FINAL

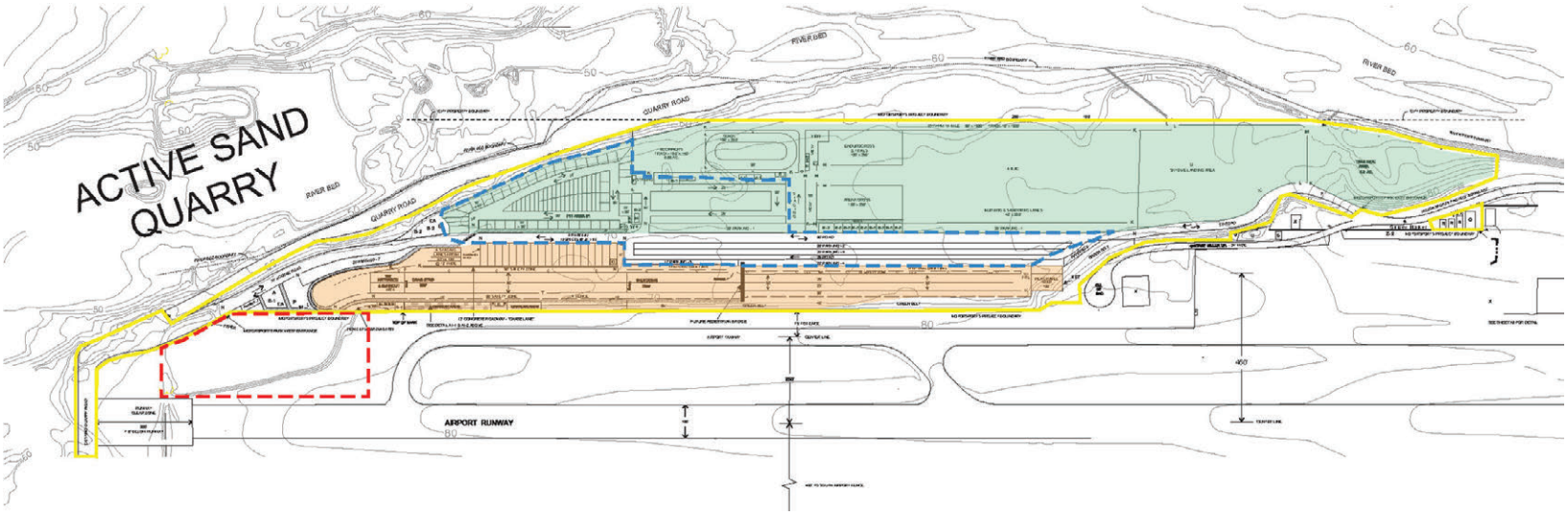
Prepared For:

City of Lompoc
Planning Division
100 Civic Center Plaza
P.O. Box 8001
Lompoc, CA 93438

Lompoc Motorsports Park

Environmental Impact Report

(SCH No. 2015121005)



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NOVEMBER 2016

Final

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Lompoc Motorsports Project

City of Lompoc

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Prepared for:

City of Lompoc
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Lompoc, California 93436

Prepared by:

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November 2016

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1.0 INTRODUCTION

PURPOSE

This Final Environmental Impact Report ("Final EIR") has been prepared for the proposed Lompoc Motorsports Project ("proposed Project") by the City of Lompoc ("City"). The purpose of a Final EIR is to provide an opportunity for the Lead Agency to respond to comments made by the general public and public agencies on the information, analysis, and conclusions in the Draft EIR. The document was created in accordance with the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) and the "Guidelines for the Implementation of the California Environmental Quality Act" (California Code of Regulations, Title 14, Section 15000 et seq., "State CEQA Guidelines").

The City will consider the public comments and comprehensive planning analysis in the Final EIR before it approves, denies, or makes changes to the proposed Project. The evaluation and response to these comments is highly important to the CEQA process. It allows for a comprehensive review on the methods of analysis used within the Draft EIR; the opportunity to detect and respond to omissions; the ability to check the adequacy and veracity of the analysis; and the opportunity to share both expert opinions and public concerns about the proposed Project.

ORGANIZATION OF FINAL EIR

As required by the State CEQA Guidelines, Section 15132, this Final EIR includes the following information:

- The Draft EIR or a revision of the draft. This Final EIR incorporates the Draft EIR by reference;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The comments received on the Draft EIR;
- The responses to significant environmental points raised in the comments received; and
- The revisions to the Draft EIR.

The Final and Draft EIRs are available for review at the following location:

City of Lompoc
Economic Development Department—Planning Division
100 Civic Center Plaza
Lompoc, California 93438-8001
Attention: Lucille Breese, AICP, Planning Manager

In addition, the Final EIR and Draft EIR are available on the City's website at:

http://www.cityoflompoc.com/comdev/Environmental-Open.htm

ENVIRONMENTAL REVIEW PROCESS

The City is the Lead Agency responsible for preparation of this Final EIR because it has the principal responsibility for approving and implementing the proposed Project.

On November 24, 2015, the City circulated a Notice of Preparation (NOP; State Clearinghouse [SCH] Number 2015121005) of an EIR for review and comment by the public and by responsible and reviewing agencies. The 30-day NOP review period ended on December 30, 2015. The City then prepared the Draft EIR, including an analysis of potential impacts related to the following 14 environmental topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Traffic and Circulation
- Utilities and Service Systems

The City released the Draft EIR for a 52-day public review period beginning June 24, 2016, and ending on August 15, 2016, a period greater than the City's typical 45-day public review period for a Draft EIR. The review period was extended by the City to provide additional time for the public to review the Draft EIR. A Notice of Completion of the Draft EIR was provided to the State of California Governor's Office of Planning and Research State Clearinghouse for environmental review documents with copies for review by state agencies.

A Notice of Availability of the Draft EIR for review was also mailed by the City to all owners of property located within 300 feet of the Project Site and others who requested this notice. In addition, the Notice of Availability was also published on June 22, 2015, in the *Lompoc Record* and filed with the Santa Barbara County Clerk.

Following the completion of the review period for the Draft EIR, the City prepared this Final EIR as required by Section 15089 of the State CEQA Guidelines. The Final EIR consists of the June 2016 Draft EIR, comments received by the City during the 52-day public comment period, responses to those comments, and changes to the text of the Draft EIR. As stated previously, this Final EIR incorporates the Draft EIR by reference.

Prior to considering approval of the proposed Project, CEQA Guidelines Section 15090 requires the City to certify the following:

- The Final EIR was completed in compliance with CEQA.
- The Final EIR was presented to the City Council; and the City Council reviewed and considered the information contained in the Final EIR prior to considering approval of the proposed Project.
- The Final EIR reflects the City's independent judgment and analysis.

Section 15191 of the State CEQA Guidelines requires the City to make one or more written findings of fact for each significant environmental impact identified in a certified Final EIR. The possible findings include the following:

- The proposed Project was changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact.
- Changes to the proposed Project are within another agency's jurisdiction and have been or should be adopted.
- Specific considerations make mitigation measures or alternatives infeasible.

After considering the information in the Final EIR and making the required findings, the City may consider approval of the proposed Project. If impacts are identified in the Final EIR as significant and unavoidable, the City is required to prepare a Statement of Overriding Considerations identifying the specific benefits of the proposed Project that the City determines outweigh the unavoidable impacts of the proposed Project.

Section 15097 of the State CEQA Guidelines requires the City to adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure that the mitigation measures identified for the proposed Project in the EIR are implemented.

CONTENTS OF THE FINAL EIR

A description of the organization of this Final EIR and the contents of each section are provided below to assist the reader in using this Final EIR as a source of information about the proposed Project. The Final EIR has been organized to include the other required elements of a Final EIR in a format that provides easy access for the reader to the most important information related to the key issues associated with this proposed Project. Sections of the Final EIR following this Introduction are organized as follows:

Section 1.0, Introduction, provides the purpose of the Final EIR and a description of the Draft EIR review and decision-making process.

Section 2.0, Comments and Responses to Comments, contains a table of public agencies and private parties that submitted written comments on the Draft EIR during the public review period. A copy of each letter received by the City commenting on the Draft EIR is provided, followed by written responses to each comment contained in the letters.

Section 3.0, Revisions to the Draft EIR, contains revisions made to the Draft EIR resulting from comments made on the Draft EIR, minor staff edits, or minor modifications made to the proposed Project.

2.0 RESPONSES TO COMMENTS

INTRODUCTION

This section of the Final Environmental Impact Report (EIR) presents copies of comments on the Draft EIR received in written form during the public review period, and it provides the City of Lompoc's (City) responses to those comments. Each comment letter is numbered, and the subjects within each comment letter are identified by brackets and numbers. Comment letters are followed by responses, which are numbered to correspond with the bracketed comment letters.

In review of the letters received, the City identified several common topics commented on in multiple letters. To address these common topics, subsection, Topical Responses, provides responses addressing these topics. The responses to individual comments on these topics refer to these Topical Responses when appropriate.

The City's responses to comments on the Draft EIR represent a good-faith, reasonable effort to address the environmental issues identified by the comments. Under the California Environmental Quality Act (CEQA) Guidelines, the City is not required to respond to all comments on the Draft EIR, but only to those comments that raise environmental issues (refer to CEQA Guidelines, Section 15088[a]). Case law under CEQA recognizes the City need only provide responses to comments that are commensurate in detail with the comments themselves. In the case of specific comments, the City has responded with specific analysis and detail; in the case of a general comment, the reader is referred to a related response to a specific comment, if possible. The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses.

Organization and Table of Comment Letters

The City received a total of seven comment letters from State agencies, regional agencies, and local agencies. **Table 2.0-1, Comment Letters Received on the Lompoc Motorsports EIR,** provides a list of all comment letters received and the identification number for each letter.

Table 2.0-1
Comment Letters Received on the Lompoc Motorsports Draft EIR

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
State Agencies			
State of California, Department of Transportation	Philip Crimmins, Aviation Environmental Specialist	July 18, 2016	1
State of California, Department of Fish and Wildlife	Edmund Pert, Regional Manager, South Coast Region	August 15, 2016	2
State of California, Department of Transportation	Melissa Streder, Planning and Development Review, Caltrans District 5	August 15, 2016	3
Local Agencies			
Santa Barbara County Public Health Department, Environmental Health Services, Leaking Underground Fuel Tank (LUFT) and Site Mitigation Unit (SMU)	E. Steven Nailor	August 10, 2016	4
County of Santa Barbara, Executive Offices	Mona Miyasato, Executive Officer	October 5, 2016	5
City of Lompoc Airport Commission	Jeff Palmer, Commission Chairperson	August 12, 2016	6
Santa Barbara County Association of Governments	Peter Imhof, Deputy Executive Director, Planning	August 12, 2016	7
Santa Barbara County Air Pollution Control District	Carly Barham, Air Quality Specialist	August 15, 2016	8
Santa Barbara County Public Health Department	Jan E. Glick, MS, Director, Animal Services	October 5, 2016	73
County of Santa Barbara, Fire Department	Rob Hazard, Deputy Fire Marshal	July 18, 2016	74
County of Santa Barbara, Planning and Development	Glenn S. Russell, Ph.D., Director	August 11, 2016	75

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
Organizations			
Gordon R. Hensley Environmental Services (on behalf of the Lompoc Valley Community Coalition)	Gordon R. Hensley,	August 15, 2016	9
Law Office of Babak Naficy (on behalf of the Lompoc Valley Community Coalition)	Babak Naficy, Attorney at Law	August 15, 2016	10
The Lompoc Valley Parks, Recreation, and Pool Foundation	Carl Creel, Motorsports Park Committee Chairman and John H. Linn, Foundation Chairman	August 15, 2016	11
Santa Barbara County Action Network	Ken Hough, Executive Director	August 15, 2016	12
Individuals			
	Paul and Jacqueline Graybill	June 29, 2016	13
	David Hughes	July 5, 2016	14
	Michael Emerson	July 18, 2016	15
	Troy Nichols	July 19, 2016	16
	Gregg Smith	July 19, 2016	17
	Dale A. Lardy	July 21, 2016	18
	Daniel J. Turocy	July 21, 2016	19
	Rhys M. Evans	July 24, 2016	20

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
	Sandrine Zanella	July 25, 2016	21
	Michael Anderson	July 26, 2016	22
	Art and Sherry Hibbits	July 26, 2016	23
	Lauren Ranard	July 26, 2016	24
	Mark Grober	July 27, 2016	25
	Christine Jeszeck	July 27, 2016	26
	Lawrence V. Serpa Jr.	July 27, 2016	27
	Walter Fasold	July 29, 2016	28
	Anne Jimenez	August 3, 2016	29
	John G. Norris	August 3, 2016	30
	Judith Alderman	August 4, 2016	31
	Steve Castro	August 4, 2016	32
	Patty Darr	August 4, 2016	33
	Molly Gerald	August 4, 2016	34

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
	Lompoc Resident	August 4, 2016	35
	Maria L. Baltierra	August 8, 2016	36
	Jason Nasato	August 8, 2016	37
	Barry and Laurie Weaver	August 8, 2016	38
	Janet Belvins	August 10, 2016	39
	Donald C. Edward, Systems Engineer	August 10, 2016	40
	Terry Hammons	August 10, 2016	41
	Robert and Eileen Wyckoff	August 10, 2016	42
	Mary Ellen Brooks	August 12, 2016	43
	Dianne Burns	August 12, 2016	44
	Walt Fasold	August 12, 2016	45
	Timothy Harrington	August 12, 2016	46
	Lucy Thoms-Harington	August 12, 2016	47
	Wayne and Lorena Maza	August 12, 2016	48

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
	Carol Redhead	August 12, 2016	49
	Karen Anastasio	August 15, 2016	50
	Janet Belvins	August 15, 2016	51
	Janet Belvins	August 15, 2016	52
	Janet Belvins	August 15, 2016	53
	Billie Bryant	August 15, 2016	54
	Steve Dietrich	August 15, 2016	55
	Michael Donohue	August 15, 2016	56
	Linda and Tom Gooch	August 15, 2016	57
	Charles J. Griffin Jr.	August 15, 2016	58
	Claudia Griffin (with Draft Acoustical Review)	August 15, 2016	59
	Claudia Griffin	August 15, 2016	60
	Al and Emily Harry	August 15, 2016	61
	Joan Hartmann	August 15, 2016	62

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
	Larry Henry	August 15, 2016	63
	Art and Sherry Hibbits	August 15, 2016	64
	Thomas Hom	August 15, 2016	65
	Joyce Howerton	August 15, 2016	66
	Karen Hughes	August 15, 2016	67
	Dean and Jan Kays	August 15, 2016	68
	Ed Mandibles	August 15, 2016	69
	Ann Mickadeit	August 15, 2016	70
	Jason Osborne	August 15, 2016	71
	Justin and Ann Ruhge	August 15, 2016	72
	Diane Zaccagnino	August 15, 2016	73

TOPICAL RESPONSES

TOPICAL RESPONSE 1: AIRPORT SAFETY

Comments were received regarding the added risk of aircraft accidents as a result of the proposed Project. Commenters expressed concerns about the Airport's designated Safety Zones and the allotted distance between the recreational park—specifically the grandstands—and the landing/takeoff area. Additionally, comments were received on the potential hazards and safety risks that accumulated dirt and dust may cause, as well as the potential for nighttime lighting to adversely affect pilots. A topical response has been prepared to address those comments.

As described in Section 3.0, Project Description, of the Draft EIR, the proposed Project would include the phased development of the Project site as two park areas, as illustrated in Figure 3.0-3, Conceptual Site Plan. The first park area would include the OHV area, and the second park area would include an International Hot Rod Association (IHRA)–sanctioned one-eighth-mile drag strip with grandstands and pit areas. The skydiving landing area would be relocated to the west of the proposed entrance from George Miller Drive. Given the landing area's proposed location just north of the Lompoc Airport, air safety concerns were analyzed in the Draft EIR. As noted in Section 4.7, Hazards (page 4.7-8), as with any transportation mode, it is not possible to predict when or where a future accident might occur. The National Transportation Safety Board defines any transportation accident as an occurrence where people on board a vehicle or on the ground sustain serious or fatal injuries or where an aircraft incurs damage substantial enough for it to be no longer considered air worthy.

The Draft EIR (page 4.7-8) indicates according to figures contained in the 1991 California Land Use Planning Handbook,[1] a 3-year study period from 1986 to 1988 indicated a national average of 0.36 off-airport accidents per 100,000 operations. Lompoc Airport is expected to have a probability of about 0.11 off-airport accidents per year for its current estimated activity level of approximately 30,000 annual operations.[2]

The Draft EIR (page 4.7-21) determined the proposed Project would not result in accident risks because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the Lompoc Airport. The probability of accident/safety hazard risks before proposed Project

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1 California Department of Transportation (Caltrans) Division of Aeronautics, *California Airport Land Use Planning Handbook* (1991).

2 Heliplanners, Inc. *Aviation Safety Analysis* (March 2016). This is Appendix 4.7 of the Draft EIR.

implementation when compared to after Project implementation would be similar. As such, impacts related to accident risks would be less than significant.

The Draft EIR (page 4.7-5–6) notes the 1993 Airport Land Use Plan (ALUP) defines several "safety zones" that exist around civilian airports. Those safety zones determine the compatibility of various land uses in conjunction with aircraft operation regarding the City's inhabitants' safety and air traffic safety. The ALUP lists three safety zones:[3]

- Zone I: Airport Height Restriction Area
- Zone II: Airport Safety Area
    - Safety Area 1 – Clear Zone.

      Mainly no uses permitted. The exceptions include: Utility, Agriculture (no livestock), water space, and permanent open space.
    - Safety Area 2 – Approach Zone.

      Transportation/communication/utility uses are permitted along with resource production/extraction/open space uses. A mix of commercial/retail trade uses are permitted as well as a mix of outdoor recreation uses. Generally, no residential uses except single-family units. Generally, no industrial/manufacturing uses except warehouse storage and miscellaneous manufacturing. No public and quasi-public services uses are permitted.
    - Safety Area 3 – Airport Traffic Pattern Zone.

      All uses permitted; however, most have conditional use requirements such as being subject to ALUC review.
- Zone III: Airport Noise Area

The proposed Project site is located mainly within the Santa Barbara ALUP's Zone II, Safety Area 3 of the ALUP, so Zone II, Safety Area 3 restrictions are those of relevance. Safety Area 3 is the least restrictive Safety Area within Zone II and is the area in which traffic patterns occur. A small portion of the proposed Project site, the realignment and grading changes to V Street, lies within Safety Area 2.

The Draft EIR (pages 4.7-6–7) further notes Federal Aviation Regulation (FAR) Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Part 77 recognizes "imaginary surfaces" in the airspace surrounding runways that are designed to provide unobstructed maneuvering room for aircraft takeoffs and landings. Those standards serve two purposes: (1)

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3 Heliplanners, *Aviation Safety Analysis* (March 2016).

minimizing hazards to aircraft and (2) helping to prevent injury or damage to people or property on the ground. Ideally, no object, natural or man-made, should penetrate any imaginary surface. The applicable imaginary surfaces to the proposed Project are discussed below.

Primary Surface: serves as the basis for all other imaginary surfaces specified in Part 77. The primary surface is a 500-foot-wide rectangle at runway elevation that extends 200 feet beyond each end of the runway. The elevation of any point on the primary surface is equal to the elevation of the closest point on the runway.

The elevation at the eastern runway end is approximately 88 feet above mean sea level (amsl); the elevation at the western end is 79 feet amsl. Because the runway slopes down from east to west, the primary surface does likewise.

- Horizontal Surface: established at 150 feet above the airport's elevation.

The Lompoc Airport is currently at an elevation of approximately 88 feet amsl. Thus, Lompoc Airport's horizontal surface starts at 238 feet amsl (88 feet + 150 feet).

Transitional Surface: begins at the edge of the primary surface, 250 feet from the runway centerline, and extends laterally along both sides of the runway from the primary and approach surface edges, rising at a 7:1 slope (7 horizontal feet to 1 vertical foot) in each direction.

Approach/Departure Surface: begins where the primary surface ends (200 feet from the end of the runway) extending up and out at a slope of 20:1 (20 feet horizontal to 1 foot vertical). This is the slope for all utility and visual runways.

The Draft EIR (Section 4.9, pages 4.9-13–15) notes the Santa Barbara County ALUP was adopted in 1993 and is the current, primary regulatory measure for the Lompoc Airport. The Santa Barbara County Association of Governments (SBCAG) serves as the Airport Land Use Commission (ALUC). Three goals identified in the ALUP include:

1) Preservation of Navigable Airspace Around Airports

The ALUP describes land uses that should be avoided because they may serve as a distraction and confuse pilots, increasing the risk of hazards within the area. Such land uses to avoid include:

- Any use which would direct a steady light or flashing light of white, green, red or amber color toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA approved navigational signal light or visual approach slope indicator (VASI).

- Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport.
- Any use which would generate smoke or which may otherwise affect safe air navigation within this area.
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or airport instrumentation.

2) General Safety of People and Property around Airports

The 1993 ALUP defines several "safety zones" that exist around civilian airports. Those safety zones determine the compatibility of various land uses in conjunction with aircraft operation regarding the City's inhabitants' safety and air traffic safety. The ALUP lists three safety zones shown to include:[4]

- **Zone I**: Airport Height Restriction Area
- **Zone II**: Airport Safety Area
  - **Safety Area 1 – Clear Zone.** Generally, no uses are permitted. The exceptions include: Utility, Agriculture (no livestock), water space, and permanent open space.
  - **Safety Area 2 – Approach Zone.** Transportation/communication/utility uses are permitted along with resource production/extraction/open space uses. A mix of commercial/retail trade uses are permitted, as well as a mix of outdoor recreation uses. Generally, no residential uses except single-family units are permitted and no industrial/manufacturing uses except warehouse storage and miscellaneous manufacturing. No public and quasi-public services uses are permitted.
  - **Safety Area 3 – Airport Traffic Pattern Zone.** All uses are permitted; however, most are subject to ALUC review.
- **Zone III**: Airport Noise Area
- The zones identified in the ALUP are shown in the Draft EIR on Figure 4.9-6, ALUP Lompoc Airport Safety Areas, in relation to the proposed Project site.
- The proposed Project site lies mainly within ALUP's Zone II, Safety Area 3 so its restrictions are those of relevance.

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4 Heliplanners, *Aviation Safety Analysis* (March 2016).

- The ALUP describes Safety Area 3 as:

  the least restrictive Safety Area within Zone II and the area in which traffic patterns occur, with a small portion just north of the terminus of V Street located within Safety Area 2.

- The ALUP describes Safety Area 2 as:

  an extension of the clear zone in which uses which do not result in a concentration of people or particular fire hazard are generally allowed. Height restrictions in the approach zone are more severe than in other zones except the clear zone and must be absolutely enforced.

A Draft Airport Land Use Compatibility Plan (ALUCP) is currently in preparation; however, because it is only in draft mode and has not been officially adopted, regulatory compliance is not applicable. Therefore, for the purposes of this evaluation, the proposed Project falls under the jurisdiction of the existing ALUP's goals and policies.

The FAA has also developed a series of airport planning criteria that affect the placement of fixed or moveable objects near runway ends, as noted in Draft EIR (Section 4.9, page 4.9-11).[5] Currently, none affect the proposed Project site, which is located approximately 325 feet north of the runway centerline.[6] The proposed Project site does fall within the Approach/Departure Surface, where realignment and grading changes proposed to V Street are located. The existing dirt road used by the sand and gravel company is located approximately 300 feet from the end of the runway and intersects the Approach/Departure surface at approximately 5 feet above the runway's elevation (88 feet amsl).

As discussed in the Draft EIR (Section 4.7, Hazards, and Section 4.9, Land Use), the proposed Project does penetrate the Airport's northern Transitional and Horizontal Surfaces for the light poles as well as the existing Approach/Departure Surface for the proposed V Street extension. Potentially significant impacts relating to airport safety hazards from light poles or the V Street extension would occur.

The Draft EIR (pages 4.9-27–28) notes the proposed Project's lighting standards would penetrate the existing 7:1 Transitional Surface, which begins at the edge of the Primary Surface, 250 feet from the runway centerline. The proposed Project would install 10 permanent lighting fixtures at approximately

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5 Advisory Circular AC 150/5300-13, Airport Design.

6 Heliplanners, *Aviation Safety Analysis* (March 2016).

200 feet from the Primary Surface's northern edge. At that location, the Transitional Surface reaches approximately 107 feet amsl.

The tallest proposed lighting standard would be a maximum height of 125 feet amsl, thus penetrating the Transitional Surface by approximately 18 feet (125 feet amsl – 107 feet amsl). In addition, overhang (such as light shielding, fixtures, etc.) from lighting standards would produce an even greater Transitional Surface penetration.

The proposed Project also proposes five lights approximately 75 feet from the start of the Transitional Surface. At that location, the Transitional Surface reaches approximately 90 feet amsl. The lighting standards are a maximum height of 125 feet amsl as well, and thus penetrate the Transitional Surface by approximately 35 feet (125 feet amsl – 90 feet amsl). As previously mentioned, any overhang (such as light shielding, fixtures, etc.) from lighting standards would produce an even greater Transitional Surface penetration.

The Draft EIR (page 4.9-27) notes FAR Part 77 requires a project be submitted to the FAA for review if it would penetrate a "notice surface" based on a slope of 100 feet horizontal to 1 foot vertical from the nearest point of the nearest runway.

Finally, the Draft EIR determines because the proposed lighting standards would exceed the limits of the Transitional Surface, impacts would be potentially significant.

The Draft EIR (page 4.9-28) notes the proposed Project includes the extension of V Street from its current terminus, just west of the Airport, to provide access to the proposed Project site. Currently, North V Street is located approximately 300 feet west of the end of Runway 7/25.

The Draft EIR (page 4.9-28) notes the current gravel road that extends from the existing terminus of V Street would undergo grading and alignment changes to facilitate access to the proposed Project site. The road would extend through the current gravel operation and across the western portion of the Lompoc Airport approximately 300 feet west of the western end of Runway 7/25. As proposed, the extension of V Street would extend into the Approach/Departure Surface of Runway 7/25.

As required under Part 77, the Approach/Departure Surface is subject to restrictions to ensure aircraft have adequate clearance areas for landing and takeoff. As noted, for the Lompoc Airport, the Approach/Departure Surface begins where the primary surface ends, 200 feet beyond the end of Runway 7/25. The proposed Project includes improving V Street and lowering it via grading such that its final grade would be approximately 7 feet 6 inches below existing Runway 7/25 elevation (88 feet amsl). At completion, the improved V Street would be approximately 7.5 feet below the base elevation of

Runway 7/25, which would provide 12.5 feet of clearance from the road to the bottom of the 20:1 plane for the Approach/Departure Surface.

The Draft EIR notes FAR Part 77 requires a project be submitted to the FAA for review if it would penetrate a "notice surface" based on a slope of 100 feet horizontal to 1 foot vertical from the nearest point of the nearest runway. Further, the Approach/Departure Surface does not permit any intrusions of any type into the area above the 20:1 planar surface, including potential “obstruction evaluation” (OE). As required under Part 77, the Approach/Departure Surface is subject to restrictions to ensure aircraft have adequate clearance areas for landing and takeoff.

The Draft EIR (page 4.9-28) indicates the FAA would most likely restrict the use the portion of V Street that is located in the area beneath the Approach/Departure Surface to vehicles that are less than 12.5 feet tall (including antennas, roof racks and roof top carriers). That includes a planar surface starting at 200 from the end of the runway then extending beyond the runway up and out at a slope of 20:1 from its base elevation until it reaches an elevation 150 above the base elevation.

As the proposed Project includes utilizing V Street for access to the proposed Project site, the Draft EIR (page 4.9-28) noted it would be required to meet any restrictions imposed by FAA, including height limits. As the proposed Project has the potential to intrude into these safety zones, the Draft EIR determined it would result in a significant impact.

The Draft EIR identifies the following mitigation measures to address impacts associated with uses from the proposed project penetrating the Transitional and Approach/Departure Zones:

MM 4.9-1 Prior to the issuance of grading and building permits, the applicant shall:

- Restrict the height of the lighting standard including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface;

  or

- Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

MM 4.9-2 Prior to the completion of the V Street extension, the project applicant shall construct a height-restricting barrier over the entry-way to the proposed Project site's access point on "V" Street and the Approach/Departure Surface, such that it restricts access to vehicles more than 12 and 1/2 feet including antennas, roof racks and roof top carriers.

As a secondary option to the height-restricting barrier, the project applicant shall lower the V Street access elevation to 17.5 feet below the existing elevation of the Approach/Departure Surface such that vehicles less than 22.5 feet including antennas, roof racks and roof top carriers will not penetrate the Approach/Departure Surface.

As proposed and discussed in the Draft EIR Project description, lighting would be provided in the OHV area for evening and nighttime activities via a portable system. As proposed, the lighted areas by portable lights would illuminate approximately 5 to 7 acres. The drag strip area would include ten 55-foot-tall towers along the north side of the strip and five 55-foot towers along the south side of the strip for nighttime events (see Draft EIR Figure 4.9-7, Schematic of Transitional Surface). Each light would be shielded and angled downward to meet FAA standards, and would include aircraft warning lights atop each pole. In addition, an LED timing board would be provided on the proposed Project site. All lighting shall conform to the standards set forth in the Lompoc Municipal Code.

Implementation of the above mitigation measures would reduce impacts to less than significant.

TOPICAL RESPONSE 2: BIOLOGICAL RESOURCES

Comments were received related to the potential impacts of the proposed Project on the existing biological resources within and around the proposed Project site. The comments noted construction and operation of the proposed Project would directly impact the existing floral and faunal species**,** in addition to the Santa Ynez River habitat. Concerns were raised for the "reconnaissance-level" survey and lack of surveys conducted within the Project area. A topical response has been prepared to address those comments.

Floral/Faunal Species

As described in Section 4.3, Biological Resources, of the Draft EIR, the majority of the proposed Project site supports various types of riparian vegetation that comprise state wetlands under the jurisdiction of the California Department of Fish and Wildlife (CDFW). The proposed Project site is located on a riverine bench, or terrace, about 10 feet in elevation above the bed of the Santa Ynez River. As indicated in Section 4.3 of the Draft EIR and the CDFW Comment Letter, the proposed Project site is located adjacent to the Santa Ynez River streambed.

The list of species to be considered within the proposed Project site was based on the results of comprehensive literature review, filed surveys, and previous regional and area biological studies, including *Habitat and Natural Resources Assessment for the Lompoc Motorsports Park* prepared by BioResource Consultants Inc. (see Appendix 4.3, Habitat Assessment, of the Draft EIR). Additional information was provided from the California Natural Diversity Database (CNDDB), California Native Plant Society Electronic Inventory (CNPS), and US Fish and Wildlife Service (USFWS).

Prior to implementing biological surveys, standard database searches were conducted and reports from previous surveys of the area were reviewed to obtain pertinent information regarding potential special-status species, as well as sensitive natural communities that occur within the proposed Project vicinity. Information about documented special-status plant and animal species that occur within the Project vicinity was obtained from the CNDDB; the CNDDB search included the US Geological Survey (USGS) 7.5-minute quadrangles for Lompoc and surrounding area (see pages 4.3-1–2 in Section 4.3 of the Draft EIR). Additional literature and databases referenced include:

- CNPS's Inventory of Rare and Endangered Plants of California, which contains species-specific habitat requirements for plant species;
- USFWS database of designated Critical Habitat;
- *The Jepson Manual: Vascular Plants of California*, 2nd ed.;
- *A Manual of California Vegetation*, 2nd ed.; and
- eBird website.

After review of the available literature for the proposed Project vicinity, a survey was conducted on January 8, 2016, to determine the likelihood of occurrence of any special-status plant or wildlife species.

The following vegetation communities/alliances were identified within the proposed Project site: arroyo willow thicket (AWT), coyote brush scrub (CBS), nonnative annual grasslands/mustards, individual willows, and disturbed/developed areas. The AWT, which occurs along the north, west, and southwest portions of the proposed Project site, is considered by Santa Barbara County and the CDFW to be a plant community of special concern. In addition, the AWT is identified by the City of Lompoc as a significant biological area, riparian vegetation streamside habitat. The dominant plant species encountered during the field surveys were documented and are graphically shown on Figure 4.3-1, Existing Vegetation, in the Draft EIR.

As observed during the surveys, vegetation within the proposed Project site consisted of patchy AWT (*Salix lasiolepis*) with CBS (*Baccharis pilularis*), Black Cottonwood Forest (*Populus trichocarpa*), and weedy disturbed areas. Many of the willows and cottonwoods were dead or in poor health with a

reduced foliage density and canopy cover, perhaps due to the ongoing drought (see Photos 1–9 of Appendix 2.1 of this Final EIR).

The survey conducted in January also documented wildlife species with the potential to occur near the proposed Project site. No special-status animals were observed, and the survey concluded the proposed Project site does not contain designated critical habitat for sensitive species.

The potential impacts to sensitive species were documented in Section 4.3 of the Draft EIR, and mitigation measures (**MM 4.3-1** through **MM 4.3-8**) were applied if the potential for significant impacts existed. Impacts to plant and wildlife species were determined to result in less than significant impacts after implementation of mitigation.

The vegetation identified during those surveys was consistent with vegetation identified in the Draft EIR. The proposed Project site supports relatively low-quality nesting habitat for the southwestern willow flycatcher due to the relatively open canopy and lack of standing water or saturated soils. The most suitable vegetation for habitat occurs at the far western edge of the study area, on the west side of the airport runway.

During the public review comment period, additional surveys were conducted to determine presence/absence of southwestern willow flycatcher identified as likely to occur within the proposed Project area (see **Appendix 2.1, Southwestern Willow Flycatcher Protocol Survey,** of the Final EIR). Protocol surveys were conducted on May 20, June 3, June 10, June 27, and July 5, 2016, to determine presence/absence for southwestern willow flycatcher, as well as to document any other observed species within the proposed Project site. Protocol surveys were conducted between dawn and 10:25 AM under fair-weather conditions suitable for observing bird activity. The survey area is located outside and to the south of the active river channel, which was dry at the time of the survey. No saturated soils, standing water, or recently scoured channels were observed within the study area during the surveys (page 5 of Appendix 2.1 of this Final EIR).

The nearest CNDDB records for southwestern willow flycatcher are occurrence numbers 1 and 39 from 1995 and 1989, respectively (Appendix 2.1 of the Final EIR). Those occurrences are 12.4 and 13.2 miles (20.0 and 21.2 kilometers) east of the proposed Project site, respectively, along the Santa Ynez River. The southwestern willow flycatcher was not observed on site, and no habitat was discovered during protocol surveys. In addition, no critical habitat is located on site.

As the protocol surveys and the review of the literature did not indicate presence on site or near the project vicinity, impacts to southwestern willow flycatcher are considered less than significant.

As identified in **Mitigation Measure MM 4.3-4,** preconstruction surveys are required prior to construction activities to determine if nesting birds, as well as any other species of concern, are present within the proposed Project site.

The following special-status wildlife species per CDFW were observed during the both initial site and protocol surveys:

- Cooper's hawk (*Accipiter cooperii*): State of California Watchlist (WL) when nesting. Cooper's hawk fledglings were observed or heard vocalizing in the dense woodlands at the far western and far eastern ends of the proposed Project site on July 5, 2016.
- Allen's hummingbird (*Selasphorus sasin*): Federal Bird Species of Conservation Concern (BCC) when nesting. Allen's hummingbirds were observed throughout the proposed Project site. No nesting was observed, but nesting would be expected during the late winter or early spring months.
- Nuttall's woodpecker (*Picoides nuttallii*): BCC (nesting). Nuttall's woodpeckers were observed during most visits and likely nest in the proposed Project site.
- Loggerhead shrike (*Lanius ludovicianus*): State Species of Special Concern (SSC) and BCC when nesting. A single loggerhead shrike was observed on July 5, 2016, in the northwestern section of the proposed Project site. No nesting was suspected, and this species is commonly seen in coastal areas in the summer after migrating from inland regions where they nest during the spring.
- California horned lark (*Eremophila alpestris actia*): WL. California horned larks were observed singing in two different locations: near the airport runway and along George Miller Drive. No nesting was observed, but nesting is considered likely.
- Yellow warbler (*Setophaga petechia*): SSC, BCC (nesting). A male yellow warbler was observed singing in the black cottonwood forest at the east end of the proposed Project site on May 20, 2016, but was not detected thereafter and is considered a likely transient.

None of those species are considered high-priority special-status species (see Table 4.3-5, Special-Status Wildlife Species, of Section 4.3 of the Draft EIR); and their locations were not mapped.

Protocols for survey of the black-flowered figwort require the survey be completed during the species' blooming period (March–July). A focused survey was conducted on July 25, 2016, to determine the presence/absence of black-flowered figwort. That survey was conducted to allow consideration of the proposed Project in the event it was to proceed; the requirement for the survey was identified in the Draft EIR as **Mitigation Measure MM 4.3-2**.

Seventy-five plant species were observed during the black-flowered figwort survey. Of those 75 species, 49 are native species, and 26 are nonnative (Appendix A). The proposed Project site provides habitat for black-flowered figwort within riparian scrub habitat within the AWT and CBS (refer to Figure 2 of Appendix 2.2, Lompoc Motorsports Park Black-Flowered Figwort Survey). However, the understory in those communities consists of dense cover of poison oak (*Toxicodendron diversilobum*) and poison hemlock (*Conium maculatum*), which are outcompeting the black-flowered figwort and other native species. Black-flowered figwort was not observed during the survey. In addition, no plants of the genus *Scrophularia* were observed. Given the black-flowered figwort was not observed on site, no impacts would occur.

Mitigation Measure MM 4.3-1 identifies a Restoration and Mitigation Plan for the proposed Project site to offset impacts to AWT and CBS. Accordingly, impacts to those species would be less than significant with mitigation.

As discussed on page 4.3-35 of the Draft EIR, critical habitat for the southern California steelhead is within and contained by the Santa Ynez River, adjacent to the proposed Project site. No critical habitat for the southern California steelhead exists on site. As such, the proposed Project would not have any direct impacts on the southern California steelhead. Additionally, the proposed Project is designed so surface water runoff on site will be directed and contained in two infiltration basins: one to the north of the drag strip, and one extending along the south end of the drag strip. As such, all surface water runoff would be captured in those two areas, with no runoff drainage into the Santa Ynez River. Therefore, no indirect impacts to steelhead or its habitat would occur.

TOPICAL RESPONSE 3: HYDROLOGY

Comments were received on the proposed Project's potential impacts to stormwater runoff and groundwater pollution. Comments requested information on details pertaining to the infiltration basins located on the proposed Project site and where any potential flooding or runoff would be directed. In addition, comments were received on the proposed Project's location within the 100-year Flood Hazard Area and how that location may potentially impact motorsports events and structures on site. A topical response has been prepared to address the issues raised in those comments.

Floodplain

Section 4.8, Hydrology and Water Quality, of the Draft EIR (page 4.8-2) notes the Federal Emergency Management Agency (FEMA) defines a floodplain as the area of land adjacent to the water course that may be submerged by flood water during a 100-year storm. The City's designated floodplain areas are

shown in Figure 4.8-1, FEMA-Designated Floodplain Areas, in the Draft EIR. The proposed Project site is currently located within FEMA's 100-year floodplain area.

FEMA defines a Flood Hazard Area as areas adjacent to water courses where potential flooding may negatively affect the urban development. The proposed Project site is currently located under FEMA's Flood Hazard Area Zone "AE," as shown in Figure 4.8-2, FEMA Flood Hazard Areas in the Draft EIR. Zone AE can be defined as areas subject to inundation by the 1 percent annual chance flood event.

Based on FEMA's standards, the City is subject to flooding from the Santa Ynez River to the north and east, and from back flow to the west. High flows from the Santa Ynez River cause short-term backups in the City's drainage system, resulting in agricultural land flooding to the west of Lompoc.[7] The Santa Ynez River is classified as Riverine-Intermittent-Temporary Flooded (R4USA), and off-site riparian areas to the west of the proposed Project site are classified as Palustrine Forested Intermittently Flooded (PFOJ). Lompoc Municipal Code subsection 15.48.080 F prohibits encroachments in the floodway, including fill, new construction, substantial improvement, and other new development, unless certification by a registered professional engineer or architect is provided demonstrating the encroachment shall not result in any increase in the base flood elevation during the occurrence of the base flood discharge. As discussed in Section 3.0 of the Draft EIR, the elevation of the proposed Project site would remain consistent with existing elevations on the site. Proposed Project design would adhere to the City's Building and Safety Code and the then current edition of the CBC during construction and operation to reduce potential flooding impacts on- and off-site. Per Goal 2 of the City's General Plan, Safety Element, the proposed Project would comply with development requirements within the floodway fringe. Therefore, impacts would be less than significant.

Water Quality

The Draft EIR, Section 4.8 (pages 4.8-17–18) notes the proposed Project site is currently vacant, with some debris (concrete slabs) remaining from prior uses. An area approximately 26,000 square feet (0.6 acres) is currently considered impervious. Two 10-inch storm drain pipes exist on site that empty from the Lompoc Airport to the bottom of the existing bank on the southern edge of the site. The proposed Project would be largely left flat and not have substantial grading that would alter the topography. The proposed Project site would be improved with additional impervious areas (approximately 233,000 square feet) to accommodate the drag strip and staging areas. The proposed Project site would be

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7 City of Lompoc*, General Plan Update Draft EIR,* Section 4.7 Hydrology and Water Quality; Federal Emergency Management Agency.

graded to direct stormwater from the edges of the site toward the center (see Figure 3.0-11, Conceptual Grading Plan, of the Draft EIR).

Section 3.0 of the Draft EIR (page 3.0-10), indicated surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road, as illustrated in Figure 3.0-11. All surface water runoff would be captured in those two areas, with no runoff draining to the Santa Ynez River. Infiltration Area A (see Figure 3.0-11) would cover an area approximately 44,300 square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet of stormwater. Area B would be approximately 34,500 square feet in size, with an average depth of 3.6 inches, and would contain approximately 10,270 cubic feet of stormwater. The proposed Project site consists of sandy loam and has been determined by percolation testing to have high percolation rates.

The two existing 10-inch drain pipes would be extended north from their current terminus under the proposed access road and would drain into the proposed infiltration areas. The concrete paved area for the drag strip, return road, and staging areas would also drain into the proposed infiltration areas (see Figure 3.0-11).

As the proposed Project would not increase stormwater flow off site and would direct all stormwater flow to infiltration areas on the proposed Project site, impacts would be less than significant.

Further, the proposed Project would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements. Construction activities would be subject to the NPDES general construction activity permit and would be required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters and consider the use of postconstruction permanent Best Management Practices (BMPs).

As noted in Section 4.8 of the Draft EIR (page 4.8-16), the proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application. Compliance with such requirements would reduce potential construction and postconstruction water quality impacts to less than significant.

Impacts would not occur to groundwater. As noted in the Draft EIR (page 4.8-17), the proposed Project site is located within the Lompoc Plain subbasin of the Santa Ynez River Basin.[8] Groundwater flows from east to west, generally along the direction of flow of the Santa Ynez River. The proposed Project involves development of motorsports recreational uses and a drag strip that would have limited impervious area.

Based on the current regulations of the Regional Water Quality Control Board (RWQCB) reflected in the City's Stormwater Management Program (SWMP), development and redevelopment projects within the City would be required to comply with the requirements in the Construction Activities Storm Water General Permit or with Central Coast Regional Water Quality Control Board approved requirements determined to be as effective.

The Draft EIR notes the proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume of the local groundwater table level. The proposed Project site would not impede the percolation of groundwater and would provide for surface water to be collected at two proposed infiltration areas.

As noted in the Draft EIR, the proposed Project would include the development of a shallow well (less than 100 feet deep) to access groundwater for the purpose of dust mitigation. That well would have a capacity of up to 200 gallons per minute (gpm) and would be used to fill a 5,000 gallon shallow reservoir on site. The relatively low capacity of the well and the need to use water on site solely for dust mitigation would not substantially affect water levels in the Santa Ynez River Valley Groundwater Basin.

The Draft EIR found that impacts would be less than significant.

TOPICAL RESPONSE 4: INDIRECT BIOLOGICAL RESOURCE IMPACTS

Indirect impacts could include potential dust impacts from construction and operation, indirect nighttime lighting impacts, and temporary elevated noise and vibration associated with construction and operation. A topical response has been prepared to address the issues raised in those comments.

The proposed Project site was previously disturbed and consists of abandoned industrial uses, including dirt roads, debris, and vegetation. As discussed elsewhere, no special-status plant species were documented to occur within the proposed Project vicinity, nor were they observed during site surveys.

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8 County of Santa Barbara, Public Works Department, Water Resources Division, Water Agency, *County of Santa Barbara Groundwater Basins Status Report* http://cosb.countyofsb.org/pwd/pwwater.aspx?id=51273, October 14, 2014.

In addition, the proposed Project site does not contain designated critical habitat for sensitive species, and supports relatively low-quality nesting habitat for wildlife species such as the southwestern willow flycatcher. Habitat-containing Arroyo Willow Thicket (AWT) and Coyote Brush Scrub (CBS) would remain intact outside of the proposed Project site. The most suitable vegetation for habitat occurs off site at the west side of the Lompoc Airport runway. That patch supports continuous willow canopy with dense foliage in the interior of the patch, especially in the lower strata. The patch appears to be located in a small basin that was dry during the protocol survey but may retain moisture during average rainfall years. Additional, off-site habitat is present along the north side of the Santa Ynez River, and to the west and east along the river.

As discussed in **Mitigation Measure MM 4.2-1** in Section 4.2, Air Quality, of the Draft EIR, a Fugitive Dust Control Plan shall be prepared and submitted to the City and Santa Barbara County Air Pollution Control District (SBAPCD) for review and approval before operation of the proposed Project if it were approved. Measures within the Fugitive Dust Control Plan include paved on-site access roads extending from George Miller Drive and V Street, open and riding trail areas limited to 14 off-highway-vehicles (OHVs) per hour and the requirement for all ground surfaces within OHV activities to be watered by an amended water agent to achieve a minimum control efficiency of 84 percent. The Fugitive Dust Control Plan would control emissions of airborne particulate matter to ensure the levels are below the 8 $\mu g/m^3$ SBAPCD threshold. Dust impacts to wildlife species were determined to be less than significant.

As discussed in Section 4.1, Aesthetics, of the Draft EIR and shown in Figure 4.1-8, Conceptual Lighting Plan, light intensity along the drag strip would be about 10 to 50 foot-candles (fc); and light intensity just beyond the drag strip would be about 1 to 10 fc. Light emitted beyond the proposed Project site's boundaries would only reach a maximum of 0 to 1 fcs. The majority of light projected off site is located on the northern Airport taxiway, and only a small portion is projected from the northwestern portion of the proposed Project site onto the Santa Ynez River bed. Additionally, motorsports events end at 10:00 PM; therefore, nighttime lighting is only needed for approximately 4–5 hours in the winter and 2–3 hours in the summer. Based on the low light intensity off site and the temporary nature of nighttime lighting, indirect lighting impacts would be less than significant and would not significantly affect wildlife species.

Noise levels from aircraft operations at the Lompoc Airport generate 65 dB(A) CNEL nearest to the Airport Runway 7/25 and 60 dB(A) CNEL to the south of Central Avenue to the north of the Santa Ynez River. CNEL is defined as the community noise equivalent level, which is the average A-weighted (dB[A]) sound level measured over a 24-hour period. Within the Lompoc Airport noise contours, the number of aircraft noise levels ranged from a low of 67.4 dB(A) during takeoff and landing to a high of 82.4 dB(A) during flight, as identified in Section 4.10, Noise (page 4.10-11), of the Draft EIR.

Following construction, OHV and dragstrip race events would occur, with noise levels ranging from 80 to 84 A-weighted decibels (dB[A]) at the proposed Project site, and from 76 to 80 dB(A), within the immediate adjacent habitat on the south and north of the river. Those noise levels would be approximately 15 to 20 dB(A) above the current airport operations. Those decibel levels will be temporary, occurring only during race events. In addition, due to the close proximity of the Lompoc Airport, wildlife species in and near the proposed Project site would be accustomed to the estimated noise levels. However, the buffer parameters stipulated in **Mitigation Measures MM 4.3-3** and **MM 4.3-4** as required by the CDFW include all environmental factors and take into account all contingencies to reduce impacts to sensitive species. If sensitive species are found, then those buffer parameters reduce impacts to potential habitat by providing buffers to limit the physical presence and potential disturbances from humans. Those guidelines do not specifically establish noise criteria; however, they do take into account all environmental factors, including noise. Furthermore, the motorsports sound is not continuous sound because events would occur during different times of day and night, with a maximum of 16 hours only on specialty drag race event days. The sound would occur intermittently, typically ranging between 2 and 9 hours per day for most events. As such, the motorsports events sound would be temporary and would not result in significant impacts to sensitive species. Impacts would be less than significant.

Potential indirect impacts from motorsports events were analyzed on a worst-case scenario. Operation of the proposed Project could occur every weekend (52 weekends) each year, or a total of 104 days. Accordingly, the largest events would only occur approximately 30 percent of the year.

As previously discussed, mitigation measures identified in the Draft EIR include implementing a Restoration and Mitigation Plan, conducting additional preconstruction surveys, implementing standard construction measures, and possibly requiring a Lake and Streambed Alteration Agreement with CDFW that could include additional conditions of approval.

It is expected wildlife species, if unable to habit the site or immediate surrounding area during construction or operation of the proposed Project, would be able to relocate to nearby habitat. Proposed Project operation, noise, vibration, dust, and lighting impacts would be temporary and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

TOPICAL RESPONSE 5: LAND USE COMPATIBILITY

Comments were received on the incompatible uses of the proposed Project within the Lompoc Airport Property and to nearby residential areas. Comments were also received on the proposed Project's inconsistencies with applicable land use plans, including the Airport Land Use Plan (ALUP), Draft Airport

Land Use Compatibility Plan (ALUCP), and Airport Layout Plan (ALP). A topical response has been prepared to address the issues raised in those comments.

As discussed in the Draft EIR (Section 4.9, Land Use), the proposed Project would be located within the northernmost portion of the Lompoc Airport Property, owned by the City of Lompoc.

City of Lompoc General Plan and Zoning

The Draft EIR (page 4.9-2 to 4.9-3) notes the proposed Project is currently designated under Community Facilities (CF) according to the City's General Plan Land Use Element (see Draft EIR Figure 4.9-3, Existing City Land Use Map). The purpose of Community Facilities is to provide areas that meet the public service, educational, recreational, social, and cultural needs for the Lompoc Valley Residents.

The City of Lompoc zoning requirements designates the proposed Project site as Public Facilities (PF), as shown in in the Draft EIR Figure 4.9-4, Existing City Zoning Map. The City of Lompoc Zoning Ordinance[9] establishes the general classes of use for (PF) zone. Areas zoned Public Facility areas are currently located next to various residential communities within the City and border the Lompoc Airport; therefore, the proposed Project's zone classification and location would be consistent with existing conditions. Accordingly, the Draft EIR (page 4.9-22) determined the proposed Project is consistent with the City's current land use designation and zoning requirements.

Airport Land Use Plan

The proposed Project includes features that may conflict with the ALUP, such as nighttime lighting fixtures and uses that would generate smoke and may otherwise affect safe air navigation. In addition, the proposed Project is located within the ALUP's Zone II Safety Area 2 – Approach Zone and Zone II Safety Area 3 – Traffic Pattern Zone.

Zone II: Safety Area

Safety Area 2 – Approach Zone: Transportation/communication/utility uses are permitted along with resource production/extraction/open space uses. A mix of commercial/retail trade uses are permitted, as well as a mix of outdoor recreation uses. Generally, no residential uses except single-family units are permitted, and no industrial/manufacturing uses except warehouse storage and miscellaneous manufacturing. No public and quasi-public services are permitted.

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9 City of Lompoc, Community Development Division, Chapter 50 Zoning Ordinance, art. 13, secs. 8501 and 8503.

Safety Area 3 – Traffic Pattern Zone: All Uses are permitted; however, most are subject to ALUC review.

The Draft EIR (page 4.9-22) notes the proposed Project is considered a recreational use and, as such, an allowable use within both Safety Areas 2 and 3. In addition, the Santa Barbara County Association of Governments (SBCAG), acting as the Airport Land Use Commission (ALUC), has reviewed the proposed Project, as part of the Notice of Preparation process.

The Draft EIR also indicates SBCAG noted, because the proposed Project is only seeking a Conditional Use Permit and only requires discretionary permit approval, and because it does not involve a General Plan amendment or rezone, a determination of consistency by the ALUC is not required. Even so, mitigation measures identified in the Draft EIR would reduce impacts related to land use incompatibilities with the Lompoc Airport by restricting structures' height, eliminating potentially hazardous skydive drop zone areas, and restricting skydive operation times.

The Draft ALUCP is currently in preparation, and as discussed in the Draft EIR, the proposed Project would have some inconsistencies. That is because the proposed Project would place approximately 1,250 persons in an area limited to occupancy of 1,000 within the Draft ALUCP's Zone 5 – Sideline Zone. Furthermore, the California Airport Land Use Planning Handbook "recommends a prohibition of stadiums and group recreational areas in the Sideline Zone," as discussed in Appendix 4.7B of the Draft EIR. However, the Draft ALUCP has not yet been adopted; therefore, the proposed Project is not required to comply with those proposed safety requirements. Even if the Draft ALUCP were to be adopted, State law authorizes the City Council to override any regulation in the ALUCP that may be inconsistent with the City's General Plan, with which the proposed Project is consistent.

The Draft EIR (page 4.9-33) determined impacts would be less than significant with the existing airport land use plans.

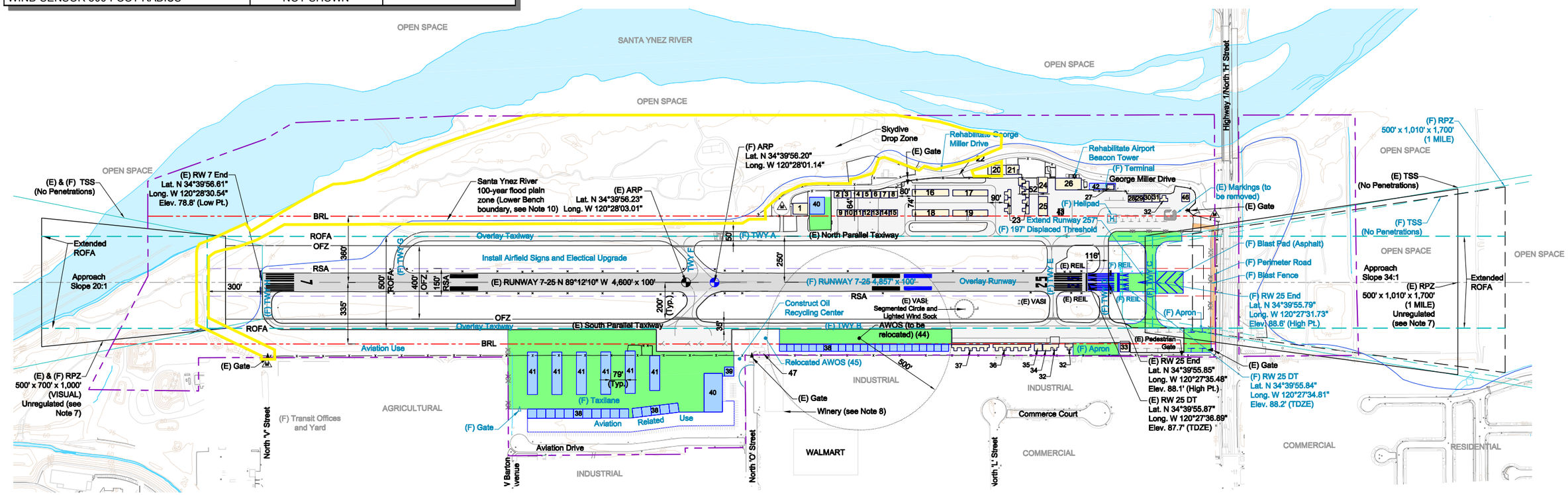
Airport Layout Plan

In 2011 the FAA approved the City's proposed ALP, which can be seen in **Figure 2.0-1, Airport Layout Plan**. The current ALP does not include any improvements in the area where the proposed Project is to be located. If the City decides to approve the proposed Project, then the ALP would need to be updated accordingly. Any updates to the ALP would be subject to review and approval of the FAA.

The Lompoc Airport Master Plan Update does not include any future improvements within the proposed Project's boundaries. Therefore, the proposed Project would not preclude any future Airport property improvements, and impacts would be less than significant.

LEGEND

DESCRIPTION	EXISTING	FUTURE
AIRPORT BOUNDARY		SAME
AIRFIELD PAVEMENT (RW/TW AND APRON)		
BUILDING RESTRICTION LINE (BRL)		SAME
RUNWAY OBJECT FREE AREA (ROFA)		
RUNWAY SAFETY AREA (RSA)		
OBSTACLE FREE ZONE (OFZ)		
RUNWAY PROTECTION ZONE (RPZ)		
BUILDINGS		
GROUND CONTOURS	65'	SAME
AIRPORT REFERENCE POINT (ARP)		
THRESHOLD SITING SURFACE		
FENCE	x x	xx xx xx x
ROAD		
ROTATING BEACON		SAME
MONUMENT		SAME
HOLDLINE		SAME
RUNWAY LIGHTS		
LIGHTED WIND SOCK		SAME
WIND SENSOR 500-FOOT RADIUS	NOT SHOWN	



Legend

Project Site

0 250 500 1000

APPROXIMATE SCALE IN FEET

SOURCE: City of Lompoc - February 2011

FIGURE **2.0-1**

Meridian Consultants

Airport Layout Plan

054-003-15

TOPICAL RESPONSE 6: MITIGATION AREA

Comments on the Draft EIR requested additional information on the required mitigation area, including its proposed location and the agencies responsible for the 7.1-acre mitigation area. A topical response has been prepared to address this issue raised in those comments.

In 2001, the City of Lompoc completed an expansion of Runway 7/25 ("Runway Expansion Project") to the west that resulted in the removal of nearby vegetation to accommodate air traffic operations. As a result of the Runway Expansion Project, a mitigation area was established off site, south of the Santa Ynez River, just due north of Runway 7/25. That mitigation area, which is approximately 7.1 acres, was set aside as mitigation to offset the loss of riparian woodlands and scrub communities as a result of the Runway Expansion Project. The location of the mitigation area is shown on Figure 4.9-1, Additional Existing and Proposed Land Uses, in the Draft EIR.

The restoration was undertaken twice in an area located north of the airport runway and south of the Santa Ynez River channel. The previous mitigation plantings required site preparation that included clearing of vegetation and nonnative weedy plants, and limited disking, all of which was completed. Prior restoration plantings included Fremont cottonwood (*Populus fremontii*) and elderberry (*Sambucus mexicanus*) as container plants, and cuttings of arroyo narrowleaf, leaf willow, and red willows (*Salix lasiolepis, S. exigua,* and S. *laevigata*, respectively). However, those plantings did not survive. Due to the failures of those plantings,, funds of approximately $76,000 were repaid to the City by the contractor responsible for that replanting. The City still has those funds.

If a determination is made the City remains obligated to again make efforts to accomplish those replantings as described in the Runway Expansion Mitigation pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW), then that funding is available for that.

As noted in the Draft EIR (page 4.9-36), implementation of the proposed Project would utilize the area set aside for Runway Expansion Mitigation Project.

Loss of the 7.1 acres on site would preclude the City from again providing for that replanting. If that mitigation is still required, then that would result in a significant impact.

Given the motorsports park would occupy most of the area initially identified to accomplish the restoration effort associated with the Airport Runway Expansion Project, the City would be required to reestablish a mitigation area at another location.

The Draft EIR (page 4.9-38) identifies the following mitigation measure if that replanting requirement is still applicable:

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

With implementation of **Mitigation Measure MM 4.9-7**, impacts related to the loss of the mitigation area would be reduced to less than significant.

It should be noted, if that replanting is still required, then any future mitigation site may be subject to review and approval by CDFW and would be subject to the conditions of SAA No. 5-2001-0252. CDFW may request additional conditions if an alternate location other than the original mitigation site is utilized.

TOPICAL RESPONSE 7: NOISE

This topical response has been prepared to address the comments received related to noise. Specifically, the comments expressed concerns related to methodology and compatibility with the City of Lompoc's General Plan Noise Element

Several comments were received on those issues related to the type and level of noise that would be generated by the proposed uses within the Motorsports Park ("Project Site"). This topical response provides clarifications and information related to the methodology developed to analyze potential noise impacts, the particular sources of noise most likely to affect uses surrounding the proposed Project site, and the various measures and alternatives considered in the Draft EIR that could reduce potential noise impacts generated by the proposed Project.

The primary characteristic of noise generated during proposed Project implementation would be from operation of a variety of drag strip, off-highway-vehicles (OHV), and non-racing events. The noise analysis provided in the Draft EIR analyzed the potential individual and cumulative effect of those events on areas adjacent to the proposed Project site. The study area used for modeling was limited to within the proposed Project vicinity where ambient measurements were taken. As shown in Figure 4.10-5 of the Draft EIR, the study area ranged from approximately 1.15 miles to the north, approximately 0.7 miles to the south, approximately 0.95 miles to the east, and approximately 1.0 mile to the west. The nearest residential sleeping facility to the proposed Project site is approximately 0.3 miles to the

southeast (residential area), approximately 0.4 miles to the south (hotel), and approximately 0.6 miles to the northeast (La Purisima Highlands).

Methodology

Existing Off-Site Roadway Noise Levels

Existing roadway noise levels were modeled using the Federal Highway Administration Highway Prediction Noise Model (FHWA-RD-77-108). The model calculates the average noise levels in dB(A) CNEL at a given roadway segment based on traffic volumes, vehicle mix, average speeds, roadway geometry, and site conditions. The noise model assumes a "hard" site condition (i.e., providing for the minimum amount of sound attenuated allowed by the traffic noise model, a 6.0 dB(A) noise reduction per doubling of distance), and no barriers between the roadway and receivers. Traffic noise levels were calculated for sensitive receptors at a distance of 75 feet from the center of the roadway. The average daily trips (ADTs) for those local roadway segments were obtained from the traffic impact analysis for the proposed Project prepared by Associated Transportation Engineers[10] (see **Appendix 4.13**).

Construction Noise

The construction noise modeled is based on information obtained from the Federal Transit Administration (FTA) Roadway Nosie Construction Model (RNCM). The FHWA has compiled data on noise-generating characteristics of specific types of construction equipment.[11] To identify the maximum construction noise impacts, under a reasonable worst-case scenario, it is assumed many pieces of heavy -duty equipment would operate simultaneously in close proximity to noise-sensitive receptors. In a realistic scenario, all construction equipment would not operate at the same time nor would their proximity be close to each other.

Equipment Utilized

The sound level meters (SLMs) used to conduct the ambient and simulated noise monitoring events were Type 1 (precision) Larson Davis Model 831 SLMs. Those meters meet all requirements of American National Standards Institute (ANSI) S1.4-1983 and ANSI1.43-1997 Type 1 Standards, as well as International Electrotechnical Commission (IEC) IEC61672-1 Ed. 1.0, IEC60651 Ed 1.2, and IEC60804 Type

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10 Associated Transportation Engineers, *Lompoc Motorsports Project Traffic, Circulation, and Parking Study,* (March 17, 2016).

11 Federal Highway Administration, Roadway Noise Construction Model (RNCM), Software Version 1.1 (December 8, 2008).

1, Group X standards. The SLMs were located approximately 5 feet above ground and were covered with a Larson Davis windscreen. The SLMs were field calibrated with an external calibrator prior to operation.

Ambient Noise Monitoring

As shown in Figure 4.10-4 of the Draft EIR, Noise Monitoring Locations, ambient noise measurements were undertaken to establish existing noise levels at various locations in the proximity to the proposed Project site. The monitoring was conducted to collect data on ambient noise sources within the proposed Project site, including road traffic and operation of the Lompoc Airport and Skydive Santa Barbara. Measurements were coordinated with Skydive Santa Barbara and were collected with aircraft takeoff/landing and without aircraft takeoff/landing to categorize the existing ambient noise environment. The monitoring area was comprised of several locations based on the proposed types of activities within the proposed Project site and potential changes in traffic associated with the proposed Project during operation.

As shown in Figure 4.10-5, Location of Sensitive Receptors, in the Draft EIR, noise measurements at nearby sensitive receptors were collected in accordance with guidance provided in the FTA document *Transit Noise and Vibration Impact Assessment.*[12] Sensitive receptors are identified as residences or places where people typically sleep and are designated as Category 2 in the *Transit Noise and Vibration Impact Assessment*.

Ambient noise monitoring was undertaken on Wednesday, February 17, 2016 to establish existing noise levels at various locations in proximity of the proposed Project site. The monitoring was conducted to collect data on ambient noise sources within the proposed Project site. As discussed in Section 4.10 of the Draft EIR, monitoring was conducted at five locations through a series of short-term (15-minute) measurements for the AM peak hours (7:00 AM to 9:00 AM). Some measurements were outside of the AM peak hour as one meter was used throughout the measurement period to collect data. Data collection occurred over 4 hours and; therefore, certain measurements were collected outside the AM peak hour. The following locations included:

1. Site 1 is located on the northwest corner of Central Avenue and H Street, southeast of the proposed Project site. The closest residences are located approximately 700 feet to the east and west along Central Avenue. In addition, residences are located along Central Avenue and H Street/State Route 1 where the dominant noise sources includes vehicular traffic and aircraft

12 Department of Transportation, *Transit Noise and Vibration Impact Assessment,* May 2006. http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

operations from Lompoc Airport and Skydive Santa Barbara. Measurements at Site 1 were taken from 9:03 AM to 9:18 AM.

2. Site 2 is located on the corner of George Miller Drive and H Street, east of the proposed Project site. The closest sensitive receptor (hotel) is located approximately 900 feet to the south along North H Street/ SR 1. The dominant noise source in this area include vehicular traffic along North H Street and aircraft operations from Lompoc Airport. In addition, three (3) small airplanes took off from the runway between the time period 8:38 AM to 8:47 AM. Measurements at Site 2 were taken from 8:35 AM to 8:51 AM.

3. Site 3 is located along the Alan Hancock College Bike Path, north of the Project site. Site 3 is surrounded with vacant agricultural land with the nearest residences located approximately 1,500 feet to the east. The dominant noise source in this area included agricultural equipment and aircraft operations from Lompoc Airport. Measurements at Site 3 were taken between 9:57 AM and 10:12 AM.

4. Site 4 is located along North H Street/SR 1, north east of the Project site. The closest residences are located within the La Purisima Highlands neighborhood approximately 225 feet to the east along North H Street/SR 1. The dominant noise source in this area included vehicular traffic along North H Street/SR 1 and aircraft operations from the Lompoc Airport. It is important to note, noise measurements at Site 4 were conducted between 7:54 AM and 11:34 AM. During this time period, noise levels from aircraft takeoff from Skydive Santa Barbara were captured at 8:13 AM.

5. Site 5 is located in an agricultural/dairy farm, west of the proposed Project site. Site 5 is covered by a large agricultural field to the south. The closest residences are located approximately 150 feet to the north. The dominant noise source in this area included agricultural equipment and aircraft operations from the Lompoc Airport. Measurements at Site 5 were taken between 9:32 AM to 9:47 AM.

In addition, noise monitoring was undertaken on Wednesday, March 30, 2016 to establish existing noise levels from flight operations generating from Skydive Santa Barbara. As shown in Section 4.10, Table 4.10-4 of the Draft EIR (page 4.10-11), aircraft takeoff, flight, and landing noise measurements were taken at Site 4 between 10:51 AM to 12:28 PM.

Drag Strip Vehicle Noise Intensity

To assess the anticipated noise levels from the drag strip portion of the proposed Project, several measurements were conducted on the proposed Project site on February 17, 2016, between 10:47 AM

and 11:18 AM. To quantify specific engine noise from the types of vehicles that would use the drag strip, controlled vehicle engine tests were conducted. Four types of race vehicles were brought on site that ranged from 2,000 to 3,500 pounds in weight and 450 to 700 horsepower, respectively.

A SLM was placed approximately 15 feet from the individual test vehicle and engines were accelerated and decelerated for 5 minutes to simulate race conditions. An additional SLM was placed off-site (Site 4 as shown in Figure 4.10-5 in the Draft EIR) during the simulations to account for noise attenuation from the proposed Project site.

The 5-minute simulation was completed for four separate times for each test vehicle (a total of 16 test simulations). The vehicles remained stationary while the engines were accelerated and decelerated. An additional simulation was conducted that included the simultaneous acceleration and deceleration of the two loudest race vehicles (532 and 632 horsepower) to simulate drag race conditions. Noise measurements onsite of the simultaneous acceleration and deceleration of the two loudest race vehicles had a peak maximum noise level of 104.6 dB(A). Furthermore, the noise levels measured with the additional SLM at Site 4 during the controlled vehicle engine tests were 63.4 dB(A).

SoundPLAN Noise Model

Noise impacts that would be generated by implementation of the proposed Project were assessed using modeling techniques to estimate the potential increase in noise that would result from operation of the proposed Project. As discussed in Section 4.10 of the Draft EIR (page 4.10-28), the SoundPLAN noise model was utilized to calculate noise impacts from the operation of the proposed Project to sensitive receptors near the proposed Project site. The SoundPLAN model accounts for various inputs to analyze the topography; weather; vegetation; vehicle traffic; existing and proposed noise sources; propagation from buildings; and barriers to depict noise contours at varying distances.

The SoundPLAN model can include real world noise levels and contains noise data in a reference library. The OHV noise levels utilized in the model included noise levels of 114.2 dB(A) per vehicle at a pass-by distance of 100 feet.

It is important to note the measured noise for the on-site drag strip vehicle noise tests resulted in a peak maximum level of 104.6 dB(A), lower than the reference source in the SoundPLAN reference library. Therefore, the noise source from the SoundPLAN reference library was used to simulate a worst-case condition.

As discussed in Section 4.10 of the Draft EIR (page 4.10-28), the SoundPLAN noise model included the following assumptions and combinations for the various types of motorized events anticipated from the proposed Project to occur on site,:

Drag Strip Racing

- Two (2) vehicles were simulated for a distance of 1,775 feet along the proposed drag strip. Noise levels for each vehicle were 114.2 dB(A) at a pass-by distance of 100 feet.

Drag Strip Racing and OHV Trail Ride Area

- Two (2) vehicles were simulated for a distance of 1,775 feet along the proposed drag strip. Noise levels for each vehicle were 114.2 dB(A) at a pass-by distance of 100 feet.
- The proposed OHV Trail Ride area was defined as an area source with a noise level of 114.2 dB(A) at a pass-by distance of 100 feet.

OHV Riding

- 10 vehicles with a noise level of 114.2 dB(A), each at a pass-by distance of 100 feet, were equally spread within the oval track layout.
- 14 vehicles with a noise level of 114.2 dB(A), each at a pass-by distance of 100 feet, were equally spread within the endurocross layout.
- 8 vehicles with a noise level of 114.2 dB(A), each at a pass-by distance of 100 feet, were equally spread within the arena cross layout.
- 24 vehicles with a noise level of 114.2 dB(A), each at a pass-by distance of 100 feet, were equally spread within the motocross/mud bog and sand drag lanes.

To simulate the maximum motorized events under a worst-case scenario, it is assumed those events would be operating continuously between 7:00 AM to 10:00 PM.

Stationary Sources

As discussed in Section 4.10 of the Draft EIR (page 4.10-28), other stationary noise sources were evaluated by identifying noise levels from stationary sources such as noises from pedestrians and a public address (PA) system. Noise during those events is highly variable and dependent on the type and level of activity within the proposed Project site. The Draft EIR (page 4.10-28) notes from observations and measurements at similar facilities and events, the following assumptions were made:

- PA systems can create higher sound levels than typical crowd reactions. PA noise (commentary, announcements, etc.) occurs far more often than crowd cheers. However, a typical motorsports park event would not likely use the PA system for more than just spoken content. As such, impacts from PA systems would be minimal and have been incorporated into the analysis.
- Cheering is highly variable, depending on the particular moment-to-moment activity.

Overall, those sources are part of the traffic and operation noise source and as such contribute to the overall noise emanating from the proposed Project.

Generator Noise

As shown in Section 4.10 of the Draft EIR (Figure 4.10-7), noise levels associated with onsite generators would range between 72 to 82 dB(A) at 50 feet. Those noise sources would be primarily located internal to the proposed Project site. The 72 to 82 dB(A) noise levels would occur primarily in the proposed Parking Areas and along the pedestrian path within the proposed Project site.

Summary

As shown in Section 4.10 of the Draft EIR (page 4.10-36), the highest increases occurred during the proposed Drag Strip Racing and OHV Trail ride events, with exterior noise levels increased by 2.2 dB(A) at nearby sensitive receptors when compared to the existing noise levels. The noise level from the proposed Project would increase existing noise levels by less than 3 dB(A), which is the range in the change in noise levels that is generally perceptible level that human hearing can detect. The Draft EIR determined, based on the increase being less than the 3 dB(A), noise during the operational phase would result in a less than significant impact.

City of Lompoc General Plan Noise Element

Comments were raised regarding consistency of the proposed Project to policies contained within the City's General Plan Noise Element. This topical response has been prepared to address those comments.

The policies applicable to the proposed Project as identified in the Noise Element include:

- Policy 1.1 requires each land use maintain noise levels at their property line in compliance with City standards
- Policy 1.2 requires a priority upon control of noise at the noise source.
- Policy 2.1 requires noise standards presented in table entitled "Interior and Exterior Noise Standards" in determining land use designations and maximum noise levels allowable for new

developments. In situations of overlapping Noise Standards, the lower noise level standard shall apply, unless it can be found the circumstances of the proposed Project would allow for a less conservative interpretation based on the specific type of use, the benefits of the proposed Project, and the ability to mitigation noise impacts.

- Policy 2.3 requires minimization of noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan
- Policy 2.4 requires enforcement of the City Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line.

Section 4.10 of the Draft EIR provides reference to the City of Lompoc 2030 General Plan Noise Element. As shown in Table 4.10-7 of the Draft EIR (page 4.10-22), the City's General Plan Noise Element contains noise guidelines and policies that establish noise levels for different land uses.[13]

As indicated in the 2030 General Plan Noise Element, the maximum exterior sound level acceptable for commercial and industrial areas, specifically for manufacturing and agricultural is 75 dB(A) Ldn, for retail and restaurant is 65 dB(A) Ldn, for motel is 60 dB(A) Ldn and for residential areas, specifically, single-family is 60 dB(A) Ldn. The maximum acceptable interior noise level for manufacturing and agricultural is 65 dB(A) Ldn, retail and restaurant is 55 dB(A) Ldn motel is 45 dB(A) Ldn and for single-family is 45 dB(A) Ldn.

Further, the Draft EIR (page 4.10-24) identifies and incorporates the City's Noise Ordinance into the analysis. Consistency with the City's Noise Ordinance ensures consistency with Policy 1.1 and 1.2 of the General Plan Noise Element. Currently, the Noise Ordinance does not include quantitative standards or thresholds of significance for construction noise, steady-state sources of noise, and periodic sources of noise such as vehicle loading. It does address noise sources originating from businesses and includes various standards to consider whether a violation occurs. Those standards include intensity, the nature of the source, the origin of the source, background noise, proximity to residential sleeping facilities, zoning of the area of the source, time the noise occurs, duration of noise, whether it is recurrent, intermittent, or constant and if it produced by a commercial or noncommercial activity.

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13 City of Lompoc, *2030 General Plan,* "Noise Element."

Event Noise

As discussed in Section 3.0 and Section 4.10 (page 4.10-35), the Drag Racing scenario would include two vehicles and would take place approximately 20 times per hour, with race duration lasting approximately 5 to 12 seconds. Noise levels would last between 100 seconds (1.5 minutes) to 240 seconds (3 minutes) in each hour, or a total of 27 to 64 minutes during an event day between 6:00 AM and 10:00 PM, when lights are installed.

The Drag Strip/OHV Trail Ride Area scenario would include drag strip activities and OHV activities in the trail ride area. Similar to the Drag Strip only scenario, noise levels would range between 1.5 to 3 minutes in each event hour, or a total of 27 to 64 minutes during an event day.

The OHV Riding scenario includes OHV activities within the oval track, motocross, endurocross, and arenacross riding. The oval track would feature 10 OHVs and would take place 6 times per hour, with race duration lasting approximately 2 minutes each. Noise levels would last approximately 12 minutes in each hour, or approximately 168 minutes (2.8 hours) each event day, which is 14 hours long. The arenacross would feature 8 OHVs and would take place 5 times per hour, with race duration lasting approximately 10 minutes each. Noise levels would last approximately 50 minutes in each hour, or approximately 700 minutes (11.7 hours) each event day. The motocross would feature 24 OHVs and would take place approximately 4 times per hour lasting approximately 15 minutes each. Endurocross would feature 16 OHVs and would take place approximately 4 times per hour lasting approximately 15 minutes each. Noise levels during both the motorcross and endurocross could last for the full event day during each hour.

As discussed in Section 4.10, the Off-Highway Motor Vehicle Recreation Act of 2003[14] establishes standards for regulating noise levels generated from the operation of motor vehicles. Specifically, OHVs manufactured on or after January 1, 1998, shall be limited to not more than 96 dB, and if manufactured prior to January 1, 1998, to not more than 101 dB, when measured from a distance of 20 inches. As the facility would be able to control the use of vehicle, it was assumed they would prohibit any vehicles retrofitted with after-market mufflers and that did not meet manufacturers' specifications.

The Draft EIR indicated a significant impact would occur if proposed Project operations cause the exterior noise levels at a lot property line for a noise-sensitive use to exceed 60 dB(A) where ambient noise levels are below 60 dB(A) CNEL or proposed Project operations cause the ambient noise level

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14 California Vehicle Code, sec. 38370(h) (2003).

measured at the property line of the affected noise-sensitive uses to increase by 3 dB(A) where the existing exterior noise level already exceeds the City's exterior noise standard. As noted in Section 4.10 of the Draft EIR (Table 4.10-10, Table 4.10-11, and Table 4.10-12), offsite noise level increases at nearby sensitive receptors would be 2.0 dB(A) for the OHV Riding (spring) scenario and 2.2 dB(A) for both the Drag Strip Racing and Drag Strip Racing/OHV Trail Ride Area (spring) scenarios.

Consistent with the standards in the City's Noise Ordinance, the proposed Project would operate between 6:00 AM and 10:00 PM on the weekends and after 4:00 PM on the weekdays. Noise from use of the site by motorized vehicle and other sources could occur from several minutes over the course of an hour up each event day.

As mentioned in the Topical Response for Land Use Compatibility, the proposed project is considered a recreational activity (noncommercial) located within a Public Facility Zone. Increase in noise levels have been estimated (see discussion on methodology and modeling above) to be below the 3 dB(A) when ambient noise levels are above 60 dB(A) exterior standards. As previously indicated, the City's exterior noise threshold is 60 dB(A) for motel and single-family uses and the interior noise threshold is 45 dB(A) for these same uses. As such, the Project would be consistent with Policy 1.1, Policy 2.1, and Policy 2.4 of the Noise Element in compliance with City standards.

Construction Noise

As mentioned in Section 4.10 of the Draft EIR (page 4.10-29-30), recommended noise attenuation techniques and proposed Project Design Features are listed for implementation during the proposed Project's related construction activities to minimize or avoid potential noise impacts to nearby sensitive receptors. Those recommendations are consistent with Policy 1.2 of the Noise Element, which includes construction best management practices (BMPs) to be implemented by contractors to reduce construction noise levels. Furthermore, operation of the proposed Project would be required to meet the levels established in the Off-Highway Motor Vehicle Recreation Act of 2003 for regulating noise levels generated from the operation of motor vehicles. Accordingly, the proposed Project would be consistent with Policy 1.2.

Roadway Noise

The proposed Project interior noise levels would be attenuated by 17 to 25 dB(A) from outdoor noise levels with the windows closed and open. As mentioned in Section 4.10 of the Draft EIR (page 4.10-32), the maximum roadway noise levels occur along N. H Street north of George Miller Drive and are approximately 67.4 dB(A). It should be noted residential uses along Central Avenue and N. H Street are separated from adjacent roadways by 5-foot-high masonry walls which would further attenuate noise

levels by 5 dB(A).[15] In addition, those residential uses are also separated by a planted buffer strip, providing a reduction of 3 to 5 dB(A) per 100 feet.[16] Assuming minimum attenuation of 5 dB(A) associated with the solid walls and 3 dB(A) from the plantings, interior noise levels would be below the 45 dB(A) threshold for residential, commercial, and industrial uses with the windows open and closed. As such, the proposed Project would be consistent with Policy 2.1 of the Noise Element and not exceed the interior and exterior noise standards.

Mitigation Measures

Mitigation measures have been identified to reduce impacts by restricting structures' heights, eliminating potentially hazardous skydive drop zone areas, and restricting skydive operation times so proposed land use conflicts associated with the proposed Project do not occur. Noise levels emanating from the proposed Project site would fall within City standards. Accordingly, the proposed Project would be consistent with Policy 2.3.

Conclusion

As identified in Section 4.10 of the Draft EIR, construction activities would occur within the least noise-sensitive portion of the day, between 7:00 AM and 9:00 PM, in accordance with the Lompoc Municipal Code. Furthermore, best management practices would be implemented during construction to the extent feasible. As such, construction impacts would be less than significant.

As identified in Section 4.10 of the Draft EIR, a significant impact would occur if proposed Project operation cause(i) the exterior noise levels at a lot property line for a noise-sensitive use to exceed 60 dB(A) where ambient noise levels are below 60 dB(A) CNEL or (ii) the ambient noise level measured at the property line of the affected noise-sensitive uses to increase by 3 dB(A) where the existing exterior noise level already exceeds the City's exterior noise standard. As analyzed in Section 4.10 of the Draft EIR, operational noise impacts were determined not to exceed thresholds and therefore, impacts would be less than significant. Further, the Draft EIR determined the proposed Project would be consistent with the applicable Policies.

TOPICAL RESPONSE 8: SKYDIVE LANDING ZONE

Comments were received on the proposed Project's potential impacts to the existing operations of Skydive Santa Barbara (SDSB), located at the Lompoc Airport. Concerns were raised regarding how the

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15 Federal Highway Administration, *Highway Noise Fundamentals* (1980), 18.

16 Federal Highway Administration, *The Audible Landscape.*

proposed motorsports park would affect the existing skydiving activities and drop zone. A topical response has been prepared to address the skydive and drop zone issues raised in those comments.

As noted in the comments, SDSB operates from the Lompoc Airport and currently utilizes an area approximately 250 feet wide and 500 feet long for a pea gravel landing area. As identified in the 2011 Federal Aviation Administration (FAA)–approved Airport Layout Plan (ALP), a specific skydive landing area is not distinguished. Instead, the ALP shows an arrow directed at a general area within the eastern portion of the proposed Project site. SDSB operates 7 days a week, closing only on Christmas Day. During the last calendar year, SDSB flew 1,941 loads and completed 20,846 drops. In addition, SDSB is considered one of the leading tandem operations in southern California with 8,300 tandem jumps completed in 2015.

The proposed Project provides for maintaining skydive operations and includes two drop zones. As noted in Section 3.0, Project Description, of the Draft EIR, the proposed drop zones include an irregularly shaped area of 275 feet by 500 feet, or an approximate area of 137,500 square feet, relocated to the eastern portion of the proposed Project site, adjacent to and west of the proposed trail ride area. Improvements to the proposed drop zone area include vegetation clearance. The second drop zone proposed would be 250 feet by 600 feet, or an approximate area of 150,000 square feet, with a trapezoidal northwest corner, located at the west end of the runway to meet the size requirements for sanctioned, United Parachute Association Class B and Class C license holders.

As noted in the Draft EIR, the applicant has identified the 250-by-600-foot trapezoidal drop zone located at the western end of Runway 7/25 as a potential hazard and a significant impact. As such, the Draft EIR Section 4.9, Land Use, suggests that this drop zone be eliminated (see **Mitigation Measure MM 4.9-4**).

In addition to the removal of the 250-by-600-foot drop zone proposed at the west end of Runway 7/25, the proposed Project would relocate the existing skydive drop zone to an area to the east and north of the fenced airport property, and slightly to the east of its current location.

The ALP for Lompoc Airport identifies an area north of the security fence and south of the Santa Ynez River as a drop zone for skydiving purposes. However, as mentioned above, the ALP does not designate the size or provide any parameter for the drop zone on the ALP. The City of Lompoc has recently defined the area of the existing drop zone as 190,000 square feet, and its location is shown on **Figure 2.0-2, Existing Sky Dive Landing Area**, of the Final EIR. As proposed in the Draft EIR and previously noted, the current drop zone was 125,000 square feet, and the relocated drop zone would be 137,500 square feet. Accordingly, the relocated drop zone would be 12,500 square feet larger than the current drop zone.

Title 14 of the Code of Federal Regulations (CFR), Part 105,[17] governs parachute operations in the United States, except those conducted for in-flight emergency or military operations in uncontrolled airspace. FAA Advisory Circular 105-2D, Sport Parachuting,[18] emphasizes that the FAA recognizes sport parachuting, or skydiving, as an aeronautical activity and that airports accepting federal funding need to accommodate the activity unless the FAA deems it incompatible. Under the Skydiver Safety section of the Advisory Circular, the FAA recommends parachute landing areas (PLAs) "remain unobstructed, with sufficient minimum radial distances to the nearest hazard." As noted in FAA Circular DOT/FAA/AR-1130, landing zones (i.e. drop zones or PLAs) have minimum requirements that vary depending on the classification of the parachute activity. For students/training, the minimum PLA is 338,000 square feet; for tandem jumpers, the minimum PLA is 84,500 square feet; and for all other activities, the PLA is 5,000 square feet.

Lompoc Airport is subject to FAA review for parachuting as a result of accepting funds for the previous runway expansion in 2003.

The Draft EIR (pages 4.9-35–36) states:

> *Relocating the DZ to the western end of Runway 7/25 would result in potentially significant impacts because of potential risks for skydivers to miss the landing area and potentially interfere with Airport operations. That is especially true if skydiving activities occur outside the days noted on FAA Form 5010 Airport Master Record currently in place for LPC. Those impacts would be potentially significant.*

The Draft EIR includes the following mitigation measure to reduce that significant impact:

MM 4.9-4 The applicant shall either:

- Eliminate the proposed sky diving drop zone (DZ) area on the western end of Runway 7/25 prior to operation of the proposed Project; or
- Identify an alternative location for use as a DZ outside of any FAA restrictive use zones (i.e., Approach/Departure or Transitional Zones) for the proposed DZ area on the western end of Runway 7/25 prior to operation of the proposed Project; or

17 Federal Aviation Administration (FAA), Code of Federal Regulations (CFR), tit. 14, pt. 105.

18 Federal Aviation Administration (FAA), Advisory Circular 105-2D, Sport Parachuting, May 18, 2011.

- For any DZ located with a designated FAA restrictive use area, the City shall submit a request to FAA for review and approval of such use and incorporation into the Airport Layout Plan (ALP) prior to prior to operation of the proposed Project.

With regard to the relocated drop zone north of the security fence area, the Draft EIR (page 4.9-35) states:

> *Reconfiguring the area currently available to skydivers from 250 feet wide and 500 feet long to the irregularly shaped 275 feet by 500 feet wide area would not result in significant impacts because the proposed Project is not proposing a reduction in size. In addition, the western proposed DZ (250 by 600 feet) would not result in a reduction in area for skydive landing. The proposed relocated DZ is considered an acceptable location under the FAA Guidelines. However, relocation of the DZs increases the risk for "cutaways" or faulty chutes that have been detached to drift across active airport operation areas putting both the skydivers and aircraft at risk. Transient pilots, those who are not based or familiar with the airport, are of special concern to those risks as they may not be as familiar with the airport's operations, including skydiving, or its adjacent facilities.*

Further, the Draft EIR (page 4.9-38) notes: "For any DZ located with a designated FAA restrictive use area, the City shall submit a request to FAA for review and approval of such use and incorporation into the Airport Layout Plan (ALP) prior to prior to operation of the proposed Project." (see **Mitigation Measure MM 4.9.4**).

The Draft EIR concludes, because the relocation of the skydiving drop zone is subject to FAA review and approval, if approved, then the proposed Project would comply with FAA regulations for PLA and, as such, would result in less than significant impacts to skydiving operations at the Lompoc Airport. Further, by maintaining skydiving operations at the airport, there would not be any impact to the existing skydiving operations.

SOURCE: City of Lompoc - 2016

FIGURE **2.0-2**

Meridian Consultants

Existing Skydive Landing Area

054-003-15

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS
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Planning Division

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July 13, 2016

Ms. Lucille Breese
City of Lompoc
Economic Development Department
Planning Division
100 Civic Center Plaza
Lompoc, California 93436

Dear Ms. Breese:

Re: Draft Environmental Impact Report for Lompoc Motorsports Project; SCH# 2015121005

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposed project would allow development of a recreational motorsports facility on approximately 38 acres of land within the Lompoc Airport property boundary. The project site is located approximately 325 feet north of Lompoc Airport's, Runway 7/25 centerline. The project site is on airport property that would be developed with new, non-aeronautical land uses such as, off-highway vehicle areas, an oval dirt track, a hot rod drag racing strip with grandstands and pit areas, and other trail-riding areas. Several structures for customer services, meetings, concessions, storage, event seating, lighting, and restrooms along with new access and circulation roads, parking, and fencing are also planned for this project. Grandstand seating for 1,250 people, picnic and playground areas, as well as other viewing areas and concessions will be 75 feet from the north side airport taxiway.

In accordance with CEQA, Public Resources Code Section 21096, the California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that should be applied to all public use airports and is available on-line at http://dot.ca.gov/hq/planning/aeronaut/documents/alucp/AirportLandUsePlanningHandbook.pdf

1-1

Protecting people and property on the ground from the potential consequences of near-airport aircraft accidents is a fundamental land use compatibility-planning objective. While the chance of an aircraft injuring someone on the ground is historically quite low, an aircraft accident is a

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Ms. Breese
July 13, 2016
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high consequence event. To protect people and property on the ground from the risks of near-airport aircraft accidents, some form of restrictions on land use is essential. The two principal methods for reducing the risk of injury and property damage on the ground are to limit the number of persons in an area and to limit the area covered by occupied structures. The potential severity of an off-airport aircraft accident is highly dependent upon the nature of the land use at the accident site.

The Handbook identifies six airport safety zones based on risk levels. The project site appears to be within Safety Zone 5 and the Runway Protection Zone (RPZ) as defined in the Handbook. The RPZ is the most critical of the airport safety zones, considered to be at "very high risk" due to its proximity to the end of the runway. The Handbook generally recommends prohibiting all new structures within the RPZ. Just beyond the RPZ is the Inner Approach/Departure Zone, which is considered to be at "substantial risk." The RPZ together with the inner safety zones encompass 30 to 50 percent of the near-airport aircraft accident sites. The Handbook's basic compatibility policies for an RPZ state that parking lots and roads should be avoided and that uses on airport property be subject to Federal Aviation Administration (FAA) standards. Group recreational and stadium uses are generally prohibited in Safety Zone 5. These land use compatibility concerns must be thoroughly addressed through the environmental process. 1-1

The project site is adjacent to the runway environment and should meet airport design standards in accordance with FAA Advisory Circular 150/5300-13A - Airport Design. Since Lompoc Airport is part of the National Plan of Integrated Airport Systems and receives federal funds, it is required that use of land on airport or in the immediate vicinity of the airport be restricted to activities and purposes compatible with normal airport operations. The airport should also coordinate with the FAA to ensure compliance with their grant assurances. 1-2

The Advisory Circular 150/5300-13A, also contains guidance pertaining to land uses within the RPZ. The RPZ is further broken down into two areas: "The Central Portion of the RPZ" and "the Controlled Activity Area."

California Public Utilities Code (PUC) Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces. The FAA Advisory Circular 150/5370-2E "Operational Safety on Airports During Construction" should be incorporated into the project design in order to identify any permanent or temporary construction-related impacts (e.g. construction cranes, etc.) to the airport imaginary surfaces. This advisory circular is available at http://www.faa.gov. This proposed project will require submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to FAA in accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace." Form 7460-1 is available on-line at https://oeaaa.faa.gov/oeaaa/external/portal.jsp and should be submitted electronically to the FAA. 1-3

Due to its proximity to the airport, the project site may be subject to aircraft overflights and subsequent aircraft-related noise impacts. Since communities vary greatly in size and character from urban to rural, the level of noise deemed acceptable in one community is not necessarily the same for another community. 1-4

Ms. Breese
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Business and Professions Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353 address buyer notification requirements for lands around airports and are available on-line at http://www.leginfo.ca.gov/calaw.html. Any person who intends to offer subdivided lands, common interest developments and residential properties for sale or lease within an airport influence area is required to disclose that fact to the person buying the property. 1-5

PUC Section 21688 states that "no payments shall be made from the Aeronautics Account for expenditure on any airport or for the acquisition or development of any airport, if the department determines that the height restrictions around the airport are inadequate to provide reasonable assurance that the landing and taking off of aircraft at the airport will be conducted without obstruction or will be otherwise free from hazards." The airport-owner must have sufficient control over obstructions in the airspace in the vicinity of the airport to assure that height restrictions can be maintained. This control may be in the form of ownership of any land from which obstructions may rise, air navigation (avigation) easements to guarantee maintenance of restrictions, or height limitation or land use zoning which will prohibit obstructions which would violate the obstruction standards. 1-6

Land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. The FAA recommends that landfills, wastewater treatment facilities, surface mining, wetlands and other uses that have the potential to attract wildlife, be restricted in the vicinity of an airport. FAA Advisory Circular (AC) 150/5200-33B entitled "Hazardous Wildlife Attractants on or Near Airports" and AC 150/5200-34 entitled "Construction or Establishment of Landfills Near Public Airports" address these issues. For further information, please refer to the FAA website: http://www.faa.gov/airports/airport_safety/wildlife/. For additional information concerning wildlife damage management, you might also contact the United States Department of Agriculture, Wildlife Services, at (916) 979-2675. 1-7

In accordance with PUC Section 21676 *et seq.*, prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission (ALUC), the local agency shall first refer the proposed action to the ALUC.

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency's governing body shall provide to the ALUC and the Division a copy of the proposed decision and findings. The Division reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. The Division specifically looks at the proposed findings to gauge their relationship to the overrule. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the local agency is minimizing "...the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses." 1-8

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In addition to submitting the proposal to the ALUC, it should also be coordinated with airport staff to ensure that the proposal will be compatible with future as well as existing airport operations. 1-9

The protection of airports from incompatible land use encroachment is vital to California's economic future. Lompoc Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports is both a local and State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors. 1-10

The Draft Environmental Impact Report (DEIR) for this project contains an embedded Internet link to the City of Lompoc's webpage which lists environmental notices for projects that are open for public review. The DEIR is not listed or available for review on the webpage but the Notice of Preparation from last year is still posted there. Please be sure that the public has been given proper notice and a full review period required under CEQA for this project and its environmental document. 1-11

These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 5 office concerning surface transportation issues. 1-12

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact me at (916) 654-6223, or by email at philip.crimmins@dot.ca.gov.

Sincerely,

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, Santa Barbara County ALUC, Lompoc Airport, FAA

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter No. 1: Philip Crimmins, Aviation Environmental Specialist, California Department of Transportation, July 18, 2016

Response 1-1

The City of Lompoc recognizes the role of the Division of Aeronautics in airport-related compatible land use issues and acknowledges the *California Airport Land Use Planning Handbook* published by the Division of Aeronautics should be utilized as a resource in the preparation of environmental documents for projects within airport comprehensive land use plan boundaries.

In the case of the Lompoc Airport, and to reduce the risk of airport-related safety hazards, land uses and development proposals near the airport are reviewed by the Airport Land Use Commission (ALUC) for consistency with the Santa Barbara County Airport Land Use Plan. The Santa Barbara County Airport Land Use Plan is consistent with the consideration of land use compatibility issues outlined in the *California Airport Land Use Planning Handbook*. According to the most recent Airport Land Use Plan applicable to Lompoc Airport and the draft plan currently being prepared, the existing and future land uses around the airport associated with the proposed Project are considered safe land uses.

The Draft EIR addresses concerns related to the placement of uses in the various safety zones identified by the comment in Topical Response 5, Land Use Compatibility, and Topical Response 1, Airport Safety.

Response 1-2

FAA Circular 150/5300-13A, *Airport Design*, recommends the standards and recommendations in that Advisory Circular (AC) for use in the design of civil airports. In general, use of the AC is not mandatory. The standards and recommendations contained in the AC may be used by certificated airports to satisfy specific requirements of Title 14 Code of Federal Regulations (CFR) Part 139, Certification of Airports, subparts C (Airport Certification Manual) and D (Operations). Use of the AC is mandatory for all projects funded with federal grant monies through the Airport Improvement Program (AIP) and/or with revenue from the Passenger Facility Charges (PFC) Program.

Topical Response 5, Land Use Compatibility, also addresses airport land use concerns.

Response 1-3

FAA Circular 150/5370-2E, Operational Safety On Airports during Construction, sets forth guidelines for operational safety on airports during construction. The AC notes Hazardous practices and marginal conditions created by construction activities can decrease or jeopardize operational safety on airports. To minimize disruption of normal aircraft operations and to avoid situations that compromise the airport's operational safety, the airport operator must carefully plan, schedule, and coordinate construction activities. An airport operator, in this case the City of Lompoc, has overall responsibility for

construction activities on at Lompoc Airport. That includes the predesign, design, preconstruction, construction, and inspection phases. The AC places on the airport operator, any contractors, and tenants, their respective obligations under the AC, including the development of Construction Safety Plans.

The AC further notes airport operators are responsible for closely monitoring tenant and construction contractor activity during the construction project to ensure continual compliance with all safety and security requirements. Airports subject to 49 CFR part 1542, Airport Security, must meet standards for access control, movement of ground vehicles, and identification of construction contractor and tenant personnel. Airport operators—or tenants having construction on their leased properties—should use the recommendation in AC 150/5300-9, Predesign, Prebid, and Preconstruction Conferences for Airport Grant Projects, during construction. The airport operator, tenants, and construction contractors should integrate operational safety requirements into their planning and work schedules as early as practical.

For certain airport projects, 14 CFR part 77 requires notification to the FAA. Also, any person proposing any kind of construction or alteration of objects that affect navigable airspace, as defined in 14 CFR part 77 must notify the FAA.

California Public Utilities Code Section 21659 reaffirms the above FAA guidance in stating (a) no person shall construct or alter any structure or permit any natural growth to grow at a height which exceeds the obstruction standards set forth in the regulations of the FAA relating to objects affecting navigable airspace contained in Title 14 of the Code of Federal Regulations, Part 77, Subpart C, unless a permit allowing the construction, alteration, or growth is issued by the department, and (b) the permit is not required if the FAA has determined the construction, alteration, or growth does not constitute a hazard to air navigation or would not create an unsafe condition for air navigation. Subdivision (a), above, does not apply to a pole, pole line, distribution or transmission tower, or tower line or substation of a public utility.

The Draft EIR (Section 4.9, Land Use, on page 4.9-27) notes the proposed Project site is located within both the northern Transitional and Horizontal Surfaces of LPC as designated by FAR Part 77 (see Draft EIR Figure 4.9-5). The Draft EIR further notes the various FAA requirements within those zones (see pages 4.9-27 to 30) and the potential impacts that the proposed Project may have regarding intrusions into airspace.

The Draft EIR identifies mitigation as follows to reduce the impacts that may result:

MM 4.9-1 Prior to the issuance of grading and building permits, the applicant shall:

- Restrict the height of the lighting standards, including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface;

  or

- Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

The applicant and City will comply with requirements of the FAA. That would include submission of any notices.

Response 1-4

The Draft EIR provides a detailed analysis of Noise (see Section 4.10). The Draft EIR determined impacts associated with noise would be less than significant.

Response 1-5

The applicant and City will comply with requirements of the FAA. That would include submission of any notices.

Response 1-6

The California Public Utilities Code section 21688 notes: (a) no payments shall be made from the Aeronautics Account for expenditure on any airport or for the acquisition or development of any airport, if the department determines the height restrictions around the airport are inadequate to provide reasonable assurance the landing and taking off of aircraft at the airport will be conducted without obstruction or will be otherwise free from hazards. Height restrictions shall be considered adequate if at a minimum they meet the obstruction standards of subchapter C of Part 77 of the Federal Aviation Regulations, as those standards apply to civil airport imaginary surfaces related to runways. The airport-owning entity (in this case the City of Lompoc) shall have sufficient control over obstructions in the airspace in the vicinity of the airport to assure height restrictions can be maintained. That control may be in the form of ownership of any land from which obstructions may rise, air navigation easements to guarantee maintenance of restrictions, or height limitation or land use zoning which will prohibit obstructions which would violate the obstruction standards; and (b) that section shall not prevent or prohibit the Caltrans from assisting any public agency or public entity in planning airport development or in planning the zoning needs around an airport.

The City is aware of the requirements of Section 21688. As noted in the Draft EIR (Section 4.9, Land Use, on page 4.9-27 notes the proposed Project site is located within both the northern Transitional and

Horizontal Surfaces of Lompoc Airport as designated by FAR Part 77 (see Draft EIR Figure 4.9-5). The Draft EIR further notes the various FAA requirements within those zones (see pages 4.9-27 to 30) and the potential impacts the proposed Project may have regarding intrusions into airspace. As stated in response to comment 1-6, the Draft EIR provides mitigation to address concerns with height restrictions.

Response 1-7

FAA AC 150/5299-33B provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants. The AC notes most public-use airports have large tracts of open, undeveloped land that provide added margins of safety and noise mitigation. Those areas can also present potential hazards to aviation if they encourage wildlife to enter an airport's approach or departure airspace or air operations area (AOA). The AC notes when considering proposed land uses, airport operators, local planners, and developers must take into account whether the proposed land uses, including new development projects, will increase wildlife hazards. The FAA recommends minimum separation criteria for land-use practices that attract hazardous wildlife to the vicinity of airports.

As stated in the Draft EIR Section 3.0, Project Description, the proposed Project would develop an existing area that consists of an abandoned industrial site that includes dirt roads, former building slabs, debris from prior uses, potentially up to four underground storage tanks (UST's), and vegetation; currently, a small portion of the site is used as a skydiving landing area. Prior uses consisted of a succession of businesses, including sand and gravel operations, an asphalt plant, metal fabrication, a roofing company, scrap metal processing, and contractor yards.

A sand and gravel mine, animal services facility, and household hazardous waste collection/disposal facility are located to the southwest of the proposed Project site. An active quarry and quarry road are located along the Santa Ynez riverbed to the west and north. Immediately south of the proposed Project site is the Lompoc Airport, with the north-side taxiway located approximately 50 feet south of the fenced proposed Project boundary. A narrow section of Federal Bureau of Prisons (BOP) land adjoins the proposed Project site to the north, but has not been developed at this time. The area to the south of the Lompoc Airport and north of West Central Avenue is characterized by a mix of industrial and commercial uses.

The Draft EIR (see Section 4.3, Biological Resources), states the Santa Ynez River provides a wildlife movement corridor for wildlife in the area, as well as riparian habitats that provide cover, nesting and foraging for wildlife species and regional movement. Wildlife movement along the river corridor is generally an east-to-west direction.

The Draft EIR (see pages 4.3-39) evaluates impacts to wildlife movement that would result from the proposed Project. As stated in the Draft EIR, proposed Project development and construction would result in the loss of habitat associated that provides cover and foraging area for migratory species. Off-site, adjacent habitat exists between the proposed Project and the Santa Ynez River and will remain intact, providing an open space buffer and suitable foraging and cover for wildlife moving along the river.

The loss of this habitat will not disrupt the continuous riparian forest extending from the Santa Ynez estuary to the proposed Project site as similar forested habitat is found on the north and south of the river extending to the east and west. In addition, the semi-vegetated river channel provides cover and forage for movement of wildlife. proposed Project construction and operation would not obstruct animal or plant dispersal along the Santa Ynez River as the proposed Project site is not located in the active river channel. Therefore, no direct impacts are expected to affect wildlife movement and connectivity.

Indirect impacts could occur from temporary elevated noise levels and vibration associated with construction equipment and proposed Project operation (drag strip and OHV use). However, proposed Project operations, including noise levels, vibration and lighting, would be sporadic and temporary, and limited to specific proposed Project events.

All lighting for the proposed Project will be shielded and focused downward to illuminate event areas reducing direct light in the direction of open space and the Santa Ynez River. Furthermore, the remaining AWT adjacent to the proposed Project site will provide a buffer for noise and reduce glare from lighting in habitats off-site along the river and similar surrounding habitat, and provide suitable habitat for foraging and cover for wildlife movement.

Finally, given the proposed motorsport park uses, the development of the proposed Project site will not result in an attraction to wildlife. Therefore, impacts due to proposed Project-related activities would be less than significant.

FAA may review development plans, proposed land-use changes, operational changes, or wetland mitigation plans to determine if such changes present potential wildlife hazards to aircraft operations. The FAA considers sensitive airport areas as those that lie under or next to approach or departure airspace. As noted in the AC, the FAA will require notification of the proposed use. The City is coordinating with the FAA and has initiated consultation regarding the proposed Project. Any changes to the ALP will be subject to FAA review and approval.

Response 1-8

Lompoc Airport is under the purview of the Santa Barbara County Airport Land Use Plan (ALUP) which was adopted in 1993 and is the current, primary regulatory measure for the Lompoc Airport. The Santa Barbara County Association of Governments (SBCAG) serve as the Airport Land Use Commission (ALUC). SBCAG, as the ALUC, provided advisory comments for the proposed Project and scope of the environmental review in relation to the adopted 1993 ALUP.

As noted in the Draft EIR Section 4.9, Land Use (see page 4.9-32), SBCAG, acting as the ALUC, has reviewed the proposed Project as part of the Notice of Preparation (NOP) process, and provided comments to the City in its letter of December 22, 2015. At that time, the SBCAG noted, because the proposed Project is only seeking a Conditional Use Permit (CUP), and only requires discretionary permit approval, and it does not involve a General Plan amendment or rezone, a determination of consistency by the ALUC would not be required.

Response 1-9

The proposed Project has been reviewed by the ALUC (see response to comment 1-8). No future expansion plans are under consideration at this time and the ALUC has noted expressed any such concerns.

Response 1-10

The City of Lompoc understands the economic importance of the Lompoc Airport. The City has identified and included goals, policies and implementation measures in its General Plan, Economic Development Element.

The CEQA Guidelines Section 15131 state economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effect on the environment.

The City has decided not to include an economic analysis of the proposed Project in the Draft EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 1-11

The City has posted the Draft EIR on its website and is available at the following link:

http://www.cityoflompoc.com/comdev/Environmental-Open.htm

Response 1-12

Caltrans District 5 has submitted comments on the Draft EIR (see Letter No. 3) from Melissa Streder, Planning and Development Review, dated August 15, 2016. Those comments are addressed in response to comment number 3-1.

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

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

RECEIVED
AUG 15 2016
Planning Division

August 11, 2016
Ms. Lucille Breese, AICP, Planning Manager
City of Lompoc Economic Development—Planning Division
100 Civic Center Plaza
Lompoc, CA 93438-8001
l_breese@ci.lompoc.ca.us

Subject: Lompoc Motorsports Park
Draft Environmental Impact Report (DEIR)
SCH # 2015121005, City of Lompoc, Santa Barbara County

Dear Ms. Breese:

The California Department of Fish and Wildlife (CDFW, Department) received a Notice of Availability of a DEIR from the City of Lompoc for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] CDFW previously submitted comments dated December 24, 2015 in response to the Notice of Preparation for this EIR.

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

CDFW 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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (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 fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that we will need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California 2-1

1 CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required. 2-1

PROJECT DESCRIPTION SUMMARY

The City of Lompoc is the lead agency and owns the land where the Project is proposed. The Project proponent is the Lompoc Valley Parks, Recreation and Pool Foundation, Inc., a 501(c)(3) non-profit California Corporation. A portion of the proposed Project would be funded from a California Off-Highway-Vehicle (OHV) Grant awarded to the City of Lompoc.

The primary objective of the proposed Project is to construct and operate an OHV park, dragstrip, and skydive landing area on 38 acres of city-owned land adjacent to the existing Lompoc airport, within the Santa Ynez River. The 38 acre Project area is on an existing river terrace adjacent to the airport and is just north of George Miller Drive, and west of Highway 1. The proposed Project area lies within the Federal Emergency Management Act's (FEMA) 100 year floodplain (Figure 4.8.2).

Key Project features include, but are not limited to:

- an OHV one-eighth mile oval dirt track
- an OHV seven acre multi-track area including mud bogs and sand drag lanes
- portable night lighting for evening and nighttime OHV activities
- a 2.3 acre low speed trail riding area open to motorcycles, mountain bikes, and all-terrain vehicles (ATV)
- an International Hot Rod Association (IHRA)-sanctioned one-eighth mile drag strip with grandstands and parking for up to 1,250 spectators, and pit areas
- fifteen 55 foot tall fixed light towers to illuminate the dragstrip
- relocation of a skydiving landing strip and addition of a second area
- roadways, parking, and ancillary facilities including fuel storage and use of nitrous oxide
- a "future" pedestrian bridge
- a shallow reservoir using onsite well water for dust control

The proposed Project would result in the complete development of the 38 acre project area. The majority of the site supports various types of riparian vegetation which comprise state wetlands under the jurisdiction of the Department as Responsible Agency. The project area is located on a riverine bench, or terrace, about ten feet in elevation above the bed of the Santa Ynez River. Wildlife resources that would be adversely affected by habitat removal at this location and replacement with the Motorsports Facility would include a wide variety of resident and migratory species. 2-2

The proposed Project site also contains a 7.1 acre area that was previously "set aside" as mitigation to offset the loss of riparian woodlands and scrub communities pursuant to a Department-issued Streambed Alteration Agreement (SAA No. 5-2001-0252) for the City of Lompoc's Runway 7/25 Runway Expansion Project. Replanting at this location was required under the SAA in 2001, and is reported to have failed on two occasions (DEIR 4.3-25); this mitigation obligation therefore has yet to be met. The proposed Project would eliminate this 7.1 2-3

acre "set aside" habitat area, and transfer this existing mitigation obligation to another location that was not mentioned in the DEIR. 2-3

COMMENTS AND RECOMMENDATIONS

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

1602 Jurisdiction

The DEIR describes the Department's jurisdiction under the Fish and Game code section 1602 on Figure 4.3-2. The Department's jurisdiction is shown as corresponding with areas within the proposed Project as arroyo willow thicket (14.5 acres). Other areas mapped as supporting willows are not shown as jurisdictional on Figure 4.3-2. Our review of other preliminary information describing onsite habitats and field visits indicate that the entire 38 acre project area is within the Department's jurisdiction, as it is hydrologically connected to the river and supports various types of vegetation typical of river terraces, and represents a diverse mix of riparian species over most of the 38 acre area. Some of this area includes the 7.1 acres set aside in 2001 to mitigate for riparian impacts from the runway expansion project and this mitigation area is also within our jurisdiction. Other proposed Project components requiring Department authorization under an SAA include the proposed onsite shallow well, onsite reservoir, and the subsurface geophysical survey relative to up to four underground storage tanks that may contain hazards. 2-4

The Department will make a final determination of our 1602 jurisdiction should the Project be approved and we receive notification for a SAA.

Onsite Habitats and Setting

The DEIR provides inconsistent descriptions of the proposed Project area. For example, the Project overview indicates that the Santa Ynez River is north of the 38 acre Project area (DEIR 2.0-1). In fact, the proposed Project area is located on a riverine terrace within the Santa Ynez River itself, is fully located within the FEMA 100 year floodplain, and the majority of the site supports riparian vegetation of critical importance to the functions and values of the Santa Ynez River. This needs to be clearly stated in the DEIR Project overview. 2-5

The DEIR Project overview goes on to describe the 38 acre Project site as currently undeveloped and consisting of dirt roads, former building slabs, debris from prior uses, vegetation, and potentially up to four underground storage tanks (DEIR 2.0-1). This section needs to identify that the site contains a 7.1 acre mitigation area that is permanently set aside and was to include riparian restoration under a previous Department-issued SAA. The DEIR project overview also needs to identify that the vegetation described is largely riparian native habitats and represents state wetland resources, and is within the regulatory jurisdiction of the Department as Responsible Agency. 2-6

The vascular plants species list is based upon the single January 8, 2016 field assessment. This list does not include key riparian species the Department has observed in the Project area from past and recent visits such as black cottonwood (*Populus trichocarpa*), box elder (*Acer negundo*), valley oaks (*Quercus lobata*), and elderberry (*Sambucus nigra*). 2-7

Recommendation: An updated and accurate alliance and association-based vegetation map and assessment needs to be included with ground truthing to verify field conditions. This information should be included in a recirculated DEIR so that the Department can more readily evaluate Project impacts and recommend feasible mitigation measures. 2-7

Special Status Species

The Biological Baseline Assessment conducted for the proposed Project and "surroundings" is described as a reconnaissance-level survey conducted on January 8, 2016 (DEIR 4.3-2). The survey was predictive in nature and focused on the potential for special status plants and animals to occur in the onsite habitats. Actual surveys for special status plants and animals do not appear to have been conducted. Several mitigation measures defer project biological assessments until after completing the CEQA process despite the fact that this information is required now to identify environmental baseline, and needs to be included in the CEQA analysis. The Department provided specific direction in our comments on the Notice of Preparation for this project, aimed at identifying the types of specific plant and animal baseline information we require as Responsible and Trustee agencies. That information has not been provided.

The DEIR therefore relies upon a single-day reconnaissance-level biological evaluation to form the basis for identifying significant impacts to biological resources in this portion of the Santa Ynez River. The lack of adequate baseline special status plant and animal survey information suggests there is potential for significant adverse impacts to undetected special status species of plants and animals. 2-8

The DEIR does not disclose survey limitations resulting from the brief onsite winter reconnaissance. Many species of wildlife are not active or identifiable in winter months, bird nesting has not been initiated, many common and sensitive plants are not flowering and identifiable in winter, and most annual plants are too small to accurately identify, assuming they have germinated. These types of limitations should be discussed in the DEIR. Since thorough surveys have largely not been conducted, the Department does not agree with the findings that impacts to special status biological resources would be less than significant.

Recommendation: The Department requests that appropriate site-specific field surveys be conducted for special status plant and animal species, consistent with the Department's various survey protocols as described in our original scoping comments dated December 24, 2015, and included here by reference. Once field assessments have been completed, we recommend that the DEIR be recirculated so that the public and other agencies can review the outcome and evaluate Project alternatives and mitigation strategies for special status plant and animal species.

Southern Steelhead

The Santa Ynez River supports one of the most important extant populations of southern steelhead (*Oncorhynchus mykiss*; federally endangered). The DEIR concludes that the Project would have no direct or indirect effects on steelhead or its habitat (DEIR 4.3-35), and indicates there is no aquatic habitat at the Project site. 2-9

The Department was unable to locate any specific quantified information regarding the frequency at which varying flood flow events would be expected to inundate all or part of the proposed Project. The Central Coast Regional Water Quality Control Board, another CEQA Responsible Agency, specifically requested this information in their comments on the Notice of Preparation dated December 28, 2015. The Department requested similar information in our scoping comments dated December 24, 2015, including the need for specific information on Project-related changes in drainage patterns, changes in volume, velocity and frequency of existing and post-Project surface flows. This information has not been provided.

The Department therefore is unable to determine the potential adverse impacts to steelhead should the proposed Project be constructed at this location and we again request the information be provided. Absent this information, we would conclude that the record does not demonstrate that there would be no direct or indirect impacts to federally endangered steelhead and its habitat. During and immediately after higher flow events, this facility may be inundated and this is likely to lead to direct impacts to migrating steelhead and degradation of water quality. Water quality may also be degraded outside storm events as ground water is located beneath the proposed Project site where hazardous substances would be used (see Water Quality section, below). These potential impacts are unacceptable to the Department as Responsible Agency for the Santa Ynez River. 2-9

Recommendation: The Department recommends alternative sites outside the Santa Ynez River be further investigated in order to reduce the potential for significant adverse impacts to southern steelhead. Additional hydrologic information and modelling is necessary to quantify hydrologic impacts as they pertain to building this type of facility in the floodway and demonstrating that adverse impacts to steelhead and their habitat have been avoided.

Wildlife Movement Corridor

The proposed Project would eliminate a 38 acre riverine terrace supporting riparian habitat on the Santa Ynez River in order to construct and operate a motorsports facility within the floodway. This habitat area is part of the east-west linear migration corridor which sustains resident and migratory wildlife populations along the Santa Ynez River. The proposed Project would occupy most of the riverine terrace and existing riparian habitat area. The motorsports facility would be about 4500 feet long and is about 550 feet wide at the maximum width. This means the proposed Project would remove around 8/10ths of a mile of linear movement corridor along the north bank of the Santa Ynez River.

A remaining riparian habitat band would be left just north of the proposed facility. The acreage of this remnant strip is not provided in the DEIR. It is about 200 feet wide at the widest along the central portion of the proposed Project area, and then would transition westward to a narrow area only about 50-75 feet wide and abutting a quarry road leading to mined areas on the floor of the river further to the north. 2-10

The DEIR asserts that the proposed Project would not obstruct animal or plant dispersal because the Project site does not include the river (DEIR 4.3-39). This statement is not supported by the existing conditions at the Project site as observed by the Department. The DEIR indicates that offsite, adjacent habitat exists between the proposed Project and the Santa Ynez River and will remain intact, providing an open space buffer and suitable foraging and cover for wildlife moving along the river. The Department does not agree. The remaining

linear riparian habitat fragment would be exposed to considerable adverse edge effects from incompatible land use activities should the proposed Project be constructed, including fugitive dust, high noise levels, night lighting, and a high levels of human presence. The remnant habitat area is therefore unlikely to provide suitable long term foraging and cover for resident and migratory wildlife, and is not a substitute for the functions and values found on the existing larger riparian terrace.

The DEIR also asserts that since there is similar habitat elsewhere in the Santa Ynez River, the proposed Project would not disrupt continuous riparian forests and would not obstruct plant and animal dispersal, leading to the conclusion that no direct impacts are expected to wildlife movement and connectivity. This statement is not correct in the Department's opinion, as we would lose over 90% of the onsite riparian terrace occupying the banks of the Santa Ynez River. Wildlife moving along the south bank of the river would be confined between exposed quarried areas, cleared quarry roadways, and a narrow band of riparian vegetation less than 75 feet wide and vulnerable to losses during future flood events. The Department finds that the Project would, in fact, substantially interfere with wildlife movement and connectivity, leading to significant adverse impacts under CEQA threshold 4.3-4 in the DEIR.

The DEIR acknowledges that some indirect effects could occur from noise, vibrations, and Project operations, but that would be sporadic and temporary. The DEIR asserts that the remnant riparian vegetation north of the proposed Project would serve to buffer noise and reduce glare. This area lacks core habitat distant from adverse edge effects originating from the proposed Project area and therefore, this riparian habitat is being impacted by indirect effects, which suggests more wildlife loss at this location just outside the proposed Project and the need for additional compensatory mitigation. The narrow, remnant riparian habitat area could experience flood impacts and could be removed in high flow events, leaving no riparian habitat at all within this location. 2-10

The DEIR does not describe different flood recurrence intervals affecting the proposed Project area, other than it lies within the mapped FEMA 100 year floodplain. Therefore, the Department is unable to determine how the proposed Project would interface with flood events and how this would affect the remnant riparian strip and nearby habitats.

Development of the riparian terrace under the proposed Project would also eliminate riverine terrace habitat that serves as refugia during flood events. Wildlife must be able to move out of flooded areas when high water flows occur, and adjoining terraces provide escape habitat for a variety of species when floods occur. The proposed Project would eliminate flood refugia habitat and replace it with a developed facility.

Chain link fencing is described as surrounding the proposed facility. Fencing could capture debris in floods, impair flood flows, interrupt wildlife movement during flood events, or cause direct wildlife mortality via impingement on fencing or other obstacles.

The DEIR discusses wildlife movement and connectivity issues generally, and concludes that there will be no significant impacts to wildlife movement from the proposed Project. The DEIR describes that wildlife movement is provided north of the proposed Project site, inferring movement does not occur within the riparian terrace and habitats at the proposed Project site (DEIR 4.3-24). The Department disagrees with these statements. The Department observed a wealth of evidence of wildlife use and activity in the proposed Project area when we conducted

a recent site visit on July 26, 2016. The Santa Ynez River, including the Project area, provides a critical wildlife corridor for ungulates, carnivores, raptors, passerines birds, rodents, and reptiles. California red harvester ants (*Pogonomyrmex californicus*) were observed in abundance in the Project area, and are a declining keystone species that is the main food source of the coast horned lizard (*Phrynosoma blainvillii*), coastal whiptails (*Aspidocelis tigris mundo*), and other declining reptiles. Evidence onsite indicates the presence of mule deer (*Odocoileus hemionus*) adults and juveniles and they may be potentially fawning in this area. 2-10

Recommendations: In order to maintain east-west migration and resident wildlife, the Department recommends that the proposed Project not be approved at this location and that other offsite alternatives be investigated which would not place this type of incompatible land use within the Santa Ynez River and its floodway. Mitigation in other geographic areas of the river would not compensate for the substantial interference of wildlife movement this project would cause if constructed at this location, and would not replace the 7.1 acres of runway mitigation already required to be set aside at this location. The proposed Project will have a significant adverse impact to wildlife movement and this impact is Class I in the Department's view.

Offsite Habitat Mitigation

The proposed Project would impact a 38 acre riparian terrace and the DEIR describes removing arroyo willow thicket, coyote brush scrub, willow windrows and willow trees, and a 7.1 acre area set aside under a previous Department-issued SAA (DEIR 4.3-4). DEIR Mitigation Measure 4.3-1 would require off-site mitigation at a 5:1 ratio for a total of 72. 5 acres for the 14.5 acre impact to arroyo willow thicket. Off-site mitigation for other habitat types is not proposed.

Mitigation Measure 4.3-1 does not clearly describe the proposed mitigation measure. The 5:1 ratio appears to be based upon acreage. Specific language conflicts as to whether existing habitats are to be preserved, new habitat created, or some combination of both.

The State of California's no-net-loss of wetlands policy indicates that the Department must address the net loss of wetlands under the proposed Project as Responsible Agency. This would require that at least 38 acres of new riparian habitat be successfully created, permanently protected and managed, at a 1:1 ratio. 2-11

Creation of new riparian habitats to compensate for impacts to established riparian habitats is currently problematic given recent drought, extreme temperature events, lack of irrigation water, and other factors challenging to establishing new riparian and phreatophytic vegetation. The Department is aware of several streambed restoration projects failing to meet success criteria exacerbated by drought conditions. We note that the City of Lompoc has described the runway expansion mitigation located in the proposed Project area as having failed to establish on two occasions (DEIR 3.0-21). It appears that the technical feasibility of replacing existing deeply-rooted riparian species with new created habitats is not assured, and therefore, we cannot rely upon these types of mitigation efforts as CEQA requires, unless the measures can be shown to be successful prior to Project impacts.

The remaining 4:1 mitigation should focus on permanent protection of existing unprotected habitats and long-term management of existing, compensatory habitat of equal or greater value. It will also be necessary to restrict incompatible activities such as off road vehicle use within

areas serving as mitigation. This can be very difficult without active patrolling and effective enforcement. The DEIR does not provide any information describing potential areas that could be acquired to serve as Project mitigation, and therefore, the feasibility of both habitat creation and permanent habitat protection and management cannot be determined from the information provided in the DEIR.

Recommendation: The Department recommends the following modifications to proposed Mitigation Measure 4.3-1:

- Off-site habitat creation at 1:1 should be accomplished prior to initiating (grubbing, grading, constructing) the proposed Project. This means the vegetation and habitat should demonstrate it has established and will survive and replace the functions being lost before Project impacts to habitat can be authorized by the Department and City of Lompoc as Lead Agency.
- Compensatory habitat at 4:1 should also be secured and permanently protected, in combination with securing the habitat creation component above, prior to initiating the proposed Project.
- A revised DEIR needs to be recirculated to include specific information regarding locations for 1:1 habitat creation, and 4:1 compensatory habitat preservation, so that the feasibility of obtaining these areas can be determined, and the actions to protect the mitigation resources from off highway vehicles and other adverse impacts can be addressed.
- Permanent Conservation Easements, acceptable to the Department as Responsible Agency, shall be recorded on all areas serving as mitigation under the SAA. State wetland policy notes that permanent protection in perpetuity is needed where projects permanently remove wetlands, which is the case here. The DEIR record indicates that a "set aside" area is viewed as not permanently protected by the City of Lompoc, further supporting the need for binding legal agreements which actually achieve permanent protection on the ground.

2-11

Runway 7.1 acre mitigation

The DEIR describes a previous runway expansion project which resulted in mitigation obligations under a Department-issued SAA. This 2001 agreement required that 7.1 acres of riparian habitats be "set aside" to offset permanent impacts to riparian habitats from runway expansion, combined with additional replanting within the 7.1 acre area. It would appear from discussion in the DEIR that the replanting failed on two occasions. No reasons for this failure are given, other than "the plants died" (DEIR 3.0-21). DEIR Mitigation Measure 4.3-7 proposes to relocate this existing mitigation requirement offsite. No specific locations are identified in the DEIR and therefore, the feasibility of completing this mitigation cannot be evaluated with the information provided. The City of Lompoc Airport is still responsible for completing this mitigation. Removal of a previously established mitigation area(s) serving to offset project impacts under a Department-issued SAA is a concern to the Department and could require additional compensatory mitigation. The Department also typically requires additional mitigation for temporal losses and in this case, 15 years has passed without successful completion of the habitat creation component of the SAA mitigation requirements. This contributes to a significant cumulative, adverse effect to riparian habitats and riparian-dependent species along the Santa Ynez River.

2-12

Recommendation: The proposed Project should select an offsite alternative project location which would not build over the SAA-required mitigation area. Since the enhancement plantings

have not successfully established and weed management has not been undertaken or was unsuccessful, the onsite mitigation area needs to be expanded to include additional acreage to serve as mitigation for the original impacts in 2001 and temporal loss over the last 15 years. Specific offsite locations that could serve as permanent mitigation need to be identified so the feasibility of this mitigation approach can be evaluated. Protection of the mitigation area with a Department-approved permanent conservation easement also needs to be included in the mitigation requirements. 2-12

Impacts to Trees

The DEIR does not specifically identify impacts to existing trees within the riparian area where the proposed project would occur. The DEIR proposes a 5:1 habitat-based mitigation approach. Where riparian tree species would be impacted or removed, the Department typically also requires specific replanting ratios for various native riparian trees. Since trees require considerable time to mature and develop replacement resources, a typical 5 year restoration project, as proposed in this DEIR, would not ensure that impacts to established trees have been mitigated to less–than-significant levels.

The DEIR for the proposed Project provides a brief narrative description of plant species observed in key habitat types, and a species list from observations on a single day in January 2016. From this limited information, numerous tree species likely occur onsite, including but not limited to: red willow (*Salix laevigata*), cottonwood (*Populus trichocarpa* and/or *fremontii*), sycamore (*Platanus racemosus*), coast live oak (*Quercus agrifolia*), box elder (*Acer negundo*), and elderberry (*Sambucus nigra caerulea*). 2-13

Recommendation: The Department as Responsible Agency requires more specific counts and maps for tree species and their general size and condition, in order to determine appropriate compensatory mitigation for loss of riparian trees. It is likely that replanting at a ratio of 10: 1 is necessary where individual trees cannot be avoided. Offsite locations suitable for replacement tree plantings that directly benefit wildlife species need to be identified in the DEIR, and permanent protection of offsite mitigation is also necessary. A longer monitoring period of at least ten years is needed to demonstrate that replacement trees have established.

Water Quality

The DEIR identifies that numerous hazardous substances would potentially be present at the proposed facility. Hazardous materials would be utilized during on-site events, such as fuels, lubricants, degreasers, solvents, hydraulic fluids, and cleaning compounds. Racing events require large quantities of gasoline, oil, and other fuels, therefore increasing the chance for accidents to occur, such as spills or explosions. Storage of fuels (gasoline, diesel, and alcohol fuels) and nitrous oxide gas on the proposed. Project site would be expected to be in limited quantities and allowed only in approved containers by event participants. On-site equipment would be fueled via truck-mounted tanks and no racing fuels would be allowed on site when the facility is not in use (DEIR 4.7-18). The Department assumes that porta-potty facilities would also contain chemicals that could spill or leak at the site. Public events will also generate large amounts of trash, food waste, garbage and debris. Trash could create wildlife nuisance issues. 2-14

The DEIR finds that the proposed Project would include risks for hazardous spills such as fuels on-site but concludes that runoff from a potential spill would not flow into the river because of the proposed Project's storm water capture design. The DEIR states the design allows surface water runoff to be directed into two infiltration basins extending on either side of the dragstrip and return road. All surface water runoff would be captured in those two areas with no runoff draining into the Santa Ynez River. Therefore, the DEIR asserts that impacts related to the release of hazardous materials into the environment would be less than significant (DEIR 4.7-19).

Recommendations: The DEIR should disclose that at least 1200 privately owned automobiles and OHVs may leak gasoline, oil and other chemicals when operating at the site. The DEIR needs to identify how hazardous chemical substances that have spilled or leaked within the project area will be captured and prevented from entering infiltration basins or would be prevented from otherwise soaking into the alluvial terrace and reaching the below-ground water table. The water table is described as about 29 feet below ground surface in the Project area. This water table is affiliated with the Santa Ynez River and is contiguous and interconnected. The DEIR fails to acknowledge that the shallow groundwater in this area interacts with the water table that sustains the river and the riparian habitats at the proposed Project site. 2-14

The DEIR assertion that hazardous substances would not flow "into the river" is not correct in the Department's view. Since the proposed Project would be constructed in a flood plain, the potential exists for floodwaters to mobilize pollutants and convey them directly into the river or groundwater. The DEIR also does not discuss what would occur should high flow runoff events in the Santa Ynez River overtop the facility and mobilize pollutants and debris.

Recommendation: The Department finds that there is potential for significant adverse effects to water quality from hazardous chemical use at the proposed Project, and the proposed mitigation does not reduce impacts to less-than-significant levels. The Santa Ynez River terrace location and its riparian habitats is an inappropriate location for this type of project which relies upon ongoing use of hazardous chemicals proximate to local water tables and fish and wildlife beneficial uses.

The City of Lompoc via the DEIR should identify who would be the direct responsible party(s) should hazardous fluids, substances or debris leak, spill, or wash out of the facility and how such leaks would be detected, monitored, and cleaned up. The only responsible parties mentioned in the DEIR are "event participants" handling approved containers. Approved containers can leak or spill. The proposed Project requires a responsible facilities management entity in the Department's opinion and could generate considerable liabilities if water quality regulations are violated.

Grading and Groundwater Recharge

The existing, relatively intact riparian terrace with its established riparian vegetation and sandy loam soils would be expected to provide good infiltration during rainfall events, which benefits on-site and surrounding riparian habitats and sustains groundwater resources for both human and wildlife benefits uses in the regional area. However, the proposed Project would result in substantial adverse impacts to rainfall infiltration from vegetation clearing, grading, soil compaction, and creation of impervious surfaces. The roadways and dragstrip areas, for instance, would be compacted to 95% (Figure 3.0-8). Compaction reduces pore spaces within 2-15

soil profiles, and lowers its ability to absorb and infiltrate rainfall, exacerbating runoff and impairing ground water recharge. OHV areas would not be paved, and some areas would not be graded, but the resulting changes in land use will result in soil compaction on all surfaces used for raceways and vehicular recreation and this should be disclosed in the DEIR.

The DEIR indicates that the site would be improved for human use with the addition of 233,000 square feet of impervious surfaces (DEIR 2.0-39; cement on the dragway and related features). The DEIR concludes that the proposed Project would not interfere substantially with groundwater recharge and indicates it would not impede the percolation of groundwater and would provide for surface water to be collected at two proposed infiltration areas. The two infiltration basins combined occupy less than two acres, while the remaining 36 acres would no longer infiltrate. This represents a substantial reduction in infiltration compared with existing conditions, and this impact is not adequately addressed in the DEIR. The two basins are also located on the far west, downstream end of the existing riparian terrace, so the limited infiltration services these two basins would provide will not benefit the remnant riparian strip located upstream and along the northern length of the proposed Project. 2-15

Recommendation: The DEIR needs to disclose that the majority of the 38 acre area would experience compaction during grading, construction, or operation of the facility, and the impervious features described will combine and serve to prevent or substantially reduce infiltration which may constitute a significant impact under Threshold 4.8-2 in the Department's opinion, and particularly so when we consider the cumulative effects of other projects creating impervious conditions in the local and regional area.

Indirect Effects

The DEIR identifies the potential for adverse impacts to occur from noise, dust, lighting, and other Project-related changes that disrupt wildlife activity and displace wildlife species intolerant of changed habitat conditions. These impacts will spread beyond the immediate facility, affecting habitat and species outside the project area and constituting significant adverse impacts to wildlife. These impacts are not quantified and no mitigation to offset indirect impacts to habitats outside the proposed Project is proposed. 2-16

Noise- The proposed Project would produce high levels of noise as analyzed in the DEIR. The DEIR has not analyzed the effects of new sources of noise and vibration on resident and migratory wildlife, including areas surrounding the proposed Project. Figures 4.10-8, 9, 10 shows noise decibels (in dB(A) –(A) meaning- adjusted for human hearing) extending outward from the proposed Project into the surrounding river and adjacent riparian habitats utilized by dependent resident and migratory wildlife. The noise analysis in DEIR does not quantify the impacts of noise and vibrations on wildlife species and does not treat wildlife as a sensitive receptor. 2-17

A growing body of literature indicates that noise is an intense, widespread pollutant adversely affecting wildlife in a variety of ways. There are many hidden costs of noise exposure in wildlife, including compromising predator/prey detection, mating signals, altering temporal and/or movement patterns, and increasing physiological stress (Francis and Barbor 2013). Noise impacts on terrestrial animals can take many forms, including changing habitat use and activity patterns, increasing stress response, decreasing immune response, reducing reproductive success, increasing predation risk, degrading conspecific communication, and damaging

hearing if the sound is sufficiently loud (Pater et al. 2009). Chronic and frequent noise interferes with animals' abilities to detect important sounds, whereas intermittent and unpredictable noise is often perceived as a threat (Kight and Swaddle 2011). Most importantly, these effects can lead to fitness costs, directly or indirectly affecting survival and reproductive success (Francis and Barbor 2013).

The sound scale used in the DEIR shows a logarithmic increase in noise with each 10 dB increase in noise (Figure 4.10-1). This means that 60 dB is ten times louder than 50 dB. Wildlife vary in the sound frequencies they are capable of hearing, they hear differing sound frequencies than humans, and their responses also vary and do not equate to human hearing (FHWA 2011). For example, the following ranges have been reported by FWHA (2011) for various categories of wildlife:

- Mammals: 10 Hz to 150 kHz; sensitivity to -20 dB
- Birds: 100 Hz to 8-10 kHz; sensitivity at 0-10 dB
- Reptiles: 50 Hz to 2 kHz; sensitivity at 40-50 dB
- Amphibians: 100 Hz to 2 kHz; sensitivity from 10-60 dB

The Department therefore finds that the proposed Project, if constructed and operated, is likely to generate high levels of noise far above current conditions at or near the riparian habitats located in the project vicinity. Loud to very loud noises are highly likely to be generated by OHV and drag racing activities, and these will fall within the range of decibels demonstrated to cause adverse effects to wildlife.

2-17

The DEIR concludes that overall, the noise generated by the proposed Drag Strip and OHV Trail Ride Area would be similar to existing conditions, with exterior noise levels *ranging from* 50.0 dB(A) to 72.9 dB(A) (DEIR4.10-36), and concludes that impacts would be less than significant. We note that the values depicted on various figures range from 76-92 dB(A) at the facility, and those values are both higher and inconsistent with the 50- 72.0 dB(A) cited elsewhere in the document. Figures 4.10-8, 9, and 10 show far higher noise levels radiating from the point source (the proposed Project site) outward in all directions and including riparian habitats to the north across the low flow channel of the Santa Ynez River.

The Department finds that the existing 38 acre project area currently supports riparian habitats and is quiet except for occasional activity at the adjacent airport. It should be noted that existing sound baseline was established without placing any monitoring stations in the proposed Project area in wildlife habitats. Figure 4.10-4 shows the closest monitoring station was placed on Highway One at a busy intersection and is not typical of conditions at the Project site which extends away from this noise source. This quiet condition will change to a facility generating up to 92 dB(A), and capable of causing hearing damage in humans (DEIR 4.10-1). This means the proposed Project is likely to cause significant adverse impacts to wildlife, and this is not adequately addressed in the Noise analysis section of the DEIR.

The DEIR concludes that indirect impacts to wildlife could occur from temporary elevated noise levels and vibration associated with construction equipment and proposed Project operation. However, proposed Project operations, including noise levels, vibration and lighting, would be sporadic and temporary, and limited to specific proposed Project events (DEIR 2.0-24). Sporadic and temporary loud noises can cause significant impacts to onsite and nearby wildlife

and the Department finds this is a potentially significant adverse impact to onsite and adjacent wildlife.

The DEIR suggests that wildlife unable to habituate to noise and other indirect effects from the proposed Project would leave the area, concluding that there would be no significant impacts. The DEIR is in fact describing that wildlife will be displaced from areas beyond the proposed Project site, resulting in more adverse impacts to the Santa Ynez River wildlife corridor and its habitat and beneficial uses.

2-17

Recommendation: The Lead Agency should re-evaluate specific noise impacts to wildlife species expected to occur within and adjacent to the project area. Data should not be weighted based upon human hearing when analyzing potential effects on wildlife. Based upon figures showing sound levels in the general area (Figures 4.10-8, 9, and 10), riverine habitats north of the proposed Project and including the main riparian habitat on the opposite bank will experience high levels of noise from the point source at the facility, should it be constructed. Feasible mitigation to avoid this impact at the Santa Ynez River migration corridor may not be possible in the Department's view, suggesting that other Project site alternatives should be evaluated.

Dust- The Department is particularly concerned about chronic fugitive dust emanating from the OHV facility, which would largely not be paved or covered in impervious surfaces. Fugitive dust can cause any number of adverse impacts to vegetation, pollinators, fish, and wildlife generally. The DEIR proposes to address fugitive dust by installing an on-site well to obtain groundwater to use to wet the area to keep down dust. The DEIR assumes this will be effective.

Measures as described in the DEIR would include that all ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent (Mitigation Measure 4.2-1). This suggests 16% of the dust would not be controlled and some unknown "amended" substance would be added to water onsite. The efficacy of amendments, and their chemical content, needs to be disclosed in the DEIR. Specific information is needed regarding the anticipated effectiveness of dust control on this type of facility which would be expected to experience continued surface disturbance by participants and visitors during events and is located in an area which experiences considerable wind. The DEIR also indicates the motorsports park operator will apply water to the surface of the open riding and trail ride area with a control efficiency of 50 percent during operation (DEIR 4.2-22); this appears to conflict with the 84% target for Mitigation Measure 4.2-1, and suggests poor dust control at that level.

2-18

The Department notes that using groundwater from an onsite shallow well could deplete the nearby water table that is sustaining riparian resources, while the dust control is likely to be ineffective. When the site is not operating, fugitive dust would be generated by winds off the disturbed surfaces. Following events, the surfaces will be re-disturbed, freeing new fines to emerge as fugitive dust when winds pick up again, regardless of watering or speed limits. The Department has observed difficulties keeping down dust at project sites despite watering or use of amendments.

The DEIR needs to identify other sources of water to use in controlling dust that do not source from riparian areas or riparian groundwater supplies. Given the lack of water in the Lompoc

Valley, generally, the Department does not agree that this water use from a riparian area is appropriate.

The proposed Project also would install an onsite shallow well which would maintain an onsite reservoir; this groundwater would be used for dust control. The DEIR indicates the reservoir would hold 5000 unidentified units of water, so this could be gallons, or acre feet, and the units need to be identified correctly for impact assessment purposes. Both this well and the reservoir feature would also be subject to authorization by the Department under Fish and Game Code section 1602.

2-18

Recommendation: The DEIR needs to evaluate how groundwater pumping would affect the remaining onsite riparian resources and how current drought may affect the ability of this Project to sustain pumping levels. Given that the water table is described as 29 feet below ground surface, a 100 foot deep shallow well would be taking water utilized by existing riparian resources and could create a cone of depletion surrounding the area, with a local drop in the water table, further depriving habitats in the immediate area of water necessary to sustain plants and wildlife. Should the local water table be depleted by well pumping, localized subsidence could occur, permanently reducing ground water storage in the immediate area. The DEIR needs to evaluate these potential impacts.

If the reservoir feature includes an open water component, it would need to be designed and maintained free of non-native invasive aquatic organisms such as bullfrog and crayfish. The Department may be unable to authorize construction of open water reservoirs or ponds at this location, as they could become a hazard or sink for protected amphibian species.

Alternatives

The DEIR identifies a number of alternative sites that were initially considered but rejected as infeasible (DEIR 5.0-2). The Department notes that Figure 5.0-1 incorrectly shows an Alternative Site A- as depicted, the mapped area is sovereign state land and part of the Burton Mesa Ecological Reserve, managed by the Department.

The remaining off site alternatives are all shown as being located either within the banks of the Santa Ynez River, or adjacent to riparian terraces that flank the river corridor and would have similar unacceptable impacts to riparian-dependent resources. It might be feasible to mitigate the biological impacts of a similar project located on agricultural lands outside the floodway, such as locations C and F, but these were also rejected in the DEIR as infeasible.

2-19

A number of Project objectives conflict with previous commitments to set aside habitat at the project area for the runway expansion and force analysis of the project to this single location, limiting consideration of feasible offsite alternatives including alternative locations outside the city limits.

The DEIR identifies nine basic Project objectives (DEIR 5.0-8). A key objective includes the opportunity to implement mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project, including the restoration of approximately 7.1 acres of riparian vegetation. The Department notes that the City of Lompoc airport is currently obligated to successfully complete the permanent protection and restoration under an existing SAA which includes CEQA compliance. This requirement exists independently of the proposed Project.

Another objective is to redevelop underutilized lands that are in need of remediation and restoration along the Santa Ynez River (DEIR 5.0-8). The Department fails to see how the proposed Project would restore habitat along the Santa Ynez River when it would directly eliminate up to 38 acres of existing, functioning riparian habitats. The DEIR describes failed riparian restoration efforts in the past at this same location, and that preceded current drought conditions. The Department does not consider waters of the state and riparian resources as "underutilized", and we are concerned there is great risk in removing existing established riparian areas and relying up new habitats to be created elsewhere. 2-19

The Department specifically requested in our comments on the Notice of Preparation for this project that a range of feasible alternatives for the location and design features be evaluated and alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. We find that the DEIR has not provided an adequate evaluation of off-site alternatives that would be protective of the Santa Ynez River and its irreplaceable beneficial uses.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: 2-20
http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf.
The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, 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. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 2-21

CONCLUSION

Due to the issues presented in this letter, CDFW concludes that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts on biological resources. As a Responsible Agency, CDFW may consider the option provided in CEQA Guidelines section 15042. In addition, because of these issues, it is unlikely that the City of Lompoc, as Lead Agency, has the basis to approve the project or make "findings" as required by CEQA unless the environmental document is modified to eliminate and/or mitigate significant impacts, as reasonably feasible (CEQA Guidelines, §§ 15074, 15091 & 15092), notwithstanding a statement of overriding considerations. 2-22

Questions regarding this letter or further coordination should be directed to Mary Meyer, Senior Environmental Scientist (Specialist) at (805)640-8019 or mary.meyer@wildlife.ca.gov.

Sincerely,

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References

Federal Highway Administration (FWHA), 2011. Noise Effect on Wildlife. Online reference: https://www.fhwa.dot.gov/environment/noise/noise_effect_on_wildlife/effects/wild04.cfm

Francis, Clinton D. and Jesse R. Barbor, 2013. A Framework for Understanding Noise Impacts on Wildlife: An Urgent Conservation Priority. Front Ecol Environ 2013; 11(6): 305–313.

Kight, Caitlin R. and J. P. Swaddle, 2011. How and Why Environmental Noise Impacts Animals: An Integrative, Mechanistic Review. Ecology Letters. Review and Synthesis. 13 pp.

http://jpswad.people.wm.edu/Kight%20and%20Swaddle%202011%20ELE%20proofs.pdf
Pater, Larry L., Teryl G. Grubb, and David K. Delaney. 2009. Recommendations for Approved Assessments of Noise Impacts on Wildlife. Journal of Wildlife Management 73(5):788–795.

Letter No. 2: Edmund Pert, Regional Manager, South Coast Region, State of California Department of Fish and Wildlife, August 15, 2016

Response 2-1

The comment is noted. Section 4.3, Biological Resources of the Draft EIR addresses the California Endangered Species Act, Code 2050 regarding "take," and provides mitigation measures to address potential impacts to sensitive status species. Refer to Topical Response 2, Biological Resources.

Response 2-2

See Response 2-1. Additionally, pages 4.3-38 and 4.3-39 of the Biological Resources section of the Draft EIR addresses potential impacts to riparian habitat and migratory species.

Response 2-3

Approximately 7.1 acres of land on the proposed Project site has been previously designated for the replanting of vegetation and mitigation project from the Lompoc Airport Runway Expansion. That mitigation effort was established pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW).

The Draft EIR provides a discussion of the mitigation site required as part of the Runway Extension Project in both Section 4.3 Biological Resources, and Section 4.9, Land Use.

Please refer to Topical Response 6, Mitigation Area, regarding the mitigation area. As discussed in Section 4.9 of the Draft EIR, implementation of the proposed Project would preclude the City from again implementing the required in the identified 7.1-acre mitigation area, and could, therefore, result in a significant impact.

If that replanting requirement is still applicable, the the Draft EIR identifies the following mitigation measure to reduce that impact:

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

Response 2-4

As noted in the Draft EIR (see page 4.3-31), any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW.

Additionally, refer to Response 2-1.

Response 2-5

Text of the Final EIR has been revised to clarify the proposed Project site and proximity to Santa Ynez River. Please refer to **Section 3.0 Revisions to the Draft EIR** of the Final EIR for that revision.

Please refer to Topical Response 3, Hydrology, and Section 4.8, Hydrology and Water Quality, of the Draft EIR, which address the FEMA 100-year floodplain, and states the following: "The Federal Emergency Management Agency (FEMA) defines a floodplain as the area of land adjacent to the water course that may be submerged by flood water during a 100-year storm. The City's designated floodplain areas are located on **Figure 4.8-1, FEMA-Designated Floodplain Areas.** The proposed Project site is currently located within FEMA's 100-year floodplain area.

Additionally, refer to Topical Response 2, Biological Resources—Floral/Faunal Species, which further states the majority of the proposed Project site supports various types of riparian vegetation that comprise state wetlands under the jurisdiction of the CDFW.

Response 2-6

Section 2.0, Summary, of the Draft EIR does address the 7.1-acre mitigation area. As noted in the Draft EIR (see page 4.3-31), any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW.

Section 4.3, Biological Resources of the Draft EIR, includes the following mitigation measure which addresses the 7.1-acre site and CDFW jurisdiction if that mitigation is still required:

4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

Further, as discussed in Section 4.3 in the Draft EIR, Mitigation Measure 4.3-1 would off-set impacts to on site arroyo willow thicket (14.5 acres), which includes trees, and off-site mitigation would be implemented at a 5 to 1 ratio for a total of 72.5 acres. As discussed, implementation of Mitigation

Measure 4.9-7 would reduce impacts to the loss of the mitigation area to less than significant. In addition, please refer to Response 2-5 and Topical Response 6 regarding the off-site mitigation area.

Response 2-7

A reconnaissance-level survey of the proposed Project site and surroundings was conducted by biologists. The objective of the field survey was to determine the likelihood of occurrence of any special-status plant or wildlife species based on the presence/absence of suitable habitat and other natural history elements that might predict their occurrence. Based on a review of the species likely to occur on site, no surveys for bats, owls or other nocturnal species were determined to be needed.

Subsequent to the completion of the Draft EIR, protocol surveys for the southwestern willow flycatcher (*Empidonax trailii extimus*) were conducted on May 20, June 3, June 10, June 27, and July 5, 2016, as noted in Topical Response 2, Biological Resources. In addition, surveys for the black-flowered figwort (*Scrophularia atrata)* in accordance with protocol requirements on July 26, 2016. Both studies contain more recent floral and faunal species within the Project site.

Please refer to Topical Response 2, Biological Resources and Topical Response 6, Mitigation Area.

Response 2-8

Please refer to Response 2-7.

Please refer to Topical Response 2, Biological Resources. As previously stated, additional special-status species surveys were completed subsequent to the release of the Draft EIR to determine presence/absence. The *Habitat and Natural Resources Assessment for the Lompoc Motorsports Park* prepared by BioResource Consultants Inc. (see Appendix 4.3 of the Draft EIR) indicated a medium likelihood of occurrence for southwestern willow flycatcher. Protocol surveys were conducted on May 20, June 3, June 10, June 27, and July 5, 2016, to determine presence/absence for southwestern willow flycatcher, as well as to document any other observed species within the Project site (see **Appendix 2.1.a, Southwestern Willow Flycatcher Protocol Survey** of the Final EIR). Protocol surveys were conducted between dawn and 10:25 AM under fair-weather conditions suitable for observing bird activity. The survey area is located outside and to the south of the active river channel, which was dry at the time of the survey. No saturated soils, standing water, or recently scoured channels were observed within the study area during the surveys (page 5 of Appendix 2.1.a of this Final EIR).

Additionally, a focused rare plant survey for black-flowered figwort (*Scrophularia atrata*) was conducted on 15 July, 2016 at the project site. The focused survey was conducted based on the initial biological assessment, conducted on 8 January, 2016, which determined the presence of suitable habitat and

nearby documented occurrences for black-flowered figwort. Prior to implementing the focused botanical surveys, standard database searches were conducted and reports from previous surveys of the area were reviewed to obtain pertinent information regarding documented and potential occurrences of special-status species and habitat types, including more recent occurrences of black-flowered figwort in the vicinity of the Project area.

Seventy-five plant species were observed during the proposed Project survey. Of those 75 species, 49 are native species and 26 are non-native **(Appendix 2.1.b of the Final EIR).** The proposed Project site provides habitat for black flowered figwort within riparian scrub habitat within the Arroyo Willow Thicket and Coyote Brush Scrub). However, the understory in those communities consists of dense cover of poison oak (*Toxicodendron diversilobum*) and poison hemlock (*Conium maculatum*), which are out-competing the black-flowered figwort and other native species. Black-flowered figwort was not observed during the survey. In addition, the surveyor did not observe any plants of the genus Scrophularia.

Given black-flowered figwort was not observed during either the initial proposed Project biological survey in January 2016 or the focused surveys conducted in July 2016; the understory of the available suitable habitat in the area is infested with non-native poison hemlock and native poison oak; and the most current record of the species in the vicinity of the proposed Project dates to 1954, black-flowered figwort is not expected to occur on the Project site and will not be effected by the Project.

Response 2-9

Please refer to Topical Response 2, Biological Resources. As stated in Section 4.3 Biological Resources of the Draft EIR, the proposed Project site is located within the Santa Ynez River streambed, but is located approximately 10 feet above the active stream channel and is not located directly within the active stream channel. The streambed is located within California Department of Fish and Wildlife (CDFW) jurisdiction.

Additionally, the proposed Project is designed so surface water runoff on site will be directed and contained in two infiltration basins one to the north of the drag strip and one extending along the south end of the drag strip. As such, all surface water runoff would be captured in these two areas with no runoff drainage into the Santa Ynez River.

As the proposed Project site does not impact directly or indirectly the river, there are no impacts to steelhead, there is no jurisdiction for the National Marine Fisheries Service.

Response 2-10

Please refer to Response 1-7 and the Draft EIR (see pages 4.3-39) which evaluates impacts to wildlife movement that would result from the proposed Project. As stated in the Draft EIR, proposed Project development and construction would result in the loss of habitat associated that provides cover and foraging area for migratory species. Off-site, adjacent habitat exists between the proposed Project and the Santa Ynez River and will remain intact, providing an open space buffer and suitable foraging and cover for wildlife moving along the river.

The loss of that habitat will not disrupt the continuous riparian forest extending from the Santa Ynez estuary to the proposed Project site as similar forested habitat is found on the north and south of the river extending to the east and west. In addition, the semi-vegetated river channel provides cover and forage for movement of wildlife. Proposed Project construction and operation would not obstruct animal or plant dispersal along the Santa Ynez River as the proposed Project site does not include any of the river. Therefore, no direct impacts are expected to affect wildlife movement and connectivity.

Further, as discussed in Section 4.3 Biological Resources in the Draft EIR, Mitigation Measure 4.3-1 would off-set impacts to arroyo willow thicket, which includes trees, on site (14.5 acres), and off-site mitigation would be implemented at a 5 to 1 ratio to equal 72.5 acres. As discussed, any future mitigation site may be subject to review and approval by the California Department of Fish and Wildlife (CDFW) and would be subject to the conditions of SAA No. 5-2001-0252.

Please refer to Topical 4, Indirect Biological Impacts. As discussed, noise levels, vibration, dust and lighting impacts would be temporary and limited to proposed Project events. Therefore, indirect impacts would be less than significant. Further, light emitted beyond the site's boundaries would only reach a maximum of 0-1 fcs. Based on the low light intensity offsite and the temporary nature of nighttime lighting, indirect lighting impacts would be less than significant.

In response to the proposed Project use of chain link fencing, the City could require as Condition of Approval of the proposed Project, use of wildlife friendly fencing. It should also be noted, as part of airport compliance with wildlife hazard management, chain link fencing does currently extend the length of the existing airport runway and will remain as such.

Please refer to Topical Response 3, Hydrology, and Response 2-5 regarding the 100-year floodplain.

Response 2-11

As discussed in Section 4.3 Biological Resources in the Draft EIR, Mitigation Measure 4.3-1 would off-set impacts to arroyo willow thicket on site (14.5 acres), and off-site mitigation would be implemented at a

5 to 1 ratio to equal 72.5 acres. In addition, please refer to Topical 2 regarding proposed mitigation, and Topical 6 regarding the off-site mitigation area. As discussed, implementation of Mitigation Measure 4.9-7 would reduce impacts to the loss of the mitigation area to less than significant.

Please also refer to Response 2-10.

Response 2-12

The 7.1-acre mitigation area was originally established and soon after it failed. It was replanted and failed once again. The reasons for failure of the 7.1-acre mitigation area include drought conditions, weed infestation, vandalism or management of the mitigation area. Additional items to be considered should be current soil conditions and current hydrogeomorphology and surrounding and historic uses. For those reasons, an alternative site may prove to be a viable and possibly preferable alternative. As previously stated, any future mitigation site may be subject to review and approval by CDFW and would be subject to the conditions of SAA No. 5-2001-0252. CDFW may request additional conditions if an alternate location other than the original mitigation site is utilized.

Refer to Topical Response 2, Biological Resources, and Topical Response 6, Mitigation.

Response 2-13

Please refer to previous responses regarding mitigation and CDFW involvement. As described in Section 4.3 of the Draft EIR, the City of Lompoc 2030 General Plan Conservation and Open Space Element contains descriptive information related to natural resources and open space that is relevant and of concern to Lompoc.[19] Specifically, the Conservation and Open Space Element addresses the goal and policies related to biotic resources. Implementation of the proposed Project would result in the loss of approximately 14.5 acres of AWT, a riparian habitat associated with the Santa Ynez River that provides cover and foraging area for migratory species. **Mitigation Measure MM 4.3-1** requires the replacement, at a 5:1 ratio, of AWT which includes individual trees. As the AWT is a significant biological habitat, and a sensitive and critical habitat as recognized by the policies in the Conservation and Open Space Element, the loss of such is not consistent with those policies. However, consistent with the Conservation and Open Space Element policies, project specific mitigation measures are required. In addition to Mitigation Measure **MM 4.3-1**, **Mitigation Measures MM 4.3-2** through **MM 4.3-8** would minimize potential impacts to wildlife habitats and species.

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19 City of Lompoc, *2030 General Plan*, "Conservation and Open Space Element."

Also refer to Topical Response 2, Biological Resources, regarding additional surveys conducted on May 20, June 3, June 10, June 27, and July 5, 2016.

Response 2-14

As stated in the Draft EIR, the proposed Project site has previously been used by a succession of businesses, including sand and gravel operations, an asphalt plant, a metal fabrications business, a roofing company, scrap metal processing, and contractor equipment yards. Currently, the proposed Project site's condition is that of abandoned industrial uses. However, the City's current zoning and land use designations, Public Facilities and Community Facilities, respectively, are in line with the proposed reuse of the Project Site as a Motosport Park. Those before mentioned historic uses, and the proposed uses are governed by numerous state and federal laws which address hazardous substances.

State and federal laws require detailed planning to ensure hazardous materials are properly handled, used, stored, and disposed of, and, in the event such materials are accidentally released, to prevent or to mitigate injury to health or the environment. The Applicant would be required to comply with those state and federal laws, in addition to other requirements such as mandatory preparation and compliance with a Hazardous Materials Business Plan.

Further, as stated in the Draft EIR, Section 4.7 Hazards and Hazardous Materials, a variety of State and federal laws govern the generation, treatment, and/or disposal of hazardous wastes. The City Fire Department and Santa Barbara County Department of Public Health, Hazardous Materials Division inspect on-site uses and enforce State and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. Acting as the County's designated CUPA, the County of Santa Barbara Fire Department Hazardous Materials Unit requires an annual inventory of hazardous materials in use on site, as well as an HMBP, be submitted for an annual review, as required by the Emergency Planning and Right-to-Know Act and the California Accidental Release Prevention Program. Those requirements would be mandated according to State and federal law. Compliance with those regulatory measures during operation of the proposed Project would not result in a significant impact to the exposure of hazardous materials.

Additionally, as discussed in Section 4.8 Hydrology of the Draft EIR, the proposed Project would include risks for hazardous spills such as fuels on site. The Santa Ynez River is located adjacent to the proposed Project site's northern boundary. However, runoff from a potential spill would not flow into the river because of the proposed Project's storm water capture design. That design allows surface water runoff to be directed into two infiltration basins extending on either side of the drag strip and return road. All surface water runoff would be captured in those two areas with no runoff draining into the Santa Ynez

River. Therefore, impacts related to the release of hazardous materials into the environment would be less than significant.

Please refer to Topical Response 3, Hydrology—Water Quality.

Response 2-15

As previously stated, the proposed Project, while largely vacant, does contain some remaining debris (concrete slabs) from prior uses, which are considered impervious on the site is approximately 26,000 square feet (0.6 acres). Those existing concrete slabs would be removed as part of the proposed Project.

As discussed in Section 4.8 of the Draft EIR, the proposed Project would not impede on percolation of groundwater and would provide for surface water to be collected at two proposed infiltration basins.

The proposed Project site would not impede the percolation of groundwater and would provide for surface water to be collected at two proposed infiltration areas. The proposed Project site would be graded to direct stormwater from the edges of the site toward the center. Surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River. Those areas include: Infiltration Area A would cover an area approximately 44,300-square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet (cu. ft.) of stormwater; and Infiltration Area B would be approximately 34,500-square feet in size, with an average depth of 3.6-inches, and would contain approximately 10,270-cu. ft. of stormwater. Together, those areas would provide a total of approximately 13,830 cu. ft. of stormwater capture. The parking areas would include materials to minimize compaction, including wood chips and decomposed granite. The two existing 10-inch drain pipes would be extended north from their current terminus under the proposed access road and drain into the proposed infiltration areas. The concrete paved area for the drag strip, return road and staging areas would also drain into the proposed infiltration areas. Please also refer to Topical Response 3, Hydrology.

It should also be noted, the proposed Project would be required to comply with current regulations of the RWQCB and the City's Stormwater Management Program (SWMP) and Central Coast Regional Water Quality Control Board.

Response 2-16

Please refer to Topical Response 4, Indirect Biological Resource Impacts, regarding indirect biological impacts. As discussed, proposed Project operation, noise levels, vibration, dust and lighting impacts

would be temporary, and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

Response 2-17

Please refer to Topical Response 4, Indirect Biological Resource Impacts.

It should be further noted, due to the close proximity of the Lompoc Airport, wildlife species in and near the proposed Project site would be accustomed to the proposed noise levels. However, the buffer parameters stipulated in **Mitigation Measures MM 4.3-3** and **MM 4.3-4** as required by the CDFW include all environmental factors and take into account all contingencies to reduce impacts to sensitive species. If sensitive species are found, then those buffer parameters reduce impacts to potential habitat by providing buffers to limit the physical presence and potential disturbances from humans. Those guidelines do not specifically establish noise criteria; however, they do take into account all environmental factors, including noise. Furthermore, the motorsports sound is not continuous sound because events would occur during different times of day and night, with a maximum of 16 hours only on specialty drag race event days. The sound would occur for a few minutes intermittently, for periods of between 2 and 9 hours per day for most events. As such, the motorsports events sound would be temporary and would not result in significant impacts to sensitive species. Impacts would be less than significant.

Response 2-18

Please refer to Topical Response 4, Indirect Biological Resource Impacts, regarding dust impacts. Those impacts would be temporary, and limited to proposed Project events. Further, as discussed in the Draft EIR, Section 4.2, Air Quality, **Mitigation Measure MM 4.2-1** in Section 4.2, a Fugitive Dust Control Plan shall be prepared and submitted to the City and Santa Barbara County Air Pollution Control District (SBAPCD) for review and approval before proposed Project operation. Measures within the Fugitive Dust Control Plan include paved on-site access roads extending from George Miller Drive and V Street; open and riding trail areas limited to 14 off-highway-vehicles (OHVs) per hour; and the requirement all ground surfaces within OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent. The Fugitive Dust Control Plan would control emissions of airborne particulate matter to ensure the levels are below the 8 $\mu g/m^3$ SBAPCD threshold. Dust impacts to wildlife species were determined to be less than significant.

The proposed Project's sources of water, water supply, and demand quantities is based predominantly on the City's 2010 Urban Water Management Plan (UWMP), the City's Groundwater Management Plan, and the City General Plan. The City's UWMP contains the current and future availability of water

resources within the City of Lompoc based on land uses. As discussed in the City's 2010 UWMP, the commercial, institutional, and industrial sectors are projected to increase water demand approximately 146 acre-feet per year (afy) over the next 20 years (this is being updated in the 2015 Urban Water Management Plan).[20] The proposed Project's 7.95 afy would account for approximately 5 percent of the increase in projected water demand in the commercial, institutional, and industrial sectors over the next 20 years. Therefore, the City has adequate water supplies to meet the demands of the proposed Project.

The number of units of water has been clarified to be "gallons." The onsite reservoir would hold approximately 5,000 gallons of water, as reflected in Section 3.0 of the Final EIR. The onsite reservoir would be enclosed and would not include an open water component. As noted in the Draft EIR (see page 4.3-31), any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW. Accordingly, the onsite facilities may be subject to Section 1602 from CDFW.

Response 2-19

Figure 5.0-1 has been modified to depict the correct location of Alternative A, which is located within Vandenberg Air Force Base property. See Section 3.0 of the Final EIR for the revision.

The Draft EIR Section 5.0, Alternatives, provides a discussion of six different alternative sites that were considered but not evaluated. A number of alternative sites were initially considered but rejected as infeasible. Those potential sites, as shown in Draft EIR **Figure 5.0-1**, were reviewed for their ability to meet the basic site criteria for the proposed Project objectives. To accommodate a proposed motorsports park, a site needs to be approximately 38 acres in size to provide enough land for the facilities and parking. To accommodate the traffic generated by the proposed Project, a suitable site needs to have efficient access to local roadways, which connect to regional roadways, such as State Route 1 (SR 1) and/or State Route 246 (SR 246). Additionally, the proposed Project site aims to remediate and restore land along the Santa Ynez River, to improve existing skydiving landing areas, to provide for implementation of mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project if still required, to improve runway safety zones, and to reduce illegal riding in the Santa Ynez River bed and street racing.

As evaluated in Section 5.0 (pages 5.0-4 through 5.0-7), Site A was eliminated because it would either need to be annexed into the City or processed through the County of Santa Barbara which would require

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20 The total projected 146 afy water demand increase includes the 137 afy increase from the commercial and institutional sector and the 9 afy increase industrial sector.

a zone change. Site B was eliminated because Alternative Site B is currently outside the City Limits, but inside the Urban Limit Line, and is designated as Community Facility. The site is currently located on zoned agriculture land, and as such, there could be a potentially significant impact to agriculture resources at this location. Furthermore, a zone change would be required as an outdoor recreation use would be inconsistent with the Santa Barbara County AG-II-100 zone. The removal of agricultural land around the City limits would be inconsistent with Policy 1.3 of the City's 2030 General Plan. Similar to Alternative Site B, Alternative Site C has some of the same issues since it is within unincorporated County of Santa Barbara. The motorsports park facility would be processed through the County of Santa Barbara which would require a zone change. As the site is currently being used as agricultural land, there could be potential impacts to agricultural resources. The removal of agricultural land around the City limits would be inconsistent with Policy 1.3 of the City's 2030 General Plan. Site D was eliminated because this site is outside of the City limits; however it is within the City's Sphere of Influence and the City's Urban Limit Line and designated as Community Facility. Residential areas are located directly west of that site and there may be a potentially significant impacts to noise. Site E was eliminated because the site would either need to be annexed into the City or processed through the County of Santa Barbara, which would require a zone change. Site F was eliminated because the site is located entirely within the County of Santa Barbara; and, therefore, the City would need to purchase the site or lease site from the Everett Family Exemption Trust.

All alternative sites would not avoid the significant impacts of the proposed Project, nor would such an alternative meet the basic objectives of the proposed Project. For those reasons, the above alternatives were not evaluated in detail in this Draft EIR.

State CEQA Guidelines*,* subdivision 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. According to the State CEQA Guidelines*,* if the No Project/No Development Alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the remaining Alternatives considered, the OHV Facility Only Alternative, would be considered environmentally superior, because it would result in the greatest reduction in VOC and NOx emissions and would result in the greatest incremental reduction of the overall level of impact when compared to the proposed Project. The OHV Facility Only Alternative would reduce, but not avoid or reduce to a level of less than significant, the significant daily mobile VOC and NOx emission impact identified for the proposed Project. Further, while the OHV Facility Alternative would only partially develop the site, it may not fully minimize impacts on natural resources.

Response 2-20

Please refer to Response 2-7 and Response 2-8.

Response 2-21

The comment is noted. The issue raised by the commenter addresses filing fee requirements and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 2-22

CEQA Guidelines Section 15042 provides, "a public agency the opportunity to disapprove a project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed." As indicated in the Draft EIR and in the additional clarification provided in the Topical Responses, all potential impacts to wildlife and vegetation communities would be reduced to a less than significant impact with **Mitigation Measures MM 4.3-1** through **MM 4.3-8**.

The City Council, as the lead agency, has the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. As noted in the CEQA Guidelines, Section 15093:

> *(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
>
> *(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
>
> *(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts. The information will be forwarded on to the decision makers.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
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AUG 15 2016

Planning Division

05-SB-1-22.5

August 15, 2016

Lucille Bresse
City of Lompoc
100 Civic Center Plaza
Santa Barbara, CA 93436

LOMPOC MOTORSPORTS PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Bresse:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and provide input on the Draft Environmental Impact Report (DEIR) for the Lompoc Motorsports Project as the proposed project anticipates increased ingress and egress to State Route 1. Caltrans offers the following comment based on the DEIR traffic analysis:

- The traffic study incorrectly assumes two approach lanes at the George Miller Drive/SR 1 intersection and that a Two-way Left Turn Lane (TWLTL) at this intersection currently exists. Assuming the two approach lanes almost doubles the approach capacity and the TWLTL also provides a refuge which increases intersection capacity. This allows for a better Level of Service (LOS) to be reported than what is actual. Revising the analysis to accurately reflect existing conditions would cause the intersection to operate at unacceptable LOS under Existing+Project Conditions. Accurately reflecting existing conditions is important to disclose as the DEIR forecasts an additional 117 weekday PM peak hour trips to be generated by the project. Caltrans requests that the city condition the applicant to construct an additional eastbound approach lane at the George Miller Drive/SR 1 intersection to mitigate for actual anticipated impacts. 3-1

Thank you for the opportunity to review the DEIR for the Lompoc Motorsports Project. Please feel free to contact me at 805-549-3800 or melissa.streder@dot.ca.gov if you have any additional questions.

Sincerely,

Melissa Streder

Melissa Streder
Planning and Development Review
Caltrans District 5

cc. Frank Boyle, Bruce Swanger, Hana Mengsteab

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter No. 3: Melissa Streder, Planning and Development Review, Caltrans District 5, Department of Transportation, August 15, 2016

Response 3-1

Please refer to the Draft EIR, Section 4.13, Traffic and Circulation, which states George Miller Drive is a two-lane local road that connects to SR 1 and serves the Lompoc Airport. As discussed in Section 3.0, Project Description, of the Draft EIR, the proposed Project would construct a 30-foot-wide road from the George Miller Drive entrance on the eastern end of the proposed Project site to connect with the new V Street access road on the western end of the proposed Project site. The George Miller Drive access point would be used for weekday access, private rentals for nonracing event access, and all emergency vehicle access to the proposed Project site. The V Street access point would be used for weekends, holidays, and special event access.

The Draft EIR notes that State Route 1 – H Street is located east of the proposed Project site, is a north-south California state highway. SR 1 is classified as a Major Arterial by the City, is named H Street within the City, and contains four lanes adjacent to the proposed Project site. H Street also includes a center left-turn lane north and south of Central Avenue. SR 1 extends north of Lompoc and connects to Vandenberg Village, Vandenberg Air Force Base, and the Santa Maria–Orcutt area. The posted speed limit is 45 miles per hour (MPH) north of George Miller Drive and 35 MPH south of George Miller Drive. The posted speed limit is 35 MPH north and south of Central Avenue.

The George Miller Drive connection to SR 1 is controlled by a stop sign for traffic outbound from George Miller Drive. As indicated in the Traffic Study (see Appendix 4.13 of the Draft EIR), the George Millar Drive/SR 1 intersection includes one inbound left turn lane and an outbound left/right turn lane. The overall existing LOS C with is 17.0 seconds in delay. As indicated in Table 4.13-8, the Existing Plus Project LOS is C with a delay of 16.2 seconds. It should be noted “Inbound Lefts” in Table 4.13-8 is mislabeled. The correction is “Inbound Left.”

While there are no direct impacts to H Street, the Draft EIR identifies the following mitigation that would affect H street:

MM 4.13-1 The proposed Project shall contribute its fair share contribution to the City’s improvement plan for the Central Avenue/H Street intersection prior to the issuance of building permits. The City identified improvements for the Central Avenue/H Street intersection, including the installation of dual left-turn lanes on the northbound and southbound approaches to the intersection.

The Draft EIR notes the City has been collecting fees from individual developments located in the study area to fund the implementation of the improvement at the Central Avenue/H Street intersection. The City's planned improvement at this intersection is to install dual left-turn lanes on the northbound and southbound approaches. Improvements would result in a LOS C under Cumulative plus Project conditions during the weekday PM peak hour.

Cumulative impacts would be less than significant with mitigation and the proposed Project would not be considered cumulatively considerable.

Mitigation Measure MM 4.13-2 would require the applicant develop a traffic control plan to lessen this potential impact of queuing into the Project site to less than significant. Compliance with existing regulations, **PDF 4.13-1**, and implementation of the **Mitigation Measures MM 4.13-1** and **MM 4.13-2,** would reduce potential proposed Project and cumulative transportation and traffic impacts to a less than significant level.

MEMORANDUM

RECEIVED

AUG 10 2016

Planning Division

Date:	Wednesday, August 10, 2016
To:	Lucille Breese, City of Lompoc – Planning Manager
From:	E. Steven Nailor, Santa Barbara County, PHD - EHS
RE:	Lompoc Motorsports Project – Draft EIR Comments

The Santa Barbara County Public Health Department, Environmental Health Services, Leaking Underground Fuel Tank (LUFT) and Site Mitigation Unit (SMU) appreciates the opportunity to comment on your Draft EIR for the Lompoc Motorsports Project

Based upon our review you have noted that there is the potential for up to four USTs located in the project area.

- You identify that either a geophysical survey or potential grading and excavation activities could have the possibility to uncover any unknown USTs."
- If no UST is found, at a minimum, a Soil Management Plan (SMP) will be prepared with details as how to properly handle and segregate any impacted soil, debris, stained, or odiferous soil that may be encountered, as well as for protection of workers and the public.
- If USTs are discovered you propose to properly permit their removal under permit with EHS' CUPA unit.
- If a release is found to have occurred you propose to undertake assessment and remediation activities under one of EHS' cleanup programs, LUFT or Site Mitigation.

EHS Comments and Requests

1. EHS recommends the EIR be finalized and not left as a "DRAFT." 4-1
2. EHS would appreciate the opportunity to review the Soil Management Plan. 4-2
3. EHS appreciates your inclusion of potential USTs into the Draft EIR and approves your proposed approaches to finding either existing USTs or contamination from previous USTs or site activities. UST removal soil samples shall be analyzed for the following: 4-3
   a. All soil samples shall be analyzed for full range Total Petroleum Hydrocarbons (TPH) from C4 - C40 via EPA Method 8015M. TPH ranges may be broken down per normal procedures for reporting fractions as gasoline, diesel and heavy oils.
   b. All of the soil samples shall further be evaluated for Volatile Organic Compounds (VOCs) via the current EPA Method 8260 series.
   c. A minimum of one soil sample from each UST location shall be analyzed for LUFT Metals (cadmium, chromium, nickel, lead, and zinc)
4. If the initial TPH and VOC sample results indicate a release has occurred; additional assessment will likely be required. Additional analytical testing may be required at that time, which may include other potential compounds of concern, such as testing for SVOCs, Metals, or PAHs. This will be determined if and when releases are found based upon the initial sampling, and or observations. 4-4

Letter No. 4: E. Steven Nailor, Santa Barbara County Public Health Department, Environmental Health Services, Leaking Underground Fuel Tank (LUFT) and Site Mitigation Unit (SMU), August 10, 2016

Response 4-1

Comment noted.

Response 4-2

If the City approves the proposed Project and adopts the mitigation measures, then the City would be responsible for assuring the measures are completed as required by the CEQA Guidelines Section 15097. The Santa Barbara County Public Health Department, Environmental Health Services will be sent a copy of the Soil Management Plan (SMP) prior to the issuance of building permits.

Response 4-3

The comment identifies criteria for analyzing soil samples for the following: Total Petroleum Hydrocarbons (TPH) from C4-C40 via EPA Method 8015M; Volatile Organic Compounds (VOCs) via EPA method 8260; and a minimum of one soil sample from each UST location shall be analyzed for LUFT Metals (cadmium, chromium, nickel, lead, and zinc). The City will add these items as a condition of approval to the SMP.

Response 4-4

Please refer to Response 4-3 which addresses potential discovery and protocol for assessment and remediation in conformity with EHS standards. If testing indicates a release has occurred, then the SMP shall include additional analytical testing for potential compounds of concern, such as testing for SVOCs, Metals, or PAHs. The City will add those items as a condition of approval to the SMP.

County Of Santa Barbara

Mona Miyasato
County Executive Officer

105 East Anapamu Street, Room 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

October 5, 2016

Lucille Breese, Planning Manager
City of Lompoc
Economic Development Department, Planning Division
100 Civic Center Plaza
Lompoc, CA 93438
E-Mail: L_BREESE@ci.lompoc.ca.us

Re: City of Lompoc Draft Environmental Impact Report for the Lompoc Motorsports Project

Dear Ms. Breese:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Lompoc Motorsports Project. At this time, the County submits the attached comments from the Fire, Planning & Development, and Public Health Departments. Although this is beyond the comment period, please accept the attached comments as part of the record. 5-1

If you should have further questions, please do not hesitate to contact my office directly at 805-568-3400, or Glenn Russell, Director, Planning and Development Department, at (805) 568-2085.

Sincerely,

Mona Miyasato
County Executive Officer

Enclosures: Santa Barbra County Fire Department Comment Letter, dated July 18, 2016
Santa Barbra County Planning & Development Letter, dated August 11, 2016
Santa Barbara County Public Health Letter, dated October 5, 2016

cc: Rob Hazard, Santa Barbara County Fire Department
Glenn Russell, Ph.D., Director, Santa Barbara County Planning and Development Department
Takashi Wada, MD MPH, Director, Santa Barbara County Public Health Department

Terri Maus-Nisich
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mpontes@countyofsb.org

Tom Alvarez
Budget Director
toalvarez@countyofsb.org

Letter No. 5: Mona Miyasato, County Executive Officer, County of Santa Barbara, October 5, 2016.

Response 5-1

Comment noted. The comments in the attached comment letter have been addressed in the Reponses to Comment Letters No. 73 through No. 75.

COMMENTS ON MOTORSPORTS PARK EIR FROM AIRPORT COMMISSION MEETING, AUGUST 1, 2016

1. **Tree Mitigation:**
   - Where are trees going to be re-planted?
   - Does project take acreage the Airport needs for tree mitigation for future expansion?
   - If we extend the runway further will we have less land to mitigate for trees?
   - Who will purchase extra land needed for tree mitigation?

   6-1

2. **EIR Project Objectives:**
   - States the project will provide for ongoing recreational uses for skydiving and improve existing landing areas. It will not, and will increase likelihood of severe injury to skydivers and motorsports participants. — 6-2
   - It will not minimize environmental impacts on natural resources, the airport, and neighboring residents. The impacts will be substantial in all areas. — 6-3
   - States the project will provide compatible recreation opportunities adjacent to the Lompoc Airport. The use is not compatible with airport and its associated safety zones.
   - It is on the airport property used for aviation purpose, not adjacent to the property.
   - The project will not preserve and/or minimize impacts to existing airport tenants, operations, and users.
   - The project will not improve runway safety zones, but make it magnitudes worse for airport and motorsports park users.

   6-4

   - What will procedure be for accidents at Airport & Motorsports Park? — 6-5

3. **Noise, Traffic & Air**
   - There was only one noise sample taken from a Drag vehicle.
   - Started noise study with the wrong noise levels.

   6-6

   - Traffic will be backed up on H St., O St., V St.
   - Will traffic lights be installed?
   - There are traffic/visibility issues or George Miller Dr.

   6-7

   - Will stadium lights confuse pilot trying to land or depart? — 6-8
   - Dust and particulate matter will be a problem. — 6-9

4. **Natural Habitat:**
   - Oil and debris from vehicles will flow into the river. — 6-10
   - Wildlife will be driven out. — 6-11
   - Suggested holding ponds will cause toxins to leach into the soil and possibly the water table. — 6-12

Jeff Palmer, Commission Chairperson

8-12-16
Date

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AUG 12 2016
Planning Division

Letter No. 6: Jeff Palmer, August 12, 2016

Response 6-1

Please refer to Topical Response 2, Biological Resources, and Topical Response 6, Mitigation Area which address tree mitigation, as well as other biological resource issues. Also, please note the proposed Project would not involve the extension or expansion of airport runways.

Response 6-2

Please refer to Topical Response 8, Skydive Landing Zone, which addresses the proposed Project's potential impacts to the existing operations of Skydive Santa Barbara (SDSB), located at the Lompoc Airport.

Response 6-3

Topics evaluated in the Draft EIR have been identified based on the responses to the NOP and the review of the proposed Project by City staff. The City determined through that initial review process impacts related to the following environmental topics are potentially significant and require an assessment in the Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Traffic and Transportation
- Utilities and Service Systems

The Draft EIR does not propose or favor any action on the proposed Project; it's purpose is to inform decision makers of the potential impacts of the proposed Project if it were to be approved.

Response 6-4

Please refer to Topical Response 5 regarding land use compatibility and Topical Response 1 regarding airport safety. As discussed, the proposed Project is consistent with the City's current land use designation and zoning requirements. As discussed, the FAA approved the City's proposed Airport Layout Plan (ALP) in 2011. The approved ALP does not include any improvements in the area where the proposed Project is to be located. Currently, the ALP is being updated to include additional improvements including the proposed Project, a sewer line running sub-surface, and a capital improvement plan to upgrade electrical features and rehabilitate the Airport's north apron. In addition, the Lompoc Airport Master Plan Update does not include any future improvements within the proposed Project's boundaries. Any revisions to the ALP are subject to review and approval by the FAA before the City can implement the proposed Project. The proposed Project is considered to be a compatible use for both areas.

Response 6-5

As discussed in Section 4.11.1, Fire Protection Services of the Draft EIR, the Applicant will coordinate with the Lompoc Fire Department to develop and implement an Incident Plan required by **Mitigation Measure MM 4.11-1**. The Incident Plan shall identify the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications and supervisory personnel. In addition, the Plan would also identify fire suppression equipment, supplies, and other services to be provided by the site operator during future motorsports events, including the number of fire personnel and/or EMS personnel.

Additionally, as discussed in Topical Response No. 1 regarding airport safety, the Lompoc Airport is expected a probability of about 0.11 off-airport accidents per year for its current estimated activity level of approximately 30,000 annual operations.[1] The proposed Project would have a negligible effect on Airport accident risks because the Project neither increases nor decreases the number of landings or takeoffs associated with the Airport. The probability of accident/safety hazard risks would be similar before proposed Project implementation and after Project implementation. Impacts related to Airport accident risks would be less than significant.

Response 6-6

Please refer to Topical Response 7, Noise, for a full discussion regarding noise methodology.

1 Heliplanners, Aviation Safety Analysis (March 2016)

Response 6-7

Please refer to the Draft EIR, Section 4.13, Traffic and Circulation which addresses the proposed Project's potential impacts regarding traffic. The study area intersections are forecast to continue to operate at the same LOS as existing conditions under Existing plus proposed Project conditions. All of the six study area intersections for the weekend peak hour would continue to operate at LOS C or better under Existing plus proposed Project conditions. Therefore, impacts from the proposed Project would be less than significant.

The Central Avenue / H Street intersection is forecast to have a 1.0 second/vehicle delay increase and would continue to operate at LOS D, which would be a potentially significant impact. As stated in the Section 4.13 of the Draft EIR, the City has been collecting fees from individual developments located in the study area to fund the implementation of the improvement at the Central Avenue/H Street intersection. The City's planned improvement at that intersection is to install dual left-turn lanes on the northbound and southbound approaches. Improvements would result in a LOS C under Cumulative plus proposed Project conditions during the weekday PM peak hour. Table 4.13-14, Central Avenue/H Street – Mitigated Levels of Service, identifies the LOS for the intersection assuming the planned improvements. **Mitigation Measure MM 4.13-1** requires the proposed Project's fair-share fee contribution for the improvements at this intersection. Proposed Project impacts at Central Avenue/H Street would be mitigated to less than significant with implementation of **Mitigation Measure MM 4.13-1**. Cumulative impacts would be less than significant with mitigation and the proposed Project's would not be considered cumulatively considerable. Since cumulative plus proposed Project traffic would be mitigated to less than significant, proposed Project traffic would also be mitigated to less than significant.

Sight distances were evaluated using the sight distance standards contained in the Caltrans Highway Design Manual,[2] at the George Miller Drive connection to determine if the sight lines along SR 1 are adequate for turning from George Miller Drive (refer to page 4.13-23 and 4.13-24). The minimum required sight distance for vehicles turning onto SR 1 from George Miller Drive, with the existing speed limits of 50 mph to the north and 45 mph to the south, is 495 feet. However, Caltrans speed survey's show the actual southbound speeds at 50 MPH. The Caltrans corner sight distance criteria is 550 feet for highways with 50 MPH speeds. Drivers exiting George Miller Drive should be able to see SR 1 oncoming traffic for a minimum of 550 feet.

The sight distance looking to the north from George Miller Drive is limited to 378 feet by the existing chain link fence that extends along the west edge of SR 1. Assuming vehicles first stop at the stop bar present

2 Highway Design Manual, *California Department of Transportation*, 6th Edition, Updated May 2012.

on George Miller Drive, the edge of the SR 1 travel lane provides sight distances looking to the north and south that exceed 1,000 feet, which is in excess of the 550-foot minimum.

Additionally, adequate gaps for turning were analyzed for both to and from SR 1. SR 1 contains a left-turn lane on northbound SR 1 for turning into the site and adequate gaps exist in the southbound SR 1 traffic stream for vehicles to turn left from northbound SR 1 onto George Miller Drive. A peak queue of 28 feet, about 2 vehicles, is forecast for the northbound left turns from SR 1 entering the proposed Project site assuming Cumulative plus proposed Project conditions. The existing left-turn lane on SR 1 extends for approximately 500 feet. Thus, there is adequate capacity for the inbound left turns from SR 1 into the proposed Project site during the PM peak hour period.

Response 6-8

As discussed in Section 4.1 of the Draft EIR and Topical Response 1, Airport Safety, Project lighting would be provided in the OHV area for evening and nighttime activities via a portable system. As proposed, the lighted areas by portable lights would illuminate approximately 5 to 7 acres. The drag strip area would include ten 55-foot-tall towers along the north side of the strip and five 55-foot towers along the south side of the strip for nighttime events (see Draft EIR Figure 4.9-7, Schematic of Transitional Surface). Each light would be shielded and angled downward to meet FAA standards, and would include aircraft warning lights atop each pole as required by **Mitigation Measure MM 4.9-1.** Security lighting would also be provided in the pit area, near the west end of the drag strip, in the grandstand area, in the OHV area east of the oval track, and in the central parking area. However, light emitted by on-site usage would not be substantially projected off the Project site and would be confined to the internal boundaries of the proposed Project. In addition, an LED timing board would be provided on the proposed Project site. All lighting shall conform to the standards set forth in the Lompoc Municipal Code.

Light intensity along the drag strip would be about 10 to 50 foot-candles (fc) and light intensity just beyond the drag strip would be about 1 to 10 fc. Light emitted beyond the site's boundaries would only reach a maximum of 0 to 1 fcs. As noted in the Draft EIR, Section 17.068.030 of the Lompoc Municipal Code requires a development plan for the proposed Project.

Response 6-9

As discussed in the Draft EIR, the proposed Project particulate emissions would exceed the local significance thresholds for particulate matter (8 $\mu g/m^3$). In accordance with **Mitigation Measure MM 4.2-1,** a Fugitive Dust Control Plan would be implemented that would require application of a water amendment with a minimum 84 percent control efficiency and would also require the V Street access

road be paved. **Mitigation Measure MM 4.3-2** would require limitations with respect to the operation of the OHV component of the proposed Project.

Response 6-10

Please refer to Response 2-14. In addition, please refer to Topical Response 4, Indirect Biological Resource Impacts and Topical Response 3, Hydrology. Those responses address potential Project related impacts pertaining to water quality and the Santa Ynez River.

Response 6-11

Please refer to Response 1-7 specific to wildlife movement. In addition, please refer to Topical Response 2, Biological Resources, and Topical Response 4, Indirect Biological Resource Impacts.

Response 6-12

Please refer to Response 2-14 and Topical Response 3, Hydrology which address potential Project related impacts pertaining to water quality and the Santa Ynez River.

SBCAG
santa barbara county association of governments

260 North San Antonio Road, Suite B ▪ Santa Barbara, CA ▪ 93110
Phone: 805/961-8900 ▪ Fax: 805/961-8901 ▪ www.sbcag.org

August 12, 2016

RECEIVED
AUG 12 2016
Planning Division

Lucille Breese, AICP
Planning Manager
City of Lompoc
Economic Development Department/Planning Division
100 Civic Center Plaza
Lompoc, CA 93438-8001

Re: SBCAG Comments on the DEIR for City of Lompoc Motorsports Park Project

Dear Ms. Breese:

Santa Barbara County Association of Governments (SBCAG) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Lompoc Motorsports Park project and provides comments related to our role as the Airport Land Use Commission for Santa Barbara County and the project's proximity to the Lompoc Airport.

Role of the ALUC

State law requires SBCAG, as the designated Airport Land Use Commission (ALUC), to develop and implement an airport land use plan for each public use, general purpose airport in the County. The purpose of the law is "to prevent the creation of new noise and safety problems, and to protect public health, safety, and welfare by ensuring the orderly expansion of airports, and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards..." State Aeronautics Act, Public Utilities Code Section 21670(a) (2). As described in the Airport Land Use Plan (ALUP), aircraft overflight exposes individuals in the community to potential hazards associated with aircraft accidents and noise impacts.

As required by State law, the following types of land use actions shall be referred to the Airport Land Use Commission (ALUC) for determination of consistency with the Airport Land Use Plan prior to their approval by the local agency:

- The adoption, approval or amendment of any General Plan or zoning change (Public Utilities Code §21676(b)) that affects allowable land uses within the Airport Influence Area (AIA).
- Adoption or modification of an airport master plan for any one of the Airports (Public Utilities Code §21676(c)).

- Any proposal for construction of a new airport or heliport (Public Utilities Code §21661.5).

As noted in our comment letter provided for the Scoping for the project EIR (dated December 22, 2015), the City of Lompoc is not required to refer the project to the ALUC for a determination of consistency with the adopted Airport Land Use Plan because the project would not amend the City's General Plan or change the zoning. However, in our review of the DEIR and conversations with City staff, it is our understanding that the City is in the process of updating its Airport Layout Plan and Airport Master Plan, which will incorporate the features and design of the Lompoc Motorsports project on the Airport property. As noted above, State law requires that the Airport Master Plan be referred to the ALUC for a determination of consistency with the ALUP prior to adoption. To the degree that the Airport Master Plan incorporates features of the project and the project is inconsistent with the ALUP, the Airport Master Plan may also encounter issues of consistency with the ALUP. The advisory ALUC staff comments provided below should help to inform the City in its review of the Lompoc Motorsports project and provide additional information regarding ALUC review of the Airport Master Plan when it is referred to SBCAG at a later date. 7-1

Project Description

The project site is located on the Lompoc Airport property, north of the runway and south of the Santa Ynez River. The existing General Plan land use designation for the site is Community Facility and the zoning designation is Public Facilities. The project is seeking a Conditional Use Permit for the project. The project proposes a phased development of an off-highway vehicle area, an International Hot Rod Association (IHRA)-sanctioned drag strip facility, and a relocated skydiving landing area. A centralized parking area would be provided for both the OHV area and the drag strip and access would be provided via George Miller Drive. Event access at the drag strip would be provided through the existing gate at the north end of V Street. Each of the components of the project are discussed in more detail below.

Off-Highway Vehicle Areas

The existing Kids Moto Fun Park would be relocated and converted into an off-highway vehicle (OHV) area that will feature the following uses: 7-2

- A trail ride area on the easternmost portion of the project site on approximately 2.3 acres.
- A motocross track/mud bog and sand drag lanes area on approximately 4.6 acres.
- A 20-by-1,320 foot rhythm track on approximately 1.6 acres.
- A 100-by-250 foot arenacross track on approximately 0.57 acres
- A 100-by-250 foot endurocross and oval track/trials track on approximately 0.57 acres
- A one-eighth mile, 130-by-240 foot oval track for cycles, all-terrain vehicles, and carts
- Two beginner's tracks on approximately 0.6 acres.

The total size of the OHV site equals 10.24 acres. The intensity of the OHV area uses is summarized in the table below.

Off-Highway Vehicle Area

Event	Size (Range)
Weekday Non-Event	40-130 people
Weekend Non-Event	250-500 people
OHV Events	
- Quarterly (24/year)	600-900 people
- Regional (2/year)	700-1,200 people
- Rhythm regional (1/year)	800-1,500 people
Endurocross Events	
- Quarterly regional (3/year)	400-900 people
- Summer monthly (4/year)	300-600 people
Arenacross Quarterly regional (3/year)	300-700 people
Oval Track Events	
- Semiweekly cart races (25/year)	150-250 people
- Regional cart event (4/year)	300-600 people
- Regional speedway cycles (4/year)	450-700 people

Source: Lompoc Motorsports DEIR, Table 3.0-1

7-2

Drag Strip Area

The second component would feature a one-eighth-mile long drag strip, including grandstands to accommodate 1,250 spectators and pit areas for participants' vehicle crews and equipment. The project proposal indicates that the drag strip would be designed to be an International Hot Rod Association-sanctioned facility. The proposed grandstands would be located south of the drag strip. The drag strip would include a parking area, concession-truck parking, portable toilets, storage containers, and 90 pit spaces. The drag strip would be constructed approximately 10 feet below the active airport grade and within an existing FEMA-designated flood inundation area. Lighting for the drag strip would be provided on the north side of the strip and would be limited to 66 feet in height according to Federal Aviation Administration (FAA) regulations. Lights would be shielded and focused downward to meet FAA standards. The lights would also feature aircraft warning lights atop each pole.

The intensity of the drag strip area is summarized in the table below.

Drag Strip Area

Event	Size (Range)
Weekdays (50/year)	60-200 people
Weekend day racing (40/year)	200-280 people
Division finals (5/year)	300-600 people
Specialty drag race weekend (5/year) Specialty drag race event (5/year)	1,000-1,500 people 1,000-1,700 people

Source: Lompoc Motorsports DEIR, Table 3.0-2

7-2

Skydiving Facilities

The project is also proposing to relocate the airport's skydiving landing area to an area northwest of the end of Runway 7-25 (located between the taxiway and the runway).

Lompoc Airport Operations

The Lompoc Airport property is 140 acres in size and the Airport has one runway, Runway 7-25. Runway 7-25 is 4,600 feet long and 100 feet wide. The runway was extended to its current length in 2002. Runway 25 has a displaced threshold of approximately 116 feet to provide clearance over Highway 1/'H' Street, which borders the Airport to the east. The runway is served by two parallel taxiways, the north parallel taxiway and the south parallel taxiway. The north parallel taxiway is 50-feet wide and runs approximately 3/4ths of the runway distance.

7-3

In 2015, there were approximately 52 aircraft based at the Airport, including 47 single-engine propeller aircraft, one multi-engine propeller aircraft, and four ultralight aircraft. There were approximately 30,000 operations at the Airport in 2015, split equally between local and itinerant operations. The Airport's aircraft traffic is restricted to the north of the airport. Prevailing winds are from the northwest and the majority of arrivals and departures are to/from Runway 25. Helicopter traffic is minimal and operates from the runway.

Prior Comments

In reviewing the Notice of Preparation (NOP), SBCAG provided advisory comments for the project and scope of the environmental review in relation to the adopted 1993 Airport Land Use Plan and the draft Airport Land Use Compatibility Plan (ALUCP) update, currently in process (see Scoping comment letter from SBCAG, dated December 22, 2015). We appreciate the responsiveness to our comments in the DEIR.

7-4

Factors in the Consistency Evaluation of Projects – SBCAG's Airport Land Use Plan

As indicated previously, the City is not required to refer the project to the ALUC for a determination of consistency with the Airport Land Use Plan at this time. However, the ALUC is required to coordinate planning at the state, regional and local levels to provide for the orderly development of air transportation while at the same time protecting the public health, safety and

7-5

welfare. An Airport Land Use Plan was developed and adopted by SBCAG in 1993, which SBCAG is currently in the process of updating. It is our understanding that the City is in the process of updating its Airport Master Plan, which will eventually need to be referred to SBCAG for a consistency determination with the Airport Land Use Plan then in effect. In reviewing the DEIR, we are providing advisory comments for the project and scope of the environmental review in relation to the adopted Airport Land Use Plan as well as the draft Airport Land Use Compatibility Plan (ALUCP). These comments will help inform City staff of potential consistency issues and the land use compatibility of the site when completing the update of the Airport Master Plan. 7-5

The Airport Land Use Plan contains four broad criteria: height restrictions, land use compatibility, airport safety and noise. The DEIR should address consistency of the project with these criteria as part of its analysis. These criteria are discussed in additional detail below. Attachment 1 illustrates the project site map in relation to the Airport Land Use Plan safety overlays. 7-6

Height Restrictions: This criterion focuses on whether or not new structures or obstacles proposed in the clear and approach zones violate the height restrictions as defined in the Federal Aviation Administration (FAA) Federal Aviation Regulation (FAR) Part 77 "Objects Affecting Navigable Airspace." Part 77 sets forth criteria in terms of imaginary surfaces to safeguard and preserve navigable airspace. No structures or objects are permitted to penetrate these imaginary surfaces in order to ensure safe passage of aircraft in, and out, and around an airport. Generally, these critical airspaces include the imaginary surface of 50:1 slope for a precision (instrument) approach, the imaginary surface of 34:1 slope for a non-precision approach and the imaginary surface of 20:1 for general aviation runways. Part 77 also stipulates the Transitional Surface of 7:1 slope, rising from both edges of the clear and approach zones on each runway. Obstruction standards and procedure for notification of the FAA prior to construction or alteration of an existing or potential obstruction to navigable airspace are included within FAR Part 77. 7-7

By definition, any object that penetrates one of the imaginary surfaces is deemed an obstruction to air navigation. However, not all obstructions are necessarily hazards. The determination of whether an object would be a hazard to air navigation is made as part of an aeronautical study conducted by the FAA.[1] The Santa Barbara County Airport Land Use Plan adopts FAA FAR Part 77 height restrictions. According to the Airport Land Use Plan,

> *ALUP height restriction policy shall be:*
>
> - *To designate height restriction areas for all county airports as laid out in Chapters 4 and 6 of the Airport Land Use Plan;*
> - *To restrict the development of new incompatible land uses with airport height restriction areas which penetrate FAR Part 77 surfaces;*

- *To review any specific projects within the Airport Influence Area which may pose an intrusion into navigable airspace.*[2]

7-7

The draft ALUCP contains identical height restrictions. Runway 7 at the Lompoc Airport is a general aviation runway with a visual approach at a 20:1 approach slope.

Land Use Compatibility: Land use compatibility refers to various types of land uses in the airport vicinity that are compatible and incompatible with airport operation. The adopted ALUC determines land use compatibility based on three airport safety areas defined in the Airport Land Use Plan: Airport Safety Area 1 (Clear Zone), Airport Safety Area 2 (Approach Zone) and Airport Safety Area 3 (Traffic Pattern Zone). Each of these zones provides different levels of land use compatibility due to its relationship with airport operation. As shown on Attachment 1, the project site is located both within Safety Area 1 (Clear Zone) and Safety Area 3 (Traffic Pattern Zone) at the Lompoc Airport. The following discussion focuses on the land use compatibility criteria in these Safety Areas, which are defined as follows:

7-8

> *Safety Area 1 (Clear Zone)* is the most restrictive area as it is subject to greatest danger. It must contain no obstructions which extend into airspace requirements of landing aircraft as defined in FAA FAR Part 77. It is the FAA's recommendation that clear zones be airport property and, if airport property, that they be maintained as cleared fields with restricted access.
>
> *Safety Area 3 (Traffic Pattern Zone)* encompasses the remainder of Zone II (the Airport Influence Area) and is least restrictive. This is the area in which airport traffic patterns occur. Traffic patterns vary from airport to airport due to; runway configuration, prevailing winds, topography, population concentration, and noise abatement procedures.

Land use compatibility with respect to safety zones in draft ALUCP is addressed in Section D below.

Airport Safety: This criterion relates to the associated risk and potential consequences resulting from aircraft overflights and accident potential. Regular low-altitude aircraft overflights increase the risk of aircraft accidents. The consistency evaluation focuses on how the risk and consequences of aircraft mishaps could be minimized, if not avoided.

Within Safety Area 1, the ALUC defines incompatible land uses as follows:

7-9

- Any use which would direct steady or flashing lights at aircraft during initial climb or final approach, other than an FAA-approved navigational signal or visual approach slope indicator (VASI).

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[1] California Airport Land Use Planning Handbook, Caltrans Division of Aeronautics, October 2011, p. 3-31.
[2] Airport Land Use Plan Chapter 2, Chapter 5, p. 39.

- Any use which would cause sunlight to be reflected toward an aircraft on initial climb or final approach.
- Any use which would generate smoke or attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- Any use which would generate electrical interference that may be detrimental to operation of aircraft or airport instrumentation.

7-9

Within Safety Area 3, the ALUC recommends the following as incompatible land uses; any use which would result in large concentrations of people, such as schools, hospitals, apartment blocks, or shopping centers beneath downwind and base legs or departure paths of frequently used traffic patterns. For general purposes, the threshold for review is roughly 25 persons per acre for non-residential uses or more than four units per acre on residential land.[3]

Safety issues relative to the project and the draft ALUCP are discussed in Section D below.

Noise: Airport noise is an important consistency evaluation criterion. The Airport Land Use Plan noise criterion assures that new land uses proposed in airport environs are compatible with aircraft-generated noise. The Airport Noise Area is determined by using the California Airport Noise Standard which sets forth the criterion Community Noise Equivalent Level (CNEL). The Airport Land Use Plan has adopted policies for specific land use types within the 60 and 65 decibel (dB) CNEL noise contours. Generally, the project evaluation is based on the noise contours from the existing Airport Land Use Plan at the Lompoc Airport. The Airport Noise Area extent is based on anticipated airport operations over the next 20 years and unanticipated changes in operations may require new noise measurement and redefinition of the airport noise zone. The draft ALUCP will also incorporate 60 and 65 decibel (dB) CNEL noise contours and specify compatible land use types.

7-10

The adopted noise policies for land use types include institutional land uses (such as schools, hospitals, convalescent homes and other medical facilities) and residential uses. Since the project is proposing outdoor recreational and spectator events, the noise criterion policies contained in the Airport Land Use Plan and draft ALUCP would not apply to this project.

Comments on the DEIR

A. Height

Figure 1 shows the following project components in the Clear Zone:

7-11

- Re-located Quarry Road/western project access road
- A portion of the Re-located Skydive Landing area

[3] SBCAG Airport Land Use Plan, p. 41.

7

Neither of these two areas would contain structures. The DEIR states that the re-located Quarry Road is located approximately 300 feet west of the end of Runway 7. Runway 7 is a general aviation runway with a visual approach at a 20:1 approach slope. The height restriction for this area of the site according to the calculations in the Airport Land Use Plan and FAR Part 77 are shown below:

Height Restriction: 300' / 20 = 15'

The project description notes that:

> To provide weekend and holiday event access to the Project site, the proposed Project would connect to the existing V Street and go north along the western perimeter of the airport property, along an existing quarry road. When completed, this 30-foot-wide access road would be a minimum of 10 feet below the existing airport runway grade and would carry two-way traffic. The newly aligned access road would be dual purpose, serving both the Project site and the existing adjacent sand and gravel operation. The existing quarry road is currently within the 300-by-150-foot runway safety zone; however, the proposed Project would move the new access road outside of the runway safety zone.

7-11

Comment A1: In the absence of grading plans or site plans that show finished floor elevations for the western access road, there is not enough information to evaluate consistency with this criterion or determine potential impacts as a result of the provision of the access road through the clear zone. The DEIR should be revised to include grading plans with grading contours and elevations as well as any objects that may be included along the roadside (such as streetlights or landscaping that have the potential to penetrate into the airspace). The DEIR should also evaluate potential construction phase impacts as a result of cranes or other equipment used in construction of the proposed project in this area and potential for conflicts or hazards to air navigation with activities at the Lompoc Airport.

Comment A2: The DEIR states that "the proposed Project would move the new access road outside of the runway safety zone, as illustrated in **Figure 3.0-9, Conceptual Roads, Fences, and Gates (V Street Entrance)**." The current Lompoc Airport Layout Plan shows a trapezoidal Runway Protection Zone west of Runway 7 with dimensions of 500' x 700' x 1000', and a rectangular Runway Object Free Area, both extending outward from the end of the runway into the Santa Ynez River. The DEIR should examine the implications and potential impacts of construction of an access road for special event usage at the proposed drag strip within the clear zone, RPZ, and ROFA.

7-12

Comment A3: The Land Use Section of the DEIR discloses potential impacts utilizing the criteria contained in the FAR Part 77 and recommends appropriate mitigation and height limitations for structures and vehicles on the access road. How will this be enforced (e.g., through conditional use permit conditions)? What is the height of trucks and trailers that transport drag racing

7-13

vehicles? How tall are RVs that will be allowed to park in the area the evening before large events at the project site? 7-13

B. Land Use Compatibility

As noted in the project description, the project site would contain an off-highway vehicle area, an IHRA-sanctioned drag strip, and a re-located skydive landing facility. The project description notes that the OHV area would generate day-to-day operations of 40-130 people on weekdays and 250-500 people on weekends. The project description states that the OHV area will host up to 71 special events per year expected to generate between 150-1,200 people. The size of the OHV area would be approximately 10.24 acres. The drag strip would host a number of special events (approximately 105 per year) expected to generate a range of 60-1,500 people per event. The project description does not include an acreage calculation of the land area encompassed for the proposed drag strip area or viewing areas (such as the grandstands). 7-14

According to Table 4-1 of the Airport Land Use Plan, the land uses on-site would be compatible in Safety Area 3 as long as they do not result in large concentrations of people underneath downwind and base legs or departure paths of frequently used airport traffic patterns. The phrase "large concentrations of people" is defined in the Airport Land Use Plan as 25 people per acre or more for non-residential uses. The intensity (measured as people per acre) for the OHV area is summarized in the table below. The drag strip area and viewing areas were not included, since the DEIR does not include acreage information for this portion of the project. If there are grandstands or spectator viewing areas, the effective densities could be far greater than stated in the table below, potentially be hundreds of people/acre. Attachment 2 illustrates the project site location and the overlay of flight tracks and flight patterns at the Lompoc Airport. As shown, there is one flight track/pattern that would traverse the project site (LD3).

Project Density

Event Type	Size (People)	Density (people/acre) [a]
OHV Area		
Day-to-day		
- Weekday	40-130	4 – 13 people / acre
- Weekend	250-500	24 – 49 people / acre
Special Events		
- OHV Events (Quarterly, Regional, Rhythm regional)	600-1,500	59 – 146 people / acre
- Endurocross	300-900	29 – 88 people / acre
- Arenacross Quarterly regional	300-700	29 – 68 people / acre
- Oval track events (semiweekly races, regional, speedway cycles)	150-700	15 – 68 people / acre
Drag Strip		
Weekdays	60-200	
Weekend days	200-280	
Division Finals	300-600	unknown
Specialty drag race weekend (5/year)	1,000-1,500	
Specialty drag race event (5/year)	1,000-1,700	

[a] Assumes 10.24 acres on OHV site. Size for the drag strip area was not provided in the DEIR.

As shown in the table, population densities and intensities on the OHV area would range from as low as 4-13 people/acre on the weekdays to as high as 59-146 people/acre for the more popular OHV events. For any event that exceeds 250 people on the OHV area, "large concentrations of people," as defined in the Airport Land Use Plan, would be present.

Attachment 2 shows the project site in relation to the Airport Influence Area and the most commonly used arrival and departure flight paths at the Lompoc Airport. One flight path (LD3) is located above the project site and would place the project beneath a base leg/departure path of a frequently used traffic pattern for the airport.

7-14

Comment B1: The DEIR needs to include more information regarding the size (acreage) of the proposed drag strip area and viewing areas where spectators would be concentrated during events in order for ALUC staff to determine potential land use compatibility analysis for this area of the project.

7-15

Comment B2: The City should consider limitations on special events when developing the applicant's Conditional Use Permit for the OHV area. Conditions can include limiting the number of attendees, limiting airport operations during larger events (such as any event that would exceed 250 people or more), or not allowing the use of flight pattern LD3 during events that exceed 250 people.

7-16

C. Airport Safety

Airport safety primarily relates to the associated risk resulting from aircraft overflights and accident potential. Regular low-altitude aircraft overflights increase the potential for aircraft accidents. Therefore, a typical ALUC consistency evaluation will focus on the location and possible effects on the project site, and how the risk and consequences of aircraft accidents could be minimized. 7-17

Comment C1: See Comments A1-A3.

D. Consistency with the Draft Airport Land Use Compatibility Plan

SBCAG appreciates the inclusion of the analysis of potential consistency issues with the draft County Airport Land Use Compatibility Plan (ALUCP). The update of the draft ALUCP and environmental review is expected to commence by the end of this year and will take 12-18 months. The general findings regarding the placement of the safety zones and land use policies in rural areas are not expected to change, even with incorporation of any data that the Lompoc Airport may provide as part of its ongoing Airport Master Plan update. Attachment 3 shows the project site overlaid with the draft safety zones in the draft ALUCP (Figure 4.9-9 of the DEIR). 7-18

As shown, portions of the drag strip reside in Safety Zones 1, 2, and 5. The entire OHV area would reside within Safety Zone 5. For the purposes of safety in the drag strip area, the grandstands would be located in Safety Zone 1 (the clear zone), north of the runway at the Lompoc Airport. Outdoor assembly spaces of 50 or more people in the both Safety Zone 1 (clear zone) and Safety Zone 5 (sideline zone) are incompatible land uses in the draft ALUCP (see Attachment 4, Rural Safety Compatibility Policies).

The OHV area may be considered a "Non-Group Recreational" land use for the purposes of the draft ALUCP and would be a compatible land use as long as the intensity does not exceed 150 people per acre in Safety Zone 5.

Comment D1: The DEIR contains the following mitigation measure:

> MM 4.9-8: If the Draft ALUP is effective prior to the City's approval of the proposed project, then, within 60 days after that approval, the City Council will need to overrule the inconsistency between the new ALUCP and the City's General Plan.

7-19

MM 4.9-8 cannot properly be considered as a "mitigation measure" since it fails to offer any actual physical mitigation of potential project impacts. Further, under CEQA, inconsistency with a plan, such as an Airport Land Use Compatibility Plan, may be evidence of that the project will have a significant environmental effect. To the extent that the adopted ALUP or draft ALUCP provides potential mitigation for significant environmental impacts of the project, such mitigation measures must be adopted if they are feasible. (Pub. Resources Code § 21081(a)(3).)

Alternatively, if mitigation is not required, rejection of mitigation measures should also be supported by agency findings. (14 CCR §15091(a)(3).) 7-19

As noted above, SBCAG as the ALUC does not have direct review authority over the proposed project, although the pending update of the Lompoc Airport Master Plan is subject to review by the ALUC for consistency with the Airport Land Use Compatibility Plan in effect at time of adoption. While the City has the option under State law of overruling any inconsistency between the new ALUCP and the General Plan (or the Lompoc Airport Master Plan), SBCAG staff recommends that the City instead ensure through its permit process and mitigation of environmental impacts that the project design is consistent with FAA's FAR Part 77 surfaces, the California Airport Land Use Planning Handbook, the region's adopted Airport Land Use Plan and the draft Airport Land Use Compatibility Plan. 7-20

Thank you for the opportunity to review the project. If you have any further questions, please contact Senior Transportation Planner Andrew Orfila at 961-8907.

Sincerely,

Peter Imhof
Deputy Executive Director, Planning

cc: File (CP 03-04-19)
Richard Fernbaugh, Transportation and Aviation Administrator
Phillip Crimmins, California Department of Transportation, Division of Aeronautics

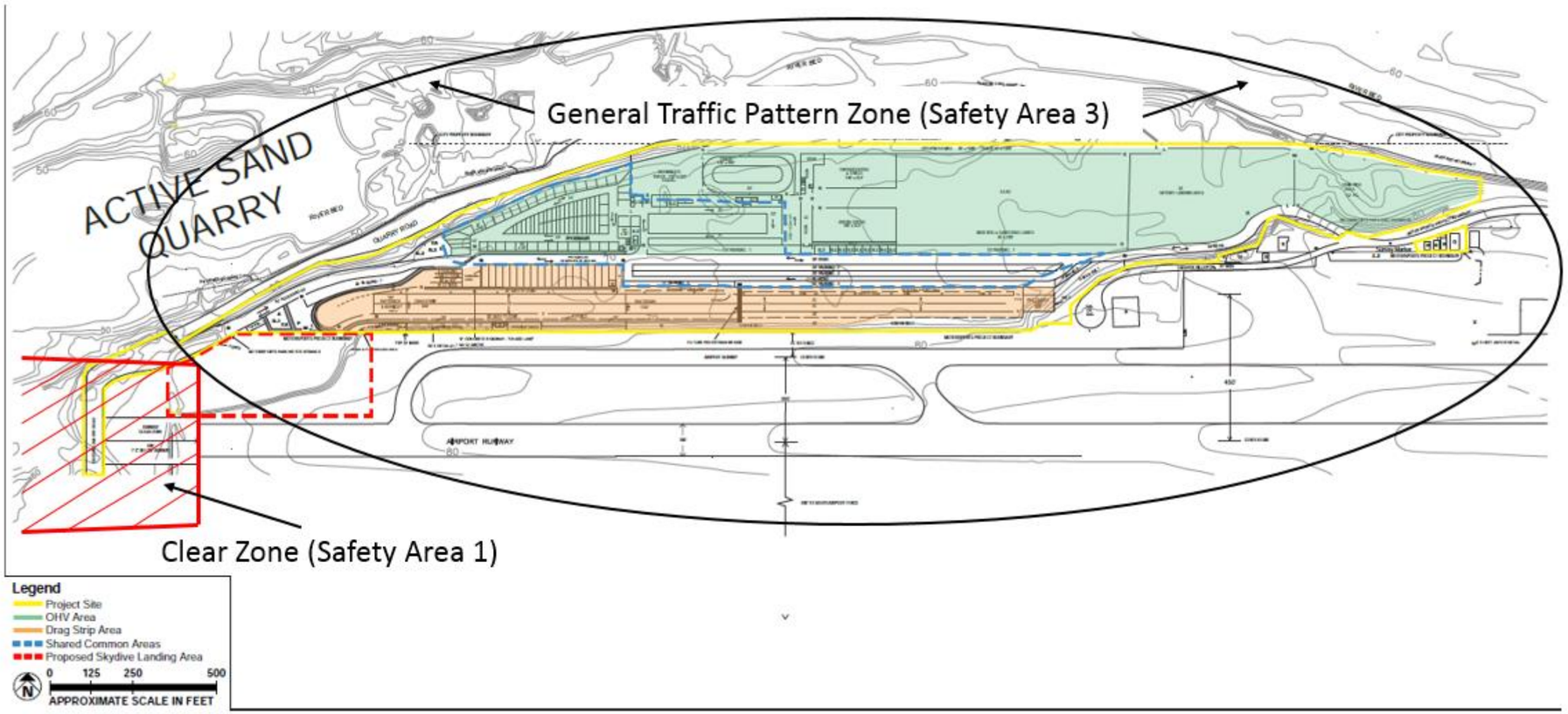
Attachments:

1. Project Site Map
2. Project Site with 1993 Airport Land Use Plan Safety Overlay
3. Project Site Map with Draft ALUCP Safety Overlay
4. Draft Santa Barbara County Airport Land Use Compatibility Plan – Rural Safety Compatibility Policies
5. California Airport Land Use Planning Handbook – Figure 4F: Safety Zone 5 Sideline Zone

7-21

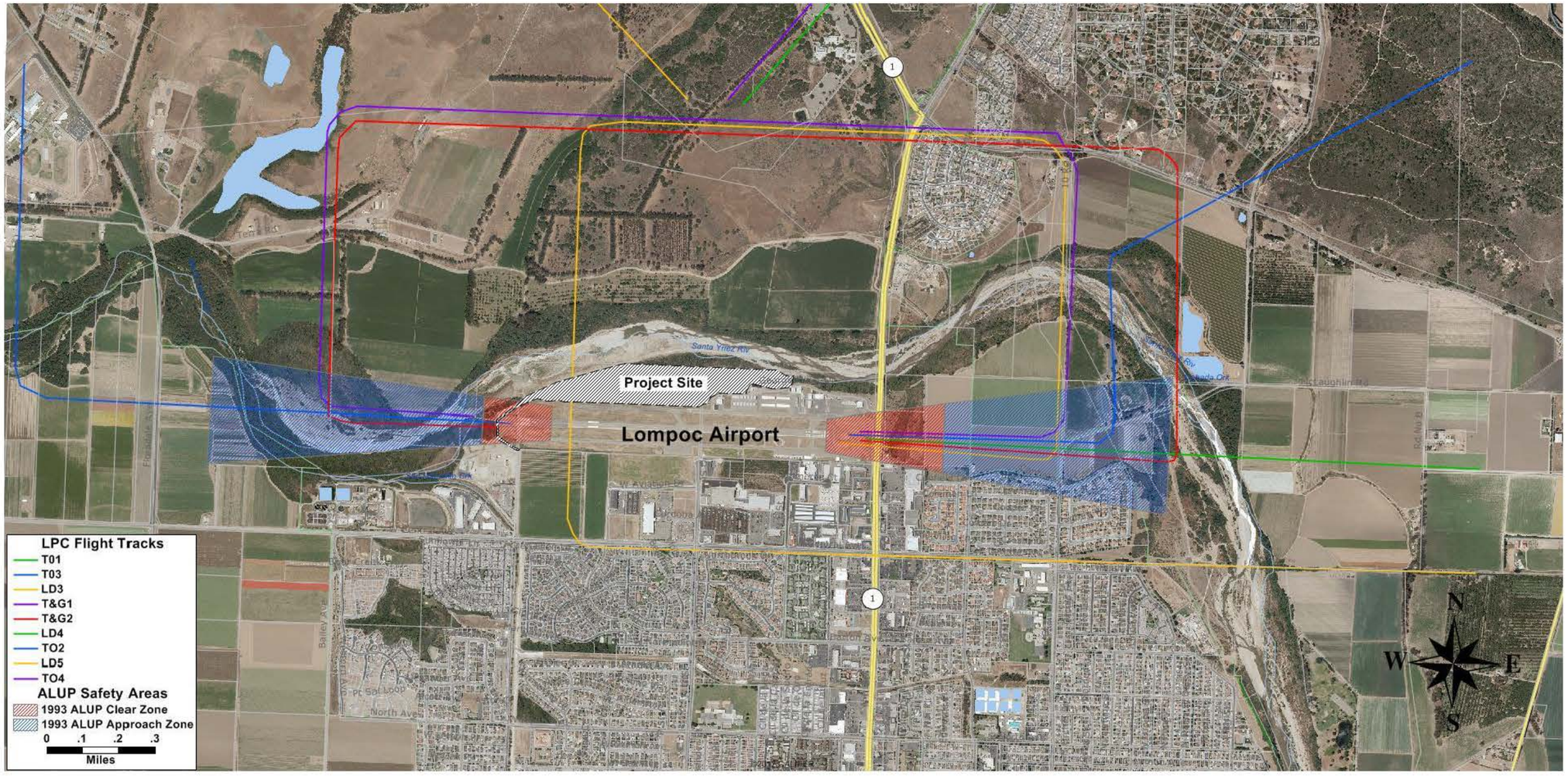
12

Attachment 1: Project Site Map

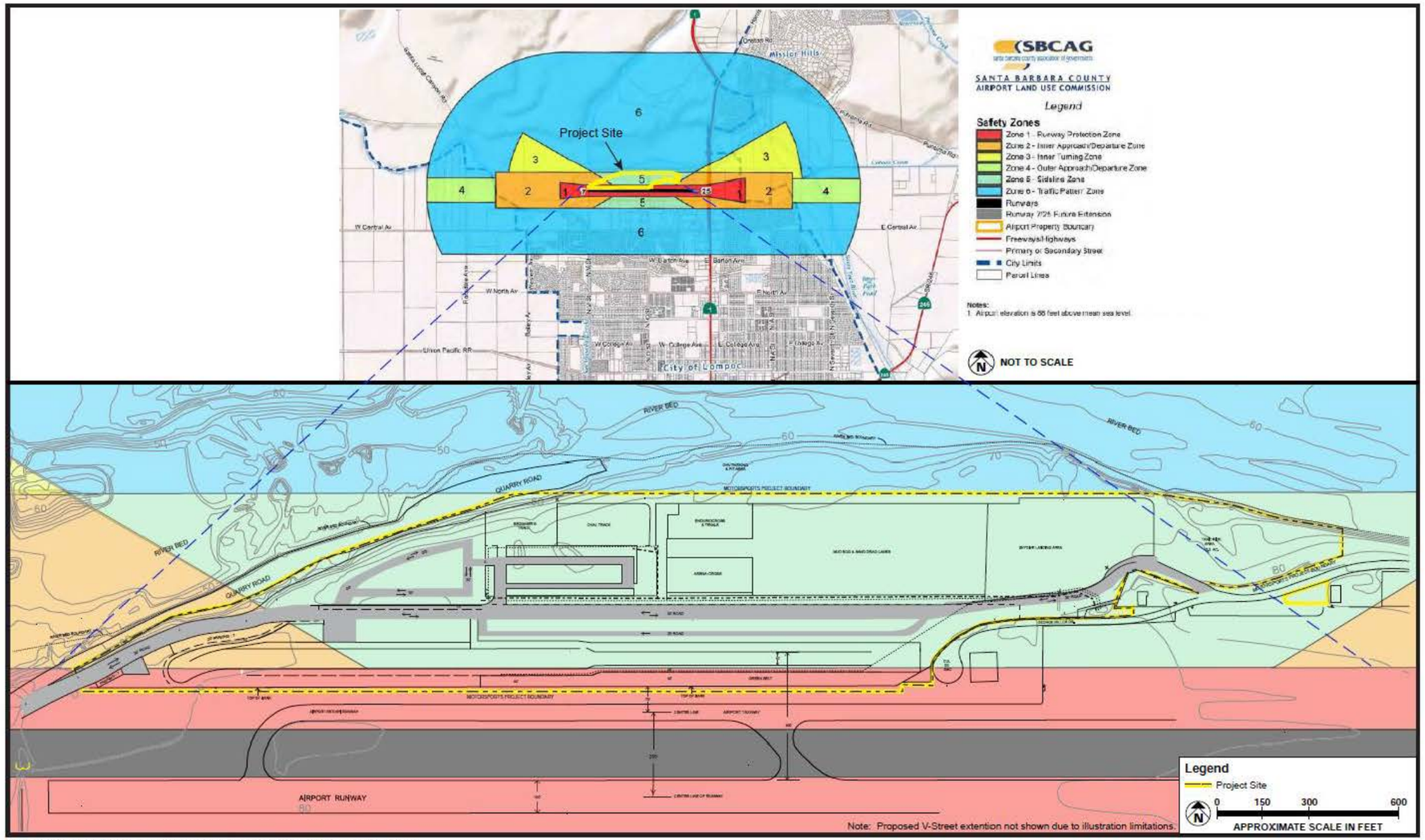


Sources: Lompoc Motorsports DEIR Figure 3.0-3, SB County Airport Land Use Plan

Attachment 2: Project Site with 1993 Airport Land Use Plan Safety Overlay



Attachment 3: Project Site Map with Draft ALUCP Safety Overlay



SOURCE: O'Brian and Wall - 2015; County of Santa Barbara, Airport Land Use Plan - 1993;

FIGURE 4.9-9

Attachment 2: Draft Santa Barbara County Airport Land Use Compatibility Plan – Rural Safety Compatibility Policies

Table III-5
Rural Safety Compatibility Policies

Land Use Types / Typical Uses Note: Multiple categories may apply to a land use action	**Safety Zone** 1	2	3	4	5	6	**Criteria for Conditionally Compatible (Yellow) Uses** (in addition to Maximum Nonresidential Intensity and Lot Coverage limits)
Maximum Nonresidential Intensity (People/Acre)	10	60	120	150	150	no limit	
Maximum Lot Coverage	0%	50%	60%	70%	70%	100%	
Residential Uses							
Residential, ,0, ≤4.0 d.u./acre	I	CC	C	C	CC	C	2, 5: Portions of parcel including accessory bldgs can be in Zone 2 or 5, but dwelling must be outside these zones
Residential, >4.0, ≤8.0 d.u./ acre	I	I	CC	CC	I	C	3, 4: If project site size ≥10 acres, buildings to be clustered to provide maximum open land
Residential, >8.0, ≤20.0 d.u./acre; Residential, >20.0 d.u/acre	I	I	I	I	I	C	
Assembly Facilities (≥50 people)							
Indoor Major Assembly Room (capacity ≥1,000 people): major sports arenas, concert halls	I	I	I	CC	I	CC	4, 6: Allowed only if site outside zone would not serve intended function
Outdoor Major Assembly Place (capacity ≥1,000 people): amphitheaters, stadiums, race tracks, fairgrounds, zoos	I	I	I	I	I	CC	6: Allowed only if site outside zone would not serve intended function
Indoor Large Assembly Room (capacity 300 to 999 people): sports arenas, theaters, auditoriums, assembly halls; Indoor Small Assembly Room (capacity 50 to 299 people): meeting rooms, dining halls, dance studios, places of worship	I	I	CC	CC	I	C	
Outdoor Large Assembly Space (capacity 300 to 999 people); Outdoor Small Assembly Space (capacity 50 to 299 people): community swimming pools, group camps	I	I	CC	CC	I	C	3, 4: Allowed only if site outside zone would not serve intended function
Office, Commercial, Service, and Lodging Uses							
Large Eating/Drinking Establishments in free-standing building (cap'y >300 people)	I	I	CC	CC	I	C	
Mid-Size Eating/Drinking Establishments in free-standing bldg (cap'y 50 to 299 people; Office Buildings: professional services, financial, civic)	I	CC	CC	CC	CC	C	
Small Eating/Drinking Establishments in free-standing building (capacity <50 people)	I	CC	C	C	C	C	2: Maximum bldg size ≤2,500 s.f.
Retail Shopping Centers with mixture of uses including restaurants	I	CC	CC	CC	CC	C	2: No rooms with capacity ≥50 people 3, 5: No rooms with cap'y ≥300 people
Hotels, Motels (except conference/ assembly facilities); Retail Stores, no Restaurants	I	CC	C	C	CC	C	
Low-Intensity or Outdoor-Oriented Retail or Wholesale Trade: furniture, automobiles, heavy eqpt, nurseries, lumber yards, boat yards; Misc. Service Uses: car washes, barbers, animal kennels, print shops	I	CC	C	C	C	C	

Table III-5 Continued

Rural Safety Compatibility Policies

Land Use Types / Typical Uses Note: Multiple categories may apply to a land use action	**Safety Zone**						**Criteria for Conditionally Compatible (Yellow) Uses** (in addition to Maximum Nonresidential Intensity and Lot Coverage limits)
	1	**2**	**3**	**4**	**5**	**6**	
Maximum Nonresidential Intensity (People/Acre)	10	60	120	150	150	no limit	
Maximum Lot Coverage	0%	50%	60%	70%	70%	100%	
Office, Commercial, Service, and Lodging Uses							
Bed & Breakfast Establishments; Low-Hazard Storage: mini-storage, greenhouses	I	C	C	C	C	C	
Industrial, Manufacturing, and Warehouse Uses							
Processing and Above-Ground Storage of Bulk Quantities of Highly Hazardous Materials (tank capacity >60,000 gallons): oil refineries, chemical plants	I	I	I	I	I	CC	6: Allowed only if site outside zone would not serve intended function
Manufacturing, Research & Development	I	CC	CC	CC	CC	C	
Industrial Outdoor Storage, except hazardous uses: public works yards, auto wrecking yards	CC	C	C	C	C	C	1: No structures; not in Object Free Area
Auto, Aircraft, Marine Repair Services; Distribution Facilities; Gas Stations and Repair Garages; Warehouses	I	C	C	C	C	C	
Educational and Institutional Uses							
Colleges and Universities	I	I	CC	CC	I	C	3, 4: Evaluate individual component uses
Children Schools, K – 12; Day Care Centers (>14 children)	I	I	CC	CC	I	C	3, 4: No new school sites or land acquisition; bldg replacement/expansion allowed for existing schools; no rooms with capacity ≥50 people
Family Day Care Homes (≤14 children)	I	I	CC	C	I	C	3: Allowed only in existing residential areas
Hospitals, Health Care Centers	I	I	CC	CC	I	C	3, 4: No new sites or land acquisition;
Congregate Care Facilities (>5 clients): nursing homes, assisted living facilities	I	I	CC	C	I	C	
Emergency Services Facilities: police stations (except jails), fire stations	I	I	CC	CC	CC	C	3 - 5: Allowed only if risks can be adequately mitigated
Inmate Facilities: prisons, reformatories, mental hospitals	I	I	CC	CC	I	C	3, 4: Allowed only if site outside zone would not serve intended function
Transportation, Communication, and Utilities							
Airport and Truck Terminals; Antenna Farms; Automobile Parking Structures; Small Transportation Hubs: bus stops; Wind Turbines	I	C	C	C	C	C	

Table III-5 Continued

Rural Safety Compatibility Policies

Land Use Types / Typical Uses	**Safety Zone**	**Criteria for Conditionally Compatible**

Note: Multiple categories may apply to a land use action	1	2	3	4	5	6	(Yellow) Uses (in addition to Maximum Nonresidential Intensity and Lot Coverage limits)
Maximum Nonresidential Intensity (People/Acre)	10	60	120	150	150	no limit	
Maximum Lot Coverage	0%	50%	60%	70%	70%	100%	
Transportation, Communication, and Utilities							
Electrical Substations; Transportation Terminals: rail, bus	I	CC	C	C	CC	C	2, 5: Allowed only if site outside zone would not serve intended function
Aircraft Storage; Automobile Parking Surface Lots; Public Transit Lines Railroads; Street, Highway Rights-of-Way;	CC	C	C	C	C	C	1: Not allowed in Object Free Area
Power Plants	I	I	CC	CC	I	CC	3, 6: Allowed only if site outside zone would not serve intended function
Agricultural Uses and Uses without Buildings							
Agricultural Buildings: barns, feed lots, stockyards, riding stables, picnic areas: Cemeteries (no places of assembly) and Memorial Parks; Marinas (no group activities); Sanitary Landfills; Sewage Treatment and Disposal Facilities; Wooded Areas: forests, tree farms, orchards;	I	C	C	C	C	C	
Lands with Low or Vegetation: brush lands, deserts, beaches, flood hazard areas, pasture, rangelands, field crops, grain crops, dry farming, vineyards; Non-Group Recreation: golf courses, tennis courts, parks, camp grounds	CC	C	C	C	C	C	1: Not allowed in Object Free Area
Water: rivers, creeks, canals, wetlands, bays, lakes, reservoirs	CC	C	C	C	C	C	1: Not allowed in Runway Safety Area
Large Group Recreation: team athletic fields	I	I	CC	C	I	C	3: Allowed only in existing residential areas
Shooting Ranges	I	I	C	C	I	C	

Legend

Land Use	Acceptability	Interpretation/Comments
I	*Incompatible*	Use should not be permitted under any circumstances
CC	*Conditionally Compatible*	Use is acceptable if indicated conditions are met
C	*Compatible*	Use is acceptable without safety-related conditions (noise, airspace protection, and/or overflight limitations may apply)
	** **Runway Safety Area** (RSA), **Object Free Area** (OFA): Dimensions are as established by FAA airport design standards for the runway.	

Attachment 3: California Airport Land Use Planning Handbook – Figure 4F: Safety Zone 5 Sideline Zone

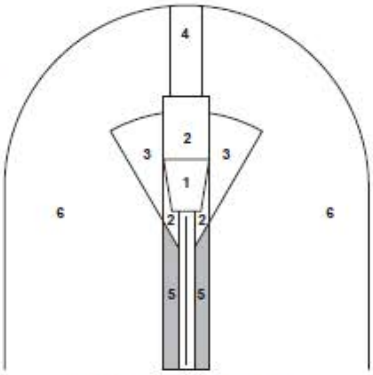
Nature of Risk

- Normal Maneuvers
  - Area not normally overflown; primary risk is with aircraft (especially twins) losing directional control on takeoff, excessive crosswind gusts or engine torque
- Altitude
  - Runway elevation
- Common accident types
  - Arrival and Departure: Aircraft losing directional control and veering off the side of the runway
- Risk Level
  - Low to moderate
  - Percentage of near-runway accidents in this zone: 3% - 5%

INITIAL LIFT-OFF OR LANDING TOUCHDOWN

Basic Compatibility Policies

- Normally Allow
  - Uses allowed in Zone 4 (subject to height limitations for airspace protection)
  - All common aviation-related activities provided that FAA height-limit criteria are met
- Limit
  - Nonresidential uses similarly to Zone 3
- Avoid
  - Residential uses unless airport related (noise usually also a factor)
  - High-intensity nonresidential uses
- Prohibit
  - Stadiums, group recreational uses
  - Children's schools, large daycare centers, hospitals, nursing homes



Refer to Chapter 3 for dimensions.

	Maximum Residential Densities	Maximum Nonresidential Intensities	Maximum Single Acre
	Average number of dwelling units per gross acre	Average number of people per gross acre	3x the Average number of people per gross acre
Rural	See Note A	50 – 70	150 – 210
Suburban	1 per 1 - 2 ac.	70 – 100	210 – 300
Urban	See Note B	100 – 150	300 – 450
Dense Urban	See Note B	See Note B	See Note B

Note A: Maintain current zoning if less than density criteria for suburban setting.
Note B: Allow infill at up the average of surrounding residential area.

FIGURE 4F

Safety Zone 5 – Sideline Zone

Letter No. 7: Peter Imhof, Deputy Executive Director, Planning, Santa Barbara County Association of Governments, August 12, 2016

Response 7-1

Please refer to Response 1-8 to the Caltrans Division of Aeronautics Comment Letter No. 1. Lompoc Airport is under the purview of the Santa Barbara County Airport Land Use Plan (ALUP) was adopted in 1993 and is the current, primary regulatory measure for the Lompoc Airport. The Santa Barbara

County Association of Governments (SBCAG) serve as the Airport Land Use Commission (ALUC). SBCAG, as the ALUC, provided advisory comments for the proposed Project and scope of the environmental review in relation to the adopted 1993 Airport Land Use Plan.

As noted in the Draft EIR Section 4.9, Land Use (see page 4.9-32), SBCAG, acting as the ALUC, has reviewed the proposed Project as part of the Notice of Preparation (NOP) process, and provided comments to the City in its letter of December 22, 2015. At that time, the SBCAG noted, because the proposed Project is only seeking a Conditional Use Permit (CUP), and only requires discretionary permit approval, and it does not involve a General Plan amendment or rezone, a determination of consistency by the ALUC would not be required.

Response 7-2

Comment noted. The commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 7-3

Comment noted. The commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 7-4

Comment noted and will be forwarded on to the decision makers.

Response 7-5

Comment noted and is an introductory comment.

Response 7-6

The City recognizes the role of the Santa Barbara County Association of Governments in airport-related compatible land use issues and acknowledges the ALUP should be used to address consistency of the proposed Project with the airport. According to the most recent ALUP and the draft plan currently being

prepared, the existing and future land uses associated with the proposed project around the airport are considered safe land uses.

The Draft EIR addresses concerns related to the placement of uses in the various safety zones identified by the comment in Topical Response No. 5, Land Use Compatibility, and Topical Response 1, Airport Safety.

Response 7-7

California Public Utilities Code Section 21659 reaffirms the above FAA guidance in stating (a) no person shall construct or alter any structure or permit any natural growth to grow at a height which exceeds the obstruction standards set forth in the regulations of the FAA relating to objects affecting navigable airspace contained in Title 14 of the Code of Federal Regulations, Part 77, Subpart C, unless a permit allowing the construction, alteration, or growth is issued by the department, and (b) the permit is not required if the FAA has determined that the construction, alteration, or growth does not constitute a hazard to air navigation or would not create an unsafe condition for air navigation. Subdivision (a) does not apply to a pole, pole line, distribution or transmission tower, or tower line or substation of a public utility.

The Draft EIR (Section 4.9, Land Use, on page 4.9-27) notes the proposed Project site is located within both the northern Transitional and Horizontal Surfaces of LPC as designated by FAR Part 77 (see Draft EIR Figure 4.9-5). The Draft EIR further notes the various FAA requirements within those zones (see pages 4.9-27 to 30) and the potential impacts the proposed Project may have regarding intrusions into airspace.

The Draft EIR identifies mitigation as follows to reduce the impacts that may result:

MM 4.9-1 Prior to the issuance of grading and building permits, the applicant shall:

- Restrict the height of the lighting standard including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface;

  or

- Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

The Applicant and City will comply with requirements of the FAA. That would include submission of any notices.

Please refer to Topical Response 1, Airport Safety, and Topical 5, Land Use Compatibility which further clarifies project consistency with the ALUP and FAA FAR Part 77.

Response 7-8

Please refer to the Draft EIR, Section 4.9, Land Use and Planning and Topical Response 5, both of which address the proposed Project's consistency with the ALUCP. Additionally, it should be noted, the Draft Airport Land Use Compatibility Plan (ALUCP) is currently in preparation; however, because it is only in draft mode and has not been officially adopted, regulatory compliance is not applicable. Therefore, for the purposes of this evaluation, the proposed Project falls under the jurisdiction of the existing ALUP's goals and policies.

Response 7-9

Please refer to Topical Response 1, Airport Safety, which addresses airport safety and project consistency with the Safety Area 1 and 3.

Response 7-10

The comment is noted.

Response 7-11

The Draft EIR (page 4.9-28) evaluated the proposed height restrictions in the clear zone. The current gravel road that extends from the existing terminus of V Street would undergo grading and alignment changes to facilitate access to the proposed Project site. Figure 4.9-8, Schematic of Approach/Departure Surface in the Draft EIR depicts existing and proposed elevations with regard to the Approach/Departure Surface from the western end of Runway 7/25. As proposed, the extension of V Street would extend into the Approach/Departure Surface of Runway 7/25.

As required under Part 77, the Approach/Departure Surface is subject to restrictions to ensure aircraft have adequate clearance areas for landing and takeoff. As noted, for the Lompoc Airport, the Approach/Departure Surface begins where the primary surface ends, 200 feet beyond the end of Runway 7/25. The proposed Project includes improving V Street and lowering it via grading such that its final grade would be approximately 7 feet 6 inches below existing Runway 7/25 elevation (88 feet amsl). At completion, the improved V Street would be approximately 7.5 feet below the base elevation of Runway 7/25, which would provide 12.5 feet of clearance from the road to the bottom of the 20:1 plane for the Approach/Departure Surface.

The Draft EIR notes FAR Part 77 requires a project be submitted to the FAA for review if it would penetrate a "notice surface" based on a slope of 100 feet horizontal to 1-foot vertical from the nearest point of the nearest runway. Further, the Approach/Departure Surface does not permit any intrusions of any type into the area above the 20:1 planar surface, including potential “obstruction evaluation” (OE). As required under Part 77, the Approach/Departure Surface is subject to restrictions to ensure aircraft have adequate clearance areas for landing and takeoff.

The Draft EIR (page 4.9-28) indicates the FAA would most likely restrict the use the portion of V Street that is located in the area beneath the Approach/Departure Surface to vehicles that are less than 12.5 feet tall (including antennas, roof racks and roof top carriers). That includes a planar surface starting at 200 from the end of the runway then extending beyond the runway up and out at a slope of 20:1 from its base elevation until it reaches an elevation 150 above the base elevation.

As the proposed Project includes utilizing V Street for access to the proposed Project site, the Draft EIR (page 4.9-28) noted it would be required to meet any restrictions imposed by FAA, including height limits. As the proposed Project has the potential to intrude into these safety zones, the Draft EIR determined it would result in a significant impact.

The Draft EIR identifies the following mitigation measures to address impacts associated with uses from the proposed project penetrating the Transitional and Approach/Departure Zones:

MM 4.9-1 Prior to the issuance of grading and building permits, the applicant shall:

- Restrict the height of the lighting standard including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface; or
- Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

MM 4.9-2 Prior to the completion of the V Street extension, the project applicant shall construct a height-restricting barrier over the entry-way to the proposed Project site’s access point on “V” Street and the Approach/Departure Surface, such that it restricts access to vehicles more than 12 and 1/2 feet including antennas, roof racks and roof top carriers.

As a secondary option to the height-restricting barrier, the proposed Project applicant shall lower the V Street access elevation to 17.5 feet below the existing elevation of the Approach/Departure Surface such that vehicles less than 22.5 feet including antennas, roof racks and roof top carriers will not penetrate the Approach/Departure Surface.

Please refer to Topical Response No 1, Airport Safety and Topical Response No. 5, Land Use Compatibility for additional clarification.

Response 7-12

Please refer to Response 7-11; Topical Response 1, Airport Safety, which also addresses Project site access; and Topical Response 5 Land Use Compatibility regarding ALUP.

Response 7-13

If the City approves the proposed Project and adopts the mitigation measures, then the City would be responsible for assuring the measures are completed as required by the CEQA Guidelines Section 15097 as noted below:

- In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.
- The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure.

Access along V Street would be limited according to **Mitigation Measures MM 4.9-1** and **MM 4.9-2** would address height limitation for structures and vehicles, and which are provided as follows:

4.9-1 Prior to the issuance of building a grading permits the site developer shall:

- Restrict the height of the lighting standard including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface;
- or
- Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

4.9-2 Prior to the use of V Street access way, the developer shall construct a height-restricting barrier over the entry-way to the proposed Project site's access point on "V" Street and the Approach/Departure Surface are such that it restricts access to vehicles to more than 12 and 1/2 feet including antennas, roof racks and roof top carriers.

As a secondary option to the height-restricting barrier, the Project applicant shall lower the V Street access elevation to 15.5 feet below the existing elevation of the Approach/Departure Surface such that vehicles less than 22.5 feet including antennas, roof racks, and roof top carriers will not penetrate the Approach/Departure Surface.

Response 7-14

Section 4.9, Land Use, of the Draft EIR provides analysis of the various land use plans that are applicable to the proposed Project. The Draft ALUCP has not yet been adopted; therefore, the proposed Project is not required to comply with the proposed safety requirements. Even if the Draft ALUCP were to be adopted, State law authorizes the City Council to override any regulation in the ALUCP that may be inconsistent with the City's General Plan, with which the proposed Project is consistent. Impacts would be less than significant with the existing ALUP.

Please refer to Topical Response No. 1, Airport Safety, which addresses concerns about the Airport's designated Safety Zones and the allotted distance between the recreational park—specifically the grandstands—and the landing/takeoff area.

The OHV areas total approximately 18.4 acres in size (see Section 5.0 of the Draft EIR for disturbance area) and the Drag Strip area totals approximately 9.1 acres. The remaining 10.5 acres include parking, roadways, and pedestrian access that is shared between both uses. For OHV only events, the areas utilized would be the parking areas and OHV areas for a total of 28.9 acres with up to 2,580 persons. Thus, the people per acre would be approximately 89 people per acre, below the 250 people per acre noted in the comment. The 1993 Airport Land Use Plan[3] indicates, "large concentrations is a purposely vague term as the issue will vary with the land use and location. For general purposes, the threshold for review is roughly 25 persons per acre for on-residential uses or more than four units per acre on residential land." It should be clarified the policy refers to residential uses.

Response 7-15

Please refer to Response 7-14. Also, as stated in the Project Description of the Draft EIR, the second park area to be developed would include an International Hot Rod Association (IHRA)-sanctioned one-eighth-mile drag strip with grandstands and pit areas. Please refer to Figure 3.0-5, Conceptual Drag Strip, Pits, and Parking which demonstrates the proposed drag strip layout and dimensions. Also, as presented in the Draft EIR, Section 5, Alternatives Analysis, the Drag Strip Only Alternative, 9.1 acres of the 38-acre proposed Project site would be developed for the drag strip area. The Drag Strip only events would utilize the parking areas and drag strip areas for a total of 19.6 acres with up to 2,640 persons. Thus, the people per acre would be approximately 135 people per acre, below the 250 people per acre noted in the comment.

3 Santa Barbara County Association of Governments, *Santa Barbara County Airport Land Use Plan*, Chapter 5, Airport Safety Policy, (1993) page 7.

Response 7-16

Please refer to Topical Response No. 1, Airport Safety, and also refer to the Draft EIR, Section 4.9, Land Use and Planning for safety analysis. Because the Project is subject to a conditional use permit by the City, the City can impose additional restrictions on attendance.

Response 7-17

Please refer to Responses 7-11, 7-12, and 7-13.

Response 7-18

Please refer to the Topical Response No. 1, Airport Safety, and the Draft EIR, Section 4.9, Land Use and Planning and Topical Response No 5, both of which address project consistency with the ALUCP. Additionally, it should be noted, the Draft Airport Land Use Compatibility Plan (ALUCP) is currently in preparation; however, because it is only in draft mode and has not been officially adopted, regulatory compliance is not applicable. Therefore, for the purposes of this evaluation, the proposed Project falls under the jurisdiction of the existing ALUP's goals and policies.

Please refer to Response 7-14 and 7-15. As indicated in these response, the people per acre would total 89 for OHV events and 135 for Drag Strip events which is below the draft ALUCP intensity of 150 people per acre. The worst case scenario would include 2,700 persons for the OHV—Saturday nonevent Open Riding/No Racing and Drag Strip—Specialty Drag Race event within the 38-acre proposed Project site. This would equate to approximately 71 persons per acre.

Response 7-19

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 7-20

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Please refer to Responses in Comment Letter 1 from the Caltrans Division of Aeronautics.

Further, please refer to Topical Response 1, Airport Safety and Topical Response 5, Land Use Compatibility, which states that FAR Part 77 requires a project be submitted to the FAA for review if it would penetrate a "notice surface" based on a slope of 100 feet horizontal to 1-foot vertical from the nearest point of the nearest runway. Further, the Approach/Departure Surface does not permit any intrusions of any type into

the area above the 20:1 planar surface, including potential "obstruction evaluation" (OE). As required under Part 77, the Approach/Departure Surface is subject to restrictions to ensure aircraft have adequate clearance areas for landing and takeoff.

Response 7-21

The attached documents have been reviewed and considered.

Our Vision Clean Air

Santa Barbara County
Air Pollution Control District

RECEIVED

AUG 15 2016

Planning Division

August 15, 2016

Lucille Breese
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93438

Re: APCD Comments on the Draft Environmental Impact Report for the Lompoc Motorsports Project, SCH No. 2015121005

Dear Ms. Breese:

The Air Pollution Control District (APCD) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the Lompoc Motorsports Project. The project includes the development and operation of a recreational motorsports facility on approximately 38 acres of land. The facility consists of an Off-Highway Vehicle (OHV) area, a drag strip, grandstands, a parking area, and other associated structures. The proposed project will involve air quality, greenhouse gas, and public health impacts.

The APCD has reviewed the Draft EIR prepared for the project in its role as a commenting agency under the California Environmental Quality Act (CEQA). Our review supports our mission of protecting the people and environment of Santa Barbara County from the effects of air pollution. We appreciated the opportunity to meet with City staff on August 8, 2016 to review our comments.

To assist the City of Lompoc in preparation of the EIR, we have summarized below our general comments on the Draft EIR, and attached detailed comments. Overall, it was difficult to assess whether the air quality, greenhouse gas, and public health impacts have been adequately analyzed. The EIR contains insufficient or unclear information regarding methods, analysis, and conclusions. Because of this, we are unable to understand and review impacts from the project, and the CEQA document does not fulfill the purpose to inform the public agency, decision makers and the general public of the project's potential environmental impacts. In sum, the EIR's impact analysis does not adequately disclose, assess, and mitigate the project's air quality, greenhouse gas, and health impacts. 8-1

Our review identified the following primary issues with the analysis in the Draft EIR:

- **Disclosure/verification:** It was difficult to match the emission totals presented in the main document to the calculations in the appendices. We were unable to tell if all the elements of the project were accurately analyzed in the emissions calculations, and so it is unclear whether the emissions totals presented are correct. 8-2

- **Significance thresholds and determinations of significance:** The document presents unclear, and at times conflicting, air quality significance criteria and significance determinations (classification of impacts). In addition, not all significance criteria have been evaluated and/or properly evaluated (e.g., cause or contribute to a violation of an air quality standard, expose sensitive receptors to significant pollutant concentrations). In addition, the greenhouse gas thresholds utilized may not be appropriate for the project type. Determinations of significance must be supported by substantial evidence. 8-3

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- **Emission totals:** Not all project emissions sources have been quantified and compared to the applicable significance criteria. It is unclear what sources currently comprise the emission totals. In addition, unmitigated and mitigated emission estimates should be disclosed in Section 4.2 and Section 4.6. 8-4

- **Air quality impacts**: The modeling results for the OHV area events showed potential particulate matter (PM_{10}) impacts over twice the federal 24-hour standard, and the modeling results for the drag strip events showed potential particulate matter (PM_{10}) impacts almost equal to the federal 24-hour standard.[1] Again, we were unable to independently verify these results, but if they are correct they are significant impacts and could impact the region's ability to attain federal ambient air quality standards. An Air Quality Impact Analysis should be performed to determine if the proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. 8-5

- **Health risk**: It appears the document only attempts to analyze non-cancer risk from the project. Cancer risk, chronic and acute non-cancer risk should be analyzed with a refined Health Risk Assessment (HRA) in accordance with the *District Modeling Guidelines for Health Risk Assessments*, Form-15i, dated August 2015. 8-6

- **Mitigation measures:** To ensure that the measures are effective and enforceable, proposed mitigation measures should be made conditions of approval for the project and adopted as part of a mitigation monitoring and reporting program. While the analysis lists mitigation measures and presents modeled mitigation emission results, it is not clear how the efficiency of the mitigation measures were determined or how the modeled emission results were calculated, therefore we are unable to comment on whether these measures would reduce the impacts to less than significant. Substantial evidence is needed to support the analysis and conclusions. 8-7

Detailed comments are attached in **Attachment 1.**

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8890 or via email at BarhamC@sbcapcd.org.

Sincerely,

Carly Barham

Carly Barham,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Meridian Consultants c/o Joe Gibson and Chris Hampson
Michael Goldman, Manager, APCD Engineering Division
Kaitlin McNally, Manager, APCD Compliance Division
TEA Chron File

[1] Appendix 4.2, sheet titled "*Lompoc Motorsports Concentration Summary*".

Attachment 1

Detailed APCD Comments on the Draft Environmental Impact Report for the Lompoc Motorsports Project (SCH No. 2015121005)

Project description:

The project includes the development and operation of a recreational motorsports facility on approximately 38 acres of land. The project involves the phased development of the site as two primary park areas. The first park area consists an Off-Highway Vehicle (OHV) area that includes: relocation of an existing Kids Motor Fun Park; a one-quarter (¼) mile oval dirt track; a 7-acre multi-track OHV area; and a 2.3 acre, low-speed trail-riding area open to motorcycles, all-terrain vehicles (ATVs), and mountain bikes. The second park area consists of an International Hot Rod Association (IHRA) sanctioned one-eighth (⅛) mile drag strip that would have grandstands and pit areas. Other construction associated with the project includes a centralized parking area, storage lockers, a maintenance and storage building, lighting, signage, and other accessory buildings. The project site, identified in the Assessor Parcel Map Book as APN 093-450-012, -013, and 093-040-020, is located on a 38-acre site on the northern end of the City of Lompoc Airport in the City of Lompoc.

Operation of the project would provide for a variety of drag strip, OHV, and non-racing events. The project includes the following details:

- The maximum number of vehicle and persons onsite = 234 vehicles, 627 persons for a weekday event; and 1,160 vehicles, 2,700 persons for a weekend event.
- Proposed parking would accommodate approximately 1,120 spaces. The proposed grandstands would seat approximately 1,250 spectators.
- Portable lights would be used to light the OHV area. Each portable light would be powered by a 10.5-horsepower diesel generator.
- Grading includes 45,185 cubic yards of soil to be balanced onsite.
- One to four underground tanks that are remnants of a 1970s business would be removed.
- Gasoline, diesel, and alcohol fuels would be allowed onsite in limited quantities. Nitrous oxide gas would be permitted. Nitro methane and exotic fuels would not be allowed. Onsite equipment would be fueled via truck-mounted tanks.

APCD staff has the following comments after review of the DEIR:

1. **General Comment:** The EIR has numerous discrepancies and contradictions, including contradictory conclusions regarding impact classifications and contradictory descriptions of methodology. Clear and consistent determinations of significance supported by substantial evidence are needed. 8-8

2. **General Comment:** The maximum number of parking spaces/vehicles allowed onsite on any one day should be an enforceable condition of approval by the lead agency to ensure that parking demand and trip generation stay within the amounts analyzed in the traffic study and EIR. 8-9

3. **Section 3.0 Project Description, Parking, Page 3.0-8:** 8-10

    a. Define the number of overnight RV parking spaces.

b. Define the maximum number of vehicles that could be parked onsite with vehicle type noted.

4. **Section 3.0 Project Description, Lighting, Page 3.0-10:** Identify the number of proposed diesel generators powering the portable lights.

5. **Section 3.0 Project Description, Operational Characteristics, Page 3.0-26:** State the maximum number of vehicles and persons onsite for weekend event. 8-10

6. **Section 3.0 Project Description, Operational Characteristics, Page 3.0-26-30:** Identify which events listed in Table 3.0-1 and Table 3.0-2 comprise the event scenarios for a two-day weekend event. In addition, please explain how the total number of people and vehicles (broken down by type) that are at the facility for each event scenario can be determined from the information presented in the tables.

7. **Section 4.2 Air Quality, Table 4.2-1, Page 4.2-4:** Please update this table to reflect the current federal primary ozone standard of 0.070 ppm on an 8-hour basis. 8-11

8. **Section 4.2 Air Quality, Table 4.2-1, Page 4.2-6:** For clarification purposes, the APCD considers "stationary sources" as sources that may require permits from the APCD, such as gas stations, auto body shops, diesel generators, boilers and large water heaters, dry cleaners, oil and gas production and processing facilities, and water treatment facilities. Other stationary sources such as residential heating and cooling equipment, wood burning stoves and fireplaces, or other individual appliances do not require permits from the APCD and are known as "area sources." The CalEEMod computer program may be used to estimate unmitigated and mitigated "mobile source" and "area source" impacts, while "stationary source" emissions require a project-specific, equipment-specific off-model calculation. Stationary source and area source emissions must be added to transportation source (mobile source) emissions prior to applying the project-specific thresholds of significance. Total long-term operational emissions from a project can consist of mobile sources, area sources, and stationary sources. 8-12

9. **Section 4.2 Air Quality, Page 4.2-7:** The APCD's *Modeling Guidelines for Health Risk Assessments* (Form-15i) recommend that sensitive receptors be defined as schools, daycare facilities, hospitals, and care facilities. Risk should be assessed at all sensitive receptors within 2 km of the proposed site. 8-13

10. **Section 4.2 Air Quality, ENVIRONMENTAL IMPACTS, Page 4.2-15-29:** The EIR has not properly evaluated the following thresholds of significance being applied to the project:

    - *Threshold 4.2-1: Conflict with or obstruct implementation of the applicable air quality plan?*
    - *Threshold 4.2-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*
    - *Threshold 4.2-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*
    - *Threshold 4.2-4: Expose sensitive receptors to substantial pollutant concentrations?*

8-14

In order to properly evaluate the significance criteria, the following actions should be taken:

- ***Threshold 4.2-1:*** The results from the analyses below should be used to inform whether the proposed project conflicts with or obstructs the implementation of the applicable air quality plan (the 2013 Clean Air Plan). 8-15

- ***Threshold 4.2-2:*** An **Air Quality Impact Analysis** should be performed to determine if the proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. All pollutants with an ambient air quality standard should be evaluated. See also Comment 21. 8-16
    - We recommend that AERMOD be used to perform air dispersion modeling for this project, both to analyze ambient air quality impacts and to use in the health risk assessment. The dispersion modeling should follow the procedures described in the District's *Modeling Guidelines for Health Risk Assessments*, Form-15i, dated August 2015 or later.
    - Provide the electronic files listed in Section 4 (page 25-26) of the *Modeling Guidelines* so that the results of the modeling can be independently verified.

- ***Threshold 4.2-3:*** Project emissions should be fully quantified and properly compared to the APCD adopted criteria for determining the level of significance for project-specific and cumulative impacts. 8-17
    - We recommend that the discussion in Section 4.2 be expanded to more clearly describe how emissions were calculated, especially for the more unique parts of this project such as the drag strip and OHV area. We also recommend that Tables 4.2-8 and 4.2-9 be expanded to include individual line items for the different emission sources. This will show how the total emissions were calculated.
    - Especially for competition vehicles without catalysts, appropriate emission factors should be identified and used, with the basis for these factors documented.

- ***Threshold 4.2-4:*** A **refined Health Risk Assessment (HRA)** should be performed in accordance with the District *Modeling Guidelines for Health Risk Assessments*, Form-15i, dated August 2015 or later, to determine if the proposed project will expose sensitive receptors to substantial pollutant concentrations. See also Comment 17. 8-18

11. **Section 4.2 Air Quality, Thresholds of Significance, Page 4.2-15-18:** It is unclear which thresholds of significance are being applied to the proposed project. It appears that the EIR is relying on the APCD adopted criteria, as stated on page 4.2-15. The EIR should use the APCD Board-adopted thresholds of significance as follows:

    A proposed project will not have a significant impact on air quality, either individually or cumulatively, if the operation of the project will: 8-19

    - emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule, for any pollutant (i.e., 240 pounds/day for ROC, NO_X, or SO_X; and 80 lbs/day for PM_{10}. There is no daily operational threshold for CO; it is an attainment pollutant); and

- emit less than 25 pounds per day of NO_x or ROC from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one (1.0) for non-cancer risk); and
- be consistent with the latest adopted federal and state air quality plans for Santa Barbara County.

8-19

12. **Section 4.2 Air Quality, Thresholds of Significance, Regional Air Quality Thresholds, Page 4.2-16:** This page states that, *"The proposed Project would result in a potentially significant impact if it would emit more than 25 pounds per day of NOx or VOC from motor vehicle trips only."* The other criteria listed in Comment 11 above are not discussed. Is this the only significance criteria being applied to the project? Please explain.

8-20

13. **Section 4.2 Air Quality, Thresholds of Significance, Criteria Air Pollutants, Page 4.2-16-17:** This page states that, *"In consultation with the SBAPCD* [sic], *the following thresholds for each criteria pollutant for operations of the proposed Project are utilized for analysis and are identified in Table 4.2-7, Air Quality Increment Change Criteria..."*

    The APCD recommends applying the Board-adopted thresholds of significance described in Comment 11. **Note that air quality increments are not APCD Board-adopted CEQA significance thresholds, and are not intended to be used as such.**

8-21

14. **Section 4.2 Air Quality, Thresholds of Significance, Toxic Air Contaminants, Page 4.2-17:** This page states that, *"Carcinogenic compounds are not considered to have threshold levels (i.e. dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. As a result, SBCAPCD identifies a potentially significant impact to public health if the health risk exceeds a Hazard Index of more than one (1.0) for non-cancer risk."*

    The APCD has adopted health risk thresholds for both cancer and noncancer risk (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one (1.0) for non-cancer risk). **The EIR has only attempted to evaluate noncancer risk. Cancer risk and noncancer risk (acute and chronic risk) should be assessed and compared to the threshold of significance.**

8-22

15. **Section 4.2 Air Quality, Methodology, Operation, Page 4.2-19-21:** It is difficult to determine which sources were included in the operational emission estimates, which scenarios were used to determine maximum emissions, and what methods were used to calculate emissions for the various sources. Worksheets in Appendix 4.2 present calculations for drag strip and OHV emissions, but the assumptions, emission factors, and methodology are not explained. Without a clear explanation of methodology and the information presented in Appendix 4.2, the APCD cannot confirm quantification of all project sources and the accuracy of such quantification.

    The discussion of methodology should clearly articulate if the emission sources and activities described below have been quantified, and if not, the discussion and analysis should be revised to do so:

    a. Mobile (Motor Vehicle) Emissions:

8-23

Exhaust Emissions:

Motor vehicles associated with the project produce exhaust emissions, consisting of criteria pollutants and toxic air contaminants. Project mobile sources have various types of vehicles and activities constituting mobile source emissions. There are both on-site and off-site vehicle emissions. Exhaust emissions from onsite and offsite mobile sources will be generated from spectator vehicle trips to the site, employee vehicle trips to the site, participant vehicle trips to the site, and participant and spectator vehicle activities onsite, including race cars. Total criteria pollutant emissions from these activities should be quantified. 8-23

Particulate Matter Emissions:

Motor vehicles on the project site will generate particulate matter. Fugitive dust will be generated from spectator and employee vehicles driving on paved and unpaved parking areas, and from participant vehicles and race cars in the park areas. Particulate matter emissions will be generated by the racing events conducted on the dirt oval track, and by tire wear during race events conducted on paved surfaces, especially drag racing events. Total emissions of fugitive PM_{10} and $PM_{2.5}$ from these activities should be quantified.

b. Stationary and Area Sources:

Total operational emissions associated with the project include any emission sources not considered "mobile emissions". This would include emissions from stationary and area sources.

It appears that area sources have been quantified using the CalEEMod program. Emissions from stationary equipment (e.g. diesel engines, boilers) need quantification; specifically, emission from generators associated with RVs and portable lights.

Generators associated with RVs:

It can reasonably be assumed that RVs would run a generator set during their stay. Therefore, emissions resulting from generator sets from visiting RVs must be estimated and included in the project's total operational emissions. The analysis should provide assumptions for the number of RVs operating a generator, hours of generator operation per day, and fuel type for the generator (e.g. grid power, diesel, propane, etc.). Operation of this equipment should also be included in the Health Risk Assessment and Air Quality Impact Analysis as needed. 8-24

Generators associated with Portable Lights:

As described in *Section 3.0 Project Description*, portable lights powered by diesel generator engines will be utilized. As requested in Comment 4, please define the number of engines operating onsite. Emissions resulting from operation of these engines should be estimated and included in the project's total operational emissions,

and should also be included in the Health Risk Assessment and Air Quality Impact Analysis.

We recommend that the methodology discussion be expanded to more clearly describe how emissions were calculated, especially for the more unique parts of this project such as the drag strip and OHV area. **The air quality analysis should be based on a "worst-case" day.** 8-24

16. **Section 4.2 Air Quality, Methodology, Dispersion Modeling, Page 4.2-20:** 8-25

    a. Air dispersion modeling is conducted to demonstrate compliance against the NAAQS and CAAQS (see Comment 10, 13 and 21).

    b. If EMFAC is utilized, please utilize EMFAC2014, released in December 2014.

17. **Section 4.2 Air Quality, Methodology, Toxic Air Containments [sic], Page 4.2-21:**

    a. The heading should read Toxic Air Contaminants.

    b. The methodology used to perform the Health Risk Assessment (HRA) is unclear based on the information provided. **HRAs must be performed using the Hotspots Analysis and Reporting Program, Version 2 (HARP 2).** The cancer risks and chronic and acute non-cancer risks should be presented at the point of maximum impact, the maximally exposed individual resident and the maximally exposed individual worker. Additionally, input and output files from HARP 2 should be provided to show the parameters used to model the estimated health impacts from this project. 8-26

    In order to properly assess health risk to the public, a refined Health Risk Assessment (HRA) should be performed in accordance with the District Modeling Guidelines for Health Risk Assessments, Form-15i, dated August 2015 or later, available at www.ourair.org/wp-content/uploads/apcd-15i.pdf. The refined HRA is required to demonstrate that the operation of project-related equipment does not cause a significant risk to the surrounding community. Please contact Michael Goldman, Manager of the District's Engineering Division, at GoldmanM@sbcapcd.org or (805) 961-8821 with any questions on performing the refined health risk assessment.

18. **Section 4.2 Air Quality, Project Design Features, Page 4.2-22:** The "Project Design Features (PDF)" described and the effect of the features on the analysis appear to be more accurately and appropriately labeled as mitigation measures (see *Trisha Lee Lotus (LOTUS) et al. v Department of Transportation et al.* (223 Cal. App.4th 645). The project design features are not a true component of the project plan or design, rather they are a mitigating action that is separate from the project itself, and responsive to the project's impacts. Where features or measures are relied upon to reduce, minimize, avoid, or rectify impacts, those measures are not part of the project, they are mitigation measures designed to reduce or eliminate impacts and must be adopted as such. 8-27

19. **Section 4.2 Air Quality, Project Impacts, Pages 4.2-22-28:** We recommend that the "Project Impacts" section be reorganized as it appears that, **at times, the discussion and evaluation of impacts does not match the threshold being applied**. Specifically, 8-28

a. **Threshold 4.2-2** should discuss and present the results of the AQIA;

b. The discussion of the project's construction and operational emissions, and the totals presented in Table 4.2-8 and Table 4.2-9, should be discussed under **Threshold 4.2-3**; 8-28

c. **Threshold 4.2-4** should discuss and present of the results of the HRA.

20. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-1, Page 4.2-22-24:** In the discussion of Threshold 4.2-1, page 4.2-23 states that, "*Temporary emissions associated with construction of the proposed Project would not exceed any of the criteria pollutant SBCAPCD thresholds for regional emissions, as indicated in Table 4.2-8 and Table 4.2-9. Therefore, the proposed Project's construction and operation related emissions would be consistent with the CAP.*"

    a. Construction emissions are shown in Table 4.2-8, while Table 4.2-9 shows operational emissions. The first sentence should be revised to delete reference to Table 4.2-9 as the subject of the sentence is construction emissions. 8-29

    b. As stated on page 4.2-16, the APCD does not have quantitative thresholds of significance in place for short-term or construction emissions.

    c. The second sentence appears to imply that the project's operational emissions would not exceed any of the APCD thresholds, and therefore emissions would be consistent with the CAP. However, Table 4.2-9 shows that mobile ROC and NO_X emissions would exceed APCD criteria pollutant thresholds. Therefore, the EIR should consider the accuracy of the conclusionary statement.

21. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-2, Page 4.2-24-26:** This threshold evaluates whether the project emissions would violate any air quality standard or contribute substantially to an existing or projected air quality violation. As indicated in Appendix 4.2 "*Lompoc Motorsports Concentration Summary*", the modeling results for the OHV area events show potential particulate matter (PM_{10}) impacts over twice the federal 24-hour standard, and the modeling results for the drag strip events show potential particulate matter impacts (PM_{10}) almost equal to the federal 24-hour standard.

    Due to the project's potential to cause or contribute to a violation of an air quality standard, the project must analyze if emissions will violate any air quality standard or contribute substantially to an existing or projected air quality violation. In order to conduct this evaluation, an Air Quality Impact Analysis (AQIA) should be performed pursuant to APCD's Rule 805 (i.e. consistent with the requirements provided in the most recent *Guidelines on Air Quality Models* prepared by the Environmental Protection Agency, Appendix W to 40 CFR Part 51). The results of the AQIA will inform the significance determination for this impact. 8-30

    Modeling should evaluate the following criteria pollutants: SO_2, $PM_{2.5}$, PM_{10}, NO_2, and CO. Lead emissions may also warrant modeling as some of the sources may be using fuels containing lead.

    The results of the AQIA should be compared to the Air Quality Standards in the right hand column of Table 3 in Rule 803 (see www.ourair.org/wp-content/uploads/rule803.pdf). Please be aware that APCD is scheduled to adopt proposed changes to Regulation VIII in August 2016 that

revise rule numbers, standards and increments (see www.ourair.org/rules-under-development/). Proposed Rule 805, Table 1 includes the revised values. 8-30

22. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-2, Construction Emissions, Page 4.2-24-25 and Threshold 4.2-2, Operational Emissions, Page 4.2-25-26:**

    a. See Comment 18 regarding the Project Design Features (PDFs).

    b. The EIR should disclose the project's impact before project design features/mitigation measures have been applied. **Please present both unmitigated and mitigated construction emissions estimates, and unmitigated and mitigated operational emissions estimates.** 8-31

23. **Section 4.2 Air Quality, Project Impacts, Table 4.2-9 Operational Emissions, Page 4.2-25:**

    a. The APCD has adopted thresholds for Reactive Organic Compounds (ROCs), not Volatile Organic Compounds (VOCs). Please refer to ROCs in this analysis.

    b. The operational emission estimates provided in Table 4.2-9 match the emission estimates from the CalEEMod winter report, meaning that the project's operational emission estimates only include emissions from vehicle trips to the project and area sources.

    Importantly, emissions from race vehicles do not appear to be quantified and compared to the CEQA thresholds of significance. Only emissions from highly controlled (mainly passenger) vehicles have been quantified, while emissions from race vehicles with uncontrolled (open) exhaust emissions have not been.

    Therefore, it appears that the EIR has not quantified all project emission sources and properly compared emissions to the appropriate thresholds of significance. 8-32

    Operational emissions from the following sources require quantification:

    - Exhaust emissions from onsite and offsite mobile sources, including emissions from race car vehicles, participant vehicles, employee vehicles, and spectator vehicles;
    - Particulate matter/fugitive dust emissions from travel on paved and unpaved roads, and activities in the park area including race events on paved and unpaved surfaces;
    - Operation of stationary sources, including (but not limited to) diesel generators powering the portable light system, and generator sets powering onsite RV visitors/campers.

    Note that when quantifying onsite vehicle emissions, all engine use on the project should be estimated. Meaning that not only the time the vehicles run in a race, but the time the vehicle is run in the pit and moving around on the site.

Once all emission sources are quantified, revised emission estimates can be compared to the appropriate CEQA thresholds of significance and determinations of significance can be made. Specifically, onsite and offsite motor vehicle emissions should be compared to the 25 pounds/day threshold for NO_X and ROC, and any emissions from stationary and area sources should be added to the mobile source total of NO_X, SO_X, ROC, and PM_{10} and compared to the total operational emissions thresholds of 240 pounds/day of NO_X, SO_X, and ROC, and 80 pounds/day of PM_{10}. Emission estimates will likely change substantially with the accounting of emissions from these vehicles/activities into the operational emission estimates. 8-32

c. Please provide a more refined breakdown of project emissions by source, instead of generally defining as "Maximum" and "Maximum Mobile".

24. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-2, *Toxic Air Contaminants*, Page 4.2-26:**

a. See Comment 14. 8-33

b. The discussion of impacts from toxic air contaminants seems most appropriate for the evaluation of Threshold 4.2-4 on page 4.2-27, rather than its current placement.

25. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-3, Page 4.2-27:** This page states that, "*As shown in Table 4.2-8, all stationary emissions associated with the proposed Project would not exceed the SBCAPCD-recommended thresholds and would, therefore, not result in a cumulatively considerable net increase of any criteria pollutant. As such, stationary impacts would be less than significant.*" Notwithstanding this conclusion, the text then goes on to state that, "*The proposed Project would exceed the daily mobile emission thresholds for VOC and NOx of 25 pounds per day…Impacts would be potentially significant as SBAPCD [sic] daily mobile thresholds for NOx and VOC are exceeded.*"

a. Table 4.2-8 shows estimated construction emissions, not operational emissions. Table 4.2-9 does indicate that project emissions would exceed APCD thresholds. 8-34

b. The proposed project emissions consist of mobile source, area source, and stationary source emissions. Total emissions from the project should be compared to the APCD New Source Review thresholds. Emissions of NO_X and ROC from motor vehicle trips only should be compared to the threshold of 25 pounds per day.

c. Due to the county's nonattainment status for ozone and PM_{10}, if a project's air pollutant emissions of either of the ozone precursors (NO_X or ROC) or PM_{10} exceed the long-term operational thresholds, then the project's would result in a cumulatively considerable net increase in emissions. As shown in Table 4.2-9, emissions from the operation of the project would exceed APCD-recommended mobile only operational thresholds of significance; therefore, the project would result in a cumulatively considerable net increase in emissions.

26. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-4, Page 4.2-27:** The text states that, "*As shown in Table 4.2-7 and Table 4.2-8, criteria pollutants would not exceed SBCAPCD thresholds. Furthermore, the proposed Project would not expose sensitive populations to toxic air* 8-35

contaminants which exceed State or SBCAPCD thresholds. Therefore, impacts would be less than significant."

The current evaluation of health risk is insufficient for assessing potential health risk from the proposed project. The EIR should be revised to incorporate the results of a refined HRA, compare results to health risk thresholds for both cancer and noncaner risk, and disclose if project-related equipment will result in a significant impact. Instead of referencing Tables 4.2-7 and 4.2-8, this section should include a table summarizing the results of the HRA and comparing the results to thresholds of significance for cancer, chronic, and acute risk. See Comment 17, for APCD's guidance on how to properly assess health risk. 8-35

27. **Section 4.2 Air Quality, Project Impacts, Threshold 4.2-5, Page 4.2-28:** This threshold evaluates the project's potential to create objectionable odors affecting a substantial number of people.

    a. Given the nature of the activities onsite, substantial evidence should be provided to support the conclusion that odors are not likely to affect sensitive off-site receptors.

    b. Note that other activities, in addition to race vehicle emissions and tire smoke, could create objectionable odors, such as food preparation at the onsite concession stands.

    c. The project should consider the development of an Odor Abatement Plan so that a strategy for abating impacts is in place in the event that odors from the site become a nuisance to the surrounding receptors.

8-36

28. **Section 4.2 Air Quality, Cumulative Impacts, Page 4.2-29:** This page states that, "*As indicated in Table 4.2-8 above, the highest daily emissions estimated for the proposed Project would exceed SBAPCD [sic] daily mobile significance thresholds.*" It appears the author intended to refer to Table 4.2-9. Please correct. 8-37

29. **Section 4.2 Air Quality, MITIGATION MEASURES, Page 4.2-29-30:** Many of the mitigation measures listed have detailed restrictions or prescriptions for use of the property and operation of project activities. As required by CEQA Guidelines Section 15091(d), "*These measures must be fully enforceable through permit conditions, agreements, or other measures.*" Proposed mitigation measures should be made **enforceable conditions of approval** by the lead agency. In addition, as required by CEQA Guidelines Section 15097(a), the lead agency shall adopt a **mitigation monitoring and/or reporting program**. 8-38

30. **Section 4.2 Air Quality, MITIGATION MEASURES, Page 4.2-29:** Measure MM 4.2-1 states that, "*A Fugitive Dust Control Plan shall be prepared and submitted to the City of Lompoc and Santa Barbara County Air Pollution Control District (SBAPCD) [sic] for review and approval, before operation of the proposed motorsports park facility.*" Since the City of Lompoc is the approving authority for discretionary projects of this nature, the plan will be approved by the City; APCD has no approving authority. Please revise this statement to indicate that the plan shall be approved by the City, and remove reference to APCD. To help ensure the project does not create a public nuisance, a plan could be voluntarily submitted to the APCD for feedback if desired. 8-39

31. **Section 4.2 Air Quality, MITIGATION MEASURES, Page 4.2-29:** Measure MM 4.2-1 should be revised to clarify that fugitive dust control measures should be designed to control dust at the property line. This would help to ensure the proposed project does not create a public nuisance or visible emissions violation. 8-40

32. **Section 4.2 Air Quality, MITIGATION MEASURES, Page 4.2-29:** Measure MM 4.2-1 states that, *"All ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent."*

    a. This measure should include specific actions to produce the intended result, so this measure's performance and effectiveness can be monitored and evaluated. 8-41

    b. This proposed mitigation measure requiring water use should be evaluated for both its feasibility and its impact. Specifically, the EIR should consider: 1) how much water this measure would require, 2) if there is sufficient water available to accomplish the proposed measure, and 3) the impact on water resources as a result of the proposed water use.

33. **Section 4.2 Air Quality, MITIGATION MEASURES, Page 4.2-30:** This page states that, *"As discussed above, the proposed Project includes Project Design Features that reduce the amount of vehicle trips and the air emissions generated by those mobile sources to the maximum extent feasible by allowing camping on the site to further reduce the amount of vehicle trips and vehicle miles traveled by patrons, spectators, participants, and workers attending the motorsports events."* 8-42

    a. See Comment 18 above regarding the "Project Design Features."

    b. If overnight recreational vehicle (RV) camping onsite will be allowed as part of the project description or as a mitigation measure, a maximum number of overnight RV's allowed to park onsite must be defined in order to quantify emissions and the how the project will reduce the amount of vehicle trips and the air emissions generated. This limit should be included as a condition of approval of the project.

34. **Section 4.2 Air Quality, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.2-30:** The third paragraph in this section states that, *"As discussed above in Threshold 4.2-2, the proposed Project particulate emissions would exceed the local significance thresholds for particulate matter (8 ug/m^3)."* See Comment 10, 13 and 21 for APCD's guidance on how to properly evaluate Threshold 4-2-2. 8-43

35. **Section 4.2 Air Quality, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.2-31:** The text states that, *"The emission results with mitigation measures MM 4.2-1 through MM 4.2-4 are shown in Table 4.2-9, Modeled Mitigated Emission Results. Impacts on local air quality around the site would be mitigated to a less than significant level with implementation of mitigation measure MM 4.2-1 through MM 4.2-4."* 8-44

    a. It appears the author intended to refer to Table 4.2-10 titled "*Modeled Mitigated Emission Results*".

b. **Provide substantial evidence to support the assertion that the project has been mitigated to a less than significant level through implementation of mitigation measure MM 4.2-1 through MM 4.2-4.** The EIR should explain how the implementation of the proposed mitigation measures would reduce emissions, how mitigated emissions were calculated, present emission totals before and after mitigation, and document how the mitigated concentrations were modeled. 8-44

36. **Section 4.2 Air Quality, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.2-31:** The text states that, "*In the event the restriction to the number of OHV vehicles, number of OHV races per hour, and the length of OHV events are determined to be infeasible with implementation of Mitigation Measures MM 4.2-2 through MM 4.2-4; then localized emission impacts would be considered adverse, significant, and unavoidable.*" This statement seems to imply the project could have a Class I or Class II impact, and that the proposed mitigation measures identified in the EIR may or may not be feasible.

    The APCD has the following comments regarding the overall discussion of mitigation and level of significance after mitigation presented in the EIR (pages 4.2-29-32):

    An EIR must make a conclusion regarding the impact classification of the project, and mitigation measures must be identified and fully enforceable. Mitigation measures must be evaluated for their feasibility and effectiveness in reducing an impact. Evaluation of the significance of impacts or the feasibility and effectiveness of mitigation measures cannot be uncertain, speculative, deferred, or left to the unknown. 8-45

    As required by CEQA Statute §21002.1, §21081 and CEQA Guidelines §15091, for each significant environmental impact identified in an EIR, the lead agency must make one of three findings: 1) The impact has been mitigated to a level of insignificance, 2) Mitigation measures are the exclusive responsibility of another public agency that has adopted or will adopt them, or 3) Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Findings must be supported by substantial evidence in the record. Without an evaluation of the effectiveness of mitigation, finding under CEQA Section 21081 cannot be properly made.

    There is no evidence in the EIR of the amount of criteria pollutant emissions that would be reduced with the implementation of each of the proposed mitigation measures. As a result, measures are of unknown efficacy. This undermines CEQA's function to provide full disclosure of project impacts. Formulation of mitigation measures should not be deferred to a later date as is done here; this removes the topic from public review, and does not provide a commitment that measures can be implemented as enforceable project conditions.

37. **Section 4.2 Air Quality, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.2-31:** This page states that, "*As shown previously in Table 4.2-8, emissions generated by travel ....*" It appears the author intended to refer to Table 4.2-9. 8-46

38. **Section 4.2 Air Quality, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.2-31:** This page states that, "*The proposed Project includes Project Design Features that reduce the number and length of vehicle trips to the maximum amount feasible by allowing camping onsite.*" See Comment 33 above. 8-47

Attachment 1 – Detailed APCD Comments on the Draft EIR for the Lompoc Motorsports Project, SCH No. 2015121005
August 15, 2016
Page 13

39. **Appendix 4.2, Air Quality and Greenhouse Gas Output Files, Appendix 4.2a CalEEMod Output:**

    a. The project was modeled with an operational year of 2014. The operational year should reflect the earliest possible operational year of the project (i.e. the build-out year).

    b. Please consider whether the default trip purpose percentages for the "City Park" modeled land use are appropriate for the proposed project. The defaults are 66% primary, 28% diverted, and 6% pass-by. The trip length is adjusted (shortened) for the diverted and pass-by trip purposes. Due to the nature of the proposed use, the project may be more accurately and conservatively modeled with a higher percentage of primary trips.

    c. Please consider whether the default trip percentages for use types are appropriate for the proposed project. The defaults are 48% Commercial-Customer trips, 33% Commercial-Worker trips, and 19% Commercial Non-Work trips. Trip percentages should reflect the project-specific information in the traffic study. Based on the trip generation tables in the traffic study, it appears that the Commercial-Worker and Commercial Non-Work trips have been over-estimated, and the Commercial-Customer trips have been under-estimated. 8-48

    d. Please consider if it is appropriate to utilize the default fleet mix for the proposed project, or if adjustments should be made to reflect project-specific circumstances. For example, the projects anticipated fleet mix may involve more light-heavy duty trucks and motor homes than the default settings provide for.

       A more representative fleet mix could reflect spectator, employee, and a portion of participants assigned to a light-duty auto, light-duty truck, and motorhome class mix, and vehicles that haul race cars assigned to a vehicle class mix of light-duty trucks, medium-duty vehicles, and light-heavy duty trucks.

40. **Appendix 4.2, Air Quality and Greenhouse Gas Output Files, Appendix 4.2b Dispersion Model Output Files:** It is difficult to ascertain the basis for emission estimates, and the accounting of such estimates as Appendix 4.2b does not show totals of criteria pollutant emissions that can be cross-checked against emission estimates provided in the text. 8-49

41. **Section 4.6 Greenhouse Gas Emissions, Thresholds of Significance, Page 4.6-14:** It appears that this EIR is partially utilizing ACPD's adopted stationary source GHG thresholds to determine the significance of GHG impacts. Because this is a land use development project, the lead agency should consider whether utilizing a stationary source screening-level threshold is appropriate for this project type. 8-50

42. **Section 4.6 Greenhouse Gas Emissions, Thresholds of Significance, Page 4.6-14:** One of the significance criteria being applied to the project is the SCAQMD's draft framework efficiency target for 2035 of 3.0 $MTCO_2e$ per year per service population. The EIR states that it is defining service population to include *"participants/spectators/pit pass holders plus workers"*. 8-51

    A per-service population threshold is intended to avoid penalizing large projects that may have high total annual GHG emissions, but would be relatively efficient, as compared to projects of

similar scale. This threshold is most appropriately used for residential or commercial projects that would generate a large service population. In the development of the SCAQMD efficiency targets, the "service population (SP)" of a project is defined as the sum of the people who live (residents) and work (employees) in the project site (SP = residents + employees). Because the proposed project has no residential component (it is a commercial project), a service population-based threshold may not be appropriate for this project type. 8-51

43. **Section 4.6 Greenhouse Gas Emissions, Methodology, Page 4.6-15:** Insufficient information has been provided to determine if impacts have been analyzed appropriately. It is difficult to determine the methods of analysis used, and whether the information is factual, adequate, and complete. The discussion of methodology should articulate all of the emission sources and activities that have been quantified, the methods for quantification, and provide a more detailed explanation of the assumptions and parameters of the analysis. 8-52

44. **Section 4.6 Greenhouse Gas Emissions, Project Design Features, Page 4.6-15:** The project design features are not measures that are designed to reduce greenhouse gas emissions, they are measures designed to reduce emissions of ozone precursors (NO_X and ROC) and fugitive dust (particulate matter emissions). Therefore, these measure could be appropriately associated with the reduction of criteria pollutant emissions, but not GHG emissions. 8-53

45. **Section 4.6 Greenhouse Gas Emissions, Project Impacts, *Operation*, Page 4.6-17-18:** It is unclear what the assumptions of the "worst-case" analysis are and what scenarios were modeled. See Comment 43. 8-54

46. **Section 4.6 Greenhouse Gas Emissions, Project Impacts, *Operation*, Page 4.6-18:** It appears the author intended to refer to Table 4.6-4, instead of "Table 4.3-4". Please correct. 8-55

47. **Section 4.6 Greenhouse Gas Emissions, Project Impacts, Table 4.6-4 Operational GHG Emissions, Page 4.6-18:**

    a. It is unclear if all of the project's emission sources were included in the current analysis, specifically if all onsite mobile sources have been quantified. Onsite mobile sources include emissions from race car vehicles, participant vehicles, employee vehicles, and spectator vehicles.

       Please provide a more refined breakdown of project emissions by source, and an explanation of where the supporting calculations for the onsite mobile emission total can be found. 8-56

    b. The operation of stationary sources, including (but not limited to) diesel generators powering the portable light system, and generator sets powering onsite RV visitors/campers should be quantified and included in the annual total.

    c. After evaluation of the operational emission estimates shown in this table, it appears that the GHG emission estimates for construction, regional mobile sources, area sources, energy, waste, and water are from the same CalEEMod model run as the run to estimate daily emissions. The scenario that was modeled in CalEEMod was a specific mix of planned activities on a worst-case weekday day (Wednesday) and worst-case

weekend day (maximum use of the drag strip peak event scenario). Therefore, when calculating annual emissions, the model assumes that every weekday of the year is the "Wednesday" trip generation profile, and every weekend day of the year is the "maximum use of the drag strip peak event scenario" trip generation profile.

The project description states that there will also be nonracing events at the site, and that, *"It is anticipated that 2 to 8 nonracing events, with up to 1,250 spectators and up to 50 participants, would occur within the Project site annually."* These trips should be accounted for in the analysis as well.

8-56

d. It appears that emissions presented in this table are mitigated emissions estimates. The EIR should disclose the projects impact before mitigation measures have been applied. **Please present both unmitigated and mitigated emission estimates.**

e. To justify the resultant mitigated emission estimates, the lead agency should include each of these selected measures as a mitigation measure in the EIR that is enforceable through a mitigation and monitoring program and as a condition of approval for the project or other mechanism.

f. The table that references the source of CalEEMod emission calculations should cite Appendix 4.2, not "Appendix 4.3".

48. **Section 4.6 Greenhouse Gas Emissions, Cumulative Impacts, Page 4.6-20:** This section states that, *"...there is currently no general accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions."* It is unclear what is meant by this statement. Given the nature of the proposed use, it appears user trips to the site represent new trips. 8-57

49. **Section 4.6 Greenhouse Gas Emissions, Cumulative Impacts, Page 4.6-20:** This page states that, *"Implementing the Project Design Features and GHG-reducing measures would result in a net decrease in GHG emissions. The proposed Project's design features and GHG reduction measures make the project consistent with the goals of AB 32."* The EIR does not explain or quantify how project design features and mitigation measures result in a net decrease in GHG emissions. **Please provide substantial evidence to support these conclusions.** 8-58

50. **Section 4.6 Greenhouse Gas Emissions, Cumulative Impacts, Page 4.6-20:** This page states that, *"Given the proposed Project's consistency with state GHG emission reduction goals and objectives, the Project's contribution to the cumulative impact of greenhouse gas emissions would not be cumulative considerable and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (i.e., the 2014 Updated Scoping Plan). Similarly, related projects would also be anticipated to comply with these same emissions reduction goals and objectives. Therefore, cumulative impacts with respect to greenhouse gas emissions would be less than significant."* **Please provide substantial evidence to support these conclusions.** 8-59

51. **Section 4.6 Greenhouse Gas Emissions, MITIGATION MEASURES, Page 4.6-20:** The discussion of mitigation measures consists of the following sentence, *"Mitigation measures 4.2-1 through 4.2-4 as identified in Section 4.2 shall be implemented."* 8-60

a. It is unclear why mitigation measures would be necessary as the EIR determines that impacts are less then significant.

b. The mitigation measures in Section 4.2 are intended to reduce criteria pollutant emissions, although some, but not all, may result in GHG emission reductions as well. 8-60

c. **Provide substantial evidence detailing how the implementation of these measures would reduce GHG emissions and by what amount.**

d. Mitigation measures should be made enforceable through a mitigation and monitoring program and as a condition of approval for the project.

52. **Section 4.6 Greenhouse Gas Emissions, LEVEL OF SIGNIFICANCE AFTER MITIGATION, Page 4.6-20:** This section states that, "*Development of the proposed Project would be consistent with the SBAPCD [sic] stationary threshold (for analysis purposes only) and the draft SCAQMD's draft framework efficiency target for 2035, and would incorporate best management practices which aim to reduce indirect energy consumption.*"

    a. See Comments 41 and 42. 8-61

    b. Note that the project's "indirect energy consumption" is a small portion of the project's total GHG emissions. The majority of emissions are from transportation sources.

    c. It is unclear what "best management practices" are proposed for the project that would reduce indirect energy consumption, as the "project design features" and "mitigation measures" proposed to reduce GHG emissions mainly focus on reducing criteria pollutant emissions (see Comment 44), and those measures that would have the co-benefit of reducing GHG emissions are relevant to transportation emissions.

53. **Appendix 4.6, Greenhouse Gas Calculations:** It is difficult to ascertain the basis for the emission estimates. Appendix 4.6 does not show totals of GHG emissions in terms of $MTCO_2e$/yr that can be cross-checked against emission estimates provided in the text. 8-62

The APCD also has the following advisories regarding compliance with APCD permit requirements and prohibitory rules:

1. The proposed project includes operations and/or equipment that may be subject to APCD permit requirements and prohibitory rules. Therefore, **APCD may be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the Draft EIR when evaluating any APCD permits for proposed equipment**. The Draft EIR should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to APCD permit issuance. 8-63

2. Prior to building permit issuance, **APCD Authority to Construct permits** must be obtained for all operations/equipment that requires an APCD permit. Proof of receipt of the required APCD permits shall be submitted by the applicant to planning staff. *The APCD permit process can take several months. To avoid delay, the applicant is encouraged to submit their Authority to*

Construct permit application to the APCD as soon as possible, see www.ourair.org/permit-applications/ to download the necessary permit application(s).

3. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (APCD Form ENF-28 or APCD Form ENF-28e), which can be downloaded at www.ourair.org/compliance-forms/ for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed exemption or notification should be presented, mailed, or emailed to the Santa Barbara County Air Pollution Control District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. The applicant should refer to APCD's website at www.ourair.org/asbestos/, to determine whether the project triggers asbestos notification requirements or whether the project qualifies for an exemption.

8-63

4. Project activities are subject to Rule 302, *Visible Emissions*, Rule 303, *Nuisance*, and Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*.

5. The storage and transfer of organic fuels greater than 250 gallons may require an APCD Authority to Construct and/or Permit to Operate permits.

6. If contaminated soils are found at the project site, the APCD must be contacted to determine if Authority to Construct and/or Permit to Operate permits will be required.

7. Petroleum storage tank degassing activities shall comply with APCD Rule 343, *Petroleum Storage Tank Degassing*. Please see www.ourair.org/tank-degassing/ for more information.

8. Asphalt paving activities shall comply with APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

Letter No. 8: Carly Barham, Air Quality Specialist, Santa Barbara County Air Pollution Control District, August 15, 2016

Response 8-1

The Draft EIR evaluated air quality (Section 4.2), greenhouse gas emissions (Section 4.6), and hazards (Section 4.7) specific to these potential impacts. Furthermore, an Air Quality Technical Memorandum (see **Appendix 2.2** of the Final EIR) has been prepared describing the methodology of the analysis and dispersion modeling used to disclose potential impacts.

Response 8-2

Section 4.2, Air Quality in the Draft EIR contains a methodology section (page 4.2-18 through 4.2-26) describing how construction emissions, operation emissions, and toxic air contaminants were calculated. The analysis was based on the project description and three operation scenarios (see page 3.0-26-30 in Section 3.0 of the Draft EIR). Section 4.6, Greenhouse Gas Emissions in the Draft EIR contains a similar methodology (page 4.6-15). In addition, please refer to Appendix 2.2, Air Quality Technical Memorandum to the Final EIR specific to the methodologies and scenarios used to analyze potential impacts from criteria air pollutants.

Response 8-3

Regional emissions were analyzed in Section 4.3 of the Draft EIR. Table 4.2-6, Mass Daily Emissions Thresholds in Section 4.2 of the Draft EIR, identifies Santa Barbara County Air Pollution Control District (SBCAPCD) thresholds to determine the significance of impacts to air quality during project operation. Please note the SBAPCD does not have quantitative thresholds of significance in place for short-term or construction emissions. SBAPCD uses 25 tons per year for ROC, NOx, or PM10 as a guideline for determining significance of construction impacts. Due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO “hotspot” analyses are not required. The proposed Project would result in a potentially significant impact if it would emit more than 25 pounds per day of NOx or VOC from motor vehicle trips only.

The maximum daily operational emissions for both stationary and mobile sources were analyzed. As identified in Table 4.2-8, Construction Emissions (tons/year), the proposed Project would not exceed construction emissions thresholds. Impacts would be less than significant. Table 4.2-9, Operational Emissions identifies less than significant regional operational emissions (from all sources) and significant VOC and NOx impacts from regional mobile emissions.

In consultation with the SBAPCD,[4] the following thresholds for each criteria pollutant for operations of the proposed Project are utilized for analysis and are identified in **Table 4.2-7, Air Quality Increment Change Criteria**. This analysis requires the use of air dispersion modeling to identify pollutant concentrations associated with discrete Project-related emissions. Refer to **Appendix 2.2** of the Final EIR for dispersion analyses specific to criteria air pollutants. To assess exposures to toxic compounds, the analysis was limited to short duration exposures (i.e., 1-hour and 8-hours). Chronic or long-term exposures (e.g., 30 years) were not considered as event scenarios were based upon single day activities. It would be speculative to forecast chronic or long-term exposures to emissions without information and schedules to reflect reasonable assumptions associated with seasonal event activities. Since the proposed Project would allow motorsports events during weekday and weekend events, the most relevant thresholds are the 1-hour, 8-hour, and 24-hour thresholds as opposed to annual standards.

As indicated in Appendix 2.2, the proposed Project would result in significant PM10 impacts prior to mitigation (greater than 8 $\mu g/m^3$). Various scenarios were run and mitigation was applied to reduce the significant PM10 emissions below 8 $\mu g/m^3$. Similarly, various scenarios were run and mitigation was applied to reduce NO2 (1-hour) and CO (1-hour and 8-hour) below the significance thresholds.

As discussed in Section 4.6 in the Draft EIR, the City has not developed or adopted GHG significance thresholds. The City does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (see page 4.6-14). In April 2015, the SBCAPCD adopted thresholds of significance for GHG emissions for stationary sources. The thresholds of significance adopted for GHG emissions are applicable to new or modified stationary sources. Stationary source projects include land uses with processes and equipment that require a SBCAPCD permit to operate, such as oil and gas facilities, landfills, and facilities with large combustion devices. Please note the adopted GHG thresholds previously identified were not designed to be applicable to land use development projects/plans (i.e., commercial and residential development projects).

The performance standard identified in the 2014 Updated Scoping Plan recommends a 15 percent reduction from business-as-usual (BAU) by 2020. That document is the most current reference which quantifies statewide GHG emissions and the percentage reduction required by AB 32 mandates to meet GHG reduction goals. As indicated in the 2014 Updated Scoping Plan, CARB encourages local governments and air districts to meet the 15 percent reduction below today's levels by 2020 to ensure their municipal and community-wide emissions match the State's reduction target. That threshold will not be applied in

4 Telephone conversation between Carly Barham, Air Quality Specialist, SBAPCD and Chris Hampson, Meridian Consultants on Friday, April 22, 2016.

light of the California Supreme Court Decision found at 62 Cal.4th204, filed November 30, 2015, which requires examination of the data behind the BAU reduction.

The proposed Project would result in a potentially significant impact if it would:

- Exceed the 10,000 MTCO2e per year screening threshold;
- Show non-compliance with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions (sources subject to the AB 32 Cap- and- Trade requirements pursuant to Title 17, Article 5 (California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms); or
- Meet South Coast Air Quality Management District draft framework efficiency target for 2035: 3.0 MTCO2e per year per service population (defined to include participants/spectators/pit pass holders plus workers)

Response 8-4

As discussed in the methodology in Section 4.2, several different scenarios were run to calculate operation emissions. The California Emissions Estimator Model (CalEEMod) was used to generate regional emissions and annual emissions. Sources of regional emissions were attributed to overall trips during a weekend event for each scenario. Onsite emissions included the daily trips within the Project site and electricity was accounted for in regional emissions. In addition, Section 3.0 in the Draft EIR identified three different operation scenarios in order to analyze potential impacts from the proposed Project. The Drag Strip – Specialty Drag Race Weekend only event would include approximately 1,120 vehicles and approximately 2,640 persons. The OHV – Saturday nonevent Open Riding/No Racing and Drag Strip – Specialty Drag Race event would include approximately 1,160 vehicles and approximately 2,700 persons. The OHV – Endurocross Quarterly regional event and Oval Track regional cart events would include approximately 930 vehicles and approximately 2,580 persons. The three scenarios considered provided the maximum amount of attendees and vehicles for each weekend event day.

As discussed in Section 4.6, GHG emissions were conducted for operation of the OHV and Drag Strip scenarios. The annual metric tons of carbon dioxide equivalents (MTCO2e) from each scenario identified above were added to the annual MTCO2e per year generated by the CalEEMod for the regional emissions. As indicated in Table 4.6-4, Operational GHG Emissions, the proposed Project would generate approximately 8,198 MTCO2e per year.

Refer to Appendix 2.2 to the Final EIR for a full discussion regarding air quality impacts. Criteria and non carcinogenic hazard emissions prior to, and after mitigation, are identified.

Response 8-5

Refer to Appendix 2.2 to the Final EIR for a full discussion regarding criteria air pollutant impacts. As discussed, with implementation of mitigation measures, PM10 concentration levels would be below the significance threshold of 8.0 $\mu g/m^3$. As such, emissions would result in a less than significant impact.

Response 8-6

Please refer to Response 8-3 and Response 8-5. Sensitive receptors within 1 mile were included in the criteria air pollutant (see Figure 2 Receptor Grid Network in Final EIR Appendix 2.2). To assess exposures to toxic compounds, the analysis was limited to short duration exposures (i.e., 1-hour and 8-hours). Chronic or long-term exposures (e.g., 30 years) were not considered as event scenarios were based upon single day activities. It would be speculative to forecast chronic or long-term exposures to emissions without information and schedules to reflect reasonable assumptions associated with seasonal event activities. Since the proposed Project would allow motorsports events during weekday and weekend events, the most relevant thresholds are the 1-hour, 8-hour, and 24-hour thresholds as opposed to annual standards.

Response 8-7

Please refer to **Appendix 2.2** of the Final EIR for the methodology used to calculate criteria air pollutant emissions. According to CEQA Guidelines Section 15126.4(a)(5), if the lead agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination. Should it certify the EIR and decide to move forward with the Project, the City would need to adopt a Statement of Overriding Considerations noting the reasons the City believe the benefits outweigh the significant impacts.

Response 8-8

Please refer to Response 8-2.

Response 8-9

The Draft EIR analysis was based on the project as proposed by the Applicant. In response to conditioning the number of parking spaces, the City could require as Condition of Approval of the Project, limits on the number of parking spaces and the number and length of each event.

Response 8-10

As noted in the Draft EIR, Section 3.0, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained. Because the Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use. As indicated in Section 3.0 in the Draft EIR (page 3.0-8), the proposed Project would provide 1,120 spaces (523 spaces in the main parking area, 159 spaces for OHV parking, 356 spaces for pit area parking, and 80 spaces for drag strip parking). Overflow parking of 160 spaces would be provided for OHV events on the drag strip when the drag strip is not in use.

Please refer to Response 8-4 which identifies the three scenarios analyzed and the number of people. **Appendix 2.2** of the Final EIR contains specific breakdown of vehicle type.

Response 8-11

Text to the Final EIR has been revised to clarify that the federal ozone level has changed. Please refer to **Section 3.0, Revisions to the Draft EIR** in the Final EIR for this revision.

Response 8-12

This comment is noted.

Response 8-13

Please refer to Responses 8-3 and 8-6.

Response 8-14

Please refer to Responses 8-2 and 8-5 above.

Response 8-15

As evaluated in Section 4.3 in the Draft EIR, impacts from vehicular travel to and from the Project site would still remain significant and unavoidable. While the proposed he Project would work to reduce emissions from vehicular traffic and reduce vehicle miles traveled, emissions generated for a single day would remain above daily mass significance thresholds for NOx and VOC adopted by SBCAPCD. Regardless, impacts would be significant and unavoidable under these thresholds developed by SBCAPCD. The proposed Project includes Project Design Features that reduce the number and length of vehicle trips to the maximum amount feasible by allowing camping onsite. As indicated in **Appendix 4.13**, trips were determined to be an average of 2.5 persons per spectator vehicle and 3 persons per participant and pit crew vehicle. It would not be feasible to further reduce trips by patrons to and from the Lompoc Valley

to attend weekend motorsports events due to those trips originating from numerous separate locations at different times by individual patrons. The daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason.

Response 8-16

Refer to **Appendix 2.2** of the Final EIR for dispersion modeling conducted for the Draft EIR. Output files are attached to this appendix.

Response 8-17

Refer to **Appendix 2.2** of the Final EIR for dispersion modeling conducted for the Draft EIR. Output files are attached to this appendix.

Response 8-18

Please refer to Response 8-6**.**

Response 8-19

Table 4.2-6, Mass Daily Emissions Thresholds in Section 4.2 of the Draft EIR, contains the APCD Board-adopted thresholds of significance. Page 4.2-16 of the Draft EIR identifies the APCD Board adopted threshold for motor vehicle trips only specific to VOC and NOx. Page 4.2-17 of the Draft EIR identifies the APCD Board adopted threshold for a health risk. Please refer Table 8, Air Quality Significance Thresholds in **Appendix 2.2** of the Final EIR specific to contribution to a violation of any California or National Ambient Air Quality standard.

Response 8-20

Please refer to Response 8-19.

Response 8-21

This comment is noted.

Response 8-22

Please refer to Response 8-3 and Response 8-6.

Response 8-23

Please refer to Table 2, Event Activity, Table 3, Vehicle Fleet Mix Profile, Table 4, Drag Strip Vehicle Fleet Profile, and page 5 under Off Highway Vehicles (OHV) in **Appendix 2.2** of the Final EIR for emissions sources. In addition, please refer to Response 8-4.

Response 8-24

Please refer to Response 8-4 and 8-10.

Response 8-25

Please refer to **Appendix 2.2** of the Final EIR. Air dispersion modeling was conducted for the proposed Project and did use EMFAC2014.

Response 8-26

Please refer to Response 8-3 and 8-6.

Response 8-27

The requirement for proposed Project design features specific to construction is a regulation applicable to minimizing fugitive dust. In addition to the Mitigation Measures required of the proposed Project and any proposed Project Design Features, the applicant shall also adhere to any applicable Regulatory Compliance Measures required by law. If the City Council approves the proposed Project, then the City would be responsible for assuring the required mitigation measures are completed, pursuant to CEQA Guidelines Section 15097; and the City would be required to adopt a Statement of Overriding Considerations with regard to the unmitigatable significant air quality impacts.

Response 8-28

Section 4.2 of the Draft EIR under the Project Impact discussion first identified potentially significant impacts prior to incorporation of mitigation. Impact 4.2-1 discusses the proposed Project in relation to the 2013 Final Clean Air Plan and refers to the emissions analysis presented to Impact 4.2-2. Impact 4.2-3 (cumulatively considerable) refers back to the analysis in Impact 4.2-2. Mitigation measures were then applied to the proposed Project to reduce potentially significant air quality impacts (see page 4.2-29). The Level of Significance After Mitigation (see page 4.2-30 and 4.2-31) includes the final emissions numbers after mitigation. Each paragraph follows the impact threshold analysis (i.e., the first paragraph covers Impact 4.2-1 and the second paragraph covers Impact 4.2-2, etc.).

Response 8-29

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Response 8-30

Please refer to **Appendix 2.2** of the Final EIR which provides analysis specific to criteria air pollutants. Additional analysis was also presented for operational emissions (see Table 4.2-9). Mitigation was identified to reduce all potentially significant impacts.

Response 8-31

Please refer to Response 8-27 and Response 8-28.

Response 8-32

Page 4.2-1 in the Draft EIR contains a definition for VOC and ROG.

All emission sources were quantified as reported in Section 4.2 in the Draft EIR. Additional clarification for emissions specific to each event scenario is provided in Tables 2 through 4 in **Appendix 2.2** of the Final EIR.

Please refer to Response 8-4 for clarification on proposed Project emissions by source.

Response 8-33

Please refer to Response 8-22 and the comment is noted.

Response 8-34

Please refer to Response 8-29.

As indicated in Section 4.2 in the Draft EIR, the proposed Project would result in a cumulatively considerable contribution (see page 4.2-30) from mobile vehicle emissions.

Response 8-35

Please refer to Response 8-3 and 8-26.

Response 8-36

Section 4.2 of the Draft EIR, page 4.2-28 includes a discussion on odors. Due to the distance of sensitive receptors from the proposed Project site, it is not anticipated that the proposed Project's day to day

operations would generate an objectionable source that would result in a significant change in existing odor impacts to the local receptors.

Response 8-37

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Response 8-38

The Draft EIR identifies a number of mitigation measures. If the City Council approves the proposed Project, then the City would be responsible for assuring the required mitigation measures are completed as required by CEQA Guidelines Section 15097 as noted below:

- In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.
- The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. “Reporting” generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure.

Response 8-39

The clarification is noted the SBCAPCD cannot approve the Fugitive Dust Control Plan; only the City can make that determination.

Response 8-40

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Response 8-41

Please refer to Section 4.14.1, Water Service in the Draft EIR. The amount of water anticipated to meet the mitigation requirement was included in the analysis. As determined in Section 4.14.1, the City has available water supplies to provide to the proposed Project for dust control.

Response 8-42

Please refer to Response 8-27 and Response 8-10.

Response 8-43

Please refer to Response 8-14, 8-21, and 8-30.

Response 8-44

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Please refer to **Appendix 2.2** of the Final EIR for additional clarification.

Response 8-45

Please refer to **Appendix 2.2** of the Final EIR for additional clarification on how emissions were modeled and how implementation of the mitigation measures reduced potentially significant impacts.

Response 8-46

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Response 8-47

Please refer to Response 8-42.

Response 8-48

Please refer to Section 4.2 in the Draft EIR for methodology specific to CalEEMod. For the purposes of estimating the amount of regional mass air emissions generated by the travel, it was assumed local patrons within the Lompoc Valley would travel an average of 20 miles to the site. For regional patrons, it was assumed travel would be an average of 60 miles to the site with the majority of total trips assumed to be regional for purposes of analysis.

Response 8-49

Please refer to **Appendix 2.2** of the Final EIR for additional clarification.

Response 8-50

Please refer to Response 8-3.

Response 8-51

As indicated in the comment, the proposed Project is a commercial recreation based land use. Application of the service population threshold would be appropriate as the proposed Project would generate a large number of persons on site each day and the proposed Project is a recreational use with a commercial aspect.

Response 8-52

Please refer to Response 8-4. All emission sources generated during operation of the proposed Project were considered (see page 4.6-17). Specifically, mobile emissions from regional travel to the site, onsite vehicle travel, emissions from stationary sources onsite, and operation of the OHV and/or drag strip components of the proposed Project.

Response 8-53

This comment is noted.

Response 8-54

Please refer to Response 8-4.

Response 8-55

Please refer to Section 3.0, Revisions to the Draft EIR for those additional clarifications.

Response 8-56

Please refer to Response 8-52. Appendix 4.6 of the Draft EIR includes emission calculations, including conversion of onsite OHV and/or Drag strip uses, to MTCO2e per year. Page 7 of this Appendix identifies 1,057.9 MTCO2e per year as the onsite operation GHG emissions.

Response 8-57

Please refer to Section 3.0, Revisions to the Draft EIR for these additional clarifications.

Response 8-58

As evaluated in Section 4.2 of the Draft EIR, emissions generated by travel by patrons to the City and Lompoc Valley to attend the proposed Projects facility would be a primary source of operational emissions that would result in the proposed Project exceeding SBAPCD daily vehicle mobile mass emission thresholds. Therefore, the number of trips or the lengths of the motor vehicle trips on a motorsports weekend event day would need to be reduced in order to provide a reduction in the operational emissions from the proposed Project. While future vehicle emissions are expected to be reduced as a result of new emissions control technology in vehicles, that would not reduce the emissions produced by vehicles traveling to and from the proposed Project site to a less than significant level on a motorsports weekend event day.

The proposed Project includes Project Design Features that reduce the number and length of vehicle trips to the maximum amount feasible by allowing camping onsite. As indicated in **Appendix 4.13**, trips were

determined to be an average of 2.5 persons per spectator vehicle and 3 persons per participant and pit crew vehicle. It would not be feasible to further reduce trips by patrons to and from the Lompoc Valley to attend weekend motorsports events due to those trips originating from numerous separate locations at different times by individual patrons. Therefore, the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason

Response 8-59

As evaluated in Section 4.6 of the Draft EIR, the proposed Project would result in 8,198.6 MTCO2e per year with Project Design Features and Mitigation Measures. The maximum number of service persons during any one event scenario would be 2,700 persons. The proposed Project would result in 3.0 MTCO2e per year per service population, which is equivalent to the SCAQMD's draft target. The proposed Project would be below the 10,000 MTCO2e per year screening threshold and would be equivalent to 3.0 MTCO2e per year per service population efficiency target and impacts would be less than significant.

The City's 2030 General Plan includes goals and policies related to GHG reductions in the Conservation and Open Space Element. The proposed Project would incorporate measures that reduce GHG emissions. The proposed Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of the proposed Project's life-cycle. Those designs would increase the structures energy efficiency, water efficiency, and overall sustainability. Because the proposed Project achieves an efficient service population target, the proposed Project would be consistent with the City's General Plan to reduce GHGs.

Response 8-60

This comment is noted. As indicated in Table 4.6-4, Operational GHG Emissions, the proposed Project prior to mitigation would emit 8,198.6 MTCO2e per year. For analysis purposes, GHG emissions would fall below the 10,000 MTCO2e per year screening threshold for stationary land use projects proposed by the SBCAPCD. (Please note that the proposed Project is not considered a stationary land use by the SBCAPCD and the screening threshold has been used for analysis purposes only). The maximum number of service persons during any one event scenario would be 2,700 persons. The proposed Project would result in 3.0 MTCO2e per year per service population, which is equivalent to the SCAQMD's draft target. Impacts would be less than significant.

Response 8-61

Please refer to Response 8-50, 8-51, and 8-53.

Response 8-62

Please refer to Response 8-56.

Response 8-63

This comment is noted.

Santa Barbara County
PUBLIC Health
DEPARTMENT

Public Health Administration

300 North San Antonio Road • Santa Barbara, CA 93110-1316
805/681-5100 • FAX 805/681-5191

Takashi M. Wade, MD, MPH *Director*
Suzanne Jacobson, CPA *Chief Financial Officer*
Susan Klein-Rothschild, MSW *Deputy Director*
Douglas Metz, DPM, MPH *Deputy Director*
Polly Baldwin, MD, MPH *Medical Director*
Charity Dean, MD, MPH *Health Officer*

October 5, 2016

City of Lompoc
Attn: Lucille Breese, AICP, Planning Manager
Economic Development Department, Planning Division
100 Civic Center Plaza
Lompoc, CA 93438

Dear Ms. Breese:

SUBJECT: Lompoc Motorsports Park
Environmental Impact Report (SCH No. 2015121005)

The Public Health Department and County Animal Services has concerns about this project having a significant impact on the welfare of the shelter animals at the Lompoc Animal Shelter causing extreme stress. With an outdoor kennel design, the additional noise (and dirt/dust) could have a significant impact on the animals' well-being, our volunteers' experience, and client care. After hours racing events will not allow shelter animals the rest they require. 73-1

Noise may also affect our business at the office and concerns for clients and volunteers avoiding this area because of noise. 73-2 It may also impact the street activity on Central Avenue. Currently there is an inordinate amount of high speed traffic west bound that causes safety concerns for traffic in and out of our parking lot which is directly adjacent to the street. This project may exacerbate those safety concerns. 73-3

Please consider these comments when finalizing the EIR. If you have questions, please call me at 934-6953.

Sincerely,

Jan E. Glick

Jan E. Glick, MS
Director, Animal Services

Healthier communities through leadership, partnership and science.

Letter No. 73: Jan E. Glick, MS, Director, Animal Services, Santa Barbara County Public Health Department, October 5, 2016

Response 73-1

As analyzed in Section 4.10, Noise, of the Draft EIR, sensitive receptor number 16 (see Table 4.10-6, Proposed Project Area Sensitive Receptor Locations) was identified as the Animal Services center and potential noise levels were included. As indicated in Table 4.10-9, Existing plus Project, proposed Project traffic levels along V Street would increase noise levels; however, they would fall below the lowest exterior (60 dB(A)) and interior (45 dB(A)) noise standards identified in the City's General Plan Noise Element. During operation of the proposed Project, all three scenarios, (Drag Strip Racing, Drag Strip Racing and OHV Trail Ride Area, and OHV Riding) would generate noise levels below 52 dB(A) at the Animal Shelter. These noise would fall below the City's standards and would result in less than significant impacts.

With regard to air quality and dust specifically, see pages 4.2-23–27 of the Draft EIR, which provide analysis of emissions for particulates (PM10 and PM2.5). To reduce dust emission, the Draft EIR identifies the following mitigation:

MM 4.2-1 A Fugitive Dust Control Plan shall be prepared and submitted to the City of Lompoc and Santa Barbara County Air Pollution Control District (SBCAPCD) for review and approval, before operation of the proposed motorsports park facility. The Fugitive Dust Control Plan shall be implemented and shall include measures to control emissions of airborne particulate matter associated with on-site off-highway vehicle (OHV) and drag strip activities sufficient to ensure particulate matter is below the 8 $\mu g/m^3$ threshold. Measures to be included in the Fugitive Dust Control plan to control operational emissions shall include, but are not limited to, the following:

- On-site access roads extending from George Millar Drive and V Street shall be paved.
- The Open Riding and Trail area shall be limited to 14 OHVs per hour.
- All ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent.

MM 4.2-2 The motorsports operator shall limit the number of OHV vehicles, OHV races, and length of OHV events based on the anticipated weekend events for concurrent operation of the Oval Cart Track and Stadium Cross events in accordance with the following requirements:

- Restrict the operation of the oval cart track events to 2 races per hour for 6 hours each weekend day.
- Restrict the operation of stadium cross events to 2 races per hour for 6 hours each weekend day.

MM 4.2-3 When the Oval Cart Track and Stadium Cross events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Enduro Cross event in accordance with the following requirement:

- Restrict the endurocross track events to 2 races per hour for 6 hours each weekend day.

MM 4.2-4 When the Oval Cart Track and Stadium Cross events or the Enduro Cross Only events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Motor Cross event in accordance with the following requirement:

- Restrict motorcross events to 18 vehicles with 1 race per hour for 3 hours each weekend day.

As discussed above, the proposed Project includes project design features that reduce the amount of vehicle trips and the air emissions generated by those mobile sources to the maximum extent feasible by allowing camping on the site to further reduce the amount of vehicle trips and vehicle miles traveled by patrons, spectators, participants, and workers attending the motorsports events.

Impacts on local air quality related to dust would be mitigated to a less than significant level**.**

As indicated in Section 3.0 Project Description of the Draft EIR, the hours of operation during the weekdays would be 4:00 PM until sunset, or 10:00 PM with lights, and during the weekends would be 9:00 AM until sunset, or 10:00 PM with lights.

Response 73-2

Please refer to Response 73-1 with respect to noise levels generated during operation of the proposed Project.

Response 73-3

Vehicles would utilize George Millar Drive via SR 1 during weekday events and would not utilize Central Avenue or V Street. Vehicles would utilize V Street during weekend events. Section 4.13 of the Draft EIR,

discusses traffic and the resultant conditions with the proposed Project. Specifically, **Mitigation Measure MM 4.13-2** would require the Applicant develop a traffic control plan to lessen that potential impact of queuing into the proposed Project site to less than significant. The Draft EIR determined, with the implementation of the proposed mitigation measures **MM 4.13-1** and **MM 4.13-2** and compliance with project design feature PDF 4.13-1, traffic impacts would be less than significant.

Fire Department
"Serving the community since 1926"
HEADQUARTERS
4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Eric L. Peterson
Fire Chief
County Fire Warden

Rob Heckman
Deputy Fire Chief

July 18, 2016

City of Lompoc
Attn: Lucille Breese, AICP, Planning Manager
Economic Development Department, Planning Division
100 Civic Center Plaza
Lompoc, CA 93438

Dear Ms. Breese:

SUBJECT: Lompoc Motorsports Park
Environmental Impact Report (SCH No. 2015121005)

The Santa Barbara County Fire Department has no additional comments for the EIR for this proposed project.

As this project lies within the jurisdiction of the Lompoc Fire Department, my staff has contacted and collaborated with the Deputy Fire Marshall for the Lompoc Fire Department and support their conclusions and comments. 74-1

As always, if you have any questions or require further information, please call 681-5066 or 681-5523.

In the interest of life and fire safety,

Rob Hazard
DeputyFire Marshal

RH: ft

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, Vandenberg Village

Letter No. 74: Rob Hazard, Deputy Fire Marshal, County of Santa Barbara Fire Department, July 18, 2016

Response 74-1

The comment is noted and will be forwarded on to the decision makers.

County of Santa Barbara
Planning and Development
Glenn S. Russell, Ph.D., Director
Dianne Black, Assistant Director

August 11, 2016

Lucille Breese, Planning Manager
City of Lompoc
Economic Development Department, Planning Division
100 Civic Center Plaza
Lompoc, CA 93438

Via email to: L_BREESE@ci.lompoc.ca.us

RE: Draft EIR for Lompoc Motorsports Project

Dear Ms. Breese:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Lompoc Motorsports Project. At the time, Santa Barbara County Planning & Development offers the following comments related to Traffic and Circulation (Section 4.13):

1. Page 4.13-9 discusses the regulatory setting, but does not include the Santa Barbara County Circulation Element. The discussion should include applicable policies and goals of the County's Circulation Element, as the following roadways and intersections are located within County unincorporated areas: 75-1
   - State Route 1, North, from 1.0 miles north of the Purisima Road intersection.
   - Harris Grade Road, north from the Burton Mesa Boulevard intersection.

2. Threshold 4.13-1 should consider the Santa Barbara County Circulation Element as an "applicable policy" since the traffic impacts and the roads studied extend into Santa Barbara County jurisdiction. 75-2

3. Mitigation measure MM 4.13-1 should consider fair share contributions to Santa Barbara County for road improvements on the sections of roads within County unincorporated areas that are impacted by the proposed project. 75-3

Please consider these comments when finalizing your EIR. If you have any questions or comments regarding this letter, or would like to discuss these issues further, please call Mindy Fogg at (805) 884-6848.

123 E. Anapamu Street, Santa Barbara, CA 93101 • Phone: (805) 568-2000 • FAX: (805) 568-2030
624 W. Foster Road, Santa Maria, CA 93455 • Phone: (805) 934-6250 • FAX: (805) 934-6258
www.sbcountyplanning.org

Draft EIR for Lompoc Motorsports Project
August 11, 2016
Page 2

Sincerely,

Glenn S. Russell, Ph.D., Director

cc: File

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Letter No. 75: Glenn S. Russell, Director, County of Santa Barbara Planning and Development, August 11, 2016

Response 75-1

Text to the Final EIR has been revised to include the County of Santa Barbara General Plan Circulation Element. Please refer to page 4.13-12 in **Section 3.0, Revisions to the Draft EIR** of the Final EIR, for this revision.

Response 75-2

As indicated in Section 4.13, Traffic and Circulation of the Draft EIR, the existing LOS is B at the SR 1/Harris Grade Road/Purisima Road intersection with a delay of 18.2 seconds during the weekday PM peak hour and LOS B with a delay of 18.6 seconds during the weekend peak hour. The proposed Project would add approximately 28 trips, or 0.5 seconds of delay, to the SR 1/Harris Grade Road/Purisima Road intersection during the weekday PM peak hour and approximately 140 trips, or 1.9 seconds of delay, during the weekend peak hour (see Table 4.13-8 and 4.13-9 of the Draft EIR). The increase in delay under the PM peak hour would be approximately 3 percent; which is less than the 10 percent standard for LOS C intersections identified in the County's Circulation Element. The increase in delay under the weekend peak hour would be approximately 10 percent, which is within the 10 percent standard for LOS C intersections identified in the County's Circulation Element. The Cumulative plus Project LOS during the weekday PM peak hour is C and would increase delay by 1.4 seconds at the SR 1/Harris Grade Road/Purisima Road intersection (see Table 4.13-12). The Cumulative plus Project LOS during the weekend peak hour is C and would increase delay by 1.4 seconds (see Table 4.13-13). The increase in delay under both peak hours would be approximately 6 percent, which is less than the 10 percent standard for LOS C intersections identified in the County's Circulation Element. Approximately 5 percent of the distributed proposed Project traffic would utilize Harris Grade Road north of the SR 1/Harris Grade Road/Purisima Road intersection. Accordingly, the proposed Project would be consistent with the County's General Plan Circulation Element.

Response 75-3

As noted in Response 75-2, the proposed Project would not exceed the County's Circulation Element standards. Accordingly, no improvements would be required at the SR 1/Harris Grade Road/Purisima Road intersection.

GORDON R. HENSLEY
ENVIRONMENTAL SERVICES
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P.O. Box 6884
Los Osos, CA 93412
G.R.Hensley@sbcglobal.net

RECEIVED
AUG 15 2016
Planning Division

City of Lompoc
Economic Development – Planning Division
100 Civic Center Plaza
Lompoc, CA 93438-8001
Attention: Lucille Breese, AICP, Planning Manager

August 15, 2016

Subject: Lompoc Motorsports Project Draft EIR

Dear Ms Breese,

On behalf of the Lompoc Valley Community Coalition and their representative Babak Naficy, esq. I submit the following comment on the Lompoc Motorsports Park Draft Environmental Impact Report. I hold a Master's Degree in Biology; am approved by the County of San Luis Obispo to conduct biological studies; and have participated in the preparation and review of EIR's and water quality issues of the Central Coast, including the Santa Ynez River.

My comments focus on some inaccuracies and inconsistencies in the Biological section as well as stormwater management at the proposed project site. I believe many of the conclusions in the DEIR regarding likely impacts to those resources are not supported by facts and the document fails to disclose to the City and the public significant environmental effects of the development and operation of the Motorsports project. 9-1

BIOLOGICAL RESOURCES

The highly destructive impacts to plants and animals caused by off-road vehicles have been well publicized (eg "Dunes to Stay Closed to Off-Road Vehicles", October 06, 2006, LA Times).

In contrast the DEIR proposes that habitat for endangered or special status species either isn't present at the Santa Ynez River site or those species can be relocated to other sites. Those conclusions, however, appear to be unsupported in some cases by substantial data and the document is unclear that proposed offsite mitigation methodologies exist that can assure decision makers and the public that relocation will succeed. 9-2

The 2 examples below illustrate some of the deficiencies of the DEIR:

A). Southwestern Willow Flycatcher (status, Endangered): During field studies for the DEIR no observations of individual birds were made; no critical habitat for Southwestern Willow Flycatcher was deemed to be present at the site; and no mitigation for the direct impact from removal of 14.5 acres of arroyo willow (*Salix lasiolepis*) thicket (BRC, Habitat And Natural Resources Assessment For The Lompoc Motorsports Park, April 2, 2016, p 18).

The claim that no critical habitat for Southwestern Willow Flycatcher is located on the project site appears to be in conflict with the US Fish and Wildlife Service position. Outlining the USFWS Recovery Plan for Southwestern Willow Flycatcher Critical Habitat in the Santa Ynez Management Unit, the Service specifically refers to the "lower 42.3-km (26.3-mi) Santa Ynez River Segment occurs immediately upstream from Vandenberg AFB." (50 CFR Part 17, Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Southwestern Flycatcher; Final Rule. In the Federal Register, Vol. 78 No.2, p 344, January 3, 2013). 9-2

The Final Rule also identifies the river in the Santa Ynez Management Unit as ..."the only stream in this Management Unit known to have flycatcher territories" (Sogge and Durst 2008, in the 2013 Final Rule listing at p 366).

B) Least Bell's Vireo (status, Endangered). During field studies for the DEIR no observations of individual birds were made; suitable habitat at the project site was present, but no CNDDB or ebird records with the project and nearby vicinity (BRC, Habitat And Natural Resources Assessment For The Lompoc Motorsports Park, April 2, 2016). No specific mitigation recommendation was made in the DEIR as it was deemed to have a low potential to occur at the project site (DEIR at 4.3-20)

During evaluation of a proposed project 15 miles away in Buellton, consultants performing a biological resources assessment in October 2014 made a similar statement as has been made in this DEIR, based on a lack of suitable habitat and review of CNDDB records, that Least Bell's Vireo wouldn't occur at that site,. However in April 2016, Least Bell's Vireo was confirmed on an adjacent parcel (see attached CNDDB Field Report) 9-3

Least Bell's Vireo is a species that migrates long-distance back and forth between the Santa Ynez River and Mexico, and is known to utilize both upland and riparian habitat for breeding and feeding. On the Santa Ynez River Least Bell's Vireo utilize riparian habitat mainly dominated by arroyo willow, red willow, and Fremont cottonwood trees, as well as mugwort and willow shrubs (Kus, B, 2002. Least Bell's Vireo (Bireo bellii pusillus). In, The Riparian Bird Conservation Plan: a strategy for reversing the decline of riparian-associated birds in California. California Partners in Flight).

The examples cited above highlight just 2 of the inaccuracies and inconsistencies that have led to inadequate and inappropriate project mitigation proposals. In addition there is great concern that the noise, odors, air pollution, and night lighting associated with OHV activites has not been adequately examined against studies of those conditions to disrupt significant aspects of the life needs of wildlife. 9-4

STORMWATER MANAGEMENT

The discussion of the proposed management of stormwater runoff focus mainly on the construction period and is quite vague on the specifics of how pollution will be prevented from reaching the Santa Ynez River or percolating into ground water , presenting a hazard for wildlife from ingesting poisonous contaminants or drowning in the proposed retention basins.

It appears from the DEIR that the post-construction stormwater system would consist of piping to receive relatively untreated stormwater runoff from a separate project (airport) and discharge it into 2 detention basins along either side of the proposed drag strip. In addition runoff from the drag strip and access roads will require infrastructure to catch runoff and discharge that load to the 2 retention basins as well. Also the balance of the 38 acre property will be graded/sloped to direct all stormwater not included in the infrastructure components above to the retention basins. However the DEIR fails to "show the work" that demonstrate that the proposed system is feasible and can meet Best Management Practices to reduce stormwater pollution to the maximum extent practicable. 9-5

The DEIR does not disclose the specific pollutants of concern that might be contained In runoff from an NHRA drag strip or an off-road vehicle track or the quantities of those contaminants. The City and public cannot make an informed decision about the adequacy of post-construction stormwater management.

The DEIR fails to analyze the potential amount of trash that might be generated through the operation of the Park and has not demonstrated to the City and the public how trash will be prevented from contaminating the river or present a hazard to wildlife or public health.

The DEIR fails to provide any analysis of stormwater management alternatives.

On behalf of my clients I request that you do not adopt this DEIR as a Final EIR 9-6

Respectfully,

Gordon R Hensley

Gordon Hensley

3

CNDDB Online Field Survey Form Report

California Natural Diversity Database
Department of Fish and Wildlife
1416 9th Street, Suite 1266
Sacramento, CA 95814
Fax: 916.324.0475
cnddb@wildlife.ca.gov
www.dfg.ca.gov/biogeodata/cnddb/

This data has been reported to the CNDDB, but may not have been evaluated by the CNDDB staff

Source code KIS16F0001
Quad code 3412052
Occ. no.
EO index no.
Map index no.

Scientific name: *Vireo bellii pusillus*

Common name: least Bell's vireo

Date of field work (mm-dd-yyyy): 04-24-2016

Comment about field work date(s):

OBSERVER INFORMATION

Observer: David A. Kisner

Affiliation:

Address: 1296 Ken Ave , Orcutt, CA 93455

Email: david.kisner@gmail.com

Phone: (805) 252-5036

Other observers:

DETERMINATION

Keyed in:

Compared w/ specimen at:

Compared w/ image in:

By another person:

Other: Identified by song

Identification explanation: Male sang 5 or 6 times initially and then 5 or 6 times 40 minutes later.

Identification confidence: Very confident

Species found: Yes **If not found, why not?**

Level of survey effort: Passive bird survey

Total number of individuals: 1

Collection? No **Collection number:**

Museum/Herbarium:

ANIMAL INFORMATION

How was the detection made? Heard singing

Number detected in each age class:

adults	juveniles	larvae	egg mass	unknown
1				

Age class comment: adult male - based on singing

Submitted: 04/24/2016 KIS16F0001 Page 1 of 3

Bird site use:

- [x] Nesting
- [ ] Rookery
- [ ] Nesting colony
- [ ] Burrow site
- [ ] Lek
- [ ] Non-breeding (over-wintering)
- [ ] Communal roost
- [ ] Other

Site use description:

What was the observed behavior? territorial but acting unpaired

Describe any evidence of reproduction: active singing

SITE INFORMATION

Habitat description: Fremont cottonwood-Red willow forest/arroyo willow-mulefat thickets

Slope: almost level

Land owner/manager: Private

Aspect:

Site condition + population viability: Good

Immediate & surrounding land use: Agriculture, light industrial, winery, open lands, golf course

Visible disturbances: non-native vegetation, bullfrogs, pedestrian trails

Threats: brown-headed cowbird, water quality, development

General comments: habitat looks excellent for vireo

MAP INFORMATION

ID	County	24K Quadrangle	Elev. (ft)	Latitude NAD83	Longitude NAD83	UTM E NAD83	UTM N NAD83	UTM Zone
	Santa Barbara	Solvang	330	34.60768	-120.20258	756518	3833097	10
1	**Public Land Survey**	**Feature Comment**						
	S T06N R32W 12	See attached map						

The mapped feature is accurate within: 100 m

Source of mapped feature: CNDDB online field survey tool

Submitted: 04/24/2016 KIS16F0001 Page 2 of 3

Mapping notes: Zaca Creek x Santa Ynez River Confluence is incorrect on CNDDB online field survey tool base map.

Location/directions comments: Male first heard singing at approximately 34.607000 x -120.203434 then moved upstream at least 200 meters. Heard 40 minutes later at approximately 34.606500 x -120.202300. See attachment

Attachment(s): LBVI map.docx, Detailed map of observation

Submitted: 04/24/2016 KIS16F0001 Page 3 of 3

Letter No. 9: Gordon R. Hensley, Gordon R. Hensley Environmental Services (on behalf of the Lompoc Valley Community Coalition), August 15, 2016

Response 9-1

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 9-2

Comment noted. Please refer to Topical Response No. 2, Biological Resources which addresses biological surveys and potential project related impacts on arroyo willow thicket. Further, it should be noted, during the public review comment period, additional surveys were conducted to determine presence/absence of southwestern willow flycatcher identified as likely to occur within the proposed Project area (see Appendix 2.1, Southwestern Willow Flycatcher Protocol Survey of the Final EIR). Protocol surveys were conducted on May 20, June 3, June 10, June 27, and July 5, 2016, to determine presence/absence for southwestern willow flycatcher, as well as to document any other observed species within the proposed Project site.

Please also refer to Response 2-1 and Response 2-10 which further address the proposed Project's specific mitigation measures, and potential impacts to sensitive status species or their habitat.

Response 9-3

Comment noted. Please refer to Topical Response No. 2, Biological Resources. Please also refer to Response 2-1 and Response 2-10 which further address the proposed Project's specific mitigation measures, and potential impacts to sensitive status species or their habitat. Please also refer to the Draft EIR, Section 4.3 Biological resources, which is supported by the CNDDB report which states a low likelihood of occurrence for the Least Bell's vireo given no previous CNDDB or eBird records documented occurrences within the proposed Project site and the nearby vicinity. Further, the species was not observed during any of the five proposed Project surveys.

Response 9-4

Please refer to Topical Response No. 2, Biological Resources and Topical Response No. 4, Indirect Biological Resource Impacts regarding indirect biological impacts. As discussed, proposed Project operation, noise levels, vibration, dust and lighting impacts would be temporary, and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

Please also refer to Response 2-16, 2-17, and 2-18 which further address indirect biological impacts.

Response 9-5

As noted in Section 4.8 of the Draft EIR (page 4.8-16), the proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application. Compliance with such requirements would reduce potential construction and postconstruction water quality impacts to less than significant.

In addition, please refer to Topical Response No. 3, Hydrology which addresses water quality issues, and Response 2-14 and 2-15, which addresses stormwater management.

Response 9-6

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Law Office of **Babak Naficy**

1504 Marsh Street
San Luis Obispo
California 93401
ph: 805-593-0926
fax: 805-593-0946

babaknaficy@sbcglobal.net

August 15, 2015

Via Email and U.S. Mail

Lucile Breese, AICP, 12
Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436
lbreeese@ci.lompoc.ca.us

RECEIVED

AUG 15 2016

Planning Division

RE: Lompoc Motorsports Project DEIR comments

I submit these comments on behalf of Lompoc Valley Community Coalition relative to the proposed Lompoc Motorsports Project Draft Environmental Impact Report ("DEIR"). As explained more fully below, the DEIR is inadequate and incomplete in many respects.

Stated Project Objectives are disingenuous and not likely achieved by the Project

Most of the items on this list cannot be considered valid objectives, however. The Project cannot achieve the goal of providing "compatible recreation opportunities adjacent to the Lompoc Airport" because the area is designated as open space or is otherwise within the area intended for airport-related development. Moreover, as explained more fully below, the proposed site is not suited for attracting large number of spectators because of the high danger of aeronautic accidents. 10-1 10-2

Another stated objective is "[reducing] illegal riding in Santa Ynez River bed and street racing." While this idea may have some "intuitive" appeal, there is no empirical evidence that construction of a motorsports complex would reduce illegal riding. The City has already providing a free racing arena which is almost used by residents and therefore has no effect on illegal riding. 10-3

According to the DEIR, another project objective is to provide for "ongoing recreational uses for skydiving and improve existing skydiving landing areas." The Project, as proposed, would make ongoing skydiving impossible by substantially reducing the skydiving landing areas. Accordingly, there is no evidence to show the proposed Project is mutually compatible with the existing skydiving operation. 10-4

Almost, comically, the DEIR claims the Project also intends to "redevelop underutilized lands that are in need of remediation and restoration along the Santa Ynez River." While the area may be "underutilized", the proposed Project will certainly not remediate or restore the area. Restoration and remediation implies the area would be returned to its original natural condition, but the Project proposes to pave over large segments of the open space there and replace the natural setting with a motorsports complex. 10-5

The DEIR claims the Project would "provide for the opportunity to implement mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project, including the restoration of approximately 7.1 acres of riparian vegetation." The City has been under an existing obligation to implement the mitigation associated with the Runway Extension Project, so to suggest the Project provides the opportunity to implement an existing obligation is absurd. In fact, the Project would make it impossible for the City to fulfill its obligation to implement this mitigation because the Project site substantially overlaps with the area that had been set aside for the Runway Extension mitigation. 10-6

The Project's untenable objectives prevent the DEIR from adequately analyzing Project Alternatives

The EIR must identify feasible alternatives that could avoid or substantially lessen the project's significant environmental impacts. (Pub.Res.Code §§ 21002, 21002.1(a), 21100(b)(4), 21150.) "A major function of an EIR 'is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official. An EIR's discussion of alternatives must include a discussion of a "no project" alternative to allow a comparison of the impacts of the project with the effects of not approving the project.'" (San Joaquin Raptor/Wildlife Rescue Center v. County Of Stanislaus (2007) 47 Cal.App.4th 713, 734; CEQA Guideline §15126.6(e)(1).)
The "EIR must explain why each suggested alternative either does not satisfy the goals of the proposed project, does not offer substantial environmental advantages[,] or cannot be accomplished." (Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1458.) The agency's infeasibility determination must be supported by substantial evidence in the record. PRC §21081.5 ; CEQA Guideline 15091(b). 10-7

> CEQA provides two "junctures" for findings regarding the feasibility of project alternatives. First, alternatives are determined to be potentially feasible in the EIR. (citation omitted.) Second, in deciding whether to approve the project, the decision maker determines whether an alternative is actually feasible.

(San Diego Citizenry Group v. County of San Diego (2013) 219 Cal.App.4th 1, 18.)
Here, the DEIR's identification of inappropriate and disingenuous project objectives has undermined the DEIR's ability to adequately analyze project alternatives. For example, the DEIR essentially rules out off-site alternatives because such alternatives would not fulfill the purported objectives of remediating the Project site or to provide an opportunity for the City to implement the Runway Expansion mitigation measures it was required to implement ten years. The discussion of the alternatives must therefore be revised after the City has identified reasonable and lawful Project objectives.

Aesthetics
Impact from lighting:
"Light emitted by on-site usage would not be substantially projected off the proposed Project site and would be confined to the internal boundaries of the proposed Project." 10-8

2

This is a questionable finding. The lighting proposed could be a hazard to pilots at night. This lighting may be an annoyance to neighborhoods, commercial areas, and surrounding areas well beyond the park. Figure 4.1-8 in the DEIR illustrates the projection of light from the proposed park.

It is the assumption of the Draft EIR that the light would be contained on site, but there is no sampling or evidence of that in the report. This statement from the Draft EIR is suspiciously conflicting "However, light emitted by on-site usage would not be substantially projected off the Project site and would be confined to the internal boundaries of the proposed Project." It is then further stated, "Sources of glare would include vehicles traveling to the proposed Project site and from the permanent maintenance and storage building and temporary structures. These statements demonstrated that the light escaping the site may cause a significant aesthetic impact. 10-8

Air Quality

The DEIR admits that the Project's operational impacts on air quality would be significant. The Project's operational impacts include VOC and NOx emissions from passenger cars travelling to and from the site, as well as the PM10 generated by drag racing and other OHV activities on the site.

The DEIR's analysis Project's criteria air emission is inadequate. The DEIR fails even to consider or discuss Fine Particulate Matter (PM2.5) emissions. As stated in the table entitled "Santa Barbara County Attainment/Nonattainment Classification Summary 2015" available on the APCD website at https://www.ourair.org/air-quality-standards, PM2.5 is recognized and regulated criteria pollutant. The DEIR must be revised to adequately quantify and analyze the significance of the Project's PM2.5 emissions. 10-9

The DEIR does not clearly and consistently analyze the significance of the Project's air quality emissions. DEIR Table 4.2-9 considers the Project's average daily emissions, including PM emissions. According to this table the Project average daily emissions fall just below the average daily threshold of PM10, which is 80 lb/day. The DEIR does not analyze the Project's average hourly PM10 emissions, or, as state above, the Project's PM2.5 emissions. Nor does the DEIR analyze Project's air quality impacts in light of Santa Barbara's failure to achieve attainment with California's PM10 standards.

The relevant portions of a table describing Santa Barbara County Attainment/Nonattainment Classification Summary 2015 is provided below. The complete table can be found at https://www.ourair.org/air-quality-standards

(see next page for table)

Particulate Matter (PM10)	annual arithmetic mean	20 $\mu g/m^3$	N	revoked	A
	24 hour	50$\mu g/m^3$	N	150 $\mu g/m^3$	A
Particulate Matter – Fine (PM2.5)	annual arithmetic mean	12$\mu g/m^3$	U	12.0 $\mu g/m^3$	U/A
	24 hour	—	—	35 $\mu g/m^3$	U/A

10-9

The DEIR's analysis of proposed mitigation measures is wholly inadequate. The sole operational mitigation discussed in the DEIR is MM 4.2-2 through 4.2-4, which purport to limit the number of OHV vehicles, number of OHV races per hour, and the length of OHV events in order to reduce emissions. The DEIR makes no attempt to discuss the feasibility of these mitigation measures, but states that if these measures are later determined to be infeasible with "then localized emission impacts would be considered adverse, significant, and unavoidable." To be adequate, the DEIR must analyze the feasibility of these proposed mitigation measures by first identifying the factors that may affect their feasibility, and then marshalling facts to determine whether these measures can be feasibly implemented. If it the DEIR concludes these mitigation measures are infeasible, the DEIR must propose alternative measures to address the Project's significant air quality impacts.

4.2-1

The motorsports operator shall limit the number of OHV vehicles, OHV races, and length of OHV events based on the anticipated weekend events for concurrent operation of the Oval Cart Track and Stadium Cross events in accordance with the following requirements:

-Restrict the operation of the oval cart track events to 2 races per hour for 6 hours each weekend day.

-Restrict the operation of stadium cross events to 2 races per hour for 6 hours each weekend day.

10-10

These restrictions conflict with the Business Plan the Foundation submitted to the City. The EIR must discuss these inconsistencies and analyze feasibility of these mitigation measures in light of the inconsistencies.

4.2-3

When the Oval Cart Track and Stadium Cross events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV

10-11

4

events based on the anticipated weekend events for only the Enduro Cross event in accordance with the following requirement:

-Restrict the Enduro Cross tract events to 2 races per hour for 6 hours each weekend day.

10-11

These restrictions conflict with the Business Plan the Foundation submitted to the City. The EIR must discuss these inconsistencies and analyze feasibility of these mitigation measures in light of the inconsistencies.

4.2-4

When the Oval Cart Track and Stadium Cross events or the Enduro Cross Only events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Motor Cross event in accordance with the following requirement:

-Restrict motorcross events to 18 vehicles with 1 race per hour for 3 hours each weekend day.

10-12

This will have a negative effect to the financial benefit to the airport. These restrictions conflict with the Business Plan the Foundation submitted to the City. The EIR must discuss these inconsistencies and analyze feasibility of these mitigation measures in light of the inconsistencies.

Air Quality Mitigation Measures

Significant and unavoidable for VOC and NOx.

This finding makes the project financial feasibility and viability questionable.

10-13

Hazards and Hazardous Waste

The Project places hazards in the area of the Santa Ynez River. The potential of contamination is greatly increased because of the amount of hazardous material that will be brought in, used on site, the number of people being exposed to these materials, as acknowledged in the EIR with the statement *"Further, the transportation of hazardous materials to and from the site may potentially impact proposed Project site visitors and residents located along roadways used for delivery."*

10-14

The Project site does not contain any known ISTs, however, grading and excavation of the site may uncover any unknown USTs. Therefore, impacts to the release of hazardous materials would be potentially significant. A subsurface geophysical survey should be done before the project is considered for approval and the EIR is certified.

Hydrology Water Quality

In that this Project is planned for construction in the "floodplain," will this be permitted by those agencies that have regulatory authority of land and water in the area of the Santa Ynez River. i.e. requirements for Lake and Streambed Alteration Agreement, permits for detention/retention basins and other required permits? (see Project Impacts)

These are noted in the Project Impacts:

10-15

5

Compliance with the appropriate National pollution Discharge Elimination System (NPDES) requirements, implementation of a Storm Water Pollution Prevention Plan (SWPPP) with BMPs or the submittal of an Erosion Sediment Control Plan would reduce potential water impacts to less than significant.

As stated above, the depth of the proposed retention basins will not be sufficient to assure no runoff from the Project site. The depth of one (1) inch and three and one half (3 ½) inch is questionable in retention capacity and in the event of a flood this could potentially allow hazardous materials to leak and runoff into the river area as well as exacerbating flooding.

10-15

An image from the DEIR illustrates the area of the 100 year floodplain. The Project site is completely within the 100 year floodplain. By encroaching into the floodplain, without constructing other protections, this may cause further erosion and flooding on the site, near and down river from the Project site. Consequently, this study needs to address flooding and protections that may need to be constructed beyond the Project site to prevent further damage to the river. (Reference Santa Ynez River Bank Protection Evaluation, City of Lompoc, January 20, 2011). This is mentioned in the Notice of Preparation comment letter from the Environmental Defense Center, January 11, 2016 on page 11. This EIR needs to address issues in the final report "An Assessment of Potential Restoration Actions to Enhance the Ecological Functions of the Lower Santa Ynez River Estuary" with regard to the aggregate impacts the Motorsports Park will have on the lower area of the River. The DEIR does not address these impacts.

Land Use and Planning

The DEIR's analysis of the Project's compatibility with applicable land use and planning regulation fails to admit that as proposed, the Project would be in violation of the applicable California land use regulation. According to the Airport Master Plan, as amended, the California Airport Land Use Planning Handbook defines six safety zones around airports. Master Plan p.9-11 to 9-12. The proposed Project is proposed on land to the north of the airport that is classified as Zone 6, "Traffic Pattern Zone." According to the Master Plan, the Traffic Pattern Zone must reflect actual traffic patterns flown at the airport. "As described above, [avian] traffic is north of the runway; therefore, the traffic pattern zone [at Lompoc Airport] is principally north of the airport." Master Plan at 9-11. Figure 9-4, shows the Traffic Pattern Zone to the north of the Lompoc Air Port covers the entire area proposed for the Project.

10-16

Caltrans Airport Compatibility Planning Guidelines are reproduced in the Airport Master Plan as Appendix E. According to these Guidelines, which embody state law, "risk concern [in Traffic Zone] primarily is with uses for which potential consequences are severe." Master Plan at 9-45. In light of this concern, the State Guidelines directs that "outdoor stadiums and similar uses with very high intensities" must be categorically prohibited. Ibid.

Accordingly, the Project must be denied because it includes an outdoor stadium with 1250

capacity. This would be in addition to the crowds attracted to the outdoor off-highway tract. The Air Port Commission should therefore find that the proposed Racetrack is inconsistent with and prohibited by the applicable regulations and should therefore be denied by the City of Lompoc.

The DEIR claims because a Draft Airport Land Use Compatibility Plan (ALUCP) is currently being prepared, the project is subject to a 1993 ALUCP. DEIR at 4.9-14. Quoting the 1993 ALUCP, the DEIR claims the Project is proposed in Safety Zone 3, which according to the DEIR, is the least restrictive zone where all development can be approved by the Airport Land Use Commission. Ibid. According to Map 4.9-6, the proposed Project is located within Safety Area 3. 10-16

The DEIR entirely ignores the 2011 Airport Master Plan Update, or the Caltrans Safety Compatibility Guidelines, which according to the Master Plan Update, were published by the Department of Transportation , Division of Aeronautics, in January of 2002, providing guidance for developing airport compatibility plans. See, Lompoc Airport Master Plan Update, 2011, at 9-10. Thus, the DEIR does not list the Caltrans Safety Compatibility Guidelines as an applicable plan. The DEIR must be revised to consider the Project's compatibility with the Airport Master Plan and the Caltrans Safety Compatibility Guidelines.

The DEIR acknowledges that the proposed site for the Project was previously designated as a mitigation site by the City in connection with the Airport Runway Expansion Project. According to the DEIR:

> The City has implemented that replanting project twice; both were completed but the replanted flora did not survive. The City may still be obligated to complete the Runway Expansion Mitigation pursuant to a Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife. The details of the mitigation requirements are discussed in Section 4.3, Biological Resources. DEIR 4.9-18. 10-17

The DEIR's discussion of the City's failed attempt to comply with its obligation to implement the mitigation required in connection with the Runway Expansion Project is disingenuous and flawed. To begin with, the suggestion that the replanting project was ever completed is incorrect and not supported by the evidence.

The City never complied with the mitigation conditions imposed by its Streambed Alteration Agreement (SAA). According to the March 2003 Report, entitled, LOMPOC AIRPORT EXPANSION PROJECT REPORT OF COMPLIANCE WITH CONDITIONS OF STREAMBED ALTERATION AGREEMENT 5-2001-0252 REVEGETATION RESULTS, Condition 47 of the SAA required the City to ensure "Irrigation [is] to be provided when precipitation is inadequate to ensure survival of plantings. Irrigation to be provided for at least two years. All plants must survive for at

least three years after irrigation stops." According to the same Report, "the plantings were watered during the following time periods: Feb. 4-7, April 10, and April 16-17, 2003. No supplemental watering was done after April 17, 2003. Based on the low survival of the planted willows and container plants, it appears that the amount of irrigation provided was inadequate." The Report establishes that the City did not come close to fulfilling its mitigation obligations.

The DEIR therefore is patently misleading and inaccurate when it claims the City fulfilled its obligations but the plants mysteriously did not survive. The DEIR admits that the City was refunded over $75,000 by the contractor hired to perform the replanting, but does not explain that this was because the contractor failed to comply with the terms of the mitigation, or that the contractors failure is imputed to the City. The DEIR must be revised to accurately explain that the company hired by the City to implement the replanting mitigation failed to comply with the terms of the mitigation, and that the City subsequently has failed to take any action to fulfill its obligations under the terms of the SAA and the Project's conditions of approval. 10-17

The DEIR claims that despite the failure of the replanting mitigation measure, the City **may** be still be obligated to implement the required mitigation. The DEIR fails to explain why the City's may no longer be under a legal obligation to implement this mitigation. Thus, for example, the DEIR fails to suggest that the mitigation may no longer be feasible. DEIR must also be revised to clearly explain that the City is still legally obligated to implement the replanting mitigation measures.

The DEIR claims that the "Loss of the 7.1 acres on site would preclude the City from again implementing what may still be a required mitigation. If that mitigation is still required, then, that would result in a significant impact." DEIR 4.9-36. This statement implies that the City is free to ignore its previous mitigation obligation by simply considering this failure a significant impact. This is not a correct statement of the law. The City is currently and has been under a legal obligation to fulfill the conditions of the SAA. The City may not simply ignore these obligations by approving a different Project on the same site it previously agreed to use for replanting mitigation. "The purpose of these [monitoring] requirements is to ensure that feasible mitigation measure will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." Lincoln Place Tenants Ass'n v. City of Los Angeles (2007) 155 Cal.App.4th 425, 446, as modified on denial of reh'g (Oct. 10, 2007). The City may not approve the current project unless it is successful in modifying the mitigation measure by demonstrating that these mitigation measures are infeasible. Id., at 449.

The DEIR claims that SBCAG has determined the proposed Project does not require a determination of consistency by the ALUC because the Project does not require a General Plan Amendment. A determination that the Project is not subject to a consistency determination by the ALUC is not consistent with state law, which provides that the powers and duties of an airport land use commission include: "(a) To assist local agencies 10-18

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in ensuring compatible land uses in the vicinity of all new airports and in the vicinity of existing airports to the extent that the land in the vicinity of those airports is not already devoted to incompatible uses. [¶] (b) To coordinate planning at the state, regional, and local levels so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare. [¶] (c) To prepare and adopt an airport land use compatibility plan pursuant to Section 21675. [¶] (d) To review the plans, regulations, and other actions of local agencies and airport operators pursuant to Section 21676." Pub. Utilies Code § 21674. Accordingly, the ALUC must review the Project's compatibility of the safe operation of the airport. 10-18

The DEIR also claims that

> the ALUP's goals are to: preserve navigable airspace around airports, **provide general safety of people and property around airports**, and mitigate airport noise impacts. Mitigation measures have been identified to reduce impacts by restricting structures' height, eliminating potentially hazardous sky dive drop zone areas, and restricting skydive operation times so proposed land use conflicts associated with the proposed Project do not occur. Therefore, the proposed Project would not conflict with the ALUP's goals and policies, and impacts would be less than significant. DEIR at 4.9-33 (emphasis added.)

The DEIR's claim that the Project, with the proposed mitigation, would not conflict the ALUP's goals and policies is not supported by the evidence. The proposed Mitigation cannot reduce the risk of catastrophic accidents in the vicinity of the Airport. It is precisely because of this risk that the Caltrans Safety Guidelines recommends prohibition of stadiums and group recreational areas in the vicinity of airports. Accordingly, the Project does conflict with the ALUP's goal of providing general safety. 10-19

Finally, the DEIR claims that because the ALUP update has not been finally adopted, the Project is not required to comply with the proposed safety zone requirements. This statement is inaccurate as it fails to acknowledge that the Caltrans Safety Guidelines already exist and apply to the Project. Therefore, regardless of whether, as the DEIR claims, State law authorizes the City to override the ALUCP, it does not follow, as the DEIR claims, that the proposed Project is consistent with the ALUCP. The City's override of ALUCP regulation does not make the Project "consistent" with the ALUCP's adopted safety regulation.

4.9-2

See DEIR for text

Because travel trailers, recreational vehicles and semi trucks with trailers have an average height of 10 feet or more without air conditioners, roof racks, roof top carriers, and other rooftop accessories, the high limitation may well require the second option to assure all vehicles can access that area of V Street. 10-20

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4.9-3
See DEIR for text
This section needs to be addressed in the Final EIR as to how this educational program will be implemented. 10-21

Alternatives Analysis
The DEIR's alternatives analysis is fundamentally flawed because, as explained above, the list of project objectives is artificially narrow and designed specifically to limit the alternatives analysis.

The DEIR's analysis of alternative 2 (existing zoning) is inadequate and in violation of CEQA. According to the DEIR, this alternative would result in similar air quality impacts as the proposed Project. This analysis fails to account for the fact that Alternative 2's operational emissions are the product of economical growth, while the transportation emissions from the Project would be largely attributed to recreation. The economic growth that would result from the implementation of Alternative 2 is partially anticipated by SBCOG economic projections, while the Project is not.

The DEIR's analysis of the relation between Alternative 2 and Project Objectives is disingenuous and flawed. According to the DEIR, this alternative fails to accomplish the following project objectives: 10-22

- Provide compatible recreation opportunities adjacent to the Lompoc Airport, including a variety of motorsports activities for both professional and amateur motorsport users.
- Reduce illegal riding in Santa Ynez River bed and street racing.
- Provide for ongoing recreational uses for skydiving and improve existing skydiving landing areas.
- Provide increased economic activity to Lompoc-based businesses from events at the completed Project through the use of the surrounding public and private recreation areas and businesses by patrons and attendees.

As explained already, there is no evidence that the Project would reduce illegal riding in the River bed. More importantly, the DEIR claims this Alternative would not result in any economic benefits, but also claims that it would result in "an increase in approximately 1,462 daily trips per day when compared to the proposed Project." The DEIR also states that the site would likely by used for a non-profit or non-governmental agency. The DEIR fails to explain how the trip generation was calculated, or what type of entity was assumed for this site. Regardless, it would seem that any type of entity that would occupy this space would contribute to the local business climate. The DEIR is therefore inadequate in that it fails to describe in sufficient detail its assumptions for Alternative 2.

Storm water management and flooding

The DEIR's analysis of the storm water and flooding management is inadequate and not supported by any substantial evidence. The DEIR simply claims that the two proposed 10-23

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onsite infiltration areas would be sufficient to ensure no stormwater ever leaves the site. This claim, however, is not supported by calculation or analysis. There is no indication of what volume of stormwater would be expected to be generated by the Project, and what if any stormwater would move through the Project originating outside the Project. It is not clear who these infiltration basins can capture all stormwater regardless of the size of the storm. Moreover, the DEIR does not include or discuss any mechanism for removal of debris and sediment from the basins, which are only 1 to 3 inches deep. These basins will fill with debris and sediment very quickly, losing all capacity to contain stormwater. 10-23

Water Service

The water service mitigation measure conflicts with the City's current policy of conservation and the City raising water rates for 5 years that began in 2013. Also, there are potential biological impacts on riparian communities and the DEIR does not address this issue. 10-24

Sewer

Because the Project is planned to be permanent at the proposed site of the Lompoc Airport, the operation of the park with portable restrooms will be a continuous management issue. By not having direct water and waste water lines, this will give the park the appearance of a campground. There is the potential of leakage into the river with portable restrooms and this should be carefully evaluated as to the health and environmental consequences to the riparian habitat. 10-25

Solid Waste

The Project will add additional debris and waste to Lompoc Sanitary Landfill. This is the estimated amount in the DEIR: "the proposed Project would generate approximately 17.2 tons of construction and demolition debris which would be disposed of at the City of Lompoc Sanitary Landfill." The operation of the park is estimated to: "generate approximately 138.1 tons of solid waste per year, which would be sent directly to the Lompoc Sanitary Landfill." This essentially counters many years of citizens decreasing waste to the landfill. How will the developer provide and maintain large waste and recycling containers to be out of sight and preventing the waste from entering the river area? 10-26

Dry Utilities

The proposed Project would use fifteen (15) 15' high light poles on the Project site. The EIR needs to address how these light poles would be removed from the flood plain in the event of a flood. 10-27

Conclusion

All of the foregoing issues should be addressed before the Project is considered for approval and the EIR is certified. 10-28

Babak Naficy

Babak Naficy, Attorney at Law

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Letter No. 10: Baback Naficy, Attorney at Law, Law Office of Babak Naficy (on behalf of the Lompoc Valley Community Coalition), August 15, 2016

Response 10-1

The City's General Plan Land Use Element currently designates the entire proposed Project site as Community Facilities (CF), as shown in Figure 4.9-3, Existing City Land Use Map. The General Plan describes the purpose of Community Facilities as one that provides areas that meet public service, educational, recreational, social, and cultural needs for the Lompoc Valley residents.

Response 10-2

Please refer to Topical Response No. 1, Airport Safety, and Topical Response 5, Land Use Compatibility, which address safety issues including those involving increased number of spectators in proximity to the airport, and relative Airport's designated Safety Zones and the allotted distance between the recreational park—specifically the grandstands—and the landing/takeoff area

Response 10-3

As stated in Section 3, Project Description of the Draft EIR, one of the proposed Project objectives is to reduce illegal riding in the Santa Ynez River bed and street racing. However, as with any illegal activities, one cannot fully preclude their occurrence.

Response 10-4

Concerns were raised regarding how the proposed Project would affect the existing skydiving activities and drop zone. Please refer to Topical Response 8, Skydive Landing Zone, which addresses concerns regarding the Project's potential impacts to the existing operations of Skydive Santa Barbara (SDSB), located at the Lompoc Airport.

Response 10-5

Comment noted. As stated in the Draft EIR Section 3.0, Project Description, the proposed Project would develop an existing area that consists of an abandoned industrial site that includes dirt roads, former building slabs (approximately 26,000 square feet (0.6 acres), debris from prior uses, potentially up to four underground storage tanks (UST's), and vegetation; currently, a small portion of the proposed Project site is used as a skydiving landing area. Prior uses consisted of a succession of businesses, including sand and gravel operations, an asphalt plant, metal fabrication, a roofing company, scrap metal processing, and contractor yards.

Response 10-6

Please refer to Topical Response No. 6, Mitigation Area which addresses the 7.1 acre mitigation area, and which also states the City remains obligated to complete the Runway Expansion Mitigation pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

Response 10-7

Please refer to the Draft EIR Section 5, Alternatives, Topical Response 7, Noise, and Response 2-19 which further address Project alternative analysis.

Response 10-8

Please refer to Topical Response 1, Airport Safety, which addresses airport safety and lighting and project compatibility with the ALUP, and also refer to Topical Response 4, Indirect Biological Resource impacts which also addresses potential project related lighting impacts.

Response 10-9

As discussed in **Mitigation Measure MM 4.2-1** in Section 4.2, Air Quality, of the Draft EIR, a Fugitive Dust Control Plan shall be prepared and submitted to the City and Santa Barbara County Air Pollution Control District (SBAPCD) for review and approval before the proposed Project's operation if it is approved. Measures within the Fugitive Dust Control Plan include, paved on-site access roads extending from George Miller Drive and V Street, open and riding trail areas limited to 14 off-highway-vehicles (OHVs) per hour and the requirement all ground surfaces within OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent. The Fugitive Dust Control Plan would control emissions of airborne particulate matter to ensure the levels are below the 8 $\mu g/m^3$ SBAPCD threshold. Dust impacts to wildlife species were determined to be less than significant.

Please see responses to Comment letter 8 from the Santa Barbara County Air Pollution Control District.

Response 10-10

Section 15131, Economic and Social Effects, of the State CEQA Guidelines, states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR because there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 10-11

Please refer to Response 10-10.

Response 10-12

Please refer to Response 10-10.

Response 10-13

Please refer to Response 10-10.

Response 10-14

Please refer to Response 2-14, 2-15, and Topical Response 4, Indirect Biological Resource Impacts. Those responses address water quality and hazardous materials.

Response 10-15

Please refer to Topical Response No. 3, Hydrology, which addresses the proposed Project's potential impacts to stormwater runoff and groundwater pollution. Comments requested information on details pertaining to the infiltration basins located on the proposed Project site and where any potential flooding or runoff would be directed. In addition, comments were received on the proposed Project's location within the 100-year Flood Hazard Area and how that location may potentially impact motorsports events and structures on site.

Further, the Draft EIR identifies the following mitigation measure to reduce impacts related to the biological resources:

MM 4.3-1 To offset impacts to arroyo willow thicket on site (14.5 acres), off-site mitigation will be implemented at a 5 to 1 ratio for a total of 72.5 acres (14.5 acres of impacted arroyo willow thicket at a 5 to 1 ratio equals 72.5 acres). This acreage includes 0.5 acre of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted, the mitigation for the Runway Expansion Project was not successful so no credit is given for that mitigation.

Mitigation may be conducted adjacent to the Project in remaining arroyo willow thickets, and/or at appropriate off-site City-owned properties. Should off-site locations be considered, they should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River.

Mitigation shall be provided for through the development of a Restoration and Mitigation Plan (Plan). The Plan will compare the performance of the mitigation area against the recommended performance criteria to identify any shortcomings or problems in the mitigation area. The Plan will include methods for evaluation of plant establishment, vigor, and health, and for evaluating the percent cover by native and non-native plant species. In addition, the Plan will include specific details on a planting palette invasive species removal and methods for planting and irrigation. A preliminary conceptual planting palette and schedule of success criteria (is included in the mitigation). The planting palette and success criteria may change and will be adapted to site specific conditions when a final off-site mitigation area is selected. The Plan should provide for quarterly monitoring visits during the first year, biannual visits during the second and third years, and annual visits during the fourth and fifth years.

The Project Plan will be developed in consultation with City of Lompoc and submitted to the CDFW for review and concurrence at least 30 days prior to beginning construction.

Please also refer to Response 2-9 which addresses Santa Ynez River Topical Response 2-5, Land Use Compatibility.

Response 10-16

Please refer to Response 1-1, which states the City recognizes the role of the California Department of Transportation, Division of Aeronautics in airport-related compatible land use issues and acknowledges that the *California Airport Land Use Planning Handbook* published by the Division of Aeronautics should be utilized as a resource in the preparation of environmental documents for projects within airport comprehensive land use plan boundaries.

In the case of the Lompoc Airport, and to reduce the risk of airport-related safety hazards, land uses and development proposals near the airport are reviewed by the Airport Land Use Commission (ALUC) for consistency with the Santa Barbara County Airport Land Use Plan. The Santa Barbara County Airport Land Use Plan is consistent with the consideration of land use compatibility issues outlined in the *California Airport Land Use Planning Handbook*. According to the most recent Airport Land Use Plan and the draft plan currently being prepared, the existing and future land uses associated with the proposed project around the airport are considered safe land uses.

The Draft EIR addresses concerns related to the placement of uses in the various safety zones identified by the comment in Topical Response No. 5, Land Use Compatibility, and Topical Response No. 1, Airport Safety.

Further, a Draft Airport Land Use Compatibility Plan (ALUCP) is currently in preparation; however, because it is only in draft mode and has not been officially adopted, regulatory compliance is not applicable. Therefore, for the purposes of this evaluation, the proposed Project falls under the jurisdiction of the existing ALUP's goals and policies.

Response 10-17

Please refer to Topical Response No. 6, Mitigation Area, which addresses issues pertaining to that mitigation area, including its proposed location and the agencies responsible for the 7.1-acre mitigation area.

Approximately 7.1 acres of land on the proposed Project site has been previously designated for the replanting of vegetation and mitigation project from the Lompoc Airport Runway Expansion. That mitigation effort was an obligation of the City pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW).

The Draft EIR provides a discussion of the mitigation site which was required as part of the Runway Extension Project in both Section 4.3 Biological Resources, and Section 4.9, Land Use.

As discussed in Section 4.9 of the Draft EIR, implementation of the proposed Project would preclude the City from again implementing that 7.1 acre mitigation in the area previously identified for that purpose, and could, therefore, result in a significant impact.

The Draft EIR identifies the following mitigation measure to reduce these impacts:

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

Response 10-18

Lompoc Airport is under the purview of the Santa Barbara County Airport Land Use Plan (ALUP) which was adopted in 1993 and is the current, primary regulatory measure for the Lompoc Airport. The Santa Barbara County Association of Governments (SBCAG) serve as the Airport Land Use Commission (ALUC). SBCAG, as the ALUC, provided advisory comments for the proposed Project and scope of the environmental review in relation to the adopted 1993 ALUP.

As noted in the Draft EIR Section 4.9, Land Use (see page 4.9-32), SBCAG, acting as the ALUC, has reviewed the proposed Project as part of the Notice of Preparation (NOP) process, and provided comments to the City in its letter of December 22, 2015. At that time, the SBCAG noted that, because

the proposed Project is only seeking a Conditional Use Permit (CUP), and only requires discretionary permit approval, and it does not involve a General Plan amendment or rezone, a determination of consistency by the ALUC would not be required.

Response 10-19

Please refer to Response 10-16.

Response 10-20

Please refer to Topical Response 1 Airport Safety, which addresses airport designated safety zones and also addresses vehicle height restrictions.

Response 10-21

Page 4.9-2-3, Land Use and Planning, of the Draft EIR pertains to Project area surrounding land uses.

Response 10-22

Please refer to the Draft EIR, Section 5.0, Alternatives, Page 5.0-15 which states, "For purposes of analysis, the buildable square footage for the structure would be approximately 50 percent of the allowed development area, or approximately 7.6 acres in size or 331,000 square feet. The assumed trip generation rate is that of an Office Park, or approximately 11.42 weekday trips per 1,000 square feet of floor area. Accordingly, this Alternative would generate approximately 3,700 daily trips with 566 trips during the AM peak hour and 490 trips during the PM peak hour." That assumption was based on ITE Trip Generation Rates Manual, 8th Edition.

Also according to CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient "to allow meaningful evaluation, analysis, and comparison with the Proposed Project." Therefore, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide decision makers with perspective and a reasoned choice among alternatives to the proposed Project.

As stated in Section 3.0, Project Description of the Draft EIR, one of the proposed Project's objectives is to reduce illegal riding in the Santa Ynez River bed and street racing. However, as with any illegal activities, one cannot fully preclude their occurrence.

Additionally, please refer to Response 10-10.

Response 10-23

Please refer to Topical Response No. 2, Biological Resources, Topical Response 4, Indirect Biological Resource Impacts, Topical Response 3, Hydrology, and responses provided in comment letter 2, Fish and Wildlife Services.

Response 10-24

The analyses contained in the Draft EIR indicates water supply and service impacts would be less than significant, and as such, no mitigation measures would be required.

The Draft EIR does address potential biological impacts on riparian habitat. Please refer to Section 4.8, Biological Resources. Also, please refer to Topical Response No. 2, Biological Resources and Topical Response 4, Indirect Biological Resource Impacts.

Response 10-25

Comment is noted. The commentor expressed a personal opinion regarding the perceived appearance of the proposed Project and does not pertain to CEQA, or the analyses contained in the Draft EIR. As such, no further response is warranted.

Please refer to Topical Response No. 2, Biological Resources, Topical Response 4, Indirect Biological Resource Impacts, Topical Response 3, Hydrology, and responses provided in comment letter 2, Fish and Wildlife Services.

Response 10-26

As stated in the Draft EIR, Section 4.14, Utilities and Service Systems, "As required by the City, the proposed Project would implement a waste diversion program in an effort to reduce solid waste impacts on existing landfill capacities, similar to the state's waste diversion goal of 75 percent as identified by state law (SB 1016 and AB 939). The proposed Project would be required to divert up to 75 percent of its operational solid waste by 2020. Since the proposed Project would implement mitigation similar to regulations set forth in the CIWMP and other local and state regulations, impacts would be less than significant."

Further, prior to implementing the proposed Project, if it is approved, and issuance of grading permits, the Applicant would be required to submit a Solid Waste Management Plan (SWMP) to the City for review and approval.

Additionally, please refer to Topical Response No. 2, Biological Resources, Topical Response 4, Indirect Biological Resource Impacts, Topical Response 3, Hydrology, and responses provided in comment letter 2, Fish and Wildlife Services.

Response 10-27

The proposed Project's anticipated 10 permanent light poles would be permanent and would not be removed.

Response 10-28

Comment noted. Individual responses have been provided.

The Lompoc Valley Parks, Recreation and Pool Foundation
601 East Ocean Avenue Suite #17
Lompoc CA 93436

RECEIVED

AUG 15 2016

Planning Division

August 15, 2016

Lucille Breeze
City of Lompoc
100 Civic Center Plaza
Lompoc Ca. 93436

Attached are our comments regarding the Motorsports Park Environmental Impact Report:

1. Two pages of comments with a macro view of Impact Report comments.

2. Seventeen pages of specific comments and requests for Corrections.

3. Two pages of corrections to phrasing, words and typographical errors for which no response is necessary other than acknowledgement of receipt.

4. A flash drive containing a revised plan set in response to comments and corrections from the EIR document. If possible these updated Plan Sheets should be substituted for the Plan Sheets used in the Draft Document.

Please feel free to contact us for any needed clarification of the data supplied.

Sincerely

Carl Creel
Motorsports Park
Committee Chairman

Sincerely

John H. Linn
Foundation
Chairman

A California Nonprofit Public Benefit Corporation, created to support and encourage quality recreation for the residents of the Lompoc Valley.

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LOMPOC MOTORSPORTS PARK
DRAFT EIR APPLICANT COMMENTS

Pages 1.03, 3.0-1; Table 2.0-1 (Mitigation Measures 4.3-7 and 4.9-3): The role of the City, as Lead Agency, should be clarified in regard to its involvement under the MOU and the previous airport runway project (for which biological mitigation was not successfully accomplished). Unless expressly agreed upon among and between the parties to the MOU, mitigation measures should not be imposed on the Applicant over which it either has no control or for which others are responsible. This includes Mitigation Measures 4.3-7, 4.9-3, 4.3-5, 4.9-6, 4.9-7 and 4.9-8. 11-1

Pages 2.0-5 through 2.0-9: Based on the comments that follow, we do not believe that the proposed project will result in adverse unavoidable impacts. As such, Alternative 1 is not the environmentally superior choice insofar as it would forego environmental mitigation for biological impacts attributable to the previous runway expansion, along with hazardous materials remediation and skydiving risks. This clearly separates the two projects: (i) the Applicant should not be straddled with mitigation above and beyond that which is attributable to the Lompoc Motorsports Park; and (ii) the proposed project is the environmentally superior alternative. 11-2

Pages 1.03, 3.0-1, 3.0-2, 4.3-35 and 4.9-18: Please clarify the roles and relationships under the MOU, in particular, responsibility for mitigation measures. In particular, please discuss the status and current responsibilities for completing the unsuccessful biological mitigation attributable the previous runway improvements. In addition, please explain the role of the California Department of State Parks and requirements (if any) that flow from the grant agreement. Please also update the project objectives to incorporate the promotion of overarching State recreational goals under the OHMVR grant program. 11-3 11-4

Page 3.0-5: Please clarify the location and user statistics for the existing Kids Moto Fun Park. Have associated impacts from this existing facility been applied against environmental effects associated the proposed project (i.e., traffic and air quality)? If not, appropriate adjustments should be made in the baseline analysis. The same holds true for any other existing uses and activities located elsewhere on the site that will be replaced or removed. 11-5

Section 4.2; Page 4.2-19; Tables 4.2-9, 4.13-4 and 4.13-5: The air quality section evaluates emissions from a variety of site-specific and non-point (offsite mobile) sources. According to the DEIR traffic engineer, the overwhelming majority of trips to the project site are attributable to local residents (Figures 4.13-4 and 4.13-50). Insofar as the project is not growth inducing (Section 7.1) and will not (in and of itself) add population to the area, the assignment of emissions from local residents effectively double counts what has already been considered in the City's General Plan Update EIR. As such, please recalculate emissions and discount effects that are attributable to the resident population. As discussed in other comments below, please also discount emissions attributable to patrons who presently attend events elsewhere, unlawful ORV use of the Santa Ynez River, on-site activities that will be eliminated, and patron use of alternative transportation modes. 11-6

Tables 4.2-2, 4.2-6 and 4.2-9; Pages 4.2-24 through 4.2-27: Please explain the relationship between SCCAB attainment status and thresholds of significance used for purposes of CEQA. Insofar as the SSCAB is non-compliant with Ozone and PM10 standards, how can any project be deemed "insignificant" regardless of how much (or little) emissions they might produce? Insofar as the General Plan Update EIR has concluded adverse unavoidable impacts to air quality, shouldn't the Plan's adoption of overriding considerations be applicable to the project since the land use proposed is consistent with the Plan? 11-7

Appendix 4.13; Pages 4.2-19, 4.2-20 and 4-13.8: Please clarify the methodology by which trip generation and distribution has been assigned to the proposed project (i.e., persons per vehicle, origination of trips [local vs. regional] and length of trips). Is there empirical data to substantiate these assumptions, and if not, on what basis have these assumptions have been made? What consideration, if any, has been given to offsetting trip reductions for patrons who presently attend events elsewhere, unlawful ORV use of the Santa Ynez River, current on-site activities that will be eliminated, and patron use of alternative transportation modes? 11-8

Page 4.2-31: Please explain why mobile emissions from the proposed project cannot be calculated based on future vehicular control technologies and regulatory benchmarks over time? Although the proposed project may have short-term impacts at point of buildout, compliance is conceivable over time due to legislative mitigation already in-place. What about factoring the project's implementation timeframe into the assessment of emissions? In this regard, please note that: (i) the construction time for the OHV park is 3 to 12 months; (ii) there will be a break in construction between the OHV and drag strip for a period of approximately two years to allow for fund raising; and (iii) the length of time required for construction of the drag strip is between 6-12 months. 11-9

Page 4.2-35; Mitigation Measures 4.3-6 and 4.3-7: Please explain why the Applicant should be held responsible for biological mitigation that the City failed to complete as part of a wholly separate and unrelated project (i.e., runway expansion). Insofar as off-site mitigation will entail property that is not under the Applicant's ownership (72.5 acres of restoration vs. a 38 acre project site), coupled with the failed re-vegetation efforts of the City on the project site itself, please discuss the possibility of a payment into a "mitigation bank" (expressly restricted to re-vegetation and administered by an independent third party; e.g., The Land Trust for Santa Barbara County). 11-10

Page 4.9.17; Mitigation Measure MM 4.9-4: Must a DZ be provided by the Airport by virtue of receiving federal funds and please elaborate on the current non-conforming condition of the existing DZ (e.g., if the proposed project is not approved, what are the ramifications [safety and legal] for continued use of a non-compliant landing zone)? What options are possible in restricting days and times of skydiving without running afoul of federal requirements (if any) while taking into account the current adopted Airport Master Plan that limits the number of turbo prop aircraft landing/takeoffs to a maximum of two per day? 11-11

Page 4.9.35: If the proposed DZs are acceptable according to FAA Guidelines, what standards (or empirical evidence) are used to conclude that safety risks might result from the new locations? Please provide the evidentiary basis for concluding that "cutaways" or faulty chutes could comprise airspace safety (and how does this analysis compare to the existing DZ)? Was the existing DZ acceptable under the FAA Guidelines and what difference is there between the existing and new easterly location? If the existing DZ is not currently acceptable under FAA Guidelines, could it be concluded that there would be a significant unavoidable adverse impact if the proposed project was NOT approved? 11-12

Pages 4.13-1 and 4-13-8; Tables 4.13-4 and 4.13-5; Figures 4.13-4 and 4.13-5: The traffic analysis referenced in Appendix 4.13 is not included as part of the EIR documentation posted on the City's website. Consequently, it's not possible to determine whether the assortment of methodology questions discussed above are adequately addressed. As an example, how have alternative traffic modes been factored into the analysis of traffic and mobile emission impacts attributable to the proposed project? Please see also explain the evidentiary basis for distribution assignments appearing in Figures 4.13-4 and 4.13-5, as well as the length of travel associated with local and regional trips. 11-13

Pages 5.0-9 through 5.0-41; Table 5.0-1: Please update the narrative in Section 5 and Table 5.0-1 to reflect the questions and comments above. Of particular importance is to point out that: (i) a No-Project scenario (Alternative 1) would still result in significant adverse effects attributed to existing non-conforming skydiving land areas and incomplete mitigation from the prior runway expansion project; (ii) development of the project site allowed under existing zoning (Alternative 2) would result in more severe impacts associated with traffic and air quality; and (ii) Alternatives 3 and 4 are infeasible and therefore not worthy of consideration. Each alternative should also be weighed against project objectives. 11-14

Section 7.2: The second paragraph on page 7.2-1 summarizes a variety of impacts attributable to the proposed project. The tenor of this narrative suggests a departure from the City's current Land Use Element and introduction of impacts not previously considered as part of the General Plan Update EIR. This is not the case and should be clarified. Would it be possible to include a subsection that describes the project's beneficial attributes as a prelude to a Statement of Overriding Considerations? 11-15

2

MOTORSPORTS ENVIRONMENTAL IMPACT REPORT COMMENTS.

2.0 SUMMARY AND MISCELLANEOUS

M1. Replace plan sheets in the EIR with revised plan sheets supplied on the flash drive. 11-16

M2. The corrections pointed out below refer to only one section of the EIR but the intent is that all sections of the EIR containing similar text be amended also.

1. The document contains a number of typographical errors that may confuse the meaning of a sentence. Proof read the document for errors. 11-17
Examples: 4.3-45 last line remove [be]. 4.4-2 last paragraph first sentence [agrave] and the two attached pages from our proof reader requiring no return comment.

2. Page 2.0-5 seventh bullet point "...proposed mini storage..." This denotes a different use for the building. Correct the description to specify the storage of motorcycles and quads for local youth using the Park. 11-18

3 .Page 2.0-7, Alternative 3: To be correct, this alternative would need to include the drag strip pit areas 1 and 2 as those pits are shared use and required for the larger motocross events. 11-19

4. Page 2.0-16 and many other sections list the hotel as south and it is on H Street so it should be listed correctly as southeast. 11-20

5. Page 2.0-20 bullet number 3: "no single species shall constitute more than 60% of the vegetative cover. Dense willow thickets along with poison oak frequently constitute more than 60% of the species. Include and exception for dense willow thickets. 11-21

6. Page 2.0-24 Paragraph three: "limited to proposed project events" Correction, This is not a accurate characterization of the activities as there is open riding on the motocross tracks seven days a week when they are not in use for events. 11-22

7. Page 2.0-44, item 4.9-6; the Motorsports Park design has been completely changed three times and modified a number of other times to accommodate the Sky Dive operations. The conclusion that Sky Dive operations can not operate at the same time as Motorsports operations is not supported by any facts or the reality of the operation. Because of the prevailing wind from the west, sky divers approach the landing area from the east and overshot landings generally occur to the east of the landing area. 11-23
The following Park design changes have been made at the request of Sky Dive Santa Barbara to accommodate their simultaneous use with Motorsports Park use.
a. At Sky Dive's request, the landing area was initially moved to the west end of the Park Plan to eliminate wind turbulence from trees, the landing area was then moved to the east end of the Park to be in front of a viewing area Sky Dive had later built.
b. Mr. Hughes the owner had stated in emails that the landing area was too narrow to meet United State Parachute Association Standards below. The Park plan relocated the existing road next to the south embankment by removing vegetation which provides the 100 meter landing zone radius including the road surface.

c. When Mr. Hughes, reviewed the revised Park Plan with the Sky Dive landing area at the east end of the project, he asked that the Motocross pit area and trailers be moved to the west end of the Motocross area to eliminate any wind turbulence from the trailers. The design change was made and the portion of the Motocross Park west of the Sky Dive landing area is now the main Motocross Track.
d. When Mr. Hughes reviewed the revised landing area he asked for a longer landing area east to west as that is the landing direction. The USPA standard is a 100 meter circle [326 feet]. Design changes were made in the Park Plan to provide a east west dimension of 500 feet for the Sky Dive landing area to accommodate his request.
e. When Mr. Hughes reviewed the revised landing area size he raised concerns about the chain link fence separating the road and Sky Dive landing area. A design change was made to replace the chain link fence with a white plastic fence with break away plastic posts.
f. In a conversation at City Hall with the City Manager, Mr. Hughes expressed concern about cars using the entrance from George Miller Drive during week days when Sky Divers were landing. It was agreed that the road would be closed to traffic by his staff when Sky Divers were landing and the Foundation would supply any needed gates. As the road will be closed during Sky Dive landings the plastic fence can now be eliminated.
g. To provide an additional landing area, the City Manager suggested DZ-2 which was included in the environmental review by the City not the Applicant. Although Sky Divers land next to the runway at other airports the City Manager was familiar with, the draft EIR found that FAA requirements prevented use of this area. Please remove DZ-2 next to the runway from all pages in the EIR. 11-23
h. Sky Dive also utilizes a landing area in the Santa Ynez River bed, next to the Park, on United States Prison property for their student jumpers who require a larger landing area and that landing area is not part of this Project Site.
i. The Unites States Parachute Association standards for drop zone sizes are as follows:
"Areas used for skydiving should be unobstructed with the following minimum RADIAL distance to the nearest hazard: [s]"

> "a. solo students and A-license holders-100 meters [radius]"
> "b. B and C license holders and all tandem skydivers—50 meters. [radius]"
> "c. D license holders—12 meters [radius]"

CONCLUSION: All of the design changes and Park operating procedures requested by Mr. Hughes have been provided. The current landing area does not meet the standards for the United States Parachute Association for some of the Sky Divers that use it. The landing site in the Project plan will meet the USPA standard. Environmental review was never conducted for the use of the current Sky Dive landing area and that is now being done in this EIR. The enlarged landing site will provide a safer landing area. Project site clearance of vegetation for the Park up wind from the landing area will eliminate wind turbulence on the landing site. Concrete slabs on the landing area will be removed to enhance landing safety and water percolation. The Motorsports Park and the Sky Dive landing area can operate at the same time.

8. Page 20.-45 and various references in the EIR list various distances to the hotel south east of the Project and Purisima Highlands north east of the Project. Google earth should be used to determine the correct distance and all references corrected to be the same. 11-24

9. Page 2.0-46: "parking lot noise". This appears to refer to Project noise and is probably an error. If it is not an error then an explanation of the significance of parking lot noise is needed. 11-25

10. Page 2.0-49 Project impact paragraph one. See 4.11 Public services item # 1 above. 11-26

11. Page 2.0-51 "signs along the section of V Street from Central Avenue and proposed project site.' As events do not occur on week days, correct this to read 'No Parking on Weekends and Holidays" so that those visiting the planned industrial park on that site can utilize street parking during the week. 11-27

12. Page 2.0-52 project impacts last paragraph": "The project would add 117 PM peak hour trips" [daily?] Written comment was provided amending the Project Description and event grid months ago eliminating use of the drag strip until after 6:30 PM on Wednesdays. Motocross open riding on Mondays, Wednesdays and Thursdays from 3 to Sunset would have only 34 to 62 vehicles during the entire time period as compared to the 117 PM cars listed. Correct the PM car impact. 11-28

13 Page 2.0-52 "Entry Gate Operations" A second entry lane has been added see revised Plan Sheets A1 & A4B. Additionally most race participants register on line and receive a pass so they can avoid paying at the gate. 11-29

14. Page 2.0-55 Project impacts paragraph three: "an existing 5/8 potable water meter located along the existing gate" Correction see Plan Sheet A-5 and Detail A5-2 and item CC, the existing water meter is located at the Sky Dive viewing area 11-30

15. Page 2.0-56 project impact potable water: "approximately 7.9 AFY … [approximately 7,100 gallons per day]" Correction, the only proposed use for potable water is concession stands which are only open on weekends and will use their holding tank for waste water limiting their use. Restrooms are chemical toilets and use no water. Water connections are not provided for RVs spending the night. Weekend water use is estimated and less than 500 gallons per day during events. The Maintenance and storage building on George Miller Drive has a portable toilet and has no water connection. For 110 event days that would be 55,000 gallons plus other occasional uses for a total of 70,000 or about 2.7% of the 2,591,000 gallons estimated on page 2.0-56. 11-31

16. Page 2.0-57 Project impacts paragraph two: "waste water would be contained and removed from the site daily" Correction, portable toilets would be serviced at an interval commiserate with their use.
Paragraph 2: Correction, the waste water calculation appears to be based on the erroneous water use calculation addressed in item 30 above and should be corrected to the revised water use amount. 11-32

17. Page 2.0-60 Lighting: See section 4.6 item #3. 11-33

3.0 PROJECT DESCRIPTION

1 Page 3.0-10 Proposed Structures: "building and storage lockers" Correction, the more accurate statement is "motorcycle and quad storage lockers".

2. Page 3.0-28 Table 30.-2 lists the "Specialty drag race event" twice in error. If this double entry was used for emissions, traffic or any other calculation Correct this table and any resulting errors in calculations. 11-34

3. Page 3.0-31 "Santa Barbara COUNTY Fire Department.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

1. Page 4.0-3: Regarding the last project the Tobes Residential Development known as "Burton Ranch" Correction, the house count is 476 including the Cottages at Burton Ranch on page 4.0-4. 11-35

4.1 ASTHETICS

1. Page 4.1-2 Paragraph 3: "located southwest of the proposed Project is the gravel mine," CORRECTION the facility, locate southwest of the Project, is the sand, gravel and recycled concrete processing plant. 11-36
"North and West of the proposed Project site is the Santa Ynez riverbed which is the location of the ACTIVE SAND QUARRY."

4.2 AIR QUALITY

1. Page 4.2-21 paragraph 3 "all unpaved areas used for parking were treated as dirt roads for emissions modeling" Correction, all parking areas have a thick layer of wood chips, specifically to eliminate dust. Wood chips bear no resemblance to the air borne particulates from a dirt road. Second, the existing soil on the site is predominantly large grain river sand which generates very little dust when disturbed, see GSI soils report. Use the correct test data. All roads were planned to be compacted and watered road base which will be watered during use to minimize dust. Over time compacted road base forms a very hard surface. Mitigation requirements call for paved roads from the V Street entrance to the concrete area of the Park further eliminating vehicle travel dust. 11-37
Dust mitigation has been an important consideration in designing the Park and in its future operations. Here is a review of all Park areas for dust control.

PARK AREA	DESCRIPTION in park area	ACRES	DUST
Green Belt	Along the airport embankment	4.37	None
Entry Road	From Park boundary to pit area #1 asphalt paving	.69	None
Road Surfaces:	Two way 12" compacted Class II base watered		Very Minimal
	One way 6" compacted Class II base watered	3.53	Very Minimal
Parking lots	Wood chips at least 4" deep and watered	2.54	None
Drag Strip	Concrete drag strip and return roads	3.36	None
Grandstands	Includes surrounding viewing areas	.50	None
Safety Zones	Both sides of strip infiltration areas wood chips	1.74	None
Staging Area	Concrete	.58	None
Pit area #1	Concrete	1.09	None
Pit area #2	Wood chips at least 4" deep and watered	1.34	Very Minimal
Motocross Pits	Wood chips at least 4" deep and watered	.96	Very Minimal
Other Areas	Wood chips at least 4" deep and watered	.62	None
Handicap Parking	Decomposed granite compacted	.23	None
Handicap Viewing	Decomposed granite compacted	.48	None
Walk Paths	Decomposed granite compacted	.65	None
Trailers and Storage	All areas of the Park`	.19	None
Beginners track:	Native sand with a few small rises [watered]	.68	Very Minimal
Circle Track	Watered to remain sticky for racing with sand added for better traction. Generally every 3 races	.87	Very Minimal
Rhythm Track	Straight track watered when used with sprinklers along the fence next to the track.	.95	Minimal
Induro Cross	This track consists largely of non dirt obstacles including water and is low speed. Watered after 3 to 5 races.	.57	Very Minimal
Stadium Cross	This is an extreme track for expert riders only and will have far less use than the other tracks. It is maintained every 5-6 races	.57	Very Minimal
Main Motocross	The track has individual rain bird sprinklers at each jump to apply the correct amount of water. On race days the track is groomed twice daily	4.76	Minimal
Mud Bog	Race through a pit of mud and water	In Main Total	None
Sand Drag	Race on native sand	In Main Total	Very Minimal
Trail Ride Area	Low speed on a twisting trail on native sand	2.30	Very Minimal
Bikes on Trail	Mountain bikes on the Trail Ride Area	------	Very Minimal
Sky Dive Landing	Native Sand not under applicant control	3.43	None

Site Area per the Project Engineer 37.00 Acres

11-37

It is important to remember that specific clay soil must be imported to build competitive tracks and professional track builders travel to the Park to construct the tracks all of which is an expensive process. To preserve the tracks for extended use and avoid rebuilding costs and the cost of importing soil, precise watering and grooming is used both for daily use and events. The Park original design included water cannons that covered all riding areas equally. After reviewing best practices at other motocross parks, the design was changed to include a series of rain birds at specific locations on all tracks to apply the needed amount of water to each area supplemented by fire hoses. As we are in Lompoc with cooler temperatures and higher ambient humidity our watering frequency

will be less than tracks reviewed in hotter areas. A water truck is also used for larger areas such as roads and wood chip areas.

Because traffic and dust were the two most discussed issues with airport users, a lot of planning has gone into dust control including a well so that water cost is never an issue. 11-37

2. Page 4.2-25, last paragraph: "vehicles traveling to and departing from …would still exceed SBAPCD thresholds" Correction, with the correction of the average one way local vehicle trip from 20 miles to 2.87 miles this will be reduced or eliminated. 11-38

3. Page 4.2-26 paragraph one: 'The maximum number of vehicles and persons onsite during a weekday event [Wednesday] would be 234 and 627 respectively." Correction, this statement fails to identify that the maximum attendance on all others week days would be 62 vehicles and 105 persons. If week day emissions were calculated based on the sentence above, they would be over stated by 75% four days per week. Verify the weekly modeling used and add the information about the number of people and vehicles on other week days. 11-39

4. Page 4.2-26 paragraph two: Correction, amend the particulate amount after re-calculating based on the information in #1 above. 11-40

5. Page 4.2-27 paragraph three: "The proposed project would exceed the daily mobile emissions thresholds…primarily be generated by regional travel to and from the City and Lompoc Valley patrons. Correction many of the local guests of the Park and a substantial number of regional guests and users currently go to other locations in the central coast and southern California to be participants or spectators. These trips to the Project site will offset those trips and those emissions offsets must be accounted for. Consideration should also be given to the offset from the reduction of illegal riding in the Santa Ynez River bed which has no dust control. 11-41

6. Page 4.2-30 measure MM4.2-2 Stadium Cross races are of a shorter duration because of the rider difficulty and occur at a rate of up to 4 per hour to retain spectators at an event.

MM4.2-3 Endurocross races occur over obstacles and are lower speed with very little dust generated. Because of the rider difficulty they occur at a rate of up to 4 per hour.

MM4.2-4 the restriction of one race per hour for three hours each week end will eliminate all events on the main track and make the project not financially viable. Correction races occur at a rate of 4 to 6 per hour depending on the skill and age of the racers and a race day is 8 to 10 hours. See table 3.0-1

Paragraph two of LEVEL OF SIGNIFICANCE AFTER MITIGATION: Amend the paragraph after correcting all the emissions in Table 4.6-1 11-42

4.3 BIOLOGY

1. Page 4.3-5: Correction, the Arroyo Willow Thickets on the parcel are not correctly characterized. This may have occurred because the reviewer was not familiar with the site 11-43

and old satellite images were relied on. In the process of planning the Project, there have been a number of site reviews at different seasons. The site has three different Willow plant community types.
A. The willows in the trail ride area are an older re-growth plant community and cover most of the area as shown in a1980's aerial photo previously provided. The significant debris on site are three large concrete tank supports. There is a former road through the middle of the site that formerly extended to the river. The Willow Grove on the site is quite dense and becomes more dense on the river side. The second most common species in the Willow Grove is poison oak.
B. The second willow re-growth area is along the north side of the parcel and west of the most westerly building slab. Some of this willow growth appears on the 1980's aerial of the site. This area is dense with vigorous vegetation. The adjoining use to the north in the river bed is the sky dive landing area which is not in the Project. The area to the south of it is seasonal plants on a former road area with debris piles. A vehicle road cut through the willows near to the river bed by the most westerly building slab is for Sky Diver pick up. It is used as a pedestrian path today.
C. The third area is in the south west portion of the Project site. This area was graded for prior commercial and industrial uses and has scattered debris including an asphalt road shown on older maps. On the north and west sides, the area adjoins the quarry road and the active Sand Quarry. On the south side the area adjoins the airport and on the north and east it adjoins areas of the Project site with Coyote brush and seasonal plants. The site is not a dense willow thicket and instead has interspersed Coyote brush and seasonal plants. The available satellite images, taken after wetter winters, appear to show a more dense willow thicket. A walk over reveals that a substantial percentage of the willows in this area have died as a result of drier years while those in other areas of the Project site near the river are still vigorous. Because it is a previously graded site, is not made up of dispersed willow plants, has inadequate soil moisture to support willows and is not contiguous to other riparian habitats this area is not a candidate for mitigation.

11-43

With regard to mitigation of areas A&B two options are available. There is land on the site and the adjoining Prison property that can be used for mitigation and should be at a 1-1 ratio. The advantage of mitigating on and around the site is that the on site water system for dust control can be utilized to be certain the willows receive adequate water until they are deeply rooted.

A recent biological study of the parcel for the Southwest Willow Flycatcher found the area to be poor habitat. With no water on or near the site and poor vegetation the site is a lower quality habitat and any required off site mitigation for areas A and B should be at no more that 3-1, if that.

Because the site is being developed in phases, any mitigation that is identified should be separated into the three areas listed above. The mitigation ratio assigned to each are should be based on the quality and area of the habitat if mitigation is required after a more detailed review of the Project site conditions.

2. Page 4.3-25 paragraph five, regarding CDFW permit 5-2001-0252. Correction, the EIR should establish through written comment by CDFW whether the mitigation area must be replanted or relocated to make way for the project.

A portion of the mitigation area is on Prison property and the EIR should determine if that portion must be mitigated or replanted by the Project as it is not within the Project boundary

3. The Black Flowered Figwort study was completed after the Draft EIR was completed. All sections of the EIR and in particular, restrictions and mitigation measures regarding the species must be updated.

In particular identify the fact that none were found on the project site and the Metz Loamy sand on the site is not well suited for the Figwort even though it grows in similar plant communities. In particular, eliminate the mitigation measure that requires a survey before work can begin.

4. The Southwestern Willow Flycatcher study was completed after the Draft EIR was completed. All sections of the EIR and in particular, restrictions and mitigation measures regarding the species must be updated.

In particular, identify that none were found on the project site and the site was found to be poor habitat.

5. Page 4.3-28 last paragraph and continues onto the next page; Correction, as the Santa Ynez river upstream from Miguelito Creek does not meet any of the criteria in the Supreme Court Decision cited, the EIR should address if the Santa Ynez River is in fact part of the waters of the United States or simply State Waters treated as the same. 11-43

Additionally, the EIR should address whether Section 404 applies to the Project site.

6. Page 4.3-31 paragraph six, riparian habitat definition; Correction, to avoid confusion and alternate definition of riparian habitat should be selected as there is no "nearby freshwater source" in either the real world or under the interpretation of the Supreme Court.

7. Page 4.3-34 and Table 4.3-6. Correction, because the Trail Ride area has been separated from the main Project area by Site Plan modifications to facilitate the Sky Dive operator, a foot note should be included to list the vegetation acreage of each type within the trail ride area in case future Project design changes to facilitate Sky Dive render the area unusable.

Last paragraph: Correction, clarity if the 0.5 acres of AWT that currently exists is on the Project site or the adjoining Prison property.

8. Page 4.3-38 second to last paragraph; Correction, the paragraph does not appear to be consistent with the section discussed in item 5 above.

Last paragraph "The proposed Project is designed such that surface water runoff will be directed into two infiltration basins on site…" Correction, the site will be graded so that storm water flows away from the edges of the site and percolates in the sites sandy soil. See GSI soils test. Stormwater from the concrete areas of the site flows to the two infiltration basins on the site. There will be no change in the water flow in the parachute landing area and the trail ride area as there is no grading in those areas. The two existing

drains from the airport that drain into the parachute landing area will be extended under the relocated entry road and continue to drain onto the parachute landing area. Percolation in and around the parachute landing area will be enhanced by the removal of numerous concrete slabs in the area. Although the parachute landing area is within the Project boundary it is not under the control of the Applicant and is administered by the City of Lompoc and its current and future agreements with Sky Dive Santa Barbara. An existing man made berm separates the Sky Dive landing area from the Santa Ynez River on the Prison property.

These three corrections in storm water percolation need to be made in numerous paragraphs and sections of the EIR. 11-43

9. Page 4.3-41 Cumulative Impacts: Correction, the conclusion that "other projects may be located along the drainage is not supported by the facts. The City of Lompoc owns the land on both sides of the river from upstream of the highway 246 bridge to the bend in the river and the south side of the river from the bend in the river to the waste water plant. Most of this land has established City development plans none of which include the removal of any riparian habitat. The other side of the River is Prison property with no plans to change current operations announced. Hence the conclusion needs to be quantified or amended.

Second to last paragraph: "other projects developed in the City and surrounding area could impact biological resources." Correction, define the distance from the project site that this statement covers. The only projects within a half mile of the project site with entitled development in the City, is currently used for farm fields. Further the reduction of illegal riding in the Santa Ynez River could help preserve other habitat for various plants and animals as an offset. The area in the river currently used for riding is many times greater than the Project site.

4.4 CULTURAL RESOURCES

1. Page 4.4-10 Paragraph one sentence one: Correction, include repeated site grading and excavation for building slabs and piers as well as underground tank burial in soil disturbance. 11-44

4.5 GEOLOGY AND SOILS

1. Page 4.5-8 last paragraph: Correction, add and "a USGS well, not currently being monitored, is in the north east corner of the proposed Sky Dive landing area." After we discovered it was a USGS well we contacted USGS and they attached a sticker and requested that five feet of the concrete building slab surrounding the well be retained when the rest of building slab is removed. 11-45

2. Page 4.5-9, Paragraph 3: Possible correction, depending on whether or not the Santa Ynez River meets the Supreme Court test defining "waters of the United States".

3. Page 4.5-15 Paragraph 3: Correction, this paragraph is not consistent and does not address the specification for the paved roads required in the particulate emission section of the EIR

11-45

4.6 GREEN HOUSE GAS EMISSIONS

1. Page 2.0-5 and many other sections refer to a one way trip distance to the Project in the Lompoc Valley of 20 miles.

Here are area one way trip distances and populations:

Location	Average Miles	Furthest Point	Population	% Pop.
City of Lompoc	2.4	4.4 316 Sheffield	44,499	
[Less Prisoners]			[1,523]	
Total			42,976	81%
Mission Hills Community Service District	4.3	5.4 1774 Calle Lindero	3,300	6%
Vandenberg Village Community Service District	5.0	6.4 La Costa Lane	6,948	13%
		Total	53,224	

11-46

Population numbers for MHCSD and VVCSD were supplied by those agencies.

Therefore the average miles traveled to the Project site loaded for population is 2.87 miles. The 20 mile number used in the EIR is 86% too high.

Reduce the one way Lompoc Valley average trip distance to the Projects site to 2.87 miles.

Lompoc Valley trips represent between 60% and 75% of all trips [page 4.13-15]. At 65% local trips the emissions for local and regional trips would be 66% less than the number currently listed. Correct the GHG emissions in Table 4.6-4 on page 4.6-18 and all other places the number occurs plus any correction for number 2 immediately below.

2. No reduction is made in the number of trips that Lompoc Valley residents currently drive though the valley to attend other area motocross riding areas in Buellton, Santa Ynez [Figueroa Mountain] and Pismo Dunes and will now make the shorter trip to the Project Site. No reduction is made in the number of trips for Lompoc Valley residents that currently drive to Bakersfield to attend drag races.

Reduce the trips to the Project Site by the average number of these trips as they are rerouted existing trips and will be shorter distances than the trips to facilities in surrounding communities. 11-46

3. Page 2.0-60 and Table 4.6-4 dramatically over estimated electrical consumption at 3,823,407 kWh. Musco lighting estimates the energy use for the lights from dusk to 10:30 PM on Saturday, Sunday and Wednesday nights to be 138 kWh per hour to operate the lights. At an annual average of four hours per night for three nights per week for fifty weeks that is 600 hours. 600 hours tines138 kWh is 82,800 kWh per year for the lights. With general use of 36,000 kWh per year, it would be about 118,000 kWh per year. That is 4% of the electrical use estimate in the EIR 11-47
Other small uses are the two trailers in the motocross area when that area is open, the two trailers at the drag strip when that area is open and the concession truck or trailer that will be at the Park for events.
Currently about 30% of the electricity supplied by the City of Lompoc is from renewable sources, geothermal and hydro electric, and it does not appear that any reduction was made for those renewable resources.

4. Page 2.0-15 Mitigation Measure 4.2-4 restricts motocross events to 18 vehicles with 1 race per hour for 3 hours each day. This was driven by the dust calculations which do not reflect the true conditions and were addressed in Section 4.2 item #1 above. Correct the number of races and vehicles per race to the numbers shown on Table 30-1 supplied by the applicant. If additional mitigation is required specify it be addressed in the dust mitigation plan. 11-48

5. Page 4.6-18 table 4.6-4: Corrections, in on site vehicle emissions.
A. The Operational [regional mobile] sources is over stated by the error in the one way trip distance shown in Number 1 above and the failure of the model to give credit for redirected trips that currently occur to other riding and racing locations as well as the typical reduction in illegal street racing and the reduction of illegal riding in the Santa Ynez River. 11-49
B. The Operational [on site mobile] sources is understated in the EIR did not measure the emissions of the proposed maximum racing schedule but an alternative selected by the authors. Correct the emissions to match the events proposed by the Applicant.
C. The Energy section is dramatically overstated by 96% as the electrical consumption estimated for the Project is dramatically higher than the proposed actual use. See item #3 above.

6. Revised table 4.6-4 contains the corrected emissions as discussed above and an estimate of the on site vehicle use GHG emissions. 11-50

GHG Emissions Source	emissions listed	factor	correct emissions
Construction [amortized]	18.1	100%	18.1
Operations [regional mobile]	6,007.9	33%	1982.6
Operations [on site]	1,057.9	150%	1586.8
Energy	1,111.8	4%	44.5

Waste	0.4	100%	0.4
Water	2.5	3%	0.1
ANNUAL TOTAL	8,198.6		3,632.3

11-50

The corrected amounts represent at least a 56% reduction in GHG without reductions for re-routed trip, reduction in illegal street racing and illegal riding in the Santa Ynez River..

7. Pages 4.6-18 through 20 will require Corrections, and changes to Table 4.6-4 and Table 3.0-1 on page 3.0-27, and other sections.

4.7 HAZARDS AND HAZARDOUS MATERIALS

11-51

1. Page 4.8-15 'runoff water would be directed to two infiltration basins': Corrections, storm water would be directed away from the edges of the site toward the center. Storm water from concrete surfaces would be directed to two infiltration basins. No runoff will drain into the Santa Ynez rive except the trail ride area that will not be graded.

As the Trail Ride area can not be graded to stop water flow into the Santa Ynez River and if that creates s significant impact it can be eliminated from the Project Area as a mitigation condition. State Parks has agreed to drop this area without impacting the grant if needed for mitigation.

4.8 HYDROLOGY AND WATER QUALITY

11-52

1. See section 4.3 comment #1 immediately above which corrects several statements regarding storm water on the Projects Site.

2. Page 4.8-17 Paragraph 5 "fill a 5,000 shallow reservoir on site": Correction it will fill a 5,000 gallon tank with a booster pump on the Project site.

3. Page 4.8-20 Paragraph six last sentence: CORRECTION: in discussions with Craig Stuart of then Penfield and Smith about the stream modification permit he opinioned that the Park may have to have a response plan to lay down fences in case of site flooding. I recommend that the following be added to the last sentence. "…or an alternate plan as provided in the stream bed modification permit".

4.9 LAND USE AND PLANNING

11-53

1. Page 4.9-1 Last paragraph "of 65-72 feet: Correction, "of 65-82 feet" and see topography lines on Plan Sheet A-1 and A-4B.

2. Page 4.9-2 Third bullet "Existing agricultural land…" Correction Existing Prison agricultural land"

3. It has been agreed that the Lompoc Airport Master Plan of 2011 shall be the reference document for all space clearances and should be so noted in the EIR.

4. In revised Plan Sheets submitted with this document, on advice of AECOM the entry road across the Runway Obstacle Free Area of 500' has been lowered at least 3 feet. This will eliminate the need for the overhead barrier in 2.0-42 and numerous other references in the document. See revised Plan Sheets A-4B & C.

5. Page 4.9-8 Paragraph three "displacement threshold of approximately 116 feet": Correction, the landing displacement threshold was eliminated in the 2011 Airport Master Plan but the paint has not yet been painted over.

6. Page 4.10 paragraph one line five "as wells ad" Correction, "as well as" approach and departure surfaces. Correction, the two surfaces use different ratios and should be listed accordingly.

7. Page 4.9-11 last sentence "...elevation [88 feet MSL]" Correction, page 4.9-10 paragraph 3 correctly identifies the west end of the runway elevation at 79 feet MSL. The 88 feet MSL identified in this sentence is the elevation for the east end of the runway.

8. Various pages: See revised Plan Sheet A-4B and new Plan Sheet A-4C and A-4D that correct the following design errors:
a. Relocate the V Street access road outside the south side of the Runway Obstacle Free area and move the north side to the corner of the zone. Second, lower the road by at least 3 feet to remove interference with the Departure Surface.
b. Reduce the height of the lighting poles on the drag strip so they are below the Transitional Surface at 107' MSL for the northern light posts and 90 MSL for the southern posts at the top of the fixture and the aircraft warning light.

11-53

9. Page 4.9-17 paragraph four, last sentence: 'The current DZ diameter is approximately 515 feet." It is unclear which DZ this statement refers to. If it is the DZ on the Project, site paragraph one at the top of this page correctly lists the DZ on the Project sites as 250 feet by 500 feet which would make the diameter 250 feet. If the DZ referred to is the DZ in the Santa Ynez River bed outside the Project area then it should be identified as such.
The Sky Dive Santa Barbara section should list all the design changes made to the project to accommodate Sky Dive Santa Barbara and listed in section 2.0 comment #8 above

10. Figure 4.9-8 View A-B is drawn incorrectly. The land slopes down hill from the end of runway to the level of the existing road. The land to the west of the road, left on the drawing is at the same elevation as the existing road.

11. Page 4.9-24 Policy 4.4 Analysis. Eliminate light poles from mitigation as heights are amended on revised plan sheet A4C, A4D and A-5.

12. Page 4.9-35 paragraph one: With the agreement between the Foundation and Sky Dive Santa Barbara to close the access road from George Miller Drive when sky divers are landing, the fence between the road and the landing area can now be eliminated which

widens the landing area from the 275 feet shown to more that 330 feet and meets USPA standards.

13 Page 4.9-35 A condition should be added that the FAA Form 5010 be amended by the City to reflect Sky Dive Santa Barbara's current days of operation and any additional DZ locations outside the Project area.

14. Page 4.9-35 last sentence: The writer of the EIR has misinterpreted the provided drawings and text. There was never any intent to relocate the DZ off the Project area. Instead the City of Lompoc, separate from the Applicant, offered Sky Dive an additional landing area next to the west end of the runway and included that additional DZ-2 in the design with the Applicants permission. The Applicant through numerous design changes has enhanced and enlarged the existing DZ on the Project site to meet USPA standards. 11-53

15. Page 4.9-37 MM4.9-4 The applicant has no control over DZ2 proposed by the City as it is not within the project area. Correct this requirement from "The Applicant" to "The City"

16. Page 4.9-38 Eliminate MM 4.9-6 Eliminate this restriction based on the extensive design changes made to facilitate the use of the Sky Dive landing area while the Park is in operation.

17. Page 4.9-38 MM 4.9-7 It is not known at this time if CDFW will require the twice failed mitigation area to be replanted. Add to the end of the sentence "if required by CDFW".

4.10 NOISE

1. Page 4.10-11 Table 4.10-3 Site 2 is probably H Street and George Miller Drive as shown on figure 4.10-4. This figure does not identify location 5.
Identify the aircraft measured in table 4.10-4

2. Page 4.10-20 paragraph one: The last sentence implies that modified motorcycles can run in the Park. Add: Because this Park is funded with State Parks grant funds OHV's must have a stock exhaust of a CARB approved after market exhaust that meets California Standards for the year of motorcycle or quad to be ridden in the Park. 11-54

3. Page 4.10-24 paragraph 2 is at 65dB and is inconsistent with the measured aircraft noise on 4.10-4 and should be consistent.

4. Page 4.10-35 last paragraph first sentence: "often without sufficient muffling". This statement may have been true in the past but with new CARB requirements for particulate traps, this statement should be removed or supported by data.

5. Page 4.10-27 paragraph one sentence one: Figure 4.10-7 lists only pile drivers as generating noise over 100 dB and no pile drivers will being used on this project. Correct the statement to include only the sound level of equipment to be used on this Project site.

6. Page 4.10-19 paragraph 2: To provide greater transparency, about the noise sturdy, a list of vehicles, their types of exhaust and the measured dB should be included along with the test methodology. In fact six vehicles were tested not four.
This paragraph also fails to mention the sound test station that was radio linked to the microphone at the test vehicles and should be included in the EIR along with its location.

11-54

4.11 PUBLIC SERVICES

1. The EIR should note that the drag strip sanctioning body, the International Hot Rod Association, requires that a Paramedic Ambulance be on site for any racing to occur plus a truck equipped with vehicle fire suppression equipment and trained staff. Motocross racing events also require that a Paramedic Ambulance be on site for racing to begin or continue. These requirements will minimize the impact on Fire services.
The EIR should note that all events include paid professional security officers which will mitigate impacts on Police services.

2. Page 4.11-5 and all other related sections need to include the Paramedic Ambulance on site for racing to occur and the on site fire suppression equipment for vehicle fires.

11-55

4.12 RECREATION

1. Page 4.12-8 last paragraph "20' x 1320' rhythm track of approximately 4.6 acres. The track actual area is .95 acres, see section 4.2 comment #1.

11-56

4.13 TRAFFIC AND CIRCULATION

1. The Peak hour flow in the EIR does not correctly characterize the Park operations as only the open riding occurs during Monday, Thursday and Friday during peak traffic hours. On those days from 3:00 until sunset only 35 to 62 vehicles are planned to access the Park. Wednesday night drag racing was changed, in writing several months ago to 6:30 PM to Sunset or 10:00 PM when lights are installed. This has been discussed in several conference calls also. Correct Table 3.0-2 to reflect the correct times and correct the peak hour car count to reflect a portion of the 35 to 62 Motocross park users vehicles on Monday, Thursday and Friday.
Page 4.13-13 paragraph 2 is one of many sections with the wrong trip count including Table 4.13-8, 4.13-11 and 4.13-12.

2. Page 4.13-35 Signage Plan, amend to read "week end and holiday" no parking signs.

11-57

4.14 UTILITIES AND SERVICE SYSTEMS

1. Page 4.14-14, bullet 3: add TWO fire hydrants installed along it.
Bullet 4: "A 2-inch galvanized water line': This potable water line is PVC, not galvanized pipe.
"extended north to the oval track" add AND SOUTH TO THE DRAG STRIP.

2. Table 4.14.1-10 and related material grossly misrepresent potable water use on site which is primarily for concession trucks or trailer at weekend events. See Section 2.0 comment 16. Consumption is estimated to be far below 70,000 gallons per year.

11-58

5.0 ALTERNATIVES

1. Page 5.0-2 paragraph 2, Correct the emissions levels based on the correct vehicle trip distances.

2. Figure 5.0-1 and related text. This is the entire list of locations the City sent us for review as items A through F. We told the City at that time only locations A and B were ever considered by the Motorsports Committee. If locations D through F are included because the City considered them or Meridian had to look at additional locations, they may be included with a disclaimer that these locations were NOT considered by the Applicant.

3. Page 5.0-13, last paragraph, Correction, eliminate the reference to significant impact to emissions.

4. Page 5.0- 22 for competitive events the OHV area relies on Pit area 1 and 2 from the drag strip area to accommodate participants. To correctly analyze this alternative those areas must be included in the evaluation and particularly Table 5.10-1.

5. Page 50.38 Environmentally Superior Alternative paragraph 3: With the correction of the travel distance and emissions to less than significant, the conclusion in this paragraph appears to no longer be valid.

11-59

6.0 EFFECTS NOT FOUND TO BE SIGNIFICANT

No Comments

7.0 OTHER SEQA SECTIONS

No Comments

7.1 GROWTH INDUCING IMPACTS

11-60

1. Page 7.1-2 last paragraph correction "of 4" non-potable and 2" potable water lines…

2. Page 7.1-3 paragraph four: 'is estimated to generate A MIXTURE OF 40 FULL TIME, PART TIME AND volunteer positions.

11-60

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

1. Page 7.2.2 last paragraph. With the correction in Lompoc Valley travel distances and correcting the electrical usage, this impact will be reduced to Less than Significant.

11-61

8.0 ORGANIZATIONS AND PERSONS CONSULTED

1. If the consultant used for the specific studies for the Southwest Willow Flycatcher and the Black Flowered Figwort are not included, they should be added to the list.

11-62

9.0 REFERENCES
No Comments

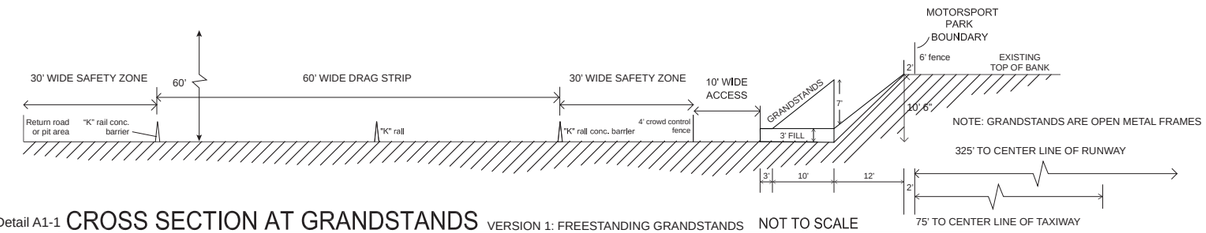
3

Corrections to Motorsports EIR Document

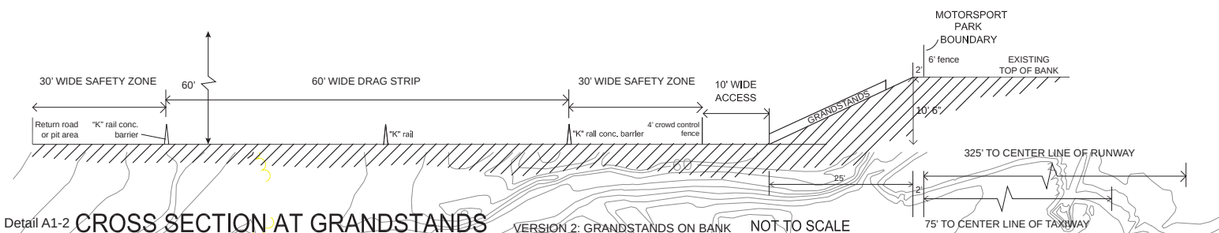
A. Page 3.0-9 Line 6 "temporary" should be "temporarily"
B. Page 4.1-16 Threshold 4.1-2 "substantially" should be "substantial"
C. Page 4.2-19 operation 4th line "discussion" should be "discussed"
D. Page 4.2-23 Line 4 City's [needs space here] 2030
E. Page 4.2-24 Construction Emissions, last sentence before table 4.28 "requires" should be "require"
F. Page 4.2-25 Operational Emissions second line "provides" should be "provide"
G. Page 4.3-8 Santa Ynez Ground Star 4th line "form" appears to be "from"
H. Page 4.3-17 California Red-Legged Frog, last line the species is "not" instead of "note"
I. Page 4.3-24 Western Red Bat 1st line "suitable" has an extra 's'
J. Page 4.3-24 Wildlife Movement Line 4 "as" should be "an"
K. Page 4.3-36 Southwestern Willow Flycatcher, Last sentence "impacts would [add the word "be"] potentially..... 11-63
L. Page 4.5-12 Third sentence from bottom is a comma after the word "zone" should be a period
M. Page 4.5-16 Threshold 4.5-4 1st line, 6th word "proposed"
N. Page 4.9-21 third last line "borders"
O. Page 4.9-22 first full paragraph, last sentence. Space between sentences
P. Page 4.9-31 airport land Use Plan, third line, a number [add] "of"
Q. Page 4.9-36 Emergency Landing Areas, last sentence, would [add] "not"
R. Page 4.9-38 Line 6 "prior to" stated twice
S. Page 4.10-42 second to last paragraph, last sentence "according" should be "accordingly"
T. Page 4.10-42 last paragraph, last sentence "vibrations" should be "vibration"
U. Page 4.12-2, Table 4.12-1, Line 3, to those[add] "of"
V. Page 4.12-8, First line, delete "in" last word of sentence
W. Page 4.13-28 Line #5, Miller-"e" not "a"
X. Page 4.14-14, Proposed Project design features, 4th line "connect' should be "connected"
Y. Page 4.14.1-15, 3rd full paragraph, 1st line "form" should be "from"
Z. Page 4.14.1-17 Cumulative Impacts, 1st line "potentially" should be "potential"
AA. Page 4.14.1-18, 1st line, delete 2nd "would"
BB. Page 4.14-2, second to last line "board's"
CC. Page 14.4-1 Cal Energy Code, last sentence "though" ....uncertain what is meant
DD. Page 5.0-3, third line from bottom, delete "to"
EE. Page 5.0-10, Hydrology & water quality, third sentence from bottom, "not result" add "in"
FF. Page 5.0-11 Public Services, third sentence from bottom, would [insert] "be" a less....
GG. Page 5.0-18, Recreation, 1st line, "development" should be "developed"

HH. Page 5.0-18 Recreation, 5th line "utilized" should be "utilize"
II. Page 5.0-19 Traffic & Circulation, 1st line delete "could"
JJ. Page 5.0-19 Sewer, probably should be "906,125 gallons
KK. Page 5.0-20, Summary of Comp. Impacts, 2nd line from bottom, as there would [add] "be" a.....
LL. Page 5.0-24, Geology and soils, 6th line, "geology" should be "geological"

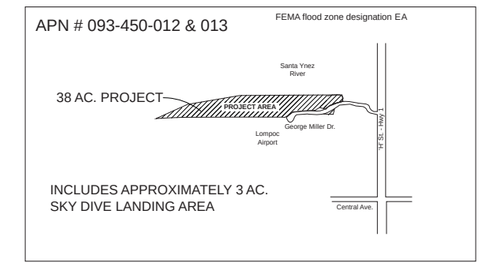
11-63



Detail A1-1 CROSS SECTION AT GRANDSTANDS VERSION 1: FREESTANDING GRANDSTANDS NOT TO SCALE



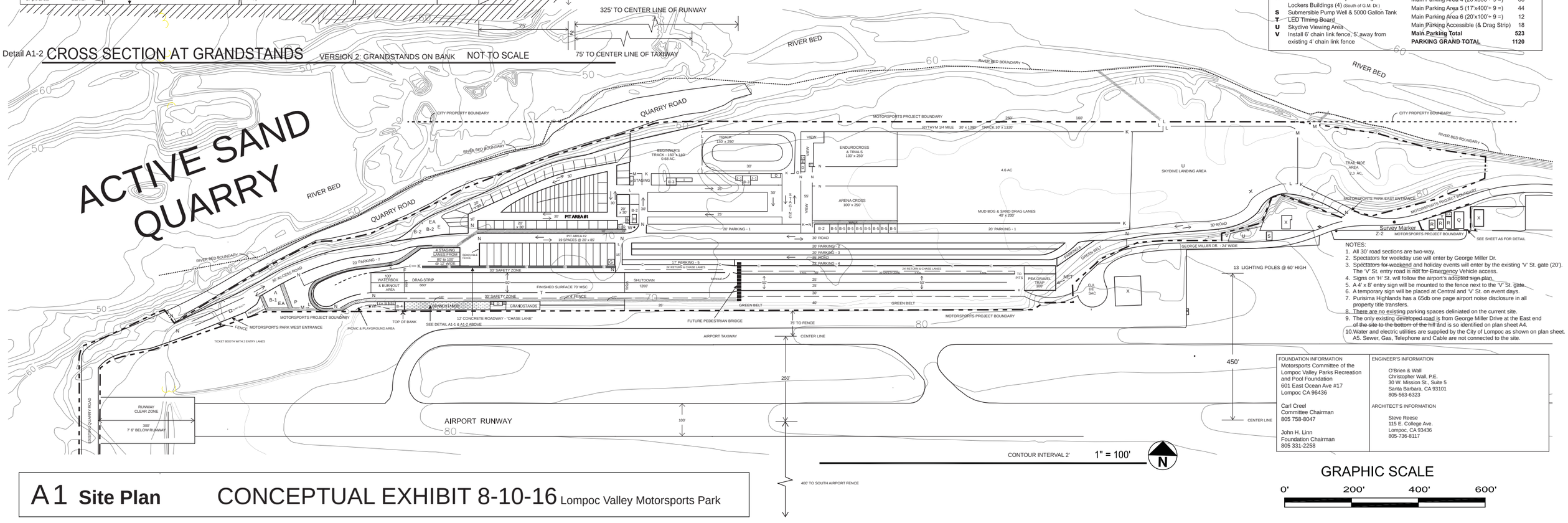
Detail A1-2 CROSS SECTION AT GRANDSTANDS VERSION 2: GRANDSTANDS ON BANK NOT TO SCALE



VICINITY MAP NOT TO SCALE

A	Fire Truck Turning Area (80' Diameter) All 30' roads and 20' roads in pit areas are built for Fire Truck use	**W**	Fire Hydrant (2)
B-1	Accessible Parking - 30 spaces car & van accessible	**X**	Existing Structure
B-2	Accessible Parking - 2 spaces auto & van accessible	**Y**	Dumpster at maintenance storage building
B-3	Accessible Parking - 1 van, 1 auto, includes shade, Accessible seating & accessible portable toilet	**Z-1**	Replace 184' of existing 4' chain link fence with 6'
B-4	Accessible viewing area	**Z-2**	Replace 375' of existing 4' chain link fence with 6'
B-5	Accessible parking, 2 vehicles		
C	42' Lighting Poles with solar aircraft warning light (16)		
D	Concession Truck or Trailer		
E	Portable Toilets (EA Accessible)		
F	Timing Truck or Trailer (Occupancy Code B)		
G	Elapsed Time Trailer (Occupancy Code B)		
H	Office Trailer (Occupancy Code B)		
I	Training Trailer (Occupancy Code B)		
J1	Motocross Area Grandstands (100 seats)		
J2	Portable Grandstands Locations (300 seats each)		
K	20' Gate Set		
L	15' Gate		
M	5' Gate		
N	30' Gate Set		
O	10' Gate		
P	Storage Container		
Q	Occupancy Code S-1 Storage & Maintenance Building (South of G.M. Dr.)		
R	Future Phases Motorcycle Storage Lockers Buildings (4) (South of G.M. Dr.)		
S	Submersible Pump Well & 5000 Gallon Tank		
T	LED Timing Board		
U	Skydive Viewing Area		
V	Install 6' chain link fence, 5' away from existing 4' chain link fence		

OHV PARKING (SEE SHEET A2 FOR DETAIL)	
Accessible Spaces	6
Parking Spaces	69
42 Truck & Trailer Parking	84
OHV Parking Total	**159**
PIT AREA PARKING (SEE SHEET A3 FOR DETAIL)	
Pit Area 1 (78 spaces x 2 or 3)	200
Pit Area 2 (19 spaces x 8)	152
Pit Accessible (1 van)	4
Drag Strip Pit Total	**356**
DRAG STRIP PARKING (SEE SHEET A3 FOR DETAIL)	
Drag Strip Accessible (2 vans)	30
Drag Strip Parking 7 (20' x 540' ÷ 9 =)	50
Drag Strip Total	**80**
MAIN PARKING	
Main Parking Area 1 (20'x1161'÷ 9 =)	129
Main Parking Area 2 (20'x1280'÷ 9 =)	128
Main Parking Area 3 (20'x1260'÷ 9 =)	126
Main Parking Area 4 (20'x600'÷ 9 =)	66
Main Parking Area 5 (17'x400'÷ 9 =)	44
Main Parking Area 6 (20'x100'÷ 9 =)	12
Main Parking Accessible (& Drag Strip)	18
Main Parking Total	**523**
PARKING GRAND TOTAL	**1120**



NOTES:
1. All 30' road sections are two-way.
2. Spectators for weekday use will enter by George Miller Dr.
3. Spectators for weekend and holiday events will enter by the existing 'V' St. gate (20'). The 'V' St. entry road is not for Emergency Vehicle access.
4. Signs on 'H' St. will follow the airport's adopted sign plan.
5. A 4' x 8' entry sign will be mounted to the fence next to the 'V' St. gate.
6. A temporary sign will be placed at Central and 'V' St. on event days.
7. Purisima Highlands has a 65db one page airport noise disclosure in all property title transfers.
8. There are no existing parking spaces delineated on the current site.
9. The only existing developed road is from George Miller Drive at the East end of the site to the bottom of the hill and is so identified on plan sheet A4.
10. Water and electric utilities are supplied by the City of Lompoc as shown on plan sheet A5. Sewer, Gas, Telephone and Cable are not connected to the site.

FOUNDATION INFORMATION
Motorsports Committee of the Lompoc Valley Parks Recreation and Pool Foundation
601 East Ocean Ave #17
Lompoc CA 96436

Carl Creel
Committee Chairman
805 758-8047

John H. Linn
Foundation Chairman
805 331-2258

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805-563-6323

ARCHITECT'S INFORMATION
Steve Reese
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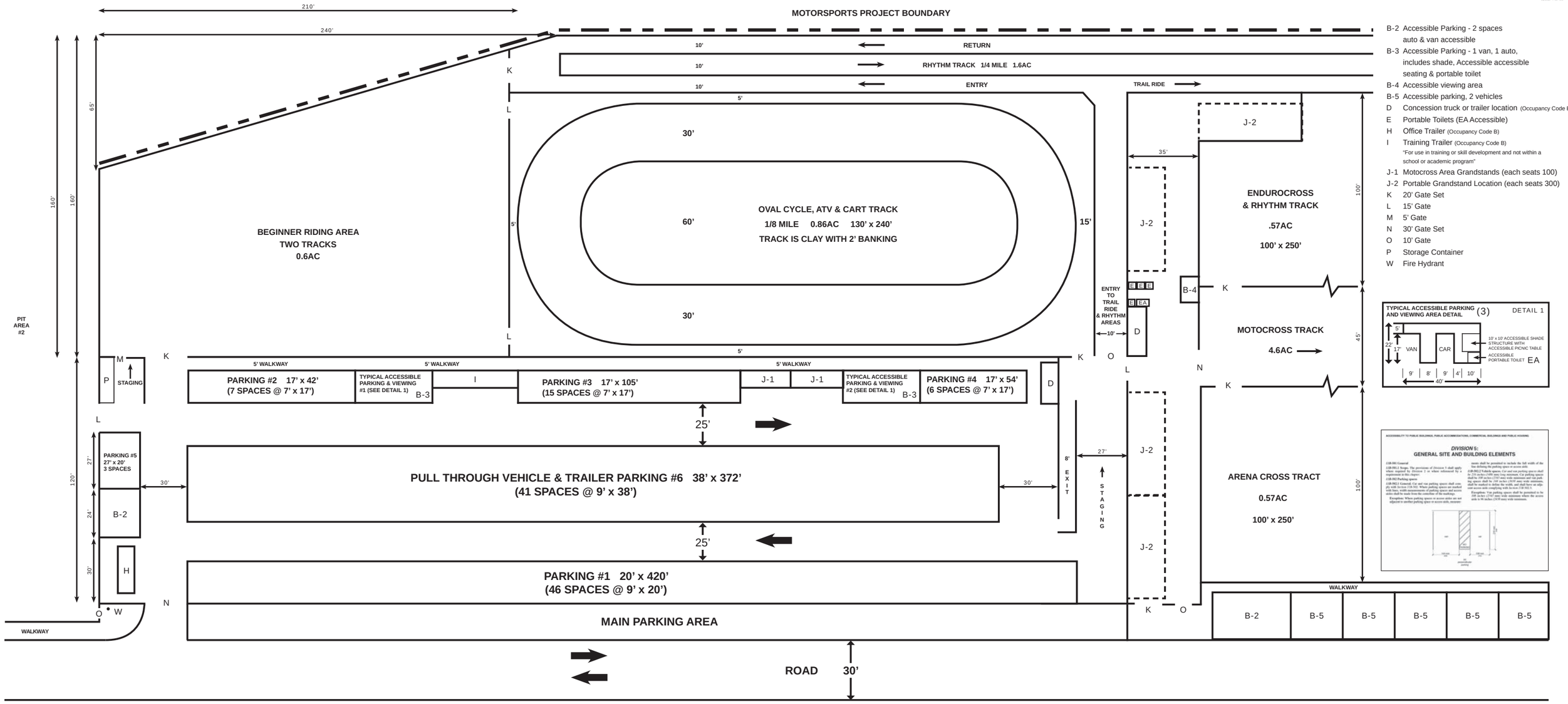
Lompoc, CA 93436
805-736-8117

GRAPHIC SCALE
0' 200' 400' 600'

A1 Site Plan CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

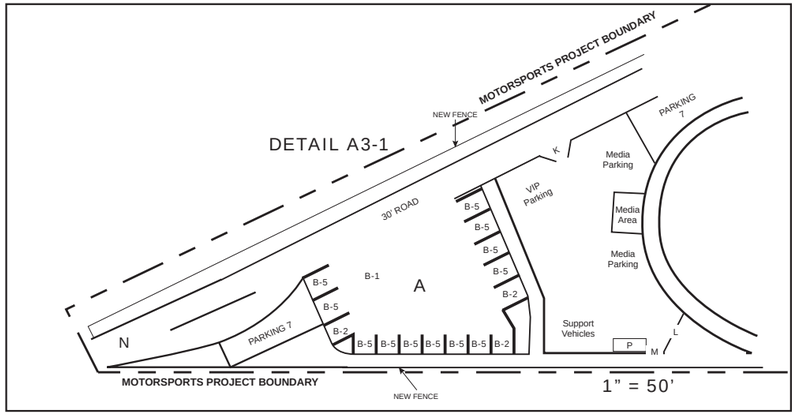


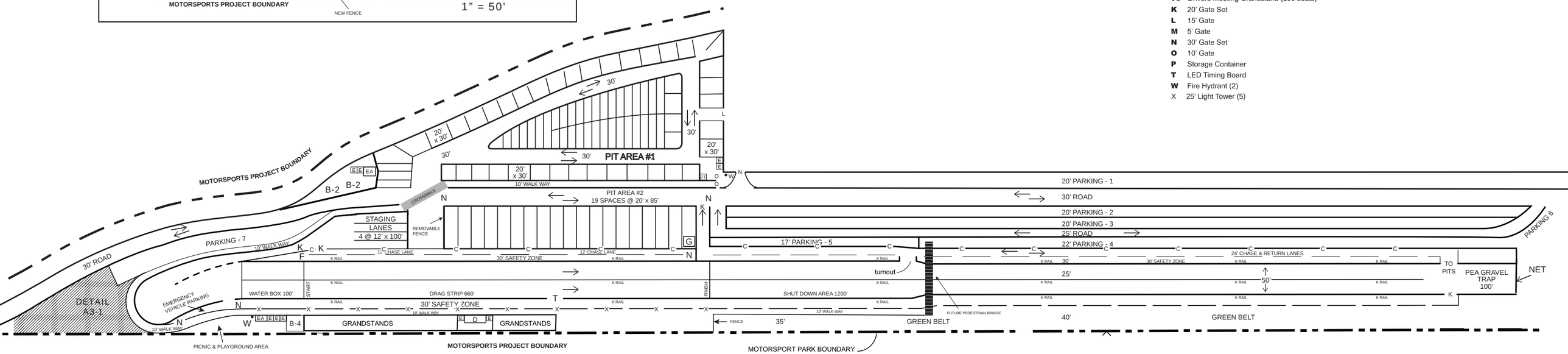
B-2 Accessible Parking - 2 spaces auto & van accessible
B-3 Accessible Parking - 1 van, 1 auto, includes shade, Accessible accessible seating & portable toilet
B-4 Accessible viewing area
B-5 Accessible parking, 2 vehicles
D Concession truck or trailer location (Occupancy Code B)
E Portable Toilets (EA Accessible)
H Office Trailer (Occupancy Code B)
I Training Trailer (Occupancy Code B)
"For use in training or skill development and not within a school or academic program"
J-1 Motocross Area Grandstands (each seats 100)
J-2 Portable Grandstand Location (each seats 300)
K 20' Gate Set
L 15' Gate
M 5' Gate
N 30' Gate Set
O 10' Gate
P Storage Container
W Fire Hydrant

A-2 OHV, Off Highway Vehicle Recreation Parking Area & Tracks CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

SCALE 1/16" = 1'

N





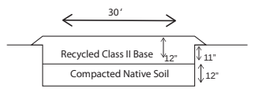
A Fire Truck Turning Area (80' Diameter)
All 30' roads are built for Fire Truck use
B-1 Accessible Parking - 30 spaces
& van accessible
B-2 Accessible Parking - 2 spaces
auto & van accessible
B-4 Accessible viewing area
B-5 Accessible parking, 2 autos
C 42' Lighting Poles (16)
D Concession Truck or Trailer location (Occupancy Code B)
E Portable Toilets (EA Accessible)
F Timing Truck (Occupancy Code B)
G Elapsed Time Trailer (Occupancy Code B)
J1 Drivers Meeting Grandstand (100 seats)
K 20' Gate Set
L 15' Gate
M 5' Gate
N 30' Gate Set
O 10' Gate
P Storage Container
T LED Timing Board
W Fire Hydrant (2)
X 25' Light Tower (5)

GRAPHIC SCALE
0' 200' 400' 600'

A3 Drag Strip, Pits & Parking

CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

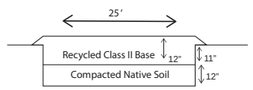
30' ROAD SECTION FOR 2-WAY TRAFFIC AND EMERGENCY VEHICLE ACCESS PER G.S.I. SOILS REPORT



The minimum standard structural section for an all-weather driveway is 12 in. of Recycled Class II Aggregate Base (95% relative compaction) (CAL-TRANS specifications) over 12 in. of compacted sub-grade soil (95% relative compation), with adequate drainage control.
Use this section over the two 10" PVC airport storm drain extensions.

Detail A4-1 NOT TO SCALE

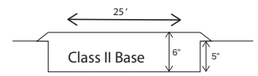
25' ROAD SECTION FOR 1-WAY TRAFFIC AND EMERGENCY VEHICLE ACCESS PER G.S.I. SOILS REPORT



The minimum standard structural section for an all-weather driveway is 12 in. of Recycled Class II Aggregate Base (95% relative compaction) (CAL-TRANS specifications) over 12 in. of compacted sub-grade soil (95% relative compation), with adequate drainage control.

Detail A4-2 NOT TO SCALE

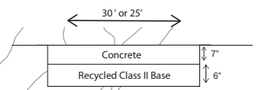
25' ROAD SECTION FOR 1-WAY PARKING LOT TRAFFIC, NOT FOR EMERGENCY VEHICLE ACCESS



Minimum Standard
Reduce existing grade by 5" and fill with 6" of Class II Aggregate Base and compacted to 95%

Detail A4-3 NOT TO SCALE

DRAG STRIP CONCRETE ROAD SECTION PER I.H.R.A. STANDARDS AND G.S.I. SOILS REPORT



5,000 PSI concrete at 28 days, smooth surface, monolithic pour of each lane and score at every 10' to a 2" depth over 6 in. of recycled class II base (95% relative compaction), with adequate drainage control.

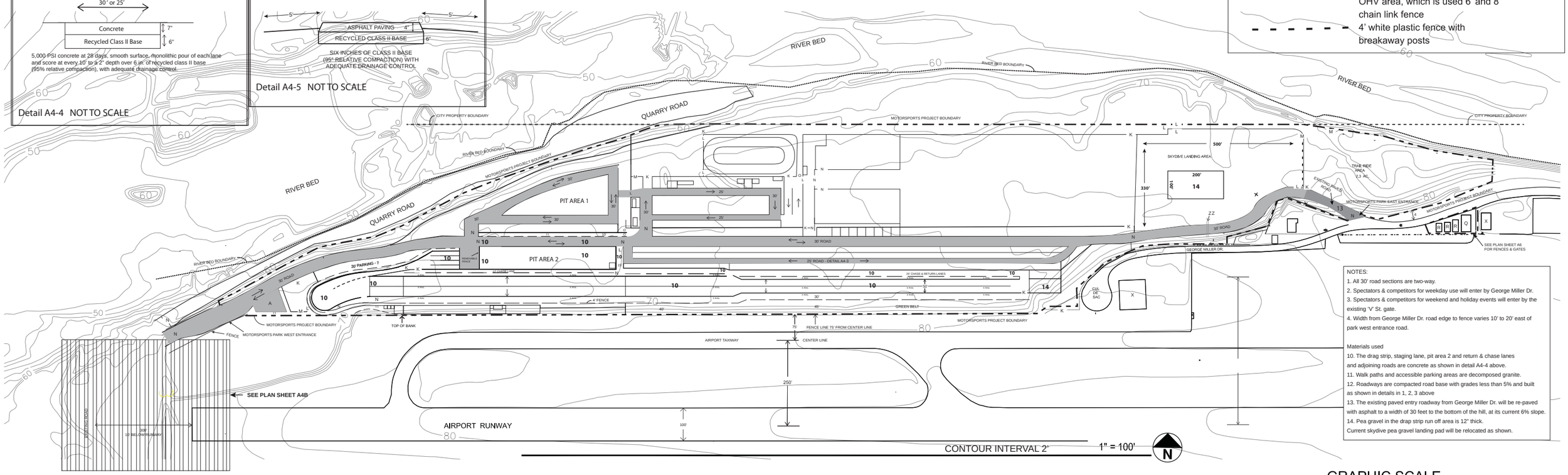
Detail A4-4 NOT TO SCALE

25' PAVED ROAD SECTION IF PAVED ROADS ARE REQUIRED

Detail A4-5 NOT TO SCALE

A Fire Truck Turning Area (80' Diameter)
All 30' roads and 20' roads in pit areas built for Fire Truck use
K 20' Gate Set
L 15' Gate
M 5' Gate
N 30' Gate Set
O 10' Gate
ZZ Airport storm drain extension - one 10" PVC, one 10" ABS.
Use road section A4-1 detail for cover.

- Existing 6' chain link fence
- Existing 4' chain link fence
- Replace 184' of 4' chain link fence with 6' chain link fence on George Miller Dr. and at back of maintenance & storage building
- New 4' chain link fence
- New 6' and 8' chain link fence except in OHV area, which is used 6' and 8' chain link fence
- 4' white plastic fence with breakaway posts



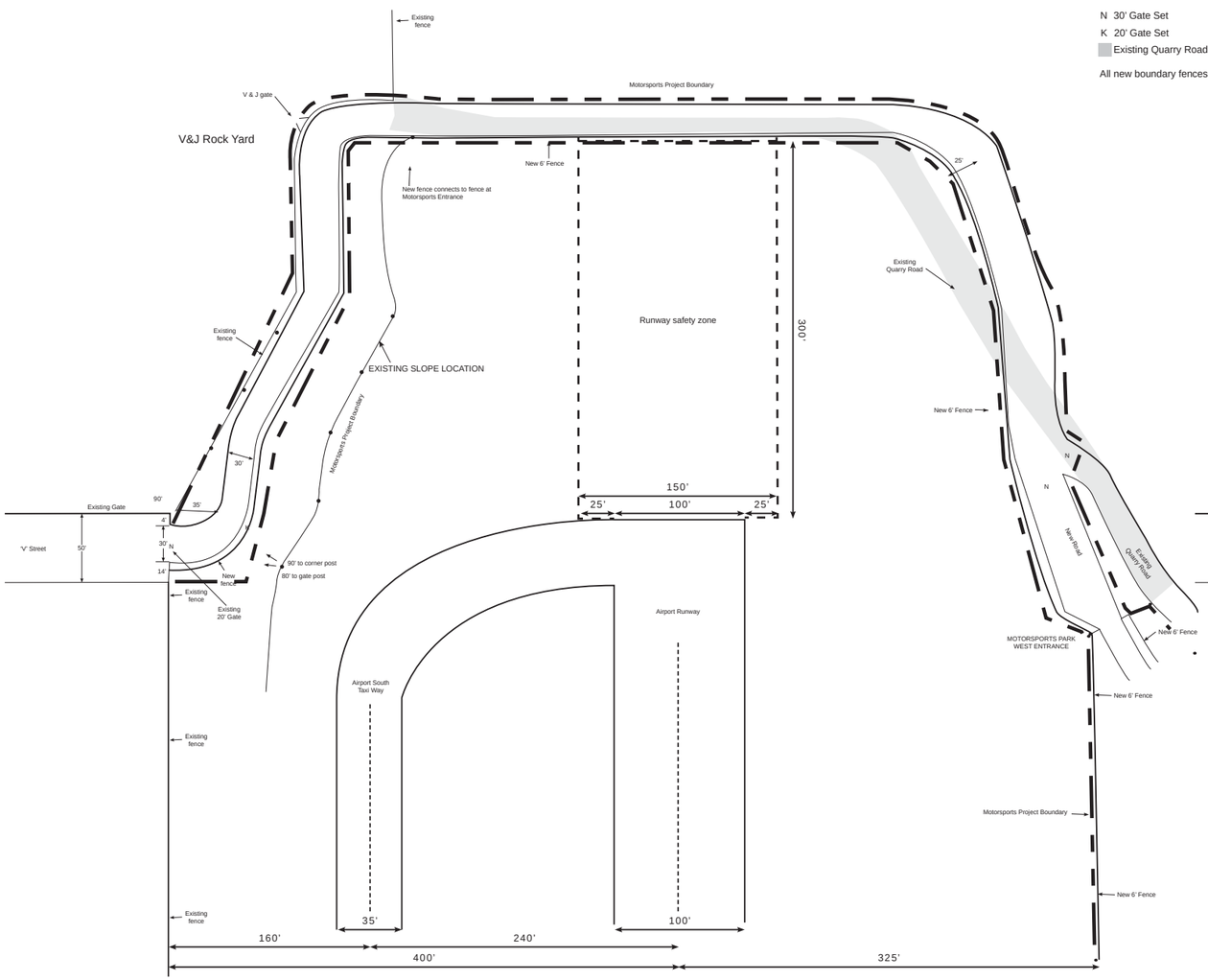
NOTES:
1. All 30' road sections are two-way.
2. Spectators & competitors for weekday use will enter by George Miller Dr.
3. Spectators & competitors for weekend and holiday events will enter by the existing 'V' St. gate.
4. Width from George Miller Dr. road edge to fence varies 10' to 20' east of park west entrance road.

Materials used
10. The drag strip, staging lane, pit area 2 and return & chase lanes and adjoining roads are concrete as shown in detail A4-4 above.
11. Walk paths and accessible parking areas are decomposed granite.
12. Roadways are compacted road base with grades less than 5% and built as shown in details in 1, 2, 3 above
13. The existing paved entry roadway from George Miller Dr. will be re-paved with asphalt to a width of 30 feet to the bottom of the hill, at its current 6% slope.
14. Pea gravel in the drap strip run off area is 12" thick.
Current skydive pea gravel landing pad will be relocated as shown.

GRAPHIC SCALE
0' 200' 400' 600'

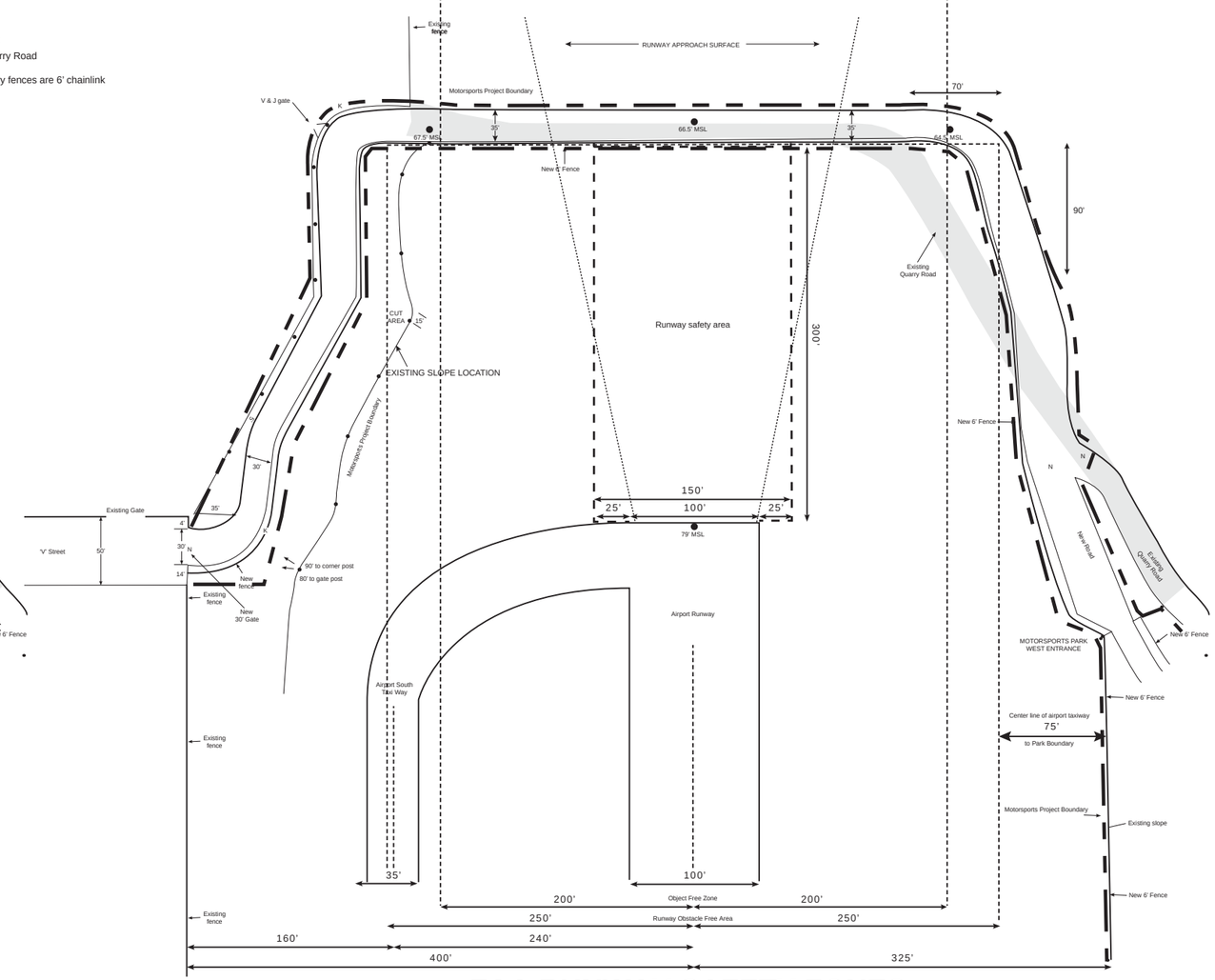
A4A Roads, Fences, Gates

CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park



N 30' Gate Set
K 20' Gate Set
Existing Quarry Road

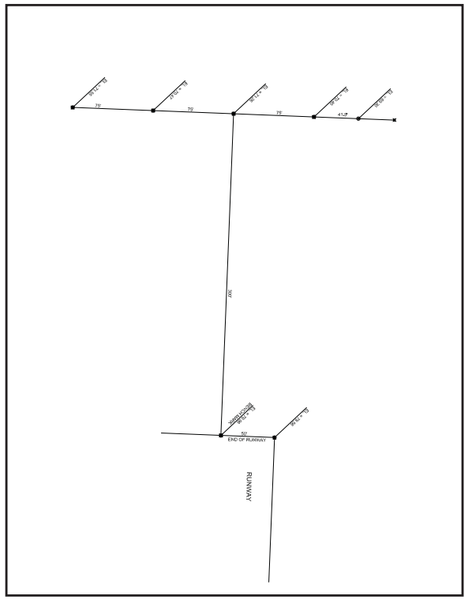
All new boundary fences are 6' chainlink



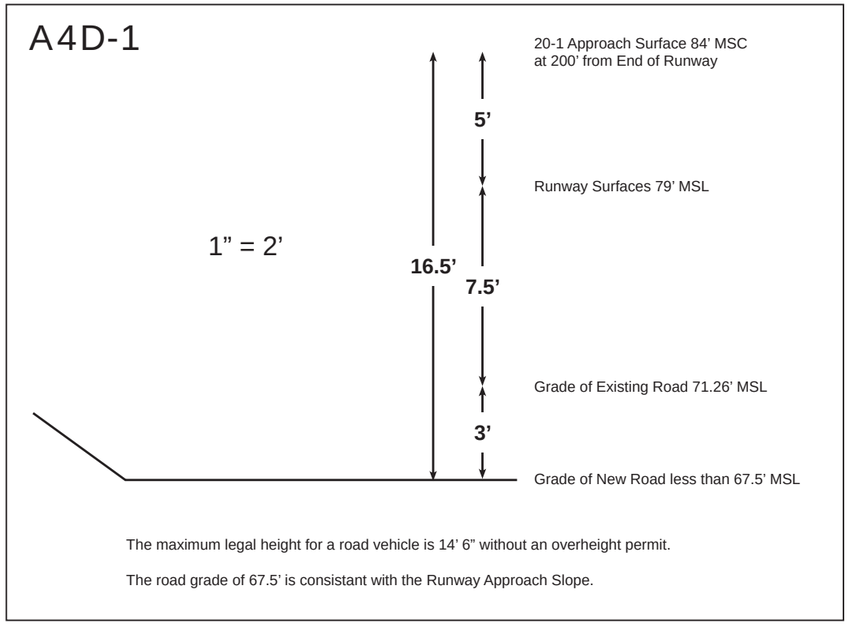
FAA RUNWAY SAFETY ZONES

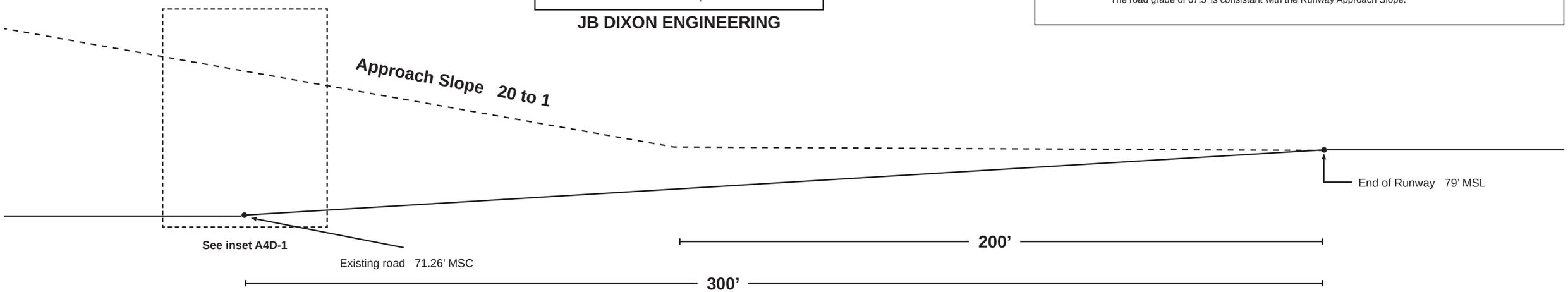
A4B Roads, Fences & Gates (West Entrance) CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

SCALE 1" = 40'



JB DIXON ENGINEERING





A4D End of Runway Road Cross Section CONCEPTUAL EXHIBIT 8-10-16 **Lompoc Valley Motorsports Park**

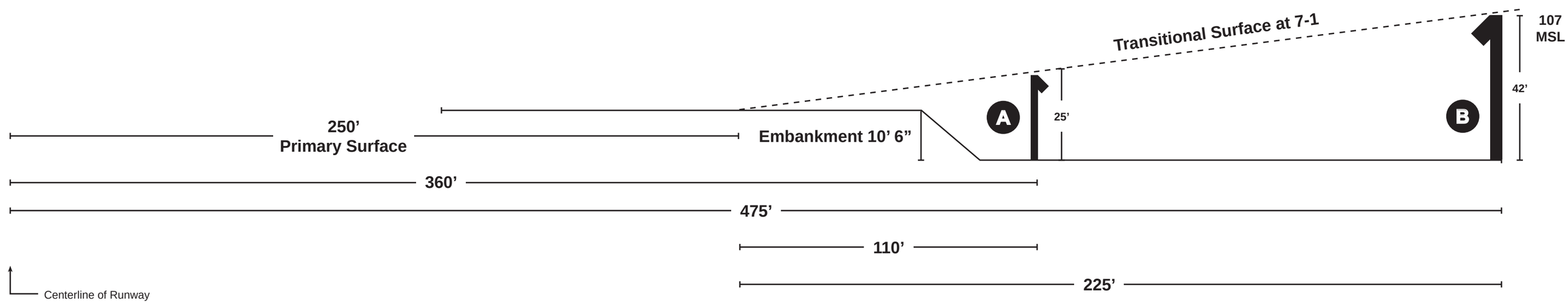
1" = 40'

LIGHT TOWER HEIGHT CALCULATION

Distance from Primary Surface	÷ 7	=	+	Difference in grad from Primary Surface	=	Maximum Tower Height

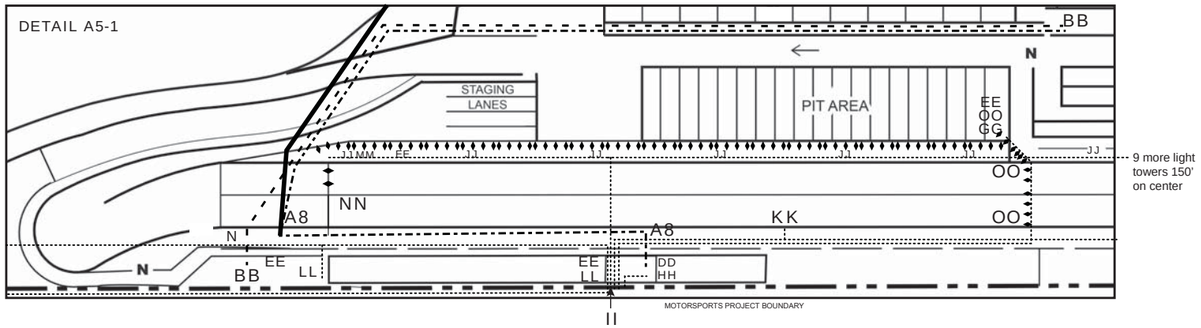
Location A $\frac{110'}{7}$ = 15.8' + 10' = 25.8' 5 @ 25' high with Aircraft Beacon

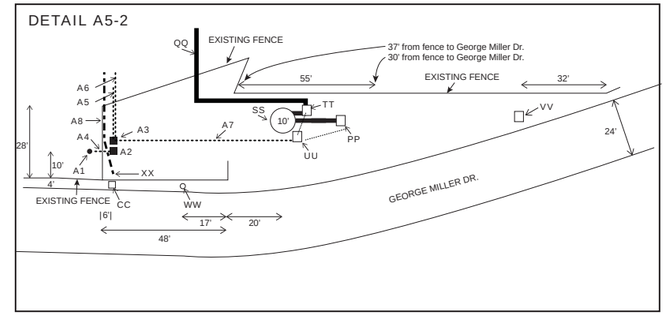
Location B $\frac{225'}{7}$ = 32.1' + 10' = 42.1' 10 @ 42' high with Aircraft Beacon



A4C Transitional Surface Diagram (measures 1' of elevation for 1 foot of lateral distance) CONCEPTUAL EXHIBIT 8-10-16 **Lompoc Valley Motorsports Park**

1" = 10'





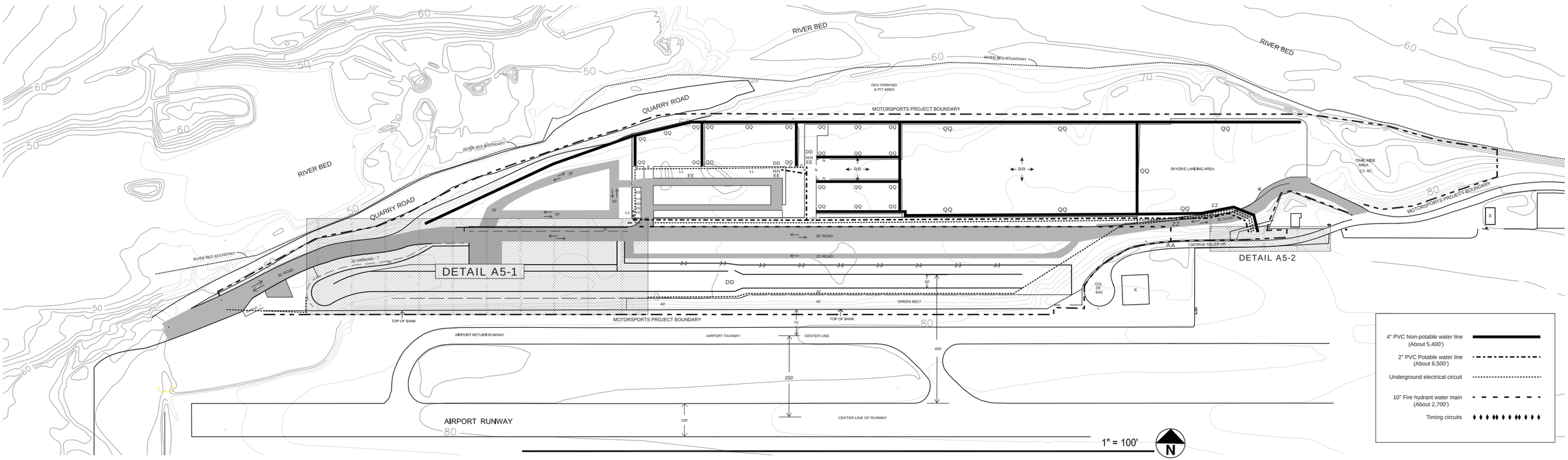
NOTES:

Fire Hydrants and Potable Water Lines
AA. Tap new 10" line into existing line in George Miller Dr. with shutoff valve.
BB. Fire hydrant with shutoff valve (3).
CC. Existing 5/8" potable water meter #14840911 reads 9999.99.
DD. Hose bib for concessions.

Electrical Lines and Breakers
EE. Motion activated night security lighting.
FF. Breaker panel in office trailer for all motorcross park panels.
GG. Circuit to elapsed time trailer.
HH. Circuit for concessions vehicle locations.
II. Dragstrip main panel at top of bank inside 6' boundary fence.
JJ. 42' light towers (16).
KK. Underground circuit to LED scoreboard.
LL. Underground circuits to portable toilet lighting (2)
MM. Underground circuit to timing truck location.
NN. 25' light towers (5).

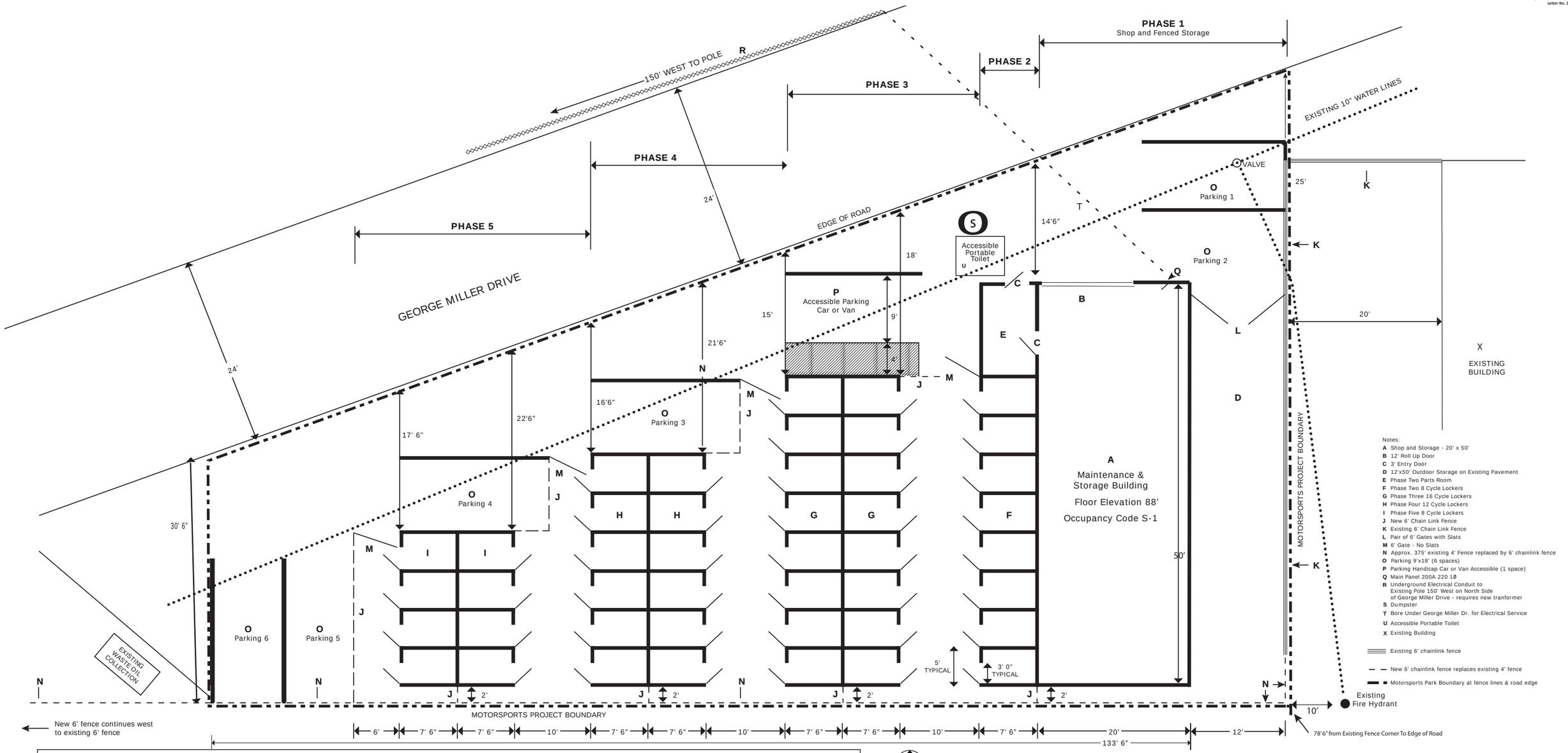
Timing System
NN. Timing circuit from timing truck to christmas tree.
OO. Timing circuit to finish line and elapsed time trailer.
PP. Well with submersible pump and controls (see detail A5-2).
QQ. Non-potable water hose bib with non-potable warning sign in 2" letters.
RR. Sprinkler and hose bib locations will be determined when track is built.
SS. 5000 gallon plastic tank.
TT. Booster pump
UU. Well breaker panel and controls.
VV. Flood control building water meter.
WW. Existing airport street light.
XX. Shut off valve and backflow preventer.
ZZ. Airport storm drain extensions one 10" PVC and one 10" ABS Pipe
A1. Existing power pole.
A2. New 220V three phase transformer.
A3. Meter and main panel.
A4. Underground from pole to transformer.
A5. Underground electrical conduit to drag strip.
A6. Underground electrical conduit to motorcross park.
A7. Underground electrical conduit to well.
A8. Potable water line.

Note
1: Water lines and electrical trenches to be separated by 36" and 12" when crossing each other.
Water and electric utilities are supplied by the City of Lompoc. Sewer, Gas, Telephone and Cable are not connected to the site.



A5 **Utilities** CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

GRAPHIC SCALE
0' 200' 400' 600'



A-6 **Maintenance & Storage Building and Future Storage Lockers** CONCEPTUAL EXHIBIT 7-10-15 Lompoc Valley Motorsports Park

CONSTRUCTION PHASES:

MOU PHASE 4

Construction Phase 1 Site work Plan for full Park and OHV Area.
1. Cut and grind all of the vegetation from all areas within the Park boundary except the Trail Ride Area. Stockpile the grindings at the trail ride area where there is no brush or willows. Remove all of the slabs and debris from the park and the slabs on the adjoining Prison property. Transport all concrete by the quarry road to V & J for processing, to be returned to the park for road base. Recycle the metal and dispose of trash at the Lompoc landfill. Retain any materials found on site that can be re-used. Coordinate removal of the underground tank[s] by the City of Lompoc. [1to4 months]
2. Install the new transformer and main panel at the back of the Sky Dive viewing area. Install the non-potable water well, water tank and other components. Construct the maintenance and storage building which is located on the south side of George Miller Dr. about 300 feet east of the Park entrance and its electrical service. [6 to 9 months]
3. Grading of the entire Motor Sports Park site except trail ride area for all future phases of construction. Spread stockpiled vegetation grindings over the Central Parking Area, Drag Strip safety zones, green belt areas and Pit Area 1. Import additional wood chips from the City of Lompoc as needed. [2-4 months]
4. Extend the potable water line, underground electrical lines, non-potable water line and water line for the fire hydrants to the east edge of the OHV Area. Construct the fences around the sky dive landing area. Refurbish the entry road from George Miller Drive to the bottom of the hill. Construct the road from the bottom of the hill to the east edge of the OHV Area including the Airport storm drain extensions. [1 to 4 months]
5. Move the Sky Dive landing area pea gravel and relocate sky dive to the new landing area. [2 days]
6. Construct roads to and within the OHV track area and Central Parking Area including the temporary fire truck turning area. Extend all utilities from the east boundary of the OHV Area to their finished locations on the plans. Extend the fire hydrant water line and install the fire hydrant. Construct the connector roads from the V Street gate to the quarry road and the Park road from the OHV Area to the west entry gate. [1-3 months]
7. Install the Motorsports Park perimeter fence except trail ride area, the fence on the east side of the quarry road connecting to the airport fence at the V Street gate and fences within the OHV Areas. [3-5 months]
8. Construct the OHV Area tracks and parking area. Install the accessible amenities, trailers, grandstands, storage container and place the portable toilets. [2-3 months]

MOU PHASE 5

Construction Phase 2 Work Plan for the Drag Strip Area.
9. Extend all of the utilities in the Drag Strip Area. Install the time circuits. [2-4 months]
10. Construct the roads and parking areas in the drag strip area. [1-3 months]
11. Construct Pit Area 1. [1 month]
12. Construct the concrete Drag Strip, K rails, pit area 2 and return road. Construct the gravel run off area with net. Assemble the grandstands, install accessible amenities and install the sound system. Install the timing system equipment. Install all fences within the Drag Strip Area. [6-10 months]
13. Place the portable toilets, timing truck or trailer, elapsed time trailer and storage container. [1 month]

MOU PHASE 6

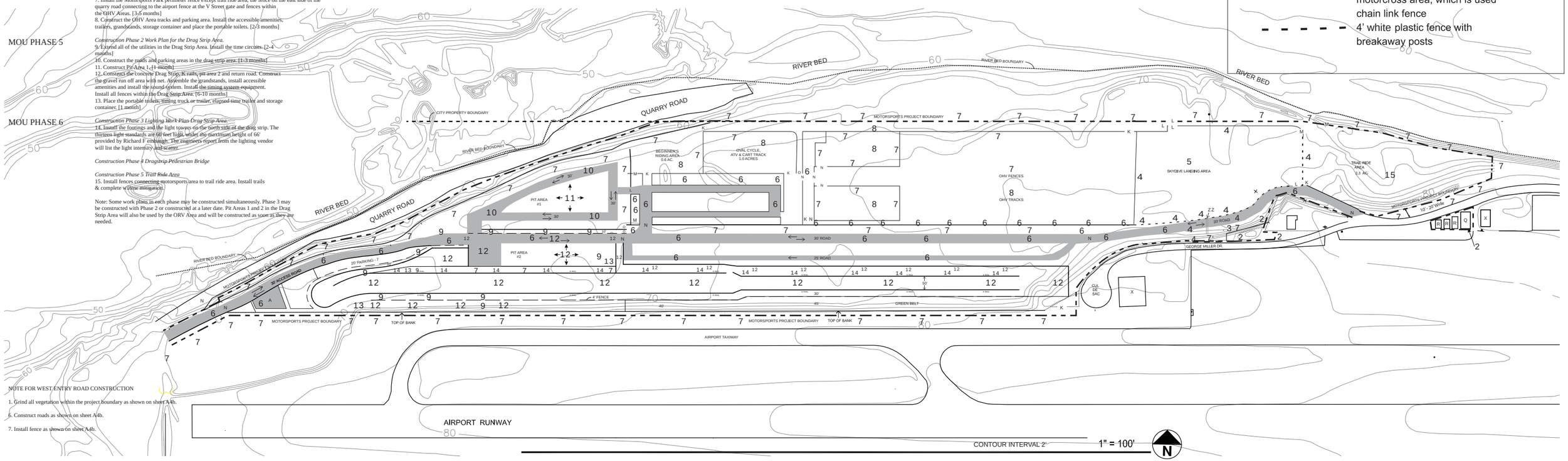
Construction Phase 3 Lighting Work Plan Drag Strip Area
14. Install the footings and the light towers on the north side of the drag strip. The thirteen light standards are 60 feet high, under the maximum height of 66' provided by Richard F embaugh. The engineers report from the lighting vendor will list the light intensity and scatter.

Construction Phase 4 Dragstrip Pedestrian Bridge

Construction Phase 5 Trail Ride Area
15. Install fences connecting motorsports area to trail ride area. Install trails & complete wildlife mitigation.

Note: Some work phases in each phase may be constructed simultaneously. Phase 3 may be constructed with Phase 2 or constructed at a later date. Pit Areas 1 and 2 in the Drag Strip Area will also be used by the ORV Area and will be constructed as soon as they are needed.

A Fire Truck Turning Area (80' Diameter)
All 30' roads and 20' roads in pit areas built for Fire Truck use
K 20' Gate Set
L 15' Gate
M 5' Gate
N 30' Gate Set
O 10' Gate
ZZ Airport PVC storm drain extension at least 6" of compacted soil and 6" of Class II Base.
---------- Existing 6' chain link ence
…… Existing 4' chain link fence
---------- Replace 184' of 4' chain link fence with 6' chain link fence on George Miller Dr.
_____ _____ New 4' chain link fence
_____ New 6' chain link fence except in motorcross area, which is used chain link fence
- - - - - 4' white plastic fence with breakaway posts



NOTE FOR WEST ENTRY ROAD CONSTRUCTION

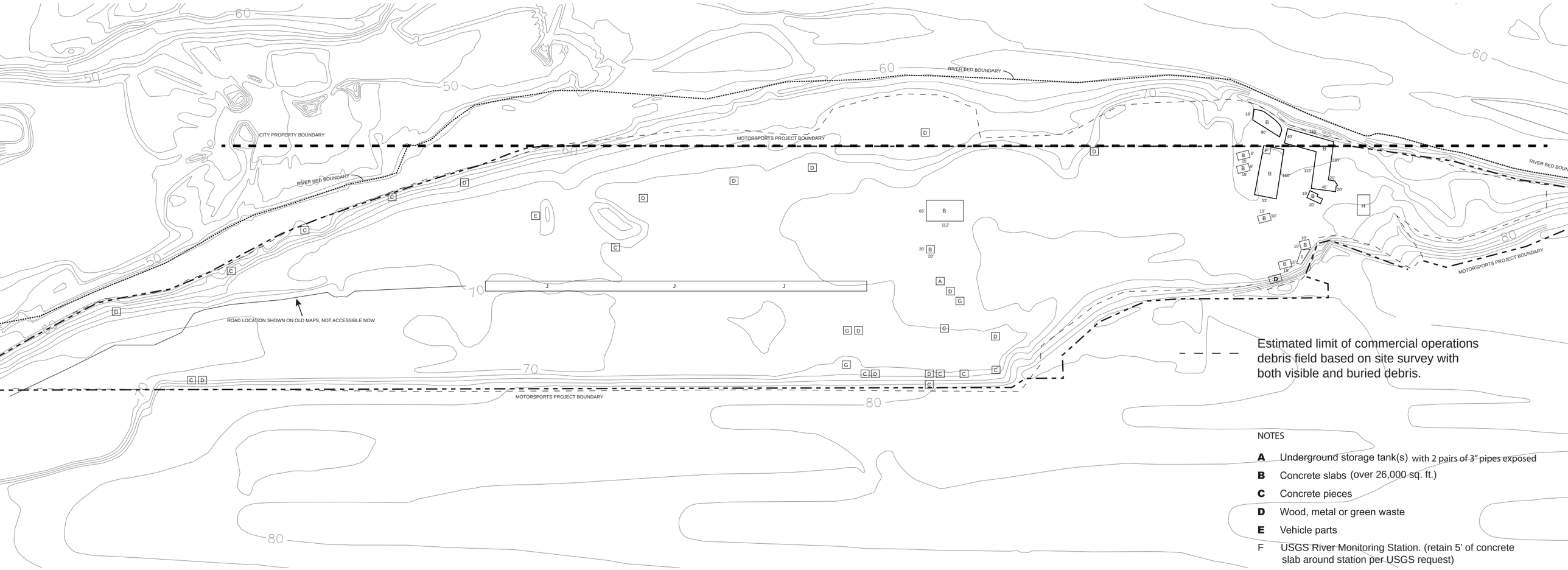
1. Grind all vegetation within the project boundary as shown on sheet A4b.

6. Construct roads as shown on sheet A4b.

7. Install fence as shown on sheet A4b.

GRAPHIC SCALE
0' 200' 400' 600'

A7 MOU Construction Phases & Work Plans CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park



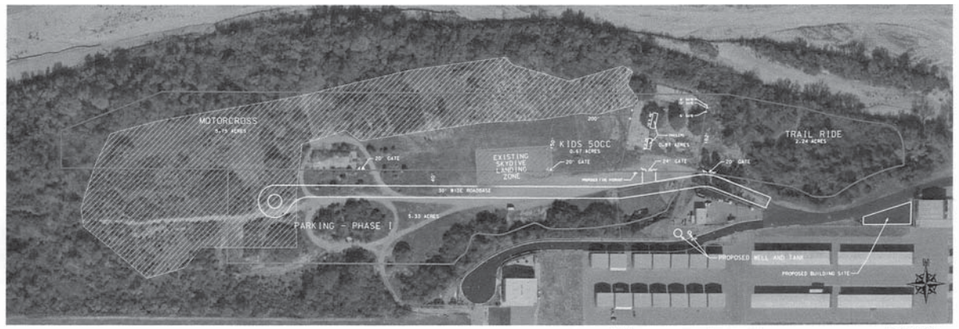
NOTES

- **A** Underground storage tank(s) with 2 pairs of 3" pipes exposed
- **B** Concrete slabs (over 26,000 sq. ft.)
- **C** Concrete pieces
- **D** Wood, metal or green waste
- **E** Vehicle parts
- F USGS River Monitoring Station. (retain 5' of concrete slab around station per USGS request)
- **G** Trash
- **H** Three concrete tank supports to be retained
- **I** Flood control dirt stockpile

CONTOUR INTERVAL 2' 1" = 100' N

GRAPHIC SCALE
0' 200' 400' 600'

A8 **Slabs & Debris** CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park



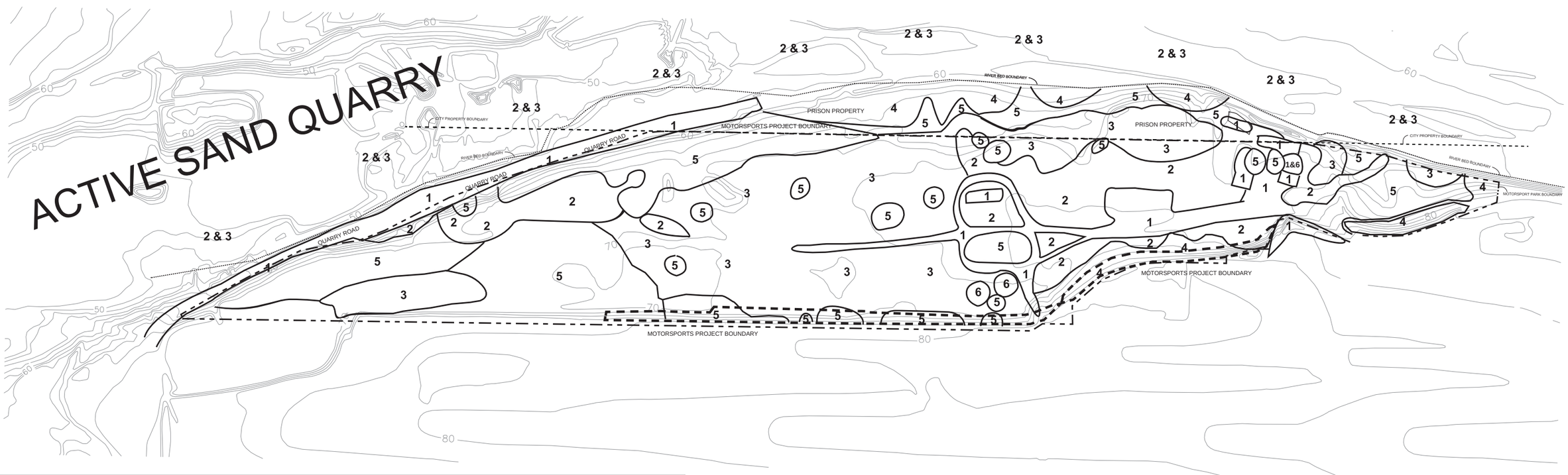
FAILED RUNWAY EXTENSION WILLOW MITIGATION AREA OF 7.1 ACRES

EXHIBIT "A" LOMPOC MOTORSPORTS

NOTES
1: Barren area with some seasonal plants. [Driving areas, concrete slabs and the sky dive pea gravel area].
2: Seasonal plants and grasses. [Previously cleared areas with limited re-growth].
3: Coyote Brush and seasonal plants and grasses. [Previously cleared areas with regrowth as determined by aerial photographs].
4: Willow bunches that appear to be older based on old aerials photographs and plant sizes.
5: Willow bunches that have grown in the developed area or are not contiguous to other willow areas.
6: Trees greater than 4" in diameter at chest height.
The site contains a 7.1 acre area that was designated and planted for willow mitigation for the runway extension many years ago. The plants died and the contractor returned $76,000.00 to the City which is still held by the City. The Committee will partner with the City to incorporate the 7.1 acres in any mitigation required for this project which will be done at another location.

Planned Green Belt Areas that will not be disturbed

Prison Property - Debris will be removed and barren areas replanted with willows. Existing vegetation will not be disturbed.



A-9 Vegetation CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

Scale 1" = 100'

MAGNUM
A General Company

MLT3060 Light Tower

6 kW Mobile Lighting in a Narrow-Bodied Package

The Magnum MLT3060 Light Tower is our most popular model, just the right amount of power with the right amount of illumination. The 4 - 1000 watt 'light assemblies' offers complete flexibility with 360 degree rotation, steadfast to winds up to 65+ mph, sturdy outrigger stability along with five to seven acres of light on the site.

Now available with 60Hz and 50Hz frequency of power output

Features

Tough

- Full tubular steel frame trailer
- 30 foot all-steel mast
- 4 - 1,000 watt metal halide lights
- 4 point outrigger stance withstands 65+ mph winds
- CSA Listed

Reliable

- 4 stroke diesel engine - Mitsubishi or Kubota
- Marathon generator
- Low oil pressure/high temperature automatic shutdowns
- Protective start limit breaker
- Simplar ballast configurations
- Individual light breaker switches & ballast indicator lights
- 1 year Unlimited / 2 year 2,000 hour warranty

Easy to Use

- Adjustable 360 degree mast rotation
- 120V and 240V convenience receptacles
- Lockable cabinet
- DOT running light package on trailer
- Fork guides on the mast and under the trailer

Warranty Responsibility: It is the responsibility and obligation of the purchaser to thoroughly read and understand this Magnum warranty prior to purchasing equipment. Failure to read and comprehend the warranty policy does not expose Magnum to any liabilities over and above the stated warranty bond. If there is any question regarding the application of warranty details please contact warranty@mi-jet.com, or call technical support at 800.526.5766.

Specifications

Engine

Make/Brand	Mitsubishi
Model	L3E-W-803ML
Aspiration	Natural
Type	Diesel, liquid cooled, 4-stroke
Power - Prime **hp (kW)**	10.5 (7.8)
Power - Standby **hp (kW)**	12.2 (9.1)
Operating Speed **rpm**	1800
Displacement **cubic in (L)**	57.97 (0.95)
Cylinders	3
Fuel Consumption - Prime **gph (Lph)**	0.47 (1.78)

Generator

Make/Brand	Marathon Electric
Type	Brushless
Insulation	F

Generator Set (Engine/Gen)

Output - Standby **kW (kVA)**	6.0 (6.0)
Output Voltage **V**	120/240
Output Amperes **120V (240V)**	50 (25)
Frequency **Hz**	60
Power Factor	1.0 (1 Phase)

Lighting

Lighting Type	Metal halide
Ballast Type	Coil & core
Lumens	440,000
Coverage **acres (sq. meters)**	5 - 7 (20,234 - 28,328)

Capacities

Fuel Tank **gal (L)**	30 (114)
Coolant (incl. engine) **qt (L)**	4.5 (4.3)
Oil (incl. filter) **qt (L)**	3.8 (3.6)
Maximum Run Time **hrs**	64

Size and Weight

Maximum height of tower **ft (m)**	30 (9.14)
Length w/ mast stowed **in (m)**	170 (4.32)
Width **in (m)**	49 (1.25)
Width w/ outriggers extended **in (m)**	98 (2.49)
Height w/ mast stowed **in (m)**	68 (1.75)
Dry Weight **lbs (kg)**	1640 (744)
Operating Weight **lbs (kg)**	1853 (841)

Electrical Distribution

Circuit Breaker Size	30
Voltage Selection	N/A
Voltage Regulation	Capacitor +/-4%
AC Voltage - 1 Phase	120, 240
Battery Voltage (qty per unit)	12V (1)
Battery Rating	440 CCA
120V-20 amp GFCI Duplex - qty	1
240V-30 amp Twist Lock - qty	1
240V-50 amp Twist Lock - qty	N/A

Trailer

Number of Axles	1
Capacity - Axle Rating **lbs (kg)**	2200 (998)
Tire Size **in**	13
Brakes	N/A
Hitch	2" Ball
Maximum Tire Pressure **psi**	30

Options

Powermax (Engine/Gen)	• 60/40 Coolant • Engine Heater (Lower Radiator Hose) • Alternative Engine - Kubota • Oil Drain Valve Kit • Cold Weather Belt (Mitsubishi only)
Controls	• Battery, 720 CCA Gel Cell • Battery, 720 CCA Wet Cell • Battery, 440 CCA Gel Cell • No Battery • Battery Disconnect, Lockable • Autolight Controller • Battery Charger, 5 Amp
Cabinet/Fuel Tank	• Level Indicator • Interior Cabinet Light • Cap, Fuel Tank - w/ lanyard • Spare Tire & Carrier
Trailer	• Jack, Tube & Sleeve • 2 5/16" Ball • Combo Hitch - 2.5" Ring/2" Ball • 3" Ring • 2.5" Ring • Air Freight/Sea Container Racking • Manual Parking Brake • Electric Brakes
Mast Winch	• High Pressure Sodium Lights • Quick Disconnect Lights • Drope Cord • Galvanized Mast • Electric Winch • Electric Winch, Battery Disconnect

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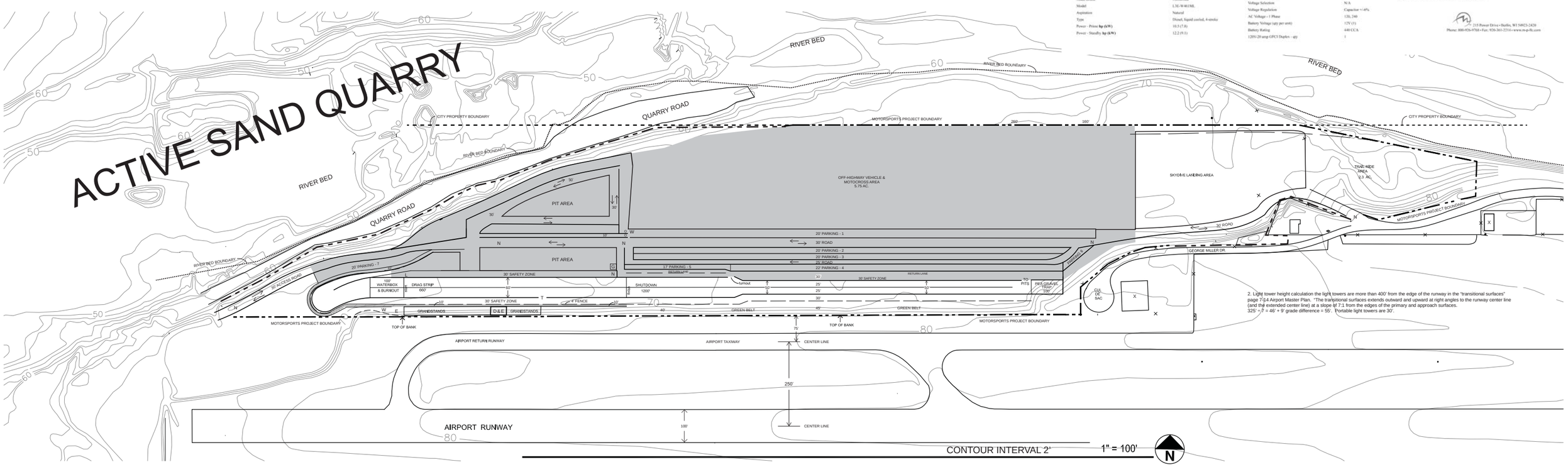
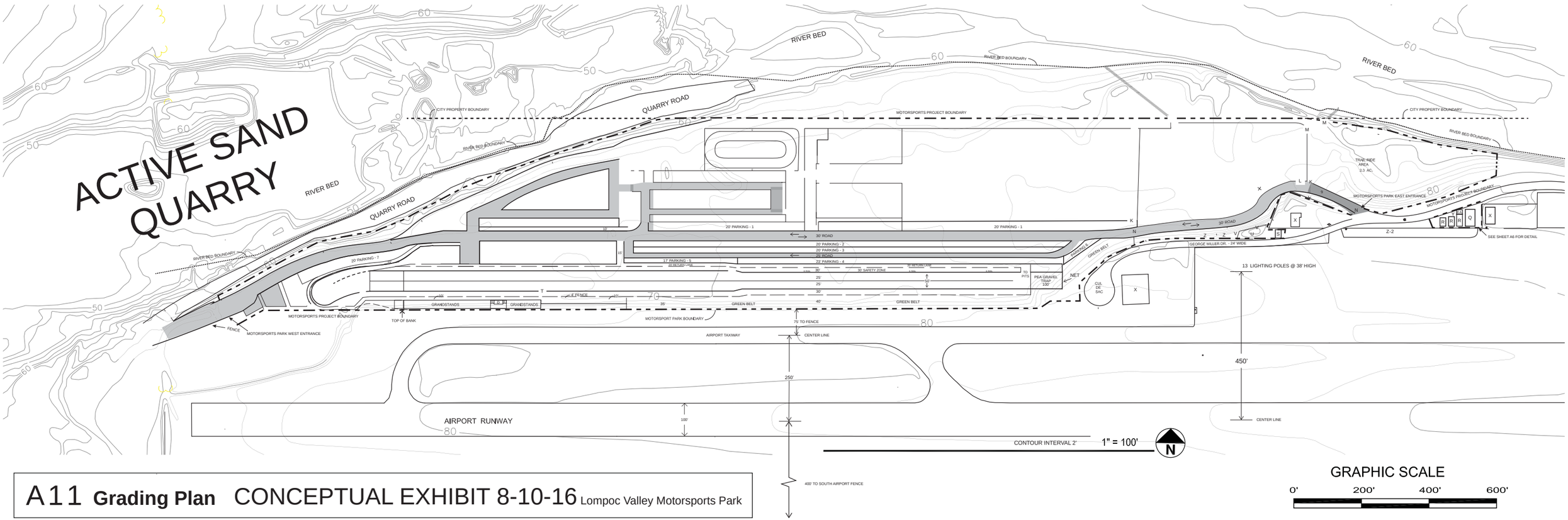


2. Light tower height calculation the light towers are more than 400' from the edge of the runway in the "transitional surfaces" page 7-14 Airport Master Plan. "The transitional surfaces extends outward and upward at right angles to the runway center line (and the extended center line) at a slope of 7:1 from the edges of the primary and approach surfaces.
325' ÷ 7 = 46' + 9' grade difference = 55'. Portable light towers are 30'.

A10 **Locations Portable Light Towers May Be Used** CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

GRAPHIC SCALE
0' 200' 400' 600'



A11 **Grading Plan** CONCEPTUAL EXHIBIT 8-10-16 Lompoc Valley Motorsports Park

Letter No. 11: Carl Creel, Motorsports Park Committee Chairman and John H. Linn, Foundation Chairman, Lompoc Valley Parks, Recreation, and Pool Foundation, August 15, 2016

Response 11-1

As stated in the CEQA Guidelines Section 15126.4, the Lead Agency must exercise its independent judgment as to the significance of all impacts, based on scientific and factual data (State CEQA Guidelines Section 15064(b)), and it must select and adopt mitigation measures to reduce significant impacts to less-than significant levels, where feasible.

Response 11-2

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Further, as stated in the Draft EIR, Section 5.0, Alternatives, "Overall, the OHV Facility Only Alternative would not meet the proposed Project's purpose and the objectives that support the proposed Project's purpose to the same extent as the proposed Project. Therefore, this alternative, while environmentally superior to the proposed Project is not considered as feasible and should be eliminated from further consideration."

Response 11-3

The public agency that has the principal responsibility for carrying out or approving a project is designated as the "Lead Agency" under CEQA. For the proposed Project, the City is the Lead Agency. As such, the City is responsible for ensuring that the EIR satisfies the procedural and substantive requirements of CEQA and for considering and certifying the adequacy and completeness of the EIR prior to making any decision regarding the proposed Project.

Please also refer to Topical Response 6, Mitigation Area, which provides additional information on the required mitigation area, including its proposed location and the agencies responsible for the 7.1-acre mitigation area.

A portion of the proposed Project is being funded by the California Department of State Parks, Off-Highway Motor Vehicle Recreation (OHMVR) grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the off-highway vehicle (OHV) areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Response 11-4

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-5

Please refer to the Draft EIR, Section 4.2, Air Quality, which states "the proposed Project would include the phased development of the Project site as two park areas, as illustrated in **Figure 3.0-3, Conceptual Site Plan.** The first park area would include the OHV area, which would relocate the existing Kids Moto Fun Park from River Park and include a one-eighth-mile oval dirt track, as well as a 7-acre multitrack OHV area. In addition, the OHV area would include a 2.3-acre, low-speed trail-riding area open to motorcycles, mountain bikes, and all-terrain vehicles (ATV), each at different times. The second park area would include an International Hot Rod Association (IHRA)–sanctioned one-eighth-mile drag strip with grandstands and pit areas. The skydiving landing area would be relocated to the west of the proposed entrance from George Miller Drive."

Please also refer to Page 4.2-20 for detailed Project air quality analysis methodology.

Response 11-6

Please refer to Response 11-5.

Response 11-7

Please refer to Page 4.2-30 which states "The proposed Project would be consistent with the 2013 CAP and would result in less than significant construction related air quality impacts. Stationary and maximum operational emissions generated by the proposed Project would fall below SBAPCD thresholds and, as such, would result in less than significant impacts." Please refer to the summary of project related air quality impacts as provided on page 4.2-30.

Response 11-8

Please refer to Response 11-5.

Response 11-9

Please refer to the Draft EIR, Section 4.2, Air Quality, which states the Construction period of approximately 2 years beginning January 2017 and ending by December 2018. Construction would occur over five phases: (1) Site Preparation which would last approximately 30 days, (2) Grading for approximately 55 days, (3) Building Construction for approximately 39 days, (4) Paving for approximately 45 days, and (5) Drag Strip paving for approximately 340 days.

Also, please refer to response 11-5.

Response 11-10

Please refer to Topical Response 6, Mitigation Area, which states that the City remains obligated to complete the Runway Expansion Mitigation pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW).

As noted in the Draft EIR (page 4.9-36), implementation of the proposed Project would utilize the area set aside for Runway Expansion Mitigation Project.

Loss of the 7.1 acres on site would preclude the City from again providing for that replanting. If that mitigation is still required, then that would result in a significant impact.

Given the motorsports park would occupy most of the area initially identified to accomplish the restoration effort associated with the Airport Runway Expansion Project, the City would be required to reestablish a mitigation area at another location.

The Draft EIR (page 4.9-38) identifies the following mitigation measure if that replanting requirement is still applicable:

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

With implementation of **Mitigation Measure MM 4.9-7**, impacts related to the loss of the mitigation area would be reduced to less than significant.

It should be noted, if that replanting is still required, then any future mitigation site may be subject to review and approval by CDFW and would be subject to the conditions of SAA No. 5-2001-0252. CDFW may request additional conditions if an alternate location other than the original mitigation site is utilized.

Response 11-11

Please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB). As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval; if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 11-12

Please refer to response 11-11.

As discussed, the FAA approved the City's proposed Airport Layout Plan (ALP) in 2011. The approved ALP does not include any improvements in the area where the proposed Project is to be located. Currently, the ALP is being updated to include additional improvements including Motorsports Project, a sewer line running sub-surface, and a capital improvement plan to upgrade electrical features and rehabilitate the Airport's north apron. In addition, the Lompoc Airport Master Plan Update does not include any future improvements within the proposed Project's boundaries. Any revisions to the ALP are subject to review and approval by the FAA before the City can implement the proposed Project.

Response 11-13

Hard copies of the Draft EIR containing all appendices were located at the City Planning Department and at the City public library.

Section 4.13 of the Draft EIR analyzed impacts based on the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on traffic with **Mitigation Measures MM 4.13-1** and **4.13-2**.

Response 11-14

This comment is noted. Response 11-11 and Topical Response 8 which provides reference to the existing sky dive landing area criteria.

As noted in Section 5.0 of the Draft EIR, implementation of the proposed Project would provide an opportunity for the area of the mitigation from the Lompoc Runway Extension Project contained within the proposed Project site which was planted with willows twice, to be implemented again, if required. As noted in Topical Response 6, if a determination is made the City remains obligated to again make efforts to accomplish those replantings as described in the Runway Expansion Mitigation pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW), then that funding is available for that.

Please refer to Table 5.0-1, Alternative 2, of the Draft EIR which does identify greater impacts under this alternative.

Section 15126.6 (f) of the CEQA Guidelines discusses the rule of reason stating alternatives need to be analyzed if they feasible and meet most of the Project objectives. Section 5.0 of the Draft EIR explains why alternatives were selected for consideration and it was noted in Section 5.0 of the Draft EIR that none of the alternatives met the Project objectives (page 5.0-38 and 5.0-39).

Response 11-15

Section 7.2 of the Draft EIR includes a summary of significant irreversible effects as required by CEQA Guidelines Section 15126.2(c).

The City Council, as the lead agency, has the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. As noted in the CEQA Guidelines, Section 15093:

> *(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
>
> *(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
>
> *(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts.

The information will be forwarded on to the decision makers.

Response 11-16

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-17

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-18

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-19

Please refer to Section 5.0 of the Draft EIR for a full description of Alternatives.

Response 11-20

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-21

Section 4.3 of the Draft EIR analyzed potential impacts to biological resources and including mitigation measures as applicable as analyzed by a qualified biologist. Mitigation measures may be adjusted unless approved by the City Manager, or designee, or an approved biologist.

Response 11-22

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-23

Please refer to Topical Response 8 regarding the operation of SDSB. As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval; if approved, it would comply with FAA regulation for PLA.

Response 11-24

Distances to various locations throughout the Draft EIR are all approximate.

Response 11-25

Parking lot noise is analyzed in the Draft EIR as part of the proposed Project potential impacts. Impacts from parking lot noise were found to be less than significant.

Response 11-26

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-27

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-28

The Draft EIR analyzed impacts based on the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on Traffic. Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-29

The Draft EIR analyzed impacts based on the proposed Project Description. The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-30

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-31

The Draft EIR analyzed impacts based on the proposed Project Description. Proposed water usage used factors from the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on utilities. Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-32

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

The Draft EIR analyzed impacts based on the proposed Project Description. Proposed water usage used factors from the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on utilities. Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-33

The Draft EIR analyzed impacts based on the proposed Project Description. Electrical calculations used factors from the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases or utilities.

Response 11-34

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-35

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-36

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-37

The Draft EIR analyzed impacts based on the proposed Project Description. Air quality and greenhouse gas calculations used factors from the proposed Project Description and mitigation is proposed as applicable. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases. Please refer reference 13-1 regarding impacts to air quality.

The Draft EIR provides this information to decision makers of the impacts of a Project on the environment. The City Council, as the lead agency, has the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. As noted in the CEQA Guidelines, Section 15093:

> *(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
>
> *(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to*

support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts.

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-38

The Draft EIR analyzed impacts based on the proposed Project Description. Air quality and greenhouse gas calculations used factors from the proposed Project Description and mitigation is proposed as applicable. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases. Please refer reference 13-1 regarding impacts to air quality.

The Draft EIR provides this information to decision makers of the impacts of a Project on the environment. Lead agencies have the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. See response 11-37 for CEQA Guidelines, Section 15093 for details.

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts.

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-39

Please refer to Response 11-38.

Response 11-40

Please refer to Response 11-38.

Response 11-41

The Draft EIR analyzed impacts based on the proposed Project Description. Air quality and greenhouse gas calculations used factors from the proposed Project Description and mitigation is proposed as applicable. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases. Please refer reference 13-1 regarding impacts to air quality.

The Draft EIR provides this information to decision makers of the impacts of a Project on the environment. Lead agencies have the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. See response 11-37 for CEQA Guidelines, Section 15093 details.

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts.

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-42

Please refer to Response 11-41.

Response 11-43

The Draft EIR provides an evaluation of the methodologies used and potential impacts to biological resources in Section 4.3, Biological Resources. The information provided in the Draft EIR is based on previous regional and area biological studies including *Habitat and Natural Resources Assessment for the Lompoc Motorsports Park* prepared by BioResource Consultants Inc. (see Appendix 4.3), as well as information available from the CDFW, the California Natural Diversity Database (CNDDB), California Native Plant Society Electronic Inventory (CNPS), and US Fish & Wildlife Service (USFWS).

The Draft EIR analyzed impacts based on the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on biological impacts.

Please refer to Topical Response 2 regarding biological resources and Topical Response 4, Indirect Biological Resource Impacts regarding indirect biological resource impacts.

The studies mentioned were conducted as part of mitigation measures as describe in Section 4.3 Biological Resources of the Draft EIR.

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 11-44

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-45

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-46

The Draft EIR analyzed impacts based on the proposed Project Description. Greenhouse gas calculations used factors from the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases.

Response 11-47

The Draft EIR analyzed impacts based on the proposed Project Description. Electrical calculations used factors from the proposed Project Description. The Draft EIR found no significant impacts from the proposed Project on greenhouse gases or utilities.

Response 11-48

Please refer to Response 11-38.

Response 11-49

Please refer to Response 11-46.

Response 11-50

Please refer to Response 11-46.

Response 11-51

The commenter is directed to Topical Response 3, Hydrology regarding hydrology for additional information.

As discussed in Section 4.8 Hydrology of the Draft EIR, the proposed Project would not allow stormwater flow from the project site to the Santa Ynez River, and would provide for surface water to be collected at two proposed infiltration basins.

Response 11-52

Please refer to response 11-51 regarding stormwater on site.

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-53

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Please refer to Topical Response 8 regarding the operation of SDSB. As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval; if approved, it would comply with FAA regulation for PLA.

As stated in Comment Letter 2, CDFW will make a final determination of the 1602 jurisdiction upon Project approval and receipt of notification for a SAA.

Response 11-54

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-55

Please refer to response 11-26.

Response 11-56

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-57

The Draft EIR analyzed impacts based on the proposed Project Description. Comment regarding traffic is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes to the signage plan.

Response 11-58

Section 3.0 of the Final EIR shows the corrected changes to page 4.14.1-14 of the Draft EIR include two fire hydrants along the fire hydrant water main and changing the water line from galvanized to PVC.

Response 11-59

The Draft EIR analyzed impacts and alternatives based on the proposed Project Description. The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-60

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

Response 11-61

Please refer to Response 11-38.

Response 11-62

The studies mentioned were conducted as part of mitigation measures as describe in Section 4.3 Biological Resources of the Draft EIR.

Response 11-63

The comment requests changes to correction to phrasing, words and typographical errors. See **Section 3.0** of the Final EIR for the corrected changes.

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AUG 15 2016

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August 15, 2016

Lucille Breese
Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

RE: Motorsports Park Draft EIR

Dear Ms. Breese,

Santa Barbara County Action Network is a countywide grassroots organization that works to promote social and economic justice, to preserve our environmental and agricultural resources, and to create sustainable communities.

The Draft EIR for the proposed Motorsports Park and drag strip does not adequately identify and evaluate the significant negative environmental impacts of the project and must not be certified. While the document is inadequate to justify approval of the project, it does contain information that provides good reason for the city to deny the project. 12-1

First, consider the noise impacts. There are nearly 3,000 residents in homes within one mile of the proposed project. The city's 2030 General Plan, recognizing that airplanes generate a fair amount of noise, requires that additional noise sources in excess of 60dB should not be allowed in areas affected by airplane noise. 12-2

The DEIR says the proposed park would add a noise source level of 88dB to the area outside of the project property line. This is several times louder than what the General Plan allows. The DEIR wrongly states that noise is not a significant impact. Instead, this inconsistency with the General Plan should be cause for identifying a Class 1 significant and unavoidable impact. The city should deny the project on the basis of this inconsistency alone.

The DEIR does acknowledge Class 1 significant and unavoidable impacts for emissions of toxic air pollutants, including particulates. This is a compelling cause for project denial. The DEIR fails to account for the practice of racers warming up their tires by spinning them for 30 seconds or so on the pavement creating strong odors and particulates breathed by participants, observers and neighbors. 12-3

The DEIR says that the Santa Ynez River will not be harmed by the project. Runoff from the operation—which will obviously include copious amounts of petroleum products, including the remnants of smoking tires—will be directed into "infiltration ponds." So, the polluted runoff will apparently work its way to the Valley's groundwater rather than being dumped directly into the riverbed. 12-4

SB*CAN* page 2

Although it notes that on-site runoff will be directed into ponds, the DEIR fails to consider the potential impact of project-related pollutants on the groundwater. 12-4

The DEIR considers the 200-gallon-per-minute capacity of the proposed on-site water well to be "relatively low capacity" and therefore finds that the use of groundwater to control dust is not a significant impact. Certainly if the project is approved the dust will need to be controlled, but there is no basis to conclude that use of this amount of groundwater is insignificant. 12-5

The DEIR also concludes that the use of 7.95 acre-feet per year of potable water is not a significant impact. Because this is only 5 percent of the projected future demand for commercial, industrial and institutional sectors, the document states that the city has adequate supplies to meet the demands of the project. This is an inadequate analysis; 5 percent for one project is a large share, not an insignificant share. 12-6

On page 4.7-21 the DEIR correctly notes that the proposed project will neither decrease nor increase the number of takeoffs and landings at the airport. It incorrectly, however, jumps to the conclusion that the probability of accident/safety hazard risk would therefore be similar with or without the proposed project. In fact, the risk will be far greater because large numbers of people will be gathered in close proximity to the airport. In the event of an aircraft crash, there will be a much greater chance that people on the ground will be injured and killed. This increased risk should be deemed a significant impact. 12-7

We need to take care of our environment. This is why California's environmental laws require that an "environmentally superior alternative" be identified for any significant proposed project. In this case, for reasons made clear in the DEIR, the "environmentally superior alternative" is identified in the DEIR as the "No Project/No Development Alternative." The DEIR has many inadequacies and should not be certified, but there is ample information in it for the City Council to adopt the "environmentally superior alternative" and deny the project. 12-8

Sincerely,

Ken Hough
Executive Director

Letter No. 12: Ken Hough, Executive Director, Santa Barbara County Action Network, August 15, 2016

Response 12-1

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 12-2

Please refer to Topical Response 7, Noise which addresses issues related to the type and level of noise that would be generated by the proposed uses within the Motorsports Park.

Response 12-3

As discussed in **Mitigation Measure MM 4.2-1** in Section 4.2, Air Quality, of the Draft EIR, a Fugitive Dust Control Plan shall be prepared and submitted to the City and Santa Barbara County Air Pollution Control District (SBAPCD) for review and approval before Project operation. Measures within the Fugitive Dust Control Plan include, paved on-site access roads extending from George Miller Drive and V Street, open and riding trail areas limited to 14 off-highway-vehicles (OHVs) per hour and the requirement all ground surfaces within OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent. The Fugitive Dust Control Plan would control emissions of airborne particulate matter to ensure the levels are below the 8 $\mu g/m^3$ SBAPCD threshold. Dust impacts to wildlife species were determined to be less than significant.

Also, please see responses to Comment letter 8 from the Santa Barbara County Air Pollution Control District.

Response 12-4

Please refer to Responses 2-14 and 2-15.

Response 12-5

Please refer to Topical Response No. 3, Hydrology and Response 63-2.

Response 12-6

Please refer to Response 2-18 and to Topical Response No. 3, Hydrology and Response 63-2.

Response 12-7

Please refer to Topical Response No. 1, Airport Safety, which addresses the risk of aircraft accidents as a result of the proposed Project and Airport designated Safety Zones and the allotted distance between the recreational park—specifically the grandstands—and the landing/takeoff area.

Response 12-8

Please refer to Response 2-19 which addresses the Project alternatives, including the No Project Alternative.

We ge C e cal

COPY

From: silvertrike1@comcast.net [mailto:silvertrike1@comcast.net]
Sent: Tuesday, June 28, 2016 3:40 PM
To: Breese, Lucille
Cc: silvertrike1@comcast.net
Subject: Motorsports Park Environmental Impact Report

Ms. Breese.

The EIR concerning the motorsports facility seems complete and unbiased but having discussed this project with others from Stonebrook (my home), Glen Ellen, The Willows and the Airport, I have yet to find anyone in favor of such a project at the proposed location. Without exception residents nearby expressed concern (some vehemently) about noise, dust and air pollution and erosion of property values. As a former owner/operator of a flying service my concern would be dust and corruption blown in by a prevailing northwest wind especially during re-fueling and aircraft maintenance as well irritation to arriving and departing passengers. Also I understand the skydiving operation (a positive economic factor) would be forced to vacate. 13-1 13-2

Most of the people I talked to do not oppose the motorsports park idea (myself included), but NOT at this location in such close proximity to residential and other conflicting commercial areas. I would think such a venture would open the door for a class action lawsuit against Lompoc by nearby residents due to a reduction in property values. This venture would clearly have a lasting negative impact on many more citizens than the few who would benefit. 13-3 13-4

Sincerely,
Paul & Jacqueline Graybill
609 Northbrook Dr.
735-2186

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JUN 29 2016

Planning Division

1

Letter No. 13: Paul and Jacqueline Graybill, June 29, 2016

Response 13-1

The Draft EIR provides analysis of potential impacts from the proposed Project in relation to Air Quality (see Draft EIR, Section 4.2) and Noise (see Draft EIR Section 4.10).

With regard to air quality and dust specifically, see pages 4.2-24–26 of the Draft EIR, which provide analysis of emissions for particulates (PM10 and PM2.5).

The Draft EIR determines, as shown in **Table 4.2-7, Air Quality Increment Change Criteria**, the proposed Project would not contribute to cumulatively significant air quality impacts during construction. As shown in **Table 4.2-1, Ambient Air Quality Standards** of the Draft EIR, the South Central Coast Air Basin (SCCAB) is in nonattainment for ozone and PM10. The unmitigated emissions from the proposed Project would not exceed thresholds for PM10. As shown in Table 4.2-8, Construction Emissions (tons/year), all stationary emissions associated with the proposed Project would not exceed the SBCAPCD-recommended thresholds and, therefore, would not result in a cumulatively considerable net increase of any criteria pollutant. As such, impacts from dust would be less than significant.

The Draft EIR notes the emissions presented in Table 4.2-7 include project design features and efforts to comply with applicable SBCAPCD rules to reduce emissions during construction activities. Construction activities would require use of watering to minimize fugitive dust, reduce vehicle speeds to 15 miles per hour, cover soil stockpiled for more than 2 days, minimize dust generation after construction activities, and monitor dust control to prevent dust off site. The Draft EIR found construction activities associated with the development of the proposed Project would not exceed short-term construction emissions thresholds for PM10 and PM2.5. Construction impacts would be less than significant.

The Draft EIR notes various scenarios were evaluated with regard to operation of the motorsports park. To determine the worst-case analysis, the air quality analysis included dispersion modeling with the following inputs: the access road, parking lots, pit areas, and races on the Oval Cart Track, Motocross Track, Stadiumcross Track, and Endurocross Track. The modeling results indicated the proposed Project could result in between 154.09 $\mu g/m^3$ and 346.03 $\mu g/m^3$ of particulate matter. The particulate matter threshold for a 24-hour exposure is 8 μ/m^3 of particulate matter. It should be noted the OHV events are the primary generator of particulate matter. Therefore, particulate matter impacts would be potentially significant for both scenarios.

To reduce dust emission, the Draft EIR identifies the following mitigation:

MM 4.2-1 A Fugitive Dust Control Plan shall be prepared and submitted to the City of Lompoc and Santa Barbara County Air Pollution Control District (SBCAPCD) for review and approval, before operation of the proposed motorsports park facility. The Fugitive Dust Control Plan shall be implemented and shall include measures to control emissions of airborne particulate matter associated with on-site off-highway vehicle (OHV) and drag strip activities sufficient to ensure particulate matter is below the 8 $\mu g/m^3$ threshold. Measures to be included in the Fugitive Dust Control plan to control operational emissions shall include, but are not limited to, the following:

- On-site access roads extending from George Millar Drive and V Street shall be paved.
- The Open Riding and Trail area shall be limited to 14 OHVs per hour.
- All ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent.

MM 4.2-2 The motorsports operator shall limit the number of OHV vehicles, OHV races, and length of OHV events based on the anticipated weekend events for concurrent operation of the Oval Cart Track and Stadium Cross events in accordance with the following requirements:

- Restrict the operation of the oval cart track events to 2 races per hour for 6 hours each weekend day.
- Restrict the operation of stadium cross events to 2 races per hour for 6 hours each weekend day.

MM 4.2-3 When the Oval Cart Track and Stadium Cross events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Enduro Cross event in accordance with the following requirement:

- Restrict the endurocross track events to 2 races per hour for 6 hours each weekend day.

MM 4.2-4 When the Oval Cart Track and Stadium Cross events or the Enduro Cross Only events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Motor Cross event in accordance with the following requirement:

- Restrict motorcross events to 18 vehicles with 1 race per hour for 3 hours each weekend day.

As discussed above, the proposed Project includes project design features that reduce the amount of vehicle trips and the air emissions generated by those mobile sources to the maximum extent feasible by allowing camping on the site to further reduce the amount of vehicle trips and vehicle miles traveled by patrons, spectators, participants, and workers attending the motorsports events.

Impacts on local air quality related to dust would be mitigated to a less than significant level. Please refer to the Air Quality Technical Memorandum (**Appendix 2.2**) of the Final EIR for additional clarification on the methodology used to calculate potential dust impacts.

Section 4.10 of the Draft EIR evaluates noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events.

As shown in the Draft EIR **Table 4.10-9, Noise Level Contour Map—Drag Strip Racing and OHV Trail Ride Area**, maximum noise level increases along roadways adjacent to residential, commercial, and industrial uses by proposed Project traffic would range from a low of 0.0 dB(A) (several locations throughout the vicinity of the proposed Project area) to a high of 13.7 dB(A) (along V Street, north of Central Avenue). The roadway noise levels along V Street, north of Central Avenue, would be 58.7 dB(A) CNEL and would fall below the 65 dB(A) exterior noise level standard identified for community facilities and below the 75 dB(A) exterior noise level standard identified for manufacturing uses in the General Plan Noise Element. Therefore, the proposed Project would not add traffic to these roadways such that noise levels would exceed the City's exterior standard, and impacts would be less than significant.

The post-Project noise levels would be approximately 62.7 dB(A) CNEL along Central Avenue to the east and west of Barton Avenue. The maximum noise level increase along roadways adjacent to residential uses by proposed Project traffic would be 2.0 dB(A) along Central Avenue, both east and west of Barton Avenue. Noise level increases along the roadway segment would be less than 3 dB(A) CNEL and, as such, would not exceed the identified threshold for residential uses. Impacts would be less than significant.

Noise modeling was conducted to find the predicted event-related sound levels at several representative locations throughout the adjacent area for three event scenarios: (1) Drag Strip Racing; (2) Drag Strip Racing and OHV Trail Ride Area; (3) and OHV Major Events.

Table 4.10-10, Drag Strip Racing (Spring) of the Draft EIR provides the predicted Leq levels, which would be produced at nearby sensitive receptors by drag strip racing. As shown**,** drag strip racing would result in an increase in ambient noise measurements of up to 2.0 dB(A). The results of the predictive modeling

process are shown graphically in **Figure 4.10-8, Typical Maximum Noise Levels for Construction Phases** of the Draft EIR.

Overall, the noise generated by the proposed drag strip would be similar to noise generate under existing conditions, with exterior noise levels ranging from a low of 50.0 dB(A) to a high of 72.9 dB(A). Off-site noise level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant.

The OHV trail ride area would feature dirt bike and ATV trail riding involving fewer jumps and incorporating more rocks, puddles, mud, and sharp corners. **Table 4.10-11, Drag Strip Racing and OHV Trail Ride Area** in the Draft EIR provides the predicted Leq levels at nearby sensitive receptors that would be produced by drag strip racing and OHV trail riding occurring concurrently.

The results of the predictive modeling process are shown graphically in **Figure 4.10-9** of the Draft EIR. As shown**,** the drag strip racing and OHV trail ride area would result in an increase in ambient noise measurements up to 2.1 dB(A). Overall, the noise generated by the proposed Drag Strip and OHV Trail Ride Area would be similar that under existing conditions, with exterior noise levels ranging from 50.0 dB(A) to 72.9 dB(A). In addition, off-site noise level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant.

Table 4.10-12, OHV Riding (Spring) of the Draft EIR provides the predicted Leq levels at nearby sensitive receptors that would be produced by OHV riding. The results of the predictive modeling process are shown graphically in the **Figure 4.10-10** of the Draft EIR. As shown**,** OHV riding would result in an increase in ambient noise measurements up to 1.8 dB(A). Overall, the noise generated by the proposed OHV riding would be similar to existing conditions, with exterior noise levels ranging from 50.1 dB(A) to 72.9 dB(A). Off-site noise level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant

Please refer to Topical Response 7, Noise, for a discussion regarding noise methodology and general plan consistency. As discussed, the highest increases occurred during the Drag Strip/OHV Trail Ride Area scenario, with exterior noise levels increased by 2.1 dB(A) at nearby sensitive receptors when compared to the existing noise levels. It was determined that based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact.

Response 13-2

Please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB).

As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval; if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 13-3

Section 5, Alternatives, of the Draft EIR provides a discussion of other locations that were considered but not evaluated.

A number of alternative sites were initially considered but rejected as infeasible. Those potential sites, as shown in **Figure 5.0-1, Off-Site Alternative Locations** of the Draft EIR, were reviewed for their ability to meet the basic site criteria for the proposed Project objectives as listed in Alternatives Evaluated in Detail below. To accommodate a proposed motorsports park, a site needs to be approximately 38 acres in size to provide enough land for the facilities and parking. To accommodate the traffic generated by the proposed Project, a suitable site needs to have efficient access to local roadways that connect to regional roadways, such as State Route (SR) 1 and/or SR 246. Additionally, the proposed Project site aims to remediate and restore land along the Santa Ynez River; improve existing skydiving landing areas; provide for implementation of mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project, if still required; to improve runway safety zones; and to reduce illegal riding in the Santa Ynez River bed and street racing.

Each of the alternatives sites and the reason why they were not evaluated further was provided.

Please refer to Topical Response 5, Land Use Compatibility, regarding land use compatibility. As discussed, the proposed Project is consistent with the appropriate land use designation and meets the City's zoning requirements. According to the City's General Plan Land Use designation the proposed Project is located within Community Facilities and zoned for Public Facility uses. Within the City, Public Facilities are currently located adjacent to residential and commercial uses; therefore, the proposed Project is consistent with existing conditions.

Response 13-4

Section 15131, Economic and Social Effects, of the State CEQA Guidelines, states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR because there is no relation to potential physical changes to the environment resulting from any economic causes.

From: David Hughes <skydivesb@gmail.com>
Subject: Fwd: Skydive Santa Barbara LLC
Date: July 5, 2016 at 9:26:31 PM PDT
To: lbreeese@ci.lompoc.ca.us
Cc: Richard Fernbaugh <r_fernbaugh@ci.lompoc.ca.us>

Dear Lucille
I sent this E-mail to the FAA and for some reason it didn't make it to you, so hopefully you will get it this time.

I'm writing you this E-mail because I am very concerned about Lompoc City Council allowing a Motor Sports Park to take most of my Skydiving landing Area (Drop Zone) at Lompoc Airport (KLPC).

As of now, I have a landing area that is 760 Ft long, and between 150-400ft wide.

Here are the U. S. P. A. (United States Parachute Association) recommendations for Drop Zone Requirements:

Areas used for skydiving should be unobstructed, with the following MINIMUM RADIAL Distances to the nearest hazard.

14-1

a. solo students and A-license holders: 330 feet

b. B-and C-license holders and all tandem skydives: 165 feet

c. D-license holders: 40 feet

As you can see we do not have sufficient area for solo students and A-license holders and just barely room for B- and C-license holders, but with intense training we have been able to work with this area since we started dropping jumpers here at Lompoc Airport in 1997.

The Motor Sports Park group has entered plans to the City of Lompoc taking our Drop Zone and reducing it down to 430 feet long and between 120-230 feet wide. To make it even worse, my whole Drop Zone would have a 4-6ft fence all around it, and the South side would be an access road for vehicles to the new Motor Park.

With the reduction of my landing area and with the added hazards, it would be impossible for me to use this

1

area and I would have to close up my Skydiving operation at Lompoc Airport. 14-1

Skydive Santa Barbara LLC has been in business for 19 years. We operate 7 days a week. (The only day we are closed is Christmas Day.) We completed 20,846 drops in the last 12 months, and flew 1,941 loads. We are one of the leading Tandem operations in Southern California - completing 8,300 tandem jumps in 2015. We operate a Texas Turbine Conversion Cessna Caravan (Supervan 900) which I'm proud to say is the fastest climbing skydiving plane in the United States (single engine plane). 14-2

At the moment the Motor Sports Park development is in the EIR stage.

Thank you for reading my E-mail. Any help would be appreciated.

David Hughes
Member/Manager Skydive Santa Barbara LLC
Cell 805-717-2461

2

Breese, Lucille

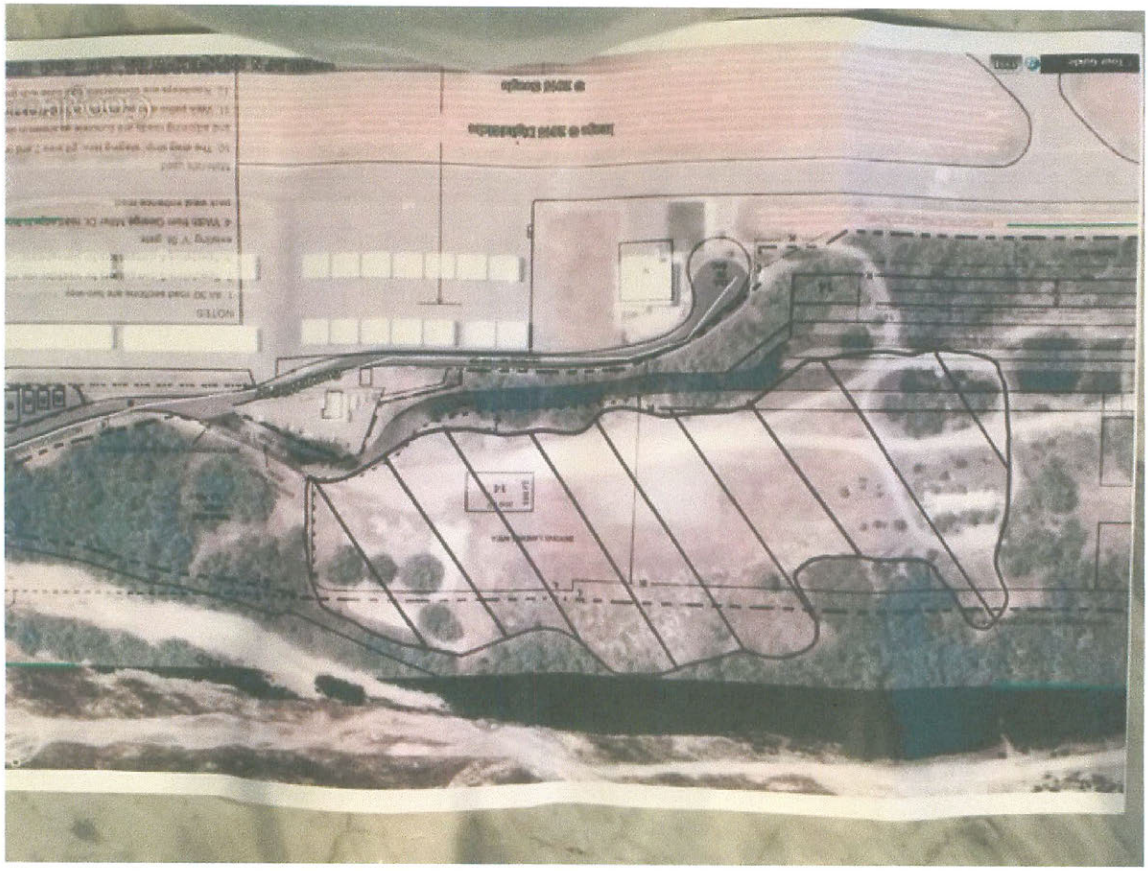
From: David Hughes [skydivesb@gmail.com]
Sent: Tuesday, July 05, 2016 9:53 PM
To: Breese, Lucille
Cc: Fernbaugh, Richard
Subject: Fwd: Skydive Santa Barbara Drop Zone conflict with Motor Sports Park.

Concerning the Motor Sports Park.

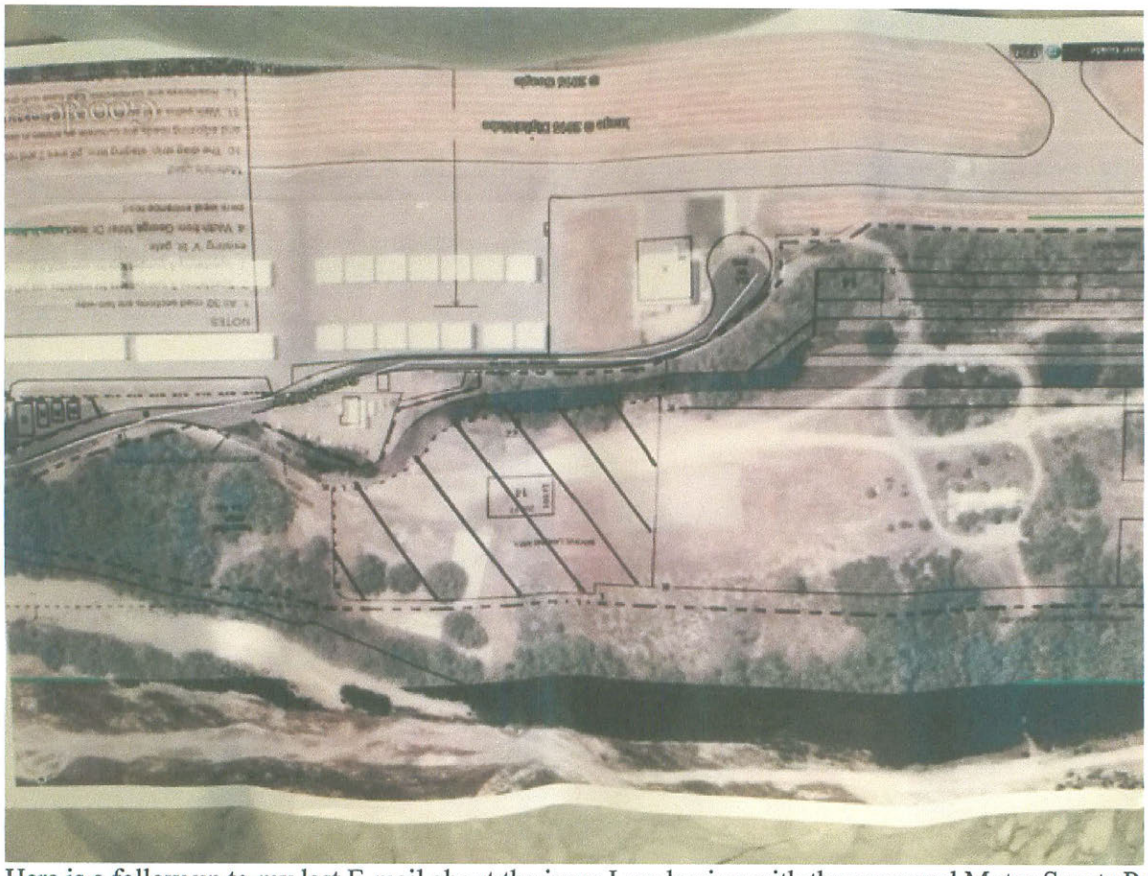
Begin forwarded message:

From: David Hughes <skydivesb@gmail.com>
Subject: Skydive Santa Barbara Drop Zone conflict with Motor Sports Park.
Date: July 5, 2016 at 9:20:59 PM PDT
To: tim.hester@faa.gov
Cc: Richard Fernbaugh <r_fernbaugh@ci.lompoc.ca.us>, lbreese@ci.lompoc.ca.us

1



2



Here is a follow up to my last E-mail about the issue I am having with the proposed Motor Sports Park at Lompoc Airport.
On the left is my existing Drop Zone for the Skydivers which we have been using for 19 years, and on the right is the Drop Zone proposed by the Motor Sports Park. 14-3

David Hughes
Member/Manager
Skydive Santa Barbara LLC
(Cell) 805-717-2461

Letter No. 14: David Hughes, July 5, 2016

Response 14-1

The Draft EIR provides a discussion of the potential impacts to the skydive area (see Draft EIR Section 4.9, Land Use). As stated in the Draft EIR, the proposed Project would relocate the existing skydive drop zone (DZ) to an area to the east and adjacent to Runway 7/25 (see Draft EIR **Figure 4.9-1, Additional Existing and Proposed Land Uses**). As proposed, the new DZ area would be 275 by 500 feet. A new skydive landing area approximately 250 by 600 feet with a trapezoidal northwest corner would be located at the west end of the Runway to meet requirements for sanctioned, United Parachute Association Class B and C license holders. The existing 100-by-200-foot pea gravel landing target would also be relocated and would serve as an accuracy point for skydivers. Reconfiguring the area currently available to skydivers from 250 feet wide and 500 feet long to the irregularly shaped 275 feet by 500 feet wide area would not result in significant impacts because the proposed Project is not proposing a reduction in size.

In addition, the proposed western DZ (250 by 600 feet) would not result in a reduction in area for skydive landers. However, the relocation of the DZ increases the risk for "cutaways" or faulty chutes that have been detached to drift across active airport operation areas, putting both the skydivers and aircraft at risk. Transient pilots, those who are not based or familiar with the airport, are of special concern to these risks because they may not be as familiar with the airport's operations, including skydiving, or its adjacent facilities.

The Draft EIR further notes the FAA Form 5010 Airport Master Record currently in place for Lompoc Airport states SDSB operates only on weekends; however, SDSB operates seven days a week. Transient pilots often rely on that kind of information. Therefore, it is recommended that the City of Lompoc update that form to reflect the correct daily skydiving activities.

Relocating the DZ to the western end of Runway 7/25 would result in potentially significant impacts because of potential risks for skydivers to miss the landing area and interfere with airport operations. That is especially true if skydiving activities occur outside the days noted on FAA Form 5010 Airport Master Record currently in place for LPC. Those impacts would be potentially significant.

In addition, please refer to Topical Response 8 regarding Skydive Santa Barbara (SDSB). As discussed, the relocation of the skydiving DZ is subject to FAA review and approval. If approved, then the relocated DZ would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 14-2

The comment providing existing skydive operation information is noted and does not provide any comment on the environmental analysis.

Response 14-3

The comment providing drop zone figures is noted, and will be forwarded to the decision makers for review and consideration.

From: Michael Emerson [mailto:michaelwemerson@hotmail.com]
Sent: Tuesday, July 12, 2016 2:08 PM
To: Breese, Lucille
Subject: Motor Sports EIR

I live in La Purisma Highlands at 2320 Carrizo and would like to complain that the EIR report generated for the city regarding the motor sports park is intentionally deceiving our city leaders. 15-1

The reports claim that a drag strip/motocross park less then 1 mile from my front door will not impact my property. The report claims that my house has a constant ambient noise of 70dbs... The equivalant of a fright train constantly driving by... The report claims that because I live by train track and a 24/7 train noise, that a drag strip will not impact my life. 15-2

My problem is clear, but I will spell it out... The report is crazy for believing that my ambiant noice is any different then any other normal neighborhood. There is no train track. Yes we have planes that fly over head, but we don't live near LAX.

Please count me as a resident that does not want this project to move forward. 15-3

Sent from Outlook Mobile

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JUL 18 2016

Planning Division

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Letter No. 15: Michael Emerson, July 18, 2016

Response 15-1

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 15-2

Please refer to Response 13-1.

In addition, please refer to Topical Response 7, Noise for a full discussion regarding noise methodology.

Response 15-3

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

From: Troy Nichols [mailto:tnicho03@gmail.com]
Sent: Sunday, July 17, 2016 3:45 PM
To: Breese, Lucille
Subject: Motorsports Park

An interesting read.
As a non-degreed engineer with some background in/understanding of communications and signal/power levels, my conclusion is that processes used to develop the DEIR were meant to show the least possible impact.
To say there was manipulation involved is accusatory, so I'll refrain from such strong language. It IS completely fair to say the study was done with an intent to mislead by presenting technical data gathered with significant bias. The goal was to reach a desired data model and outcome.
Hmmm...then again, maybe 'manipulation' isn't too far off the mark. 16-1

Yes, I live close enough (West Barton/Glen Ellen) to be significantly impacted by this ear-sore. It seems as though the entities behind this park are trying to hide in plain sight, using (abusing) the rules/regs associated with the airport as cover. They know the truth about what they're aiming for: this park, in full operation will produce sounds levels much higher than what is shown in their study. The concentration of noise sources that will come together in the proposed motorsports park will result in offensive noise to anyone within ~1/4 to 1/2 mile. If you're any closer, tough luck. (and bring earplugs) 16-2
There are too many other gaping holes in this report.
- the safety factors (with the airport and aircraft) 16-3
- toxic product run-off (it WILL be there) 16-4
- re-forestation (and sustaining) costs 16-5

Is it possible we could be taxed to pay for the negative residuals of this project? 16-6
Nothing good will come of this.
For those who want to have a place to raise a little hell in their OHVs: Lompoc isn't even close to hell's address. Move along and take this semi-controlled mayhem elsewhere. 16-7

The City Council will hopefully bring this to a 'peaceful' conclusion. (pun intended)

T. Nichols

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JUL 19 2016

Planning Division

1

Letter No. 16: Troy Nichols, July 19, 2016

Response 16-1

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

The commenter is also directed to Topical Response 7, Noise for a full discussion regarding the methodology used to assess potential noise impacts.

Response 16-2

As noted in Response 13-1, Section 4.10 of the Draft EIR evaluates noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events.

The commenter is also directed to Topical Response 7, Noise for a full discussion regarding noise impacts. As discussed, the highest increases occurred during the Drag Strip Racing and OHV Trail ride events, with exterior noise levels increased by 2.2 dB(A) at nearby sensitive receptors when compared to the existing noise levels. It was determined that based on the increases being less than 3 dB(A), noise during the operational phase would result in a less than significant impact.

Response 16-3

The Draft EIR address safety concerns and hazards in Section 4.7, Hazards.

The Draft EIR determined the proposed Project would have a negligible effect on airport accident risks. That is because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the Lompoc Airport. The probability of accident/safety hazard risks would be similar before and after implementation of the proposed Project. Impacts related to the probability of accident/safety hazard risks would be less than significant.

In addition, the commenter is directed to Topical Response 1, Airport Safety regarding Airport safety. Also, the proposed Project would be subject to FAA review and approval, thereby minimizing any potential for risks or accidents associated with the airport.

Response 16-4

Section 4.8, Hydrology and Water Quality, of the Draft EIR addresses concerns related to water quality and storm water runoff.

The Draft EIR notes the potential exists for increases in soil erosion, siltation, and construction-related pollutants could degrade downstream surface water or groundwater. However, the construction of the

proposed Project would comply with the regulatory requirements to minimize, to the maximum extent practicable, the degradation of water quality.

The proposed Project would be required to comply with NPDES requirements. Construction activities would be subject to the NPDES general construction activity permit and would be required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters and consider the use of post-construction permanent Best Management Practices (BMPs).

The proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The City Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application.

Compliance with those requirements would reduce potential construction and post-construction water quality impacts to less than significant.

Further, as discussed in Section 4.8 of the Draft EIR, the proposed Project would not impede on percolation of groundwater and would provide for surface water to be collected at two proposed infiltration basins. The infiltration basins would not allow any runoff to be drained into the Santa Ynez River.

The commenter is directed to Topical Response 3, Hydrology regarding hydrology for additional information.

Response 16-5

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 16-6

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, Off-Highway Motor Vehicle Recreation (OHMVR) grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Response 16-7

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

COPY

Lucille Breese, AICP
City Of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Ms. Breese:

In reviewing the Draft EIR for the Motorsports Park, I find several areas to be inaccurate and incomplete. I believe this document should not be adopted by the city without major revision. Several areas fail to address my concerns. The following subjects have not been addressed or are not able to be mitigated resulting in an incomplete assessment of the proposed project.

1) The Noise Study says there is no noise issue to mitigate. This is inaccurate as their own data shows the project fails to satisfy the 2030 General Plan Noise Policy because it fails the following: 17-1
   a. Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards."
   b. Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."
   c. Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."
2) The city will need to address issues raised by the Santa Barbara County Association of Governments (SBCAG) and the Federal Aviation Administration (FAA), as group recreation areas are "incompatible uses" for areas next to active runways after adopting the Draft ALUP. 17-2
3) And finally, per the DEIR, "the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason" (pg 4.2-31 of the DEIR.) This means operating the park will make air quality demonstrably worse and reduce the quality of life for all of the community. 17-3

Sincerely, GREGG SMITH
7/18/2016

RECEIVED
JUL 19 2016
Planning Division

Letter No. 17: Gregg Smith, July 19, 2016

Response 17-1

Section 4.10 of the Draft EIR provides an evaluation of the potential noise impacts from the proposed Project. Pages 4.10-22–24 provide the City's requirements and thresholds for noise.

The Draft EIR (see pages 4.10-30–41) provides evaluation of potential for noise impacts during both the construction and operational phases of the proposed Project. As discussed in Response 13-1, the Draft EIR evaluates noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events.

The Draft EIR states (see page 4.10-35) a significant impact would occur if proposed Project operations cause the exterior noise levels at a lot property line for a noise sensitive use to exceed 60 dB(A) where ambient noise levels are below 60 dB(A) CNEL; or proposed Project operations cause the ambient noise level measured at the property line of the affected noise sensitive uses to increase by 3 dB(A) where the existing exterior noise level already exceeds the City's exterior noise standard.

As presented in the Draft EIR and in **Table 4.10-10,** the predicted Leq levels, which would be produced at nearby sensitive receptors by drag strip racing, would result in an increase in ambient noise measurements of up to 2.2 dB(A). Overall, the noise generated by the proposed Drag Strip would be similar to existing conditions, with exterior noise levels ranging from a low of 50.0 dB(A) to a high of 72.9 dB(A). Off-site noise level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant. As such no mitigation required.

The Draft EIR presents results of the predictive modeling process for the combination of drag strip racing and OHV trail ride area and notes that they would result in an increase in ambient noise measurements up to 2.2 dB(A). Overall, the noise generated by the proposed Drag Strip and OHV Trail Ride Area would be similar to existing conditions, with exterior noise levels ranging from 50.0 dB(A) to 72.9 dB(A). In addition, off-site noise level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant. As such no mitigation required.

The Draft EIR **Table 4.10-12,** provides the predicted Leq levels at nearby sensitive receptors that would be produced by OHV riding. As shown**,** OHV riding would result in an increase of up to 2.0 dB(A) in ambient noise measurements. Overall, the noise generated by the proposed OHV riding would be similar that generated under existing conditions, with exterior noise levels ranging from 50.1 to 72.9 dB(A). Off-site

noise-level increases at nearby sensitive receptors would be less than 3 dB(A) when above 60 dB(A) exterior standards. Therefore, impacts would be less than significant. As such, no mitigation required.

Given the potential impacts are within the established threshold identified by the City, they are consistent with the General Plan Policies 1.1, 1.2, 2.1, 2.3, and 2.4 of the Noise Element.

Response 17-2

Section 4.9, Land Use, of the Draft EIR discusses land use issues related to the airport, including the Airport Land Use Plan (ALUP). As noted in the Draft EIR, the County of Santa Barbara ALUP was prepared by the Airport Land Use Commission (ALUC), under the authority of the Santa Barbara County Association of Governments (SBCAG). The ALUP was adopted in 1993 and is currently in the process of being updated. The purpose of the ALUP is to promote compatibility between Santa Barbara County airports and their surrounding land uses and to identify flight patterns and safety zones.

The Draft EIR (see pages 4.9-31–32) discusses the fact the ALUC is in the process of updating the ALUP. As noted in the Draft EIR, the proposed Project would be incompatible with the Draft Airport Land Use Compatibility Plan (ALUCP). However, the Draft ALUCP has not yet been adopted; therefore, the proposed Project is not required to comply with the proposed safety zone requirements.

Finally, the Draft EIR (see page 4.9-14) notes the ALUC provided advisory comments for the proposed Project and scope of the environmental review in relation to the adopted 1993 ALUP. As noted, the draft ALUCP update is currently in process. SBCAG anticipates the draft ALUCP will be adopted in late 2016. The draft ALUCP considers the State Aeronautics Act, each airport's Airport Layout Plan and Master Plan (where applicable) and guidelines within the California Airport Land Use Planning Handbook, published by the Caltrans Division of Aeronautics. Within 180 days after adoption of a ALUCP, State law requires each local agency affected by the plan must amend its General Plan as may be necessary to be consistent with the ALUCP or overrule the ALUCP by a two-thirds vote of its governing body.

Response 17-3

Section 4.2 of the Draft EIR evaluated impacts to air quality. As noted, most potential impacts would be mitigated to the furthest extent feasible. The proposed Project would be consistent with the 2013 CAP and would result in less than significant construction related air quality impacts. Stationary operational emissions generated by the proposed Project would fall below SBCAPCD thresholds and, as such, would result in less than significant impacts.

However, impacts from vehicular travel to and from the proposed Project site would still remain significant and unavoidable. While the proposed Project would work to reduce emissions from vehicular

traffic and reduce vehicle miles traveled, emissions generated for a single day would remain above daily mass significance thresholds for NOx and VOC adopted by SBCAPCD. Regardless, impacts would be significant and unavoidable under those thresholds developed by SBCAPCD.

The Draft EIR provides that information to decision makers of the impacts of the proposed Project on the environment. The City Council, as the lead agency, has the ability to override significant and unavoidable impacts based on the beneficial purpose of the proposed Project. As noted in the CEQA Guidelines, Section 15093:

> *(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*
>
> *(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
>
> *(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

If the Council certifies the final EIR and decides to approve the proposed Project, then prior to that approval the City Council would also need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits of the proposed Project outweigh the significant unmitigated impacts.

Lucille Breese
City of Lompoc

Re: EIR motorsports park

Dear Ms. Breese,

The Noise study misleads the readers. They say there is no noise issue to mitigate is false and misleading. In other words, this report is design to deceive the truth and the noise issue. Allan Hancock had a similar noise report, and after they open their open air gun range all hell broke loose because the noise was extremely loud. I had to close all my windows and turn the TV sound to a high volume and I could not block out the noise. When I review the Lompoc City Noise ordinance, it is in direct conflict with this motor park. Lawyers love suing cities like Lompoc who do not follow their ordinances, and when they fail to apply them fairly to all projects. 18-1

If the city approves this project, I will see you in court! 18-2

Sincerely,

Dale A. Lardy
2836 Lewis Drive
Lompoc, CA 93436
7-21-16

RECEIVED

JUL 25 2016

Planning Division

Letter No. 18: Dale A. Lardy, July 25, 2016

Response 18-1

Please refer to Response 17-1. In addition, please refer to Topical Response 7, Noise for a discussion regarding consistency with the applicable policies mentioned in the City's General Plan Noise Element.

Response 18-2

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

July 21, 2016

City of Lompoc
100 Civic Center Drive
Lompoc, CA 93436
Lucille T. Breese, AICP Planning Manager

Daniel J. Turocy
Past Grand Knight
1321 Sunnybrook Ct.
Lompoc, CA 93436-8114

Dear Lucille Breeze, Project Manager

I can't believe that I have to write another letter to express my total opposition to having a raceway built **inside the city limits of Lompoc**. The Idea of building a raceway in the center of Lompoc's residential community is ludicrous and outrageous. Because of the noise pollution and human factor, raceways belong well beyond the city limits of any city. This raceway proposal will truly intrude on the peace and quiet that our community deserves. 19-1 19-2

By the fact that realtors will require disclosures to any potential property buyer of various problems such as extremely loud noise, air pollution, traffic etc., of homes in the general area of such raceway points to how detrimental this speedway can be for potential new buyers and for our own current residents. Due to the proximity of homes, of which there are over 2,500 residences affected in the immediate area, housing values will most likely decline. 19-3

At least 7,000 residents within a 1 ½ mile radius of this project will be negatively impacted by the creation of this Motorsport complex. It is obvious that this effort between the City of Lompoc and the LVPRPF has not studied the real concerns for the citizens of Lompoc in a densely populated area of our community. I will strongly consider initiating a class action lawsuit with my fellow citizens against the City of Lompoc for allowing such an unfair, unjust and undeserved decision if this EIR is ruled in favor of building this Motorsport complex. 19-4 19-5

This project has been shot down once by the city council. It is hard to believe that this issue has been reopened – nothing has changed!! This Motorsport complex is bad news to the citizens of Lompoc and does not belong in our city.

Sincerely,

Daniel J. Turocy

1321 Sunnybrook Ct.

RECEIVED

JUL 22 2016

Planning Division

Letter No. 19: Daniel J. Turocy, July 22, 2016

Response 19-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 19-2

Section 4.10 of the Draft EIR evaluates noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events. Please see Response 13-1. In addition, please refer to Topical Response 7, Noise for a discussion regarding noise methodology.

Response 19-3

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 19-4

The proposed Project has been subject to substantial review and outreach. As noted in Section 1.0, Introduction (see pages 1.0-2–3) of the Draft EIR, as part of the process to determine the scope of topics and concerns to be discussed the City circulated, as required by CEQA, a Notice of Preparation (NOP) between December 1, 2015, and December 30, 2015, for the required 30-day review period. The NOP comment review period was extended through January 11, 2016, to provide additional time for public input. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that would be discussed in this EIR.

After the NOP period and as part of the required CEQA process (Section 15087 of the State CEQA Guidelines), the Draft EIR was released by the City for a public review period. A Notice of Availability (NOA) of this Draft EIR for review was provided with copies of the Draft EIR to the State Clearinghouse and regional and local public agencies. In addition, the NOA and Draft EIR were made available on the City of Lompoc's website at http://www.cityoflompoc.com/comdev/Environmental-Open.htm. The EIR was circulated for a 52-day public review and comment period from June 24, 2016, ending on August 15, 2016.

Topics evaluated in this EIR have been identified based on the responses to the NOP and the review of the proposed Project by City staff. The City determined through that initial review process the impacts related to the following environmental topics are potentially significant and require an assessment in this EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Traffic and Transportation
- Utilities and Service Systems

The Draft EIR does not propose or favor any action on the proposed Project; it's purpose is to inform decision makers of the potential impacts of the proposed Project if the Council were to decide to approve the application. As noted in the CEQA Guidelines, Section 15092, the City Council must abide by the following before taking any action to approve a project that is analyzed in and EIR:

(a) After considering the final EIR and in conjunction with making findings under Section 15091, the Council may decide whether or how to approve or carry out the project.

(b) The Council shall not decide to approve or carry out a project unless either:

(1) The project, as approved, will not have a significant effect on the environment, or

(2) The Council has:

(A) Eliminated or substantially lessened all significant effects on the environment where feasible as shown in findings under Section 15091, and

(B) Determined any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.

Response 19-5

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Rhys M. Evans
2058 Green Ridge Circle
Lompoc, CA 93436

24 July 2016

RECEIVED

JUL 25 2016

Planning Division

Lucille Breese
City of Lompoc
100 Civic Center Plaza
Lompoc, California 93436

Regarding: Environmental Impact Report for Proposed Lompoc Motorsports Park

Ms. Breese,

As a resident, homeowner and voter in the City of Lompoc, I am writing to express my absolute opposition to the proposed "Lompoc Motorsports Park" adjacent to the Santa Ynez River in north Lompoc. The Draft Environmental Impact Report is woefully inadequate, poorly constructed and it will most assuredly result in expensive and lengthy legal challenges. With hundreds of comments in opposition to the proposed project already received and in the public record, I find it incredulous that the city is continuing to plan for this project, at very significant public expense, at the specified location. 20-1

I will divide my further comments into three major subject areas: General comments, Biological Resources and Noise. Although I also believe the EIR for the project poorly discusses Toxics/Hazards, Utilities, Hydrology and other issues, it is simply impossible, as an individual, to review more than 1,500 pages of documents and submit coherent commentary; therefore I will at least at this time leave comments on those subject areas to others. 20-2

General comments:

Although it is commendable to provide documents to the public via the city's website, it is inappropriate for them to be available only in files in excess of 100 megabytes. The appendices, especially, should have been provided individually, not as a single document exceeding 1,100 pages in length. The appendices also did not include a usable table of contents. For example, the "Habitat and Natural Resources Assessment" starts on page 695 of 1,141, which is simply not reasonable. Furthermore, the appendices were provided in a version of software that is not readily searchable. I believe these actions are not within the intent of the California Environmental Quality Act, which requires open and reasonable availability of documents to the public. 20-3

Several of the public documents, press interviews and informational releases regarding the project provided earlier implied that the facilities, especially the "drag strip" component, would only be used for a small number of events annually. However, the EIR clearly details a potential for hundreds of events annually, not to mention testing and practice actions. 20-4

The sections discussing surrounding properties and land use were written with inappropriate bias. While there is agriculture, the airport and industrial use as well as the animal care facility, the document should also mention and quantify the number of homes, apartments, hotel rooms, restaurants and other properties which are simply not compatible with land use that will provide nearly constant, excessive noise hundreds of days per year. I would strongly suggest that a detailed evaluation of how many homes are within 1 mile, 1.5, 2 and 2.5 miles (at a minimum) of the site be commissioned. This information was provided by a member of the public (apparently by a Mr. Turocy, in the appendices at page 376); it is hard to believe that the city did not consider this information to be important enough to either confirm or refute within the Draft EIR. 20-5

There is far too much use of conditional language, to include "to the maximum extent feasible," and "unless the lights are used." Additionally, far too common use, especially in the Biological Resources report and within the minimization measures, of "should" vs. "shall," "will" or "must;" ("surveys should be conducted by a qualified biologist..."). "Should" is simply not a strong enough word 20-6

Much more analysis and evidence must be provided to demonstrate that no water or stormwater run-off from the site will impact the Santa Ynez River. There also must be a much more detailed assessment of what measures will be taken to ensure that spilled automotive fluids are completely controlled and contained on site. Although this assessment must focus on the vehicles used within the various facilities on site, you must also include an analysis of the parking areas. Obviously, the site is proximal to the Santa Ynez River; while a high-flow event is unlikely in any given year, this EIR seems to negate any possibility of a flood at any time within the life of the proposed project. 20-7

Additionally, attempts to point lights downward so as not to impact off-site resources is simply "not enough." Lights in the area of the Santa Ynez River are highly likely to detrimentally alter the behavioral patterns of all wildlife nearby. 20-8

I am simply astounded that the plans call for the use of portable toilets for crowds potentially including 2,000 persons. 20-9

The location of the "Arroyo Willow Thicket" mitigation site must be clearly identified AND assessed for the same impacts to resources that are assessed for the project area. 20-10

Biological Resources:

The Biological Resources portion of the EIR (Appendix 4) is entirely insufficient. The report specifically states that it was "reconnaissance-level," which is certainly inadequate for inclusion at the EIR level. It clearly states that only one biologist and one botanist spent only one day on site in January, 2016. It further states that this visit was not in the optimal survey period for most species. I would argue that it was not within the optimal survey period for ANY species, and that numerous, additional surveys must be included prior to the finalization of the EIR. I would further argue that additional surveys must include nighttime assessments of the site to determine habitat use by bats, owls and other nocturnal species. 20-11

The Biological survey includes no discussion of resources present in areas adjacent to the proposed development. Because it is certain that noise and light impacts will extend beyond the site, and likely that stormwater, wastewater, hazardous materials, litter and overflow parking impacts will extend beyond the site, a buffer of at least 500 feet on all sides should be surveyed. 20-11

As discussed above, the lack of surveys within a buffer zone of the project site result in a remarkably inadequate "species list" considered within the Draft EIR. My comment from earlier in this year (included at page 331 of 1,141 – note again my disappointment at the ridiculous way in which appendices were provided) listed several species that were not considered. Especially disconcerting is the lack of inclusion of surveys for Yellow-billed cuckoo, Western burrowing owl, Least Bell's vireo, California tiger salamander, Townsend's big-eared bat and the Monarch butterfly (candidate species). 20-12

"Project site does not include aquatic habitat" is NOT sufficient to remove from consideration several dozen potential species (of plants and animals), as it is clear, once again, that noise, light and likely hazardous materials from the proposed action site will have a significant potential to harm aquatic species in the nearby Santa Ynez River habitat.

Comments on individual plant and wildlife species follow:

- El Segundo blue butterfly surveys were inadequate. It no surprise that the species was not observed in January; however not finding seacliff buckwheat within the proposed project area or a reasonable buffer area is surprising. Additionally, the statement "...species requires coastal dune habitat" is absolutely incorrect; the "ESBB" has been found in numerous locations east of Vandenberg Air Force Base including but not limited to the Burton Mesa Ecological Reserve, which is very close to the proposed project site. 20-13
- Vernal pool fairy shrimp. One brief site visit in the midst of a five-year drought is not adequate to remove this species from further consideration. 20-14
- Vandenberg monkeyflower. The habitat for this species is very similar to the conditions found adjacent to the Santa Ynez River and its tributaries both upstream and downstream of the project site; just because the plant was not observed in January (not surprising in the least) is not enough to eliminate this species from further consideration. There is designated Critical Habitat for Vandenberg monkeyflower within a very short distance of the proposed project area. 20-15
- Western snowy plover. While I freely agree that this species will not be adversely affected by the proposed project, the use of an outdated scientific name of this species (in addition to numerous typographical errors elsewhere within "Appendix B" of "Appendix 4.3") further demonstrates the inadequacy of the biological resources assessment in its entirety. 20-16

Additional general comments regarding the Biological Resources Report (appendix) and the Biological Resources section of the Draft EIR:

- Several statements regarding the United States Endangered Species Act make no mention of the role played by the National Marine Fisheries Service; 20-17
- The document poorly defines the Migratory Bird Treaty Act, which protects almost all bird species, not just the few taxa/families listed; 20-18

- "Threshold 4.3.1" does not include National Marine Fisheries Service; 20-19
- It is very unclear what additional analysis and permitting is planned for this project in regards to effects to both state and Federally listed Threatened and Endangered Species. Several actions, such as plans to capture and relocate a California red-legged frog from the project area clearly would require several permits. 20-20

Noise:

As a homeowner of a property less than one mile from the proposed project site, noise is a major concern; however I also note this submittal has already reached four pages in length. There are literally hundreds of comments expressing concern about noise levels, their impacts on quality of life and property values already in the public record for this project; therefore, I will just share a few additional thoughts at this time.

In general, I am not overly concerned with construction noise, but I am very concerned about operational noise, especially if events (to include practice and training) are conducted several times per week, 50 or more weeks of the year as is detailed in section 3.0 (for example, up to 50 "Wednesday evenings" per year or 55 "weekend days" per year). And as discussed earlier in this document, my concern about "unless lights are used" means that literally thousands of individual "noise events" could occur after sunset annually. 20-21

It is unclear, based upon my admittedly cursory review of more than 1,500 pages of documents, exactly how the noise assessments were completed. Were all analyses solely completed via computer modeling? Claims that sound will not travel significant distances from the project site are hard to believe. There is repeated discussion of "sound walls," but no clear indication that such structures are planned, and if so, where they would be located. The city should plan well-publicized demonstrations of potential noise effects to (perhaps) ameliorate the concerns of property owners (like me) in the immediate project area.

I will conclude this letter by again stating that I am entirely opposed to this proposed project, on numerous grounds, and I predict that the city and its officials will be held legally accountable if it is approved. 20-22

Thank you,

(signed) Rhys M. Evans
24 July, 2016

Letter No. 20: Rhys M. Evans, July 25, 2016

Response 20-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration. The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 20-2

This comment addressing the organization of the letter is noted.

Response 20-3

In accordance with Section 15087 of the State CEQA Guidelines, the City has made the Draft EIR available for review and comment. The Guidelines note to make copies of EIRs available to the public, Lead Agencies should furnish copies of draft EIRs to public library systems serving the area involved. Copies are also available in offices of the Lead Agency.

The City has posted the Draft EIR on its website and is available at the following link:

http://www.cityoflompoc.com/comdev/Environmental-Open.htm

In addition, the Draft EIR was available without downloading at City Hall, Economic Development—Planning Division, 100 Civic Center Plaza, Lompoc, CA 93438-8001.

Response 20-4

Section 15124 of the State CEQA Guidelines provides the requirements for a project description in an EIR. The Draft EIR adheres to and addresses the requirements noted in the Guidelines. The proposed Project description is based on information provided to the City by the applicant.

Information provided in the press or other media is not subject to any control by the City, and as such, may not represent the information accurately.

The proposed Project's operational characteristics are provided in Section 3.0, Project Description of the Draft EIR. The Draft EIR **Tables 3.0-1, OHV Area Events** and **3.0-2, Drag Strip Events** provide a detailed description on the type of event, the number of participants/spectators, type of vehicles, and other relevant proposed Project information.

Response 20-5

Section 4.9, Land Use, of the Draft EIR discusses the surrounding land uses. As such, the Draft EIR (see page 4.9-3) notes the nearest residential neighborhoods from the proposed Project site are La Purisima Highlands to the north, via SR-1, and River's Edge Estates via West Central Avenue, each approximately 0.65 miles away. Each neighborhood's Land Use Designation is Low Density Residential and the zoning designation is Single-Family Residential 7,000 square feet (sf).

In addition, the Draft EIR (see pages 4.9-3–9) provides information on land use designations and zoning in the proposed Project area. That information provides an understanding of the land uses, including residential uses, that may be of concern.

The analysis in the Draft EIR varies from topic to topic as to what distance from the proposed Project site was required to analyze impacts.

Response 20-6

The CEQA Guidelines (see Section 15021) establish a duty for public agencies to avoid or minimize environmental damage where *feasible* (emphasis added). The City, in deciding to review a project, has latitude in determining what is or is not feasible. However, such decisions must be supported by substantial evidence in the record.

The CEQA Guidelines (see Section 15002) further note one of the basic purposes of CEQA is to "Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible."

Section 15005 of the State CEQA Guidelines addresses the use of terminology. The section states:

> *The following words are used to indicate whether a particular subject in the Guidelines is mandatory, advisory, or permissive:*
>
> *(a) "Must" or "shall" identifies a mandatory element which all public agencies are required to follow.*
>
> *(b) "Should" identifies guidance provided by the Secretary for Resources based on policy considerations contained in CEQA, in the legislative history of the statute, or in federal court decisions which California courts can be expected to follow. Public agencies are advised to follow this guidance in the absence of compelling, countervailing considerations.*
>
> *(c) "May" identifies a permissive element which is left fully to the discretion of the public agencies involved.*

This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 20-7

As discussed in Section 4.8 Hydrology of the Draft EIR, the proposed Project would not allow stormwater flow from the project site to the Santa Ynez River, and would provide for surface water to be collected at two proposed infiltration basins. In addition, the proposed Project would be required to develop and implement during construction a Storm Water Pollution Prevention Plan (SWPPP) and employ Best Management Practices (BMPs) during construction and operation that would prevent soil erosion and discharge of pollutants. The proposed Project would be subject to reporting requirements by the agencies such as the Reginal Water Quality Control Board as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants.

Please refer to Response 16-4 and Topical Response 3, Hydrology regarding hydrology for additional information

Response 20-8

Please refer to Topical Response 4, Indirect Biological Resource Impacts regarding indirect biological resource impacts.

The Draft EIR notes the proposed Project operations, including lighting, would be sporadic and temporary, and limited to specific events. Section 4.1 (see page 4.1-15) of the Draft EIR notes outdoor lighting would comply with Title 24, Part 6 of the California Code of Regulations, Energy Efficiency Standards for Nonresidential Buildings. All lighting shall conform to the standards set forth in the Lompoc Municipal Code. Lighting to illuminate event areas will be used during events, but shall be shielded and focused downward reducing direct light in the direction of open space and the Santa Ynez River. In addition to lights directed downward and away from off-site habitats, adjacent vegetation including Arroyo Willow Thicket (AWT) would provide a buffer for any potential glare/lighting impacts to off-site habitats along the river.

As discussed in Section 4.3, Biological Resources, of the Draft EIR, indirect impacts from lighting could occur to various animal species on and near the site. The Draft EIR determined impacts from lighting would be less than significant.

Response 20-9

The comment notes portable toilets will be used but does make any comment regarding environmental concerns with the use of such. The comment is noted.

Response 20-10

Approximately 7.1 acres of land on the proposed Project site has been previously designated for the replanting of vegetation and mitigation project from the Lompoc Airport Runway Expansion. That mitigation effort was an obligation of the City pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife (CDFW).

The Draft EIR provides a discussion of the mitigation site required as part of the Runway Extension Project in both Section 4.3 Biological Resources, and Section 4.9, Land Use.

Please refer to Topical Response 6, Mitigation Area regarding the mitigation area. As discussed in Section 4.9 of the Draft EIR, implementation of the proposed Project would preclude the City from implementing the required 7.1 acre mitigation area, and would therefore, result in a significant impact.

If that replanting is still required, then the Draft EIR identifies the following mitigation measure to reduce those impacts:

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

Implementation of existing regulations, standards, and Mitigation Measure **MM 4.9-7** would reduce impacts associated with land use to a level of less than significant.

Response 20-11

The Draft EIR provides an evaluation of the methodologies used and potential impacts to biological resources in Section 4.3, Biological Resources. The information provided in the Draft EIR is based on previous regional and area biological studies including *Habitat and Natural Resources Assessment for the Lompoc Motorsports Park* prepared by BioResource Consultants Inc. (see Appendix 4.3), as well as information available from the CDFW, the California Natural Diversity Database (CNDDB), California Native Plant Society Electronic Inventory (CNPS), and US Fish & Wildlife Service (USFWS).

Prior to implementing biological surveys, standard database searches were conducted and reports from previous surveys of the area were reviewed to obtain pertinent information regarding potential special-status species, as well as sensitive natural communities that occur within the proposed Project vicinity.

Information about documented special-status plant and animal species that occur within the proposed Project vicinity was obtained from the CNDDB[1] the CNDDB search included the US Geological Survey (USGS) 7.5-minute quadrangles for Lompoc and surrounding area. Additional literature and databases referenced include:

- CNPS's Inventory of Rare and Endangered Plants of California containing species-specific habitat requirements for plant species;
- USFWS database of designated Critical Habitat
- *The Jepson Manual: Vascular plants of California,* 2nd ed.;
- A Manual of California Vegetation, 2nd ed.; and
- eBird website.

A reconnaissance-level survey of the proposed Project site and surroundings was conducted by biologists. The objective of the field survey was to determine the likelihood of occurrence of any special-status plant or wildlife species based on the presence/absence of suitable habitat and other natural history elements that might predict their occurrence. Based on a review of the species likely to occur on site, no surveys for bats, owls or other nocturnal species were determined to be needed. No surveys were required for aquatic species as the site does not contain and aquatic habitat. While critical habitat for the southern California steelhead (*Oncorhynchus mykiss irideus*) is within and contained by the Santa Ynez River adjacent to the proposed Project site, there is no Critical habitat for the southern California steelhead on that site. As such, the proposed Project will not have any direct impacts on the southern California steelhead.

Based on the proposed Project site conditions, it was determined by the biologist, those efforts were adequate to the complete the EIR.

Subsequent to the completion of the Draft EIR, protocol surveys for the southwestern willow flycatcher (*Empidonax trailii extimus*) were conducted on May 20, June 3, June 10, June 27, and July 5, 2016, as noted in Topical Response 2, Biological Resources. In addition, surveys for the black-flowered figwort (*Scrophularia atrata)* in accordance with protocol requirements on July 26, 2016. No flycatcher or figwort were observed during the focused surveys.

1 CNDDB (California Natural Diversity Database). 2016. Rarefind 5 [Internet]. California Department of Fish and Wildlife [v5]

As noted in Response 20-8, the Draft EIR considered impacts from lighting.

Response 20-12

See Response 20-11.

Response 20-13

As noted in Section 4.3, Biological Resources, of the Draft EIR, several special-status animal species are documented to occur in the vicinity of the proposed Project site. However, no special-status animal species were observed within the proposed Project site at the time of the survey. Four special-status wildlife species were determined to have a high likelihood and five special-status wildlife species were determined to have a medium likelihood of occurring within the proposed Project area.

While the El Segundo blue butterfly (*Euphilotes battoides allyni*) may exist in the area, the Draft EIR notes (see **Table 4.3-5**, page 4.3-17) the potential for El Segundo blue butterfly to be present on site is low. That species requires coastal dune habitat and hostplant *Eriogonum parvifolium,* and no suitable habitat is present.

Response 20-14

While the vernal pool fairy shrimp (*Branchinecta lynchi*) may exist in the area, the Draft EIR notes (see **Table 4.3-5**, page 4.3-17) the potential for vernal pool fairy shrimp to be present on site is low, and the proposed Project site does not include vernal pool habitat. No records show evidence of that shrimp within the vicinity of the proposed Project.

Response 20-15

While the Vandenberg monkeyflower (*Mimulus fremontii* var. *vandenbergensis*) may exist in the area, the Draft EIR notes (see **Table 4.3-5**, page 4.3-12) the potential for Vandenberg monkeyflower to be present on site is low, and habitat is not present. The species occurs within chaparral and lower montane coniferous forest. CNDDB occurrences are not within 5 miles.

Response 20-16

While the western snowy plover (*Charadrius alexandrinus nivosus*) may exist in the area, the Draft EIR notes (see Draft EIR **Table 4.3-5**, page 4.3-18) the potential for western snowy plover to be present on site is low, and no habitat is present. The species requires barren to sparsely vegetated sand beaches, dry salt flats in lagoons, dredge spoils deposited on beach, or dune habitat.

Response 20-17

Section 4.3, Biological Resources, of the Draft EIR notes the Santa Ynez River is a direct tributary to the Pacific Ocean and is considered non-wetland Waters of the United States; however, its streambed is within CDFW jurisdiction, and there is no federal jurisdiction. The river is considered critical habitat for the southern California steelhead (*Oncorhynchus mykiss irideus*); that habitat is located within and contained by the Santa Ynez River adjacent to the site (see Draft EIR page 4.3-35).

There is no critical habitat for the southern California steelhead on site. As such, the proposed Project will not have any direct impacts on the southern California steelhead. Additionally, the proposed Project is designed so surface water runoff on site will be directed and contained in two infiltration basins one to the north of the drag strip and one extending along the south end of the drag strip. As such, all surface water runoff would be captured in those two areas with no runoff drainage into the Santa Ynez River

As the proposed Project site does not impact directly or indirectly the river, there are no impacts to steelhead, there is no jurisdiction for the National Marine Fisheries Service.

Response 20-18

The Draft EIR (see page 4.3-27) identifies the Migratory Bird Treaty Act 16 (USC 703–712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended, Migratory Bird Act, and its purpose. Further, the Draft EIR provides reference to the full act in the footnote (no. 10) on the same page.

It is not the purpose of an EIR to repeat the contents of each regulation but rather provide a summary for the reader. Should the reader desire more information, they can access the regulation as described in the footnote.

Response 20-19

See Response 20-17.

Response 20-20

As noted in the Draft EIR (see page 4.3-31), any project that impacts CDFW jurisdictional areas, including fills, vegetation removal, or bridging, requires a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW.

The Draft EIR (see Table 4.3-1) notes approximately 14.5 acres of the proposed Project site are within CDFW's jurisdiction; therefore, the proposed Project is subject to an SAA.

In addition, the Draft EIR (see page 4.3-32) notes the California Fish and Game Code also prohibits the destruction of bird nests and eggs (Section 3503), and the "take" of birds of prey (Section 3503.5) and nongame birds (Section 3800). Disturbance that causes nest abandonment or loss of reproductive effort (killing or abandonment of eggs or young) is considered "take." Such take would also violate federal law protecting migratory birds.

Incidental take permits (i.e., Management Agreements) are required from the CDFW for projects that may result in the incidental take of species listed by the State of California as endangered, threatened, or candidate species.

Response 20-21

Please see Response 13-1 and Topical Response 7, Noise.

Response 20-22

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Ms Breese,

Reviewing the Draft EIR for the Motorsport Park, I find it incomplete and inaccurate on several points:

1) The Noise Study states that there are already pre-existing noise levels of 72.3Leq at several points along central avenue adjacent to the subdivisions (Glen Ellen, Meadows, Briar Creeks, etc...) of concern here. Therefore, the noise generated from the proposed motorsports park should not be of concern to the residents. According to the report, the measurement used is from the busiest and loudest intersection nearby (central and H street), and that value was measured for a period of 15 minutes between the time of 9:00am and 9:59am on only one day. This measurement is scientifically unsound: it was not done near any of the subdivisions mentioned above; it was only done once; and the events in question not be taking place in the morning according to what I understand. These values cannot be taken as realistic for the neighborhoods which are adjacent. As residents, we know that the noise level rises in the morning and abates during the day, rises again in the evening as people return from work, to decrease again afterwards. Noise levels of 72.3LEQ at off-peak hours would definitely impact the living conditions of the neighborhood during the late afternoon, evenings and week-ends and would be in violation of the city 2030 General Plan noise policy for residential areas. 21-1
2) It is my understanding that, motorsports vehicles can operate at noise levels up 95db. The report needs to clarify the details of the simulation used to represent the noise that the motorsport park will generate. what vehicle did they use?; where were the measurements taken?; and, was the vehicle the same as those that will actually participate in these events (i.e vehicles without exhaust pipes as mentioned in the report)? These questions are crucial to making a determination as to whether the proposed park will meet the noise level standards for the adjoining subdivisions. 22-2
3) The Noise Study in the EIR made no differentiation between ambient noise and 'noise annoyance' which refers the negative effects noise can have on a neighborhood. When a neighbor's car alarm goes off, even if the measurement is below 60db, we expect them to turn off the alarm. If a neighbor's dog barks continuously at 59db, we go to the neighbors and ask them to calm their pet down. These type of noises eventually become an annoyance. According to the report, drag racing "feature(s) two vehicles and would take place approximately 20 times per hour, with a race duration lasting approximately 5 to 12 seconds." For many of the residents with whom I have spoken, this would an example of 'noise annoyance'. What will be the noise annoyance to the residents of these subdivisions?

4) The report speaks to no significant economic growth for the city of Lompoc. However, nowhere in the report has the potential economic loss to people living in surrounding neighborhood also been estimated. Studies I have looked at show a decrease in housing values for people living close to parks such as these. Noise is a deterrent to people considering living around such parks. 21-3
5) Although the construction of infiltration ponds is advantageous for the construction of the park, nowhere does the report address the possible pollution of these ponds from the hundreds of vehicles that will be on site. These ponds could eventually become sources of pollution for the water table and I feel the issue should be studied. 21-4
6) The report states that 1250 participants or more could potentially attend these events. This will have an significant effect on local traffic and hotels. However, the report is not clear in what ways this will impact the city. The report mentions people staying in self-contained RVs on site but I find this unrealistic and would like some clarification on what the impact on traffic and hotels has been in other cities. Additionally, the noise generated by the resulting traffic could make it difficult for adjoining subdivisions to remain within the 60 dB limit as described in 2030 General Plan noise element, policy 1.1. 21-5 21-6

Sincerely,

Sandrine Zanella
1204 W Barton Ave
Lompoc, CA 93436

RECEIVED

JUL 25 2016

Planning Division

Letter No. 21: Sandrine Zanella, July 25, 2016

Response 21-1

Please refer to Topical Response 7, Noise.

Response 21-2

Please refer to the previous Response 13-1 regarding noise impacts and Topical Response 7, Noise.

Response 21-3

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 21-4

Please refer to Response 16-4 and Topical Response 3 regarding hydrology for additional information

As discussed in Section 4.8 Hydrology of the Draft EIR, the proposed Project would not allow stormwater flow from the proposed Project site to the Santa Ynez River, and would provide for surface water to be collected at two proposed infiltration basins. In addition, the proposed Project would be required to develop and implement during construction a Storm Water Pollution Prevention Plan (SWPPP) and employ Best Management Practices (BMPs) during construction and operation that would prevent soil erosion and discharge of pollutants. The proposed Project would be subject to reporting requirements by agencies such as the Reginal Water Quality Control Board as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants.

Response 21-5

As noted in the Draft EIR, Section 3.0, Project Description, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained. However, as a condition of approval, electricity would be provided to supply RVs onsite.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment. As such, the impact on nearby hotels is not an environmental impact; therefore, no further analysis or response is necessary.

Response 21-6

Please refer to Response 13-1 and Topical Response 7, Noise.

From: Andersen, Michael [mailto:MAndersen@Communitywestbank.com]
Sent: Monday, July 25, 2016 5:13 PM
To: Breese, Lucille
Cc: michael.andersen@rocketmail.com
Subject: Proposed Lompoc Motorsports Project

Good afternoon Lucille,

I am writing in regards to the proposed Lompoc Motorsports Project. My home address is (I am the homeowner for last 13 years):

2317 Carrizo St
Lompoc CA 93436
805-291-2426

I object strongly to the location of the proposed motorsports park. I've never heard of something like this being put in the middle of a town, this should be out in the countryside where the noise, exhaust, and extra traffic will not impact people's homes. Part of the charm of a small town like Lompoc is being quieter than living in a city, but that will change if this park goes into Lompoc. If the project goes forward you can expect plenty of complaints, lawsuits against the city, and people leaving town. My home backs up to H Street and I will be very negatively impacted by its location. I am definitely against the park, certainly in its proposed location. 22-1

Note: This e-mail contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the specific individual or entity named above. If you or your employer is not the intended recipient of this e-mail or employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any unauthorized dissemination or copying of this e-mail or the information contained in it is strictly prohibited. If you have received this transmission in error, please immediately notify the person named above at once by telephone and delete the message. Thank you.

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Letter No. 22: Michael Anderson, July 26, 2016

Response 22-1

The Draft EIR provides a discussion of the potential impacts to air quality (Section 4.2), noise (Section 4.10), and traffic (Section 4.13). Please refer to the Draft EIR for a discussion of those impacts.

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

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TO: CITY OF LOMPOC

FROM: ART AND SHERRY HIBBITS

DATE: 07/17/2016

SUBJECT: ENVIROMENTAL AND FISCAL IMPACTS OF THE APPROVAL, PERMITING, CONSTRUCTION, AND OPERATION OF THE LOMPOC MOTORSPORTS FACILITY, PROPOSED TO BE LOCATED NORTH AND CONTIGUOUS TO THE LOMPOC AIRPORT.

BACKGROUND: WITH THE DEIR NOW AVAILABLE FOR PUBLIC COMMENT, IT HAS BECOME ABUNDANTLY CLEAR THAT THE MANY FISCAL IMPACTS OF THE PROPOSAL ITSELF AND THE REQUIRED MITIGATION COSTS ARE NOT KNOWN, AND POTENTIALLY COULD BE SIGNIFICANT.

IT WAS STATED AT THE ONSET THAT ALL COSTS RELATED TO THIS PROPOSAL WOULD BE PAID BY THE MOTORSPORTS GROUP AND A STATE GRANT WITH NO COST TO THE CITY OF LOMPOC.

23-1

DISCUSSION: The following are some of the obvious costs likely to occur if this proposal goes forward:

(1) The costs of construction of a new well and its pump, electrical, and other hardware,
(2) RV Park: A required mitigation, which will require its own EIR and other costs such as permitting, utilities, construction, restrooms, etc.
(3) If portable restrooms are allowed, then there will be ongoing rental and servicing costs. If permanent, then permitting, construction, and hook-up to City sewer plant, will be additional costs,
(4) Fire hydrants and compliance with City Fire Codes will add costs,
(5) The costs of Traffic Mitigation Fees and construction of access from Central Av. via V Street to proposed site,
(6) The costs of ongoing Federal Environmental review including FAA and US Fish and Wildlife,

(7) A share of the costs of providing Parking for the non-State Grant Drag Strip,
(8) Costs related to lights, utilities, permitting and construction of a Pit Area,
(9) Costs of providing Police, Fire, and Emergency Medical during events,
(10) Various types of Insurance that are required for this type of operation, including but not limited to Liability, Personal Injury and Property Damage,
(11) Costs related to making this project ADA compliant,
(12) Construction of a Height Restricting Structure for West Vehicle Access, or as an alternative, a substantial lowering of the level of V Street, with resulting water retention and flooding issues,
(13) Cost to purchase and maintain 72 acres+ of Willow habitat.
(14) All costs related to construction and maintain water retentions basins, (note that the specification of one inch deep, must be an error) 23-1

The preceding is not in order of significance, and there are other DEIR requirements having additional costs. It should be noted that this project is to be built to "CITY CODE."

It should also be noted that a similar project was proposed in Santa Maria in 2010 and is under review. How this will affect the economic viability of the Lompoc Proposed Project, must be investigated.

To summarize: It should be emphasized that so far there has been no thorough economic analysis for this proposal: no Business Plan, no cash flow, no budget, no projection of required Capital Expenditures and ongoing operating costs...and most importantly, no apparent assignment of fiscal responsibility.

Further note that the Airport must be a profitable enterprise and NOT a Charitable operation.

Although the DEIR is not supposed to investigate fiscal issues, the information and mitigations contain therein result in major, major project costs and additional Environmental Impacts.

Speaking of Environmental Impacts, the Impacts of Noise probably cannot be mitigated using conventional sound walls, since many of the neighborhoods 23-2

affected are many hundreds of feet above the Noise source...and said Noise has been grossly underestimated in the DEIR.

This project should be denied (NO PROJECT ALTERNATIVE) on the basis of no feasible mitigation of the NOISE generated by the proposed activities. If approved, continuous monitoring of the NOISE LEVELS should be mandatory and unacceptable levels would result in corrective action by the operators and/or termination of the uses. 23-2

Please include this letter in the Comments to the DEIR

Respectfully submitted,

ART and SHERRY HIBBITS

1251 E. Hwy. 246

Lompoc, Ca. 93436

Letter No. 23: Art and Sherri Hibbits, July 26, 2016

Response 23-1

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Concerns about the cost of the facilities are beyond the scope of the Draft EIR.

Response 23-2

Please refer to Topical Response 7, Noise, and Response 13-1.

Lucille Breese, AICP
City of Lompoc
100Civic Center Plaza
Lompoc, CA 93436

Dear Ms. Breese,

In reviewing the Draft EIR for the motorsports park, I have found many areas of concern.

1) The noise study says there is no issue issue to mitigate. The data shows that the project fails to satisfy the 2030 General Plan Noise Policy:
   a) Page N-9 of the 2030 General plan noise element policy 1.1 states " the city shall require each land use to maintain noise levels at their property line in compliance with City Standards". We are talking about 60 Decibels in the subdivisions closest to the project As the data collected is not described in detail, it is hard to determine the EIR is accurate either on the high end or low end.
   b) Policy 2.4 states " The city shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The noise Ordinance establishes noise limits that cannot be exceeded at the property line." Again the value of 60 dB is of great concern since the details in the report do provide point of reference for discussion.
   c) Policy 2.3 states" the City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan." The motorsport Park being located right next to the airport is in obvious contraction with this policy.

24-1

2) Per the DEIR, the air quality during weekend motorsport events will be negatively affected resulting in lower air quality than is acceptable for all neighborhoods around "Central Avenue."

24-2

3) Per DEIR, traffic will increase on Central Avenue. This combined with increased pollution and increased noise will inevitably result in a loss of property value for all adjacent subdivisions. In fact, nowhere in the report is there mention of potential losses of property values in the adjacent subdivisions. In order to make a well informed decision, I believe the issue should be addressed formally.

24-3

Sincerely,

Lauren Ranard

Ms. Lauren Ranard
1400 Village Meadows Dr
Lompoc, CA 93436

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JUL 26 2016
Planning Division

Letter No. 24: Lauren Ranard, July 26, 2016

Response 24-1

Please refer to Response 17-1 and Topical Response 7, Noise.

Response 24-2

Please refer to Response 13-1.

Response 24-3

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Lucille Breese, AICP
City Of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Ms. Breese:

In reviewing the Draft EIR for the Motorsports Park, I find several areas to be inaccurate and incomplete. I believe this document should not be adopted by the city without major revision. Several areas fail to address my concerns. The following subjects have not been addressed or are not able to be mitigated resulting in an incomplete assessment of the proposed project. 25-1

1) The Noise Study says there is no noise issue to mitigate. This is inaccurate as their own data shows the project fails to satisfy the 2030 General Plan Noise Policy because it fails the following: 25-2
   a. Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards."
   b. Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."
   c. Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."
2) The city will need to address issues raised by the Santa Barbara County Association of Governments (SBCAG) and the Federal Aviation Administration (FAA), as group recreation areas are "incompatible uses" for areas next to active runways after adopting the Draft ALUP. 25-3
3) And finally, per the DEIR, "the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason" (pg 4.2-31 of the DEIR.) This means operating the park will make air quality demonstrably worse and reduce the quality of life for all of the community. 25-4

Sincerely,

Mark Gober

MARK GOBER
285 TAMARISK DR
LOMPOC, CA 93436

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Letter No. 25: Mark Grober, July 27, 2016

Response 25-1

The Draft EIR provides a discussion of the potential impacts that could result from the implementation of the proposed Project and any suggested mitigation to reduce those impacts. Please refer to the Draft EIR for a discussion of those impacts and mitigation measures.

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 25-2

Please refer to Response 17-1 and Topical Response 7, Noise.

Response 25-3

Please refer to Response 17-2.

Response 25-4

Please refer to Response 13-1 and Topical Response 7, Noise.

July 26, 2016

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc CA 93436

Dear Ms. Breese:

I am writing to express my opposition to the proposed Motorsports Park. 26-1

In addition to the depreciation of property values, the added air pollution, control and safety issues at our airport and traffic congestion (for starters) which are certain to be a result of such a project, I understand there was inadequate testing done for the EIR which was presented to the City. 26-2

The City has a responsibility to collect accurate information. I urge the City to re-test, or better yet, yield to the majority of citizens who are opposed to the project and Just Say No.

Sincerely,

Christine Jeszeck
1029 N Z St
Lompoc CA 93436

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JUL 27 2016

Planning Division

Letter No. 26: Christine Jeszeck, July 27, 2016

Response 26-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 26-2

The Draft EIR evaluated potential impacts related to a number of topic including air quality, airport safety hazards, traffic, and noise. The methodologies used to evaluate the various topics are provided in the Draft EIR and it appendices. In addition, clarification has been provided for some topics in this Final EIR; the reader is directed to the various Topical Responses.

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

MS Breese, AICP

Ms. Breese:

The Draft EIR for the Motorsports Park is inaccurate and incomplete. This document should not be adopted by Lompoc without being corrected. The following is not all inclusive and has not been addressed and cannot be mitigated without a complete assessment. 27-1

1. The noise Study says there is no noise issue to mitigate. This is completely inaccurate as their own data shows the project fails to satisfy the 2030 General Plan Noise Policy because it fails the following: 27-2
    a. Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City Standards."
    b. Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."
    c. Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."
2. The City will need to address issues raised by the Santa Barbara County Association of Governments (SBCAG) and the Federal Aviation Administration (FAA), as group recreation areas are "incompatible uses" for areas next to active runways after adopting the Draft ALUP. 27-3
3. Per the DEIR, "the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason" (pg. 4.2-31 of the DEIR). This means the Motorsports Park will make the air quality worse. 27-4

Sincerely

Lawrence V. Serpa Jr.

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JUL 27 2016

Planning Division

Letter No. 27: Lawrence V. Serpa Jr., July 27, 2016

Response 27-1

The purpose of a Draft EIR is to provide information the public on the proposed Project, and potential impacts. Additionally, the review period is provided for the public and agencies to make comments on the adequacy of the Draft EIR. According to the State CEQA Guidelines, Section 15088, the lead agency shall evaluate comments on environmental issues received from persons who reviewed draft EIR and shall prepare a written response, which shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the Final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the Lead Agency should either revise the text in the body of the EIR, or include marginal notes showing the information is revised in the response to comments.

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 27-2

Please refer to Response 17-1 and Topical Response 7, Noise for a full discussion on consistency to the applicable policies contained within the City's General Plan Noise Element. It was determined based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact. Based on the findings, the proposed Project would be consistent with Policies 1.1, 1.2, 2.1, 2.3, and 2.4 of the Noise Element.

Response 27-3

Please refer to Response 17-2.

Response 27-4

Please refer to Response 17-3.

Begin forwarded message:

From: <WFasold@aol.com>
Date: July 28, 2016 at 7:41:39 PM PDT
To: <L_Breese@ci.lompoc.ca.us>
Subject: Motorsports Park EIR

I have read the EIR and has found serious deficiencies in the noise section of the EIR. Namely the study is seriously flawed in the following ways:

1. Background noise levels appear to have been deliberately taken near a very busy and noisy traffic intersection gives a false baseline of typical ambient noise levels. There is a lack of data collected, the location is wrong and the times of day relative to proposed track operations do not correlate
2. Noise attenuation data is not correct
3. Noise levels around peoples homes should not be estimated or read assuming people keep their doors and windows shut in a region where most household have no air conditioning and use cool ambient air to lower the temperature inside their home. Furthermore people who want to be outside in their yards should not be subjected to this noise. 28-1
4. I also challenge the use of taxpayer money to support this endeaver. Grant funds are a gift they are taxpayer money. The City of Lompoc is listening to a minority of people and obvious interests outside the region over the voice of he majority of people who would be affected in the areas nearest the proposed location. This affects residents living in Lompoc and nearby county residents also. 28-2

In summary the noise study is invalid for lots of reasons and should not be accepted as credible. Reject the study. This deficiency invalidates the EIR. Reject it or force them to do it over with a validated study. 28-3

Walter Fasold - a Mesa Oaks resident

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JUL 29 2016

Planning Division

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Letter No. 28: Walter Fasold, July 29, 2016

Response 28-1

As discussed in the Draft EIR, Section 4.10, Noise, ambient noise is defined as the level of noise that is all encompassing within a given environment, being usually a composite of sounds from many and varied sources near to and far from the observer. No specific source is identified in the ambient environment.

Ambient noise measurements were undertaken to establish existing noise levels at various locations in the proximity to the proposed Project site. The monitoring was conducted to collect data on ambient noise sources within the Project site, including road traffic and operation of the Lompoc Airport and Skydive Santa Barbara.

Measurements were undertaken on Wednesday, February 17, 2016, during the AM peak hours (7:00 AM to 9:00 AM). Some measurements were outside of the AM peak hour as one meter was used throughout the measurements period to collect data. In addition, noise monitoring was coordinated with Skydive Santa Barbara on Wednesday, March 30, 2016, and measurements were collected with aircraft takeoff/landing and without aircraft takeoff/landing to categorize the existing ambient noise environment.

It was determined interior noise levels would be below 45 dB(A) for residential, commercial, and industrial uses with the windows open and closed. Furthermore, due to the increase from ambient noise was less than 3 dB(A), that noise during the operational phase would result in a less than significant impact.

Please refer to Topical Response 7, Noise, for a more detailed discussion regarding methodology related to noise.

Response 28-2

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 28-3

Please refer to Response 27-1.

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

August 3, 2016
Anne Jimenez
2802 Lewis Drive
Lompoc, CA 93436
805-733-1114

City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436
Attn: Lucille T. Breese, AICP

Ms. Breese,

The Lompoc Airport is a valuable asset to our community. Lompoc's quality of life is one to be envied. In both these regards, however, I find the EIR for the Motorsports Park to be inaccurate, inadequate and skewed in favor of the park, especially regarding noise, air pollution, traffic and environmental threats. Above all, the Motorsports Park is not compatible with airport use on airport property or with the Airport Master Plan. 29-1

Regarding the airport, the EIR states the Motorsports project will improve the Skydive Santa Barbara landing sites. In fact it will not. It will greatly increase the risks to sky divers. The current landing site must be changed to a less desirable one. There will be increased dust and dirt in the air hampering the sky divers and damaging the planes and buildings. Instead of helping the businesses at the airport as the EIR states, the park will likely force them to leave Lompoc, a big loss to the city on many levels. 29-2

Environmental impacts to the area in and around the airport will be exacerbated not minimized. Plants will be harmed by the increased dust and dirt. Animals will move out of their habitat to escape the noise, lights and dust. 29-3

The planes and buildings at the airport will be infiltrated with dust and dirt from the racetracks, a very negative impact on the airport and its operations. 29-4

Traffic as a result of the park is not insignificant. Road access to the airport will be restricted and congested with the increased traffic hampering use of the airport and access by emergency vehicles.
The entrance at George Miller Road will be extremely difficult for large vehicles and trailers to negotiate. Will traffic lights have to be installed? There will be a definite negative impact on traffic flow in and out of the city. 29-5

The use of V Street will be a nightmare for residents of that neighborhood and will cause more congestion, noise and pollution in that area.

The park will in no way helps to preserve the airport as implied in the EIR. The airport stands to lose 7 acres of land that it has already planned to use for a future extension of the runway. The park will restrict and infringe on airport use now and growth in the future. 29-6

The EIR states it will improve runway safety zones. False. The safety zones are designed to protect both planes and people on the ground. The planned park sits mainly in one of the safety zones. If there is an accident, a plane may likely veer off into the proposed grand stand and crowds at the park. It is clearly stated that stadiums and recreational uses are prohibited in airport safety zones.

The expansion of V Street to allow entry into the proposed park is also putting many people at greater risk, as they will be under the flight path of plans taking off from the airport. 29-7

Planes coming in for a landing at night may be adversely effected or even blinded by all the lights from the park during races. Has that been considered?

Finally, the airport is in jeopardy of losing the "over-run" area at the end of the landing strip. There have been accidents in the past when that area has been critical and some planes have crashed or had emergency landings in the agricultural fields at the end of the airport. This area is an integral part of the airport and required for safety reasons.

These issues cannot be dismissed and need to be addressed specifically by the EIR. 29-8

Regarding noise and the environment, the methodology used for the noise study in the EIR was intentionally designed to skew the results in favor of the Motorsports Park. Serious issues were minimalized to serve the best interests of Meridian.

The noise sampling that was done was incomplete and inadequate and did not at all reflect the true nature of the noise and its impact.

They only sampled one day from 9am to noon, on a Monday; chose poor, non-representative locations for their monitors; and did not use realistic noise levels of many cars racing. They should have sampled over several days at different times in order to take into account variable winds and weather. They need to sample in unobstructed paths from the park to the actual houses that will be impacted by the noise, especially those on or near the bluffs up by the Y. As proof of the importance of this, we live several house in from the bluff in Mesa Oaks and on many days can hear the band practicing at Lompoc High School, a considerable distance away. The wind and weather have an impact on how noise travels and it is different from day to day. This was not accurately tested by Meridian. 29-9

Additionally, Meridian placed at least 2 of their noise monitors in areas protected to some degree from the very noise they were supposed to be sampling. One was placed behind the

hill with the flagpoles and a second was placed in a depression farther away, again protected from the noise. This appears to be blatant manipulation of the testing to favor the park. I challenge them to put sound monitors up where the actual houses are that will get the brunt of the noise. 29-9

Also, what are the actual noise levels at the property line of the airport and of the proposed Motorsports Park? Are they within the legal limits once past the property boundaries?

Environmentally the proposed park is in a flood zone. If and when there is a flood, the Santa Ynez River will be contaminated with oil and toxic waste from the park. Will the infiltration ponds mentioned leach into our ground water? Not acceptable and irresponsible. 29-10

All of these issues need to be further investigated and addressed. The proposed park is in violation of many airport regulations and is infringing on the lives of many local residents. 29-11

Thank you,
Anne Jimenez

Letter No. 29: Anne Jimenez, August 3, 2016

Response 29-1

Section 4.9, Land Use, of the Draft EIR provides a discussion of the land use compatibility of the proposed Project. As discussed, the proposed Project is consistent with the appropriate land use designation and meets the City's zoning requirements. According to the City's General Plan Land Use designation the proposed Project is located within Community Facilities and zoned for Public Facility uses. Zoned Public Facility areas are currently located next to various residential communities within the City and border the Lompoc Airport; therefore, the proposed Project's zone classification and location would be consistent with existing conditions.

Please refer to Topical Response 5 regarding land use compatibility.

Response 29-2

Please refer to Response 14-1 and Topical Response 8 regarding Skydive Santa Barbara (SDSB).

Response 29-3

Section 4.2, Biological Resources, of the Draft EIR provides a discussion of impacts to plants and animals. In addition, please refer to Topical Response 4 regarding indirect biological impacts.

As discussed, proposed Project operation, noise levels, vibration, dust and lighting impacts would be temporary, and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

Response 29-4

Please refer to Response 13-1.

Response 29-5

As proposed, and detailed in the Project Description (Section 3.0), George Miller Drive would solely be used for smaller events and for emergency vehicles only during large events. A left- turn lane is provided on the SR 1 at George Miller Drive for vehicles that may need more time to turn. V Street would provide access for vehicles during larger events. The portion of V Street that would be used by the proposed Project is from Central Avenue to the proposed Project location. There are no neighborhoods or houses located along that section of V Street.

Section 4.13 of the Draft EIR, discusses traffic and the resultant conditions with the proposed Project. The Draft EIR determined with the implementation of the proposed mitigation measures MM 4.13-1 and MM

4.13-2 and compliance with project design feature PDF 4.13-1, traffic impacts would be less than significant.

Response 29-6

Please refer to Topical Response 5 regarding land use compatibility.

As discussed, the FAA approved the City's proposed Airport Layout Plan (ALP) in 2011. The approved ALP does not include any improvements in the area where the proposed Project is to be located. Currently, the ALP is being updated to include additional improvements including the proposed Project, a sewer line running sub-surface, and a capital improvement plan to upgrade electrical features and rehabilitate the Airport's north apron. In addition, the Lompoc Airport Master Plan Update does not include any future improvements within the proposed Project's boundaries. Any revisions to the ALP are subject to review and approval by the FAA before the City can implement the proposed Project.

Response 29-7

Please refer to Topical Response 1 regarding airport safety.

As discussed in the Draft EIR, Section 4.7, Hazards, the Lompoc Airport is expected a probability of about 0.11 off-airport accidents per year for its current estimated activity level of approximately 30,000 annual operations.[2] The proposed Project would have a negligible effect on airport accident risks because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the airport.

In addition, the proposed Project falls under the jurisdiction of the Airport Land Use Plan (ALUP) which identifies the proposed Project is located within Zone II Safety Area 2 and Safety Area 3. The proposed Project is considered to be a compatible use for both areas. According to SBCAG's review of the proposed Project, the motorsports park is not subject to additional review by the ALUC.

As discussed in the Topical Response 1, Airport Safety and in Section 4.9, Land Use, of the Draft EIR, the expansion of V Street would penetrate the existing Approach/Departure Surface Area. However, the Draft EIR has identified mitigation (see MM 4.9-2) that will restrict access to vehicles that would be tall enough to penetrate the Approach/Departure Zone or requires the access elevation to be lower than currently proposed.

The Draft EIR notes proposed Project operations, including lighting, would be sporadic and temporary, and limited to specific Project events. Section 4.1 (see page 4.1-15) of the Draft EIR notes outdoor lighting

2 Heliplanners, *Aviation Safety Analysis* (March 2016).

would comply with Title 24, Part 6 of the California Code of Regulations, Energy Efficiency Standards for Nonresidential Buildings. All lighting shall conform to the standards set forth in the Lompoc Municipal Code. Lighting to illuminate event areas will be used during events, but shall be shielded and focused downward reducing direct light in the direction of open space and the Santa Ynez River. Lights would be meet FAA standards, and the fixed light towers would also have aircraft warning lights atop each pole. The proposed Project's lighting would be cleared by the FAA; therefore, safety impacts related to lighting features would be less than significant.

As discussed in the Draft EIR, the proposed Project site is currently in an area characterized by trees and shrubbery and does not pose as a suitable emergency landing option for aircrafts. Therefore, the proposed Project would not cause any significant impact to the emergency land area.

Response 29-8

Please refer to Response 29-7 above.

Response 29-9

Please refer to Response 13-1 and Topical Response 7, Noise.

Response 29-10

Please refer to Response 21-4 and Topical Response 3 regarding Hydrology.

Response 29-11

The comment is noted for the record and will be forwarded on to the appropriate decision makers. The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

-----Original Message-----
From: J Norris [mailto:john.g.norris.jr@gmail.com]
Sent: Tuesday, August 02, 2016 3:27 PM
To: Breese, Lucille
Subject: Motorsports Park Draft EIR

Good afternoon,

I have been jumping at Skydive Santa Barbara for the last year and a half. I am totally opposed to the creation of this park directly in the landing area. Considering Lompoc is a relatively small town surrounded by other unoccupied terrain, why is the construction of this motor sports park not being considered elsewhere?

The skydiving community is very tight-knit. We view this drop zone as our second home. Someplace where we can live "in the moment" & share unforgettable times with people we consider our family. The construction would not only unquestionably impact the revenue generated for the town by SSB, but it would break this family apart due to the stresses of having to travel even farther. 30-1

In fact, I met my soon-to-be wife after going to this drop zone for the first time on a whim. I drove all the way from San Diego on a long weekend. Here we are close to two years later & we scramble to the drop zone if schedules permit. It is our favorite pastime & having such a landmark in Lompoc forced to move elsewhere because some park that could easily exist elsewhere is trying to occupy the landing area would be detrimental to the town, memories (not just mine) & the relationships forged therein.

Please consider building the park elsewhere & do not impede the operations of Skydive Santa Barbara.

Respectfully,

J. Norris
Semper Fi

Sent from my iPhone

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AUG - 3 2016

Planning Division

1

Letter No. 30: John G. Norris, August 3, 2016

Response 30-1

Please refer to Response 14-1 and Topical Response 8 regarding Skydive Santa Barbara.

From: judi alderman [mailto:judialderman@hotmail.com]
Sent: Wednesday, August 03, 2016 2:28 PM
To: Breese, Lucille
Subject: Motor Sport Thing

To whom it may concern, Motorsport Thing

It concerns me, I have lived in Lompoc all my life, and I hate to see Lompoc doing it again as I ask the question, why would the council cause an establish business that causes no problem at all, (like the Skydive SB) has no real environmental impact to leave so that a nothing but environmental impact business could dig up ground and cost us a bunch of money. My suggestion is why don't they put this in a place that is unfit, like the property on the east end of Laurel where Grefco use to be. This may even help the ground, is no good and it is a large piece of property next to the river, and it wouldn't cause someone else to go out of business. 31-1

Now while we are on the subject of Lompoc and it's poor choices, why in the world are we allowing a Russian to come into town with a wild plan of a space center. What is wrong with Lompoc that they can't plan there own Space Center. This person has already failed once, but she is not stupid she sees an easy mark in Lompoc. What exactly does she have that we or someone in Lompoc doesn't, I have been to the Space Center in Huntsville, it is wonderful, much of the space stuff they have only they have and Lompoc is late as usual. So just don't do that with this stranger from Russia, foolish. 31-2

One last word, WHAT ABOUT THE TREES YOU HAVE CUT DOWN, REPLACE THEM. Sorry that was more than one word. 31-3

Sincerely, I Love Lompoc.

Judith Alderman
judialderman@hotmail.com
805-717-1808

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AUG - 4 2016
Planning Division

1

Letter No. 31: Judith Alderman, August 4, 2016

Response 31-1

Please refer to Response 13-3 regarding alternate sites considered and Topical Response 5 regarding land use compatibility. Please refer to Response 14-1 and Topical Response8 regarding Skydive Santa Barbara.

Response 31-2

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 31-3

As noted in Section 3.0, Project Description, of the Draft EIR, the proposed Project includes the opportunity for the re-establishment of riparian woodland and willow scrub habitat and the replacement of riparian trees and shrubs that had been removed for the Lompoc Airport Runway Expansion Project in 2001. If still required to do so, then the proposed Project would be required to reestablish mitigation areas at a location suitable for the vegetation type identified in the SAA.

Please refer to Topical Response 6 for additional information specific to the existing mitigation area and the City's obligation to fulfill the SAA.

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From: Steve Castro [mailto:lgm30f@verizon.net]
Sent: Thursday, August 04, 2016 9:51 AM
To: Breese, Lucille; Lingl, Bob; Starbuck, Dirk; Vega, Victor; Mosby, Jim; d_homdahl@ci.lompoc.ca.us
Subject: Against Motorsports Park

Honorable Bob Lingl, Dirk Starbuck, Victor Vega, Jim Mosby, and DeWayne Homdahl,

I strongly oppose the proposed Motorsports Park to be located in Lompoc. I feel the environmental impact study pertaining to noise abatement is slightly fabricated. The EIR addresses issues for muffled exhaust systems, however, vehicles will be permitted to operate with open exhaust systems. Additionally, open headers is a completely different issue. 32-1

Page 3.0 – 29 states:

"OHV Riding and Racing Events
OHV racing events would begin at 9:00 AM and would conclude one hour before sunset unless the lights are used, in which case events would end at or before 10:00 PM. A variety of OHV events and activities would be accommodated by the proposed Project. Note that any motor vehicle operated off highway is considered an OHV. Additionally, a highway-licensed vehicle is an OHV when operated off of the highway. However, some of the more common OHVs include ATVs, dirt bikes, sand rails, and recreational utility vehicles. All vehicles in the OHV area must have California-legal exhaust device. Vehicles permitted for mud bog/sand drag events only will be permitted open exhaust." 32-2

Page 3.0 – 30 states:

"Drag Strip Events
Drag racing events would begin after 9:00 AM and would end by sunset until the lights are installed, and would end at by 10:00 PM after the lights are installed. Local drivers for local drag strip events would drive their street legal vehicles to the strip, and semi-professional and professional teams would bring one or more vehicles and trailers. The number of spectators and participants for drag strip events would vary depending on the time, day, and type of drag event, as shown **Table 3.0-2**. Weekend and Saturday drag racing would be required to have 60 percent muffled exhaust devices. The Division Finals Weekend,
Specialty Drag Racing Weekend, and Specialty Drag Race Events would be permitted to have open exhaust and open header classes. The private track rental would be permitted open exhaust. Overnight RV camping would be allowed during the events."

Open exhaust and open headers will undoubtedly exceed 88dB as stated in the EIR as the maximum noise level.

I also feel that the proposed Motorsports Park will ultimately force Skydive Santa Barbara to relocate to a different city. This business has proved to be welcomed by the City of Lompoc and has provided income and pleasure for the residents of the Lompoc community. 32-3

1

Please deny this project, the draft EIR contains many inadequacies that obligate the council to deny this proposal on behalf of the citizens of the Lompoc community. 32-4

Respectfully submitted,

Steven M. Castro

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AUG - 4 2016

Planning Division

2

Letter No. 32: Steve Castro, August 4, 2016

Response 32-1

Section 4.10, Noise, of the Draft EIR provides a detailed discussion related to noise impacts that could occur. In addition, the commenter is directed to Topical Response 7, Noise for additional information and clarification on methodologies used.

The comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 32-2

Please refer to Topical Response 7 for a full discussion regarding noise impacts.

As discussed, the Off-Highway Motor Vehicle Recreation Act of 2003 establishes standards for regulating noise levels generated from the operation of motor vehicles. Specifically, OHVs manufactured on or after January 1, 1998, shall be limited to not more than 96 dB, and if manufactured prior to January 1, 1998, to not more than 101 dB, when measured from a distance of 20 inches. As the operators of the proposed motorsports park would be able to control the use of vehicles on the proposed Project site, it was assumed they would prohibit any vehicles retrofitted with after-mark mufflers and that did not meet manufacturers specifications. As such, it was determined noise during the operational phase would result in a less than significant impact.

Response 32-3

Please refer to Response 14-1 and Topical Response 8 regarding Skydive Santa Barbara.

Response 32-4

The comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

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AUG - 4 2016

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From: Patty Darr [mailto:pdarr709@gmail.com]
Sent: Wednesday, August 03, 2016 9:56 PM
To: Breese, Lucille; Starbuck, Dirk; Lingl, Bob; Vega, Victor; Holmdahl, DeWayne; Mosby, Jim
Subject: Ken@sbcan.org

Re: Proposed Motor Sports Park

I would like to thank Ken Hough (SBCAN) for his excellent commentary relating to the proposed Motor Sports Park in the August 3rd issue of the Lompoc Record. I agree with him 100%. He clearly addressed every important aspect of the EIR and the obvious reasons this project should be denied by the City of Lompoc. 33-1

I have lived in Lompoc since 1960 and as a long time resident I am very much alarmed by the potential negative impacts of this project. I live on the northeast side of town near the multi-purpose trail. The noise created by vehicles (dirt bikes, trucks, ATV's) being driven illegally on the trail and in the riverbed between Riverside Drive and River Park can be heard at my house on 8th Street. When walking the trail we have been dusted by dirt bikes and nearly run over by ATV's and large trucks coming back onto the trail from the riverbed. Signs clearly posted on the trail prohibiting these vehicles are blatantly disregarded. I have never seen the LPD or SB County law enforcement go after the offenders. The absolute last thing this town needs is more noise and pollution coupled with the discourteous behaviors and destruction of the environment by a drag racers whether in a legal park setting or in the riverbed. The supporter who made the comment this proposed park would "save lives" is delusional. Building a motor park will encourage more street racing and attract a contingent who appear to have little or no regard for the environment or respect for other citizens who prefer to walk the trails. There are many other parks and areas in Lompoc that need improvement where local taxpayer monies would be better spent before we throw $$ away on this ill conceived motor sports project. 33-2

Finally, may I suggest cleaning up the eye sore as you enter Lompoc on Hwy 246 just past Hibbits Ranch. All types of junk and run down cars mixed with fallen eucalyptus trees hanging over a broken chain link fence is not a good first impression. A safer crossing for the homeless contingent who must cross the bridge (many times with small children in tow) every morning and night should also be a high priority. If Lompoc wants to present as a tourist destination we need to clean up this entry to the city. The gateway to the Lompoc wine ghetto looks like a ghetto. 33-3

Thank you for your consideration.

Patty Darr

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AUG - 4 2016

Planning Division

2

Letter No. 33: Patty Darr, August 4, 2016

Response 33-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 33-2

As stated in Section 3.0, Project Description of the Draft EIR, one of the proposed Project's objectives is to reduce illegal riding in the Santa Ynez River bed and street racing. However, as with any illegal activities, one cannot fully preclude their occurrence.

Section 4.11, Noise, of the Draft EIR provides an evaluation of the potential noise impacts. In addition, the commenter is directed to Response 13-1 and Topical Response 7, Noise.

Response 33-3

The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR and does not address the proposed Project; therefore, no further response is necessary.

From: Molly Gerald [mailto:mollyfgerald@gmail.com]
Sent: Wednesday, August 03, 2016 3:08 PM
To: Breese, Lucille
Cc: Lingl, Bob; Starbuck, Dirk; Vega, Victor; Mosby, Jim; Holmdahl, DeWayne; Wiemiller, Patrick
Subject: Motorsports Project EIR

Dear Ms. Breese - after attending the August 1st meeting of the Airport Commission, I would like to ask that the City heed the assessment of the Commissioners who spoke with damning statements regarding the location of the Motorsports Project at the Lompoc Airport. Based on these statements, going forward would in no way be in the best interest of the City and its residents. It is hard to fathom how this project could move forward given the incompatibility clearly explained by the commissioners after their review of the EIR. 34-1

Molly Gerald, Lompoc resident

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Planning Division

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Letter No. 34: Molly Gerald, August 4, 2016

Response 34-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Ms Breese:

In reviewing the Draft EIR for the Motorsports Park, I found several areas to be inaccurate and incomplete. I believe this document should not be adopted by the city without major revisions. Several areas fail to address my concerns. The following subjects should be reviewed and added to the next report. 35-1

1- **Noise**: The noise test done in those several locations for regular traffic in Lompoc does not do anything. What needs to be done is noise testing with 2 high performance cars drag racing and at the same time with 10 or 15 motorcycles running, that will better reflect the noise level. To have the park open all day, all week will be a great noise annoyance. Now when you do the test with high performance cars, please note what kind of cars, exhaust, motor etc. 35-2
2- **Water**: We are in a drought season and the amount of water you show using from the Lompoc reserve is really very high and not acceptable, plus, the water used to clean the track will be going in our Lompoc Drinking Water. Are there any efforts to do more filtering? 35-3
3- **Airport**: I thought there were distances required between airport and recreational parks...What is the approved distance? Then have you considered the insurance required in case of accidents god forbid but a plane crashing in the stands? 35-4
4- **Emergency vehicles**: It is required to have at all times an ambulance and fire truck there. Does Lompoc have an extra fire truck and ambulance? They will have to be there all days during regular hours. 35-5
5- **RV Park**: The Motorsport Park is not an RV park so allowing RVs to stay there overnight is not permitted, not mentioning where people will do their dumping. 35-6
6- **Birds/wildlife/ fauna/flora**: The report states it is negligible the effect of the park on Wildlife etc. Well the noise and the dirt etc ...will push them away. 35-7
7- **Hazardous material**: Has there been an investigation as to see if those pipes on the site are covering toxics materials tanks? 35-8
8- **Recusal of City Council board member**: I was told one of the members has shares in the projects. That person should recuse themselves as I don't feel they can be impartial. 35-9
9- **Street access**: I believe there are rules regarding having access to the park and needing 2 turning lanes. This would mean at the entrance access to the park, some property will need to be bought in order to widen Central. Was that taken in consideration? 35-10

I moved to Lompoc to be in a nice quiet place to retire. This Motorsports Park will be very noisy and 7 days a week, wow! My husband use to race the ¼ miles with a street legal car. Let me tell you just starting the car would have our house shake, so I know what noise this park will cause. Plan the park somewhere else, please. 35-11

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I hope to see answers to my questions in the next report.

AUG - 4 2016

A very concerned Lompoc resident

Planning Division

Letter No. 35: Lompoc Resident, August 4, 2016

Response 35-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 35-2

As discussed in Section 4.10 of the Draft EIR, noise modeling was conducted to find the predicted event-related sound levels at several representative locations throughout the adjacent area for three event scenarios: (1) Drag Strip Racing; (2) Drag Strip Racing and OHV Trail Ride Area; (3) and OHV Major Events. In addition, several measurements were conducted on the Project site on February 17, 2016, between 10:47 AM and 11:18 AM. To quantify specific engine noise from the types of vehicles that would use the drag strip, controlled vehicle engine tests were conducted

Please refer to Topical Response 7, Noise, for a more detailed discussion regarding methodology related to noise. As discussed, the highest increases occurred during the Drag Strip/OHV Trail Ride Area scenario, with exterior noise levels increased by 2.2 dB(A) at nearby sensitive receptors when compared to the existing noise levels. It was determined that based on the increase of less than 3 dB(A), that noise during the operational phase would result in a less than significant impact.

Please see Response 13-1 and Topical Response 7, Noise.

Response 35-3

Section 4.14, Utilities, of the Draft EIR provides a discussion on the potential water supply.

As stated in the Draft EIR, the City's Water Division provides services for the production, treatment, and distribution of safe drinking water. The sole source of potable water within the City of Lompoc is derived from groundwater resources through the pumping of the Lompoc Groundwater Basin.

As stated in, Section 3.0, Project Description, of the Draft EIR, the proposed Project would install 4-inch nonpotable water supply lines. The 4-inch lines would extend east–west across the northern and southern portions of the OHV area and along the Enduro Cross and Arena Cross areas. Additional 4-inch lines would extend north–south adjacent to the beginner's track and oval track, and along the east and west portions of the mud bog and sand drag lanes. A 2-inch potable line would travel east–west along the southern portion of the OHV area, with another 2-inch potable line extending north to the oval track. In addition, a water well for nonpotable water needs may be drilled within the proposed Project site, at the sole discretion of the City, on property adjoining George Miller Drive and outside of the OHV area.

A new 10-inch fire hydrant water main with a shutoff valve would be tapped into the existing line located within George Miller Drive. New fire hydrants with shutoff valves would be located at the western end of the drag strip and in the OHV pit area.

Surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road. All surface water runoff would be captured in these two areas, with no runoff draining to the Santa Ynez River.

Response 35-4

Please refer to Topical Response 1, Airport Safety, and Topical Response 5, Land Use Compatibility specific to airport safety hazards.

As noted in Section 4.9, Land Use, of the Draft EIR, the current land use plans associated with the Lompoc Airport do not identify a required distance between airports and recreational areas. However, they do identify specific Safety Zones and their allowable land uses. As discussed in the Draft EIR, the presently adopted ALUP identifies three safety areas around the Lompoc Airport: Safety Areas 1—Clear Zone, Safety Area 2—Approach Zone, and Safety Area 3—Airport Traffic Pattern Zone. The proposed Project lies within Safety Area 2 and Safety Area 3. The proposed Project is considered to be a compatible use for both areas. According to SBCAG's review of the proposed Project, the motorsports park is not subject to additional review by the ALUC.

The comment regarding insurance costs does not address any concerns with respect to the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 35-5

Section 4.11.1, Fire Protection Services, of the Draft EIR details the existing Lompoc Fire Department (LFD) facilities and equipment.

The LFD operates two fire stations with a combined total staff of 30: 29 budgeted suppression-qualified personnel and one administrative personnel with a minimum staffing of 9 on duty between the two stations. Station No. 1, which is also the administrative headquarters, is located at 115 South G Street and houses one fire engine, one ladder truck, one rescue/quick response Rescue squad, and one brush engine. Station No. 1 is located approximately 2.3 miles southeast of the proposed Project site. Station No. 2 is located at 1100 North D Street and houses one staffed fire engine and one reserve (unstaffed) fire engine. Station 2 is approximately 1.2 miles from the proposed Project site; therefore, that station would be the first responder as the response time would be less than 5 minutes from the time the alarm is received at

the station. The proposed Project site is located within the City's 4-minute or less, 90 percent of the time, travel time performance objective.

The proposed Project would produce an increase in demand for fire services during the events held on site. The increase in participants and spectators traveling to the site from different areas, locally and regionally, would increase the risk for potential fire and medical hazards on site. Fire and medical risks associated with the OHV and drag strip events would include vehicular damage and collisions. Those risks, combined with one or more off-site fires and/or car accidents, may impact the local responding units.

As noted in Comment 11-55 from the Lompoc Valley Parks and Pool Foundation, the International Hot Rod Association (IHRA) requires a paramedic ambulance be on site for any racing to occur. In addition, a truck equipped with vehicle fire suppression equipment and trained staff must be on site. Motocross events would also require a paramedic ambulance on site.

As discussed in the Draft EIR, the Applicant will coordinate with the Lompoc Fire Department to develop and implement an Incident Plan as required by MM 4.11-1. The Incident Plan will identify the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications and supervisory personnel. In addition, the Plan would also identify fire suppression equipment, supplies, and other services to be provided by the site operator during future motorsports events, including the number of fire personnel and/or EMS personnel.

Response 35-6

As noted in Section 3.0, Project Description, of the Draft EIR, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the proposed site. No provision for RV hookups (water, sewer, electric) are proposed; thus, all RVs would be required to be self-contained.

Because the proposed Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use.

Response 35-7

Section 4.3, Biological Resources, of the Draft EIR provides an evaluation of the impacts to wildlife. In addition, please refer to Topical Response 4 regarding indirect impacts to biological resources.

As discussed, the proposed Project operation related noise levels, vibration, dust and lighting impacts would be temporary, and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

Response 35-8

As discussed in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, information was gathered from the review of various hazardous materials databases and included a site-specific Phase 1 Environmental Site Assessment (**Appendix 4.7A** of the Draft EIR).

The proposed Project site has previously been used by a succession of businesses, including sand and gravel operations, an asphalt plant, a metal fabrications business, a roofing company, scrap metal processing, and contractor equipment yards. Currently, the proposed site's condition is that of abandoned industrial uses and contains former building slabs, debris, dirt roads, and natural vegetation.

The Draft EIR notes the proposed Project site is not designated as an "Irrigated Lands Regulatory Program Site," a "Land Disposal Site," "Cleanup Program Site," or an "Oil and Gas Monitoring Site." The proposed Project site is neither considered a leaking underground storage tank (LUST) cleanup site nor permitted as an underground storage tank facility. The proposed Project site does not contain any permitted operating or cleanup sites. There are several sites reporting to the USEPA for various activities related to hazardous waste and toxic materials in the general vicinity of the proposed Project site, but none currently within the proposed Project site itself. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, no oil wells are located on the proposed Project site.

Response 35-9

The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 35-10

As noted in Section 3.0, Project Description, of the Draft EIR, the proposed Project would construct a 30-foot-wide road from the George Miller Drive entrance on the eastern end of the proposed Project site to connect with the new V Street access road on the western end of the proposed Project site.

The George Miller Drive access point would be used for weekday access, private rentals for nonracing event access, and all emergency vehicle access to the proposed Project site. The existing paved entry roadway from George Miller Drive would be repaved with asphalt to a width of 30 feet to the bottom of the hill.

The V Street access point would be used for weekends, holidays, and special event access. Additional new roads would provide circulation around Pit Area 1, through the OHV area, and along parking areas north of the drag strip. The proposed roadways are illustrated in **Figure 3.0-7, Conceptual Roads, Fences, and Gates.** Emergency vehicle access would be provided from the V Street and George Miller Drive entrances.

Roads would be either 25 or 30 feet wide, with all 30-foot sections providing two-way travel. Roadways would be constructed of 11 inches of recycled Class 2 base over 1 foot of compacted native soil (two-way traffic, one-way traffic, and emergency vehicle access) or 6 inches of Class 2 base and 12 inches of compacted native soil (one-way parking lot traffic).

To provide weekend and holiday event access to the proposed Project site, the proposed Project would connect to the existing V Street and go north along the western perimeter of the airport property, along an existing quarry road. When completed, this 30-foot-wide access road would be a minimum of 10 feet below the existing airport runway grade and would carry two-way traffic. The newly aligned access road would be dual purpose, serving both the proposed Project site and the existing adjacent sand and gravel operation.

An 80-foot fire truck turning area would be provided at the western end of the proposed Project site, near the pit area. A new 6-foot-high fence separating the access road from the airport would be installed more than 300 feet from the end of the runway.

Response 35-11

Section 4.10 of the Draft EIR evaluated noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events. Please see Response 13-1. In addition, please refer to Topical Response 7 for a discussion regarding noise impacts.

-----Original Message-----
From: Maria Lydia Baltierra [mailto:mlbaltierra@hotmail.com]
Sent: Sunday, August 07, 2016 4:39 PM
To: Breese, Lucille
Subject: The proposed motor cross near the airport

Dear City Council

I am very much against the city investment in a motor cross track.
I believe the race track will appeal to a very small minority of city residents while the clear majority of us will be burdened with the eventual financial cost. In addition to the potentially financial cost it is that it is clear
to me that most of my fellow residents are opposed to Lompoc pursuing this environmentally destructive form of recreation. It is good that we want to invest in our future, but we should make investments in programs that serve the greatest number of our citizens, not a privilege of the few that can afford the time and expense of race car ownership. 36-1

María L Baltierra
805 736 0455

Sent from my iPad

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AUG - 8 2016

Planning Division

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Letter No. 36: Maria L. Baltierra, August 8, 2016

Response 36-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Breese, Lucille

From: Jason Nasato [jmasato@yahoo.com]
Sent: Saturday, August 06, 2016 8:36 AM
To: Breese, Lucille
Subject: Motor Sports Park

This project must be denied! 37-1

V.V. to Olive Street is 4 miles and 7th Street to Floradale Ave is 3 miles. The proposed location is in between the residences of V.V., Lompoc and the "Y" area. This is where the majority of people live. 37-2

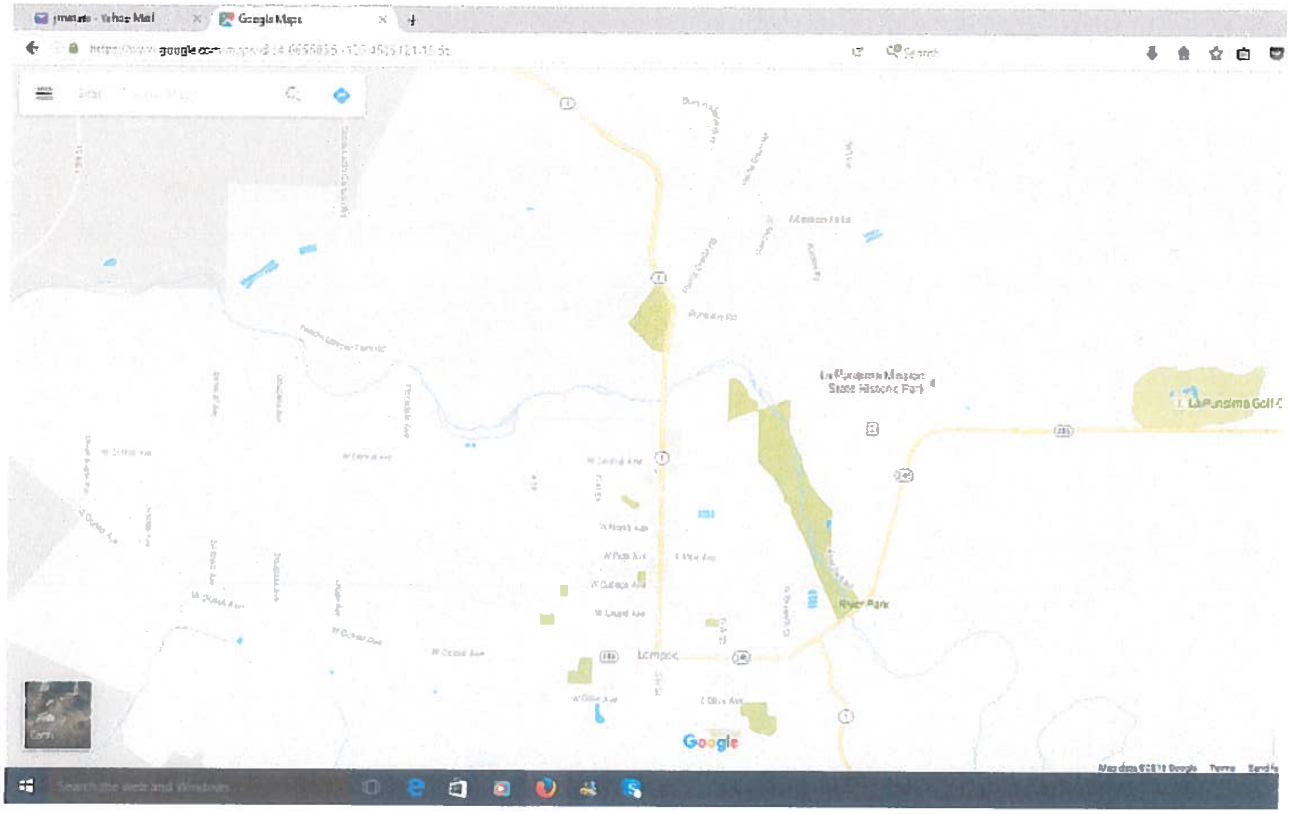
Don't take a chance to approve something that has the biggest risk of noise, dust and engine emissions in the center of our homes. Keep this out and away from the little 4 mile square we live in. 37-3

Basic facts:

- Airport runway to Olive Street - 2.25 miles
- 7th Street to Floradale Ave - 3 miles
- Airport runway to the "Y" - 5000 feet
- Airport runway to Celestial Way V.V. - 1.7 miles

37-4

This project is inconsiderate of the resident population just outside the city limits by us having no voice at Lompoc City Council Meetings. (voice = a vote) 37-5



Jason Nasato

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Letter No. 37: Jason Nasato, August 8, 2016

Response 37-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 37-2

The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 37-3

Please refer to Topical Response 7, Noise, regarding impacts to noise. The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Please refer to Response 13-1.

Response 37-4

The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 37-5

The issue raised by the commenter does not address any concerns with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

-----Original Message-----
From: Barry Weaver [mailto:barryweaver@me.com]
Sent: Sunday, August 07, 2016 1:04 PM
To: Breese, Lucille
Subject: Letter to City Council Concerning Motor Sports Park

Dear Council Members,

This year the U.S. National Oceanic and Atmospheric Administration, well known as NOAA, published a report that 2015 was the hottest year in recorded history. This global temperature increase showed United States producing 20 percent of all heat warming emissions (see Scientific American Aug 2016). With nearly a hundred countries participating, and hundreds of scientist working on this report, it is too serious to be disregarded. In fact, auto born pollution actually increased in 2015.

Cars, powered from fossil fuels, are the single greatest contributor to global warming. This is well understood by most citizens today. 38-1
This needs to be crystalized into our thoughts. We are cooking the planet.

Here in Lompoc we are discussing a proposal to invest further in a project that is, and should be, an obsolete form of recreation.
A recreation for only a few. A project that will have negative effects on ourselves, our environment and on our self image as a community.
Can we truly carry the cognitive dissonance that here in Lompoc we encourage our people to participate, and actually in debt ourselves, to activities that are contrary to our best interest. As a city our priorities should be to calm traffic, promote healthy physical activities, reduce our carbon imprint and make a modern smart city.

Barry and Laurie Weaver

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AUG - 8 2016

Planning Division

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Letter No. 38: Barry and Laurie Weaver, August 8, 2016

Response 38-1

Section 4.4 of the Draft EIR evaluated impacts to greenhouse gas (GHG) emissions and climate change.

As stated in the Draft EIR, climate change is a change in the average climatic conditions on Earth that may be measured by changes in wind patterns, storms, precipitation, and temperature. Those changes are assessed using historical records of temperature changes that have occurred in the past, such as during previous ice ages. Many of the concerns regarding climate change use this data to extrapolate a level of statistical significance specifically focusing on temperature records from the last 150 years (the Industrial Age) that differ from previous climate changes in rate and magnitude.

The United Nations Intergovernmental Panel on Climate Change (IPCC) considered six alternative future GHG scenarios that would stabilize global temperatures and climate change impacts. The IPCC predicted that global mean temperature change from 1990 to 2100 for the six scenarios considered could range from 1.1 degrees Celsius (°C) to 6.4°C. Global average temperatures and sea levels are expected to rise under all scenarios.

As shown in **Table 4.3-10** of the Draft EIR**,** the operational GHG emissions for the proposed Project with project design features and mitigation measures would be 8,198.6 MTCO2e per year. That amount of GHG emissions is less than the 10,000 MTCO2e per year screening threshold for stationary land use projects proposed by the SBCAPCD. (Please note the proposed Project is not considered a stationary land use by the SBCAPCD, and the screening threshold has been used for analysis purposes only). The next threshold used for analysis purposes is to compare the SCAQMD's draft service population target (3.0 MTCO2e per year per service population).

As indicated in **Table 4.3-4** of the Draft EIR**,** the proposed Project would result in 8,198.6 MTCO2e per year with project design features and mitigation measures. The maximum number of service persons during any one event scenario would be 2,700 persons. The proposed Project would result in 3.0 MTCO2e per year per service population, which is equivalent to the SCAQMD's draft target. The proposed Project would be below the 10,000 MTCO2e per year screening threshold and would be equivalent to 3.0 MTCO2e per year per service population efficiency target. Impacts would be less than significant.

From: Janet Blevins [mailto:janro48@gmail.com]
Sent: Wednesday, August 10, 2016 10:21 AM
To: Breese, Lucille
Subject: comments on the DEIR for the proposed motorsports park

Ms. Breese,

I find it completely unacceptable that a project designed for the mere fun and recreation of a small minority of Lompoc residents would create Class I Unmitigateable Air Quality impacts known to have serious, deleterious, respiratory health impacts for nearby residents, especially children and seniors. 39-1
In addition, it will make it harder for Santa Barbara County to meet the California state air pollution standards for PM10 and ozone, standards which the county has never met.

Sincerely,

Janet Blevins
1237 Primrose Ct
Lompoc
805-717-4160

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AUG 10 2016

Planning Division

1

Letter No. 39: Janet Belvins, August 10, 2016

Response 39-1

Section 4.2, Air Quality, of the Draft EIR evaluated impacts to air quality.

Impacts associated with dust (PM10 and PM2.5) would be mitigated to less than significant.

As discussed in the Draft EIR, the proposed Project particulate emissions would exceed the local significance thresholds for particulate matter (8 $\mu g/m^3$). In accordance with **Mitigation Measure MM 4.2-1,** a Fugitive Dust Control Plan would be implemented that would require application of a water amendment with a minimum 84 percent control efficiency and would also require the V Street access road be paved. **Mitigation Measure MM 4.3-2** would require limitations with respect to the operation of the OHV component of the proposed Project.

Emission of VOC and NOx associated with the proposed Project would result from vehicle traffic, with the overwhelming majority of those emissions coming from passenger vehicles. The level of emissions generated for a single day would remain above the daily mass significance thresholds for NOx and VOC adopted by SBCAPCD. Impacts would be significant and unavoidable under these thresholds.

The City Council would be required to adopt a Statement of Overriding Considerations with regard to this impact if the City Council decides to approve the proposed Project.

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AUG 10 2016

Planning Division

3 Aug 2016

To: Lucille Breese, AICP, Planning Manager

From: Donald C. Edward, Systems Engineer

Subject: Disagreement with Motorsports Park Environmental Impact Report (EIR)

1. What gives the Motorsports Park the right to hold Off-Highway-Vehicle (OHV) or Drag Racing events from 9 AM to 10 PM, seven days a week with no regard for the peace and quiet of Lompoc and valley residents. The track will be within 0.3 miles of residential and businesses that in many cases have moved to Lompoc to enjoy the clean air, and quiet valley.
2. I find a recent statement from the Lompoc Record quite fitting: "No one's property value has ever gone up as a result of presence of a Drag Race Strip". The noise, traffic, dust and hydrocarbon pollution, will impact the life of all residents. The Motorsports Park is being pushed on the citizens of Lompoc by a few politically connected men, with no regard for the toll that it will take on the residents and the valley.

40-1

3. In reviewing the EIR, I first noted that it contained none of the Drag Strip actual live vehicle detailed dba testing that the chairman of the Motorsports Park association had promised, would be in the EIR. Mr. Linn stated at the April 2016 meeting at his office, that detail live testing was done with different types of vehicles and would include the test equipment, exact location of test equipment with distances, angles of test equipment to vehicles, and all dba reading. He stated that he could not show me the data at his office, since it was being incorporated into the EIR.

   I learned from reading the EIR support material that there was never any intent to have any real live vehicle dba data, as stated to me in much detail by Mr. Linn. Instead only computer simulated data would be used for the EIR report.

   In reading the report I found the data in the Drag Strip computer simulated data to be out of line with the typical data to be found at internet sites with articles from ESPN.go.com, Motor Sports magazine, Center for Disease Control and Prevention (CDC), and even articles by Richard Petty, that also stated that he has lost 85% of his hearing due to the thunderous core shaking sound levels. ESPN stated that Drag Racing is the Loudest Sport, with cars that idled at 115dba and blasting at 129 dba. Due to the extreme noise levels the racing associations have not been interested in tracking racing noise, and it has been within the last six years that numerous tracks have been shut down with class legal actions to remove the associated noise, traffic and pollution. In a CDC article it stated that Pit areas exceed 130 dba and that even some dba meters will cut out and not register the extreme noise levels. Since the EIR does not provide any actual data on vehicle types, testing, and the results do not approach the levels expected for open header or open exhaust all the noise data reported is insignificant. The EIR does not represent PEAK Pit noise and uses averaging of noise to further obscure the true noise events, this without open header and open exhaust distort the results.

   The data in the EIR Drag Strip noise tables 9, 10, 11, and 12 paint a picture that the Drag Strip will not provide any appreciable increase from the ambient noise ranges even at the closest location. This is because the basis for the computer simulated dba levels at the site are shown to be from 88 to 92 dba, far short of the realistic levels.

40-2

Page 1

This data does not even take into consideration the fact that one vehicle can have noise level in excess of 120 dba with open headers. If you now start considering two vehicles at 120 dba this sums to a 3 dba increase to 123 dba. If you now consider six vehicles at 120 dba, this now sums to an additional 7 dba for a total of 127 dba.
Assuming that we use the 127 dba for multiple vehicles revving up with open headers at equal noise levels using the Inverse Square Law for 127 dba, with formula distance 1, being 10 feet and formula distance 2, being one-half mile from pits at 2640 feet, the exterior dba level in residential areas would be 78.56 dba. If formula distance 2 is reduced to 0.3 miles 1584 feet, the closest residential and business areas, the exterior noise levels would be 83.04 dba. See attachment #2.
The city of Lompoc General Plan, states the exterior noise levels at the property line should not exceed 60 dba. See attachment #1. 40-2

a. The noise levels for the Motorsports Park are not consistent with the 2030 General Plan noise element, policy 1.1 on page N-9 states that "The City shall require each land use to maintain noise levels at their property line in compliance with City standards". That to me means the fenced area of the Motorsports Park. Not the Lompoc City residential and commercial buildings areas.
b. Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan." The Motorsports Park is not in any way consistent with the Airport Master Plan.
c. Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line." As you will note in my noise calculations and even with the incorrect computer generated data, the Motorsports Park does not conform at the property line fence.

4. Relative to pollution, as noted in the EIR, there would be a problem with NOx emissions, that cannot be reduced to less than significant. This means that air quality will be demonstrably worse and reduce the quality of life for all of the community. The EIR did not find significant all the dust kicked up by the motor bike riders, with events 20 times per hour, this would not be eliminated by watering. Anyone that has been to a motor cycle off-track race can attest to the amount of dirt kicked up by the tires on each turn and straight-away. The drag strip races also have similar problems with the particles of rubber peeled off with each race start and stop. That plus the noxious rubber burning smoke, smell of the fuel, and exhaust. Rain and watering of the area will create polluted run-off into non-lined catch basins that will leach into the valley ground water. All this dust, dirt and pollution will impact the airport buildings and aircraft, causing additional cost to the airport. 40-3

5. The 10 foot river embankment has been often stated as a natural wall that will block sound from going to the South of the drag strip. If you look at the actual Math involved as noted on Attachment #3 this is true to a very limited degree. If you start looking at the drag strip location 40-4

Page 2

relative to the embankment, and the decreasing angle as the drag strip moves at least 50 feet from the embankment, the 10 foot embankment is fast reduced to less than a 2 foot effective embankment. Look at the Math. Another problem will be once the trees and vegetation are stripped from the embankment it will be prone to flood water eating the embankment and also George Miller drive. In the past when the river flooded airport buildings, the embankment protected the road and airport building structures. EIR did not address past flooding that also covered Highway 1, the old drive in theater and prison lands. 40-4

6. The public address loud speakers will also contribute to noise pollution, unlike a football game that are short lived, the 9 AM to 10 PM, every day of the week, will not go away, and sound will carry thru-out the valley. 40-5 The EIR does not address the impact to aircraft landings due to the distraction of the lights, glare and crowd traffic. Only stating that lights will be on poles with some cover. 40-6

7. Traffic estimated in the EIR for a drag race is stated as 1160 vehicles and 2700 people. If you Conclude that this could add 8 cars per block of city traffic, it would equate to an additional 145 blocks of traffic congestion in the city, this is not an insignificant amount, as noted in EIR. Visualize traffic on H, Central, O and V streets blocking up with even 145 additional blocks of traffic congestion, does this sound like an insignificant problem for major streets. 40-7

8. The Sky Dive operation at the airport provides up to 8,000 people that come to Lompoc to participate in clean activities that are conforming and associated with the airport. They have a known positive history, add to the tax base of the city, utilize the motels and restaurants. The Motorsports Park is not in any way a clean, conforming, or associating activity with the airport, and would create impacts with the daily operation of the airport. Problems, such as dust and dirt blowing into, and on the airplanes, distracting lights, and congestion on the access road to the airport. The impacts to the existing landing area for the Sky Dive operation, and even worse the possible loss to Lompoc of a real business, that does not want a free ride using city money. Remember the multiple statements by the Motorsports Park association that the Motorsports Park will not cost the city any money. Although in fact they have already received two checks for over $60, 000 and $70,000 authorized by the City Council. I just learned that the $60,000 check has been paid back to the city. Who knows how much more money the Motorsports Park will want from the city, just to get started, let alone to keep operating. One big question not addressed in the EIR, is how the Motorsports Park that does not have funds to cover initial start-up expenses, will have the funds to mitigate all the problem areas in the EIR, without additional money from the city. The big question for the city Planning and Council, is would they be financing any other commercial development, of any kind, that came with their hand out. In this case we have an ill-funded organization that is pushing an airport non-conforming and controversial project on the city. A much bigger question is how the ill-funded Motorsports Park, will be able to even sustain the park if built, and procure insurance to cover accident and liability. In reading the EIR data, I learned that the Motorsports Park plans to deed back to the city the project at completion. This would create unlimited liability to the city voters for the high risk park activities, as the deep pockets, for law suits of every type. Why would the city fathers 40-8

Page 3

want to subject the Lompoc Valley voters to these potential problems. 40-8

9. The city needs to not only look at the current EIR problems, but also the long term liabilities and cost to the city and its image. Speaking of image, let's discuss Lompoc that has an image of a clean, quiet and peaceful city that has always had the best interest of the citizens at heart. The City Planning and City Council have always vetted future business to ensure that they meet the image of the city. Let's look at Bakersfield, CA one of the few cities in California, that still has a drag strip, that has not been shut-down by noise and pollution law suits. Citizens from numerous California cities have proven in class actions court suites that they do not have to exist with incompatible land use. Bakersfield was smart enough to build the drag strip over 10 miles from the city of Bakersfield. In an area with access to a major freeway, with highway exits that would not que up traffic on city streets, or contribute to city noise and traffic pollution. Maybe Lompoc can learn by the 10 mile separation of non-conforming uses, rather than the current proposed airport location with no separation from airport and 0.3 mile separation from residential and commercial areas. The EIR does not consider the planned housing development of up to 400 hundred additional houses in the Lompoc Y area, just North of the proposed Motorsports Park. They will also be affected by the noise, pollution and problems associated with the Motorsports Park. The EIR did not effectively present the case for another location at least 10 miles from residential and commercial buildings. 40-9

10. The Motorsports Park plans to occupy a major portion of the Zone 6 area to the North side of the runways, that is currently designated as an emergency safety zone for problem landings or take-offs. The Motorsports Park plans to install the major portion of the drag strip and motorcycle park, including non-conforming stadium seating, lights, and other non-conforming modifications, not allowed by the Airport Master Plan. The EIR did not address this impact to the obstructing of the emergency landing area, that could result in major loss of life in an aircraft accident. 40-10

11. The EIR is written to GAME every aspect of reality, with insignificant findings being the answer to most every problem. This is rationalized by producing a basis of estimate based on noise samples not based on facts, incorrectly sampled using natural barriers, like hillsides, buildings, etc. Look at the noise graphs and locate the minimum noise areas selected for most of the readings. They should have been looking for locations that would record the actual PEAK noise levels, and not averaging them. The EIR does not address the fact that the Motorsports Park would not be allowed due to the non-compliance with the 2030 General Plan, noise limits at its property line. The EIR Airport objectives do not address factual statements relative to the impact on the Airport Master Plan, with major distortions of the actual facts relative to impacts on the Airport operation. The real facts are that the Motorsports Park is inconsistent in every way with the Airport and the Lompoc Valley voters. If you now look at all the environmental impacts, coupled with the above, what are the advantages of the Motorsports Park to the Lompoc Valley. The EIR does not address the possible loss in home values, with some estimates up to $30,000, due to the problems created by the Motorsports Park. If the Motorsports Park 40-11

Page 4

project is ever approved and implemented, I estimate that many Lompoc Valley and adjacent residents, may not wish to exist with an incompatible land use in their neighborhoods, that effects their rights, both physical and legal. 40-11

Page 5

ATTACHMENT #1

Estimating Sound Levels With the Inverse Square Law

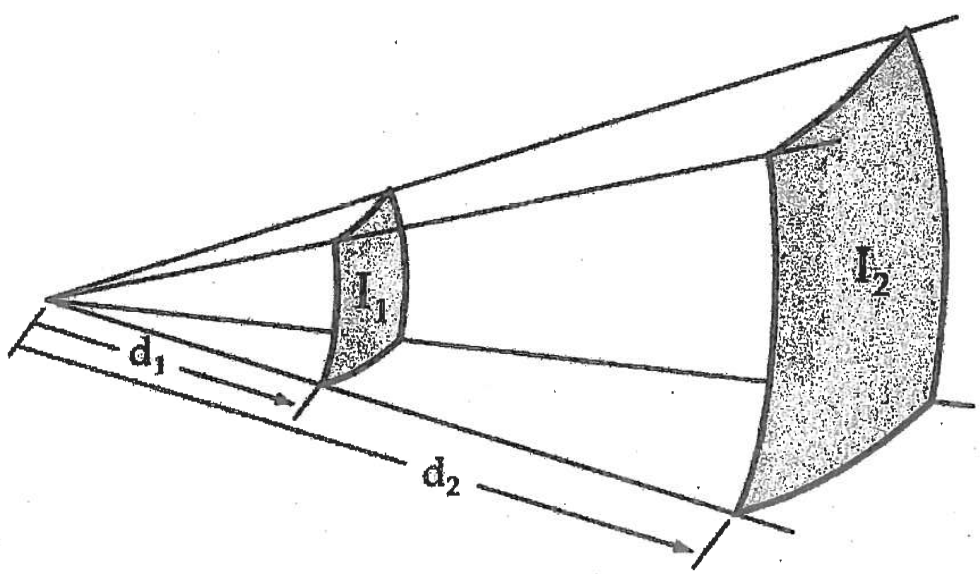
In the real world, the inverse square law is always an idealization because it assumes exactly equal sound propagation in all directions. If there are reflective surfaces in the sound field, then reflected sounds will add to the directed sound and you will get more sound at a field location than the inverse square law predicts. If there are barriers between the source and the point of measurement, you may get less than the inverse square law predicts. Nevertheless, the inverse square law is the logical first estimate of the sound you would get at a distant point in a reasonably open area.

If you measure a sound level I_1 = 127 dB
at distance
d_1 = 3.048 m = 10 ft

$$\frac{I_2}{I_1} = \left[\frac{d_1}{d_2}\right]^2$$

then at distance
d_2 = 804.672 m = 2640 ft

the inverse square law predicts a sound level
I_2 = 78.56792146 dB



You can explore numerically to confirm that doubling the distance drops the intensity by about 6 dB and that 10 times the distance drops the intensity by 20 dB.

Decibel definition | Decibel calculation
Calculating dB for distance ratios

Index
Auditorium acoustics

 ATTACHMENT #2

Estimating Sound Levels With the Inverse Square Law

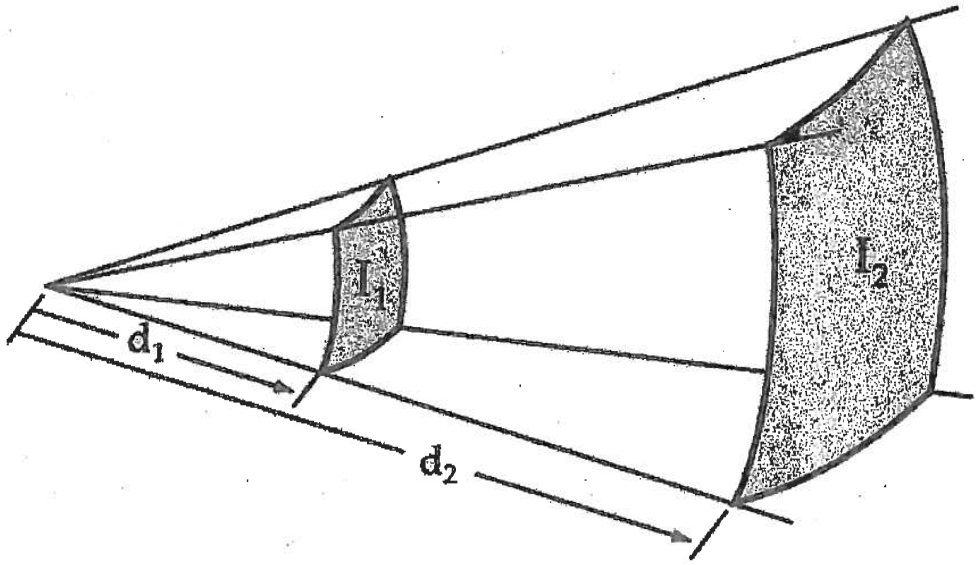
In the real world, the inverse square law is always an idealization because it assumes exactly equal sound propagation in all directions. If there are reflective surfaces in the sound field, then reflected sounds will add to the directed sound and you will get more sound at a field location than the inverse square law predicts. If there are barriers between the source and the point of measurement, you may get less than the inverse square law predicts. Nevertheless, the inverse square law is the logical first estimate of the sound you would get at a distant point in a reasonably open area.

If you measure a sound level I_1 = 127 dB
at distance
d_1 = 3.048 m = 10 ft

$$\frac{I_2}{I_1} = \left[\frac{d_1}{d_2}\right]^2$$

then at distance
d_2 = 482.8032 m = 1584 ft

the inverse square law predicts a sound level
I_2 = 83.00489645 dB



You can explore numerically to confirm that doubling the distance drops the intensity by about 6 dB and that 10 times the distance drops the intensity by 20 dB.

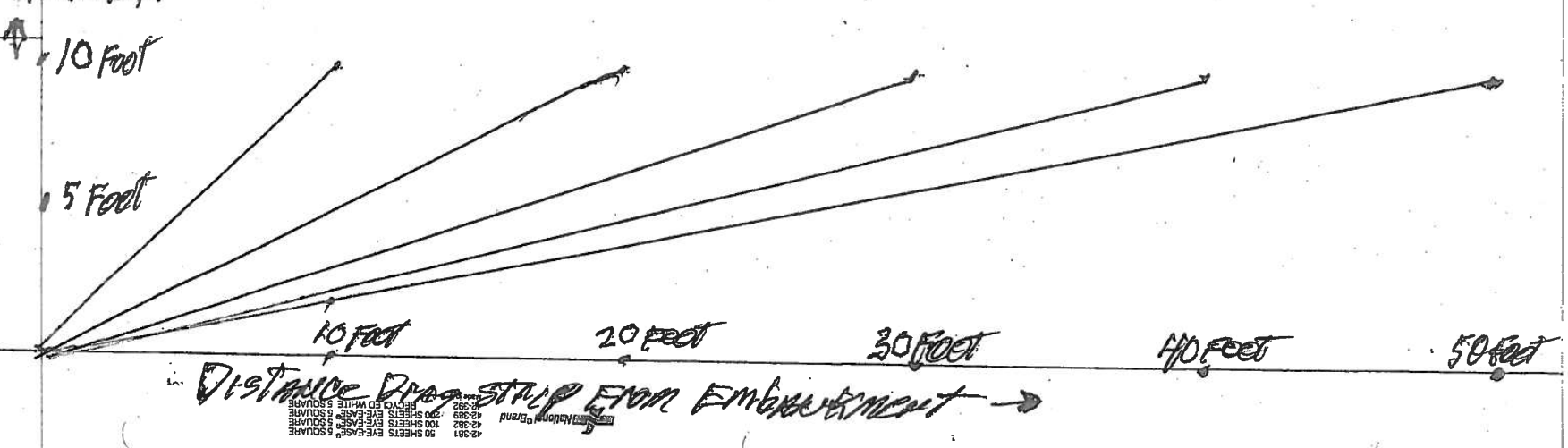
Decibel definition | Decibel calculation
Calculating dB for distance ratios

Index
Auditorium acoustics

Attachment #3

Equivalent of 10 Foot embankment as Drag Strip to embankment distance increases.

Note At 10 Feet distance to embankment you would have 10 Foot equivalent.
At 50 Feet distance to the embankment you would have 2 Foot equivalent.



Letter No. 40: Donald C. Edward, Systems Engineer, August 10, 2016

Response 40-1

The Draft EIR evaluated potential impacts related to noise, air quality, land use, aesthetics, traffic, etc., that may significantly affect the nearby residents and their quality of life. The Draft EIR's impact analyses either resulted in less than significant impacts or devised mitigation measures to reduce impacts to a level of less than significant.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 40-2

Please refer to Response 17-1 and Topical Response 7, Noise, for a discussion of the methodology used and consistency to the applicable policies contained within the City's General Plan Noise Element.

As noted in Topical Response 7, Noise, real-time noise was collected and used in the noise analysis. As noted in Response 17-1, impacts from noise resulting from operation of the Motorsports Park would be less than significant.

It was determined that based on an increases of less than 3 dB(A), noise during the operational phase would result in a less than significant impact. Based on the findings, the Project would be consistent with Policies 1.1, 1.2, 2.1, 2.3, and 2.4 of the Noise Element.

Impacts associated with dust (PM10 and PM2.5) would be mitigated to less than significant.

As discussed in the Draft EIR, the proposed Project particulate emissions would exceed the local significance thresholds for particulate matter (8 $\mu g/m^3$). In accordance with **Mitigation Measure MM 4.2-1,** a Fugitive Dust Control Plan would be implemented that would require application of a water amendment with a minimum 84 percent control efficiency and would also require the V Street access road be paved. **Mitigation Measure MM 4.3-2** would require limitations as to the operation of the OHV component of the proposed Project.

Emissions of VOC and NOx associated with the proposed Project would result from vehicle traffic, with the overwhelming majority of those emissions coming from passenger vehicles. The level of emissions generated for a single day would remain above the daily mass significance thresholds for NOx and VOC adopted by SBCAPCD. Impacts would be significant and unavoidable under these thresholds.

The City Council would be required to adopt a Statement of Overriding Considerations with regard to this impact should the City Council decide to approve the proposed Project.

Response 40-4

As noted in the Draft EIR, Section 4.8, Hydrology, (see page 4.8-2), the Federal Emergency Management Agency (FEMA) defines a floodplain as the area of land adjacent to the water course that may be submerged by flood water during a 100-year storm. The City's designated floodplain areas are shown on **Figure 4.8-1, FEMA-Designated Floodplain Areas.** The proposed Project site is currently located within FEMA's 100-year floodplain area.

The Draft EIR (see pages 4.8-20) states the proposed Project would include recreational amenities such as several Off Highway Vehicle (OHV) riding areas and a one-eighth-mile drag strip. However, as previously discussed, the proposed Project would include a stormwater drainage system that would allow water to be captured on site, and would not result in any localized flooding hazards. Impacts would be less than significant.

Response 40-5

As discussed in Section 4.10 of the Draft EIR (page 4.10-28), other stationary noise sources were evaluated by identifying noise levels from stationary sources such as noises from pedestrians and a public address (PA) system. Noise during those events is highly variable and dependent on the type and level of activity within the proposed Project site. The Draft EIR (page 4.10-28) notes from observations and measurements at similar facilities and events, the following assumptions were made:

- PA systems can create higher sound levels than typical crowd reactions. PA noise (commentary, announcements, etc.) occurs far more often than crowd cheers. However, a typical motorsports park event would not likely use the PA system for more than just spoken content. As such, impacts from the PA system would be minimal and have been incorporated into the analysis.

- Cheering is highly variable, depending on the particular moment-to-moment activity.

Overall, those sources are part of the traffic and operation noise source and as such contribute to the overall noise emanating from the proposed Project.

As discussed in the Section 4.10 of the Draft EIR, the highest increases occurred during the Drag Strip/OHV Trail Ride Area scenario, with exterior noise levels increased by 2.2 dB(A) at nearby sensitive receptors when compared to the existing noise levels. It was determined that based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact.

Response 40-6

Section 4.1, Aesthetics, of the Draft EIR provides a discussion of the impacts associated with lighting, including requirements with FAA requirements.

Light intensity along the drag strip would be about 10 to 50 foot-candles (fc) and light intensity just beyond the drag strip would be about 1 to 10 fc. Light emitted beyond the proposed Project site's boundaries would only reach a maximum of 0 to 1 fcs. As noted in the Draft EIR, Section 17.068.030 of the Lompoc Municipal Code requires a development plan for the proposed Project. As discussed, lighting would be provided in the OHV area for evening and nighttime activities via a portable system. Lights would be shielded and focused downward to meet FAA standards; the fixed light towers would also have aircraft warning lights atop each pole as required by **Mitigation Measure 4.9-1.** Security lighting would also be provided in the pit area, near the west end of the drag strip, in the grandstand area, in the OHV area east of the oval track, and in the central parking area. However, light emitted by on-site usage would not be substantially projected off the Project site and would be confined to the internal boundaries of the proposed Project.

Response 40-7

Section 4.13, Traffic and Circulation, of the Draft EIR provides an analysis of potential impacts related traffic. As noted, the following six study intersections were selected for analysis:

- SR 1 / Purisma Road / Harris Grade Road
- Central Avenue / V Street
- Central Avenue / West Barton Avenue
- Central Avenue / O Street
- Central Avenue / L Street
- Central Avenue / H Street

The Draft EIR determined, during weekdays the study area intersections are forecast to continue to operate at the same LOS as existing conditions under Existing plus Project conditions. The Draft EIR determined ll of the six study area intersections for the weekend peak hour would continue to operate at LOS C or better under Existing plus Project conditions. Impacts would be less than significant.

Response 40-8

Please refer to Response 14-1 and Topical Response 8 regarding Skydive Santa Barbara (SDSB).

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 40-9

Please refer to Topical Response 1 regarding Airport safety and Topical Response 5, Land Use Compatibility.

Response 40-10

Please refer to Response 35- 4 and Topical Response 1 regarding Airport safety.

Response 40-11

Please refer to Response 13-1, Response 17-1 and Topical Response 7 for a full discussion on consistency to the applicable policies contained within the City's General Plan Noise Element. Please also see Response 40-8.

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AUG 10 2016

Planning Division

Date: August 10, 2016

To: Lucille Breese, Planning Manager, City of Lompoc, CA

From: Terry Hammons

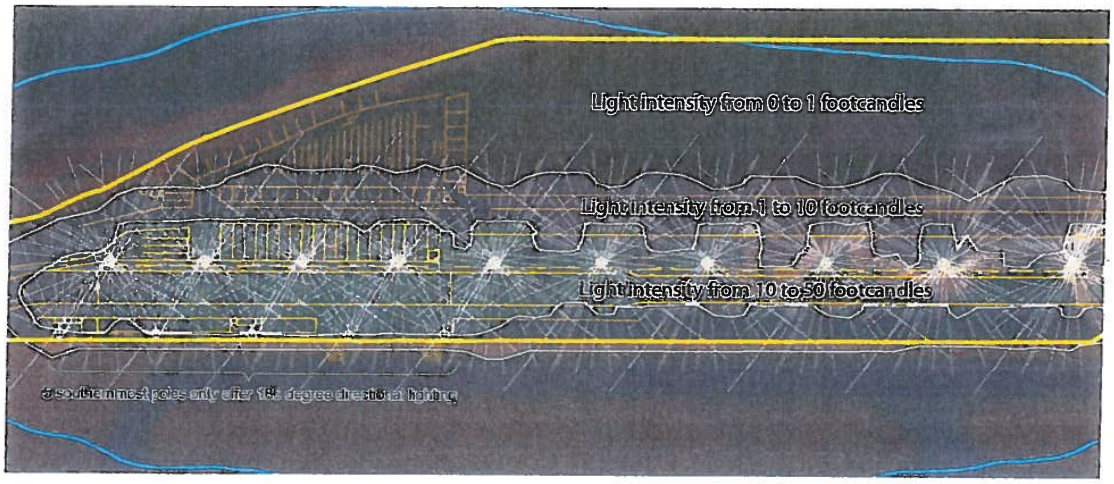
Subject: Comments to Draft Environmental Impact Report - Motorsports Park Project

Aesthetics

Impact from Lighting:

"light emitted by on-site usage would not be substantially projected off the proposed Project site and would be confined to the internal boundaries of the proposed Project."

This is a questionable finding. The lighting proposed could be a hazard to pilots at night. This lighting may be annoyance neighborhoods, commercial areas, and surrounding areas well beyond the park. This image is taken from the Draft EIR. It illustrates the projection of light from the proposed park.



41-1

It is the assumption in the Draft EIR that the light would be contained on site, but there is no sampling or evidence of that in the report. This statement from the Draft EIR is suspiciously conflicting "However, light emitted by on-site usage <u>would not be substantially projected off the Project site</u> and would be confined to the internal boundaries of the proposed Project." It is then further stated, "Sources of glare would include vehicles traveling to the proposed Project site and from the permanent maintenance and storage building and temporary structures." Both of these statements do not provide assurance the lighting of this project will <u>not</u> be a disturbance and an annoyance to the surrounding area.

This is addressed further in Land Use and Planning.

Air Quality

The proposed Project would employ up to 40 employees by 2020, which would account for less than 1 percent of the projected growth in the region and would fall within the projected growth in the City between 2008 and 2020. Furthermore, the proposed Project would permit similar recreational uses as those currently permitted by existing zoning for the proposed Project site. The proposed Project would also be consistent with the City's General Plan Conservation Element goals and policies to minimize air quality impacts resulting from construction and development activities regulated by the City using current recommendations from SBCAPCD conditions and implementing the City's grading ordinance; the proposed Project would minimize vehicle-related air quality impacts; and would remain consistent with draft framework thresholds for per service population emissions. Accordingly, the proposed Project would be consistent with the employment projections within the 2013 Clean Air Plan (CAP) and the 2012 Regional Growth Forecast and impacts would be less than significant.

This statement has not been vetted in any analysis by the City, or third party as to a marketing analysis and/or a business valuation. Where in any independent report is there an analysis of the revenue, employment, and other economic benefits this project will provide to the community? The findings in Air Quality will diminish the revenues from this project by limiting the use of off highway riding areas. 41-2

4.2-1

A Fugitive Dust Control Plan shall be prepared and submitted to the City of Lompoc and Santa Barbara County Air Pollution Control District (SBAPCD) for review and approval, before operation of the proposed motorsports park facility. The Fugitive Dust Control Plan shall be implemented and shall include measures to control emissions of airborne particulate matter associated with onsite off-highway vehicle (OHV) and drag strip activities sufficient to ensure particulate matter is below the 8 ug/m^3 threshold. Measures to be included in the Fugitive Dust Control plan to control operational emissions shall include, but are not limited to, the following:

-Onsite access roads extending from George Millar Drive and V Street shall be paved.

-The Open Riding and Trail area shall be limited to 14 OHVs per hour.

-All ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent.

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This impact will cause areas in and around the project to have serious issues with air quality. It will also have a financial impact that will effect the benefit to the airport - an enterprise of the City of Lompoc, neighborhoods and commercial areas. 41-2

4.2-1

The motorsports operator shall limit the number of OHV vehicles, OHV races, and length of OHV events based on the anticipated weekend events for concurrent operation of the Oval Cart Track and Stadium Cross events in accordance with the following requirements:

-Restrict the operation of the oval cart track events to 2 races per hour for 6 hours each weekend day.

-Restrict the operation of stadium cross events to 2 races per hour for 6 hours each weekend day.

These restrictions will have a negative effect on the financial benefit to airport and conflicts with the Business Plan the Foundation submitted to the city.

4.2-3

When the Oval Cart Track and Stadium Cross events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Enduro Cross event in accordance with the following requirement: 41-3

-Restrict the endurocross track events to 2 races per hour for 6 hours each weekend day.

This will have a negative effect to the financial benefit to the airport and conflicts with the Business Plan of the Foundation submitted to the city May 23, 2012:

Lompoc Valley Motorsports Park Project
A Sub-Committee of the Lompoc Parks, Recreation, and Pool Foundation Inc.

Off Road Event Income Year One

COURSE OPERATIONS - On a per/event basis

ASSUMPTIONS
- Based on 40 annual events
- Based on 40 vehicles/riders per event (w/6% growth)
- Based on an average of 80 crewmen/spectators per event (w/7% growth)
- Based on an in-house ambulance w/ track EMTs
- Insurance (apportioned)
- Phone bill (apportioned)

INCOME	Year 1	Year 2	Year 3	Year 4	Year 5
40 Entries @ $32 each (w/ 6% growth)	$1,280	$1,357	$1,438	$1,525	$1,616
80 Crewmen/Spectators @ $12 each (w/ 7% growth)	$960	$1,027	$1,099	$1,176	$1,258
Concessions/Souvenir (Net) (w/ 7% growth)	$300	$321	$343	$368	$393
Event Operating Income	$2,540	$2,705	$2,880	$3,069	$3,267
Less Operating Expenses	$530	$545	$560	$577	$595
Total Per Event Profit	$2,010	$2,160	$2,320	$2,492	$2,672
X Events	4	6	6	6	6
Annual Income	$8,040	$12,960	$13,920	$14,952	$16,032

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4.2-4

When the Oval Cart Track and Stadium Cross events or the Enduro Cross Only events are not in operation, the motorsports operator shall limit the number of OHV vehicles, OHV races, and OHV events based on the anticipated weekend events for only the Motor Cross event in accordance with the following requirement:

-Restrict motorcross events to 18 vehicles with 1 race per hour for 3 hours each weekend day. 41-3

This will have a negative effect to the financial benefit to the airport.

These are the proposed mitigations to Air Quality:

Significant and unavoidable for VOC and NOx.

Because of this finding, this makes this project questionable for financial feasibility and viability.

Biological Resources

4.3-1

To offset impacts to AWT (Arroyo Willow Thicket) on site (14.5 acres), off-site mitigation will be implemented at a 5 to 1 ratio for a total of 72.5 acres (14.5 acres of impacted AWT at a 5 to 1 ratio equals 72.5 acres). That acreage includes 0.5 acres of AWT that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted, the mitigation for the Runway Expansion Project was not successful, so no credit is given for that mitigation.4 41-4

Mitigation may be conducted adjacent to the proposed Project in remaining AWT, and/or at appropriate off-site properties. If off-site locations are considered, then they should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River.

Mitigation shall be provided for through the development of a Restoration and Mitigation Plan (Plan). The Plan will compare the performance of the mitigation area against the recommended performance criteria to identify any shortcomings or problems in the mitigation area. The Plan will include methods for evaluation of plant establishment, vigor, and health, and for evaluating the percent cover by native and non-native plant species. In addition, the Plan will include specific details on a planting palette invasive species removal and methods for planting and irrigation. The following is a preliminary conceptual planting palette and schedule of success criteria. The planting palette and success criteria may change and will be adapted to site specific conditions when a final off-site mitigation area is selected. The Plan should provide for quarterly

monitoring visits during the first year, biannual visits during the second and third years, and annual visits during the fourth and fifth years.

The Plan will be developed in consultation with City of Lompoc and submitted to the CDFW for review and concurrence at least 30 days prior to beginning construction. (The planting palette is described in the Draft EIR, page 2.0-18 through 2.0-20) 41-4

The land area for this mitigation needs be in ownership by the City of Lompoc before any construction begins. This will assure full environmental compliance with regard to the land area requirement. However, will this mitigation require an Environmental Impact Report?

4.3-7

Proposed Project construction activities within CDFW jurisdiction (AWT) will require a Lake and Streambed Alteration Agreement (SAA) pursuant to Section 1602. An SAA will be obtained from CDFW (South Coast Region) prior to proposed Project implementation, and may be require mitigation. 41-5

The Lake and Streambed Alteration Agreement will need to be requirement before any construction begins.

Project Impact:

The Santa Ynez River is a direct tributary to the Pacific Ocean and is considered non-wetland Waters of the U.S.; however, its streambed is within CDFW jurisdiction. Therefore, the 14.5 acres of AWT is considered a riparian habitat associated with the Santa Ynez River and is under the jurisdiction of the CDFW pursuant to Section 1602 of the Fish and Game Code. Therefore, impacts would be potentially significant.

The proposed Project is designed such that surface water runoff will be directed into two infiltration basins on site that extend along the drag strip and return road. All surface water runoff would be captured in these two areas with no runoff drainage into the Santa Ynez River. Therefore, potential indirect impacts surface water runoff within the Santa Ynez River watershed would be less than significant. 41-6

The proposed Project is designed such that surface water runoff will be directed into two infiltration basins on site that extend along the drag strip and return road. All surface water runoff would be captured in these two areas with no runoff drainage into the Santa Ynez River. Therefore, potential indirect impacts surface water runoff within the Santa Ynez River watershed would be less than significant.

This is the proposed mitigations to capture Stormwater runoff:

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Surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road, as illustrated in Figure 3.0-11. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River. Those areas include:

- Infiltration Area A would cover an area approximately 44,300-square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet (cu. ft.) of stormwater.

41-6

-Area B would be approximately 34,500-square feet in size, with an average depth of 3.6-inches, and would contain approximately 10,270-cu. ft. of stormwater.
Together, those areas would provide a total of approximately 13,830 cu. ft. of stormwater capture.

This proposed mitigation is wholly inefficient to capture runoff and would not serve as a percolation system for the park area. Note the depths of each basin, one inch (1) and three and one half (3 1/2) inches respective. It is suggested that if the park is approved for construction there be drainage, retention and water systems designed and constructed that would retain all runoff to prevent drainage into the river. And, should the park be approved, a study, a project plan and construction plans should required to have all drainage from the Airport comply with current regulations and laws for stormwater retention.

Cultural Resources:

There is a likelihood of Chumash or other archeological remains in this area of the project. Because of this likelihood, there should be an Archeologist on-site during all stages of the construction. Despite the Draft EIR, the Chumash Tribe are believed to have inhabited all areas along the river, valleys and coastline of of Central California.

41-7

Geology and Soils

Page 2.0-29

"The proposed Project site consists of an abandoned industrial site that includes dirt roads, former building slabs, debris from prior uses, ...and potentially up to four underground storage tanks (USTs). Given that construction would involve removal of vegetation and grading of the site, soil would be exposed and could be subject to erosion, especially during times of heavy rainfall or high winds.

41-8

A subsurface geological survey should be required. The UST's need to be investigated to remove any doubt of what they may contain because of possible disturbance to the area during construction and operation of the park.

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Surface water runoff would be directed to two infiltration basins extending on either side of the proposed drag strip and return road, as illustrated in Figure 3.0-11, Conceptual Grading Plan. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River. Those areas include:

41-8

-Infiltration Area A would cover an area approximately 44,300-square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet of stormwater.

-Area B would be approximately 34,500-square feet in size, with an average depth of 3.6-inches, and would contain approximately 10,270-cubic feet of stormwater.

A General Permit for Storm Water Discharges Associated with Construction Activities is required because the proposed Project would occur over an area greater than 1 acre. The applicant must also develop and implement a Storm Water Pollution Prevention Plan (SWPPP) that would employ Best Management Practices (BMPs) to prevent both the erosion of on-site soils and the discharge off-site of on-site soils. Furthermore, the Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application.

41-9

These requirements need to be in place before any construction begins for the entire project - Off Highway Vehicle Area and Drag Strip. <u>There should be no separation of the areas of this project with regard to environmental impacts.</u> The developer of this park has proposed phasing of construction, <u>but that should not include phasing of the environmental requirements</u>.

Operational features such as watered OHV tracks and a paved drag strip would also prevent erosion and control dust. Therefore, as a result of adherence to Lompoc Municipal Code for sediment and erosion control and SBCAPCD Rule 345, soil erosion impacts would be less than significant.

The "watering" of the OHV area is in conflict with the state, county and city policy for water conservation. Although not addressed in this study, rate payers in the city have had increases for the last three years for water and wastewater. There is an additional two more years these rate increases. To use water for dust control on a project that has not been determined to be feasible or viable is not good planning.

41-10

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The proposal above is questionable. The depths of each basin does appear to be adequate for retention and it is likely these basins will not prevent flooding into the river area. These basins are planned for construction in the floodplain, This needs further analysis. 41-10

The proposed Project site is comprised of soils with alluvial deposits, making it susceptible to seismically induced settlement. Additionally, since groundwater depths were found to be as shallow as 29 feet bgs on the proposed Project site, the potential for ground collapse and other adverse effects due to subsidence is considered potentially significant. 41-11

The developer has proposed to install used donated bleachers. Will these bleachers be assessed for safety and use in this potential "seismic area."

Greenhouse Gas Emission

The proposed Project would incorporate measures that reduce GHG emissions. The proposed Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of the proposed Project's life-cycle. These designs would increase the structures energy efficiency, water efficiency, and overall sustainability. Because the proposed Project achieves an efficient service population target, the proposed Project would be consistent with the 2035 reduction in GHG emissions from 1990 levels set forth in the 2008 Scoping Plan and 2014 Updated Scoping Plan. Therefore, impacts would be less than significant. 41-12

This statement, "The proposed Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of the proposed Project's life-cycle," is in conflict with conservation of emissions and water. This project will add more vehicle emissions and not conserve water. Note Air Quality finding - water would be used for dust control.

Hazards and Hazardous Waste

Construction activities for the proposed Project would involve the transportation of hazardous substances that would be used on site such as paints, solvents, cleaners, cements, glues, and fuels. In addition, the Project operation would store and utilize hazardous materials on site such as fuels, oils, solvents, and other materials. Proposed Project site participants, spectators, and employees can potentially be exposed to such hazardous materials as a result of accidents or improper use. A variety of state and federal laws govern the generation, treatment, and/or disposal of hazardous wastes. Construction and operation of the proposed Project would not result in significant impacts in relation to exposure of hazardous materials in compliance with such regulatory measures. 41-13

This project places hazards in the area of the Santa Ynez River. The potential of contamination is greatly increased because of the amount of hazardous material that will brought in, used on site, the number of people being exposed to these materials and acknowledged in the EIR with this statement: "Further, the transportation of hazardous materials to and from the site may

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potentially impact proposed Project site visitors and residents located along roadways used for delivery." 41-13

The proposed Project site does not contain any known USTs, <u>however, grading and excavation of the site may uncover any unknown USTs. Therefore, impacts to the release of hazardous materials would be potentially significant.</u>

The above is cautionary with the findings contained in JHA's Environmental Inc.'s report. This is stated on page 11 of that report:

5.0 DISCUSSION OF MITIGATION MEASURES

A subsurface geophysical survey could be undertaken near suspected locations of historic USTs and particularly in the area of the 3-inch-diameter pipes. If anomalies are identified, the soil over the anomaly should be carefully excavated to determine the exact nature of the anomaly. If a UST is confirmed, a permit to remove the UST should be acquired from the County of Santa Barbara Heath Department that will include the collection of soil samples from beneath the UST for laboratory analyses. If a release of petroleum hydrocarbons is confirmed, soil assessment and remediation would be undertaken with oversight from the regulatory agency. 41-14

If no UST is identified on the Site at a minimum a Soil Management Plan (SMP) should be prepared. The SMP would describe the methods to be implemented to protect the health and safety of the construction workers working on the Proposed Project and the health and safety of the general public during the proposed on-Site soil grading/excavation activities required for the Proposed Project. The SMP would provide the methodology for the grading contractor to deal with any suspect subsurface structures, debris, stained, or odiferous soil that might be encountered and that could represent a hazard to the workers or the public.

PHOTOGRAPH 5 – View looking north at two 3-inch-diameter pipe extending from the ground inside the dirt road loop on the south side of the main dirt road in the general area of the reported former asphalt batch plant. These two pipes and the ones nearby shown in Photograph 6 (below) are reportedly associated with an underground storage tank; however, no evidence of a UST was observed in the area.

PHOTOGRAPH 6 – View looking at the second set of 3-inch-diameter streel pipes extending from the ground. The four pipes are not typical of those associated with a gasoline or diesel fuel UST.

41-14

Hydrology Water Quality

In that this project is planned for construction in the "floodplain," will this be permitted by those agencies that have regulatory authority of land and water in the area of the Santa Ynez River. i.e. requirements for Lake and Streambed Alteration Agreement, permits for detention/retention basins and other required permits? (see Project Impacts)

These are noted in the Project Impacts:

Compliance with the appropriate National Pollution Discharge Elimination System (NPDES) requirements, implementation of a Storm Water Pollution Prevention Plan (SWPPP) with BMPs or the submittal of an Erosion Sediment Control Plan would reduce potential water quality impacts to less than significant.

41-15

As stated above, the depth of the proposed retention basins will not be sufficient to assure no runoff from the project site. The depth of one (1) inch and three and one half (3 1/2) is questionable in retention capacity and in the event of a flood this could potentially allow hazardous materials to leak and runoff into the river area as well as exacerbating flooding.

This image from the Draft EIR illustrates the area of 100 year floodplain.

The project site is completely within the 100 year floodplain. By encroaching into the floodplain, without constructing other protections, this may cause further erosion and flooding in the site, near and down river from the project site. Consequently, this study needs to address flooding and

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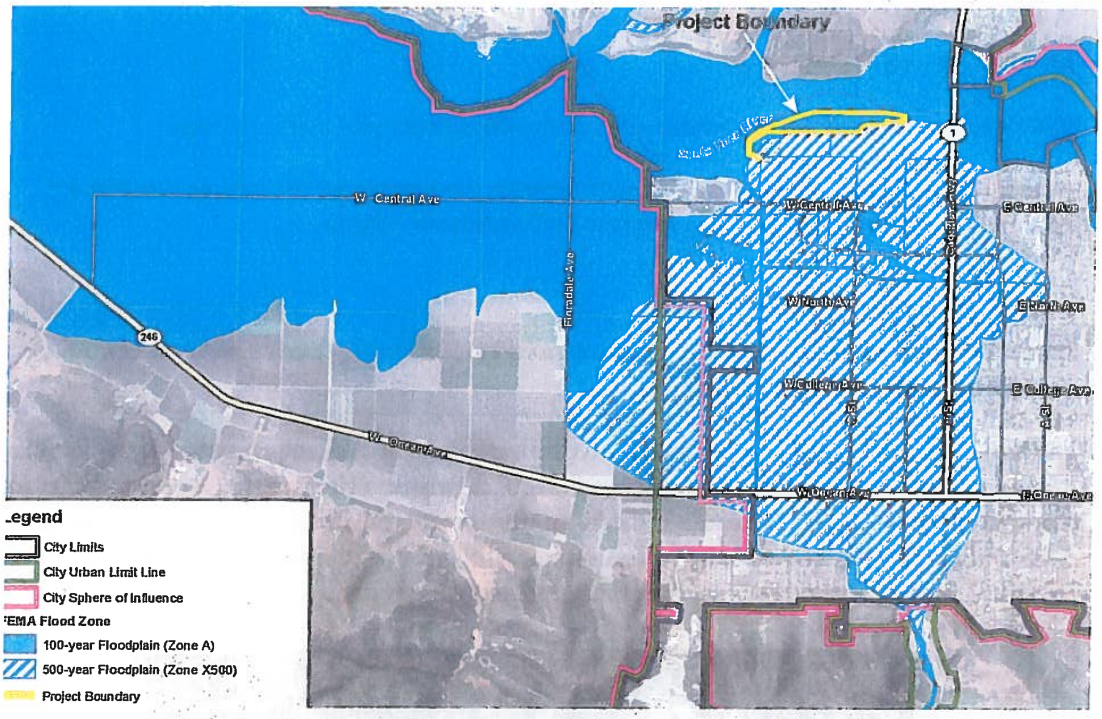

41-15

protections that may need to be constructed beyond the project site to prevent further damage to the river. (Reference Santa Ynez River Bank Protection Evaluation, City of Lompoc, January 20, 2011)

This is mentioned in the Notice of Preparation comment letter from the Environmental Defense Center, January 11, 2016, page 11:

D. Effectiveness of Sediment/Detention Basins located on Potential Floodplain

The site is "within an existing FEMA-designated flood inundation area."[45] The EIR should therefore evaluate and disclose whether the Project site is located in a floodplain or floodway and whether this makes a storm water detention basin less effective at mitigating runoff and water quality impacts. If a storm water basin is required to mitigate water quality or runoff impacts, the EIR should disclose any effects of such a basin, and should evaluate whether the Project configuration allows space for a basin to substantially lessen potentially significant water pollution impacts.

This EIR study needs to address issues in the final report "An Assessment of Potential Restoration Actions to Enhance the Ecological Functions of the Lower Santa Ynez River Estuary" with regard to the aggregate impacts the Motorsports Park will have on the lower area of the river. This study has not addressed those impacts.

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Land Use and Planning

These are the stated mitigations:

4.9-1 *Prior to the issuance of building a grading permits the site developer shall:*

-Restrict the height of the lighting standard including any overhang such as light shielding, fixtures, etc. such that they do not penetrate the Transitional Surface;

or

Submit all structures to the FAA for an obstruction evaluation (OE) and comply with all FAA requirements resulting from the OE.

The lighting at night will be a disturbance to the immediate area of the proposed park as well as neighborhoods, particularly those to the northeast, La Purisima Highlands. The beacon light has had to be adjusted in the past because the beam was directly into the homes on the perimeter of the development. The proposed lights for the park will have to be highly illuminative to be effective for the the park, but very disturbing and annoying to those outside of the park area. 41-16

This is a night shot taken at 11:59pm. It clearly demonstrates the illumination and potential annoyance lighting may have on the surrounding area of this proposed project.

Because there has been no sampling of the lights, there needs to be a study and sampling in the proposed project area to determine disturbance and effectiveness.

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4.9-2 *Prior to the use of V Street access way, the developer shall construct a height-restricting barrier over the entry-way to the proposed Project site's access point on "V" Street and the Approach/Departure Surface are such that it restricts access to vehicles to more than 12 and 1/2 feet including antennas, roof racks and roof top carriers.*

As a secondary option to the height-restricting barrier, the Project applicant shall lower the V Street access elevation to 15.5 feet below the existing elevation of the Approach/Departure Surface such that vehicles less than 22.5 feet including antennas, roof racks, and roof top carriers will not penetrate the Approach/Departure Surface.

41-17

Because travel trailers, recreational vehicles and semi trucks with trailers have an average height of 10 feet or more without air conditioners, roof racks, roof top carriers, and other roof top accessories, the height limitation may well require the second option to assure all vehicles can access that area of V Street.

4.9-3 *As part of the Conditional Use Permit process, the City, as the operator of the airport, shall develop and implement an educational program to inform airport users, including pilots and skydivers, of activities on the motorsport park site.*

41-18

This needs to be addressed in the Final EIR as to how this educational program will be implemented.

4.9-4 *The applicant shall either:*

-Eliminate the proposed sky diving drop zone (DZ) area on the western end of Runway 7/25

or

-Identify an alternative location for use as a DZ outside of any FAA restrictive use zones (i.e, Approach/Departure or Transitional Zones) for the proposed DZ area on the western end of Runway 7/25

41-19

or

-For any DZ located with a designated FAA restrictive use area, the City shall submit a request to FAA for review and approval of such use and incorporation into the Airport Layout Plan (ALP) prior to implementation.

These options disrupt the operation of a very profitable business, Santa Barbara Skydive, at the airport. This project has not been determined to feasible or viable and without those determinations vetted by a reputable third party, any determinations effecting SB Skydive drop zone should not be considered until vetting of Motorsports Park with regard to their financial feasibility and viability.

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4.9-6 *Prior to operation of the proposed Project, the applicant shall coordinate with Skydive Santa Barbara to:*

Restrict the skydive lower bench DZ operation times to occur only when OHV and drag racing events are not in session on weekends

41-20

This is an unreasonable condition to put on a business that has a legitimate right to operate at the airport. SB Skydive is aeronautically compliant with FAA, supports a city airport enterprise, is profitable and with restrictions imposed by an non aeronautical project - Motorsports Park, it would force the owner to consider moving that business to another airport. The issue has significant impacts to the owner of the skydive business and to the city. It is questionable the Motorsports Park project is a viable/feasible benefit the airport.

This statement appears on page 2.0-44:

The proposed Project site is not within the purview of any habitat conservation plan or natural community conservation plan, nor would the Project affect any area so designated, directly or indirectly. Implementation of the Project would not conflict with the provisions of any adopted conservation plan.

The above statement is not wholly true. This is taken from an Executive Summary, Audubon California, June 30, 2011:

41-21

In 2009, Audubon California retained ESA/Philip Williams and Associates to conduct a study on the hydrology of the estuary and lower floodplain and provide advice on the feasibility of restoration actions. Audubon California recently completed a report, with funds primarily provided by the California Coastal Conservancy, on an assessment of potential restoration actions on the Lower Santa Ynez River. VMFB staff provided substantial in-kind support for mapping, data collection, and historic research. Other project funders included The Nature Conservancy, California Department of Fish and Game, and US Fish and Wildlife Service.

Project partners included PRBO Conservation Science, who conducted avian studies to further our understanding of how various species utilize the estuary's habitats, and the Central Coast Regional Water Quality Control Board and Cachuma Operations and Maintenance Board, who contributed field data and equipment. As part of this effort, Audubon also initiated a stakeholder process to provide a forum for discussion of restoration opportunities among agencies, landowners and other key community members in a broader visioning process.

Our final report documents historic changes in land use, hydrology and lagoon functioning within the Lower Santa Ynez River Estuary. This analysis included an initial assessment of climate change impacts. Finally we identified a suite of potential restoration actions, provided initial cost estimates, and outlined additional work needed to implement some of these restoration strategies.

Before there is approval for this project, a full assessment should be done to determine the impacts and consequences this project will have on the areas of the river described in the Executive Summary.

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Noise

Operation

This text in italic is taken from the Draft EIR. It describes the areas of the noise test, the varying levels of the test, but it does not identify the types of gasoline engines tested, the size of the engines and whether those engines were open or closed exhaust. Mr. Jason Osborne provides a contrasting opinion of the test.

The maximum noise level increases along roadways adjacent to residential, commercial, and industrial uses by proposed Project traffic would range from a low of 0.0 dB(A) (several locations throughout the vicinity of the proposed Project area) to a high of 13.7 dB(A) (along V Street, north of Central Avenue). The roadway noise levels along V Street, north of Central Avenue, would be 58.7 dB(A) CNEL and would fall below the 65 dB(A) exterior noise level standard identified for community facilities and below the 75 dB(A) exterior noise level standard identified for manufacturing uses in the General Plan Noise Element. Therefore, the proposed Project would not add traffic to these roadways that would exceed the City's exterior standard.

The maximum noise level increase along roadways adjacent to residential uses by proposed Project traffic would be 2.0 dB(A) along Central Avenue, both east and west of Barton Avenue. Noise level increases along roadway segment would be less than 3 dB(A) CNEL. 41-22

Given the existing level of traffic noise along area roadways, up to 67.4 dB(A), and aircraft noise generated by the airport with up to 60- 65 dB(A), parking lot noise would not likely be audible due to the masking of noise by traffic.

Pedestrian noise impacts are considered less than significant due to the distance of sensitive uses (0.3 miles away) and the existing ambient noise levels which range from 60 to 65 dB(A). These sources would not individually exceed the overall noise emanating from the proposed Project site.

The drag strip racing and OHV trail ride area would result in an increase in ambient noise measurements up to 2.2 dB(A). As previously discussed, changes in a noise level of less than 3 dB(A) are noticed by the human ear, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound volume. Overall, the noise generated by the proposed Drag Strip and OVH Trail Ride Area would be similar to existing conditions, with exterior noise levels ranging from 50.0 dB(A) to 72.9 dB(A).

Mr. Jason Osborne, on July 18, 2016, presented a critique of the Noise study. His summary was: "The noise study appears to have been conducted in a way that was meant to falsely reduce the effect of the operational noise of the Motorsports Park, thereby making the DEIR claims of "no mitigation necessary" patently false."

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Mr. Osborne stated these as conflicts with the Noise study:

-The first and most significant conflict that was apparently ignored in the DEIR, is that the City of Lompoc's 2030 General Plan noise ordinance states quite clearly that the noise generated at a property must meet the defined noise limits **at the noise source property line.**

-policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards."

Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."

Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."

41-22

The maximum acceptable noise levels for any source are outlined in Table N-1 as seen below.

Table N-1
Interior and Exterior Noise Standards

Land Use Categories		Ldn	
Categories	Uses	Interior1	Exterior2
Residential	Single Family, Duplex, Multi-Family, Mobile Home	45[3]	60[4]
Commercial & Industrial	Retail, Restaurant	55	65
	Motel/Hotel	45	60[4]
	Professional Offices, Movie Theater, Auditorium	45	65
	Manufacturing, Utilities, Warehousing, Agriculture	65	75
Community Facility	Hospital, School, Nursing Home, Church, Library, Civic Offices, Parks	45	65
Open Space	Passive Outdoor Recreation	--	60[4]

Notes
1. Interior areas exclude bathrooms, closets, and corridors.
2. Exterior areas are limited to the following: private yards or patios of residential uses; restaurant patios; motel recreation areas; office, theater, or hospital patios or assembly areas; school playgrounds; nursing home, library, or civic office assembly areas; and park picnic areas.
3. If achievement of the interior noise standards requires that windows and doors remain closed, air conditioning or mechanical ventilation is required.
4. In areas affected by aircraft noise, the standard is 65 Ldn with the stipulation that the noise level exclusive of the aircraft-generated noise cannot exceed 60 Ldn.

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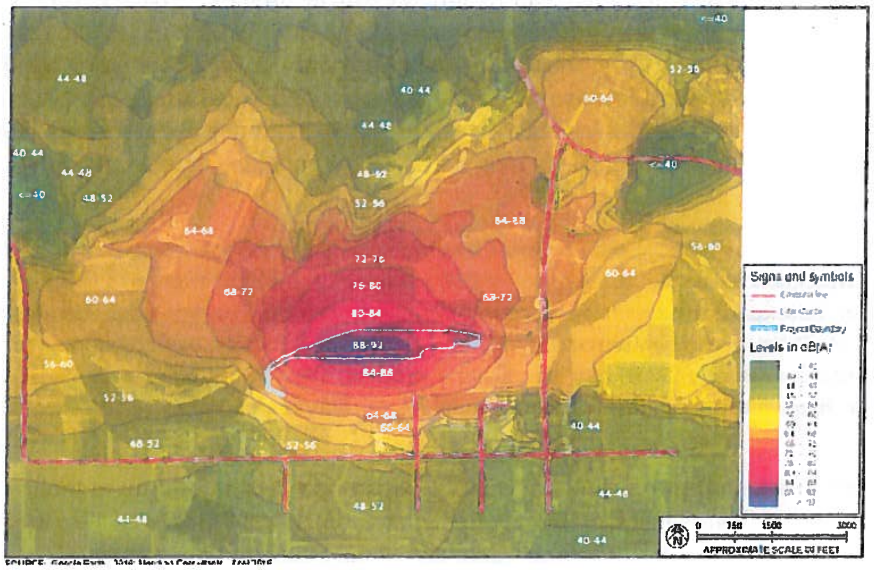
As can an be seen from one of the sound pressure level simulations contained in the DEIR shown below, the project fails spectacularly at meeting Policy 1.1, well exceeding the 65dB noise limit at the property boundary.



41-22

Instead of using the legally required definition of Policy 1.1 above, the authors of the DEIR apply a particularly tortured view of the policy and push the limits for acceptable noise levels by measuring at the nearest property boundary of a "sensitive receptor." Basically they've tried to push the problem as far out as possible to avoid appearing to be in conflict with city policy by claiming that the noise isn't greater than 65dB at the closest neighboring property lines. Even this claim is not correct, as it can be easily seen in their own sound pressure level map above, that noise levels of 64- 68dB extend well into the Purisima Highlands neighborhood."

Mr. Osborne continues with this analysis:

"There is also a continued reference throughout the noise section of the DEIR to the 75dB limit associated with a manufacturing facility as if that 75dB noise limit somehow applies to this proposed park. This proposed location is not zoned as commercial but "PF" for Public Facility, so it still falls under "community facility; park," at a maximum acceptable noise limit of 65dB.

The real kicker here though is "note 4" from 2030 General Plan table N-1 above, which states - "In areas affected by aircraft noise, the standard is 65 Ldn with the stipulation that the noise level exclusive of the aircraft generated noise cannot exceed 60 Ldn" So, even if someone wants to argue that the proposed park is being built at the airport which is already noisy so it shouldn't matter how loud the park is, that's simply not true. The city does recognize that it is noisy there, and as a result, stipulates that no additional noise sources in excess of 60Ldn should be allowed.

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Using even the poorly constructed sound level models in the noise study, the proposed park adds a noise source level of 88dB to the area outside of the project property line, which is 28dB above the "noise level exclusive of aircraft." This 28dB increase is almost 700% louder than acceptable according to the 2030 general plan for areas affected by aircraft noise.

To wrap up this "policy section" review of the DEIR noise study, Policy 2.2 of the 2030 General Plan noise element states - "The City shall require acoustical studies, prepared by a qualified acoustical engineer, for new development projects anticipated to either: (1) result in an ambient increase of five dBA Ldn; or (2) produce noise within five dBA/Ldn of the noise standard or greater than the noise standard for the proposed land use(s) under existing or future conditions. Should noise abatement be necessary, the City shall require the implementation of mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a

These sound power estimates grossly underestimate the true noise potential from the proposed park. The California OHV legislation, dependent on model year, allows for OHV exhaust noise output to be up to 96dB - 101dB per OHV. The proposed park is designed to support 24 racing motorcycles in competition events - the effective combined output noise level of the 24 OHVs running simultaneously at 92dB (3dB below the lowest limit to be "nice") is 105.8dB. If you add in two drag racing vehicles at 92dB with that, the total grows to 106dB. This results in a ~13dB difference or well over **100% louder than what has been put into the model as a starting point for the noise sources.** 41-22

Registered Professional Engineer in the State of California with a minimum of three years of experience in acoustics)." This may or may not be an issue, since the reference in the above policy of using a Registered Professional Engineer is only meant to be an example of a qualified person that would be able to prepare the noise study. However, the consultants who prepared this study [http://www.meridianconsultantsllc.com/our-team.html] do not have a single acoustical engineer (or any civil engineers) on staff, much less a Registered Professional Engineer according to the above linked online biographies. All of the technical staff of the consultants are trained and certified in some form of Urban Planning/Development and are experienced, so it could be argued that they are qualified to do the acoustic study since a P.E. isn't mandated by the noise policy, but they're not acoustics engineers."

Mr. Osborne's report was posted at this website:

https://4.bp.blogspot.com/-8xaL8mijgr8/V33g8DVM8ZI/AAAAAAAAEOE/B4rPccb5jTQeQYCgVeqwF6rN8wZOJet2QCK4B/s1600/dragOHV.png

This is the description in the Draft EIR of the Noise test of the vehicles, page 4.10-29. Note that the engine sizes, types of vehicles, open or closed exhaust are not mentioned. 41-23

The operational noise model for drag strip use is based on pass-by tests conducted utilizing similar vehicles that would be operated during operation of the proposed Project. Four vehicles

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OHV measurements

According the DEIR four OHVs were measured to characterize the expected noise outputs of representative vehicles that will be used at the proposed park site. These OHVs are also noted as having met the Off-Highway Motor Vehicle Recreation Act of 2003 legislation for exhaust noise output. What is not defined is exactly what test procedure was used to characterize the noise output, other than a mention of "pass-by runs." The OHV legislation mandates that the exhaust noise measurements be taken 20 inches from the vehicle. With no definition of the actual process used here, it's possible that the data taken from the OHVs in this study were captured a distance greater than 20 inches. The measurement of noise levels has a strong and direct dependence on the distance from the source where the measurements are made. Without this data, it is not possible to know if the vehicles used actually meet the California OHV legislation for exhaust noise, as most vehicles that have had owner modifications done rarely meet the noise standards, and the data are at best poor approximations of what noise levels an OHV at the proposed park creates during operation. 41-23

were tested separately for approximately 5 minutes. To simulate drag race conditions, engines were accelerated three times within a 5-minute span to capture peak noise measurements. In addition, two of the louder vehicles were recorded simultaneously during a 5-minute span to capture cumulative worst-case conditions. Those standards and measurements were then programmed into the SoundPLAN modeling system.

The ambient noise levels at surrounding sensitive receptor locations were determined based on measurements obtained with noise meters. The operational noise levels were calculated for sensitive receptor locations using SoundPLAN. Also, the modeling accounts for large differences in topography, and the presence of intervening structures or landscaping that would block a direct line of sight between operation activity from the proposed Project site and nearby homes.

Public Services

Fire Protection and Emergency Services

4.11-1 *Prior to the completion of the off-highway-vehicle (OHV) component, the Applicant shall coordinate with the Lompoc Fire Department to develop and implement an Incident Plan describing the fire inspection and protection services to be provided by the LFD and identifying the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications and supervisory personnel. The Incident Plan shall also identify fire suppression equipment, supplies, and other services to be provided by the site operator during future motorsports events, including the number of fire personnel and/or EMS personnel. The site operator shall reimburse the City for fire inspection and protection services provided under the Incident Plan.* 41-24

The proposed Project could likely generate an intermittent increase in demand for police services during events held on site as up to 2,620 persons could be onsite. Additional police

services may be required on site for law enforcement, peacekeeping, crowd control, and potentially traffic control on the affected roadways. Accordingly, impacts on the LPD's ability to provide law enforcement services would be potentially significant.

The city should require the Foundation (the developer) to deposit $100,000 in a trust account with the city before approval for construction of the project to assure services such as this are funded. As funds are drawn, the Foundation will required to deposit funds so that the account will have an account balance at or above $100,000. Because this facility is funded with public funds - state grant funds with matching funds required, the city needs to assure the park will be open, staffed with the appropriate number of qualified staff and assure those staff will not be required to assist other situations that may interfere with operation of the park. 41-24

or,

Contract with a private security firm for crowd supervision for peacekeeping, internal traffic and parking control and with the fire department on an annual basis for the fire services in the operation of the park. EMS may require full ambulance services during race events.

Traffic and Circulation

4.13-1 *The proposed Project shall contribute its fair share contribution to the City's improvement plan for the Central Avenue/H Street intersection prior to the issuance of building permits. The City identified improvements for the Central Avenue/H Street intersection, including the installation of dual left-turn lanes on the northbound and southbound approaches to the intersection.* 41-25

The H Street and Central Avenue intersection is the most congested intersection in the city. This intersection will be an integral area for vehicle and pedestrian traffic with the development of this park. The city should have the plans and the funds in hand before approval of permits to construct the park. That will assure the improvement to this heavily congested intersection, as well any other vehicle and pedestrian situations effected by this project, are addressed to minimize impacts.

4.13-2 *Prior to completion of the Off-Highway Vehicle (OHV) component, the proposed Project applicant shall develop and implement a Traffic and Parking Control Plan for large weekend events (greater than 250 vehicles) that shall include, but not be limited to, detailed provisions for, traveler information, a signage plan, traffic control personnel, entry gate operations, and pedestrians as outlined below. The proposed Project operators shall submit the Traffic and Parking Control Plan to the City Economic Development - Planning Division and the City Police Department for review and approval prior to each event which exceeds 250 vehicles for weekend events. Once developed and implemented, the elements of the Traffic and Parking Control Plan shall be monitored and adjusted accordingly for the various sized events held at the site.* 41-26

As stated above, the funds and plans required for this project need to be deposited and submitted with the city before construction begins. This will assure the improvements to the intersections, particularly and H Street and Central Avenue, can begin to counter the impact this project will cause to vehicle traffic and pedestrians. 41-26

These are the mitigations proposed in the Draft EIR. These, and possibly other mitigations, should be considered and funding in place prior to issuing permits for the project:

-Traveler Information

The Traffic and Parking Control Plan shall include dissemination of site access and parking information for attendees and participants prior to events. Directions could be provided as part of information mail outs, ticket information, and via a website developed specifically for the Motorsports Park.

-Signage Plan

The Traffic and Parking Control Plan shall include advanced signing within the vicinity of the site to direct traffic to the entry gate prior to events as well as signs to direct traffic leaving the Lompoc area at the end of events. Directional signs shall be provided on SR 1 and on Central Avenue as needed. The signage plan shall include 'No Parking' signs along the segment of V Street between Central Avenue and the proposed Project site in order to minimize congestion and to reduce the number of pedestrians walking along the entry road. 41-27

-Traffic Control Personnel

Traffic control personnel shall be placed at on-site and off-site locations to assist with traffic flows at the start and end of events. Traffic control personnel should be provided on-site as necessary to direct vehicles to parking areas prior to events and to provide orderly traffic flows at the end of events. Also, it may be necessary to provide a traffic control officer at the Central Avenue / V Street intersection in order to assist with the flow of vehicles leaving the site at the end of large events.

Entry Gate Operations

The single lane access road can accommodate 250 to 350 vehicles per hour at the control booth for events that require vehicles to stop and pay for parking. It is recommended the operators of large events employ multiple parking cashiers at the entry gate to speed the rate of entering vehicles. Cashiers would walk along the vehicle queue and collect fees prior to the gate, or, the parking fee collection system could be altered to collect fees after vehicles have parked in the parking lots, or, parking fees could be included in event ticket price (and not collected at the entry gate).

Pedestrians

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The Traffic and Parking Control Plan shall include provisions to guide pedestrians to safe walking areas within the site during large events.

These conditions need to be in place before permits are approved for construction and the developer needs to agree to these conditions in order to mitigate enforcement and crowd control. 41-27

Permitting vehicles to enter without paying at the gate can be problematic. First, operators may not collect the fee, second, there can be dispute as to whether the fee was paid at the gate or previous to the gate, and third, these fees will be needed for the operation and maintenance of the park and this allow the operators to be financially responsible for the management of the park without funding from the city.

Central Avenue/H Street intersection is forecast to operate in the LOS D range during the weekday PM peak hour period with Cumulative and Cumulative plus Project traffic conditions. The Project would add 117 weekday PM peak hour trips to the Central Avenue/H Street intersection is forecast to operate in the LOS D range during the weekday PM peak hour period with Cumulative and Cumulative plus Project traffic conditions. The Project would add 117 weekday PM peak hour trips to the 41-28

The Central Avenue and H Street intersection is becoming more impacted with more development in the areas north and west. This project, with the types of vehicles with large trailers, will exacerbate the problem more. For that reason, the site for this proposed Motorsports project will cause more traffic congestion.

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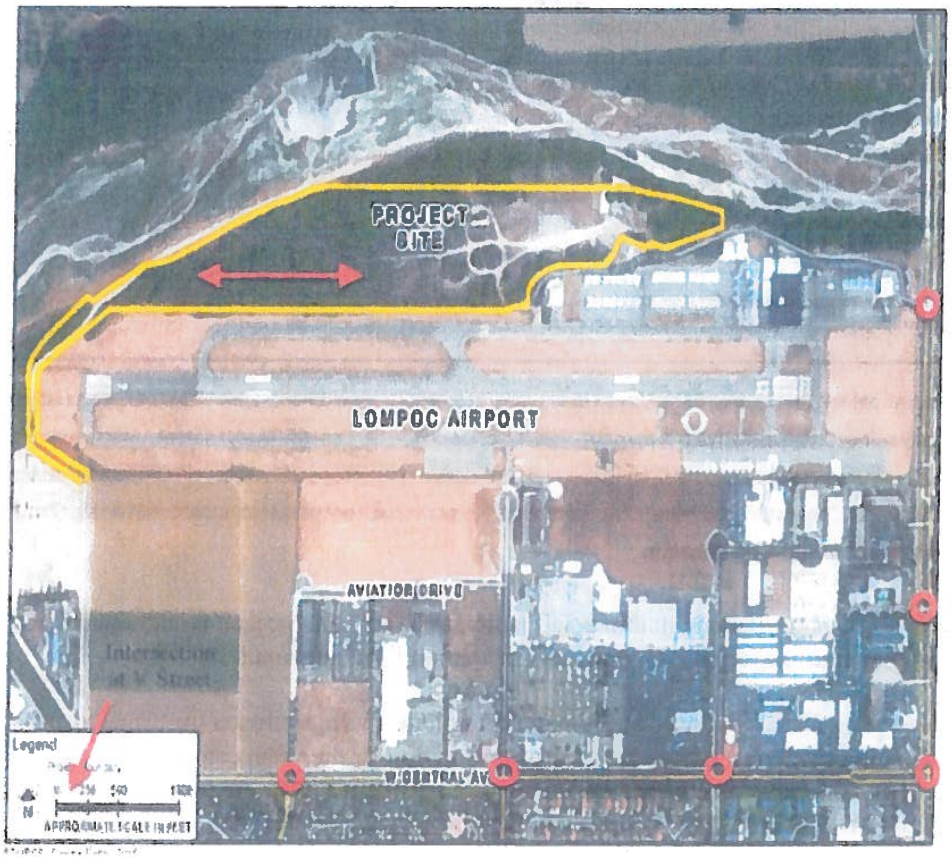
The intersections circled in red will be most impacted:

The arrows indicate the approximate area of the drag strip.



41-28

Many of the vehicles entering and exiting the Motorsports Park will be vehicles with trailers. <u>The intersection at George Miller Drive has no signal light.</u>

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Table 4.13-12
Cumulative plus Project Levels of Service – Weekday PM Peak Hour

Intersection	Cumulative V/C or Delay	Cumulative LOS	Cumulative plus Project V/C or Delay	Cumulative plus Project LOS	Trips	Impact?
SR 1 / Harris Grade Rd. / Purisma Rd.	22.8	C	24.2	C	28	No
SR 1 / George Miller Dr.						
Inbound Lefts	13.8	B	17.3	C		
Outbound Lefts + Rights	23.1	C	21.8	C	145	No
Overall Intersection	18.8	C	18.1	C		
Central Ave. / H Street	38.4	D	40.0	D	117	YES

Source: Associated Transportation Engineers, April 2016.
Note: Bolded values exceed the City's LOS C standard (greater than 35 seconds of delay per vehicle – LOS D)

As show in Table 4.13-12, two of the three study area intersections would operate at LOS C or better under Cumulative and Cumulative plus proposed Project conditions. The Central Ave/H Street intersection is forecast to operate at LOS D under Cumulative and Cumulative plus proposed Project conditions, exceeding the City's LOS C operating standard. The proposed Project would contribute to a potentially significant cumulative impact at this intersection.

41-28

In the traffic study is the statement above with emphasis on: "The project would contribute to a potentially significant impact at this intersection" (Central Avenue and H Street).

The proposed mitigation of adding additional turning lanes will not lessen the impacts to this intersection, it may well exacerbate the problem by adding further congestion to the signaled intersection into and out of the Albertson's Shopping Center and all other intersections on Central Avenue to V Street which is the planned main entrance to the park.

Primary access for the proposed Project site during weekday events is proposed via the existing George Miller Drive connection to SR 1. Secondary access (emergency vehicles only) is proposed via the new connection to the north end of V Street. Primary access for large events planned on weekends would be provided via a new roadway connection to the north end of V Street (with emergency access provided by George Miller Drive). As such, there is adequate viewing access and gaps in order for vehicles during the weekday to safely enter and exit the proposed Project site. Larger weekend events could impact circulation system during the proposed Project.

41-29

George Miller is a narrow primary road into and out of the airport. It is not good planning to use this road for the Motorsports Park Project. If the project is to be approved, the developers should be required to fund the cost the road at V Street that will allow two way traffic, ample pull off space on each side of the road comply with the mitigations of **4.9–2 in Land Use and Plannning.**

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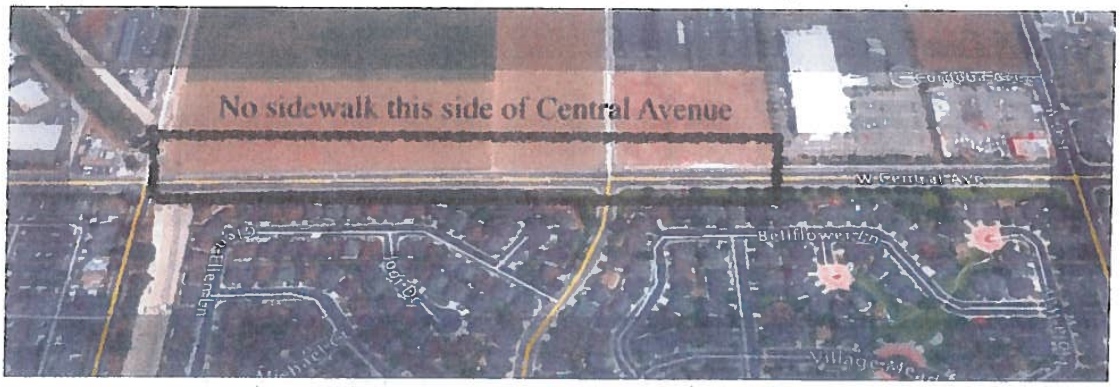
Prior to the use of V Street access way, the developer shall construct a height-restricting barrier over the entry-way to the proposed Project site's access point on "V" Street and the Approach/ Departure Surface are such that it restricts access to vehicles to more than 12 and 1/2 feet including antennas, roof racks and roof top carriers.

As a secondary option to the height-restricting barrier, the Project applicant shall lower the V Street access elevation to 15.5 feet below the existing elevation of the Approach/Departure Surface such that vehicles less than 22.5 feet including antennas, roof racks, and roof top carriers will not penetrate the Approach/Departure Surface.

As discussed above, there is an existing Class I bike path that runs along the west side of SR 1 in the vicinity of the Airport and Class II Bikeways are present on Central Avenue in the vicinity of the proposed Project site. Additionally, sidewalks are provided along H Street and Central Avenue in the Project vicinity. Pedestrian circulation on-site within the drag strip area would be provided via pedestrian paths, a crosswalk, and a future pedestrian bridge. The proposed Project would expand the City's existing pedestrian circulation, thereby allowing the site to be accessed by a system of sidewalks in addition to bike lanes.

This statement is not wholly correct, *"Additionally, sidewalks are provided along H Street and Central Avenue in the Project vicinity."* 41-30



From approximately east of Barton Avenue to V Street, there is no sidewalk to the north side of Central Avenue. Any pedestrian that side of Central Avenue must share the bike path and that is potentially hazardous. With this project, <u>the developer should be required to fund the cost to connect to the existing sidewalk that side of the avenue.</u>

Water Service

A new well would be drilled on the proposed Project site for non-potable water use for dust control during OHV events. Additionally, two fire hydrants are proposed to be constructed on the proposed Project site. 41-31

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This mitigation conflicts with the city's current policy of conservation and the city raising water rates for 5 years that begun in 2013.

The use of water to control dust on a project of questionable benefit to the city and the airport, appears to be extremely poor planning. This is a waste of a valuable resource and other mitigations should be considered, i.e., wall or berm and/or cover the area to capture and retain dust and other contaminants. 41-31

Sewer

Development of the proposed Project is expected to increase demand for wastewater service within the City. However, all wastewater would be contained and removed from the site daily. Restrooms would be provided by portable toilets which would be brought to the site for events and removed as necessary. All wastewater would be collected onsite from restrooms and concessions and trucked off site for disposal. No new or existing sewer lines would need construction as the Project would not be using sewer lines. 41-32

Because this project is planned to be permanent at the proposed site at the Lompoc Airport, the operation of that park with portable restrooms will be a continuous management issue. By not having direct water and wastewater lines, this will give this park the appearance of a campground. There is the potential of leakage into the river with portable restrooms and this should be carefully evaluated as to the health and environmental consequences to the river area.

Solid Waste

The project will add additional debris and waste to Lompoc Sanitary Landfill. This is estimated amount in the draft EIR:

....the proposed Project would generate approximately 17.2 tons of construction and demolition debris which would be disposed of at the City of Lompoc Sanitary Landfill. 41-33

The operation of the park is estimated to:

.....generate approximately 138.1 tons of solid waste per year, which would be sent directly to the Lompoc Sanitary Landfill.

This essentially counters many years of citizens decreasing waste to the landfill.

How will the developer provide and maintain large waste and recycling containers to be out of sight and preventing the waste from entering the river area?

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Dry Utilities

The proposed Project would ..... use 15 55-foot-high light poles ..... on the proposed Project site.

In the event of a flood, how will these lights poles be removed from the floodplain?

In summation, this project will cause impacts of noise, traffic, more people, harm to the river area, additional hazards and distractions to the airport operation, and is questionable as a benefit as a non aeronautical part of airport operations. Although many of the mitigations listed in the report are stated "less than significant," this appears to be questionable with the degree with what is required in the mitigations, i.e., acquisition of land, water retention basins, noise, traffic, lighting, spectators in the sideline of the airport as a hazard, V Street height restriction, the moving of Santa Barbara Skydive's parachute landing area, police and fire service with both departments operating understaffed, and Air Quality "significant and unavoidable for VOC and NOx." 41-34

This report has revealed the very real impacts this project will have on this community and for those reasons and possibly many more yet to be identified with the NEPA report, this project should be denied.

27

Letter No. 41: Terry Hammons, August 10, 2016

Response 41-1

The Draft EIR notes proposed Project operations, including lighting, would be sporadic and temporary, and limited to specific Project events. Section 4.1 (see page 4.1-15) of the Draft EIR notes outdoor lighting would comply with Title 24, Part 6 of the California Code of Regulations, Energy Efficiency Standards for Nonresidential Buildings. All lighting shall conform to the standards set forth in the Lompoc Municipal Code. Lighting to illuminate event areas will be used during events, but shall be shielded and focused downward reducing direct light in the direction of open space and the Santa Ynez River. Lights would be meet FAA standards, and the fixed light towers would also have aircraft warning lights atop each pole. The proposed Project's lighting would be cleared by the FAA; therefore, safety impacts related to lighting features would be less than significant.

Response 41-2

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

According to CEQA Guidelines Section 15126.4(a)(5), if the lead agency determines a mitigation measure cannot be legally imposed, then the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination. If the City Council certifies the Final EIR and decides to move forward with the Project, then the City Council would need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits from the proposed Project outweigh the significant unmitigated impacts.

Response 41-3

Please refer to Response 41-2.

Response 41-4

Please refer to Topical Response 6 regarding the mitigation area. As discussed, any future mitigation site may be subject to review and approval by the California Department of Fish and Wildlife (CDFW) and would be subject to the conditions of SAA No. 5-2001-0252. As stated in Comment Letter 2, CDFW will

make a final determination of the 1602 jurisdiction upon Project approval and receipt of notification for a Streambed Alteration Agreement (SAA).

Response 41-5

Please refer to Response 41-4 above.

Response 41-6

The proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application. Compliance with these requirements would result in less than significant water quality impacts to the river.

Please refer to Topical Response No. 3, Hydrology for additional water quality clarification.

Response 41-7

As discussed in Section 4.4 Cultural Resources of the Draft EIR, the City consulted with the Santa Ynez Chumash Reservation Elders Council in accordance with Assembly Bill 52. After consultation, the City agreed to contact the Santa Ynez Band prior to any initiation of ground disturbing activities and to allow tribal member(s) to monitor excavation and grading activities. Please refer to Mitigation Measures MM 4.4-1 and MM 4.4-2 of the Draft EIR for a detailed description of the tribal members' involvement during grading and ground disturbing activities.

Response 41-8

As discussed in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, information was gathered from the review of various hazardous materials databases and included a site-specific Phase 1 Environmental Site Assessment (**Appendix 4.7A** of the Draft EIR). Mitigation measure MM 4.7-1 has been identified to reduce potential impacts on undiscovered underground storage tanks (USTs). Impacts would be less than significant.

Please refer to Response 41-6 regarding water quality.

Response 41-9

The comment refers to water quality impacts and all identified regulations and proposed mitigation shall be applied prior to construction of the proposed Project. The comment is noted.

Response 41-10

Section 4.14, Utilities, of the Draft EIR provides a discussion on the potential water supply.

As stated in the Draft EIR, the City's Water Division provides services for the production, treatment, and distribution of safe drinking water. The sole source of potable water within the City of Lompoc is derived from groundwater resources through the pumping of the Lompoc Groundwater Basin.

The proposed Project's sources of water, water supply, and demand quantities is based predominantly on the City's 2010 Urban Water Management Plan (UWMP), the City's Groundwater Management Plan, and the City General Plan. The City's UWMP contains the current and future availability of water resources within the City of Lompoc based on land uses. As discussed in the City's 2010 UWMP, the commercial, institutional, and industrial sectors are projected to increase water demand approximately 146 acre-feet per year (afy) over the next 20 years (this is being updated in the 2015 Urban Water Management Plan).[3] The proposed Project's 7.95 afy would account for approximately 5 percent of the increase in projected water demand in the commercial, institutional, and industrial sectors over the next 20 years. Therefore, the City has adequate water supplies to meet the demands of the proposed Project.

Please refer to Topical Response No. 3, Hydrology for flooding impacts.

Response 41-11

This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 41-12

Section 4.2, Air Quality, of the Draft EIR, addresses potential emissions that could degrade air quality.

Please refer to Response 13-1.

3 The total projected 146 afy water demand increase includes the 137 afy increase from the commercial and institutional sector and the 9 afy increase industrial sector.

Response 41-13

As discussed in Section 4.7, Hazards of the Draft EIR (see 4.7-18 and 4.7-19), a variety of State and federal laws govern the generation, treatment, and/or disposal of hazardous wastes. The City Fire Department and Santa Barbara County Department of Public Health, Hazardous Materials Division inspect on-site uses and enforce State and federal laws governing the storage, use, transport, and disposal of hazardous materials and wastes. Acting as the County's designated CUPA, the County of Santa Barbara Fire Department Hazardous Materials Unit requires an annual inventory of hazardous materials in use on site, as well as an HMBP, be submitted for an annual review, as required by the Emergency Planning and Right-to-Know Act and the California Accidental Release Prevention Program. Those requirements would be mandated according to State and federal law. Compliance with those regulatory measures during operation of the proposed Project would not result in a significant impact to the exposure of hazardous materials. Impacts would be less than significant.

Response 41-14

As discussed in t Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, information was gathered from the review of various hazardous materials databases and included a site-specific Phase 1 Environmental Site Assessment (**Appendix 4.7A** of the Draft EIR). Mitigation measure 4.7-1 was identified to reduce potentially significant impacts from unknown USTs.

The comment is noted and will be forwarded on to the decision makers.

Response 41-15

Please refer to Response 41-6.

Response 41-16

Please refer to Response 41-1.

Response 41-17

Any construction would be subject to building permits to be issued by the City. The conditions identified in any permits would apply. The comment is noted and will be forwarded on to the decision makers.

Response 41-18

The Draft EIR identifies a number of mitigation measures. If the City adopts the mitigation measures, then the City would be responsible for assuring the measures are completed as required by the CEQA Guidelines Section 15097 as noted below:

- In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure.

Response 41-19

Please refer to Response 41-2 and Response 41-18.

Response 41-20

As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval; if approved, then it would comply with FAA regulation for Parachute Landing Areas (PLA).

Please refer to Response 14-1.

Response 41-21

As discussed in Section 4.3 of the Draft EIR, the proposed Project would not directly or indirectly impact the active Santa Ynez river channel. While critical habitat for the southern California steelhead (*Oncorhynchus mykiss irideus*) is within and contained by the Santa Ynez River adjacent to the Project site; there is no Critical habitat for the southern California steelhead on site. As such, the proposed Project will not have any direct impacts on the southern California steelhead.

Based on the site conditions, it was determined by the biologist, these efforts were adequate to the complete the EIR. Accordingly, the proposed Project would not conflict with any adopted habitat conservation plans.

Response 41-22

Section 4.10 of the Draft EIR evaluates noise impacts from both roadway noise (vehicles traveling to and from the site) and on-site noise from motorsports park events. Please see Response 13-1. In addition, please refer to Topical Response 7, Noise for a discussion regarding noise methodology and consistency with the City's General Plan policies.

Response 41-23

Please refer to Response 41-22.

Response 41-24

The Draft EIR provides analysis of potential impacts to police and fire services (see Section 4.11).

No further response is necessary because no issues related to the adequacy of the environmental impact analysis in the Draft EIR were raised.

Response 41-25

Please refer to Response 43-8.

Response 41-26

No further response is necessary because no issues related to the adequacy of the environmental impact analysis in the Draft EIR were raised.

Response 41-27

Please refer to Response 41-8.

Response 41-28

Please refer to Response 41-25.

Response 41-29

Please refer to Response 41-25.

Response 41-30

To clarify, sidewalks are located on the southern portion of Central Avenue. As discussed under Impact 4.13-1 in Section 4.13 of the Draft EIR for Site Access and Circulation, there is adequate viewing access and gaps for vehicles during the weekday to safely enter and leave the proposed Project site via George Millar Drive. Additionally, for larger weekend events, which would utilize V Street, **Mitigation Measure 4.13-2** would be implemented in order to provide safer access for pedestrians and vehicles entering and leaving the site. Accordingly, impacts would be less than significant.

Response 41-31

Please refer to Response 41-10.

Response 41-32

As discussed in Section 4.14 Utilities and Service Systems of the Draft EIR, restrooms will be provided by portable toilets. All wastewater will be collected on site from restrooms and concessions and trucked off site for disposal at approved disposal facilities. Most likely, wastewater would be transported and treated at the City-owned Lompoc Regional Wastewater Reclamation Plant (LRWRP), which provides primary, secondary, and tertiary treatment for wastewater. The LRWRP meets the requirements set forth by the RWQCB and no upgrades or changes would result from the proposed Project.

Response 41-33

Please refer to Response 41-18. The City will implement the MMRP in order to ensure the enforceability of the adopted mitigation measures.

Response 41-34

The Draft EIR provides a discussion of the potential impacts to noise (Section 4.10), traffic (Section 4.13), hazards (Section 4.7), hydrology (Section 4.8), land use (Section 4.9), and the Topical Response No. 3, Hydrology. Please refer to the Draft EIR for a discussion of these impacts.

Please refer to Response 41-18 for enforceability of mitigation.

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR.

Motorsports Park lighting for night events will be a distraction to pilots during night time takeoffs and landings. This is a significant safety concern. 42-5

6) Land Use and Planning: 42-6

The Motorsports Park is not addressed in the Airport Master Plan and it will require replacement of the Airport Master Plan at significant additional expense.

Unable to sign electronically. Please call 805-733-4635 or 588-0805 if signatures are required.

RECEIVED

AUG 10 2016

Planning Division

2

From: rewyckoff [mailto:rewyckoff@verizon.net]
Sent: Wednesday, August 10, 2016 11:00 AM
To: Breese, Lucille
Subject: Motorsports Park-Wyckoff EIR Response

11 Aug 2016 Motorsports Park EIR Response from **Robert and Eileen Wyckoff, 4346 Aquarius Rd., Lompoc, CA 93436**

City Project No. EIR 15-01 / CUP 14-01

1) **Mitigation Requirements:**

The Mitigation Requirements pertaining to the Motorsports Park proposed location on the Lompoc Airport property requires a 72.4 land purchase and replacement of the trees at a multiple of those taken out as well as a five-year nurturing period. This constitutes a very high outlay of funds upfront and is for a land use not related to aviation purposes. Who will pay for this; the city? For the last 30 years Airport Improvement Projects (AIP's), including the repaving of George Miller Drive, have been funded primarily by FAA funds. However, these grants are only for projects related to aviation, so they will not be available for this project. Again, who will pay this substantial amount? 42-1

2) **Impact on Aviation Operations:**

Skydive Santa Barbara has operated safely from Lompoc Airport for many years and uses part of the land to be provided to the Motorsports Park for its skydive recovery area. This incursion will force Skydive Santa Barbara to relocate this operation, thus depriving the Lompoc Airport of the rent for hangar space and considerable fuel sales for the benefit of a non-aviation-related activity. 42-2

3) **Noise:**

Noise generated by aircraft taking off and landing (power off for this) is infrequent and transitory. Noise from the Motorsports Park activities will be loud, static, and prolonged. The noise will travel all over the city and up the surrounding residential hillsides. 42-3

4) **Access:**

George Miller Drive is inadequate to Motorsports Park needs and was last repaved by the FAA. It is already congested on weekends with aviation-centered activities. The FAA will not be a source of relief of crowding due to non-aviation-related activities. 42-4

5) **Light pollution:**

Letter No. 42: Robert and Eileen Wyckoff, August 10, 2016

Response 42-1

In 2001, the City completed an expansion of Runway 7/25 (Runway Expansion Project) to the west, and resulted in the removal nearby vegetation to accommodate air traffic operations. As a result of the Runway Expansion Project, a mitigation area was established off-site area south of the Santa Ynez River, just due north of the western extent of Runway 7/25 and is approximately 7.1 acres in area set aside as mitigation to offset the loss of riparian woodlands and scrub communities and the replanting that would need to be removed as a result of the Runway Expansion Project. The Runway Expansion Project was completed with funding from FAA.

When airport owners or sponsors, planning agencies, or other organizations accept funds from FAA-administered airport financial assistance programs, they must agree to certain obligations (or assurances). Those obligations require the recipients to maintain and operate their facilities safely and efficiently and in accordance with specified conditions. The assurances may be attached to the application or the grant for Federal assistance and become part of the final grant offer or in restrictive covenants to property deeds. The duration of those obligations depends on the type of recipient, the useful life of the facility being developed, and other conditions stipulated in the assurances. The terms, conditions and assurances of the subject grant agreement shall remain in full force and effect throughout the useful life of the facilities developed or equipment acquired for an airport development or noise compatibility program project, or throughout the useful life of the project items installed within a facility under a noise compatibility program project, but in any event not to exceed twenty (20) years after the date of acceptance of a grant offer of Federal funds for the project. However, there shall be no limit on the duration of the assurances regarding Exclusive Rights and Airport Revenue so long as the airport is used as an airport. There shall be no limit on the duration of the terms, conditions, and assurances with respect to real property acquired with federal funds.

The Runway Extension Project has a 20-year assurance period.

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

As noted in Section 4.3, Biological Resources, of the Draft EIR, implementation of the proposed Project would result in the loss of 14.5 acres of arroyo willow thicket due to grading excavation. That acreage

includes 0.5 acres of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted above, the mitigation for the Runway Expansion Project was not successful. Loss of the arroyo willow thicket habitat is considered a significant impact.

The Draft EIR identifies the following mitigation measure to reduce impacts related to the biological resources:

MM 4.3-1 To offset impacts to arroyo willow thicket on site (14.5 acres), off-site mitigation will be implemented at a 5 to 1 ratio for a total of 72.5 acres (14.5 acres of impacted arroyo willow thicket at a 5 to 1 ratio equals 72.5 acres). This acreage includes 0.5 acre of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted, the mitigation for the Runway Expansion Project was not successful so no credit is given for that mitigation.

Mitigation may be conducted adjacent to the Project in remaining arroyo willow thickets, and/or at appropriate off-site City-owned properties. Should off-site locations be considered, they should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River.

Mitigation shall be provided for through the development of a Restoration and Mitigation Plan (Plan). The Plan will compare the performance of the mitigation area against the recommended performance criteria to identify any shortcomings or problems in the mitigation area. The Plan will include methods for evaluation of plant establishment, vigor, and health, and for evaluating the percent cover by native and non-native plant species. In addition, the Plan will include specific details on a planting palette invasive species removal and methods for planting and irrigation. The following is a preliminary conceptual planting palette and schedule of success criteria. The planting palette and success criteria may change and will be adapted to site specific conditions when a final off-site mitigation area is selected. The Plan should provide for quarterly monitoring visits during the first year, biannual visits during the second and third years, and annual visits during the fourth and fifth years.

The Project Plan will be developed in consultation with City of Lompoc and submitted to the CDFW for review and concurrence at least 30 days prior to beginning construction.

According to the CEQA Guidelines Section 15131 Economic and Social Effects state that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 42-2

Please refer to Response 14-1 and Topical Response 8 regarding Skydive Santa Barbara.

Response 42-3

Section 4.10, Noise, of the Draft EIR provides a discussion of the potential impacts. In addition, please refer to Topical Response 7.

Response 42-4

See Response 35-10.

Response 42-5

See Response 40-6.

Response 42-6

The purpose of the Airport Master Plan is to identify future airport needs and improvements. The FAA approved the City's proposed Airport Layout Plan (ALP) in 2011. The approved ALP does not include any improvements in the area where the proposed Project is to be located. Currently, the ALP is being updated to include additional improvements including the proposed Project, a sewer line running sub-surface, and a capital improvement plan to upgrade electrical features and rehabilitate the Airport's north apron. In addition, the Lompoc Airport Master Plan Update does not include any future improvements within the proposed Project's boundaries. Any revisions to the ALP are subject to review and approval by the FAA before the City can implement the proposed Project.

718 St. Andrews Way
Lompoc, CA 93436
August 12, 2016

RECEIVED

AUG 12 2016

Planning Division

Lucile Breese, AICP,
Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Staff:

Re: Lompoc Motorsports Project Draft Environmental Impact Report

Thank you for the opportunity to comment on the Draft EIR for the Lompoc City Motorsports facility which is proposed adjacent to the Santa Ynez River.

Aesthetics:

The draft EIR assumes the park will be built by professional contractors who will be selected by a city bidding process. However, the Parks Foundation claim they will build the park with volunteer labor. The draft EIR should include a detailed building plan to assure the facility will be built to code by a properly vetted construction company. The public has only seen a very rough site plan. 43-1

Biological resources:

Past projects proposed for the riverbed area have listed several agencies which must weigh in regarding the river bed riparian area. In recent years, the CA Department of Fish and Wildlife has been actively monitoring the Santa Ynez River riparian area and they need to provide their analysis both of the biological resources but also the history of illegal activities in the riverbed which have already degraded this fragile biological area. The DEIR does not seem thorough in its analysis of this environmentally sensitive habitat. 43-2

Geology and Sands

Longtime residents can remember flooding along the Santa Ynez River. This park is sited in the flood plain and if there were a flood in this area, the chemicals stored at and embedded in the soil from the vehicles at this park could cause widespread contamination. This needs more study. 43-3

Air Quality

The DEIR cites a Class 1 impact for Air Quality but the study was not adequate. The races at this facility will include a practice called 'burn out' where the racers are allowed to spin their tires for 20-30 seconds before racing, causing the tires to heat and smoke, 43-4

causing toxic particulate matter to be released into the atmosphere. Please see below for a description found online:

Drivers wear particulate masks/filtered helmets. Particulate matter from tires back in the 50's didn't even contain many of the chemicals we now use to produce tires (PCBs, dichlorobenzene, trichlorobenzene, tetrachlorobenzene, hexachlorobenzene, chlorophenol, and dichlorophenol, which are all highly toxic compounds and are all either proven or suspected to be carcinogenic. How about gasoline, alcohol and other fuels used to improve engine performance? It contains stuff like benzene, toluene, naphthalene, trimethylbenzene, methyltert-butyl ether and about ten other chemicals. 43-4

An analysis of this activity must be added to the study in the DEIR.

Also, the DEIR does not mention Odor impacts from the project. Anyone who has attended motosports activities will tell you there are odors emanating from the car engines and tires at these races.

Greenhouse Gas Emissions:

43-5

All projects need to adhere to County and State standards. The City of Lompoc has not established a GHG emissions policy so the DEIR should include the County standards and examine the project in light of these recently adopted policies.

Land use and Planning:

The DEIR does not include a section on Quality of Life impacts. Many communities now include this discussion in environmental reviews. This project will directly negatively impact the residents of more than 3000 homes within a 1 mile radius. The DEIR needs to examine the Quality of Life issues, such as response to noise, odor, and other negative impacts. 43-6

Noise:

The Noise Study is inadequate. Besides the racing cars, you will have the noise from the 'burn out' before each race and well as the revving of the engines of the cars in the 30 pits. The noise study was done with four cars which were parked behind berms, per observers of the study. 43-7

Most facilities of this nature have sounds registering over 105 dB. Noise travels in the Valley due to its topography and bowl-like conditions and noise should be measured in these various conditions.

The Noise study needs to include times when fog and/or wind are present, day and night.

The noise study did not consider PA system or sounds from concerts and other activities that are planned for this facility. 43-7

Transportation and traffic

The DEIR needs more input from Caltrans who control the access road from H St. just south of the bridge. The DEIR needs to show how the access road off H St. will be designed to prevent traffic buildup on the bridge and north on H. St. 43-8

Public Services
The DEIR claims that traffic will be mitigated by an RV park. This park needs to be included in this EIR or it will need its own environmental review. It is unusual for a project with its own environmental issues to be considered as 'mitigation'. 43-9

Lighting

All studies of noise/light need to be done during both daylight and night time situations. The DEIR does not study the impacts of the lighting on the airport runway. 43-10

Agriculture:

The DEIR is inadequate in its consideration of the impacts to adjacent farms. Chemicals/particulate matter could spread to the farmland to the west of this facility but this was not studied thoroughly. The farmers are already negatively impacts by illegal activity in the riverbed both to the east and west of the proposed project. 43-11

Population and Housing

The DEIR must study how the housing tracts, such as Providence Landing; Mesa Oaks; Purisima Highlands; Summit View, the Meadows, Glen Ellen and others within a 5 mile radius will be impacted by traffic, noise, lights, and odors caused by this project. 43-12

Alternative Sites: This section of the DEIR is inadequate. Specific sites should have been further studied. 43-13

I look forward to having these concerns addressed in the Final EIR.

Mary Ellen Brooks
Resident

Letter No. 43: Mary Ellen Brooks, August 12, 2016

Response 43-1

Section 3.0, Project Description, of the Draft EIR provides a discussion of the proposed Project and diagrams of the proposed facilities. Any construction would be subject to building permits to be issued by the City. Regardless of whether contractors or volunteers did the work, the conditions identified in any permits would apply.

Response 43-2

As stated in Section 4.3 Biological Resources of the Draft EIR, the proposed Project site is located within the Santa Ynez River streambed. The streambed is located within California Department of Fish and Wildlife (CDFW) jurisdiction. As stated in Comment Letter 2, CDFW will make a final determination of the 1602 jurisdiction upon Project approval and receipt of notification for a Streambed Alteration Agreement (SAA).

Also, please refer to Topical Response 2 regarding biological resources.

Response 43-3

Please refer to Response 21-4.

Response 43-4

Section 4.2, Air Quality, of the Draft EIR discusses potential air quality impacts from the operation of the proposed Project.

As discussed on page 4.2-26, a potentially significant public health standard would occur if the Hazard Index is more than 1.0 for non-cancer risk. For non-carcinogenic effects, the hazard index totaled less than one (8.5E-02 and 6.4E-02) for both the toxic 1 hour and 8-hour exposure scenarios. Therefore, non-carcinogenic hazards would be below the Hazard Index of more than 1.0 for non-cancer risk. Non-carcinogenic impacts would be less than significant.

The Draft EIR (see page 4.2-27) notes the closest sensitive receptors include residential development located approximately 0.3 miles to the southeast of the proposed Project site (residential area), approximately 0.4 miles to the south (hotel), approximately 0.4 miles to the northeast (La Purisima Highlands), and the Lompoc Airport approximately 50 feet to the south. As shown in Draft EIR **Table 4.2-7** and **Table 4.2-8,** criteria pollutants would not exceed SBCAPCD thresholds. Furthermore, the proposed Project would not expose sensitive populations to toxic air contaminants which exceed State or SBCAPCD thresholds. Therefore, impacts would be less than significant.

Section 4.2, Air Quality, of the Draft EIR discusses odor on page 4.2-28.

Response 43-5

Section 4.6, Greenhouse Gas Emission, of the Draft EIR provides a discussion of potential GHG emissions and impacts.

As noted on page 4.6-14, the City has not developed or adopted GHG significance thresholds. The City does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

In April 2015, the SBCAPCD adopted thresholds of significance for GHG emissions for stationary sources. The thresholds of significance adopted for GHG emissions are applicable to new or modified stationary sources. Stationary source projects include land uses with processes and equipment that require a SBCAPCD permit to operate, such as oil and gas facilities, landfills, and facilities with large combustion devices. Please note the adopted GHG thresholds previously identified were not designed to be applicable to land use development projects/plans (i.e., commercial and residential development projects).

The performance standard identified in the 2014 Updated Scoping Plan recommends a 15 percent reduction from business-as-usual (BAU) by 2020. That document is the most current reference which quantifies statewide GHG emissions and the percentage reduction required by AB 32 mandates to meet GHG reduction goals. As indicated in the 2014 Updated Scoping Plan, CARB encourages local governments and air districts to meet the 15 percent reduction below today's levels by 2020 to ensure their municipal and community-wide emissions match the State's reduction target. That threshold will not be applied in light of the California Supreme Court Decision found at 62 Cal.4th204, filed November 30, 2015, which requires examination of the data behind the BAU reduction.

The proposed Project would result in a potentially significant impact if it would:

- Exceed the 10,000 MTCO2e per year screening threshold;
- Show non-compliance with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions (sources subject to the AB 32 Cap- and- Trade requirements pursuant to Title 17, Article 5 (California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms); or
- Meet South Coast Air Quality Management District draft framework efficiency target for 2035: 3.0 MTCO2e per year per service population (defined to include participants/spectators/pit pass holders plus workers)

Response 43-6

"Quality of life" is not a threshold identified specifically by the City for evaluation by itself.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Response 43-7

Section 4.10, Noise, of the Draft EIR provides a discussion of the potential impacts. In addition, please refer to Topical Response 7, Noise. Furthermore, refer to Appendix 4.10 of the Draft EIR for noise analysis during the fall, winter, spring, and summer seasons.

Please refer to Response 40-4 regarding PA systems.

Response 43-8

As discussed in Section 3.0, Project Description, of the Draft EIR, the proposed Project would construct a 30-foot-wide road from the George Miller Drive entrance on the eastern end of the proposed Project site to connect with the new V Street access road on the western end of the proposed Project site. The George Miller Drive access point would be used for weekday access, private rentals for nonracing event access, and all emergency vehicle access to the proposed Project site. The V Street access point would be used for weekends, holidays, and special event access.

The Draft EIR notes that State Route 1 – H Street is located east of the proposed Project site, is a north-south California state highway. SR 1 is classified as a Major Arterial by the City, is named H Street within the City, and contains four lanes adjacent to the proposed Project site. H Street also includes a center left-turn lane north and south of Central Avenue. SR 1 extends north of Lompoc and connects to Vandenberg Village, Vandenberg Air Force Base, and the Santa Maria–Orcutt area. The posted speed limit is 45 miles per hour (MPH) north of George Miller Drive and 35 MPH south of George Miller Drive. The posted speed limit is 35 MPH north and south of Central Avenue.

While there are no direct impacts to H Street, the Draft EIR identifies the following mitigation that would affect H street:

MM 4.13-1 The proposed Project shall contribute its fair share contribution to the City's improvement plan for the Central Avenue/H Street intersection prior to the issuance of building permits. The City identified improvements for the Central Avenue/H Street intersection, including the installation of dual left-turn lanes on the northbound and southbound approaches to the intersection.

The Draft EIR notes the City has been collecting fees from individual developments located in the study area to fund the implementation of the improvement at the Central Avenue/H Street intersection. The City's planned improvement at that intersection is to install dual left-turn lanes on the northbound and southbound approaches. Improvements would result in a LOS C under Cumulative plus Project conditions during the weekday PM peak hour.

Cumulative impacts would be less than significant with mitigation and the proposed Project would not be considered cumulatively considerable.

Mitigation Measure MM 4.13-2 would require the applicant develop a traffic control plan to lessen this potential impact of queuing into the proposed Project site to less than significant. Compliance with existing regulations, **PDF 4.13-1**, and implementation of the **Mitigation Measures MM 4.13-1** and **MM 4.13-2,** would reduce potential proposed Project and cumulative transportation and traffic impacts to a less than significant level.

Response 43-9

The Draft EIR includes analysis of the entire proposed Project as described in Section 3.0, Project Description.

As noted in the Draft EIR, Section 3.0, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the proposed Project site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained. Because the proposed Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use.

With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant.

Response 43-10

Please refer to Response 40-5.

Response 43-11

As discussed in Section 6.0, Effects Not Found to Be Significant, of the Draft EIR, the proposed Project does not border any lands zoned for Agriculture. Therefore, due to the distance from the nearest agricultural resources, the proposed Project would not significantly affect agricultural resources or operations.

Section 4.9, Land Use, address concerns related to land use compatibility. A Fugitive Dust Control Plan would be required as part of the proposed Project to reduce any potential impacts related to particulate matter.

Response 43-12

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents.

Response 43-13

See Response 13-3.

Breese, Lucille

From: Dianne Burns [forensicsdb@gmail.com]
Sent: Friday, August 12, 2016 10:15 AM
To: Breese, Lucille; Dianne Burns; dianne.burns; Dorothy Vriend; Breese, Lucille
Subject: Lompoc Motorsports Project Draft EIR

Dear Ms. Breese:

After reading the 500+ page Draft EIR, I have the following comments to submit. Some capitalizations are mine for emphasis and are not part of the draft EIR text.

In general, I am alarmed by the multitude of negative environmental impacts this proposed project would generate.

In particular:

Per the EIR (2.0-5): "...this draft concludes that the proposed Project implementation would result in a SIGNIFICANT and UNAVOIDABLE daily mobile VOC's and NOx emissions during the operation of the proposed Project and cumulative contribution of VOCs and NOx emissions to the air quality within the South Central Coast Air Basin(SCCAB)." Significant and unavoidable are the key terms above. Per the EIR, this pollution issue is unable to be mitigated. 44-1

Per the EIR (2.0-9): "Of the alternatives considered in this section, the No Project/No Development Alternative is environmentally superior to the other alternatives, because this alternative would avoid the significant and unavoidable impacts identified for the proposed Project" 44-2

We are in a severe drought of unknown length. Saving water is crucial for all of us and the city has to lead by example. This projects will WASTE water, literally pouring thousands of gallons into the dirt. This is evident per Mitigation Measure MM 4.2.1 (page 4.2-29): Per the Dust Control Plan, "All ground surfaces with OHV activities (i.e.motor cycles, ATV's) shall be watered by an amended water agent to achieve minimum control efficiency of 84 percent." The EIR does not stipulate how much water dust control would require per day. 100 gallons? 10,000 gallons? Who will pay for this water? 44-3

Per page 4.2-31, "In the event the restriction of the number of OHV vehicles, the number of OHV races per hour, and the length of OHV events are determined to be infeasible with implementation of MM 4.4-2 then localized emission impacts would be considered ADVERSE, SIGNIFICANT, AND UNAVOIDABLE." What entity will enforce MM 4.2-2? At what cost? 44-4

RE: Sections 4.2 (Air Quality) and 4.10 (noise): These two vital EIR issues do not address the PREVAILING WINDS in Lompoc. Almost daily, Lompoc enjoys an afternoon Southeast wind. Sometimes it is quite strong.Because the project is located in the Northeast edge of the city, the prevailing winds will blow air pollution, particulate matter, and noise generated by the internal combustion engines over the populated areas of our city. Why was our prevailing wind direction not accounted for in the EIR? I could not find how our wind direction would impact the EIR's noise and air quality data. 44-5

Drag Strip Events (pages 3.0-30 and table 3.0-2): RE: speciality races - This table describes ten speciality drag race events per year, each 2 days in length, each day permitting 16 hours of drag race time at 25 races per hour. Per the math, that's EIGHT THOUSAND individual drag races in a 20 day window alone. The same mathematics applied to the Division finals weekends (50 hours at 25 races per hour) adds another 1250 races. 44-6

1

But, what's especially alarming, per page 3.0-30, "The Divisiion Finals Weekend, Specialty Drag Racing Weekend, and speciality Drag Race Events would be permitted to have OPEN EXHAUST AND OPEN HEADER classes." No mufflers; no headers. I strongly object to this proposal. 44-6

Per the EIR, one of the proposed purposes of the Project is to 'save lives." How will this project save lives? How many lives will be saved? Where is the data? In my opinion, this is a spurious contention. Per the LA Times (Aug 11, 2016, page B1) more than 200 Southern Californians die prematurely each year from polluted air (source is data from scientists at New York University and American Thoracic Society).Why approve a project that has all the ingredients to exacerbate additional air pollution deaths in our town? 44-7

The EIR says building the project will create the loss of critical habitat for a variety of nesting birds, animals, and plants. MM4.3-1 (page 4.3-42) addresses this issue by having Motorsport proponents restore 72.5 acres and maintaining the acreage over a five year period to ensure species survival. Once the project is completed, what motivation is there to ensure the survival of the new growth? Who will enforce this criteria and at what cost? Who will pay for the water to ensure growth of the various species? 44-8

Tables 3.0-1 and 3.0-2: Who decided these hours of operation? 9am to 10 pm seven days per week once the lights are in? I strongly object to these hours of operation. No one needs to drag race that often. At the very least, one day of rest please: no racing on Sundays! 44-9

Thank you, Ms. Breese, for this opportunity to express my concerns over the EIR and the proposed project.

Very Sincerely,

Dianne Burns
Lompoc resident

RECEIVED

AUG 1 2 2016

Planning Division

2

Breese, Lucille

From: Dianne Burns [forensicsdb@gmail.com]
Sent: Friday, August 12, 2016 11:44 AM
To: Breese, Lucille
Subject: Lompoc Motorsport Project Draft EIR.

Dear Ms Breese -
In section 4.2 /4.10 of my previous email to you, I incorrectly identified the location of the Project as being on the "Northeast edge of town." The correct location is the Northwest edge of town. This correction is significant in regard to pollution generated by the Project and wind direction. 44-10

Dianne Burns
Lompoc resident

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Planning Division

1

Letter No. 44: Dianne Burns, August 12, 2016

Response 44-1

See Response 40-3.

Response 44-2

The comment notes the Draft EIR discusses several alternatives to the proposed Project but raises no comments.

Response 44-3

Section 3.0, Project Description, of the Draft EIR notes the proposed Project would install 4-inch nonpotable water supply lines. The 4-inch lines would extend east to west across the northern and southern portions of the OHV area and along the Enduro Cross and Arena Cross areas, as shown in **Figure 3.0-10**. Additional 4-inch lines would extend north to south adjacent to the beginner's track and oval track, and along the east and west portions of the mud bog and sand drag lanes/Motorcross. A 2-inch potable line would travel east to west along the southern portion of the OHV area, with another 2-inch potable line extending north to the oval track. In addition, a water well may be drilled within the proposed Project site, at the sole discretion of the City, on property adjoining George Miller Drive and outside of the OHV area for nonpotable water needs.

As discussed in Section 4.14, Utilities, of the Draft EIR, nonpotable water from the on-site well would be used to control dust. Water consumption for dust watering was estimated assuming watering for 15 minutes every hour, and using the construction watering amount of 0.89 acre-feet/acre of water. The total area of the proposed Project that would need to be watered for dust control is approximately 11.77 acres which includes the OHV area comprised of the beginner's track, the oval track, the Enduro Cross and trials area, the Arena Cross area, and the motocross/mud bog and sand drag lanes. As shown in the Draft EIR Table 4.14.1-9, the proposed Project is estimated to have a yearly water demand for nonpotable water of approximately 252,000 gallons or 0.77 acre-feet.

Any connection to City water would require a water meter, and the operator of the site would pay for all metered water.

Response 44-4

The Draft EIR identifies a number of mitigation measures. If the City adopts the mitigation measures, then the City would be responsible for assuring the measures are completed as required by the CEQA Guidelines Section 15097 as noted below:

- In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.
- The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure.

Response 44-5

Atmospheric conditions to the degree relevant, are utilized in air quality and noise modeling.

Response 44-6

The comment notes the potential for the number of events at the drag strip if the proposed Project is approved but provides no comment on environmental issues. The comment also expresses opposition to the proposed Project and is noted.

Response 44-7

As stated in Section 3.0, Project Description of the Draft EIR, one of the proposed Project objectives is to reduce illegal riding in the Santa Ynez River bed and street racing. However, as with any illegal activities, one cannot fully preclude their potential.

Impacts associated with air quality are detailed in Section 4.2, Air Quality of the Draft EIR.

Response 44-8

See Response 44-4.

Response 44-9

The hours of operation listed in the Project Description of the Draft EIR are those proposed by the applicant. If the City decides to approve the proposed Project, then it can modify the hours and set forth any other conditions beyond mitigation measures with which the proposed Project must comply.

Breese, Lucille

From: WFasold@aol.com
Sent: Friday, August 12, 2016 6:31 PM
To: Breese, Lucille
Cc: WFasold@aol.com
Subject: Public Comment on Motorsports Park - EIR

I reviewed the EIR regarding the proposed Motorsports Park and see serious concerns which relate to the validity of data collected and the conclusions of this EIR. I will address one of these concerns which is the impact on noise to the surrounding area which impacts homeowners (both inside and outside city limits) and developers of land closest to the proposed park location. 45-1

There are fundamental flaws in noise level readings and chosen locations of those readings, assumptions made and stated impacts to noise levels in the surrounding region as follows:

1,. The study has used a baseline existing noise level which in no way represents or measures the impact to surrounding homes and neighborhoods. Measuring the noise level at a busy intersection is not relevant to the impact that would affect these areas. Independent actual existing noise level readings taken at various locations in Mesa Oaks and The Bluffs shows actual existing noise level that are far lower that the EIR model indicates.

2. EIR assumes that people keep their doors and windows shut and therefore the noise impact is not an issue. Anyone living in this area knows that assumption is totally invalid in this immediate area where people regularly have doors and window open to ventilate and cool their homes. 45-2

3. The noise level readings for various vehicles that would operate at the proposed park are totally out of league with established norms. The data collected appears to measure noise of engines operating under no load which can be many orders of magnitude lower than actual event conditions (operating under load). This is not valid data and these noise level readings need to be redone under load (operating conditions).

I find it inexcusable that whomever hired the consultant that performs the work and summarized it in the EIR is either very inept or is deliberately deceiving not only the public but also regulators with grossly inaccurate test assumptions, data and incompetent conclusions. 45-3

The EIR should be rejected for the reasons stated above and a demand be made to produce a factual and valid EIR. 45-4

Reject the EIR and do it over.

Walt Fasold
2845 Lewis Drive
Lompoc, CA 93436

RECEIVED

AUG 12 2016

Planning Division

1

Letter No. 45: Walt Fasold, August 12, 2016

Response 45-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 45-2

Section 4.10, Noise, of the Draft EIR provides a discussion of the potential impacts. In addition, please refer to Topical Response 7, Noise.

Response 45-3

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 45-4

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

10 August 2016

RECEIVED

AUG 12 2016

Planning Division

City of Lompoc
Economic Development- Planning Division
100 Civic Center Plaza
Lompoc, CA 93436

Attention: Lucille Breese, AICP, Planning Manager

Subject: Merdian Lompoc Motorsports Park Draft EIR (SCH No. 2015121005) dated June 2016

Dear Ms. Breese:

I have reviewed the reference DEIR for the Lompoc Motorsports Park, including all of its phases/alternatives and have found it incompatible with and a violation to the City of Lompoc 2030 General Plan, the Airport Plan, facilitating upside risks to the area's population and negatively impacts existing businesses that contribute to our local economy located near the proposed Motorsports Park site. Additionally, the noise studies included in the DEIR are inadequate and inaccurate in their conclusions. Therefore, the Motorsports Park project at this current site should be abandoned immediately. 46-1

Basis for abandoning this project are based upon the following:

1. **Lompoc 2030 General Plan Conservation and Open Space Element** includes polices to improve air quality in the Lompoc Valley, minimize emissions from vehicles, reduce Greenhouse Gas emissions, and minimize per capita consumption of nonrenewable energy sources within the City. 46-2

   -This project contributes to ***degrading*** air quality and ***increases*** emissions from all the activities associated with this project

   -***Increases*** GHG emissions

   -***Increases*** per capita consumption of nonrenewable energy resources

2. **The 2030 General Plan** also outlines that it shall ensure that the biologically significant habitats; including but not limited to those within and adjacent to the Burton Mesa Preserve, the Santa Ynez River, are to be ***preserved***, as defined in project-specific mitigation measures and that the City shall protect as open space, the Santa Ynez River and its tributaries, which serve as flood channels, wildlife habitats which are critical links in the Lompoc Valley's water supply and components of the City's unique urban form. The DEIR outlines the ***negative and irreversible impacts to the*** **environment** both ***wildlife***, including ***endangered*** species and fauna 46-3

3. **Lompoc Airport Master Plan and the Motorsports Park Project**

-This project is inconsistent with uses allowed by the Airport Plan. As outlined in the DEIR, the glare of the lights required for nighttime events at the Motorsports Park could be a hazard to pilots flying in by impairing their vision therefore possible causing a catastrophic incident. 46-4

4. **Undo Risk to Local Population and the Motorsports Park Project**

-Per the DEIR, a risk associated with fire hazard incumbent in the Motorsports Park. The DEIR outlines that the Lompoc Fire Department would be responsible for responding to hazardous chemicals and fire hazards. Our Lompoc Fire Department is under resourced to cover existing responsibilities and there is presently any specific plan to mitigate this issue. 46-5

5. **Economic Impact and the Motorsports Park Project**

-This project has a negative economic impact it does not facilitate economic growth. The DEIR is inaccurate in their assumptions. This project may cause the loss of jobs, eliminate an existing revenue (sales tax, TOT) stream into the City by negatively impacting an existing businesses. Additionally, the adjacent neighborhoods as well as one's in the development process could result in either reduced property values and/or slow sales (or fewer) of the new homes within the two projects at the "Y" as potential owners begin to learn of noise issue with this project. 46-6

6. **Noise and the DEIR Findings**

-The data presented with the DEIR as it relates to noise is inadequate and the summary of its impact is flawed. The sites chosen to collect noise samples are not representative of the neighborhood areas most closely impacted by the proposed Motorsports Project. The limited collection of data, confined to a single day during a very narrow period of environmental conditions is too small of a sample size to accurately reflect noise levels and their impact to the surrounding community. 46-7

In conclusion, based upon the City of Lompoc's own 2030 General Plan, the negative impact of this project the course of action is abandon it immediately. 46-8

Sincerely,

Timothy J. Harrington
1305 N. H St, Suite A PMB216
Lompoc, CA 93436

Letter No. 46: Timothy Harrington, August 12, 2016

Response 46-1

Section 4.9, Land Use, of the Draft EIR provides a discussion of the land use impacts of the proposed Project and its compatibility with the City's General Plan and ALUP.

Section 4.10, Noise, provides analysis of noise impacts and Topical Response 7, Noise provides additional information on consistency with the City's General Plan policies.

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 46-2

The commenter notes the Draft EIR addresses impacts associated with air quality impacts, greenhouse gas emissions and non-renewable energy resources. However, the comment provides no further comment regarding the analysis in the Draft EIR. The comment is noted.

Response 46-3

The commenter notes the Draft EIR addresses impacts associated with biological resource and consistency with the General Plan. However, the comment provides no further comment regarding the analysis in the Draft EIR. The comment is noted.

Response 46-4

Section 4.9, Land Use, of the Draft EIR provides a discussion of the land use impacts of the proposed Project and its compatibility with the City's General Plan and ALUP.

Please see Response 40-6 regarding lighting.

Response 46-5

Please see Response 35-5.

Response 46-6

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 46-7

Section 4.10, Noise, of the Draft EIR provides an analysis of impacts from noise. Also, Topical Response 7, Noise, provides additional information regarding noise methodology and consistency with the General Plan's policies

Response 46-8

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

8 August 2016

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AUG 12 2016

Planning Division

City of Lompoc
Economic Development—Planning Division
100 Civic Center Plaza
Lompoc, CA 93438-8001

Attention: Lucille Breese, AICP, Planning Manager

Subject: Lompoc Motorsports Project Draft EIR (DEIR)

Reference: Meridian Lompoc Motorsports Park Draft Environmental Impact Report (SCH No. 2015121005) dated June 2016

Dear Ms. Breese,

I reviewed the referenced DEIR for the Motorsports Park, including all of its phases/alternatives, and have found it incompatible with and a violation to the city of Lompoc 2030 General Plan, the Airport Plan, putting undue risks to the population and negative impacts ongoing businesses located near the proposed Motorsports Park site. In addition the noise studies included in the DEIR are inadequate and its conclusions are inaccurate. As such, the Motorsports Park should be immediately abandoned. 47-1

Lompoc 2030 General plan and the proposed Motorsports Park
The City of Lompoc 2030 General Plan Conservation and Open Space Element includes policies to improve air quality in the Lompoc Valley, minimize emissions from vehicles, reduce GHG emissions, and minimize per capita consumption of nonrenewable energy resources within the City. 47-2

- The motorsports park ***degrades air quality*** and increases ***emissions*** from the racing vehicles (all types) and the vehicles attending events
- The motorsports park ***increases GHG*** emissions
- The Motorsports Park ***increases per capita consumption of nonrenewable energy resources***.

In addition, city of Lompoc 2030 General Plan also outlines that it shall ensure that the biologically significant habitats, including but not limited to those within and adjacent to the Burton Mesa, the Santa Ynez River, ... ***are preserved***, as defined in project-specific mitigation measures; It further states that The City shall ***protect, as open space***, the Santa Ynez River and its tributaries, which serve as flood channels, wildlife habitats, critical links in Lompoc's water supply, and components of the City's unique urban form. 47-3

- The DEIR outlines the ***negative and irreversible impacts to the environment*** both wildlife, including endangered species, as well as fauna

- The proposed Motorsports park and all of its alternatives ***destroys open space*** 47-3

Lompoc Airport Master Plan and the proposed Motor sports park

The use of a Motorsports park, located in an area covered by the Lompoc Airport Master, is inconsistent with the uses allowed by the Airport Plan. The DEIR outlines that the glare of the lights required for the Motorsports Park may likely cause a hazard to pilots by impacting their vision. Impacting a pilot's vision could lead to a catastrophic incident. 47-4

Undo Risk to Population and the proposed Motorsports Park

The DEIR outlines a risk associated with fire hazard incumbent in a Motorsports Park. It outlines that the Lompoc Fire Department would be responsible for responding to hazardous chemicals and fire hazards. The Fire Department is under resourced to cover its existing responsibilities let alone assume more which leaves the public at risk. 47-5

Economic Impact and the proposed Motor sports park

The DEIR inaccurately outlines that the proposed Motorsports Park will contribute to economic growth when the reverse is true. Implementation of the proposed Motorsports Park will cause a loss of jobs and revenue (sales tax) by negatively impacting ongoing profitable businesses. One business has already stated that it would have to relocate its operations if the Motorsports Park is approved due to its negative impact to ongoing operations. Customers of this business also patronize other Lompoc businesses with a exponential collateral benefit which would be lost if the business would relocate. Other businesses and neighborhoods close to the proposed Motorsports Park have outlined that they too would be negatively impacted. 47-6

Noise and the DEIR

The noise data presented in the DEIR is inadequate and the summary of its impact is inaccurate. Sample sites selected are not representative of the neighborhood area most closely impacted by the proposed site. In addition, samples were taken on a single day during a very limited period where a more robust study would have taken measurements in a variety weather conditions, including fog, over an extended period of time. 47-7

In summary, based on the city's own 2030 General Plans, the negative impact the environment and ongoing businesses, and the undue risks to the people of Lompoc, the proposed plan for the Motorsports Park should be immediately abandoned. 48-8

Sincerely,

Lucy Thoms-Harrington

Lucy Thoms-Harrington
1305 North H Street Suite A PMB 216
Lompoc, CA 93436

Letter No. 47: Lucy Thoms-Harrington, August 12, 2016

Response 47-1

Please refer Response 46-1

Response 47-2

Please refer to Response 46-2.

Response 47-3

Please refer to Response 46-3

Response 47-4

Please refer to Response 46-4

Response 47-5

Please refer to Response 46-5

Response 47-6

Please refer to Response 46-6

Response 47-7

Please refer to Response 46-7

Response 47-8

Please refer to Response 46-8

RECEIVED

AUG 12 2016

Planning Division

Lucille Breese, AICP

City Of Lompoc

100 Civic Center Plaza

Lompoc, Ca 93436

August 12, 2016

Dear Ms. Breese:

In reviewing the Draft EIR for the Motorsports Park, we find several areas to be inaccurate and incomplete. We believe this document should not be adopted by the city without major revisions. Several areas fail to address our concerns. The following subjects have not been addressed or are not able to be mitigated resulting in an incomplete assessment of the proposed project: 48-1

1) The noise Study says there are no noise issues to mitigate. This is inaccurate as their own data shows the project fails to satisfy the 2030 General Plan Noise Policy because it fails the following:
   a. Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards".
   b. Policy 2.3 states "The city shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."
   c. Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The noise Ordinance establishes noise limits that cannot be exceeded at the property line." 48-2

   Personal comments: The issue we have is that no recording devices were set up in any of the residential areas surrounding the proposed site. What a major oversight. Moreover, with the expected 500 RV parking spots set for the park, we can expect the generators on those RVs to add to the noise pollution, even after the "park" is closed for the night. In addition, there is currently, and in the past has been, circuses, such as Circus Vargas, that use the area by Wal-Mart. Last night, we could hear the music, announcer, and cheers from the crowd. We expect the noise level from multiple dirt bikes running on the courses, and 500 plus RVs running their generators to be making more noise than that and any given day.

2) The city will need to address issues raised by the Santa Barbara County Association of Governments (SBCAG) and the Federal Aviation Administration (FAA), as group recreation areas are "incompatible uses" for areas next to active runways after adopting the Draft ALUP. 48-3

3) Per the DEIR, "The daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason" (pg 4.2-31 of the DEIR.) This means operating the park will make air quality demonstrably worse and reduce the quality of life for all the community. 48-4

   Personal comments: I suffer from allergies already found in the air here in Lompoc. The dirt, dust, and fuel/exhaust gases are going to further worsen my condition.

4) It was noted that the park with use 5% of the water resources the City has. Driving thru Lompoc you can see the results of several years of drought with many dead lawns and dying trees. They want to waste valuable water resources to make "mud bogs" and dust control over 6-7 day a week operation. If they are planning on reducing dust by wasting water, then they should realize that the daily use will generate significant levels of dust particles into the surrounding neighborhoods. 48-5

5) And finally there is the issue with ongoing park maintenance. We understand that the park has 40 some volunteers to help maintain the facility. What happens when the "labor of love" to have this park becomes an overbearing burden on those 40 people? What is the average "life span" of volunteers in any project? Let's fast forward a few months/years into the future. The paths are now well eroded, and when the rains do come back, those ruts will wash away. Who is going to be paying for the renewal of the track, we, the citizen of Lompoc, that's who. There are many additional issues that we have against this project and sternly suggest that this stops here and now. If they have to replace the trees, bushes, and other things this will cause to happen, where do they get that land to replace? Why don't they build their park on that property, and keep it outside the city neighborhoods were hundreds of people call home. 48-6

Sincerely,

Wayne Maza

Lorena Maza

629 Northbrook Drive

Letter No. 48: Wayne and Lorena Maza, August 12, 2016

Response 48-1

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 48-2

Please refer to Response 17-1 and Topical Response 7, Noise.

Response 48-3

Section 4.9, Land Use, of the Draft EIR provides analysis of the various land use plans that are applicable to the proposed Project. The Draft ALUCP has not yet been adopted; therefore, the proposed Project is not required to comply with the proposed safety requirements. Even if the Draft ALUCP were to be adopted, State law authorizes the City Council to override any regulation in the ALUCP that may be inconsistent with the City's General Plan, with which, the proposed Project is consistent. Impacts would be less than significant with the existing Airport land use plans.

Also please refer to Response 17-2 and Topical Response 5 for a discussion on land use compatibility.

Response 48-4

Please refer to Response 17-3. Section 4.2 of the Draft EIR evaluated impacts to air quality. The Draft EIR looks to inform decision makers of the impacts of a Project on the environment. Lead agencies have the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project.

Response 48-5

Section 4.14.1, Water Service of the Draft EIR analyzed impacts of the proposed Project on water resources. The proposed Project's sources of water, water supply, and demand quantities is based predominantly on the City's 2010 Urban Water Management Plan (UWMP), the City's Groundwater Management Plan, and the City General Plan. The City's UWMP contains the current and future availability of water resources within the City based on land uses. As discussed in the City's 2010 UWMP, the commercial, institutional, and industrial sectors are projected to increase water demand approximately 146 acre-feet per year (afy) over the next 20 years (this is being updated in the 2015 Urban Water Management Plan).[4] The proposed Project's 7.95 afy would account for approximately 5 percent of the

4 The total projected 146 afy water demand increase includes the 137 afy increase from the commercial and institutional sector and the 9 afy increase industrial sector.

increase in projected water demand in the commercial, institutional, and industrial sectors over the next 20 years. Therefore, the City has adequate water supplies to meet the demands of the proposed Project.

Response 48-6

Section 3.0, Project Description, of the Draft EIR provides a discussion of the proposed Project and diagrams of the proposed facilities. Any construction would be subject to building permits to be issued by the City. Regardless of whether contractors or volunteers did the work, the conditions identified in any permits would apply.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

CAROL REDHEAD
2302 MARAVILLA LOMPOC, CA 93436
AUGUST 11, 2016

RESPONSE TO EIR AND THE PROPOSED MOTORSPORTS PARK
AND LOMPOC CITY DRAG STRIP

RECEIVED
AUG 12 2016
Planning Division

TO THE CITY OF LOMPOC
ECONOMIC DEVELOPMENT-PLANNING DIVISION
100 CIVIC CENTER PLAZA
ATTENTION: LUCILLE BREESE, ALCP, PLANNING MANAGER
PHONE: (805) 736-1261

EMAILED TO MS BREESE AT L_BREESE@CI.LOMPOC.CA.US August 11, 2016

ATTENTION: THE CITY COUNCIL, THE CITY MANAGER, THE CITY ATTORNEY, AND ALL CONCERNED WITH THE PROPOSED LOMPOC MOTORSPORTS PROJECT DRAFT EIR
THE CITY OF LOMPOC, CALIFORNIA

Before I give my reasons for opposing a city drag-race track and motor cross dustbowl, I wish to express the reasons I lately moved to this town of Lompoc. First a question to you: which of you spent 54 YEARS working each and every day, week after week, month after month, YEAR AFTER YEAR, saving enough to finally be able to purchase a home? With the mortgage paid off? While raising children and caring for a family? *I* worked those 54 years, raising my family, and finally was able to pay off my mortgage and retire.

I have lived in many cities, including Santa Barbara, where my family moved in 1949, a lovely open city with a river running through it, and people like Leo Carrillo and Monty Montana who rode in the Fiesta parades, then we moved to the new city of West Covina, an agricultural town of walnut and orange groves, then after marriage to Fountain Valley, the land of small farms. Unfortunately, over the years every one of these cities morphed into unrecognizable places. The towns I had lived in all became impersonal, terribly crowded, those beautiful and productive farms had sadly been razed and cemented over to create monstrous freeways, some with twelve lanes one direction, twelve lanes the other! Millions of homes were built, jammed in, with no space to breathe, and people became isolated in their lives, not the friendly neighborhoods of the past. 49-1

During this transformation, problems occurred that eventually needed the government to step in to try to control and manage: traffic became a nightmare. Air pollution was so bad that children could not play out of doors and asthma became exponentially disabling to thousands. Noise abatement policies forced developers to further isolate the populace by building high block walls around whole neighborhoods. City councilmen and women, mayors, police and fire departments, the Air Quality Management District, the many water departments, the city engineering departments, Caltrans, and all the several others of those involved with managing these expanding cities, had more and more difficult decisions to contend with – and all of the problems only multiplied as time went on. Adding to the conundrum of management policies, homeowners and renters were forced each and every year to pay higher and ever higher taxes, which began the migration

CAROL REDHEAD
2302 MARAVILLA LOMPOC, CA 93436
AUGUST 11, 2016

of hundreds of thousands out into the desert areas, just to be able to afford a home in which to live. Of course, this now meant that instead of walking or driving a few minutes to work, the time spent on the road each day now turned into a mind-numbing one to two hours in each direction. Or more. As you can see, this is the price we pay for overdevelopment.

However, so far, this pretty, fairly isolated town has kept its rural character. This beautiful town is like magic to me, and I hope all who are lucky enough to live here appreciate the beauty and quality of life so horribly missing in so many other California cities! Lompoc is surrounded by thousands of unspoiled acres of forest, vineyards, and those heroic farmers and ranchers whose families have for many generations husbanded the soil on which they have provided the nation with sustenance. And we have Vandenberg Air Force Base and Space X, a small rural airport, a super thriving Sky Diving Business, and more companies providing jobs. Our local college, Hancock College is so highly rated throughout the nation that many students move here just to be able to attend the many diverse classes. 49-1

I missed the open spaces, the towns where everyone knew and cared about each other, where crops grew, and the best and hardworking farmers and ranchers lived and tilled and husbanded the soil. That is why, when searching for a better place to live, I came upon this jewel of a city, Lompoc. I spent 2015 searching for the perfect place to live, a town just like Lompoc! In the course of that year, I looked at dozens of homes located in the surrounding areas, finally finding the one I purchased. For many reasons, this is the perfect place! But now, after living here for only nine months, I find that some people want to put in a drag strip in the town! Who ever heard of such a thing? So here are reasons to reject the proposed drag strip and motor sport park:

REASONS TO DISAPPROVE AND REJECT THE DRAG STRIP AND MOTOR SPORT PARK:

According to the AIRPORT COMMISSION FINDINGS on the DRAFT ENVIRONMENTAL INVESTIGATION REPORT (DEIR), see the following findings:

A. It has been found by the Airport Commission (AC) that the nine-point list of PROJECT OBJECTIVES were dishonest, not factual, not adequate, and not complete and do not match any of the previously submitted information for the DEIR. 49-2

1. The project takes land away from the skydiving landing area. The decreased landing area would now contain many vehicles and participants, putting all of those directly in the line of parachutists landing, who may have no choice, due to wind variances, but to have to crash land into people, vans, cars, trucks, and other devises which have no place in a landing area. There would be a very high possibility of Very Severe Accidents, to both sky divers, but also to all others on the ground. 49-3
2. 40 acres of habitat will irretrievably be impacted, both flora and fauna – plants and animals, soil, river, geology would be changed forever, ruining the present form and functions that help make up and stabilize the region. 49-4
3. According to the proposed plan, traffic on George Miller Drive will prevent access to the airport. Both pilots, airport personnel, passengers, and emergency vehicles will all be hindered in gaining access to and from the airport. 49-5

2

CAROL REDHEAD
2302 MARAVILLA LOMPOC, CA 93436
AUGUST 11, 2016

4. It has been shown that air-born dirt and dust will inundate parked aircraft, taxiways, runways and hangars causing severe safety hazards to aircraft and people on the ground. 49-6
5. It is crucial that the city be aware of probable lawsuits to the city by the good citizens of Lompoc if this project goes forward. Homeowners have stated they will fight the project in court. This alone will place all Lompoc tax payers responsible for paying for any monies lost by the city. Homeowners would rather pay for a law suit than lose HUNDREDS OF THOUSANDS of dollars in loss of their property value. 49-7
6. Lompoc residents will not accept added noise, dust, traffic, crowds, from a drag strip in the middle of their small town. The drag races in Irwindale, California can be heard from as far away as West Covina – more than 10 miles away! 49-8
7. The proposed project is directly on airport property, not just next to it, causing multiple, and severe and crucial safety issues. This particular project directly and illegally places its location almost completely within the Lompoc Airport SAFETY ZONE, ZONE 5. This is unacceptable and inconsistent with existing California State and Santa Barbara County Airport Land Use Plans. The Caltrans ALUP handbook places Zone 5 requirements as "Prohibit Stadiums, group recreational uses". If you can imagine a stadium full of people, klieg lights, microphones, dust, vehicles, placed directly within the airport safety zone, in my opinion, this is a folly with accidents, really dangerous bloody accidents, even deaths just waiting to happen! How does a pilot discern the landing strip with all the other lights bouncing off the landing strip? How does a pilot hear directions to land with microphones blasting, mingled with the roar of engines on the ground? Ask the pilots – they do not like it. 49-9
8. Accordingly, this project is unlawful, dangerous, a nuisance, poorly planned, not popular with many citizens, except for the few. 49-10

I am against this project, and so are many homeowners. We know that if this project goes through our property values will plummet. The city council and mayor have heard from many citizens all the many reasons for stopping the project. When homeowners and renters lose property value, when realtors must disclose this project to future clients, the city will begin to lose its tax base. As properties lose value, homeowners can petition the county for lower tax bases, thus the city will see a drastic decline in revenues. Then there will be the cost of a class-action law suit. 49-11

How can a financially responsible city even consider such a "pie-in-the sky" project as a drag strip down the middle of this town? You must take time to see the unavoidable consequences lying in wait. You don't want to know what people in Orange County and Los Angeles are saying about the thought of this project! They've placed the proponents in an unflattering category. 49-12

Sincerely, Carol Redhead August 11, 2016

3

Letter No. 49: Carol Redhead, August 12, 2016

Response 49-1

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 49-2

The comment makes reference to comments made by the ALUC and is directed to the response to comments for that letter (see responses to Letter no. 6).

Response 49-3

Please Response 14-1.

Response 49-4

Section 4.3, Biological Resources, of the Draft EIR addresses impacts to habitat and vegetation. As noted in the Draft EIR, the approximate 38-acre proposed Project site contains approximately 29.7 acres of various vegetation types with 14.5 acres of habitat that requires mitigation. The Draft EIR includes mitigation (see MM 4.3-1 and 4.3-7) to address impacts related to the loss of vegetation and habitat subject to CDFW jurisdiction.

Response 49-5

As noted in Section 3.0, Project Description, of the Draft EIR, the George Miller Drive access point would be used for weekday access, private rentals for nonracing event access, and all emergency vehicle access to the proposed Project site. The V Street access point would be used for weekends, holidays, and special event access.

Access to the main airport would not be affected as the George Miller Drive access provides adequate access to the airport.

Response 49-6

Section 4.2, Air Quality, of the Draft EIR provides analysis of impacts associated with dust. Also see Response 13-1.

Response 49-7

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 49-8

The Draft EIR provides analysis of air quality (including dust) (see Section 4.3), noise (see Section 4.10), and traffic (see Section 4.13).

The comment regarding noise at Irwindale is noted; however, it has no applicability to the proposed Project.

Response 49-9

Please see Response 17-2.

Response 49-10

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 49-11

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 49-12

This comment, which expresses opposition to the proposed Project, is noted for the record and will be forwarded to the decision makers for review and consideration.

Breese, Lucille

From: Gallavan, Teresa
Sent: Monday, August 15, 2016 5:15 PM
To: Breese, Lucille
Subject: Fwd: My EIR Response,

RECEIVED

AUG 15 2016

Planning Division

Here is another

Sent from my iPhone

Begin forwarded message:

From: karen <kappeldorn@earthlink.net>
Date: August 15, 2016 at 4:54:53 PM PDT
To: "T_Gallavan@ci.lompoc.ca.us" <T_Gallavan@ci.lompoc.ca.us>
Subject: My EIR Response,
Reply-To: karen <kappeldorn@earthlink.net>

City of Lompoc
Teresa Gallavan, City Manager

Re: EIR Motorsports/OHV Park

To Whom it May Concern;

The EIR is lacking elements to help the City Council of Lompoc to make a viable decision in whether to procede with the OHV/Motorsports Park project with a Grant from the California State Parks OHV Division.

Currently, the media does not correctly state what the grant can and can not pay for regarding this recreational park, and it will not pay for anything involving vehicles with engines of any kind. Off Highway Vehicles (OHV) are meant for children to learn proper educational and safety skills. It is unclear to the public if the funds being spent appropriately, though I am assured there are different accounts for payments. The EIR cannot be paid for with public funds. 50-1

The Sound studies were not conducted in a manner conducive to learning whether or not the public could hear the noises from racing and throttling engines, though in other operational parks, they have decibel meters that can determine the level of noise on the spot. No studies appear to have been produced with many engines running and racing engines at top speeds could be hear even one mile away. In fact, it appears Lompoc has 50-2

1

not decided on any level of decibel acceptance appropriate to the public in the northern section of the city.

Without a level of acceptance, how would the authorities and experts know if levels have exceeded tolerance levels? Other larger cities have determined what would be Goodwill levels to neighboring areas, yet it appears no one has even thought to make any determinations. In this case, Noise is a concern when citizens and City Employees have no clue what is acceptable to all, and not just to a reporting crew for the EIR. 50-2

In addition, sound travels for miles and miles over concrete and land. In fact, it continues to reverberate and does not stop immediately. When one hears a loud sound, and the object(s) continue to make sound, a person is hearing repetitive sound which I a public health issue.

The Air Pollution levels cannot be mitigated. Not only would the park produce varying levels of unacceptable levels of toxic air pollution, autos and trailers traveling to Lompoc would produce emissions unacceptable to the area. The wind normally blows easterly, as it only blows towards the Pacific 3% of the year. For those already inhaling farming operation particles of any kind, added particulates are not acceptable under any circumstances. 50-3

The Santa Barbara Air Pollution District has for years refused to test, even for four hours, areas of concern for residents, so it is not likely they would test for any air pollution concerns if the park was built. This is very disconcerting.

The Grant monies is coming from our California State Parks fund for OHV sites, and the Mission of the Park system is: To provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its more valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. 50-4

The system is environmentally sensitive and attempts to preserve habitats, ancient Native American sites, and our cultural history. Off Road Vehicles at least remain on soil and attempt to keep things close to the Earth as possible, teaching our children to preserve and protect. 50-5

A Motorsports Drag Strip is not listed on any of the sites or information available to the public, in fact, land cannot be purchased with money from the grant for a drag strip. Is the City Council going to follow printed laws 50-6

2

already on the law books, or attempt to be pressured into another improper exploit with State funds for which the money disappeared? 50-6

Sincerely,

Karen Anastasio
1033 N B Ct
Lompoc, CA 93436

3

Letter No. 50: Karen Anastasio, August 15, 2016

Response 50-1

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social effects of a project s may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 50-2

Section 4.10 of the Draft EIR provides a discussion of impacts related to noise. Topical Response 7, Noise, provides additional information regarding the methodologies used to evaluate noise impacts.

Response 50-3

Section 4.9, Land Use, of the Draft EIR provides a discussion of the land use impacts of the proposed Project and its compatibility with the City's General Plan and ALUP. Air quality impacts are addressed in Section 4.3 of the Draft EIR.

Response 50-4

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2).

The Draft EIR provides analysis of potential impacts to biological resources (see Section 4.3) and cultural resources (see Section 4.4).

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 50-5

The Draft EIR provides analysis of potential impacts to biological resources (see Section 4.3) and cultural resources (see Section 4.4).

No further response is necessary because no issues related to the adequacy of the environmental impact analysis in the Draft EIR were raised.

Response 50-6

The proposed Project has been submitted by the Lompoc Valley Park and Pools Foundation and a portion of the proposed Project is being funded by the California Department of State Parks, OHMVR grant program (Agreement No. G12-03-73-D01). The grant provides for the completion of the environmental review process through CEQA for development of the OHV areas within the proposed Project (Phase 1) and construction of the OHV areas (Phase 2)

The comment is noted.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Breese, Lucille

From: Janet Blevins [janro48@gmail.com]
Sent: Monday, August 15, 2016 10:44 AM
To: Breese, Lucille
Subject: Proposed Motorsports Park DEIR

Ms. Breese,

The research used to calculate the Global Warming Potential of the proposed project is outdated. Using data and scientific understanding of global warming that is nearly a decade old is grossly insufficient. Up-to-date research shows that the expected consequences of adding more GHGs to the atmosphere are actually happening at a much faster rate than expected. The DEIR needs to use current data. 51-1

Thank you,
Janet Blevins
805-717-4160
Lompoc

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Letter No. 51: Janet Belvins, August 15, 2016

Response 51-1

Section 4.6, Greenhouse Gas Emissions, of the Draft EIR provides analysis of GHGs including the current site of GHG inventories and conditions. As noted in the Draft EIR, California is the second largest contributor of GHGs in the US and the 16th largest in the world. In 2012, California produced 458.68 million metric tons of carbon dioxide equivalents (MMTCO2e), including imported electricity and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 41 percent of the state's total GHG emissions. Electricity generation (both in and out of state) is the second largest source, contributing to 22 percent of the state's GHG emissions**.** The statewide inventory of GHGs by sector is shown in Draft EIR **Table 4.6-2, California GHG Inventory 2005–2013**.

Breese, Lucille

From: Janet Blevins [janro48@gmail.com]
Sent: Monday, August 15, 2016 1:11 PM
To: Breese, Lucille
Subject: Proposed Motorsports Park DEIR

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Ms. Breese,

The bottom of page 4.6-1 of the DEIR makes the statement that: "In California climate change may result in consequences such as the following:" and then goes on to list at the bottom of page 4.6-1 and top of page 4.6-2, eight consequences.
Of those eight, at least six are already happening. Therefore the use of the word, "may" is inaccurate at best and has me wondering if it is trying to be purposely misleading. 52-1

In addition, current statistics that relate to each of the listed consequences should be part of the report. For example, the number of wildfires in our state this season should be included in the report because increased wildfires is listed as one of the consequences of climate change. 52-2

Thank you,

Janet Blevins
Lompoc

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Letter No. 52: Janet Belvins, August 15, 2016

Response 52-1

Please see Responses 38-1 and 51-1.

Response 52-2

As noted in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, review of the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity maps indicates that the Project site is designated within the Local Responsibility Area (LRA) of an Unzoned Fire Hazard Severity Zone. According to the City of Lompoc 2030 General Plan Safety Element, the Project site is not located within a wildfire hazard zone.

The Draft EIR determined the proposed Project site is located within a "Moderate" wildfire hazard area. The proposed Project site would include an OHV component and drag strip component. Vegetated areas along the northern and northeastern boundary of the Project site would be cleared to minimize the "moderate" wildfire potential. Furthermore, no wildlands are adjacent to the proposed Project site, which is designated as a low-hazard area for wildland fire. Therefore, impacts related to increased fire hazards because of flammable brush would be less than significant.

As discussed in Section 4.11, Public Services, the proposed Project would implement an Incident Plan describing fire inspection and protection services to be provided for on-site motorsports events. The Incident Plan would be required to cover all potential public safety hazards associated with the scheduled events and would identify a detailed number of fire personnel and equipment to be provided in the case of an emergency. The implementation and compliance with the Incident Plan would reduce the risk of injury of damage from wildland fires to a less than significant level.

Breese, Lucille

From: Janet Blevins [janro48@gmail.com]
Sent: Monday, August 15, 2016 1:51 PM
To: Breese, Lucille
Subject: DEIR of proposed motorsports park

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Planning Division

Ms. Breese,

Race days at the proposed park would require the services of both the police and fire departments. Neither department has the manpower to serve this function. This fact needs to be considered and addressed in the EIR. 53-1

Thank you,

Janet Blevins
Lompoc

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Letter No. 53: Janet Belvins, August 15, 2016

Response 53-1

As discussed in Section 4.11.1 Fire Protection Services and 4.11.2 Police Protection Services of the Draft EIR, the proposed Project would have the potential to increase public service demands. However, prior to the OHV component, the Applicant shall coordinate with the Lompoc Fire Department to develop and implement an Incident Plan to reduce impacts related to fire protection services to a level of less than significant. In addition, the proposed Project would be required to develop a traffic control plan which requires detailed provisions for traveler information, a signage plan, traffic control personnel, and entry gate operations. As a result, the proposed Project would not degrade existing facilities provided by the Lompoc Police Department to serve the needs of the proposed Project.

Breese, Lucille

From: bryant billie [billiejohnbry@yahoo.com]
Sent: Saturday, August 13, 2016 9:39 PM
To: Breese, Lucille
Subject: motor sport

I have major concerns about the EIR not being done in the evening time when there's no more wind and all that pollution is going to sit, my son has health conditions I will be forced to move we move to Lompoc for the fresh air for him My home value will drop no one will want to buy a house and lusten to the noise. People move here to have quiet And I will get an attorney because this is not fair to the people who moved here to a quiet little area,if I wanted noise and excitement I would move to Los Angeles I live here for the quiet and the calm and the fresh air and then no smog This is going to make my house value worth nothing this is going to make The pollution sit here and we're going to breath it it's going to be very loud for my house which is on the other side of the river we hear the dog pound in the morning when the workers get there all the dogs bark for food and then when they get fed them they're quiet for the rest of the day and this is going to be constant and noise coming right at us pllus we're in a drought How can they possibly consider making mud when we're in a drought. So many people are going to sue it will end up being a multi million dollar law suite. Law suites shut the race track down south. Santa maria speedway struggles to stay open. And the people street racing will NOT pay to race.

54-1

54-2

54-3

54-4

Sent from Yahoo Mail on Android

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Letter No. 54: Janet Billie Bryant, August 15, 2016

Response 54-1

Section 4.3, Air Quality, of the Draft EIR discusses potential air quality impacts. The section also notes that a potentially significant public health standard would occur if the Hazard Index is more than 1.0 for non-cancer risk. For non-carcinogenic effects, the hazard index totaled less than one (8.5E-02 and 6.4E-02) for both the toxic 1 hour and 8-hour exposure scenarios. Therefore, non-carcinogenic hazards would be below the Hazard Index of more than 1.0 for non-cancer risk. Non-carcinogenic impacts would be less than significant.

Response 54-2

"Quality of life" is not a threshold identified specifically by the City for evaluation by itself.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 54-3

See Response 48-5 regarding water supply.

Response 54-4

See Response 54-2

August 13, 2016

TO: LUCILLE BREESE, AICP
CITY OF LOMPOC

FROM: STEVE DIETRICH

RE: STEVE DIETRICH COMMENTS
LOMPOC MOTORSPORTS PROJECT
DRAFT PHASE 1

RECEIVED
AUG 15 2016
Planning Division

The following are my personal comments related to the Draft Phase 1 Report issued for review June 24, 2016.

I. AIRPORT RELATED

a. Drop Zone

i. Review safety impact of moving drop zone east, closer to H Street. There are high voltage transmission lines west of the bridge and about 50-60 feet above the drop zone elevation.

ii. Discuss any safety issues from drivers on H Street, distracted by view of parachutes nearby.

55-1

b. Lighting

i. Show top of pole height above runway.

ii. Discuss FAA identified hazard of bright lights adjacent to runway with dark terrain ahead.

55-2

c. Bleachers

i. During the Airport Commission meeting Ed Mandibles discussed potential issues with the bleachers in their present location. It may be both an FAA issue and City liability issue. See FAA report on Mark Benjamin Citation crash at KSMO a few years ago where the airplane went off the runway after landing and into a hangar as an example of the exposure.

55-3

1

d. Parking

55-4

i. Verify with parking designer that 90 degree, pull through parking for vehicles with trailers will work efficiently with 25' aisles. If there is a conflict it may result in traffic backup.

II. NOISE

a. The FAA "noise footprint" exists to protect the FAA from lawsuits relating to noise, it is neither an expectation that noise levels will exist at that level nor a license for the motorsports park to expose the neighborhood to those sound levels. The discussion should be modified or eliminated.

b. There is no noise from Vandenberg other than an occasional missile launch or when the airshow takes place. Noise from the Lompoc Airport is minimal, especially in the evenings. The low overcast conditions and high IFR approach minimums typical of the area restrict arrivals most evenings

55-5

c. The background noise levels in the report are suspect as are the track noise levels.

i. Sounds from LHS football games and soccer games on the City field are clearly audible in the neighborhoods north of the City limits even though they are far more distant. This indicates that the projected background noise levels in the neighborhoods are probably overstated.

d. Reconcile other data on OHV's **and** race vehicles that indicate higher noise levels.

e. With OHV noise standards set at fixed RPM (or % of redline) specifications it is very possible for manufacturers to tune the intake and exhaust systems to have lower noise at a specific test RPM.

f. For an environmental impact review, the relevant noise level is the highest noise level at any rpm up to redline, under full load conditions.

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III. MITIGATION MEASURES

a. Sound mitigation measures

i. The mitigation measures should include automatic revocation of the CUP should the absolute noise levels or levels above ambient exceed the projected levels of any final EIR.

ii. In the event that a competition vehicle exemption is available under current noise standards for OHV, vehicles using the exemption should not be allowed. 55-6

iii. Provide multipoint monitoring systems with real time availability of information online similar to that used at Portland International Raceway. http://portlandraceway.com/?/about/noise_information

Note that the PIR is located in close proximity to the KPDX, the city's major airport serving commercial jets so the background noise levels are far higher than Lompoc

IV. PROCESS

a. Rather than simply responding to comments the City and its consultant should look at the methodology and assumptions used in several critical sections of the Draft EIR and incorporate any material changes to the plans into the analyses. 55-7

b. Based on the extent of the comments and changes in the project, the draft EIR should be re-circulated to provide interested parties the opportunity to comment on any changes in the project and critical reports, rather than proceeding to a final EIR . It is likely to be the shortest and least costly path to completion of the environmental process.

Letter No. 55: Steve Dietrich, August 15, 2016

Response 55-1

Please see Response 14-1.

Section 4.0, Land Use, of the Draft EIR notes reconfiguring the area currently available to skydivers would not result in significant impacts because the proposed Project is not requesting a reduction in size available to skydivers. In addition, the western proposed DZ (250 by 600 feet) would not result in a reduction in area for skydive landers. However, the relocation of the DZs increases the risk for "cutaways" or faulty chutes that have been detached to drift across active airport operation areas putting both the skydivers and aircraft at risk. Transient pilots, those who are not based or familiar with the airport, are of special concern to these risks as they may not be as familiar with the airport's operations, including skydiving, or its adjacent facilities.

Skydivers may also experience a higher amount of distractions as a result of the proposed Project by distractions from on-going motorsports activities at the proposed Project site; those distractions could also increase risk for accidents.

Response 55-2

As discussed in Section 4.9 Land Use of the Draft EIR, the tallest proposed light structure is 55 feet in height, with total elevation resulting in 125 feet above mean sea level (amsl). Those lighting structures would be located beneath the Airport's horizontal surface of 238 feet amsl; thus, there would be no impacts to the Horizontal Surface. However, the lighting structures would penetrate the Transitional Surface by approximately 18 feet (10 permanent standard bases approximately 200 feet from start of Transitional Surface) and 35 feet (5 lights approximately 75 feet from the start of the Transitional Surface) in addition to any overhang (such as light shielding, fixtures, etc.). Those impacts were identified as potentially significant within the Draft EIR. Mitigation Measure MM 4.9-1; however, conditions of approval would either restrict the height of all lighting standards so they do not penetrate the Transitional Surface, or would have the Applicant submit all structures to the FAA for review and approval.

Please refer to Topical Response 1 regarding airport safety. As discussed, the proposed Project lights would be shielded and focused downward to meet FAA standards; the fixed light towers would also have aircraft warning lights atop each pole. All outdoor lighting would comply with the Title 24, Part 6 of the California Code of Regulations, Energy Efficiency Standards for Nonresidential Buildings. The proposed Project's lighting would be cleared by the FAA; therefore, safety impacts related to lighting features would be less than significant.

Response 55-3

Please refer to Response 49-2.

The City will be responsible for site plan review to assure parking areas meet City design requirements.

Response 55-5

The comment makes general observations to other noise sources and provides no comment on the analysis presented in the Draft EIR.

Response 55-6

The comment provides a suggestion for noise monitoring. The Draft EIR analysis indicated the construction and operation of the proposed Project would not exceed City standards (see Topical Response 7, Noise for additional clarification). Accordingly, no mitigation measures were required to reduce potential noise impacts. The City can decide as a condition of approval to include a provision for future noise monitoring.

Response 55-7

CEQA requires Agencies to "review, evaluate, and prepare written responses to comments on environmental issues received on an EIR" (CCR Section 15088).

Topical Response 7 provides additional information on methodologies used to evaluate noise impacts.

Recirculation of the Draft EIR is only required by CEQA when "significant new information" is added to the Draft EIR, such as, changes in the project or environmental setting or newly proposed mitigation measures. The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Breese, Lucille

From: Michael Donohue [md@mdonohue.net]
Sent: Sunday, August 14, 2016 7:23 PM
To: Breese, Lucille
Cc: 'Patricia Elkaim'
Subject: Comments to Lompoc Motor Sports EIR,

RECEIVED
AUG 15 2016
Planning Division

Ms. Breese,
Please find my comments to the EIR. I assume that this email will become part of the public record as required by law. If there is an issue with this please let me know so I can reformat it.

Land Use/ Planning:
The use of the Airport property is in contravention to the designated use and as such is unlawful. The issues around habitat mitigation alone are insurmountable given the designated use of the property versus the desired use by the Motor Sports Park. The EIR does not consider simple but mandated guidelines that will trigger lawsuits and stop the project. The project is at odds with 900,000 square foot business park that was approved and that is adjacent. It is at odds with hundreds of residential zoned HOMES, some within 200 YARDS. Noise will ruin the values of our homes including 800 new homes planned at they "Y." Builder above S.M. raceway could not sell his project for YEARS because of location. Ruination of the local economy will result with homeowners selling at losses and tourists staying away from our scenic valley. 56-1

Noise:
a) The EIR report paid for with taxpayer funds is a FARCE and a FRAUD. A tiny number of mufflered autos was used in the "noise survey," not the kind of engines that will actually be used.
Meridian MUST be required to decibel test 100 motorcycles, siderails and race cars. Meridian should be held to account by its state licensing agency. City Staff at EIR scoping meeting promised LVNA that we would be notified of the event. No notification was given. Who was present as the mufflered autos were sounded? 56-2
b) Noise from ambulance sirens to attend to injured is not mentioned. Neither are fire engines and HAZMAT teams who will clean up after inevitable engine fires or accidents.

IT IS A WELL KNOWN FACT THAT SANTA MARIA RACEWAY CAN BE HEARD WELL INTO NIPOMO AND ORCUTT. VENTURA RACEWAY WELL INTO CASITAS SPRINGS. MILES AND MILES AWAY. Nearly every "park" has been the subject of intense litigation in the California region. Homeowners WILL NOT PUT UP WITH THE NOISE AND COMPLETE DISRUPTION OF THEIR QUALITY OF LIFE. Lawsuits will be filed and some home owners will sell and leave rather than have their property values decrease.

Public Services/facilities
a) How will sewage be handled for the 1,250 spectators?
b) Where will the overflow of RV's go? Lompoc lacks RV facilities. Do not deteriorate our HOA ruled neighborhoods that have worked so hard for DECADES to protect our QUALITY OF LIFE. We save the city money by operating our own systems. 56-3
Yet the city is trying to destroy our work with the construction of this menace to everything that is good about Santa Barbara County living.

Recreation:
a) Nearby Santa Maria is the place for proponents to "recreate."
b) This "park" will cause the ruin of Santa Barbara Skydiving, a true recreational opportunity. A smokeless source of tourism and revenues. c) "Park" will destroy recreational virtues of the peace and quiet of the hiker at BURTON MESA PRESERVE and pristine OCEAN PARK. IT WILL BE HEARD IN THESE PLACES WITH VOLLEYS OF NOISE OFF OUR CANYON AND HILLSIDE RIMS. 56-4

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c) It was stop the development of best in class soccer fields that would bring in soccer clubs from all other areas of California. 56-4

Toxic/Hazards:
a) Smog emissions from pre smog cars are a fact.
b) THIS SITE HAS FLOODED MANY TIMES THROUGHOUT THE YEARS.
c) WHO WILL STOP DOZENS OF PORTA POTTIES UPON FLOODING--FLOWING DOWN THE SANTA YNEZ RIVER? WHO WILL PAY THE EPA FINES THAT WILL RESULT IN LIABILITY TO THE TAXPAYERS OF LOMPOC? ALL structures must be removed on the issuance of a "flood alert." How will proponents see to that when they can't live up to the contractual end of bargains--they fail to live up to contractual and financial arrangements with the city in this five year BOONDOGGLE.. 56-5

Traffic/Circulation: The "Y" left lane at 132 that will be utilized by south coast "park" users is ALREADY OVERLOADED DURING THE DAY. Traffic spills over into VAFB bound lanes. A Hazardous situation!
Emergency vehicles will be IMPEDED. Has the CHP or Fire weighed in? NOTE: Vehicles with trailered race vehicles will overload it THREE TIMES as quickly. b) "V" street intersection needs pedestrian and general improvements for the 4000% increase in daily car trips. 56-6
Utilities/Service Systems: Approved sewage plans for thousands of users? Where are they? 56-7

THIS EIR NEGLECTS GENERAL SAFETY CONCERNS: Lighting will impair NIGHT TIME LANDINGS (EMERGENCY AIRCRAFT at contiguous runways.) What of IMPACT ON parachutist landing zones? IMSA reports dramatic increase in fatalities at "volunteer run ovals' such as this. (see 2012 report) Aesthetics/Visual: 56-8
a) Sun reflection on hundreds of windshields of RV's, hundreds of parked cars will ruin views from many angles of vision.
b) Dust clouds will impair vistas from all angles.
c) Some users bring semi-truck trailers to these facilities with welding facilities that will add to the visual blight d)Night star views will be impaired by stadium like lighting. Type of lighting not clearly delineated in study. 56-9

Air Quality:
a) Many Lompoc residents have illegally converted emissions devices on their cars. These cars already race on our streets. This is your typical user of "park." Air Resources Board is so notified by LVNA.
b) Tire fires will occur.
c) Hundreds of visitors vehicles will be added to our valley.)MOST side rail users in the mud bog will employ PRE SMOG Volkswagen engines. THESE ENGINES HAVE NO SMOG DEFLECTION EQUIPMENT AND POLLUTE 100X more than one MODERN CAR. There will be hundreds of these vehicles operating twelve hours a day 365 days a year. WHAT DO PROPONENTS SAY ABOUT THEIR 'SPECIAL EVENTS DAYS.' This 56-10
report does not address that and is therefore CANNOT BE CERTIFIED. IT IS INCOMPLETE. Were the type of engines delineated in this EIR report?

Biological Resources: Pollution of soil and run off into riparian habitat will impact willows and other protected species of all types down river and contiguous. See endangered species list for this environmentally sensitive area. 56-11

Cultural Resources: Will downgrade the general environment-- particularly planned space museum. Is it harder to concentrate on any matter with EXCESSIVE NOISE. Studies say YES. Loud cars don't mix with the stars.... or the study of the heavens. 56-12

Geology and soils: Soils will become polluted quickly. Will affect all matter of plant life. Banks of river will be impacted by grading for track. By volunteers? 56-13

Greenhouse Gas: Effect on carbon footprint is obvious with the use of many pre-smog or illegal vehicle emission systems. 5-10% of Lompoc autos are illegal according to LVNA studies.. 56-14

2

Hydrology/water quality:
a) Lompoc Valley relies on aquafers for drinking water. "Park" will add to the degradation of our water sources. The Santa Ynez River will be impacted; negatively. Efforts to bring back steelhead trout to Santa Ynez River will be denigrated.
b)California under extreme drought condition. Construction of "mudbog" insures that MORE water will be wasted....more burdens will be placed by Sacramento on Lompoc residents.

56-15

All the Best,
MD

Michael Donohue & Associates
Telephone: 310-384-3537
Email: md@mdonohue.net
Skype: mdono77
Twitter: mdono77
"information is the currency of change"

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Letter No. 56: Michael Donohue, August 15, 2016

Response 56-1

Please refer to Topical Response 5 regarding land use compatibility.

As discussed in Section 4.9, Land Use, of the Draft EIR, the proposed Project is consistent with the appropriate land use designation and meets the City's zoning requirements. According to the City's General Plan Land Use designation the proposed Project is located within Community Facilities and zoned for Public Facility uses. Public Facility areas are currently located next to various residential communities within the City and border the Lompoc Airport; therefore, the proposed Project's zone classification and location would be consistent with existing conditions.

Response 56-2

Please refer to Topical Response 7 for additional information regarding the methodologies used to evaluate noise from drag strip operations.

Response 56-3

As discussed in Section 4.14 Utilities and Service Systems of the Draft EIR, restrooms will be provided by portable toilets. All wastewater will be collected on site from restrooms and concessions and trucked off site for disposal at approved disposal facilities. Most likely, wastewater would be transported and treated at the City-owned Lompoc Regional Wastewater Reclamation Plant (LRWRP), which provides primary, secondary, and tertiary treatment for wastewater. The LRWRP meets the requirements set forth by the RWQCB and no upgrades or changes would result from the proposed Project.

As noted in the Draft EIR, Section 3.0, Project Description, a centralized parking area, which would be shared by both the OHV area and the drag strip, would be built concurrently with the OHV area. The proposed parking areas would accommodate approximately 1,120 spaces (523 spaces in the main parking area, 159 spaces for OHV parking, 356 spaces for pit area parking, and 80 spaces for drag strip parking). ADA accessible spaces would be provided in each area with 9 spaces provided for the OHV area, 5 for the pit area, 2 for the drag strip, and 30 accessible spaces in the drag strip parking area. Overflow parking of 160 spaces would be provided for OHV events on the drag strip when the drag strip is not in use. Overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed; so all RVS would be required to be self-contained. Because the Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use.

Response 56-4

Please see Response 14-12 regarding Skydive Santa Barbara, and Response 13-3 regarding alternative sites considered.

As discussed in Section 4.12 Recreation of the Draft EIR, the proposed Project would be fully self-contained and is considered a recreational operation separate from existing parklands.

As discussed in Draft EIR Section 4.10 and clarified in Topical Response No. 7, Noise, the proposed Project would not result in substantial increases in ambient noise levels in the area. The OHVs are subject to state law to meet maximum noise levels. Those noise levels were analyzed in the noise analysis and determined that noise impacts would be less than significant.

The proposed Project would not preclude the development of soccer fields within the City.

Response 56-5

Please see Response 40-4 and Topical Response 3, Hydrology.

Response 56-6

Section 4.13, Traffic and Circulation, of the Draft EIR includes analysis of the potential traffic related impacts. The analysis takes into consideration the types of vehicles that will use the site, including trailers.

The Draft EIR was circulated to State agencies via the State Clearinghouse. The California Highway Patrol did not provide any comments.

Response 56-7

As discussed in Section 4.14, Utilities and Service Systems, of the Draft EIR, restrooms will be provided by portable toilets. All wastewater will be collected on site from restrooms and concessions and trucked off site for disposal at approved disposal facilities. Most likely, wastewater would be transported and treated at the City-owned LRWRP, which provides primary, secondary, and tertiary treatment for wastewater. The LRWRP meets the requirements set forth by the RWQCB and no upgrades or changes would result from the proposed Project.

Response 56-8

Sections 4.1, Aesthetics, and 4.9 Land Use, of the Draft EIR discuss requirements by FAA for lighting. As noted in the Project Description, Section 3.0, lights would be shielded and focused downward to meet FAA standards; the fixed light towers would also have aircraft warning lights atop each pole. All outdoor lighting would comply with the Title 24, Part 6 of the California Code of Regulations, Energy Efficiency

Standards for Nonresidential Buildings. The proposed Project's lighting would be cleared by the FAA; therefore, safety impacts related to lighting features would be less than significant. In addition, the proposed Project would have a negligible effect on Airport accident risks because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the Airport.

Please refer to Topical Response No. 1 regarding Airport Safety.

Response 56-9

Section 3.0, Project Description, of the Draft EIR notes drag racing events would begin after 9:00 AM and would end by sunset until the lights are installed, and would end at by 10:00 PM after the lights are installed. Local drivers for local drag strip events would drive their street legal vehicles to the strip, and semi-professional and professional teams would bring one or more vehicles and trailers.

Section 4.1, Aesthetics, of the Draft EIR, notes sources of glare would include vehicles traveling to the proposed Project site and from the permanent maintenance and storage building and temporary structures. The permanent and temporary structures would adhere to standards set forth in the development plan as required by the Public Facilities zone. The parking areas would include materials to soften off-site glare, including wood chips and decomposed granite. The existing vegetation surrounding the proposed Project site would limit off-site glare impacts from the motorsports uses. Therefore, potential glare impacts would be less than significant.

Response 56-10

As noted in the Draft EIR, all vehicles will need to utilize original manufacturers equipment and no "after-market" changes.

Section 4.2 of the Draft EIR provides analysis for air quality impacts and identifies mitigation.

Response 56-11

Section 4.3 of the Draft EIR provides analysis for biological resources. It also identifies what habitat may be lost and suggests mitigation for lost habitat (see Mitigation Measure MM 4.3-1 and Mitigation Measure MM 4.3-7).

Response 56-12

The comment indicates concerns about stars and heavens but provides no information on potential impacts to cultural resources.

Response 56-13

While the comments topic suggest geology, it expresses concern regarding the potential impact to soil from stormwater runoff.

The proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application. Compliance with these requirements would result in less than significant water quality impacts to the river.

See Response 16-4.

Response 56-14

The Draft EIR provides analysis of greenhouse gas emissions in Section 4.6. Impacts were determined to be less than significant.

Response 56-15

See Response 16-4.

Breese, Lucille

RECEIVED

AUG 15 2016

Planning Division

From: Linda Gooch [lindagooch@mac.com]
Sent: Sunday, August 14, 2016 8:50 PM
To: Breese, Lucille
Cc: Breese, Lucille
Subject: Important Motorsports Park Input

Dear Mayor and City Council Members,
I do not usually write letters like this, but I just couldn't let this deadline slide without speaking up because I feel so strongly about it.
I respectfully plead that you do NOT go ahead with the Motorsports park plan.
As a longtime homeowner here in Lompoc I am very upset about you going this far with it. I was so relieved and thankful to the mayor when it got voted down before. I thought it was over and then all of a sudden you people have it back on the agenda! WHY? 57-1

No matter what this small-but-vocal group of drag strip lovers says, it is NOT what the MAJORITY of Lompoc citizens want. Believe me, I have heard a LOT of comments about this. It is not a good idea for Lompoc. Especially in that location - the city owned property at the Lompoc Airport.
I would think that should be left alone as a buffer zone for the airport if nothing else, but it is also been stated that it is part of the area used for the already established skydiving business. We do not want the skydiving company to have to move to another community! We like them. They have been a wonderful clean and quiet business for Lompoc. They bring in the right kind of people that spend money in our nicer restaurants and hotels and wine tasting areas (which I believe we are trying to promote.) We don't want them to leave. Why would you intentionally mess up one very popular non-obtrusive business to let in something like this which may or may not make it? If these people want a drag strip etc. why don't they find a place of their own that won't be offensive to so many citizens. 57-2

The drag strip events are going to be run by volunteers. What happens if they get tired of it all and no one wants to continue on with it? You know how it is getting and keeping volunteers. Are they going to tear it all down and put it back the way it was and pay the city back? I don't think so. Lompoc will again be the loser. And even though they have their own insurance, if there are accidents there will probably be large lawsuits that include the City of Lompoc. 57-3

Also I cannot even imagine why this would be approved right next to the riverbed. Just because we are in a drought does not mean that we will not have another flood year. 57-4 And environmentally, how can this even be justified? This can't be good for the wildlife habitat. With all of the rules and regulations people have to go through to try to just build something on their own property these days with endangered species and habitats etc., how could you possibly approve something like this right next to the riverbed? 57-5

I don't care what they say in their side of the story, it will be noisy. It's a valley. It will be heard all over. We can hear when a car or motorcycle is loud in our neighborhood and then continue to hear it for blocks way across town. And they plan on hundreds of events per year - some of which will go on late at night and even all weekend? There goes our peaceful valley. 57-6

That's one of the things at least that Lompoc had going for it. A beautiful peaceful valley with flowers and murals and vineyards. Cool breezes and fresh air... That's why we are here. I do not think that this will enhance our image in the county. 57-7

PLEASE, PLEASE do not go ahead with this.

1

Linda and Tom Gooch
317 South G St
Lompoc, Ca

2

Letter No. 57: Linda and Tom Gooch, August 15, 2016

Response 57-1

This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 57-2

Please see Response 14-1.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 57-3

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Response 57-4

As discussed in Section 4.8, Hydrology of the Draft EIR, the proposed Project is located within a 100-year flood hazard area as indicated by the City's General Plan. Topical Response No. 3, Hydrology provides further clarification with respect to potential flooding impacts on the site. As discussed in Section 3.0 of the Draft EIR, the elevation of the proposed Project site would remain consistent with existing elevations on the site. Proposed Project design would adhere to the City's Building and Safety Code and the current edition of the CBC during construction and operation to reduce potential flooding impacts on- and off-site. Per Goal 2 of the City's General Plan, Safety Element, the proposed Project would comply with development requirements within the floodway fringe. Therefore, impacts would be less than significant.

Response 57-5

Section 4.3, Biological Resources, of the Draft EIR provides a discussion of the impacts to biological resources.

Response 57-6

Section 4.10, Noise of the Draft EIR provides a discussion of potential noise impacts. In addition, please refer to Topical Response 7, Noise.

Response 57-7

This comment is noted for the record and will be forwarded to the decision makers for review and consideration. The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR; therefore, no further response is necessary.

Lucille Breese, AICP

City of Lompoc

100 Civic Center Plaza

Lompoc, CA 93436

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AUG 15 2016

Planning Division

Dear Ms. Breese,

I am writing this letter to complain about the inaccurate statements in the Draft EIR for the Motorsports Park. 58-1

I am concerned about the noise level which the EIR says will not be affected. This is not true and will exceed the levels set up in the 2030 General Plan noise element, policy 1.1. The public address system for an ourdoor drag racing arena will not only extend beyond the property lines, it will be incrediby offensive for homes which are miles away!! 58-2

In addition, the poluntants which will be generated both in the air and the grease, gasoline, etc. which will be poured into the air and ground will cause problems for people, both now and in the years to come. 58-3

Please do not accept this EIR as it does not properly address all of the problems which will affect the airport. 58-4

Sincerely,

Charles J. Griffin Jr.

Letter No. 58: Charles J. Griffin Jr., August 15, 2016

Response 58-1

This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Response 58-2

Section 4.10 of the Draft EIR and Topical Response 7 provide information on noise impacts.

Section 4.2, Air Quality, of the Draft EIR, addresses potential emissions that could degrade air quality.

Section 4.8, Hydrology and Water Quality, of the Draft EIR, addresses concerns related to potential pollution of soil and stormwater.

Response 58-4

This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Lucille Breese, AICP

City of Lompoc

100 Civic Center Plaza

Lompoc, CA. 93436

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AUG 15 2016

Planning Division

Dear Ms. Breese,

Please find enclosed a report of ambient noise levels in our neighborhood that was performed by:

Veneklasen Associates
Consulants in Acoustics /AV/ IT/ Environmental Noise

We hope, that this again will prove that the original noise study has many issues that have not been addressed.

59-1

The existing airport creates very little noise.

There is virtually no noise from Vandenberg Air Base.

The track would operate when many of us are participating in the outdoor weekend activities in our backyards and the peaceful tranquility would be destroyed.

We can hear the crib notes at the high school football games and even the train whistle out on the main track. Therefore the Ambien project sound projections are flawed. It appears that our acoustic data supports this conclusion.

Sincerely,

Claudia Griffin

Veneklasen Associates
Consultants in Acoustics | AV | IT | Environmental Noise

RECEIVED
AUG 15 2016
Planning Division

DRAFT MEMORANDUM

To: Planning Division — City of Lompoc

From: Stephen A. Martin, Ph.D., P.E. — Veneklasen Associates

Date: August 12, 2016

Subject: **Lompoc Motorsports Park Environmental Impact Report – Acoustical Review Comments**

Introduction

At the request of several neighbors surrounding the proposed Lompoc Motorsports Park, Veneklasen Associates, Inc. has reviewed *Section 4.10 Noise* of the Draft Environmental Impact Report (EIR) and measured ambient noise levels in the residential neighborhood. We have the following comments regarding the EIR which indicate the noise issues require additional study and the EIR approval process should be suspended until the additional study is completed.

Measurements

A Larson Davis Model 820 Type 1 sound level meter was used to measure the noise levels at several residences approximately 7,000 to 9,000 feet to the northeast of the proposed site. These measurements occurred over a minimum 24-hour period and indicate the hourly average noise levels (Leq) are between 32 dBA and 52 dBA, with the typical daytime and nighttime hourly average noise levels of 46 dBA and 43 dBA, respectively.

EIR Review

The measured noise levels shown in EIR Table 4.10-3 indicate average ambient noise levels (Leq) varying between 49.5 dBA and 72.3 dBA. These reported noise levels were mainly measured at locations near traffic noise sources and are significantly higher than the ambient noise levels we measured in the residential area as indicated above. The EIR measurements mainly consisted of 15-minute measurements, and none of the measurements were performed during the evening when the ambient noise level is quieter. It appears the EIR noise analysis is based on incorrect ambient noise levels for use in determining the project impact.

Our firm has measured noise during both drag racing events and off-highway vehicle (OHV) race events. Drag racers were measured to produce between 115 dBA and 132 dBA at 50 feet, depending on the racing car class. OHV race events were measured to produce between 59 dBA and 65 dBA at a distance of 1,800 feet. Extrapolating these actual event-measured noise levels to the average distance of 8,000 for the residential area where we conducted ambient noise measurements, the predicted noise levels would be between 70 and 87 dBA for drag racing and between 46 and 52 dBA for OHV racing. These predicted noise levels are significantly higher than the measured daytime and nighttime ambient noise levels of 46 dBA and 43 dBA, respectively. This violates Significance Threshold 4.10-4 as listed in the EIR, *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels without the project?*

The EIR also references noise insulation standards and Title 24 energy conservation standards for residential dwellings. However, many of the existing residential dwellings were built prior to current standards using windows with single-paned glass, and do not have air conditioning systems due to the local climate and residents leave windows open for ventilation. Therefore, exterior noise levels produced by the proposed project will be readily audible inside.

Conclusion

With the above comments regarding issues improperly addressed in the EIR, we believe additional study is necessary prior to completion of the EIR approval process and this process should be suspended until the additional study is completed.

1711 Sixteenth Street • Santa Monica California 90404 • tel: 310.450.1733 • fax: 310.396.3424 • www.veneklasen.com

Letter No. 59: Claudia Griffin (with Draft Acoustical Review), August 15, 2016

Response 59-1

Please see response to comment 13-1 and Topical Response No. 7, Noise.

Response 59-2

Please see response to comment 13-1 and Topical Response No. 7, Noise.

Response 59-3

Refer to Appendix 4.10 of the Draft EIR for noise monitoring data sheets. The Draft EIR **Table 4.10-3** provides the ambient noise environment results and their locations are shown in **Figure 4.10-4.** As shown, average ambient noise levels ranged from 49.5 dB(A) at Alan Hancock College Bike Path, north of proposed Project site to 72.3 dB(A) at the northwest corner of Central Avenue and H Street.

Response 59-4

As discussed in Section 4.10 of the Draft EIR, noise monitoring was conducted over 15-minute intervals with a Larson Davis 831 Sound Level Meter in accordance with guidance provided in the Federal Transportation Authority (FTA) document *Transit Noise and Vibration Impact Assessment.*[1] For the residences along Cabrillo Highway and Purisma Road, 1-hour measurements were taken to gather a wide range of related day-to-day noise from sources within the proposed Project area including traffic along Cabrillo Highway. In addition, noise monitoring data included maximum noise levels associated with takeoff, flight, and landing of aircraft at the Lompoc Airport immediately south of the proposed Project site. These measurements were taken west of La Purisma Highlands residential units. As shown in **Table 4.10-4,** aircraft noise levels ranged from a low of 67.4 dB(A) during takeoff and landing (an increase of 4.7 dB(A) when compared to existing conditions) to a high of 82.4 dB(A) during flight (an increase of 19.7 dB(A) when compared to existing conditions), in which the aircraft was passing over the meter and the Purisma residential units.

Refer to Topical 7, Noise, for a full discussion regarding noise methodology used to assess potential noise impacts. As discussed, the highest increases occurred during the Drag Strip/OHV Trail Ride Area scenario, with exterior noise levels increased by 2.1 dB(A) at nearby sensitive receptors when compared to the existing noise levels. It was determined based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact.

---

1 Department of Transportation, *Transit Noise and Vibration Impact Assessment,* May 2006. http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf

Response 59-5

Please refer to response to comment 13-1.

In addition, please refer to Topical 7, Noise for a full discussion regarding noise methodology and general plan consistency.

Lucille Breese. AICP

City Of Lompoc

100 Civic Center Plaza

Lompoc, CA 93436

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AUG 15 2016

Planning Division

Dear Ms. Breese:

Thank you for allowing all of us to express our wishes and concerns of the Lompoc Valley Motorsports Park Project. Also, before I begin, I believe that in the Lompoc main library there are missing pages from the Draft of the Motorsports Park. The pages 3.0-11 thru 3.0-24, not (fig.) are not included in the report. 60-1

Besides the obvious noise factor of the crowds and the dragsters themselves, one of my main concerns is the P.A. system and I found no information in the report on that subject. 60-2 Other areas included in the Noise Study says that there is no noise issue to mitigate. But their data shows the project fails to satisfy the 2030 General Plan Policy.

> Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards."
>
> Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."
>
> Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."

60-3

On page 5.0-8 of the Motorsports Draft are the "Alternatives Evaluated in Detail" and I have some comments and concerns on some of these statements. 60-4

The Aircraft and Motorsports activities are not compatible. The recreation areas are incompatible being next to an active runway. Aircraft approaches and take offs would be considerably effected by the 55 foot light poles, even with warning lights, and the proximity of the Motorsports Park. 60-5

There are no guarantees that the illegal riding of vehicles in the Santa Ynez Riverbed or the street racing will be reduced. 60-6

The recreational uses for the skydiving will inhibit the landing areas not improve them. 60-7

On page 4.14 under "Estimated Waste-water Generated" I noticed that the schedule of events in the park is every single day and every single weekend, (52 weekends a year). Monday thru Thursday (50 weeks) and Friday's, (52 weeks). Weekday events every Wednesdays will be for 50 weeks. So, in conclusion, everyday neighboring communities will be affected on a daily basis. 60-8

P.3.0-8 This information states that there will be 523+ parking spaces in the main area. Included in this area would be overnight self-contained (RV) Recreational Vehicles. The main problem would be the generators that would be running continuously all through the night. It will be very loud with over 500 generators running and again there is no noise study relating to this subject. I also believe that this night-time noise factor would effect all of the hotel guests in the area. With this in mind, future vacationers to Lompoc would probably not come back to visit and it would again, cut down on business and economical return in the area. Obviously, the neighboring communities would also be greatly effected by this constant noise all through the night. 60-9

Having attended the Lompoc Airport Commissioners Open Meeting, I observed the commissioners in agreement that this project is too close to the airport and it is also using part of the airport property. During the discussion, the history of plane crashes at the Lompoc Airport were brought up. The main concerns were if a plane were to lose power and fly into the grandstands, there would be a great many casualities. It would be a tragic situation for everyone with drastic loss of life, effecting those involved and their families. The City of Lompoc would of course then be open to considerable amount of lawsuits. 60-10

Sincerely,

Claudia Griffin

778 Tamarisk Drive
Lompoc, CA. 93436

Letter No. 60: Claudia Griffin, August 15, 2016

Response 60-1

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 60-2

Please refer to response to comment 40-5 regarding PA systems.

Response 60-3

Please refer to response to comment 17-1 and Topical 7 for a full discussion on consistency to the applicable policies contained within the City's General Plan Noise Element.

Response 60-4

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 60-5

Please refer to response 17-2.

In addition, please refer to Topical 5 regarding land use compatibility. As discussed in the Draft EIR Section 4.9, the proposed Project would be incompatible with the Draft Airport Land Use Compatibility Plan (ALUCP) However, the Draft ALUCP has not yet been adopted, therefore the proposed Project is not required to comply with their proposed safety zone requirements.

As discussed in Section 4.9 Land Use of the Draft EIR, mitigation is required to either reduce the height of the 55-foot lighting standards so they do not penetrate the existing Transitional Surface, or, submit all lighting standards for FAA approval. Therefore, impacts would be less than significant.

Response 60-6

As stated in Section 3, Project Description of the Draft EIR, one of the proposed Project objectives is to reduce illegal riding in the Santa Ynez River bed and street racing. However, as with any illegal activities, one cannot fully preclude their potential.

Response 60-7

Please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB).

As discussed, the sky diving drop zone would need to be relocated which is subject to FAA review and approval, and if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 60-8

This comment does not raise a question or concern regarding the adequacy of the Draft EIR, therefore, further response is not required pursuant to CEQA Guidelines §15204.

Response 60-9

Please refer to Topical 7, Noise, for a full discussion regarding methodology.

As shown in **Figure 4.10-7** of the Draft EIR, noise levels with onsite generators would range between 72 to 82 dB(A) at 50 feet. These noise sources would be primarily located internal to the proposed Project site. The 72 to 82 dB(A) noise levels would occur primarily in the parking areas and along the pedestrian path within the Project site.

Response 60-10

The Draft EIR address safety concerns and hazards in Section 4.7, Hazards.

The Draft EIR determined the proposed Project would have a negligible effect on airport accident risks. This is because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the Lompoc Airport. The probability of accident/safety hazard risks would be similar before Project implementation and after Project implementation. Impacts would be less than significant related to the probability of accident/safety hazard risks.

In addition, the commenter is directed to Topical 1 regarding Airport safety. As discussed, Lompoc Airport is expected a probability of about 0.11 off-airport accidents per year for its current estimated activity level of approximately 30,000 annual operations.[2] The proposed Project would have a negligible effect on Airport accident risks because the proposed Project neither increases nor decreases the number of landings or takeoffs associated with the Airport. In addition, the proposed Project would be subject to FAA review and approval, therefore, minimizing any potential for risks or accidents associated with the Airport.

2 Heliplanners, Aviation Safety Analysis (March 2016)

Al & Emily Harry
740 N. H. St., #250 (mailing address)
Lompoc, CA 93436

RECEIVED

AUG 15 2016

Planning Division

August 14, 2016

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Dear Ms. Breese:

As homeowners in Lompoc whose house is less than one-half mile from the proposed Motorsports Park, we have reviewed the draft EIR with concern. The scope of the 549 page document belies the numerous inaccuracies and areas where mitigation is not addressed or glossed over. This document should be rejected by the City and adopt the first alternative proposed by Meridian Consultants. 61-1

The recommendation by Meridian Consultants states that " the Guidelines requires that an EIR describe and evaluate a range of reasonable alternatives to a project to promote informed decision-making.
The Alternatives to the proposed Project evaluated in this Draft EIR include:

- Alternative 1 – No Project/No Development"

Among our areas of concern with the EIR:
The Environmental section raises a number of issues:

Biological Resources: including mitigation for the land replacement for the displaced plants and wildlife. The recommendation is for 72 acres to "replace the loss of suitable foraging, roosting and potential nesting habitat" for a variety of birds, other animal species and plants. The mitigation requires that the new off-site locations "should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River." 61-2

1. Where are these 72 acres? The property along the Santa Ynez River is all privately owned, so who is going to pay for this land and the cost of maintaining it for the recommended 5 years to ensure that the plant and wildlife are well established in the new location?
2. Who is selecting and paying for the botanist and biologist to determine the flowering and breeding seasons of the affected wildlife? The stringent requirements for 75% survival for the first year alone will need monitoring, continuing for up to five years for 90% survival. Have the costs for these specialists been included in the proposed Project's budget?

Hazard and Hazardous Waste:

1. Who will oversee "Conducting a subsurface geophysical survey near suspected locations of historic USTs and particularly in the area of the 3-inch-diameter pipes?" if unknown USTs are uncovered? Who will cover these costs? 61-3

Fire Protection & Emergency Services:

1. "The proposed Project would produce an increase in demand for fire services during the events held on site." The City's fire department has just been denied a new station. Yet this project requires fire personnel to be on site during racing events. How will this impact the fire department's ability to serve the City with reduced personnel available, and has the Motorsports project planned to compensate the City as stated in the report? 61-4

Page 2

Police Protection:

1. Police services will be needed for major events with projected attendance of over 2,600 people. How will this redirection of City police personnel to Motorsports events impact the department's ability to service the City? Will the City be reimbursed for this redeployment of personnel? 61-5

Hydrology & Water Quality:

1. "Construction could also contribute to the addition of pollutants into the surface and groundwater around the Proposed project site". The assumption of the Consultants is that compliance with the various "appropriate agencies" will take place and therefore impacts to water quality will be "less than significant". Who will be responsible for oversight to ensure these regulations are followed? 61-6
2. A shallow well will be included on site for water use in dust mitigation. The EIR does not take into consideration that a state-wide drought is affecting water usage and residents within the City are required to follow water restrictions. This is the height of hypocrisy to use water resources "solely for dust mitigation". 61-7
3. Two infiltration areas will be constructed to capture surface run-off water, "with no runoff draining into the Santa Ynez River". There is no discussion of where the water in these infiltration areas do eventually drain into – City drainage system? No new drainage is being built. So does the water eventually seep into the ground, affecting the groundwater? The vehicles on the tracks will be leaving significant amounts of chemicals from tires, exhausts, etc. over time, and water draining into these infiltration ponds will be polluted. What is the mitigation for this polluted water? 61-8
4. A motocross/mud bog will needlessly waste precious water supplies. This is planned to cover approximately 4.6 acres! Does "dought" mean anything to the Motorcross people? 61-9

Air Quality:

1. Will smog equipment be required on all vehicles using different recreational areas? How will this affect the air quality of the Valley as a whole, and especially those living east of the Project, when the off-shore winds blow into their homes and yards? The numerous air quality charts provided by Meridian really do not address the pollution that this facility will actually produce on a daily basis because the numbers are computer simulations. Nor how the plan meets the Lompoc 2030 General Plan Conservation and Open Space Element to improve air quality and minimize emissions from vehicles. 61-10

Noise:

The noise tests for this project have been addressed by several residents, including a 21 page dissection of the test process that basically points out that the entire process was badly flawed. Our concerns include:

1. A very limited number of vehicles (cars) were used, with no mention of the models/engine size/or specific types of mufflers (if any). The Motorsports project will have motorcycles, ATV's, and off-road go-carts/buggies. None of these vehicles were included in the tests, and most run with open mufflers. Why? 61-11

2. The test was conducted on a weekday over a short period of time (3 hours). It does not take into account the lowered traffic volume times over the weekends when the Lompoc Valley is quiet. Proper test results would result in noise impacts much higher than reported.

3. Noise monitors were placed in locations that minimized the decibel levels from the tested vehicles. Two monitors on H St near Purisima Highlands gave low reports as one was buffered by a hill, and the other placed below road grade, with noise waves flowing over it. Not the best placement for accurate test results.

4. Why was no noise monitoring done on Central Avenue, specifically at O St and Central for the study? This location is in direct line of sight of the project site and will impact all residential tracts less than ½ mile from the project. Table 4.10-6 shows Proposed Project Area Sensitive Receptor Locations. There is no

indication when these proposed receptors will be in place or when they will be used. Whereas Table 4.10-3 shows where the actual five noise measurements in the project vicinity were taken, with none near the housing developments on Central Ave.

5. Decibel noise levels required by the city general plan will be compromised with this project. Vehicles are currently gunning their engines and racing on a stretch of Central from L St. to V St. The decibel levels are well above city levels, with most sounding like there are no mufflers, and the police are not enforcing the current offenders. Who will be monitoring and enforcing the City noise ordinance at the Motorsport facility? The physics of noise waves do not stop at the Project property line.

6. The noise study done by Meridian is amateurish at best and does not fully encompass all the noise that will be generated from: 61-11

   - The different types of vehicles using the facilities;
   - Noise generated from the 90+ pit spaces as vehicles are tested prior to races
   - The volume of additional traffic on Central Avenue entering the facility on V St., especially on weekends when higher usage is expected
   - The large RV encampment running generators at night
   - The PA system to be used for IHRA drag races
   - Tables 4.10-10. 4.10-11. 4.10-12 for Drag Strip and OHV showing no calculated increase in noise decibels are not to be believed.

     The numbers are based on computer modeling not actual drag strip racing featuring two vehicles, racing 20 times per hour with a duration of 5-12 seconds. Should this amount of racing actually occur as projected, there is no way that there would not be increased decibels affecting residents in the surrounding area.

This letter only touches on a relatively small number of items in the EIR that was presented to the City and its residents. Mitigating factors suggest variations from no chance of success to possibly being accomplished. What is not addressed is the quality of life in the Lompoc Valley that will be so greatly impacted by this project – primarily in a negative way. 61-12

There is no indication that this project will bring in new jobs (initially it is to be run all by volunteers), and with the projected RV population that is anticipated, the hospitality and restaurant industry will not see any benefit either. The benefit will only be to the very small percentage of local people who are proposing the project, not to the City of Lompoc at large. 61-13

We strongly feel that this EIR draft is very flawed and should be rejected by the City. 61-14

Sincerely,

Al & Emily Harry

Al & Emily Harry

A copy of this letter is being emailed to you, with a hard copy to be delivered to City Hall on Monday Sept. 15

Letter No. 61: Al and Emily Harry, August 15, 2016

Response 61-1

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 61-2

Please refer to response 42-1.

As noted in the Draft EIR Section 4.3, Biological Resources, implementation of the proposed Project would result in the loss of 14.5 acres of arroyo willow thicket due to grading excavation. That acreage includes 0.5 acres of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted above, the mitigation for the Runway Expansion Project was not successful. Loss of the arroyo willow thicket habitat is considered a significant impact.

The Draft EIR identifies the following mitigation measure to reduce impacts related to the biological resources:

MM 4.3-1 To offset impacts to arroyo willow thicket on site (14.5 acres), off-site mitigation will be implemented at a 5 to 1 ratio for a total of 72.5 acres (14.5 acres of impacted arroyo willow thicket at a 5 to 1 ratio equals 72.5 acres). This acreage includes 0.5 acre of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted, the mitigation for the Runway Expansion Project was not successful so no credit is given for that mitigation.

Mitigation may be conducted adjacent to the Project in remaining arroyo willow thickets, and/or at appropriate off-site City-owned properties. Should off-site locations be considered, they should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River.

Mitigation shall be provided for through the development of a Restoration and Mitigation Plan (Plan). The Plan will compare the performance of the mitigation area against the recommended performance criteria to identify any shortcomings or problems in the mitigation area. The Plan will include methods for evaluation of plant establishment, vigor, and health, and for evaluating the percent cover by native and non-native plant species. In addition, the Plan will include specific details on a planting palette invasive

species removal and methods for planting and irrigation. A preliminary conceptual planting palette and schedule of success criteria (is included in the mitigation). The planting palette and success criteria may change and will be adapted to site specific conditions when a final off-site mitigation area is selected. The Plan should provide for quarterly monitoring visits during the first year, biannual visits during the second and third years, and annual visits during the fourth and fifth years.

The Project Plan will be developed in consultation with City of Lompoc and submitted to the CDFW for review and concurrence at least 30 days prior to beginning construction.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 61-3

As noted in the Draft EIR Section 4.7, Hazards, currently the proposed Project site does not contain any known USTs. According to GeoTracker, the proposed Project site is neither considered a LUST cleanup site or permitted as an underground storage tank facility. Additionally, the ESA Report conducted by JHA Environmental, Inc. (see **Appendix 4.7 A**) indicates no underground or above ground storage tanks were observed on the proposed Project site. However, it was reported underground and/or above ground storage tanks may have occurred historically on the proposed Project site. Specifically, two sets of 2 to 3-inch diameter rusty steel pipes extend out of the ground, where a former asphalt plant once reportedly operated, in the southcentral portion of the proposed Project site. As a result, construction, grading, and excavation of the proposed Project site could have the possibility to uncover any unknown USTs.

The Draft EIR identifies the following mitigation measure to reduce impacts related to the USTs:

MM 4.7-1 Prior to the issuance of grading permits, the site developer shall:

- Conduct a subsurface geophysical survey near suspected locations of historic USTs, and particularly in the area of the 3-inch-diameter pipes. If anomalies are identified, then the soil over the anomaly shall be carefully excavated to determine the exact nature of the anomaly. If a UST is discovered and/or confirmed, then a permit to remove the UST shall be acquired from the County of Santa Barbara Health Department that shall include the collection of soil samples from beneath the UST for

laboratory analyses. If a release of petroleum hydrocarbons is confirmed, then soil assessment and remediation shall be undertaken with oversight from the regulatory agency.

- If no UST is identified on site, then, at a minimum, a Soil Management Plan (SMP) shall be prepared. The SMP shall describe the methods to be implemented to protect health and safety of the construction workers working on the proposed Project and the health and safety of the general public during the proposed on-site soil grading/excavation activities required for the proposed Project. The SMP would provide the methodology for the grading contractor to deal with any suspect subsurface structures, debris, stained, or odiferous soil that might be encountered and that could represent a hazard to the workers or the public.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 61-4

Please refer to response 35-5.

As noted in the Draft EIR Section 4.11.1, Fire Protection Services, the proposed Project would produce an increase in demand for fire services during the events held on site. The increase in participants and spectators traveling to the site from different areas, locally and regionally, would increase the risk for potential fire and medical hazards on site. Fire risks associated with the OHV and drag strip events would include vehicular damage and collisions. These risks, combined with one or more off-site fires and/or car accidents may impact the local responding units.

As discussed in the Draft EIR, the Applicant will coordinate with the Lompoc Fire Department to develop and implement an Incident Plan required by **MM 4.11-1**. The Incident Plan shall identify the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications and supervisory personnel. In addition, the Plan would also identify fire suppression equipment, supplies, and other services to be provided by the site operator during future motorsports events, including the number of fire personnel and/or EMS personnel. The site operator shall reimburse the City for fire inspection and protection services provided under the Incident Plan.

Response 61-5

As discussed in Section 4.11.2 Police Protection Services of the Draft EIR, the proposed Project would have the potential to increase public service demands. However, the proposed Project would be required to develop a traffic control plan which requires detailed provisions for traveler information, a signage plan, traffic control personnel, and entry gate operations. As a result, the proposed Project would not degrade existing facilities provided by the Lompoc Police Department to serve the needs of the proposed Project.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 61-6

As discussed in Section 4.8 Hydrology, of the Draft EIR, the potential increase in soil erosion, siltation, and construction-related pollutants could degrade downstream surface water or groundwater. However, the construction of the proposed Project would comply with the regulatory requirements to minimize, to the maximum extent practicable, the degradation of water quality.

The proposed Project would be required to comply with NPDES requirements. Construction activities would be subject to the NPDES general construction activity permit and would be required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters and consider the use of post-construction permanent Best Management Practices (BMPs).

Additionally, the proposed Project would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs that would be employed to prevent soil erosion and discharge of other construction-related pollutants, as well as a monitoring program to ensure that BMPs are implemented appropriately and are effective at controlling discharges of stormwater-related pollutants. The Lompoc Municipal Code requires the submittal of an Erosion Sediment Control Plan and/or SWPPP with the submittal of a grading permit application.[3]

Compliance with those requirements would reduce potential construction and post-construction water quality impacts to less than significant.

3 City of Lompoc, Municipal Code, Title 15, Chapter 72 – Grading.

Response 61-7

As discussed in Section 4.14, Utilities, of the Draft EIR, nonpotable water from the on-site well would be used to control dust. Water consumption for dust watering was estimated assuming watering for 15 minutes every hour, and using the construction watering amount of 0.89 acre-feet/acre of water. The total area of the proposed Project that would need to be watered for dust control is approximately 11.77 acres which includes the OHV area comprised of the beginner's track, the oval track, the endurocross and trials area, the arena cross area, and the motocross/mud bog and sand drag lanes. As shown in the Draft EIR Table 4.14.1-9, the proposed Project is estimated to have a yearly water demand for nonpotable water of approximately 252,000 gallons or 0.77 acre-feet.

Operation of the proposed Project is estimated to have a yearly potable water demand of 7.95 acre-feet upon completion, or 2,591,000 gallons (approximately 7,100 gallons per day) for each day of operation. As mentioned in **Section 3.0 Project Description**, the proposed Project would generate an estimated maximum of 2,640 individuals at any one time that would require potable water.

As discussed in the City's 2010 UWMP, the commercial, institutional, and industrial sectors are projected to increase water demand approximately 146 afy over the next 20 years (this is being updated in the 2015 Urban Water Management Plan).[4] The proposed Project's 7.95 afy would account for approximately 5 percent of the increase in projected water demand in the commercial, institutional, and industrial sectors over the next 20 years. Therefore, the City has adequate water supplies to meet the demands of the proposed Project. It should be noted the proposed Project will be required to offset potable water demand pursuant to Section 13.04.070(e) and (f) of the LMC.[5]

Accordingly, impacts would be less than significant.

Response 61-8

As discussed in Section 4.8 Hydrology, of the Draft EIR surface water runoff would be directed to two infiltration basins extending on either side of the proposed drag strip and return road, as illustrated in **Figure 3.0-11, Conceptual Grading Plan**. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River. Those areas include:

- Infiltration Area A would cover an area approximately 44,300-square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet of stormwater.

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4 The total projected 146 afy water demand increase includes the 137 afy increase from the commercial and institutional sector and the 9 afy increase industrial sector.

5 Lompoc Municipal Code 13.04.070 Water Efficient Landscape and Irrigation Standards.

- Area B would be approximately 34,500-square feet in size, with an average depth of 3.6-inches, and would contain approximately 10,270-cubic feet of stormwater.

Response 61-9

Refer to response 61-7.

Response 61-10

Impacts associated with air quality are detailed in Section 4.2, Air Quality of the Draft EIR. Further, atmospheric conditions to the degree relevant, are utilized in air quality and noise modeling. The section also notes a potentially significant public health standard would occur if the Hazard Index is more than 1.0 for non-cancer risk. For non-carcinogenic effects, the hazard index totaled less than one (8.5E-02 and 6.4E-02) for both the toxic 1 hour and 8-hour exposure scenarios. Therefore, non-carcinogenic hazards would be below the Hazard Index of more than 1.0 for non-cancer risk. Non-carcinogenic impacts would be less than significant. With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant.

Response 61-11

Please refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 61-12

"Quality of life" is not a threshold identified specifically by the City for evaluation by itself.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 61-13

If the City Council certifies the Final EIR and decides to move forward with the Project, then the City Council would need to adopt a Statement of Overriding Considerations noting the reasons the Council believes the benefits from the proposed Project outweigh the significant unmitigated impacts.

Response 61-14

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Breese, Lucille

From: Joan Hartmann [joanhartmann2016@gmail.com]
Sent: Monday, August 15, 2016 1:09 PM
To: Breese, Lucille; Breese, Lucille
Subject: Comments to Lompoc Motorsports Park DEIR (SCH No. 2015121005)

Email to:
L_Breese@ci.lompoc.ca.us; lbreese@ci.lompoc.ca.us

RECEIVED
AUG 15 2016
Planning Division

8/15/2016

Lucille T. Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

Re: Lompoc Motorsports Park Environmental Impact Report (SCH No. 2015121005)

The Lompoc Motorsports Facility is of great interest to both the residents of the City of Lompoc, and the residents of the surrounding unincorporated area. There is enormous concern regarding not only the significant environmental impacts, but also the cost of the facility and mitigations, which may ultimately be borne by area taxpayers. State Parks funds should not be used to fund any facilities which destroy sensitive habitat, result in significant and unavoidable environmental impacts to air quality, and potentially result in significant impacts to biology, noise, public services, and other areas which have not yet been adequately studied and disclosed. 62-1

As a former Planning Commissioner for the County, I have great concerns with the adequacy of the Draft EIR which has been prepared and wish to offer the following comments on the Lompoc Motorsports Park Draft Environmental Impact Report 62-2

1. Air Quality

The DEIR finds significant and unavoidable impacts from volatile organic compounds (VOCs) and nitrogen oxides (NOx) emissions during operation of the proposed Project. 62-3

These emissions pose very serious dangers to the well-being of the people of Lompoc and surrounding unincorporated Santa Barbara County. According to the American Lung Association, both VOC's and NOx form tropospheric, or ground level ozone, which damages lung tissue. VOC's cause breathing difficulty and can damage the central nervous system as well as other organs; NOx diminishes lung function, worsens asthma, and can cause heart attacks. (http://www.lung.org)

There are no overriding considerations for this project that could possibly make reasonable people decide to endanger residents. Based on these findings, Alternative 1: No Project/No Development, the environmentally superior alternative, should be accepted.

1

In addition, Mitigation Measure 4.2-1 improperly defers the development of the Fugitive Dust Control Plan until after project approval, nor does it provide any assurance that the standard of 8 ug/m3 for particulate matter can be met, given that the modeling demonstrated 315.96 ug/m3 and 148.43 ug/m3. 62-3

2. Biological Resources

A. The DEIR acknowledges the loss of critical habitat but improperly defers the formulation and adoption of a Restoration and Mitigation Plan and the identification of an off-site location. Mitigation Measure 4.3-1 is totally inadequate as written, as it only provides that a plan be submitted 30 days prior to beginning construction, it does not provide that the plan has to be approved. Also, as written there is no guarantee that the plan will be successful, only that it will be monitored. Prior to project approval, the off-site location must be identified, and the Restoration and Mitigation Plan with measurable goals and penalties must be adopted.

B. Impacts of noise, lights, and vibration to animal species are inadequately assessed. The DEIR states that these impacts "may occur," yet there is adequate research to confirm that impacts will (not "may") occur to sensitive species, and must be acknowledged. Research by the US Department of Transportation documents that exposure to noise leads to reduction in breeding success and population density for many species of birds with density of sensitive species reduced 14 and 44% up to a mile from the source of noise. (https://www.fhwa.dot.gov/environment/noise/noise_effect_on_wildlife/effects/wild04.cfm).

The DEIR states: OHV and dragstrip race events will produce noise levels of 76 to 80 decibels at adjacent habitat on the south and north of the river; above the accepted level of 60 to 65 decibels for southwestern willow flycatchers during nesting season. The DEIR concludes these noise levels are less than significant because they will be only during racing. That the sound will be intermittent rather than constant does not ameliorate its impacts. Research has found that exposure to sudden, intense noise reduces egg production in birds and causes hysteria in various strains of chickens. (http://www.cvzv.sk/slju/14_2/8_Broucek.pdf) 62-4

Finally, the DEIR proposes: "it is expected that individuals of these species, if unable to habituate to proposed Project operational conditions, would be able to relocate to the nearby suitable habitat." This disregards the carrying capacity of habitat for specific species. According to the USDA Forest Service, impact of habitat loss on small populations of willow flycatchers "can be particularly severe." Willow flycatchers persist as local breeding groups "that are linked together and maintained over time by immigration/emigration and dispersal." Habitat loss not only eliminates the possibility of individuals occurring at a particular location, it reduces the number of individuals that can occur throughout a region by leading to competition and can result in mortality or loss of breeding opportunities. (http://www.fs.fed.us/rm/pubs/rmrs_gtr060/rmrs_gtr060_013_024.pdf)

In addition, Mitigation Measures 4.3-2, 4.3-3, 4.3-4 are inadequate as written, and each survey must (not should) be conducted as proposed. 62-5

3. Noise

The DEIR acknowledges that existing exterior noise levels in the surrounding area exceed the City's exterior noise standard, but asserts that the ADDITION of noise from special events, or drag racing (up to 20 times per hour) would go unnoticed. 62-6

The analysis of noise impacts is inadequate as suggested by the following sources:

2

- The California Off-Highway Vehicle Noise Study indicates that motorcycles produce noise levels of 84-104 dBA and ATV's produce noise levels of 84 to 95 dBA. (http://ohv.parks.ca.gov/pages/1140/files/ca%20ohv%20noise%20report%20wr%2004-31-06.pdf)
- A study conducted for the City of Concord, North Carolina examined sound levels produced by drag racing found noise levels up to 85 dBA that were audible in the nearby community (over a mile away). (http://www.hmmh.com/cmsdocuments/InterNoise09_Dragstrip-paper_TMJ.pdf)
- According to the 3M Occupational Health and Environmental Safety Division, drag racing in stands 15 meters from source produces 145 dBA. (http://multimedia.3m.com/mws/media/888553O/noise-navigator-sound-level-hearing-protection-database.pdf) p 6 of 104.

62-6

4. Police & Fire Protection

The potential impacts on police and fire protection are not adequately analyzed.

62-7

A. Police Services: the DEIR stated that the project could generate an intermittent increase in demand for police services during events held on site with up to 2,620 people, and that impacts to Lompoc Police Department's ability to provide law enforcement services could result. However, there is no analysis of this impact, nor is there any analysis of how an incident at the motorsports facility may impact response time to other areas of the City. In addition, the project description is silent on the issue of alcohol service. If alcohol is available on site for large events, this could lead to a much larger impact on police services, both to handle on-site issues, and traffic following events. However, there is no analysis of these potential impacts, nor how many officers may be required and proposed "mitigation" is the future development of a "Traffic and Parking Control Plan," and as noted previously, CEQA does not allow the formulation of mitigation measures to be deferred.

62-8

B. Fire Protection and Emergency Services. Again, the DEIR identifies that the proposed project would produce an increase in demand for fire and emergency services during the events held on site. However it does not analyze the scope of the potential increase in services, nor the ability of the Lompoc Fire Department to provide these increased services with existing staffing, and once again attempts to defer the development of a required mitigation until after project approval. The Cumulative impacts section of the DEIR identifies that there is a "potentially significant adverse cumulative impacts on the LFD's services and their ability to provide acceptable response times." Since the project is relying on mutual aid from the County of Santa Barbara and Vandenberg Air Force Base Fire Departments to address the cumulative impacts, the potential impacts on those departments should be analyzed and disclosed to decision makers.

62-9

5. Overlooked/Inadequate project description & analysis

The project includes overnight recreational vehicle (RV) camping for 1200 people onsite (4.2-22), but does not examine the environmental Impacts of overnight RV camping. Impacts that may be significant include air pollution and GHG impacts (including impacts of running generators), impacts to water resources, impacts to utilities (including electricity generation and sanitation), noise and lighting impacts on neighbors, and biological impacts of night time noise and light on sensitive habitat. These must be assessed.

62-10

Thank you for considering my comments. I look forward to these issues being addressed.

Joan Hartmann
1220 Poppy Valley Road
Buellton, CA 93427

3

Letter No. 62: Joan Hartmann, August 15, 2016

Response 62-1

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 62-2

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 62-3

Section 4.2, Air Quality, of the Draft EIR evaluated impacts to air quality. Emission of VOC and NOx associated with the proposed Project result from vehicle traffic, with the overwhelming majority of those emissions coming from passenger vehicles. The level of emissions generated for a single day would remain above daily mass significance thresholds for NOx and VOC adopted by SBAPCD. Impacts would be significant and unavoidable under these thresholds developed by SBAPCD.

Lead agencies have the ability to override significant and unavoidable impacts based on the beneficial purpose of the Project. The City would be required to adopt a statement of overriding considerations with regard to this impact should they decide to approve the proposed Project.

Response 62-4

Section 15126.4 of the CEQA Guidelines an EIR must describe feasible measure which could minimize significant adverse impacts. Measures may specify performance standards which would mitigate the significant effect of the project which may be accomplished in more than one specified way. This measure identifies the specific type of vegetation similar to existing conditions, provides a performance standard, and a timeline for completion. Accordingly, the Draft EIR does provide a feasible mitigation measure for biological resources.

Please refer to response 42-1.

The Draft EIR Section 4.3, Biological Resources, provides an evaluation of the impacts to wildlife. In addition, please refer to Topical Response 4 regarding indirect impacts to biological resources. While it is possible there could be temporary indirect impacts to nesting birds from elevated noise levels and vibrations associated with construction, potential impacts would be considered less than significant due to minimal type of construction activities that would be taking place. Furthermore, proposed Project operation, noise levels, vibration, dust and lighting impacts would be temporary, and limited to proposed Project events. Therefore, indirect impacts would be less than significant.

Response 62-5

Please refer to Topical Response 2, Biological Resources. Surveys for black-flowered figwort and southwestern willow flycatcher were completed and did not identify presence of either species. Mitigation measure **MM 4.3-4** is a standard mitigation measure that provides a timeline for completion, a performance standard, and several options to ensure impacts to bird species are minimized. The mitigation does meet the standards of Section 15126.6 of the CEQA Guidelines.

Response 62-6

Please refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 62-7

As discussed in Section 4.11.2 Police Services of the Draft EIR, the proposed Project would likely generate an intermittent increase in demand for police services during events held on site as up to 2,620 persons could be onsite. Additional police services may be required on site for law enforcement, peacekeeping, crowd control, and potentially traffic control on the affected roadways. **Section 4.13, Traffic and Circulation**, discusses a traffic and control plan that would be required as part of the proposed Project and that would address the need for additional traffic control personnel. The proposed Project would be required to develop a traffic control plan which requires detailed provisions for traveler information, a signage plan, traffic control personnel, and entry gate operations. As a result, the proposed Project would not degrade existing facilities provided by the Lompoc Police Department to serve the needs of the proposed Project. Impacts to police services would be less than significant.

As discussed in Section 4.11.1 Fire Protection Services of the Draft EIR, the proposed Project would produce an increase in demand for fire services during the events held on site. The increase in participants and spectators traveling to the site from different areas, locally and regionally, would increase the risk for potential fire and medical hazards onsite. Fire risks associated with the OHV and drag strip events would

include vehicular damage and collisions. To alleviate potential onsite fire hazards and the spread of a fire off of the site, fire hydrants are included in the design of the proposed Project. Specifically, a new 10-inch fire hydrant water main with a shutoff valve would be tapped into the existing line located within George Miller Drive. New fire hydrants with shutoff valves would be located along the western end of the drag strip and in the OHV pit area (see **Figure 3.0-10**). Storage and dispensing of fuels are governed by the 2013 California Fire Code (CFC) as amended and adopted by the City.[6]

As discussed in the Draft EIR, the Applicant will coordinate with the Lompoc Fire Department to develop and implement an Incident Plan as required by **MM 4.11-1**. The Incident Plan will identify the number of fire department personnel to be provided, including fire suppression/emergency medical service (EMS), fire prevention (fire inspectors), emergency communications and supervisory personnel. In addition, the Plan would also identify fire suppression equipment, supplies, and other services to be provided by the site operator during future motorsports events, including the number of fire personnel and/or EMS personnel.

Response 62-8

Please refer to response to comment 62-7.

Response 62-9

Please refer to response to comment 62-7.

Response 62-10

The Draft EIR evaluated potential impacts related to noise, air quality, land use, aesthetics, traffic, etc., that may significantly affect the nearby residents and their quality of life. The Draft EIR's impact analyses either resulted in less than significant impacts or devised mitigation measures to reduce impacts to a level of less than significant.

As noted in the Draft EIR, Section 3.0, Project Description, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provisions for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained. Because the proposed Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use.

Please refer to response 60-9 regarding noise of generators.

6 California Code of Regulations tit. 24, pt. 9, California Fire Code 2013, effective date January 1, 2014.

Breese, Lucille

From: Larry Henry [lhenrydd790@msn.com]
Sent: Sunday, August 14, 2016 12:11 PM
To: Breese, Lucille
Subject: EIR motor sports park

August 1st front page article stated it is the hope of those who want to build the motor sports park to turn it over to the city of Lompoc as each part is completed. 63-1

My question concerning the EIR as stating there is no problem with water run off.

Are the containment ponds going to be 100% sealed and water tight?

If not the city may end up with a toxic waste site.

As well as polluting ground water. 63-2

I recommend that you contact the state water board in San Luis Obispo, CAL EPA, U.S. EPA, CA. Fish & Game, U.S. Fish & Game, Vandenberg Environmental as well as the state costal commission.

The last two as any pollutants that get into the river or ground water may very well end up in the protected waters of the lagoon at Surf Park and the ocean along Vandenberg Air Force Base.

Where will the city get the money to staff, operate, maintain and repair this park? 63-3

Go online and read CALFIRE code requirements for public amusement parks, which motor sports parks come under. 63-4

Why would the city of Lompoc get involved in such a potential disaster?

RECEIVED

AUG 15 2016

Planning Division

1

Letter No. 63: Larry Henry, August 15, 2016

Response 63-1

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 63-2

As discussed in Section 4.8 Hydrology, of the Draft EIR, surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road, as illustrated in Figure 3.0-11. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River. Those areas include:

- Infiltration Area A would cover an area approximately 44,300-square feet in size, with an average depth of 1 inch, and would contain approximately 3,560 cubic feet (cu. ft.) of stormwater.
- Area B would be approximately 34,500-square feet in size, with an average depth of 3.6-inches, and would contain approximately 10,270-cu. ft. of stormwater.

Together, those areas would provide a total of approximately 13,830 cu. ft. of stormwater capture.

The two existing 10-inch drain pipes would be extended north from their current terminus under the proposed access road and drain into the proposed infiltration areas. The concrete paved area for the drag strip, return road and staging areas would also drain into the proposed infiltration areas. (see Figure 3.0-11).

Infiltration basins allow water to slowly infiltrate and percolate through the soils acting as a filter. Infiltration basins are believed to have a high pollutant removal efficiency, and can also help recharge the groundwater, thus restoring low flows to stream systems.

As the proposed Project would not increase stormwater flow offsite, and would direct all stormwater flow to infiltration areas on the proposed Project site, impacts would be less than significant.

Response 63-3

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 63-4

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Breese, Lucille

From: ART HIBBITS [ahibbits01@gmail.com]
Sent: Monday, August 15, 2016 10:10 AM
To: Breese, Lucille
Subject: Additional Comments to DEIR
Attachments: M sports elevations.jpeg; Retention Basins.jpeg

Lucille: Please include this eml and the attachment to my previous submittal. The concerns are that the site is:
(1) In a designated flood zone and has been in fact flooded historically. 64-1

(2) Not level and slopes downward from South to the North, as well as from the East going West. (please refer to the attachment which is from Google Earth Photo 6/6/2012 and my elevation readings.) Assuming that a drag strip needs to be near level, considerable fill from offsite will need to be introduced into the flood plane. As an alternative, cut and fill work might attain a level site, BUT both modifications have a potential for detrimental alterations to the direction and velocity of high water events. 64-2

(3) Historically similar activities in a river and it's flood way have not been allowed in SBCo. and elsewhere The repair, regrading, and repaving of the washed out Rucker Road, Santa Ynez River Crossing and the same type of work on the Lompoc/Casmalia Road Crossing of San Antonio Creek have not been allowed and the roads remain closed. The proposed site modifications appear to be much greater in terms of earth moving and asphalt. 64-3

Previously we and others have pointed out potential problems w/ the retention basins such as size, design, and ability to accomplish anything of value. please refer to the State of Calif. Manual for design and construction of retention and detention Basins. Please see second attachment for the source 64-4

To summarize, this DEIR should not be approved in it's present form. To grossly understate the potential impacts of this proposal is an ill-advised approach to satisfy to CEQA and NEPA requirements. 63-5

The project description is flawed and the proposed site is totally unacceptable.

Respectfully submitted, ART and SHERRY HIBBITS

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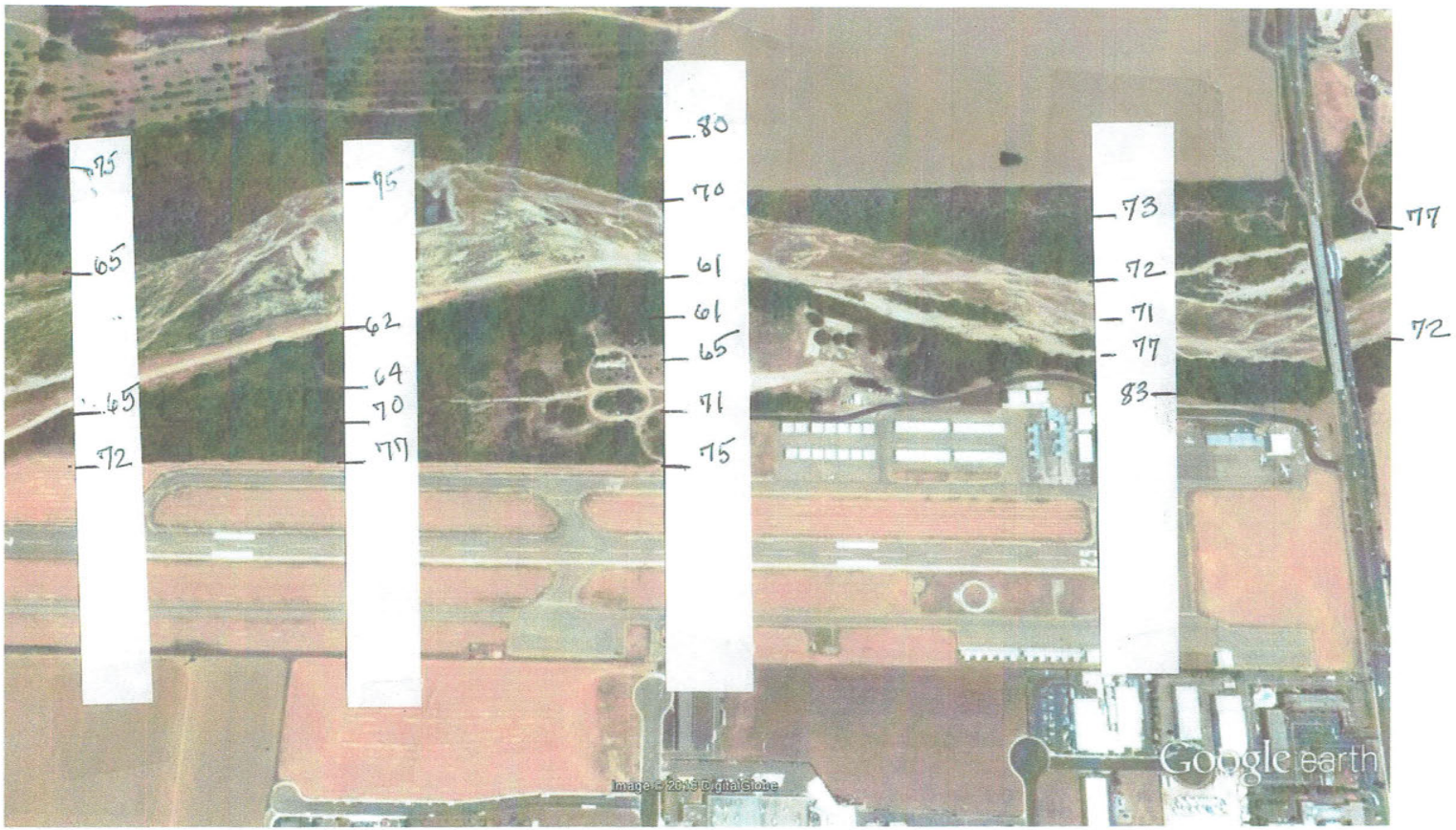
AUG 15 2016

Planning Division

1



61, 65, 75, 83, ETC. = ELEVATION ABOVE SEALEVEL IN FEET

DATE OF PHOTO 6/6/2012

According to the Water Quality Board member Dave Innes, he concurs with Art's conclusions, the proposed retention basins will not mitigate the encroached flood plain.

I would like Art to review this document to determine if it is relevant to what maybe required for this project.

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Flood%20Control/Rules%20and%20Procedures/Stormwater%20Detention-Retention/dssdr-final-201406-manual.pdf

Letter No. 64: Art and Sherry Hibbits, August 15, 2016

Response 64-1

As discussed in Section 4.8, Hydrology of the Draft EIR, the proposed Project is located within a 100-year flood hazard area as indicated by the City's General Plan. However, the proposed Project would include a stormwater drainage system that would allow water to be captured on site, and would not result in any localized flooding hazards.

Response 64-2

As discussed in Section 4.8, Hydrology of the Draft EIR, the proposed Project site, located on the northern side of the City along the Santa Ynez River, is relatively flat, with drainage toward the north. Ground-surface elevations range from approximately 62 feet amsl to 83 feet amsl. The proposed Project would be largely left flat and not have substantial grading that would alter the topography. The proposed Project site would be improved with additional impervious areas (approximately 233,000 sq. ft.) to accommodate the drag strip and staging areas. The proposed Project site would be graded to direct stormwater from the edges of the site toward the center (see **Figure 3.0-11**). Surface water runoff would be directed to two infiltration basins extending on either side of the drag strip and return road, as illustrated in **Figure 3.0-11**. All surface water runoff would be captured in these two areas with no runoff draining to the Santa Ynez River.

Response 64-3

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 64-4

Please refer to response 63-1. Please note these basins would be infiltration basins and not retention basins.

Response 64-5

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Breese, Lucille

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AUG 15 2016

Planning Division

From: Tom Hom [homtom52@yahoo.com]
Sent: Sunday, August 14, 2016 10:27 PM
To: Breese, Lucille
Cc: Lingl, Bob
Subject: Lompoc Motorsports Project Draft EIR

My comments regarding the Draft EIR for the Lompoc Motorsports Project:

1. Page 2.0-15, finding of Significant and unavoidable for VOC and NOx cannot be mitigated MM 4.2-1 through MM 4.2-4 which deals with dust and race participants rather than patron attendance which overwhelmingly cause the VOC and NOx impact. See page 4.2-31. Listing MM 42-1 thru MM 4.2-4 implementation is erroneous and misleading. 65-1
2. Page 2.0-45-48, Operation Noise from drag strip racing and OHV area the finding of only a 2.2 dB(A) increase is rather incredulous. ... Was noise level, proximity, duration factored in? The conclusion for a Less than Significant Impact and the lack of mitigation measures may be erroneous despite what is stated in Section 4.10 65-2
3. Page 2.0-49, Police Protection did not evaluate the potential for increased DUI. 65-3
4. Page 2.0-50, Recreation, I read in the news that Sky Dive Santa Barbara will move away if the Project is approved. The economic impact upon business and tourism should be included and evaluated for significance and mitigation. 65-4
5. Page 2.0-55, does the new water wells require permit and approval from the Santa Ynez Water Conservation District and other jurisdictional entities? 65-5
6. Page 4.2-27, Threshold 4.2-3 state the proposed Project would exceed the daily mobile emission threshold for VOC and NOx. What are the mitigation measures? Also page 4.2-30 state the majority of the VOC and NOx emissions ...result from vehicle traffic, with the overwhelming majority of those emissions coming from passenger vehicles. The listed Mitigation Measures MM 4.2-1 and MM 4.2-2 in the next paragraph does NOT address that impact and is misleading association that VOC and NOx would be mitigated. Page 4.2-30 state that the number of trips or of the length of the motor vehicle trips on a motorsports weekend event day would need to be reduced; how is that to be implemented and enforced? 65-6
7. Page 4.9-17 Sky Dive Santa Barbara recent announcement they would move to Santa Maria IF this Project is approved should be evaluated and discussed for its economic impact upon tourism and business. MM 4.9-4 does not do justice in explaining the adverse impacts the Project has upon the loss of SDSB and in essence encourage the elimination of this business. 65-7
8. Page 4.10-35+ Event Noise, Drag Racing modeling arrive at a conclusion that drag racing will barely be audible, 2.2 dB(A), above ambient noise does not match real world experience. I would question the validity of the model as applied to the Project location in Lompoc. 65-8
9. Page 4.10-49, Operation-Event-Related Noise, Draft EIR erroneously dismiss the mobile source of noise by the Project because they are temporary. The Draft EIR erroneously conclude that temporary increase in ambient noise levels would not be cumulatively considerable. That is wrong. It is the constant recurrence of drag racing noise from 9 AM to sunset or 10 PM, 52 weeks per year, that is a public nuisance and the source of wide spread public opposition to the Project. This Draft EIR fall short of answering the public concerns. 65-9
10. Section 4.11.2 Law Enforcement should evaluate potential impacts from increased DUI's. 65-10
11. Page 5.0-34 Drag Race Only Alternative, Noise, similarly focus on short term construction noise, and long-term operational noise generated by traffic. Traffic by attending public patron? This is the 2.0 dB increase? What about the temporary, constantly recurring drag racers noise level? 65-11
12. I did not find in the Draft EIR any Project mobile source restrictions on modifications, e.g. mufflers, exhaust bypass, etc. Will the Project allow modified racers? Does the noise modeling account for modified racers as a more significant noise source? 65-12
13. Page 5.0-38 points out the Environmentally Superior Alternative and Environmentally Superior Alternative Among the Alternatives. I concur with the Draft EIR on the No Project and the OHV Facility Only alternative. 65-13

1

Illegal street racing is a city or county law enforcement responsibility to enforce. The City need not latch onto every economic activity that is proposed and should be willing to forgo those of questionable value. 65-13

14. Page 7.2-2 referring to Section 4.2 Air Quality, again dismiss mobile emissions. Incomplete evaluation. 65-14

Regards,
Thomas Hom
Lompoc Resident

2

Letter No. 65: Thomas Hom, August 15, 2016

Response 65-1

Please refer to response 17-3.

MM 4.2-1 through **MM 4.2-4** will help to reduce impacts from VOC and NOx from vehicular travel. Additionally, Project Design Features will be implemented to further reduce vehicular travel to and from the site. The motorsports operator will allow overnight recreational vehicle (RV) camping onsite to reduce the number of trips to and from the proposed Project site.

Response 65-2

Please refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 65-3

The proposed Project could likely generate an intermittent increase in demand for police services during events held on site as up to 2,620 persons could be onsite. Additional police services may be required on site for law enforcement, peacekeeping, crowd control, and potentially traffic control on the affected roadways. **Section 4.13, Traffic and Circulation**, discusses a traffic and control plan that would be required as part of the proposed Project and would address the need for additional traffic control personnel. The proposed Project would be required to develop a traffic control plan which requires detailed provisions for traveler information, a signage plan, traffic control personnel, and entry gate operations. As a result, the proposed Project would not degrade existing facilities provided by the Lompoc Police Department to serve the needs of the proposed Project.

Response 65-4

Please refer to Topical Response 8 and response 13-3 regarding alternative drop zone sites within the Lompoc Airport boundaries.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 65-5

The proposed Project would include the development of a shallow well (less than 100 feet deep) to access ground water for the purpose of dust mitigation. As mentioned in Section 3.0 of the Draft EIR, this well would be on City property and be drilled at the sole discretion of the City.

Response 65-6

Please refer to response 65-1.

Response 65-7

Please refer to response 65-4.

Response 65-8

Please refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 65-9

Refer to Topical 7 for a full discussion regarding noise methodology.

Response 65-10

Please refer to response 65-3.

Response 65-11

Please refer to response to comment 13-1.

Response 65-12

Refer to Topical 7 for a full discussion regarding noise methodology. In addition, because the Park is funded with State parks grant funds, OHVs must have a stock exhaust of a CARB approved after-market exhaust that meets California Standards for the year of motorcycle or quad to be ridden in the Park. As the facility would be able to control the use of vehicles, it is assumed that the Park would prohibit any vehicles retrofitted with after-market mufflers and that did not meet manufacturers specifications.

Response 65-13

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 65-14

Please refer to response 17-3.

Section 7.2 of the Draft EIR, Significant Irreversible Environmental Changes, summarizes Air Quality impacts evaluated in Section 4.2, Air Quality of the Draft EIR; it does not evaluate any additional impacts.

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AUG 15 2016

Planning Division

Lucile Breese, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, CA 93436

August 15, 2016

RE: Lompoc Motorsports Project DEIR

Please accept my comments to the DEIR for the Lompoc Motorsport Project. Because of the many inconstancy in the DEIR I feel that Alternative 1- No Project Alternative/No Development is the only choice. 66-1

Cultural Resources: This project will be blight on the entrance to our community. For many years people have hiked along the river bed, and in years passed swam in the river. The potential for environmental accidents along the river should prevent this project from moving forward. 66-2

Noise: Noise from the cars arriving at the site, noise from the racing, noise from the spectators will all impact the surrounding area in a negative way. The noise study seems seriously flawed, and another study needs to be conducted to determine the real impact on the community. 66-3

Air Quality: The DEIR admits that the Project's operational impacts on air quality would be significant, in fact would exceed Santa Barbara Air Pollution Control District thresholds. Add the proposed thousands of visitors to the project will insure that air quality will suffer. This project will also increase smog emissions 66-4

Geology and Soils: Grading of the banks of the river bed will be seriously impacted when they develop the race track. Plant life would be destroyed, as would animal habitat. The use of hazardous materials will have a disastrous impact on the Santa Ynez Riverbed and surrounding area. 66-5

Land Use & Planning: The DEIR entirely ignores the 2011 Airport Master Plan Update. The DEIR ignores California Safety Compatibility guidelines.

The project plans to pave over a large piece of open space with cars, oil, portable toilets, equipment and many more uses that will have a negative impact on open space. 66-6

Water: This site is in the 100 year flood zone of the Santa Ynez River. In past years this whole area has flooded. This project will use large light pools 66-7

that would need to be removed during a flood. If they are incased in cement that would be impossible in a short period of time. The Santa Ynez River is critical habitat for a number of endangered species that require protecting. A project of this scope would seriously disrupt or destroy their habitats. 66-7

Traffic: Adding large numbers of people to already overloaded streets will create a traffic nightmare. Safety will be compromised, and the potential of traffic accidents increased. There is no possible way to create a safe, smooth traffic flow into or out of this project. 66-8

Quality of Life: A project of this scope will seriously threaten the quality of life of thousands of residents who will be forced to listen to the noise of the raceway. Add to that the devaluing of property values because no one would choose to buy/live by an active raceway will have a major economic effect on homeowners and the community at large. Lights from this project will impact neighboring businesses, homes and traffic. 66-9

The loss of revenue from the existing Sky-Diving operation will hurt one of the most thriving businesses in Lompoc. The City of Lompoc accepts federal funding, so is required to make the Airport facility available to all aeronautical activities, including parachuting or skydiving. 66-10

This project will also have a negative impact on active\ agriculture next to the site. 66-11

Thank you,

Joyce Howerton
588-0928

Letter No. 66: Joyce Howerton, August 15, 2016

Response 66-1

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 66-2

The comment indicates concerns about the river bed but provides no information on potential impacts to cultural resources.

Response 66-3

Section 4.10 of the Draft EIR evaluates noise impacts from both roadways noise (vehicles traveling to and from the site) and on site noise from motorsports park events. Refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 66-4

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 66-5

Please refer to response 64-2 regarding grading and stormwater runoff.

Additionally, refer to response 49-4 regarding impacts to habitat and vegetation.

Response 66-6

Please refer to response 17-2 regarding land use compatibility.

Response 66-7

Please refer to response 57-4 regarding flood hazards. Additionally, please refer to Topical Response 2 regarding biological resources. The Draft EIR analyzed impacts to biological resources and found that with the incorporation of mitigation, impacts would be less than significant.

Response 66-8

Please refer to response 29-5 regarding traffic.

Response 66-9

"Quality of life" is not a threshold identified specifically by the City for evaluation by itself.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Response 66-10

According to Section 15131, Economic and Social Effects, of the State CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. No further response is necessary.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 66-11

Please refer to response 43-11 regarding agricultural land.

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AUG 15 2016

Planning Division

Breese, Lucille

From: Karen Hughes [karenhughesssb@gmail.com]
Sent: Monday, August 15, 2016 10:21 PM
To: Breese, Lucille
Subject: EIR Motorsports Park

After reviewing the EIR for the proposed motorsports park, I feel there are several issues that need more thorough consideration. 67-1

First is the issue of noise. It appears the EIR noise study is seriously flawed and not nearly adequate. I live in the Purisima Highlands neighborhood which is less than a mile from the proposed park. According to the sound study, the ambient noise in my neighborhood is equivalent to a freight train. I can tell you first hand this is not correct. So if the baseline ambient noise is incorrect, it presents a very skewed impact from the park. I believe this study needs to be done again.

Again with the issue of noise, according to the EIR the decibel level expected from the motorsports park will be equivalent to a vacuum cleaner. If that is indeed true, which I don't believe it is, that is still too loud and annoying for anyone who wishes to enjoy their property in peace and quiet. 67-2

It appears only four vehicles were tested for noise. What kind of vehicles? What was the distance from the tailpipe of the sound measurement? Why were motorcycles and off road vehicles not tested? Why only four vehicles? Are we not expecting quite a bit more than four vehicles at a time to be using the park?

It also appears the sound sensors placed near the Purisima Highlands neighborhood were strategically placed in areas that are protected from wind and therefore sound waves. This neighborhood is up on a Mesa and many of the homes are two story. Most of the bedrooms of these homes are on the second floor. What would the sound be like from there?

Also was wind considered in the sound study? The prevailing winds in Lompoc generally blow off the ocean and move northwest. The wind carries sound very effectively. Was this study done on a calm or windy day. What was the direction of the wind when the study was done and what mph was the wind?

Secondly there is the issue of air quality. This does not appear to be something that can be mitigated. It is not only the issue of the vehicles using the park, but also the increased traffic on the roads through town and beside neighborhoods. 67-3

Thirdly the traffic. If this park is as wildly successful as its organizers say it's going to be, the traffic through town will be very impacted especially on already busy intersections of Central and H Street, La Purisima Road and H Street, Harris Grade Road, and Ocean and H Street. These intersections already back up terribly at peak times. George Miller Drive - which is the access to the airport off of H Street - will be backed up with vehicles and toy haulers trying to enter and exit the park. This will impact the airport for people who actually use the airport for its intended purpose which is aviation. The intersection of George Miller Drive to H Street is a very dangerous turn both right and left due to the high speed of traffic on H Street at this point and the very low visibility due to a pedestrian fence along H Street. Especially dangerous would be multiple vehicles hauling trailers trying to exit George Miller Drive. 67-4

1

Fourthly - speaking of trailers and campers - it appears they will be allowed to camp in the motorsports park area overnight. This will potentially have an impact on the environment with trash, raw sewage, oil and gas seeping into the soil. How will this be monitored and maintained? Will there be generators running all night? What about the sound from generators and the impact that will have on the surrounding neighborhoods? 67-5

Fifth - the retention ponds proposed in the park. What will be done with the contaminated water? Will it be leaching into the groundwater? This site is next to a riverbed. Will the contaminated water eventually make it out to the ocean? 67-6

Sixth - The issue of the proposed site being on airport property raises a lot of potential problems which did not receive adequate attention in the EIR. Most obviously is the fact that it will impact and interfere with aviation already being conducted at the airport, and with future aviation activity. This is not something that can be mitigated by moving the skydive drop zone landing area to a less desirable place. Airports receive federal funds for the purpose of aviation and aviation should be the first and foremost priority at any airport. Moving the skydiving landing area looks good on paper, but the reality of it is that there will be many more obsticles and distractions for skydivers which will put them at greater risk. 67-7 Also something completely missing from the EIR is the fact that the majority of this park is proposed in an airport safety zone that explicitly discourages large gatherings of people - such as stadiums or grandstands. This is for the safety of the people on the ground from aircraft accidents. Another issue is the proposed lighting right next to an active taxiway and runway. Sure the lights will be directed towards the ground, but that doesn't change the fact that it will be more lit up than the runway, and therefore distracting and possibly confusing to pilots flying and landing after dark. 67-8

Seventh - What about the impact on our Fire and Police departments? With increased crowds and camping at the airport, and small limited access roads to the airport property, this presents a public safety issue that has not been addressed. This is a small airport, but there is great risk with allowing so many people who are clueless about aviation onto airport property. Especially with overnight camping being allowed there. Will there be alcohol allowed and sold there? This always increases the potential for crime which will impact the Police Department. The small access roads to the park will possibly be a hinderance to the Fire Department if there are large crowds and many vehicles / trailers in the way. Racing is not without risk, and there is no question that the Fire Department / EMT will be called in at some point. 67-9

These are just a few things I feel need to be looked at more thoroughly. 67-10

Thank you,

Karen H.

2

Letter No. 67: Karen Hughes, August 15, 2016

Response 67-1

Comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response 67-2

Please refer to response to comment 13-1.

Please refer to Appendix 4.10 of the Draft EIR regarding noise impacts during the winter, spring, summer, and fall seasons. In addition, refer to Topical 7 for a full discussion regarding noise methodology.

Response 67-3

Please refer to response 17-3 regarding air quality.

Response 67-4

Please refer to response 29-5 regarding traffic and circulation.

Response 67-5

Please refer to response 35-6.

Additionally, please refer to response 60-9 regarding noise of generators.

Response 67-6

Please refer to response 63-2 regarding the infiltration basins.

Response 67-7

Please refer to response 29-7 regarding airport safety.

Additionally, please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB).

As discussed, the sky diving drop zone would need to be relocated which is subject to FAA review and approval, and if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 67-8

Please refer to response 29-7 regarding airport safety and lighting.

Response 67-9

Please refer to response 62-7 regarding impact on fire and police departments.

Response 67-10

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Breese, Lucille

From: Jan Kays [dean.kays@verizon.net]
Sent: Saturday, August 13, 2016 11:37 AM
To: Breese, Lucille
Subject: Response to proposed Lompoc Motorsports Park

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AUG 15 2016
Planning Division

Response to proposed
Lompoc Motorsports Park

As a resident of Glen Ellen in Lompoc, both my husband and I have grave concerns about the Motorsports Park proposal. After extensive reading of the information available, our first concern is that there seems to be a lot of conflicting information as to the hours, access and the premise that it is a plan 'for the kids'. 68-1

1) We both have experience with motorsports racing. I grew up with a brother that raced cars, my husband was a mechanic.
   a. Alcohol - It's stated that alcohol sales will be restricted to certain times (evening races from what I could tell). In reality, participants bring their own alcohol, only the spectators purchase alcohol at the race venue. 68-2
   b. After race – Our experience is that after the races, racing continues on the streets. Challenges, 'grudge' races, etc. outside of the restrictions of the raceway. 68-3
   c. Traffic – as we understand it, the proposed entrance will be off of H street (no traffic light yet), and a secondary off Central at 'V' Street. Two of the most highly traveled streets in Lompoc with the highest speeds. And handily, Central has a great straight road for racing. As we can attest to now with unauthorized late night racing. 68-4
   d. Environmental – Lompoc is a naturally beautiful and an environmentally aware community. Nothing goes against this philosophy more than a motorsports park. The amount of dirt, fumes, emissions, vibration, fuel, garbage, and reduction of air quality as a result of racing vehicles and proposed events of 1200-3000 spectators would be huge. 68-5 Not just the event itself, but the amount of additional traffic it would generate. 68-6
   And then there would be the results of spills and accidents, even explosions, and separately, the loss of habitat. That once taken, cannot be restored according to the reports. 68-7
   e. Noise – For reference: sitting in our house in Glen Ellen, we can hear practice shooting at the Lompoc Penitentiary shooting range, not to mention the parachutes opening and peoples' yells (or screams as may be) as they sky dive. To propose a venue with multiple motorsports operating less than a mile from our house, having 1200+ spectators and the traffic, operating from 9 a.m. until midnight; can it really be believed that the noise will be minimal? 68-8

      The fact that the official reports states that noise is within adequate range has to be questioned when common sense says otherwise.

      A note: How would the traffic and noise affect the animals at LaPAWS adoption center at Central and V? Is there a proposal to move the center? As a volunteer there, I can state a shelter's major role is to try to make stressed and traumatized animals feel safe so they can be adopted. Loud noise is not calming, especially if it is continual and lasts late into the night. 68-9

   f. Question - Has anyone done a study of such a project on the impact on property values? The ramifications for residents personally could be considerable. 68-10

1

We both have no problem at all with growth, or with the proposed motorsports park, but having one in the middle of a highly residential area seems inappropriate and totally without consideration of how the benefits of such a park can possibly outweigh the degradation of the residents' quality of life. 68-11

Common sense says to find a better location. 68-12

Sincerely,

Dean and Jan Kays
1305 Glen Ellen Lane
Lompoc, Ca 93436
735-4662

2

Letter No. 68: Dean and Jan Kays, August 15, 2016

Response 68-1

Section 3.0, Project Description, of the Draft EIR explains the hours of operation as proposed by the applicant. Should the City decide to proceed with the proposed Project, it can modify the hours and set forth any other conditions beyond mitigation measures adopted for the proposed Project to comply with.

As noted in the Draft EIR Section 3.0, Project Description, the George Miller Drive access point would be used for weekday access, private rentals for nonracing event access, and all emergency vehicle access to the Project site. The V Street access point would be used for weekends, holidays, and special event access.

Response 68-2

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 68-3

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 68-4

Please refer to response 68-1 regarding site access.

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 68-5

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents, as well as species. With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant.

Response 68-6

Please refer to response 29-5 regarding traffic impacts.

Response 68-7

The Draft EIR address safety concerns and hazards in Section 4.7, Hazards. Additionally, please refer to response 16-3.

Please refer to response 49-4 regarding loss of habitat.

Response 68-8

Please refer to response to comment 13-1.

In addition, please refer to Topical 7 for a full discussion regarding noise methodology.

Response 68-9

Weekday and weekend noise levels with and without the proposed Project were analyzed along Central Avenue. Although noise levels may increase, exterior noise limits would not be exceeded and there would be no impact.

As analyzed in Section 4.10, Noise, of the Draft EIR, sensitive receptor number 16 looked at noise impacts to the animal shelter. For all three scenarios, (Drag Strip Racing, Drag Strip Racing and OHV Trail Ride Area, and OHV Riding) noise did not change from the measured ambient sound levels and therefore there would be no noise impacts to the animal shelter from the proposed Project.

Response 68-10

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 68-11

“Quality of life” is not a threshold identified specifically by the City for evaluation by itself.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 68-12

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

RECEIVED

AUG 15 2016

Planning Division

City of Lompoc
Economic Development—Planning Division
100 Civic Center Plaza
Lompoc, CA 93438-8001
Attention: Lucille Breese, AICP, Planning Manager
Phone: (805) 736-1261
Comments may also be sent by email to l_breese@ci.lompoc.ca.us and should include "Lompoc Motorsports Project Draft EIR" in the subject line

Subject: Comments for the Motorsports Project Draft EIR

Below are my comments on the subject EIR arranged by section, title and or page and paragraph #.

Section 3.0, Project Description

Project Objectives

The State CEQA Guidelines require an EIR to include a statement of the objectives of the proposed Project that address the underlying purpose. The objectives **as written** of the proposed Project are as follows:

- Provide compatible recreation opportunities adjacent to the Lompoc Airport, including a variety of motorsports activities for both professional and amateur motorsport users.
- Reduce illegal riding in Santa Ynez River bed and street racing.
- Provide for ongoing recreational uses for skydiving and improve existing skydiving landing areas.
- Minimize environmental impacts on natural resources, the airport, and neighboring residents.
- Redevelop underutilized lands that are in need of remediation and restoration along the Santa Ynez River.
- Provide for the opportunity to implement mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project, including the restoration of approximately 7.1 acres of riparian vegetation.
- Provide increased economic activity to Lompoc-based businesses from events at the completed Project through the use of the surrounding public and private recreation areas and businesses by patrons and attendees.
- Preserve and/or minimize impacts to existing airport tenants, operations, and users.
- Improve Runaway Safety Zones.

69-1

Comment: The above Project Objectives DO NOT provide an honest objective of the intent of the project. The State CEQA Guidelines state that information presented in the EIR be factual, adequate, and complete. The above objectives are not factual, adequate or complete and do not match any of the previously submitted information leading up to this DEIR. These objectives also appear on page 2.0-8 under Off-Site Alternatives. The following will explain why:

Specifically: "Provide for ongoing recreational uses for skydiving and improve existing skydiving landing areas." **This statement is simply NOT true. The proposed project severely limits the existing landing and greatly increases the likelihood of severe injuries to skydivers and motorsports participants.** All references to the proposed alternate skydive landing zone shown at the end of runway 07 should be removed. This was shown to be an extreme hazard to both skydivers landing on uneven surfaces and proximity to landing and departing aircraft. 69-2

Specifically: "Minimize environmental impacts on natural resources, the airport, and neighboring residents." This project will not Minimize any impacts. The devastating environmental impacts to 40 acres of habitat cannot be minimized. Impacts to the airport will be substantial – Traffic on George Miller Drive will prevent access to the airport at times by airport users and emergency vehicles, Dirt and dust will inundate parked aircraft, taxiways, runways and hangars causing severe safety hazards to aircraft and people on the ground. Neighboring residents – The project would not minimize any impacts to neighboring residents! Traffic and race noise will be an ever present thorn in their side until the lawsuits will ultimately close the facility and all the money spent by the city will have been for not. 69-3

Specifically: Provide compatible recreation opportunities adjacent to the Lompoc Airport.... First of all the use is **NOT compatible** with the Lompoc airport or its associated safety zones and secondly is on the Lompoc Airport property used for an aviation purpose NOT **adjacent** to the Lompoc Airport. 69-4

Specifically: Preserve and/or minimize impacts to existing airport tenants, operations, and users. This project would **NOT** preserve anything! And the organizers of this project have shown that they don't care about any airport impacts. This project is the worst thing that could ever happen to Lompoc Airport or <u>any</u> airport for that matter. 69-5

Specifically: "Improve Runaway Safety Zones." I think this is a misspelling. I assume the word is **Runway** not Runaway. This project would **NOT** improve any Runway safety zone but make it **much worse** by allowing a large concentration of people into a safety zone. They are called safety zones for a reason! See Caltrans ALUP Handbook dated Oct. 2011 Page 3-18 Figure 3A Example 4. For the Lompoc Airport, the Zone 5, Sideline Zone extends northward 750' from the runway centerline. Using the DEIR Page 85 figure 3.0-3 Conceptual Site Plan would put Zone 5 over most of the proposed project site. The Caltrans ALUP handbook defines Zone 5 requirements as "**Prohibit Stadiums, group recreational uses**". See Page 4-24 Figure 4F Sideline Zone. See Comment Figure 1 below which shows the Lompoc Airport Safety Zone 5 with the Motorsports project overlaid and Comment Figure 2, Safety Zone 5. As depicted, the project is almost completely covered by Safety zone 5. This is unacceptable and inconsistent with existing California State and Santa Barbara County Airport Land Use plans. 69-6

69-6

Comment Figure 1, Safety Zone 5 in relation to the proposed project.

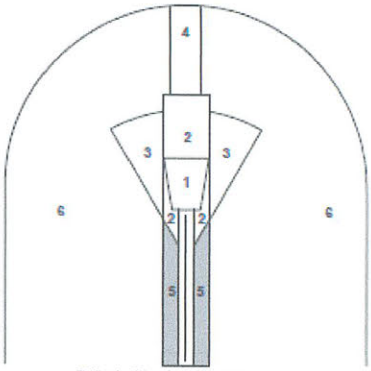
Nature of Risk

- Normal Maneuvers
  - Area not normally overflown; primary risk is with aircraft (especially twins) losing directional control on takeoff, excessive crosswind gusts or engine torque
- Altitude
  - Runway elevation
- Common accident types
  - Arrival and Departure: Aircraft losing directional control and veering off the side of the runway
- Risk Level
  - Low to moderate
  - Percentage of near-runway accidents in this zone: 3% - 5%

INITIAL LIFT-OFF OR LANDING TOUCHDOWN

Basic Compatibility Policies

- Normally Allow
  - Uses allowed in Zone 4 (subject to height limitations for airspace protection)
  - All common aviation-related activities provided that FAA height-limit criteria are met
- Limit
  - Nonresidential uses similarly to Zone 3
- Avoid
  - Residential uses unless airport related (noise usually also a factor)
  - High-intensity nonresidential uses
- Prohibit
  - Stadiums, group recreational uses
  - Children's schools, large daycare centers, hospitals, nursing homes



Refer to Chapter 3 for dimensions.

	Maximum Residential Densities	Maximum Nonresidential Intensities	Maximum Single Acre
	Average number of dwelling units per gross acre	Average number of people per gross acre	3x the Average number of people per gross acre
Rural	See Note A	50 – 70	150 – 210
Suburban	1 per 1 - 2 ac.	70 – 100	210 – 300
Urban	See Note B	100 – 150	300 – 450
Dense Urban	See Note B	See Note B	See Note B

Note A: Maintain current zoning if less than density criteria for suburban setting.
Note B: Allow infill at up the average of surrounding residential area.

FIGURE 4F

Safety Zone 5 – Sideline Zone

4-24 California Airport Land Use Planning Handbook

69-6

Comment Figure 2 Safety Zone 5

- This project would be the most devastating thing that could happen to the Lompoc Airport or any community airport! 69-7
- Project is almost entirely in the Safety Zone 5 thus putting thousands of people at risk of injury or death. 69-8
- Project would displace an aviation use for a non-aviation use thus jeopardizing thousands of dollars in income to airport businesses and surrounding community. It would mean the closure of 3 airport businesses and resulting income to the owners and employees. The FAA would most likely deny the non-aviation use. 69-9
- The alternate jump zone depicted would be a major safety concern to aircraft in the air and skydivers in the air and on the ground. Unacceptable for many reasons. 69-10

Aesthetics:

Page 2.0-11, "Implementation of the proposed Project would introduce a new source of light and glare to the site." – This paragraph does not address the light glare associated with aircraft operations and no data is provided concerning light and glare to aircraft. Less than significant may not be the case. 69-11

Air Quality:

Page 2.0-12, "Temporary emissions associated with construction…" There is no basis for this statement other than the words "would not exceed APCD thresholds". No thresholds are cited or background for measuring construction emissions.

Page 2.0-16, The closest sensitive receptors include residential…. Furthermore, the proposed Project would not expose sensitive populations to toxic air contaminants which exceed State or SBCAPCD thresholds." This statement does not provide any basis for why it would not exceed the thresholds. No mitigation measures are required and Less than significant is not true until proven. **Additionally nowhere in the EIR does it address impacts to the Santa Barbara County Flood Control/Water District building or people located immediately adjacent to the proposed project.** 69-12

Page 2.0-17 The statement made: "The proposed motorsport park uses for the proposed Project site include OHV and drag strip use. Those uses do not generally generate substantial odors which would affect the nearby residences to the northeast and hotel/motel uses to the southeast." Again, not a true statement. The uses do generate substantial odors along with dust/dirt, tire smoke and exhaust fumes. No mitigation measures are required and Less than significant is not the case.

Biological Resources:

Biological Resources is generally covered adequately however there should be requirements to prove that the off-site mitigation land is procured and found adequate by biologists and furthermore appropriate people and agencies be identified and made responsible prior to project acceptance. 69-13

Geology and Soils: 69-14

Pages 2.0-40, and 2.0-41 A general overall comment: The project is located in what is known as a hundred year flood plain and is therefore subject to the requirements to remove all structures and items within an 8 hour notice. It is also noted that this entire area flooded in 1969 with water high enough that the Lompoc Airport runway toward the West end was under water. A plan should be in place identifying agencies and entities responsible for the removal of all items in the floodplain should flooding be imminent. 69-14

Page 2.0-35 "The proposed Project falls under the jurisdiction of the Santa Barbara Airport Land Use Plan (ALUP)...." The entire paragraph does not address Safety Zone 5 that has to do with people on the ground. See Comment Figure 1 and associated comments. This project if implemented would be in direct conflict with the ALUP and put thousands of people on the ground at risk. Mitigation measures MM 4.9-1 through MM 4.9-8 do not apply and impact with Mitigation would be unavoidable. 69-15

Land Use and Planning:

This entire section and all paragraphs fall into the category of wishful thinking! The statements made throughout this section are a willful disregard for safety of people on the ground, the fact that this project would displace an aeronautical use on the airport by a non-aviation use is unacceptable! 69-16

The proposed mitigation measures in this section are a testament to the fact that this EIR is neither factual, adequate, or complete and should be deemed unacceptable.

Noise:

A general comment: The calculations of potential noise generated by the operation of the proposed project are proven to be flawed. If this project is allowed to continue, the City of Lompoc and the project proponents should be prepared to address the massive legal outfall that will most likely occur just due to the noise element not counting the environmental, airport, FAA, and homeowners. 69-17

Dry Utilities:

Page 2.0-59 and 2.0-60 The construction of up to a 1,000-square-foot maintenance and storage building with an additional 1,748 square feet of lockers on the Airport is unacceptable! Space on the airport for non-aviation use is unacceptable. 69-18

3.0 Project Description:

Page 3.0-7, top of page, ...new 6-foot-high chain link fence would be installed at the top of the existing bank along the Project site/airport boundary. That area is <u>not</u> the airport boundary. Delete the words airport. Should be: Project site boundary. 69-19

Page 3.0-9 Skydiving Facilities – This entire paragraph is in error. The writers obviously know nothing about skydiving landing areas or safety. 69-20

Proposed Structures – The concept of storage lockers on an airport is an extremely bad idea. 69-21

Lighting:

Page 3.0-10 – Again this paragraph does not address glare and impediments to approaching and landing aircraft. This paragraph is in conflict with the lighting portion of the mitigation measures on page 2.0-11. "Each portable light would consist of a 6 kW, metal halide fixture powered by a 10.5-horsepower diesel generator and would generate 440,000 lumens. As proposed, the lighted areas by portable lights would illuminate approximately 5 to 7 acres." All those diesel generators running at the same time and 440,000 lumens will not cause glare to aircraft? The proposed portable lighting will cause noise, glare to aircraft and exhaust emissions. The APCD and FAA may have something to say about that. 69-22

Woodland Mitigation Reestablishment:

Page 3.0-21 This paragraph is in error. Not only will the project have to replant the 7.1 acres left from the runway expansion project but 1. Have to designate an area large enough to accommodate requirements for all the vegetation the project cuts down and 2. Designate an additional area to accommodate planned future airport expansion projects. 69-23

4.1 Aesthetics

Light and Glare

Page 4.1-12 This paragraph makes the following statement: "Currently, the proposed Project site does not generate sources of light and glare." This statement needs to be stricken and add instead: **"The proposed Project will generate sources of light and glare affecting approaching, landing, taxiing and departing aircraft from the Lompoc Airport."** 69-24

Scenic Corridors/Highways

Scenic Road Corridor: This paragraph needs to add the statement: **"The Lompoc 2030 General Plan, Urban Design Element clearly shows the Scenic Road Corridor extending across the H Street bridge to the south side of the river. This corridor is 1,153 feet from the proposed project boundary. The proposed project will be visible from SR1 southbound in the area opposite the 3 flagpoles to the west all the way to the south end of the H Street bridge."** 69-25

Page 4.1.16 Strongly disagree with this entire paragraph. As stated above under Scenic Road Corridor, items planned in proposed project will be of substantial height to be clearly visible from the established Scenic Road Corridor.

Threshold 4.1-3 This paragraph conflicts with earlier statements indicating that the project would not degrade the aesthetics of the project area then in this paragraph it states that the project area would not substantially degrade the existing visual character or quality of the site and its surroundings due to its proximity to the airport! They can't have it both ways. The project would substantially degrade the existing visual character or quality of the site. 69-26

Page 4.1-17 Threshold 4.1-4 Strongly disagree with this statement: ..."light emitted by on-site usage would not be substantially projected off the Project site and would be confined to the internal boundaries of the proposed Project." **The light reflected by the light standards especially along the drag strip would certainly spill outside the project boundary to the airport runway and taxiway.** 69-27

General statement about light and glare: The developers of the project need to be held responsible for light and glare that will affect the approaches, landing and departing aircraft. Aircraft moving from the landing surface making a right turn onto the north side taxiway will be starring directly into the drag strip lighting just 100 feet away! This is unacceptable. 69-28

Page 4.1.20 MITIGATION MEASURES: States: "No mitigation measures are required." This statement should read: Mitigation measures are required. 69-29

LEVEL OF SIGNIFICANCE AFTER MITIGATION states: ".... Therefore, no significant unavoidable adverse impacts relating to aesthetics and lighting would be caused by the proposed Project." This is not the case. The lighting and glare issues will need to be proven using FAA standards and until the light and glare are issues are proven to be insignificant, the project should not be approved. 69-30

Page 4.2-6 The statement: "The main sources of pollutants near the proposed Project site include mobile emissions generated from both on-road and off-road vehicles, including from air traffic and agricultural operations." Needs to read: The main sources of pollutants near the proposed Project site include mobile emissions generated from on-road and off-road vehicles, **portable lighting diesel generators,** including from air traffic and agricultural operations. 69-31

Page 4.2-22 States "The motorsports operator will allow overnight recreational vehicle (RV) camping onsite to reduce the number of trips to and from the proposed Project site." This means that the RV's will all have generators running most the night which will more than offset the limited trips. 69-32

Page 4.8-20 Threshold: 4.8-8 States "..... Impacts would be less than significant." Do not agree. This paragraph fails to mention all the other items placed or constructed on site that would impede water flow or be swept downstream causing blockage in the narrow part of the river or bridge area downstream. These items include K-rail barriers, grandstands, concession-truck, portable toilets, a timing trailer, storage containers, portable lighting systems, 60 foot lighting poles, pedestrian bridge, portable toilets, timing lights, office trailer, training trailer and storage containers. 69-33

4.9 LAND USE AND PLANNING

Page 4,9-1 Paragraph entitled Existing On-Site Land Uses: This paragraph fails to mention that this site has been the Lompoc Airports skydiving drop zone or landing area for 19 years! Please add that use as it has been the main use of that area and developed as such. 39-34

Page 4.9-2 Under Surrounding Land Uses – First bullet. Need to delete an incorrect statement - The Lompoc Airport allows both vehicle and pedestrian access onto the runway and taxiways from the riverbed. This is incorrect. 69-35

Page 4.9-3 Last bullet under Surrounding Land Uses: All the measurements cited in this paragraph are incorrect! This paragraph should be written as follows:

The nearest residential neighborhoods from the proposed Project site are La Purisima Highlands to the north, via SR-1, and River's Edge Estates via West Central Avenue, each approximately ~~.65~~ .54 miles away. Each neighborhood's Land Use Designation is Low Density Residential and the zoning designation is Single Family Residential 7,000 square feet (sf). The closest residence in Vandenberg Village is located ~~2.5~~ 1.4 miles from the proposed Project site. Mission Hills and Mesa Oaks residences are located approximately 2.0 miles and 1.0 mile from the proposed Project site, respectively. The closest homes to the south are the Meadows, Glen Ellen and Stone Brook Estates at .41 mile, the Willows at .49 miles. 69-36

In closing, I sincerely hope and pray that this project will not move forward and waste any more of our city's precious time, money and efforts. As my focus is on impacts to the airport and safety concerns for users and spectators due to aircraft operating in close proximity to large numbers of people, I still feel sorrier for the many residents of this community that will be greatly affected by this ill-conceived project if by some wild happenstance it became a reality. Thank you, 69-37

Ed Mandibles

805 291-6039

emandibles@gmail.com

Letter No. 69: Ed Mandibles, August 15, 2016

Response 69-1

As stated in the CEQA Guidelines Section 15124: The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

(a) The precise location and boundaries of the proposed project shall be shown on a detailed map, preferably topographic. The location of the project shall also appear on a regional map.

(b) A statement of the objectives sought by the proposed project. A clearly written statement of 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.

(c) A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.

(d) A statement briefly describing the intended uses of the EIR.

Response 69-2

Please refer to response 29-7 regarding airport safety.

Additionally, please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB).

As discussed, the sky diving drop zone would need to be relocated which is subject to FAA review and approval, and if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 69-3

Please refer to Response 42-1 regarding impacts to loss of arroyo willow thicket, response 29-5 regarding traffic, and response 29-7 regarding hazards and airport safety.

Additionally, Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 69-4

Please refer to Response 29-7 regarding airport safety.

Response 69-5

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents, as well as species. With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant.

Response 69-6

Please refer to Response 29-7 regarding airport safety.

Section 3.0 of the Final EIR shows the corrected change from “Runaway” to “Runway”.

Response 69-7

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 69-8

Please refer to Response 29-7 regarding airport safety.

Response 69-9

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 69-10

Please refer to Topical Response 8 regarding the operation of Skydive Santa Barbara (SDSB).

As discussed, the sky diving drop zone would need to be relocated which is subject to FAA review and approval, and if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 69-11

Please refer to Response 29-7.

Response 69-12

Section 4.2, Air Quality, of the Draft EIR evaluated impacts associated with Air Quality Impacts. **Table 4.2-6, Mass Daily Emissions Thresholds**, identifies SBCAPCD thresholds to determine the significance of impacts to air quality during project operation. Please note the SBAPCD does not have quantitative thresholds of significance in place for short-term or construction emissions. As indicated in **Table 4.2-6**, SBAPCD uses 25 tons per year for ROC, NOx, or PM10 as a guideline for determining significance of construction impacts. Due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "hotspot" analyses are not required. The proposed Project would result in a potentially significant impact if it would emit more than 25 pounds per day of NOx or VOC from motor vehicle trips only.

Please refer to response 13-1.

Response 69-13

Please refer to response 42-1.

As noted in the Draft EIR Section 4.3, Biological Resources, implementation of the proposed Project would result in the loss of 14.5 acres of arroyo willow thicket due to grading excavation. This acreage includes 0.5 acres of arroyo willow thicket that currently exists within the Runway Expansion Project mitigation area that has been previously designated on site; however, as noted above, the mitigation for the Runway Expansion Project was not successful. Loss of the arroyo willow thicket habitat is considered a significant impact. The Draft EIR identifies mitigation measure 4.3-1 to reduce impacts related to the biological resources. Off-site mitigation will be implemented at a 5 to 1 ratio for a total of 72.5 acres (14.5 acres of impacted arroyo willow thicket at a 5 to 1 ratio equals 72.5 acres). A Restoration and Mitigation Plan (Plan) will be developed and require a success criteria be included in addition to quarterly monitoring visits during the first year, biannual visits during the second and third years, and annual visits during the fourth and fifth years.

Response 69-14

Please refer to response 40-4. Impacts associated with flooding would be considered less than significant.

Response 69-15

Please refer to response 17-2 regarding land use issues related to the ALUP.

Additionally, please see response 29-7 regarding safety zones.

Response 69-16

Please refer to response 17-2 regarding land use issues related to the ALUP.

Additionally, please see response 29-7 regarding safety zones.

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 69-17

Please refer to Topical 7 for a full discussion regarding noise methodology. In addition, refer to response to comment 13-1 for a discussion regarding noise impacts.

Response 69-18

The commenter addresses opposition to the storage lockers and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 69-19

The chain link fence would be developed on the southern portion of the boundary which is the proposed Project site as well as airport boundary.

Response 69-20

Please refer to response 14-1 regarding relocating the skydive landing area.

Response 69-21

The commenter addresses opposition to the storage lockers and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 69-22

Please refer to response 56-9 regarding glare and Topical Response 1 regarding airport safety hazards. The Draft EIR analyzed the potential air quality impacts of the proposed Project.

Response 69-23

Please refer to response 42-1 regarding mitigation measures for impacts to biology.

Response 69-24

The proposed Project site does not currently generate sources of light and glare.

Please refer to response 56-9 regarding glare.

Response 69-25

Section 4.1, of the Draft EIR evaluated potential impacts relating to aesthetics. As mentioned, the SR-1 north of the Santa Ynez River is a designated scenic road corridor. However, as discussed in Threshold 4.1-1 and illustrated Figure 4.1-5, the proposed Project site is obstructed by existing vegetation along the Santa Ynez River. The proposed Project site would result in the removal of vegetation within the site; however, the existing vegetation along the riverbed would remain. Thus, views from SR-1 would remain similar to existing conditions and impacts from this location would be less than significant.

Response 69-26

Section 4.1, of the Draft EIR evaluated potential impacts relating to aesthetics. The Draft EIR found there would be no significant impacts relating to aesthetics including impacts that would degrade the visual character.

Response 69-27

Please refer to response 56-8 regarding lighting.

Response 69-28

Please refer to response 56-8 and 56-9 regarding light and glare.

Response 69-29

Section 4.1, of the Draft EIR evaluated potential impacts relating to aesthetics. The Draft EIR found there would be no significant impacts relating to aesthetics and as noted in CEQA section 15123.4 (3): mitigation measures are not required for effects which are not found to be significant.

Response 69-30

Please refer to response 69-29. Additionally, please refer to response 56-9 regarding glare.

Response 69-31

The statement mentioned by the commenter is in the air quality section under existing conditions. Portable lighting diesel generators are currently not on site and do not need to be included here.

Response 69-32

Project Design Features will be implemented to further reduce vehicular travel to and from the site. The motorsports operator will allow overnight recreational vehicle (RV) camping onsite to reduce the number of trips to and from the proposed Project site.

As noted in the Draft EIR, Section 3.0, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained.

Response 69-33

Please refer to Topical Response 3 regarding potential flooding impacts.

Response 69-34

The section "Existing On-Site Land Uses" the commenter is referring to describes the biological conditions of the existing land uses. In the following section, on page 4.9-2, "Surrounding Land Uses", Sky Dive Santa Barbara is mentioned.

Response 69-35

The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 69-36

Measurements were taken from the center of the proposed Project Site and as mentioned, all measurements are approximate.

Response 69-37

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Breese, Lucille

From: Ann [amickadeit@gmail.com]
Sent: Monday, August 15, 2016 7:19 AM
To: Breese, Lucille
Subject: No motor sports park

RECEIVED
AUG 15 2016
Planning Division

>> I am against motor sports park. 5.+/
>>
>> Aesthetics/Visual: a)Sun reflection on hundreds of windshields of
>> rvees, hundreds of parked cars will ruin views from many angles of
>> vision. b) Dust clouds will impair vistas from all angles. c)Some
>> users bring semi truck trailers to these facilities with welding facilities that will add to the visual blight d)Night star views will be impaired by stadium like lighting. Type of lighting not clearly delineated in study. 5.+0
>>
>> Air Quality: a) Many Lompoc residents have illegally converted emissions devices on their cars. These cars already race on our streets. This is your typical user of "park." Air Resources Board is so notified by LVNA.
>> b)Tire fires will occur. c)Hundreds of visitors vehicles will be
>> added to our valley. c)MOST side rail users in the mud bog will
>> employ PRE SMOG Volkswagen engines. THESE ENGINES HAVE NO SMOG DEFLECTION EQUIPMENT AND POLLUTE 100X more than one MODERN CAR. There will be hundreds of these vehicles operating twelve hours a day 365 days a year. WHAT DO PROPONENTS SAY ABOUT THEIR 'SPECIAL EVENTS DAYS.' This report does not address that and is therefore CANNOT BE CERTIFIED. IT IS INCOMPLETE. Were the type of engines delineated in this bare, bare report? 5.+1
>>
>> Biological Resources: Pollution of soil and run off into riparian
>> habitat will impact willows and other protected species of all types down river and contiguous. See endangered species list for this environmentally sensitive area. 5.+2
>>
>> Cultural Resources: Will downgrade the general environment-- particularly planned space museum. Is it harder to concentrate on any matter with EXCESSIVE NOISE. Studies say YES. Loud cars don't mix with the stars.... or the study of the heavens. 5.+3
>>
>> Geology and soils: Soils will become polluted quickly. Will affect all matter of plant life. Banks of river will be impacted by grading for track. By volunteers? 5.+4
>>
>> Greenhouse Gas: Affect on carbon footprint is obvious with the use of
>> many presmog or illegal vehicle 5.+5
>
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>

1

Letter No. 70: Ann Mickadeit, August 15, 2016

Response 70-1

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary

Response 70-2

Please refer to response 56-9.

Response 70-3

Please refer to response 56-10.

Response 70-4

Please refer to response 56-11.

Response 70-5

Please refer to response 56-12.

Response 70-6

Please refer to response 56-13.

Response 70-7

Please refer to response 56-14.

Breese, Lucille

From: jason osborne [jason.lonestar@gmail.com]
Sent: Sunday, August 14, 2016 8:55 PM
To: Breese, Lucille
Subject: Motorsports Draft Environmental Impact Report Comments
Attachments: Noise_v1.2.pdf; Other_v1.2.pdf; summary comments DEIR_Osborne.pdf

Ms. Breese,

My name is Jason Osborne and I am a Lompoc resident.

Please find attached to this email three PDF files.

The file labeled "summary comments DEIR_Osborne" is a brief overview of the files labeled "Noise_v1.2" and "Other_v1.2".

A more in-depth analysis of the proposed park, and commentary, can be found in the "Noise_v1.2" and "Other_v1.2," files.

71-1

Regards,
Jason Osborne

RECEIVED

AUG 15 2016

Planning Division

1

Comments regarding the Draft Environmental Impact Report (DEIR).

As written, the DEIR is in direct violation of the Lompoc 2030 General Plan Noise Element. The noise element of the general plan specifically states that the areas affected by aircraft noise shall not exceed 60dB Leq, at the emitting property boundary. The DEIR shows that the noise outside the property boundary in all simulations will be in excess of 85dBA. To meet the noise element requirements this project must require mitigation strategies to limit the effect of noise and contain the noise effects within the property boundary. Until the noise element of the general plan is satisfied then the DEIR should not be certified or approved.

In addition to the above violation of the general plan, the DEIR noise study is inaccurate and incomplete. The noise study is inaccurate in that the data used to determine ambient noise levels for areas outside of the project boundary use 15min Leq levels as determined near the edge of the roadway at one of the busiest intersections in the city (H and Central at 9AM) and does not use actual ambient noise levels for 12 of the 16 sites in the modeling. Setting the ambient noise levels of the areas modeled around the project to 72.3dB Leq falsely inflates the background ambient noise levels to such a degree that the impact of noise from park operation is rendered insignificant. The background levels for modeled areas must be corrected to reflect accurate noise levels. Until this is done the modeling is inaccurate and incomplete.

71-2

The noise study element of the DEIR is also incomplete in that there is no definition of method used to measure vehicle noise levels showing that the data conforms to the method defined in the Off-Highway Motor Vehicle Recreation Act of 2003. The noise element states that the noise of vehicles used in the models were captured from “pass-by runs,” not that the noise levels were measured at a distance of 20” from the vehicle. The method and noise levels recorded during this testing must be published, or the noise element will remain incomplete.

Estimated noise levels from park operation used in the noise element modeling are inaccurate. The Off-Highway Motor Vehicle Recreation Act of 2003 allows noise levels for OHVs to be 96dB – 101dB dependent upon model year. The park, as proposed, can support 24 OHV motorcycles at one time. If the noise output of each motorcycle is assumed to be 92dB, well below the 96dB allowed on the lowest end of the specification, then the combined noise output level is 105.8dB. None of the models used in the noise study reflect the expected noise levels from park operation at more than 95dB maximum. Since the levels used in the models do not accurately reflect the expected noise levels from park operation, all of the noise models are inaccurate.

The sound models in the noise study manipulate both sensitive receptor model locations, as well as the emitter type, in an effort to minimize the impact from the noise generated from park operation. This manipulation is another inaccuracy in the sound models. Specifically, sensitive receptor site locations 8 and 9, are chosen in such a way to minimize the impact of park noise by placing them behind geographic features that block emitted park noise. This is made obvious by inspecting the sound pressure model maps, in that small change in position from behind these obstructions for sites 8 and 9, will increase the noise levels by approximately 5dB, which will more accurately reflect the noise impacts that will affect the Purisima Highlands subdivision. Model emitter types are also manipulated through the choice of a “line array” emitter, as opposed to “point source” emitter, for the drag strip sound models. The use of the line array for

the drag strip models appears to show that the energy of the line array is directed in such a way as to minimize noise impacts. This is visible via inspection of the sound pressure maps which show that the peak levels for the drag strip models are lower than those used in the OHV only models. An accurate emitter type for drag strip models must be used or the sound models will remain inaccurate. 71-2

In addition to the failures in the noise study, several issues still remain with the Aviation Element, the Air Pollution element, habitat restoration, economic growth vs water usage, and the use of the pit areas as an impromptu RV park. 71-3

The Aviation element appears to be a case of "ask for forgiveness, not permission," as the airport is currently awaiting the adoption of a new Draft Airport Land Use Plan (DALUP) by end of 2016, but the aviation element specifically states it is ignoring the implications of this DALUP to the proposed park. This draft plan will be in place well before the park is fully built and will put the park into direct conflict with the DALUP as the entire park will be within ZONE 5 which is an area where group recreation areas are prohibited. The park will also require the relocation of a landing zone for a sky diving business. This relocation will result in a landing area that is so small that only the most experienced sky divers can utilize the airport for sky diving. This will close an already existing and successful, aviation focused, business at the airport. Closing an aviation business as a result of building this park should immediately disallow this project. 71-4

Building this park will effect air quality in the Lompoc Valley to a level that is immitigable to a level that is "below significant." The city has a duty under the umbrella of protecting the quality of life of its' citizens via the public trust, given this demonstrable degradation in air quality, the park should not be allowed to be built. There is language in the DEIR that will allow the use of OHVs that have no emissions control and zero noise control on their exhaust (so called open exhaust or open header designs). This language must be stricken from the DEIR, and at a minimum, all vehicles used at the park required to be tested and meet the designations of Off-Highway Motor Vehicle Recreation Act of 2003. 71-5

The DEIR requires that the arroyo willow thicket habitat that will be removed as a result of the grading of the proposed park require a reclamation of 72 acres of habitat at predetermined survival and coverage levels. The DEIR states that the area for reclamation be of similar terrain, geography, and hydrology but fails to specify what areas near the project meet these criteria that could suitably be used for the habitat restoration. Simply stating that the restoration be done, without the identification of suitable areas that meet the criteria for habitat restoration, makes the DEIR incomplete. The DEIR must identify areas suitable for the habitat restoration. 71-6

Storm water runoff from the park is proposed to be contained within infiltration ponds within the park boundary. These infiltration ponds will allow potentially hazardous runoff from the operation of the park to leech into the groundwater that serves the citizens of Lompoc. This must not be allowed. The infiltration ponds must be lined to disallow this runoff to reach groundwater and then removed from the park for treatment and safe disposal. 71-7

As stated in the DEIR, the park proposes to use 5% of the city of Lompoc's water reserves for 0.2% growth of the city. This exchange is unacceptable. Water as a resource should not be traded for so low a growth and minimum demonstrable economic benefit. 71-8

The park proposes to allow up to 511 recreational vehicles to be parked ("camped") overnight at the pit locations of the park. There is no definition of how or who will be responsible for the 71-9

operation of this “RV park.” The DEIR must define rights, rules, roles and responsibilities for this use of the proposed park. 71-9

In summary, as written, the DEIR is inaccurate and incomplete and therefore should not be accepted and ratified. 71-10

The Noise Element

Summary: The noise study appears to have been conducted in a way that was meant to falsely reduce the effect of the operational noise of the Motorsports Park, thereby making the DEIR claims of "no mitigation necessary" patently false.

71-11

Details:

Lompoc 2030 General Plan Noise Policy Conflicts

Teasing apart the details of the noise study section of the DEIR took a fair amount of work, mostly because it appears there was a real effort to obscure the true effects of the operational noise of the park.

The first and most significant conflict that was apparently ignored in the DEIR, is that the City of Lompoc's 2030 General Plan noise ordinance states quite clearly that the noise generated at a property must meet the defined noise limits **at the noise source property line.**

71-12

Page N-9 of the 2030 General Plan noise element, policy 1.1 states "The City shall require each land use to maintain noise levels at their property line in compliance with City standards."

Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan."

Policy 2.4 states "The City shall continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line."

The maximum acceptable noise levels for any source are outlined in Table N-1 as seen below.

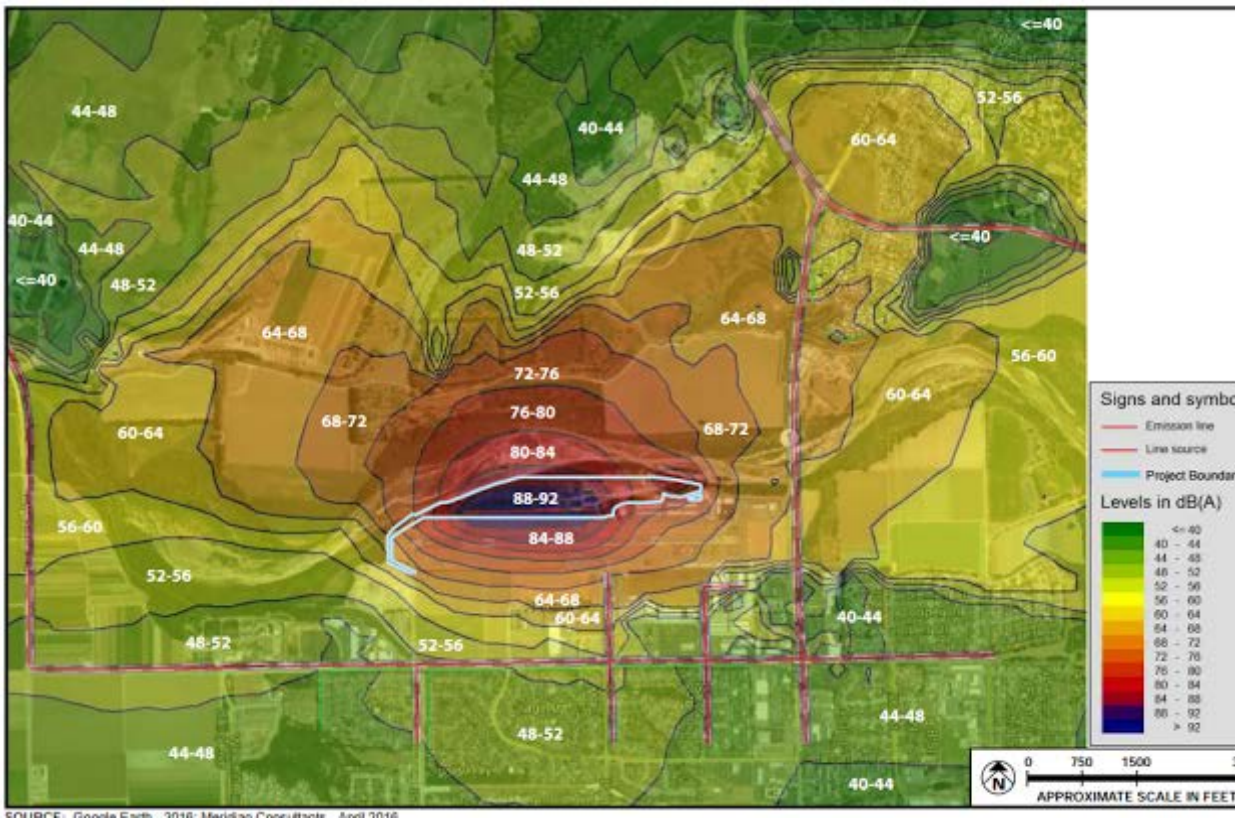
Table N-1.
Interior and Exterior Noise Standards

Land Use Categories		Ldn	
Categories	**Uses**	**Interior1**	**Exterior2**
Residential	Single Family, Duplex, Multi-Family, Mobile Home	45[3]	60[4]
Commercial & Industrial	Retail, Restaurant	55	65
	Motel/Hotel	45	60[4]
	Professional Offices, Movie Theater, Auditorium	45	65
	Manufacturing, Utilities, Warehousing, Agriculture	65	75
Community Facility	Hospital, School, Nursing Home, Church, Library, Civic Offices, Parks	45	65
Open Space	Passive Outdoor Recreation	--	60[4]

Notes
1. Interior areas exclude bathrooms, closets, and corridors.
2. Exterior areas are limited to the following: private yards or patios of residential uses; restaurant patios; motel recreation areas; office, theater, or hospital patios or assembly areas; school playgrounds; nursing home, library, or civic office assembly areas; and park picnic areas.
3. If achievement of the interior noise standards requires that windows and doors remain closed, air conditioning or mechanical ventilation is required.
4. In areas affected by aircraft noise, the standard is 65 Ldn with the stipulation that the noise level exclusive of the aircraft-generated noise cannot exceed 60 Ldn.

71-12

As can be seen from one of the sound pressure level simulations contained in the DEIR shown below, the project fails spectacularly at meeting Policy 1.1, well exceeding the 65dB noise limit at the property boundary.



Noise level contour map from DEIR.

72-12

Instead of using the legally required definition of Policy 1.1 above, the authors of the DEIR apply a particularly tortured view of the policy and push the limits for acceptable noise levels by measuring at the nearest property boundary of a "sensitive receptor." Basically they've tried to push the problem as far out as possible to avoid appearing to be in conflict with city policy by claiming that the noise isn't greater than 65dB at the
closest neighboring property lines. Even this claim is not correct, as it can be easily seen in their own sound pressure level map above, that noise levels of 64-68dB extend well into the Purisima Highlands neighborhood.

There is also a continued reference throughout the noise section of the DEIR to the 75dB limit associated with a manufacturing facility as if that 75dB noise limit somehow applies to this proposed park. This proposed location is
not zoned as commercial but "PF" for Public Facility, so it still falls under "community facility; park," at a maximum acceptable noise limit of 65dB.

The real kicker here though is "note 4" from 2030 General Plan table N-1 above, which states - "In areas affected by aircraft noise, the standard is 65 Ldn with the stipulation that the noise level exclusive of the aircraft generated noise cannot exceed 60 Ldn" So, even if someone wants to argue that the proposed park is being built at the airport which is already noisy so it shouldn't matter how loud the park is, that's simply not true. The city does recognize that it is noisy there, and as a result, stipulates that no additional noise sources in excess of 60Ldn should be allowed. Using even the poorly constructed sound level models in the noise study, the proposed park adds a noise source level of 88dB to the area outside of the project property line, which is 28dB above the "noise level exclusive of aircraft." This 28dB increase is almost **700% louder** than acceptable according to the 2030 general plan for areas affected by aircraft noise.

To wrap up this "policy section" review of the DEIR noise study, Policy 2.2 of the 2030 General Plan noise element states - "The City shall require acoustical studies, prepared by a qualified acoustical engineer, for new development projects anticipated to either: (1) result in an ambient increase of five dBA Ldn; or (2) produce noise within five dBA/Ldn of the noise standard or greater than the noise standard for the proposed land use(s) under existing or future conditions. Should noise abatement be necessary, the City shall require the implementation of mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California with a minimum of three years of experience in acoustics)." This may or may not be an issue, since the reference in the above policy of using a Registered Professional Engineer is only meant to be an example of a qualified person that would be able to prepare the noise study. However, the consultants who prepared this study do not have a single acoustical engineer (or any civil engineers) on staff, much less a Registered Professional Engineer according to the above linked online biographies. All of the technical staff of the consultants are trained and certified in some form of Urban Planning/Development and are experienced, so it could be argued that they are qualified to do the acoustic study since a P.E. isn't mandated by the noise policy, but they're not acoustics engineers. 71-12

What was measured, What was Modeled? 71-13

There was actual noise data collected and included in the noise element from cars and from static sites in surrounding locations of the proposed park area. However, the methods used to collect the data from the OHVs are not defined, and none of the noise data supplied has any sort of repeatability information or confidence intervals associated with their accuracy. In other words, the noise levels were measured only once, during one small time window, on one day, and never taken again. These values are then used throughout the document to determine the impact of noise from the proposed park. That's a very poor experiment/data collection design.

OHV measurements

According the DEIR four OHVs were measured to characterize the expected noise outputs of representative vehicles that will be used at the proposed park site. These OHVs are also noted as having met the Off-Highway Motor Vehicle Recreation Act of 2003 legislation for exhaust noise output. What is not defined is exactly what test procedure was used to characterize the noise output, other than a mention of "pass-by runs." The OHV legislation mandates that the exhaust noise measurements be taken 20 inches from the vehicle. With no definition of the actual process used here, it's possible that the data taken from the OHVs in this study were captured a distance greater than 20 inches. The measurement of noise levels has a strong and direct dependence on the distance from the source where the measurements are made. Without this data, it is not possible to know if the vehicles used actually meet the California OHV legislation for exhaust noise, as most vehicles that have had owner modifications done rarely meet the noise standards, and the data are at best poor approximations of what noise levels an OHV at the proposed park creates during operation. 71-13

The DEIR also makes mention that two OHVs had their engines revved simultaneously to replicate a "worst case scenario." No data report of those sound power levels is referenced in the document. It is possible to assume that the levels were approximately equal to 92dB, again from an unknown distance, as 95dB is the highest sound pressure level that were modeled as operational noise of the drag strip.

These sound power estimates grossly underestimate the true noise potential from the proposed park. The California OHV legislation, dependent on model year, allows for OHV exhaust noise output to be up to 96dB - 101dB per OHV. The proposed park is designed to support 24
racing motorcycles in competition events - the effective combined output noise

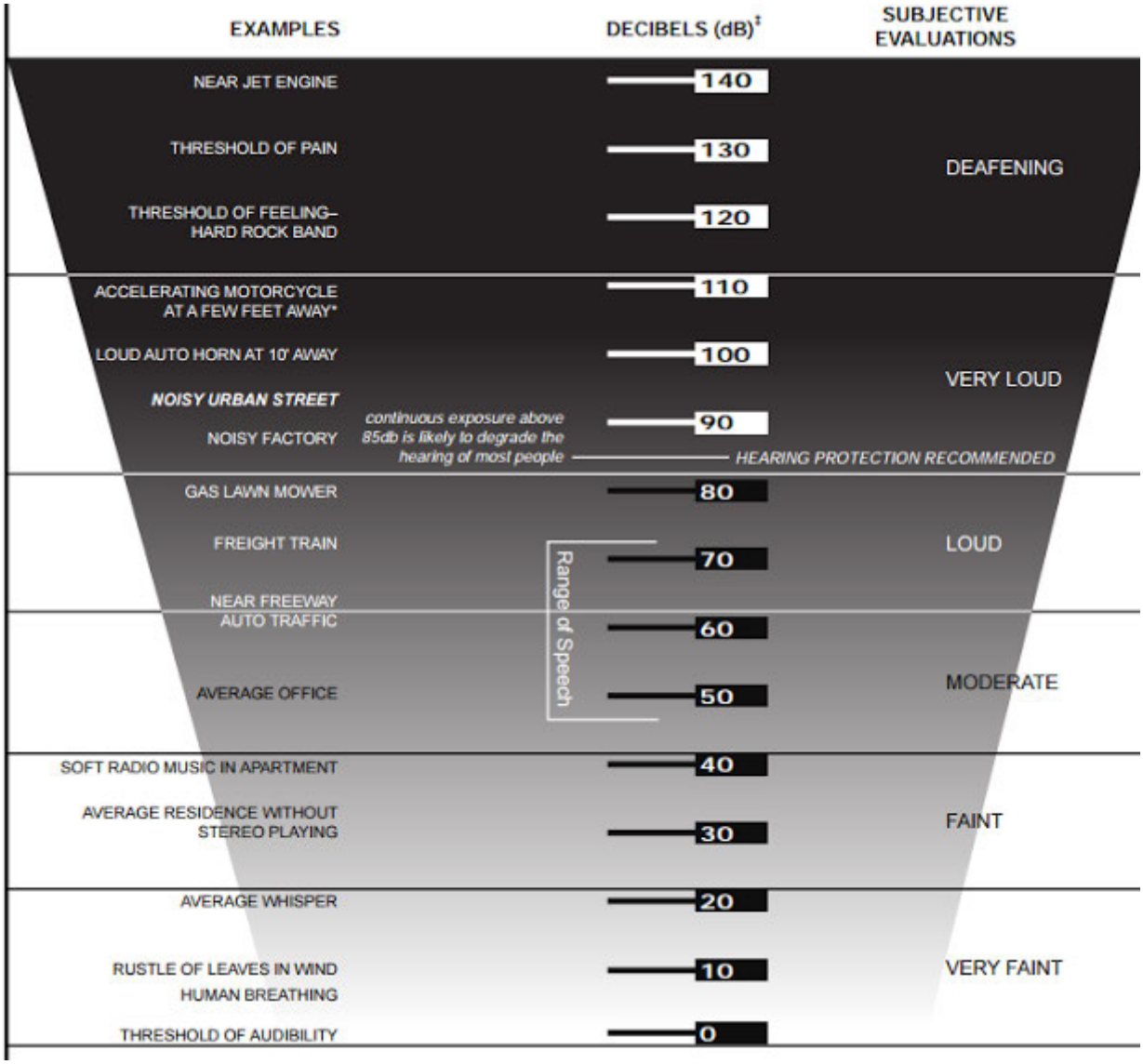
level of the 24 OHVs running simultaneously at 92dB (3dB below the lowest limit to be "nice") is 105.8dB. If you add in two drag racing vehicles at 92dB with that, the total grows to 106dB. This results in a ~13dB difference or well over **100% louder than what has been put into the model as a starting point for the noise sources.**

But wait, there's more! Somehow, in all the condescending speeches made about the vehicles running at the proposed motorsports park, the public has been continually reassured that these are just normal "street legal" cars that will be used in the events. That is not completely correct, as on page 3.0-30 in the DEIR, the vehicles to be used in the mud bog/sand drags area and special drag racing events, those OHV will not meet the legislative standard for OHVs and will instead be "open header," and/or "open exhaust." Vehicles with exhaust systems of this type easily reach 105dB with a single vehicle. 71-13

Modeled Sound Data Discussion

How loud is a freight train? ~72.3dB.
How loud does the sound model say it is most modeled neighborhoods? ~72.3dB.
Wait, what?! 71-14

That's right. The noise study says there is a freight train rolling through most of our neighborhoods, 24/7.



Noise table from the DEIR showing relative noise levels of various sounds.

71-14

How did they decide that 72.3dB was the baseline noise level?

71-15

The DEIR contains noise measurement data from five locations near the project site. The data was collected on a single day (Feb 17, 2016) between 7:54AM and 10:21AM. An "Leq" - or Level equivalent, for each location was created by averaging the measured noise levels over a 15 minute period for sites 1, 2, 3, and 5. The Leq at site 4 was created from a 1 hour average between 9:00AM and 9:59AM. There was also data collected on March 30, 2016, at site 4. This data was collected so they could include the noise from an aircraft flying over the measurement location to use as a second "baseline"

noise level in their analysis. In essence with this data, they have created an acoustical "straw man," attempting to show that the location already exceeds current noise standards.

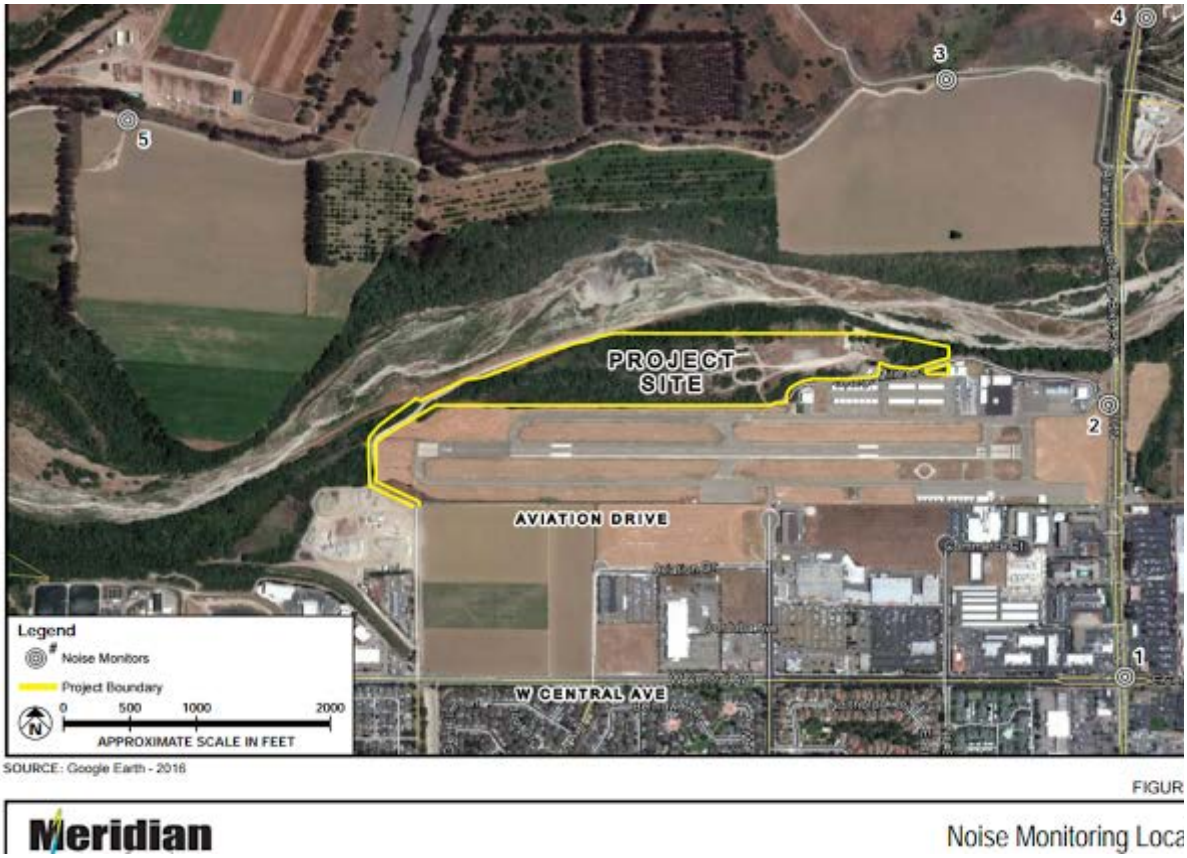
Table 4.10-3
Noise Measurements in Project Vicinity

Location	Description	Leq (15-minute)
Site 1	Northwest corner of Central Avenue & H Street	72.3
Site 2	Corner of Central Avenue and George Miller Drive	69.0
Site 3	Alan Hancock College Bike Path, north of proposed Project site	49.5
Site 4	Along N. H Street/Highway 1, west of La Purisma Highlands residential units	62.7[a]
Site 5	Agricultural farm	53.9

*Source: Refer to **Appendix 4.10** for monitoring data sheets*
Note: Noise measurements were conducted between 7:54 AM and 10:12 AM on Wednesday, February 17, 2016.
[a] 1-hour Leq from 9:00 AM–9:59 AM.

71-15

Noise table from DEIR showing Leq noise levels at areas near the proposed site.



Map from DEIR showing numbered noise measurement locations sites.

71-15

These Leq values were created so that they could be used as inputs into noise sound level models as the "ambient sound level" expected at locations near the proposed park. This is a normal practice. What is preposterous in this case is that the average sound level taken 20 feet from the center of one of the busiest intersections in the entire city (H and Central at 9AM) was used as the background noise level for 12 out of 16 of their model measurement locations. See table below.

71-16

Table 4.10-10
Drag Strip Racing (Spring)

Receptor ID	Distance from Drag Strip (miles)	Measured Ambient Sound Levels (Leq)[a]	Drag Strip Racing Sound Levels (Leq)	Future Sum of Ambient plus Proposed Drag Strip Racing[b]	Calculated Increase in Noise (dB)
1	0.42	72.3	50.3	72.3	0.0
2	0.41	72.3	51.8	72.3	0.0
3	0.41	72.3	53.2	72.4	0.1
4	0.41	72.3	53.5	72.4	0.1
5	0.50	72.3	45.9	72.3	0.0
6	0.72	72.3	43.1	72.3	0.0
7	0.66	72.3	43.7	72.3	0.0
8	0.75	62.7[c]/82.4[d]	60.8	64.9[c]/82.4[d]	2.2[c]/0.0[d]
9	0.77	62.7[c]/82.4[d]	57.2	63.8[c]/82.4[d]	1.1[c]/0.0[d]
10	1.24	53.9	39.0	54.0	0.1
11	0.98	49.5	40.7	50.0	0.5
12	0.43	72.3	63.7	72.9	0.6
13	0.47	72.3	56.7	72.4	0.1
14	0.48	72.3	48.5	72.3	0.0
15	0.23	72.3	64.2	72.9	0.6
16	0.40	72.3	51.7	72.3	0.0

Source: Appendix 4.10, SoundPLAN
[a] Levels are from measurement locations that are near the modeling locations; levels are estimated from comparable measurement locations.
[b] Predicted energy sum of the drag strip contributions to the measured existing noise environments.
[c] Without aircraft operations.
[d] With aircraft operations.

71-16

Circled areas show that 12 of 16 locations have ambient noise set equal to 72.3dB

Were the topic at hand less serious, that type of data manipulation to force the answer you want to come out of the analysis could be funny. Here though, it's not funny at all. It's simply a blatant attempt to hide the true impacts of noise from the operation of the proposed park.

To recap so far:

71-17

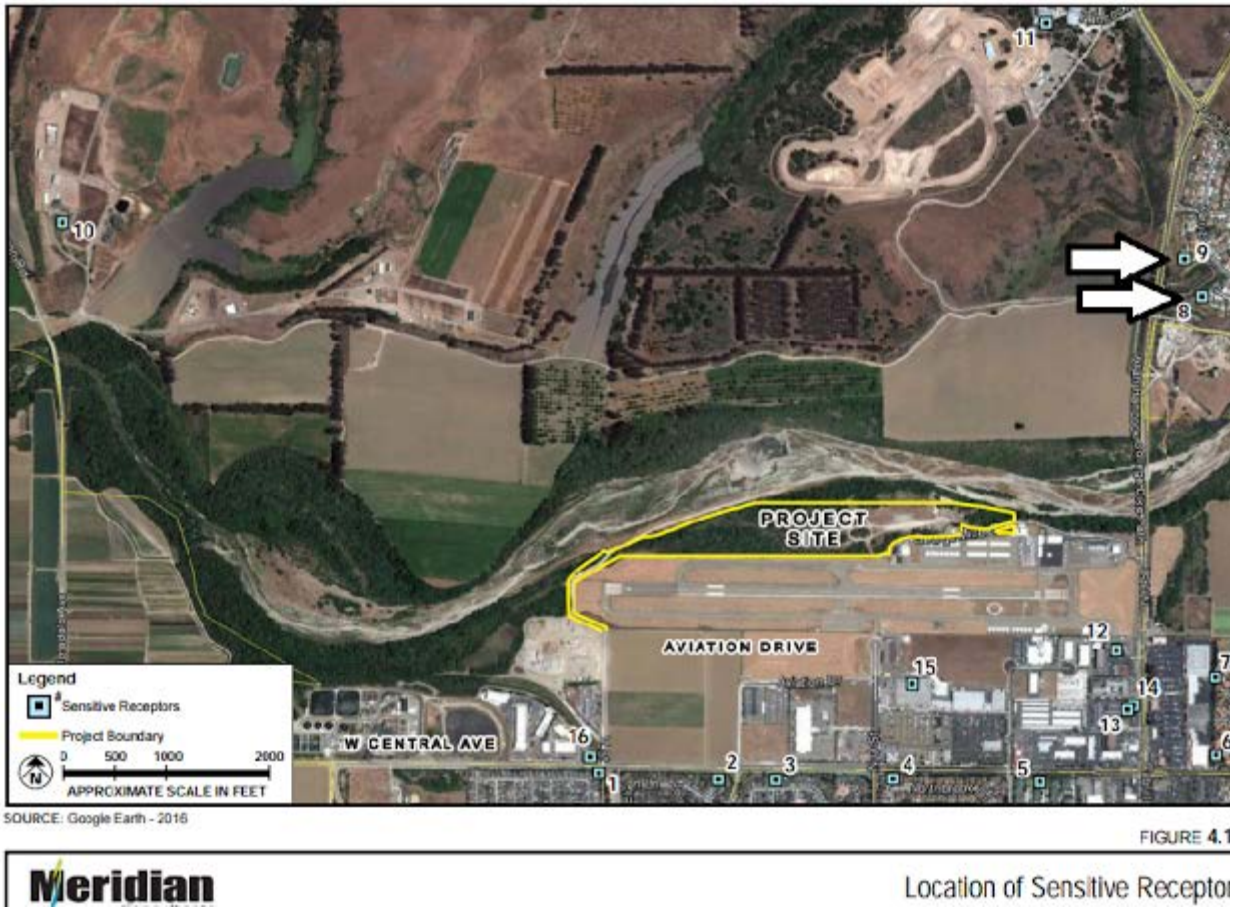
1) The ambient noise levels have been set to **unrealistically high values** for background noise at most of the locations in the model

2) The noise levels used from running vehicles in the proposed park has been set to **unrealistically low values** in the model 71-17

and now, sadly, it gets worse;

3) The locations used in the sound model near the Purisima Highlands neighborhoods appear to be purposely **placed so they measure the lowest noise levels** coming from the proposed park.

See the map below for where the sensitive receptors were placed in the sound relative to the proposed project site. White arrows added for clarity. 71-18



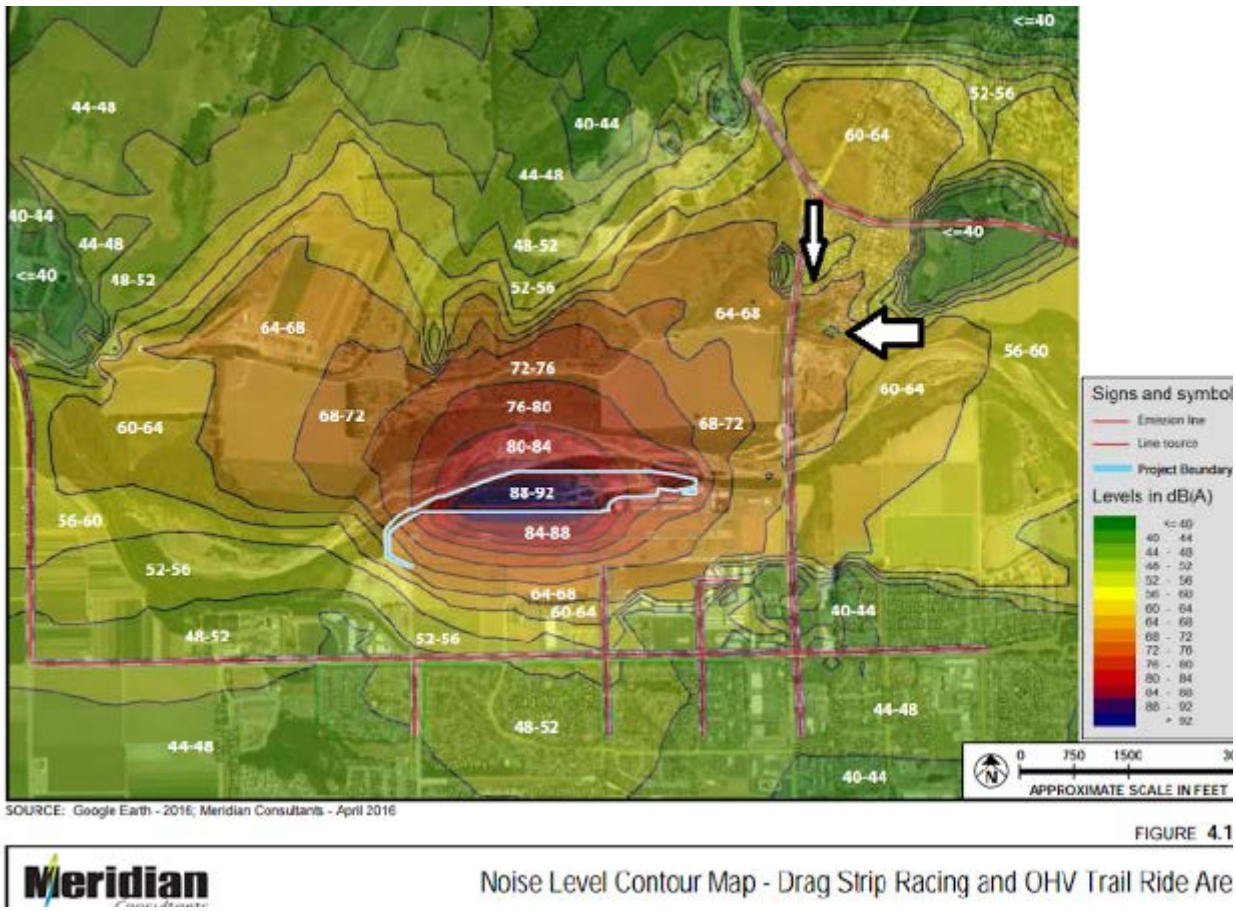
Arrows showing location of #8 and #9 sensitive receptor positions.

Compare the locations of #8 and #9 above, to the sound model map below. (Again, the white arrows have been added for clarity.) If asked to determine

the expected noise from the park at site #8 and #9 from the noise contour map plots, a likely answer would be 64-68dB. That's not what the sound study reports for those locations though. Table 4.10-10 above reports the expected noise from the track to be: at #8 = 60.8dB and at site #9 = 57.2dB

How is that possible? Well, by making sure the measurement locations in the model are at where the arrows point. At those locations the sound is lower than all the surrounding area because there are sound barriers in the terrain just in front of them. Basically, sites #8 and #9 are in a "sound shadow."

71-18



Noise contour map from DEIR. White arrows added highlight site #8 an #9 locations.

To reiterate; because a large section of Purisima Highlands neighborhood will see noise levels in excess of 65dB, the sound study had to "find" areas in the simulation to place their monitor points that were
much quieter than what the neighborhood will actually experience. If this had

not been done, the analysis in table 4.10-10 would show that there will be a noise impact that must require noise mitigation.

In addition to the "cherry picking" for quiet spaces discussed above, it appears that another reason sites #8 and #9 are included is to be able to use the 82.4dB value collected from a plane in flight during noise monitoring. Using this plane flight sound data allows them to "show" how loud the area is already. It is important to note that without the plane data, the ambient measured noise for an hour Leq, is only 62.7dB measured near the edge of North H Street! 71-18

So, what happens if we do our own bit of modeling and use values that are more realistic to those that will be encountered as a function of operating the proposed park?

If I'm gracious to the authors and average the ambient noise measurements in Table 4.10-3 above and use that for background (as opposed to simply using the lowest value to prove my point as they did with picking the highest values), and then use a value of 105dB as the expected noise during a motorcycle race, the chart below is what you end up with for impact. Luckily the math in the models makes it so I'm able to simply add 13dB everywhere to the sound maps to get new values for the table. 71-19

site	ambient	ohv noise	OHV + Ambient	calculated increase
1	61.5	61.8	64.7	3.2
2	61.5	63.6	65.7	4.2
3	61.5	64.4	66.2	4.7
4	61.5	63.2	65.4	3.9
5	61.5	61.2	64.4	2.9
6	61.5	57.2	62.9	1.4
7	61.5	58.2	63.2	1.7
8	61.5	73.2	73.5	12.0
9	61.5	70.4	70.9	9.4
10	61.5	51.1	61.9	0.4
11	61.5	54.8	62.3	0.8
12	61.5	72	72.4	10.9
13	61.5	61.7	64.6	3.1
14	61.5	61.2	64.4	2.9
15	61.5	77.3	77.4	15.9
16	61.5	63	65.3	3.8

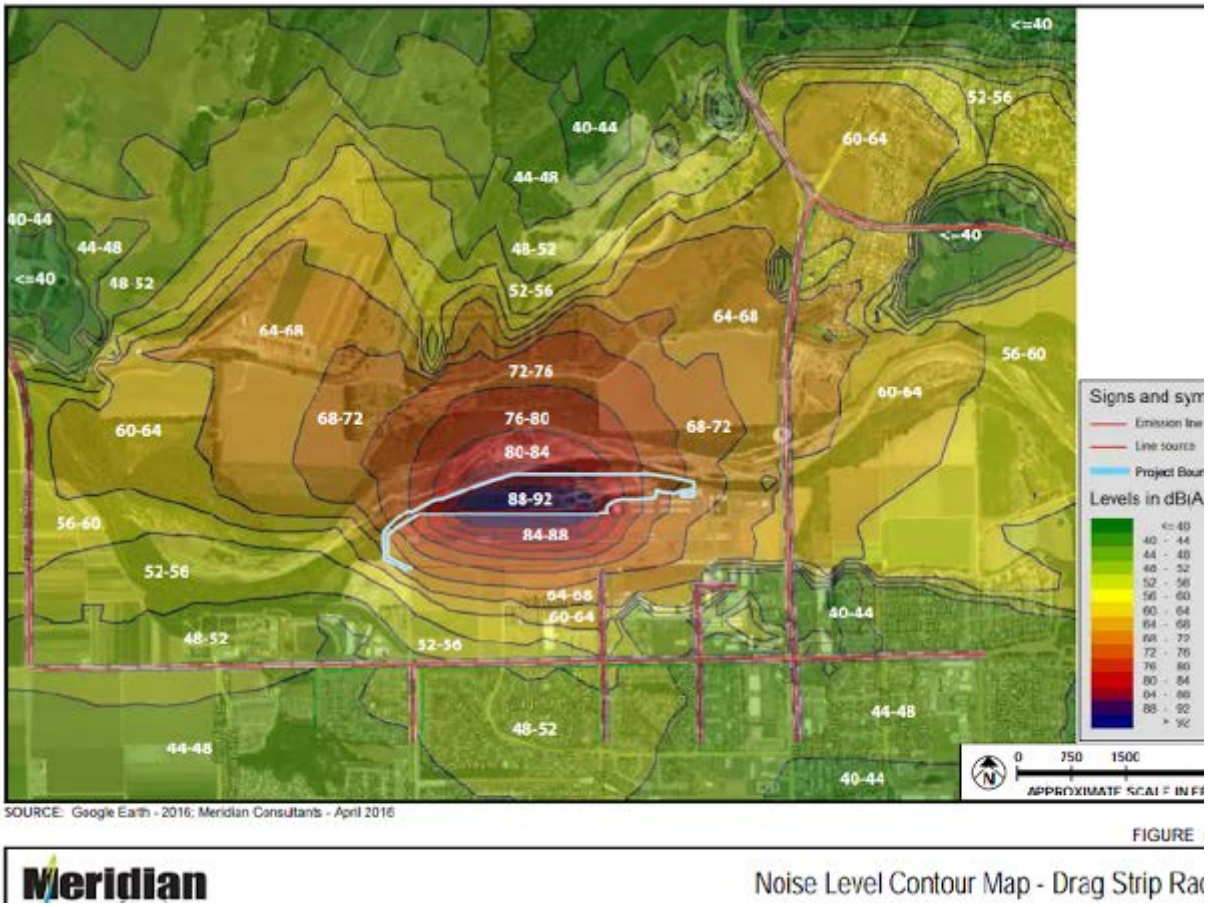
Sound modeling using adjusted values. Red cells show sites where combined noise levels exceed 65dB, yellow cells show sites where the noise increses more than 3dB

As you can see, even in the distorted application of the general plan noise element used in the DEIR, where you only need to be below 65dB at the nearest property line, there are several locations that are well over the limit. 71-19

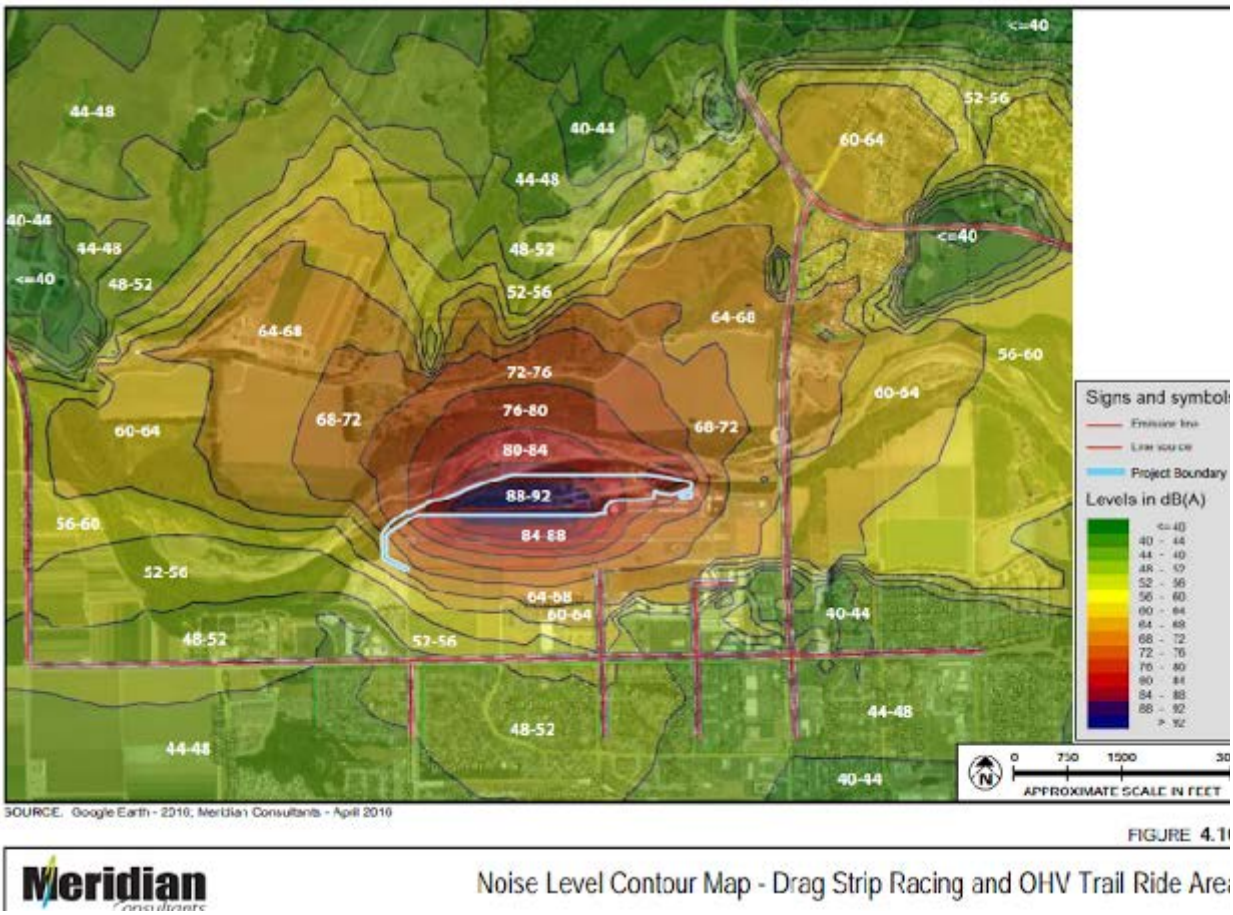
Still with me? If so, we're about to dig a little deeper into their model setup.

Point Source vs. Line Array

There are three sound level model maps provided in the DEIR. One is of the drag strip in operation only, another is the drag strip and OHV area operated simultaneously, and the final is OHV area operating only. 71-20



Line Array source - Drag Strip only



SOURCE: Google Earth - 2010; Meridian Consultants - April 2010

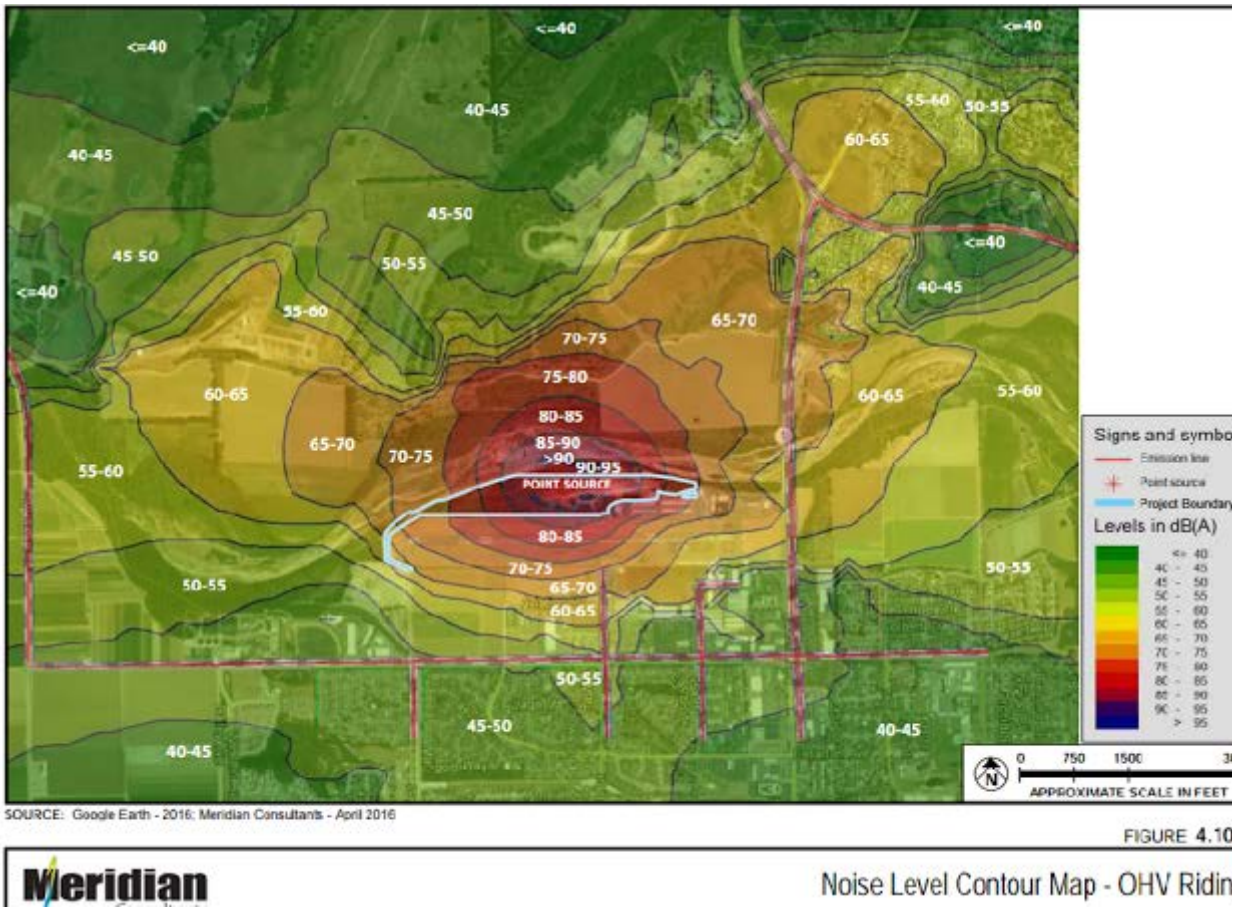
FIGURE 4.1

Meridian consultants

Noise Level Contour Map - Drag Strip Racing and OHV Trail Ride Area

Line Array Source - Drag Strip and OHV noise

71-20



Point Source - OHV only

71-20

Notice that two of the maps have a purple oval shaped noise source and one has a generally more circular noise pattern. The reason for the change in shape in noise source has to do with what "type" of source was modeled. The two drag strip maps use what's called a line array source, this drives the oval shape. The "OHV only" map uses a point source, this drives the more circular shape.

This is an important difference because line array sources have strong directionality to where they send their power. By contrast, point sources are equally loud in all directions. In other words, line arrays are loudest in the direction you point them and point sources are equally loud everywhere.

In this case, it appears that the line array is oriented to the sky, sending most of its' energy up and away from nearby sensitive receptors. I make this observation because as we can see from the OHV only maps, the "reach" of the loudest areas in the map is much larger, and mostly symmetric, for only a 3dB increase in starting noise level. Now, the possibility does it exist that the

orientation of the line array output is pointed into the ground. If someone was clever enough, it should be possible to find a height above the ground where there is significant interference with the output, from reflection off the ground, to result in an overall reduction of sound propagation distance.

71-20

I can almost give this a pass. I mean they are trying to model a drag strip, so they know the noise source won't be in a single location when it's making noise. The reason I can't give a pass however, is that it would have been more accurate to model three to five point sources along the length of the drag strip and generate an average map of the sound levels - but they didn't. They decided to hide noise power in a line array pointed to the sky.

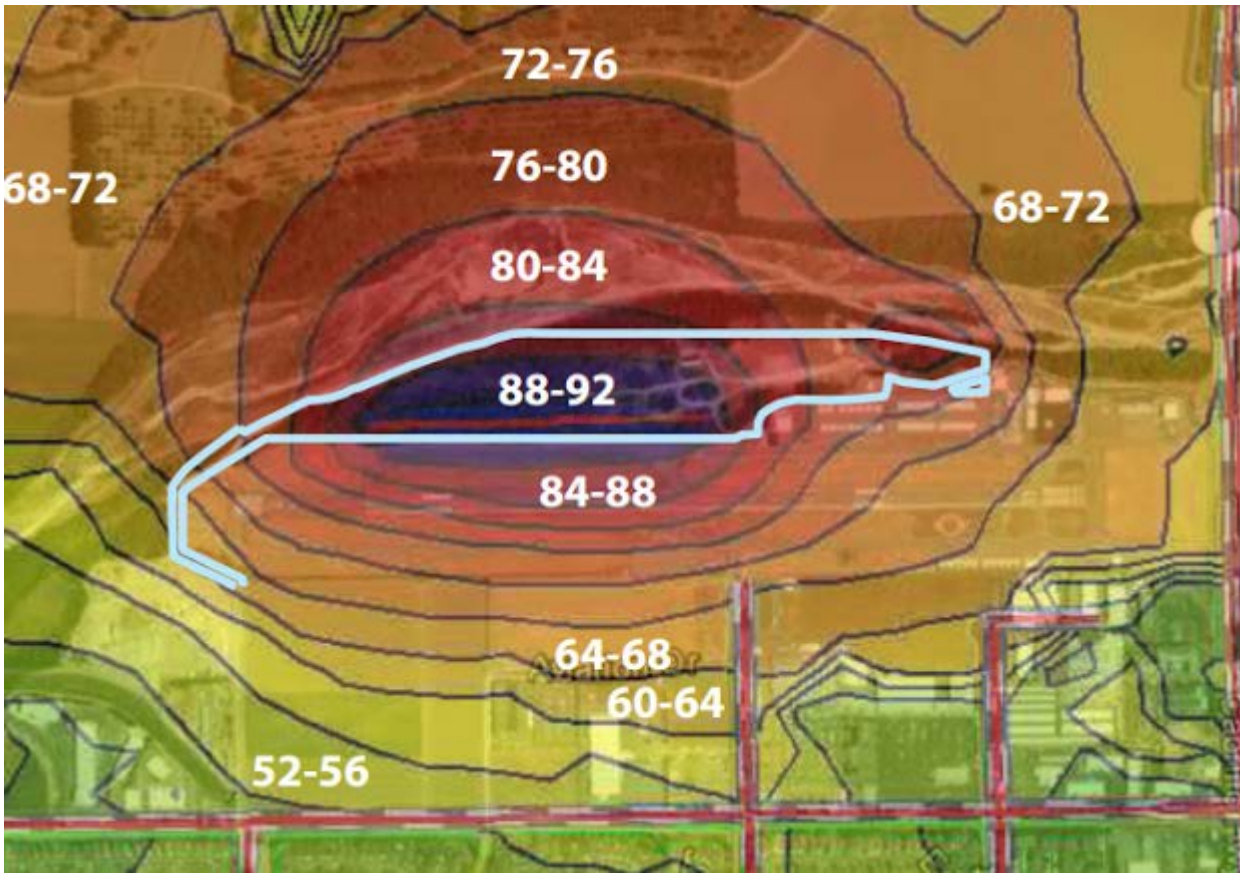
The Motorsports Park Needs YOU!

No, seriously, they do. They need people so bad that it appears that they actually included them in the sound models to absorb acoustic energy in an attempt to keep noise levels out of the surrounding neighborhoods to the South.

Notice that on the drag strip sound model maps, right in the middle of the purple loud areas, there is a bright red stripe that is lower in noise level than everything else around it. That area coincides with the bleacher locations to be installed at the track. Bleachers aren't especially sound absorbing, especially the "open frame" type that are to be used. Now I will grant that there is also an expected 10 foot tall earthen berm that runs approximately the same length of the bleachers, with the track at the bottom of the berm. That berm will undoubtedly help reduce the noise to the South. But you just can't get the type/shape of power drop shown in the model from the berm and bleachers alone, it's simply too discontinuous a shape in the model for that to be the case. No, without bleachers AND people sitting in them as well you can't generate that clearly defined rectangular sound absorbing shape.

71-21

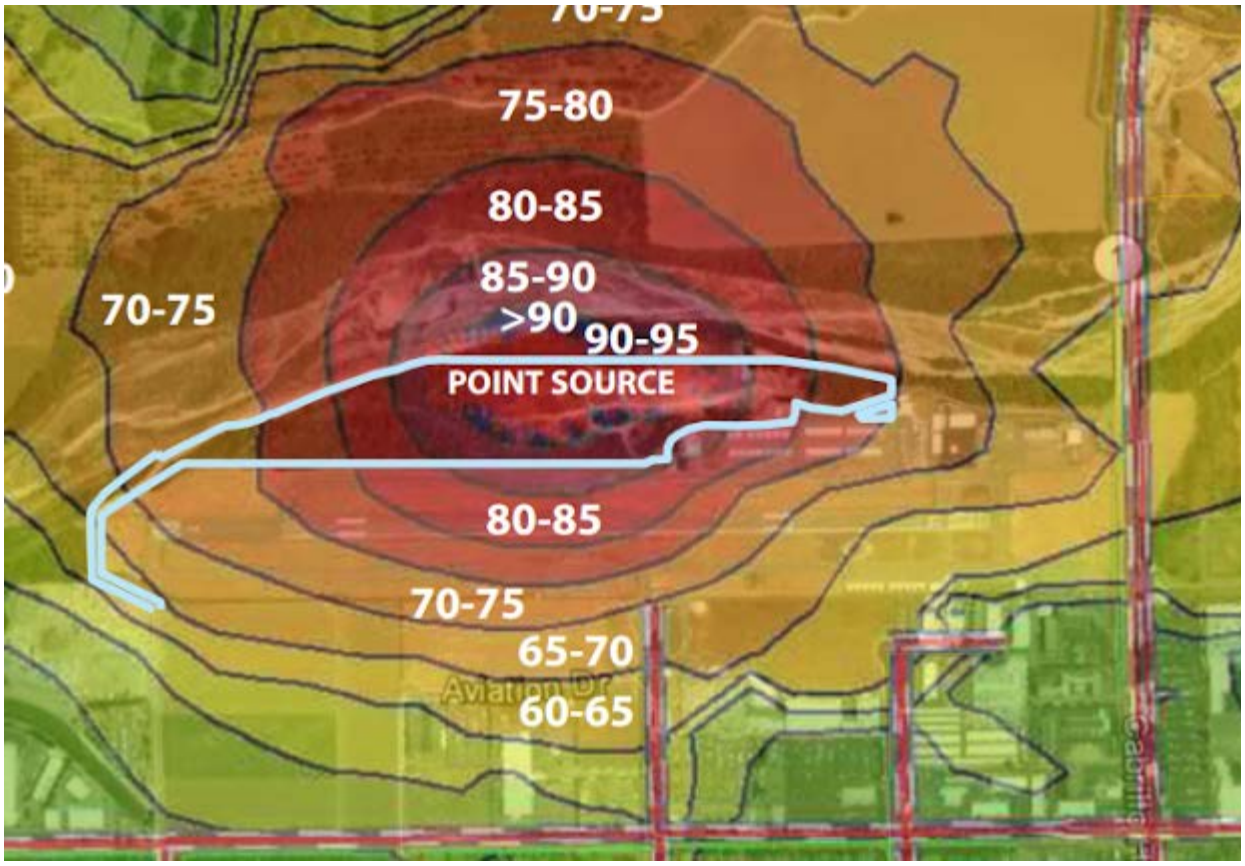
You can tell human bodies work pretty good at absorbing that noise too, since that's predominantly why the sound contour lines on the South side of the map are closer together and fade faster than those to the North and East. I'd wager that the total stated spectator capacity of 1250 people was used in the model as well, so the "stands were full."



Notice the deep red bar in the center of the purple oval, those are stands modeled with people. Also note how much closer together the sound level contour lines are on the South side of the track compared to the North side.

71-21

So now you know why they need you. Without people filling the bleachers, their sound models break even worse.



Notice here that the "red stripe" from the stands and crowd do not appear to be modeled for the OHV only map, as that feature is missing completely, and the noise contours more uniform

71-22

Conclusions:

The noise study appears to have been conducted in a way that was meant to falsely reduce the effect of the operational noise of the motorsports park, thereby making the DEIR claims of "no mitigation necessary" patently false. Evidence of this is found in the false elevation of ambient noise levels, the reduction in total expected noise from the operation, and manipulation of the model sensitive receptor locations and noise source types in an attempt to minimize the possible noise impacts.

This review should serve as a reminder to view with skepticism any claims made by organizers involved the effort to build this proposed project.

71-23

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If you also feel that the claims made in the noise study portion of the DEIR are not accurate after reading this, please voice your concern to Lucille Breese, AICP. Her email address is: 71-23

L_Breese@ci.lompoc.ca.us

Alternatively you can snail mail her at:

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA
93436

NOTE: (~~August 8th, 2016)~~, August 15, 2016, is the updated deadline to provide comments to the City of Lompoc regarding the DEIR.

NOTE: If you came here looking for the Noise Element discussion scroll down, or you can read this along the way too.

The items other than the noise element that are concerns with this proposed park.

Given the potential for increases in air pollution, water pollution, noise pollution and the habitat destruction from the construction and operation of the proposed motorsports park defined in the DEIR, the only way this proposed park could be more of a disaster for our community would be if it incorporated a tire fire as part of it's design. Oh wait: 71-24

Never mind, there will be tire fires, so there's that too. (See table 4.2-9 of the DEIR.) And don't think the motorcycles are getting off easy either - "It should be noted that the OHV events are the primary generator of particulate matter."

Aviation element:

There is a looming policy conflict with the Draft Airport Land Use Plan (ALUP). The Draft ALUP isn't adopted yet, but will be before the proposed park is built. The current ALUP, "sort of" allows the use of the area next to an active runway to be used for recreation, but sort of doesn't, and this use still "might 71-25

need review." Regardless, after the Draft ALUP is adopted we will have a "non-conforming land use," in the proposed park that the city will have to address with Santa Barbara County Association of Governments (SBCAG) and the Federal Aviation Administration (FAA), as group recreation areas are "incompatible uses" for areas next to active runways in the Draft ALUP.

There are also design issues - lights that violate airspace, scoreboards and structures (bridge walkways over the drag strip) that could obscure line of sight of runways, and smoke (see above), all of which has the potential of causing really bad things to happen if you're still trying to use the airport, as well, an airport.

Here's the last few paragraphs from the report supplied by the subcontractors doing the aviation assessment for the DEIR;

An analysis of imaginary surfaces defined in FAR Part 77 indicates that proposed objects within t Project Site could be considered obstructions or, possibly, even hazards to aviation upon FAA revie Additionally, many if not all of the structures must be submitted to the FAA for an obstruction evaluati prior to construction because they would penetrate the FAR Part 77-specified "notice surface", whi represents a threshold level for FAA review. This can sometimes be done as blanket applicatio covering the specific development areas as long as structural heights are known (or covered from conservative "worst case" perspective). Particular attention should be given to locations and heights light standards, timing tower, signage, fencing, grandstands, and V Street pavement grade once th information is available. Proactive measures can sometimes be taken to ensure that these items will n violate FAR Part 77 criteria. 71-25

The Project Site lies within the Sideline Zone defined by the Draft ALUCP expected to be adopted in la 2016. The Santa Barbra County Association of Governments, acting as the Airport Land U Commission for Santa Barbra County, found the proposed stadium seating capacity in particular to b incompatible within the Sideline Zone.

The Project would likely not contribute to a reduction in potential emergency landing surrounding LPC.

The Project represents increased threats to the continued safety of ongoing skydiving operatior Particularly of concern are the reduction in area of the existing DZ, and potential relocation to part of th area directly adjacent to an active runway. Also of concern is the increased potential for distraction pilots, sky divers, and motorsports park participants. With the potential DZ relocation, there is a increased potential for skydivers and cut-aways to drift across the runway depending on wind conditio at the time.

An aircraft accident can occur at any time and at any place within or near the Project Site. An accide could involve an aircraft taking off from or landing at LPC or it could involve an aircraft enroute betwe two other airports, with no connection to LPC. There is no way to completely guard against su occurrences. There are no "standards" that specifically address this probability. Only local decisio makers can determine if this level of probability is acceptable to the Lompoc community.

Excerpt from appendix, Heliplanners Aviation Planning Consultants, report

That last sentence above is what it looks like when a lawyer says - *"You're on your own if you do this."* 71-25

Air pollution:

To summarize: "the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than significant level and the contribution of these emissions to the air quality within SCCAB is considered to be cumulatively considerable for this reason." (pg 4.2-31 of the DEIR) 71-26

Really not much more to be said about that - **operating the park will make air quality demonstrably worse.**

Everyone is a Forester:

Whether you believe it a waste of time and resources or not, the California Department of Fish and Wildlife will require habitat that is lost to the development of this proposed park be restored or replaced - assuming they even grant the permit required to start grading the area.

This means the city will be required to replant/reclaim **72.5 acres of riparian willow thicket**. 71-27

To prevent a repeat of the poor planning and maintenance of the 7 acres previously planted as a result of the runway expansion, this DEIR requires a 75% minimum survival level, at least 4 years from planting, as well as a 90% coverage target 5 years after. No chance of simply planting the thicket, allowing it to die, and saying "well, we tried."

I'm not really sure how to put a price estimate on the land purchase that may be required, or the never ending forestry maintenance fees but, they will be costly.

So;
1) we develop a 38.5 acre motorsports park
2) because we did that, we (the city) now have to plant and maintain a 72.5 acre forest
3) now, keep bleeding money for years maintaining this forest

Economic Growth vs. Water Usage:

According to the DEIR the proposed park will result in **no direct economic growth.** There 'may' be indirect economic impacts. The overall proposed city growth from the proposed park is 0.2%, and "40 volunteer positions." (page 7.1-3)

Conversely the proposed park will use 0.77 acre feet of non-potable water a year for the maintenance of tracks (possibly low estimate) and 7.95 acre feet of potable water for attendees. This is 5% of the total city projected water reserves.

71-28

We get 0.2% growth, it uses 5% of our water. That's a bad deal - especially since none of the water impact estimates account for the riparian woodland mitigation water needs.

Speaking of water; in an effort to "contain" potentially toxic runoff from the proposed park from entering the Santa Ynez River, the site will have grading such that all runoff flows to the center of the project site into "infiltration ponds." There is no description of construction details for these catchment basins as having a lining or sump system for removal of this water. One is left to wonder if the plan is to let this potentially toxic surface water leech back into the groundwater system that the city uses to supply its' residents?

RV park too?

Yep, apparently. The plan for the proposed park is to allow a maximum of 511 private RVs, as vehicles or trailers, to "camp" at the track in the pit areas. The details in the DEIR of how the oversight and management of this aspect will be executed are unclear. Building an RV park on site makes it difficult to see how our local hotels will realize even indirect benefit from the proposed park.

71-29

Now this proposed park is putting temporary housing into the sideline safety zone of an active runway?

Great.

Conclusion:

71-30

I state again that this Draft EIR is inadequate and incomplete, and as such can not be accepted and ratified. 71-30

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~~(August 8th 2016)~~ August 15, 2016, is the updated deadline to write or email Lucile Breese comments about the Draft EIR. Speaking directly to the city council will not be as effective as written communication in having your opinion heard.

Her email address is:

L_Breese@ci.lompoc.ca.us

Alternatively you can snail mail her at:

Lucille Breese, AICP
City of Lompoc
100 Civic Center Plaza
Lompoc, CA
93436

Letter No. 71: Jason Osborne, August 15, 2016

Response 71-1

The comment made by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 71-2

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Please refer to Topical 7 for a full discussion regarding noise methodology. In addition, refer to Response 17-1 for a full discussion on consistency to the applicable policies contained within the City's General Plan Noise Element. It was determined based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact. Based on the findings, the proposed Project would be consistent with Policy 1.1, 1.2, 2.1, 2.3, and 2.4 of the Noise Element.

Response 71-3

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents, as well as species. With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant. The issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 71-4

Please refer to response 17-2 regarding land use issues related to the ALUP.

Additionally, please see response 29-7 regarding safety zones.

As discussed, the relocation of the sky diving drop zone is subject to FAA review and approval, and if approved, it would comply with FAA regulation for Parachute Landing Areas (PLA).

Response 71-5

Please refer to response 13-1 regarding air quality and noise.

As noted in the Draft EIR, all vehicles with need to utilize original manufacturers equipment and no "after-market" changes.

Response 71-6

As stated in mitigation measure 4.3-1, the Project Plan will be developed in consultation with City of Lompoc and submitted to the CDFW for review and concurrence at least 30 days prior to beginning construction. Mitigation may be conducted adjacent to the proposed Project in remaining arroyo willow thickets, and/or at appropriate off-site City-owned properties. Should off-site locations be considered, they should have similar habitat conditions, including, elevation, topography, soil conditions, moisture regimes, vegetation composition, percent cover and proximity to the Santa Ynez River.

Response 71-7

Please refer to response 63-2 regarding the infiltration basins.

Response 71-8

The commenter addresses opposition to the water usage and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 71-9

As noted in the Draft EIR, Section 3.0, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained. Because the proposed Project is subject to a conditional use permit by the City, the City can impose additional restrictions on RV use.

Response 71-10

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 71-11

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-12

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-13

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-14

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-15

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-16

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-17

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-18

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-19

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-20

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-21

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-22

Section 4.10 of the Draft EIR evaluates noise impacts from the motorsports park events. Please see the response to comment 13-1.

Response 71-23

The comment made by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 71-24

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents, as well as species. With the exception of certain air quality impacts associated with vehicle trips to and from the site, all impacts are either less than significant or can be mitigated to less than significant.

Please refer to response 35-5 regarding fire services.

Response 71-25

Please refer to response 17-2 regarding land use issues related to the ALUP.

Please refer to response 16-3 regarding safety concerns at the airport.

Response 71-26

Please refer to response 17-3 regarding air quality.

Response 71-27

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 71-28

Please refer to response 63-2 regarding the infiltration basins.

According to the CEQA Guidelines Section 15131 Economic and Social Effects state that economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes. Real estate prices are an economic factor and, therefore, are not analyzed in the Draft EIR.

Response 71-29

As noted in the Draft EIR, Section 3.0, overnight self-contained RV parking would be available for weekend events. The number of spaces available to RVs would be limited, as would access to the site. No provision for RV hookups (water, sewer, electric) are proposed, so all RVS would be required to be self-contained.

Response 71-30

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

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AUG 15 2016

Planning Division

Draft EIR for Motorsports Business
Lucille Breeze, AICP
100 Civic Center Plaza
Lompoc CA 93436

The Draft EIR has been reviewed. There are many areas that are inaccurate and incomplete. It needs further review and should include many revisions. We have many questions which are not answered in this document. 72-1

Among them are:

1. Alternate sites. During the Scoping discussions, we suggested in writing and sent to you that the Motorsports business be located out of the urban area but in the city limits on a site at the rear of the Federal Prison property. This was not considered but is as feasible as the suggested sites that were considered. 72-2
2. It is obvious, after reading the Draft EIR, that the proponent's Foundation will not have funds to carry out all of the required planning documents, studies and construction. The Draft EIR does not cover the environmental changes left uncompleted due to these lack of funds. "Who will pay to clean up the mess left uncompleted?" 72-3
3. The proposed changes to the proposed site at the Lompoc airport will preclude any future improvements or expansion to the existing airport. 72-4
4. The Motorsports project is a private business being promoted by the Foundation. It is not a City Recreation project. It is not a "Park."
   It is therefore, not an approved project for the proposed city property. This is not Considered in the Draft EIR. 72-5
5. The Motorsports project will adversely affect the City economy by forcing the Skydiving business which brings tourists and money to Lompoc, presently at the airport, to leave the City and relocate in Santa Maria. This is not considered in the Draft EIR. 72-6
6. The Draft EIR does not consider the negative financial impact the Motorsport business will have on the property values of homes a few hundred feet away from the proposed site. 72-7
7. The "Reasons for the Motorsports project "that are the basis of the EIR and addressed throughout are the invention of the proponents as a "need" in the community and not a valid requirement in the City's General Plan. In particular, there is no known complaint against street racing in Lompoc that would be used to justify the need for a Motorsports Project. . 72-8
8. The Mitigations stated in the Draft EIR require that the proponents provide official plans to accomplish them. There is no metric in the Draft EIR that would assure that this is ever done other than saying that it needs to be done. Who will see to it and fund it? 72-9
9. In discussing the Alternate Sites, the City does not need to purchase them as suggested in the Draft EIR. That is the problem of the Proponents. 72-10

10. The Draft EIR gives the reader the impression that it is very "PRO project." The Draft EIR reads like a Proponent Proposal rather than a critical review. What is needed is a "professional Peer" review of this DRAFT document to clear up any perceptions of "bias." 72-11
11. The noise study says there is no noise issue to mitigate. This is inaccurate as their own data shows the project fails to satisfy the 2030 Noise Policy in the following:
    a. Page N-9 of the General Plan noise element, policy 1.1 states "the city shall require each land use to maintain noise at their property line in compliance with City standards". 72-12
    b. Policy 2.3 states "The City shall minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan".
12. The City will need to address all the issues raised by the SBCAG and the Federal Aviation Administration regarding incompatible uses for areas next to active runways, especially in the compliance of land and air safety zones. 72-13

This Draft EIR has many flaws and definitely needs to be redone before it is certified. There are too many unanswered questions which have not been answered sufficiently. The various mitigations are also inadequate and we totally oppose certification of this document until those mitigations and questions are satisfactorily answered. 72-14

Justin & Ann Ruhge
525 Brookside Dr.
Lompoc, California

Letter No. 72: Justin and Ann Ruhge, August 15, 2016

Response 72-1

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 72-2

Please refer to response 13-3.

Sites that are available as alternatives were discussed and ultimately determined infeasible.

Response 72-3

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 72-4

The issue raised by the commenter does not address any issues with the environmental analysis provided in the Draft EIR, therefore, no further response is necessary.

Response 72-5

Please refer to response 29-1.

Response 72-6

Please refer to response 14-1 regarding relocating the skydive landing area.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 72-7

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 72-8

As stated in the CEQA Guidelines Section 15124: The description of the proposed Project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.

(b) A statement of the objectives sought by the proposed project. A clearly written statement of 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 issue raised by the commenter addresses the merits of the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Response 72-9

A mitigation monitoring and reporting program will be developed and published in conjunction with the Final EIR.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

Response 72-10

Please refer to response 72-2.

Response 72-11

The Draft EIR provides information to decision makers of the impacts of a project on the environment. Lead agencies have the ultimate authority to approve or deny projects as well as the ability to override significant and unavoidable impacts based on the beneficial purpose of the project.

Response 72-12

Please refer to Response 17-1 and Topical 7 for a full discussion on consistency to the applicable policies contained within the City's General Plan Noise Element. It was determined based on the increases being less than 3 dB(A), that noise during the operational phase would result in a less than significant impact. Based on the findings, the proposed Project would be consistent with Policy 1.1, 1.2, 2.1, 2.3, and 2.4 of the Noise Element.

Response 72-13

Please refer to response 17-2 regarding land use compatibility.

Response 72-14

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

Breese, Lucille

From: Diane Zaccagnino [drz1@live.com]
Sent: Saturday, August 13, 2016 8:58 PM
To: Breese, Lucille
Subject: Motor Sports Park

I am Emailing concerning the new Motor Sports Park
I feel that it is a bad idea. A motorsport park will bring a bad element into our quaint little city, not to mention the loud
noise, dust and pollution. We have good air quality in Lompoc and having family members who suffer from asthma, this
a concern of mine. 73-1

I do however think Skydive Santa Barbara is an asset to our community. I am not a skydiver myself, but
I have friends who are. I hate to see Lompoc lose out the revenue and the loss of another locally owned business. 73-2

Thank you,
Diane Zaccagnino

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AUG 15 2016

Planning Division

1

Letter No. 73: Diane Zaccagnino, August 15, 2016

Response 73-1

The commenter addresses opposition to the proposed Project and does not raise any issues with the environmental analysis provided in the Draft EIR. No further response is necessary.

The Draft EIR evaluated potential impacts related to aesthetics (see Section 4.1), air quality (see Section 4.2), land use, (see Section 4.9), noise (see Section 4.10), traffic (see Section 4.13) and others that may affect the nearby residents and their quality of life.

Response 73-2

Please refer to response 14-1 regarding relocating the skydive landing area.

Section 15131, Economic and Social Effects, of the State CEQA Guidelines states economic or social information may be included in an EIR or may be presented in whatever form the agency desires. Economic or social effects of a project shall not be treated as significant effects on the environment.

The City has decided not to include an economic analysis of the proposed Project in the EIR as there is no relation to potential physical changes to the environment resulting from any economic causes.

3.0 REVISIONS TO THE DRAFT EIR

In accordance with the *CEQA Guidelines* Section 15132 (a), this section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct or supplement the environmental impact analysis for the proposed Project. Such changes are a result of recognition of inadvertent errors or omissions as well as individuals, public and agency comments received in response to the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed project.

The Draft EIR Section, **3.0 Project Description**, **Section 4.2, Air Quality, Section 4.3, Biological Resources**, **Section 4.5, Geology and Soils**, **Section 4.6, Greenhouse Gas Emissions**, **Section 4.9, Land Use and Planning**, **Section 4.10, Noise**, **Section 4.12, Recreation**, **Section 4.13, Traffic/Transportation**, **Section 4.14, Utilities and Service System,** and **Section 5.0, Alternatives** include changes based on comments received and have been included in the Final EIR (Sections are provided below). Additions are <u>underlined</u> and deletions are shown in strikethrough (~~strikethrough~~) format.

STATEMENT OF PROJECT OBJECTIVES

The State CEQA Guidelines require an EIR to include a statement of the objectives of the proposed Project that addresses the underlying purpose. The objectives of the proposed Project are as follows:

- Provide compatible recreation opportunities adjacent to the Lompoc Airport, including a variety of motorsports activities for both professional and amateur motorsport users.
- Reduce illegal riding in Santa Ynez River bed and street racing.
- Provide for ongoing recreational uses for skydiving and improve existing skydiving landing areas.
- Minimize environmental impacts on natural resources, the airport, and neighboring residents.
- Redevelop underutilized lands that are in need of remediation and restoration along the Santa Ynez River.
- Provide for the opportunity to implement~~ation of~~ mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project, including the restoration of approximately 7.1 acres of riparian vegetation.
- Provide increased economic activity to Lompoc-based businesses from events at the completed Project through the use of the surrounding public and private recreation areas and businesses by patrons and attendees.
- Preserve and/or minimize impacts to existing airport tenants, operations, and users.
- Improve Run~~a~~way Safety Zones.

DESCRIPTION OF PROJECT CHARACTERISTICS

The proposed Project would include the phased development of the Project site as two park areas, as illustrated in **Figure 3.0-3, Conceptual Site Plan**. The first park area would include the OHV area, which would relocate the existing Kids Moto Fun Park from River Park and include a one-eighth-mile oval dirt track, as well as a 7-acre multitrack OHV area. In addition, the OHV area would include a 2.3-acre, low-speed trail-riding area open to motorcycles, mountain bikes, and all-terrain vehicles (ATV), each at different times. The second park area would include an International Hot Rod Association (IHRA)–sanctioned one-eighth-mile drag strip with grandstands and pit areas. The skydiving landing area would be relocated to the west of the proposed entrance from George Miller Drive.

Site Layout and Project Features

OHV Areas

The proposed Project would construct tracks and riding areas for a variety of OHV activities, as shown in **Figure 3.0-4, Conceptual OHV Recreation Parking Area and Tracks**. A beginner riding area would be

Skydiving Facilities

The Skydive Santa Barbara landing area, currently approximately 250 feet wide and 500 feet long (see **Figure 3.0-2**), would be modified to be an irregularly shaped area 275 by 500 feet wide and would continue to be limited to experienced jumpers. This area would be relocated to the eastern portion of the Project area, adjacent to and west of the proposed trail ride area, as illustrated in **Figure 3.0-3**. Breakaway fencing would be installed on the south and east perimeter of the skydiving landing area to reduce hazards for off-target skydivers. The motorsports access road from George Miller Drive would be temporarily~~y~~ closed to all traffic during skydive jumps, except for emergency vehicles. The existing 100-by-200-foot pea gravel landing target would also be relocated and would serve as an accuracy point for skydivers. A new skydive landing area approximately 250 by 600 feet with a trapezoidal northwest corner, as illustrated in **Figure 3.0-3**, would be located at the west end of the runway to meet requirements for sanctioned, United Parachute Association Class B and C license holders.

Site Infrastructure, Buildings, and Utilities

Infrastructure to be installed would include electrical lines, fire hydrants, nonpotable and potable water lines, and perimeter and divider fencing.

Infrastructure improvements would include water and electrical utility improvements, as shown in **Figure 3.0-10, Conceptual Utilities Plan**. There would be no sewer, gas, or phone service on site. Restrooms for all activities would be provided via portable toilets, the number of which would be determined based on each event size. Currently, two 10-inch storm drains extend from the airport to the edge embankment. These existing stormwater lines would be extended approximately 50 feet north under the new access road as shown on **Figure 3.0-7**. The site would be fenced with 6- or 8-foot-high fencing around the perimeter, as shown in **Figure 3.0-7**.

Water Service

The proposed Project would install 4-inch nonpotable water supply lines. The 4-inch lines would extend east to west across the northern and southern portions of the OHV area and along the endurocross and arenacross areas, as shown in **Figure 3.0-10**. Additional 4-inch lines would extend north to south adjacent to the beginner's track and oval track, and along the east and west portions of the mud bog and sand drag lanes. A 2-inch potable line would travel east to west along the southern portion of the OHV area, with another 2-inch potable line extending north to the oval track. In addition, a water well may be drilled within the Project site, at the sole discretion of the City, on property adjoining George Miller Drive and outside of the OHV area for nonpotable water needs.

A new 10-inch fire hydrant water main with a shutoff valve would be tapped into the existing line located within George Miller Drive. New fire hydrants with shutoff valves would be located at the western end of the drag strip and in the OHV pit area, as shown in **Figure 3.0-10**.

Table 4.2-1
Ambient Air Quality Standards

Air Pollutant	Concentration/Averaging Time State Standard (CAAQS)	Federal Primary Standard (NAAQS)	Most Relevant Health Effects
Ozone	0.09 ppm, 1-hour 0.070 ppm, 8-hour	0.070~~5~~ ppm, 8-hour	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage
Nitrogen dioxide	0.18 ppm, 1-hour 0.030 ppm, annual	100 ppb, 1-hour 0.053 ppm, annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration
Carbon monoxide	20 ppm, 1-hour 9.0 ppm, 8-hour	35 ppm, 1-hour 9 ppm, 8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses
Sulfur dioxide	0.25 ppm, 1-hour 0.04 ppm, 24-hour	75 ppb, 1-hour 0.14 ppm, 24-hour	Bronchoconstriction accompanied by symptoms, which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma
Respirable particulate matter	50 µg/m^3, 24-hour 20 µg/m^3, annual	150 µg/m^3, 24-hour	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature birth
Fine particulate matter	12 µg/m^3, annual	35 µg/m^3, 24hour 12 µg/m^3, annual	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature birth
Lead	1.5 µg/m^3, 30-day	0.15 µg/m^3, 3-month rolling	(a) Learning disabilities; and (b) Impairment of blood formation and nerve conduction

Land Uses

- 38 acres of City Park to simulate emissions for the proposed Project
- 10,000 square foot floor area

Construction

- Construction period of approximately 2 years beginning January 2017 and ending by December 2018.
- Construction would occur over five phases: (1) Site Preparation which would last approximately 30 days, (2) Grading for approximately 55 days, (3) Building Construction for approximately 39 days, (4) Paving for approximately 45 days, and (5) Drag Strip paving for approximately 340 days.
- Construction would occur 5 days per week with 8-hour work days

Each phase of construction would result in varying levels of intensity and the number of construction personnel. The construction workforce would consist of approximately 5 worker trips per day during site preparation, 10 worker trips per day during grading, 35 worker trips per day during building construction, 8 worker trips per day during paving, and 15 worker trips day during drag strip paving.

Operation

Operation emissions generated by both area and mobile sources would result from normal day-to-day activities of the proposed Project site. Offsite mobile emissions would be generated by the motor vehicles traveling to the City to attend activities at the proposed Project site. Onsite mobile emissions are discussed~~ion~~ in **Dispersion Modeling** and include the emissions from OHVs and vehicles participating in drag strip events. The parking area surfaces would be constructed of wood chips except accessible parking, which would be decomposed granite. The OHV tracks would be unpaved and would represent a source of dust, or particulate matter emissions, which can be characterized as area sources.

Project-generated, regional, and mobile-source emissions of criteria air pollutants and ozone precursors were also modeled using the CalEEMod computer program. CalEEMod allows land use selections that include project location specifics and trip generation rates.

The analysis of daily operational emissions associated with the proposed Project have been prepared using the data and methodologies identified in the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* and current motor vehicle emission factors in CalEEMod. Trip rates for these land uses were obtained from the traffic impact study for the proposed Project (**Appendix 4.13**). To estimate the emissions by patrons traveling to and from the City to attend motorsports events, information from **Section 3.0** was utilized to determine the number of local trips (during a weekday event) and regional trips (during a weekend event) to the proposed Project site. Trips were determined to be an average of 2.5 persons per spectator vehicle and 3 persons per participant and pit crew vehicle.

emission levels in the air basin. The 2013 CAP utilized SBCAG's Regional Growth Forecast 2010-2040, to project population growth and associated air pollutant emissions for all of Santa Barbara County.

The proposed Project involves the development of approximately 38 acres of motorsports park uses on a site designated for community facility uses in the City's 2030 General Plan and public facilities zone. The proposed Project would include the phased development of the proposed Project site as two park areas, as illustrated in **Figure 3.0-3, Conceptual Site Plan**. The first park area would include the OHV area, which would relocate the existing Kids Moto Fun Park from River Park and include a one-eighth-mile oval dirt track, as well as a 7-acre multitrack OHV area. In addition, the OHV area would include a 2.3-acre, low-speed trail-riding area open to motorcycles and mountain bikes at a different time, all-terrain vehicles (ATV), for these vehicle types at different times. The second park area would include an International Hot Rod Association (IHRA)–sanctioned one-eighth-mile drag strip with grandstands and pit areas. The skydiving landing area would be relocated to the west of the proposed entrance from George Miller Drive.

Temporary emissions associated with construction of the proposed Project would not exceed any of the criteria pollutant SBCAPCD thresholds for regional emissions, as indicated in **Table 4.2-8** ~~and **Table 4.2-9**~~. Therefore, the proposed Project's construction ~~and operation~~ related emissions would be consistent with the CAP.

The 2013 CAP indicates the number of employees in commercial and industrial businesses totaled 135,100 in 2008, would grow to 150,800 employees in 2020, and to 160,200 employees in 2030.[17] SBCAG indicates the number of employees in the City totaled 10,686 in 2010, would grow to 11,643 employees in 2020, to 12,756 employees in 2035, and to 12,777 employees in 2040.[18] The proposed Project would employ up to 40 employees by 2020, which would account for less than 1 percent of the projected growth in the region and would fall within the projected growth in the City between 2008 and 2020. Furthermore, the proposed Project would permit similar recreational uses as those currently permitted by existing zoning for the proposed Project site. The proposed Project would also be consistent with the City's General Plan Conservation Element goals and policies to minimize air quality impacts resulting from construction and development activities regulated by the City using current recommendations from SBCAPCD conditions and implementing the City's grading ordinance; the proposed Project would minimize vehicle-related air quality impacts; and would remain consistent with draft framework thresholds for per service population

17 SBCAPCD, *Final 2013 Clean Air Plan* (March 2015), Table 3-2.

18 Santa Barbara County Association of Governments, *Regional Growth Forecast 2010-2040*, adopted December 2012, Table 7.

emissions. Accordingly, the proposed Project would be consistent with the employment projections within the 2013 CAP and the 2012 Regional Growth Forecast and impacts would be less than significant.

Threshold 4.2-2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Emissions

The estimated maximum daily construction emissions for the proposed Project are listed in **Table 4.2-8, Construction Emissions (tons/year).** Those estimates are based on the expected location, size, and development of the proposed Project. The analysis assumes all of the construction equipment and activities would occur continuously over the day and that activities would overlap. In reality, that would not occur, as most equipment operates only a fraction of each workday and many of the activities would not overlap on daily basis. Project Design Features require~~s~~ compliance with the applicable SBCAPCD rules during construction of each individual project.

Table 4.2-8
Construction Emissions (tons/year)

	Pollutant (tons/year)					
Source	**VOC**	**NOx**	**CO[a]**	**SOx**	**PM10**	**PM2.5**
Maximum	0.13	1.84	2.24	0.00	0.23	0.16
SBCAPCD Threshold	25	25	-	-	25	25
Exceeds Threshold?	No	No	-	No	No	No

*Air Emissions Model Results are presented in **Appendix 4.2.***
Note:
[a] The SBCAPCD does not have a threshold for CO.
Please note that the SBCAPCD does not have construction thresholds; however, it does use 25 tons per year for VOC, NOx, or PM10 as a guideline to determine the significance of construction emissions.
Abbreviations: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compounds; SOx = sulfur oxides.

The emissions presented in **Table 4.2-8** include PDFs, as required by applicable SBCAPCD rules, to reduce emissions during construction activities. Construction activities would require use of watering to minimize fugitive dust, reduced vehicle speeds to 15 miles per hour, cover soil stockpiled for more than two days, minimize dust generation after construction activities, and monitor dust control to prevent dust off site. Furthermore, all portable diesel-powered construction equipment would be required to be registered with the State's portable equipment registration program or would require a SBCAPCD permit prior to arrive on the proposed Project site. The California Air Resources Board requires diesel construction equipment to meet CARB Tier 2 or higher emission standards to the maximum extent feasible, limit idling

As discussed in **Section 3.0**, operation of the proposed Project would provide for a variety of drag strip, OHV, and non-racing events. Events would take place on weekdays and weekends, as listed below in **Table 3.0-1, OHV Area Events Table** and **Table 3.0-2, Drag Strip Events**. The maximum number of vehicles and persons onsite during a weekday event (Wednesday) would be 234 and 627, respectively. The maximum number of vehicles and persons onsite for weekend events are determined by the total number of pit parking stalls and the total number of regular vehicle parking spaces. Several event scenarios were determined to occur over a two-day weekend event. Scenario 1 involves the OHV – Saturday nonevent Open Riding/No Racing and Drag Strip – Specialty Drag Race event which would include approximately 1,160 vehicles and approximately 2,700 persons. Scenario 2 involves the OHV – Endurocross Quarterly regional event and Oval Track regional cart events would include approximately 930 vehicles and approximately 2,580 persons. Particulate matter is the pollutant of concern with the operation of the OHV events. Both scenarios incorporated project design features, which requires a water amendment with an efficiency of 50 percent (frequent water for five minutes every hour) to the surface of the open riding trail area.

To determine the worst case analysis, the initial dispersion model included the following inputs: the access road, parking lots, pit areas, races on the oval cart track, motocross track, stadiumcross track, and endurocross track. Scenario 2 included the access road, parking lots, pit areas, drag strip and open riding area. The modeling results indicate that Scenario 1 would result in approximately ~~315.96~~346.03 ug/m^3 of particulate matter and Scenario 2 would result in approximately ~~148.43~~154.09 ug/m^3 of particulate matter. The particulate matter threshold for a 24-hour exposure is 8 ug/m^3 of particulate matter. It should be noted that the OHV events are the primary generator of particulate matter. Therefore, particulate matter impacts would be potentially significant for both scenarios.

Toxic Air Contaminants

A potentially significant public health standard would occur if the Hazard Index is more than 1.0 for non-cancer risk. For non-carcinogenic effects, the hazard index totaled less than one (8.5E-02 and 6.4E-02) for both the toxic 1 hour and 8-hour exposure scenarios. Therefore, non-carcinogenic hazards would be below the Hazard Index of more than 1.0 for non-cancer risk. Non-carcinogenic impacts would be less than significant.

SCCAB region is in nonattainment for PM10 and ozone. Therefore, if the proposed Project exceeds the regional thresholds for PM10, then it contributes to a cumulatively considerable impact for those pollutants. Additionally, if the Project exceeds the regional threshold for NOx or VOC, then, it follows, the proposed Project would contribute to a cumulatively considerable impact for ozone.

As indicated in **Table 4.2-9~~8~~** above, the highest daily emissions estimated for the proposed Project would exceed SBAPCD daily mobile significance thresholds. Since the proposed Project would generate daily emissions that would exceed those daily mobile significance thresholds, the proposed Project would contribute to significant cumulative impacts.

MITIGATION MEASURES

The following mitigation measures have been identified to reduce potential air quality impacts generated by the proposed Project:

MM 4.2-1 A Fugitive Dust Control Plan shall be prepared and submitted to the City of Lompoc and ~~Santa Barbara County Air Pollution Control District (SBAPCD)~~ for review and approval and Santa Barbara County Air Pollution Control District (SBAPCD) for input, before operation of the proposed motorsports park facility. The Fugitive Dust Control Plan shall be implemented and shall include measures to control emissions of airborne particulate matter associated with onsite off-highway vehicle (OHV) and drag strip activities sufficient to ensure particulate matter is below the 8 ug/m^3 threshold and limited to the project site. Measures to be included in the Fugitive Dust Control plan to control operational emissions shall include, but are not limited to, the following:

- Onsite access roads extending from George Millar Drive and V Street shall be paved.
- The Open Riding and Trail area shall be limited to 14 OHVs per hour.
- All ground surfaces with OHV activities shall be watered by an amended water agent to achieve a minimum control efficiency of 84 percent.

MM 4.2-2 The motorsports operator shall limit the number of OHV vehicles, OHV races, and length of OHV events based on the anticipated weekend events for concurrent operation of the Oval Cart Track and Stadium Cross events in accordance with the following requirements:

- Restrict the operation of the oval cart track events to 2 races per hour for ~~6~~7 hours each weekend day.
- Restrict the operation of stadium cross events to 2 races per hour for ~~6~~7 hours each weekend day.

4.3-2 would require limitations as to the operation of the OHV component of the proposed Project. The emission results with mitigation measures **MM 4.2-1** through **MM 4.2-4** are shown in **Table 4.2-10~~9~~, Modeled Mitigated Emission Results**. Impacts on local air quality around the site would be mitigated to a less than significant level with implementation of mitigation measure **MM 4.2-1** through **MM 4.2-4.**

Table 4.2-10
Modeled Mitigated Emission Results

	Threshold NO2 (1-hour) 10 ug/m^3	PM10 (24-Hour) 8 ug/m^3	CO (1-hour) 800 ug/m^3	CO (8-hour) 200 ug/m^3
Scenario 1: OHV courses	3.94	~~7.11~~7.90	282.90	43.56
Scenario 2: Drag Strip and Open Riding	3.94	~~7.85~~6.50	282.90	43.56
Exceed Threshold	**No**	**No**	**No**	**No**

In the event the restriction to the number of OHV vehicles, number of OHV races per hour, and the length of OHV events are determined to be infeasible with implementation of **Mitigation Measures MM 4.2-2** through **MM 4.2-4**; then localized emission impacts would be considered adverse, significant, and unavoidable.

As shown previously in **Table 4.2-~~8~~9**, emissions generated by travel by patrons to the City and Lompoc Valley to attend the motorsports facility would be a primary source of operational emissions that would result in the proposed Project exceeding SBAPCD daily vehicle mobile mass emission thresholds. Therefore, the number of trips or the lengths of the motor vehicle trips on a motorsports weekend event day would need to be reduced in order to provide a reduction in the operational emissions from the proposed Project. While future vehicle emissions are expected to be reduced as a result of new emissions control technology in vehicles, that would not reduce the emissions produced by vehicles traveling to and from the proposed Project site to a less than significant level on a motorsports weekend event day.

The proposed Project includes Project Design Features that reduce the number and length of vehicle trips to the maximum amount feasible by allowing camping onsite. As indicated in **Appendix 4.13**, trips were determined to be an average of 2.5 persons per spectator vehicle and 3 persons per participant and pit crew vehicle. It would not be feasible to further reduce trips by patrons to and from the Lompoc Valley to attend weekend motorsports events due to those trips originating from numerous separate locations at different times by individual patrons. Therefore, the daily operational emissions generated by the proposed Project on a weekend motorsports event day cannot be feasibly mitigated to a less than

Table 4.3-3
Special-Status Plant Species

Scientific Name	Listing[1]	Potential to Occur on Proposed Site[2]	Notes
Red Sand-Verbena (Abronia maritima)	4.2	Low	Suitable habitat is not present. Species occurs within coastal dunes. CNDDB occurrences are not within 5 miles. The species was not observed during Project surveys.
Hoover's Bent Grass (Agrostis hooveri)	1B.2	Low	Suitable habitat is not present. Species prefers sandy soils within closed-cone coniferous forest, chaparral, cismontane woodland and valley and foothill grassland. The species was not observed during Project surveys.
Santa Ynez Groundstar (Ancistrocarphus keilii)	1B.1	Low	Suitable habitat is not present. Species occurs within sandy soils within chaparral and cismontane woodland. There is a CNDDB record within 1 mile of the Project but the occurrence is fro~~or~~m 1928. The species was not observed during Project surveys.
Aphanisma (Aphanisma blitoides)	1B.2	Low	Suitable habitat is not present. Species occurs within sandy or gravelly soils in coastal bluff scrub, coastal dunes and coastal scrub. CNDDB occurrences are not within 5 miles. The species was not observed during Project surveys.
Eastwood's Brittle-Leaf Manzanita (Arctostaphylos crustacea ssp. eastwoodiana)	1B.1	Low	Suitable habitat is not present. Species occurs within maritime sandy chaparral. The species was not observed during Project surveys.
Santa Cruz Island Manzanita (Arctostaphylos crustacea ssp. subcordata)	4.2	Low	Suitable habitat is not present. Species occurs within rocky soils within closed-cone coniferous forest and chaparral. The species was not observed during Project surveys.
La Purisima Manzanita (Arctostaphylos purissima)	1B.1	Low	Suitable habitat is not present. Species occurs within sandy soils within chaparral and coastal scrub. The species was not observed during Project surveys.
Sand Mesa Manzanita (Arctostaphylos rudis)	1B.2	Low	Suitable habitat is not present. Species occurs in sandy soils within maritime chaparral and coastal scrub. The species was not observed during Project surveys.
Ocean Bluff Milk-Vetch (Astragalus nuttallii var. nuttallii)	4.2	Low	Suitable habitat is not present. Species occurs within coastal bluff scrub and coastal dunes. CNDDB occurrences are not within 5 miles. The species was not observed during Project surveys.

Table 4.3-5
Special-Status Wildlife Species

Scientific Name	Listing[1]	Potential to Occur Onsite[2]	Notes
vernal pool fairy shrimp (Branchinecta lynchi)	FT	Low	The Project site does not include vernal pool habitat. No records within the vicinity of the project. The species was not observed during Project surveys.
El Segundo blue butterfly (Euphilotes battoides allyni)	FE	Low	No suitable habitat present. Species requires coastal dune habitat and hostplant *Eriogonum parvifolium*. The species was not observed during Project surveys.
tidewater goby (Eucyclogobius newberryi)	FE, SSC	Low	No habitat present. Project site does not include aquatic habitat. The species was not observed during Project surveys.
unarmored threespine stickleback (Gasterosteus aculeatus williamsoni)	FE, SE, FP	Low	No habitat present. Project site does not include aquatic habitat. The species was not observed during Project surveys.
arroyo chub (Gila orcuttii)	SSC	Low	No habitat present. Project site does not include aquatic habitat. The species was not observed during Project surveys.
steelhead - southern California DPS *(Oncorhynchus mykiss irideus)*	FE	Low	No habitat present. Project site does not include aquatic habitat. The species was not observed during Project surveys. Critical habitat for steelhead (Oncorhynchus mykiss irideus) is within and contained to the Santa Ynez River adjacent to the site.
California tiger salamander (Ambystoma californiense)	FT, ST, SSC	Low	Project site does not include vernal pool habitat. No records within the vicinity of the project. The species was not observed during Project surveys.
California red-legged frog (Rana draytonii)	FT, SSC	Low	Project site does not include aquatic habitats, but contains suitable aestivation sites. CNDDB occurrence 607 is located one mile downstream of the Project area in the Santa Ynez River. The species was not observed during Project surveys. Due to the disturbed conditions of the river, existing quarry, adjacent to the Project site the species is not~~e~~ expected.
western spadefoot *(Spea hammondii)*	SSC	Low	Project site does not include vernal pool habitat. The species was not observed during Project surveys.
silvery legless lizard (Anniella pulchra pulchra)	SSC	Medium	Suitable habitat present in Project site Species occurs in moist warm loose soil with plant cover. Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. The species was not observed during Project surveys.
western pond turtle *(Emys marmorata)*	SSC	Low	No habitat present. Project area does not include aquatic habitat. The species was not observed during Project surveys.

Loggerhead Shrike (*Lanius ludovicianus)*—Listing: CA Species of Special Concern

Loggerhead shrikes have a medium likelihood of occurrence, as suitable habitat is present within the proposed Project site. Several eBird records are within two miles of the proposed Project. Loggerhead Shrikes inhabit open country with short vegetation and well-spaced shrubs or low trees, particularly those with spines or thorns. They frequent agricultural fields, pastures, old orchards, riparian areas, desert scrublands, savannas, prairies, golf courses, and cemeteries. That species could occur throughout the proposed Project site. The species was not observed during proposed Project surveys.

Western Red Bat (*Lasiurus blossevillii)*—Listing: CA Species of Special Concern

The western red bat has a medium likelihood of occurrence, as ~~s~~suitable foraging and roosting habitat is present within the AWT on the proposed Project site. The species was not observed during proposed Project surveys.

Nesting Birds

Nesting birds could potentially nest within the trees and shrubs within the proposed Project site provide suitable nesting, roosting and perching habitat for migratory birds including raptors. However, no nesting birds were observed during the proposed Project surveys.

Wildlife Movement

The Santa Ynez River located directly north of the proposed Project site, provides a wildlife movement corridor for wildlife in the area as well as riparian habitats that provide cover, nesting and foraging for wildlife species and regional movement. Wildlife movement along the river corridor is generally in an~~s~~ east-to-west direction.

Jurisdictional Wetlands and Water of the US and State

No areas meeting the three mandatory criteria (hydrophytic vegetation, hydrology and hydric soils) for wetland Waters of the United States (U.S.) occur at the proposed Project site. While the AWT at the proposed Project site are dominated by hydrophytic vegetation, arroyo willow and red willow, although there are no indicators of hydrology.

The soils of the proposed Project site are riverwash and metz loamy sand with 0 to 2 percent slopes; neither is listed as a hydric soil (NRCS 2015). The National Wetland inventory does not classify the proposed Project site as a wetland.9 The Santa Ynez River is classified as Riverine-Intermittent-Temporary Flooded (R4USA), and off-site riparian areas to the west of the proposed Project are

9 United States Fish and Wildlife Service. 2015. National Wetland Inventory, www.fws.gov/wetland/data/Mapper.html. Accessed January 2016.

Special-Status Wildlife Species

Southwestern Willow Flycatcher (*Empidonax trailii extimus*)

Proposed Project construction and implementation would result in the loss of suitable foraging, roosting and potential nesting habitat (14.5 acres of AWT) for southwestern willow flycatcher. As discussed in Existing Conditions, the species was not observed on site and no suitable habitat was discovered based on three of five protocol surveys conducted on and adjacent to the site thus far.19 Impacts would potentially be significant until presence or absence has been confirmed.

Additionally, indirect impacts could occur due to elevated noise levels and vibration associated with construction equipment and proposed Project operations, possibly resulting in the abandonment of nests, eggs, or young. Off-site adjacent AWT and CBS will remain intact along the west north central and east portions of the proposed Project site and provide suitable habitat for that and other wildlife species. Those areas will provide a buffer for noise and reduce glare from lighting in off-site habitat along the river. Proposed Project operation, noise levels, vibration and lighting would be temporary, and limited to proposed Project events. Those indirect impacts would be less than significant.

Following construction, OHV and dragstrip race events decibels would occur and range from 80 to 84 decibels at the proposed Project site and from 76 to 80, within the immediate adjacent habitat on the south and north of the river. Those levels are above the accepted level of 60 to 65 decibels for southwestern willow flycatchers during nesting season. Those decibel levels will be temporary and only during race events. Lighting to illuminate event areas will be used during events, but shall be shielded and focused downward reducing direct light in the direction of open space and the Santa Ynez River. Those impacts would be less than significant.

Suitable off-site habitat is present along the north side of the Santa Ynez River and to the west and east along the river including critical habitat to the east. It is expected individuals of that species, if unable to habituate to Project operational conditions, would be able to relocate to nearby suitable habitat. Therefore, indirect impacts would be less than significant from the proposed Project operation.

Cooper's Hawk (*Accipiter cooperii)*, Yellow-Breasted Chat (*Icteria virens*), Yellow Warbler (*Setophaga petechial)*, and Loggerhead Shrike (*Lanius ludovicianus)*

Proposed Project construction and implementation would result in the loss of suitable foraging, roosting, and potential nesting habitat (14.5 acres of AWT) for the cooper's hawk, yellow-breasted chat,

19 Email correspondence between Meridian Consultants and BioResource Consultants, Inc. (dated 4/27/16, 5/19/16, 5/20/16, 6/2/16, 6/13/16).

- **Seismic-related ground failure, including liquefaction?**
- **Landslides?**

Threshold 4.5-2 **Result in substantial soil erosion or the loss of topsoil?**

Threshold 4.5-3 **Be located on a geologic unit or soil that is unstable, or that would become unstable as result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Threshold 4.5-4 **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

Threshold 4.5-5 **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

Methodology

This section incorporates and summarizes information of potential impacts to geologic and soil hazards that would be associated by the proposed Project. Information was obtained by a review and data analysis of available published reports and geologic maps.

Project Design Features

There are no applicable project design features.

Project Impacts

Threshold 4.5-1 **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

The proposed Project site is located in a region that consists of numerous active faults, including the Santa Ynez River, Canada Honda, and Lions Head Faults. Because the proposed Project site does not traverse an active fault or is not located within an Alquist-Priolo Earthquake Fault Zone, No exposure to the risk of loss, injury, or death associated with a surface rupture of a known earthquake fault would occur. Therefore, there would be no impacts from surface rupture.

present. Because the liquefaction potential at the proposed Project site is high, earthquake-induced lateral spreading would be considered to be a potentially significant seismic hazard. However, the maintenance and storage building with lockers, as well as any additional temporary structures on the proposed Project site, would be required to adhere to the City's Building and Safety Code. Accordingly, potential laterally induced spreading impacts would be reduced to less than significant.

Under certain conditions, strong ground shaking can cause the densification of soils, resulting in local or regional settlement of the ground surface. During strong shaking, soil grains become more tightly packed due to the collapse of voids and pore spaces, resulting in a reduction of the thickness of the soil column. The proposed Project site is comprised of soils with alluvial deposits, making it susceptible to seismically induced settlement. All structures would be required to adhere to the City's Building and Safety Code as it relates to settlement, and impacts would be reduced to less than significant.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in a gradual lowering of the ground level. According to the USGS, groundwater depths were found to be as shallow as 29 feet bgs near the southwestern corner of the Project site. Given this presence of shallow groundwater, the potential for ground collapse and other adverse effects due to subsidence to occur on the proposed Project site and at off-site areas is considered potentially significant. All structures would be required to adhere to the City's Building and Safety Code as it relates to subsidence. Accordingly, potential subsidence impacts would be reduced to less than significant.

The soil at the Project site consists of Metz loamy sand, which is not considered to be an expansive or collapsible soil with a low potential for erosional hazards. As previously discussed, structures would be subject to the City's Building and Safety Code for expansive soils. Accordingly, expansive impacts would be less than significant.

Threshold 4.5-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

The alluvial soils underlying the ~~propsoed~~proposed Project site and surrounding area are considered to have a low expansion potential. Compliance with the City's Building and Safety Code, which incorporates the most current CBC by reference, would ensure that construction of the permanent maintenance and storage building with lockers, lighting, and temporary structures, including grandstands, concessions, and the pedestrian bridge, on the proposed Project site would reduce expansive soil-related risks to property. Therefore, impacts related to expansive soils would be less than significant.

Table 4.6-4
Operational GHG Emissions

GHG Emissions Source	Emissions (MTCO2e/year)
Construction (amortized)	18.1
Operational (regional mobile) sources*	6,007.9
Operational (onsite mobile) sources	1,057.9
Area sources	0.0
Energy	1,111.8
Waste	0.4
Water	2.5
Annual Total	**8,198.6**

*Source: CalEEMod Emissions calculations are provided in **Appendix 4.3,** and **Appendix 4.6, Onsite Mobile Emissions.***
Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
Abbreviations: MTCO2e = metric tons of carbon dioxide emissions.
**N2O emissions account for 0.04 MTCO2e/year.*

As shown in **Table 4.6~~3~~-4,** the operational GHG emissions for the proposed Project with Project Design Features and Mitigation Measures would be 8,198.6 MTCO2e per year. This amount of GHG emissions is less than the 10,000 MTCO2e per year screening threshold for stationary land use projects proposed by the SBCAPCD. (Please note that the proposed Project is not considered a stationary land use by the SBCAPCD and the screening threshold has been used for analysis purposes only). The next threshold used for analysis purposes is to compare the SCAQMD's draft service population target (3.0 MTCO2e per year per service population).

As indicated in **Table 4.~~3~~6-4,** the proposed Project would result in 8,198.6 MTCO2e per year with Project Design Features and Mitigation Measures. The maximum number of service persons during any one event scenario would be 2,700 persons. The proposed Project would result in 3.0 MTCO2e per year per service population, which is equivalent to the SCAQMD's draft target. The proposed Project would be below the 10,000 MTCO2e per year screening threshold and would be equivalent to 3.0 MTCO2e per year per service population efficiency target and impacts would be less than significant.

Threshold 4.6-2 Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

The goal of AB 32 is to reduce statewide GHG emissions to 1990 levels by 2020. In December 2008, CARB adopted the *Climate Change Scoping Plan*, which details strategies to meet that goal. The 2008 Scoping Plan instructs local governments to establish sustainable community strategies to reduce GHG emissions associated with transportation, energy, and water, as required under SB 375. Planning efforts that lead to

accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. However, currently there are no significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. ~~Additionally, there is currently no general accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions.~~ Implementing the Project Design Features and GHG-reducing measures would result in a net decrease in GHG emissions. The proposed Project's design features and GHG reduction measures make the project consistent with the goals of AB 32.

Given the proposed Project's consistency with state GHG emission reduction goals and objectives, the Project's contribution to the cumulative impact of greenhouse gas emissions would not be cumulative considerable and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs (i.e., the 2014 Updated Scoping Plan). Similarly, related projects would also be anticipated to comply with these same emissions reduction goals and objectives. Therefore, cumulative impacts with respect to greenhouse gas emissions would be less than significant.

MITIGATION MEASURES

Mitigation measures 4.2-1 through 4.2-4 as identified in **Section 4.2** shall be implemented.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Development of the proposed Project would be consistent with the SBAPCD stationary threshold (for analysis purposes only) and the draft SCAQMD's draft framework efficiency target for 2035, and would incorporate best management practices which aim to reduce indirect energy consumption. GHG emission impacts would be less than significant.

buildings and structures designed; and regulate the density of populations. The City of Lompoc has been divided into zones that are deemed most suitable to carry out such regulations and effectively abide by provisions of the General Plan.

Section 17.068.020 of the Lompoc Municipal Code establishes the general classes of use for Public Facilities (PF) zone.

Thresholds of Significance

To assist in determining whether a Project would have a significant effect on the environment, the City finds a Project may be deemed to have a land use and planning impact if it would:

Threshold 4.9-1 **Physically divide an established community**

Threshold 4.9-2 **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect**

Threshold 4.9-3 **Conflict with any applicable habitat conservation plan or natural community conservation plan**

Methodology

The determination of the proposed Project's consistency with applicable land use plans and policies is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions at and around the Project site. The proposed Project is considered to be consistent with the provisions of the identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary intent of the land use plan or policy.

Project Impacts

Threshold 4.9-1 **Physically divide an established community**

The proposed Project site is a contiguous site, located on the northern end of the City of Lompoc. As previously discussed in Existing Conditions, the proposed Project site is located on undeveloped land located directly south of the Santa Ynez River and north of the Lompoc Airport. The area to the southwest is occupied by an animal services facility, a household hazardous waste collection/disposal facility, and a gravel mine. SR-1 borders the Project site to the east.

The proposed Project site's location would not physically divide any residential communities. Development of the proposed motorsports recreational uses within the Project site would not conflict

Santa Barbara Airport Land Use Plans

Airport Land Use Plan

As previously stated, the Santa Barbara ALUP identifies land uses that should be avoided surrounding the Lompoc Airport.

The proposed Project includes a number of features that may conflict with the ALUP. Those include:

- Any use which would direct a steady light or flashing light of white, green, red or amber color toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA approved navigational signal light or visual approach slope indicator (VASI).

  The proposed Project would install 10 permanent 55-foot light poles and 5 55-foot light poles along the drag strip for nighttime events (see **Figure 4.9-7**). Each light would be shielded and angled down towards and include aircraft warning lights atop each pole.

  In addition, an LED timing board would be provided on the proposed Project site. Those lighting features on site may impact the Airport's operations due to the close proximity.

- Any use which would generate smoke or which may otherwise affect safe air navigation within this area.

  The proposed Project would provide racing events and OHV and ATV uses on site that would generate dust and smoke from vehicles on the drag strip and dirt track areas.

Because the proposed Project may conflict with those provisions of the ALUP, it may be inconsistent with the ALUP. However, the Santa Barbara County Association of Governments (SBCAG), acting as the Airport Land Use Commission (ALUC), has reviewed the proposed Project, as part of the Notice of Preparation (NOP) process, and provided comments to the City in its letter of December 22, 2015. At that time, the SBCAG noted, because the proposed Project is only seeking a Conditional Use Permit (CUP), and only requires discretionary permit approval, and it does not involve a General Plan amendment or rezone, a determination of consistency by the ALUC would not be required.

The proposed Project site is located mainly within Santa Barbara County's ALUP Zone II Safety Area 3 and partially within Safety Area 2 (see **Figure 4.9-6**).

ALUP's Zone II Safety Area 3, Traffic Pattern Zone, allows essentially all uses; however, they must be subject to ALUC review. Allowed uses include:

- residential
- industrial/manufacturing
- transportation/communications/utilities
- commercial/retail trade

operations. That is especially true if skydiving activities occur outside the days noted on FAA Form 5010 Airport Master Record currently in place for LPC. Those impacts would be potentially significant.

Emergency Landing Areas

The Project site is currently not considered a viable emergency landing area because it is characterized by a dense assortment of trees and shrubs. After development of the proposed Project, portions of the site would not be paved and would include off-road vehicle terrain which is still not suitable for emergency landings. Therefore, the proposed Project would not cause any significant impact to the emergency landing area.

Airport Runway Extension Mitigation Project

Implementation of the proposed Project would utilize area set aside for Runway Expansion Mitigation Project. Approximately 7.1 acres of land on the proposed Project site has been previously designated for the replanting of vegetation and mitigation project from the Lompoc Airport Runway Expansion. That mitigation effort arises pursuant to Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife. That replanting has occurred twice but the flora did not survive; as a result, funds of approximately $76,000 repaid to the City by the contractor responsible for that replanting and the City still has those funds.[22]

Loss of the 7.1 acres on site would preclude the City from again implementing what may still be a required mitigation. If that mitigation is still required, then, that would result in a significant impact.

Threshold 4.9-3 Conflict with any applicable habitat conservation plan or natural community conservation plan

The proposed Project site is not within the purview of any habitat conservation plan or natural community conservation plan, nor would the proposed Project affect any area so designated, directly or indirectly. Consequently, implementation of the proposed Project would not conflict with the provisions of any adopted conservation plan, and no impact would occur.

Cumulative Impacts

Development of the proposed Project, in conjunction with other cumulative development in the area permitted by the City's 2030 General Plan could result in Citywide and regional land use planning impacts. However, the proposed Project is consistent with the Lompoc 2030 General Plan (with the inclusion of

22 Revised Replanting Plan Lompoc Airport Runway Expansion Project, Thomas Olson Biological Consulting, July 2002

- Identify an alternative location for use as a DZ outside of any FAA restrictive use zones (i.e., Approach/Departure or Transitional Zones) for the proposed DZ area on the western end of Runway 7/25 prior to operation of the proposed Project; or
- For any DZ located with a designated FAA restrictive use area, the City shall submit a request to FAA for review and approval of such use and incorporation into the Airport Layout Plan (ALP) ~~prior to~~ prior to operation of the proposed Project.

MM 4.9-5 The City shall update Lompoc Airport's FAA Form 5010 Airport Master Record to reflect Skydive Santa Barbara's current days of operation within 10 days of Project approval.

MM 4.9-6 Prior to operation of the proposed Project, the applicant shall coordinate with Skydive Santa Barbara to:

Restrict the skydive lower bench DZ operation times to occur only when OHV and drag racing events are not in session on weekends

MM 4.9-7 The City shall identify an alternate site to implement the mitigation biological mitigation (7.1 acres) required under part of the Runway Expansion Mitigation Project pursuant to the Stream Alteration Agreement (SAA) No. 5-2001-0252 with the California Department of Fish and Wildlife.

MM 4.9-8 If the Draft ALUP is effective prior to the City's approval of the proposed Project, then, within 60 days after that approval, the City Council will need to overrule the inconsistency between that new ALUCP and the City's General Plan.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of existing regulations, standards, and the identified Mitigation Measures **MM 4.9-1** through **MM 4.9-8**, would reduce impacts associated with land use to a level of less than significant.

Table 4.10-3
Noise Measurements in Project Vicinity

Location	Description	Leq (15-minute)
Site 1	Northwest corner of Central Avenue & H Street	72.3
Site 2	Corner of ~~Central Avenue~~. H Street and George Miller Drive	69.0
Site 3	Alan Hancock College Bike Path, north of Project site	49.5
Site 4	Along N. H Street/Highway 1, west of La Purisma Highlands residential units	62.7[a]
Site 5	Agricultural farm	53.9

*Source: Refer to **Appendix 4.10** for monitoring data sheets*
Note: Noise measurements were conducted between 7:54 AM and 10:12 AM on Wednesday, February 17, 2016.
[a] 1-hour Leq from 9:00 AM–9:59 AM.

Existing Aircraft Noise Levels

Existing noise within the Project area includes air traffic associated with the Lompoc Airport immediately south of the Project site. Noise monitoring included locations along N. H Street/Highway 1, west of the La Purisma Highlands residential neighborhood, to record the maximum noise levels associated with takeoff, flight, and landing of the aircraft. The existing aircraft noise levels are provided in **Table 4.10-4, Existing Aircraft Noise Levels**, and also shown on **Figure 4.10-4.**

As shown, aircraft noise levels ranged from a low of 67.4 dB(A) during takeoff and landing to a high of 82.4 dB(A) during flight, in which the aircraft was passing over the meter and the Purisma residential units.

Table 4.10-4
Existing Aircraft Noise Levels

Location	Description	Leq (1-second)		
		Takeoff[a]	Flight[b]	Landing[c]
Site 4	Along N. H Street/Highway 1, west of La Purisma Highlands residential neighborhood	67.4	82.4	67.4

*Source: Refer to **Appendix 4.10** for monitoring data sheets.*
Note: Noise measurements were conducted between 10:51 AM and 12:28 PM on Wednesday, March 30, 2016.
[a] Takeoff Leq(1-second): 11:14.53
[b] Flight Leq(1-second): 11:18.14
[c] Landing Leq(1-second): 11:31.02

dB for engines with a displacement smaller than 170 cubic centimeters (cc) and 82 dB for engines with a displacement greater than 170 cc. As described, this procedure is specifically addressed to the testing of OHVs as developed and distributed by manufacturers and retailers. As such, the criteria and procedures established in the Federal Noise Control Act of 1972 do not account for increases in OHV noise due to modifications to the vehicle by individual owners, which has become commonplace to increase the performance of OHVs. However, because this Park is funded with State Parks grant funds, OHVs must have a stock exhaust of a CARB approved after marker exhaust that meets California Standards for the year of motorcycle or quad to be ridden in the Park.

Because the test method requires a professional user and adequate space and terrain for implementation, it is not practical as a field enforcement test.[12]

State

State of California Building Code

California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, California Building Code. These noise standards are applied to new construction in California for the purpose of interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dB(A) CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dB(A) CNEL.

California Noise Insulation Standards

The California Noise Insulation Standards[13] require that interior noise levels from exterior sources be 45 dB(A) or less in any habitable room of a residential-use facility (e.g., single family, dormitories, long-term care facilities, and apartment houses) with doors and windows closed. Measurements are based on CNEL or Ldn (the day-night average), whichever is consistent with the noise element of the local general plan. Where exterior noise levels exceed 60 dB(A) CNEL, an acoustical analysis for new development may be required to show that the proposed construction will reduce interior noise levels to 45 dB(A) CNEL. If the interior 45 dB(A) CNEL limit can be achieved only with the windows closed, the residence must include mechanical ventilation that meets applicable Uniform Building Code (UBC) requirements.

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12 Wyle Laboratories, *California Off-Highway Vehicle Noise Study: A Report to the California Legislature as Required by Public Resources Code Section 5090.32(o),* WR-04-31 (El Segundo, CA: Wyle Laboratories, September 2005).

13 California Code of Regulation, tit. 24, sec. 3501 et seq.

Regional and Local

City of Lompoc 2030 General Plan

The City of Lompoc 2030 General Plan Noise Element contains noise guidelines and policies that establish acceptable noise levels for different land uses (Policy 2.1 of the Noise Element), as shown in **Table 4.10-7, Interior and Exterior Noise Standards.**

Table 4.10-7
Interior and Exterior Noise Standards

Categories	Uses	CNEL	
		Interior[a]	Exterior[b]
Residential	Single family, duplex, multiple family, mobile home	45[c]	60[d]
Commercial and Industrial	Retail, restaurant	55	65
	Motel	45	60[d]
	Professional offices, movie theater, auditorium	45	65
	Manufacturing, utilities, warehousing, agriculture	65	75
Community Facility	Hospital, school, nursing home, church, library, civic offices, parks	45	65
Open Space	Passive outdoor recreation	—	60[d]

Source: City of Lompoc 2030 General Plan, Noise Element, Table N-1, 2014.
[a] *Interior areas exclude bathrooms, closet, and corridors.*
[b] *Exterior areas are limited to private yards or patios of residential uses; restaurant patios; motel recreation areas; office, theater, or hospital patios or assembly areas; school playgrounds; nursing home, library, or civic office assembly areas; and park picnic areas.*
[c] *If achievement of the interior noise standards requires that windows and doors remain closed, air conditioning or mechanical ventilation is required.*
[d] *In areas affected by aircraft noise, the standard is 65 CNEL with the stipulation that the noise level exclusive of the aircraft-generated noise cannot exceed 60 CNEL.*

The 2030 General Plan Noise Element states that the maximum exterior sound level acceptable for commercial and industrial areas, specifically, manufacturing and warehousing is 75 dB(A) CNEL; and for residential areas, specifically, single-family is 60 dB(A) CNEL. The maximum acceptable interior noise level for manufacturing and warehousing is 65 dB(A) CNEL and single-family residential uses is 45 dB(A) CNEL.

<u>Policy 1.1 requires each land use maintain noise levels at their property line in compliance with City standards.</u>

Policy 1.2 of the 2030 General Plan Noise Element requires a priority upon control of noise at the noise source.

Policy 2.1 requires noise standards presented in table entitled "Interior and Exterior Noise Standards" in determining land use designations and maximum noise levels allowable for new developments. In situations of overlapping Noise Standards, the lower noise level standard shall apply unless it can be found that the circumstances of the Project allow for a less conservative interpretation based on the specific type of use, the benefits of the Project, and the ability to mitigation noise impacts.

Policy 2.2 of the 2030 General Plan Noise Element requires an acoustical study for new development projects anticipated to either: (1) result in an ambient increase of five (5) dB(A) Ldn; or (2) produce noise within five (5) dB(A)/Ldn of the noise standard or greater than the noise standard for the proposed land uses(s) under existing or future conditions. Should noise abatement be necessary, the City shall require the implementation of mitigation measures based on a detailed technical study prepared by a qualified acoustical engineer.

Policy 2.3 requires to minimize noise exposure in the vicinity of the Lompoc Airport by maintaining consistency with the adopted Lompoc Airport Master Plan.

Policy 2.4 requires to continue to enforce its Noise Ordinance to minimize noise conflicts between adjacent land uses. The Noise Ordinance establishes noise limits that cannot be exceeded at the property line.

Lompoc Airport Noise Contour

Noise from the Lompoc Airport or the VAFB is dependent upon approach and takeoff flight patterns, as well as the distance between the sensitive uses and the airports. According to the Noise Element, n~~N~~oise levels from aircraft operations at the Lompoc Airport generate 65 dB nearest to the airport runway and 60 dB to the south of Central Avenue to north of the Santa Ynez River.[15]

City of Lompoc Noise Ordinance

The Health and Safety chapter of the Lompoc Municipal Code (LMC) sets forth standards, guidelines, and procedures concerning the regulation of noise in Lompoc. Section 8.08 of the LMC addresses noise sources originating from residential properties, businesses, vehicles, and construction activities, and includes various standards considered in determining whether a violation of this section exists. According to Section 8.08.030, Special Noise Source Prohibitions, of the LMC, construction of buildings and projects within 500 feet of a residential zone shall limit noise-generating construction activities to between the hours of 7:00 AM to 9:00 PM. The ordinance does not include quantitative standards or thresholds of significance for construction noise, steady-state sources of noise, and periodic sources of noise such as vehicle loading. In addition to construction noise, the Ordinance sets forth limits on vehicles and motorized refrigeration systems to between the hours of 6:00 AM and 10:00 PM.

ENVIRONMENTAL IMPACTS

Threshold of Significance

To assist in determining whether a project would have a significant effect on the environment, the City finds a project may be deemed to have a significant noise impact, if it would:

Threshold 4.10-1 **Exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies?**

Threshold 4.10-2 **Exposure of persons to or generation of excessive groundborne vibration or groundbourne noise levels?**

Threshold 4.10-3 **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

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15 City of Lompoc, 2030 General Plan Noise Element, Figure N-3.

Threshold 4.10-4 **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Threshold 4.10-5 **For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public-use airport, exposure of people residing or working the project area to excessive noise levels?**

Threshold 4.10-6 **For a project within the vicinity of a private airstrip, would the project expose people residing or working the project area to excessive noise levels?**

Methodology

Construction

Construction Noise

The construction noise modeled is based on information obtained from the FTA Roadway Noise Construction Model (RNCM). The FHWA has compiled data on noise-generating characteristics of specific types of construction equipment.[16]

The dominant source of noise from most construction equipment is engine sound. ~~, often without sufficient muffling.~~ Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in one location for one or more days at a time, with either a fixed power operation (e.g., pumps, generators, compressors) or a variable power operation (e.g., pile drivers, pavement breakers). It is important to note pile drivers would not be utilized during construction. Mobile equipment moves around the construction site (e.g., bulldozers, loaders) or to and from the Project site (e.g., trucks). **Figure 4.10-7, Noise Levels of Typical Construction Equipment,** shows the typical noise levels in dB(A) of different types of construction equipment at a distance of 50 feet from the source.

16 Federal Highway Administration, Roadway Noise Construction Model (RCNM), Software Version 1.1 (December 8, 2008).

The operational noise model for OHV use is based on the noise-level limits established by the Off-Highway Motor Vehicle Recreation Act of 2003 and California Vehicle Code, Section 38370.

To quantify specific engine noise from the types of vehicles that would use the drag strip, controlled vehicle engine tests were conducted. Four types of race vehicles were brought on site that ranged from 2,000 to 3,500 pounds in weight and 450 to 700 horsepower, respectively.

A SLM was placed approximately 15 feet from the individual test vehicle and engines were accelerated and decelerated for 5 minutes to simulate race conditions. The 5-minute simulation was completed for four (4) separate times for each test vehicle (a total of 16 test simulations). The vehicles remained stationary while the engines were accelerated and decelerated. An additional simulation was conducted that included the simultaneous acceleration and deceleration of the two loudest race vehicles (532 and 632 horsepower) to simulate drag race conditions.

~~The operational noise model for drag strip use is based on pass-by tests conducted utilizing similar vehicles that would be operated during implementation of the Project. Four vehicles were tested separately for approximately 5 minutes. To simulate drag race conditions, engines were accelerated three times within a 5-minute span to capture peak noise measurements. In addition, two of the louder vehicles were recorded simultaneously during a 5-minute span to capture cumulative worst-case conditions. These standards and measurements were then programmed into the SoundPLAN modeling system.~~

The ambient noise levels at surrounding sensitive receptor locations were determined based on measurements obtained with noise meters. The operational noise levels were calculated for sensitive receptor locations using SoundPLAN. The SoundPLAN model can include real world noise levels and contains noise data in a reference library. The OHV noise levels utilized in the model included ~~a total sum value~~noise levels of 114.2 dB(A) per vehicle at a pass-by distance of 100 feet. It is important to note the measured noise for the on-site drag strip vehicle noise tests resulted in a peak maximum level of 104.6 dB(A), lower than the reference source in the SoundPLAN reference library. Therefore, the noise source from the SoundPLAN reference library was used to simulate a worst-case condition.

Also, the modeling accounts for large differences in topography, and the presence of intervening structures or landscaping that would block a direct line of sight between operation activity from the Project site and nearby homes.

heavy construction equipment would not generate substantial levels of vibration that would cause annoyance at the off-site-vibration-sensitive uses. Accordingly, vibration impacts to people would be less than significant.

A significant vibration impact from construction equipment to non-engineered timber and masonry buildings would be 78 VdB. The majority of construction activities would occur at distances greater than 75 feet, resulting in vibration~~s~~ levels to below the threshold criterion for non-engineered timber and masonry buildings at the nearest sensitive receptor. Therefore, the Project would result in less than significant vibration impacts.

Threshold 4.10-5 **For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public-use airport, exposure of people residing or working the project area to excessive noise levels?**

The Lompoc Airport is a public use airport and is located approximately immediately south of the Project site. According to the 2030 General Plan Noise Element, the Project site is located within the 60-65 dB(A) airport noise contour.[21] In addition, the proposed uses are permitted according to the 1993 Airport Land Use Plan (ALUP) prepared by the Santa Barbara County Association of Governments, and the Project site is located within the 60-65 dB(A) CNEL airport noise contours.[22]

Standard construction techniques would attenuate exterior to interior noise levels a minimum of 20 dB(A). As previously stated, the City's exterior noise level for commercial and industrial land uses is between 65 and 75 dB(A). Therefore, uses proposed by the Project would be compatible with the City's General Plan and the ALUCP's requirements for exterior and interior noise levels. Thus, people working on site would not be exposed to excessive noise levels and impacts would be less than significant.

Threshold 4.10-6 **For a project within the vicinity of a private airstrip, would the project expose people residing or working the project area to excessive noise levels?**

The Project is not within the vicinity of a private airstrip. Therefore, the Project would not expose residents or employees to excessive noise levels within the vicinity of a private airstrip. Accordingly, no significant impacts would occur.

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21 City of Lompoc, *2030 General Plan, Figure N-3 Airport Noise Exposure.*

22 Santa Barbara County Airport Land Use Commission, *Santa Barbara Airport Land Use Plan: Noise Compatibility Policy Map, Lompoc Airport* (April 2012).

Neighborhood and Community Parks and Recreation Centers

Table 4.12-1, Existing Lompoc Park and Recreational Facilities, provides information for City-owned park and recreation facilities regarding type, acreage, and amenities.

It should be noted that local recreational opportunity provides amenities similar to those of the proposed Project, is an existing youth motocross park located within the City. The City operates an existing youth motocross park, the Kids Moto Fun Park, which operates year-round on Saturdays, Sundays, and holidays from 10:00 AM to 4:00 PM. The Kids Moto Fun Park is run by volunteers from the Lompoc Valley Park and Recreation Pool Foundation under agreement of the City's Memorandum of Understanding (MOU).[2] The site offers a free, interim facility for children up to age 12 and includes a 0.25-mile beginner's Off-Highway-Vehicle (OHV) course geared for motorcycles and all-terrain vehicles (ATVs). Additional amenities include parking, a safety class and training room, first aid area, restrooms, and benches/sunshade area.[3]

Proposed Project site Conditions

The proposed Project site is currently undeveloped and contains abandoned industrial uses such as former building slabs, debris, and dirt roads. The proposed Project site does contain the Skydive Santa Barbara landing area. There are no recreational uses including trails used for hiking or biking on site.

2 California State Parks, Off-Highway Motor Vehicle Recreation, Lompoc Valley Park and Recreation Pool Foundation

3 City of Lompoc, Parks and Recreation Department, Kids Moto Fun Park; http://www.cityoflompoc.com/Parks_Rec/KidsMotoFunPark.htm

Council recognizes the shortage of adequate parklands within Lompoc and developed this Code ~~in~~ pursuant to Government Code Section 66477 (Quimby Act). The Code provides for the payment of fees or dedication of land, or combination thereof, for the development of new or the rehabilitation of existing neighborhood community parkland or recreational facilities.

City Ordinance 1479 (03)

City Ordinance 1479 (03) amends the density factors for calculation of Park Improvement Fees and Land Dedication. The amendment requires the fee calculation to be based on 5 acres of land per 1,000 residents. The park impact fee shall be equal to Citywide average fair market values of land and calculated to a per unit price.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In order to assist in determining whether a Project would have a significant effect on the environment, the City finds that a Project may be deemed to have an impact on recreation if it would:

Threshold 4.12-1 **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

Threshold 4.12-2 **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

Project Design Features

The proposed Project would include the following recreational features:

<u>OHV Riding Areas</u>

Beginner riding area containing two tracks on approximately 0.6 acres of land.

1/8-mile, 130-by-240-foot oval track for cycles, ATVs, and carts.

Clay, with 2-foot banking, and sited on approximately 0.83 acres.

100-by-250-foot endurocross track on approximately 0.57 acres.

100-by-250-foot arenacross tract on approximately 0.57 acres.

20-by-1,320-foot rhythm track on approximately 4.6 acres.

Motocross track/mud bog and sand drag lanes area on approximately 4.6 acres.

Trail ride area on approximately 2.3 acres.

County of Santa Barbara General Plan Circulation Element

The County of Santa Barbara General Plan Circulation Element is one of the seven Elements mandated by State law for inclusion in County and City General Plans. The Circulation Element identifies key roadway links throughout the unincorporated areas of the County, and along with the other elements of the Comprehensive Plan, guides decisions regarding new development.

The County Circulation Element includes policy capacity levels that are defined for the various roadway classifications which are applied in making findings of project consistency with the County Circulation Element. The County Circulation Element also defines intersection standards in terms of level of service and provides methodology for determining project consistency with these standards.

Roadway Standards: The policy capacities provided in the County Circulation Element shall be used as guidelines for evaluating consistency the County Circulation Element. A project's consistency with the County Circulation Element shall be determined as follows:

a. A project that would contribute ADTs to a roadway where the Estimated Future Volume does not exceed the policy capacity would be considered consistent with this section of this Element.
b. For roadways where the Estimated Future Volume exceeds the policy capacity but does not exceed the Acceptable Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway was less than or equal to 2 percent of the remaining capacity of that roadway or 40 ADT, whichever is greater.
c. For roadways where the Estimated Future Volume exceeds the acceptable capacity but does not exceed Design Capacity, a project would be considered consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 25 ADT.
d. For roadways where the Estimated Future Volume exceeds the design capacity, a project would be consistent with this section of this Element only if the number of ADTs contributed by the project to the roadway does not exceed 10 ADT.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

To assist in determining whether a project would have a significant effect on the environment, the City finds a project may be deemed to have significant traffic and circulation impacts if it would:

Threshold 4.13-1 **Conflict with an applicable plan or ordinance policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

As discussed under Impact 4.13-1 for Site Access and Circulation, there is adequate viewing access and gaps for vehicles during the weekday to safely enter and leave the proposed Project site via George Miller Drive. Additionally, for larger weekend events which would utilize V Street, **Mitigation Measure 4.13-2** would be implemented in order to provide safer access for pedestrians and vehicles entering and leaving the site. Accordingly, impacts would be less than significant.

Threshold 4.13-5 Result in inadequate emergency access?

The proposed Project would provide sufficient room for emergency vehicles to maneuver in and out of the proposed Project site. As stated above, during the weekday events, emergency vehicle access would be provided by George Miller Drive. Additionally, the proposed drag strip includes an emergency vehicle parking and turnaround area. As discussed above, **PDF 4.13-1**, would require a construction traffic control plan and a construction route program be developed and implemented to minimize temporary lane closure impacts on emergency services. As such, the improvements and site access and circulation features would not result in inadequate emergency access for the project. Impacts would be less than significant with mitigation.

Threshold 4.13-6 Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As discussed above, there is an existing Class I bike path (Allan Hancock College Bike Path) that runs along the west side of SR 1 in the vicinity of the Airport and Class II Bikeways are present on Central Avenue in the vicinity of the Project site. Additionally, sidewalks are provided along H Street and Central Avenue in the Project vicinity. Pedestrian circulation on-site within the proposed drag strip area would be provided via pedestrian paths, a crosswalk, and a future pedestrian bridge as shown in **Figure 3.0-5.**

Currently, the COLT Route 4 utilizes Central Avenue along the southern portion of the proposed Project site. The nearest bus stop is located in Mission Plaza shopping center, adjacent to the Lompoc Corners Shopping Center. Service is provided between 6:30 AM to 8:00 PM on weekdays, and between 9:00 AM to 5:00 PM on Saturday. Destination to destination ADA service is available for prequalified seniors and persons with disabilities. The proposed Project site would not impact the existing COLT Route 4 transit stops and COLT would continue to provide bus route services along Central Avenue. Overall, the proposed Project would not impact existing public transit, bicycle, or pedestrian facilities. Impacts would be less than significant.

Cumulative Impacts

Weekday PM Peak Hour

The cumulative traffic volumes forecasts for the weekday PM peak hour for the study area intersections are shown on **Figure 4.13-8, Cumulative Traffic Volumes – Weekdays**. The cumulative analysis was based on a list of approved and pending projects provided by the City staff, which includes all projects within the City as well as adjacent areas of Santa Barbara County, accounting for both local and regional growth in the study area, as listed in **Section 4.0**.

and provide potable water to the concessions stands on the west side of the Project site, and to the north concession stands. This water would be provided by the City from its existing water treatment facility and delivered to the site via an existing potable water meter located along the existing gate on George Miller Drive.

Nonpotable water for use to for dust control during OHV events would be supplied to the Project site from a new well that may be drilled on site. The well would be drilled within the first 6 to 9 months, and is anticipated to provide approximately 200 gpm of water which will be collected and stored in a 5,000-gallon storage tank next to the well. Up to approximately 23,000 feet of a new 4-inch line would be installed to provide nonpotable water to the OHV areas tracks, the drag strip and trail riding area.

While there are existing fire hydrants along George Miller Drive, there are currently none on the Project site. Two fire hydrants are proposed to be constructed on the Project site in accordance with Lompoc Fire Department requirements. A new 10- inch fire hydrant main with a shutoff valve would connect into the City's existing water supply line on George Miller Drive. The new fire hydrants with shutoff valves would be located at the western end of the drag strip and in the OHV pit area, as shown in Figure 3.0-10.

The proposed Project will not require any irrigation for landscaping. As the waster to be used on site forom the well will not be treated, the proposed Project would not require the construction of new water treatment facilities.

Impacts would be less than significant.

Threshold 4.14.1-2 Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Operation of the proposed Project would be required to reduce dust and for onsite use at concession facilities during events on site.

Nonpotable water from the onsite well would be used to control dust. Water consumption for dust watering was estimated assuming watering for 15 minutes every hour, and using the construction watering amount of 0.89 acre-feet/acre of water. The total area of the Project that would need to be watered for dust control is approximately 11.77 acres which includes the OHV area comprised of the beginner's track, the oval track, the endurocross and trials area, the arena cross area, and the motocross/mud bog and sand drag lanes.

Urban Water Management Plan).[22] The proposed Project's 7.95 afy would account for approximately 5 percent of the increase in projected water demand in the commercial, institutional, and industrial sectors over the next 20 years. Therefore, the City has adequate water supplies to meet the demands of the proposed Project. It should be noted that the proposed Project will be required to offset potable water demand pursuant to Section 13.04.070(e) and (f) of the LMC.[23]

Accordingly, impacts would be less than significant.

Table 4.14.1-10
Proposed Potable Water Demand for the Project

		Average Attendance Per Day				Water Use		Total Water Use	
Event	Days	Spectators	Participants	Pit Crew	Staff	Spectators and Pit Crew[1]	Participants and Staff[2]	Total Water Use per Year (gpy)	Total Water Use per Yea (afy)
Major Event (52-Weekends a year)	104	1,200	300	1,080	40	8,400	14,200	2,350,400	7.21
Weekday OHV Event (Mon-Thurs 50 Weeks, Friday 52 Weeks)	252	30	50	23	10	210	830	1,040	0.003
Weekday Drag Strip Event (Wednesday 50 weeks)	50	100	100	300	10	700	4,100	240,000	0.74
							Total Potable Water Demand	**2,591,440**	**7.95**

1 Spectators and Pit Crew assumed to use 7 gallons per person per day based on comparable studies for similar racetracks. (Wood Rodgers. 2004 (Revised April 19). Preliminary Water Study Riverside Motorsports Park. Merced County, California. Draft. Prepared for Riverside Motorsports Park and Granite Construction Company).
2 Participants and Staff assumed to use 10 gallons per day based on factors from California Speedway (EIP 1995) and Sears Point Raceway (EIP 1999).
Note: gpy = gallons per year; afy = acre-feet per year.

Cumulative Impacts

A cumulative increase in water demand could cause potentialy impacts to the City's existing and future water supplies, as well as the Lompoc Plain Sub-basin. As previously discussed, increases in groundwater pumping at City wells—which are relatively close to the Santa Ynez River—cause an equal increase in percolation from the river. Nevertheless, if groundwater levels start showing a significant downward trend

22 The total projected 146 afy water demand increase includes the 137 afy increase from the commercial and institutional sector and the 9 afy increase industrial sector.
23 Lompoc Municipal Code 13.04.070 Water Efficient Landscape and Irrigation Standards.

during a drought, the City would implement actions~~would~~ to reduce demand and increase conservation. The City's 2010 UWMP also contains a Water Shortage Contingency Plan that contains four stages of action to reduce the City's water demand during a drought period. Accordingly, cumulative impacts would be less than significant and the proposed project's contribution would not be cumulatively considerable. The Water Shortage Contingency Plan is being updated and completely revised in the 2015 Urban Water Management Plan.

Mitigation Measures

No mitigation measures would be required.

Level of Significance after Mitigation

Impacts would be less than significant.

Wastewater Infrastructure

An existing 6-inch sewer line is located beneath V Street and an existing 10-inch sewer line is located beneath Barton Avenue. These lines transition to an existing 12-inch sewer line that is located beneath Central Avenue. The Project site currently does not generate any wastewater that is conveyed into the City's sewer system.

Surface Water Drainage Infrastructure

All storm water systems are maintained by the City. The City's stormwater infrastructure consists of channelized drainages, detention basins, standard storm drain inlets and sub-surface storm drainage systems, and curbs and gutters.[27] There are also existing storm water drains south of the Project site along Central Avenue. The City's streets are designed to accommodate storm flows until the Santa Ynez River level recedes.[28] These storm water flows terminate at the LRWRP. No storm drains exist within the Project site.

Regulatory Framework

Federal

In 1972, the Federal Water Pollution Control Act (Clean Water Act)[29] was amended to prohibit the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act focused on tracking point sources, primarily from wastewater treatments plants and industrial waste dischargers, and required implementation of control measures to minimize pollutant discharges.

State

Regional Water Quality Control Board

The SWRCB and the Regional Water Quality Control Boards (RWQCBs) are the principle state agencies with primary responsibility for the coordination and control of water quality. In the Porter-Cologne Water Quality Control Act (Porter-Cologne), the California legislature declared that the "state must be prepared to exercise its full power and jurisdiction to protect the quality of the waters in the state from degradation."[30] Porter-Cologne grants the board's authority to implement and enforce water quality laws, regulations, policies, and plans to protect the state's groundwater and surface waters.

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27 City of Lompoc, *General Plan Update EIR* (October 2009).
28 City of Lompoc, *General Plan Update EIR* (October 2009).
29 Federal Water Pollution Control Act (Clean Water Act), 33 USC sec. 1251–1387 (October 18, 1972), as amended.
30 State Water Resources Control Board, "Porter Cologne Water Quality Control Act," California Water Code, div. 7. Water Quality, effective January 1, 2008.

Events of 172 pounds per 100 visitors per year or 0.00086 tons/visitor/year.[40] The disposal rate for Other Miscellaneous Services has not been updated since the originally 1999 study and therefore staff and participants will use the disposal rate of 0.9 tons/employees/year.[41] The number of employees and guests would vary depending on the type of event; therefore, the calculations of waste generations account for these variations.

The proposed Project, when combined with the 2014 tons of solid waste disposed of by the City and unincorporated areas, would generate approximately 30,394 tons of solid waste per year. The combined tons of solid waste disposed in 2014 with the proposed Project would total an approximate 83 tons/day and would not exceed the total disposal capacity of the Lompoc Sanitary Landfill, nor the daily limit of 400 tons/day. There would be adequate daily capacity to accommodate the solid waste demands of the proposed Project.

Impacts would be less than significant.

Threshold 4.14.3-2 Comply with federal, state, and local statutes and regulations related to solid waste.

As required by the City, the proposed Project would implement a waste diversion program in an effort to reduce solid waste impacts on existing landfill capacities, similar to the state's waste diversion goal of 75 percent as identified by state law (SB 1016 and AB 939). The proposed Project would be required to divert up to 75 percent of its operational solid waste by 2020. Since the proposed Project would implement mitigation similar to regulations set forth in the CIWMP and other local and state regulations, impacts would be less than significant.

Cumulative Impacts

The Project and related projects would contribute to the cumulative amount of solid waste that is disposed of within the Lompoc Sanitary landfill system. However, the proposed Project in conjunction with other projects within the area would generate a total amount of waste that could be accommodated by existing landfills and would not contribute to cumulatively significant impacts to landfill capacity such that all landfills exceed their capacity.

~~, June 2006.~~ 41 Statewide Waste Characterization Study, Results and Final Report, Table 13: Per-Employee Disposal Rate and Estimate Contribution of Each Industry Group to Commercial Waste, page 18, http://www.calrecycle.ca.gov/Publications/Documents/LocalAsst/34000009.pdf, December 1999.

41 Statewide Waste Characterization Study, Results and Final Report, Table 13: Per-Employee Disposal Rate and Estimate Contribution of Each Industry Group to Commercial Waste, page 18, http://www.calrecycle.ca.gov/Publications/Documents/LocalAsst/34000009.pdf, December 1999.

site criteria for the proposed Project objectives as listed in Alternatives Evaluated in Detail below. To accommodate a proposed motorsports park, a site needs to be approximately 38 acres in size to provide enough land for the facilities and parking. To accommodate the traffic generated by the proposed Project, a suitable site needs to have efficient access to local roadways, which connect to regional roadways, such as State Route 1 (SR 1) and/or State Route 246 (SR 246). Additionally, the proposed Project site aims to remediate and restore land along the Santa Ynez River, to improve existing skydiving landing areas, to provide for implementation of mitigation pursuant to previous work associated with the Lompoc Airport Runway Expansion Project if still required, to improve runway safety zones, and to reduce illegal riding in the Santa Ynez River bed and street racing.

Alternative Site A

As shown in **Figure 5.0-1**, Alternative Site A is comprised of approximately 29,320 acres and owned by the US government, as well as Freeport McMorman, an oil and gas operating company. Alternative Site A is located approximately 3.5 miles north of the proposed Project site within Santa Lucia Canyon on Vandenberg Airforce (Airforce) property. That site is located within Santa Barbara County and its zoning designation is AG-II-100.

The development of the proposed Project at Alternative Site A was initially considered, but ultimately rejected for a number of reasons. There have been past efforts to place a drag strip on Airforce property and no agreement could be reached with the Airforce. Additionally, because that site is located within Santa Barbara County, the City would need to either purchase the land or enter into an agreement with both the Airforce and the County to process the motorsports facility at that site. The site is currently located on land zoned for agriculture use, and as such, there could be a potentially significant impact to agriculture resources at that location. Furthermore, a zone change would be required as an outdoor recreation use would be inconsistent with the Santa Barbara County AG-II-100 zone. The removal of agricultural land around the City limits would be inconsistent with Policy 1.3 of the City's 2030 General Plan. The site has been used in the past to extract oil and gas, and consequently, there are several active and plugged oil and gas wells located on the site which would create potentially significant hazards to a motorsports park facility. Infrastructure, including connecting roadways, water and electric lines would need to be developed and installed at this site to provide adequate service for a motorsports park facility. Accordingly, there could be additional potentially significant impacts to traffic and utilities during construction and operation. The nearest sensitive receptors are located ~~to~~ approximately 0.75 miles south of the site. Consequently, additional air quality and noise impacts could occur. The proposed Project impacts would likely shift to the alternative site and could potentially be greater.

Greenhouse Gas Emissions

Under the No Project/No Development Alternative, no construction activities or construction-related vehicle trips would occur; and the short-term emissions related to construction activities would be avoided. Since the proposed Project would not be developed, the emissions generated by operation of the proposed Project would also be avoided. As discussed in **Section 4.6, Greenhouse Gas Emissions,** there are no potentially significant greenhouse gas (GHG) emission impacts associated with the proposed Project. Even so, implementation of this Alternative would result in less GHG impacts when compared to the proposed Project.

Hazards and Hazardous Materials

No development would occur on the proposed Project site with implementation of the No Project/No Development Alternative. Accordingly, there would be no increase in the use, transportation, and disposal of hazardous materials and the potential risk of exposure to these hazards would not increase. Additionally, since no new participants, pit pass holders, spectators, or workers would be introduced to the site, people would not be exposed to any risks related to the proximity of the site to the Lompoc Airport. Therefore, this Alternative would result in fewer impacts than under the proposed Project.

Hydrology and Water Quality

Under this Alternative, the proposed Project site would remain in its current condition, and no grading or development would occur. Existing stormwater flows across the proposed Project site would continue to occur and the existing hydrologic and drainage patterns would remain unchanged. Hydrology and water quality impacts during construction of the proposed Project would not occur. The proposed Project would incorporate Project Design Features and Best Management Practices to ensure impacts associated with hydrology during proposed Project operation would be less than significant, even so, impacts under this Alternative would not occur; and, thus, would be less than the proposed Project. Since the site is currently vacant and would remain so under this Alternative, Alternative 1 would not result in soil erosion and sedimentation impacts. Nonetheless, it is conservatively estimated hydrology and water quality impacts would be less under this Alternative when compared with the proposed Project.

Land Use and Planning

With the No Project Alternative, there would be no changes in existing land use conditions or in the local or regional land use planning and regulatory frameworks that currently govern the proposed site. Accordingly, there would be no land use impacts. None of the objectives and economic benefits of the proposed Project would occur. There would be no development in the proposed Project area that might improve the City's economic base. This Alternative would avoid the potentially significant impacts to

aircraft and persons onsite during motorsports events. This alternative, like the proposed Project, would not divide an established community and would have no effect on any habitat conservation plans.

Noise

No construction activities would occur with this Alternative, and temporary noise impacts from construction would not occur. As this Alternative would not result in new development, there would be no increase in traffic. In addition, the No Project/No Development Project would not include the introduction of operational noise sources such as OHVs and drag race events and noise from spectators. Nevertheless, impacts from noise would be less under this Alternative than under the proposed Project.

Public Services

With no changes in existing conditions, there would be no impact on any public services and no need to extend any of the City's municipal services to serve new development or existing uses. As discussed in **Section 4.11, Public Services**, extension of the full range of municipal services to the proposed Project site would not result in any significant impacts. There would be a less than significant effect on police and fire protection services. Although the proposed Project would have no significant and unavoidable impacts on public services, under this Alternative, impacts would be less than under the proposed Project.

Recreation

With the No Project/No Development Alternative, development of the proposed Project site would not occur. The proposed Project would provide Lompoc residents and regional visitors recreational amenities thus increasing the parkland to resident ratio. The existing parks and recreation services that support the local area would remain as is; thus, no potential significant impacts on parks and recreation facilities would occur under this Alternative. Although the proposed Project will have no significant and unavoidable impacts on parks and recreation facilities, under this Alternative, impacts would be less than under the proposed Project.

Traffic and Circulation

Under the No Project/No Development Alternative, no short-term (construction) or additional long-term (operational) vehicle trips would be generated on roadways on and adjacent to the proposed Project site. The proposed Project would result in less than significant construction and operational impacts with implementation of Project Design Features and Mitigation Measures. However, this Alternative would avoid construction and operation related traffic impacts of the proposed Project. Therefore, potential construction and operational impacts related to transportation and traffic would be less than those of the proposed Project.

Furthermore, operational activities with Alternative 2 would result in 1,462 more daily trips when compared to the proposed Project. A doubling of traffic volumes would result in an increase in noise levels of 3 dBA. Long-term operational noise generated by traffic under this Alternative would increase by approximately 1.5 dBA when compared to the proposed Project. This is due to the substantial increase in the amount of traffic generated by this Alternative. A 3 dBA increase in roadway noise levels is noticeable. Therefore, impacts under this Alternative would be comparatively greater than the proposed Project.

Operations under this Alternative would require the use of a heating, air conditioning and ventilating (HVAC) system. Typically, that type of equipment produces noise levels of approximately 56.0 dB(A) at 50 feet from the source. The most audible increase in noise from the proposed Project would come from the Drag Strip Racing and OHV Trail Ride Area which would cause a 2.1 dB increase above ambient conditions to 64 dBA. Offsite noise levels under this Alternative would result in lower noise levels when compared to the proposed Project. However, impacts would be less than significant for both the proposed Project and this Alternative and noise impacts would be incrementally less than the proposed Project.

Public Services

Under this Alternative, impacts associated with fire protection and law enforcement would be similar to the proposed Project. The development potential under existing City zoning would be similar to the level of development that could occur under the proposed Project. Moreover, future development would be subject to City review and any conditions established by the City at that time. Under this Alternative, all commercial development would comply with the most current adopted fire and building codes and standards and all applicable development impact fees would be paid to the City. Therefore, implementation of this Alternative would not result in the need for new or the physical alternation to any existing governmental facility in regards to fire protection or law enforcement, and impacts would be less than significant. Accordingly, this Alternative would have similar impacts to those of the proposed Project, both of which are less than significant

Recreation

Under this Alternative, a structure could be developed~~ment~~ on the site pursuant to the PF zone. The proposed Project would provide Lompoc residents and regional visitors recreational amenities, thus increasing the parkland to resident ratio. Under this Alternative, the development may not include recreation uses nor would it result in the direct generation of new residents within the City who would utilize~~d~~ existing recreational facilities. The existing parks and recreation services that support the local area would remain as is; thus no potential significant impacts on parks and recreation facilities would occur under this Alternative. Although the proposed Project will have no significant and unavoidable

impacts on parks and recreation facilities, under this Alternative, impacts would be similar to the proposed Project.

Traffic and Circulation

Implementation of this Alternative would ~~could~~ include professional offices, government uses, or non-governmental uses, such as a non-profit organization. Since the number of trips generated would be a function of the total size of the non-residential building gross floor space developed, Alternative 2 would be expected to generate 3,780 non-residential trips on weekdays more than the proposed Project. This Alternative would generate 1,462 weekday trips more than the proposed Project. Impacts associated with the study intersections would be greater than the proposed Project due to the increase number of weekday trips. However, with similar Project Design Features and Mitigation Measures, as those identified for the proposed Project, the traffic and transportation impacts associated with this Alternative would be less than significant. Even though the proposed Project and this Alternative will not have any significant impacts relating to traffic, impacts under this Alternative would be comparatively greater than under the proposed Project.

Utilities and Service Systems

Water

This Alternative would result in the construction of approximately 331,000 square feet of commercial area. The water demand associated with this Alternative would be approximately 37 afy.[2] The aquifer and other sources of supply are adequate for a single dry year and also multiple dry years for a 20-year period. Like the proposed Project, this Alternative would require additional water infrastructure to serve the site. Since the water demand associated with this Alternative is greater than the proposed Project's water demand of 8.75 afy, this Alternative would result in greater impacts to water service. Even though neither the proposed Project nor this Alternative would result in any significant impacts, impacts associated with this Alternative would be greater than those under the proposed Project.

Sewer

Under this alternative, a different development could be permitted by the existing land use designations. For purposes of analysis, an office building was assumed to be developed on site. This would require the extension of existing sewer lines to the site. In addition, this Alternative would generate approximately 9,06,125 gallons of wastewater per year, or 0.02 million gallons per day. The proposed Project would

2 Commercial Uses = 100 gallons per 1,000 square foot * 331 thousand square feet = 12,081,500 gallons per year, or 37 acre-feet per year.

generate approximately 0.05 million gallons per day. As discussed in **Section 4.14, Utilities and Service Systems**, there is available treatment capacity at the wastewater treatment plant and impacts would be less than significant under this Alternative. Even though neither the proposed Project nor this Alternative would result in a significant impact, impacts associated with this Alternative would be comparatively greater than those of the proposed Project.

Solid Waste

Under this alternative, a different development could be permitted by the existing land use designations. For purposes of analysis, an office building was assumed to be developed on site. This Alternative would generate approximately 794 tons per year of solid waste.[3] The proposed Project would generate approximately 139 tons per year. As discussed in **Section 4.14, Utilities and Service Systems**, there is available disposal capacity at the Lompoc Sanitary Landfill and impacts would be less than significant under this Alternative. Even though neither the proposed Project nor this Alternative would result in a significant impact, impacts associated with this Alternative would be comparatively greater than those of the proposed Project.

Energy

The electricity demand associated with this Alternative would be approximately 3.5 million kilowatt hours[4] (kW) per year. Since the electricity demand associated with this Alternative is less than the proposed Project's energy demand of 3.8 million kWh per year, this Alternative would result in less impacts to electricity service. Even though neither the Project nor this Alternative would result in any significant impacts, impacts associated with this Alternative would be less than those under the Project.

Summary of Comparative Impacts

This Alternative would result in similar impacts related to aesthetic, biology, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use, public services, and recreation. Impacts would be incrementally less under this Alternative and would include those related to noise and energy. Development under this Alternative of parcels within the site as permitted by the PF zone allowed by the Zoning Code are different than what is proposed with the proposed Project. Aesthetic impacts related to this alternative may be more visually intensive, as there would be a single large building in the center of the area and less of an open design concept. This alternative would develop a building,

3 2.4 tons per 1,000 square feet for commercial uses * 331 thousand square feet = 794 tons per year.

4 10.5 kWh/square foot/year * 331,000 square feet = 3,475,500 kWh per year.

Geology and Soils

Construction under this Alternative would include similar grading and excavation activities; however, they would be limited to a smaller portion of the 38-acre site. Grading and excavation activities would be identical and would result in similar erosion and sedimentation impacts to those of the proposed Project. Any future development within the site would have to comply with the CBC requirements for seismicity, liquefaction, subsidence, and expansive soils, similar to the proposed Project, which would mitigate potential significant impacts associated with the existing soils and geologicaly conditions of the site. This Alternative would be required to develop and implement a SWPPP along with all Project Design Features and Mitigation Measures of the proposed Project pertaining to erosion control plans. For this reason, the geology and soils impacts of this Alternative would be similar to the proposed Project and less than significant.

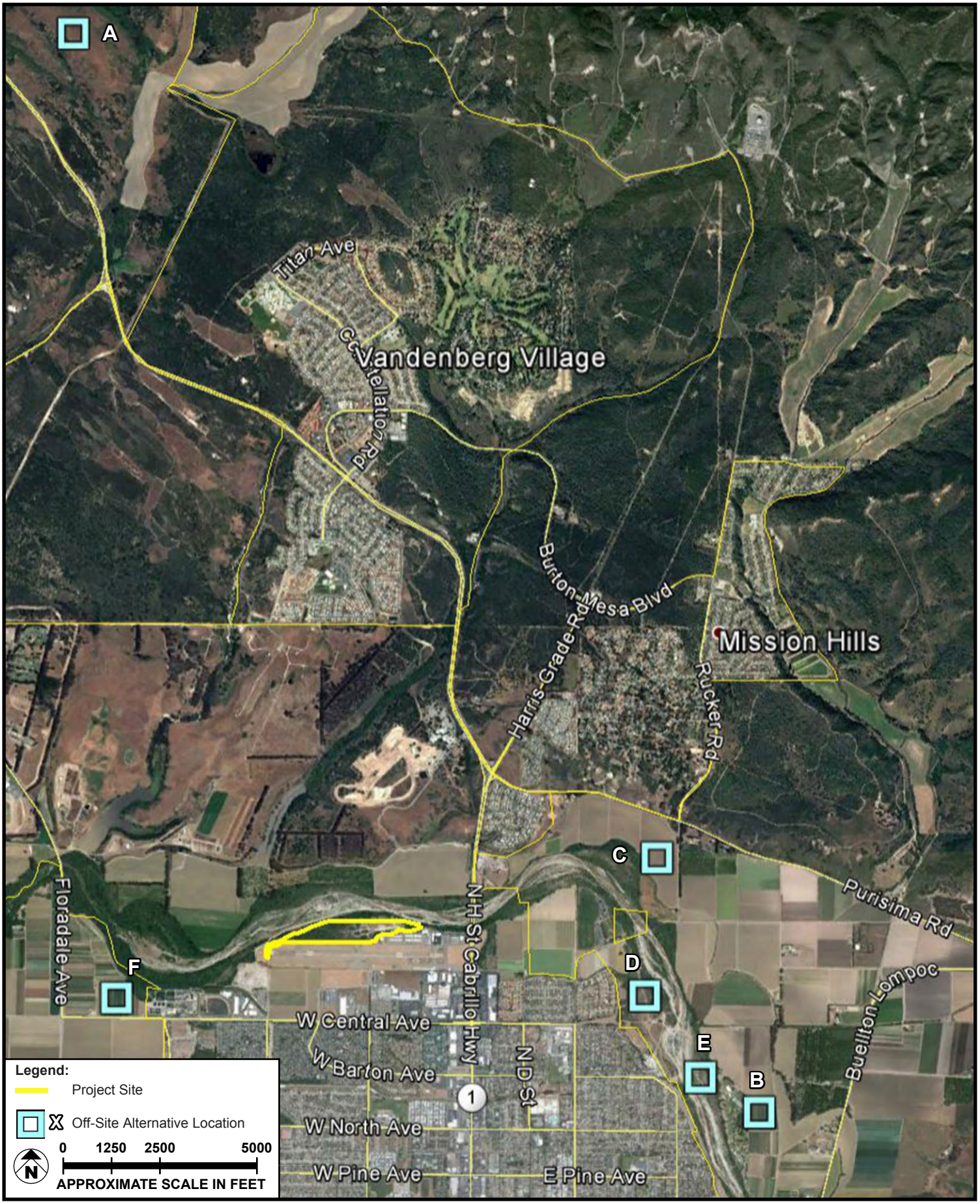
Greenhouse Gas Emissions

This Alternative would involve construction activities similar to those associated with the proposed Project to grade the site, install infrastructure and construct the OHV component of the motorsports facility. As stated previously, equipment use and vehicular travel related to construction activities and their respective emissions would be similar to that required for the proposed Project.

As discussed in **Section 5.6, Greenhouse Gas Emissions,** the operational GHG emissions for the proposed Project are estimated to emit 8,198.6 MTCO2e per year. This Alternative would reduce the number of mobile daily trips by 20 percent, which would result in fewer GHG emissions of 6,997.0 MTCO2e per year, or 1,201.6 MTCO2e per year fewer than the proposed Project. This Alternative would include similar Project Design Features and Mitigation Measures as those identified for the proposed Project. This Alternative would fall below the SBAPCD threshold of 10,000 MTCO2e per year and meet the draft per service population target, similar to the proposed Project. Overall, Alternative 3 would incrementally reduce impacts compared to the proposed Project.

Hazards and Hazardous Materials

While this Alternative would result in a density reduction on the 38-net acre proposed Project site, development would still occur and similar impacts to those of the proposed Project, but at a reduced intensity, would occur. The OHV uses could utilize fuels, lubricants, degreasers, solvents, hydraulic fluids, and cleaning compounds that have the potential to create a significant hazard to the public. This Alternative would not include the drag strip, which is closest to the Airport, however, SBCAG has determined that the Project does not need a determination of consistency required with the ALUP because the Project require only a discretionary permit. Additionally, with this alternative, it would not include the area that historically reported that an underground and/or above ground storage tank may



SOURCE: Google Earth - 2016

FIGURE **5.0-1**

Meridian Consultants

Off-Site Alternative Locations

054-003-13