

# Summit View Homes Project

*Final*  
**Environmental  
Impact Report  
Comments and  
Responses**

State Clearinghouse No. 2012071088  
EIR 12-01  
Annex No. 78  
GP 12-01, ZC 12-01

*Prepared by:*  
**City of Lompoc  
Community Development Department**

*Prepared with the assistance of:*  
**Rincon Consultants, Inc.**



**April 2013**

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*April 2013*

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# FINAL EIR

## COMMENTS and RESPONSES

### 1.0 INTRODUCTION

In accordance with § 15088 of the State California Environmental Quality Act (CEQA) Guidelines, the City of Lompoc, as the lead agency, has reviewed the comments received on the Draft Environmental Impact Report (Draft EIR) for the Summit View Homes Project and has prepared written responses to the comments received. The DEIR was circulated for the required 45-day public review period, beginning December 13, 2012 and concluding January 28, 2013.

Each written comment that the City received is included in this Comments and Responses document. Responses to these comments have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the EIR addresses pertinent environmental issues. The comment letters included herein were submitted by public agencies and private citizens.

The Draft EIR and this Comments and Responses report collectively comprise the Final EIR for the Summit View Homes Project. Any changes made to the text of the Draft EIR correcting information, data or intent, other than minor typographical corrections or minor working changes, are noted in the Final EIR as changes from the Draft EIR. This Comments and Responses report consists of this introduction (Section 1.0), Draft EIR clarifications and modifications/errata sheet (Section 2.0), and comment letters and responses to comments (Section 3.0).

The focus of the responses to comments is the disposition of environmental issues that are raised in the comments, as specified by § 15088 (b) of the State CEQA Guidelines. Detailed responses are not provided to comments on the merits of the proposed project. However, when a comment is not directed to an environmental issue, the response indicates that the comment has been noted and forwarded to the appropriate decision-makers for review and consideration, and that no further response is necessary.

### 2.0 DRAFT EIR CLARIFICATIONS and MODIFICATIONS/ERRATA

This section presents clarifications and modifications to information contained in the Draft EIR, based on the comments and responses presented in Section 3.0 of this report. Where a comment results in a change to the EIR text, a notation is made in the comment indicating that the text is revised. Additions are underlined (underlined) and deletions are printed in strike-through (~~strike-through~~) type. These changes are organized by the sections contained in the Draft EIR. The numbers in parentheses preceding each item refer to the applicable comment number from the comments and responses discussion in Section 3.0.



## Revisions to Executive Summary

- ❖ *(Comment 7.1)* Table ES-2 on page ES-9 has been revised as follows:

**Impact CR-1**      **No known archaeological resources have been identified on the project site and the presence of unknown archeological resources is unlikely. However, if during excavation archeological resources or human remains are unearthed, potentially significant impacts could occur. ~~implementation of the proposed project could adversely affect previously unidentified archaeological resources and/or human remains.~~ Impacts would be Class II, *significant but mitigable.***

~~**CR-1(a) — Archaeological Monitoring of Construction Activities.** Archaeological monitoring of project related ground disturbing activities shall be undertaken. In the event that cultural resources are exposed during project activities, the monitor shall be empowered to temporarily halt construction until the resource can be evaluated. At the conclusion of archaeological monitoring, a monitoring report summarizing the efforts and results shall be prepared and submitted to the City of Lompoc.~~

~~**CR-1(b) — Native American Monitoring of Construction Activities.** Native American monitoring of project related ground disturbing activities shall be undertaken. A local Chumash group, such as the Santa Ynez Band of Chumash Indians, shall be retained to conduct Native American monitoring during construction.~~

~~**CR-1(εa)      Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground disturbing activities, work in the immediate area shall halt and an archaeologist meeting the Secretary of the Interior's *Professional Qualifications Standards* for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing and/or construction activities associated with the proposed project, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a City-qualified archaeologist. An appropriate plan for the preservation of the artifacts from the site shall be prepared, and implementation of the plan shall be overseen by a City-qualified archaeologist prior to commencement of ground disturbing activities. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2.~~

~~**CR-1(δb)      Unanticipated Discovery of Human Remains.** If human remains are discovered during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the Santa Barbara County Coroner shall be notified immediately. If the human~~



remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. In the event that unknown human remains are encountered during grading, clearing, grubbing and/or construction activities associated with the proposed project, all excavation and ground disturbing work on or adjacent to the project site (or area of discovery) shall be stopped immediately in the vicinity. The Santa Barbara County Coroner shall be contacted and the Native American Heritage Commission shall be notified immediately. No further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The site shall be evaluated by the most likely Chumash descendant identified by the Native American Heritage Commission and a City-qualified archaeologist.

- ❖ (Comment 3.3) Table ES-2 on page ES-13 has been revised as follows:

**Impact GHG-1**     The project would generate short-term as well as long-term GHG emissions. These emissions would incrementally contribute to climate change. However, project emissions would not exceed the ~~1,100~~ 1,150 MT CO<sub>2</sub>E/year threshold. Impacts would be Class III, *less than significant*.

- ❖ (Comment 12.1) Table ES-2 on page ES-18 has been revised as follows:

**Impact PSU-9**     The proposed project would require electricity, telephone, and gas service. ~~Pacific Gas & Electric~~ City of Lompoc Electric, Southern California Gas Company, and ~~AT&T-Verizon~~ telephone company have adequate capacity to provide electricity, phone, and gas to the proposed project site. Therefore, impacts would be Class III, *less than significant*.

**Revisions to Section 2.0. Project Description**

- ❖ (Comment 12.3) The following revisions have been made to Table 2-2 in Section 2.0 *Project Description*.

**Table 2-2  
 Proposed Summit View Project Summary**

Lot Size	10.05-acres
Residential Units	44
Lot Access	Garden Gate Lane at the north of the project site.
Density	4.4 units per acre



**Table 2-2  
Proposed Summit View Project Summary**

Project Footprint	Building coverage: 2.39-acres (based on preliminary architectural design) Roads/Parking/Walkways: 2.79-acres Landscaping: 4.1-acres Open Space: 0.77-acres <b>TOTAL: 10.05-acres</b>
Parking	88 in garage spaces (in addition to two spaces in each driveway)
Community Amenities	Pedestrian connectivity and walkability On-site open space recreational area

- ❖ (Comment 12.4) The second paragraph on page 2-7 in Section 2.0 *Project Description* has been revised as follows:

Stormwater Infrastructure. One of the open space lots on the southwest corner of the project site would be used for stormwater detention and infiltration, refer to Figure 2-4 *Proposed Drainage Plan*. Stormwater runoff would be detained in this basin to reduce peak runoff levels at or below those of the undeveloped site condition. The basin would have a total volume of approximately 20,000 cubic feet and would be constructed of graded earth with 4:1 side slopes and a concrete spillway for overflow. Stormwater runoff from the project site would be collected in an existing 21-inch reinforced concrete pipe (RCP) culvert, at the southwest corner of the property that is currently conveyed under Purisima Road to the south and would continue in a culvert under Highway 1 to the west, eventually leading to the Santa Ynez River. Runoff would also be collected ~~from~~ by an existing 24-inch RCP culvert, and conveyed under Harris Grade Road and Highway 1, eventually leading to the Santa Ynez River.

- ❖ (Comment 12.5) The third bullet point on page 2-7 in Section 2.0 *Project Description* has been revised as follows:

- At the intersection of Harris Grade Road and Purisima Road: An Americans with Disability Act (ADA) compliant pedestrian ramps would be added. Also, an existing grated inlet with a curb opening catch basin would be replaced.

- ❖ (Comment 12.6) The last paragraph on page 2-7 in Section 2.0 *Project Description* has been revised as follows:

Initial subdivision improvements, including the construction of roadways, utility infrastructure and drainage improvements would be constructed in a single phase upon approval of the project. No import or export of soils is ~~required~~ proposed. The development of residences would proceed based upon market demand.



## Revisions to Section 4.2 Air Quality

- ❖ *(Comment 2.1)* Table 4.2-5 on page 4.2-11 in Section 4.2 *Air Quality* has been revised as follows:

**Table 4.2-5  
Operational Emissions for the Proposed Project**

Source	Maximum Emissions (lbs/day)		
	ROG	NO <sub>x</sub>	PM <sub>10</sub>
Area Source	12.97	0.04	0.02
Energy	0.05	0.43	0.03
Mobile	2.35	4.35	3.99
<b>Total</b>	<b>15.37</b>	<b>4.82</b>	<b>4.04</b>
<i>Threshold (area + energy + mobile)</i>	<del>55</del> 240	<del>55</del> 240	80
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Threshold (mobile only)</i>	25	25	n/a
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>

*Source: CalEEMod v.2011.1, modeling results contained in Appendix B.*

*\*indicates exceedance of a threshold*

- ❖ *(Comment 2.3)* The first paragraph on page 4.2-11 in Section 4.2 *Air Quality* has been revised as follows:

Project construction emissions would not exceed the 25-tons-per-year threshold under SBCAPCD Rule 202.F.3. The proposed project would be required to incorporate construction emissions and dust control measures. In addition, all portable diesel fired engines rated at 50 brake-horsepower or greater will be required to have either a Portable Equipment Registration Program certification or an APCD permit prior to operation, which will further minimize diesel rated emissions. All paving activities will be required to comply with Rule 329, which limits the Volatile Organic Compound (VOC) mixtures in paving materials. These requirements would further ensure that construction-related air quality impacts would be less than significant.

- ❖ *(Comment 2.4)* The last paragraph on page 4.2-11 in Section 4.2 *Air Quality* has been revised as follows:

As shown in Table 4.2-5, the project would generate an estimated 15.37 pounds of ROG, 4.82 pounds of NO<sub>x</sub>, and 4.04 pounds of PM<sub>10</sub> per day. No SBCAPCD thresholds would be exceeded; therefore, impacts would be less than significant. In addition, any boilers or water heating units rated between 75,000 and 2.0 million Btu/hr would be required to comply with Rule 360, which would further ensure that project emissions would be less than significant.





## Revisions to Section 4.4 Cultural Resources

- ❖ *Comment 7.1)* The following paragraph was added to page 4.4–9 of Section 4.4 Cultural Resources:

Extended Phase I Archeological Survey. At the request of the Santa Ynez Band of Chumash Indians during the SB 18 consultation process, an extended Phase I Archeological Survey was performed in February 2013 by Dudek. The Phase I Archeological Investigation was undertaken to determine the presence or absence of potentially significant subsurface prehistoric archaeological materials within the proposed project area. On February 12 and 13, 2013, 16 backhoe excavations were performed and systematically distributed throughout the 10.05– acre project area. The excavations did not identify any potential subsurface prehistoric archaeological materials within the proposed project area. All excavations were monitored by Amado Romero of the Santa Ynez Band of Mission Indians.

- ❖ Beginning on page 4.4–10, Impact CR–1 in Section 4.4 *Cultural Resources* has been revised as follows:

**Impact CR–1**      **No known archaeological resources have been identified on the project site and the presence of unknown archeological resources is unlikely. However, if during excavation archeological resources or human remains are unearthed, potentially significant impacts could occur. ~~implementation of the proposed project could adversely affect previously unidentified archaeological resources and/or human remains.~~ Impacts would be Class II, *significant but mitigable.***

The project site is identified by the Lompoc General Plan as having a “high sensitivity zone” archaeological potential (as identified in Figure 4.4–1). A Phase I Cultural Resource Survey was prepared for the project site by Rincon Consultants in August, 2012. The *Phase I Cultural Resources Survey* concluded that no cultural resources are known to occur within the project area and no resources were identified adjacent to the project area that could be indirectly impacted. The CCIC records search did not identify any previously recorded archaeological sites but did identify one previously recorded isolated find within 0.5 mile of the project area. Moreover, the project site has been previously disturbed due to past agricultural activities and is unlikely to contain any shallow, subsurface artifacts. The extended Phase I Archeological Survey Report performed 16 excavations on the project site and found no evidence of subsurface archeological resources (Dudek, 2013). However, the proposed project would require excavation of soils up to approximately ten feet below the ground surface to construct the proposed detention basin near the southwestern portion of the site. Although such



an event is unlikely based on the findings of the two Phase I reports prepared for the project site, This excavation could potentially unearth previously unidentified cultural resources. Therefore, encountering archaeological or paleontological resources, and/or human remains is possible. Impacts would be potentially significant.

**Mitigation Measures.** The following mitigation measures are required to avoid potential impacts to as yet undiscovered cultural resources (archaeological) and/or human remains that could be present on the project site.

~~CR-1(a) — **Archaeological Monitoring of Construction Activities.** Archaeological monitoring of project related ground disturbing activities shall be undertaken. In the event that cultural resources are exposed during project activities, the monitor shall be empowered to temporarily halt construction until the resource can be evaluated. At the conclusion of archaeological monitoring, a monitoring report summarizing the efforts and results shall be prepared and submitted to the City of Lompoc.~~

~~CR-1(b) — **Native American Monitoring of Construction Activities.** Native American monitoring of project related ground disturbing activities shall be undertaken. A local Chumash group, such as the Santa Ynez Band of Chumash Indians, shall be retained to conduct Native American monitoring during construction.~~

~~CR-1(εa) **Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground disturbing activities, work in the immediate area shall halt and an archaeologist meeting the Secretary of the Interior's *Professional Qualifications Standards* for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing and/or construction activities associated with the proposed project, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a City-qualified archaeologist. An appropriate plan for the preservation of the artifacts from the site shall be prepared, and implementation of the plan shall be overseen by a City-qualified archaeologist prior to commencement of ground disturbing activities. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2.~~

~~CR-1(db) **Unanticipated Discovery of Human Remains.** If human remains are discovered during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human~~



~~remains, the Santa Barbara County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. In the event that unknown human remains are encountered during grading, clearing, grubbing and/or construction activities associated with the proposed project, all excavation and ground disturbing work on or adjacent to the project site (or area of discovery) shall be stopped immediately in the vicinity. The Santa Barbara County Coroner shall be contacted and the Native American Heritage Commission shall be notified immediately. No further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The site shall be evaluated by the most likely Chumash descendant identified by the Native American Heritage Commission and a City-qualified archaeologist.~~

**Significance After Mitigation.** With implementation of the above mitigation measures, potential impacts to undiscovered cultural resources and /or human remains would be reduced to a less than significant level.

**c. Cumulative Impacts.** Cumulative development within the City of Lompoc includes the addition of 583 residential units, 288,632 square feet of commercial space, and 130,265 square feet of institutional space. The proposed project, in conjunction with other planned and pending development in Lompoc, ~~would~~ may cumulatively increase the potential for cultural resources to be altered or damaged. However, the project's contribution to cumulative impacts would be less than significant after implementation of Mitigation Measures CR-1(a-b). In addition, ~~B~~ because the potential to create adverse impacts to such resources depends on the nature of each proposed project, including its specific site and surroundings, cultural resource issues must be addressed on a case-by-case basis. The requirements placed on all new developments as described in Section 4.4.1(f) of this EIR section, including any recommendations in site-specific cultural resource studies, would reduce cumulative impacts to a less than significant level.

- ❖ *(Comment 10.5)* The following information has been added to the fifth paragraph on page 4.4-9 in Section 4.4 *Cultural Resources*:

Rincon archaeologists conducted a cultural resources survey of the project area on August 21, 2012. The project area was surveyed using transects oriented north-south and spaced no greater than 10 meters apart. All exposed ground surface was examined for artifacts: (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock [FAR]), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of



the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were visually inspected. Ground visibility during survey was somewhat poor (roughly 30%) due to the presence of planted hay and wild vegetation. No cultural resources (archaeological or historic built environment) were observed within the project area.

- ❖ *(Comment 10.6)* The first two sentences of the first paragraph on page 4.4–9 in Section 4.4 Cultural Resources have been revised as follows:

The project site is identified by the Lompoc General Plan as ~~having~~ a “high sensitivity zone” ~~archaeological potential~~ (as identified in Figure 4.4–1). A Phase I Cultural Resource Survey was prepared for the project site by Rincon Consultants in August, 2012. The Phase I Cultural Resources Survey concluded that no cultural resources are known to occur within the project area and no resources were identified adjacent to the project area that could be indirectly impacted.

- ❖ *(Response 10.10)* The cumulative impact analysis on page 4.4–11 in Section 4.4 *Cultural Resources* has been modified as follows:

Cumulative development within the City of Lompoc per the Current Project List dated 2012 includes the addition of 583 residential units, 288,632 square feet of commercial space, and 130,265 square feet of institutional space. The proposed project, in conjunction with other planned and pending development in Lompoc, ~~would~~ may cumulatively increase the potential for cultural resources to be altered or damaged. However, the project’s contribution to cumulative impacts would be less than significant after implementation of Mitigation Measures CR–1(a–d). In addition, ~~because~~ the potential to create adverse impacts to such resources depends on the nature of each proposed project, including its specific site and surroundings, cultural resource issues must be addressed on a case-by-case basis. The requirements placed on all new developments as described in Section 4.4.1(f) of this EIR section, including any recommendations in site-specific cultural resource studies, would reduce cumulative impacts to a less than significant level.

## Revisions to Section 4.6 Greenhouse Gases

- ❖ *(Comment 3.3)* The third paragraph beginning on page 4.6–10 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). As neither the City nor the SBCAPCD has developed



or adopted permanent GHG significance thresholds, this analysis is based on the County of Santa Barbara’s interim approach to evaluating GHG emissions. The County’s methodology to address climate change in CEQA documents is evolving. The County is currently working to develop an inventory of GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data. Currently, Santa Barbara County recommends use of San Luis Obispo Air Pollution Control District (SLOAPCD) Greenhouse Gas Thresholds, as adopted in April 2012.

Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County recommends an interim approach to evaluating GHG emissions (Appendix B). This interim approach is SLOAPCD greenhouse gas thresholds are summarized in Table 4.6-1.

**Table 4.6-1  
 County of Santa Barbara GHG Significance Determination Guidelines**

<b>GHG Emission Source Category</b>	<b>Operational Emissions</b>
Non-stationary Sources	1,100 MT of CO <sub>2</sub> e/year OR 4.6 MT CO <sub>2</sub> e/SP/year (residents + employees)
Stationary Sources	10,000 MT/year
Plans	6.6 MT CO <sub>2</sub> e/SP/year (residents + employees)

Notes: SP = Service Population.

*Project emissions can be expressed on a per-capita basis as Metric tons of CO<sub>2</sub>e/Service Population/year, which represents the project’s total estimated annual GHG emissions divided by the estimated total number of new residents and employees that would result from development of a project.*

*Neither BAAQMD nor Santa Barbara County includes any standards for construction-related emissions:*

*<http://www.sbcapcd.org/apcd/ceqa-ghg-faq.pdf>*

**Table 4.6-1  
 GHG Significance Determination Criteria**

<b>GHG Emission Source Category</b>	<b>Operational Emissions</b>
Residential and Commercial Projects	<u>Compliance with Qualified GHG Reduction Strategy</u> OR <u>Bright-Line Threshold of 1,150 MT of CO<sub>2</sub>e/yr</u> OR <u>Efficiency Threshold of 4.9 MT CO<sub>2</sub>e/SP*/yr</u>
(Industrial) Stationary Sources	<u>10,000 MT of CO<sub>2</sub>e/yr</u>

*\*SP = Service Population (residents + employees)*

*For projects other than stationary sources, compliance with either a Qualified Greenhouse Gas Reduction Strategy, or with the Bright-Line (1,150 CO<sub>2</sub>e/ yr.) or Efficiency Threshold (4.9 MT CO<sub>2</sub>e/SP/yr.) would result in an insignificant determination, and in compliance with the goals of AB 32. The construction emissions of projects will be amortized over the life of a project and added to the operational emissions. Emissions from construction-only projects (e.g. roadways, pipelines, etc.) will be amortized over the life of the project and compared to an adopted GHG Reduction Strategy or the Bright-Line Threshold only.*



The County's per-service population guideline is intended to avoid penalizing large projects that incorporate GHG-reduction measures such that they may have high total annual GHG emissions, but would be relatively efficient, as compared to projects of similar scale. However, this guideline is most appropriately used for large scale residential or commercial projects which would generate a large service population (defined as the sum of new residents and new employees that would result from a project). The proposed project is a relatively small residential development (44 units). As such, the ~~1,100~~ 1,150 metric tons of CO<sub>2</sub>E/year threshold is most applicable to the proposed project. Therefore, the proposed project would have a potentially significant contribution to GHG emissions if it would result in greater than ~~1,100~~ 1,150 metric tons of CO<sub>2</sub>E/year (MT CO<sub>2</sub>E/year).

- ❖ Impact statement GHG-1 on page 4.6-13 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

**Impact GHG-1     The project would generate short-term as well as long-term GHG emissions. These emissions would incrementally contribute to climate change. However, project emissions would not exceed the ~~1,100~~ 1,150 MT CO<sub>2</sub>E/year threshold. Impacts would be Class III, *less than significant*.**

- ❖ The second paragraph on page 4.6-15 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

As indicated in Table 4.6-5, CO<sub>2</sub>E emissions associated with the proposed project would not exceed the ~~1,100~~ 1,150 metric tons CO<sub>2</sub>E/year threshold of significance for non-stationary sources. Therefore, impacts would be less than significant.

- ❖ The last paragraph on page 4.6-22 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

As indicated in Table 4.6-6 and Table 4.6-7, the proposed project would be consistent with CAT strategies and the 2008 Attorney General Greenhouse Gas Reduction Measures. In addition, as indicated in Table 4.6-5, the increase of GHG emissions associated with the project would be approximately 725 metric tons CO<sub>2</sub>E per year, which would not exceed Santa Barbara County's interim significance determination guideline of ~~1,100~~ 1,150 metric tons CO<sub>2</sub>E per year for non-stationary sources of GHGs. Therefore, GHG emissions from the proposed project would not be cumulatively considerable.



## Revisions to Section 4.8 Land Use

- ❖ *(Comment 1.1)* The first paragraph on page 4.8-1 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

The City of Lompoc has an incorporated area of approximately 12 square miles and is. ~~The City of Lompoc is located in the western portion of Santa Barbara County, and is the nearest cities include Mission Hills, and Vandenberg Village are the nearest unincorporated communities.~~ Buellton, and Solvang are the nearest incorporated cities. The City's urban development is clustered in a core area surrounded by rural open areas and agriculture. The predominant land use in the City is residential, though the City includes a variety of commercial, industrial, and institutional land uses.

- ❖ *(Comment 1.2)* The third paragraph on page 4.8-1 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

Land uses that surround the project site include a church to the north and residential land uses to the south (in the City of Lompoc) and east (in the unincorporated Santa Barbara County community of Mesa Oaks). In addition, ~~there is a~~ the vacant lot to the west of the project site is within the City and; ~~however, the lot~~ has been approved for the development of 476 homes (Burton Ranch Project). Harris Grade Road defines the western boundary of the project site, while Purisima Road defines the southern boundary of the project site.

- ❖ *(Comment 1.3)* The commenter suggests including a discussion of the City of Lompoc and Mission Hills Community Service District "overlap agreement". In response to this comment, the follow information has been added on page 4.8-4 in Section 4.8 *Land Use and Policy Consistency*:

### Overlap Agreement between City of Lompoc and Mission Hills CSD

The area north of the City of Lompoc adjacent to Harris Grade Road is known to as the "Wye" area. It was determined by both the City of Lompoc and Mission Hills CSD that properties in the "Wye" area can be within the jurisdiction of both agencies. The Mission Hills Community Services District (CSD) and City of Lompoc approved an "Annexation Agreement" in May 2000. The agreement stipulated that Mission Hills CSD will provide water and sewer services and the City will provide other local services, such as police and fire protection in this area. Those who live in the homes that will be built in the overlap area will be residents of both the City of Lompoc and the Mission Hills CSD.

- ❖ *(Comment 8.1)* Table 4.8-1 *General Plan Policy Consistency* on page 4.8-16 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:



<i>Public Services Element</i>	
<b>Policy 1.2.</b> The City shall assure that sufficient capacity is available in the electrical system prior to approval of new development projects.	<del>Potentially Consistent.</del> As discussed in Section 4.10, <i>Public Services and Utilities</i> , Pacific Gas & Electric and Southern California Gas Company, and <del>AT&amp;T</del> Verizon telephone company have adequate capacity to provide electricity and gas to the proposed project site. Impacts are Class III, <i>less than significant</i> .

- ❖ *(Comment 8.2)* Table 4.8-1 *General Plan Policy Consistency* on page 4.8-24 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

<i>Housing Element</i>	
<b>Policy 1.11.</b> With the exception of areas within the Old Town Redevelopment Project, Amendment No. 2 area, in all residential developments of ten units or more, at least 10% of all the units shall be affordable to target income groups. As an alternative to providing affordable housing on-site, the inclusionary requirement may be satisfied through other equivalent measures (e.g., production based on units of like size relative to numbers of bedrooms and bathrooms) including off-site construction, acquisition of affordability covenants on existing dwelling units, donation of land or payment of in-lieu fees. In accordance with State law, residential development projects within the Old Town Redevelopment Project, Amendment No. 2 area shall provide 15% of new housing affordable to low- and moderate-income households with at least 40% of those units to be used by very low-income households.	<del>Potentially Inconsistent.</del> <b>Consistent.</b> The proposed project is the development of 44 single family residential units. These units may not be considered affordable to moderate income target groups. <u>However, the project applicant could choose to pay the adopted in-lieu fees in accordance with the City's fee program for affordable housing to offset the provision of affordable housing units or construct the inclusionary housing units.</u>

- ❖ The first paragraph on page 4.8-26 in Section 4.8 *Land Use and Policy Consistency* the following has been revised.

As shown in Table 4.8-1, the proposed project would be generally consistent with the goals and policies of the City's General Plan, including but not limited to goals and policies related to economic development, conservation of resources and open space, air quality, the transportation and circulation system, and land use. ~~However, the project would not be consistent with inclusionary housing goals. No physical impacts to the environment would occur as a result of this inconsistency.~~ Ultimately, the determination for consistency is at the discretion of the City Council.





**Significance After Mitigation.** The proposed project is an allowed use under the Lompoc General Plan and Municipal Code. As shown in Table 4.8-1, the project would generally be consistent with adopted policies with incorporation of mitigation measures included in this EIR, ~~with the exception of inclusionary housing policies. However, no physical impacts to the environment would occur as a result of this inconsistency. In addition, the determination for consistency is at the discretion of the City Council.~~ Therefore, impacts would be less than significant without additional mitigation.

## Revisions to Section 4.10 Public Services and Utilities

- ❖ *(Comment 1.4)* The following information has been added to the first paragraph on page 4.10-1 in Section 4.10 *Public Services*:

Fire protection and emergency medical services in the City of Lompoc are provided by the Lompoc Fire Department. The Department operates two (2) fire stations with eight (8) budgeted firefighters and a minimum staffing of seven (7) firefighters on duty between the two (2) stations. Station #1, which is also the administrative headquarters, is located at 115 South G Street and houses three (3) engines. Station #1 is located 2.8 miles from the project site. Station #2 is located at 1100 North D Street and houses two (2) engines. Station #2 is located 1.8 miles from the project site. Figure 4.10-1 shows the locations of the fire stations within Lompoc. The entire Department's staffing consists of twenty-four (24) personnel (Personal Communication, Chief Stan Hart, Lompoc Fire Department, 2012).

- ❖ *(Comment 4.1)* The second paragraph on page 4.10-1 in Section 4.10 *Public Services* has been revised as follows:

The Santa Barbara County Fire Department has a fire station at 3510 Harris Grade Road, approximately ~~two~~ one miles north of the project site.

- ❖ *(Comment 12.9)* The second paragraph in Section 4.10 *Public Services and Utilities* has been revised as follows:

**f. Water Supply.** The Mission Hills Community Services District (MHCS D) would provide water services to the project. ~~The project site is within the MHCS D sphere of influence, though it is not currently within the MHCS D service area.~~

- ❖ *(Comment 12.1)* The paragraphs on page 4.10-10 in Section 4.10 *Public Services and Utilities* have been revised as follows:

~~Pacific Gas & Electric (PG&E) provides electrical service throughout central and northern California. PG&E utilizes a variety of energy sources to generate electricity, including natural gas, nuclear energy, renewable energy, and hydroelectric plants. PG&E maintains a large network of transmission and distribution infrastructure throughout the area in~~



~~order to provide electrical power and service to its customers. On an average day, PG&E provides power and natural gas to approximately 15 million people in a 70,000 square-mile service (Pacific Gas & Electric, August 2012). In 2010, 71% of California's electricity supply came from within the state, while 21% came from the Southwest and 8% came from the Pacific Northwest (California Energy Commission, August 2012). Currently, there is no electricity demand from the project site.~~

The City of Lompoc owns its electrical utility. The City of Lompoc would provide electricity to the proposed project site. Lompoc Electric provides standard electrical service to residential, commercial and industrial land uses within the City. The electricity is comprised of multiple sources, including renewable sources. Lompoc Electric is close to meeting the renewable energy goal set by Governor Arnold Schwarzenegger of 33 percent by the year 2020. The City's portfolio includes approximately 31 percent renewable energy. The City of Lompoc has achieved this goal by signing a long-term contract to purchase a larger amount of geothermal-generated energy, which is primarily produced at plants in Lake County, California. In addition, the City also purchases energy generated by a dam on the Stanislaus River. As a member of the Northern California Power Agency (NCPA), the City of Lompoc owns a portion of both the Lake County plants and the dam on the Stanislaus River.

Telephone service in the City of Lompoc is provided by numerous providers, including ~~AT&T~~ Verizon and Comcast. As public utilities, ~~SCGC, PG&E,~~ and telecommunications providers are under the jurisdiction of the California Public Utilities Commission. According to California Public Utilities Code Section 451, public utilities have an obligation to serve the public and are required by law to “furnish and maintain...service as necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” As a result, utility providers are required by law to provide service to any member of the public living within the utility's service area who has applied for service and is willing to pay for the service and comply with the utility's rules and regulations.

Impact statement PSU-9 10 in Section 4.10 *Public Services and Utilities* has been revised as follows:

**Impact PSU-9**      **The proposed project would require electricity, telephone, and gas service. ~~Pacific Gas & Electric~~ City of Lompoc Electric, Southern California Gas Company, and ~~AT&T~~ Verizon telephone company have adequate capacity to provide electricity, phone, and gas to the proposed project site. Therefore, impacts would be Class III, *less than significant*.**

The proposed project would include 44 residential units. Based on the average household natural gas consumption rate of 5,338 cubic feet per month, the proposed



44 residential units are projected to demand approximately ~~832,728~~ 234,872 cubic feet per month, or ~~234,872~~ 2,818,464 cubic feet per year of natural gas. In addition, based on the average household electrical consumption factor of 5626.5 kilowatt hours (kWh) per residential dwelling unit per year, ~~156~~ 44 residential units would demand approximately 247,556 kWh or 0.25 megawatt hours (MWh) per year.

Although the proposed project would create additional demands on natural gas, telephone, and electricity supplies and distribution infrastructure, these demands would be within the service capabilities of ~~AT&T Verizon~~ (AT&T, 2012 Verizon, 2013), Southern California Gas (Spencer, 2012) and City of Lompoc Electric (Fabing, Lompoc Utility Department, 2012). ~~PG&E (Zinakorjian, 2012)~~. As such, the project would not require major new sources of natural gas or electricity such that new or expanded gas or electricity power plants would be required. Natural gas distribution pipelines required to serve the project would need to be installed on-site. The installation of these pipelines would be the responsibility of the applicant. Similarly, electrical infrastructure would need to be installed on-site to serve the project. The installation of this infrastructure would be the responsibility of the applicant. These on-site utilities would be constructed as a part of the proposed project. The environmental impacts of the proposed project are discussed throughout this EIR. Therefore, the proposed project would have less than significant impacts on natural gas, telephone and electricity supply and infrastructure.



### 3.0 WRITTEN COMMENTS and RESPONSES on the DRAFT EIR

Each written comment regarding the Draft EIR that the City of Lompoc received is included in this section (refer to table below). Responses to these comments have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the DEIR addresses pertinent environmental issues. The comment letters have been numbered sequentially, and each issue within a comment letter, if more than one, has a number assigned to it. Each comment letter is reproduced in its entirety with the issues of concern numbered in the margin. References to the responses to comments identify the specific comment (6.2, for example, would reference the second issue of concern within the sixth sequential comment letter).

**Comment Letters Received on the Draft EIR**

Letter #	Commenter	Organization	Date
1	Bob Braitman, Executive Officer	Santa Barbara Local Agency Formation Commission	January 15, 2013
2	Carly Wilburton, Air Quality Specialist	Santa Barbara County Air Pollution Control District (SBCAPCD), Technology and Environmental Assessment Division	January 8, 2013
3	Glen S. Russell PhD Director	County of Santa Barbara Planning and Development	January 24, 2013
4	Eric Peterson, Fire Marshal	Santa Barbara County Fire Department	January 16, 2013
5	Mark Luehrs, Development Review Engineer	Santa Barbara County Flood Control & Water Conservation District	January 18, 2013
6	Bret A. Stewart, P.E., Senior Development Engineer Manager	County of Santa Barbara Public Works Department	January 23, 2013
7	Joe Talaugon, Chairman SYBCI Elders Council	SYBCI Elders Council-Chumash	January 28, 2013
8	Kenneth E. Marshall, AICP Principal	Dudek	January 25, 2013
9	David Compton, Biologist	Dudek	January 17, 2013
10	David Stone, RPA Cultural Resources Manager	Dudek	January 25, 2013
11	Lane's End Homeowners	Private citizens of the Lane's End Homeowners	January 26, 2013
12	Jeremy Salts, PE Principal Engineer	Penfield & Smith	January 24, 2013
13	Dave Singleton	Native American Heritage Commission	December 18, 2012



**Santa Barbara Local Agency Formation Commission**  
105 East Anapamu Street ♦ Santa Barbara CA 93101  
805/568-3391 ♦ FAX 805/647-7647  
www.sblafco.org ♦ lafco@sblafco.org

January 15, 2013

Lucille T. Breeze, AICP  
Planning Manager  
City of Lompoc  
P.O. Box 8001  
Lompoc, CA 93436



### Summit View Homes Draft EIR (EIR 12.01)

Dear Lucille:

We have reviewed the Draft EIR for the Summit View Homes project. The site is immediately adjacent to the City sphere of influence and City boundaries on both the western and southern sides. Our review is in the Commission’s role as a responsible agency with respect to potential changes in the City Sphere of Influence and boundaries.

Please note the error on page 4.8.1 which states “. . . the nearest cities include Mission Hills, Vandenberg Village, Buellton and Solvang.” Neither Mission Hills nor Vandenberg Village are incorporated cities. A more accurate statement would be:

The City of Lompoc has an incorporated area of approximately 12 square miles. ~~The City of Lompoc is~~ located in the western portion of Santa Barbara County. ~~and is the nearest cities include~~ Mission Hills and, Vandenberg Village are nearby unincorporated communities. The nearest other incorporated cities are, Buellton, and Solvang. The City’s urban development is clustered in a core area surrounded by rural open areas and agriculture. The predominant land use in the City is residential, though the City includes a variety of commercial, industrial, and institutional land uses

1.1

On the same page the description of surrounding land uses should note the Burton Ranch Project is within the City boundaries, perhaps as follows.

1.2

In addition, ~~there is a~~ the vacant area lot to the west of the project site is within the City and ~~however, the lot~~ has been approved for the development of 476 homes (Burton Ranch Project).

We suggest the EIR reference the “overlap agreement” by the City of Lompoc and Mission Hills Community Services District in which both public agencies have consented to having their boundaries overlap for areas which are to receive sewer services from the District and other local municipal services from the City.

1.3

Lucille Breeze  
January 15, 2013  
Page 2

With regard to fire protection services (pg. 4-10-1) the EIR discusses the ratio of City firefighters to the City population. Since an issue may be raised as to whether it would be preferable to have the County Fire Protection District serve this area, are similar statistics available for the ratio of County Fire District firefighters to the unincorporated population in the Lompoc area?

1.4

The EIR notes the County fire station on Harris Grade Road is approximately two miles north of the project site. While it notes the locations of the two City fire stations it does not provide an estimate of the mileage from the nearest City station to the project site and this should be added.

We have no other comments regarding the Draft EIR. Please let me know if you have questions or would like to discuss this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Braitman", followed by a horizontal line extending to the right.

BOB BRAITMAN  
Executive Officer

*Letter 1*

**COMMENTER:** Bob Braitman, Executive Officer, Santa Barbara Local Agency Formation Commission

**DATE:** January 15, 2013

**RESPONSE:**

Response 1.1

The first paragraph on page 4.8-1 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

The City of Lompoc has an incorporated area of approximately 12 square miles and is. ~~The City of Lompoc is located in the western portion of Santa Barbara County, and is the nearest cities include Mission Hills, and Vandenberg Village are the nearest unincorporated communities,~~ Buellton, and Solvang are the nearest incorporated cities. The City's urban development is clustered in a core area surrounded by rural open areas and agriculture. The predominant land use in the City is residential, though the City includes a variety of commercial, industrial, and institutional land uses.

Response 1.2

The third paragraph on page 4.8-1 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

Land uses that surround the project site include a church to the north and residential land uses to the south (in the City of Lompoc) and east (in the unincorporated Santa Barbara County community of Mesa Oaks). In addition, ~~there is a~~ the vacant lot to the west of the project site is within the City and; ~~however, the lot~~ has been approved for the development of 476 homes (Burton Ranch Project). Harris Grade Road defines the western boundary of the project site, while Purisima Road defines the southern boundary of the project site.

Response 1.3

The commenter suggests including a discussion of the City of Lompoc and Mission Hills Community Service District "overlap agreement". In response to this comment, the follow information has been added on page 4.8-4 in Section 4.8 *Land Use and Policy Consistency*.



Overlap Agreement between City of Lompoc and Mission Hills CSD

The area north of the City of Lompoc adjacent to Harris Grade Road is known to as the “Wye” area. It was determined by both the City of Lompoc and Mission Hills CSD that properties in the “Wye” area can be within the jurisdiction of both agencies. The Mission Hills Community Services District (CSD) and City of Lompoc approved an “Annexation Agreement” in May 2000. The agreement stipulated that Mission Hills CSD will provide water and sewer services and the City will provide other local services, such as police and fire protection in this area. Those who live in the homes that will be built in the overlap area will be residents of both the City of Lompoc and the Mission Hills CSD.

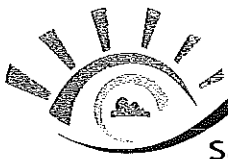
Response 1.4

The commenter notes that the EIR discusses the ratio of City firefighters to City population and does not discuss the same ratio for County fire protection, and that the EIR does not state the distance from the fire stations to the project site. The project site would be served by the City of Lompoc Fire Department and therefore information pertains specifically to Lompoc fire protection services. As discussed in Section 4.10 *Public Services*, the Lompoc Fire Department would be able to adequately serve the project site. In response to the comment regarding distance from the fire stations to the project site, the following information has been added to the first paragraph on page 4.10–1 in Section 4.10 *Public Services*:

Fire protection and emergency medical services in the City of Lompoc are provided by the Lompoc Fire Department. The Department operates two (2) fire stations with eight (8) budgeted firefighters and a minimum staffing of seven (7) firefighters on duty between the two (2) stations. Station #1, which is also the administrative headquarters, is located at 115 South G Street and houses three (3) engines. Station #1 is located 2.8 miles from the project site. Station #2 is located at 1100 North D Street and houses two (2) engines. Station #2 is located 1.8 miles from the project site. Figure 4.10–1 shows the locations of the fire stations within Lompoc. The entire Department’s staffing consists of twenty-four (24) personnel (Personal Communication, Chief Stan Hart, Lompoc Fire Department, 2012).







**Santa Barbara County  
Air Pollution Control District**

January 8, 2013

Letter 2

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

**Re: APCD Comments on the Draft Environmental Impact Report for the Summit View Homes Project, EIR 12-01, SCH No. 2012071088**

Dear Ms. Breese:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Summit View Homes project .The applicant proposes a residential subdivision consisting of 44 single family residential lots and three open space lots on a vacant 10-acre site, zoned DR 4.6 (Design Residential), and located at the northeast corner of Harris Grade Road and Purisima Road. The applicant is requesting annexation of the site into the City of Lompoc. Currently, the site is located in an unincorporated area of Santa Barbara County on a parcel continuous to the Urban Limit Line Sphere of Influence of the City of Lompoc.

2.1

Air Pollution Control District staff offers the following comment on the DEIR:

1. **Section 4.2 Air Quality, Table 4.2-5, Page 4.2-11:** The row labeled "*Threshold (area + energy + mobile)*" in Table 4.3-5 sites a threshold of 55 lbs/day for ROG and NO<sub>x</sub>, however APCD's Board adopted threshold for ROG and NO<sub>x</sub> is 240 lbs/day. Please correct the table accordingly.

APCD staff offers the following suggested conditions:

1. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at [www.sbcapcd.org/rules/download/rule345.pdf](http://www.sbcapcd.org/rules/download/rule345.pdf).
2. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
3. Small boilers and water heating units (rated between 75,000 and 2.0 million Btu/hr) must comply with the emission limits and certification requirements of APCD Rule 360. Combinations of units totaling 2.0 million Btu/hr or greater are required to obtain a District permit prior to installation. Please see [www.sbcapcd.org/eng/boiler/rule360/rule\\_360.htm](http://www.sbcapcd.org/eng/boiler/rule360/rule_360.htm) for more information and a list of certified boilers (note: any units fired on fuel(s) other than natural gas

2.2

2.3

2.4

must be certified by the SBCAPCD on a case-by-case basis, even if the unit is certified when fired on natural gas).

4. At a minimum, prior to occupancy any feasible greenhouse gas reduction measures from the following sector-based list should be applied to the project:
- Energy use (energy efficiency, low carbon fuels, renewable energy)
  - Transportation (reduce vehicle miles traveled, compact and transit-oriented development, pedestrian- and bicycle-friendly communities)
  - Water conservation (improved practices and equipment, landscaping)
  - Waste reduction (material re-use/recycling, composting, waste diversion, waste minimization)
  - Architectural features (green building practices, cool roofs)

2.5

5. Asphalt paving activities shall comply with APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

2.6

If you or the project applicant have any questions regarding these comments, please feel free to contact me at 961-8890 or by e-mail at [cvw@sbcapcd.org](mailto:cvw@sbcapcd.org) if you have questions.

Sincerely,



Carly Wilburton  
Air Quality Specialist  
Technology and Environmental Assessment Division

cc: Richard Daulton  
Project File  
TEA Chron File

**Letter 2**

**COMMENTER:** Carly Wilburton, Air Quality Specialist, Santa Barbara County Air Pollution Control District (SBCAPCD)

**DATE:** January 8, 2013

**RESPONSE:**

Response 2.1

The commenter accurately summarizes the project and notes a discrepancy in Table 4.2–5. In response to this comment, Table 4.2–5 on page 4.2–11 in Section 4.2 *Air Quality* has been revised as follows:

**Table 4.2–5  
Operational Emissions for the Proposed Project**

Source	Maximum Emissions (lbs/day)		
	ROG	NO <sub>x</sub>	PM <sub>10</sub>
Area Source	12.97	0.04	0.02
Energy	0.05	0.43	0.03
Mobile	2.35	4.35	3.99
<b>Total</b>	<b>15.37</b>	<b>4.82</b>	<b>4.04</b>
<i>Threshold (area + energy + mobile)</i>	<del>55</del> 240	<del>55</del> 240	80
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>
<i>Threshold (mobile only)</i>	25	25	n/a
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>

*Source: CalEEMod v.2011.1, modeling results contained in Appendix B.  
\*indicates exceedance of a threshold*

Response 2.2

The commenter suggests the use of dust control measures for construction activities pursuant to Rule 345. As discussed in Impact AQ–1 in Section 4.2 *Air Quality*, the project would implement all applicable dust control measures. The measures would be printed on all grading and building plans.

Response 2.3

The commenter notes that diesel powered construction equipment 50 brake-horsepower or greater require PERP certificates or APCD permits. Construction equipment would comply with existing regulations and permits as applicable. In response to this comment, the first paragraph on page 4.2–11 in Section 4.2 *Air Quality* has been revised as follows:



Project construction emissions would not exceed the 25-tons-per-year threshold under SBCAPCD Rule 202.F.3. The proposed project would be required to incorporate construction emissions and dust control measures. In addition, all portable diesel fired engines rated at 50 brake-horsepower or greater will be required to have either a Portable Equipment Registration Program certification or an APCD permit prior to operation, which will further minimize diesel rated emissions. All paving activities will be required to comply with Rule 329, which limits the Volatile Organic Compound (VOC) mixtures in paving materials. These requirements would further ensure that construction-related air quality impacts would be less than significant.

#### Response 2.4

The commenter notes that small boilers and water heating units rated between 75,000 and 2.0 million Btu/hr must comply with emissions limits and certification requirements of Rule 360. Any on-site boilers or water heating units associated with the project within the noted range would comply with Rule 360. In response to this comment, the last paragraph on page 4.2-11 in Section 4.2 Air Quality has been revised as follows:

As shown in Table 4.2-5, the project would generate an estimated 15.37 pounds of ROG, 4.82 pounds of NO<sub>x</sub>, and 4.04 pounds of PM<sub>10</sub> per day. No SBCAPCD thresholds would be exceeded; therefore, impacts would be less than significant. In addition, any boilers or water heating units rated between 75,000 and 2.0 million Btu/hr would be required to comply with Rule 360, which would further ensure that project emissions would be less than significant.

#### Response 2.5

The commenter suggests various greenhouse gas reduction measures. As discussed in Section 4.6 *Greenhouse Gas Emissions/Climate Change*, the proposed project would not exceed the 1,100 metric ton per year threshold and impacts would be less than significant. No mitigation is required. It should be noted that the project would be subject to the *California Green Building Standards Code*, which would ensure energy efficiency, water conservation and waste reduction. In addition, the project would include the construction of a bus stop along Harris Grade Road, immediately adjacent to the project site, which would encourage the use of alternative transportation.

#### Response 2.6

The commenter notes that paving activities are subject to Rule 329. All applicable project related paving activities would comply with Rule 329. See Response 2.3 above.





# County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director

Dianne Black, Assistant Director

January 24, 2013

Letter 3

Ms. Lucille T. Breese, AICP  
City of Lompoc  
Community Development Department  
100 Civic Center Plaza  
Lompoc, CA 93438

**RE: Comments on Draft Environmental Impact Report for the Summit View Homes Project**

Dear Ms. Breese:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Summit View Homes Project. The proposed project is located within the unincorporated County on parcel 097-250-034 and currently under the jurisdiction of Santa Barbara County. The parcel is zoned Designed Residential (DR 4.6 units/acre) and designated Residential under the Comprehensive Plan. It is our understanding that the City of Lompoc is considering annexation of the site into the City of Lompoc which would also require a Sphere of Influence adjustment. The City of Lompoc would also need to complete a General Plan Amendment, Rezone and approval of a tentative subdivision map to complete the project.

The project site is located at the northeast corner of the intersection of Harris Grade Road and Purisima Road. It is sited west of an existing single family residential development in the County, which is also zoned DR 4.6, and south of an existing church on property zoned DR 4.6. The project site is located within an existing Scenic Buffer Land Use Overlay under the County's Comprehensive Plan and adjacent to a proposed trail alignment (Park, Recreation, and Trails Map 5) on Harris Grade Road.

## **CEQA Comments**

### *General Comments*

As a responsible agency under the California Environmental Quality Act (CEQA) the County would like to advise the City that if the EIR is certified far in advance of the annexation and permitting of the development, the City may need to consider possible changes to the EIR under Section 15162 (Subsequent EIRs and Negative Declarations) of the CEQA Guidelines.

3.1

Additionally, the certification of the EIR in the absence of any pending applications with the City or the Santa Barbara County Local Agency Formation Commission (LAFCO) is premature. 3.1

*Aesthetics*

The project site is located within the Lompoc Valley Rural Region and contains an existing Scenic Buffer Overlay Designation along the perimeters of Harris Grade Road and Purisima Road under the County's Comprehensive Plan. The area acts as a scenic gateway into the Mission Hills area of the County. The designated scenic buffer on the parcel along with the DR 4.6 zoning act as tools to minimize aesthetic impacts. This is accomplished through "clustering" of the residential lots away from the main roads, such as Purisima Road and Harris Grade Road. This design is used in the residential development located immediately to the east of the project which incorporates the clustered design and setback from Purisima Road. The County encourages the City to incorporate similar features in the site design of the proposed project to achieve compatibility with existing developed neighborhoods and keep the aesthetic value of this important "gateway". If the project does not include these features, the DEIR should analyze the potential aesthetic degradation to the area. 3.2

*Greenhouse Gas Emissions*

The DEIR references County of Santa Barbara Greenhouse Gas (GHG) Significance Determination Guidance. However, the guidance referenced is out of date and no longer in use by the County. The guidance references the Bay Area Air Quality Management District's (BAAQMD) Thresholds (Thresholds) which have received a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD has complied with CEQA. The BAAQMD is no longer recommending that the Thresholds be used as a measure of a project's signification air quality impact. More information can be found on BAAQMD's website. 3.3

The County of Santa Barbara is now referring to the San Luis Obispo County Air Pollution Control District thresholds for GHG emissions as guidance for County of Santa Barbara projects. The City may want to consider an alternative approach given the writ of mandate which applies to the BAAQMD's thresholds.

*Transportation and Circulation*

Under the County's Comprehensive Plan there is a proposed trail alignment, as shown on the Park, Recreation, and Trails Map 5, located adjacent to the project site on Harris Grade Road. Should the site be annexed into the City, this potential trail corridor would no longer be in place. Unless the project includes the trail in the project description, the DEIR should analyze the loss of the proposed trail as a potential impact. 3.4

**Other Comments**

The following comments do not necessarily apply to the DEIR but are provided here as suggestions for the City to consider as the project moves forward.

*Pedestrian Access*

The County has reviewed the site design and encourages the City to incorporate pedestrian paths in the project site design to allow for connectivity to the main streets and existing pedestrian paths located in adjacent neighborhoods. Similar to the discussion in Aesthetics above, the DR zoning used by the County is a tool which provides for this kind of design which promotes pedestrian access and connectivity and is used in the residential development located directly east of the project site.

3.5

*Regional Housing Needs Allocation Transfer*

Government Code Section 65584.07 states "If an annexation of unincorporated land to a city occurs...a portion of the county's allocation [Regional Housing Needs Allocation] may be transferred to the city." The proposed project includes 44 new residences on approximately 10.05 acres of unincorporated land that would be annexed to the City of Lompoc. As a result, the county and city will need to reach an agreement on the number of residential units to be transferred from the county's RHNA allocation to the city's RHNA allocation. This step typically occurs when the county and city prepare the tax exchange agreement required by law as part of the annexation proceedings. In the most recent annexation involving a proposed residential development, the County and City of Santa Barbara agreed to transfer all (100%) of the potential residential units from the county's RHNA allocation to the city.

3.6

If you have any questions or comments regarding this letter, or would like to discuss these issues further, please call Heather Imgrund at (805) 884-6836.

Sincerely,



Glenn S. Russell, Ph.D.  
Director

**Letter 3**

**COMMENTER:** Glen S. Russell PhD, Director, County of Santa Barbara Planning and Development

**DATE:** January 24, 2013

**RESPONSE:**

Response 3.1

The commenter states that due to certification of the EIR for the proposed project in advance of annexation approval, the City may need to consider a subsequent EIR to reflect possible changes as a result of the annexation process. The comment is noted.

Response 3.2

The commenter recommends that the proposed project should include a buffer to minimize aesthetic impacts similar to the development to the east, a density no greater than the existing 4.6 units/acre, and that the EIR should analyze the potential aesthetic impacts to the area. The proposed project would have a density of 4.4 residential units/acre, which is slightly lower than existing County zoning density. The proposed residential structures would be set back approximately 25 feet from the property boundary and approximately 50 feet from the curb of Harris Grade Road and Purisima Road, which would limit visibility of the structures from these roadways. Impact AES-2 in Section 4.1 *Aesthetics* discusses aesthetic impacts to the character of the area. As discussed therein, these impacts are Class II, significant but mitigable. Mitigation measures include specific requirements for building design, building materials, landscaping and wall design to minimize aesthetic impacts. In addition, Section 6.0 *Alternatives*, analyzes an alternative with a 200 foot setback and increased density (Alternative 3), which can be considered by City decision makers prior to approval.

Response 3.3

The commenter notes that Santa Barbara County no longer recommends use of interim “Greenhouse Gas Significance Determination Guidance”. The County now recommends referencing San Luis Obispo Air Pollution Control District Greenhouse Gas Thresholds for all projects in Santa Barbara County. In response to this comment, the following portions of Section 4.6 *Greenhouse Gas Emissions/Climate Change* have been revised.

The third paragraph beginning on page 4.6-10 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:





For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). As neither the City nor the SBCAPCD has developed or adopted permanent GHG significance thresholds, this analysis is based on the County of Santa Barbara’s interim approach to evaluating GHG emissions. ~~The County’s methodology to address climate change in CEQA documents is evolving. The County is currently working to develop an inventory of GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data. Currently, Santa Barbara County recommends use of San Luis Obispo Air Pollution Control District (SLOAPCD) Greenhouse Gas Thresholds, as adopted in April 2012.~~

~~Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County recommends an interim approach to evaluating GHG emissions (Appendix B). This interim approach is SLOAPCD greenhouse gas thresholds are summarized in Table 4.6-1.~~

**Table 4.6-1  
 County of Santa Barbara GHG Significance Determination  
 Guidelines**

<b>GHG Emission Source Category</b>	<b>Operational Emissions</b>
<b>Non-stationary Sources</b>	1,100 MT of CO <sub>2</sub> E/year OR 4.6 MT CO <sub>2</sub> E/SP/year (residents + employees)
<b>Stationary Sources</b>	10,000 MT/year
<b>Plans</b>	6.6 MT CO <sub>2</sub> E/SP/year (residents + employees)

*Notes: SP = Service Population.*

*Project emissions can be expressed on a per-capita basis as Metric tons of CO<sub>2</sub>E/Service Population/year, which represents the project’s total estimated annual GHG emissions divided by the estimated total number of new residents and employees that would result from development of a project.*

*Neither BAAQMD nor Santa Barbara County includes any standards for construction-related emissions:*

*<http://www.sbcapcd.org/apcd/ceqa-ghg-faq.pdf>*



**Table 4.6-1  
 GHG Significance Determination Criteria**

<b>GHG Emission Source Category</b>	<b>Operational Emissions</b>
<u>Residential and Commercial Projects</u>	<u>Compliance with Qualified GHG Reduction Strategy</u> OR <u>Bright-Line Threshold of 1,150 MT of CO<sub>2</sub>e/yr</u> OR <u>Efficiency Threshold of 4.9 MT CO<sub>2</sub>e/SP*/yr</u>
<u>(Industrial) Stationary Sources</u>	<u>10,000 MT of CO<sub>2</sub>e/yr</u>

*\*SP = Service Population (residents + employees)  
 For projects other than stationary sources, compliance with either a Qualified Greenhouse Gas Reduction Strategy, or with the Bright-Line (1,150 CO<sub>2</sub>e/ yr.) or Efficiency Threshold (4.9 MT CO<sub>2</sub>e/SP/yr.) would result in an insignificant determination, and in compliance with the goals of AB 32. The construction emissions of projects will be amortized over the life of a project and added to the operational emissions. Emissions from construction-only projects (e.g. roadways, pipelines, etc.) will be amortized over the life of the project and compared to an adopted GHG Reduction Strategy or the Bright-Line Threshold only.*

The County's per-service population guideline is intended to avoid penalizing large projects that incorporate GHG-reduction measures such that they may have high total annual GHG emissions, but would be relatively efficient, as compared to projects of similar scale. However, this guideline is most appropriately used for large scale residential or commercial projects which would generate a large service population (defined as the sum of new residents and new employees that would result from a project). The proposed project is a relatively small residential development (44 units). As such, the ~~1,100~~ 1,150 metric tons of CO<sub>2</sub>E year threshold is most applicable to the proposed project. Therefore, the proposed project would have a potentially significant contribution to GHG emissions if it would result in greater than ~~1,100~~ 1,150 metric tons of CO<sub>2</sub>E/year (MT CO<sub>2</sub>E/year).

Impact statement GHG-1 on page 4.6-13 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

**Impact GHG-1**    **The project would generate short-term as well as long-term GHG emissions. These emissions would incrementally contribute to climate change. However, project emissions would not exceed the ~~1,100~~ 1,150 MT CO<sub>2</sub>E/year threshold. Impacts would be Class III, *less than significant*.**

The second paragraph on page 4.6-15 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:



As indicated in Table 4.6-5, CO2E emissions associated with the proposed project would not exceed the ~~1,100~~ 1,150 metric tons CO2E/year threshold of significance for non-stationary sources. Therefore, impacts would be less than significant.

The last paragraph on page 4.6-22 in Section 4.6 *Greenhouse Gas Emissions/Climate Change* has been revised as follows:

As indicated in Table 4.6-6 and Table 4.6-7, the proposed project would be consistent with CAT strategies and the 2008 Attorney General Greenhouse Gas Reduction Measures. In addition, as indicated in Table 4.6-5, the increase of GHG emissions associated with the project would be approximately 725 metric tons CO2E per year, which would not exceed Santa Barbara County's interim significance determination guideline of ~~1,100~~ 1,150 metric tons CO2E per year for non-stationary sources of GHGs. Therefore, GHG emissions from the proposed project would not be cumulatively considerable.

#### Response 3.4

The comment notes that the County's Park, Recreation and Trails Map 5 shows a proposed trail corridor along Harris Grade Road and that the EIR should analyze the loss of the proposed trail. Map 5 indicates a "Proposed Open Road Trail" within the right of way of Harris Grade Road. As described in Section 2.0 *Project Description* the proposed project would construct a five (5) foot wide concrete meandering pedestrian pathway, between the existing edge of Harris Grade Road and the project site. This pathway would be consistent with the County's proposed "Open Road Trail" along Harris Grade Road and would maintain pedestrian connectivity. Thus, annexation of this property into the City of Lompoc would not preclude development of the proposed "Open Road Trail" along the portion of Harris Grade Road adjacent to the project site. It should be noted that no portions of the "Open Road Trail" in the project vicinity have been constructed. Environmental impacts associated with the construction of the pedestrian pathway are discussed throughout the EIR.

#### Response 3.5

The commenter recommends that the project incorporate pedestrian paths in the site design to allow for connectivity. As described in Section 2.0 *Project Description* the project would include sidewalks throughout the development and a five (5) foot wide concrete pedestrian pathway, between the existing edge of Harris Grade Road and the project site. The pedestrian pathway would span from the entrance to the project site along Garden Gate Lane and southward along Harris Grade Road to the intersection of Purisima Road and Harris Grade Road (refer to Figure 2-3 in Section 2.0 *Project Description*).



Response 3.6

The commenter notes that pursuant to Government Code Section 6584.07, if annexation occurs the City and the County will need to reach an agreement to transfer a portion of the County's Regional Housing Needs Allocation to the City. The City intends to work with the County to development this agreement at the time when the County and City prepare the tax exchange agreement as required by law.





# Fire Department

*"Serving the community since 1926"*

## HEADQUARTERS

4410 Cathedral Oaks Road  
Santa Barbara, CA 93110-1042  
(805) 681-5500 FAX: (805) 681-5553

Michael W. Dyer  
Fire Chief  
County Fire Warden

Christian J. Hahn  
Deputy Fire Chief

## Letter 4

January 16, 2013

Lucille T. Breese, AICP  
City of Lompoc Planning Division  
100 Civic Center Plaza  
Lompoc, CA 93436

Dear Ms. Breese,

This letter is Santa Barbara County Fire Department's response to the draft Environmental Impact Report for the Summit View Homes project. We are opposed to the detachment of the property from the Santa Barbara County Fire Protection District. Santa Barbara County Fire Station #51 is located at 3500 Harris Grade Road. The Draft EIR states that Fire Station #51 is "approximately two miles north of the project site"; the actual distance, however, is one mile. Our most conservative estimate (using Geographic Information System mapping) shows that Engine 51's emergency response time to the proposed development is at least three minutes faster than the closest Lompoc Fire Department engine. Future residents of the Summit View Homes project would be best served by the closest available emergency resource.

4.1

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Peterson', is written over a horizontal line.

Eric Peterson  
Fire Marshal  
Santa Barbara County Fire Department

**Letter 4**

**COMMENTER:** Eric Peterson, Fire Marshal, Santa Barbara County Fire Department

**DATE:** January 16, 2013

**RESPONSE:**

Response 4.1

The commenter notes that County Fire Station #51 is one (1) mile from the project site, not two (2) miles as stated in the EIR. The commenter also noted that Station #51 would better serve the project due to its proximity. The second paragraph on page 4.10-1 in Section 4.10 *Public Services and Utilities* has been revised as follows:

The Santa Barbara County Fire Department has a fire station at 3510 Harris Grade Road, approximately ~~two~~ one miles north of the project site.

Regarding service to the project site, upon annexation the project site would be located within the City of Lompoc and therefore the Lompoc Fire Department would provide fire protection service to the project site. The primary Lompoc Fire Department station serving the project site is 1.8 miles away. As discussed under Impact PSU-1 in Section 4.10 *Public Services*, the Lompoc Fire Department has stated that the project site is well within their five (5) minute response zone and adequate fire protection services can be provided.





Santa Barbara County Public Works Department  
Flood Control & Water Agency

January 18, 2013

Letter 5

Lucille T. Breese, AICP  
City of Lompoc Planning Division  
100 Civic Center Plaza  
Lompoc, CA 93436

**RE: Summit View Homes Project Draft Environmental Impact Report; Lompoc**

Dear Ms. Breese,

Thank you for the opportunity to review the subject document. The Santa Barbara County Flood Control District has the following comments:

The project currently resides in the county and is proposed to be annexed by the City of Lompoc. Per the DEIR, the document states that "Stormwater runoff would be detained in this basin to reduce peak runoff levels at or below those of the undeveloped site condition." This project is located in the Mission Hills area which has potentially more restrictive basin volume requirements. Per Flood Control Standard Conditions of Approval, basins located in Mission Hills shall be designed with a volume;

1. Not less than 0.07 acre feet per acre for residential developments; and
2. A gravity bleeder line that reduces storm water runoff (maximum outflow discharge) from a 25-year 24-hour storm event developed condition to 0.07 cubic feet per second per acre.

5.1

The Flood Control District recommends careful consideration be given to the release of storm water generated by the project site to areas downstream, and that storm water detention within the project area is provided per the Flood Control Standard Conditions of Approval for projects in the Mission Hills area. It is also recommended that overland escape routes be able to collect and convey flows from the 100-year storm event in a controlled manner to a suitable downstream receptor, such that downstream areas are not impacted.

Please let us know if you have any questions.

Sincerely,

SANTA BARBARA COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT

By: Mark Luehrs  
Mark Luehrs, Development Review Engineer

**Letter 5**

**COMMENTER:** Mark Luehrs, Development Review Engineer, Santa Barbara County Flood Control & Water Conservation District

**DATE:** January 18, 2013

**RESPONSE:**

Response 5.1

The commenter notes that the project is located in the Mission Hills area which potentially has more restrictive basin volume requirements, and that per Flood Control Standard Conditions of Approval, the proposed basin shall be designed with a capacity of at least 0.07 acre feet per acre and a gravity bleeder line with a maximum outflow of 0.07 cubic feet per second. The commenter also notes that the project should consider downstream impacts and that overland escape routes must be able to collect and convey flows from a 100-year storm. Because the project would be annexed into the City of Lompoc, the drainage system was designed to meet City of Lompoc engineering standards, which require that the system flow rate is lower than the post-project rate. In addition, as described under Impact HWQ-3 in Section 4.7 *Hydrology and Water Quality*, existing culverts located in Harris Grade Road and Purisima Road have adequate capacity to convey 100-year peak flows from pre-project and post project-site conditions. In addition, with implementation of the proposed on-site detention basin, peak stormwater runoff from the site would be lower than pre-development conditions.





COUNTY OF SANTA BARBARA  
PUBLIC WORKS DEPARTMENT  
123 East Anapamu Street  
Santa Barbara, CA 93101  
805\568-3000 FAX 805\568-3019



SCOTT D. MCGOLPIN  
Director

January 23, 2013

Letter 6

Lucille T. Breese, AICP  
City of Lompoc Planning Division  
100 Civic Center Plaza  
Lompoc, CA 93436

Re: City of Lompoc Summit View Homes DEIR

Dear Ms. Breese,

The County of Santa Barbara Public Works Department has reviewed the subject document and offers the following comments:

1. If annexation is processed and approved by LAFCO, including the mutual adoption by the City and County of tax exchange and Regional Housing requirement agreements, the applicant shall annex the full width of fronting rights-of-way on Purisima and Harris Grade Roads, into the city boundaries. This shall be done as part of the LAFCO process. The county shall relinquish its maintenance responsibilities to the City of Lompoc as part of this annexation.
2. The applicant shall notify SBCAG that the Congestion Management Plan (CMP) responsibility for the intersection of Harris Grade/Purisima/Hwy 1 is now that of the City of Lompoc.

6.1

Thank you for the opportunity to comment on this project.

Sincerely,

Bret A. Stewart, P.E.

Senior Development Engineering manager

AA /EEO Employer

*Letter 6*

**COMMENTER:** Bret A. Stewart P.E., Senior Development Engineering Manager, County of Santa Barbara Public Works Department

**DATE:** January 23, 2013

**RESPONSE:**

Response 6.1

The commenter notes that if the annexation is approved by LAFCO, the applicant shall annex the full width of the fronting rights-of-way of Purisima Road and Harris Grade Road and the CMP intersection of Harris Grade Road and Highway 1 is now the responsibility of the City of Lompoc. This comment does not pertain specifically to a physical environmental issue, but will be forwarded to City decision makers.



Letter 7

January, 28, 2013

Lucille Breese, Planner  
100 Civic Center Plaza  
Lompoc, Calif. 93438-8001

Re: Summit View Homes

Ms. Breese,

Since our last meeting held there in Lompoc for this project ( Jan. 25, 2013), I have spoken with the Elders Council here in Santa Ynez and they have asked me to resend our previous comments, along with our reasoning for our position.

The SYBCI Elders Council would like to restate our original request for an XP1 on this project. The Council makes this request based on the following; A pedestrian survey is not adequate enough to make a determination for the presence or absence of cultural material located within soils; the proximity of this project to other projects in the area that have identified cultural material within or on the perimeter of their proposed APE, as well as it's accumulative impacts; recommendation by city's own consulting archaeologist for an archaeologist and NA monitoring during construction; should only a discovery clause be the final mitigating measure will leave the responsibility for identifying cultural material up to an inexperienced equipment operator.

7.1

It is for these reasons that the Elders Council strongly encourages the city of Lompoc and its planning commission to require that an XP1 take place prior to the permit approval.

The Elders Council thanks you for this opportunity to comment on this project. Should you have any questions don't hesitate to contact our office @ 805-688-7997.

Thank you,

Joe Talaugon, Chairman  
SYBCI Elders Council

*Letter 7*

COMMENTER: Joe Talaugon, Chairman, SYBCI Elders Council

DATE: January 28, 2013

RESPONSE:

Response 7.1

The commenter requests the preparation of an extended Phase I Archeological Survey Report. The extended Phase I report was completed in February 2013. The extended Phase 1 report was undertaken to determine the presence or absence of potentially significant subsurface prehistoric archaeological materials within the proposed project area. On February 12 and 13, 2013, 16 backhoe excavations were performed and systematically distributed throughout the 10.05-acre project area. The excavations did not identify any potential subsurface prehistoric archaeological materials within the proposed project area. All excavations were monitored by Amado Romero of the Santa Ynez Band of Mission Indians.

The results of the extended Phase I necessitated the following revisions to the EIR. The following paragraph was added to page 4.4-9 of Section 4.4 Cultural Resources:

Extended Phase I Archeological Survey. At the request of the Santa Ynez Band of Chumash Indians during the SB 18 consultation process, an extended Phase I Phase I Archeological Survey was performed in February 2013 by Dudek. The Phase I Archeological Investigation was undertaken to determine the presence or absence of potentially significant subsurface prehistoric archaeological materials within the proposed project area. On February 12 and 13, 2013, 16 backhoe excavations were performed and systematically distributed throughout the 10.05- acre project area. The excavations did not identify any potential subsurface prehistoric archaeological materials within the proposed project area. All excavations were monitored by Amado Romero of the Santa Ynez Band of Mission Indians.

Beginning on page 4.4-10, Impact CR-1 in Section 4.4 *Cultural Resources* has been revised as follows:

Impact CR-1      **No known archaeological resources have been identified on the project site and the presence of unknown archeological resources is unlikely. However, if during excavation archeological resources or human remains are unearthed, potentially significant impacts could occur. ~~implementation of the proposed project could adversely affect previously unidentified archaeological resources and/or human remains.~~ Impacts would be Class II, *significant but mitigable.***



The project site is identified by the Lompoc General Plan as having a “high sensitivity zone” archaeological potential (as identified in Figure 4.4-1). A Phase I Cultural Resource Survey was prepared for the project site by Rincon Consultants in August, 2012. The Phase I Cultural Resources Survey concluded that no cultural resources are known to occur within the project area and no resources were identified adjacent to the project area that could be indirectly impacted. The CCIC records search did not identify any previously recorded archaeological sites but did identify one previously recorded isolated find within 0.5 mile of the project area. Moreover, the project site has been previously disturbed due to past agricultural activities and is unlikely to contain any shallow, subsurface artifacts. The extended Phase I Archeological Survey Report performed 16 excavations on the project site and found no evidence of subsurface archeological resources. However, the proposed project would require excavation of soils up to approximately ten feet below the ground surface to construct the proposed detention basin near the southwestern portion of the site. Although such an event is unlikely based on the findings of the two Phase I reports prepared for the project site, This excavation could potentially unearth previously unidentified cultural resources. Therefore, encountering archaeological or paleontological resources, and/or human remains is possible. Impacts would be potentially significant.

**Mitigation Measures.** The following mitigation measures are required to avoid potential impacts to as yet undiscovered cultural resources (archaeological) and/or human remains that could be present on the project site.

- ~~CR-1(a) — **Archaeological Monitoring of Construction Activities.** Archaeological monitoring of project related ground disturbing activities shall be undertaken. In the event that cultural resources are exposed during project activities, the monitor shall be empowered to temporarily halt construction until the resource can be evaluated. At the conclusion of archaeological monitoring, a monitoring report summarizing the efforts and results shall be prepared and submitted to the City of Lompoc.~~
- ~~CR-1(b) — **Native American Monitoring of Construction Activities.** Native American monitoring of project related ground disturbing activities shall be undertaken. A local Chumash group, such as the Santa Ynez Band of Chumash Indians, shall be retained to conduct Native American monitoring during construction.~~
- CR-1(c)** **Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground disturbing activities, work in the immediate area shall halt and an archaeologist meeting the Secretary of the Interior’s *Professional Qualifications Standards* for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing and/or construction



activities associated with the proposed project, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a City-qualified archaeologist. An appropriate plan for the preservation of the artifacts from the site shall be prepared, and implementation of the plan shall be overseen by a City-qualified archaeologist prior to commencement of ground disturbing activities. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted pursuant to CEQA Section 21083.2.

**CR-1(db) Unanticipated Discovery of Human Remains.** ~~If human remains are discovered during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the Santa Barbara County Coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. In the event that unknown human remains are encountered during grading, clearing, grubbing and/or construction activities associated with the proposed project, all excavation and ground disturbing work on or adjacent to the project site (or area of discovery) shall be stopped immediately in the vicinity. The Santa Barbara County Coroner shall be contacted and the Native American Heritage Commission shall be notified immediately. No further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The site shall be evaluated by the most likely Chumash descendant identified by the Native American Heritage Commission and a City-qualified archaeologist.~~

**Significance After Mitigation.** With implementation of the above mitigation measures, potential impacts to undiscovered cultural resources and /or human remains would be reduced to a less than significant level.

**c. Cumulative Impacts.** Cumulative development within the City of Lompoc per the Current Project List dated 2012 includes the addition of 583 residential units, 288,632 square feet of commercial space, and 130,265 square feet of institutional space. The proposed project, in conjunction with other planned and pending development in Lompoc, ~~would~~ may cumulatively increase the potential for cultural resources to be altered or damaged. However, the project's contribution to cumulative impacts would be less than significant after implementation of Mitigation Measures CR-1(a-b). In addition, ~~B-~~because the potential to



create adverse impacts to such resources depends on the nature of each proposed project, including its specific site and surroundings, cultural resource issues must be addressed on a case-by-case basis. The requirements placed on all new developments as described in Section 4.4.1(f) of this EIR section, including any recommendations in site-specific cultural resource studies, would reduce cumulative impacts to a less than significant level.





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January 25, 2013

Lucille T. Breese, AICP  
City of Lompoc  
Community Development Department  
100 Civic Center Plaza  
Lompoc, CA 93438

**Subject: Comments Section 4.8 “Land Use and Policy Consistency” of the Summit View Homes Project Draft Environmental Impact Report**

Dear Ms. Breese:

Dudek has reviewed Section 4.8 “Land Use and Policy Consistency” Section of the Draft Environmental Impact Report (DEIR) for the Summit View Homes Project in Lompoc and we thank you for the opportunity to comment it. We offer the following comments on the “Land Use and Policy Consistency” Section of the DEIR:

DEIR page 4.8-16 states that the Proposed Project is “Potentially Consistent” with Policy 1.2 (“The City shall assure that sufficient capacity is available in the electrical system prior to approval of new development projects.”). Why is the Project not considered “Consistent” with this policy, as there is sufficient capacity available in the electrical system to accommodate the proposed Project? We respectfully request the Final EIR (FEIR) be revised to reflect this conclusion.

8.1

DEIR page 4.8-24 (Policy 1.11) states that the proposed project is “Potentially Inconsistent” with this policy as the development of 44 single family residential units may not be considered affordable to moderate income target groups. The proposed Project will be consistent with Policy 1.11, as either the requisite number of affordable units will be provided on-site or an in-lieu fee will be paid, as allowed in Policy 1.11, to address the required affordable requirement. We respectfully request the FEIR be revised to reflect this conclusion.

8.2

DEIR page 4.8-25 states: “However, the project would not be consistent with inclusionary housing goals.” Please refer to our comments above regarding Policy 1.11 and affordable housing requirements. As such, we respectfully request the FEIR be revised to conclude that the Proposed Project would be “Consistent” with inclusionary housing goals.

8.3



Lucille T. Breese, AICP  
January 25, 2013  
Page 2

General Comment

In the FEIR please include a discussion of the City of Lompoc's Certified FEIR on the "Lompoc General Plan Update" (Planning Division File No. EIR 09-01/State Clearinghouse No. 2008081032) and its review of the environmental effects of the Proposed Area D Annexation, General Plan Amendment and Rezone relating to the Summit View Homes subject property and its full environmental disclosure of the Proposed Annexation, General Plan Amendment and Rezone.

8.4

Thank you in advance for your consideration of these issues and for implementing these changes/refinements into the FEIR.

Should you have any questions regarding this DEIR review, please contact me at (805) 963-0651 ext. 3521, or [kmarshall@dudek.com](mailto:kmarshall@dudek.com).

Sincerely,



Kenneth E. Marshall, AICP  
Principal

CC: Whitt Hollis

**Letter 8**

**COMMENTER:** Kenneth E. Marshall AICP, Principal, Dudek

**DATE:** January 25, 2013

**RESPONSE:**

Response 8.1

Table 4.8-1 *General Plan Policy Consistency* on page 4.8-16 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:

<i>Public Services Element</i>	
<b>Policy 1.2.</b> The City shall assure that sufficient capacity is available in the electrical system prior to approval of new development projects.	<b>Potentially Consistent.</b> As discussed in Section 4.10, <i>Public Services and Utilities</i> , Pacific Gas & Electric and Southern California Gas Company, and AT&T Verizon telephone company have adequate capacity to provide electricity and gas to the proposed project site. Impacts are Class III, <i>less than significant</i> .

Response 8.2

The commenter notes that the EIR concluded the project is “Potentially Inconsistent” with Housing Element Policy 1.11, as discussed on page 4.8-24 in Section 4.8 *Land Use and Policy Consistency*. The City currently has an in-lieu fee program as an option when a project does not meet affordable housing requirements. Because the project applicant could pay in-lieu fees to the City, this requirement would be addressed. In response to this comment Table 4.8-1 *General Plan Policy Consistency* on page 4.8-24 in Section 4.8 *Land Use and Policy Consistency* has been revised as follows:



<i>Housing Element</i>	
<p><b>Policy 1.11.</b> With the exception of areas within the Old Town Redevelopment Project, Amendment No. 2 area, in all residential developments of ten units or more, at least 10% of all the units shall be affordable to target income groups. As an alternative to providing affordable housing on-site, the inclusionary requirement may be satisfied through other equivalent measures (e.g., production based on units of like size relative to numbers of bedrooms and bathrooms) including off-site construction, acquisition of affordability covenants on existing dwelling units, donation of land or payment of in-lieu fees. In accordance with State law, residential development projects within the Old Town Redevelopment Project, Amendment No. 2 area shall provide 15% of new housing affordable to low- and moderate-income households with at least 40% of those units to be used by very low-income households.</p>	<p><del>Potentially Inconsistent.</del> <b>Consistent.</b> The proposed project is the development of 44 single family residential units. These units may not be considered affordable to moderate income target groups. <u>However, the project applicant could choose to pay the adopted in-lieu fees in accordance with the City's fee program for affordable housing to offset the provision of affordable housing units or construct the inclusionary housing units.</u></p>

In addition, beginning with the first paragraph on page 4.8-26 in Section 4.8 *Land Use and Policy Consistency* the following has been revised.

As shown in Table 4.8-1, the proposed project would be generally consistent with the goals and policies of the City's General Plan, including but not limited to goals and policies related to economic development, conservation of resources and open space, air quality, the transportation and circulation system, and land use. ~~However, the project would not be consistent with inclusionary housing goals. No physical impacts to the environment would occur as a result of this inconsistency.~~ Ultimately, the determination for consistency is at the discretion of the City Council.

**Significance After Mitigation.** The proposed project is an allowed use under the Lompoc General Plan and Municipal Code. As shown in Table 4.8-1, the project would generally be consistent with adopted policies with incorporation of mitigation measures included in this EIR, ~~with the exception of inclusionary housing policies. However, no physical impacts to the environment would occur as a result of this inconsistency. In addition, the determination for consistency is at the discretion of the City Council.~~ Therefore, impacts would be less than significant without additional mitigation.

Response 8.3

Please see the revision in Response 8.2 above.



Response 8.4

The commenter requests that the EIR include a discussion of the EIR prepared for the Lompoc 2030 General Plan Update. The 2030 General Plan EIR evaluated potential future residential development on the project site as the “Wye Residential Expansion Area D”, and provided a programmatic assessment of the potential impacts of such development, which was assumed to include 46 single-family residential units. This programmatic evaluation was not based on a specific site plan or timing of development, in contrast to this EIR, which evaluates the specific development application for the Summit View Homes Project. It should be noted that while the EIR for the 2030 General Plan Update was certified for the purposes of adopting the Housing Element, the EIR has not been certified for the purposes of adopting the General Plan Land Use Element, and the Land Use Element itself has not yet been adopted.





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January 17, 2013

7649

Mr. R. W. ("Whitt) Hollis Jr.  
Director of Land Acquisition  
West Coast Housing Partners, LLC/Strategic Investment  
Westlake Park Place  
3027 Townsgate Road, Suite 250  
Westlake Village, CA 91361

***Subject: Comments Section 4.3 Biological Resources of the Summit View Homes Project  
Draft Environmental Impact Report***

Dear Mr. Hollis:

Dudek has reviewed Section 4.3 Biological Resources Section of the Draft Environmental Impact Report (DEIR) for the Summit View Homes Project in Lompoc. Below is a summary of impacts and requirements outlined in the DEIR section, and our comments on the adequacy of the section. In general, the recommendations in Section 4.3 would not impose requirements detrimental to the project.

#### **IMPACTS AND REQUIREMENTS**

In relation to biological resources, the DEIR notes two types of impacts: (1) impacts to special-status plant species and (2) impacts to special-status animal species. In both cases, impacts are considered Class II, significant but mitigable. To mitigate these impacts, the DEIR proposes the following measures that place restrictions on the project:

**Special-Status Plant Surveys (BIO-1a).** The DEIR calls for conducting seasonally timed special-status plant surveys no more than two years prior to "vegetation removal, ground disturbance, or other construction activities on-site." These surveys would follow California Department of Fish and Wildlife (CDFW - formerly California Department of Fish and Game, CDFG 2000) protocol and are intended to document the location of any plant species protected under the California Endangered Species Act (CESA). If any CESA-protected species are found, the applicant would be required to initiate a consultation with CDFW to ensure that the project not result in a net reduction of the population of any state-listed plant species occurring on-site. The DEIR states that

mitigation for impacts to CESA protected plants may include restoration of impacted plant species at a minimum ratio of 2:1. (p. 4.3-27)

**Nesting Bird Protection (BIO-2a).** This measure of the DEIR calls for conducting a nesting bird survey no more than two weeks prior to vegetation removal or initiation of grounds disturbances, should construction begin during the nesting bird season (February 1 to September 1). The survey would cover the entire site and a 100 foot buffer. If any nests are found, buffers around the nest, between 75 and 500 feet depending on the species, would be marked off, and no construction activities would take place within the buffer until young birds have fledged. No nesting bird restrictions are imposed if construction begins between September 2 and January 31. (p. 4.3-29)

The Biological Resources section of the DEIR also found that six special-status plant species not protected by CESA had at least a low potential to occur on the site, but concluded that impacts to these species would be less than significant. The DEIR determined that 18 special-status wildlife species (one invertebrate, two reptiles, seven birds, and eight mammals) have at least a low potential to occur. However, impacts related to these species were also determined to be less than significant, and no measures were suggested to protect them, other than nesting bird protection (BIO-2a). Assessments of less than significant to special-status species were generally made based on the poor habitat quality within the site and the low likelihood that these species would occur in significant numbers. Therefore, the project would not result in a substantial reduction of the populations of these species.

#### **SPECIAL-STATUS SPECIES OCCURRENCE (pp. 4.3-5 to 4.3-18)**

Among the special-status wildlife species with a low potential to occur are several that we believe are very unlikely to occur. While the DEIR inevitably determines that impacts to these species are less than significant, the acknowledgment of a low potential to occur could result in comments on the rationale behind the assessment that no impacts would occur and calling for additional mitigation. In particular, the DEIR cites American badger and mountain plover as having a low potential to occur. While this is probably true for the American badger, because of disturbances from adjacent developments, including the presence of domestic dogs, and because we believe that badger sign is easily detected and would have been observed during surveys, this species would only occur in transit and therefore no loss of habitat and no populations impacts to American badger would occur.

The relatively high grasses and forbs on the project site are not suitable for mountain plover, which occurs in winter in unvegetated and very sparsely vegetated areas. Therefore this species does not have the potential to occur on the site.

## CONCLUSION

We recommend that the following changes be made to the DEIR, Section 4.3 Biological Resources:

- *Table 4.3-5 (p. 4.3-28)*. Remove mountain plover from the list of species with potential to occur on the site. 9.1
- *American badger impact assessment (p. 4.3-29)*. Add that American badger dens are easily detected in the field and likely would have been observed during surveys. Further add that, because of disturbances and because no badger sign was detected on the site, this species is unlikely to occur.

We do agree with the DEIR that the project could potentially impact other special-status plants and special-status wildlife species, and we also agree that poor overall habitat quality likely reduces occurrences of special-status species, and therefore potential impacts to these species. Some possibility exists that CESA-protected plants could occur, although it is unlikely. Regardless, mitigation of the loss of the species at 2:1 is standard and reasonable (as well as unlikely to be necessary). Therefore, we believe the proposed mitigation measures are reasonable and would not be detrimental to the project, and we do not recommend changes to measures included in the Biological Resources Section of the DEIR. 9.2

Should you have any questions on this review, please contact me at (805) 963-0651 ext. 3536, or contact John Davis at extension 3524.

Sincerely,



David Compton  
Biologist  
**Dudek**

**Letter 9**

**COMMENTER:** David Compton, Biologist, Dudek

**DATE:** January 17, 2013

**RESPONSE:**

Response 9.1

The commenter summarized various mitigation measures and conclusions from Section 4.3 *Biological Resources* of the EIR. The commenter concurs with the conclusion that less than significant impacts would occur to the American Badger. The commenter disagrees with the EIR that the mountain plover has a low potential to occur on the project site and states that this species does not have any potential to occur on the project site. The commenter requests that the mountain plover is removed from the list of species with potential to occur on-site, included in Table 4.3-5, and that additional language is provided to further support that the American badger has a low potential to occur.

The mountain plover was identified in the California Natural Diversity Database five-mile radius search performed for the project site and is therefore included in Table 4.3-5 and discussed accordingly in the EIR. The EIR accurately states that the mountain plover has a low potential to occur primarily due to marginal foraging habitat. There is no evidence presented to support removal of this species from the list of species with the potential to occur.

Section 4.3 *Biological Resources* page 4.3-29 states that during the reconnaissance level survey no suitable badger burrows were observed and the species has a low potential to occur on-site. It is also stated that due to domestic disturbances, the species is unlikely to occur.

Response 9.2

The commenter concurs with other conclusions and mitigation measures contain in Section 4.3 *Biological Resources*. No further response is necessary.





Letter 10

January 25, 2013

7649

Mr. Whitt Hollis  
Vice President - Land Acquisition  
West Coast Housing Partners, LLC  
3027 Townsgate Road, Suite 250  
Westlake Village, CA 91361

***Subject: Summit View Homes Draft Environmental Impact Report (EIR)  
Cultural Resources***

Dear Mr. Hollis:

I have reviewed the Summit View Homes Project Draft EIR Section 4.4 Cultural Resources and have identified the following issues requiring revision.

**1. Pg. 4.4-8, Paragraph 7. Impact CR-1, Records Search Results**

- a. The EIR background research included reviewing 31 previous archaeological studies within 0.5 miles of the project area accessed from the Central Coast Information Center (CCIC), University of California, Santa Barbara. The objectives of this research, which is required of all professional archaeological investigations, is: 1) to determine if the proposed project area has been previously investigated by qualified archaeologists; 2) if these investigations have identified potentially significant cultural resources within the project area; and 3) to develop a regional context for understanding the potential for unknown archaeological sites to exist within the project area.

10.1

The EIR improperly includes the results of the CCIC records search within Impact CR-1, rather than locating the data previously on page 4.4-8, Records Search. As Records Search data is “background research,” it is correctly placed in the Environmental Setting section of the EIR, rather than the Impacts section.

- b. The EIR does not use the information from the Records Search to address the three objectives identified above.

The records search identified that ten studies have been conducted within the project area from 1983 through 2001. A review of the CCIC records search Investigation Maps

10.2

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indicates that the surveyed areas covered the western and southerly portions of the project area, and a corridor through the central portion of the project area associated with the Coastal Branch Aqueduct.

The CCIC records search indicated that six additional archaeological surveys have been completed immediately adjacent to all four of the project boundaries (two on the west, two on the south, one on the north, and one to the east). None of these investigations identified prehistoric archaeological sites.

10.2

Extending from the project site and its boundaries, the records search indicates that additional surveys have been completed throughout the 0.5-mile radius from the project, all with negative results.

c. The results of the CCIC records search need to be clearly expressed in terms of the objectives defined above:

1. Of the 31 studies that have been completed within 0.5 miles of the site, 10 have addressed portions of the project area including along the western and southern boundaries, and a corridor through the middle. The acreage previously investigated is estimated to be over 35 percent of the entire project area. No cultural resources were identified during these investigations.

2. In addition, areas on all sides of the project area, including the La Purisima Highlands Project to the south, TTM 13,445 to the east, Martin-Farrell Homes Project and Alan Hancock College Improvements to the west, and Land's End Project to the north all did not identify any cultural resources.

10.3

3. The large number of intensive archaeological investigation identified by a variety of qualified archaeologists throughout the 0.5-mile vicinity of the project area has not identified any potentially significant archaeological sites. The reasonable conclusion from this research is that the Summit View Homes has a low potential as a location of unknown prehistoric cultural resources.

These necessary revisions to the Draft EIR clearly indicate that substantial evidence provided by the CCIC Records Search demonstrates that the potential for unknown archaeological resources to be located within the project area is low.

Mr. Whitt Hollis

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**2. Pg. 4.4-9, Paragraph 3. Native American Consultation**

Communication with Mr. Freddie Romero, Santa Ynez Band of Chumash Indians Elders Council, indicates that he believes the project area is “sensitive for buried deposits.” Though the intent of this wording of the statement is not clear, it appears that the EIR means that Mr. Romero considers results from an intensive archaeological ground survey are incapable of identifying the presence of unknown, buried archaeological sites. Mr. Romero bases his concern on the discovery of archaeological deposits at the Burton Ranch project, north of the proposed project on the opposite side of Harris Grade Road, and the Allan Hancock School Security Building (the location of the latter project was gleaned from reports dated December 6, 2011 and March 6, 2012 prepared by Applied Earthworks, Inc.).

10.4

No construction has occurred at the Burton Ranch Project, owned by the Towbes Group, Inc. (TGI), according to Courtney Seepie, TGI Project Manager (personal communication, January 23, 2013). Therefore, no subsurface archaeological deposits have been identified during construction on this development site.

Review of the two reports provided by Applied Earthworks to Rincon Consultants upon my request (*Preliminary Field Closure Report, Phase 2 Archaeological Study for the Allen Hancock College Public Safety Complex, 12/6/11*; *Preliminary Field Closure Report, Phase 2/3 Archaeological Study at Area 5 (CA-SBA-4017) for the Allen Hancock College Public Safety Complex, 3/6/12*), indicates that two small concentrations of stone tool flakes were identified over 3,100 feet (0.59 mile) southwest of the proposed project site. One of the sites was indicated by the presence of a surface artifact, a chipped stone tool flake. The two sites “represent single, limited use areas where late stage tool manufacture/maintenance tasks were performed, perhaps in conjunction with hunting activities. (Applied Earthworks 2011). Test excavations at the site do not identify the depth of the deposit or whether they were covered with fill. A third archaeological site was characterized as 9,600 square meters in size with several loose concentrations of fire-affected rock and a low density flaked stone and ground stone assemblage (Applied Earthworks 2012). The large size of this site suggests that it was identified on the basis of surface artifacts, though this is not clear from the reports provided.

10.4

The information provided above indicates that no archaeological sites have been identified within the project area vicinity during grading. The archaeological sites that have been recently recorded are over 0.5 miles away from the project area, and are separated by project sites where intensive archaeological surveys have not identified archaeological resources. In addition, the three recorded archaeological sites are approximately 800 feet from a perennial blue line creek, whereas the Summit View Homes project area is over 2,600 feet from the

Santa Ynez River. Therefore, the two recently recorded archaeological sites are located in a different environmental context, relatively close to a permanent water source. Conversely, the project area is over 0.5 mile from this environmental context. The distribution of prehistoric archaeological sites in the Lompoc Valley is dominated by large permanent settlements and smaller temporary camps located in proximity to permanent water sources. As stated above, the project area is located substantially distant from such a water source.

10.4

The substantial evidence presented above indicates that unknown prehistoric archaeological sites have not been identified during construction within 0.5 miles of the project area. No such resources have been identified on the Burton Ranch project site to the north, as no construction has yet occurred. Prehistoric sites have been identified in proximity to permanent water sources, over 0.5 mile away from the project area. As a result, there is no factual basis for stating that there is a high potential for unknown, buried archaeological sites within the project area.

**3. Pg. 4.4-8, Paragraph 5. Field Survey**

The results of the Phase 1 intensive field survey by Rincon Consultants, Inc. archaeologists should be provided here, prior to discussion of potential project impacts. As stated in Impact CR-1 no archaeological resources were identified. There is no discussion as to the reliability of these results, but it is assumed that the field survey was undertaken with professional and City of Lompoc standards.

10.5

**4. Pg. 4.4-9, Paragraph 7. Impact CR-1**

The impact discussion states that “The project site is identified as having a high archaeological potential (as identified in Figure 4.4-1).” This statement is incorrect and misinterprets City of Lompoc General Plan Resource Management Element. Policy 3.3.states,

*The City shall use the Archaeological Sensitivity Zones map to determine the type and extent of archaeological resource evaluation necessary for development projects.*

10.6

In practice, the Archaeological Sensitivity Zones map is used to determine when a systematic Phase 1 archaeological resources surface survey is required. In this case, the City of Lompoc determined that such an investigation was required to determine the potential for unknown cultural resources. The results of the investigation are considered to be the specific substantial evidence used to determine the means necessary to ensure project consistency with Policy 3.4, which states,

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*The City shall protect significant archaeological resources for the enjoyment and edification of future generations.*

Therefore, the potential of the project area to contain unknown, potentially significant archaeological resources must be based on the substantial evidence collected during the Phase 1 Archaeological Investigation. This includes the results of the background research and the survey. As stated above, the background research indicates that 31 studies within 0.5 miles of the project area, including in part within and along all project boundaries, have not identified any archaeological sites. The results of the intensive field survey were negative. Therefore, the substantial evidence collected during the Phase 1 archaeological investigation indicate that there is a *low potential* for unknown archaeological resources to be present onsite.

10.7

This revision is required as it is supported by factual, substantial evidence.

**5. Pg. 4.4-9, Paragraph 7. Impact CR-1**

The discussion of this impact states, “Therefore, encountering archaeological or paleontological resources, and/or human remains is possible.”

There is no factual basis for stating that identifying human remains is possible within the project area. No archaeological sites including human remains have been identified within 0.5 miles of the project area. The three recently recorded archaeological sites (Applied Earthworks 2011, 2012) did not include human remains. Therefore, this statement is erroneous and requires correction. Based on the substantial evidence identified in comments No. 1 and 2 above, it is reasonable and accurate to state:

10.8

“Given the absence of recorded prehistoric archaeological sites in the project vicinity with similar environmental contexts, there is a low likelihood of impacting unknown prehistoric archaeological sites, including human remains, during construction. Impacts on cultural resources would be less than significant.”

The substantial evidence in the record concludes that the proposed project would have a less than significant impact on cultural resources.

**6. Pg. 4.4-10, Paragraph 3 and 4. Mitigation Measures CR-1(a) and CR-1(b)**

As stated above in Comments 1, 2, and 4 above, all substantial evidence collected during the project Phase 1 archaeological investigation indicates that the proposed project has a low potential to impact unknown prehistoric archaeological resources. The proposed project would

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have a less than significant impact on cultural resources. Therefore, there is no nexus to require construction monitoring by a qualified archaeologist and Native American.

The Burton Mesa Specific Plan Final EIR (City of Lompoc 2005), which analyzed impacts resulting from development of up to 400 residential units adjacent and north of the proposed project area, determined that impacts on cultural resources were less than significant (Class III) on the basis of the intensive Phase 1 archaeological investigations on that property. Conditions of Approval for this project, as well as the Bluffs at Mesa Oaks and Land's End projects within the County of Santa Barbara directly north of the proposed project area and east of Harris Grade Road, also were based on this environmental finding.

10.9

Therefore, the substantial evidence available resulting from the Phase 1 Archaeological Investigation for the proposed project and precedent established by the City of Lompoc and County of Santa Barbara for adjacent properties indicates that there is no legal basis for DEIR Mitigation Measures CR-1(a) and CR-1(b). These measures need to be deleted from the Final EIR.

**7. Pg. 4.4-10, Paragraph 5. Mitigation Measures CR-1(c)**

This mitigation language identifying the process for treating an unexpected cultural resource during grading does not incorporate standard language adopted by the City of Lompoc. The following measure approved in the Burton Ranch Specific Plan project achieves this objective.

In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or construction activities associated with the proposed project, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a City-qualified archaeologist. An appropriate plan for the preservation of the artifacts from the site shall be prepared and implementation of the plan shall be overseen by a City-qualified archaeologist, prior to commencement of ground disturbing activities.

10.10

This existing City of Lompoc condition of approval language should replace the DEIR Mitigation Measure CR-1(c) wording to provide to ensure consistency with City protocols.

**8. Pg. 4.4-11, Paragraph 3. Cumulative Impacts**

This section does not identify the proposed project's contribution to potential cumulative impacts on cultural resources. The discussion appears to suggest that related probable development within the City of Lompoc would have the potential to result in a cumulatively considerable (i.e.,

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significant) impact as defined in CEQA Guidelines Section 15130. CEQA Guidelines Section 15130(a)(3) requires that the EIR identify the proposed project's contribution to the cumulative impact and determine how to mitigate the contribution if it also is cumulatively considerable.

In this case, the proposed project's impact on cultural resources is appropriately characterized as less than significant. Therefore, pursuant to CEQA Guidelines Section 15130(a)(3), regional cumulative impacts on cultural resources may be cumulatively considerable, but they would be reduced to less than cumulatively considerable with site-specific mitigations. The proposed project's contribution to this regional cumulative impact would be less than cumulatively considerable.

10.11

The DEIR discussion should be revised accordingly.

I am pleased to provide any additional clarification of these issues.

Sincerely,



David Stone, RPA  
Cultural Resources Manager

cc: Ken Marshall, Dudek

**Letter 10**

**COMMENTER:** David Stone RPA, Cultural Resources Manager, Dudek

**DATE:** January 25, 2013

**RESPONSE:**

Response 10.1

The commenter summarizes the Central Coast Information Center (CCIC) record search objectives and the results contained in Section 4.4 *Cultural Resources* of the EIR. The commenter states that the EIR improperly includes the results of the CCIC records search within Impact CR-1 because that information should only be included in the Environmental Setting. The CCIC records search results are described in the methodology section of Section 4.4 *Cultural Resources* to detail the approach to collecting supporting evidence used in the analysis. Impact CR-1 summarizes the results of the CCIC search detailed in the methodology section because this information provides the basis for the conclusions of the impact analysis.

Response 10.2

The commenter states that the EIR did not include all the information from the CCIC records search, consistent with the referenced objectives of the records search. The EIR sufficiently summarized the results of the CCIC records search. As stated in CEQA Guideline Section 15147, the EIR needs only include summarized technical data and relevant information sufficient to permit full assessment of significant environmental impacts.

Response 10.3

The commenter reiterates that the CCIC records search needs to be clearly expressed in terms of the objectives of the records search. See response 10.2. The commenter summarizes key findings of the CCIC records search and states that the EIR needs to be revised to clearly indicate that substantial evidence provided by the CCIC records search indicates that the potential for unknown archeological resources is low. Section 4.4 *Cultural Resources* detailed and summarized the results of the CCIC records search and concluded, based on the CCIC results, that the project site is “unlikely to contain any shallow, subsurface artifacts”. Moreover, the extended Phase I Archeological Survey performed 16 excavations on the project site up to depths of 60 inches. Because the project would require excavation up to 10 feet below the surface, it is possible that unknown archeological resources could be unearthed, as it is not possible to conclude with absolute certainty that no subsurface resources could be found during construction. The EIR prescribes mitigation measures accordingly. Please note that the results of the extended Phase I Archeological Survey Report were incorporated into Section 4.4 *Cultural Resources*. Please see the additional revisions in Response 7.1.





#### Response 10.4

The commenter summarizes communication with Mr. Freddie Romero of the Santa Ynez Band of Chumash Indians, as contained in Section 4.4 *Cultural Resources*. As discussed therein, Mr. Romero stated that the proposed project site is sensitive because it may contain subsurface archeological resources. The commenter provides information to counter Mr. Romero's assertions by summarizing results of archeological studies within the project vicinity, including two (2) cultural resource studies performed in the project vicinity that indicate no subsurface archeological resources have been found in the area. The commenter states there is no factual basis for Mr. Romero's statements and that there is not a high potential for unknown archeological sites within the project area. Section 4.4 *Cultural Resources* contains a summary of Mr. Romero's comments during the SB 18 consultation process for informational purposes. The purpose of the SB 18 process is to engage Native American tribes in the planning process to ensure their concerns are considered. It is important to note that the evidence provided by the Phase I Cultural Resource Study and the extended Phase I Archeological Survey Report form the basis for the conclusions of the EIR.

#### Response 10.5

The commenter states that the results of the field survey should be further detailed. The commenter states that there is no discussion as to the reliability of the survey and that it is assumed the survey was undertaken with professional standards. The field survey was performed by a professional archeologist and with professional, state of the practice procedures. In response to the comment regarding the field survey, the following information has been added to the fifth paragraph on page 4.4-9 in Section 4.4 *Cultural Resources*:

Rincon archaeologists conducted a cultural resources survey of the project area on August 21, 2012. The project area was surveyed using transects oriented north-south and spaced no greater than 10 meters apart. All exposed ground surface was examined for artifacts- (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock [FAR]), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as burrows and drainages were visually inspected. Ground visibility during survey was somewhat poor (roughly 30%) due to the presence of planted hay and wild vegetation. No cultural resources (archaeological or historic built environment) were observed within the project area.

#### Response 10.6

The commenter states that the EIR misinterprets Figure 4.4-1 in Section 4.4 *Cultural Resources*. The EIR correctly states that Figure 4.4-1 is identified as an area with high archeological potential. The precise terminology used in the General Plan figure is "high sensitivity zone". It is important to note that the EIR does not base its conclusions on Figure 4.4-1 alone. The



sentence subsequent to the commenter's citation states "The *Phase I Cultural Resources Survey* concluded that no cultural resources are known to occur within the project area and no resources were identified adjacent to the project area that could be indirectly impacted." In addition, the results of the extended Phase I Archeological Survey also support the conclusions of the EIR. In response to this comment, the following revisions have been made for clarification purposes. The first two (2) sentences of the first paragraph on page 4.4-9 in Section 4.4 Cultural Resources have been revised as follows:

The project site is identified by the Lompoc General Plan as ~~having~~ a "high sensitivity zone" ~~archaeological potential~~ (as identified in Figure 4.4-1). A Phase I Cultural Resource Survey was prepared for the project site by Rincon Consultants in August, 2012. The *Phase I Cultural Resources Survey* concluded that no cultural resources are known to occur within the project area and no resources were identified adjacent to the project area that could be indirectly impacted.

The commenter stated that the Phase I report should provide evidence that there is low potential for unknown archeological resources to occur. The Phase I report provides evidence that there are no *known* resources on the project site. In addition, the extended Phase I Archeological Survey provides evidence that no subsurface resources occur at the 16 excavation location and at depths up to 60 inches. It is not possible to make any absolute conclusions regarding unknown cultural resources until excavation occurs at the precise construction location. In addition, construction activities would require excavation up to a depth of 10 feet. As a result, the EIR concludes that while no *known* cultural resources occur on the project site, it is possible, though unlikely, that unknown resources, including human remains, may be unearthed during grading, as the project would require excavation up to 10 feet. As a result, the EIR prescribes mitigation measures accordingly. Please see revisions to Section 4.4 Cultural Resources in Response 7.1.

#### Response 10.7

The commenter states that there is no factual basis for the EIR to conclude that "archaeological or paleontological resources, and/or human remains is possible". Refer to Response 10.6.

#### Response 10.8

The commenter disagrees with the EIR's conclusion regarding unknown cultural resources and states there is no nexus to require construction monitoring as mitigation. The commenter notes that nearby properties concluded that impacts to cultural resources were less than significant. The commenter states there is no legal basis for requiring Mitigation Measures CR-1(a) and CR-1(b). Please note that Mitigation Measures CR-1(a) and CR-1(b) have been removed from the EIR based on the findings of the extended Phase I Archeological Survey Report. Refer to Response 10.6 and 7.1. Please note that the conclusions of environmental



review documents for nearby project sites are conclusions specific to those project sites and the construction activities that would occur for those projects.

#### Response 10.9

The commenter states that Mitigation Measures CR-1(a) and CR-1(b) need to be revised to be consistent with standard conditions of approval language. As noted in Response 10.8, these mitigation measures have been removed. The remaining mitigation measures have been revised to be consistent with the City's standard mitigation language for cultural resources. See Response 7.1.

#### Response 10.10

The commenter states the cumulative impact analysis in Section 4.4 *Cultural Resources* does not discuss the project's contribution to potential cumulative impacts on cultural resources and therefore does not comply with Section 15130(a)(3). In response to this comment, the cumulative impact analysis on page 4.4-11 in Section 4.4 *Cultural Resources* has been modified as follows:

Cumulative development within the City of Lompoc per the Current Project List dated 2012, includes the addition of 583 residential units, 288,632 square feet of commercial space, and 130,265 square feet of institutional space. The proposed project, in conjunction with other planned and pending development in Lompoc, ~~would~~ may cumulatively increase the potential for cultural resources to be altered or damaged. However, the project's contribution to cumulative impacts would be less than significant after implementation of Mitigation Measures CR-1(a-d). In addition, ~~B~~ because the potential to create adverse impacts to such resources depends on the nature of each proposed project, including its specific site and surroundings, cultural resource issues must be addressed on a case-by-case basis. The requirements placed on all new developments as described in Section 4.4.1(f) of this EIR section, including any recommendations in site-specific cultural resource studies, would reduce cumulative impacts to a less than significant level.

The commenter states that the project's impact on cultural resources is appropriately characterized and concurs with the cumulative impact conclusion. No further response is necessary.



Letter 11

FROM: Lane's End Homeowners

DATE: 26 Jan 13

TO: Ms. Lucille Breese

SUBJECT: Summit View EIR Comments from Lane's End Residents

The residents of Lane's End have reviewed the Summit View Homes Draft EIR dated December 2012 and have several concerns, requests and recommendations to bring forward to the planning commission for formal review and resolution. Our primary concerns center around the obvious negative impacts to our neighborhood should the Summit View development be allowed to proceed as proposed. Are primary concerns are: 1- The loss of home values due to view obstruction. 2- Traffic congestion (and consequential safety hazards) from co-utilization of a single access road. 3- Privacy. 4- Air Quality during construction. 5- Incorporating Low Impact Development methods. 6- Home density not similar to surrounding neighborhoods.

11.1

At this time we request the following actions be taken to mitigate the adverse impacts to our neighborhood and existing residents.

- 1) Construct a 100 foot wide green belt along the border between Lane's End and Summit View stretching from Gardengate Lane south to La Purisma Road to provide privacy and aesthetic value for both neighborhoods. Native vegetation with trees and shrubs with maturity heights no higher than 15 feet should be planted and should include a meandering dirt walking path. This greenbelt would displace only four lots from the proposed development.
- 2) In order to mitigate view obstruction for existing Lane's End residents, all Summit View homes should be single story with maximum heights of 18 feet and pad elevation restrictions as detailed below.
- 3) The Summit View primary access road should be moved to either La Purisma Road or Harris Grade Road to prevent traffic congestion on Gardengate Lane. See below for more details.
- 4) During construction, dust suppression/control measures should be implemented 7 days a week, including holidays, and the site superintendant's phone number be posted at the site.
- 5) Construction traffic and equipment will not be allowed to access the site via Gardengate Lane. Alternate access must be provided via Harris Grade Road or La Purisma Road.
- 6) Summit View project should be re-designed to incorporate decreased home density to mirror surrounding developments as detailed below.

11.1

We feel these are reasonable requests. Below we have addressed each concern relative to its corresponding paragraph within the EIR.

## 1. SECTION 4.1 AESTHETICS

The EIR did not address the current views from existing homes but only addressed views from travelers along adjacent roads and highways. Current residents along the west side of Lane's End (easterly boarder of Summit View) enjoy a spectacular view of the Lompoc Valley and adjacent mountain range.



**Figure 1: Existing View from Lane's End Residents' abutting Summit View Site**

These particular homes' market values are tied to the view and will suffer significant decreases with the addition of the Summit View homes. Homeowners not only pay a premium for views but purchase view homes for their intrinsic value. Lane's End residents would like to protect existing views to the maximum extent feasible through thoughtful planning of proposed pad elevations and placement of one story homes.

**Residents of Lane's End request placement of one story homes (18 ft max ht) on all lots throughout the development. In addition, all lots south of lots 1, 2, 3 & 40 should have pad elevations no greater than 205 ft. The Summit View project will inevitably result in home depreciation for all Lane's End residents, but these measures should help mitigate decreased home values resulting from view obstruction.**

In addition, please consider the following as possible mitigations for view and privacy protection:

Reduction of building height, excavation of building into site, hip roofs / direction of roof pitch / break up roof mass, siting of new structure, footprint of new structure, control of window, deck or balcony placement, view blockage of only "secondary" views (i.e. Bedroom instead of living room)

### Privacy/View fences

Many of the homes at Lane's End have view fences in their back yards. Given the proximity of the new development to a number of Lane's End homes, privacy becomes an issue. Because of the elevation differences between Lane's End and Summit View, standard 6 ft privacy fences will be ineffective.

11.2

11.3



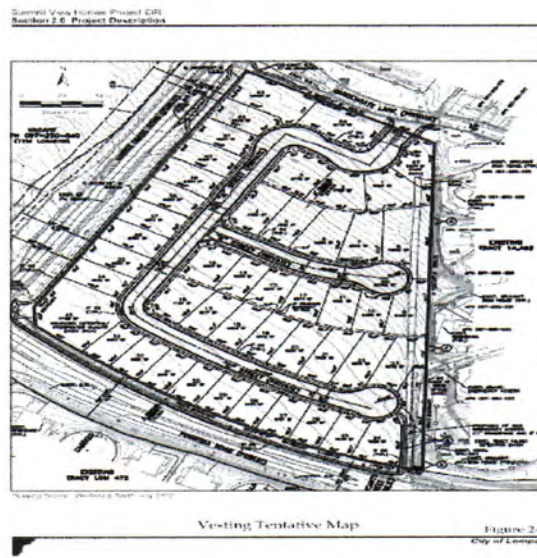
**Figure 2: Existing Lane's End Residents' Fence abutting the Summit View Site**

The residents of Lane's End request a 100 ft wide green belt between the two developments which incorporates trees and shrubs that grow to a maximum height of 15 feet. This green belt should be designed similar to the green belt immediately North of Lane's End which separates Lane's End and The Bluffs subdivision. The existing green belt provides many benefits to residents of both neighborhoods including privacy and recreational enjoyment. A green belt between Summit View and Lane's End would provide privacy and aesthetic value to both neighborhoods without causing view obstruction.

11.4

**2. SECTION 4.11 TRANSPORTATION AND CIRCULATION**

The proposed Summit View Layout shows only one primary access and one emergency access. The proposed emergency access is the same as the existing emergency access for Lane's End.



11.5

**Figure 3: Proposed Summit View Layout, EIR Figure 2-3**

Lane's End and the proposed Summit View development are surrounded by a High Fire Hazard zone defined by Cal Fire.

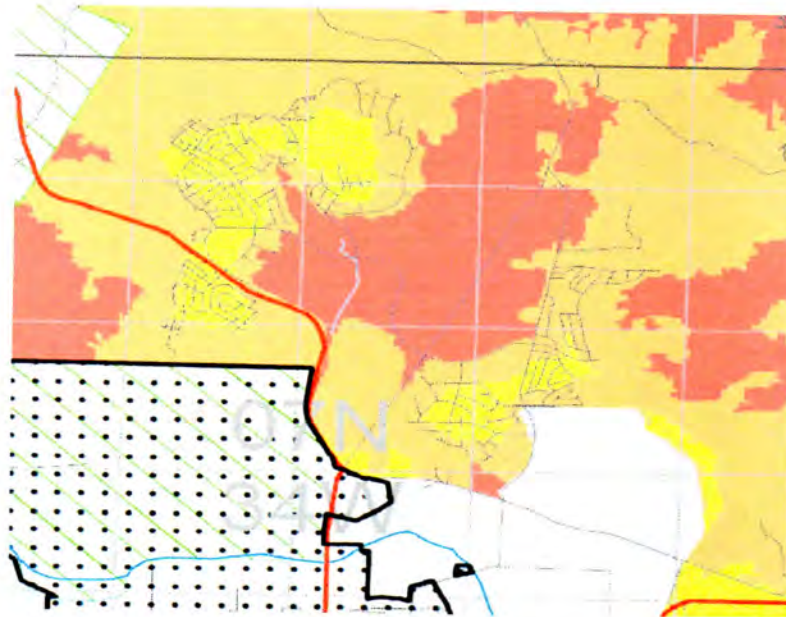


Figure 4: Santa Barbara County Fire Hazard Severity Zone Map by Cal Fire dated 7 Nov 07

Santa Barbara County Private Road and Driveway standards require multiple accesses for private roads of 30 homes or more in High Fire Hazard areas. Lane's End is adjacent to high fire zones to the north and east. Summit View is proposing 44 additional homes; Lane's End has 40 homes, totaling 84+ homes sharing one primary access and one emergency access. **Residents of Lane's End strongly oppose co-utilization of our primary access road. We request the Summit View project move its primary access road to the south end of the area (enter/exit from La Purisma Road). This will alleviate traffic congestion and safety hazards. In addition, the Lane's End entry sign and HOA landscaped area is within the proposed shared length of primary access on Gardengate Lane. If developed as proposed, the expense of modification to this area would be the responsibility of the Summit View development AND with approval of Lane's End HOA. If developed as proposed, will the access road (Gardengate Ln) be maintained by the city of Lompoc or Summit View HOA? Finally, residents of Lane's End request that all construction traffic enter and exit the site from either Harris Grade Rd or La Purisma Rd to avoid traffic congestion and potential damage to our primary access road (Gardengate Ln).**

#### Appendix F-Traffic Study

Traffic volumes discussed in Appendix F page 5 state a traffic study was performed on Wed 3 Aug 11, no timeframe was specified. For the intersection of Harris Grade/Garden Gate, peak traffic may be before or after church services or during morning commuter traffic, likely between 0700 and 0800. **Since conclusions of traffic impacts hinge on peak hour traffic volumes, the residents of Lane's End request the timeframe of the traffic study be documented as well as considerations given to traffic associated with the church.**

Per the Traffic Study in Appendix F, the figures below show existing traffic patterns at the two intersections impacted by the development

11.6

11.7

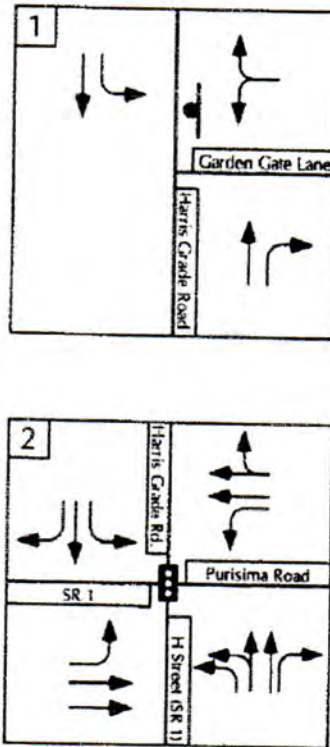


Figure 5: Traffic Analysis (Source- EIR Appendix F, Traffic Study, pg 8)

From the traffic study, morning peak hour traffic turning left at Gardengate Ln will more than double, from 20 to 43 vehicles; yet in traffic Study Table 5 (shown below) the existing Delay is shown as 14.0sec with the future delay being 15.0sec. **Why is it that 20 vehicles have a 14.0 sec delay and adding an additional 23 vehicles increases the delay by only 1.3 sec? It does not seem reasonable given the traffic volume on Harris Grade and 43 projected vehicles making left hand turns.**

11.8

Table 5  
Existing + Project Levels of Service

Intersection	Delay/LOS			
	A.M. Peak Hour		P.M. Peak Hour	
	Existing	Existing + Project	Existing	Existing + Project
SR 1/Purisima Rd/Harris Grade Rd	24.3 Sec./LOS C	25.0 Sec./LOS C	24.2 Sec./LOS C	24.6 Sec./LOS C
Harris Grade Rd/Gardengate Ln	14.0 Sec./LOS B	15.3 Sec./LOS C	13.5 Sec./LOS B	14.0 Sec./LOS B

LOS based on average seconds of delay per vehicle, pursuant to 2010 HCM.

Figure 6: Existing + Project Levels of Service (Source- EIR Appendix F page pg 11)



From the traffic study, Harris Grade and Highway 1 have much heavier traffic than Purisma Road. Adding access at Purisma Road will alleviate traffic at Gardengate Lane AND congestion/traffic stacking on Hwy 1 and Harris Grade at the large intersection. **The residents of Lane's End request primary access at Purisma Road be required for the Summit View project.** Note; La Purisma Highlands has primary access on Purisma Road.

11.9

### 3. SECTION 4.2 AIR QUALITY

The proposed project is located in area subject to strong prevailing winds from the northwest. Existing Lane's End homes are located downwind of the proposed construction site. Dust control (particulate matter) during construction is a major concern for neighboring residents. **During project construction, the residents of Lane's End request dust suppression/control measures mandated 7 days a week, including holidays, and the site superintendant's phone number be posted at the site.**

11.10

#### **Housing Density:**

The proposed Summit View layout clearly resembles conventional site design with lot densities significantly higher than the surrounding developments of Lane's End, La Purisma Highlands, Bluffs and Mesa Oaks. Smaller lots will negatively affect pricing which will attract lower income residents and negatively affect surrounding home values. **The lot density should be reduced to mirror surrounding neighborhoods. Studies of surrounding neighborhoods should be conducted to determine average lot size and homes per acre for comparison and conformance of Summit View development.**

11.11

The Summit View site design from the EIR is shown below.

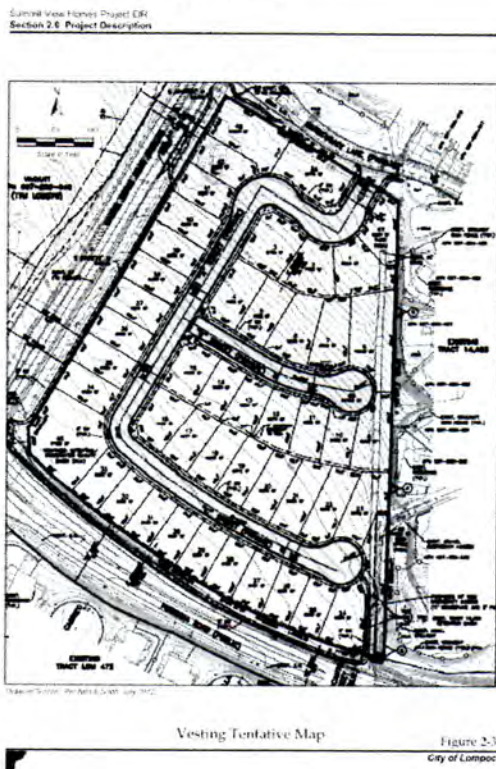


Figure 8: Proposed Summit View Layout (Source: EIR Figure 2-3)

The EIR lists five alternatives. Lane's End Residents strongly oppose the current layout and support alternative 4 with some modifications. Alternative 4 includes a reduction from 44 to 33 homes. We endorse the reduction to 33 homes but the resulting home density remains significantly higher than the surrounding developments. We also request all homes be limited to one story with building heights of no more than 18ft as mentioned above. We strongly urge the addition of the 100ft wide green belt along the shared boundary of Lane's End and Summit View as described above.

11.12

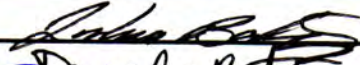
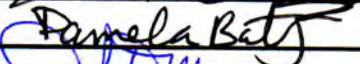
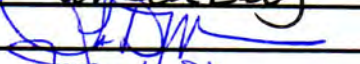

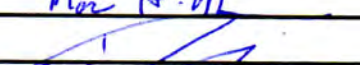
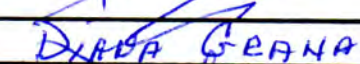


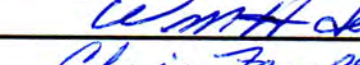



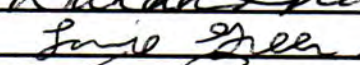

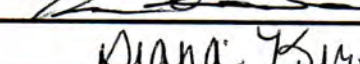
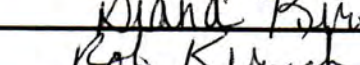
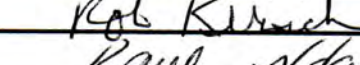


**Summary:**

Lane's End Residents ask that our concerns be addressed and mitigated appropriately through re-design of the current proposed Summit View development to include:

- 1) Move Summit View primary access road to La Purisma or Harris Grade Rd to avoid co-utilization of Gardengate Lane
- 2) Design and construct a 100ft wide green belt between Lane's End and Summit View
- 3) All Summit View homes should be one-story with 18ft height restriction
- 4) Implement a modified alternative 4 with reduced number of homes on larger lots to reduce lot density and conform to surrounding developments

11.13

**Residents:**

Joshua Baltz	
Pamela Baltz	
Lisa D. Mitchell	
Marc Mitchell	
Barbra Trousche	
Diana Graham	
DENNIS GRAHAM	
William H Johnson	
Chris FANELLO	
ANTHONY PARETTI	
Wanda GREEN	
LONNIE GREEN II	
Keith Iman	
Diana Kirsch	
Rob Kirsch	
RAUL ALDAMA	
Esther S Aldama	
DENISE Beach	
Gregorio Martinez	

*Letter 11*

**COMMENTER:** Lane's End Homeowners, Private Citizens

**DATE:** January 26, 2013

**RESPONSE:**

Response 11.1

The commenter summarizes various concerns with the EIR and lists specific requests regarding project design. These items are detailed later in the comment letter. Specific responses to these concerns are provided below.

Response 11.2

The commenter states that the EIR did not address impacts to existing views from existing homes and expressed concern regarding decreased home values. Please note, CEQA Guideline 15131 states that economic effects of a project shall not “be treated as significant effects on the environment”, and therefore the EIR does not consider economic impacts in the analysis. In addition, CEQA requires an analysis of impacts to public views and public scenic resources, not private views. As a result, the EIR analysis focuses on impacts to public views from Purisima Road and Harris Grade Road, as well as impacts to scenic resources as designated by the City of Lompoc General Plan.

The project site is zoned by Santa Barbara County for residential development. The proposed project is consistent with the intended land use for the site and would result in a similar density as currently allowed by existing zoning (4.4 units/acre). Proposed structures would range between a maximum of 20 and 24 feet in height. The proposed project would be required to adhere to the City's Architectural Review Guidelines regarding views and obstructions. The City's Architectural Review Guidelines, which are codified in Section 17.104.050 of the Lompoc Zoning Ordinance, include the various guidelines which would further reduce impacts. Architectural character/building design standards include considerations relative to neighborhood compatibility, residential infill development, views and obstructions, exterior colors, materials, lighting, and accessory equipment. Nevertheless, this comment will be forwarded to City decision-makers for their consideration.

Response 11.3

The commenter provides various options for additional mitigation for the proposed project to minimize aesthetic impacts, such as height requirements, siting requirements, and massing requirements. As noted above, CEQA requires an analysis of impacts to public views and public scenic resources, not private views. As a result, the EIR analysis focuses on impacts to public



views from Purisima Road and Harris Grade Road, as well as impacts to scenic resources as designated by the City of Lompoc General Plan. The City's Architectural Review Guidelines, which are codified in Section 17.104.050 of the Lompoc Zoning Ordinance, regulate such features of a project. Architectural character/building design standards include considerations relative to neighborhood compatibility, residential infill development, views and obstructions, exterior colors, materials, lighting, and accessory equipment. Nevertheless, these mitigation requests will be forwarded to decision makers for their consideration.

#### Response 11.4

The commenter requests the construction of 100-foot wide greenbelt as an element of the proposed project. Please note that the proposed project would provide a 30-foot buffer from the property line. This would provide an effective buffer of approximately 50-feet from the nearest existing structure in the Lane's End subdivision to the nearest structure in the Summit View Homes subdivision. Please note that the EIR evaluates the project as proposed, as well as a range of reasonable alternatives that would meet most of the project objectives and reduce impacts. Since effects on private views and privacy are not considered an impact under CEQA, evaluation of an alternative that provides a larger buffer is not warranted in this context. Nevertheless, this request will be forwarded to City decision-makers for their consideration.

#### Response 11.5

The commenter states that Santa Barbara County development standards require multiple ingress/egress points for areas with 30 or more homes located in a high fire hazard area and requests that the primary access point be relocated to Purisima Road. The precise language of Santa Barbara County Development #1(L)(1) states that for "subdivisions involving five or more lots [in high or very high fire hazard area], two routes of ingress and egress shall be required to provide emergency access unless alternate mitigation is provided by the applicant and approved by the fire chief or his designee." Please note the proposed project would be annexed into the City of Lompoc and therefore Santa Barbara County development standards would not apply. The Lompoc Fire Department would serve the project site. The Lompoc Fire Department has reviewed the proposed project and has not identified a concern with regard to emergency access. The proposed project would include a secondary emergency access point from Purisima Road, as shown on Figure 2-3 in Section 2.0 *Project Description*.

Regarding revisions to the access way from Garden Gate Lane to Purisima Road, please note that the proposed project site is legally entitled to use Garden Gate Lane for access to the project site through an easement granted to the subject property by St. Mary's Episcopal Church.

The commenter asks whether the access road will be maintained by the City of Lompoc or Lane's End Housing Association. As a condition of the easement granted by St. Mary's



Episcopal Church, the property owners of Summit View would be responsible for joint maintenance of Garden Gate Lane.

The commenter requests that construction equipment enter from Harris Grade Road or Purisima Road. As noted above, primary access will be provided by Garden Gate Lane. Construction equipment entering from Harris Grade Road or Purisima Road would cause hazardous conditions for daily drivers, as these roads provide no ingress/egress points or turnouts for construction equipment and would be spaced close to the intersection of Harris Grade Road/Purisima Road. In such a scenario, construction equipment would be required to slow and stop in the right hand lanes of Purisima Road and Harris Grade Road.

#### Response 11.6

The commenter requests the timeframe for “peak hour” traffic as discussed in the traffic study prepared for the proposed project and whether the traffic study reflects traffic volumes associated with the existing church on Garden Gate Lane. Peak hour traffic is defined as the hours between 7:00 AM and 9:00 AM and 4:00 PM and 6:00 PM. The traffic counts for the traffic study were taken during both of these time periods. Figure 4.11–2 in Section 4.11 *Transportation and Circulation* of the EIR shows existing traffic volumes at the intersection of Harris Grade Road and Garden Gate Lane during peak hours. Any traffic generated by the church during these times would be reflected in these traffic volume counts and reflected in the traffic projections (existing plus project conditions). It is important to note that traffic during the peak hour reflects the time of the day when traffic volumes are highest. While the church may generate traffic on Sunday, it is at a time when roadways typically have low traffic volumes. Traffic volumes on Garden Gate Lane during the peak hour are expected to generally be higher than traffic volumes during the most heavily traveled hour on a Sunday morning. As a result, the traffic study and Section 4.11 *Transportation and Circulation* reflect a reasonable worst case scenario.

#### Response 11.7

The commenter correctly notes that left turn traffic volumes from Garden Gate Lane onto Harris Grade Road during peak hour period would increase from 20 vehicles to 43 vehicles. The commenter asks why this would only result in an increased delay of 1.3 seconds. The delay would only increase by 1.3 seconds because the additional 23 estimated vehicle trips from the project would be distributed over the peak period. Not all trips would occur at the same time, thus minimizing delay. In addition, traffic volumes along Harris Grade Road are relatively low and do not cause substantial delay when turning left from Garden Gate Lane. Please refer to the traffic volume calculations as appended to the traffic study for detailed calculations.



Response 11.8

The commenter requests that primary access to the proposed project be relocated to Purisima Road. See Response 11.5.

Response 11.9

The commenter expresses concern with regard to construction dust and requests dust control measures. The project would implement mandatory construction dust control measures. Please refer to page 4.2–9 in Section 4.2 *Air Quality* for all dust control measures that will be implemented by the project.

Response 11.10

The commenter expresses concern with the density of the proposed project and requests a reduction in density and a study to determine the average lot size and density of surrounding areas. Please note the existing zoning density of the proposed project site, as zoned by the County, is 4.6 residential units/acre. The proposed project would include a density of 4.4 residential units/acre, which is slightly lower than existing County zoning density and consistent with the definition of Low Density Residential density as established by the City of Lompoc. The permitted zoning density of the Lane's End subdivision and the subdivision to the north, as zoned by the County, is also 4.6 residential units/acre. The Lane's End subdivision was built to a density of 2.8 units per acre. While the Lane's End subdivision is built to a lower density than that proposed by the Summit View project, both densities fall within the definition of Low Density Residential.

Response 11.11

The commenter expresses support for Alternative 4, as described in Section 6.0 *Alternatives* of the EIR. Comment noted. The commenters requests various modifications to Alternative 4, such as an 18 foot height limits and a 100-foot buffer. As noted above, CEQA requires an analysis of impacts to public views and public scenic resources, not private views. The City's Architectural Review Guidelines, which are codified in Section 17.104.050 of the Lompoc Zoning Ordinance, include various guidelines that regulate such features of a project. Nonetheless, these requests will be forwarded to decision makers for their consideration.

Response 11.12

The commenter summarizes previous comments. See previous responses.





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January 24, 2013

Santa Barbara  
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West Coast Housing Partners, LLC  
Whitt Hollis – Director of Land Acquisition  
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- Structural Engineering
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**Subject: Draft Environmental Impact Report Comments  
For Summit View Homes in Lompoc, California  
LOM 594, APN 097-250-034**

Dear Whitt,

The purpose of this letter is to provide our comments on the Draft Environmental Impact Report (DEIR) prepared by Rincon Consultants for the subject project and dated December, 2012. Our review included sections 2.0-2.7, 4.7, and 4.10. Our comments and suggested changes are as follows:

Page 2-4, Table 2-1: This table indicates that the project would be served by Lompoc City Electric once it is annexed. On page 4.10-10, however, there is discussion of PG&E regarding electrical service to the project site with no mention of Lompoc City Electric. These sections should be consistent with each other.	12.1
---	------

Page 2-5, Table 2-2: This table indicates that there are 2.79 acres of "roads/parking/walkways". Lot 46 of the tentative map, which encompasses all roads and sidewalks as well as landscaped parkways, is only 2.24 acres. This acreage should be verified.	12.2
--	------

Page 2-5, Table 2-2: The table indicates that there are 88 garage spaces for parking. It could be noted that there will also be room for two vehicles in each driveway as well as on-street parking.	12.3
--	------

Page 2-7, 2 <sup>nd</sup> para.: Request to change "Runoff would also be collected <b>from</b> an existing 24-inch RCP" to "Runoff would also be collected <b>by</b> an existing 24-inch RCP".	12.4
--	------

Page 2-7, 3<sup>rd</sup> bullet point: Request to change “American Disability Act (ADA) Compliant pedestrian **ramps** would be added.” to “**An Americans with** Disability Act (ADA) Compliant pedestrian **ramp** would be added.” | 12.5

Page 2-7, last para.: Request to change “No import or export of soils is **required.**” to “No import or export of soils is **expected.**” | 12.6

Page 4.7-6, 2<sup>nd</sup> full para.: Request to change “**design** approval” to “**project** approval” (two instances). | 12.7

Page 4.10-8, Water Supply: The DEIR states that the project is within the Mission Hills Community Services District (MHCSD) sphere of influence but not the MHCSD service area. According to the 2005 Sewer and Water Master Plan Update for MHCSD the project site is within the service area and has been analyzed in that document for 46 residential units. | 12.8

Please feel free to contact me if you have any questions about these comments to the project DEIR.

Very truly yours,

PENFIELD & SMITH



(Guy) Geremy Salts, PE

Principal Engineer





*Letter 12*

COMMENTER: Jeremy Salts PE, Principal Engineer, Penfield & Smith

DATE: January 24, 2013

RESPONSE:

Response 12.1

The commenter notes that the project would be served by City of Lompoc Electric upon annexation, not PG&E. In response to this comment, the following revisions have been made.

The paragraphs on page 4.10-10 in Section 4.10 *Public Services and Utilities* have been revised as follows:

~~Pacific Gas & Electric (PG&E) provides electrical service throughout central and northern California. PG&E utilizes a variety of energy sources to generate electricity, including natural gas, nuclear energy, renewable energy, and hydroelectric plants. PG&E maintains a large network of transmission and distribution infrastructure throughout the area in order to provide electrical power and service to its customers. On an average day, PG&E provides power and natural gas to approximately 15 million people in a 70,000 square-mile service (Pacific Gas & Electric, August 2012). In 2010, 71% of California's electricity supply came from within the state, while 21% came from the Southwest and 8% came from the Pacific Northwest (California Energy Commission, August 2012). Currently, there is no electricity demand from the project site.~~

The City of Lompoc owns its electrical utility. The City of Lompoc would provide electricity to the proposed project site. Lompoc Electric provides standard electrical service to residential, commercial and industrial land uses within the City. The electricity is comprised of multiple sources, including renewable sources. Lompoc Electric is close to meeting the renewable energy goal set by Governor Arnold Schwarzenegger of 33 percent by the year 2020. The City's portfolio includes approximately 31 percent renewable energy. The City of Lompoc has achieved this goal by signing a long-term contract to purchase a larger amount of geothermal-generated energy, which is primarily produced at plants in Lake County, California. In addition, the City also purchases energy generated by a dam on the Stanislaus River. As a member of the Northern California Power Agency (NCPA), the City of Lompoc owns a portion of both the Lake County plants and the dam on the Stanislaus River.

Telephone service in the City of Lompoc is provided by numerous providers, including ~~AT&T~~ Verizon and Comcast. As public utilities, ~~SCGC, PG&E,~~ and telecommunications providers are under the jurisdiction of the California Public Utilities Commission.



According to California Public Utilities Code Section 451, public utilities have an obligation to serve the public and are required by law to “furnish and maintain...service as necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” As a result, utility providers are required by law to provide service to any member of the public living within the utility’s service area who has applied for service and is willing to pay for the service and comply with the utility’s rules and regulations.

Impact statement PSU-9 10 in Section 4.10 *Public Services and Utilities* has been revised as follows:

**Impact PSU-9**      **The proposed project would require electricity, telephone, and gas service. ~~Pacific Gas & Electric~~ City of Lompoc Electric, Southern California Gas Company, and ~~AT&T~~ Verizon telephone company have adequate capacity to provide electricity, phone, and gas to the proposed project site. Therefore, impacts would be Class III, *less than significant*.**

The proposed project would include 44 residential units. Based on the average household natural gas consumption rate of 5,338 cubic feet per month, the proposed 44 residential units are projected to demand approximately ~~832,728~~ 234,872 cubic feet per month, or ~~234,872~~ 2,818,464 cubic feet per year of natural gas. In addition, based on the average household electrical consumption factor of 5626.5 kilowatt hours (kWh) per residential dwelling unit per year, ~~156~~ 44 residential units would demand approximately 247,556 kWh or 0.25 megawatt hours (mWh) per year.

Although the proposed project would create additional demands on natural gas, telephone, and electricity supplies and distribution infrastructure, these demands would be within the service capabilities of ~~AT&T Verizon~~ (~~AT&T, 2012~~ Verizon, 2013), Southern California Gas (Spencer, 2012) and City of Lompoc Electric (Fabing, Lompoc Utility Department, 2012). ~~PG&E (Zinakorjian, 2012)~~. As such, the project would not require major new sources of natural gas or electricity such that new or expanded gas or electricity power plants would be required. Natural gas distribution pipelines required to serve the project would need to be installed on-site. The installation of these pipelines would be the responsibility of the applicant. Similarly, electrical infrastructure would need to be installed on-site to serve the project. The installation of this infrastructure would be the responsibility of the applicant. These on-site utilities would be constructed as a part of the proposed project. The environmental impacts of the proposed project are discussed throughout this EIR. Therefore, the proposed project would have less than significant impacts on natural gas, telephone and electricity supply and infrastructure.



Response 12.2

The commenter notes that Lot 46, which includes all parking, walkways and roads totals 2.24 acres not 2.79 acres as shown in Table 2-2. Please note that the calculation of 2.79 acres of roads/parking/walkways includes the existing secondary emergency access road on the project site, in addition to the proposed improvements.

Response 12.3

The commenter suggests including additional information pertaining to parking. In response to this comment, the following revisions have been made to Table 2-2 in Section 2.0 project description.



**Table 2-2  
Proposed Summit View Project Summary**

Lot Size	10.05-acres
Residential Units	44
Lot Access	Garden Gate Lane at the north of the project site.
Density	4.4 units per acre
Project Footprint	Building coverage: 2.39-acres (based on preliminary architectural design) Roads/Parking/Walkways: 2.79-acres Landscaping: 4.1-acres Open Space: 0.77-acres <b>TOTAL: 10.05-acres</b>
Parking	88 in garage spaces <u>(in addition to two spaces in each driveway)</u>
Community Amenities	Pedestrian connectivity and walkability On-site open space recreational area

Response 12.4

The comment requests minor changes to language describing the proposed stormwater system. In response to this comment, the second paragraph on page 2-7 in Section 2.0 Project Description has been revised as follows:

Stormwater Infrastructure. One of the open space lots on the southwest corner of the project site would be used for stormwater detention and infiltration, refer to Figure 2-4 *Proposed Drainage Plan*. Stormwater runoff would be detained in this basin to reduce peak runoff levels at or below those of the undeveloped site condition. The basin would have a total volume of approximately 20,000 cubic feet and would be constructed of graded earth with 4:1 side slopes and a concrete spillway for overflow. Stormwater runoff from the project site would be collected in an existing 21-inch reinforced concrete pipe (RCP) culvert, at the southwest corner of the property that is currently conveyed under Purisima Road to the south and would continue in a culvert under Highway 1 to the west, eventually leading to the Santa Ynez River. Runoff would also be collected ~~from~~ by an existing 24-inch RCP culvert, and conveyed under Harris Grade Road and Highway 1, eventually leading to the Santa Ynez River.

Response 12.5

The comment requests minor changes to language describing the stormwater system. In response to this comment, the third bullet point on page 2-7 in Section 2.0 *Project Description* has been revised as follows:

- At the intersection of Harris Grade Road and Purisima Road: An Americans with Disability Act (ADA) compliant pedestrian ramps would be added. Also, an existing grated inlet with a curb opening catch basin would be replaced.



Response 12.6

The commenter requests that the language regarding exports of soil in Section 2.0 *Project Description* changed from not “required” to not “expected”. It is important to note that the EIR relied upon the assumption that no soil exports would occur. In response to this comment, the last paragraph on page 2-7 in Section 2.0 *Project Description* has been revised as follows:

Initial subdivision improvements, including the construction of roadways, utility infrastructure and drainage improvements would be constructed in a single phase upon approval of the project. No import or export of soils is ~~required~~ proposed. The development of residences would proceed based upon market demand.

Response 12.7

The commenter requests that the language on page 4.7-6 in Section 4.6 *Hydrology and Water Quality* be changed from “design” approval to “project” approval. Please note the use of the term “design” is intended in this statement as it refers to the design of the proposed drainage system, not project approval.

Response 12.8

The commenter correctly notes that the project site is within the Mission Hills Community Service District service area. In response to this comment, the second paragraph in Section 4.10 *Public Services and Utilities* has been revised as follows:

f. **Water Supply.** The Mission Hills Community Services District (MHCS D) would provide water services to the project. ~~The project site is within the MHCS D sphere of influence, though it is not currently within the MHCS D service area.~~



**NATIVE AMERICAN HERITAGE COMMISSION**

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SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
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STATE CLEARING HOUSE

Letter 13

December 18, 2012

Ms. Lucille T. Breese, AICP, Planning Manager

**City of Lompoc Community Development Department**

100 Civic Center Plaza  
Lompoc, CSA 93438

Re: SCH#2012071088 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Summit View Homes Project;" located in the City of Lompoc; Santa Barbara County, California

Dear Ms. Breese:

The California Native American Heritage Commission (NAHC) is the State of California 'trustee agency' for the preservation and protection of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously.

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r ).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural

13.1

significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254( r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

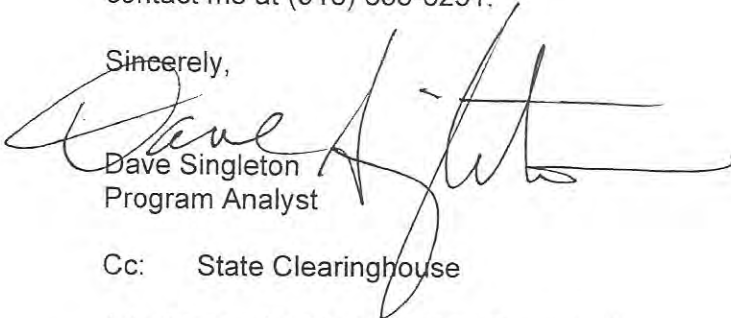
Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List



***Letter 13***

**COMMENTER:** Dave Singleton, Native American Heritage Commission

**DATE:** December 18, 2013

**RESPONSE:**

Response 13.1

The commenter summarizes various regulations pertaining to Native American cultural resources. The project has complied with these regulations as applicable. The lead agency (the City of Lompoc) has performed SB 18 consultation with applicable tribes so as to involve tribes early in the planning process. In addition, a Phase I and Extended Phase I Cultural Resource Evaluation were prepared for the proposed project. As discussed under Impact CR-1 in Section 4.4 *Cultural Resources*, the project would not impact known cultural resources, and is unlikely to impact unknown cultural resources.

