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SEP 9 2005

CITY OF LOMPOC
PLANNING DIVISION

Lompoc Valley Seed and Milling Company
1119 West Laurel Ave.
Lompoc, CA 93436

September 8, 2005

Keith C. Neubert
Planning Division, Community Dev. Dept.
P.O. Box 8001
Lompoc, CA 93438

Re: Crown Laurel Project

Dear Sir:

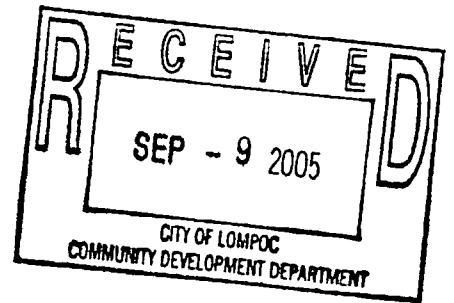
As a business owner near the proposed project, I am opposed to the Zoning Change. A residential complex in this area will have an adverse affect on already established businesses.

I urge you to deny this project.

Sincerely,



Bob Campbell



Lompoc Warehouse Corporation
1119 West Laurel Ave.
Lompoc, CA 93436

September 8, 2005

Keith C. Neubert
Planning Division, Community Dev. Dept.
P.O. Box 8001
Lompoc, CA 93438

Re: Crown Laurel Project

Dear Sir:

As a property owner near the proposed project, I am opposed to the Zoning Change. A residential complex in this area will have an adverse affect on already established businesses.

I urge you to deny this project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Merle Manfrina".

Merle Manfrina

Telephone 736-2517
1119 West Laurel Avenue
Lompoc, California 93438

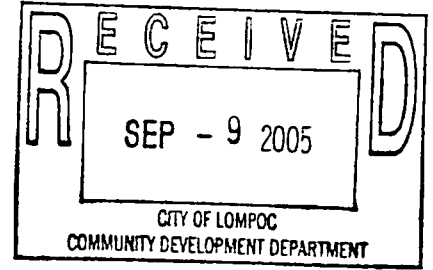
LOMPOC WAREHOUSE CORPORATION

MODERN BEAN CLEANING AND WAREHOUSING

SEPTEMBER 7, 2005

KEITH C. NEUBERT
PLANNING DIVISION

RE: CROWN LAUREL PROJECT



LOMPOC WAREHOUSE CORPORATION, LOCATED AT 1119 WEST LAUREL AVE.,
IS OPPOSED TO THE CHANGES FOR DEVELOPMENT.

WE ARE IN A ESTABLISHED COMMERCIAL AREA DOING BUSINESS AND FEEL
IT IS NOT AN APPROPRIATE AREA FOR BUILDING A HOUSING DEVELOPMENT.

SINCERELY

LOMPOC WAREHOUSE CORPORATION

JOHN A SILVA, SECRETARY



Rincon Consultants, Inc.

Environmental Scientists Planners Engineers

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Date: September 14, 2005

To: Lucille Breese, City Planner

Organization: City of Lompoc

From: Richard Daulton, Planning Manager

Email: rdaulton@rinconconsultants.com

cc: Keith Neubert, Assistant Planner

Re: Responses to Comments Regarding the Crown Laurel Project Draft Mitigated Negative Declaration

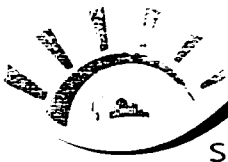
This memorandum provides responses to comments issued by three public commentors on the Crown Laurel Project Draft Mitigated Negative Declaration (MND). Note that these responses are not required pursuant to the California Environmental Quality Act (CEQA), but are rather intended to provide clarification for City staff regarding the issues raised in these comment letters.

The City received public comment letters from John A. Silva, Secretary, Lompoc Warehouse Corporation (September 7, 2005), Merle Manfrina, Lompoc Warehouse Corporation (September 8, 2005), and Bob Campbell, Lompoc Valley Seed and Milling Company (September 8, 2005), regarding the Draft MND. Each of the comment letters expressed opposition to the proposed land use change to allow residential uses on the site, and stated the opinion that the residential portion of the proposed project would result in an adverse affect on existing businesses.

The project's environmental impacts related to land use conflicts are described in Items III: *Air Quality*, IX: *Land Use and Planning*, and XI: *Noise*, of the Draft MND. As described therein, the proposed residential component would result in significant but mitigable land use conflicts related to temporary construction nuisances and affects on the visual environment (i.e., lighting overspill), and less than significant impacts related to noise from project-generated vehicle trips. In addition, implementation of the residential portion of the project would result in the exposure of future project residences to environmental nuisances, such as odors and noise, generated by industrial land uses on-site and in the project area. Required mitigation includes the provision of a written disclosure statement in the CC&R's for the residential component that shall make all prospective property

owners on the site aware that although potential impacts or discomforts between proposed industrial uses may be lessened by proper maintenance, some level of incompatibility between the two uses would remain. Additionally, implementation of required mitigation measures, including installation of a noise-insulated wall as the rear wall of the proposed industrial condominiums, and shielding of external noise-generating equipment from adjacent residential uses, would reduce impacts related to the exposure of project residents to industrial noise to a less than significant level.

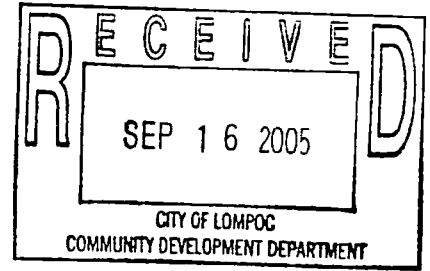
It should be noted that Section 15131, *Social and Economic Effects*, of the State CEQA Guidelines, states that although economic or social information may be included in an MND, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, a discussion of the economic impacts of the project is not included in the MND.



Santa Barbara County
Air Pollution Control District

September 8, 2005

Keith C. Neubert
Planning Division
Community Development Department
P.O. Box 8001
Lompoc, CA 93438-8001



RE: Lompoc Crown Laurel Mixed Use Project: Mitigated Negative Declaration

Dear Mr. Neubert,

The Santa Barbara County Air Pollution Control District (APCD) has reviewed Mitigated Negative Declaration for the above-mentioned project.

In general, we are concerned that the potential impacts of introducing residential development adjacent to an existing industrial area have not been addressed adequately in the MND. The project is inconsistent with the Clean Air Plan (the proposal to rezone from industrial to residential is an intensification of use in terms of associated traffic). Inconsistency with the Clean Air Plan is a potentially significant impact.

The MND contains no analysis of the potential impacts to residents from the existing industrial uses. We are also concerned with the statement in the MND that any new pollution sources in the commercial condominiums, which comply with federal, state and local regulations, will have an insignificant impact on the residents. Residual impacts must be discussed. The APCD would like to see all calculations and modeling documentation included in an appendix in order to substantiate the conclusions in the MND.

Specific comments

Page 16, 1st paragraph. The document states, "Effective January 9, 1998, Santa Barbara County was classified as a "serious" ozone nonattainment area by the EPA". Please delete this sentence. As noted in the same paragraph, Santa Barbara County is in attainment for all federal standards.

Page 16, 2nd paragraph, last sentence. Since this paragraph discusses Construction and Demolition impacts, please delete the statement that the APCD has set a 25-pound per day threshold for ROC and NO_x. As noted in the next paragraph in the MND there are no quantitative thresholds of significance for construction emissions.

Page 16, 3rd paragraph. The MND states that emissions from construction equipment during rough grading "are not anticipated to be substantial" and "... would produce cumulatively insubstantial amounts of ozone precursors". Although there are no short-term air quality emission thresholds in place currently, the APCD recommends mitigation measures during

project grading and construction to reduce fugitive dust and to control NO_x emissions from construction equipment as listed in the MND.

The document should note that any demolition or renovation of the existing structures will require the filing of separate *Asbestos Notification Forms* for each structure, with the APCD which will ensure APCD oversight of the demolition and compliance with federal regulations.

As correctly noted in the MND, APCD permits are required for stationary sources of air pollution. The MND correctly examined the air quality effects of emissions from sources such as solvent use, new boilers, generators and other equipment associated with such a project under a reasonable worst case scenario. We would like to see all calculations included in an appendix in order to check if the conclusions are correct.

Page 19, 1st paragraph. The MND states that there is a "Final Traffic and Circulation Study" prepared for the project. It is important that the average daily trips estimated by the traffic study were used in the URBEMIS model to estimate the air quality emissions.

Page 19, 2nd paragraph. We note that there are adjacent residences and 2 schools which will be affected by the project construction. Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. Therefore, construction should be timed to occur during the summer when students are not present. The following is an updated list of best available control strategies that should be implemented to the maximum extent feasible.

- Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) should be utilized wherever feasible.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction equipment shall be maintained in tune per the manufacturer's specifications.
- Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All diesel-powered equipment shall use ultra low sulfur diesel fuel.
- Diesel catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed, if available.

- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- Idling of heavy-duty diesel trucks during loading and unloading should be limited to five minutes; auxiliary power units should be used whenever possible.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

These measures shall be shown on grading and building plans and shall be adhered to throughout grading and construction activities. City inspectors shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors are required to respond to public nuisance complaints.

Page 19, Findings and Mitigation #1. The MND states that some level of incompatibility between the proposed residential uses and industrial uses would remain. Localized air pollution impacts from incompatible land use can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes. Cumulative air pollution impacts can occur from a concentration of multiple sources that individually comply with air pollution control requirements or fall below risk thresholds, but in the aggregate may pose a public health risk to exposed individuals. These sources can be heavy or light-industrial operations, commercial facilities such as autobody shops, large gas dispensing facilities, dry cleaners, and chrome platers, and freeways or other nearby busy transportation corridors. By separating incompatible land uses, land use agencies can prevent or reduce both localized and cumulative air pollution impacts without denying what might otherwise be a desirable project. For instance:

- a dry cleaner could open a storefront operation in a community with actual cleaning operations performed at a remote location away from residential areas;
- gas dispensing facilities with lower fuel throughput could be sited in mixed-use areas;
- enhanced building ventilation or filtering systems in schools or senior care centers can reduce ambient air from nearby busy arterials; or
- landscaping and regular watering can be used to reduce fugitive dust at a building construction site near a school yard.

Page 19, Findings and Mitigation #2. We concur with this mitigation and would like to see the information included in an "Odor Abatement Plan". OAPs should include the following elements:

- a) Name and telephone number of contact person(s) at the facility responsible for logging in and responding to odor complaints.

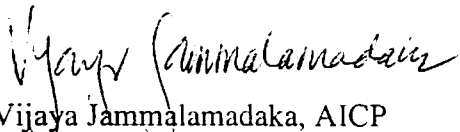
- b) Policy and procedure describing the actions to be taken when an odor complaint is received, including the training provided to the staff on how to respond.
- c) Description of potential odor sources at the facility.
- d) Description of potential methods for reducing odors, including minimizing idling of delivery and service trucks and buses, process changes, facility modifications and/or feasible add-on air pollution control equipment.
- e) Contingency measures to curtail emissions in the event of a public nuisance complaint.

Wood-burning fireplaces are the cause of many public nuisance complaints that the APCD receives during the winter months. We recommend that only gas fireplaces be allowed in the new residences.

In conclusion, the APCD would like to see a more thorough discussion of potential air quality impacts and their health effects on sensitive receptors in the environmental document.

Thank you for the opportunity to participate in the environmental review of this project. Please call me at 961-8893 or contact me by e-mail at vlj@shcapcd.org, if you have questions.

Sincerely,



Vijaya Jammalamadaka, AICP
Air Quality Specialist
Technology and Environmental Review Division

cc: Bobbie Bratz, Public Information and Community Programs Supervisor
TEA Chron File



Rincon Consultants, Inc.

Environmental Scientists Planners Engineers

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Date: September 16, 2005

To: Lucille Breese, City Planner

Organization: City of Lompoc

From: Richard Daulton, Planning Manager

Email: rdaulton@rinconconsultants.com

cc: Keith Neubert, Assistant Planner

Re: Responses to APCD Comments Regarding the Crown Laurel Project Draft Mitigated Negative Declaration

This memorandum provides responses to comments issued by the Santa Barbara County Air Pollution Control District (APCD regarding the Crown Laurel Project Draft Mitigated Negative Declaration (MND). Note that these responses are not required pursuant to the California Environmental Quality Act (CEQA), but are rather intended to provide clarification for City staff regarding the issues raised in these comment letters. Refer to the Rincon Consultants memorandum of September 14, 2005 for responses to three previous comment letters regarding the Draft MND.

The APCD comment letter, dated September 14, 2005, is attached to this memorandum. The APCD comments that raise an environmental concern and as such require a written response are included herein and are numbered sequentially. Correspondingly numbered responses to the APCD comments are provided in the paragraphs below.

Response to APCD Comment 1: Refer to Responses 2 through 14, below.

Response to APCD Comment 2: The commentor agrees with the Draft MND conclusion that the project would be inconsistent with the Clean Air Plan (CAP), which would be considered a potentially significant impact. Implementation of Mitigation Measure 4 would reduce this impact to a less than significant level. It should be noted that the medium-density residential and light industrial development under the proposed project would not exceed the level of buildout planned under the existing, heavy industrial land use designation. The proposed project would result in an overall net reduction in site development (and associated air quality impacts) when compared to what would be

allowed under the current zoning and would not result in air emissions greater than those estimated under the current zoning designation. In addition, the light industrial portion of the project would be considered a less intense use when compared to potential buildout of industrial use of the site (as is currently permitted under the existing zoning designation). The proposed project would contribute only a small fraction of emissions to the 2005 Planning Emission Inventory Forecast for the City of Lompoc and County of Santa Barbara.

Response to APCD Comment 3: The Draft MND includes an analysis of a worst-case scenario of stationary source emissions from on-site industrial uses based on field observations of existing industrial uses in the project vicinity and the relatively small size of individual proposed industrial condominiums, using U.S. Environmental Protection Agency, AP-42 Compilation of Air Pollutant Emissions Factors. As described in Item iii.b, specific tenants for the proposed on-site industrial condominiums have not been determined. The proposed industrial use condominiums are assumed to contain: 4 boilers that use bark and wet wood fuel inputs in the total amount of 500 Million British Thermal Units MMBtu per day; and fork lifts, mobile refrigeration units, generators, material handling equipment (e.g., conveyors), and pumps that use 500 Horsepower Hours (HP-HR) of energy per day. The forecasted emissions from these stationary sources are summarized in Table 3. As shown in Table 3, with these reasonable worst-case assumptions, neither stationary source nor total project emissions would exceed applicable APCD thresholds. Existing off-site industrial uses in the project area would not be expected to generate emissions that would affect future residents of the proposed residential units because of the intervening distance, regional emissions permitting, and the City's industrial zone performance standards, which regulate nuisances from industrial uses.

Response to APCD Comment 4: Page 16, 1st paragraph, has been revised as follows:

"Santa Barbara County is in attainment for all federal standards, however, the County is in non-attainment for the state ozone and PM₁₀ standards. ~~Effective January 9, 1998, Santa Barbara County was classified as a "serious" ozone nonattainment area by the EPA.~~"

Response to APCD Comment 5: Page 16, 2nd paragraph, has been revised as follows:

"PM₁₀ is comprised of finely divided solids or liquids such as dust, soot, aerosols, fumes and mists. The APCD ~~has set a 25 pound per day threshold for ROC and NO_x, but~~ does not require quantification of construction-related PM₁₀ emissions."

Response to APCD Comment 6: Mitigation measures to reduce project construction impacts related to short-term air contaminant emissions are included as Air Quality Mitigation Measure 3, on pages 19 and 20 of the Draft MND.

Response to APCD Comment 7: Project impacts related to asbestos are described in Item VII, *Hazards and Hazardous Materials*, of the Draft MND. Hazards and Hazardous Materials Mitigation Measure 1 states that: "Regardless of whether asbestos is identified in any building, prior to demolition of existing structures the APCD shall be notified and an APCD Asbestos Demolition and Renovation Compliance Checklist shall be submitted to both APCD and the City of Lompoc Planning and Building Division.

Response to APCD Comment 8: The commentor's concurrence with the conclusions of the MND regarding stationary emissions sources is noted. Refer to Draft MND Item III and Response to APCD Comment 3, above, for a discussion of the worst-case scenario assumptions for stationary source emissions.

Response to APCD Comment 9: The average daily trips evaluated in the Urbemis air emissions model directly correspond to those identified in the traffic study for the project.

Response to APCD Comment 10: Measures to reduce construction diesel exhaust emission impacts are included in Air Quality Mitigation Measure iii in the Draft MND. Implementation of these measures would reduce the identified short-term and temporary construction emissions impact to a less than significant level. The scheduling of construction activities during summer months is not required.

Response to APCD Comment 11: The commentor's statements regarding the residual incompatibility between the proposed residential uses and industrial uses, as described in the Draft MND, are noted. The proposed project would result in an overall net reduction in site development (and associated air quality impacts) when compared to what would be allowed under the current zoning and would not result in air emissions greater than those estimated under the current zoning designation. In addition, the light industrial portion of the project would be considered a less intense use when compared to potential buildout of industrial use of the site (as is currently permitted under the existing zoning designation).

Response to APCD Comment 12: The Air Quality Mitigation Measure referenced by the commentor requires that future tenants of the proposed industrial condominiums shall provide evidence of APCD permit compliance for any new applicable stationary emissions sources and written documentation that demonstrates to APCD the installation of stationary emissions control technologies or emissions reduction offset in the project area such that these methods result in emissions reductions to allowable levels. If the future tenants operate an odor-generating industrial use, then the required evidence of APCD permit compliance may include provision of an odor-abatement plan that contains the five components noted by the commentor.

Response to APCD Comment 13: Since wood-burning fireplaces in proposed residential units would not result in a significant environmental impact, a prohibition on such fireplaces has not been required of the project.

Response to APCD Comment 14: Refer to Responses 1 through 13.
