

Lompoc General Plan Update Final Environmental Impact Report Comments and Responses

State Clearinghouse No. 2008081032

GP 07-04



Prepared by:
City of Lompoc
Community Development Department

Prepared with the assistance of:
Rincon Consultants, Inc.



December 2009

**City of Lompoc
General Plan Update**

Final
**Environmental Impact Report
Comments and Responses**

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GP No. 07-04

Prepared by:

**City of Lompoc
Community Development Department
100 Civic Center Plaza
Lompoc, California 93438-8001
Contact: Ms. Lucille Breese, AICP**

Prepared with the assistance of:

**Rincon Consultants, Inc.
1530 Monterey Street, Suite D
San Luis Obispo, California 93401**

December 2009

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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 Lompoc General Plan Update and has prepared written responses to the written and verbal comments received. The DEIR was circulated for the required 45-day public review period, beginning October 12, 2009 and concluding November 25, 2009.

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 commentors and to indicate where and how the EIR addresses pertinent environmental issues. The comment letters included herein were submitted by public agencies, citizens groups, and private citizens. Responses to summarized verbal public comments at the public hearing are also provided in this document.

The Draft EIR and this Comments and Responses report collectively comprise the Final EIR for the Lompoc General Plan Update 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 comment 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 1.1)* The mitigation associated with Impact AQ-1 in Table ES-1 (page ES-6) has been modified as follows:

Transportation Control Measures (TCMs) contained in the 2007 Clean Air Plan (CAP) and listed in Table 4.2-4 would reduce overall air quality impacts to the extent feasible. However, nNo feasible mitigation measures are available that would reduce impacts to a less than significant level.

- ❖ *(Comment 7.8)* The heading for Hazards and Hazardous Materials has been added on page ES-13.

Revisions to Section 2.0. Project Description

- ❖ *(Comment 7.10)* Page 2-1 has been revised as follows:

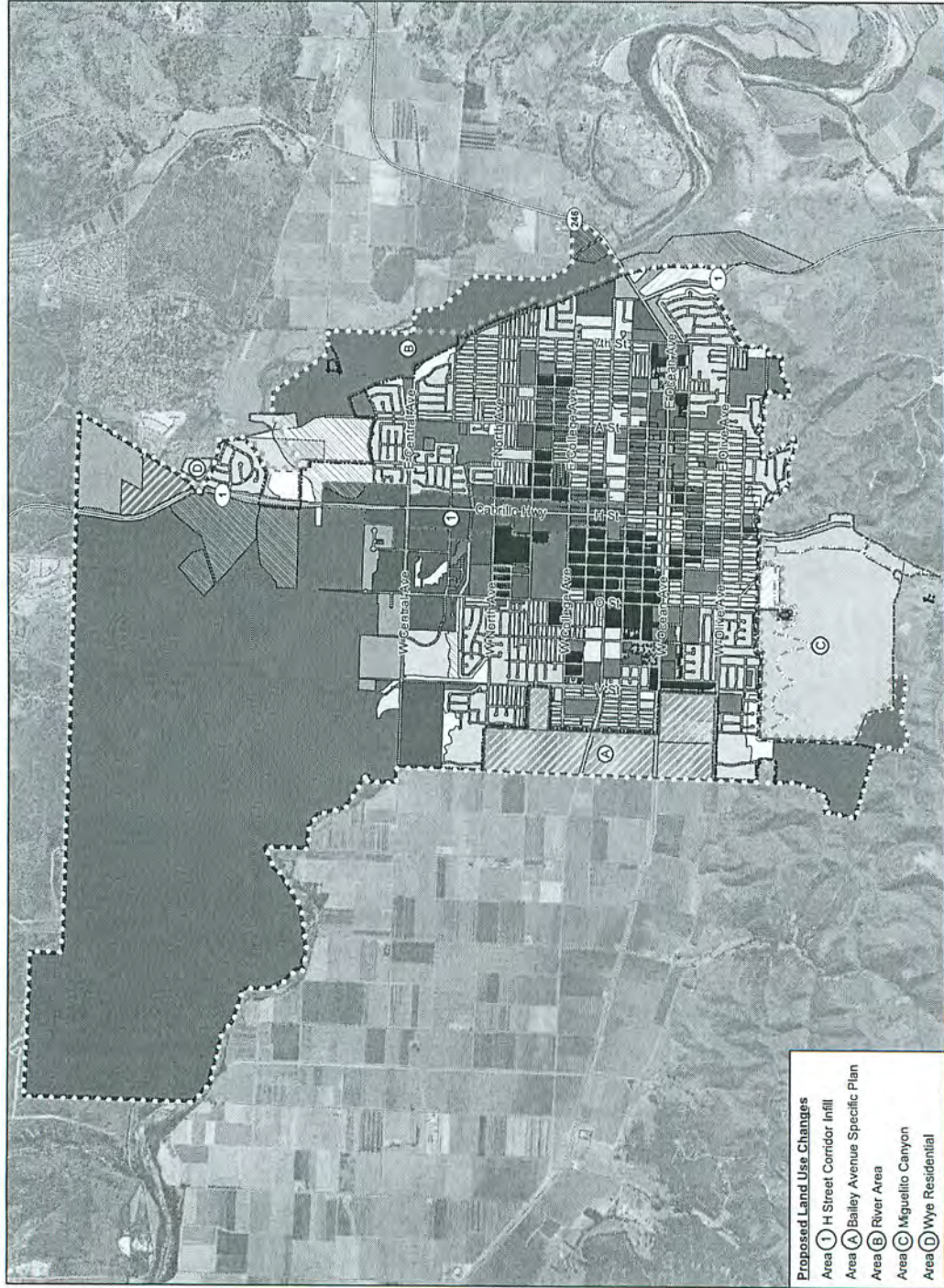
a. **Incorporated City Limits.** As of 2008, Lompoc's corporate boundaries encompass approximately 11.65 square miles, or 7,456 acres of land. The City is seeking annexation of land outside the current City limits as part of the 2030 General Plan. ~~There are three annexation areas, portions of which are located within the existing Sphere of Influence and.~~ These four possible expansion areas would be annexed over the life of the General Plan, and are described in more detail below.

- ❖ *(Comment 7.12)* The following text has been added (page 2-5):

The Lompoc City Council adopted the current General Plan in 1997. The 1997 General Plan (as amended) has since served as a policy document that guides land use decisions in the City.

- ❖ *(Comments 6.4 and 6.5)* Figure 2-4, *Land Use Map* (page 2-11), has been revised as follows (see following page):
 - Land Use designation for Miguelito Canyon (Expansion Area B) was clarified on the map as Rural Density Residential, to be consistent with the General Plan Update and the rest of the EIR.
 - The first category of Low Density Residential in the legend now specifies a density of 6.2 units per acre, to be consistent with the General Plan Update and the rest of the EIR.





Proposed Land Use Changes
 Area 1 H Street Corridor Infill
 Area A Bailey Avenue Specific Plan
 Area B River Area
 Area C Miguellito Canyon
 Area D Wye Residential

Base map source: City of Lompoc, 2008. Map images copyright © 2008 ESRI and its licensors. All rights reserved. Used by permission.

LEGEND
 H Street Corridor Infill Area
 Existing City Urban Limit Line
 Proposed Area to be Added to City Urban Limit Line
 Draft Annexation Areas (Subject to LAFCO approval)
 Existing City Limits
 Existing City Sphere of Influence
 Park Overlay

General Plan Land Use Designation
 Agriculture
 Open Space
 Business Park
 Community Facility
 General Commercial
 Neighborhood Commercial
 Office Commercial
 Old Town Commercial
 Mixed Use
 Industrial
 Specific Plan
 Rural Density Residential
 Very Low Density Residential
 Low Density Residential 6.2 Units Per Acre
 Low Density Residential 2.5 Units Per Acre
 Low Density Residential 4.5 Units Per Acre
 Medium Density Residential
 High Density Residential



Note: This is one of a series of maps and textual material which, combined, constitute the development policies of the city of Lompoc. Allowable land uses for given parcels of land cannot be determined solely by reference to this map.

Land Use Map

Figure 2-4
 City of Lompoc

- ❖ *(Comment 7.15)* The following text in Subsection 2.4.5 *Housing Element* (page 2-33), has been revised:

Based on vacant parcels throughout the City, the current land use map provides a sufficient amount of multi-family residential land use designations to meet the RHNA allocation for the 2007 to 2014 period. The City needs to provide the capacity for 516 new units to meet the RHNA allocation; the number of currently vacant parcels would accommodate up to 1,247 multi-family units (refer to Table 2-2). As such, the City would not need to designate additional land uses to meet the allocation. It should be noted that the H Street Corridor Infill area and proposed annexation areas would provide an additional 923 multi-family residential units.

Revisions to Section 4.1, Aesthetics

- ❖ *(Comment 7.16)* the following text (page 4.1-11) has been revised:

Development of this expansion area would be visible from Ocean Avenue/State Route 246, which ~~borders the site to the south~~ runs through the southern portion of the site, and Floradale Avenue, which is located approximately ½ mile from the site's western boundary (refer to Figure 4.1-1).

- ❖ *(Comment 7.28)* All references to "La Purisima Road" have been changed to "Purisima Road", in Sections 4.1, *Aesthetics*, 4.6, *Hazards and Hazardous Materials*, and 4.14, *Utilities and Service Systems*.

Revisions to Section 4.2, Air Quality

- ❖ *(Comment 1.2)* Table 4.2-2 (page 4.2-6) has been modified as follows:

**Table 4.2-2
 Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Ozone	0.075 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg) 20.0 ppm (1-hr avg)
Nitrogen Dioxide	0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.03 ppm (annual avg)
Sulfur Dioxide	0.03 ppm (annual avg) 0.14 ppm (24-hr avg) 0.5 ppm (3-hr avg)	0.04 ppm (24-hr avg) 0.25 ppm (1-hr avg)



**Table 4.2-2
 Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Lead	1.5 µg/m ³ (calendar quarter) 0.15 µg/m ³ (rolling 3-mo avg)	1.5 µg/m ³ (30-day avg)
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr avg)	20 µg/m ³ (annual avg) 50 µg/m ³ (24-hr avg)
Particulate Matter (PM _{2.5})	15 µg/m ³ (annual avg) 35 µg/m ³ (24-hr avg)	12 µg/m ³ (annual avg)
Visibility Reducing Particles	n/a	<u>Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more due to particles when relative humidity is less than 70 percent (8-hr avg)</u>
Sulfates	n/a	<u>25 µg/m³ (24-hr avg)</u>
Hydrogen Sulfide	n/a	<u>42 µg/m³ (1-hr avg)</u>
Vinyl Chloride	n/a	<u>26 µg/m³ (24-hr avg)</u>

ppm= parts per million

µg/m³ = micrograms per cubic meter

Source: California Air Resources Board, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, November 2008.

- ❖ (Comment 1.3) Section 4.2.1(b), *Local Regulatory Framework* (page 4.2-7), has been updated to include this information as follows:

The United States is currently using a voluntary and incentive-based approach toward emissions reductions in lieu of the Kyoto Protocol's mandatory framework. To date, the USEPA has not regulated GHGs under the Clean Air Act. However, the U.S. Supreme Court in *Massachusetts v. EPA* (April 2, 2007) held that the USEPA can, and should, consider regulating motor-vehicle GHG emissions. The USEPA has not yet promulgated federal regulations limiting GHG emissions. ~~The USEPA in December 2007 denied California's request for a waiver to directly limit GHG tailpipe emissions, which prompted a suit by California in January 2008 to overturn that decision.~~ On June 30, 2009, the USEPA granted California's request for a waiver to directly limit GHG tailpipe emissions for new motor vehicles beginning with the current model year.

- ❖ (Comment 1.4) The following text has been modified in Section 4.2.1(b), *Local Regulatory Framework* (page 4.2-8):

Senate Bill (SB) 375, signed in August 2008, requires the inclusion of sustainable communities' strategies (SCS) in regional transportation plans (RTPs) for the purpose of reducing GHG emissions. The bill requires ARB to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles,



for 2020 and 2035. On January 23, 2009 ARB appointed a Regional Targets Advisory Committee (RTAC) to provide recommendations on factors to be considered and methodologies to be used in the ARB target setting process, as required under SB 375. The Committee must provide its recommendations in a report to ARB by September 30, 2009. The RTAC final report, issued on September 30, 2009, recommended “ambitious but achievable” targets, with a substantial emphasis on improving home affordability (rents and mortgages) near job centers as a means to reduce driving. The California Air Resources Board will set the final targets by September 30, 2010.

Local Regulations and CEQA Requirements. GHG emissions contributing to global climate change have only recently been addressed in CEQA documents, such that CEQA and case law do not provide guidance relative to their assessment. The State of California, or any particular air pollution control district, including the SBCAPCD, has not adopted quantitative significance thresholds for this topic. The Office of Planning and Research (OPR) is directed under Senate Bill 97 to prepare, develop and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions through CEQA by July 1, 2009. Those guidelines may recommend thresholds, but no adopted thresholds are available at this time. Pursuant to the requirements of Senate Bill 97, the Office of Planning and Research (OPR) released draft guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions through CEQA in April 2009. The draft guidelines do not include quantitative emissions thresholds. The California Resources Agency (Resources Agency) will certify and adopt amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions or the effects of GHG emissions implementing the draft guidelines, on or before January 1, 2010, pursuant to SB 97 (Dutton, 2007). These updated *CEQA Guidelines* will provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents. In the interim, OPR completed a Technical Advisory in June 2008 for addressing climate change in CEQA documents to guide the structure of climate change analysis. In combination, the SBCAPCD suggests the use of the methodologies contained in the California Air Pollution Control Officers Association [CAPCOA] (January 2008) *CEQA and Climate Change* white paper to assess GHG emissions.

- ❖ (Comment 1.5) Section 4.2.1(c), *Current Ambient Air Quality* (page 4.2-9), has been updated as follows:

c. **Current Ambient Air Quality.** The SBCAPCD monitors air pollutant levels to assure that air quality standards are met, and if they are not met, to also develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, the air basin is classified as being in “attainment” or as “non-attainment.” The SCCAB, in which the General Plan area



is located, is in non-attainment for the state eight-hour ozone standard, the state standard for PM₁₀, and the federal standard for PM₁₀. ~~There is not yet enough data to determine the basin's attainment status for either the federal standard for PM_{2.5} or the state standard for PM_{2.5}.~~ On October 5th, 2009, the USEPA issued area designations for the 2006 24-hour national air quality standard for PM_{2.5}. Santa Barbara County is in attainment for the national standard for PM_{2.5}. The County is in attainment for all other standards.

- ❖ *(Comment 1.6)* Section 4.2.1(c), *Current Ambient Air Quality* (page 4.2-10), has been updated as follows

Table 4.2-3 summarizes the annual air quality data for the City of Lompoc's local airshed, collected at the Lompoc-S H Street station, located at South H Street and Ocean Avenue. The ARB maintains over 60 air quality monitoring stations throughout California, including the Lompoc-S H Street station, ~~located at South H Street and Ocean Avenue.~~ The data collected at this station is considered to be generally representative of the baseline air quality experienced in the General Plan area.

- ❖ *(Comment 1.8)* Under Impact AQ-4 in Section 4.2, *Air Quality*, the discussion of General Plan Policies which Reduce Impacts (page 4.2-38) has been updated as follows:

The 2030 General Plan Land Use Element (LUE) includes policies specifically intended to reduce impacts from future growth in Lompoc, which would indirectly reduce GHG emissions. These policies include LUE Policies 1.7 and 5.4 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). In addition, the Circulation Element (CE) includes policies which target reductions in air pollutant emissions through circulation design factors and compliance with applicable laws and regulations, which would also serve to reduce air pollutants, including GHGs. These policies include CE Policies 3.1 through 3.3, 3.5 through 3.9, 3.12, and 3.13 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). The existing 1997 General Plan Resource Management Element (RME) also includes policies which would reduce emissions through coordination between the City and SBCAPCD, as well as circulation design factors and compliance with applicable laws and regulations. These policies include RME Policies 7.1 through 7.4, 7.6, 8.1, and 8.2 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). In addition, the following Housing Element Goals and Policies and additional LUE Policy would reduce emissions, including GHG emissions.

HE Goal 4 Maximize energy efficiency in existing and future residential development.



HE Policy 4.1 The City shall continue to encourage the design and installation of energy conservation, water conservation, and solid waste reduction measures in all construction and rehabilitation projects.

HE Policy 4.2 The City shall provide financial and technical assistance based upon the availability of funding to property owners who desire to improve energy and water efficiency of their housing units but are unable to afford improvement costs.

HE Policy 4.3 The City shall encourage the use of active and passive solar energy in the design of all new construction projects.

HE Policy 4.4 The City shall consider the development of green building standards for possible application to new residential development, including affordable housing.

LUE Policy 2.4 The City shall encourage creative and efficient site designs in residential developments which address natural constraints, promote energy efficiency and overall sustainability, protect aesthetic qualities, and maintain neighborhood character.

Revisions to Section 4.3, Biological Resources

❖ (Comment 3.1) Table 4.3-1 (page 4.3-10) has been revised to include the following:

**Table 4.3-1
 Sensitive Plants in the Vicinity of the Lompoc General Plan Area**

Common Name	Scientific Name	Agency Status (Federal/State/Other)	Habitat
<u>Marsh sandwort</u>	<u><i>Arenaria paludicola</i></u>	FE/SE/ CNPS List 1B	<u>Stoloniferous, perennial herb; blooms May to August; occurs in freshwater marshes and swamps, bogs and fens, and some coastal scrub, ranging from 3 to 170 meters in elevation; common associates include Typha, Juncus, and Scirpus.</u>



- ❖ (Comment 4.6) The following text has been added to the *Regulatory Setting* section (page 4.3-20):

California Department of Fish and Game. The CDFG derives its authority from the California Endangered Species Act (CESA; Fish and Game Code Section 2050 *et seq*) listed under the Fish and Game Code, which prohibits take of listed threatened or endangered species. Take under CESA is restricted to direct killing of a listed species and does not prohibit indirect harm by way of habitat modification. A CESA Permit must be obtained if a future project has the potential to result in take of a species of plant or animal listed under CESA, either during construction or over the life of the project.

- ❖ (Comment 4.5) The mitigation discussion for Impact BIO-1 (page 4.3-30) has been revised as follows:

Mitigation Measures. The policies and measures outlined in the 1997 General Plan aim to protect sensitive habitats through protection of biologically significant habitats, replacement of these habitats where avoidance is not feasible, and encouragement of restoration and management of natural habitats. In addition, the Santa Ynez River and San Miguelito Creek riparian corridors fall within the jurisdictions of the USACE, RWQCB, and CDFG. As a result, individual permit requirements on a project-specific basis may require a greater replacement ratio for impacted habitat. Additional coordination with these regulatory agencies may be required, including obtaining a Streambed Alteration Agreement from the DFG pursuant to Section 1600 *et. seq.* of the California Fish and Game Code. Adherence to General Plan policies and compliance with applicable regulatory agency requirements would ensure that impacts remain less than significant. No additional mitigation is required.

- ❖ (Comment 3.4) Mitigation Measures BIO-2(a, b) (page 4.3-33) have been revised as follows:

BIO-2(a) Special Status Species Policy. The following policy shall be added to the General Plan Conservation/Open Space Element:

The City shall ~~encourage the protection of~~ protect significant biological resources, including sensitive plant and animal species.

BIO-2(b) Native Tree Protection Policy. The following policy shall be added to the General Plan Conservation/Open Space Element:

The City shall ~~encourage the protection, preservation and restoration of~~ protect, preserve, and restore native trees, particularly oak tree species.



Revisions to Section 4.6, Hazards and Hazardous Materials

- ❖ *(Comment 6.10)* The following text has been added to mitigation measure HAZ-1 (page 4.6-16):

HAZ-1 **Previously Unidentified Hazardous Materials.** Any work on a known remediation site or discovery of hazardous materials during excavation must be reported to the Santa Barbara County Fire Department Hazardous Materials Unit (HMU). In the event that hazardous waste and/or materials, including chemical odors or stained soils, are encountered during construction of future development sites, the following actions shall be taken by the applicant or authorized agent thereof: (1) all work in the vicinity of the suspected contaminant will be halted; (2) all persons shall be removed from the area; (3) the site shall be secured under the direction of the County Fire Department HMU staff; and (4) the City of Lompoc Hazardous Waste/Materials Coordinator shall be notified. Work shall not recommence until such time as the find is evaluated and appropriate measures are implemented as necessary to the satisfaction of the California Department of Toxic Substances Control.

Revisions to Section 4.7, Hydrology and Water Quality

- ❖ *(Comment 7.9)* Impact HWQ-2 (page 4.7-10), has been revised as follows:

Impact HWQ-2 ~~The northern portion~~ majority of the City of Lompoc is located within an identified dam inundation hazard area associated with the Bradbury Dam. There is potential to expose people and structures to associated dam inundation hazards. However, compliance with an existing Hazard Mitigation Plan would ensure that impacts remain Class III, *less than significant*.

Revisions to Section 4.8, Land Use and Agriculture

- ❖ *(Comment 6.6)* Impact Statement LU-2 (page 4.8-16), has been revised as follows:

Impact LU-2 The 2030 General Plan proposes annexation of four unincorporated areas adjacent to the City. The proposed expansion areas could conflict with some provisions of the Santa Barbara County's LAFCo's Standards for Annexation to Cities. However, LAFCo must make the final determination of consistency.



- ❖ *(Comment 6.8)* The following mitigation measure has been added under Impact LU-3 (page 4.8-27):

Mitigation Measures. No mitigation is required for buildout within the existing City Limits or the proposed Wye Residential Expansion area. ~~No~~ The following mitigation measure is feasible required for buildout of the proposed Bailey Avenue Specific Plan, River or Miguelito Canyon expansion areas ~~which would reduce impacts to a level of insignificance.~~

LU-3 Purchase of Agricultural Conservation Easements (PACE) Program.
The City shall implement a program that facilitates the establishment and purchase of on- or off-site Agricultural Conservation Easements for prime farmland and/or important farmland converted within the expansion areas, at a ratio of 1:1 (acreage conserved: acreage impacted). A coordinator at the City shall oversee and monitor the program, which will involve property owners, developers, the City, and potentially a conservation organization such as The Land Trust for Santa Barbara County. Implementation of a PACE program shall be coordinated with similar efforts of Santa Barbara County.

Significance After Mitigation. Impacts within the existing City Limits or the proposed Wye Residential expansion area would remain less than significant. Impacts within the Bailey Avenue Specific Plan, River and Miguelito Canyon expansion areas would be reduced to the extent feasible; however this mitigation measure does not necessarily guarantee a net increase in farmland, and therefore impacts would be remain significant and unavoidable.

Revisions to Section 4.11, Public Services

- ❖ *(Comment 7.37)* The following revision has been made to page 4.11-8, following Table 4.11-1:

d. Community Library. Public library service in the City of Lompoc is provided by the Lompoc Public Library, located at 501 E. North Avenue. The Lompoc Public Library System includes the ~~downtown library~~ Lompoc Public Library on E. North Avenue, and branches in Vandenberg Village and Buellton. Both branches are located outside the city limits of Lompoc and do not receive City of Lompoc funding. The Lompoc Library houses 90,376 print and audiovisual materials in 19,710 square feet of space, with seating for 140. The National Library standard of 0.6 square feet of library space per capita is the accepted guideline for evaluation of facility size (Molly Gerald, Library Director, personal communication, 2008). Using this standard, the Lompoc Library facility is inadequate for the current population of 42,957; an additional 6,064 square feet



is needed. It should be noted that the Charlotte's Web Children's Library is planned to be located at 211 S. I Street. This project is currently in the design development phase, and therefore is not factored into the above calculations for existing facilities.

Revisions to Section 4.12 Recreation

❖ *(Comment 7.42)* Page 4.12-1 has been revised as follows:

a. **Existing Parks and Recreation Facilities.** The City of Lompoc owns and operates ~~22~~ 21 public parks and recreation facilities (parkland) which total ~~450~~ 447 acres, as shown in Figure 4.12-1. Although the City owns and operates these parks, approximately 227 acres of this parkland is located outside of but immediately adjacent to the existing City Limits. The parkland outside City Limits includes River Park, Riverbend Park and an unnamed open space area located between River Park and Riverbend Park. Parkland within the City Limits totals ~~222.5~~ 220 acres. This total includes 2.5 acres at Lompoc Valley Middle School, and 0.32 acres at the Civic Auditorium which ~~is~~ are available under a Joint-Use Agreement between the City and the Lompoc Unified School District (LUSD).

Of the ~~450~~ 447 total acres, 28 acres are designated as neighborhood parks, ~~195~~ 192 acres are designated as community parks, and 227 acres are designated as regional parks...

❖ *(Comment 7.41)* The following paragraph on page 4.12-1 has been revised:

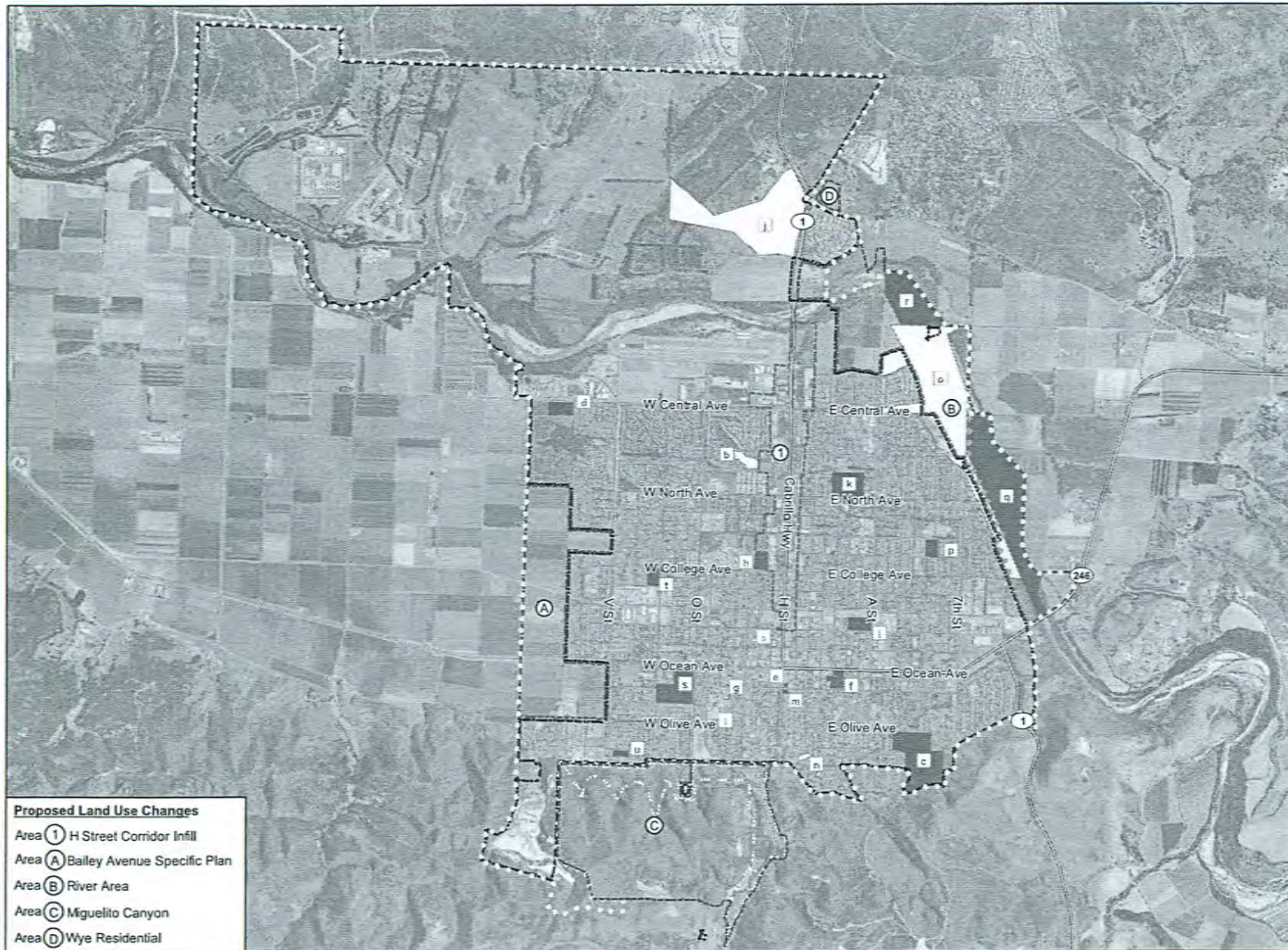
Additional parkland in and around Lompoc, but not operated by the City, are also available to Lompoc residents. These include: Jalama Beach County Park (24 miles south of Lompoc), Ocean Beach County Park (13 miles west of Lompoc), Miguelito County Park (~~located in~~ three miles south of Lompoc), and La Purisima Mission State Historic Park (located northeast of Lompoc), as well as the Endeavour Center (located on Vandenberg Air Force Base), and private facilities such as La Purisima Golf Course (located east of Lompoc) and multiple homeowner association-operated play areas, sports fields, and pools throughout the City.

❖ *(Comment 7.42)* Figure 4.12-1 has been revised (see following page).



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LEGEND

Parkland by Type

- Turf Area
- Open Space
- Other

Additional Overlays

- H Street Corridor Infill Area
- Draft Annexation Areas (Subject to LAFCO approval)
- Existing City Limits
- Proposed Area to be Added to City Urban Limit Line
- Existing City Urban Limit Line
- Existing City Sphere of Influence

Map ID	Name	Acreege
a	Anderson Recreation Center	0.30
b	Barton Park	5.11
c	Beattie Park	42.90
d	Briar Creek Park	4.00
e	Centennial Square	0.32
f	City Hall	2.50
g	Civic Auditorium	0.32
h	College Park and Aquatic Center	4.56
i	J.M. Park	5.16
j	Ken Adams Park	118.79
k	Lompoc Library	1.79
l	Lompoc Valley Middle School	2.50
m	Museum	0.32
n	Old Mission Site	1.07
o	Open Space	71.86
p	Pioneer Park	4.71
q	River Park	113.81
r	Riverbend Park	41.32
s	Ryon Memorial Park	19.62
t	Thompson Park	4.34
u	Westvale Park	1.96
Total Acreege		447.26

Source: City of Lompoc Parks, Recreation and Urban Forestry Department, 2009.

0 0.25 0.5 1 Miles

N

Proposed Land Use Changes

- Area ① H Street Corridor Infill
- Area A Bailey Avenue Specific Plan
- Area B River Area
- Area C Miguelito Canyon
- Area D Wye Residential

Base map source: City of Lompoc, 2008. Map images copyright © 2008 ESRI and its licensors. All rights reserved. Used by Permission.

Existing Parks Owned and Operated By the City

Figure 4.12-1
 City of Lompoc

❖ (Comment 7.42) Table 4.12-1 has been updated, as follows:

**Table 4.12-1
 Lompoc Park & Recreational Facilities**

Park Name	Acreage	Type	Amenities
<i>Existing Parks and Recreation Areas within City Limits</i>			
Anderson Recreation Center	0.3	Community	Multi-purpose room (gymnasium), several classrooms, and a kitchen
Barton Park	5.11	Neighborhood	Playground, benches, basketball court, walking path, and open turf play areas, access to the East-West Channel Bike Path and dog park
Beattie Park	42.90	Community	Playground, picnic area, basketball courts, horseshoe pits, fitness trail, athletic field, BBQs, urban forest preserve
Briar Creek Park	4	Community	Tot lot, restrooms, baseball field, open play area
Centennial Square	0.32	Community	Benches, gazebo, art gallery
College Park and Lompoc Aquatic Center	4.56	Neighborhood	Skate park, YMCA location. Aquatic center includes competition pool, recreation pool with water features and water slides, therapeutic pool, and classroom
Lompoc Valley Community Center	2.7	Community	Senior activities, educational programs and classes, private rentals, company events. Facility offers dining room, meeting and classrooms, and a kitchen
Civic Auditorium	0.3	Community	430 seat auditorium and classroom
City Hall	2.50	Community	Benches, public art
Johns-Manville J.M. Park	5.2 5.16	Neighborhood	Playground, BBQs, 2 lighted baseball fields, basketball court
Ken Adams Park	118.8 118.79	Community	Playground, BBQs, nature trails, horseshoe and volleyball facilities
Lompoc Library	1.8 1.79	Community	Library amenities, benches, public art
Museum	0.32	Community	Benches, public art
Old Mission Site	1.1 1.07	Community	Educational amenities
Pioneer Park	4.71	Neighborhood	Baseball field, playground, benches, pre-school facility, open turf areas
Ryon Memorial Park	19.62	Community	Baseball and softball fields, tennis courts, athletic field, tot lot, BBQs, stage
Thompson Park	4.34	Neighborhood	Playground, BBQs, softball field, benches, open turf
Westvale Park	2 1.96	Neighborhood	Playground, tot lot, benches, open turf areas
Subtotal	217.5 217.15		
<i>Parks and Recreation Available Through Joint-Use Agreements with Lompoc Unified School District</i>			
Lompoc Valley Middle School	2.50	Neighborhood	Playground, softball field, benches
Civic Auditorium	0.32	Community	430 seat auditorium and classroom
Subtotal	2.82		
<i>Existing Parks and Recreational Areas Owned and Operated by the City Outside City Limits</i>			
River Bend Park	41.32	Regional	Baseball field, BBQs, batting cages, multi-use athletic fields
River Park	113.81	Regional	Playground, fitness trail, Kiwanis Lake, horseshoe pits, volleyball courts, campground, large group BBQs
Unnamed Open Space (adjacent to River Park)	71.9 71.86	Regional	Open space, passive recreation trails



**Table 4.12-1
 Lompoc Park & Recreational Facilities**

Park Name	Acreage	Type	Amenities
<i>Subtotal</i>	227 226.99		
Total Existing Acreage	447.3 446.96		
<i>Planned Park Facilities</i>			
River Bend Park (phase III)	4.3	Regional	Baseball fields, restrooms, concessions
River Park Campground	8	Regional	Campground, restrooms, showers
Unnamed Park	0.5	Community	Formal park, fountain, art, restrooms
Total Proposed Acreage	12.8		
Total Existing and Proposed Acreage	460.1 459.76		

The following paragraph on page 4.12-7 has also been revised:

The City of Lompoc currently has a population of 42,892 (Department of Finance, 2009). Based on the standards outlined in Policy 1.1 above, the City of Lompoc should have 85.8 acres of neighborhood parkland, 214.5 acres of community parkland and 214.5 acres of regional parkland, for a total of 515.5 acres. As shown in Table 4.12-1, the City currently has 28 acres of neighborhood parkland, ~~195~~ 192 acres of community parkland, and 227 acres of regional parkland. The City therefore has an existing deficit of 57.8 acres of neighborhood parkland and ~~19.5~~ 22.5 acres of community parkland. The City exceeds the regional parkland requirement by 12.5 acres.

In addition, the cumulative impact discussion on page 4.12-10 has been updated as follows:

Cumulative buildout of the 2030 General Plan includes buildout of areas within existing City boundaries as well as buildout of the four identified expansion areas. Impacts related to recreation from these components of the General Plan have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed General Plan Update. Upon 2030 General Plan buildout, the cumulative population increase would be approximately 16,568, resulting in a total City population of 59,525. This population would generate a need for 119.1 acres of neighborhood parkland (33.23 acres above existing demand), 296.3 acres of community parkland (~~125.1~~ 81.8 acres above existing demand) and 296.3 acres of regional parkland (~~125.1~~ 81.8 acres above existing demand). The 59 acres of community parkland in the Bailey Avenue Specific Plan area would accommodate some of this demand, as would the existing ~~12.2~~ 12.5 acre surplus in regional parkland. However, the additional demand would still exceed current and anticipated supplies. This additional demand for parkland would create the need for new or expanded recreational facilities, the construction of which could cause adverse



environmental impacts. However, as discussed above, future development within the City Limits would be required to pay in-lieu fees. Upon compliance with these existing requirements, impacts would be less than significant.

Revisions to Section 4.13, Transportation and Circulation

- ❖ *(Comment 7.46)* The following paragraph on page 4.13-16 has been revised:

Transit System. City of Lompoc Transit (COLT) provides public transit service within Lompoc, Mission Hills, and Vandenberg Village. There are five local bus routes serving these areas. Service is available from 6:30 am to 8:00 pm on weekdays, and 9:00 am to 5:00 pm on Saturday. Curb-to-curb service is also available for persons with disabilities. ~~COLT is currently designing a Transit Center.~~

- ❖ *(Comment 7.48)* Page 4.13-41 has been revised as follows:

Significance After Mitigation. As shown in Table 4.13-5, implementation of mitigation measures TC-1(a) through TC-1(k) would reduce impacts to a less than significant level for all intersections except the ~~H Street/Central Avenue and A Street/Ocean Avenue~~ intersections. Although Mitigation Measure TC-1(j) could reduce impacts to a less than significant level for the A Street/Ocean Avenue intersection, it is not considered feasible mitigation measures due to the high costs associated with the improvements. As such, build-out of the draft 2030 General Plan would have an unavoidably significant impact to the ~~H Street/Central Avenue and A Street/Ocean Avenue~~ intersections. However, it should be noted that the intersections of H Street/Central Avenue and A Street/Ocean Avenue is are in the SBCAG CMP and meets the CMP intersection minimum level of service criteria of LOS D.

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	Eric Gage, Air Quality Specialist	Santa Barbara County Air Pollution Control District (SBCAPCD)	November 25, 2009
2	Justin Ruhge	Private Citizen	November 29, 2009
3	Roger P. Root, Assistant Field Supervisor	United States Fish and Wildlife Service (USFWS)	November 30, 2009
4	Edmund J. Pert, Regional Manager	California Department of Fish and Game (CDFG), South Coast Region	November 30, 2009
5	Chris Shaeffer	California Department of Transportation (Caltrans) District 5, Development Review	November 30, 2009
6	Michael F. Brown, County Executive Office	County of Santa Barbara, Executive Office	November 30, 2009
7	Janice Keller	Private Citizen	November 30, 2009





Santa Barbara County
Air Pollution Control District

Letter #1

November 25, 2009

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

Re: Draft EIR for Lompoc General Plan Update

Dear Ms. Breese:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Lompoc General Plan Update. The City of Lompoc proposes to update the Housing, Circulation, and Land Use Elements of the City's General Plan.

APCD staff reviewed the Initial Study and NOP for the Draft EIR, and concurs that air quality impacts will be potentially significant. APCD's guidance document, entitled *Scope and Content of Air Quality Sections in Environmental Documents* (updated June, 2008) is available online at www.sbcapcd.org/apcd/landuse.htm. This document should be referenced for general guidance in assessing air quality impacts in the Draft EIR. The EIR should evaluate the following potential impacts related to the Lompoc General Plan Update:

1. **Executive Summary, Table ES-1, Page ES-6:** In the row corresponding to Impact AQ-1 (Consistency with Clean Air Plan), please reference the Transportation Control Measures under the column for Mitigation Measures. 1.1

2. **Section 4.2.1.b, Local Regulatory Framework, Table 4.2-2, Page 4.2-6:** The national lead standard in the table of Current Federal and State Ambient Air Quality Standards should include a rolling 3-month average of $0.15\mu\text{g}/\text{m}^3$. Please also list the four California standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles. Please verify the table data with the ambient air quality standards listed on the District website at <http://www.sbcapcd.org/sbc/T1.htm>. 1.2

3. **Section 4.2.1.b, Local Regulatory Framework, Page 4.2-7:** On June 30, 2009, The U.S. Environmental Protection Agency (USEPA) granted California a waiver request to implement GHG emission reduction standards for new passenger vehicles. Please update the text of the second full paragraph to include the recent action by USEPA. 1.3

4. Section 4.2.1.b, Local Regulatory Framework, Page 4.2-8: On November 19, 2009, the Regional Targets Advisory Committee (RTAC) presented the California Air Resources Board with recommendations for GHG reduction target setting. Please update the text of the fourth full paragraph to include the recent action by RTAC.

1.4

5. Section 4.2.1.c, Current Ambient Air Quality, Pages 4.2-9: On October 8, 2009, The USEPA issued area designations for the 24-hour national air quality standard for PM_{2.5}. Please update the text of this section to include the recent action by the USEPA and the Santa Barbara County designation of attainment for PM_{2.5}.

1.5

6. Section 4.2.1.c, Current Ambient Air Quality, Pages 4.2-10: In the first sentence of the second paragraph, please clarify that the data in Table 4.2-3, Ambient Air Quality Data, is collected from a single monitoring station, and representative of the city's local airshed, not the county's. Please identify the monitoring station in the Table heading.

1.6

7. Section 4.2.2.a, Methodology and Significance Thresholds, Pages 4.2-12: The third paragraph of this section includes the following statement: *"The SBCAPCD has adopted numeric significance thresholds for individual development projects. However, use of these thresholds would not be appropriate for a General Plan since they are intended for use in evaluating the effects of individual projects while the General Plan EIR considers the cumulative effect of all individual projects within the City."* The District's guidance document, entitled *"Scope & Content of Air Quality Sections in Environmental Documents,"* includes recommendations for assessing a project's individual and cumulative impacts on air quality. The District's board-adopted project-specific significance thresholds should be applied to all projects, including plan-level projects such as the Lompoc General Plan Update, as identified in Section 4 of the *Scope and Content* guidance document. Section 4.3.1 of the *Scope and Content* guidance document includes a discussion of how to quantify air pollutant emissions for plan-level projects such as the subject project. The District recommends that construction and operational emissions from build-out of the General Plan be included in the impact analysis section of the EIR. If impacts are significant, please include applicable mitigation measures.

1.7

8. Section 4.2.2, Impact Analysis, Page 4.2-38: Although the EIR does include discussion of greenhouse gases and makes a finding of less than significant impact, APCD staff strongly recommends inclusion of a list of specific feasible mitigation measures for GHG emissions in this section. At a minimum, the EIR Air Quality mitigation section should include a discussion of energy-conserving measures and mitigations to reduce emissions of greenhouse gases by:

1.8

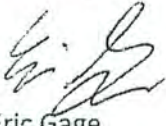
- Incorporating green building technologies;
- Increasing energy efficiency measures at least 20% beyond those required by California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations);
- Encouraging the use of transit, and in more compact urban areas, bicycling and walking;

- Increasing recycling goals (e.g., separate waste and recycling receptacles); and,
- Increasing street landscaping (shade trees decrease energy requirements and also provide carbon storage).

For more information regarding these and other mitigation measures, please refer to the *CAPCOA CEQA & Climate Change document*, available at www.sbcapcd.org/apcd/landuse.htm, and the *CAPCOA Model Policies for Greenhouse Gases in General Plans document*, available at www.capcoa.org.

We hope you find our comments useful. Please contact me at 961-8893 or by e-mail at edg@sbcapcd.org if you have questions.

Sincerely,



Eric Gage
Air Quality Specialist
Technology and Environmental Assessment Division

cc: TEA Chron File

↑
1.8

Letter 1

COMMENTER: Eric Gage, Air Quality Specialist, Santa Barbara County Air Pollution Control District

DATE: November 25, 2009

RESPONSE:

Response 1.1

The commenter requests that the mitigation measures for Impact AQ-1 listed in the Executive Summary include a reference to the Transportation Control Measures listed in the City of Lompoc General Plan Land Use and Circulation Element. In response to this comment, the mitigation associated with Impact AQ-1 in Table ES-1 (page ES-6) has been modified to include this reference, as follows:

Transportation Control Measures (TCMs) contained in the 2007 Clean Air Plan (CAP) and listed in Table 4.2-4 would reduce overall air quality impacts to the extent feasible. However, nNo feasible mitigation measures are available that would reduce impacts to a less than significant level.

Since these TCMs are discussed at length in Impact AQ-1 in Section 4.2, *Air Quality and Climate Change*, no revision to the discussion in Section 4.2 is warranted.

Response 1.2

The commenter recommends that Table 4.2-2 include the national lead standard for a rolling 3-month average and the California standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles be included in the table. In response to this comment, Table 4.2-2 has been modified to include these standards:

**Table 4.2-2
Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Ozone	0.075 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.07 ppm (8-hr avg)
Carbon Monoxide	9.0 ppm (8-hr avg) 35.0 ppm (1-hr avg)	9.0 ppm (8-hr avg) 20.0 ppm (1-hr avg)
Nitrogen Dioxide	0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.03 ppm (annual avg)



**Table 4.2-2
 Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Sulfur Dioxide	0.03 ppm (annual avg) 0.14 ppm (24-hr avg) 0.5 ppm (3-hr avg)	0.04 ppm (24-hr avg) 0.25 ppm (1-hr avg)
Lead	1.5 µg/m ³ (calendar quarter) 0.15 µg/m ³ (rolling 3-mo avg)	1.5 µg/m ³ (30-day avg)
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr avg)	20 µg/m ³ (annual avg) 50 µg/m ³ (24-hr avg)
Particulate Matter (PM _{2.5})	15 µg/m ³ (annual avg) 35 µg/m ³ (24-hr avg)	12 µg/m ³ (annual avg)
<u>Visibility Reducing Particles</u>	<u>n/a</u>	<u>Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more due to particles when relative humidity is less than 70 percent (8-hr avg)</u>
<u>Sulfates</u>	<u>n/a</u>	<u>25 µg/m³ (24-hr avg)</u>
<u>Hydrogen Sulfide</u>	<u>n/a</u>	<u>42 µg/m³ (1-hr avg)</u>
<u>Vinyl Chloride</u>	<u>n/a</u>	<u>26 µg/m³ (24-hr avg)</u>

ppm= parts per million

µg/m³ = micrograms per cubic meter

Source: California Air Resources Board, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, November 2008.

The commenter further requests that the table data are checked for consistency with the ambient air quality standards listed on the SBCAPCD website. The data were checked against the SBCAPCD-listed standards and are accurate.

Response 1.3

The commenter requests that the regulatory framework in the Air Quality section’s setting discussion be updated to reflect new policy information related to state implementation of GHG emissions reductions standards for new passenger vehicles. In response to this comment, Section 4.2.1(b), *Local Regulatory Framework*, has been updated to include this information as follows:

The United States is currently using a voluntary and incentive-based approach toward emissions reductions in lieu of the Kyoto Protocol’s mandatory framework. To date, the USEPA has not regulated GHGs under the Clean Air Act. However, the U.S. Supreme Court in *Massachusetts v. EPA* (April 2, 2007) held that the USEPA can, and should, consider regulating motor-vehicle GHG emissions. The USEPA has not yet promulgated federal regulations limiting GHG emissions. The USEPA in December 2007 denied California’s request for a waiver to directly limit GHG tailpipe emissions, which prompted a suit by California in January 2008 to overturn that decision. On June 30, 2009, the



USEPA granted California's request for a waiver to directly limit GHG tailpipe emissions for new motor vehicles beginning with the current model year.

Response 1.4

The commenter requests that the Air Quality section regulatory framework be updated to reflect new policy information related to Regional Targets Advisory Committee's (RTAC) GHG reduction target recommendations to the California Air Resources Board (ARB). In response to this comment, Section 4.2.1(b), *Local Regulatory Framework*, has been updated to include this information, as follows:

Senate Bill (SB) 375, signed in August 2008, requires the inclusion of sustainable communities' strategies (SCS) in regional transportation plans (RTPs) for the purpose of reducing GHG emissions. The bill requires ARB to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles, for 2020 and 2035. On January 23, 2009 ARB appointed a Regional Targets Advisory Committee (RTAC) to provide recommendations on factors to be considered and methodologies to be used in the ARB target setting process, as required under SB 375. The Committee must provide its recommendations in a report to ARB by September 30, 2009. The RTAC final report, issued on September 30, 2009, recommended "ambitious but achievable" targets, with a substantial emphasis on improving home affordability (rents and mortgages) near job centers as a means to reduce driving. The California Air Resources Board will set the final targets by September 30, 2010.

Response 1.5

The commenter requests that the current ambient air quality setting be updated to reflect new USEPA area designations for the 24-hour national air quality standard for PM_{2.5}. In response to this comment, Section 4.2.1(c), *Current Ambient Air Quality*, has been updated to include this information, as follows:

c. **Current Ambient Air Quality.** The SBCAPCD monitors air pollutant levels to assure that air quality standards are met, and if they are not met, to also develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, the air basin is classified as being in "attainment" or as "non-attainment." The SCCAB, in which the General Plan area is located, is in non-attainment for the state eight-hour ozone standard, the state standard for PM₁₀, and the federal standard for PM₁₀. ~~There is not yet enough data to determine the basin's attainment status for either the federal standard for PM_{2.5} or the state standard for PM_{2.5}.~~ On October 5th, 2009, the USEPA issued area designations for the 2006 24-hour national air quality



standard for PM_{2.5}. Santa Barbara County is in attainment for the national standard for PM_{2.5}. The County is in attainment for all other standards.

Response 1.6

The commenter requests that the current ambient air quality setting be updated to clarify that the data in Table 4.2-3, Ambient Air Quality Data, is collected from a single monitoring station. In response to this comment, Section 4.2.1(c), *Current Ambient Air Quality*, has been updated to clarify this information, as follows:

Table 4.2-3 summarizes the annual air quality data for the City of Lompoc's local airshed, collected at the Lompoc-S H Street station, located at South H Street and Ocean Avenue. The ARB maintains over 60 air quality monitoring stations throughout California, including the Lompoc-S H Street station, ~~located at South H Street and Ocean Avenue~~. The data collected at this station is considered to be ~~generally~~ representative of the baseline air quality experienced in the General Plan area.

Response 1.7

The commenter states that emissions associated with buildout of the Lompoc General Plan Update should be subject to SBCAPCD thresholds of significance, contained in the District's guidance document, *Scope & Content of Air Quality Sections in Environmental Documents*. In addition, the commenter requests that construction and operational emissions from buildout of the General Plan be included in EIR.

The EIR is programmatic in nature and examines the impacts of a General Plan update which includes goals and policies that would allow for future development in the City of Lompoc. The SBCAPCD thresholds of significance, contained in *Scope & Content of Air Quality Sections in Environmental Documents*, are set at a level appropriate for project-level analysis.

Future development under the General Plan would be subject to project-level emissions analysis in accordance with SBAPCD requirements. The existing 1997 General Plan Resource Management Element (RME) includes policy RME 7.4, which requires development under the General Plan to analyze and mitigate air quality impacts using methodologies and significance thresholds recommended by SBCAPCD.

Air quality impacts resulting from General Plan buildout are evaluated in Impact AQ-1, Clean Air Plan Consistency. Please refer to Impact AQ-1 for a discussion of buildout impacts. Impact AQ-1 was determined to be significant and unavoidable, and although mitigation measures are identified to reduce this impact, the reduction does not result in less than significant impacts. No changes to the EIR are necessary.



Response 1.8

The commenter recommends that the EIR include a list of specific feasible mitigation measures for greenhouse gas (GHG) emissions, including a discussion of energy-conserving measures and other GHG reduction measures, including green building technologies, increasing energy efficiency, and encouraging the use of transit, bicycling, and walking. The EIR includes a quantitative assessment of GHG emissions pursuant to direction from the California Attorney General's Office and concludes that impacts related to this issue area would be potentially significant but mitigable. Mitigation measures AQ-4(a) and AQ-4(b) are included, which require an additional General Plan policy related to long-term GHG emissions reduction planning, and consideration of all feasible GHG emissions reduction measures in order to reduce GHG emissions from future development under the General Plan.

In addition, the EIR includes a discussion of General Plan policies that would reduce impacts related to GHG emissions. The discussion has been broadened to include additional policies in the 2030 General Plan's Land Use Element (LUE) and Housing Element (HE) that promote energy efficiency, green building, and increased recycling, and support infill development, in response to this comment. Under Impact AQ-4 in Section 4.2, *Air Quality*, the discussion of General Plan Policies which Reduce Impacts has been updated as follows:

The 2030 General Plan Land Use Element (LUE) includes policies specifically intended to reduce impacts from future growth in Lompoc, which would indirectly reduce GHG emissions. These policies include LUE Policies 1.7 and 5.4 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). In addition, the Circulation Element (CE) includes policies which target reductions in air pollutant emissions through circulation design factors and compliance with applicable laws and regulations, which would also serve to reduce air pollutants, including GHGs. These policies include CE Policies 3.1 through 3.3, 3.5 through 3.9, 3.12, and 3.13 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). The existing 1997 General Plan Resource Management Element (RME) also includes policies which would reduce emissions through coordination between the City and SBCAPCD, as well as circulation design factors and compliance with applicable laws and regulations. These policies include RME Policies 7.1 through 7.4, 7.6, 8.1, and 8.2 (refer to *General Plan Policies which Reduce Impacts* under Impact AQ-1). In addition, the following Housing Element Goals and Policies and additional LUE Policy would reduce emissions, including GHG emissions.

HE Goal 4 Maximize energy efficiency in existing and future residential development.

HE Policy 4.1 The City shall continue to encourage the design and installation of energy conservation, water conservation,



and solid waste reduction measures in all construction and rehabilitation projects.

HE Policy 4.2 The City shall provide financial and technical assistance based upon the availability of funding to property owners who desire to improve energy and water efficiency of their housing units but are unable to afford improvement costs.

HE Policy 4.3 The City shall encourage the use of active and passive solar energy in the design of all new construction projects.

HE Policy 4.4 The City shall consider the development of green building standards for possible application to new residential development, including affordable housing.

LUE Policy 2.4 The City shall encourage creative and efficient site designs in residential developments which address natural constraints, promote energy efficiency and overall sustainability, protect aesthetic qualities, and maintain neighborhood character.

Additional strategies to reduce GHG emissions are available from the California Climate Action Team (http://www.climatechange.ca.gov/climate_action_team/reports/index.html) and the California Office of the Attorney General (<http://www.ag.ca.gov/globalwarming/>). These strategies would be considered as part of the review of future development under the General Plan in accordance with Mitigation Measure AQ-4(b).



Letter #2

From: Justin Ruhge [mailto:jaruhge@hotmail.com]
Sent: Sunday, November 29, 2009 3:51 PM
To: Breese, Lucille
Subject: EIR

To: City of Lompoc
Attn: Ms. Lucille Breese, AICP
Subject: General Plan Update Draft Environmental Impact Report(EIR) section 4.13, Transportation and Circulation.

11-29-2009

Your draft EIR treats Lompoc as a traffic island from which no one enters or leaves. Your primary solution to traffic problems from 2030 buildout are busses, bikes and walking. As any example today shows clearly these are not realistic solutions. No one uses busses or rides bikes around here except for sport or exercise. The Colt system is completely underutilized. Walking is also recreational. Lompoc is a car and truck town and cannot exist without both. The glaring shortcoming of the EIR is lack of considerations of connectivity to the outside world. Such connectivity is absolutely required to maintain the economic viability of the City.

2.1

The majority of residents in Lompoc commute to jobs from 5 to 70 miles every day. The lack of good jobs, except city jobs in Lompoc, require that if one lives in Lompoc one must commute. Without the commuters who pay the property taxes and the sales taxes the city of Lompoc would not exist and you all would be out of the fine jobs that you have. But the roads that connect Lompoc to the south jobs in Goleta and Santa Barbara are deficient for the present purpose and for any growth in the future to 2030 buildout. Yet your EIR does nothing to address this obvious transportation shortcoming. Cars and trucks are the main means of transportation now and will surly remain so in the future.

2.2

101 is the main job artery to the south job centers. The major connection to it is via state highway 246. However, 246 lacks safety and capacity to reach the future development needed by the City to maintain and improve the economic viability of the area. A safe, modern four- lane parkway must be developed to connect Lompoc with 101 so the Lompoc area can achieve its future economic potential as a regional business area.

This EIR must be expanded to deal with the planned development in the Bailey corridor, and the major development approved for the Y area. A four- lane boulevard from Buellton to either the Ocean or the Central area must be programmed in the EIR. A four- lane development of the Purisima corridor must be programmed into the plans to meet the traffic needs in the Y area.

2.3

A modern interchange must be planned to join the 246-Purisima intersection. Without these extended plans the discussions in the present EIR are not achievable.

2.4

Lompoc cannot even plan to exist as it is today without **regional** planning of its transportation needs. Please change the EIR accordingly. Lompoc is an Island connected by road causeways to other islands outside of the City.

2.5

On another subject. The City should not accept any new development unless the roads are standard city widths and are the responsibility of the city to own and maintain. Homeowners should not be saddled with the future responsibility of maintaining the roads while paying the City property taxes to do so.

2.6

Justin M. Ruhge, Lompoc, CA.93436.

Letter 2

COMMENTER: Justin Ruhge

DATE: November 29, 2009

RESPONSE:

Response 2.1

The transportation forecasting model developed for the City of Lompoc provides the ability to evaluate traffic internal to Lompoc, traffic that leaves or enters Lompoc, and traffic that passes through Lompoc without stopping. The model incorporates data from the Santa Barbara County Association of Governments (SBCAG) regional transportation forecasting model. This includes data on existing and future through traffic demands on SR 246 and SR 1 and existing and future land use growth throughout the County. The county-wide growth inputs allow the model to estimate the amount of traffic with an origin in Lompoc and destination outside of Lompoc, or traffic with an origin outside of Lompoc and destination in Lompoc. All of the features built into the transportation forecasting model allow the model to evaluate the proposed General Plan land uses as they would impact travel patterns inside Lompoc and on the regional transportation network. Contrary to the commenter's assertion, the model does not treat Lompoc as an "island" lacking connectivity to the outside world.

The evaluation of transportation impacts in the DEIR was completed using the model discussed above. This model assumed that the primary mode of transportation in Lompoc would remain the automobile. No major shift from automobile use to transit, bicycling, or walking was assumed in the DEIR. However, as noted in the DEIR, shifts to modes other than the automobile would provide a reduction in automobile traffic and could reduce the need for major transportation improvements.

Response 2.2

Please see the response to Comment 2.1.

Improvements to SR 246 are not the sole responsibility of the City of Lompoc. The improvement of SR 246 from Lompoc to US 101 falls mostly outside of the City's jurisdiction and would need to be coordinated with Santa Barbara County, Caltrans, the City of Buellton, and SBCAG.

Response 2.3

The proposed development in the Bailey Avenue Specific Plan and in the Wye area were included in the transportation forecasting model and evaluated in the DEIR.



Response 2.4

The traffic demands at the SR 246/Purisima Road intersection indicate that a traffic signal would provide adequate traffic control to meet level of service standards.

Response 2.5

Please see the response to Comment 2.1.

Response 2.6

This comment does not directly relate to an environmental issue included in the EIR, therefore no further response is necessary. Nevertheless, this comment is noted and will be forwarded to the appropriate decision-makers for review and consideration.



Letter #3

United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
2010-CPA-0014

November 30, 2009

Lucille T. Breese, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, California 93446

Subject: Comments on the Draft Lompoc General Plan Update Environmental Impact Report for the City of Lompoc, Santa Barbara County, California

Dear Ms. Breese:

We are responding to the City of Lompoc's (City) request for comments on the draft Lompoc General Plan Update Environmental Impact Report (DEIR) (City 2009). The existing General Plan for the City of Lompoc was adopted in 1997. The City has determined that the current General Plan needs to be updated to incorporate several additional elements.

The DEIR indicates that the following federally listed species may occur in the project area: the endangered southwestern willow flycatcher (*Empidonax traillii extimus*), California least tern (*Sterna antillarum browni*) (and its critical habitat), least Bell's vireo (*Vireo bellii pusillus*), California tiger salamander (*Ambystoma californiense*), tidewater goby (*Eucyclogobius newberryi*), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), El Segundo blue butterfly (*Euphilotes battoides allyni*), La Graciosa thistle (*Cirsium loncholepis*), Gaviota tarplant (*Deinandra increscens* ssp. *villosa*), Lompoc yerba santa (*Eriodictyon capitatum*), beach layia (*Layia carnosa*), and Gambel's watercress (*Rorippa gambellii* [*Nasturtium gambellii*]), and the threatened California red-legged frog (*Rana aurora draytonii*), western snowy plover (*Charadrius alexandrinus nivosus*), and vernal pool fairy shrimp (*Branchinecta lynchi*). Based on historical distribution and associated habitats, the federally endangered marsh sandwort (*Arenaria paludicola*) may also occur within the project area; therefore, we recommend that this species be addressed in the final EIR. Several State-listed species and species of special concern may also occur within the project area.

3.1

The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibits the taking of any endangered or threatened species. Section 3(18) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation, which actually kills or injures wildlife by significantly impairing essential behavioral patterns,

3.2

including breeding, feeding, or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns, which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species.

Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways. If the subject project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If a proposed project does not involve a Federal agency but may result in take of a listed animal species, the project proponent should apply for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act.

This letter does not reflect a comprehensive review of the DEIR on our part. We are providing our comments based upon a review of sections addressing biological resources, those that may be associated with biological resources, project activities that have potential to affect federally listed species, other special status species, and our concerns for listed species within our jurisdiction related to our mandates under the Act.

General Comments

1. The DEIR's discussions of biological resources, assessments of potential impacts, and mitigation measures for impacts within the project area are limited or, in some cases, absent from the document. We recommend including in the EIR an analysis of potential impacts to federally listed species or designated critical habitat that occurs or has potential to occur within the project area. In addition, we recommend that the EIR relate these potential impacts to specific proposed mitigation or minimization measures (e.g., avoidance measures, survey protocols, mitigation ratios, and permit requirements for federally listed species).

2. The mitigation measure in the DEIR concerning sensitive species is generally worded and vague, and does not adequately address project-specific impacts (i.e., direct, indirect, and cumulative). The subject measure simply stipulates that "The City shall encourage the protection of significant biological resources, including sensitive plant and animal species" (City 2009). We recommend that you include mitigation measures with tangible and measureable criteria such that staff at the City and other regulatory agencies, as well as project proponents, can unambiguously determine whether a particular activity or action avoids, minimizes, or mitigates impacts to sensitive resources (specifically for federally listed species and designated critical habitat).

3. The DEIR lacks a thorough discussion of known, potential, and expected distributions and occurrences of federally listed species within the project area. Without this information, it is extremely difficult to make a determination of significance, particularly concerning the potential effects on federally listed species. Based on our understanding



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of the known and potential distributions of species in the area, the project could result in take of federally listed species. Specific distribution and abundance information for these species is necessary to inform future planning efforts; it is also important for accurate evaluation of potential impacts and the subsequent development of adequate mitigation measures. We recommend that the City work with us to incorporate measures in the final EIR to avoid unauthorized take of federally listed species. If take cannot be avoided, the City must seek take authorization through the section 10 process described above unless a Federal nexus exists, in which case take may be exempted from the section 9 prohibitions through interagency consultation pursuant to section 7(a)(2) of the Act.

3.5

4. The alternatives analysis in section 6.6 of the DEIR states that the No Project Alternative would be the environmentally superior alternative, but that it is not feasible from either a legal or practical standpoint. The analysis continues that among the remaining alternatives, the No Project Alternative (from the 1997 General Plan) and the Low Growth Alternative could be considered environmentally superior because they reduce impacts associated with development of the four identified expansion areas and would facilitate fewer overall new residences. Without clear survey requirements or specific distribution information for sensitive species, we are unable to conduct a meaningful analysis of the alternatives within the DEIR. Consideration of Alternatives under the California Environmental Quality Act (CEQA) Section 15126.6(c) Selection of a Range of Reasonable Alternatives requires that "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." The DEIR does not contain an alternative to the proposed project that will avoid or substantially lessen the significant effects to biological resources. Based on our review of the DEIR, it appears that the impacts of the proposed project on federally listed species could be reduced or avoided through alternative project design(s) that may be feasible. We recommend that an alternative be developed that contains specific avoidance and minimization measures for federally listed species. Buildings, roads, and infrastructure could potentially be sited in areas of lower concentration of biological resources. This would also include maximizing the distance of development from sensitive areas and water courses to the extent practical. We recommend that you work with the California Department of Fish and Game to develop this alternative. We are also available to help the City develop such an alternative.

3.6

Migratory Birds

The Service has conservation responsibilities and management authority for migratory birds under the Migratory Bird Treaty Act of 1918, as amended (MBTA) (16 U.S.C. 703 et. seq.). Any land clearing or other surface disturbance associated with proposed actions should be timed to avoid potential destruction of bird nests or young of birds that breed in the area, as such destruction may be in violation of the MBTA. Under the MBTA, nests with eggs or young of migratory birds may not be damaged, nor may migratory birds be killed. If this seasonal restriction is not possible, we recommend that a qualified biologist survey the area for nests or

3.7

Lucille T. Breese

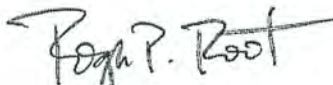
4

evidence of nesting (e.g., mated pairs, territorial defense, carrying of nesting material, transporting food, etc.) prior to the commencement of land clearing activities. If nests or other evidence of nesting are observed, a protective buffer should be delineated and the entire area avoided to prevent destruction or disturbance to nests until they are no longer active.

We appreciate the opportunity to provide comments on the proposed project and look forward to working with the City to address the Project's potential effects on federally listed species and ensure compliance with the Act. If you have any questions regarding these comments, please contact Mark A. Elvin of my staff at (805) 644-1766, extension 258.

↑
3.7

Sincerely,



Roger P. Root
Assistant Field Supervisor

cc:

Mary Meyer, California Department of Fish and Game

REFERENCES CITED

City of Lompoc. 2009. Draft Lompoc general plan update environmental impact report (SCH No. 2008081032). Dated October 2009. 1,568 pp.

Letter 3

COMMENTER: Roger P. Root, Assistant Field Supervisor, United States Fish and Wildlife Service

DATE: November 30, 2009

RESPONSE:

Response 3.1

At the request of the US Fish and Wildlife Service (USFWS), the state- and federally-endangered marsh sandwort has been added to the list of sensitive plants that could potentially occur in the Lompoc General Plan area. Table 4.3-1 has been revised to include the following:

**Table 4.3-1
 Sensitive Plants in the Vicinity of the Lompoc General Plan Area**

Common Name	Scientific Name	Agency Status (Federal/State/Other)	Habitat
<u>Marsh sandwort</u>	<u><i>Arenaria paludicola</i></u>	<u>FE/SE/ CNPS List 1B</u>	<u>Stoloniferous, perennial herb; blooms May to August; occurs in freshwater marshes and swamps, bogs and fens, and some coastal scrub, ranging from 3 to 170 meters in elevation; common associates include Typha, Juncus, and Scirpus.</u>

This species has been added to the table above to provide full disclosure of all species that could potentially occur in the project area. However, this species does not appear on the Ventura USFWS office’s species list for Santa Barbara County, and there are no CNDDDB records for this species within Santa Barbara County. The nearest documented occurrence is cited by Clifton Smith in the Oso Flaco area of Nipomo. Furthermore, this species is typically found in marshes and swamps. If present in the General Plan area, this species would likely be confined to the Santa Ynez River area, which is protected by its General Plan designation of ‘Biologically Significant.’ For these reasons, buildout of the proposed General Plan is not anticipated to impact this endangered plant species. However, future development proposed in the General Plan area will be subject to subsequent environmental review and any federal permitting requirements under USFWS, which will ensure the protection of sensitive species in the project area. No change to the EIR is necessary.



Response 3.2

The commenter discusses the Service's responsibilities in administering the Endangered Species Act. A similar discussion is contained in the *Regulatory Setting* section, beginning on page 4.3-20 of the EIR. No further comment is necessary.

Response 3.3

The EIR is programmatic in nature and examines the impacts of a General Plan update which includes goals and policies that would allow for future development in the City of Lompoc. Future development within the Plan Area will be subject to subsequent environmental review and applicable permits. Therefore, the analysis of potential impacts to biological resources (including critical habitat and sensitive species) is discussed on a broad scale, rather than at a project-specific level of detail, with policy-based mitigation measures included when appropriate. This type of mitigation is intended to provide general guidelines for future development, which is appropriate for a General Plan. As future development is reviewed over the life of the General Plan, more explicit impacts and mitigation measures will be addressed, on a project-specific basis. No changes to the EIR are necessary.

Response 3.4

Mitigation Measures BIO-2(a, b) have been revised as follows:

BIO-2(a) Special Status Species Policy. The following policy shall be added to the General Plan Conservation/Open Space Element:

The City shall ~~encourage the protection of~~ protect significant biological resources, including sensitive plant and animal species.

BIO-2(b) Native Tree Protection Policy. The following policy shall be added to the General Plan Conservation/Open Space Element:

The City shall ~~encourage the protection, preservation and restoration of~~ protect, preserve, and restore native trees, particularly oak tree species.

Response 3.5

Please refer to Response 3.3 above.



Response 3.6

As noted by the commenter, the State CEQA Guidelines specify that alternatives selected for analysis in the EIR should focus on minimizing or avoiding the proposed project's significant impacts. No significant and unavoidable (Class I) impacts to biological resources were identified in the EIR. Therefore, it is not necessary that a new alternative be crafted to reduce potential impacts to biological resources, since the EIR concluded that all impacts would be reduced to a less than significant level with the incorporation of mitigation measures. The Alternatives Analysis included in the DEIR considers a reasonable range of alternatives, in accordance with CEQA Guidelines Section 15126.6. No changes to the EIR are necessary.

Response 3.7

The Service's responsibilities and authority regarding migratory birds is discussed in the *Regulatory Setting* subsection of Section 4.3, *Biological Resources*, beginning on page 4.3-20 of the EIR. Potential impacts to migratory birds from future development under the 2030 General Plan will be assessed at a project-specific level, following the protocol described in the commenter's letter, during subsequent environmental review of proposed development projects. No changes to the EIR are necessary.





California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
 South Coast Region
 4949 Viewridge Avenue
 San Diego, CA 92123
 (658) 467-4201
<http://www.dfg.ca.gov>

ARNOLD SCHWARZENEGGER, Governor



Letter #4

November 30, 2009

Lucille T. Breese, AICP
 City of Lompoc
 100 Civic Center Plaza
 Lompoc CA 93438-8001
 Fax No.: (805) 875-8375

Subject: Draft Environmental Impact Report for the Lompoc General Plan Update Project, SCH # 2008081032, Santa Barbara County

Dear Ms. Breese,

The Department of Fish and Game (Department), has reviewed the Draft Environmental Impact Report (DEIR) for impacts to biological resources. The proposed project is Phase 1 of an update to the City of Lompoc (City) General Plan (the 2030 General Plan) and includes an update of the Land Use, Housing and Circulation Elements. The existing (1997) General Plan consists of six additional elements (Conservation/Open Space, Noise, Safety, Parks and Recreation, Public Services, and Urban Design), which will be updated in Phase 2 and will be reviewed under a separate CEQA document.

The plan area for the 2030 General Plan encompasses all areas within and outside the City's boundaries. In addition, the General Plan update addresses four unincorporated areas surrounding the City that may be considered for future annexation. These unincorporated expansion areas total approximately 1.56 square miles (995 acres) and include open space, parks, and agricultural fields. Once the General Plan Update is approved by the City, the Local Agency Formation Commission (LAFCO) of the County of Santa Barbara will conduct a formal review of the potential expansion. The proposed expansion areas are describes below.

- The River expansion area is approximately 484 acres located east of the eastern boundary of the City, bisected by the Santa Ynez River. Existing uses in this area include open space and the 45-acre River Park, which includes a recreational vehicle (RV) campground with 35 campsites. Additional development that could occur in the River expansion area under the 2030 General Plan would include expansion of the existing RV campground by 126 full hookup RV campsites.
- The Bailey Avenue Specific Plan expansion area is an approximately 270 acre undeveloped site located on the western boundary of the City along Bailey Avenue. The site is currently composed of agricultural fields. Development that could occur in the Bailey Avenue Specific Plan expansion area under the 2030 General Plan would include residential and commercial uses, as well as public recreational facilities.
- The Miguelito Canyon expansion area is approximately 587 acres located along the southern boundary of the City, of which approximately 165 acres would be included in the proposed Urban Limit Line. Additional development that could occur in the Miguelito Canyon expansion area under the 2030 General Plan would include Rural Density Residential (RDR) land uses within the proposed Urban Limit Line only.

Conserving California's Wildlife Since 1870

4.1



Lucille T. Breese, AICP
 November 30, 2009
 Page 2 of 4

- The Wye Residential expansion area is approximately 10 acres (within the urban limit line) located along the northern boundary of the City, at the intersection of Lompoc-Casmalia Road/Highway 1, H Street/Highway 1 and Purisima Road. The area is currently undeveloped and is bordered by single family residences to the south and east and a church to the north. Additional development that could occur in the Wye Residential expansion area under the 2030 General Plan would include for Low Density Residential (LDR) land uses.

Habitat types with the potential to be impacted by the project include the sensitive habitats Southern Willow Scrub, Southern Cottonwood Willow Riparian Forest, Central Coast Arroyo Willow Riparian Forest, and Maritime Chaparral in addition to coastal scrub, coast live oak woodland, and annual grassland. Wildlife with the potential to be impacted by the project include the Federally and State Endangered Gaviota tarplant (*Deinandra increscens* ssp. *villosa*), least Bell's vireo (*Vireo bellii pusillus*), and southwestern willow flycatcher (*Empidonax traillii extimus*), the Federally Endangered and State Threatened La Graciosa thistle (*Cirsium ioncholepis*), the Federally Endangered and State Special Concern Species southern steelhead (*Oncorhynchus mykiss*) and tidewater goby (*Eucyclogobius newberryi*), the Federally Endangered El Segundo blue butterfly (*Euphilotes battoides allyni*), the Federally Threatened and State Special Concern Species California red-legged frog (*Rana aurora draytonii*), the State Fully Protected and Special Concern Species golden eagle (*Aquila chrysaetos*), the State Fully Protected white-tailed kite (*Elanus caeruleus*), twenty-four additional State Special Concern Species and several species of California Native Plant Society List 1B plants. Measures proposed to mitigate impacts include adherence to goals and policies contained in the existing Lompoc General Plan.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386(a)) and pursuant to our authority as a Responsible Agency (CEQA Guidelines §15381) over those aspects of the proposed project that come under the purview of the Fish and Game Code Section 1600 et seq. As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species.

California Wildlife Action Plan

The California Wildlife Action Plan, a Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the City of Lompoc to minimize impacts to fish and wildlife resources with a focus on these stressors.

The Department also looks forward to working with the City of Lompoc to develop the Conservation and Open Space elements to be contained in the Phase 2 updates. These elements will contain policies and measures to convey an appropriate level of protection for biological resources within the City. An aspect of the proposed Phase 1 updates which was not mentioned in the DEIR is an assurance that the 2030 General Plan will not be implemented prior to approving updates contained in Phase 2, and we request confirmation of this.

4.1

4.2

Lucille T. Breese, AICP
November 30, 2009
Page 3 of 4

Annexation Areas

The Department found some of the depictions of proposed land uses within the annexation areas in the DEIR to be unclear. For example, the land use designation for the southern portion of the proposed river expansion area is shown in Fig. 2-4 as Community Facility. Table 2-1 defines the Community Facility designation to include governmental administrative offices, educational facilities, public safety facilities, hospitals, parks, libraries, museums, transit facilities, airport facilities, utilities, governmental maintenance yards, correctional facilities, and cemeteries. The text, and Fig. 2-5, describes land use and potential development within the river area to be limited to River Park and open space with RV park expansion. The 45 acre River Park should account for only a small portion of the river expansion area. It would appear that more of the river annexation area should be designated open space.

4.3

Also, proposed development within the expansion area is described in the text of the DEIR as being limited to the proposed Urban Limit Line only. However, Fig. 2-5 describes the proposed 26 allowable rural residences in Miguelito Canyon as occurring over the entire 587 acre expansion area. The Department therefore requests clarification of these two apparent inconsistencies.

4.4

Mitigation Measures

Mitigation measures are intended to minimize significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). The DEIR states "The policies and measures outlined in the 1997 General Plan aim to protect sensitive habitats through protection of biologically significant habitats, replacement of these habitats where avoidance is not feasible, and encouragement of restoration and management of natural habitats.", and "Adherence to General Plan policies and compliance with applicable regulatory agency requirements would ensure that impacts remain less than significant." The Department, however, questions the effectiveness of the 1997 General Plan policies to minimize significant adverse impacts resulting from the proposed project.

4.5

For example, 1997 General Plan Resource Element (RME) Measure 7 states "...replacement habitat shall be required at a 1:1 ratio of any biological significant habitat located within the overlay zone which is damaged or disturbed by development." However, in the Department's experience, sensitive habitats such as those listed above are adequately mitigated at ratios greater than 1:1. The Department also commonly requires, through its authority as Responsible Agency under Fish and Game Code Section 1602, mitigation ratios for loss of riparian habitats significantly greater than 1:1. The Department therefore does not agree that adherence to RME Measure 7 would render impacts to sensitive habitats less than significant in all cases. We are hopeful that Phase 2 updates to the Conservation/Open Space elements in the General Plan will result in strengthening of mitigation requirements and greater protections for sensitive habitats.

The DEIR proposes to address impacts to the special status species listed above by inclusion of the following requirement into the existing General Plan: "The City shall encourage the protection of significant biological resources, including sensitive plant and animal species." The Department wishes to inform the City that a California Endangered Species Act (CESA) permit must be obtained if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project.

4.6

Lucille T. Breese, AICP
November 30, 2009
Page 4 of 4

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Environmental Scientist, at (805) 640-3677.

↑ 4.6

Sincerely,



Edmund J. Pert
Regional Manager
South Coast Region

- cc: Ms. Helen Birss
Department of Fish and Game
Los Alamitos, California
- Ms. Betty Courtney
Department of Fish and Game
Santa Clarita, California
- Mr. Martin Potter
Department of Fish and Game
Ojai, California
- Ms. Natasha Lohmus
Department of Fish and Game
Santa Barbara, California
- Ms. Mary Meyer
Department of Fish and Game
Ojai, California
- Ms. Mary Larson
Department of Fish and Game
Los Alamitos
- Mr. Sean Carlson
Department of Fish and Game
La Verne, California
- Mr. Roger Root
U.S. Fish and Wildlife Service
Ventura, California
- Mr. Scott Morgan
State Clearinghouse
Sacramento, California

Letter 4

COMMENTER: Edmund J. Pert, Regional Manager, California Department of Fish and Game, South Coast Region

DATE: November 30, 2009

RESPONSE:

Response 4.1

The commenter provides a summary of the analysis of biological resources contained in the EIR. No further response is necessary.

Response 4.2

The focus of this EIR is on the proposed Phase I General Plan update. The City will take action on the Phase I Elements, certify the EIR, then immediately proceed with updating the Phase II Elements. A Supplemental EIR is anticipated for the environmental review of the Phase II Elements update. In the meantime, existing resource management policies from the 1997 General Plan would apply as would the development standards of the City's Zoning Ordinance, and future development will be evaluated on a project-by-project basis.

Response 4.3

The Community Facilities land use designation within the majority of the River Area (Area B) reflects the current land use, which is an established park. The park is currently owned and operated by the City; however, it is currently in the unincorporated area. The proposed annexation would bring this existing City park into the City's jurisdiction. Additional park development is not anticipated at this time, nor are additional non-park uses. The 2030 General Plan Update does not propose to change the land use designation for this area, nor would it facilitate additional development of this area beyond what is described in the EIR.

Response 4.4

As described on page 2-24 of the EIR, the proposed Urban Limit Line (ULL) comprises 165 acres of the total 587-acre Miguelito Canyon expansion area. The intent of the ULL is to direct additional growth—in this case, residential growth—to areas within the ULL, where they are best served by municipal services. Hence, while the parcels in their entirety are included within the expansion area and could potentially be annexed into the City limits, additional development of up to 25 rural residential units would be limited to the portion of the expansion area within the proposed ULL.



Response 4.5

In response to this comment, the mitigation discussion for Impact BIO-1 has been revised as follows:

Mitigation Measures. The policies and measures outlined in the 1997 General Plan aim to protect sensitive habitats through protection of biologically significant habitats, replacement of these habitats where avoidance is not feasible, and encouragement of restoration and management of natural habitats. In addition, the Santa Ynez River and San Miguelito Creek riparian corridors fall within the jurisdictions of the USACE, RWQCB, and CDFG. As a result, individual permit requirements on a project-specific basis may require a greater replacement ratio for impacted habitat. Additional coordination with these regulatory agencies may be required, including obtaining a Streambed Alteration Agreement from the DFG pursuant to Section 1600 et. seq. of the California Fish and Game Code. Adherence to General Plan policies and compliance with applicable regulatory agency requirements would ensure that impacts remain less than significant. No additional mitigation is required.

Response 4.6

For clarification purposes, the following text has been added to the *Regulatory Setting* section, beginning on page 4.3-20 of the EIR:

California Department of Fish and Game. The CDFG derives its authority from the California Endangered Species Act (CESA; Fish and Game Code Section 2050 et seq) listed under the Fish and Game Code, which prohibits take of listed threatened or endangered species. Take under CESA is restricted to direct killing of a listed species and does not prohibit indirect harm by way of habitat modification. A CESA Permit must be obtained if a future project has the potential to result in take of a species of plant or animal listed under CESA, either during construction or over the life of the project.



DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
 SAN LUIS OBISPO, CA 93401-5415
 PHONE (805) 549-3101
 FAX (805) 549-3329
 TDD (805) 549-3259
<http://www.dot.ca.gov/dist05>

Letter #5

*Flex your power!
 Be energy efficient!*

November 30, 2009

Lucille Breese
 City of Lompoc
 100 Civic Center Plaza
 Lompoc, CA 93436

SB-246 / 001 - var
 SCH 2008081032

Subject: City of Lompoc General Plan Update Draft Environmental Impact Report

Dear Ms. Breese:

Thank you for the opportunity to provide comments upon the subject project's Draft Environmental Impact Report. The Department, as both a responsible and commenting agency envisions a continuing and lasting partnership with the City of Lompoc, as the City sets the conditions for growth and development through 2030. This subject update will include the land use, circulation, and housing elements of the General Plan. Caltrans offers the following comments:

1. Population and Housing; Circulation. Area 1, H Street Corridor Infill. LUE Policies 1.7, 3.5, and 4.2 and CE Policy 1.3 should be inextricably linked to ensure that business and mixed use developments fronting H Street integrate site layout with potential right of way needs to accommodate intersection improvements. 5.1
2. Circulation, page 4.13-19 Central Avenue Extension. The Alternative Circulation Network paragraph provides the only discussion of the Extension and it appears somewhat inconclusive. For instance, on the same page, Impact TC-1 discusses Class I impacts to the Ocean Avenue / A Street intersection with the 2030 General Plan, however, there is no comparative analysis discussing LOS at this or any other intersection, in the event the Extension is constructed. 5.2
3. Circulation, page 4.13-21. CE Policy 1.4 refers to a definition within Policy 1.2. It's not clear where this policy is defined or presented. 5.3
4. Circulation, page 4.13-22 and Executive Summary, pages ES-21 and -23. Mitigation measure TC-1(g) H Street / Central Avenue. Please clarify whether or not this mitigation measure will be pursued given the residual significance after mitigation. 5.4
5. Land Use and Circulation. As discussed within the DEIR, the Area A, Bailey Avenue Specific Plan, is not included in this DEIR with respect to its project and cumulative 5.5

- impacts. This project alone will increase the City's housing stock by 19.2% and population by 18.2%. As indicated in the General Plan DEIR, there are many intersections on Ocean Ave and H St, which will suffer poor performance in the cumulative period, apparently without Area A included, specifically the left turning movements. Does CE Policy 1.3 provide sufficient assurance that these and similar circulation issues will be addressed and improved within the context of the Specific Plan? ↑ 5.5
6. Circulation. The DEIR does not discuss Ocean Avenue west of H St in terms of the city's General Plan vision as requested in the NOP. The Department would encourage the General Plan and DEIR to discuss the enhanced flexibility and unique opportunities in this area if the State relinquished this segment to the City. This would be of particular interest for Area A and portions of Area 1 with respect to local control and flexibility. 5.6
7. Circulation, SR 246 east of Highway 1. Area B and the City's Urban Limit Line has at its southern border that portion of SR 246 which includes the 2-lane bridge spanning the Santa Ynez River. The General Plan and DEIR should include the City's 20 year vision for this segment both with and without the Central Avenue Extension. This is particularly important as the Plan anticipates a population increase of over 8,000 within the existing City Limits (page 4.10-7) as well as the addition to population increases to be realized with the anticipated Annexations. This will total approximately 16,568 persons according to page 4.10-9. 5.7
8. Population / Housing, Jobs / Housing balance. Impact PH-3 and the subsequent discussion relative to job creation based upon one employee per 500 square feet appears to suggest that between the General Plan within City Limits (p. 4.10-10) and Area B (p. 4.10-11), there could be approximately an additional 2,000 head of household jobs required. If these jobs are located outside of Lompoc, SR 246, SR 1, and US 101 may receive significant numbers of trips for which SBCAG's Regional Transportation Plan has not accounted. Please discuss. 5.8
9. General. It does not appear that the City traffic model includes volumes generated by the proposed California Space Center, located near the VAFB main entrance on SR 1. A model run depicting the anticipated traffic load may be beneficial to the City. 5.9
10. Capital Improvement Plan. Although not specifically discussed within the DEIR, it appears that the 2030 General Plan Update provides the impetus to update the City's CIP and the associated AB1600 program. When the City begins that action, Caltrans would like to continue our partnership with you and participate in the planning for the 5.10 ↓

Lucille Breese
November 30, 2009
Page 3

infrastructure needed to support the City's vision for your future, as it pertains to the State Highway System.



5.10

Thank you for consideration of these comments. If you have any questions please call me at your convenience. I can be reached at (805) 549-3632 if you need any clarification on the items above.

Sincerely,

Chris Shaeffer
Caltrans D5 Development Review

Cc: L. Newland, CT

Letter 5

COMMENTER: Chris Shaeffer, California Department of Transportation, District 5,
Development Review

DATE: November 30, 2009

RESPONSE:

Response 5.1

This comment pertains to a General Plan policy, which is a component of the proposed project, and does not directly pertain to an environmental issue. Therefore, no further response is necessary. Nevertheless, this comment is noted and will be forwarded to the appropriate decision-makers for review and consideration.

Response 5.2

The construction of the Central Avenue extension would reduce traffic volumes on Ocean Avenue and Purisima Road, but would increase traffic volumes on Central Avenue. Since Central Avenue serves predominantly residential neighborhoods, those neighborhoods could be negatively impacted. The predominant uses along the existing routes of Ocean Avenue, H Street, and Purisima Road are commercial, business, or undeveloped uses. Additionally the Central Avenue extension would result in traffic impacts at the H Street/Central Avenue intersection.

Response 5.3

Policy 1.2 in the Circulation Element establishes the City's acceptable levels of service (LOS) for intersections. CE Policy 1.2 is referenced in CE Policy 1.4 to indicate the LOS that must be maintained at City intersections in considering new development.

Applicable General Plan policies are listed, where appropriate, in the EIR. A complete list of all proposed Circulation Element policies can be found in the draft 2030 General Plan, available on the City's website (<http://www.ci.lompoc.ca.us/>). The draft Phase I Elements are also included for reference as Appendix A of the EIR.

Response 5.4

Although implementation of Mitigation Measure TC-1(g) may not reduce potential impacts below the City's adopted threshold of significance (LOS C), the recommended improvements would ensure that the SBCAG CMP threshold (LOS D) is met. As stated in the EIR, the H



Street/Central Avenue intersection is under Caltrans' jurisdiction, and if this recommended mitigation measure is implemented in the future, coordination with Caltrans would be required.

Response 5.5

Section 4.13, *Transportation and Circulation*, of the EIR analyzes full General Plan buildout, which includes buildout of each of the four proposed expansion areas, one of which is the Bailey Avenue Specific Plan area. While the Bailey Avenue Specific Plan is currently undergoing separate environmental review, a general programmatic discussion of potential impacts, based on the draft Specific Plan buildout assumptions has been factored in to the General Plan buildout as a whole. As with all proposed development in the City, the Bailey Avenue Specific Plan will be subject to the requirements of Circulation Element (CE) Policy 1.3, as well as Policies CE 1.2 and 1.4, and will be further analyzed in a separate EIR being prepared for the Specific Plan.

Response 5.6

Caltrans' suggestion of relinquishing West Ocean Avenue to the City was not a component of the proposed project, and therefore was not addressed in the EIR. This comment does not pertain to an environmental issue. Therefore no further response is necessary. Nevertheless, this comment is noted and will be forwarded to the appropriate decision-makers for review and consideration.

Response 5.7

Please see the response to Comment 2.1. Traffic volumes cited in the DEIR include both buildout of the Lompoc General Plan and regional traffic growth. The existing daily (weekday) traffic volume on the SR 246 bridge over the Santa Ynez River is 9,300 vehicles. With the buildout of the existing City of Lompoc General Plan, the daily volume is forecast to increase to 13,300 vehicles per day in the year 2030. The buildout of the proposed General Plan land uses results in the volume increasing to 15,100 vehicles per day in the year 2030. Using a capacity of 18,000 vehicles per day, the buildout of the proposed General Plan would result in LOS D conditions on the segment of SR 246 over the Santa Ynez River. With the buildout of the proposed General Plan and the installation of the Central Avenue extension including the new bridge over the Santa Ynez River, the traffic volume would decrease to 9,700 vehicles per day on this segment.

Response 5.8

Please see the response to Comment 2.1. The transportation demand model accounts for growth in employment and households within the City of Lompoc and the region.



Response 5.9

Please see the response to Comment 2.1. The SBCAG model was used in the development of the City of Lompoc transportation forecasting model. The SBCAG model includes growth at Vandenberg Air Force Base.

Response 5.10

Comment noted. Should the City's CIP and associated AB1600 program be updated in the future, the City will coordinate with Caltrans regarding the State Highway System, and any infrastructure needed to support the City's vision for the future.



Letter #6

County of Santa Barbara



Michael F. Brown
County Executive Officer

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

Executive Office

November 30, 2009

Lucille Breese, AICP, Planning Manager
City of Lompoc
100 Civic Center Plaza
Lompoc, Ca 93436

FAX: 805-736-5347
Email: l_breese@ci.lompoc.ca.us

RE: Notice of Availability of a Draft Environmental Impact Report-City of
Lompoc General Plan Update

Dear Ms. Breese:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the City of Lompoc General Plan Update. At this time, the County is submitting the attached letters from the Public Works Department and the County Fire Department. Additional comments for your consideration are provided below:

Project Description

The Draft EIR project description should include a discussion of whether the proposed "potential annexation areas" and "unincorporated expansion areas" represent an expansion of the City of Lompoc Sphere of Influence. This discussion should also include identification of any required detachments from the Santa Barbara Fire Protection District and annexation to any community service districts.

2.2 Geographic Extent of the Plan Area

The Draft EIR should indicate whether the "potential annexation areas" and "unincorporated expansion areas" represent City of Lompoc Sphere of Influence expansion areas (p. 2-1). Accordingly, the various references to these areas throughout the document which include descriptions such as "Draft Annexation Areas" and "Expansion Areas," should indicate that they are proposed Sphere of Influence expansion areas if applicable.

2.4.3 General Plan Land Use Designations

The County requests that the Draft EIR clearly state whether the City of Lompoc land use designations applied to unincorporated areas within the proposed annexation/expansion areas are part of a General Plan prezone action required by LAFCO pursuant to Government Code 56375

6.1

6.2

C (7).

↑6.2

The Draft EIR should include additional parcel information for all APNs within the proposed annexation/expansion Area B-River Area, Area C-Miguelito Canyon Area, and Area D-Wye Residential Area. This information should include identification of all unincorporated Assessor Parcel Numbers (APN) within the annexation/expansion areas, acres per APN, present use per APN, Santa Barbara County land use designation (du/acre) per APN, Santa Barbara County Zoning per APN, and City of Lompoc proposed land use designation per APN.

6.3

Figure 2-4 Land Use Map

Area C-Miguelito Canyon contains only partial land use designation information. While Figure 2-4 indicates that “Allowable land uses for given parcels of land cannot be determined solely by reference to this map,” the absence of land use designation information for significant portions of Area C from Figure 2-4 makes it difficult to determine if there exist other land use designations other than RDR-Rural Residential. The Draft EIR should clarify if Area C contains any other land use designations other than RDR and identify these designations, if appropriate, throughout the document.

6.4

Area D-Wye Residential is designated Low Density Residential (LDR) on Figure 2-4. This map, and all other references throughout the Draft EIR if appropriate, should clarify the density for the Low Density Residential Designation within Area D (i.e. LDR 2.5, LDR 4.6 or LDR 6.2). The density for LDR is unclear as the Draft EIR identifies three sub-categories for LDR: LDR 2.5, LDR 4.6 and LDR 6.2.

6.5

4.8.2 Land Use and Agriculture-Impact Analysis

The Draft EIR contains the following statements:

Impact LU-2 The 2030 General Plan proposes annexation of four unincorporated areas adjacent to the City. The proposed expansion areas could conflict with some provisions of the County’s Standards for Annexation to Cities. However, LAFCO must make the final determination of consistency (p.4.8-16).

6.6

Impact LU-2 describes potential conflict with the *County’s Standards for Annexation to Cities*. The Draft EIR should clarify if the document referenced as the *County’s Standards for Annexation to Cities* is actually a reference to the Santa Barbara County LAFCO standards for annexation to cities. If this document is not referencing LAFCO standards the Draft EIR should provide additional detail as to what document this is referencing. LAFCO determination of consistency for proposed annexations is not an environmental impact but a statement of a potential regulatory inconsistency. The Draft EIR should analyze the environmental impacts associated with the annexation/expansion areas A, B, C and D and describe these impacts and mitigation measures in Section 4.8 Land Use and Agriculture. Pursuant to CEQA §15126.4 (a)(1)(B), appropriate mitigation should be included to address land use impacts associated with the proposed annexation/expansion areas. If mitigation measures are found to be infeasible the Draft EIR should contain a discussion of these measures and why they have been determined to be infeasible.

6.7

The Draft EIR contains the following statements for Impact LU-3:

Impact LU-3 Future development in accordance with the 2030 General Plan would occur in areas that contain prime agriculture soils and/or important farmland. Although the Bailey Avenue Specific Plan expansion area is the only area of proposed land use change currently used for agriculture, both the River and Miguelito Canyon expansion areas contain prime soils which could be feasibly farmed. Buildout of these three expansion areas would therefore result in Class I, significant and unavoidable impacts related to agricultural conversion. Buildout within the City Limits and the Wye Residential expansion area would result in Class III, less than significant, impacts to agricultural conversion (4.8-27).

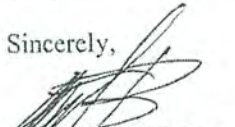
6.8

Mitigation Measures. No mitigation is required for buildout within the existing City Limits or the proposed Wye Residential Expansion area. No mitigation is feasible for buildout of the proposed Bailey Avenue Specific Plan, River or Miguelito Canyon expansion areas which would reduce impacts to a level of insignificance (p. 4.8-27).

The Draft EIR should include a discussion that identifies the mitigation measures considered to reduce the impacts of the conversion of prime agriculture soils and/or important farmland for Impact LU-3. Additionally, this discussion should explain why these mitigation measures were found to be infeasible to reduce the impacts to a level of insignificance resulting in significant and unavoidable impacts for the Bailey Avenue Specific Plan, River and Miguelito Canyon expansion areas.

The County has no further comments on this project at this time and looks forward to continued dialogue on future projects. If you should have further questions, please do not hesitate to contact my office directly, or Derek Johnson, Director in the Office of Long Range Planning at (805) 568-2072.

Sincerely,


Michael F. Brown
County Executive Officer

cc: Joni Gray, Supervisor, 4th District
Doreen Farr, Supervisor, 3rd District
Glenn Russell, Director, Planning and Development Department
Scott McGolpin, Director, Public Works Department
Derek Johnson, Director, Office of Long Range Planning
Richard Todd, Fire Marshall, County Fire Department

Attachments Public Works Department-Letter dated November 19, 2009
County Fire Department-Letter dated November 24, 2009

ATTACHMENT A

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

November 19, 2009

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

RE: Draft EIR City of Lompoc General Plan Update

Dear Ms. Breese:

We have reviewed the above referenced document and offer the following comments:

Given that a city generally receives more maintenance funding per lane-mile than a county, it does not make fiscal sense for a county to maintain a roadway which adjoins and primarily serves a city. Therefore, we recommend the following:

- The portion of Harris Grade Road between Purisima Road and Burton Mesa Road should be annexed into the City of Lompoc concurrently with this General Plan Update.
- McLaughlin Road, Bailey Road, and any other roadway section that runs adjacent to a City parcel, should be annexed into the City.

6.9

The County Public Works Department may have further comments as the plan progresses. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Bret Stewart".

Bret A. Stewart, P.E.
Senior Development Engineering Manager

Cc: Dace Morgan, Deputy Director, Transportation
Will Robertson, Transportation

AA /EEO Employer

Thomas D. Fayram, Deputy Director
Rochelle Camozzi, Chief Financial Officer

Dace B. Morgan, Deputy Director
Michael B. Emmons, County Surveyor

Mark A. Schleich, Deputy Director

ATTACHMENT B



Fire Department

"Serving the community since 1926"

HEADQUARTERS

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

Michael W. Dryer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

November 24, 2009

Ms. Susan Curtis
Senior Planner
County of Santa Barbara
Office of Long Range Planning
30 East Figueroa Street
Santa Barbara, CA 93101

Dear Ms. Curtis:

SUBJECT: Lompoc General Plan Update DEIR

Any work on a known remediation site or discovery of hazardous materials during excavation must be reported to the County Fire Department Hazardous Materials Section, 805-686-8170.

6.10

As always, if you have any questions or require further information, please call 805-681-5523 or 805-681-5500.

In the interest of life and fire safety,

Rick Todd
Fire Marshal

RJ: mkb

Letter 6

COMMENTER: Michael F. Brown, County Executive Officer, County of Santa Barbara
Executive Office

DATE: November 30, 2009

RESPONSE:

Response 6.1

The terms “draft annexation areas” and “proposed expansion areas” are used interchangeably throughout the EIR to describe the four potential areas where the City of Lompoc may decide to annex additional parcels, and expand the City Limits. As depicted on Figure 2-5, *Proposed Land Use Changes*, the 2030 General Plan Update does not propose to expand the City’s Sphere of Influence beyond these four potential annexation areas. The comment regarding associated detachments from the Santa Barbara Fire Projection District and any other applicable community service districts is noted. This would be a component of the formal annexation request and application to LAFCo, should annexation of any or all of the proposed expansion areas proceed,

Response 6.2

The land use designations described throughout the EIR are being proposed as part of the 2030 General Plan Update, and are not a part of a prezone action. Should the City decide to move ahead with the annexation of one or more of the proposed expansion areas through LAFCo, the City will prezone the parcels to be consistent with the proposed land use designations.

Response 6.3

This comment does not directly relate to an environmental issue that would affect the analysis or conclusions in the EIR. Therefore the requested information has not been incorporated into the Final EIR. It should be noted that this information will be provided as part of the annexation package presented to LAFCo in the future, should the City decide to pursue annexation of any of the proposed expansion areas.

Response 6.4

The Rural Density Residential (RDR) land use designation is proposed for the entirety of the Miguelito Canyon Expansion Area, as noted in the Section 2.4.3, *General Plan Land Use Designations*, on page 2-24 in the discussion of the Miguelito Canyon Expansion Area, as well as in Table 2-1 where the RDR Land Use designation is defined, and on Figure 2-5, *Proposed Land Use Changes*, Figure 2-4 has been revised accordingly.



Response 6.5

The Wye Residential Area (Expansion Area D) has a proposed Land Use Designation of LDR 6.2. As described in Section 2.0 of the EIR, *Project Description*, the other LDR densities (2.5 and 4.6) apply to the Burton Mesa Specific Plan area only. The legend for Figure 2-4, *Land Use Map*, has been revised accordingly.

Response 6.6

For clarification purposes, Impact Statement LU-2, in Section 4.8, *Land Use and Agriculture*, has been revised as follows:

Impact LU-2 The 2030 General Plan proposes annexation of four unincorporated areas adjacent to the City. The proposed expansion areas could conflict with some provisions of the Santa Barbara County's LAFCo's Standards for Annexation to Cities. However, LAFCo must make the final determination of consistency.

Response 6.7

Physical environmental impacts associated with annexation of the four draft expansion areas are addressed throughout each subsection of Section 4.0, *Environmental Impact Analysis*. The analysis contained in Section 4.8, *Land Use and Agriculture*, does not duplicate the analysis of each of the potential environmental issues, but rather focuses on general land use and agricultural compatibility impacts, and policy consistency issues associated with incorporation of these potential annexation areas. For this reason, the discussion under Impact Statement LU-2 (refer to Response 6.6 above) is appropriate for a program-level analysis of the proposed General Plan. Specific conflicts with annexation standards or policies and any necessary revisions or mitigation measures may be identified when LAFCo reviews the final annexation proposal according to their adopted standards. No changes to the EIR are necessary.

Response 6.8

In response to this comment, the following mitigation measure has been added to Section 4.8 *Land Use and Agriculture*, under Impact LU-3, in order to reduce farmland conversion impacts to the extent feasible.

Mitigation Measures. No mitigation is required for buildout within the existing City Limits or the proposed Wye Residential Expansion area. ~~No The following mitigation measure is feasible required~~ for buildout of the proposed Bailey Avenue Specific Plan, River or Miguelito Canyon expansion areas ~~which would reduce impacts to a level of insignificance.~~



LU-3 Purchase of Agricultural Conservation Easements (PACE) Program.
The City shall implement a program that facilitates the establishment and purchase of on- or off-site Agricultural Conservation Easements for prime farmland and/or important farmland converted within the expansion areas, at a ratio of 1:1 (acreage conserved: acreage impacted). A coordinator at the City shall oversee and monitor the program, which will involve property owners, developers, the City, and potentially a conservation organization such as The Land Trust for Santa Barbara County. Implementation of a PACE program shall be coordinated with similar efforts of Santa Barbara County.

Significance After Mitigation. Impacts within the existing City Limits or the proposed Wye Residential expansion area would remain less than significant. Impacts within the Bailey Avenue Specific Plan, River and Miguelito Canyon expansion areas would be reduced to the extent feasible; however this mitigation measure does not necessarily guarantee a net increase in farmland, and therefore impacts would be remain significant and unavoidable.

Response 6.9

This comment pertains to the Circulation Element, which is a component of the proposed General Plan update. This comment does not directly pertain to an environmental issue; therefore no further response is necessary. Nevertheless, this comment is noted and will be forwarded to the appropriate decision-makers for review and consideration.

Response 6.10

In response to the County Fire Department's comment, the following text has been added to mitigation measure HAZ-1 in Section 4.6, *Hazards and Hazardous Materials*:

HAZ-1 Previously Unidentified Hazardous Materials. Any work on a known remediation site or discovery of hazardous materials during excavation must be reported to the Santa Barbara County Fire Department Hazardous Materials Unit (HMU). In the event that hazardous waste and/or materials, including chemical odors or stained soils, are encountered during construction of future development sites, the following actions shall be taken by the applicant or authorized agent thereof: (1) all work in the vicinity of the suspected contaminant will be halted; (2) all persons shall be removed from the area; (3) the site shall be secured under the direction of the County Fire Department HMU staff; and (4) the City of Lompoc Hazardous Waste/Materials Coordinator shall be notified. Work shall not recommence until such



time as the find is evaluated and appropriate measures are implemented as necessary to the satisfaction of the California Department of Toxic Substances Control.



JANICE KELLER
P.O. Box 504
Lompoc, CA 93438-0504
(805) 735-1408
jkeller2002@msn.com

Letter #7

November 30, 2009

Lucille T. Breese, AICP
Planning Manager
100 Civic Center Plaza
Lompoc, CA 93436

E-mailed

RE: General Plan Update, Draft EIR

Dear Lucille,

As you know (but others who are reading this may not), I was Chair of the City Planning Commission during the creation of the 1997 General Plan. Since then, both as a Council member and as a private citizen, I have followed the numerous amendments to that plan and the process for the update. I am glad that the long delay finally has ended.

I have completed reviewing the Draft EIR. Following are my comments (in no particular order of significance):

Please note that comments made in regard to any specific policy, section, mitigation or item extend to all mention of said policy, section, mitigation or item throughout the DEIR.

Any "mitigation measure" that calls for a plan (i.e. the Odor Abatement Plan in AQ-3(a)) is not a true mitigation measure unless the plan calls for action/s which will mitigate and that action is required as part of the mitigation measure.

A "mitigation measure", such as AQ-4(b), which states "The City shall consider ..." (emphasis added) does not mitigate. "The City shall require..." does mitigate.

Throughout the mitigation measures (and the document as a whole), numerous references are made to goals, policies and measures in the 1997 General Plan. Are those goals, policies and measures going to be restated word for word in the update since they are being used as mitigation measures? In other places, references are made to General Plan policies (no year specified) or 2030 General Plan policies. Consistency would be valuable. See also page 1-6 re documents listed under "Incorporation by Reference" where the 1997 General Plan is not listed.

Also, references to "existing Zoning Ordinance" (i.e. mitigation measure for LU-1) are vague. The existing Zoning Ordinance is woefully out of date. Does "existing" refer to "now" or "in existence at the time the issue arises"? See also page 1-6 re documents listed under "Incorporation by Reference" where the Zoning Ordinance is not listed.

7.1

7.2

7.3

7.4

Any impact where payment of impact mitigation fees to reduce the impact to Class III (i.e. Public Safety 1, 3 and 5) should be reconsidered. These fees would need to be very, very high to actually mitigate the impacts. Therefore, these impacts should be elevated to **Class I** requiring statements of Overriding Consideration.

7.5

Traffic/Circulation 1 - Mitigation TC-1 (a-c) - Will the installation of traffic signals at these intersections increase noise levels and further deteriorate air quality? If so, are these new impacts mitigated? Also, installation of traffic signals along V Street, a residential street, is not a good idea. Please rethink this mitigation measure.

7.6

Utilities and Service System - U-1 and U-3 - Since this general plan covers the next 20 years, the projected increase in water demand should be elevated to **Class I**. We really have no way of knowing whether we will be facing drought conditions in the next 20 years and/or if the upstream users do something to cause less water to enter our aquifers.

7.7

Page ES-13 - heading for Hazards and Hazardous Materials was omitted.

7.8

Page ES-15, Page 4.7-10 - HWQ-2 - states the "northern" portion of the City is located within the dam inundation hazard area. Since the City has moved north into the hills, rewording to state "north central" portion would be more appropriate and accurate.

7.9

Page 2-1, 2.2 - a. refers to three annexation areas and b. refers to four. Please clarify.

7.10

Figure 2-2 - this figure is difficult to read. The Bailey Avenue Specific Plan area is not shown as a "draft annexation area." Does this mean that individual property owners must request and pay for annexation if they so desire?

7.11

Page 2-5, 2.3 - please add a sentence stating that the 1997 General Plan has been amended by the City Council ____ (please fill in the number) times since 1997. This would give a more accurate picture of the way things stand.

7.12

Figure 2-4 - the figure is unclear as to the designation for the easternmost parcel(s) near River Park. Please clarify.

7.13

Figure 2-7 and page 2-24 - Expansion Area B - does this area include the old drive-in and Valley Rock?

7.14

Page 2-33 - Housing Element 2.4.5 - Paragraph 2 - please rewrite sentence "The City needs to provide..." to "The City needs to provide the capacity for..."

7.15

Page 4.1-11 - Aesthetics - Expansion Area A - Paragraph 3 states "Ocean Avenue/State Route 246, which borders the site to the south..." is incorrect. The Bailey Avenue Specific Plan area extends to Olive Avenue. Please correct.

7.16

Page 4.1-14 - LUE Policy 1.3 (also LUE Policy 5.2 and others) - This policy includes the statement "west of Bailey Avenue" which assumes that the Bailey Avenue corridor will be included in the GP revisions. I think this is a policy decision that is yet to be made. The preferred wording is "west of the City limits".	7.17
Page 4.1-15 - LUE Policy 5.1 - The way this policy is written makes is sound like the City shall do things in the alternative (or, or, or...). Please rewrite so that it is clear that the City shall do all of the included items.	7.18
If Expansion Areas A-D are included and annexed to the City, then there will be an interim, possibly lengthy period during which active ag lands will be in the City. Was this considered? Is there a land use designation for such? Do the impacts and mitigations cover this?	7.19
LU Policy 2.1 - Please strengthen the policy so that it requires, not just encourages, new development to be designed in such a way that pedestrians and bicycles are encouraged and car trips minimized (for example, face ingresses and egresses inward to the City; no walled mini-communities; if walls, access through them).	7.20
Air Quality - If the Bailey Avenue Specific Plan Area were deleted, would the AQ-1 impact still be Class I? I understand that Cumulative Impacts would remain at Class I.	7.21
Page 4.3-33 - Mitigation Measures BIO 2(a, b) - Both of these mitigation measures "shall encourage the protection" which differs greatly from "shall protect". Why was the "encourage" language selected and how would the City "encourage the protection"?	7.22
Page 4.3-36 - RME Policy 2.2 - include in what is to be protected "wildlife movement corridors".	7.23
Page 4.5-5 - Geology - top of page - There is a sentence that states "There are no historically active, active or potentially active faults within or in the near vicinity of the City of Lompoc". Is this still a true statement in light of the recent activity about 9 miles offshore which rattled windows and doors in Lompoc? Does the recent activity offshore change the analysis in any way?	7.24
Page 4.5-18 - SE Policy 4.2 - I thought the City did away with requiring property owners to reinforce their buildings. If I am correct, this policy needs to be amended.	7.25
Figure 4.6-1 - on the legend, there is a gray marker labeled "Urban Unzoned". However, on the map, the gray area is the existing City which is clearly zoned. Please clarify.	7.26
Page 4.6-20 - HAZ-1 - This mitigation measure says that "(3) the site shall be secured under the direction of the County Fire Department ". It may be explained elsewhere as to why the County would be the lead agency on this. If it isn't, please add an explanation.	7.27

- Page 4.6-23 - Expansion Area D - refers to "Purissima" Road as "La Purissima" Road. Please fix here and other places where this error may occur. | 7.28
- Page 4.17-8 - Expansion Area A - includes the statement that "no portion of the Bailey Avenue Specific Plan Area is within the designated 100-year flood plain. Is this statement accurate since a portion of the Plan Area is across the street from the V Street/Miguelito Channel which appears to be within the 100-year flood plain? | 7.29
- Page 4.8-13 - last paragraph - reference is made to the 200-foot wide open space setback. LUE Policy 7.6 (p. 4.8-15) requires a permanent buffer of undetermined size. On what studies, if any, is there a determination that 200 feet will be a significant buffer? Is reference to these studies made in the DEIR? Is this a noise buffer, a pesticide drift buffer, or ??? | 7.30
- Page 4.8-16 - Impact LU-2 - This impact was not given a Class level. | 7.31
- Page 4.9-10 - Do the noise level increases along V Street take into consideration the proposed traffic lights along this roadway? | 7.32
- Page 4.10-6 - LUE Policy 3.1 - What numbers/criteria is/will be used to ensure that there is a sufficient and balanced supply of land for each of the uses? In other words, what constitutes a "balance"? | 7.33
- Page 4.10-10 - LUE Policy 4.2 - This policy seems inconsistent with the proposal to mitigate impacts on police, fire and the library by assessing mitigation impact fees. Clearly, assessed fees and having services available at the time of development aren't the same. Please clarify. | 7.34
- Page 4.10-11 - Expansion Area A - What portion of the land covered under the Bailey Avenue Specific Plan is for the 228,700 square feet of commercial space? Will this be new commercial space or use of existing buildings? What type of jobs (457?!) will be created. Is the deletion of farming jobs now in existence factored in? | 7.35
- Page 4.10-13 - LUE Policy 3.7 - this policy is too narrow. All development adjacent to the City or in its view shed should be reviewed and not just for negative fiscal impact. Who would make the determination if review should be undertaken? | 7.36
- Page 4.11-8 - Community Library - the description refers to the main branch as the "downtown library". The library is not "downtown". Please fix. Also, should the Charlotte's Web project be mentioned? | 7.37
- Page 4.11-12 - Expansion Area C - this section states that "new or expanded fire facilities would therefore not be needed..." Nothing addresses whether new equipment might be needed to fight fires in this area. Shouldn't this be addressed? | 7.38
- Page 4.11-14 - PSE Policy 5.2 - what if such agreements become prohibitively expensive? | 7.39

- Regarding mitigation impact fees, at what point in time are the fees imposed - annexation, plan approval, ??? Does the time of imposition change the amount of fees? | 7.40
- Page 4.12-1 - last paragraph - describes Miguelito County Pard as "located in Lompoc". Please correct. | 7.41
- Figure 4.12-1 & Table 4.12-1 - shows/refers to the Lompoc Valley Community Center where it is no longer. Please correct with current information and accurate information. | 7.42
- Page 4.12-8, 9, 10 - the payment of in-lieu fees doesn't mitigate the impact unless such fees are in turn used to build parks. Will the fees be sufficient to buy land and maintain park facilities in the new areas? | 7.43
- Page 4.12-11 - PRE Policy 1.5 - please delete the reference to "State Burton Mesa Chaparral Preserve". | 7.44
- Page 4.12-12 - PRE Policy 3.2 & 4.1- please add the word "maintain", i.e. The City shall maintain, improve ... | 7.45
- Page 4.13-16 - Transit System - mentions COLT is currently designing a Transit Center. Is this fact? If so, please include the location. | 7.46
- Page 4.13-19 - Impact TC-1 - This impact focuses on Ocean and A. Is this the only intersection which will be designated as a Class I impact. | 7.47
- Page 4.13-41 - first paragraph - This paragraph is a bit confusing. Both the H and Central and the A and Ocean intersections fall under the SBCAG CMP, but the last sentence is in the singular. | 7.48
- Page 4.13-45 - CE Goal 2 - see my earlier comments regarding the installation of traffic signals along V Street. The "mitigation" measure clearly conflicts with this Goal. | 7.49
- Page 4.13-47 - CE Policy 3.10, last sentence - Why is this requirement limited to City-sponsored redevelopment projects? Shouldn't it extend to all City-sponsored projects? Also, "considering" something doesn't require any action in furtherance. Can the policy be made a bit stronger? | 7.50
- If Expansion Area B is annexed, wouldn't this add additional trips across Robinson Bridge (which I didn't see mentioned in the DEIR)? Should this be considered or at least mentioned? | 7.51
- Page 4.14-18 - Expansion Area D - is this area in the Mission Hills Community Services District service area? If yes, would the City need to enter into another agreement with MHCS D similar to the one for the Wye area? Should this be mentioned? | 7.52

Page 6
Keller
November 30, 2009

Page 4.14-33 - PSE Policy 15.2 - This is from the 1997 GP and will need to be rewritten for the 2030 GP.

7.53

Thank you in advance for your consideration of my comments. You will note that I am not commenting specifically at this time on Appendix A, Draft General Plan Elements. Since there will be many future discussions on the language in these, I will weigh in on them later. Also, please let me know the date, time and place of all future Planning Commission and City Council meetings where the DEIR and/or the General Plan will be discussed.

7.54

Sincerely,

/s/Janice Keller

Letter 7

COMMENTER: Janice Keller

DATE: November 30, 2009

RESPONSE:

Response 7.1

The Odor Abatement Plan called for in Mitigation Measure AQ-3(a) is required to include “*Policy and procedure describing the actions to be taken when an odor complaint is received, including the training provided to the responsible party on how to respond to an odor complaint*”. The requirements of the plan are intentionally broad, because this plan will be tailored to the specific type of land use. The actions described in the Odor Abatement Plan will be reviewed to ensure that potentially significant impacts are identified and mitigated, prior to the City’s approval of the application. No changes to the EIR are necessary.

Response 7.2

The terminology used in Mitigation Measure AQ-4(b) implies that the City will take all feasible types of greenhouse gas reduction measures that are proposed into consideration. Since the life of this EIR will span over the 20 years until estimated General Plan buildout, the flexibility provided by this mitigation measure allows new and innovative techniques to be considered and utilized as the technology becomes available, rather than requiring specific reduction measures that are currently available. No change to the EIR is necessary.

Response 7.3

Throughout the EIR, the complete text of existing (1997) General Plan policies and measures are included whenever these policies are relied upon to reduce potential impacts. The commenter does not point out specific instances where the additional information would be appropriate, therefore, no changes to the EIR have been made. It should be noted that to the extent that a 1997 General Plan policy is relied upon as mitigation, it will be included in the Update, or refined as part of the subsequent update of the Phase II General Plan Elements.

Response 7.4

The existing City Zoning Ordinance (2002) was referenced during preparation of the EIR (refer to Section 7.0 *References*). However, to ensure the greatest flexibility of the EIR over the life of the General Plan, references to the “Zoning Ordinance” assume that the most recent zoning ordinance (as amended) available at the time will be applied when future development is proposed. No change to the EIR is necessary.



Response 7.5

In accordance with Section 65995(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, pursuant to CGC §65995(h), impacts relating to school capacity would be less than significant with payment of fees.

On a similar principle, the City has determined that payment of development impact fees for demand on other public services is the most effective way to ensure that individual projects pay for their fair share of new or improved facilities that may be necessary in the future. These rates are periodically reviewed and modified to ensure that they adequately mitigate a specific project's contribution to potential impacts to these facilities. The analysis of the fee rates applied to future development is outside of the scope of this EIR. No changes to the EIR are necessary.

Response 7.6

The installation of traffic signals required by Mitigation Measure TC-1(a-c) was analyzed and determined to maintain acceptable Levels of Service (LOS) and improve City-wide traffic flow over the life of the plan. With the addition of traffic signals, average vehicle speeds on these roadways will decrease, resulting in a corresponding reduction in roadway noise. By improving traffic flow, vehicle emissions are also reduced on a regional scale. The commenter also expresses general concerns about the installation of a traffic signal on V street, but does not raise any specific issues with the EIR, or provide evidence to support the concern. Therefore, no additional response is possible.

Response 7.7

The analysis of water supply impacts is based on the Lompoc Water Resources Study 2008, included as Appendix I of the EIR. As discussed in Section 4.14 *Utilities and Service Systems*, new development is required to offset the projected water usage by participating in and providing water conservation measures that decrease existing water demand by an amount equal to the calculated project demand (Title 13 Public Services, Chapter 13.04, Section 13.04.070 of the City Code). The analysis takes into account that retrofits and other conservation measures represent a finite opportunity to decrease existing demand and cannot be expected to fully offset population growth indefinitely. Therefore the water demand analysis in this EIR is based on a worst-case assumption that demand caused by future population growth is not offset by further reductions in water use by existing customers.



An analysis of cumulative water-level declines during the 1984–1990 drought indicated that declines under 2030 General Plan buildout conditions would not likely be large enough to impair the yield of the City’s wells or other nearby wells (Lompoc Water Resources Study 2008). Therefore, the groundwater supply is adequate to meet the additional demand associated with the 2030 General Plan without causing overdraft or temporarily impairing the capacity of the City’s well field. Refer to the discussion under Impact U–1 for additional information. The commenter provides no evidence to support the statement that impacts would be significant and unavoidable during drought conditions. Therefore, no change to the EIR is warranted.

Response 7.8

The comment refers to a typographical error in the Executive Summary table. In response to this comment, the heading for Hazards and Hazardous Materials has been added on page ES–13.

Response 7.9

For clarification purposes, Impact HWQ–2 in Section 4.7 *Hydrology and Water Quality*, has been revised as follows:

Impact HWQ–2 ~~The northern portion~~ majority of the City of Lompoc is located within an identified dam inundation hazard area associated with the Bradbury Dam. There is potential to expose people and structures to associated dam inundation hazards. However, compliance with an existing Hazard Mitigation Plan would ensure that impacts remain Class III, *less than significant*.

This revision does not affect the analysis or conclusions contained in the EIR.

Response 7.10

For clarification purposes, the following text on page 2–1 in Section 2.0 *Project Description*, has been revised:

a. Incorporated City Limits. As of 2008, Lompoc’s corporate boundaries encompass approximately 11.65 square miles, or 7,456 acres of land. The City is seeking annexation of land outside the current City limits as part of the 2030 General Plan. ~~There are three annexation areas, portions of which are located within the existing Sphere of Influence and.~~ These four possible expansion areas would be annexed over the life of the General Plan, and are described in more detail below.



Response 7.11

Contrary to the commenter's statement, Figure 2-2 *Plan Boundaries*, in the EIR depicts the Bailey Avenue Specific Plan Area (Area B) as one of the four "Draft Annexation Areas" outlined in purple. These four areas are more clearly depicted in Figure 2-5 *Proposed Land Use Changes*. No changes to the EIR are necessary.

Response 7.12

For clarification purposes, the following text in Section 2.0 *Project Description*, has been added (page 2-5):

The Lompoc City Council adopted the current General Plan in 1997. The 1997 General Plan (as amended) has since served as a policy document that guides land use decisions in the City.

Response 7.13

As noted on Figure 2-4 *Land Use Map*, "This is one of a series of maps and textual material, which, combined, constitute the development policies of the city of Lompoc. Allowable land uses for given parcels of land cannot be determined solely by reference to this map." Questions about designations for individual parcels may be directed to the City Planning Department. No changes to the EIR are necessary.

Response 7.14

Draft Annexation Area B (River Area) includes several parcels north of the Santa Ynez River, including the former Valley Drive-In Theater and Valley Rock properties. The properties of interest to the commenter are within Annexation Area B as depicted in both Figures 2-4 and 2-5 in Section 2.0, *Project Description*, Figure 2-5 depicts properties within Annexation Area B as shaded in either light green or darker green, with the darker green corresponding to the City-owned portion of this area. The properties of interest to the commenter are shaded in light green on Figure 2-5.

Response 7.15

For clarification purposes, the following text in Section 2.4.5 *Housing Element*, contained in the EIR Project Description, has been revised:

Based on vacant parcels throughout the City, the current land use map provides a sufficient amount of multi-family residential land use designations to meet the RHNA allocation for the 2007 to 2014 period. The City needs to provide the capacity for 516 new units to meet the RHNA allocation; the number of currently



vacant parcels would accommodate up to 1,247 multi-family units (refer to Table 2-2). As such, the City would not need to designate additional land uses to meet the allocation. It should be noted that the H Street Corridor Infill area and proposed annexation areas would provide an additional 923 multi-family residential units.

Response 7.16

For clarification purposes, the following text in Section 4.1 *Aesthetics*, (page 4.1-11) has been revised:

Development of this expansion area would be visible from Ocean Avenue/State Route 246, which ~~borders the site to the south~~ runs through the southern portion of the site, and Floradale Avenue, which is located approximately ½ mile from the site's western boundary (refer to Figure 4.1-1).

Response 7.17

This comment pertains to a General Plan policy, which is a component of the proposed project. This comment does not directly pertain to an environmental issue, therefore no further response is necessary. Nevertheless, this comment is noted and will be forwarded to the appropriate decision-makers for review and consideration.

Response 7.18

Please refer to Response 7.17 above.

Response 7.19

Based on existing (1997) General Plan Land Use Designations, Miguelito Canyon (Expansion Area C) is the only proposed expansion area currently designated for agricultural use (AG). As discussed in Section 2.4.3, *General Plan Land Use Designations*, future development of the Bailey Avenue Specific Plan Area (Expansion Area A) would be subject to land use designations set forth in the specific plan. As discussed in Section 2.4.3, Expansion Area C would be designated Rural Density Residential (RDR) and would have future residential development restricted to areas within the Urban Limit Line (ULL). More information on allowable uses within this land use designation can be found in the draft Land Use Element, which is included in Appendix A of the EIR. The discussion of agricultural lands conversion at 20-year General Plan buildout is discussed in Section 4.8, *Land Use and Agriculture*. While the impact analysis evaluates full buildout, it is acknowledged that buildout rates and extent are subject to property owner preferences and market forces.



Response 7.20

Please refer to Response 7.17 above.

Response 7.21

The commenter asks whether Impact AQ-1 would remain Class I, *significant and unavoidable*, without the inclusion of the Bailey Avenue Specific Plan Area. The discussion of Impact AQ-1, under the heading *General Plan Buildout within City Limits* describes the impacts from buildout of the General Plan without any of the annexation areas, and hence excludes the Bailey Avenue Specific Plan Area. This discussion includes a finding that the General Plan would have a Class I, *significant and unavoidable* impact without the inclusion of the Bailey Avenue Specific Plan Area or any of the other annexation areas. The *Cumulative Development* discussion is the portion of the impact discussion that examines the potential impacts of the General Plan buildout in combination with the four annexation areas.

Response 7.22

The wording of these mitigation measures has been revised. Please refer to Response 3.4 above.

Response 7.23

Please refer to Response 7.17 above.

Response 7.24

The referenced statement in Section 4.5 *Geology*, is based on data obtained from the California Geological Survey (January 2007). The statement pertains to faults within or near to the City's boundaries. Major active faults in the area and capable of producing damaging earth shaking are discussed later in the setting discussion of Section 4.5, *Geology*. No change to the EIR is necessary. It should be noted that the City's Safety Element will be updated as part of the Phase 2 General Plan Update, which will include additional discussion of geologic and seismic hazards and potential seismic safety issues and further evaluate existing policies and programs.

Response 7.25

Please refer to Response 7.17 above.



Response 7.26

The Fire Hazards Severity Zones map (Figure 4.6-1) depicts CalFire's designations for wildland fire hazards. The "Urban-Unzoned" category from CalFire denotes the developed/urbanized areas of the valley that are not considered "wildlands" and therefore not zoned for, or subject to, wildland fire hazards.

Response 7.27

As stated on page 4.6-2, the Santa Barbara County Fire Department Hazardous Materials Unit has been designated as the administering agency for Certified Unified Program Agency (CUPA) within the County of Santa Barbara. As the CUPA, the County Fire Department would be responsible for the oversight of sites or accidents involving hazardous materials. Mitigation Measure HAZ-1 has been revised to clarify the role of the County Fire Department. Please refer to the response to Comment 6.10, above. As stated in Mitigation Measure HAZ-1, the City Hazardous Waste/Materials Coordinator would also need to be notified.

Response 7.28

The comment refers to a typographical error in the EIR. In response to this comment, references to "La Purisima Road" have been changed to "Purisima Road", in Sections 4.1, *Aesthetics*, 4.6, *Hazards and Hazardous Materials*, and 4.14, *Utilities and Service Systems*.

Response 7.29

The analysis of potential flood hazards is based on GIS data provided by the Federal Emergency Management Agency (FEMA). As illustrated on Figure 4.7-1, although the adjacent San Miguelito Channel is mapped within the 100-year Floodplain, no portion of the Bailey Avenue Specific Plan Area has this classification.

Response 7.30

An agricultural buffer zone is implemented to protect both residential and agricultural land uses. Agricultural uses are less likely to be impacted by trespassers, or restricted by noise, dust, and other complaints related to agricultural activities when a buffer is in place. In addition, residential uses are protected from noise, odors, etc. generated by nearby agricultural uses. The County Agricultural Commissioner's Office evaluates the effectiveness of proposed agricultural buffers on a case by case basis, and the City would consult with the Agricultural Commissioner's Office to establish the appropriate buffer width. The County maintains recommended standards for setbacks (buffers) of 200 to 500 feet between development and agricultural property based on the types of pesticides used at the agricultural property.



While these County buffer distances can be used as a general rule of thumb, the City of Lompoc does not recommend specific standards for buffers between development and agricultural property. In fact, there is currently no buffer between the existing agricultural uses in the Specific Plan Area and the adjacent residential development. The proposed draft Specific Plan includes a 200-foot wide open space buffer along the entire western site boundary that would be developed with bioswales. Therefore, development of the proposed Specific Plan would improve the existing condition by reducing potential agriculture-urban conflicts. The effectiveness of the proposed Bailey Avenue Specific Plan's agricultural buffer will be further analyzed in the EIR being prepared separately for this Specific Plan.

Response 7.31

Please refer to Responses 6.6 and 6.7 above. The omission of a specific impact level classification was intentional, since this policy consistency issue does not relate to an environmental impact beyond those addressed in other portions of the EIR.

Response 7.32

Please refer to Response 7.6 above.

Response 7.33

Please refer to Response 7.17 above.

Response 7.34

Please refer to Responses 7.5, 7.17, and 7.43.

Response 7.35

The analysis of the Bailey Avenue Expansion Area is based on conceptual information contained in a Specific Plan that is currently being prepared for that area. The General Plan EIR looks at general buildout of the City and the proposed expansion areas, based on the level of detail available at that time. As stated throughout the EIR, the Bailey Avenue Specific Plan is currently undergoing separate environmental review, which will address its buildout potential and associated impacts in a separate EIR.

Response 7.36

Please refer to Response 7.17 above.



Response 7.37

For clarification purposes, the following revision has been made to Section 4.11, *Public Services*, following Table 4.11-1 on page 4.11-8:

d. **Community Library.** Public library service in the City of Lompoc is provided by the Lompoc Public Library, located at 501 E. North Avenue. The Lompoc Public Library System includes the ~~downtown library~~ Lompoc Public Library on E. North Avenue, and branches in Vandenberg Village and Buellton. Both branches are located outside the city limits of Lompoc and do not receive City of Lompoc funding. The Lompoc Library houses 90,376 print and audiovisual materials in 19,710 square feet of space, with seating for 140. The National Library standard of 0.6 square feet of library space per capita is the accepted guideline for evaluation of facility size (Molly Gerald, Library Director, personal communication, 2008). Using this standard, the Lompoc Library facility is inadequate for the current population of 42,957; an additional 6,064 square feet is needed. It should be noted that the Charlotte's Web Children's Library is planned to be located at 211 S. I Street. This project is currently in the design development phase, and therefore is not factored into the above calculations for existing facilities.

Response 7.38

As stated in the analysis of Impact PS-1, future development in the Miguelito Canyon expansion area "would be required to pay impact mitigations fees as set forth by the City of Lompoc. Payment of impact mitigation fees would result in funding equivalent to the provision of additional fire fighters and/or equipment (*emphasis added*) for the Fire Department." Should the Fire Department decide that new equipment would be necessary to address fires in this area, payment of fees would provide adequate mitigation.

Response 7.39

Please refer to Response 7.17 above.

Response 7.40

The EIR mitigation measures for potential impacts to various public services refer to standard fees that are currently imposed by the City Planning Department during the development review process. These fees are collected prior to issuance of building permits for development in the City (including future annexation areas). These fees are regularly updated to keep them current.



Response 7.41

For clarification purposes, the following paragraph on page 4.12-1 of Section 4.12, *Recreation*, has been revised as follows:

Additional parkland in and around Lompoc, but not operated by the City, are also available to Lompoc residents. These include: Jalama Beach County Park (24 miles south of Lompoc), Ocean Beach County Park (13 miles west of Lompoc), Miguelito County Park (located in three miles south of Lompoc), and La Purisima Mission State Historic Park (located northeast of Lompoc), as well as the Endeavour Center (located on Vandenberg Air Force Base), and private facilities such as La Purisima Golf Course (located east of Lompoc) and multiple homeowner association-operated play areas, sports fields, and pools throughout the City.

Response 7.42

Page 4.12-1 has been revised as follows:

a. **Existing Parks and Recreation Facilities.** The City of Lompoc owns and operates ~~22~~ 21 public parks and recreation facilities (parkland) which total ~~450~~ 447 acres, as shown in Figure 4.12-1. Although the City owns and operates these parks, approximately 227 acres of this parkland is located outside of but immediately adjacent to the existing City Limits. The parkland outside City Limits includes River Park, Riverbend Park and an unnamed open space area located between River Park and Riverbend Park. Parkland within the City Limits totals ~~222.5~~ 220 acres. This total includes 2.5 acres at Lompoc Valley Middle School, and 0.32 acres at the Civic Auditorium which ~~is~~ are available under a Joint-Use Agreement between the City and the Lompoc Unified School District (LUSD).

Of the ~~450~~ 447 total acres, 28 acres are designated as neighborhood parks, ~~195~~ 192 acres are designated as community parks, and 227 acres are designated as regional parks...

Figure 4.12-1 has also been revised to reflect these changes.

In addition, Table 4.12-1 has been updated, as follows:



**Table 4.12-1
Lompoc Park & Recreational Facilities**

Park Name	Acreage	Type	Amenities
<i>Existing Parks and Recreation Areas within City Limits</i>			
Anderson Recreation Center	0.3	Community	Multi-purpose room (gymnasium), several classrooms, and a kitchen
Barton Park	5.11	Neighborhood	Playground, benches, basketball court, walking path, and open turf play areas, access to the East-West Channel Bike Path and dog park
Beattie Park	42.90	Community	Playground, picnic area, basketball courts, horseshoe pits, fitness trail, athletic field, BBQs, urban forest preserve
Briar Creek Park	4	Community	Tot lot, restrooms, baseball field, open play area
Centennial Square	0.32	Community	Benches, gazebo, art gallery
College Park and Lompoc Aquatic Center	4.56	Neighborhood	Skate park, YMCA location. Aquatic center includes competition pool, recreation pool with water features and water slides, therapeutic pool, and classroom
Lompoc Valley Community Center	2.1	Community	Senior activities, educational programs and classes, private rentals, company events. Facility offers dining room, meeting and classrooms, and a kitchen
Civic Auditorium	0.3	Community	430 seat auditorium and classroom
City Hall	2.50	Community	Benches, public art
Johns-Marville J.M. Park	5.2 5.16	Neighborhood	Playground, BBQs, 2 lighted baseball fields, basketball court
Ken Adams Park	118.8 118.79	Community	Playground, BBQs, nature trails, horseshoe and volleyball facilities
Lompoc Library	1.8 1.79	Community	Library amenities, benches, public art
Museum	0.32	Community	Benches, public art
Old Mission Site	1.1 1.07	Community	Educational amenities
Pioneer Park	4.71	Neighborhood	Baseball field, playground, benches, pre-school facility, open turf areas
Ryon Memorial Park	19.62	Community	Baseball and softball fields, tennis courts, athletic field, tot lot, BBQs, stage
Thompson Park	4.34	Neighborhood	Playground, BBQs, softball field, benches, open turf
Westvale Park	2 1.96	Neighborhood	Playground, tot lot, benches, open turf areas
Subtotal	217.5 217.15		
<i>Parks and Recreation Available Through Joint-Use Agreements with Lompoc Unified School District</i>			
Lompoc Valley Middle School	2.50	Neighborhood	Playground, softball field, benches
Civic Auditorium	0.32	Community	430 seat auditorium and classroom
Subtotal	2.82		
<i>Existing Parks and Recreational Areas Owned and Operated by the City Outside City Limits</i>			
River Bend Park	41.32	Regional	Baseball field, BBQs, batting cages, multi-use athletic fields
River Park	113.81	Regional	Playground, fitness trail, Kiwanis Lake, horseshoe pits, volleyball courts, campground, large group BBQs
Unnamed Open Space (adjacent to River Park)	71.9 71.86	Regional	Open space, passive recreation trails
Subtotal	227 226.99		



**Table 4.12-1
Lompoc Park & Recreational Facilities**

Park Name	Acreage	Type	Amenities
Total Existing Acreage	447.3 446.96		
Planned Park Facilities			
River Bend Park (phase III)	4.3	Regional	Baseball fields, restrooms, concessions
River Park Campground	8	Regional	Campground, restrooms, showers
Unnamed Park	0.5	Community	Formal park, fountain, art, restrooms
Total Proposed Acreage	12.8		
Total Existing and Proposed Acreage	460.1 459.76		

The following paragraph on page 4.12-7 has also been revised:

The City of Lompoc currently has a population of 42,892 (Department of Finance, 2009). Based on the standards outlined in Policy 1.1 above, the City of Lompoc should have 85.8 acres of neighborhood parkland, 214.5 acres of community parkland and 214.5 acres of regional parkland, for a total of 515.5 acres. As shown in Table 4.12-1, the City currently has 28 acres of neighborhood parkland, ~~195~~ 192 acres of community parkland, and 227 acres of regional parkland. The City therefore has an existing deficit of 57.8 acres of neighborhood parkland and ~~19.5~~ 22.5 acres of community parkland. The City exceeds the regional parkland requirement by 12.5 acres.

In addition, the cumulative impact discussion on page 4.12-10 has been updated as follows:

Cumulative buildout of the 2030 General Plan includes buildout of areas within existing City boundaries as well as buildout of the four identified expansion areas. Impacts related to recreation from these components of the General Plan have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed General Plan Update. Upon 2030 General Plan buildout, the cumulative population increase would be approximately 16,568, resulting in a total City population of 59,525. This population would generate a need for 119.1 acres of neighborhood parkland (~~33.23~~ 33.23 acres above existing demand), 296.3 acres of community parkland (~~125.1~~ 81.8 acres above existing demand) and 296.3 acres of regional parkland (~~125.1~~ 81.8 acres above existing demand). The 59 acres of community parkland in the Bailey Avenue Specific Plan area would accommodate some of this demand, as would the existing ~~12.2~~ 12.5 acre surplus in regional parkland. However, the additional demand would still exceed current and anticipated supplies. This additional demand for parkland would create the need for new or expanded recreational facilities, the construction of which could cause adverse environmental impacts. However, as discussed above, future development



within the City Limits would be required to pay in-lieu fees. Upon compliance with these existing requirements, impacts would be less than significant.

These revisions provide clarification regarding the amount of existing parkland, and do not affect the analysis or conclusions in the EIR.

Response 7.43

Payment of fees in-lieu of the provision of parkland is considered to be full mitigation by the State of California. The State Quimby Act grants authority to local agencies to require a specific ratio of parkland for its residents for the approval of any tract or parcel map, and the authority to accept payment of fees in lieu of the provision of parkland for the development of such tract or parcel maps. The City of Lompoc has a standard requirement of 12 acres of parkland per 1,000 residents, which is to include two acres of neighborhood parks, five acres of community parks and five acres of regional parks (refer to PRE Policy 1.1.) The City also has an established in-lieu fee program to offset impacts to parkland by payment of fees. The exact fee is determined by calculating the projected cost to provide adequate parkland in light of existing conditions and the cost to maintain those parks. The fee is updated regularly to reflect the need for parkland and to account for any increased maintenance costs. The fees paid through the payment program are used to acquire, build, and maintain parks. Development under the General Plan would be required to pay fair share of fees, but this does not necessarily result in the direct provision of a park. Once enough fees are collected and the need for a park is confirmed, then the City can use those fees to develop additional park facilities.

Response 7.44

Please refer to Response 7.17 above.

Response 7.45

Please refer to Response 7.17 above.

Response 7.46

For clarification purposes, the reference to a future COLT Transit Center has been removed from Section 4.13, *Transportation and Circulation*, of the EIR, as shown below. The transit center is not being proposed by the General Plan, and therefore is not a component of the "project" analyzed in this EIR. Should a location and timeframe for construction of a new transit center be decided upon in the future, that project will be subject to subsequent environmental review.

Transit System. City of Lompoc Transit (COLT) provides public transit service within Lompoc, Mission Hills, and Vandenberg Village. There are five local bus



routes serving these areas. Service is available from 6:30 am to 8:00 pm on weekdays, and 9:00 am to 5:00 pm on Saturday. Curb-to-curb service is also available for persons with disabilities. ~~COLT is currently designing a Transit Center.~~

Response 7.47

As stated in the EIR, on page 4.13–19, the impact at the Ocean Avenue/A Street intersection cannot feasibly be mitigated, so impacts at that intersection are Class I, significant and unavoidable. However, mitigation options are available to address all projected deficiencies for other impacted intersections within the City.

Response 7.48

For clarification purposes, the referenced discussion on Page 4.13–41 of the DEIR has been revised as follows:

Significance After Mitigation. As shown in Table 4.13–5, implementation of mitigation measures TC–1(a) through TC–1(k) would reduce impacts to a less than significant level for all intersections except the ~~H Street/Central Avenue and A Street/Ocean Avenue~~ intersections. Although Mitigation Measure TC–1(j) could reduce impacts to a less than significant level for the A Street/Ocean Avenue intersection, it is not considered feasible mitigation measures due to the high costs associated with the improvements. As such, build-out of the draft 2030 General Plan would have an unavoidably significant impact to the ~~H Street/Central Avenue and A Street/Ocean Avenue~~ intersections. However, it should be noted that the intersections of H Street/Central Avenue and A Street/Ocean Avenue is are in the SBCAG CMP and meets the CMP intersection minimum level of service criteria of LOS D.

Response 7.49

The commenter raises an issue of a conflict between Mitigation Measure TC–1(a–c) and CE Goal 2. It should be noted that the installation of traffic signals, as recommended in the above measure, would generally improve roadway safety conditions (refer also to Response 7.6 above.) However, since no specific concerns or additional evidence are provided to support the commenter’s opinion, no further response is possible.

Response 7.50

Please refer to Response 7.17 above.



Response 7.51

Trip generation from Area B was factored into the traffic analysis as part of General Plan buildout traffic modeling. The EIR traffic section focuses on intersection operations rather than roadway segment operations because the City's level of service standards relate to intersections rather than segments. Conditions on Robinson Bridge are represented by traffic conditions at the Highway 1/SR 246 intersection. The EIR traffic section shows this intersection degrading to LOS D during the PM peak hour under cumulative + proposed General Plan conditions. As discussed in Section 4.13, *Traffic and Circulation*, Mitigation Measure TC-1(k), which requires improvements to this intersection, would mitigate the impact to a less than significant level.

Response 7.52

The Mission Hills Community Services District (CSD) serves the community of Mission Hills, which is not a part of the Lompoc General Plan area, and therefore not discussed in the EIR. However, page 21 of the Lompoc Water Resources Study 2008 contained in Appendix I of the EIR states that: "According to the terms of the intertie agreement between the City of Lompoc and Mission Hills CSD, the City would not supply water to development in Area D (the Wye). It is assumed here that Mission Hills CSD would supply water to new development in that area, and that the net effect on the basin-wide groundwater budget would remain the same."

Response 7.53

Please refer to Response 7.17 above.

Response 7.54

Notification of future Planning Commission and City Council meetings where the General Plan and/or EIR will be provided, as requested.

