

de la Guerra, Sheila

Public Comment Group 1

#3

**From:** Todd Wilson <toddwojai@comcast.net>  
**Sent:** Monday, December 14, 2020 3:29 PM  
**To:** sbcob  
**Subject:** Public Comment 12-15-2020 BOS Hearing  
**Attachments:** 12-13-2020 Final UVP letter to BOS 12-15 Hearing.docx



**Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.**

Dear clerk of the board,

This is my third comment letter submission for the 12-15-2020 Board of Supervisors Hearing.

This agenda item is for Union Valley Parkway Extension (UVP) 18GPA-00000-00001

Best Regards,  
Todd Wilson  
(805) 287-9363

December 13, 2020

Subject: December 15, 2020 S.B. County Board of Supervisors Hearing on the Union Valley Parkway Extension Project (Negative Declaration dated October 20, 2020 [19NGD-00000-00013], Case Nos. 18GPA-00000-00001)

Chair Hart and Board of Supervisor Members,

This letter is to recommend the Board take no action on this pending Union Valley Parkway (UVP) application and continue this final determination to a future date. My objection relates to adequacy of the UVP project Draft Negative Declaration, which I feel is inadequate, regarding CEQA Growth Inducing Impacts. It is my opinion a full EIR is necessary to appropriately reflect full impacts of proposed important infrastructure plan.

While not an attorney or CEQA expert, CEQA Section 15064 a(1) states; "If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR." Further CEQA Section 21,100 (b)(2)(B) states; "Any significant effect on the environment that would be irreversible if the project is implemented."

Planning and Development Public records reveal a proposal document, Finalized April 5, 2019 and titled; Conceptual Drawings and Environmental Review for the Orcutt Community Plan Amendment Project. Review of this document clearly reflects intentions to conduct an EIR under CEQA guidelines, Section 15123 for this same UVP GPA Amendment. While referenced UVP Neg. Dec. objective is to remedy traffic congestion and provide secondary access for Elks Rodeo Event Center, new school Ag. Class room and potential freeway frontage commercial facilities, this environmental review misses the elephant in the room, being GROWTH INDUCING expansion into valuable regional agriculture, open space land East of the U.S. Hwy 101 interchange.

#### Growth Enducement

Not only did S.B. Planning and Development intend to order a full EIR, indicated in the April, 2019 Environmental review document above – UVP Draft Mitigated Negative Declaration (DND) is available in the 12-15-2020 Board packet for UVP Hearing, which provides substantial review of potential GROWTH INDUCING Significant impacts. Pages 66 through 72, provides multiple study examples of potential significant growth inducing impacts.

Page 67 on County Environmental Thresholds, says this: "The County Environmental Thresholds (2018a) contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project would result in substantial growth inducing effects ..."

Page 71 says this: "Although the proposed project would eliminate one of several obstacles to development East of the study area, the proposed project is just one step away in a series of requirements that must first be realized for potential future development to commence."

#### Conclusion

My concern is L.A. County and Ventura County style URBAN SPRAWAL, most recently seen on the Oxnard Plain. Santa Maria Valley's rich agricultural and open space land is just ripe for poor planning practices. The fact that Elks Rodeo Event Center experiences traffic congestion, requiring this remediation, is an indicator of poor planning in my view. A Full EIR would provide wise growth management tools for smart growth in North County.

Best regards,

Todd Wilson  
114 Wilson Dr.  
Orcutt, Ca. 93455

**de la Guerra, Sheila**

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**From:** Todd Wilson <toddwojai@comcast.net>  
**Sent:** Tuesday, December 15, 2020 6:57 AM  
**To:** sbcob  
**Subject:** Public comment - 12-15-2020  
**Attachments:** 12-13-2020 Final UVP letter to BOS 12-15 Hearing.docx

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Dear Clerk of the Board,

I have submitted 4 timely Public Comment Letters for today's 12-15-2020 Board of Supervisors "Virtual" meeting. Only one has been posted. It is important these letters be a part of the public record -Please allow me to resubmit for timely hearing posts.

1. Union Valley Parkway (Case 18GPA-00000-00001) Comment Letter e-mailed on 12-15-2020 at 3:29 P.M. Resubmittal is attached

Todd Wilson  
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