-0001),  
DRAFT ENVIRONMENTAL IMPACT REPORT, SCH NO. 2022020194,  
Dated: February 8, 2022

Hello,

My Name is Adolph Sherer and I am a SB County resident living just north of Foster Road. I am deeply concerned with the amount of traffic congestion we have already in the greater Orcutt area. It usually takes me two lights to get from the Orcutt Frontage Road onto highway 135 south bound land for work each morning. I have tried adjusting my hours to find a time when I can just get onto the highway without waiting through multiple lights, but to no avail.

AS-1

I Looked up the City Of Santa Maria Major Developments Map from January 2022 and see that the City is planning to Build 1,811 apartments and 116 Single Family Homes that are on your books for this next year. 682 apartments are less then 2 miles from my house.

- Site 44 – Santa Maria Studios – 378 Senior Affordable Units
- Site 45 – Park Edge Apartments – 140 Apartments
- Site 50 – Lakeview Mixed Use – 164 Apartments

My Biggest question is why does the City of Santa Maria need to annex the land in the Richards Ranch Project to build an additional 400 apartments and 95 townhomes in Orcutt???

The City of Santa Maria has lots more land that is already zoned for this type of constriction, and no other big projects likes this. So Why do they need to Annex the land in our Neighborhood???

AS-2

My first home was purchased in Santa Maria, and after 11 years we sold and moved to Orcutt because there was more of a country feel, and it wasn't as crowded and there was more land in between your neighbor's house and yours. We wanted to get away from the crowded streets, tightly compacted neighborhoods and businesses.

We want Orcutt to stay Orcutt!!!

I only found out about this project from an article in the Orcutt Pioneer and attended the LAFCO Meeting last Thursday 3/2/23 to express my concerns about this project.

Here are my questions about the Richards Ranch Annexation Project (AN2021-0001), Draft EIR, Sch No. 2022020194

- 1) Can we get an extension on the comment period for the EIR?
- 2) The Sewer Facilities Exhibit shows an existing 12" Sewer main on Foster Road and this project would replace the existing 6" sewer feed line down Orcutt Frontage Rd with an 8" sewer line to feed all 500 units. I know that living in Santa Maria we had problems with the sewer systems and their capacity to handle all the dwellings they keep adding to the system. Why don't they bring a 12' main sewer line down from Foster Road to accommodate these 500 new units?

IAS-3

AS-4



- 3) Storm Drains and Water retention basins: the plans call for 2 or 3 storm drains/basins depending which views you are looking at. Will these basins be enough to handle another La Nina or El Nino rainy seasons???
- We just had the major Storm damage up at Union Valley Parkway and Bradly Road where the Strom Drains/Basins overflowed and cut under Union Valley Parkway destroying multiple homes and Neighborhoods
- 4) Wire Utilities Exhibit show a mixed bag of above ground and below ground electrical utilities. The developer will be digging up the Orcutt Frontage Road to bring down the Sewer, Water, and Power, so why should there be any overhead power in this area? They should put all power underground to protect it from the weather, and all the accidents and multiple fatalities there have been at the intersection of Union Valley Parkway and SR135. We have had many power issues in the Santa Maria and Orcutt areas for the past 25 years, and its best to protect power underground. The power company placed a main disconnect on our street to allow them to cut the power between Santa Maria and Orcutt in case of an emergency like they had a few years ago. This will now leave Orcutt powered on while Santa Maria goes dark again...
- 5) Traffic studies were last taken during COVID-19 years when most people we staying home. Is there an updated study? Additionally, the latest study was only conducted at UVP/Hummel Drive. Not only does this study need to be revised based on the current traffic levels, they need to look at Lakeview/SR135, Foster Rd/SR135, and UVP/SR135! We still have approximately 20% of our workforce working from home right now.
- 6) Traffic "Level of Service" (LOS): The County of Santa Barbara considers LOS C as the minimum acceptable operating standard. However, the City of Santa Maria Circulation Element considers LOS D acceptable for roadway and intersection operations. How is this acceptable considering an A-F scoring system? Foster RD/SR135 had a LOS C during COVID-19 and traffic has just gotten worse at this intersection.

Please look into these real issues to help determine the best solution for this land.

The increasing population and the compression of people/housing in urban environments is the underlying reason why the City of Santa Maria now has much worse traffic accidents and congestion than ever before.

We would like Orcutt to stay Orcutt and grow by the Orcutt Community Plan , not the Santa Maria Plan! ORCUTT COMMUNITY PLAN Orcutt Community Plan KS26.1 KEY SITE 26 (Richards) This site, APN 107-250-11 (6.36 ac), -12 (4.5 ac), and -13 (40.66 ac), is located on the east side of Orcutt Road and Highway 135, south of Foster Road and west of Hummel Drive.

We do not want the Annexation of this Orcutt property to the City of Santa Maria!

Please let Orcutt follow its own plans!

Thank you for your time and consideration,  
Adolph Sherer  
[Sherer.Ad@gamil.com](mailto:Sherer.Ad@gamil.com)

AS-4  
(cont'd)

AS-5

AS-6

### 1.4.103.1 Response to Letter from Adolph Sherer

Comment No.	Response
ASh-1	The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to the traffic and transportation.
ASh-2	The comment raises concern related to housing development and the proposed annexation of the project site. Refer to MR-8, which responds to comments related to annexation and economics, and MR-15, which responds to comments related to population growth and other public services.
ASh-3	This comment requests an extension of the comment period. Refer to MR-5, which responds to non-substantive comments.
ASh-4	The comment raises concern related to flooding, sewers, and other utilities. Refer to MR-14, which responds to comments related to other utilities and associated infrastructure and MR-16, which responds to comments related to hydrology. With required adherence to the California Building Codes and implementation of identified mitigation measures, future development on the project site would not result in potentially significant impacts associated with off-site flooding.
ASh-5	The comment raises concern related to an increase in traffic and population growth. The commenter also claims that the traffic analysis prepared for the project is inadequate because it is based on unusually low traffic levels during the Covid-19 pandemic. Refer to MR-3, which responds to comments related to traffic and transportation. The traffic counts used for the analysis were collected in 2019 and thus represent conditions prior to the Covid-19 pandemic. Supplemental traffic counts conducted on South Broadway and UVP in 2023 showed less traffic than the 2019 traffic counts, thus the analysis completed in the traffic study is conservative. Refer to EIR Volume 2, Appendix C for the traffic count data that was conducted in 2023. Refer also to MR-15, which responds to comments related to population growth and other public services.
ASh-6	The comment raises concern related to the proposed annexation of the project site and compliance with the OCP. Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.

## 1.4.104 Susan Wilson

**From:** Albert Silva  
**To:** Dana Eady  
**Subject:** Richard Ranch Annexation  
**Date:** Monday, March 6, 2023 4:45:49 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Richard's Ranch Annexation EIR

Dana,

In the beginning stage of developing the EIR we provided our comments regarding the Richard's Ranch Annexation proposal. Those comments remain our concern. We have continued to follow its development though the preparation of the EIR and had discussions with other Orcutt community residences in the area. Our position remains opposed to this annexation for reasons as follows:

The backyard of our home is adjacent to the proposed development. We feel this proposed high density development will completely change the environment within which we live. We do not like the high congestion this development represents. It is not consistent with the Orcutt community plan which is where we have chosen to live because we like the plan and want the area to be developed accordingly. We are not interested in nor do we have a need for the commercial development represented in this project. Traffic congestion is already a problem and we see this project as adding to that problem and making it intolerable.

We live on Mooncrest Lane which already gets more than its fair share of traffic given it is an express route between Hummel and the Orcutt Express frontage road. Given this express route, this traffic often exceeds the speed limit which creates safety concerns. We see this project as adding to that problem. We also see the Mooncrest Lane pedestrian traffic increasing dramatically due to this project's access to Dancer. Dancer and Mooncrest Lane will probably be a sole path for this development's children going to and from school.

We see this project as destruction of the Eucalyptus grove and the Monarch butterfly habitat that these trees represent. In past years we have walked through these Eucalyptus trees and have seen Monarch butterflies in the trees. Recently one of the nearby residents took pictures of some butterflies in these trees. There were only a few at the time but where there are some there are more. These butterflies have been in decline mainly due to a decline in their habitat which makes the preservation of these trees very important. Our concerns are genuine in that in recent years we have donated to charity efforts to save the Monarch butterflies and their habitat.

We live within the Orcutt community because we like and identify with the environment this unincorporated community provides. We do not like the City of Santa Maria environment and feel this annexation is invading our community and will forever negatively change the Orcutt community environment we love. We feel the City of Santa Maria should stay on the west side of Orcutt Express and let the east side of Orcutt Express remain as part of the unincorporated Orcutt Community. Orcutt Express

SW-1

SW-2

SW-3

SW-4

is a good divide between the two.

We do not see this annexation as a contiguous expansion of the City of Santa Maria. We see it as the City of Santa Maria creating an island or peninsula across the street from Orcutt Express.

We are not opposed to the development of this property. We just want it developed consistent with the Orcutt Community Plan and to remain consistent with the residential community within which we live. We do not understand why the developer cannot work with Santa Barbara County to develop this property in a manner consistent with the unincorporated Orcutt Community plan. We understand it may require some negotiation with the City of Santa Maria regarding water and taxation but feel this is very doable.

We understand Santa Barbara County has expressed an interest in working with the developer on this project but the developer has chosen not to do so and has instead chosen the path of annexation at the expense of Orcutt community residences in the area.

We also have a home at 6645 N. Farris Ave. Fresno, CA. 93711. So, if you were to mail us something you can use this address.

Susan Wilson

373 Mooncrest Lane

Santa Maria, CA.

↑  
SW-4  
(cont'd)

↑  
SW-5

↑  
SW-6

### 1.4.104.1 Response to Letter from Susan Wilson

Comment No.	Response
SW-1	<p>The comment raises concern related to the proposed annexation of the project site and compliance with the OCP.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
SW-2	<p>The comment raises concern related to traffic.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. It should be noted that Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p>
SW-3	<p>The comment raises concern related to wildlife that use the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.</p>
SW-4	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island.</p>
SW-5	<p>The comment indicates that the commenter believes that annexation is not in the best interest of the established community that already exists in this area. The comment also suggests developing the project through the County, rather than through the City.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p> <p>It should be noted that it is the choice of the Applicant whether to pursue development under the City through proposed annexation and/or to pursue development under the existing jurisdictional boundaries within the County. However, the preference of the Applicant does not guarantee approval of the proposed annexation. SBLaFCO has the discretion to approve or deny the proposal for annexation. The suggestion regarding developing the project through the County is not a comment on the environmental analysis contained in the EIR. The concerns raised do not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
SW-6	<p>The commenter has provided an additional mailing address. Refer to MR-5, which responds to non-substantive comments.</p>

## 1.4.105 Carla and Ken Canby

**From:** [Carla Canby](#)  
**To:** [Dana Eady](#)  
**Subject:** Union valley annex  
**Date:** Tuesday, March 7, 2023 12:06:46 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dana Eady,  
My husband and I have lived in Orcutt for the past 38 years. We also own and operate a small machine shop at Betteravia and Skyway drive. Poor departed Bud Richards did his very best to keep the city from stealing his property for their own financial gains due to the unfortunate sanctuary status that has and continues to deplete the tax coffers. So much high density housing, filled with section eight families, creating unrealistic rentals by greedy owners and corporations hiding within the prop 13 tax law while charging top dollar rent. We are landlords as well and wouldn't even dream of charging a family \$3500 as they do in the low income housing on Bradley road for a three bedroom condo, ridiculous. Slowly Santa Maria council agenda is creeping into Orcutt and ruining our single family lifestyle neighborhoods. You continue to raise our taxes, gas, electricity and water bills and build even though we receive letters telling us we have no water to spare. Why then do we continue to import poverty- giving illegals especially, housing, medical care, schooling. The legal citizens of Orcutt and Santa Maria continue to foot the tax bill, and our children can't afford to rent or purchase homes of their own. Our schools are so overwhelmed that we have had to give up the arts and sports to make way for non-credentialed Spanish speaking teacher assistants. Take a stroll down Main Street, I'm sure no one on the council would do that alone in the evening, and now you want to continue to filter the destruction to our little community- in the name of what... pure greed and the inability of doing what the citizens need, want and have worked so hard for. Shame on you. Santa Maria and Orcutt were such gems thirty years ago. We recently sold one of our rentals by owner, nothing but LA corporations called-trying to take advantage of the last affordable housing on the central coast. Fortunately we were able to sell to a young local man whose grandfather lived around the corner. A lot to be said for old school business transactions. Oh yeah- where is the aqua center Orcutt that was promised 30 years ago?...same spot. The gangs, drugs, crime, rapes, teen pregnancies, uninsured motorists driving unlicensed and in non registered vehicles- when is someone, anyone of you going to stand up and search for a more balanced approach to this excessive and unsustainable growth? Guess you want to have it both ways. My parents were legal immigrants. We came here to be American citizens and work hard for our community and country- pride. We continue to become heartbroken as many of our friends, neighbors and our own kids have fled to other states because of the continuing demise of our town. We realize that this desire to hear from us will fall on deaf ears. I'm sure most council members live on the fancy side of south Broadway, foxenwoods and such. Where roads are neatly maintained and illegal gardeners cheaply do your lawn work and detail your cars for cash. So close your blinds and appreciate getting paid more than you're worth. Enjoy your employee benefits as the rest of us struggle to provide our own. Yes we are angry and frustrated and do not want to be annexed.

CKC-1

Regards, Carla and Ken Canby- Orcutt (805) 934-1601

### **1.4.105.1 Response to Letter from Carla and Ken Canby**

---

<b>Comment No.</b>	<b>Response</b>
CKC-1	This comment states opposition to the proposed project. Refer to MR-5, which responds to non-substantive comments.

---

## 1.4.106 Scott and Cathy Wells

**From:** [Cathy DeCaprio-Wells](#)  
**To:** [Dana Eady; lafco@sblalafco.org](mailto:Dana.Eady@lafco@sblalafco.org)  
**Subject:** No annexation of Orcutt land to Santa Maria  
**Date:** Tuesday, March 7, 2023 6:15:16 PM

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello, we strongly oppose the proposed annexation of parts of Orcutt to Santa Maria along with the planned dense housing. Orcutt roads, schools and services can not handle that kind of influx and the disruption to life here in Orcutt. Please listen to the majority of the Orcutt residents and do not move forward with this plan.

Thank you,  
Scott and Cathy Wells

Sent from my iPhone

SCW-1



### **1.4.106.1 Response to Letter from Scott and Cathy Wells**

---

<b>Comment No.</b>	<b>Response</b>
SCW-1	<p>The comment raises concern related to public schools, emergency services, utilities, roads and the proposed annexation of the project site.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to the transportation system, MR-8, which responds to comments related to annexation and economics, and MR-14, which responds to comments related to utilities and associated infrastructure.</p>

---

## 1.4.107 Felix Diaz

**From:** Felix  
**To:** Dana Eady  
**Subject:** EIR comments/concerns  
**Date:** Tuesday, March 7, 2023 3:16:20 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dana,

Here are my concerns regarding the Richards Ranch Annexation. I reside on the street to the north of this development, Mooncrest Lane.

I am familiar with the parking issues the city is having with the Montivavo apartments in Santa Maria and do not want my neighborhood to have the same issues. You have many upset residents in that area, and I basically don't want the same for my neighborhood. I'm simply asking that Dancer into Mooncrest be closed off to both pedestrian and vehicle traffic. I think I speak for most they shouldn't be able to park in front of our homes if I can't park in the proposed gated community. This issue will only depreciate the value of my home which I have invested by money and sweat into.

FD-1

I believe the EIR underestimated the number of accidents on Union Valley Parkway. Within the last 6 months two of our neighbors have had their cars totaled on Union Valley Parkway/Orcutt Rd one happening this last weekend. The light at Hummel isn't going to fix that. I would like the EIR to look into all the traffic collision that occurred in that area and I'm not just talking about the ones CHP/SMPD took reports on, I'm talking about all of the accidents that were called in and drivers may have exchanged information rather than opting for it to be documented in a report. Adding these 500 homes in only going to cause a bigger bottleneck in that area as it goes from two lanes to one lane and back to two lanes.

As for the annexation, I detest how the city elects to refuse to sell water to developers in the County for projects like this in Orcutt. The Orcutt community alone provides millions to the City of Santa Maria thru tax revenue at businesses, car dealerships etc... And for the City to turn around and set their own rules for new projects is distasteful.

FD-2

Orcutt already has a shortage of daycares, preschools, and after school activities/sports for kids. By adding this many homes, these issues will only be compounded. Public safety is also another issue; the city is already short staffed in police resources despite the city continuing to grow and to add apartment complexes throughout. This island you call a "sphere of influence" is only going to stretch those resources out even further for your own residents and the new tenants of this proposed annexation.

FD-3

Sincerely,  
Felix Diaz  
336 Mooncrest Lane  
Santa Maria, CA 93455

Sent from my iPhone

## 1.4.107.1 Response to Letter from Felix Diaz

Comment No.	Response
FD-1	<p>The comment raises concern related to traffic safety and parking.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
FD-2	<p>The comment raises concern related to the proposed annexation of the project site and water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p> <p>Additionally, refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
FD-3	<p>The comment raises concern related to the proposed annexation of the project site, public schools, emergency services, recreation, housing development, and the City's sphere of influence (SOI). The comment also states that the project would result in a municipal island.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-7, which responds to comments related to the recreation, MR-8, which responds to comments related to annexation and economics, MR-15, which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency, and MR-15, which responds to comments related to population growth and other public services.</p> <p>The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island. SBLAFCO is responsible for establishing, amending, and updating SOIs and city limits for the cities within Santa Barbara County. The project site and much of the surrounding area was previously determined to be within the City's SOI by SBLAFCO.</p>

## 1.4.108 Tara Diaz

**From:** Tara Mead  
**To:** Dana Eady  
**Subject:** Richards Ranch Annexation  
**Date:** Tuesday, March 7, 2023 9:16:44 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dana,

I am writing today, as a resident of Orcutt, to express my concerns regarding the Richards Ranch Annexation. I reside on the street that this development neighbors, Mooncrest Lane.

My main concern has to do with traffic and parking if Dancer Ave. is open to the townhomes. I live on a corner lot of Mooncrest Ln. and Dancer Ave. We already have issues with traffic on Mooncrest Ln. People speed from Orcutt Rd to Hummel to avoid traffic on Union Valley Parkway. On top of that, if there is any type of access from Dancer Ave. to the townhomes, including just pedestrian access, residents of the townhomes will use Mooncrest Ln. & Dancer Ave. for overflow parking. If this happens our home values will depreciate, just like the homes near other Santa Maria apartment structures. I would like to go on record to state that we do not want any type of access opening from Dancer Ave. to the townhomes. If we can't park in front of their townhomes, they shouldn't be able to park in front of our homes.

Staying on the topic of traffic, we feel the EIR greatly underestimated the amount of accidents on Union Valley Parkway. Within the last 6 months two of our neighbors have had their cars totaled on Union Valley Parkway/Orcutt Rd. The light at Hummel isn't going to fix that. As a neighbor mentioned at the meeting, it will only push back the bottleneck. Something bigger needs to happen. I think people get confused as to which traffic light is for the intersection at Orcutt RD and the 135, because they're so close to one another.

Another concern I feel is worth mentioning is the airport traffic. Again, my house is directly across the street from where the townhomes and apartments will be and there are large helicopters and jets going right over my home straight to that lot. My house is a single story home and my pictures are literally shaking right now as a helicopter practices their maneuvers to the airport. I can not imagine what it would be like to be in a two story townhome or a 3 story apartment.

As for the annexation, it does seem a little odd to have these lots (Richards Ranch) be Santa Maria when there aren't any other Santa Maria residents close by. The other Santa Maria lots that are across the 135 are vacant commercial lots, so it looks like an island of Santa Maria residents surrounded by Orcutt residents. Keeping this in mind, the new Santa Maria commercial businesses will be mainly supported by Orcutt residents. It

TD-1

TD-2

TD-3

would be nice to keep these lots as Orcutt so that revenue taxes would go back into Orcutt.

↑ TD-3  
I (cont'd)

Lastly, I would like you to also consider the shortage Orcutt already has of daycares, preschools, and after school activities/sports for kids. By adding this many homes, these issues will only be compounded.

I TD-4

Thank you for your time.

Sincerely,

Tara Diaz  
336 Mooncrest Lane  
Santa Maria, CA 93455

### 1.4.108.1 Response to Letter from Tara Diaz

Comment No.	Response
TD-1	<p>The comment raises concern related to traffic safety and parking.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only, if necessary.</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
TD-2	<p>The comment raises concern related to building height hazards associated with Santa Maria Airport. Refer to MR-4, which responds to comments related to airport hazards.</p>
TD-3	<p>The comment raises concern related to the proposed annexation of the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>
TD-4	<p>The comment raises concern related to public schools and recreation. Refer to MR-2, which responds to comments related to public school facilities and MR-7, which responds to comments related to the recreation.</p>

## 1.4.109 Pam Gates

**From:** [Pam Gates](#)  
**To:** [Dana Eady](#)  
**Subject:** Comments on Draft EIR  
**Date:** Tuesday, March 7, 2023 3:34:53 PM  
**Attachments:** P.Gates Comments re EIR Annexation Rpt.docx

---

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Hello Dana -- The EIR is a very long and complex report and while I have many objections to the annexation based on it, I have included my main points in the attached document. I look forward to the City's responses and to participating in future conversations on this project.

Pam Gates  
"Outrage without action is just privilege comforting itself." Sonya Renee Taylor

PG-1

#### Response to EIR

I want to be clear that I do not oppose development on this site. I understand that both Santa Maria and SB County are required by the State to build more housing. However, I would prefer that the land remain in unincorporated SB County with affordable housing built on it, not more “upper-echelon” (developer’s word), gated communities like Rice Ranch.

My main objections are in the following areas:

1. According to LAFCO’s standards for annexation, there are three factors that are “unfavorable” in my opinion.

a) “Proposal would create islands, corridors of city or district area or would otherwise cause or further the distortion of existing boundaries.” Even though the proposed annexed land is within the City’s sphere of influence, that boundary is arbitrary until such time as LAFCO approves the annexation. Further, the proposed annexed land is bounded on three sides by unincorporated County land. On the fourth side is Hwy 135/Broadway which is not City land. Annexing these parcels would therefore create an island and “cause/further” the distortion of *existing* boundaries.

b) “Annexation would encourage a type of development in an area which due to terrain, isolation, or other economic or social reason, such development is not in the public interest.” I object to the term “sphere of influence” as a continuation of colonialism, a large part of U.S. history where one group seizes land from another. Many people in Orcutt chose to live here because they did not want to live in Santa Maria. For the City to now claim land that borders on county land is not in the public interest.

c) “The proposal appears to be motivated by inter-agency rivalry, land speculation, or other motives not in the public interest.” The Orcutt Community Plan already addresses the needs of the community. Granted it needs to be updated but it should be done in such a way that includes community input and the current lack of affordable housing in the area.

2. In the EIR section on Land Use and Planning: LUP Impact 1 states that “The project would not include features that would physically divide an established community,” and therefore no mitigation is required. This is not an entirely truthful statement. The main issue is that this “island” will be part of Santa Maria while the “established communities” remain in unincorporated SB County with no say on the development and the impacts it will have.

PG-2

PG-3



If by the “established community” the project site is described, then no, it won’t since there’s nothing there now. However there are “established communities” both north and south of the project. The annexed land will be surrounded on three sides by county land whose residents will have no say in how the land is developed even though it will greatly impact them. While this is currently vacant land, it is part of the Housing Element Plan for the County and development is planned. Furthermore, Orcutt is an “established community” with a Community Plan, which guides development in Orcutt, and that would no longer apply, impacting future plans.

PG-3  
(cont'd)

3. Traffic: Both Hwy 135/Broadway and Union Valley are already heavily traveled by commuters north and south and east and west to access Hwys. 1 and 101. Adding to this with an estimated 500 residential units (equaling 2+ cars per unit) plus commercial space, gas station, a number of fast-food restaurants, etc., will greatly increase the congestion. Daily trips are estimated to be an additional 20,780 on average. There does not seem to be an adequate plan at this time to address this issue.

PG-4

Finally, the annexation of land should not rest solely on water rights. Unfortunately, Orcutt did not have the foresight to purchase water rights as Santa Maria did. The City should work with the County to work out an equitable plan for development that serves both entities. Annexation is not the answer.

PG-5

#### Comments on specific areas of the EIR:

##### Aesthetics

AES Impacts 1-3: The impacted area is “natural” but offers some visual feeling of space when viewed. Granted that with professional landscaping it will be more attractive, but the planned commercial and residential buildings will block views of the development and the only visual will be gates and walls.

PG-6

In Mitigation Measures section NOI/mm 1.2, noise walls to be construction along Union Valley Parkway are mentioned. While this may mitigate the noise to some extent, it will definitely negatively impact that sense of open space that one sees while traveling east on UVP.

##### Air Quality and Greenhouse Gas Emissions

AQ Impact 2: First of all, please define “short-term construction emissions.” There is nothing short-term about this construction project – either the length of daily hours of operation or the total time it will take to complete this project estimated at two years.

PG-7

While mitigation measures listed are helpful, there is no way that the air quality and greenhouse gas emissions will not increase due to the amount of vehicles involved in the construction. There are also many mitigation measures listed only to be followed by “where locally available,” “reclaimed water to be used whenever reasonably available,” etc. The measures listed that include this disclaimer should be investigated before stating in a report that this is a viable measure.

PG-7  
(cont'd)

Union Valley Parkway is a heavy traveled state highway with increased pollution during peak travel periods. Table 2.6 shows a construction timetable of two full years. It is wrong to say that adding construction equipment for an extended period of time both during the work day and cumulatively for the two-year project will not increase pollution even with these mitigation measures. There will also be an increase in noise pollution.

#### Biological Resources

Bio Impact 2: The climate in this area means that we have year-round Monarch butterflies, not just during the fall migration. These butterflies roost in the same habitat generation after generation so cutting down the eucalyptus trees at any time destroys their breeding spaces. Monarch butterflies are an endangered species, recognized by Congressman Salud Carbajal who recently helped to secure \$10 million in federal funding to protect this species.

PG-8

Bio Impact 4-5: How is any biologist going to be able to adequately survey an area for bird nests? Birds and bats, etc., don't nest where they are visible in order to protect their eggs and fledglings.

#### Land Use and Planning

LUP Impact 1-3: “The project would not include features that would physically divide an established community.” The mere annexation of this site will physically divide the established SB County community that surrounds it.

PG-9

#### Noise

NOI Impact 1: The project will definitely “generate a substantial temporary or permanent issue with ambient noise levels” no matter what mitigation efforts are in place.

PG-10

NOI/mm-1.1 – 1.2: While the noise may not exceed current standards, noise will become an issue both during and after construction. There are existing residential areas both north and south of this project, and no matter what steps are taken, the noise level will increase and impact residents' lives. Limiting the hours of operation to the commercial uses proposed, is not likely to match the needs of the businesses. To allow nighttime hours from 10pm-7am will definitely disrupt the lives of residents.

PG-10  
(cont'd)

#### Public Services and Recreation

PS Impact 3: EIR states that "implementation of the project would result in an increased demand on existing OUSD and SMJUHSD facilities" but that no mitigation is required. I understand that Righetti is already at 145% of capacity regarding number of students. Shouldn't this impact on area schools be addressed at this stage while development is still in the planning stage?

PG-11

Finally, although there are alternatives within the EIR, I do not think that any of these suggestions are in the public interest. I hope that you will come to understand that this annexation is not in the best interest of the established community that already exists in this area.

PG-12

Thank you for considering my comments.

Pam Gates

## 1.4.109.1 Response to Letter from Pam Gates

Comment No.	Response
PG-1	This comment is an introduction to the letter. Refer to MR-5, which responds to non-substantive comments.
PG-2	<p>The comment raises concern related to the proposed annexation of the project site and claims that the project would create a municipal island as the site is divided from the City by Highway 135. The comment also claims that the project site should not be considered within the City's SOI, and that the site should be developed according to the OCP.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. SBLAFCO has the discretion to approve or deny the proposal for annexation. The site is within the SOI previously approved by the SBLAFCO and the annexation of the project site would not create a municipal island.</p> <p>Refer to MR-17, which responds to comments related to land use consistency. SBLAFCO is responsible for establishing, amending, and updating SOIs for the cities within Santa Barbara County and is also responsible for identifying future service areas and jurisdictional boundaries. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997.</p>
PG-3	<p>The comment raises concern related to division of an established community; the commenter states that the annexation of the site would physically divide the established Santa Barbara County community that surrounds it. The comment also raises concern related to compliance with the OCP.</p> <p>The annexation of the site would not result in the physical division of an established community. As discussed in Section 4.9, development of land uses on the project site would likely be similar regardless of whether the project site is annexed into the city of Santa Maria or if the site were to remain in the County's unincorporated area. Further, the proposed project would not result in the creation of any significant physical barriers which would impede movement through the surrounding area, nor would the project result in the removal of any transportation infrastructure. Orcutt Road and UVP would still be accessible to residents of both Orcutt and Santa Maria. In addition, future development of commercial and residential uses onsite would serve city residents, residents of the community of Orcutt, and the general region. Therefore, the project would not physically divide an established community.</p> <p>Refer to response to comment PG-2, above, and MR-17, which responds to comments related to land use consistency.</p>
PG-4	The comment raises concern related to traffic. Refer to MR-3, which responds to comments related to traffic and transportation.
PG-5	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
PG-6	<p>The comment raises concern related to visual impacts and open space.</p> <p>Refer to MR-10, which responds to comments related to aesthetic resources, and MR-7, which responds to comments related to parks and recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>

Comment No.	Response
PG-7	<p>The comment raises concern related to air quality emissions. The commenter requests that "short-term construction emissions" be defined. The comment also specifically questions measures listed only to be followed by "where locally available," and similar. The commenter also opines that it is wrong to say that adding construction equipment for an extended period both during the work day and cumulatively for the two-year project will not increase pollution even with these mitigation measures.</p> <p>Short-term activities refer to activities that would not occur over the life of the project. Regarding construction activities, activities that occur less than five years are typically considered to be short term. Some mitigation measures include "where locally available" because hauling in reclaimed water or a specific piece of equipment from other areas of the state can potentially generate more emissions than using what is locally available.</p> <p>The project will generate pollution. However, the project would not result in ROG or NOx emissions above SBCAPCD thresholds and would be consistent with dust control requirements established by the SBCAPCD; therefore, construction-related impacts would be less than significant with mitigation.</p> <p>Refer also to MR-9, which responds to comments related to air quality and GHG emissions.</p>
PG-8	<p>The comment raises concern related to wildlife that use the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.</p>
PG-9	<p>The comment raises concern related to division of an established community; the commenter states that the annexation of the site would physically divide the established Santa Barbara County community that surrounds it.</p> <p>Refer response to comment PG-3, above.</p>
PG-10	<p>The comment raises concern related to noise.</p> <p>Mitigation measures have been identified in the EIR to reduce short-term construction and long-term operational noise impacts, including hourly limitations for construction activities in accordance with City of Santa Maria requirements. Refer also to MR-12, which responds to comments related to noise.</p>
PG-11	<p>The comment raises concern related to Public Services and Recreation. Refer to MR-2, which responds to comments related to public school facilities.</p>
PG-12	<p>The comment indicates that the commenter believes that none of the alternatives considered in the EIR are in the public interest and that annexation is not in the best interest of the established community that already exists in this area.</p> <p>This comment is not specifically on the EIR. These points are relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require revisions to the EIR or preparation of detailed responses in the Final EIR.</p>

## 1.4.110 Allicia King

**From:** Allicia King  
**To:** Dana Eady  
**Cc:** susan.bryant  
**Subject:** Re: Union Valley Parkway Annexation, Letter of Opposition  
**Date:** Tuesday, March 7, 2023 1:44:21 PM  
**Attachments:** image001.png  
image002.png  
23.03.07 UPDATE TO Union Valley Parkway - Letter of Opposition.pdf  
**Importance:** High

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Good Afternoon Dana,

Please find attached my revised letter. It includes additional concerns below the original letter, each are dated separately. This is in response to both LAFCO and the EIR.

I had originally redacted my name, after verifying with my employer, I have added it back in.

Please contact me with any questions. Thank you,

Allicia King  
805.345.6460

---

**From:** Dana Eady <deady@cityofsantamaria.org>  
**Sent:** Wednesday, February 1, 2023 10:55 AM  
**To:** Allicia King <allicia00@hotmail.com>  
**Subject:** RE: Union Valley Parkway Annexation, Letter of Opposition

Dear Ms. King,

Thank you for your comment letter on this project. I did want to confirm that you would like your letter included as comments on the Environmental Impact Report (EIR), which is the environmental review document that is currently out for public review. If so, I will add it to the other comments I have received so that it is included in the final document that is prepared.

The City has not received applications to develop the site which is why there are not specifics on the design aspects you mentioned. That information would all be required at the time that applications to develop the site are submitted (and could only be approved if the annexation is approved).

There is a conceptual plan for future development that is included in the EIR to analyze the environmental impacts should a future project be developed there. The different site plans you noted are called "project alternatives" and these are different scenarios for development of the site that were analyzed in the EIR. The purpose of the alternatives is to determine what types or scenarios for future development would have fewer impacts to the environment.

AK-1

I hope this helps to clarify some aspects of the project for you. Feel free to reach out to me if you have other questions.

Thank you,  
Dana



Dana Eady  
Planning Division Manager  
City of Santa Maria  
110 South Pine Street Suite 101  
Santa Maria, CA 93458  
Ph: (805) 925 -0951 Ext. 2444  
E-mail: [deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)



The City is updating the General Plan, please see the [website](#) for more information and how to get involved!

---

**From:** Allicia King <[allicia00@hotmail.com](mailto:allicia00@hotmail.com)>  
**Sent:** Wednesday, February 1, 2023 8:39 AM  
**To:** Dana Eady <[deady@cityofsantamaria.org](mailto:deady@cityofsantamaria.org)>  
**Subject:** Union Valley Parkway Annexation, Letter of Opposition

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Ms. Eady,

Please find attached letter of opposition for the city annexation of the union valley property AND for the proposed development. This is quite concerning, saddening, and confusing.

There are very few details about the proposed project, merely numbers of units proposed and square footage of commercial proposed. I could not find any indication of proposed heights above grade, number of stories, number of bedrooms, income limits, age restrictions, etc., (other than the soils report findings are based on the assumption the development will be 1 to 3 stories in height).

None of the provided site plans or graphics matched. They were all different and showed different concepts. What is really being proposed?

AK-1  
(cont'd)

3:30 on a Friday for Public Opinion for a development in the Orcutt area would really be better after 5pm in a location closer to the Orcutt area to ensure everyone who wishes to attend may do so.

None of this feels good. None of it. My letter is attached.

Thank you

↑  
**AK-1**  
(cont'd)



February 1, 2023

To Whom it May Concern,

I am vehemently opposed to this project as proposed. Our little town of Orcutt is disappearing each day through decisions made by the City of Santa Maria. We now have 4 storied building on the edge of the City and Orcutt over near Skyway and Waller Park, and a 5 storied senior housing complex on the border of Santa Maria and Orcutt (these are both under construction, both just as shocking when they started to go up). These new developments do not have appropriate buffers, are not visually pleasing, they are a single height for the entire development and do not get lower towards the edges to blend in with the surrounding area, they stick out like a sore thumb. These examples are located on City parcels, I don't understand placing high density in the middle of single-story housing: they tower, they change the feel, they block the hills – it's money grabs with very little thought for the areas they are being placed in. The concern is this proposed development would be much the same.

High density belongs downtown, near major transportation hubs, near already developed sources of shopping, grocery, and schools. I don't want a strip mall in my backyard with businesses that hop from one to the next, when a new one is built the old become vacant. The most recent development, Enos Ranch, is a travesty. No thought into building orientation, no thought into safe driveways in and out, no thought into a cohesive design – it's a hodgepodge of corporate design that will age faster than a kindergartener. It's all bad design.

I see Walmart is the property owner for the proposed development on Union Valley Parkway, or at least used to be. Residents of Orcutt have been fighting a Walmart development for nearly 20 years. It seems the owner has now turned to the City to circumvent the wants of those who live here. I have not spoken to one local that is excited or happy that this is happening; I have however, seen people nearly in tears discussing it.

The Geotechnical Report in the EIR indicates that the report was run assuming one to three storied construction throughout, based on the site plan, I'm highly suspicious that this is not the case. Our local school district will be impacted, parks, roads, and our community as a whole.

The benefits listed in the EIR (taxes, housing goals, etc) do directly benefit the City, ironically, if the parcels are not annexed and it's developed through the County (as it should be), the County benefits. Housing element numbers, as identified in the EIR, indicate this helps the City meet its housing numbers... the County has numbers to meet as well.

This development, as shown, is NOT compatible with the existing area. The draft plans give no indication to design style nor intent. The site plans are varied and do not match each other, it seems intentionally deceiving. There are no landscaped buffers depicted between residential and commercial uses, the areas labeled as parks are little more than a green breezeway between large apartment buildings. There will be no sun, but I'm sure there will be plenty of wind. **Orcutt is overseen by the North County Board of Architectural Review (BAR). This is a prime intersection for our community and its design should be reviewed, and potentially improved, by the local BAR (should it unfortunately be approved).**

Sincerely,  
Allicia King, Orcutt Resident

AK-2

AK-3  
IAK-4

AK-5

AK-6

March 07, 2023

Additional Items to be addressed:

1. Established eucalyptus grove that we see large birds going into and out of all the time: **Vultures, hawks**, etc. Eucalyptuses are also known to be the home of the **endangered Monarch Butterfly**. Monarch numbers have declined drastically in the past few years and it is important to retain as much of their preferred habitat as possible.
2. The proposal to annex this keysite from the community of Orcutt creates a **non-continuous annexation, a peninsula extending into the Orcutt community**. This development would not serve the residents of Santa Maria; it would serve the residents of Orcutt and should be developed under the guidance of the Orcutt Community Plan by the County. It should be regulated by the county, taxed by the county, housing numbers should go to the county. The city should not be cherry picking prime locations to develop under the guise of sphere of influence. This does nothing more but remove tax funds from the county to maintain infrastructure for the community of Orcutt.
3. Mass Transportation is virtually non-existent, even if further developed our bus system is just not a good option if you need to get somewhere on time. This will create terrible traffic congestion and pollution to this area caused by vehicular traffic. It is already congested during commute hours.
4. Safe biking paths and walking routes should be provided from the community this serves to new homes and retail components of this development. You cannot safely walk from this site to ANY housing located within the boundaries of the City of Santa Maria. The closest homes are located just north of Waller Park on Waller lane west of 135. **A walking path from these homes to this project site would require that an individual walk along highway 135, for 40 minutes.**
5. Emergency services will be greatly impacted. The county is paying for a new fire station to be building on Union Valley Parkway to serve the Orcutt community. This would be the responding department for any emergencies that occur on this site, this will not fall under the watch of the city of Santa Maria, their departments are just too far away. This applies to all modes of emergency services, including the Sheriff's department.
6. The Geotechnical Report in the EIR indicates that the report was run assuming one to three storied construction throughout, based on the site plan, I'm highly suspicious that this is not the case and that taller structures will be needed to hit the density numbers as stated. Orcutt has its own density and height guidelines. Our keysites have been vetted over time and time and again and we have a plan in place for development of these properties. There is no reason the development of this site cannot be developed by navigating the appropriate channels and work with the county for development.
7. Air traffic noise. This is monitored, loosely, by the Santa Maria Airport District. They sell time to military aircrafts who practice taking off and landing for hours on end at the airport. They often do not abide by flight zones or noise restrictions. These operations sometimes happen at night. The EIR did not address, specifically, aircraft noise from military training flights.
8. The EIR did not assess the impact on our local schools. The children that live in these proposed homes will be enrolling in the Orcutt Union School District. This would put a large strain on our local school sites in various forms, including: Traffic, bus services, and classroom sizes.

It is important to note this site is bordered by highway 135 to the west, to the north Orcutt homes, to the east Orcutt homes, to the south Orcutt homes. On the other side of 135 the city

AK-7

AK-8

AK-9

AK-10

AK-11

AK-12

AK-13

AK-14

AK-15

owns a very skinny parcel of land that is run by the Santa Maria Airport District, it will never be developed into homes due to its proximity to the airport. NEVER. The closest resident of the city of Santa Maria is at least a 40 minute walk from this site. Waller lane is 2 miles away, a 40 minute walk along 135; and in the other direction, to reach McCloud (the nearest homes located within City limits) is 2.7 miles and 48 minute walk. (All distances and walking times derived from Google Maps).

↑  
AK-15  
(cont'd)

## 1.4.110.1 Response to Letter from Alicia King

Comment No.	Response
AK-1	<p>This comment refers to missing project details and inconsistent site plans and graphics depicting different concepts and asks what is really being proposed.</p> <p>As described in Chapter 2, Project Description, a conceptual plan for future development of the project site has been prepared to evaluate potential environmental impacts of the eventual development of the site if the proposed annexation and pre-zoning were to be approved. The conceptual development plan includes retail commercial, mini-storage, and high-density residential uses (Figure 2-3). This conceptual plan shows the potential future development that could occur consistent with the project's proposed pre-zone designations. The conceptual development plan would allow a maximum buildout of 106,800 square feet of commercial uses on 16.35 acres of the project site, as well as 400 apartments and 95 townhomes on the remaining 27.40 acres.</p> <p>This EIR is intended to expedite the processing of future projects that are consistent with the zoning and consistent with the analyses and findings of this EIR. Therefore, though the specific details of future developments within the project site are not currently known, this EIR evaluates a reasonable maximum development scenario that would be allowed, as illustrated in the conceptual development plan (see Figure 2-3). Future project buildout of any of these uses within the project site would require individual Planned Development Permit applications for development of each of the proposed residential and commercial projects. These applications would be discretionarily reviewed by the City at the time they are received to ensure they are consistent with the zoning and have been adequately evaluated under CEQA.</p> <p>If the proposed annexation is approved, and if and when considering subsequent development proposals, the City determines that a proposed development would be consistent with the uses described in the EIR and would not result in new or more severe significant environmental effects or require additional mitigation, the City could approve the project without additional environmental review. However, if there are significant changes proposed that are not consistent with the approved zoning or the type and level of development analyzed in this EIR, and the City concludes that these may result in new significant environmental impacts, additional environmental review would be required consistent with the requirements of the State CEQA Guidelines Sections 15162 through 15164.</p>
AK-2	<p>The comment raises concern related to visual impacts. Refer to MR-10, which responds to comments related to aesthetic resources.</p>
AK-3	<p>The comment raises concern regarding the Geotechnical report prepared for the project.</p> <p>Refer to MR-18, which responds to comments related to the Geotechnical Report and geology and soils. As discussed in Section 4.6, Geology and Soils, all future development within the project site would be subject to the CBC, which requires buildings, building foundations, and any other associated structures to be constructed to withstand earthquake loads, including liquefaction. Future buildout of the project would also be required to comply with the building and design measures included in the Geotechnical Engineering Report and associated reports prepared by Earth Systems Pacific for the project, as detailed in Mitigation Measures GEO/mm-2.1, GEO/mm-2.2, GEO/mm-2.3, GEO/mm-3.1, GEO/mm-3.2, GEO/mm-3.3, GEO/mm-5.1, and GEO/mm-6.1. Mitigation Measure GEO/mm-6.1 has been identified to require the developer to retain a qualified Geotechnical Engineer to provide consultation during the design phase, to aid in future project design consistent with the Geotechnical Engineering Report, to review final plans once they are available, to interpret this report during construction, and to provide construction monitoring in the form of testing and observation. In addition, future buildout of the project would be required to comply with all applicable CBC standards, including Section 1613 of the CBC to reduce or avoid risk associated with development on potentially unstable soils, including liquefaction. The project would also be required to implement Mitigation Measure GEO/mm-2.3, which requires measures for building foundations to be implemented into future project design criteria to reduce the risk of collapse or other damage due to unstable geologic conditions.</p>
AK-4	<p>The comment raises concern related to public schools, parks and recreation, and roads. Refer to MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to traffic and transportation, and MR-7, which responds to comments related to parks and recreation.</p>
AK-5	<p>The comment raises concern related to taxes and achieving the County's RHNA goals.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p>

Comment No.	Response
AK-6	<p>The comment raises concern related to visual impacts, parks, and land use consistency.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p> <p>Additionally, as shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Park and open space areas within the project site would be considered as part of the overall project development and would not result in physical impacts on the environment outside of those described in this EIR. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>Potential environmental impacts associated with the provision of public park facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary. Refer also to MR-7, which responds to comments related to recreation and open space.</p>
AK-7	<p>The comment raises concern related to wildlife that utilize the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.</p>
AK-8	<p>The comment raises concern related to the proposed annexation of the project site and claims that the project would create a municipal peninsula. The comment also claims that the project site should not be considered within the City's SOI, and that the site should be developed according to the OCP.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. SBLAFCO has the discretion to approve or deny the proposal for annexation. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island. SBLAFCO is responsible for establishing, amending, and updating SOIs and city limits for the cities within Santa Barbara County. The project site and much of the surrounding area was previously determined to be within the City's SOI by SBLAFCO.</p> <p>Additionally, refer to MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
AK-9	<p>The comment raises concern related to public transportation. Refer to MR-3, which responds to comments related to traffic and transportation.</p>
AK-10	<p>The comment raises concern related to the availability of pedestrian facilities.</p> <p>Refer to MR-7 which responds to comments related to parks and recreation. Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p> <p>Further, the distance or route residents would take to walk to other residences within City limits is not considered an environmental consideration that is within the scope of a CEQA analysis. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
AK-11	<p>The comment raises concern related to the provision of emergency services.</p> <p>Refer to MR-1, which responds to comments related to emergency services. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>

Comment No.	Response
AK-12	<p>The comment raises concern regarding the Geotechnical report prepared for the project.</p> <p>Refer to response to comment AK-3, above, and MR-18, which responds to comments related to the Geotechnical Report and geology and soils.</p>
AK-13	<p>The comment raises concern related to air traffic noise associated with Santa Maria Airport.</p> <p>Refer to MR-4, which responds to comments related to airport hazards and MR-12, which responds to comments related to noise. Regarding noise associated with aircraft, the EIR considers the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour, which includes considerations for military operations. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant.</p> <p>It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports.</p>
AK-14	<p>The comment raises concern related to public school facilities and traffic. The comment also claims that the EIR did not analyze impacts to schools.</p> <p>Refer to MR-2, which responds to comments related to public school services, and MR-3, which responds to comments related to traffic and transportation. Section 4.12, Public Services and Recreation, evaluates the project's potential impacts related to public services and recreation, including existing school facilities. Section 4.12.1.3 identifies the condition of existing schools in the project area. As recently upheld in Santa Rita Union School District v. City of Salinas (2023) Cal.App.5th Court of Appeal, where information from school districts is uncertain and/or vague there is not an ability to further analyze the potential indirect impacts of future school facility development. These effects cannot be further analyzed or responded to per State Guidelines Section 15145. The school districts have not provided any substantial evidence or information regarding future school sites or any reasonably foreseeable indirect environmental impacts of providing school facilities on existing or future school sites.</p> <p>Therefore, in conjunction with other plans and funding sources used by the school districts, the payment of the state-mandated impact mitigation fees would ensure that the effects of the project on the provision of school services would be less than significant. Based on the information provided in the Draft EIR and this supplemental information, potential environmental impacts associated with the provision of public school facilities have been adequately evaluated in the EIR, and no revisions to the EIR are necessary.</p>
AK-15	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.111 Constance King

To Whom It May Concern,

I am writing this letter to express my OPPOSITION to the city of Santa Maria's proposed annexation of Keystone 26, the Richards Ranch Project.

I have lived in the Orcutt area for over 60 years. I am concerned with the constant efforts of the city of Santa Maria to surround and annex the Orcutt area. Following are some of the reasons that I oppose this attempted annexation:

- *Traffic* is a major concern - currently the roads are already overcrowded with more and more accidents occurring in this area-the proposed strip mall and housing will just exacerbate this situation
  - Island creation .. annexation of this property creates an island in the middle of the Orcutt area...this island will rely on the resources provided by the Orcutt community, roads, schools, ambulance service, health services and recreational areas which are already lacking. The land is located along side highway 135 which separates it from the airport and ag lands under the cities influence
- *Emergency Services* our sheriff staff is currently understaffed ..this will put more stress on the sheriff and all emergency services
- *Noise pollution* .. safety.. the land is located by the airport...the proposed annexation will be located under exceptionally busy flight paths-the airport is currently handling personal, commercial and military aircraft. The military aircraft include craft from jets to helicopters. The noise from these aircraft often make hearing in one's home or backyard impossible.
- the air quality will be affected by the increase in cars and homes in the area.
- *Air pollution*
- *Public transportation*-There is no convenient, public transportation
- *Keysite 26* is home to a large grove of trees...these trees are home to the monarchs which we know are near becoming declared an endangered species. It is also a nesting area for our local hawks and vultures.
- *Recreation* - we do not have enough recreational area as it is - this will make it more difficult to find hiking, ball fields
- THIS ISLAND WILL BE PLACED IN THE MIDDLE OF ORCUTT WITH NO REPRESENTATION FOR THE PEOPLE OF ORCUTT
- *Efficiency* -what the city of Santa Maria has planned for this area could be done more efficiently elsewhere in a contiguous section of Santa Maria
- *Strains* on our schools
- *Existing Plan* The Orcutt community has a well-developed plan. This plan and the wishes of the people in Orcutt are being ignored.

THIS ISLAND WILL BE PLACED IN THE MIDDLE OF ORCUTT WITH NO REPRESENTATION FOR THE PEOPLE OF ORCUTT

These are some of the reasons I am submitting to support my OPPOSITION to the annexation of Richards Ranch, Keysite 26.

Please take these environmental concerns into consideration and deny the annexation of this property

Sincerely,  
Constance King

CK-1

CK-2

CK-3

CK-4

CK-5

CK-6

CK-7

CK-8

CK-9

CK-10

CK-11

CK-12

CK-13

## 1.4.111.1 Response to Letter from Constance King

Comment No.	Response
CK-1	The comment raises concern related to the proposed annexation of the project site. Refer to MR-8, which responds to comments related to annexation and economics.
CK-2	<p>The comment raises concern related to traffic congestion and safety, schools, recreation, and public services. The comment also claims that the project would result in a municipal island.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only.</p> <p>Refer also to MR-2, which responds to comments related to public school facilities, MR-7, which responds to comments related to parks and recreation, Refer to MR-8, which responds to comments related to annexation and economics, MR-15 which responds to comments related to population growth and other public services, and MR-17, which responds to comments related to land use consistency. The project site is bordered by City of Santa Maria city limits to the west. Therefore, annexation of the project site would not create a municipal island. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
CK-3	The comment raises concern related to the provision of emergency services. Refer to MR-1, which responds to comments related to emergency services.
CK-4	<p>The comment raises concern related to noise and airport hazards.</p> <p>Refer to MR-4, which responds to comments related to airport hazards and MR-12, which responds to comments related to noise. Regarding noise associated with aircraft, the EIR considers the number of aircraft operations by each type of aircraft to be in use at the airport, the percentage of day versus night operations, the distribution of takeoffs and landings for each runway direction, and flight tracks. The proposed project would not involve the use of aircraft, would not affect existing or projected future airport operations, nor would the proposed project result in the location of noise-sensitive land uses (e.g., residential dwellings) within the airport's 60-dBA CNEL noise contour. In addition, proposed commercial development would not be located within the projected 65 dBA CNEL noise contour. For these reasons, this impact was considered less than significant.</p> <p>It is important to note that although aircraft overflights were included in the noise contours developed for Santa Maria Airport, the individual sensitivity to aircraft overflights varies from one person to another. In recognition of this fact, the Santa Maria Airport's ALUCP includes overflight compatibility policies to help notify community residents about the presence of overflights near airports.</p>
CK-5	The comment raises concern related to air quality emissions. Refer to MR-9, which responds to comments related to air quality and GHG emissions.
CK-6	The comment raises concern related to public transportation. Refer to MR-3, which responds to comments related to the traffic and transportation.
CK-7	The comment raises concern related to wildlife that utilize the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.



Comment No.	Response
CK-8	<p>The comment raises concern related to recreation.</p> <p>Refer to MR-7, which responds to comments related to recreation and open space. As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. It is also not possible to provide details regarding possible walking trails or paths within the development. However, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p> <p>At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p> <p>Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
CK-9	<p>The comment raises concern related to the proposed annexation of the project site, and again states that the project would result in a municipal island.</p> <p>Refer to response CK-2, above, and MR-8, which responds to comments related to annexation and economics.</p>
CK-10	<p>The comment raises concern regarding annexation and suggests a different location for the project site.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Section 5.3.3 of Chapter 5, Alternatives Analysis, considers whether an alternative location should be evaluated within the context of the EIR and the requirements of CEQA. As discussed therein, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant. As described in Section 5.3.3, there are no suitable alternative sites within the control of Richards Ranch, LLC (the Applicant). Given the nature of the project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts. Therefore, an alternative location was considered but rejected from further consideration in the alternatives analysis in the EIR; revisions to the EIR are not necessary in response to this comment.</p>
CK-11	<p>The comment raises concern related to public school facilities. Refer to MR-2, which responds to comments related to public school services.</p>
CK-12	<p>The comment raises concern related to compliance with the OCP.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
CK-13	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.112 Vance and Jerrilyn Matzke

**From:** [Vance Matzke](#)  
**To:** [Dana Eady](#)  
**Subject:** Richards Ranch Annexation/EIR  
**Date:** Tuesday, March 7, 2023 2:57:42 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Re: Richards Ranch Annexation/EIR

We are opposed to the annexation of Richards Ranch property at Union Valley Parkway and Orcutt Road into the City of Santa Maria. This area has long been a part of the Orcutt community and Key Site 26 in the Orcutt Community Plan.

VJM-1

The developer's high-density plan for 400 apartments, 95 townhomes, plus retail establishments will result in crowded conditions, unlike the surrounding neighborhood with individual homes. Businesses that enter and exit from Orcutt Road will make that unsafe. Traffic on Union Valley Parkway is already a problem and all of the additional traffic from the new residents will put additional stress on it.

VJM-2

Long-time residents of Orcutt purchased homes in Orcutt (not Santa Maria) for a reason—they liked the more rural, less crowded area. Annexing this area into the city of Santa Maria will take that away from them. New residents will attend Orcutt schools and use the parks, trails, and other amenities in the area while the project doesn't appear to be giving anything to current Orcutt residents. Most of the streets in the area were built to service the neighborhood with low-density housing. We are also concerned about the overflow parking that could occur.

We strongly oppose the annexation of the Richards Ranch property into the City of Santa Maria. Any development in this area should be consistent with the community.

VJM-3

Respectfully,  
Vance and Jerrilyn Matzke  
368 Mooncrest Lane

### 1.4.112.1 Response to Letter from Vance and Jerrilyn Matzke

Comment No.	Response
VJM-1	<p>The comment raises concern related to the proposed annexation of the project site and compliance with the OCP.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-17, which responds to comments related to land use consistency. It should also be noted that the OCP is almost 25 years old, having been originally adopted in 1997. Several amendments have taken place since its adoption, including rezoning the entire site to a retail commercial (C-2) zoning.</p>
VJM-2	<p>The comment raises concern related to traffic, public schools, emergency services, parks, population growth, parking, and other public amenities.</p> <p>Refer to MR-1, which responds to comments related to emergency services, MR-2, which responds to comments related to public school facilities, MR-3, which responds to comments related to transportation and traffic, MR-7, which responds to comments related to parks and recreation, and MR-15, which responds to comments related population growth and other public services.</p> <p>Section 4.12, Public Services and Recreation, provides an evaluation of the project's potential impacts to libraries. The project would be subject to payment of the City's growth mitigation fees as required by City Municipal Code Section 8-15 to provide funding for facilities as needed, which would offset the project's increased demand on public facilities. These fees provide for the funding of acquisition, design and construction of public facilities and related equipment necessary to serve new development within the City. Recently, approximately \$5 million has been set aside to acquire and retrofit a new site for the Orcutt Library in order to provide expanded library access to the community. These funds consist of \$2 million in federal funding, \$2 million in community donations, and roughly \$1 million from other sources including Santa Barbara County (Santa Maria Times 2022).</p> <p>In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
VJM-3	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.113 Andrew Oman

**From:** [Andrew Oman](#)  
**To:** [Dana Eady](#)  
**Subject:** Comments on Proposed Richard's Ranch Annexation  
**Date:** Tuesday, March 7, 2023 2:03:10 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear City Council:

I am writing today to oppose the City of Santa Maria's proposed annexation of what is being called the Richards Ranch property. I have a number of grave concerns regarding this proposal, yet I will try to keep my comments brief.

1. The city wants to grow, but this is the wrong way to do it. While I understand the city's desire to grow and build its tax base, it is wrong to create a peninsula of city development surrounded by county residents who will be impacted by this development yet have no way to hold the city accountable for problems that may arise.

AO-1

2. While I understand that the drawings depicting the potential development in the Draft EIR are not final, the density depicted in these drawings is ridiculous. I moved into this area before Union Valley Parkway was completed, and I understand that the area will be developed. I also understand that a landowner like this just wants to find a way to milk as much money as they can out of a project. Still, the depicted three drive-throughs on the two small triangles at the intersection of 135 and UVP are potentially very dangerous. I expect that there will be cars trailing into the street as I have seen at other drive-throughs in the area, creating traffic concerns at an already dangerous intersection. How many hours a day will cars sit there, idling? I drive through that intersection at least twice a day on my way to work in Santa Maria.

AO-2

3. Due to the proposed level of development, the added traffic at the intersection of Hummel and UVP will require a full traffic signal to be installed at that intersection, even if that area is not part of the development. Already, that area is dangerous as people streak across those lanes. Several times, I have witnessed drivers on UVP ignore the pedestrian signal - how much worse will that be with this development? The entire area should be under one jurisdiction - the city or the county - so that there is a comprehensive plan to addressing traffic and other environmental issues.

AO-3

4. There are a number of large eucalyptus trees in the area that are habitat for butterflies, and I believe this development would be a serious degradation to that habitat. Walking by this property, I have seen rabbits and coyotes and many other species. Again, I know it will be developed, yet it should be developed in a way that minimizes the impact on the environment and the neighbors. This plan seems to simply be maximizing the impact on the owners bank account and the city's coffers.

I have seen that there is a city "sphere of influence" that includes this property and all of Orcutt. A logical plan would be annex it all, if the city is to grow. That is not what I want, that is not what the city wants, but at least it is logical. The same could be said if the city annexed everything north of Union Valley Parkway. Yet, if you did that, you would annex in many voters who would be unhappy with you, so you won't do that. To pick this one area to annex is undemocratic in the extreme.

AO-4

This proposed annexation is a peninsula, connected to the city only by the uninhabited airport property across Highway 135. It is simply wrong that the city would intensely develop this peninsula of property surrounded by county residents that have no direct way to hold you accountable. This action would deprive the people of the appropriate amount of influence on this important development.

In my work there is a saying: "If you are not at the table, you are on the menu." If you allow this to move forward, you have definitely put me and my neighbors on the menu.

AO-5

Andrew Oman

(Contact information for verification and not for public release)

### 1.4.113.1 Response to Letter from Andrew Oman

Comment No.	Response
AO-1	<p>The comment raises concern related to the proposed annexation of the project site and claims that the project would create a municipal peninsula.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p> <p>SBLAFCO has the discretion to approve or deny the proposal for annexation and would take into consideration whether the city boundaries resulting from the proposed annexation would be appropriate. The concern raised regarding the shape of City limits does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
AO-2	<p>The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to the transportation system.</p>
AO-3	<p>The comment raises concern related to wildlife that utilize the project site. Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly.</p>
AO-4	<p>The comment raises concern related to the proposed annexation of the project site and the City's SOI.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics, and MR-17, which responds to comments related to land use consistency. SBLAFCO is responsible for establishing, amending, and updating SOIs and city limits for the cities within Santa Barbara County. The project site and much of the surrounding area was previously determined to be within the City's SOI by SBLAFCO.</p>
AO-5	<p>The comment is a conclusion to the letter, emphasizing that the commenter does not support the project.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>

## 1.4.114 Katy Rogers

**From:** [Katy Rogers](#)  
**To:** [Dana Eady](#)  
**Subject:** Comments on Draft EIR - Richards Ranch Annexation Project (AN2021-0001)  
**Date:** Tuesday, March 7, 2023 5:02:01 PM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

Dear Ms. Eady,

Thank you for accepting comments on the draft EIR for the Richards Ranch Annexation. As an Orcutt community member and living in the Hummel/Mooncrest area, I have concerns about the neighborhood compatibility of this development. Specifically to the EIR, I have the following questions that I would like the agency to address and respond to.

- How did they come to the number of accidents at Hummel and Union Valley Parkway? Being that I pull out in that specific intersection every day, multiple times per day, I can tell you that there are more than 5 recent accidents there. I have witnessed one myself. I've even looked into petitioning for a stoplight at the location - especially due to the amount of children that walk to school through that intersection. This development would definitely increase the amount of traffic and therefore potential accidents without widening to four lanes and adding a stoplight.
- Union Valley Parkway needs to be four lanes all the way from Bradley to 135/Broadway in order to support the increased traffic of this project. I don't believe that would even be enough, but at a minimum that would need to happen. The amount of traffic during commute/school drop off/pick up is already burdensome - adding 400 apartments and 95 townhomes is going to cause even more congestion during those peak times.
- 3-4 Drive throughs are going to cause a traffic backlog into already busy streets. If you look at Starbucks or Orcutt Burger on Bradley, anytime they are busy and delayed in service, those drive through lines back up into the street causing stopped traffic. Plus, drive throughs are not sustainable for the environment - they should consider eliminating them.
- As a nearby resident, the public safety response concerns me. I understand that LAFCO is using this as a point to support annexation into the City, but I don't agree that annexation of the property is in the best interest of the community.
  - Per NOP response letter from Deputy Chief Rob Heckman dated February 25, 2022 Mr. Heckman states *"At this time the SBCFD does not believe the proposed project is in the best interest of the residents and property owners of the unincorporated Orcutt community and has the potential to result in a significant negative impact to public safety."*

I have many concerns about this project. I am not in favor of annexing the property into the city and would prefer it stay in the County with the existing Orcutt Community plan. My general thoughts are:

- Where are the children from all of these new families going to attend school? I have a four year old and I'm already having a hard time getting him into school.
- There's not enough water to support existing neighborhoods and landscape
- If the development were to move forward, how can a public park with a playground be included and replace some of the commercial retail? I

KR-1

KR-2

KR-3

KR-4

IKR-5

↓ KR-6

understand that doesn't make the developers money, but it would go a long way in engaging the community and neighborhood in the project.

- How can we protect the existing groves of trees where the Monarch butterflies migrate and other wildlife, including the foxes and coyotes, that live there?
- There are so many vacancies in nearby commercial developments. How do they expect to fill these places consistently?

┌ KR-6  
└ (cont'd)

┌ KR-7

┌ KR-8

Thank you again for collecting comments.

Best,

Katy Rogers  
[k.westgaard@gmail.com](mailto:k.westgaard@gmail.com)

## 1.4.114.1 Response to Letter from Katy Rogers

Comment No.	Response
KR-1	<p>The comment raises concern related to an increase in traffic congestion and safety and opines regarding the appropriateness of the fast-food drive throughs included in the proposed project.</p> <p>Refer to MR-3, which responds to comments related to traffic and transportation. The accident analysis provided in the Traffic and Circulation Study (Appendix E of the EIR) is based on the most recent 3 years of accident data available when the traffic study was initiated. Additional data was requested from the California Highway Patrol for the most recent 3 years period (October 1, 2018 to October 18, 2023) at the UVP/SR-135 intersection. The most recent data shows 29 collisions in the 3-year period. The accident rate calculated was 0.71 accidents per million entering vehicles, which is higher than the California State average collision rate of 0.55 for similar intersections. The Caltrans significance test was performed and determined that the number of accidents to be statistically significant is 36 accidents within the 3-year period, thus the 29 accidents during the 3-year period is less than significant. Among the roadway improvements and intersection improvements that would be a part of the project is the signalization and improvement of UVP and Hummel Drive. The signalization of UVP and Hummel Drive would occur in Year 1 of the development, prior to the full buildout of the project. Further, as noted in Chapter 3, Project Description, Dancer Avenue is not proposed to be used for vehicular access to and from the project site but could be used for emergency access only.</p> <p>In addition, in response to the commenter's concerns regarding the appropriateness of the land uses proposed, the concerns raised could be relevant for consideration by the City's decision-making bodies in their consideration as to whether to approve or deny approval of the project. As such, they have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
KR-2	<p>The comment raises concern related to the provision of emergency services and includes a quote from the NOP comment letter submitted by SBCFD.</p> <p>Refer to MR-1, which responds to comments related to emergency services. It should be noted that the SMFD recently received approval and funding to fully staff SMFD Station 6 to serve calls beyond the Santa Maria Public Airport.</p>
KR-3	<p>The comment raises concern related to the proposed annexation of the project site. Refer to MR-8, which responds to comments related to annexation and economics.</p>
KR-4	<p>The comment raises concern related to public school facilities.</p> <p>Refer to MR-2, which responds to comments related to public school services. The schools that would serve the project site include Patterson Road Elementary School and Orcutt Junior High School, which are within the OUSD, and Ernest Righetti High School, which is within the SMJUHSD.</p>
KR-5	<p>The comment raises concern related to water supply.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p>
KR-6	<p>The comment raises concern related to provisions of recreational facilities, including parks.</p> <p>Refer to MR-7, which responds to comments related to parks and recreation. As shown on Figure 2-3 in the EIR, the project shown in the conceptual site plan would include several internal pocket park areas intended for use by future residents. Given the conceptual nature of the project's development plan, specific details about the exact size and types of park and open space features on-site are not known at this time. Additionally, as a condition of approval, the proposed project would pay the required parkland development fees pursuant to City of Santa Maria Municipal Code Section 19-9.05 and growth mitigation fees pursuant to Municipal Code Section 8-15 to maintain and grow the City's park system.</p>



Comment No.	Response
KR-7	<p>The comment raises concern related to wildlife that utilize the project site and associated habitat, including foxes and monarch butterflies.</p> <p>Refer to MR-11, which responds to comments related to biological resources including those related to the monarch butterfly. As discussed in Section 4.3 of the PRDEIR and this Final EIR, a significant impact related to biological resources would occur if the proposed project would result in the temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species. Special-status species include those that have been designated as rare, threatened, or endangered, as well as those which are candidate species for listing. Section 4.3.1.6 Special-Status Plant Species and 4.3.1.7 Special-Status Wildlife Species discuss these designations in more detail. Based on the special-status species assessment, it was determined that three special-status wildlife species (monarch butterfly, northern California legless lizard, and western red bat) and nesting migratory birds and raptors could potentially occur on the project site (DWE 2022). Other common species are known to use the project site; however, the project site is generally surrounded by urban residences and the SR 135 corridor. As such, it has been concluded that minimal quality habitat for locally common wildlife species, including foxes; as such, impacts to foxes would not be considered significant.</p>
KR-8	<p>The comment raises concerns related to other nearby commercial developments. Refer to MR-5, which responds to non-substantive comments.</p>

## 1.4.115 Eric Wilson

**From:** Eric Wilson  
**To:** Dana Eady; lafco@sblafco.org  
**Subject:** Fwd:  
**Date:** Tuesday, March 7, 2023 8:52:31 AM

\*\*\* EXTERNAL EMAIL: Please use caution when opening links or attachments.\*\*\*

----- Forwarded message -----

**From:** Eric Wilson <[eric.wilson@gavial.com](mailto:eric.wilson@gavial.com)>  
**Date:** Tue, Mar 7, 2023 at 8:39 AM  
**Subject:**  
**To:** Eric Wilson <[eric.w.wilson77@gmail.com](mailto:eric.w.wilson77@gmail.com)>

In Dear Members of LAFCO,

We the citizens of Orcutt are quite alarmed that the City of Santa Maria is attempting to incorporate Richard's Ranch into the city - forty three plus acres of Orcutt heartland, located at Union Valley Parkway and Orcutt Road.

EW-1

Over the past 20 years Orcutt has grown tremendously for a small town. We have seen many housing projects take place eliminating the open spaces that make Orcutt what it is.

Just as alarming is the fact NOTHING has been done for our youth! We once had a bowling alley which is now Albertsons.

EW-2

The schools are overcrowded, once was student parking is now portable classrooms. That puts a tremendous strain on the neighboring houses with regards to parking.

EW-3

Crime is out of control, criminals know Orcutt is an easy target.

EW-4

Adding more houses without adding to the infrastructure first is insane.

EW-5

The purposed annexation of the Union Valley Parkway Will create a huge impact on traffic.

EW-6

I agree with the fowling from another Orcutt resident.

The City of Santa Maria claims that this property is in their sphere of influence yet it is separated by California State Highway 135. Their connection appears to be farmland controlled by and in close proximity to the Santa Maria Airport – a common sense “NO BUILD” due to airplane traffic. Equally insulting to the citizens of Orcutt is the City of Santa Maria’s contentions that most of Orcutt is in the city’s sphere of influence. Orcutt cannot

EW-7

allow Santa Maria to cherry pick prime Orcutt real estate.

Richard's Ranch (a project consisting of 400 apartments, 95 townhomes and a retail commercial center) is located on Key Site 26, an integral part of the Orcutt Community Plan. This plan was adopted in 1997 by the Santa Barbara County Board of Supervisors. The Orcutt Citizen's Advisory Committee played the major role in creating this plan – after all it is our home. All 34 Key Sites in the Orcutt Community Plan work together. Any changes to this plan need to be done by the citizens of Orcutt.

The City of Santa Maria wants to annex this property for two reasons – tax revenue and state housing mandates, at Orcutt's expense.

If the city did not want the tax dollars from the retail/commercial aspect of this project they would sell the developer supplemental water and the project would be built under the guidelines of the Orcutt Community Plan.

The project would be built with oversight and input from our County Supervisor, the Santa Barbara County Building and Planning Department, the Architectural Review Board and Orcutt citizens.

No doubt that the apartment dwellers in this project will use Orcutt's resources in abundant fashion – schools, law enforcement, fire & rescue, parks, recreation, trails and roadways will be overwhelmed at the expense of Orcutt citizens – taxation without representation. Orcutt's limited medical resources will be further taxed.

Orcutt's roads are in poor condition compared to Santa Maria's roads. Trees line Santa Maria roads, where trees along Orcutt roads are sparse. Orcutt roads will only get worse with this influx of traffic.

Santa Maria controls Orcutt's water. Every time Orcutt has the opportunity for a significant commercial development (needed to support cityhood) Santa Maria plays the "Monopoly Water Card", refusing to sell supplemental water to Orcutt projects - but happy to annex and bankroll the city. Ironically, Orcutt has a vast supply of underground water.

In the 1980's the Santa Barbara County Board of Supervisors (Including Orcutt's Supervisor who later served on the Santa Maria City Council) decided that Orcutt did not need state water. Santa Barbara County's modus operandi was to control growth with water.

EW-7  
(cont'd)

The State of California in mandating affordable housing. The City of Santa Maria and the County are going to Orcutt to meet their allocations, when Orcutt has its own allocations.

With Orcutt's median household income of \$95,916 and Santa Maria's median household income of \$67,634, per capita Orcutt exceeds (expenditures & taxes) Santa Maria by forty two percent.

With more expendable income Orcutt has exponentially supported Santa Maria's economy - Costco, Home Depot/Lowes, car dealerships, big box stores, hospitals etcetera. Santa Maria reaps the benefits via taxes without providing any services.

Orcutt's Veteran population per capita is more than double that of Santa Maria yet Orcutt has no Veterans Memorial Building. Much smaller cities in Santa Barbara County have Veterans Memorial Buildings including Solvang, Carpinteria and Guadalupe.

Santa Maria tore down their historical downtown and built a shopping mall that continually struggles to survive. Orcutt residents assembled forming a non-profit "Old Town Orcutt Revitalization Association" that successfully transformed Old Town Orcutt into a thriving historical downtown.

The City of Santa Maria's sales tax rate is 8.75%. If Santa Maria is allowed to annex this property Orcutt residents will pay the higher sales tax rate and not Orcutt's rate of 7.75%.

We are assembling a group of Orcutt folks to Incorporate Orcutt, California – established 1904. If successful, Orcutt would become the third largest city in Santa Barbara County - larger than Guadalupe, Buellton, Solvang, Carpinteria, Goleta and Lompoc.

EW-7  
(cont'd)

## 1.4.115.1 Response to Letter from Eric Wilson

Comment No.	Response
EW-1	<p>The comment raises concern related to the proposed annexation of the project site and the elimination of open space.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics and MR-7, which responds to comments related to parks and recreation. Additionally, it should be noted that the project site is privately owned. While it may have been used informally for open space and recreational opportunities, it is not a publicly owned or designated open space or recreation facility. Local governments are required to allow reasonable development of private land. Prohibition of development would be considered a regulatory taking, which occurs when government regulations such as zoning ordinances and general plan requirements significantly diminish the economic value of a property or interfere with the owner's reasonable use of the property. Neither the City nor the County can require private land to remain open space; local governments are required to provide for reasonable use of private properties.</p>
EW-2	<p>The comment raises concern related to a different project which replaced a bowling alley with a grocery store.</p> <p>Refer to MR-5, which responds to non-substantive comments. The opinions of the commenter could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p>
EW-3	<p>The comment raises concern related to public school facilities and parking.</p> <p>Refer to MR-2, which responds to comments related to public school services. In addition, it should be noted that parking is not considered an environmental effect that is within the scope of CEQA. As provided in the CEQA Statute, Public Resources Code Division 13, Chapter 2.5, Section 21060.5, "Environment" as used by CEQA means "the physical conditions that exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance." The concern raised regarding parking does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body; however, they do not require preparation of detailed responses in the Final EIR.</p>
EW-4	<p>The comment raises concern related to the provision of emergency services. Refer to MR-1, which responds to comments related to emergency services.</p>
EW-5	<p>The comment raises concern related to housing growth and the need to expand existing utility infrastructure. Refer to MR-14, which responds to comments related to utilities and associated infrastructure, and MR-15, which responds to comments related to population growth and other public services.</p>
EW-6	<p>The comment raises concern related to an increase in traffic. Refer to MR-3, which responds to comments related to transportation and traffic</p>
EW-7	<p>The comment raises concern related to emergency services, schools, trails and recreation, annexation and taxes, visual impacts, roads, water supply, population growth, land use consistency, tax rates, and other public services. The comment also claims that the project site should not be considered within the City's SOI.</p> <p>Refer to MR-17, which responds to comments related to land use consistency. SBLAFCO is responsible for establishing, amending, and updating SOIs and city limits for the cities within Santa Barbara County. The project site and much of the surrounding area was previously determined to be within the City's SOI by SBLAFCO.</p> <p>Refer to MR-7 which responds to comments related to parks and recreation. Given the project design is only conceptual at this time, it does not provide details regarding possible walking trails or paths within the development. At the time that a Planned Development Permit application is submitted to the City, further consideration by the City would occur about the incorporation of recreational features within the proposed development. These considerations would not affect the environmental impact analysis contained within the EIR as the CEQA impact assessment contained in the EIR is focused on whether the project would deteriorate existing recreational facilities. This concern does not change the conclusions contained in the EIR. These points could be relevant for consideration in the subsequent project approval process and have been made available to the decision-making body.</p> <p>Refer to MR-8, which responds to comments related to annexation and economics. Economic impacts are generally not considered environmental impacts under CEQA and only require discussion if the economic impacts would have a negative impact on the physical environment, or if the economic impacts would result in growth-inducing impacts. Neither of these conditions exist for the project. As such, economic impacts are not discussed in the EIR.</p> <p>Refer to MR-6, which responds to comments related to water supply. The project would require a source of supplemental water to offset the increased water demand through the service provider of Golden State Water. The City of Santa Maria has supplemental water supplies. While annexation of the project site is not a prerequisite to or a requirement for allowing for the use of supplemental water supplies to the project site, the</p>

Comment No.	Response
	<p>City typically would provide supplemental water supplies to properties within the city limits. The City has indicated that if the project is annexed to the City, the City would allow the project to purchase supplemental water and to be served by Golden State Water. The Supplemental Water Agreement details would need to be formalized and would occur after annexation and in conjunction with the future development of the site under discretionary Planned Development Permits. With the supplemental water supply being provided by Santa Maria, based on the lowest projected available water supply during extreme drought conditions, Golden State Water would still have adequate water supply to serve the proposed project and its existing service area. Golden State Water has issued a will-serve letter to provide domestic and fire protection water services for the proposed project (Golden State Water 2023) if supplemental water is provided. Therefore, as described in the EIR, sufficient water supply would be available to serve the water demand generated by the proposed project and the existing service area.</p> <p>Additionally Refer to MR-1, which response to comments related to emergency services, MR-2, which responds to comments related to public school services, MR-3, which responds to comments related to transportation and traffic, MR-10, which responds to comments related to visual resources, MR-14 which responds to comments related to utilities and infrastructure, and MR-15 which responds to comments related to population growth and other public services.</p>

*This page intentionally left blank.*

## 1.5 VOLUME 2 REFERENCES

- Associated Transportation Engineers (ATE). 2022. *Updated Traffic and Circulation Study for the Richards Ranch Project, City of Santa Maria, California*. ATE #21069. Santa Barbara, California.
- . 2023. *Response to Comments and Supplemental Traffic Analysis for the Richards Ranch Project, City of Santa Maria, California*. ATE #21069. Santa Barbara, California.
- AMBIENT Air Quality & Noise Consulting (AMBIENT). 2022a. *Air Quality and Greenhouse Gas Impact Assessment for the Proposed Richards Ranch Project Santa Maria, CA*. September. San Luis Obispo, California.
- . 2022b. *Energy Impact Assessment for the Proposed Richards Ranch Project Santa Maria, CA*. September. San Luis Obispo, California.
- . 2022c. *Noise and Groundborne Vibration Impact Assessment for the Proposed Richards Ranch Project Santa Maria, CA*. September. San Luis Obispo, California.
- . 2023. *Response to Comments and Supplemental CalEEMod Modeling for the Richards Ranch Project, City of Santa Maria, CA*. March. San Luis Obispo, California.
- California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>. Accessed July 2022.
- California Department of Conservation Geologic Energy Management Division (CalGEM). 2019. *Well Finder Database*. Available at: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>. Accessed February 2024.
- California Department of Fish and Wildlife (CDFW). 2023. *Comments on the Draft Environmental Impact Report for the Richards Ranch Annexation Project (AN2021-0001) Project #2128, SCH #2022020194, Santa Barbara County*. Memorandum to Dana Eady, Planning Manager, City of Santa Maria. March 14.
- California Department of Resources Recycling and Recovery (CalRecycle). 2021. *SWIS Facility/Site Activity Details: Santa Maria Regional Landfill (420AA-0016)*. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1253?siteID=3284>. Accessed April 2022.
- California Governor's Office of Planning and Research (OPR). 2017 *General Plan Noise Element Guidelines*. Available at: [https://opr.ca.gov/docs/OPR\\_COMPLETE\\_7.31.17.pdf](https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf). Accessed April 2022.
- . 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Available at: [https://www.opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf). Accessed November 2022.
- City of Santa Maria. 1996. *General Plan Resources Management Element*. Available at: <https://www.cityofsantamaria.org/home/showpublisheddocument/598/635488452761730000>. Accessed April 2022.



- . 2009. *Noise Element of the Santa Maria General Plan*. Available at: <https://www.cityofsantamaria.org/home/showpublisheddocument/596/635488452758600000>. Accessed July 2022.
- . 2011. *Santa Maria General Plan. Land Use Element*. Available at: <https://www.cityofsantamaria.org/city-government/departments/community-development/planning-division/planning-policies-and-regulations/general-plan>. Accessed March 2022.
- . 2019. *Santa Maria Recreation and Parks Leisure Needs Assessment and Action Plan*. Available at: <https://www.cityofsantamaria.org/home/showpublisheddocument/27078/637157187679170000>. Accessed April 2022.
- . 2020. *City of Santa Maria Active Transportation Plan*. Available at: <https://www.cityofsantamaria.org/home/showpublisheddocument/27722/637510471193430000>. Accessed November 2022.
- . 2023. *Santa Maria General Plan Imagine, Preferred Land Use Alternative Memorandum*. Available at: [https://www.imaginesantamaria.com/\\_files/ugd/e3bef4\\_fa689afb6f0e425488c9ead1d066b0f7.pdf](https://www.imaginesantamaria.com/_files/ugd/e3bef4_fa689afb6f0e425488c9ead1d066b0f7.pdf). Accessed November 2022.
- California Stormwater Quality Association. 2003. *Stormwater Best Management Practice Handbook – Municipal*. Available at: [https://www.casqa.org/sites/default/files/BMPHandbooks/BMP\\_Municipal\\_Complete.pdf](https://www.casqa.org/sites/default/files/BMPHandbooks/BMP_Municipal_Complete.pdf). Accessed April 2022.
- City of Seaside. 2020. *Initial Study/Mitigated Negative Declaration, Costco Fueling Station Addition*. Available at: <https://www.ci.seaside.ca.us/DocumentCenter/View/10420/Initial-Study-Costco-Gas-Station-?bidId=>. Accessed April 2024.
- City of Novato. 2021. *Initial Study/Mitigated Negative Declaration, Costco Fuel Center and Rowland Boulevard Public Works Project*. Available at: <https://www.novato.org/home/showpublisheddocument/32012/637466721604230000>. Accessed April 2024.
- County of Santa Barbara. 2019. *Final Mitigated Negative Declaration, Orcutt Fueling Center*. Available at: <https://cosantabarbara.app.box.com/s/o9fp2865sykaqn98s0702plaa96xj7t5/file/489711683763>. Accessed April 2024.
- . 2022. *Orcutt Community Plan*. Adopted July 1997; last amended May 2022. Available at: <https://content.civicplus.com/api/assets/ca-santabarbaracounty/8a5f37ca-3d4a-4dc0-a487-73a973b6d9e6/orcutt-community-plan-pdf-.pdf?sq=c3024cb2-ca22-99de-3b73-fb50d06f546e&scope=all>. Accessed April 2024.
- David Wolff Environmental, LLC (DWE). 2022. *Biological Resources Assessment for the Richards Ranch, LLC Mixed Use Development Project, City of Santa Maria, CA*. Prepared for Richards Ranch, LLC. July 8. On file, SWCA Environmental Consultants, San Luis Obispo, California.

- . 2024. *Monarch Butterfly Impact and Mitigation Analysis for the Richards Ranch Annexation Project*, City of Santa Maria, California. May 6.
- Earth Systems Pacific. 2021. *Geotechnical Engineering Report for Richards Ranch Union Valley Site East of South Broadway and Union Valley Parkway Santa Maria Area of Santa Barbara County, California*. Santa Maria, California.
- Emergency Services Consulting International. 2021. *Community Risk Assessment: Standards of Cover*. Available at:  
<https://www.cityofsantamaria.org/home/showpublisheddocument/27128/637774990996200000>. Accessed April 2022.
- Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. Available at:  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf). Accessed July 2022.
- Golden State Water Company (Golden State Water). 2023. *Preliminary Can And Will Serve Letter. Key Site 26 – Richards Ranch APN 107-250-019 - 107-250-022 43.7-acre Commercial and Residential Development*. Santa Maria, California.
- Laguna County Sanitation District (LCSD). 2019. *Sewer Collection System Master Plan*. Available at:  
<https://content.civicplus.com/api/assets/3fbfcaee-b31f-44d4-ab0f-9d20eb815aac?cache=1800>. Accessed April 2022.
- . 2022. Electronic correspondence from Martin Wilder, P.E., Laguna County Sanitation District Manager to Michael D. Stoltey, Md3 Investments. Subject: Richard's Ranch Development (Also Known as Orcutt Community Plan Key Site 26) APN: 107-250-019, 020, 021, and 022 Sewer Service. May 17, 2022.
- Orcutt Union School District (OUSD). 2022. *Developer Fee Justification Study*. March. Available at:  
<https://www.orcuttschools.net/wp-content/uploads/2022/04/Orcutt-Dev-Fee-Study-2022-2.pdf>. Accessed February 2024.
- Pleinaire Design Group. 2023. *Tree Survey & Details for Richard's Ranch*. Santa Maria, California. July 13.
- Santa Maria Fire Department (SMFD). 2022. Richards Ranch Project Team Meeting with Fire Chief Todd Tuggle. Virtual Meeting Correspondence. May 4, 2022. Meeting minutes on file, SWCA Environmental Consultants, San Luis Obispo, California.
- . 2024. Email Correspondence with Fire Chief Bradley J. Dandridge. April 12, 2024. On file, SWCA Environmental Consultants, San Luis Obispo, California.
- Silva, J. 2022. Personal communication, Jesse Silva, Police Lieutenant, City of Santa Maria Police Department, with Bobbette Biddulph, Senior Environmental Planner, SWCA Environmental Consultants, and Dana Eady, Planning Division Manager, City of Santa Maria, July 27, 2022.
- Santa Maria Joint Union High School District (SMJUHSD). 2022. *Developer Fee Justification Study*. March. Available at:  
<https://content.myconnectsuite.com/api/documents/11a097d8ee414aa7b04f10abb027e61b.pdf>. Accessed February 2024.

- . 2023. Enrollment Capacity Information for SMJUHSD - Ernest Righetti High School. Email correspondence between Alicia King, Facilities Planner, Santa Maria Joint Union High School District and Shannon Pagan, Environmental Planner, SWCA Environmental Consultants, dated July 12, 2023. On file with SWCA Environmental Consultants, San Luis Obispo, California.
- Santa Barbara County Association of Governments (SBCAG). 2017. *Santa Barbara Municipal Airport Master Plan Final EIR*. Available at: <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=173401>. Accessed July 2022.
- . 2019. *2050 Regional Growth Forecast*. Available at: [https://www.sbcag.org/wp-content/uploads/2023/08/regional\\_growth\\_forecast\\_2050.pdf](https://www.sbcag.org/wp-content/uploads/2023/08/regional_growth_forecast_2050.pdf). Accessed February 2024.
- . 2022. *Draft Santa Maria Airport Land Use Compatibility Plan*. Available at: [http://www.sbcag.org/uploads/2/4/5/4/24540302/smx\\_alucp\\_v2\\_clean.pdf](http://www.sbcag.org/uploads/2/4/5/4/24540302/smx_alucp_v2_clean.pdf). Accessed May 2022.
- . 2023. *Santa Maria Airport Land Use Compatibility Plan*. Available at: [https://www.sbcag.org/wp-content/uploads/2023/09/smx\\_alucp\\_v2\\_final.pdf](https://www.sbcag.org/wp-content/uploads/2023/09/smx_alucp_v2_final.pdf). Accessed September 2023.
- Santa Maria Times. 2022. *Fund for new Orcutt Library hits \$5M with addition of federal funds*. Available at: [https://santamariatimes.com/news/local/fund-for-new-orcutt-library-hits-5m-with-addition-of-federal-funds/article\\_5ec32d4c-0ad5-501b-bcce-f372c305f235.html](https://santamariatimes.com/news/local/fund-for-new-orcutt-library-hits-5m-with-addition-of-federal-funds/article_5ec32d4c-0ad5-501b-bcce-f372c305f235.html). Accessed February 2024.
- SWCA. 2024. *Technical Memorandum, Monarch Butterfly Habitat Conservation and Mitigation Opportunities, Richards Ranch Annexation Project*. June 28.
- Todd Groundwater. 2022. *Final Water Supply Assessment; Richards Ranch, City of Santa Maria*. Alameda, California.
- Tully and Young. 2021. *Orcutt Service Area 2020 Urban Water Management Plan*. Prepared for Golden State Water Company. Available at: [https://wuedata.water.ca.gov/public/uwmp\\_attachments/9607480704/GSWC-Orcutt%202020%20UWMP%20Final.pdf](https://wuedata.water.ca.gov/public/uwmp_attachments/9607480704/GSWC-Orcutt%202020%20UWMP%20Final.pdf). Accessed April 2022.
- U.S. Census Bureau. 2022. *Quick Facts City of Santa Maria, California*. Available at: <https://www.census.gov/quickfacts/santamariacitycalifornia>. Accessed March 2022.
- U.S. Fish and Wildlife Service (USFWS). 2016. *Final Recovery Plan for the Santa Barbara County Distinct Population Segment of the California Tiger Salamander Central California (Ambystoma californiense)*. Ventura, California: U.S. Fish and Wildlife Service Pacific Southwest Region.
- . 2023. Richards Ranch Project in Santa Barbara County. Email Communication from Joseph Brandt, Senior Biologist, USFWS Ecological Services to Dana Eady, Planning Manager, City of Santa Maria. May 15.
- Xerces Society for Invertebrate Conservation. 2018. *Monarch Butterfly Nectar Plant List for Conservation Plantings*. Available at: [https://xerces.org/sites/default/files/publications/18-003\\_02\\_Monarch-Nectar-Plant-Lists-FS\\_web%20-%20Jessa%20Kay%20Cruz.pdf](https://xerces.org/sites/default/files/publications/18-003_02_Monarch-Nectar-Plant-Lists-FS_web%20-%20Jessa%20Kay%20Cruz.pdf). Accessed September 2, 2023.