



# Arctic Cold Agricultural Processor and Freezer Project

Final Environmental Impact Report  
SCH Number: 2020100453

*prepared by*

**County of Santa Barbara**  
Planning and Development  
624 West Foster Road, Suite C  
Santa Maria, California 93455  
Contact: Holly R. Owen, Supervising Planner

*prepared with the assistance of*

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

**February 2022**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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# Executive Summary

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This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Arctic Cold Agricultural Processor and Freezer Project (proposed project). This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

## Project Synopsis

### Project Applicant

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(805) 348-3600

### Lead Agency Contact Person

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### Project Description

This EIR has been prepared to examine the potential environmental effects of the Arctic Cold Project. The following is a summary of the full project description, which can be found in Section 2.0, *Project Description*.

The subject property is located at 1750 East Betteravia Road approximately one mile east of the City of Santa Maria in northern Santa Barbara County. The property is located on the east side of Rosemary Road, approximately 1.1 miles east of U.S. Highway 101 (U.S. 101) and is comprised of two parcels (Assessor Parcel Numbers [APN] 128-097-001 and 128-097-002), totaling approximately 109 acres. The property is bound by Rosemary Road on the west, East Betteravia Road on the north, and Prell Road on the south. Active agricultural operations surround the property in all directions. The proposed processor and freezer facilities would be located on approximately 40 acres on the northeast portion of the subject property (“project site”).

The proposed project involves a Conditional Use Permit and Development Plan to allow development of a 449,248 square-foot (sf) gross floor area agricultural processor and freezer facility on a 40-acre project site located in the northeastern portion of the subject property. Other components of the project include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking. Table ES-1 provides the proposed project characteristics, including the building area for each of the primary components of the proposed processor and freezer facilities.

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The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California, Mexico for processing. Most of the produce would be sourced from the area within 25 miles of the County boundary. A smaller portion (approximately 10%) of produce coming into the processor facility would be sourced from outside the area within 25 miles of the County boundary. This import would be timed with off-season needs to supplement local produce. Once the produce has been staged and checked for quality, produce would be washed, sorted (defects will be temporarily stored for composting), and conveyed to processing equipment throughout the facility. Processing includes slicing, dicing, and freezing, adding sugar and other ingredients, and making purees and puree concentrates pursuant to client requirements. The project would not be permitted to do any milling, juicing or pasteurization, pursuant to consistency with applicable County agricultural standards (LUDC 35.42.040.B.1.b). Once processed, the finished product would be packaged and conveyed to the attached cold storage for blast freezing and storage until ready to ship out to customers.

The freezer facility would specialize as a cold distribution warehouse. Product would be received and entered into a computerized warehouse management system (WMS), which would determine whether the product would be placed in cold room storage or blast freezers. Product would be stored in cold rooms until it is shipped out to regions throughout the United States.

Support facilities would include offices and dry storage/warehousing. Most of the processor equipment would be electric-driven; except for four 100 horsepower (hp) low NO<sub>x</sub> boilers, one 300 hp low NO<sub>x</sub> boiler, and four propane forklifts.

**Table ES-1 Project Characteristics**

Address	1750 East Betteravia Road	
APNs	128-097-001 (99.0 acres) and 128-097-002 (9.8 acres)	
Height/Stories		
Processor	41.1 feet from existing grade <sup>1</sup> /45.2 feet from finish grade <sup>2</sup>	
Freezer	53.3 feet from existing grade <sup>1</sup> /57.4 feet from finish grade <sup>2</sup>	
Lot Area	108.8 acres (subject property) 40.0 <sub>1</sub> acres (project site)	
<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors) for Processor</b>		
Processing	76,371 sf	
Cooler	10,500 sf	
Dry Storage/Warehousing	19,708 sf	
Administrative	15,410 sf	
Maintenance	5,557 sf	
Canopy	10,859 sf	(not Included in total)
Processor Subtotal	127,546 sf	
<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors) for Freezer</b>		
Freezer	263,716 sf	
Dock	32,784 sf	
Blast Freezer	10,276 sf	
Administrative	7,222 sf	
Mechanical	7,704 sf	
Freezer Subtotal	321,702 sf	
<b>Total Processor and Freezer Operational Gross Floor Area</b>	<b>449,248 sf</b>	
sf = square feet		
<sup>1</sup> 300 ft above mean sea level (msl)		
<sup>2</sup> Approximately 4 ft 2 in below existing grade, or 295 ft 10 in above msl. Totals may not sum exactly due to rounding.		

## Project Objectives

The primary objectives for the project are as follows:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

## Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 2 was determined to be the environmentally superior alternative.

- **Alternative 1 (No Project Alternative):** The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes the project is not approved and none of the proposed components, including approval of the Development Plan, Conditional Use Permit, Voluntary Merger, Well Re-Abandonment Plans, and Well Construction Permit, are implemented. This alternative assumes the project site is not developed with the agricultural processor and freezer facility. Under this alternative, the project site would continue to be used for production of row crops, including strawberries and broccoli.
- **Alternative 2 (25 Percent Reduced Alternative):** Alternative 2 would include the same components as the proposed project and would be constructed on the same project site, on the northeastern portion of the subject property. However, the square footage of the agricultural processor and freezer facility would be reduced by 25 percent compared to the proposed project. Specifically, Alternative 2 would include a Conditional Use Permit and Development Plan to allow development of a 336,936 square-foot agricultural processor and freezer facility on the 40-acre project site located in the northeastern portion of the subject property. Other components of Alternative 2 would include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.
- **Alternative 3 (Alternative Location on Subject Property):** Alternative 3 would include the same components and densities as the proposed project but would be constructed on the southeastern portion of the subject property, approximately 1,500 feet southwest of the proposed project location, with site access via Prell Road. Specifically, Alternative 3 would include a Conditional Use Permit and Development Plan to allow development of a 449,248 square-foot gross floor area agricultural processor and freezer facility on a 40-acre project site located in the southeastern portion of the subject property. Other components of Alternative 3 would include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

Refer to Section 6.0, *Alternatives*, for the complete alternatives analysis.

## Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Section 1.0, *Introduction*.

## Required Approvals

Implementation of the project would require the following discretionary approvals from the County of Santa Barbara:

- **Development Plan** due to scale of project (no by right construction for this use): LUDC 35.82.030.C.2.b.1 requires a development plan for Agricultural Structural Development if the proposed project is greater than 15,000 sf;
- **Conditional Use Permit** due to proposed use: off-premise product-producing facilities (Table 2-1: LUDC 35.21.030);
- Petroleum Division and CalGEM on proposed **re-abandonment plans** (under the most current abandonment standards) for the three former petroleum wells (Vincent 9, 21, and 22) within the project footprint;
- LUDC Section 34A-4(b) requires that an application for a water **well construction permit** shall include a plot plan indicating the location of the well with respect to the existing water well on the property; and
- Although a **Solid Waste Management Plan (SWMP)** would not be required until building permits are sought, the Standards for Agricultural Processing Facilities in LUDC Section 35.42.040.B.1.b(3) specify that all process water and waste material from milling shall be managed onsite as recycled irrigation water or organic compost.

In addition to the above required approvals, the Central Coast Regional Water Quality Control Board (RWQCB) will be a responsible agency for coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, ~~issuance of a Domestic Water Supply Permit for a non-community, non-transient water system~~, and issuance of a waste discharge requirements permit for wastewater systems. The County Flood Control and Water Conservation District will be a responsible agency for review of the proposed detention basin system. The California Department of Fish and Wildlife (CDFW) will be a responsible agency for administering the California Endangered Species Act and would authorize “take” of state listed species by reviewing application for and issuance of an Incidental Take Permit subject to Sections 2081(b) and 2081(c) of the California Fish and Game Code. The United States Fish and Wildlife Service (USFWS) will be a responsible agency for implementing the Federal Endangered Species Act and would authorize incidental “take” of federally listed species through Section 7 or Section 10 of the federal Endangered Species Act. The Santa Barbara County Air Pollution Control District (SBCAPCD) will be a responsible agency for the proposed boilers and any other regulated stationary sources of pollutant emissions. SBCAPCD inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal and state Clean Air Acts. For drilling the well as a public water system for the project, approval for the project will be required from the State Water Resources Control Board. Additionally, Environmental Health Services will require a water system technical report, the approval from the State Water Resources Control Board, and testing of the new well before issuing a Zoning Clearance.

## Summary of Impacts and Mitigation Measures

Table ES-2 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Potential project-specific and cumulative impacts are listed below in summary form. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.

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- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Based on comments received during the public hearing and NOP comment period, the County of Santa Barbara determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the resource areas of forest resources, historic resources, mineral resources, and population and housing. The substantiation for determining that these issues would result in no impact or a less-than-significant impact is described in Section 4.15, *Effects Found Not to be Significant*, and in further detail in the NOP and Scoping Paper in Appendix A.

**Class I – Significant and Unavoidable Impacts**

- Operational air quality emissions
- Cumulative air quality impacts
- Long-term/cumulative increase in GHG emissions
- Solid waste
- Cumulative solid waste impacts

**Class II – Significant Impacts that Can Be Mitigated to Less than Significant Levels**

- Special status animal species
- State- or federally-protected wetlands
- Cumulative biological resources impacts
- Archaeological resources
- Tribal cultural resources
- Cumulative cultural resources impacts
- Paleontological resources
- Cumulative impacts to paleontological resources
- Use and transport of hazardous materials
- Hazardous material contamination

**Class III – Less than Significant Impacts**

- Scenic vistas
- Scenic resources
- Visual quality and character
- Light and Glare
- Cumulative impacts to visual resources

- Agricultural resources
- Cumulative impacts to agricultural resources
- Clean Air Plan consistency
- Construction air quality emissions
- Odor emissions
- Human remains
- Energy impacts
- Cumulative energy impacts
- Groundshaking
- Erosion
- Septic tanks
- Cumulative impacts to geologic hazards
- Consistency with GHG reduction plans and regulations
- Cumulative hazards and hazardous materials impacts
- Water quality during construction
- Water quality during operation
- Groundwater extraction
- Drainage patterns and stormwater runoff
- Cumulative impacts to hydrological resources and water quality
- Plan consistency
- Quality of life compatibility
- Cumulative land use impacts
- Construction noise impacts
- Operational noise impacts
- Groundborne vibration
- Cumulative noise impacts
- Circulation Plan consistency
- Vehicle miles traveled impacts
- Emergency access
- Cumulative transportation impacts
- Water supply, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities
- Cumulative water supply, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities impacts



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**Table ES-2 Summary of Potentially Significant Environmental Impacts, Mitigation Measures and Significance After Mitigation**

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Class I Project-Specific Impacts (Significant and Unavoidable)</b>		
<b>Air Quality</b>		
<p>AQ-3. Project operational emissions would exceed the County’s significance thresholds for NO<sub>x</sub> emissions. Implementation of required mitigation would reduce NO<sub>x</sub> emissions to the extent feasible. However, project-related NO<sub>x</sub> emissions would remain above applicable NO<sub>x</sub> emission thresholds. This impact would be significant and unavoidable.</p>	<p><b>AQ-1. NO<sub>x</sub> and ROC Emissions Reduction Measures</b>                      The applicant shall implement the following NO<sub>x</sub> and ROC emission reduction measures:</p> <ol style="list-style-type: none"> <li>Provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.</li> <li>All loading/unloading docks and trailer spaces shall be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement decreases the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration shall be encouraged for operational fleets to the maximum extent feasible.</li> <li>All TRUs entering the project site shall be plug-in capable.</li> <li>All heavy-duty trucks entering or on the project site shall be model year 2014 or later to the maximum extent feasible. Operational fleets shall use zero-emission light and medium-duty delivery trucks and vans to the maximum extent feasible. The applicant shall expedite a transition to zero-emission vehicles, with all operational fleets being fully zero-emission beginning in 2030.</li> <li>On-site TRU diesel engine runtime shall be limited to no longer than 15 minutes.</li> <li>Include rooftop solar panels to the maximum extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.</li> </ol> <p><b>Plan Requirements and Timing.</b> The Conditional Use Permit shall require that the applicant report operational characteristics to Planning and Development staff annually, with the initial report due three months after initial project operation. Annual reports shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures C through H are being implemented on an on-going basis.</p> <p>If the project applicant applies for a stationary source air permit from the SBCAPCD, the applicant shall demonstrate to the satisfaction of Planning and Development staff that measures E through H are incorporated into the air quality permit requirements. <del>Upon issuance of the air quality permit, implementation monitoring of these measures may be transferred to SBCAPCD staff to streamline enforcement.</del></p> <p><b>Monitoring.</b> Planning and Development compliance monitoring staff shall incorporate these NO<sub>x</sub> and ROC emission reduction measures into the project Conditional Use Permit. Prior to issuance of the Conditional Use Permit, the applicant shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures (a, b, and i) have been constructed.</p>	<p>Implementation of Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> emissions to the extent feasible by providing infrastructure necessary to support zero-emission vehicles and equipment. However, the project applicant would have limited control of the composition of truck fleets, the project could not feasibly reduce mobile source emissions by the amount required to reduce the project’s NO<sub>x</sub> and ROC emissions below the applicable mobile source NO<sub>x</sub> and ROC threshold. <u>In addition, the County does not have an established off-site mitigation program for ozone precursors, and therefore a feasible and enforceable mitigation measure for offset mitigation would not be possible.</u> As a result, the potential impact of the project’s operational emissions of NO<sub>x</sub> would remain significant and unavoidable.</p>
<b>Greenhouse Gas Emissions</b>		
<p>GHG-1. Project GHG emissions would exceed the County’s applicable interim greenhouse gas emissions significance threshold. Project GHG emissions would be reduced through compliance with applicable local programs, use of efficient technology, and implementation of appropriate reduction measures to the extent feasible. However, project GHG emissions would remain above the County’s thresholds. Therefore, this impact would be significant and unavoidable.</p>	<p><b>GHG-1. Greenhouse Gas Reduction Program</b>                      The project applicant shall prepare and implement a Greenhouse Gas Reduction Program (GHGRP) that includes on-site GHG reduction measures to reduce the project’s total remaining GHG emissions to 3.8 MT of CO<sub>2</sub>e per service person per year or less. Potential options include, but would not be limited to:</p> <ul style="list-style-type: none"> <li>Supply 100 percent of electricity from renewable energy resources. Options include opting into PG&amp;E’s Solar Choice (opting to supply 100 percent of annual energy usage) Program or PG&amp;E’s Regional Renewable Choice (opting to supply 100 percent of annual energy usage) Program.</li> <li>Implement a transportation demand program. Program measures may include free transit passes for employees, electric rideshare vehicles for employees, and construction of additional transit infrastructure at the project site.</li> <li>Implement a zero waste program or other feasible waste-reduction measures such as composting waste food scraps from employee activities and food waste processing.</li> </ul> <p>After implementation of feasible on-site GHG reduction measures, the project applicant may also implement one of, or a combination of, the following off-site measures to achieve up to 50 percent of the total necessary GHG emission:</p> <ul style="list-style-type: none"> <li>Directly undertake or fund activities that reduce or sequester GHG emissions (“Direct Reduction Activities”) and retire the associated “GHG Mitigation Reduction Credits.” A “GHG Mitigation Reduction Credit” must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB’s most recent <i>Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation</i> (CARB 2013). An “Approved Registry” is an accredited carbon registry that follows approved CARB Compliance Offset Protocols. As of April 2021, Approved Registries include American Carbon Registry, Climate Action Reserve, and Verra (CARB 2018b). Credits from other sources shall not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CARB standards. <u>If the project applicant chooses to meet some of the GHG reduction requirements through Direct Reduction Activities, the activities shall be implemented as feasible in order of County preference: (1) within the County of Santa Barbara; (2) within the SBCAPCD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States.</u> In the event that a project or program providing GHG Mitigation Reduction Credits to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring GHG Mitigation Reduction Credits specific to the registry involved and shall undertake additional direct investments to recoup the loss.</li> <li>Obtain and retire “Carbon Offsets.” “Carbon Offset” shall mean an instrument issued by an Approved Registry and shall represent the past reduction or sequestration of 1 MT of CO<sub>2</sub>e achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4[c][3]). A “Carbon Offset” must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB’s most recent <i>Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation</i> (CARB 2013). If the project applicant chooses to meet some of the GHG reduction requirements by purchasing offsets on an annual and permanent basis, the offsets</li> </ul>	<p>Mitigation Measure GHG-1 provides the project applicant a menu of options for specific GHG reductions, including on-site reductions through the use of renewable electricity, and off-site reductions through purchasing off-site reduction credits or carbon offsets. As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable by the project, as well as the magnitude of the project’s exceedance of the County’s adopted GHG emissions threshold, and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), it is not possible to demonstrate that Mitigation Measure GHG-1 could feasibly reduce the project’s emissions below the County’s significance threshold. Therefore, the project’s impact from GHG emissions would remain significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p>shall be purchased according to the County of Santa Barbara’s preference, which is, in order of County preference: (1) within the County of Santa Barbara; (2) within the SBCAPCD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States. In the event that a project or program providing offsets to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.</p> <ul style="list-style-type: none"> <li>No more than 50 percent of the project’s total requisite emission reduction over the project’s lifetime may be achieved through direct reduction activities and carbon offsets.</li> </ul> <p><b>Plan Requirements and Timing.</b> The applicant shall submit to Planning &amp; Development the GHGRP for review and approval prior to final design approval. The GHGRP shall either reduce the project’s emissions to 3.8 MT CO<sub>2</sub>e per service person per year or shall incorporate all feasible actions to reduce emissions associated with electricity demand, transportation, and waste generation and shall purchase 50 percent carbon offsets. Planning &amp; Development shall verify that project plans incorporate required GHG emission reduction measures per the GGRP prior to final design approval. Each emission reduction measure shall include a commitment enforceable by Planning &amp; Development.</p> <p><b>Monitoring.</b> Planning &amp; Development compliance monitoring staff shall confirm inclusion of the required GHG emission reduction measures into the project Conditional Use Permit. Compliance with all components of the GHGRP shall be verified during construction and prior to issuance of a Certificate of Occupancy.</p>	
<b>Utilities and Service Systems</b>		
<p>U-2. The project would generate solid waste during construction and operation that would increase demand on the Santa Maria Landfill. This impact would be significant and unavoidable.</p>	<p><b>U-1. Source Reduction and Solid Waste Management Plan (SRWMP) during Operation</b></p> <p>The Applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) for project operation and submit to the County for approval prior to issuance of building permits. The SRWMP shall describe commitments to reduce the amount of waste generated during project operation. The SRWMP shall include, at a minimum:</p> <ol style="list-style-type: none"> <li>Provision of space and/or bins for storage of recyclable materials within common areas of the project site.</li> <li>Management strategies for organic waste, including potential locations for off-site composting.</li> <li>Implementation of a green waste source reduction program for composting in open areas, and the use of mulching mowers in all common open space lawns.</li> </ol> <p><b>Plan Requirements and Timing.</b> The Applicant shall submit a Source Reduction and Solid Waste Management Plan to Planning &amp; Development for project operation for review and approval prior to issuance of building permits. The Applicant shall implement all aspects of the Plan during operation of the project in accordance with the above-described conditions.</p> <p><b>Monitoring.</b> Prior to occupancy, the Applicant shall demonstrate to Planning &amp; Development compliance monitoring staff that all required operational solid waste reduction measures will be implemented.</p> <p><b>U-2. Source Reduction and Solid Waste Management Plan (SRWMP) during Construction</b></p> <p>The Applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) for construction and submit to the County for approval prior to issuance of grading permits. The SRWMP shall describe commitments to reduce the amount of waste generated during construction of the project and estimate the reduction in solid waste generated during each phase of project construction. The SRWMP shall include, at a minimum:</p> <ol style="list-style-type: none"> <li>Construction Source Reduction <ol style="list-style-type: none"> <li>A description of how fill will be used on the construction site, instead of landfilling.</li> <li>A program to purchase materials that have recycled content for project construction.</li> </ol> </li> <li>Construction Solid Waste Reduction <ol style="list-style-type: none"> <li>Prior to construction, the contractor will arrange for construction recycling service with a waste collection provider. Roll-off bins for the collection of recoverable construction materials will be located onsite. The Applicant, or authorized agent thereof, shall arrange for pick-up of recycled materials with a waste collection provider or shall transport recycled materials to the appropriate service center. Wood, concrete, drywall, metal, cardboard, asphalt, soil, and land clearing debris may all be recycled.</li> <li>The contractor will designate a person to monitor recycling efforts and collect receipts for roll-off bins and/or construction waste recycling. All subcontractors will be informed of the recycling plan, including which materials are to be source-separated and placed in proper bins.</li> <li>Recycling and composting programs including separating excess construction materials on-site for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provided separate on-site bins as needed for recycling.</li> </ol> </li> </ol> <p><b>Plan Requirements and Timing.</b> The Applicant shall submit a Source Reduction and Solid Waste Management Plan for construction to Planning &amp; Development for review and approval prior issuance of a grading permit. The Applicant shall implement all aspects of the Plan during construction of the project in accordance with the above-described conditions.</p> <p><b>Monitoring.</b> The Applicant shall demonstrate to Planning &amp; Development compliance monitoring staff that all required source reduction and solid waste reduction measures are implemented during project construction.</p>	<p>Mitigation Measure U-1 and Mitigation Measure U-2 would reduce solid waste generation during the construction and operational phases of the project. However, waste generated by the project would still exceed the County’s operational solid waste threshold and the construction solid waste threshold. Therefore, the project would continue to exceed the County’s solid waste thresholds for operation and construction. As a result, operational and construction impacts related to solid waste would be significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Class I Cumulative Impacts (Significant and Unavoidable)</b>		
<b>Air Quality</b>		
<p>Cumulative development in Santa Maria and the surrounding area would increase criteria pollutant emissions in the SCCAB, which would contribute to the nonattainment status for the State PM<sub>10</sub> standards in the Santa Barbara County portion of the SCCAB. Because Santa Barbara County is currently in nonattainment for the State standard for PM<sub>10</sub>, cumulative air quality impacts are potentially significant. Based on Santa Barbara County thresholds, a project would have a significant cumulative impact if it is inconsistent with the applicable adopted federal and state air quality plans (in this case, the 2019 Ozone Plan). As discussed in Impact AQ-3, project operational emissions would result in a cumulatively considerable increase of criteria pollutants due to high NO<sub>x</sub> emissions. Therefore, the project would contribute to cumulative impacts to air quality.</p>	<p>Mitigation Measure AQ-1 would reduce the project's contribution to significant cumulative impacts to air quality.</p>	<p>Implementation of Mitigation Measure AQ-1 would still result in a significant and unavoidable impact to criteria pollutants pertaining to NO<sub>x</sub> emissions. Thus, the project would result in a cumulatively considerable contribution to air quality impacts.</p>
<b>Greenhouse Gas Emissions</b>		
<p>Climate change is quintessentially a global or cumulative impact. Project GHG emissions would exceed the County's adopted GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population, even after the implementation of Mitigation Measure AQ-1 and Mitigation Measure GHG-1.</p>	<p>Mitigation Measure AQ-1 and Mitigation Measure GHG-1 would reduce the project's contribution to significant cumulative impacts to climate change.</p>	<p>Project GHG emissions would exceed the County's adopted GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population, even after the implementation of Mitigation Measure AQ-1 and Mitigation Measure GHG-1. Therefore, the project's contribution to the cumulative GHG impact would be significant and unavoidable.</p>
<b>Utilities and Service Systems</b>		
<p>The proposed development, in conjunction with other planned and pending development in the Santa Maria area, would increase solid waste generation, thereby reducing the lifespan of the Santa Maria Landfill. Project operation would contribute incrementally to the cumulative impact to landfill capacity. Waste generated during project operation would exceed the County's 40 tons per year cumulative solid waste threshold.</p>	<p>Mitigation Measure U-1 would be required to reduce the project's solid waste generation.</p>	<p>Implementation of Mitigation Measure U-1 would reduce the project's solid waste generation to 360 tons per year during project operation, which would be above the County's 40 tons per year cumulative solid waste threshold. Therefore, the project's contribution to cumulative solid waste impacts would be significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Class II Project Specific Impacts (Significant But Mitigable)</b>		
<b>Biological Resources</b>		
<p><b>BIO-1. The project would result in Construction impacts to special status animal species, if present. This impact would be less than significant with mitigation incorporated.</b></p>	<p><b>BIO-1. California Red-legged Frog Avoidance and Minimization Measures</b></p> <p>The applicant shall ensure that following avoidance and minimization measures are implemented during project construction activities requiring ground disturbance:</p> <ul style="list-style-type: none"> <li>▪ A qualified biologist shall survey the project site no more than 48 hours before the start of construction activities, including but not limited to vegetation removal, grading, excavation, and trenching. If a CRLF is found within the project footprint, no work shall begin, and consultation with the USFWS shall be initiated. Work shall not begin until authorization is provided by the USFWS to continue or applicable measures from a Biological Opinion/Incidental Take Statement (BO/ITS) or Habitat Conservation Plan/Incidental Take Permit (HCP/ITP) are successfully implemented.</li> <li>▪ Before any construction or ground-disturbing maintenance activities begin, a biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of CRLF and its habitat, the specific measures that are being implemented to avoid dispersing CRLF, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.</li> <li>▪ All vehicles and equipment shall be in good working condition and free of leaks. A spill prevention plan shall be established in the event of a leak or spill.</li> <li>▪ Work shall be restricted to daylight hours to the extent feasible. If construction activities occur at night, a biological monitor shall be present. If a CRLF is found within the project footprint during active construction, all work shall stop, and the USFWS shall be notified. Work shall not recommence until authorization is provided by the USFWS to continue or applicable measures from BO/ITS or HCP/ITP are successfully implemented.</li> <li>▪ Water shall not be impounded in a manner that may attract CRLF.</li> <li>▪ All excavations or trenches shall be covered when not actively under construction or shall contain earthen ramps sufficient for CRLF to escape to avoid entrapment of CRLF or other wildlife species.</li> <li>▪ Herbicides shall not be used on site during construction.</li> <li>▪ No pets shall be permitted on site.</li> <li>▪ A biological monitor shall be present during all initial ground-disturbing activities within the irrigation drainage, including but not limited to grading, excavation, and trenching. If a CRLF is found within the project footprint during active construction, all work shall stop, and the USFWS shall be notified. Work shall not recommence until authorization is provided by the USFWS to continue.</li> </ul> <p><b>Plan Requirements and Timing.</b> These measures are to be implemented during grading and construction activities.</p> <p><b>Monitoring.</b> The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The approved biologist shall submit monthly maintenance reports during construction to Planning and Development permit compliance staff.</p> <p><b>BIO-2. Southwestern Pond Turtle Avoidance and Minimization Measures</b></p> <p>The applicant shall ensure that the following avoidance and minimization measures are implemented during project construction activities requiring ground disturbance:</p> <ul style="list-style-type: none"> <li>▪ A qualified biologist shall conduct a visual survey of work areas within 48 hours of initial ground-disturbing activities within suitable habitat, including but not limited to vegetation removal, grading, excavation, and trenching. Prior to the survey, suitable receptor sites shall be identified within suitable aquatic habitat nearby. If a turtle is observed in the work area, the biologist shall relocate it out of the work area to the respective receptor site.</li> <li>▪ In the event that a southwestern pond turtle egg clutch is discovered during pre-construction surveys, the location shall be surrounded with high visibility fencing under the guidance of a qualified biologist. The nest shall be avoided by construction activities until a qualified biologist determines that the clutch has hatched. The CDFW shall also be contacted to provide additional guidance in the event that a southwestern pond turtle nest is discovered. If, during construction, a southwestern pond turtle nest is discovered, construction shall cease immediately upon the discovery, and CDFW shall be notified.</li> </ul> <p><b>Plan Requirements and Timing.</b> These measures are to be implemented during grading and construction activities.</p> <p><b>Monitoring.</b> The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The applicant shall submit a copy of the preconstruction survey report to Planning and Development permit compliance staff.</p> <p><b>BIO-3. Nesting Bird Avoidance and Minimization Measures</b></p> <p>The applicant shall ensure that the following avoidance and minimization measures are implemented during project construction activities:</p> <ul style="list-style-type: none"> <li>▪ Initial site disturbance shall occur outside the general avian nesting season (February 1 through August 31), if feasible.</li> <li>▪ If initial site disturbance occurs in a work area within the general avian nesting season indicated above, a qualified biologist shall conduct a preconstruction nesting bird survey no more than 14 days prior to initial disturbances in the work area. The survey shall include the entire area of disturbance area plus a 50-foot buffer (relevant to non-raptor species, excluding tri-colored blackbird) and 300-foot buffer (relevant to raptors and tri-colored blackbird) around the site. If active nests are located, all construction work should be conducted outside a buffer zone from the nest, which is to be determined by the qualified biologist. Buffers shall be established depending upon the species (except for tri-colored blackbird, see below), status of the nest, and construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist will confirm that breeding/nesting is complete and young have fledged the nest prior to removal of the buffer.</li> <li>▪ If an active tri-colored blackbird nesting colony is found during preconstruction surveys, a minimum 300-foot non-disturbance buffer in accordance with “Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015” (CDFW 2015). This buffer shall remain in place for the duration of the breeding season or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and that they are no longer reliant upon the colony or parental care for survival.</li> <li>▪ If construction activities in a given work area cease for more than 14 days, additional surveys shall be conducted for the work area. If active nests are located, the aforementioned buffer zone measures shall be implemented.</li> </ul>	<p>Mitigation Measures BIO-1 through BIO-3 would require avoidance and minimization measures to reduce direct and indirect impacts to special status species from project construction. As a result, implementation of Mitigation Measures BIO-1 through BIO-3 would reduce project impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS to a less than significant level.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
	<p><b>Plan Requirements and Timing.</b> These measures are to be implemented during grading and construction activities.</p> <p><b>Monitoring.</b> The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The applicant shall submit a copy of the preconstruction survey report to Planning and Development permit compliance staff.</p>	
<p><b>BIO-2. The project would potentially impact a state Jurisdictional Feature through direct removal, filling, or hydrological interruption. This impact would be less than significant with mitigation incorporated.</b></p>	<p><b>BIO-4. Irrigation Drainage Compensatory Mitigation</b></p> <p>Due to the highly disturbed nature of the habitat within the artificial irrigation drainage, project impacts to the irrigation drainage shall be mitigated at a minimum ratio of 1.0:0.5 (acre impacted: acre enhanced/restored/created). Enhancement, restoration, and/or creation of habitat on the project site is preferable. However, the County may approve off-site restoration at a location in the same watershed as where the project impacts occur that results in equal compensatory value. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared which identifies the approach for implementing the compensatory mitigation. The HMMP shall be prepared by a qualified biologist/restoration ecologist and shall describe the compensatory mitigation. As part of the HMMP, a final mitigation implementation plan shall be submitted to and approved by the County prior to issuance of grading permits. The approved HMMP shall be implemented by the applicant, with the County verifying that the success criteria have been met. The HMMP shall include, at a minimum, the following components:</p> <ul style="list-style-type: none"> <li>▪ Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);</li> <li>▪ Goal(s) of the compensatory mitigation project (type[s] and area[s] of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved);</li> <li>▪ Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values of the compensatory mitigation site);</li> <li>▪ Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [e.g., plant species to be used, container sizes, seeding rates, etc.]);</li> <li>▪ Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);</li> <li>▪ Monitoring plan for the compensatory mitigation site;</li> <li>▪ Success criteria based on the goals and measurable objectives;</li> <li>▪ An adaptive management program and remedial measures to address negative impacts to enhancement or restoration efforts;</li> <li>▪ Notification of completion of compensatory mitigation; and</li> <li>▪ Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).</li> </ul> <p>The HMMP shall be implemented for no less than three years after construction, or until the local jurisdiction and/or the permitting authority (e.g., RWQCB) has determined that restoration has been successful.</p> <p><b>Plan Requirements and Timing.</b> The applicant shall submit the HMMP to Planning and Development for review and approval prior to issuance of grading permits.</p> <p><b>Monitoring.</b> Planning and Development shall ensure that impacts to the drainage from the proposed project are properly mitigated.</p> <p><b>BIO-5. Drainage Best Management Practices During Construction</b></p> <p>The project applicant shall ensure that the construction contractor implements the following best management practices during permitted grading and construction within the irrigation drainage and where construction occurs within 100 feet from the drainage.</p> <ul style="list-style-type: none"> <li>▪ Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to the drainage, including locating access routes and ancillary construction areas outside of jurisdictional areas.</li> <li>▪ To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed, including but not limited to straw wattles (free of monofilament), and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project footprint.</li> <li>▪ During construction, no litter or construction debris shall be placed within the drainage. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.</li> <li>▪ All project-generated debris, building materials, and rubbish shall be removed daily from jurisdictional areas and from areas where such materials could be washed into them.</li> <li>▪ Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities, shall be prevented from contaminating the soil and/or entering the drainage.</li> <li>▪ All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.</li> </ul> <p><b>Plan Requirements and Timing.</b> These measures shall be implemented during grading and construction and shall be included on all land use, grading, and building plans.</p> <p><b>Monitoring.</b> The applicant shall retain a County-approved biologist to monitor compliance with the above measures. Planning and Development compliance monitoring and building and safety staff shall periodically inspect for compliance.</p>	<p>Mitigation Measures BIO-4 and BIO-5 specify actions to avoid, minimize, and mitigate for direct and indirect impacts to the jurisdictional drainage from development of the project. As a result, implementation of Mitigation Measures BIO-4 and BIO-5 would reduce project impacts on state protected waters/streambeds through direct removal, filling, hydrological interruption, or other means to a less than significant level.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Cultural and Tribal Cultural Resources</b>		
<p><b>CUL-1. Construction of the project would involve ground disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified historical or archaeological resources. This impact would be less than significant with mitigation.</b></p>	<p><b>CUL-1 Unanticipated Discovery of Historical or Archaeological Resources</b></p> <ul style="list-style-type: none"> <li>▪ Prior to construction, the Construction Contractor shall ensure that a County-qualified archaeologist and a local tribal representative funded by the applicant shall be involved in the design and implementation of a Worker Education Program (WEP) for all project construction supervisors and field personnel who may encounter unknown cultural resources during earthmoving activities. <del>In the event historical or archaeological resources are unexpectedly encountered during ground disturbing construction activities, the Construction Contractor shall halt work within 50 feet of the find. The Applicant shall immediately notify the County of Santa Barbara Planning &amp; Development Staff and retain a County approved archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to evaluate the discovery. If the discovery is prehistoric, then the County approved archaeologist shall contact a local tribal representative to participate in the evaluation of the discovery. If necessary, the evaluation shall include preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources. Work shall not resume until authorization is received from County Planning &amp; Development Staff.</del></li> <li>▪ <u>The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall retain a P&amp;D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant.</u></li> </ul> <p><b>Plan Requirements and Timing.</b> This condition shall be printed on all building and grading plans prior to approval of such plans. A Worker Education Program (WEP) shall be designed and implemented for all project construction supervisors and field personnel who may encounter unknown cultural resources during earthmoving activities. The WEP shall be presented at a pre-construction workshop conducted by a County-qualified archaeologist and a local tribal representative funded by the applicant. Attendees shall include the applicant, archaeologist, tribal representative, construction supervisors, and heavy equipment operators to ensure that all parties understand the cultural resources monitoring program and their respective roles and responsibilities. The names of all personnel who attend the workshop shall be recorded and all personnel attendees shall be issued hardhat stickers denoting that they have received workshop training. This workshop shall be videotaped and shown to any new employees or subcontractors that may be needed during ground-disturbance construction activities. Names of newly trained personnel shall be recorded and those personnel issued appropriate hardhat stickers.</p> <p><b>Monitoring.</b> The Planning &amp; Development permit processing planner shall check plans prior to issuance of grading permits and Planning &amp; Development compliance monitoring staff shall attend the pre-construction workshop, and spot check in the field throughout grading and construction.</p>	<p>Implementation of Mitigation Measure CUL-1 would reduce the potential impact to unanticipated archaeological resources to less than significant.</p>
<p><b>CUL-3. Construction of the project would involve ground disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified tribal cultural resources. This impact would be less than significant with mitigation.</b></p>	<p><b>CUL-2 Unanticipated Discovery of Tribal Cultural Resources</b></p> <p>In the event that a resource of Native American origin is identified during construction, the County of Santa Barbara Planning &amp; Development Staff shall contact all California Native American tribe(s) that have expressed interest and begin or continue consultation procedures with that tribe(s). If the County, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and the proposed project will have a potentially significant impact to the resource, a tribal cultural resource mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measure.</p> <p><b>Plan Requirements and Timing.</b> This condition shall be printed on all building and grading plans.</p> <p><b>Monitoring.</b> A County Planning &amp; Development permit processing planner shall check plans prior to issuance of grading permits, and Planning &amp; Development compliance monitoring staff shall spot check in the field throughout grading and construction.</p>	<p>Implementation of Mitigation Measure CUL-2 would reduce the potential impact to previously unidentified tribal cultural resources on the project site to a less than significant level.</p>
<b>Geology and Soils</b>		
<p><b>GEO-4. The project could directly or indirectly destroy a unique paleontological resource site or unique geologic feature. This impact would be less than significant with mitigation incorporated.</b></p>	<p><b>GEO-1 Worker Environmental Awareness Program for Paleontological Resources</b></p> <p>A qualified paleontologist meeting Secretary of the Interior Standards shall develop a worker awareness program to educate all workers regarding the protection of any paleontological resources that may be discovered during project development, as well as appropriate procedures to enact should paleontological resources be discovered. The qualified paleontologist shall develop appropriate training materials including a summary of geologic units present at the development site, potential paleontological resources that may be encountered during development, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to project development, and as new employees are added to the project site workforce. The qualified paleontologist shall provide awareness session sign-in sheets documenting employee attendance to the County as requested.</p> <p><b>Plan Requirements and Timing.</b> The worker awareness program shall be reviewed and approved by Planning &amp; Development prior to grading/building permit issuance. The Applicant shall provide Planning &amp; Development compliance monitoring staff with the name and contact information for the qualified consultant prior to grading/building permit issuance and pre-construction meeting.</p> <p><b>Monitoring.</b> The Applicant shall demonstrate that the worker awareness program conforms to the required conditions.</p> <p><b>GEO-2 Paleontological Resources Inadvertently Discovered During Grading</b></p> <p>If any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor, under the direction of the qualified paleontologist identified in Mitigation Measure GEO-1, shall:</p> <ul style="list-style-type: none"> <li>▪ Temporarily cease grading within 50 feet of the finds and redirect activity elsewhere to ensure the preservation of the resource in which the discovery was made;</li> <li>▪ Immediately notify the Santa Barbara County Planning and Development and Public Works Departments regarding the resource and redirected grading activity;</li> <li>▪ Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by Santa Barbara County Planning and Development; and</li> <li>▪ Complete all significance assessment and mitigation of impacts to the paleontological resource and verification reviewed and approved by Santa Barbara County Planning and Development prior to resuming grading in the area of the find.</li> </ul> <p>Upon discovery of potentially significant paleontological resources and completion of the above measures, the Applicant shall submit to Santa Barbara County Planning and Development a report prepared by the qualified paleontologist documenting all actions taken.</p>	<p>With incorporation of Mitigation Measures GEO-1 and GEO-2, the project would result in less than significant impacts to paleontological resources in the project area.</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<p><b>Plan Requirements and Timing.</b> This condition shall be printed on all building and grading plans.  <b>Monitoring.</b> Planning &amp; Development compliance monitoring staff shall confirm monitoring by the qualified consultant and grading inspectors shall spot check field work.</p>		
<p><b>Hazards and Hazardous Materials</b></p>		
<p><b>HAZ-1. Construction and operation would involve transport, use, and disposal of hazardous materials which could pose a potential hazard through upset or accident. However, all hazardous materials would be transported, handled, and disposed of in compliance with existing regulations and Environmental Health Services Requirements. this impact would be less than significant with mitigation.</b></p>	<p><b>HAZ-1 Risk Management Plan and Hazardous Materials Inventory</b>                      Prior to issuance of the certificate of occupancy, the Applicant shall coordinate with the County of Santa Barbara Environmental Health Services, the Certified Unified Program Agency (CUPA) for the project, to verify that the proposed facility is in compliance with California Health and Safety Code, Chapter 6.95, and Title 19 CCR, Division 2, Chapter 4. If required by Environmental Health Services, a Release Response Plan and/or Hazardous Materials Inventory shall be submitted to Environmental Health Services for review and approval at least 30-days prior to bringing ammonia or other hazardous materials on-site if more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials would be used on the project site. The Risk Management Plan shall include a prevention and emergency response plan and shall incorporate the safety features specified in the <i>Refrigeration Hazard Assessment Report for Permit Purposes</i> prepared for the project.  <b>Plan Requirements and Timing.</b> This measure shall be implemented prior to issuance of building permits and shall be included on all land use and building plans.  <b>Monitoring.</b> Planning &amp; Development compliance monitoring staff shall confirm completion of coordination with the County of Santa Barbara Environmental Health Services and, if applicable, shall confirm a Risk Management Plan and/or Hazardous Materials Inventory has been approved by Environmental Health Services.</p>	<p>Mitigation Measure HAZ-1 would minimize risk of accidental release and ensure that safety features assumed in the quantitative risk analysis are included in the required Risk Management Plan and Hazardous Materials Inventory. Implementation of this required mitigation would reduce impacts related to hazardous materials during operation to a less-than-significant level.</p>
<p><b>HAZ-2. Hazardous materials were historically used at the project site, including three abandoned oil and gas wells and a petroleum well transmission line. However, all three wells would be required to be abandoned in compliance with current CalGEM standards. No significant hazards or hazardous materials that exceed health standards were identified on the project site during the site reconnaissance or soil sampling. this impact would be less than significant with mitigation.</b></p>	<p><b>HAZ-2 Hazardous Substance Control and Emergency Response Plan and Environmental Training Program</b>                      A Hazardous Substance Control and Emergency Response Plan and Environmental Training Program shall be prepared by the construction contractor and approved by the County of Santa Barbara prior to construction. The Hazardous Substance Control and Emergency Response Plan shall include measures for safe cleanup of hazardous materials. The Environmental Training Program shall include training on identification of potentially hazardous substances. If any potentially hazardous waste or other hazardous materials are unearthed during construction, the construction contractor shall immediately stop work in the vicinity of the suspect material and contact the County of Santa Barbara Environmental Health Services, Site Mitigation Unit. Environmental Health Services shall evaluate the material and recommend the appropriate testing, removal, and disposal methods. The construction contractor shall ensure that any hazardous materials are removed or remediated in accordance with the requirements of Environmental Health Services and the Hazardous Substance Control and Emergency Response Plan. The construction contractor shall not resume work in the vicinity of the suspect hazardous material until approved by Environmental Health Services.  <b>Plan Requirements and Timing.</b> This measure shall be implemented during construction and shall be included on all grading and building plans.  <b>Monitoring.</b> Planning &amp; Development compliance monitoring staff shall confirm monitoring by the construction contractor and grading inspectors shall spot check field work.  <b>HAZ-3 No Further Action Determination</b>                      Prior to issuance of grading permits unrelated to re-abandonment or remedial activities, the Applicant shall obtain a No Further Action determination from the County of Santa Barbara Environmental Health Services, Site Mitigation Unit. To obtain the determination, the Applicant shall ensure that the petroleum wells on the project site are re-abandoned in compliance with current CalGEM standards pursuant to California Code of Regulations (CCR) Sections 1723.1 through 1723.5. Prior to initiation of re-abandonment activities, the Applicant shall obtain written approval from CalGEM to proceed with re-abandonment.  <b>Plan Requirements and Timing.</b> This measure shall be implemented prior to issuance of grading permits and shall be included on all land use, grading, and building plans.  <b>Monitoring.</b> Planning &amp; Development compliance monitoring staff shall confirm a No Further Action Determination has been obtained from the County of Santa Barbara Environmental Health Services.</p>	<p>Mitigation Measure HAZ-2 requires that Environmental Health Services be contacted if unknown hazardous materials are discovered during construction. If determined to be hazardous, the material would be required to be removed or remediated before construction activities are resumed. Mitigation Measure HAZ-3 would require re-abandonment of the on-site petroleum wells to current regulatory standards and issuance of a No Further Action determination. With implementation of Mitigation Measure HAZ-2 and HAZ-3, impacts related to hazardous materials during construction and operation would be reduced to a less-than-significant level.</p>
<p><b>Class II Cumulative Impacts (Significant but Mitigable)</b></p>		
<p><b>Biological Resources</b></p>		
<p>Continued development in the northern part of Santa Barbara County will cumulatively increase the potential for impacts to biological resources, in combination with the proposed project. There is a potential for the proposed project, when considered with the other cumulative projects, to contribute incrementally to cumulative impacts to habitat loss, to CDFW/RWQCB jurisdictional areas, and to sensitive plant and animal species in northern Santa Barbara County.</p>	<p>Cumulative impacts to biological resources are addressed on a project-by-project basis through site-specific investigations and surveys as well as the development of the assessment of potential impacts and prescription of appropriate mitigation. Mitigation Measure BIO-1 through BIO-3 include measures to avoid impacts to CRLF, southwestern pond turtle, and nesting bird habitat and individuals during construction activities. Mitigation Measures BIO-4 and BIO-5 require implementation of measures to reduce impacts to irrigation drainages during construction and compensatory mitigation for impacts to irrigation drainages through enhancement, restoration, and/or creation of habitat.</p>	<p>Implementation of these mitigation measures would reduce project-level impacts to biological resources to a less than significant level. The project site is currently being used for agricultural activities and the footprint of the proposed project is already comprised of developed and disturbed land. As such, the project's contribution to the cumulative loss of habitat and other cumulative impacts to biological resources would be less than significant.</p>



**Arctic Cold Agricultural Processor and Freezer Project**

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Cultural and Tribal Cultural Resources</b>		
<p>The project, in conjunction with other nearby planned, pending, and potential future projects would have the potential to adversely impact cultural resources.</p> <p>Development of past, present, and reasonably foreseeable future developments could cumulatively contribute to the erasure of Chumash tribal cultural resources from the landscape.</p>	<p>Implementation of Mitigation Measures CUL-1 would reduce the project’s potential impacts to cultural resources to a less than significant level. Compliance with Mitigation Measures CUL-2 and with the provisions of AB 52 would ensure that any known or potential tribal cultural resources are treated in consultation with local Native American groups.</p>	<p>Given that no tribal cultural resources have been identified on the project site and the site has low archaeological sensitivity due to on-site soil types and previous agricultural disturbance, impacts to any potential tribal cultural resources would be less than significant with mitigation and would not contribute to a significant cumulative effect.</p>
<b>Geology and Soils</b>		
<p>Cumulative projects would increase the potential for impacts to paleontological resources through construction activities in the area. The project site has a high potential for buried paleontological resources, and the project would be required to implement Mitigation Measures GEO-1 and GEO-2 to reduce impacts of the project on paleontological resources.</p>	<p>The project would be required to implement Mitigation Measures GEO-1 and GEO-2 to reduce impacts of the project on paleontological resources to less than significant.</p>	<p>Implementation of Mitigation Measures GEO-1 and GEO 2 would ensure the project would not have a cumulatively considerable contribution to a significant cumulative impact related to paleontological resources.</p>
<b>Class III Project Specific Impacts (Less than Significant)</b>		
<b>Aesthetics</b>		
<p>AES-1. The project would introduce new structural development on the project site that would obstruct views of the surrounding landscape from public roadways. Views from these roadways are not designated by the County of Santa Barbara as scenic views or vistas. This impact would be less than significant.</p>	<p>No mitigation measures are required because this impact would be less than significant.</p>	<p>n/a</p>
<p>AES-2. The project is located approximately 1.4 miles from U.S. 101, which is eligible for designation as a state scenic highway throughout Santa Barbara County. The project would not impact scenic resources within a State scenic highway.</p>	<p>No mitigation measures are required because this impact would be less than significant.</p>	<p>n/a</p>
<p>AES-3. The project would alter the visual character of public views of the site and its surroundings. Compliance with LUDC ordinances that govern design and development standards for new structural development in the AG-II zone would ensure this impact would be less than significant.</p>	<p>No mitigation measures are required because this impact would be less than significant.</p>	<p>n/a</p>
<p>AES-4. The project would introduce new sources of light and glare. Compliance with LUDC requirements for outdoor lighting (Section 35.30.120) would limit spillover onto adjacent properties and minimize light and glare interference to traffic. Therefore, this impact would be less than significant.</p>	<p>No mitigation measures are required because this impact would be less than significant.</p>	<p>n/a</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Agricultural Resources</b>		
AG-1. The project would result in the loss of FMMP-designated Prime Farmland and Unique Farmland for agricultural production. However, the project would not significantly impair the long-term agricultural suitability and productivity of the subject property. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
AG-2. The project would not conflict with existing zoning for agricultural use, or a Williamson Act or other agricultural preserve contract, and would not involve any other changes that would convert farmland to non-agricultural use. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Air Quality</b>		
AQ-1. The project would be consistent with the SBCAPCD 2019 Ozone Plan and its project assumptions. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
AQ-2. Proposed development would be required to implement fugitive dust and equipment exhaust measures which would reduce the project's annual maximum construction emissions. Impacts associated with temporary construction emissions would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
AQ-4. Neither construction nor operation of the project would result in emissions that would expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Cultural and Tribal Cultural Resources</b>		
CUL-2. Construction of the project would involve ground disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified human remains. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Greenhouse Gas Emissions</b>		
GHG-2. The project would be consistent with applicable plans, policies, and regulations that are adopted for the purpose of reducing GHG emissions. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a

**Arctic Cold Agricultural Processor and Freezer Project**

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Energy</b>		
E-1. The project would not result in wasteful or unnecessary energy consumption. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
E-2. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Geology and Soils</b>		
GEO-1. The project would not cause potential substantial adverse effects involving strong seismic ground shaking. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
GEO-2. The project would not result in substantial soil erosion or the loss of topsoil. Therefore, this impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
GEO-3. The project would discharge wastewater into an on-site processing basin. The project would be required to comply with County standards and permitting procedures. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Hydrology and Water Quality</b>		
HWQ-1. Construction activities could degrade water quality through increased rates of erosion and sedimentation and increased risk of spills. Compliance with NPDES permit and County grading code requirements and implementation of the required SWPPP and applicable BMPs would ensure that potential water quality impacts during project construction would be adverse, but less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
HWQ-2. Operational activities could degrade water quality through increased discharge of pollutants of concern. Compliance with NPDES permit requirements and implementation of the required SWMP and applicable BMPs would ensure that potential water quality impacts during project operation would be adverse, but less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
HWQ-3. Groundwater extraction could decrease groundwater supplies and increased impervious surface area could interfere with groundwater recharge. Potential groundwater impacts would be adverse, but less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
HWQ-4. New impervious surfaces would alter existing drainage patterns and increase stormwater runoff. Compliance with County design guidelines and SBCFCWCD requirements for post-development peak stormwater flows and implementation of BMPs and maintenance requirements described in the proposed project's Stormwater Control Plan would ensure	No mitigation measures are required because this impact would be less than significant.	n/a

Impact	Mitigation Measure (s)	Significance After Mitigation
that potential flooding impacts and impacts to on-site and off-site drainage would be adverse, but less than significant.		
<b>Land Use and Planning</b>		
LU-1. The project would be consistent with the applicable policies and development standards in the County of Santa Barbara’s Comprehensive Plan. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
LU-2. The project would result in a change in character of the site and the scale of development on the site. This change would not present a significant physical impact to the quality of the human environment. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Noise</b>		
N-1. Construction noise would not exceed County standards at the nearest single-family residences. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
N-2. Operational noise would not exceed County standards at the nearest single-family residences or any other sensitive receivers. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
N-3. Vibration from construction activities would be well below vibration thresholds at the nearest residences. This impact would be less than significant.	No mitigation measures are required because this impact would be less than significant.	n/a
<b>Transportation and Circulation</b>		
T-1. All frontage road improvements would be designed and reviewed per the County’s building and circulation standards to reduce conflict between vehicles and pedestrians/bicycles. This impact would be less than significant.	No mitigation measures are required because these impacts would be less than significant.	n/a
T-2. The project would generate 9.3 VMT/Employee. The County’s average VMT/Employee is approximately 15.8. Therefore, the proposed project would not exceed the applicable threshold of 15 percent below existing regional VMT/Employee (13.4 VMT/employee). This impact would be less than significant.	No mitigation measures are required because these impacts would be less than significant.	n/a
T-3. The project’s frontage improvements would be required to comply with County Standards and would therefore not hinder emergency access or substantially increase hazards. These impacts would be less than significant.	No mitigation measures are required because these impacts would be less than significant.	n/a

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Utilities and Service Systems</b>		
U-1. The project would be served by water suppliers with sufficient capacity, and would not require substantial new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. These impacts would be less than significant.	No mitigation measures are required because these impacts would be less than significant.	n/a
<b>Class III Cumulative Impacts (Less than Significant)</b>		
<b>Aesthetics</b>		
With adherence to applicable County review requirements, cumulative impacts related to aesthetics would be less than significant and the proposed project's contribution to potentially significant cumulative impacts related to aesthetics and visual resources not be cumulatively considerable.	No mitigation measures are required because the project's contribution to potentially significant cumulative impacts related to aesthetics and visual resources not be cumulatively considerable.	n/a
<b>Agricultural Resources</b>		
Cumulative development in the northern portion of Santa Barbara County would increase the incremental loss of prime and unique agricultural land in the County. Implementation of applicable policies and development standards in the Comprehensive Plan related to agricultural resources and compliance with applicable Santa Barbara County policies would minimize the incremental loss of prime and unique farmland but would not eliminate this cumulative impact to agricultural resources. <u>The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California.</u> In the context of northern Santa Barbara County, the project is intended to support historic crop production and agricultural productivity in the region by providing a supporting use for existing regional agricultural operations. <u>The project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. Consistency with this Land Use code requirement would ensure the proportion of produce coming into the processor facility from locations outside of a 25-mile radius would be relatively small. The typical local peak harvest period would be May through August. The portion of produce coming into the processor facility is planned to be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility.</u> Accordingly, the project would not contribute to the increased	No mitigation measures are required because the project's contribution to cumulative impacts to agricultural resources would not be cumulatively considerable.	n/a

Impact	Mitigation Measure (s)	Significance After Mitigation
conversion of prime and unique agricultural lands.		
<b>Energy</b>		
<p>Cumulative development in Santa Maria and the surrounding area would increase demand for energy resources. However, the combined increase in energy consumption in Santa Barbara County would not be expected to result in wasteful, inefficient, and unnecessary consumption of energy resources. Therefore, cumulative energy impacts would be adverse but less than significant.</p> <p>The project would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen and would include energy-saving features that would reduce the potential for wasteful, inefficient, and unnecessary consumption of energy resources. The project would not conflict with the Santa Barbara County ECAP, which was adopted to reduce the cumulative impact of energy consumption in the County.</p>	<p>No mitigation measures are required because the project would not have a cumulatively considerable energy impact.</p>	<p>n/a</p>
<b>Geology and Soils</b>		
<p>Cumulative development in the project vicinity would gradually increase the number of people exposed to potential geological hazards, including effects associated with seismic events such as ground rupture, seismic shaking, liquefaction, landslides, and expansive soils. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative development would increase ground disturbance in the vicinity of the project site, which would contribute to erosion and loss of topsoil in the area. Compliance with standard requirements would ensure that cumulative impacts associated with erosion and loss of topsoil would be less than significant.</p> <p>The project would involve the installation of an Onsite Wastewater Treatment System. Projects are required to submit percolation tests that ensure soils are adequate for on-site wastewater disposal.</p>	<p>No mitigation measures are required because the project would not have a cumulatively considerable contribution to a significant cumulative impact related to seismic hazards, erosion and loss of topsoil, or wastewater disposal systems.</p>	<p>n/a</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Hazards and Hazardous Materials</b>		
<p>Continued urban development in northern Santa Barbara County and the City of Santa Maria will cumulatively increase the potential for exposure to existing soil contamination, including organic chlorinated pesticides and other agricultural chemicals. Compliance with existing regulations would ensure cumulative impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during construction would be less than significant.</p> <p>In addition, all new development in Santa Barbara County is subject to review and oversight by the relevant resource agencies and as well as subject to applicable laws and regulations in place to minimize potential hazards. Accordingly, , no significant cumulative human health impacts are anticipated, and cumulative impacts related to hazards and hazardous materials would be less than significant.</p>	<p>No mitigation measures are required because the proposed project would not make a cumulatively considerable contribution to cumulative hazards and hazardous materials impacts.</p>	<p>n/a</p>
<b>Hydrology and Water Quality</b>		
<p>Potentially significant cumulative impacts could result from buildout of the region due to increased pollutant loading, storm flows, erosion and sedimentation, and flooding. The proposed project, as well as other cumulative development in northern Santa Barbara County, would be required to implement applicable County and state regulations. Compliance with the Construction General Permit, County grading code, the Santa Barbara County drainage design guidelines, and the Phase II MS4 requirements would ensure that each individual project would incorporate BMPs and other drainage facilities designed to address drainage and surface water quality protection.</p> <p>Additional water demand would occur with population growth associated with buildout of the northern part of Santa Barbara County. Individual projects are reviewed by the County to ensure that adequate water supplies are available to ensure that water supplied from groundwater would not substantially decrease groundwater supplies.</p>	<p>No mitigation measures are required because cumulative impacts to water quality, drainage, flooding, sedimentation, and groundwater resources would be adverse, but less than significant.</p>	<p>n/a</p>

Impact	Mitigation Measure (s)	Significance After Mitigation
<b>Land Use and Planning</b>		
<p>Potential land use conflicts would be addressed on a case-by-case basis as individual projects are reviewed by County decision-makers. Implementation of County policies and development standards in the Comprehensive Plan, General Plan, and LUDC related to land use would minimize these potential cumulative impacts.</p>	<p>No mitigation measures are required because cumulative land use impacts would be less than significant.</p>	<p>n/a</p>
<b>Noise</b>		
<p>Cumulative projects are not located in close enough proximity to the project site such that operational noise would impact the same sensitive receivers. The project's additional vehicles on area roadways would not result in a noticeable off-site traffic noise increase. The project's contribution to cumulative off-site traffic noise would be audible, which would be cumulatively considerable.</p>	<p>No mitigation measures are required because no cumulative operational noise impacts would occur.</p>	<p>n/a</p>
<b>Transportation and Circulation</b>		
<p>Based on technical guidance from the Governor's Office of Planning and Research, if a project has a less than significant impact on VMT using an efficiency-based threshold (e.g., VMT per resident), the project would not contribute to a cumulative VMT impact (OPR 2018). As such, the project would have a less than significant impact on VMT and would not result in a considerable contribution to a cumulative VMT impact.</p> <p>Potential impacts associated with emergency access and transportation hazards would be site-specific and would not have corresponding cumulative effects.</p>	<p>No mitigation measures are required because the project would not result in a considerable contribution to a cumulative VMT impact.</p>	<p>n/a</p>
<b>Utilities and Service Systems</b>		
<p>Cumulative development in the area will continue to increase demands on the Santa Maria Groundwater Basin, which has adequate capacity to serve existing uses through the cumulative year.</p> <p>The project would not connect to municipal wastewater facilities and would treat and dispose of wastewater on site.</p> <p>Cumulative projects would be required to comply with SBCFCWCD drainage requirements to control and reduce on-site stormwater flows. These requirements would ensure that cumulative projects would not substantially affect existing stormwater drainage systems or result in inadequate facilities for the control of stormwater runoff.</p> <p>PG&amp;E and SCG would have sufficient electricity and natural gas supplies for the project and</p>	<p>No mitigation measures are required because the project would not result in a substantial contribution to a cumulative groundwater impact, cumulative wastewater impact, cumulative stormwater drainage impact, or cumulative electricity, natural gas, or telecommunications impact.</p>	<p>n/a</p>



Impact	Mitigation Measure (s)	Significance After Mitigation
would not place a significant demand on the electrical supply. Cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the project.		

# 1 Introduction

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This document is an Environmental Impact Report (EIR) for a proposed agricultural processor and freezer facility located at 1750 East Betteravia Road in Northern Santa Barbara County, just east of the City of Santa Maria. The proposed Arctic Cold Project (hereafter referred to as the “project”) would be constructed on a site currently used for agricultural purposes with a mix of row crops, livestock grazing, and a vegetable cooling plant that is not a part of the project. Other components of the project include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

This section discusses (1) the legal basis for preparing an EIR; (2) the scope and content of the EIR; (3) the lead, responsible, and trustee agencies; and (4) the environmental review process required under the California Environmental Quality Act (CEQA). The project is described in detail in Section 2, *Project Description*.

## 1.1 Purpose and Legal Authority

The proposed project requires the discretionary approval of the Santa Barbara County Board of Supervisors. Therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

“...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

“This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.”

This EIR is to serve as an informational document for the public and Santa Barbara County decision makers. The process will include public hearings before the Board of Supervisors to consider certification of a Final EIR and approval of the project.

## 1.2 Environmental Scoping

The County of Santa Barbara distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on October 23, 2020 and ending on November 23, 2020. The County received letters from two agencies in response to the NOP during the public review period. The NOP and NOP responses are presented in Appendix A of this EIR. Table 1-1 summarizes the content of the letters and verbal comments and where the issues raised are addressed in the EIR.

**Table 1-1 NOP Comments and EIR Response**

Committer	Comment/Request	How and Where It Was Addressed
<b>Agency Comments</b>		
California Department of Conservation, Geologic Energy Management Division (CalGEM)	CalGEM reviewed the site plans and identified three plugged and abandoned wells impacted by the development. CalGEM encloses a comment letter with recommendations and comments originally sent on December 20, 2019 (Enclosure 1). CalGEM’s recommendations and comments specified in Enclosure 1 are still applicable for this project.	Project components are discussed in Chapter 2, <i>Project Description</i> . The three former petroleum wells would be re-abandoned to current standards as part of the project.
	CalGEM provided comments and recommendations regarding the project’s office location and rig access for well “Vincent” 9 (API 083-02661).	This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County’s standard application review process.
	CalGEM does not approve building permits but offers recommendations to local planning agencies.	This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County’s standard application review process.
	CalGEM recommends obtaining opinions from multiple rig companies regarding rig access requirements, taking into consideration this specific site and well construction	This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County’s standard application review process.
	Review rig contractor opinions and ensure approved placement of office allows for adequate rig access and does not in any way impede access to the well	This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County’s standard application review process.
	CalGEM recommends the re-abandonment of the three wells (see table and enclosure).	Project components are discussed in Chapter 2, <i>Project Description</i> . The three former petroleum wells would be re-abandoned to current standards as part of the project.
	CalGEM categorically advises against building over, or in any way impeding access to oil, gas, or geothermal wells.	Comment is addressed in Section 4.9, <i>Hazards and Hazardous Materials</i> . The project would not impede access to active wells. The three former petroleum wells would be re-abandoned as part of the project.
	CalGEM recommends that the exact location of the wells be determined. Surveyed locations should be provided to CalGEM in latitude and longitude, NAD 83 decimal format. CalGEM advises that the wells be inspected and tested for liquid and gas leakage prior to, or during development activities.	Comment is addressed in Section 4.9, <i>Hazards and Hazardous Materials</i> . Results of the soil and soil gas assessments are discussed in Section 4.9.
	To ensure that present and future property owners are aware of (a) the existence of all wells located on the	This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of

Commenter	Comment/Request	How and Where It Was Addressed
	<p>property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the above identified well(s), and any other pertinent information, be communicated to the appropriate County Clerk Recorder for inclusion in the title information of the subject real property.</p>	<p>Santa Barbara as part of the County's standard application review process.</p>
	<p>CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.</p>	<p>Comment is addressed in Section 4.9, <i>Hazards and Hazardous Materials</i>. Potential impacts associated with contaminated soil and requirements for disposal are discussed in Section 4.9.</p>
<p>California Department of Transportation (Caltrans)</p>	<p>Caltrans supports projects that support small growth principals which include improvements to pedestrian, bicycle, and transit infrastructure.</p>	<p>Project components are discussed in Chapter 2, <i>Project Description</i>.</p>
	<p>Caltrans looks forward to seeing trip-reducing elements included to lower traffic impacts and potential mitigation associated with the change of metric from Level of Service (LOS) to Vehicle Miles traveled (VMT).</p>	<p>Project components are discussed in Chapter 2, <i>Project Description</i>. Transportation impacts, including an analysis of the project's potential to result in new VMT, are addressed in Section 4.2, <i>Transportation and Traffic</i>.</p>
	<p>Caltrans does not support projects that include more parking spaces than required.</p>	<p>Project components are discussed in Chapter 2, <i>Project Description</i>.</p>
	<p>Caltrans states that the East Cat Canyon traffic study (cited in the Revised Traffic and Circulation Study for the project dated July 21, 2020) was found to be flawed and should not be used as a baseline or point of reference.</p>	<p>This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County's standard application review process.</p>
	<p>Caltrans requests early coordination with the County of Santa Barbara and the applicant to further discuss any necessary conditions of approval or mitigation measures.</p>	<p>This comment does not make recommendations related to the environmental analysis in the EIR. The comment will be reviewed by the County of Santa Barbara as part of the County's standard application review process.</p>
	<p>Caltrans notes that any encroachment into a State right-of-way will require a permit from Caltrans and must be completed to Caltrans' engineering and environmental standards.</p>	<p>The project does not include components that would encroach into a State right-of-way. Project components are discussed in Chapter 2, <i>Project Description</i>.</p>

Through the NOP and EIR scoping process, the County determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the areas of recreation and wildfire. No further environmental review of these issues is necessary for the reasons summarized in the Section 4.15, *Effects Not Found to be Significant*. The substantiation for determining that these issues would result in no impact, or a less-than-significant impact is described in further detail in the NOP in Appendix A, pursuant to Section 15128 of the *CEQA Guidelines*.

**Arctic Cold Agricultural Processor and Freezer Project**

This EIR addresses impacts identified by the initial scoping process to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in detail in the EIR:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities and Service Systems

In preparing the EIR, use was made of pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References*.

Section 6, Alternatives, was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the “environmentally superior” alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required “No Project” alternative and two alternative development scenarios for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

## 1.3 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. Santa Barbara County is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the ~~State Water Resources Control Board (SWRCB)~~ Central Coast Regional Water Quality Control Board (RWQCB) for review of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit application and issuance of a waste discharge requirements permit for wastewater systems, and the County Flood Control District for review of the proposed detention basin system, the State Water Resources Control Board for approval for the proposed public water system, California Department of Fish and Wildlife (CDFW) for administering the California Endangered Species Act and the California Fish and Game Code, United States Fish and Wildlife Service (USFWS) will be a responsible agency for implementing the Federal Endangered Species Act, and Santa Barbara County Air Pollution Control District (SBCAPCD) for review of project equipment subject to SBCAPCD permit requirements and prohibitory rules.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. The California Department of Fish and Wildlife (CDFW) has jurisdiction over biological resources, including waters of the State and rare and endangered plant species. The Central Coast Regional Water Quality Control Board (RWQCB) also has jurisdiction over non-wetland waters. As these resources may be affected by project development, the CDFW and RWQCB are trustee agencies for the project.

## 1.4 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

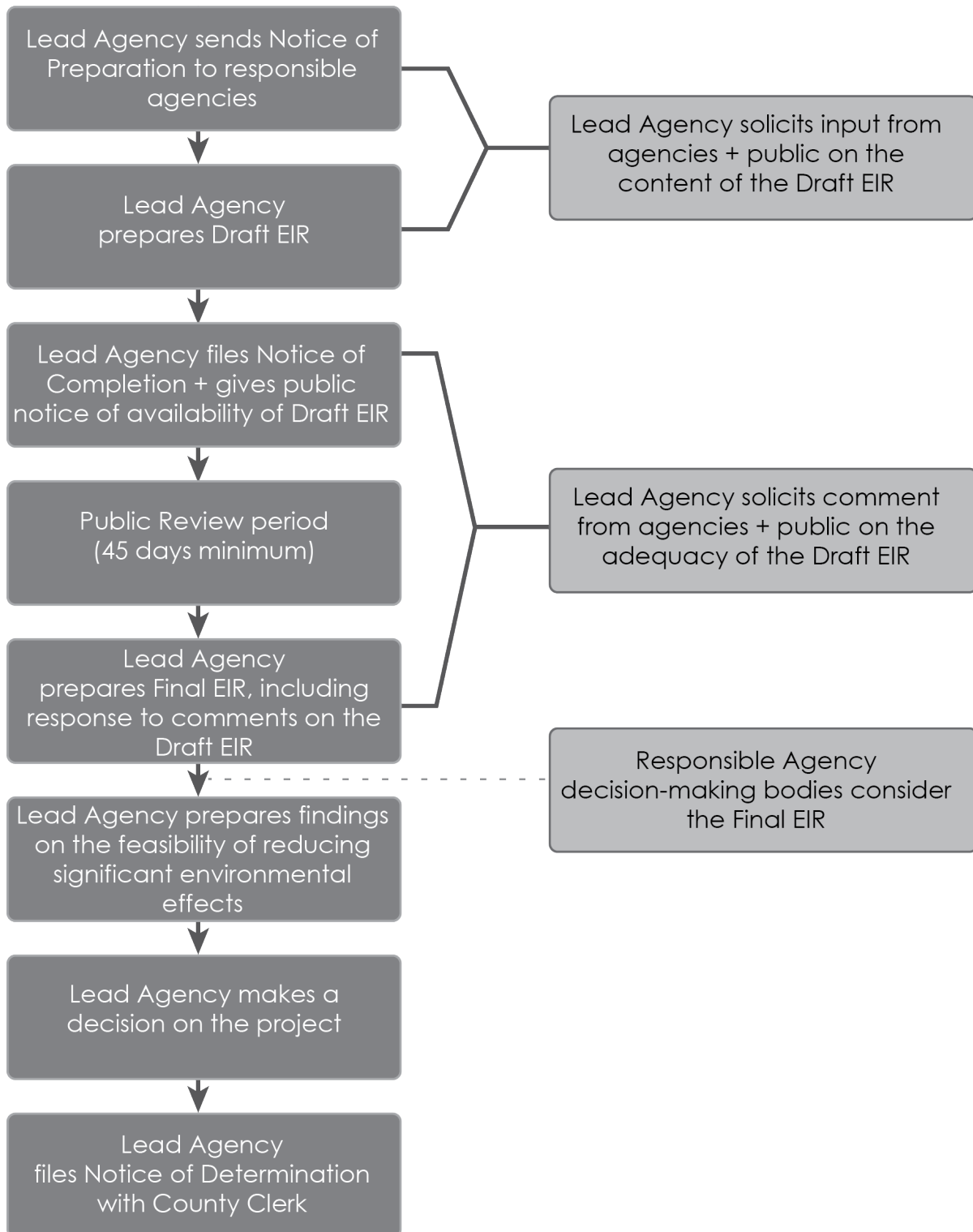
1. **Notice of Preparation.** After deciding that an EIR is required, the lead agency (Santa Barbara County) must file a Notice of Preparation (NOP) soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). Executive Order N-54-20 (issued April 22, 2020) suspended the requirement that lead agencies post the NOP in the County Clerk's office for 30 days. Executive Order N-80-20 (issued September 23, 2020) extended the prior suspension by Executive Order N-54-20 of public noticing requirements.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion/Notice of Availability.** The lead agency must file a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability (NOA) of a Draft EIR. The lead agency must place the NOA in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOA to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and

**Arctic Cold Agricultural Processor and Freezer Project**

occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).

4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

**Figure 1-1 Environmental Review Process**





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## 2 Project Description

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This section describes the proposed project, including the project applicant, the subject property, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

### 2.1 Project Applicant

AFP, LLC; Great 1031, LLC  
P.O. Box 1862  
Santa Maria, California 93458  
(805) 348-3600

### 2.2 Lead Agency Contact Person

Holly R. Owen, Supervising Planner  
County of Santa Barbara  
Planning and Development  
624 West Foster Road, Suite C  
Santa Maria, California 93455  
(805) 934-6297

### 2.3 Project Location

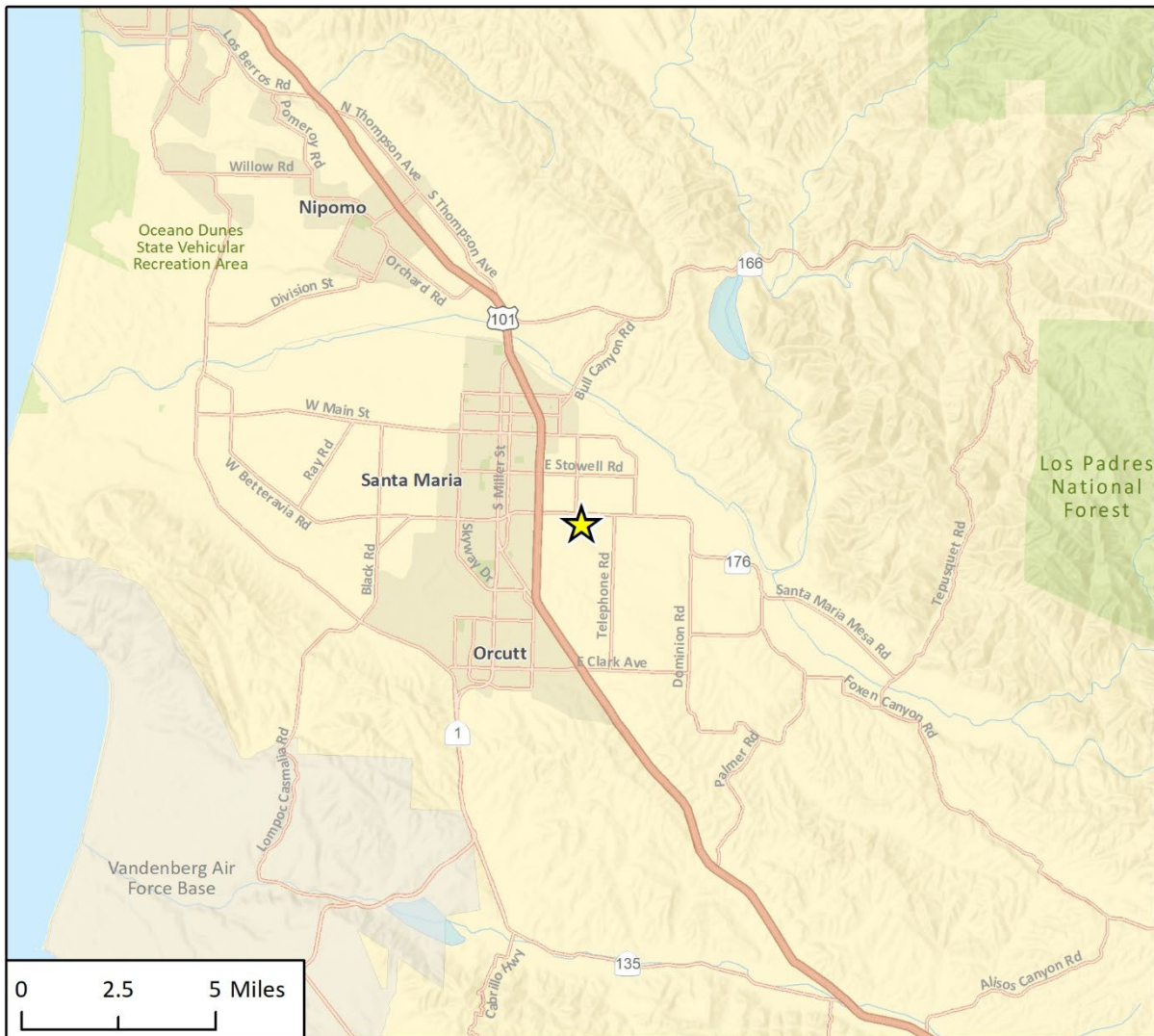
The subject property is located at 1750 East Betteravia Road approximately one mile east of the City of Santa Maria in northern Santa Barbara County. The property is located on the east side of Rosemary Road, approximately 1.1 miles east of U.S. Highway 101 (U.S. 101) and is comprised of two parcels (Assessor Parcel Numbers [APN] 128-097-001 and 128-097-002), totaling approximately 109 acres. The property is bound by Rosemary Road on the west, East Betteravia Road on the north, and Prell Road on the south. Active agricultural operations surround the property in all directions. The proposed processor and freezer facilities would be located on approximately 40 acres on the northeast portion of the subject property ("project site"). Figure 2-1 shows the regional location of the project site, while Figure 2-2 shows the project site and subject property in the local context.

### 2.4 Existing Site Characteristics

#### 2.4.1 Current Land Use and Zoning

The subject property is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). The existing vegetable cooling plant is located on the southwest portion on the property and would not be removed or modified as part of the proposed project. The property is zoned AG-II (Agricultural II) with a corresponding zoning map symbol of AG-II-40.

Figure 2-1 Regional Project Location



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★ Project Location

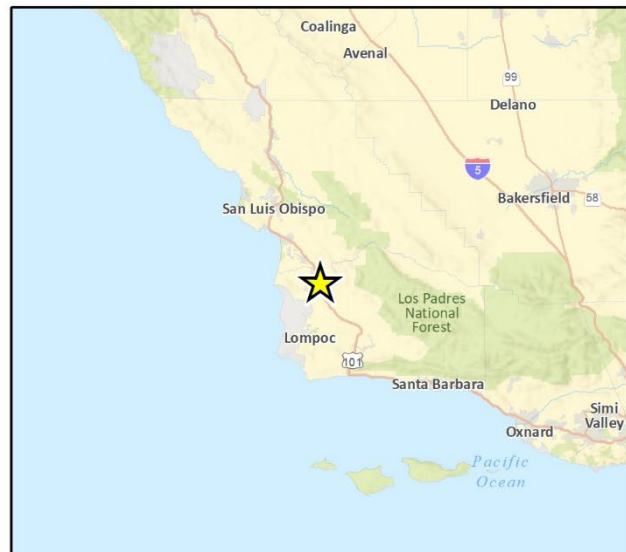


Fig 2 Regional Location

Figure 2-2 Subject Property and Project Site Boundary



Imagery provided by Microsoft Bing and its licensors © 2021.

Fig. 2-2 Project Location

As described in the Santa Barbara County Land Use & Development Code (LUDC), the AG-II zone is applied to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area, as shown on the County's Comprehensive Plan maps, with the intention of preserving these lands for long-term agricultural use. The AG-II-40 zone expands upon the underlying AG-II zoning to specify that the minimum gross lot area/building site area for development of the property is 40 acres (LUDC Section 35.21.040, County of Santa Barbara 2020).

There are 10 existing petroleum wells on the subject property. Of these existing wells, eight were plugged and abandoned between 1962 and 1985 and two are classified as idle. Three of the abandoned wells are located on the 40-acre project site, with the remaining seven wells located off site. An abandoned petroleum transmission line also runs through the subject property from the northwest corner to the southwest corner, crossing the southwestern portion of the 40-acre project site.

## 2.4.2 Surrounding Land Uses and Zoning

The subject property is surrounded in all directions by agricultural uses, including Central City Cooling and row crops located across Betteravia Road to the north and row crops to the east, south, and west. The properties to the north, south, and east are zoned AG-II-40. The property to the west is zoned AG-II-100.

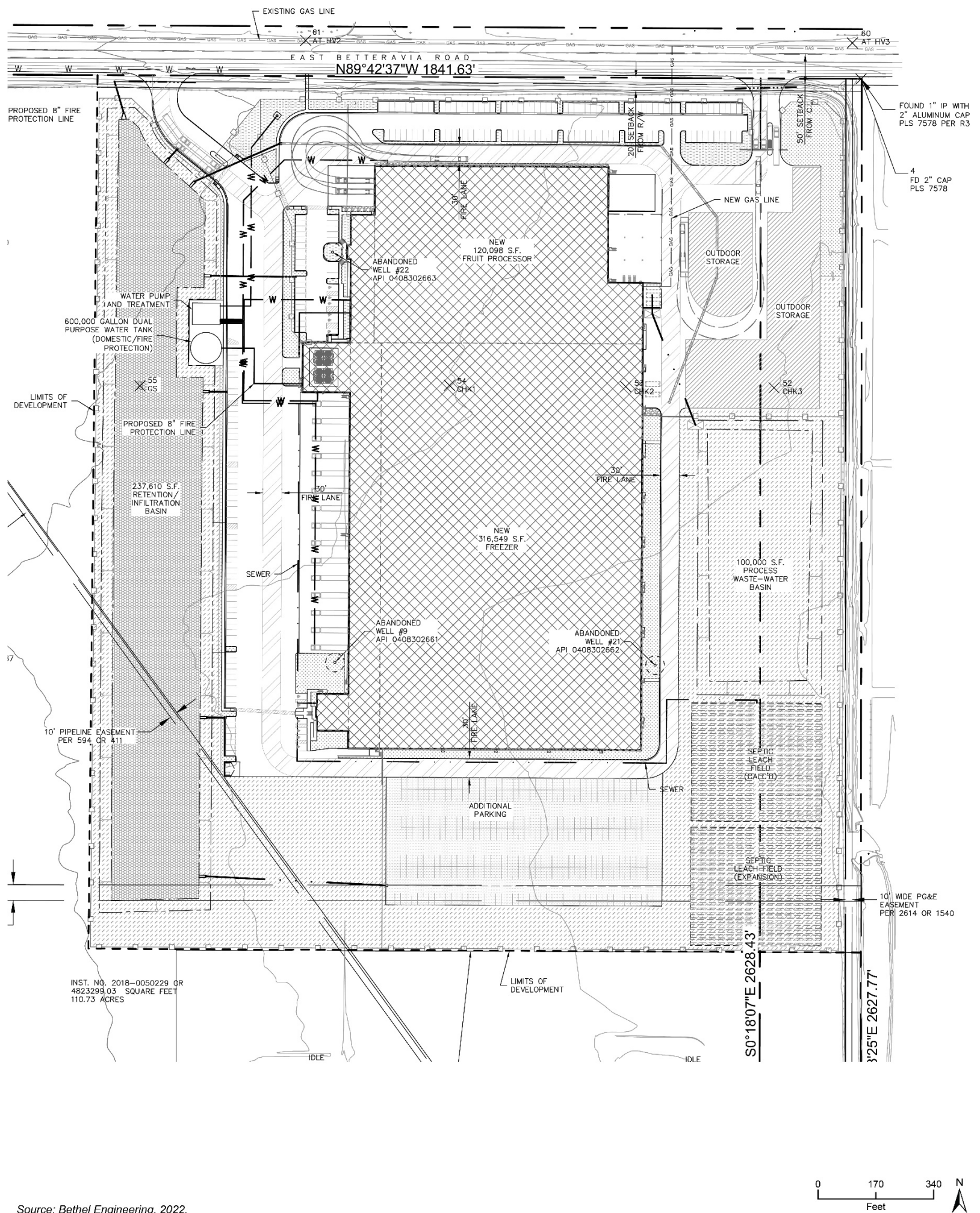
## 2.5 Project Characteristics

The proposed project involves a Conditional Use Permit and Development Plan to allow development of a 449,248 square-foot (sf) gross floor area agricultural processor and freezer facility on a 40-acre project site located in the northeastern portion of the subject property. Other components of the project include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

### 2.5.1 Proposed Site Plan

Figure 2-3 shows the proposed site plan for the project and Figure 2-4 shows distant and close-up visual renderings of the project from U.S. 101 and East Betteravia Road. Table 2-1 provides the proposed project characteristics, including the building area for each of the primary components of the proposed processor and freezer facilities.

Figure 2-3 Project Site Plan



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**Figure 2-4 Visual Renderings of the Proposed Project**



**Conceptual View 1.** Conceptual view of proposed project from U.S. 101, facing east.



**Conceptual View 2.** Conceptual view of proposed project from East Betteravia Road, facing southeast.



**Table 2-1 Project Characteristics**

Address	1750 East Betteravia Road	
APNs	128-097-001 (99.0 acres) and 128-097-002 (9.8 acres)	
Height/Stories		
Processor	41.1 feet from existing grade <sup>1</sup> /45.2 feet from finish grade <sup>2</sup>	
Freezer	53.3 feet from existing grade <sup>1</sup> /57.4 feet from finish grade <sup>2</sup>	
Lot Area	108.8 acres (subject property) 40.0 <sub>1</sub> acres (project site)	
<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors) for Processor</b>		
Processing	76,371 sf	
Cooler	10,500 sf	
Dry Storage/Warehousing	19,708 sf	
Administrative	15,410 sf	
Maintenance	5,557 sf	
Canopy	10,859 sf	(not Included in total)
Processor Subtotal	127,546 sf	
<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors) for Freezer</b>		
Freezer	263,716 sf	
Dock	32,784 sf	
Blast Freezer	10,276 sf	
Administrative	7,222 sf	
Mechanical	7,704 sf	
Freezer Subtotal	321,702 sf	
<b>Total Processor and Freezer Operational Gross Floor Area</b>	<b>449,248 sf</b>	

sf = square feet

<sup>1</sup> 300 ft above mean sea level (msl)

<sup>2</sup> Approximately 4 ft 2 in below existing grade, or 295 ft 10 in above msl. Totals may not sum exactly due to rounding.

## 2.5.2 Facilities Operations

The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California, Mexico for processing. Most of the produce would be sourced from the area within 25 miles of the County boundary. A smaller portion (approximately 10%) of produce coming into the processor facility would be sourced from outside the area within 25 miles of the County boundary. This import would be timed with off-season needs to supplement local produce. Once the produce has been staged and checked for quality, produce would be washed, sorted (defects will be temporarily stored for composting), and conveyed to processing equipment throughout the facility. Processing includes slicing, dicing, and freezing, adding sugar and other ingredients, and making purees and puree concentrates pursuant to client requirements. The project would not be permitted to do any milling, juicing or pasteurization, pursuant to consistency with applicable County agricultural standards (LUDC 35.42.040.B.1.b). Once processed, the finished product would be packaged and conveyed to the attached cold storage for blast freezing and storage until ready to ship out to customers.

The freezer facility would specialize as a cold distribution warehouse. Product would be received and entered into a computerized warehouse management system (WMS), which would determine whether the product would be placed in cold room storage or blast freezers. Product would be stored in cold rooms until it is shipped out to regions throughout the United States.

Support facilities would include offices and dry storage/warehousing. Most of the processor equipment would be electric-driven; except for four 100 horsepower (hp) low NO<sub>x</sub> boilers, one 300 hp low NO<sub>x</sub> boiler, and four propane forklifts.

### 2.5.3 Circulation

Access to and from the project site would be from East Betteravia Road. The developer would be required as a condition of approval to dedicate to the County an additional 12-foot roadway easement along Betteravia Road for the purpose of formalizing a half width right of way to 52 feet. The developer would be required to design and construct pavement for all roadwork based on the appropriate road detail provided in the Santa Barbara County Engineering Design Standards.

The proposed operations would involve the use of various types of field trucks, semi-trucks, and large vans. Truck traffic would primarily occur during the processing harvest season from May through September. Trucks would deliver the crops to the facility from local fields to be processed by the tenant processor (fruit) and to the freezer facility (other crops). Outbound trucks would deliver frozen produce to area and regional markets as well as throughout the nation and to international shipping facilities. This transport is not dependent on harvest seasons and would consist of regularly scheduled deliveries of up to 30 trucks inbound/outbound per day, or 60 average daily trips (ADT), throughout the entire year for freezer operation. Vans used by the processors would deliver processed fruits to area markets by demand. Processor operations would require an average of 10 inbound/outbound vans (20 ADT) and 10 inbound/outbound field trucks (20 ADT) per day, or a total of 40 ADT, during the non-harvest season. During harvest season, processor operations would require an average of 24 inbound/outbound vans (48 ADT) and 52 inbound/outbound field trucks (104 ADT) per day, or a total of 152 ADT.

Truck circulation patterns are detailed in the Traffic Study prepared by Associated Transportation Engineers (ATE), included in Appendix L to this EIR. On-site truck loading times would typically be limited to between 6:00 AM and 10:30 PM Monday through Friday. Truck staging would occur entirely on-site.

### 2.5.4 Employees

The processor and freezer facilities would each have two shifts for hours of operation, as follows:

- Freezer: 6:00 AM to 2:00 PM, and 2:30 PM to 10:30 PM
- Processor: 6:00 AM to 4:00 PM, and 5:30 PM to 3:00 AM

A sanitation crew would be on-site from 2:00 AM to 5:00 AM, with administrative personnel operating at various different schedules throughout the year and days. During the non-harvest season (August to May), the project would require approximately 153 employees. During the harvest season (May to August) the project would require approximately 623 employees.

## 2.5.5 Parking

~~Based on County parking requirements, the various components of the project would result in a total required parking provision of 569 parking spaces. The project would provide 223 permanent parking spaces and 365 permanent/seasonal parking spaces, for a total of 588 parking spaces. The project would also provide 12 handicap parking spaces.~~ project applicant is required to provide a total of 622 parking spaces for the proposed processing, warehouse, and offices uses. The applicant has requested a modification to reduce the required number of parking spaces from 622 to 532. The applicant will be required to provide a Traffic Demand Management Plan (TDMP) to reduce the number of Vehicle Miles Traveled (VMT) and reduce the demand for employee parking spaces. The TDMP will include programs for company-sponsored vanpools, carpool promotion and dedicated carpool spaces, assistance with employee enrollment in Emergency Ride Home, and TDMP marketing materials. The vanpool and carpool programs are anticipated to reduce parking demands by a minimum of 90 spaces. The proposed site plan would provide parking for 222 permanent employees along the northern and western portions of the site and 310 seasonal employee parking spaces at the southern end of the building. The project would provide 12 ADA-compliant parking spaces. Permanent employee parking would be surfaced with asphalt/concrete and seasonal employee parking would be surfaced with Class II road base. All parking spaces would be designated with painted striping.

## 2.5.6 Landscaping

The project would include approximately 16 acres (699,000 sf) of landscaping, primarily along the eastern and western perimeters, in the stormwater retention areas and basins, and in the parking areas. Irrigated landscaping (i.e., shrubs, trees, turf) would comprise approximately 1.8 acres and non-irrigated landscaping (i.e., open area, basins) would comprise approximately 14.3 acres of the site.

## 2.5.7 Grading/Drainage

Development of the project would require approximately 64,876 cubic yards (cy) of soil cut and 50,311 cy of soil fill, balancing out to approximately 14,565 cy net soil cut. Due to the generally flat topography of the project site (average slope of less than two percent), a maximum two-foot fill slope is needed to construct the proposed storm water and process water retention infrastructure.

The project would add approximately 19.7 acres of impervious surface, in the form of paving and structural development, to the project site.

## 2.5.8 Equipment

Most of the equipment used in the processor would be electric driven, except for the following equipment: four 100 horsepower (hp) Miura Low NO<sub>x</sub> Boilers; one 300 hp Miura low NO<sub>x</sub> boiler; and four propane forklifts. All equipment associated with the freezer operation would be electric. A more detailed discussion of these project components is included in the Air Quality and Greenhouse Gas Analysis included as Appendix C to this EIR.

The preliminary refrigeration system design would be an industrial ammonia system estimated at 1,800 tons to serve freezers, blast freezing cells, freezer storage, cooler rooms, and shipping docks for the proposed facilities. The refrigeration system is estimated to have a total of 7,500 hp at 480 volts (V) using about 31,374,000 kilowatt-hours (kWh) per year.

The machinery room would house 12 compressors, one recirculatory package, and five ammonia pressure vessels.

### 2.5.9 Water Use

Water is currently used for existing agricultural production of approximately 90 acres of row crops, including strawberries and broccoli, on the project parcel. According to the Ground Water Analysis and addendums (Appendix I) prepared for the project, existing water use for irrigation on the project parcel is between 240 and 400 acre-feet per year (AFY) (an average of 320 AFY). The project would result in the removal of approximately 40 acres of crop production from the subject property. Accordingly, the project would reduce water demand for irrigation by 120 to 200 AFY (an average of 160 AFY).

Based upon metered volumes from another similar facility for the same company that would operate the project, the proposed new freezer and processor would result in an anticipated maximum water demand of approximately 72.0 AFY and 200.6 AFY, respectively. The domestic (potable) and landscaping components of the project would result in an additional water demand of approximately 4.9 AFY. Overall, the project results in an anticipated maximum water demand of approximately 277.5 acre-feet per year. Additionally, it is estimated that 60 percent of the process and cooling water (133 AFY) would return to the groundwater through infiltration. Overall, the project would result in an anticipated total net groundwater demand of 145 AFY (277.5 AFY of water demand minus and the 133 AFY being returned to the groundwater basin). Based on the existing water usage estimate of approximately 160 AFY on the 40-acre project site, the project would decrease on-site groundwater demand by approximately 15 AFY compared existing conditions.

There is an existing well that is used for irrigation purposes on the project site. However, the existing well does not have the necessary sanitary seal to be used for potable water. The project would include installation of a new well to service the project site. The new well would provide potable water as well as water for emergency purposes, such as fire suppression. The applicant has indicated they may seek a connection to the City of Santa Maria's public water supply, if such connection is found to be feasible. However, for the purposes of this EIR the project is assumed to be supplied by the proposed new well.

### 2.5.10 Wastewater

Wastewater generation rates from the project would vary substantially throughout the year, with peak volumes generated during the harvest season. All wastewater generated from the processor would be treated in accordance with State of California water quality standards and would be discharged into a 100,000 sf process wastewater basin on the eastern portion of the project site (refer to Figure 2-3). The wastewater basin would be designed to infiltrate the water within 24 hours so all wastewater minus what evaporates in the 24-hour period percolates through the soil profile back to the groundwater basin. The processor is anticipated to generate approximately 200.6 acre-feet per year of wastewater, equivalent to the water demand for this component of the project.

Domestic wastewater (from on-site uses such as sinks and toilets) would be discharged to the on-site septic leach fields located on the southeast corner of the project site (refer to Figure 2-3).

Residual loss of water would occur as a result of freezer condensation and evaporation on the coils as well as consumption and disposal of potable water to a proposed domestic septic system on the southeastern portion of the development area (refer to Figure 2-3). Based on the performance of at other locations where similar units have been installed, approximately two-thirds of the anticipated water demand of 72 AFY would be lost through evaporation; therefore, the freezer is anticipated to generate approximately 24 acre-feet per year of wastewater.

### 2.5.11 Stormwater

Stormwater runoff would be directed to a retention/infiltration basin located along the western boundary of the project site (refer to Figure 2-3). The retention/infiltration basin would reduce pollutants in stormwater and reduce peak flows of stormwater discharged from the project site by infiltrating stormwater.

### 2.5.12 Petroleum Well Abandonment

There are three existing petroleum wells on the 40-acre project site, at the northeast portion of the subject property. An abandoned petroleum well transmission line also runs through the subject property from the northwest corner to the southwest corner, crossing the southwestern portion of the project site. In their Notice of Preparation (NOP) response letter dated December 20, 2019, California Geologic Energy Management Division (CalGEM, previously known as the Division of Oil, Gas, and Geothermal Resources Regulatory Program [DOGGR]) recommended that the three petroleum wells within the project site be re-abandoned to current standards. CalGEM also advised that the petroleum wells not be built over or their access impeded. Per this requirement, all three petroleum wells on the 40-acre project site would be re-abandoned in compliance with current CalGEM standards. Additionally, the proposed buildings would not be constructed over the petroleum wells.

## 2.6 Project Objectives

The primary objectives for the project are as follows:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

## 2.7 Required Approvals

Implementation of the project would require the following discretionary approvals from the County of Santa Barbara:

- **Development Plan** due to scale of project (no by right construction for this use): LUDC 35.82.030.C.2.b.1 requires a development plan for Agricultural Structural Development if the proposed project is greater than 15,000 sf;
- **Conditional Use Permit** due to proposed use: off-premise product-producing facilities (Table 2-1: LUDC 35.21.030);
- Petroleum Division and CalGEM ~~on~~ regarding the proposed **re-abandonment plans** (under the most current abandonment standards) for the three former petroleum wells (Vincent 9, 21, and 22) within the project footprint;

- LUDC Section 34A-4(b) requires that an application for a water **well construction permit** shall include a plot plan indicating the location of the well with respect to the existing water well on the property; and
- Although a **Solid Waste Management Plan (SWMP)** would not be required until building permits are sought, the Standards for Agricultural Processing Facilities in LUDC Section 35.42.040.B.1.b(3) specify that all process water and waste material from ~~milling~~ produce processing shall be managed onsite as recycled irrigation water or organic compost.

In addition to the above required approvals, the Central Coast Regional Water Quality Control Board (RWQCB) will be a responsible agency for coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, ~~issuance of a Domestic Water Supply Permit for a non-community, non-transient water system~~, and issuance of a waste discharge requirements permit for wastewater systems. The County Flood Control and Water Conservation District will be a responsible agency for review of the proposed detention basin system. The California Department of Fish and Wildlife (CDFW) will be a responsible agency for administering the California Endangered Species Act and would authorize “take” of state listed species by reviewing application for and issuance of an Incidental Take Permit subject to Sections 2081(b) and 2081(c) of the California Fish and Game Code. The United States Fish and Wildlife Service (USFWS) will be a responsible agency for implementing the Federal Endangered Species Act and would authorize incidental “take” of federally listed species through Section 7 or Section 10 of the federal Endangered Species Act. The Santa Barbara County Air Pollution Control District (SBCAPCD) will be a responsible agency for the proposed boilers and any other regulated stationary sources of pollutant emissions. SBCAPCD inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal and state Clean Air Acts. For drilling the well as a public water system for the project, approval for the project will be required from the State Water Resources Control Board. Additionally, Environmental Health Services will require a water system technical report, the approval from the State Water Resources Control Board, and testing of the new well before issuing a Zoning Clearance.

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## 3 Environmental Setting

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This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

### 3.1 Regional Setting

The project site is located in the Santa Maria Valley, a roughly east-west trending valley in northern Santa Barbara County. The Santa Maria Valley is bound by the Nipomo Mesa and Sierra Madre Mountains on the north and east, by the Solomon Hills and Casmalia Hills on the south, and by the Guadalupe Dunes and Pacific Ocean on the west.

The Santa Maria Valley is a flat coastal plain whose native vegetation consists primarily of coastal dune sage. The edges of the valley are characterized by rolling hills with oak woodlands, native and non-native grasses, and chaparral. Much of the area is rural in nature, characterized by such uses as grazing, crude oil production, open space, and cultivated agriculture, which is the dominant land use due to the valley's fertile alluvial soils and exceptional climate for crop production.

Important water features in the Santa Maria Valley include Twitchell Reservoir, Betteravia Lakes (also known as Guadalupe Lake), the Santa Maria River, and Orcutt/Solomon, Pine, Graciosa, and San Antonio Canyon Creeks. The Santa Maria River is the principal drainage for the valley. It is formed at the confluence of the Cuyama and Sisquoc Rivers and ultimately drains into the Pacific Ocean near the Santa Barbara County/San Luis Obispo County border.

The Santa Maria Valley's Mediterranean climate is characterized by warm, dry summers and cool, damp winters with occasional rainy periods. Annual rainfall typically ranges from about 13 to 18 inches, with nearly all precipitation occurring between October and April. Light to moderate sea breezes generally predominate during the day, while land breezes from the east dominate during night and early morning hours.

### 3.2 Project Site Setting

The project site is in the Santa Maria area of northern Santa Barbara County. United States Highway 101 (U.S. 101) serves as the eastern city limit of the City of Santa Maria. The project site is located approximately 1.1 miles east of U.S. 101. The project site is bound by Rosemary Road on the west, East Betteravia Road on the north, and Prell Road on the south. The project site includes two parcels totaling 108.7 acres, with the limits of ground disturbance for the proposed new processor and freezer facilities covering approximately 40 acres within the site. The project site is currently used for agricultural purposes with a mix of row crops, livestock grazing, and the existing vegetable cooling plant that is not part of the project. The existing vegetable cooling plant comprised of two buildings totaling 58,000 square feet is located on the southwest portion on the project site.

There are 10 existing oil wells on the project site, eight of which have been plugged and abandoned and two of which are classified as idle. The two idle wells and five of the abandoned wells are located outside of the limits of disturbance for the project. Three of the abandoned wells are located within the limits of project disturbance. An abandoned oil well transmission line also runs through the project site from the northwest corner to the southwest corner, crossing the southwestern portion



of the project disturbance area. There are two existing groundwater wells located on the project site that supply water for agricultural purposes. Rural agricultural lands surround the project site in all directions.

The project site elevation is approximately 300 feet above mean sea level throughout the site. Soils on the project site consists of Betteravia Loamy Sand (BmA) and Pleasanton Sandy Loam (PnA). The site gently slopes to the northwest. Storm water runoff discharges to an existing irrigation ditch along the northern project site boundary along the south edge of East Betteravia Road. The nearest natural water source to the project site is the Santa Maria River, located approximately 3.4 miles to the northeast.

### 3.3 Cumulative Development

A project's cumulative impacts are the possible environmental effects that may be cumulatively considerable when considered with other reasonably foreseeable projects (*CEQA Guidelines* Section 15065[a][3]). Cumulatively considerable impacts occur when the incremental effects of a particular project or program are significant when viewed in connection with the effects of other past, current, or probable future projects or programs that are not incorporated into baseline or existing conditions.

As defined in Section 15355 of the *CEQA Guidelines*, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. According to Section 15130 of the *CEQA Guidelines*, the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact. Impacts that do not result in part from the project evaluated in an EIR need not be discussed.

The impact subsections of Section 4 of this EIR discuss the potential cumulative environmental impacts resulting from the project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project area. The list cumulative projects considered in this analysis was based on planned, pending, and reasonably foreseeable projects at the time of the Notice of Preparation in October 2020. Cumulative development in the northern portion of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed (in process), approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project. Table 3-1 lists the northern Santa Barbara County projects included in the cumulative impact analyses, and Table 3-2 lists the City of Santa Maria projects included in the cumulative impact analyses.

**Table 3-1 Northern Santa Barbara County Cumulative Projects List**

<b>Project Name/APNs</b>	<b>Status</b>	<b>Number of Units, Square Footage, or Misc.</b>
<b>Residential Projects</b>		
Stoker Development Plan 097-730-021	Approved	14 units
Terrace Villas Tract Map 14,770 129-300-001 to -020	Approved	16 units
Addamo Winery/Diamante [TM 14,616] 129-151-042	Approved	5 units
TKLA Tract Map 101-192-003 101-192-004	Approved	7 lots/14 units
Oak Hills Estates 197-371-010	Approved	29 units
Vintage Ranch (Key Site 7) 101-400-008	Approved	52 units
Sagunto Place Supportive Housing Project 143-184-002	Approved	23 units
Clubhouse Estates Tract Map (TM 14,629) 097-371-008	Under Construction	52 units
Rice Ranch Development Plan 101-010-013 101-020-004 105-140-016	Under Construction	725 units
Key Site 30 MR-O Apartments and Fine Grading 107-250-008	Under Construction	214 units
Key Site 30 Development Plan 107-250-008	Under Construction	69 units
Key Site 3 Development Plan and Tract Map 129-151-026	In Process	279 units
Skytt Family Lot Split (TPM 14,745) 099-190-039 099-190-040	Approved	Parcel Map, 4 units
<b>Commercial Projects</b>		
Orcutt Union Plaza Phase II Amendment 105-121-006	Approved	19 residential units and 16,880 sq ft commercial
Inn At Mattei's Tavern 135-073-008 135-073-009 135-073-007 135-064-027 135-064-028 135-064-024 135-064-025 135-064-026 135-064-021	Approved	67 residential units and 74,587 sq ft commercial

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<b>Project Name/APNs</b>	<b>Status</b>	<b>Number of Units, Square Footage, or Misc.</b>
Sagebrush Junction 101-260-006 101-260-007	Approved	8 residential units and 5,600 sq ft commercial
Orcutt Gateway (Key Site 2) 129-280-001	Approved	42,941 sq ft
Clark Avenue Commercial (Key Site 4) 103-750-038	Under Construction	12,875 sq ft
Nojoqui Ranch Tier II Winery 081-020-024	Under Construction	12,500 sq ft
OASIS General Plan Amendment 105-020-063 105-020-064	In Process	15,333 sq ft
Orcutt Fuel 107-011-028	In Process	5,054 sq ft
<b>Institutional Projects (schools, churches, assisted living, jails, etc.)</b>		
The Golden Inn & Village 141-380-014	Approved	36,991 sq ft (Assisted living/memory care facility)
North County Jail General Plan Amendment 113-210-004 113-210-013	Approved	250,465 sq ft
<b>Wineries</b>		
Larner Tier II Winery 137-100-001	Approved	4,702 sq ft
Santa Rosa Road Tier II Winery 083-170-015	Approved	17,300 sq ft
Spear Winery Tier II	Approved	19,775 sq ft
Pence Ranch Winery Development Plan Amendment 099-220-013	Approved	19,979 sq ft
<b>Other (Oil, Gas, Energy, Mining)</b>		
Sepulveda Building Materials Mining Rev to 90-Rp-001 083-060-009 083-060-015 083-070-010 083-070-018	In Process	2,000 tons/year
PCEC Solar Photovoltaic System Grading 101-020-074	In Process	20 acres of solar development

Project Name/APNs	Status	Number of Units, Square Footage, or Misc.
ERG Oil & Gas Pipeline Development Plan	In Process	2.9-mile oil pipeline
129-080-006		
129-080-007		
129-090-016		
129-090-021		
129-090-032		
129-090-033		
129-090-037		
129-090-038		
129-100-014		
129-100-015		
129-100-025		
129-100-034		
129-100-035		
129-100-036		
129-180-007		
129-180-008		
129-180-013		
129-180-015		

Source: County of Santa Barbara 2020c

**Table 3-2 City of Santa Maria Cumulative Projects List**

Name/Address	Status	Number of Units, Square Footage, or Misc.
<b>Residential Projects</b>		
Cox Bungalows 1141 W. Cox Ln	Under Construction	29 affordable special needs units, 1 caretaker unit
123 Fesler Apartments 123 E. Fesler St	In Process	23 unit, 9750 sq ft apartment building
309 Mill Apartments 309 E. Mill St	In Process	23 unit, 9750 sq ft apartment building
School Mill Apartments 424 E. Mill St	Under Construction	9 unit apartment
Kimbell Western Units 134 N. Western	Approved	9 unit multifamily residential development
Residences at Depot Street 301 N. Depot St	Under Construction	80 unit affordable apartments
Vino Bella Apartments 120 W Chapel St	In Process	32 unit, 3-story apartment building
Casa Buena Court 905 W. Cook St.	Approved	4 dwelling units
Ormonde Apartments 521 S. Pine St	Approved	4 apartment units
Pine at Boone Townhouses 529 S Pine St	In Process	8 3-story townhouses with two buildings

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Name/Address	Status	Number of Units, Square Footage, or Misc.
Oakley Court Apartments 600 Block S. Oakley Ct	Approved	30 apartment units with on-site manager's unit
Sierra Madre Cottages 624 E. Camino Colegio	Under Construction	39 affordable senior apartments
Vandenberg Senior Residences 1314 S. Broadway	Approved	52 unit senior apartment addition
Centennial Square Miller St. at Plaza Dr.	Approved	138 unit apartments
Barcellus Senior Apartments 502 E Barcellus Ave.	Approved	80 unit senior apartments
Centennial Gardens Battles at Depot	In Process	160 affordable apartment units
Webster Manor 539 E Newlove Dr	In Process	5 3-story townhomes in one building
SerraMonte Townhomes 2065 S. Blosser Rd.	Approved	81 townhome units
Newlove East Apartments 575 E. Newlove Dr.	Approved	16 unit apartments
Easton Apartments E. Battles Rd at College Dr.	Under Construction	318 unit apartments
H2A Workforce Dormitories 1900 block of S. A St.	In Process	Workforce housing dormitories
Santa Maria Studios 2660 Santa Maria Way	In Process	Affordable housing project
Northman Residential Santa Maria Wy at E Dauphin St.	Approved	63 single family residences
<b>Commercial Projects</b>		
Preisker Commercial Center NW/c N. Broadway and Preisker Ln.	Under Construction	108 room hotel, 15,000 sq ft drive-thru restaurant, retail
Dutch Brothers Coffee 1700 block of N. Broadway	Approved	Coffee kiosk with drive-thru
North Broadway Shell Building 1700 block of N. Broadway	Approved 9,000 sq ft AutoZone and 6,200 multi-tenant building constructed 4,473 sq ft commercial shell building in process	26,879 sq ft commercial center
Peppertree Chevron 1601 N. Broadway	Under Construction	1,675 sq ft retail and 12 fuel pumps
Santa Maria Alliance 1519 N. Broadway	Under Construction	New canopy and site improvements at gas station

Name/Address	Status	Number of Units, Square Footage, or Misc.
Santa Maria Medical Center 1520 N. Broadway	Under Construction	10,150 sq ft medical office building
Orchard Street Corner Market 1334 N. Broadway	Approved	1,043 sq ft addition to existing corner market
Superior Sound Systems 1108 N. Broadway	Approved	1,800 sq ft building
Blosser Coin Laundry 122 S. Blosser Rd.	Approved	4,410 sq ft coin laundry facility
Hassin Retail Building 711 W. Church St.	Under Construction	4,000 sq ft retail building
Westgate Marketplace S. Blosser Rd. at W. Battles Rd.	Approved	68,000 sq ft commercial center
Joshi Commercial 116 W. Enos Dr.	Approved	3,200 sq ft retail
McDonald's 1710 S. Broadway Ave	Approved	4,554 sq ft drive-thru restaurant
Smile Santa Maria Dental 1925 S. Broadway	Approved	7,750 sq ft dental office
Enos Ranchos Mercado E. Betteravia Rd. at S. College Dr.	Approved	80,900 sq ft shopping center
Enos Auto Center South Lot 2-7 Enos Ranchos	Under Construction	Design/layout of auto center
Enos Auto Center South Lot 8-11 Enos Ranchos	Under Construction	Design/layout of auto center
Lot 5 Auto Lot 5&6 Enos Ranchos	Under Construction	29,000 sq ft auto dealership
Lot 11 Auto Lot 11 Enos Ranchos	Under Construction	28,000 sq ft auto dealership
Honda Lot 10 Enos Ranchos	Under Construction	44,900 sq ft auto dealership
Splash N Dash Lot 8 Enos Ranchos	Approved	8,200 sq ft car wash
Home Motors S. Bradley Rd. and E. Battles Rd.	Under Construction	52,000 sq ft auto dealership
Lot 5 Auto Lot 5 Enos Ranchos	Under Construction	29,000 sq ft auto dealership
Toyota Lot 4 Enos Ranchos	Under Construction	73,000 sq ft auto dealership
Santa Maria Freeway Center 1000 E. Betteravia Rd.	Approved 1,898 sq ft gas station and Popeye's restaurant constructed	23,455 sq ft retail on 5 pads

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Name/Address	Status	Number of Units, Square Footage, or Misc.
Crossroads Expansion Pads 2100-2300 S. Bradley Rd.	Under Construction (2 pads completed)	27,700 sq ft retail on 3 pads
A Street Deli W. Betteravia Rd. at A St.	Approved	4,420 sq ft retail building
VTC Enterprises (Phase 2) 2445 A St.	Approved Classroom building constructed (12,023 sq ft)	6,187 sq ft vocational training building
U-Haul Ministorage and Office 2875 Santa Maria Way	Approved	Exterior improvements to existing building and interior remodel to include mini-storage
<b>Industrial Projects</b>		
Chavez Farming 1965 Roemer Pl.	Under Construction	16,000 sq ft office and warehouse
Santa Maria Tire Company 1900 block of N. Preisker Ln.	Under Construction	8,000 sq ft tire sales/service building
SMOOTH Bus Wash 240 E Roemer Wy.	Approved	1,134 sq ft bus wash building
Candyman Shop 320 N. Russell Ave.	Approved	6,670 sq ft multi-tenant building
Bonita Packing Expansion 1850 W. Stowell Rd.	Approved Phase 1 (45,935 sq ft) constructed	173,270 sq ft addition in 4 phases
Maxco Cooler and Box Facility 1550 W Stowell Road	In Process	38,350 sq ft cooler building, 60,000 sq ft outdoor storage yard
Central Coast Truck Center W. Stowell Rd & Hanson Way	Approved	37,300 sq ft building for the sales and repair of semi-trucks
Lineage Logistics 1315 S. Blosser Rd.	In Process	210,000 sq ft processing facility addition
Windset Farms Greenhouses 7-9 1650 Black Rd.	In Process	4.3 million sq ft greenhouses and 93,000 sq ft building
Betteravia Self Storage 1265 W. Betteravia Rd.	Under Construction	109,955 sq ft self-storage facility
DMS Electric 2224 S Westgate Rd	Approved Phase I (5,000 sq ft) constructed	10,000 sq ft building
Tava Corp 2329 Thompson Way	Approved	33,000 sq ft multi-tenant complex
Mattress Xpress 100 Tama Ln.	Approved	22,917 sq ft of office/warehouse building
2811 Center 2811 Airpark Dr.	Approved One 25,800 sq ft building constructed	51,200 sq ft office in 2 buildings

Name/Address	Status	Number of Units, Square Footage, or Misc.
Platino Development 2900 block of Industrial Pkwy.	In Process	48,717 sq ft in 4 buildings on 4 lots
The Gas Company 3138 Industrial Pkwy.	Approved	Natural gas fueling station
Skyway Office Building 3200 Skyway Dr.	Under Construction	19,800 sq ft office building
<b>Mixed Use/Other Projects</b>		
Carpenters Union Training 2210 N. Preisker Ln.	Approved	30,000 sq ft vocational training
Rivergate-Roemer Ranch N. Broadway/U.S. 101 Interchange	In Process	General Plan amendment and rezone
Clean N Dash 214 E. Donovan Rd.	Approved	2 residential units, 6,720 sq ft commercial
The Kitchen 600 N. Broadway	In Process	7,795 sq ft commercial/residential mixed use
Gateway Mixed Use 101 N. Broadway	Approved	33,700 sq ft 4-story mixed use building
Bathia Mixed Use 311 N. Miller Street	Approved	1,533 sq ft commercial and 6 residential units
D&J's Sober Living Facility 819 W. Church, 113 S. Benwiley	Approved	Mixed use with transitional housing and offices
Heritage Square Downtown Apartments 110 S. Lincoln	Approved	10 efficiency apartment units
Miller & Boone Mixed Use	In Process	33,600 sq ft mixed use building
Boone Street Market 501 E. Boone St.	Approved	2,280 sq ft addition to market and 2 residential units
Blosser Southeast S. Blosser Rd at W. Battles Rd	In Process	Amendment to Blosser Southeast Specific Plan
Aquistapace Tentative Map Blosser Southeast (Area 5A) Specific Plan	In Process	16 lots (residential, commercial, public facility, open space)
Rancho Harvest Land Use Map/Zone Change S. Blosser Rd at La Brea Ave.	In Process	Revise the land use and zone designations
Betteravia Plaza W. Betteravia Rd. at SMVRR	Approved	272 apartments and 381,250 sq ft retail/offices
Crucified Life Church NW/c S. McClelland Street	Approved	11,700 sq ft church building
Celebration I, II, III S. Miller St. at E. Inger Dr.	Approved Phase I constructed	56 single family units, 33 senior apartments, 7,000 sq ft commercial, 1 mixed use building
Fairway Commercial 1223 Fairway Drive	In Process	Industrial use to commercial use



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Name/Address	Status	Number of Units, Square Footage, or Misc.
First Baptist Church Master Plan 2970 Santa Maria Way	In Process	Site master plan
Airport Business Park Specific Plan Amendment Orcutt Expressway (Highway 135) at Union Valley Parkway	In Process	Specific Plan with multiple land uses
Phillips 66 Various locations	In Process	Replace and relocate segments of the existing Line 300 pipeline system
Lakeview Mixed Use NW/c S. Broadway and Skyway Dr.	Approved	164 apartments and 11,000 sq ft commercial
Source: City of Santa Maria 2020a		

## 4 Environmental Impact Analysis

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This section discusses the possible environmental effects of the project for the specific issue areas that were identified through the Notice of Preparation (NOP)/scoping process as having the potential to experience significant effects.

A “significant effect” is defined by the *CEQA Guidelines* Section 15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

Section 15065 of the *CEQA Guidelines* also requires the following specific Mandatory Findings of Significance be addressed as part of the environmental review for the project:

**Arctic Cold Agricultural Processor and Freezer Project**

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;
- Project impacts that are individually limited, but cumulatively considerable. (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

Section 4.4, Biological Resources, describes the project’s potential effects of the project on plant and animal species populations, habitats, communities, and migratory patterns. Section 4.5, Cultural Resources and Tribal Cultural Resources, describes the project’s potential effects on important historical and prehistorical cultural and tribal cultural resources on the project site. Potential adverse environmental effects to human beings are discussed in Section 4.3, Air Quality, Section 4.7, Geology and Soils, Section 4.9, Hazards and Hazardous Materials, Section 4.10, Hydrology and Water Quality, Section 4.11, Land Use and Planning, and Section 4.13, Noise. Furthermore, as discussed above, each environmental analysis section of the EIR concludes with a discussion of the project’s contribution to cumulative effects.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the project.

## 4.1 Aesthetics

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### 4.1.1 Environmental Setting

#### **a. General Vicinity**

The project site is located in the Santa Maria Valley, a roughly east-west trending valley in northern Santa Barbara County. The Santa Maria Valley is a mostly flat coastal plain, bordered by the Sierra Madre Mountains on the north and east, by the Solomon Hills to the south, and the Casmalia Hills and the Pacific Ocean to the west. Native vegetation in the region consists of oak woodlands, native and nonnative grasses, and chaparral. Outside of the urbanized areas, the visual character is characterized by grazing, open space, crude oil production, and cultivated agriculture uses. Agriculture is the dominant land use because of the valley's fertile, alluvial soils and exceptional climate for crop production.

U.S. Highway 101 (U.S. 101) and State Route (SR) 1 provide the primary travel corridors in the Santa Maria Valley and Santa Maria area. U.S. 101 is located approximately 1.3 miles west of the project site; SR 1 is located approximately 4.8 miles southwest of the project site. Throughout Santa Barbara County, U.S. 101 is eligible for designation as a scenic highway and is officially designated from the area near the western boundary of Goleta to SR 1 at Las Cruces, in what is known as the Gaviota Coast Scenic Highway (California Department of Transportation [Caltrans] 2019a). U.S. 101 is not designated as a State Scenic Highway in the vicinity of the project site. SR 1 is designated as a scenic highway between U.S. 101 at Las Cruces and SR 246 near Lompoc but is not eligible for designation elsewhere in Santa Barbara County. The project site is not be visible from the designated state scenic highway.

#### **b. Project Site**

The project site is located approximately 4.5 miles east of central Santa Maria and approximately 1.3 miles east of the U.S. 101/Betteravia Road interchange. The project site is under agricultural cultivation and is surrounded by other agricultural uses with some agriculture-related development in the form of warehouses, water tanks, and other agriculture-serving infrastructure.

Views from the project site include the Sierra Madre Mountains to the east and northern reaches of the Casmalia foothills to the west and southwest in the background, agriculture-related development and above-ground power transmission lines in the middle-ground, and cultivated agricultural fields in the foreground in every direction. Existing views from the project site are shown in Figure 4.1-1 and Figure 4.1-2.

**Figure 4.1-1 Eastward view across the project site, with Betteravia Road to the left**



Source: Rincon Consultants, Inc. 2020



Source: Rincon Consultants, Inc. 2020

As shown in in Figure 4.1-1 and Figure 4.1-2, opaque fencing screens the cultivated fields. Occasional supporting infrastructure, such as water storage tanks or irrigation stanchions are visible from adjacent roadways. Between adjacent roadways and the background hillsides, cultivated row crops are visually dominant. Unlined irrigation canals separate the project site from the roadways, where smartweed patches, ruderal vegetation, and stumps from removed trees are visible (refer to Section 4.4, Biological Resources, for a detailed discussion of vegetation on and adjacent to the project site). Otherwise, little or no landscaping exists on or adjacent to the project site.

The project site is visually consistent with surrounding land uses, which are also under cultivation and feature minimal structural development. The adjacent property on the north side of Betteravia Road, directly across from the project site, includes a produce processing and cooling warehouse. This adjacent structure, shown in Figure 4.1-3, is approximately 35 feet tall, uniformly rectangular, with corrugated siding, and no windows.

**Figure 4.1-3 Adjacent use, looking north from northern edge of the project site**



Source: Rincon Consultants, Inc. 2020

## 4.1.2 Regulatory Setting

### a. State Regulations

#### **State Scenic Highway Program**

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. U.S. 101 is eligible for designation throughout Santa Barbara County, but is not designated as a State Scenic Highway in the vicinity of the project site (Caltrans 2019b).

### b. Local Regulations

#### **Santa Barbara County Comprehensive Plan**

Santa Barbara County regulates the design of the built environment through its Comprehensive Plan (Santa Barbara County 2009; 2016). New development is required to be consistent with the Comprehensive Plan visual resource policies and development standards. The Land Use and Open Space Elements include policies pertaining to design of development and preservation of scenic resources. Applicable policies from the Land Use Element include:

- Visual Resource Policy 1, which requires all commercial, industrial, and planned developments to submit a landscaping plan to the County for approval;
- Visual Resource Policy 2, which requires the height, scale, and design of structures in areas designated as rural on the land use plan maps to be compatible with the character of the surrounding natural environment;
- Visual Resource Policy 4, which requires signage to be of size, location, and appearance so it does not detract from scenic areas or views from public roads and other viewing points; and
- Visual Resource Policy 5, which requires utilities to be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

#### **Santa Barbara County Land Use and Development Code**

County of Santa Barbara Land Use and Development Code (LUDC) includes development standards protecting visual resources (Santa Barbara County 2020a).

##### *LUDC Section 35.21.050 Development Standards for Agricultural Zones*

The LUDC states that development in AG-II zones must be compatible with the character of the surrounding natural environment, subordinate in appearance to natural landforms, and sited so that it does not intrude into the skyline as seen from public viewing places. At a minimum, development in AG-II zones must comply with the following design standards:

1. Exterior lighting shall be for safety purposes only and shall comply with the following requirements: (a) Light fixtures shall be fully shielded (full cutoff) and shall be directed downward to minimize impacts to the rural nighttime character. (b) To the extent feasible, lighting shall be directed away from habitat areas, nearby residences, public roads, and other areas of public use.
2. Building materials and colors (earth tones and non-reflective paints) compatible with the surrounding natural environment shall be used to maximize the visual compatibility of the

development with surrounding areas. Specifically, impacts from exterior lighting, including signs, shall be reduced as stated above.

LUDC does not include height limits for non-residential development on parcels zoned AG-II.

#### *LUDC Section 35.30.120 Outdoor Lighting*

The LUDC provides restrictions on outdoor lighting to protect against spillover onto adjacent properties and to minimize interference from lighting to vehicular traffic on private/public streets. It stipulates that all exterior lighting shall be hooded and designed such that it does not interfere with vehicular traffic on any portion of a street. Light trespass and glare are to be reduced to the maximum extent feasible through downward directional lighting methods.

#### *LUDC Section 35.34 et al. Landscaping Requirements*

The LUDC requires that landscape plans be provided as a condition of permit approval in compliance with Section 35.34.50 through 100. A landscape design professional must prepare the landscape plans according to the County's handout, "Landscape Plan and Performance Security Procedures." The Planning Department and the North County Board of Architectural Review (NBAR) review and approve the landscape plans as part of project permitting and approval processes.

### **North County Board of Architectural Review**

NBAR has review authority over the Santa Maria region and is responsible to review project plans with the purpose of encouraging "development which exemplifies the best professional design practices so as to enhance the visual quality of the environment, benefit surrounding property values, and prevent poor quality of design" (Santa Barbara County 2018). Among other criteria, NBAR evaluates project design to ensure that impacts on visual resources are minimized. These evaluations include reviewing the structure's shape, scale, layout, location, and orientation; mechanical and electrical equipment integration; material, color, and composition; harmony with existing and proposed development on adjoining properties; and landscaping, signage, and lighting.

## 4.1.3 Impact Analysis

### **a. Methodology and Significance Thresholds**

#### **Methodology**

Assessing the visual impacts of a project involves two steps. First, the existing visual resources of the project site are evaluated. Important factors in this evaluation include the physical attributes of the site, its visibility, and its uniqueness. The visibility of an area refers to the public's ability to access views of and through that area. Consistent with the requirements for evaluating visual resources described in the State California Environmental Quality Act (CEQA) Guidelines, all views discussed herein refer to public views. The Santa Barbara County Environmental Thresholds and Guidelines Manual (Santa Barbara County 2020b) identifies four types of areas as especially important in terms of visibility: coastal areas, mountainous areas, the urban fringe, and travel corridors.

Next, the potential impact of the project is determined by assessing on-site visual resources and views in the project vicinity that may be partially or fully obstructed by the project. This involves determining compliance with local and State policies regarding visual resources. The County's Comprehensive Plan



**Arctic Cold Agricultural Processor and Freezer Project**

Open Space Element identifies the following potentially significant visual resources (Santa Barbara County 2009b):

- Scenic highway corridors;
- Parks and recreational areas;
- Views of coastal bluffs, streams, lakes, estuaries, rivers, watersheds, mountains, and cultural resource sites; and
- Scenic areas.

**Significance Thresholds**

Appendix G of the CEQA guidelines considers a project to have a significant visual impact if the project would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; or
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The following questions from the Santa Barbara County Environmental Thresholds and Guidelines Manual are intended to provide information to address the Appendix G criteria in the CEQA Guidelines. Affirmative answers to the following questions indicate potentially significant impacts to visual resources (Santa Barbara County 2020b):

- 1a. Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible?
- 1b. If so, does the proposed project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?
- 2a. Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)?
- 2b. If so, does the project have the potential to conflict with the policies set forth in the Coastal Land Use Plan, the Comprehensive Plan, or any applicable community plan to protect the identified views?
3. Does the project have the potential to create a significantly adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

## b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project have a substantial adverse effect on a scenic vista?

**Impact AES-1** THE PROJECT WOULD INTRODUCE NEW STRUCTURAL DEVELOPMENT ON THE PROJECT SITE THAT WOULD OBSTRUCT VIEWS OF THE SURROUNDING LANDSCAPE FROM PUBLIC ROADWAYS. VIEWS FROM THESE ROADWAYS ARE NOT DESIGNATED BY THE COUNTY OF SANTA BARBARA AS SCENIC VIEWS OR VISTAS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project site is visible from Betteravia Road to the north, Rosemary Road to the west, and Prell Road to the south. Betteravia Road is a two-lane arterial roadway with one lane in either direction and is used primarily for east/west travel by agricultural workers and commuters. Rosemary Road is a two-lane collector road with one lane in either direction that serves mostly agricultural uses. Prell Road is a two-lane roadway primarily traveled by agricultural workers driving equipment and commuting to their places of work. Section 4.13, Transportation and Circulation, provides a detailed discussion of these roadways and average and anticipated future traffic volumes. Public views from public roadways are characterized by vast, open fields under agricultural cultivation in every direction, framed by the hillsides and ridgelines of the surrounding mountains. Existing views of cultivated agricultural uses are interspersed with occasional views of structural development and agricultural infrastructure, including the existing produce processing and cooling warehouse across Betteravia Road to the north. No public roadways in the project site vicinity are designated scenic corridors or identified in the County's Comprehensive Plan as offering important vistas.

The project would introduce new structural development that would obstruct currently unimpeded views of the landscape in an agriculturally zoned area. However, the proposed development would be visually consistent with existing nearby development, including the existing produce processing and cooling warehouse across Betteravia Road to the north. The project would not obscure a designated scenic view. Therefore, the project's potential impact to scenic vistas would be less than significant.

### Mitigation Measures

No mitigation is required because this impact would be less than significant.

**Threshold 2:** Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Impact AES-2** THE PROJECT IS LOCATED APPROXIMATELY 1.4 MILES FROM U.S. 101, WHICH IS ELIGIBLE FOR DESIGNATION AS A STATE SCENIC HIGHWAY THROUGHOUT SANTA BARBARA COUNTY. THE PROJECT WOULD NOT IMPACT SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY.

U.S. 101 is eligible for designation as a State Scenic Highway throughout Santa Barbara County, but is not designated as a State Scenic Highway in the vicinity of the project site. The project site is approximately 1.4 miles from the interchange of Betteravia Road and U.S. 101. At this interchange, the existing topography and vegetation provides limited views in the direction of the project site. The conceptual illustrations of the project development provided in Section 2, Project Description, illustrate views of the proposed structure from U.S. 101 (refer to Figure 2-4, View 1). As shown in this illustration, the proposed structure would not be prominently visible from U.S. 101, and would not obscure views of the more distant hillsides. There are no scenic resources adjacent to U.S. 101 that

would be affected by views of development on the project site. Therefore, there would be no impact to scenic resources within a State-designated scenic highway.

### **Mitigation Measures**

No mitigation is required because this impact would be less than significant.

**Threshold 3:** Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

**Impact AES-3 THE PROJECT WOULD ALTER THE VISUAL CHARACTER OF PUBLIC VIEWS OF THE SITE AND ITS SURROUNDINGS. COMPLIANCE WITH LUDC ORDINANCES THAT GOVERN DESIGN AND DEVELOPMENT STANDARDS FOR NEW STRUCTURAL DEVELOPMENT IN THE AG-II ZONE WOULD ENSURE THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The project would introduce a new 450,000-square-foot, 57.4-foot tall structure with paved parking areas and supporting infrastructure extending to the edges of the 40-acre project site. The project site is currently under agricultural cultivation and provides open views to the hillsides and ridgelines that frame the Santa Maria Valley. The project would alter to the existing visual character of the project site and would change the character of public views available through the site from adjacent roadways.

The conceptual illustrations provided in Section 2, Project Description, show views of the proposed structural development from U.S. 101 (refer to Figure 2-4, View 1) and Betteravia Road (refer to Figure 2-4, View 2). For non-residential development on parcels zoned AG-II, the LUDC does not limit the height of structures. As discussed in Impact AES-1, the project is visually consistent with other agricultural processing facilities in the vicinity of the project site and would not obscure designated scenic views across the agricultural lands from area roadways.

The topography of the project site is generally flat, with an average slope of less than two percent. Limited temporary grading and excavation would be required to construct foundations and storm water and processing water retention infrastructure. However, project grading would not change the final site elevation or slope.

The County's Comprehensive Plan does not identify the project site as an important visual resource, although public views in the vicinity of the site feature expansive views of the agricultural plain common in the rural Santa Maria Valley. The project would change the visual character of the project site, but the existence of similar agricultural processing facilities in the project site vicinity results in an expectation on the part of viewers that agricultural supporting facilities occur alongside row crop cultivation in the vicinity. Therefore, the overall impact to the surrounding landscape would be limited.

The final design of the proposed structure and on-site landscaping would be subject to design review and applicable LUDC requirements (e.g., requirements to use colors and exterior finishes that would minimize the effects of a large development on the landscape (LUDC Section 35.21.050 [4b])). Compliance with applicable LUDC requirements would ensure the project would be visually compatible with nearby structures and the surrounding agricultural landscape. Therefore, this impact would be adverse, but less than significant.

## Mitigation Measures

No mitigation is required because this impact would be less than significant.

**Threshold 4:** Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

**Impact AES-4 THE PROJECT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE. COMPLIANCE WITH LUDC REQUIREMENTS FOR OUTDOOR LIGHTING (SECTION 35.30.120) WOULD LIMIT SPILLOVER ONTO ADJACENT PROPERTIES AND MINIMIZE LIGHT AND GLARE INTERFERENCE TO TRAFFIC. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The project would introduce new sources of light from exterior parking lot and building security lighting. Some light would come from windows in multi-story buildings, where lights may be illuminated at night or in the early morning. Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the project site early in the morning and at night. All proposed lighting would be required to comply with LUDC 35.30.120, Outdoor Lighting, which requires that exterior lighting be shielded and directed downward so it does not interfere with vehicular traffic on any portion of a street or spill onto adjacent properties. The LUDC also specifies materials and types of lights that are approved and/or prohibited. Submittal of a lighting plan would be required for the project consistent with applicable LUDC requirements as part of the development permit process and evidence of compliance presented to receive final approval.

The project would introduce new sources of glare in the form of focused, intense light from sunlight reflecting on windows and light-colored exterior surfaces, parked car windows, or truck windshields when vehicles are backed up to loading docks. The administrative offices are the only part of the proposed structure that includes windows (refer to Figure 2-4, View 2), reducing the potential for glare impacts. The administrative offices would face Betteravia Road, but the setback of the building from the roadway would limit direct visibility of building windows to drivers. A portion of the project's proposed parking would occur near Betteravia Road, but the majority of proposed parking would be further from Betteravia Road, with a portion – including seasonal parking – being located behind the proposed structure. There is no adjacent residential development, and few pedestrians or bicyclists use Betteravia Road as a place of travel. Because adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. In addition, the project would be subject to design review by NBAR and would be required to be consistent with applicable LUDC ordinances that govern the placement and luminosity of building safety lighting, window treatments, and exterior finishes. Overall, potential impacts associated with light and glare would be less than significant.

## Mitigation Measures

No mitigation is required because this impact would be less than significant.

### c. Cumulative Impacts

The cumulative setting for potential aesthetics and visual quality impacts is in the northern portion of Santa Barbara County. Cumulative development includes development associated with buildout of the County's General Plan in the northern portion of the County and adjacent incorporated city general plans, as well as foreseeable future projects from Table 3-1 in Chapter 3, Environmental Setting, that could have a direct connection to the visual environment of the proposed project.

**Arctic Cold Agricultural Processor and Freezer Project**

As discussed under the impact analysis above, the project's direct and indirect impacts on aesthetic and visual resources would be less than significant because the proposed development would be subject to design review as stipulated by the LUDC. Other development in northern Santa Barbara County would be required to adhere to applicable zoning and development regulations and Comprehensive Plan policies that mitigate aesthetic and visual resource impacts.

Cumulative development would alter the visual character of agricultural areas in northern Santa Barbara County as land uses change from cultivated agricultural fields to a mix of cultivated fields and other types of uses supporting agricultural development. Betteravia Road is not designated as a scenic resource, nor as containing important visual features, either natural or human-made, in need of protection. All planned development in northern Santa Barbara County would be required to adhere to applicable zoning and development regulations, Comprehensive Plan policies, and design review to minimize potential impacts to visual resources. With adherence to applicable County review requirements, cumulative impacts related to aesthetics would be less than significant and the proposed project's contribution to potentially significant cumulative impacts related to visual quality would not be cumulatively considerable.

The closest designated state scenic highway is SR 1 between U.S. 101 at Las Cruces and SR 246 near Lompoc, which is located approximately 20 miles southwest of the project site. While cumulative development in northern Santa Barbara County may affect visual resources near scenic highways, the project would not be visible from the designated state scenic highway.

Cumulative development would contribute to an increase in light and glare throughout northern Santa Barbara County, and cumulative development in rural areas could result in a significant increase in light. The Santa Barbara County LUDC includes specific requirements related to light and glare, developed to minimize lighting and glare impacts. All projects are required to adhere to applicable zoning and development regulations, Comprehensive Plan and LUDC policies, and design review to reduce lighting and glare effects. In addition, cumulative projects listed in Table 3-1 are not located in close enough proximity to the project site such that substantial cumulative light and glare impacts would be expected. With adherence to applicable zoning and development regulations and Comprehensive Plan and LUDC policies, cumulative light and glare impacts in northern Santa Barbara County would be less than significant and the proposed project's contribution to potentially significant cumulative light and glare impacts would not be cumulatively considerable.

## 4.2 Agricultural Resources

The analysis in this section is based partially on the Agricultural Viability Screening Analysis prepared for the project by Rural Planning Services in May 2020 (Appendix B).

### 4.2.1 Environmental Setting

#### a. Regional Agricultural Resources

In 2019, agriculture was the largest industry in Santa Barbara County by revenue (Santa Barbara County 2019a). Table 4.2-1 summarizes agricultural productivity by crop type in Santa Barbara County for 2019, including harvested acreage and total gross values.

**Table 4.2-1 Santa Barbara County Agricultural Summary**

Crop Types <sup>1</sup>	Harvested Area	Total Gross Value
Vegetable Crops	59,057 acres	\$601,057,330
Fruit and Nut Crops	18,195 acres	\$686,759,763
Wine Grapes	14,927 acres	\$106,078,716
Cut Flower & Nursery Products	1,688 acres/ 11,613,478 greenhouse square feet	\$149,214,974
Field & Seed Crops	581,522 acres	\$23,997,420
Livestock & Animal Production	n/a	\$30,785,856
Apiary	n/a	\$2,252,425
<b>Total</b>	<b>675,389 acres/ 11,613,478 greenhouse square feet</b>	<b>\$1,600,146,484</b>

1. The Santa Barbara County Code of Ordinances has been amended to allow commercial cultivation of cannabis in zone type AG-I and AG-II.

Source: Santa Barbara County 2019

Rising land values and cost of inputs (water, fuel, fertilizer, etc.) have contributed to an increase in the conversion of agricultural land to non-agricultural uses throughout California. Rising land costs have also resulted in the intensification of agricultural land uses, whereby lower value products are replaced by high-value crops (e.g., grazing or dry farming replaced with row crops, orchards, or vineyards). Between 1984 and 2012, nearly 1.4 million acres of agricultural land in California were converted to non-agricultural purposes. Irrigated farmland in California decreased by more 119,970 net acres between 2010 and 2016 (California Department of Conservation 2014, 2015, and 2016).

#### b. Important Farmland

The Department of Conservation (DOC) Division of Land Resource Protection implements the Farmland Mapping and Monitoring Program (FMMP), which identifies the suitability of land for agricultural production. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of Important Farmlands and consistent and impartial data to decision-makers for use in assessing status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local General Plan actions, urban

needs, changing economic conditions, proximity to market, and other factors, which may be taken into consideration when government considers agricultural land use policies. The FMMP produces Important Farmland Maps, which depict resource quality (soils), irrigation status, and land use information.

The DOC divides land into seven general categories, with Important Farmland comprising the following four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The remaining three FMMP categories include Grazing Lands, Urban and Built-up Land, and Other Lands. The best quality land is Prime Farmland.

Figure 4.2-1 shows the mapped FMMP designations on the project site. As shown, the project site consists of Prime Farmland and Unique Farmland, with Urban and Built-up Land located across Betteravia Road to the north. The remaining FMMP designations do not occur on the project site.

### **c. On-Site and Neighboring Agricultural Resources**

The project site is 40 acres on the northeast corner of the approximately 109-acre subject property (herein referred to as “subject property” or “property”). The subject property is comprised of two parcels: APNs 128-097-0001 and 128-097-002. The parcels are zoned AG-II (Agricultural II) with a corresponding zoning map symbol of AG-II-40 and are not under an Agricultural Preserve (Williamson Act) contract. The subject property is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). The subject property has been leveled to provide for agricultural production.

The subject property is surrounded in all directions by agricultural uses, including Central City Cooling and row crops located across Betteravia Road to the north and row crops to the east, south, and west. The properties to the north, south, and east are zoned AG-II-40. The property to the west is zoned AG-II-100.

### **d. Soil Quality**

The Natural Resource Conservation Service (NRCS) has developed a land capability classification system to describe soils types, their physical characteristics and limitations, and their suitability for agriculture and other uses. The NRCS groups soils according to their suitability for most kinds of field crops. The capability class is designated by Roman numerals I through VIII. The numbers indicate progressively greater limitations and narrower choices for practical use as follows:

- **Classes I and II** – Soils with few limitations that restrict their use for agriculture are placed in Capability Classes I and II and are considered “prime agricultural soils” because almost all crops can be grown successfully on these soils.
- **Class III and IV** – Soils with agricultural limitations, which would affect management or choice of crop, are placed in Capability Classes III and IV either because fewer crops can be grown on these soils or special conservation and production measures are required.
- **Class V** – Soils with little or no hazard of erosion but have other limitations, impractical to remove, that limit their use to pasture, range, forestland, or wildlife food and cover. There are no soils of Class V in the County.
- **Class VI and VII** – Soils that fall into these classes are suited primarily for rangeland.
- **Class VIII** – Soils and landforms that are unsuitable for agricultural use are placed in Class VIII.

Figure 4.2-1 Farmland Mapping and Monitoring Program Map



Imagery provided by Microsoft Bing and its licensors © 2021.  
Farmland data provided by CA Department of Conservation, 2016.

Fig 4.2-1 FMM



Figure 4.7-1 in Section 4.7, *Geology and Soils*, shows the soils underlying the project site. Table 4.2-2 shows the approximate area of each of the soils underlying the project site as well as the capability classifications of these soils (only the irrigated capability class is shown). Soils that meet the criteria for Class I or II are considered prime agricultural soils, if irrigated, and are shown in bold.

**Table 4.2-2 Land Capability Class of Soils on the Project Site**

Name	Map Name	Land Capability Class	Acres on the Project Site
Betteravia loamy sand, 0-2 % slopes	BmA	III	27
Pleasanton sandy loam, 0-2 % slopes	PnA	I	13
<b>Total</b>			<b>40</b>

Note: Areas are approximate based on map data and total may vary slightly from total acreage of the project site.  
 Soils that meet the criteria for Class I or II are considered prime agricultural soils, if irrigated, and are shown in **bold**.

As shown in Table 4.2-2, the project site includes approximately 27 acres of Class III soils and 13 acres of Class I soils. The predominant soil on the project site is Betteravia loamy sand (Class III).

Table 4.2-3 shows the soils underlying the entire subject property. As shown in Table 4.2-3, the subject property includes approximately 15.5 acres of Class IV soils, 73.5 acres of Class III soils, and 19.8 acres of Class I soils. The predominant soil on the project site is Betteravia loamy sand (Class III).

**Table 4.2-3 Land Capability Class of Soils on the Subject Property**

Name	Map Name	Land Capability Class	Acres on the Subject Property
Betteravia loamy sand, 0-2 % slopes	BmA	III	73.5
Pleasanton sandy loam, 0-2 % slopes	PnA	I	19.8
Oceano Sand	OcD	IV	10.2
Oceano sand, severely eroded	OcD3	IV	5.3
<b>Total</b>			<b>108.8</b>

Note: Soils that meet the criteria for Class I or II are considered prime agricultural soils, if irrigated, and are shown in **bold**.  
 Source: Rural Planning Services, May 2020 (Appendix B).

## 4.2.2 Regulatory Setting

### a. State Regulations

#### Land Conservation Act

The California Land Conservation Act of 1965, also known as the Williamson Act (California Administrative Code Section 51200 et seq.), creates a legal arrangement whereby private landowners contract with local governments to voluntarily restrict land to agricultural and open space uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year.

## **b. Local Regulations**

### **Agricultural Nuisances and Consumer Information Ordinance**

Chapter 3, Article V, Section 3-23 of the County Code is the County’s “Right-to-Farm” Ordinance. The purpose of the ordinance is to protect agricultural land uses on land designated for agriculture from conflicts with non-agricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. Under this ordinance, no agricultural activity, operation or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, is to be considered a public or private nuisance, due to any changed condition in or about the locality, after the same has been in operation for more than three years if it was not a nuisance at the time it began.

The Right to Farm Ordinance also requires purchasers and residents of property adjacent to or near agricultural operations be advised of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust and chemicals that may accompany agricultural operations so that such purchasers and residents will understand the inconveniences that accompany living adjacent to agriculture and are prepared to accept such problems as the natural result of living in or near agricultural areas.

### **Ordinance 4851 Agricultural Buffer Ordinance**

The Agricultural Buffer Ordinance (Section 35.30.025 of the Land Use and Development Code [LUDC], County of Santa Barbara 2019), adopted in 2013 and updated in 2019, implements Comprehensive Plan policies by establishing development standards between agricultural uses and new non-agricultural development and uses in inland portions of the County. Buffers are used to minimize potential conflicts between agricultural and adjacent land uses that result from noise, dust, light, and odor incidental to normal agricultural operations as well as potential conflicts originating from residential and other non-agricultural uses such as domestic pets, insect pests, and invasive weeds. The agricultural buffer width can range from 100 to 400 feet depending on the type of agriculture and proposed non-agricultural use or development. The buffer is required to be located on the lot which contains the non-agricultural project, adjacent to the common lot line between the project site and the adjacent agricultural lot.

This ordinance applies to inland areas of the County when there is a discretionary application for non-agricultural development which: (1) is located in an Urban or Inner Rural Area, in an existing developed rural neighborhood (EDRN), or located on property zoned industrial that is located in the Rural Areas, and (2) is located immediately adjacent to agriculturally zoned land that is located in a Rural Area. The ordinance does not apply to single-family dwellings.

### **County of Santa Barbara Environmental Thresholds and Guidelines Manual**

The Agricultural Resource Guidelines in the County’s Environmental Thresholds and Guidelines Manual include a weighted point allocation system (“weighted point system” or WPS) to assign values to characteristics of a site’s agricultural productivity. The WPS is a preliminary screening tool, which examines a site’s agricultural suitability and productivity to determine whether the project’s impact on loss or impairment of agricultural resources would be a potentially significant impact. The WPS assigns relative values to characteristics of a site’s agricultural productivity (e.g., soil type, water supply, parcel size). The Environmental Thresholds and Guidelines Manual states:

“As a general guideline, an agricultural parcel of land should be considered to be viable if it is of sufficient size and capability to support an agricultural enterprise independent of any other parcel. To qualify as agriculturally viable, the area of land in question need only be of sufficient size and/or productive capability to be economically attractive to an agricultural lessee. This productivity standard should take into consideration the cultural practices and leasehold production units in the area, as well as soil type and water availability.”

The WPS is further described as it relates to the project in Section 4.2.3(a), Methodology and Significance Thresholds.

## **Comprehensive Plan Goals and Policies**

The County Comprehensive Plan includes several elements which contain goals and policies relevant to agricultural resources. These elements are discussed as follows:

### *Agricultural Element*

The Agricultural Element contains goals encouraging protection and enhancement of agricultural resources. Goals I and II discourage incompatible uses and adverse urban influences, promote freedom of agricultural methods, and encourage agricultural land improvement programs. Goal III calls for the preservation of remaining agricultural lands by discouraging expansion of urban uses into the Rural Area. Goal IV recognizes that agriculture can enhance and protect natural resources and encourages resource protection techniques such as range improvements, erosion control and fire reduction programs, and the prevention of grading and brush clearing on steep slopes and hillsides. Goals V and VI allow for supporting agricultural uses and installations as well as access roads compatible with agricultural machinery. The Comprehensive Plan contains various policies that support Goals I through VI. For example, Policy III.A states that urban expansion into active agricultural lands outside of urban limits is to be discouraged so long as infill development is available.

### *Environmental Resource Management Element*

The Environmental Resource Management Element states that existing croplands on prime soils should be preserved. Agricultural lands on less than prime soil should be preserved when possible. Under Category A, urbanization should be prohibited where existing croplands have a high agricultural suitability rating (within study areas), a Class I or II soil capability classification, or where agricultural preserves are subject to Williamson Act agreements. Under Category B, urbanization should be prohibited except where existing croplands have a moderate or low agricultural suitability rating (in I in the Urban Area), a Class III or IV soil capability classification, or with lands highly suitable for expansion of cultivated agriculture. It is noted that agricultural preserves, although not subject to environmental constraints, are included in Category A. The reason is that in entering into Williamson Act agreements, the County has made a legal commitment that the land will remain in agricultural use for a minimum of 10 years, subject to automatic annual renewal. As shown in Table 4.2-2, approximately 13 acres on the project site include Class I soils and would fall under Category A.

### *Land Use Element*

The Land Use Element also contains goals and policies pertaining to agricultural resources. This element states that “In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Land with both prime and non-prime soil shall be reserved for agricultural uses.”

## 4.2.3 Impact Analysis

### **a. Methodology and Significance Thresholds**

#### **Methodology**

The County's Environmental Thresholds and Guidelines Manual WPS provides a preliminary screening of a project's agricultural impacts. The WPS is weighted toward physical environmental resources rather than economics. This emphasis is in keeping with CEQA's emphasis on physical environmental impacts (State CEQA Guidelines Section 15131). The WPS assigns values to characteristics of a property's agricultural productivity and suitability to determine the potential agricultural viability of an existing property and whether a change to the property would impact the property's ability to support a self-sustaining agricultural operation as required in the Agricultural Element. The analysis compares the agricultural productivity and suitability of the entire subject property with and without the proposed project. Factors included in the analysis are: parcel size, soil classification, water availability, agricultural suitability, existing and historic land use, comprehensive plan designation, adjacent land uses, agricultural preserve potential, and combined farming operations. The assignment of 60 or more points indicates an agriculturally viable property. For agriculturally viable properties (with a point total of 60 or more), the following types of projects are considered to have a potentially significant impact:

- A division of land (including Parcel and Final Maps, etc.) which is currently considered viable but would result in parcels which would not be considered viable using the weighting system.
- A Development Plan, Conditional Use Permit, or other discretionary act which would result in the conversion from agricultural use of a parcel qualifying as viable using the weighting system.
- Discretionary projects which may result in substantial disruption of surrounding agricultural operations.

In May 2020, Rural Planning Services prepared an Agricultural Viability Screening Analysis to evaluate the effect of the project on the agricultural viability of the subject parcels (Appendix B). The acreage of analysis is based on the net acreage of both parcels on the subject property as this is the acreage under production. The Agricultural Viability Screening Analysis describes the existing soil characteristics on the parcels and the project site, the current/historic use of the parcels, and the effect of the proposed project on the agricultural viability of the parcels using the County's WPS.

#### **Significance Thresholds**

Appendix G of the CEQA Guidelines considers a project to have a significant impact on agricultural resources if the project would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract;
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g]);
4. Result in the loss of forest land or conversion of forest land to non-forest use; or

**Arctic Cold Agricultural Processor and Freezer Project**

5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

The project site does not contain any forest land, timberland, or timberland zoned Timberland Production. Therefore, the project would not result in any impacts to forest or timberland resources. Therefore, the project would not result in impacts to forest land or timberland resources, and Checklist Questions 3 and 4 are not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a discussion of Checklist Questions 3 and 4.

Based on the County Environmental Thresholds and Guidelines Manual, agricultural resource impacts would be considered significant if the project:

- Results in the conversion of prime agricultural land to non-agricultural use, impairment of agricultural land productivity (whether prime or non-prime), or conflict with agricultural preserve programs; or
- Results in any effect [potentially significant adverse effect] upon any unique or other farmland of State or Local Importance.

For the first County threshold, the WPS (described in under Methodology, above) is used to perform a preliminary screening of a project's agricultural impacts. For the second threshold, the FMMP Important Farmlands Map is used to evaluate the impact.

**b. Project Impacts and Mitigation Measures**

<p><b>Threshold 1:</b> Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p> <p><b>Threshold 5:</b> Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?</p>
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**Impact AG-1 THE PROJECT WOULD RESULT IN THE LOSS OF FMMP-DESIGNATED PRIME FARMLAND AND UNIQUE FARMLAND FOR AGRICULTURAL PRODUCTION. HOWEVER, THE PROJECT WOULD NOT SIGNIFICANTLY IMPAIR THE LONG-TERM AGRICULTURAL SUITABILITY AND PRODUCTIVITY OF THE SUBJECT PROPERTY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The project would result in the direct conversion of approximately 40 acres of FMMP-designated Prime Farmland and Unique Farmland on the approximately 109-acre subject property to a processor and freezer facility. Development of the project would result in the loss of prime agricultural soils for agricultural production. However, the proposed new processor and freezer facility is intended to support agricultural use for ongoing agricultural operations on the subject property and in the project site vicinity.

As described in Section 4.2.3(a), Methodology and Significance Thresholds, potential viability of the subject property as a result of this conversation is evaluated using the County's WPS, which assigns values to characteristics of a site's agricultural productivity and suitability to determine the potential agriculturally viability of an existing property and whether a change to the property would impact the property's ability to support a self-sustaining agricultural operation as required in the Agricultural Element. The following discussion includes an evaluation of the existing property (without the

proposed project) and the property with the proposed project using the WPS, and a comparison of the scores to determine whether the project would result in an impact to the agricultural viability of the property.

### WPS Allocation for Existing Property

1. **Parcel Size.** The existing property was assigned 11 out of 12 possible points for a property between 100-500 acres. Points were allocated based on the combined parcels that comprise the subject property being slightly over 100 acres.
2. **Soil Classification.** Potential points range from 6 to 15 points due to the variability of soils on the subject property in Classes I-IV. Table 4.2-4 shows the proportions of the existing property supporting Class I, Class III, and Class IV soils. The majority of the property supports Class III-IV soils, with a substantial portion supporting Class I soils. As a result, the property was proportionally assigned 8 out of 15 possible points.

**Table 4.2-4 Existing Property Soil Classification Point Score**

Soil Type	Soil Class	Existing Property Acreage	Percent of Total Acreage	WPS Soil Classification Score
PnA	I	19.8 acres	18.2%	
<b>Class I Subtotal</b>		<b>19.8 acres</b>	<b>18.2%</b>	<b>15</b>
BmA	III	73.5 acres	67.6%	
<b>Class III Subtotal</b>		<b>73.5 acres</b>	<b>67.6%</b>	<b>6</b>
OcD	IV	10.2 acres	9.4%	
OcD3	IV	5.3 acres	4.9%	
<b>Class IV Subtotal</b>		<b>15.5 acres</b>	<b>14.2%</b>	<b>6</b>
<b>Average</b>		<b>108.8 acres</b>	<b>100.0%</b>	<b>8</b>

Source: Rural Planning Services, May 2020 (Appendix B).

1. **Water Availability.** The property maintains an active well for agricultural use. The existing property was assigned a maximum point value of 15, as there is a developed water source onsite.
2. **Agricultural Suitability.** Historic agriculture on the property has been crop production and grazing. Soils onsite are highly suited for rotational crops. The site was considered highly suitable for that agricultural use and was assigned the maximum score of 10.
3. **Existing and Historic Land Use.** The property has historically supported row crop production and oil development. Since oil development has ceased on the property and the wells have been abandoned, the existing property was assigned a maximum score of 5 to reflect current use of the site.
4. **Comprehensive Plan Designation.** The property was assigned the maximum score of 5 based on the existing A-II designation.
5. **Adjacent Land Uses.** The property vicinity includes both agricultural with some ranchette uses to the south. Adequate services are available, and no conflict exists between agricultural and

**Arctic Cold Agricultural Processor and Freezer Project**

ranchette uses in the property vicinity. The property includes the Mid Coast Cooling facility and is adjacent to the Central City Cooling facility to the north, which support agricultural production in the region. Cooler and agricultural processors are typically located near agricultural production to reduce delays in processing produce and minimize waste. The existing property was assigned a score of 10 which is the maximum for a surrounded operation with adequate services.

6. **Agricultural Preserve Potential.** The property is zoned AG-II-40 and could qualify for a prime agricultural preserve contract as the parcel size is over 40 acres and includes Class I acreage (19.8 acres). The property is not currently under an agricultural preserve contract. The existing property was assigned a score of 5 due to the potential to qualify for an agricultural preserve contract.
7. **Combined Farming Operations.** The property is not associated with a combined farming operation. Agricultural production on the property is separately operated but is a holding within an agricultural operation with other properties in the west Santa Maria Valley. The existing property was assigned a score of 3 since it is separately managed.

**WPS Allocation for Property with Proposed Project**

1. **Parcel Size.** The project would not change the property size or subdivide the existing parcels. Therefore, the property with the proposed project was assigned 11 points out of 12 possible points for being between 100 and 500 acres in size.
2. **Soil Classification.** Potential points range from 1 to 15 points due to the variability of soils onsite with the property with the proposed project receiving a lower score of 5 due to the loss of 40 acres of farmed lands. Table 4.2-5 shows the proportions of the property supporting Class I, Class III, and Class IV soils with the addition of the proposed project.

**Table 4.2-5 Property with Proposed Project Soil Classification Point Score**

Soil Type	Soil Class	Existing Property Acreage	Percent of Total Acreage	WPS Soil Classification Score
PnA	I	6.8 acres	6.3%	
<b>Class I Subtotal</b>		<b>6.8 acres</b>	<b>6.3%</b>	<b>15</b>
BmA	III	46.5 acres	42.7%	
<b>Class III Subtotal</b>		<b>46.5 acres</b>	<b>42.7%</b>	<b>6</b>
OcD	IV	10.2 acres	9.4%	
OcD	IV	5.3 acres	4.9%	
<b>Class IV Subtotal</b>		<b>15.5 acres</b>	<b>14.2%</b>	<b>6</b>
Urban and Built-Up Land		40.0 acres	36.8%	
<b>Urban and Built-Up Land Subtotal</b>		<b>40.0 acres</b>	<b>36.8%</b>	<b>1</b>
<b>Average</b>		<b>108.8 acres</b>	<b>100%</b>	<b>5</b>

Source: Rural Planning Services, May 2020 (Appendix B).

1. **Water Availability.** The property maintains an active well for potable and agricultural use. The project proposes to install a new permitted water system to serve the project. The property with the proposed project was assigned a maximum point value of 15, as it is demonstrated in the Ground Water Analysis and addenda prepared for the project March and October 2020 (Appendix I) that adequate water is available to serve the project. The existing well will continue to serve the continued crop production.
2. **Agricultural Suitability.** Historic agriculture on property has been crop production and grazing. Soils onsite are highly suited for rotational crops and agricultural production will continue on the remainder of the property after the project is completed. The site would remain highly suitable for agricultural use, and the proposed new processor and freezer facility is intended to support agricultural production. As a result, the agricultural suitability for the property with the proposed project was assigned the maximum score of 10.
3. **Existing and Historic Land Use.** The property will continue to support row crop production after the completion of the proposed project. The proposed new processor and freezer facility is intended to support agricultural production. The property with the proposed project was assigned a maximum score of 5 to reflect existing use of the site focusing on intensification of agriculture.
4. **Comprehensive Plan Designation.** The property was assigned the maximum score of 5 based on the existing A-II designation, which would not change with the proposed project.
5. **Adjacent Land Uses.** Adjacent uses would remain the same with the proposed project. The proposed new processor and freezer facility is intended to support existing agricultural production in the northern Santa Barbara County region. The property with the proposed project was assigned a score of 10 which is the maximum for a surrounded operation with adequate services.
6. **Agricultural Preserve Potential.** The project would retain the existing AG-II-40 zoning, and the property with the proposed project would still qualify for a prime agricultural preserve contract as the parcel size is over 40 acres and the property would still include Class I acreage (6.7 acres). The property with the proposed project was assigned a score of 5 due to the potential to qualify for an agricultural preserve contract.
7. **Combined Farming Operations.** The property is not associated with a combined farming operation. Agricultural production on the property is separately operated but is a holding within an agricultural operation with other properties in the west Santa Maria Valley. Existing row crops on the 40-acre portion of the subject property that would be removed from production would be shifted to other properties operated within the same holding. As a result, the property with the proposed project was assigned a score of 2 since it is separately managed.

## Results

The total WPS scores for the existing property and the property with the proposed project are shown in Table 4.2-6. The existing property was assigned a total score of 72 using the County's WPS, and the property with the proposed project was assigned a total score of 68. The scores indicate the existing property is an agriculturally viable property, and the property with the proposed project would remain agriculturally viable since both score over 60 points.



**Table 4.2-6 Weighted Points System Calculations for Existing and Proposed Project**

Criteria	Point Range	Existing Property Condition	Property with Proposed Project
Parcel Size	11-12 (100-500 Acres)	11	11
Soil Classification	5-15 (Class I-VII)	8	5
Water Availability	12-15 (Wells)	15	15
Agricultural Suitability	8-10 (Highly Suited)	10	10
Existing & Historic Land Use	5 (Active)	5	5
Comprehensive Plan Designation	5 (A-II)	5	5
Adjacent Land Uses	9-10 (Adjacent Ag Uses)	10	10
Agricultural Preserve Potential	1-5 (Qualify)	5	5
Combined Farming Operations	0-4 (If Combined with Other Operations)	3	2
<b>Total</b>	<b>57-83</b>	<b>72</b>	<b>68</b>

Source: Rural Planning Services, May 2020 (Appendix B).

Section 4.11, Land Use and Planning, includes a discussion of the project’s consistency with the applicable policies and development standards in the County of Santa Barbara’s Comprehensive Plan. Appendix J includes an evaluation of the project’s consistency with specific policies of the Comprehensive Plan, including applicable policies in the Agricultural Element. The project would not conflict with any Comprehensive Plan Agricultural Element policy. Therefore, the project would not significantly impair the long-term agricultural suitability and productivity of the subject property. Impacts to agricultural resources would be less than significant.

**Mitigation Measures**

No mitigation is required because these impacts would be less than significant.

**Threshold 2:** Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

**Impact AG-2 THE PROJECT WOULD NOT CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT OR OTHER AGRICULTURAL PRESERVE CONTRACT, AND WOULD NOT INVOLVE ANY OTHER CHANGES THAT WOULD CONVERT FARMLAND TO NON-AGRICULTURAL USE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

As shown in Figure 4.2-1, the project site is designated as Prime Farmland and Unique Farmland under the FMMP. The project site is currently used for row crop cultivation. The project site is not under an Agricultural Preserve (Williamson Act) contract. The properties immediately south, east, and west of the project site are designated as Prime Farmland and Unique Farmland under the FMMP, and the property north of the project site across Betteravia Road is designated Prime Farmland and Urban and Built-Up Land at the location of the Central City Cooling facility. The properties surrounding the project site are all zoned for agricultural use (AG-II). The nearest residences to the project site are located approximately 0.5 mile to the southeast of the project site, and approximately 0.5 mile northwest of the project site.

Section 4.11, Land Use and Planning, includes a discussion of the project's consistency with the applicable policies and development standards in the County of Santa Barbara's Comprehensive Plan. Appendix J includes an evaluation of the project's consistency with specific policies of the Comprehensive Plan, including applicable policies in the Agricultural Element. The project would not conflict with any Comprehensive Plan Agricultural Element policy. The project site would remain zoned for agricultural use (AG-II) and the proposed new processor and freezer facility would be a supporting agricultural use for ongoing agricultural operations on the subject property and in the project site vicinity. Therefore, the project would not conflict with existing zoning for agricultural use, a Williamson Act, or other agricultural preserve contract. Therefore, this impact would be less than significant.

### **Mitigation Measures**

No mitigation is required because this impact would be less than significant.

### **c. Cumulative Impacts**

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines* Section 15065[a][3]). The geographic setting for potential cumulative impacts to agricultural resources is the northern portion of Santa Barbara County. Other cumulative developments considered in this analysis that could contribute to cumulative impacts to agricultural resources are listed in Table 3-1 in Chapter 3, Environmental Setting, of this EIR.

Cumulative development in the northern portion of Santa Barbara County would increase the incremental loss of prime and unique agricultural land in the County. Implementation of applicable policies and development standards in the Comprehensive Plan related to agricultural resources and compliance with applicable Santa Barbara County policies would minimize the incremental loss of prime and unique farmland but would not eliminate this cumulative impact to agricultural resources. As discussed in Impact AG-1, the project would result in a loss of FMMP-designated Prime Farmland and Unique Farmland. As described above, the proposed project would not significantly impair the long-term agricultural suitability and productivity of the subject property, resulting in a less than significant project-level impact. The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California. In the context of northern Santa Barbara County, the project is intended to support historic crop production and agricultural productivity in the region by providing a supporting use for existing regional agricultural operations. The project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. Consistency with this Land Use code requirement would ensure the proportion of produce coming into the processor facility from locations outside of a 25-mile radius would be relatively small. The typical local peak harvest period would be May through August. The portion of produce coming into the processor facility is planned to be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility. Accordingly, the project would not contribute to the increased conversion of prime and unique agricultural lands. Therefore, the project's contribution to cumulative impacts to agricultural resources would not be cumulatively considerable.

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## 4.3 Air Quality

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The background information and analysis in this section is based partially on the Air Quality and Greenhouse Gas Analysis Memorandum prepared for the project by LSA Associates in January 2021 (Appendix C).

### 4.3.1 Environmental Setting

#### a. Climate and Topography

The project site is in the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura Counties. The 2019 Ozone Plan for Santa Barbara County describes the air quality setting for the county in detail, including the local climate and meteorology, current and projected air quality, and the regulatory framework for the management of air quality. The climate of the SCCAB is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cell in the northeastern Pacific. The Mediterranean climate of the region produces moderate average temperatures, although extreme temperatures can be reached in the winter and summer. The warmest months of the year are between June and September, and the coldest month of the year is January. The annual average maximum temperature is 69 degrees Fahrenheit (°F), while the annual average minimum temperature is 53°F. Rainfall is concentrated in the winter months.

#### b. Air Pollutants of Primary Concern

Pollutants may be emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere; these pollutants include carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter with a diameter of up to ten microns (PM<sub>10</sub>) and up to 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb).

Additionally, pollutants may be created indirectly through chemical reactions in the atmosphere. Ozone (O<sub>3</sub>) is created by atmospheric chemical and photochemical reactions between reactive organic compounds (ROC)<sup>1</sup> and nitrogen oxides (NO<sub>x</sub>). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

#### Ozone

O<sub>3</sub> is produced by a photochemical reaction (triggered by sunlight) between NO<sub>x</sub> and ROC. NO<sub>x</sub> are formed during the combustion of fuels, while ROC is formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. O<sub>3</sub> is a pungent, colorless, toxic gas with direct health effects on humans, including respiratory and eye irritation and possible changes in lung functions (United States Environmental Protection Agency [U.S. EPA] 2020a). Groups most

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<sup>1</sup> CARB defines ROC, VOC, and ROG similarly as, “any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions). CARB defines VOC and ROG similarly as, “any compound of carbon excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate,” with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions and the term ROC is used in this report. SBCAPCD uses the term ROC to denote organic precursors.

sensitive to ozone include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

## **Carbon Monoxide**

CO is a colorless, odorless, poisonous gas that is found in high concentrations only near its source. The major source of CO is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Carbon monoxide health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity, and impaired mental abilities (U.S. EPA 2020a).

## **Nitrogen Dioxide**

NO<sub>2</sub> is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NO<sub>x</sub>. Nitrogen dioxide is an acute irritant. A relationship between NO<sub>2</sub> and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Elevated levels of NO<sub>2</sub> can also cause respiratory irritation, impaired pulmonary function, and bronchitis (U.S. EPA 2020a). Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of PM<sub>10</sub> and acid rain.

## **Particulate Matter**

Suspended atmospheric PM<sub>10</sub> and PM<sub>2.5</sub> is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The characteristics, sources, and potential health effects associated with PM<sub>10</sub> and PM<sub>2.5</sub> can be different. Major man-made sources of PM<sub>10</sub> are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer PM<sub>2.5</sub> particulates are generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. PM<sub>2.5</sub> is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the PM<sub>2.5</sub> that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

## **Sulfur Dioxide**

SO<sub>2</sub> is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. When SO<sub>2</sub> oxidizes in the atmosphere, it forms sulfur trioxide (SO<sub>3</sub>). Collectively, these pollutants are referred to as sulfur oxides (SO<sub>x</sub>). In humid atmospheres, SO<sub>2</sub> can also form sulfuric acid mist, which can eventually react to produce sulfate particulates that can inhibit visibility. Combustion of high sulfur-content fuels is the major source, while chemical plants, sulfur recovery plants, and metal processing are minor contributors. At sufficiently high concentrations, SO<sub>2</sub> irritates the upper respiratory tract. At lower concentrations, when in conjunction with particulates, SO<sub>2</sub> appears to do still greater harm by injuring lung tissues. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. Sulfur dioxide

causes respiratory irritation, including wheezing, shortness of breath, and coughing (U.S. EPA 2020a). Long-term SO<sub>2</sub> exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

## **Lead**

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. The major sources of Pb emissions historically have been mobile and industrial sources. In the early 1970s, U.S. EPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The U.S. EPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades (U.S. EPA 2013). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest level of Pb in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases). Demolition of buildings containing lead-based paint is regulated by existing laws and regulations, including California Code of Regulations Title 17, Division 1, Chapter 8 and Senate Bill 460, to reduce or eliminate the risk to nearby receptors.

## **Toxic Air Contaminants**

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM, CARB 2011). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

### **c. Current Air Quality**

The Santa Barbara County Air Pollution Control District (SBCAPCD) operates a network of eleven air quality monitoring stations throughout the SCCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the California and federal standards. The nearest monitoring station to the project site is the Santa Maria 906 S Broadway station, located approximately 2.6 miles northwest of the project site. Table 4.3-1 indicates the number of days that each of the federal or state air quality standards have been exceeded at the Santa Maria 906 S Broadway monitoring station. As shown in Table 4.3-1, PM<sub>10</sub> concentrations exceeded the state PM<sub>10</sub> standard for 22 days in 2017, 13 days in 2018 and, 15 days in 2019. PM<sub>2.5</sub> concentrations exceeded the federal standard for one day in 2018.

**Table 4.3-1 Ambient Air Quality Data**

<b>Pollutant</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Ozone (ppm), 1- Hour	0.068	0.052	0.059
Number of days of state exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.12 ppm)	0	0	0
Ozone (ppm), 8-Hour Average <sup>1</sup>	0.063	0.048	0.052
Number of days of state and federal exceedances (>0.07 ppm)	0	0	0
NO <sub>2</sub> (ppm)	0.044	0.040	0.033
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
PM <sub>10</sub> (µg/m <sup>3</sup> ), Worst 24 Hours	104.6	62.3	132.5
Number of days of state exceedances (>50 µg/m <sup>3</sup> )	22	13	15
Number of days of federal exceedances (>150 µg/m <sup>3</sup> )	0	0	0
PM <sub>2.5</sub> (µg/m <sup>3</sup> ), Worst 24 Hours	19.9	40.4	14.7
Number of days of federal exceedances (>35 µg/m <sup>3</sup> )	0	1	0

Source: CARB 2021

#### **d. Sensitive Receptors**

The term “sensitive receptor” refers to a person in the population who is more susceptible to health effects due to exposure to an air contaminant than the population at large or to a land use that may reasonably be associated with such a person. Individuals most susceptible to respiratory distress include children under 14 and adults over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Land uses that may be reasonably be associated with such individuals include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities.

Sensitive receptors near the project site consist primarily of commercial and residential sites approximately 2,000 feet away from the proposed facility location; these include a residence to the south at 1520 Prell Road; residences to the southeast such as 1858 Prell Road and 1975 Prell Road; and a residence to the northeast at 1775 Rosemary Road.

### 4.3.2 Regulatory Setting

#### **a. Federal Regulations**

The Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation’s air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. EPA developed Ambient Air Quality Standards which represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) have been designated for the following criteria pollutants of primary concern: O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and Pb.

The U.S. EPA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to

adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. Table 4.3-2 lists the current federal standards for regulated pollutants.

**Table 4.3-2 Current Federal and State Ambient Air Quality Standards**

Pollutant	Federal Standard	California Standard
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 µg/m <sup>3</sup> (rolling 3-month avg) 1.5 µg/m <sup>3</sup> (calendar quarter)	1.5 µg/m <sup>3</sup> (30-day avg)
Particulate Matter (PM <sub>10</sub> )	150 µg/m <sup>3</sup> (24-hr avg)	50 µg/m <sup>3</sup> (24-hr avg) 20 µg/m <sup>3</sup> (annual avg)
Particulate Matter (PM <sub>2.5</sub> )	35 µg/m <sup>3</sup> (24-hr avg) 12 µg/m <sup>3</sup> (annual avg)	12 µg/m <sup>3</sup> (annual avg)
Sulfates	No Federal Standards	25 µg/m <sup>3</sup> (24-hr avg)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)

ppm= parts per million

µg/m<sup>3</sup> = micrograms per cubic meter

Source: CARB 2016

## b. State Regulations

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code (H&SC) §39000 et seq.). Under the CCAA, the State has developed the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS. Table 4.3-2 lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant, based on the comparison of measured data within the CAAQS.

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and state Clean Air Acts, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant.



To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas. Santa Barbara County is classified as a nonattainment area for the State PM<sub>10</sub> standards and is classified as in attainment (or unclassifiable/attainment) for all other State and federal standards.

### **c. Local Regulations**

#### **Santa Barbara County Air Pollution Control District**

SBCAPCD, the lead air quality regulatory agency for Santa Barbara County, maintains air quality comprehensive programs for planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The 2001 Clean Air Plan (CAP) was adopted as the County portion of the SIP, designed to meet and maintain clean air standards. The 2019 Ozone Plan (2019 Plan) is the ninth triennial update to the initial state Air Quality Attainment Plan adopted by the SBCAPCD Board of Directors in 1991 (other updates were done in 1994, 1998, 2001, 2004, 2007, 2010, 2013, and 2016). Each of the plan updates have implemented an “every feasible measure” strategy to ensure continued progress toward attainment of the state ozone standards (SBCAPCD 2019). SBCAPCD also inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal and state Clean Air Acts. SBCAPCD would be a responsible agency for the proposed boilers and any other regulated stationary sources of pollutant emissions.

SBCAPCD maintains a guidance document for assessing and mitigating air quality impacts under the California Environmental Quality Act (CEQA), which includes tools and methodologies to quantify air pollutant emissions and characterize impacts, and strategies to mitigate impacts (SBCAPCD 2017). SBCAPCD also adopted its Environmental Review Guidelines pursuant to CEQA, which contains procedures for environmental review, adopted thresholds of significance, time limits, fees, forms, and District-approved exemptions to CEQA review (SBCAPCD 2015).

### 4.3.3 Impact Analysis

#### **a. Methodology and Significance Thresholds**

##### **Methodology**

The Air Quality Analysis and Greenhouse Gas Analysis Memorandum for the proposed Arctic Cold Storage and Packaging Project was prepared by LSA Associates using methods and assumptions recommended in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (Appendix C) and peer reviewed by SBCAPCD and Rincon Consultants. Air pollutant emission estimates were developed using CalEEMod (version 2016.3.2). These estimates reflect information provided by the project applicant and regionally-specific default parameters for projects in Santa Barbara County. The trip generation rates calculated in the project Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) were used as inputs in CalEEMod. See Appendix C for a detailed discussion of methodology and modeling assumptions.

## Construction

Site preparation and project construction would involve grading, paving, and building activities. Construction-related effects on air quality from the project would be greatest during the site preparation phase due to the disturbance of soils. These activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM<sub>10</sub> emissions would vary from day to day, depending on the nature and magnitude of construction activity, local weather conditions, soil moisture, silt content of soil, and wind speed. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction of the project, emissions would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate.

The proposed would include 64,876 cubic yards of cut and 50,311 cubic yards of fill. Therefore, the project would result in approximately 14,565 cubic yards of net cut, which was included in CalEEMod. Other construction details were estimated using standard assumptions (e.g., construction fleet activities) from CalEEMod.

## Operation

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), off-road sources (e.g., forklifts), stationary sources (e.g., fire pumps), and boiler emissions related to the project.

Long-term operation emissions associated with the project were calculated using CalEEMod. The CalEEMod analysis assumed 449,248 square feet of “refrigerated warehouse-no rail” and a ~~496 space~~ approximately 200,000 square feet of parking lot area. In addition, total trip generation for the project was based on trip generation rates calculated in the project’s Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) and fleet mix obtained from CalEEMod (Appendix C). The project would generate approximately ~~1,380~~ 1,642 average daily trips, with ~~1,168~~ 1,246 employee trips and ~~212~~ 396 truck trips. ~~Trip lengths in CalEEMod were also revised based on the field truck/vans trip distribution percentage, estimated origin and designation, and the estimated average one-way trip length (LSA Associates 2021). Based on the total miles traveled and the field truck/vans trip distribution percentage, the average trip length was estimated to be 24.9 miles. Mobile source emissions were evaluated based on CARB’s 2017 EMFAC web database using vehicle class-specific emissions factors and vehicle miles traveled. Calculation details are shown in Appendix C.~~

Most of the equipment used for operation of the project would be electric driven. However, the project would utilize four propane forklifts and diesel fire pumps, which were also included in CalEEMod. The analysis assumes the 351 horsepower (hp) diesel fire pump would be used 2 hours per day and up to 50 hours per year for maintenance and testing, consistent with the default operation limits for SBCACD permitting. Where project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions. The project would not add carbon dioxide to any of the operations within the facility and would not use diesel generators.

The project would also utilize five boilers to heat water for pasteurizers and evaporators for pasteurized products and puree concentrates. The five boilers would include four 100 hp Miura low-NO<sub>x</sub> boilers and one 300 hp Miura low-NO<sub>x</sub> boiler. All five boilers would be fueled by natural gas and would have a low NO<sub>x</sub> rating as low as 9 parts per million. The four 100 hp Miura low-NO<sub>x</sub> boilers would each have a heat input rating of 3,939,000 British thermal units (BTU) and the 300 hp Miura low-NO<sub>x</sub> boiler would have a heat input rating of 11,544,000 BTU. The boilers would be used for 24 hours/6 days a week during the peak season (April through October) and 24 hours/5 days a week during the off-season (January through April). Emissions associated with the five boilers were calculated and added to the project operation emissions.

### **Thresholds of Significance**

Appendix G of the *State CEQA Guidelines* considers a project to have a significant impact related to air quality if the project would:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standards.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The project would not include any land uses known to produce odors. Therefore, the project would not result in odor impacts and odors (Checklist Question 4) are not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant, for a more detailed discussion on impacts to odors.

### *Construction Emissions Thresholds*

The County does not currently have quantitative thresholds of significance for short-term construction emissions. However, CEQA requires that the short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading be analyzed. SBCAPCD recommends that construction-related NO<sub>x</sub>, ROC, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from diesel and gasoline powered equipment, paving, and other activities, be quantified.

As the County Environmental Thresholds and Guidelines Manual does not establish a quantitative threshold of significance for short-term construction emissions, this analysis references SBCAPCD significance thresholds. According to the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*, SBCAPCD uses 25 tons per year for all pollutants except for CO as a guideline for determining the significance of construction impacts (SBCAPCD 2017).

Standard dust control measures must be implemented for any discretionary project involving earthmoving activities, regardless of size or duration. According to the SBCAPCD, proper implementation of these required measures reduces fugitive dust emissions to a level that is less than significant (SBCAPCD 2017). Therefore, all construction activity would be required to incorporate the SBCAPCD requirements pertaining to minimizing construction-related emissions and demolition of existing structures.

### Operational Emissions Thresholds

As described in SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents and in Environmental Review Guidelines* the Santa Barbara County's Environmental Thresholds and Guidelines Manual, a project would have a significant air quality effect on the environment if operation would:

- Emit (from all sources, both stationary and mobile) more than 240 55 pounds per day for ROC and or NO<sub>x</sub>, or more than 80 pounds per day for PM<sub>10</sub>.
- Emit more than 25 pounds per day of NO<sub>x</sub> or ROC from motor vehicle trips only.
- Exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk).

### b. Impact Analysis

**Threshold 1:** Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Impact AQ-1 THE PROJECT WOULD BE CONSISTENT WITH THE SBCAPCD 2019 OZONE PLAN AND ITS PROJECT ASSUMPTIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

To be consistent with the 2019 Ozone Plan, a project's direct and indirect emissions must be accounted for in the growth assumptions of the Ozone Plan and the project must be consistent with the policies in the Ozone Plan (SBCAPCD 2017). In addition, to be consistent with Ozone Plan, all projects involving earthmoving activities must implement the standard dust control measures per SBCAPCD's Rule 345.

The majority of land use-related criteria pollutant emissions are related to vehicle use, which are directly related to population because additional residents result in more vehicular use. Population accounted for in the 2019 Ozone Plan and SBCAG forecasts are also accounted for in the SBCAPCD emissions inventories. The project would provide a new cold storage/processing facility and would thereby support existing agricultural production in the area by providing support infrastructure. The project is consistent with the existing zoning, AG-II (Agricultural II). Therefore, the project would be within growth forecast assumptions used in the 2019 Ozone Plan and would not conflict with or obstruct the implementation of the applicable air quality plan.

### Mitigation Measures

This impact would be less than significant, and no mitigation measures are required.

**Threshold 2:** Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

**Impact AQ-2 PROPOSED DEVELOPMENT WOULD BE REQUIRED TO IMPLEMENT FUGITIVE DUST AND EQUIPMENT EXHAUST MEASURES WHICH WOULD REDUCE THE PROJECT'S ANNUAL MAXIMUM CONSTRUCTION EMISSIONS. IMPACTS ASSOCIATED WITH TEMPORARY CONSTRUCTION EMISSIONS WOULD BE LESS THAN SIGNIFICANT.**

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by site preparation, grading, hauling, and building activities. Following the

methodology discussed above, construction-related emissions were estimated using CalEEMod. Estimated maximum annual construction emissions are shown in Table 4.3-3.

**Table 4.3-3 Project Construction Emissions**

	Maximum Emissions (tons per year)					
	CO	NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Year 1	3.4	4.2	0.4	<0.1	0.5	0.3
Construction Year 2	0.5	0.4	5.3	<0.1	<0.1	<0.1
Significance Threshold <sup>1</sup>	25	25	25	25	25	25
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

<sup>1</sup>The County Environmental Thresholds and Guidelines Manual does not establish a quantitative threshold of significance for short-term construction emissions. SBCAPCD uses 25 tons per year for all pollutants except for CO as a guideline for determining the significance of construction impacts (SBCAPCD 2017).

Source: LSA Associates 2021 (Appendix C).

SBCAPCD has established standard measures for reducing fugitive dust emissions (PM<sub>10</sub> and PM<sub>2.5</sub>) and particulate emissions from diesel exhaust, which are required for all projects that would involve earth-moving activities. During construction, the project contractor would be required to implement the following SBCAPCD standard dust control and equipment exhaust measures:

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to grading/building permit issuance and/or map clearance.
- All portable diesel-powered construction equipment shall be registered with the state’s portable equipment registration program OR shall obtain an SBCAPCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-Use Off-Road Diesel Vehicles (Title 13, California Code of Regulations (CCR), §2449), the purpose of which is to reduce oxides of nitrogen (NO<sub>x</sub>), diesel particulate

matter (DPM), and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. Off-road heavy-duty trucks shall comply with the State Off-Road Regulation. For more information, see [www.arb.ca.gov/msprog/ordiesel/ordiesel.htm](http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm).

- Fleet owners of mobile construction equipment are subject to CARB Regulation for In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, §2025), the purpose of which is to reduce DPM, NO<sub>x</sub> and other criteria pollutants from in-use (on-road) diesel-fueled vehicles. On-road heavy-duty trucks shall comply with the State On-Road Regulation. For more information, see [www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm](http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm).
- All commercial off-road and on-road diesel vehicles are subject, respectively, to Title 13, CCR, §2449(d)(3) and §2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized.

As shown in Table 4.3-3, impacts associated with temporary construction emissions would be less than significant. Implementation of the standard measures listed above would further reduce temporary construction emissions.

### Mitigation Measures

This impact would be less than significant, and no mitigation measures are required.

**Threshold 2:** Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

**Impact AQ-3 PROJECT OPERATIONAL EMISSIONS WOULD EXCEED THE COUNTY'S SIGNIFICANCE THRESHOLDS FOR NO<sub>x</sub> EMISSIONS. IMPLEMENTATION OF REQUIRED MITIGATION WOULD REDUCE NO<sub>x</sub> EMISSIONS TO THE EXTENT FEASIBLE. HOWEVER, PROJECT-RELATED NO<sub>x</sub> EMISSIONS WOULD REMAIN ABOVE APPLICABLE NO<sub>x</sub> EMISSION THRESHOLDS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Project-related long-term air emissions would occur primarily from vehicle trips associated with the project (i.e., mobile source emissions) and boiler emissions. The project would use refrigerated trucks from other regions throughout California and Baja. Project-related long-term air emissions would also occur from the use of electricity and natural gas (i.e., energy source emissions), the use of landscape equipment and from the use of consumer products (i.e., area source emissions), the use of the forklifts (off-road emissions), the use of the fire pump system (i.e., stationary source emissions) and the use of the boilers. PM<sub>10</sub> emissions result from exhaust produced when a vehicle is running, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM<sub>10</sub> occurs when vehicle tires pulverize small rocks and pavement and the vehicle movement generate airborne dust. The contribution of tire and brake wear is small compared to the other sources of PM emissions. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Following the methodology discussed above, ~~construction-related~~ operational emissions were estimated using CalEEMod. Estimated maximum operational emissions are shown in Table 4.3-4.

**Table 4.3-4 Project Operational Emissions**

	Maximum Emissions (pounds per day)					
	CO	NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile Source Emissions	<del>77.3</del> <u>126.5</u>	<del>357.6</del> <u>652.9</u>	<del>23.3</del> <u>43.2</u>	<del>0.8</del> <u>1.1</u>	<del>10.5</del> <u>18.9</u>	<del>15.0</del> <u>22.7</u>
Energy Source Emissions	0.4	0.4	<0.1	<0.1	<0.1	<0.1
Area Source Emissions	0.1	<0.1	12.6	<0.1	<0.1	<0.1
Off-road Emissions	13.8	12.7	1.4	<0.1	0.8	0.8
Stationary Source Emissions	3.0	3.2	1.2	<0.1	0.2	0.2
Boiler Emissions	194.6	7.2	3.5	43.1	4.9	<0.1
<b>Total Project Operation Emissions</b>	<del>289.2</del> <b><u>338.4</u></b>	<del>391.1</del> <b><u>676.4</u></b>	<del>42.0</del> <b><u>61.9</u></b>	<del>9.8</del> <b><u>10.1</u></b>	<del>16.4</del> <b><u>24.8</u></b>	<del>16.0</del> <b><u>23.7</u></b>
Santa Barbara County Mobile Source Significance Threshold	N/A	25	25	N/A	N/A	N/A
<b>Mobile Source Threshold Exceeded?</b>	<b>N/A</b>	<b>Yes</b>	<del>No</del> <b><u>Yes</u></b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Santa Barbara County All Source Significance Threshold	N/A	<del>240</del> <u>55</u>	<del>55</del> <u>55</u>	N/A	80	N/A
<b>All Source Threshold Exceeded?</b>	<b>N/A</b>	<b>Yes</b>	<b><u>Yes</u></b>	<b>N/A</b>	<b>No</b>	<b>N/A</b>

Source: LSA Associates 2021 (Appendix C).

As shown in Table 4.3-4, mobile source emissions associated with the project would exceed the applicable Santa Barbara County threshold for mobile NO<sub>x</sub> and ROC emissions. The project's total emissions of ROC and NO<sub>x</sub> would exceed the Santa Barbara County threshold for ROC and NO<sub>x</sub> combined, primarily as a result of the project's high emissions of NO<sub>x</sub> and ROC from mobile sources.

## Mitigation Measures

### AQ-1 NO<sub>x</sub> and ROC Emissions Reduction Measures

The applicant shall implement the following NO<sub>x</sub> and ROC emission reduction measures:

- a. Provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- b. All loading/unloading docks and trailer spaces shall be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement decreases the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration shall be encouraged for operational fleets to the maximum extent feasible.
- c. All TRUs entering the project site shall be plug-in capable.
- d. All heavy-duty trucks entering or on the project site shall be model year 2014 or later to the maximum extent feasible. Operational fleets shall use zero-emission light and medium-duty

delivery trucks and vans to the maximum extent feasible. The applicant shall expedite a transition to zero-emission vehicles, with all operational fleets being fully zero-emission beginning in 2030.

- e. On-site TRU diesel engine runtime shall be limited to no longer than 15 minutes.
- f. Include rooftop solar panels to the maximum extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

**Plan Requirements and Timing.** The Conditional Use Permit shall require that the applicant report operational characteristics to Planning and Development staff annually, with the initial report due three months after initial project operation. Annual reports shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures € A through ≠ F are being implemented on an on-going basis.

If the project applicant applies for a stationary source air permit from the SBCAPCD, the applicant shall demonstrate to the satisfaction of Planning and Development staff that measures € A through ≠ F are incorporated into the air quality permit requirements. ~~Upon issuance of the air quality permit, implementation monitoring of these measures may be transferred to SBCAPCD staff to streamline enforcement.~~

**Monitoring.** Planning and Development compliance monitoring staff shall incorporate these NO<sub>x</sub> and ROC emission reduction measures into the project Conditional Use Permit. Prior to issuance of the Conditional Use Permit, the applicant shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures (a, b, and i) have been constructed.

### Significance After Mitigation

Implementation of Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> and ROC emissions to the extent feasible by providing infrastructure necessary to support zero-emission vehicles and equipment. The project can provide infrastructure to support zero-emission vehicles and equipment; however incoming produce would be transported by trucks owned by local growers and growers from other regions and Baja. The project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies as mitigation for the proposed project. Due to the project's limited control over other parties' truck fleets, the project could not feasibly reduce mobile source emissions by 90 percent, the amount required to reduce the project's NO<sub>x</sub> and ROC emissions below the applicable mobile source NO<sub>x</sub> and ROC threshold. In addition, the County does not have an established off-site mitigation program for ozone precursors, and therefore a feasible and enforceable mitigation measure for offset mitigation would not be possible. As a result, the potential impact of the project's operational emissions of NO<sub>x</sub> and ROC would be significant and unavoidable.

ROC and NO<sub>x</sub> emissions associated with the project would be regional in nature, meaning that the air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project; emissions are released in other areas of the SCCAB (i.e., vehicles traveling to the project site would release emissions along roadways throughout the SCCAB and not specifically on the project site). Although operational emissions exceed the Santa Barbara County's operational mobile significance threshold for NO<sub>x</sub> and ROC, it is speculative to estimate the concentration of ozone that would be created at or near the project site on a particular day or month of the year, or the specific human health impacts that may occur. Meteorology, the presence of sunlight and other complex chemical factors all combine to determine the ultimate concentrations and locations of ozone. This is especially true for the project, where most of the criteria pollutant emissions derive not from a single



“point source,” but from mobile sources (cars and trucks) driving to, from, and around the project site.

In addition, it is speculative to estimate the impact of the estimated NO<sub>x</sub> and ROC emissions on NAAQS attainment. As discussed above, the currently available tools are equipped to model the impact of all emission sources in the air basin on attainment. According to the SBCAPCD’s 2019 Ozone Plan, basin-wide emissions in 2012 were 71.6 tons per day for NO<sub>x</sub> emissions (SBCAPCD 2019). Running the photochemical grid model used for predicting ozone attainment with the emissions solely from project (which equates to less than one tenth of one percent for NO<sub>x</sub>) is not likely to yield pertinent information given the relatively small scale involved. It is not scientifically feasible at the time of drafting of this report to substantively connect this individual project’s air quality impacts to likely health consequences so that the public may make informed decisions regarding the costs and benefits of the project. Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> emissions to the extent feasible; however, for the reasons describe above the potential impact of the project’s operational emissions of NO<sub>x</sub> and ROC would remain significant and unavoidable.

**Threshold 3:** Would the project expose sensitive receptors to substantial pollutant concentrations?

**Impact AQ-4 NEITHER CONSTRUCTION NOR OPERATION OF THE PROJECT WOULD RESULT IN EMISSIONS THAT WOULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptors are located approximately 2,000 feet from the proposed facility location; these include a residence to the south at 1520 Prell Road; residences to the southeast such as 1858 Prell Road and 1975 Prell Road; and a residence to the northeast at 1775 Rosemary Road.

### **Construction**

Construction activities associated with the project would generate airborne particulates and fugitive dust, as well as a small quantity of pollutants associated with the use of construction equipment (e.g., diesel-fueled vehicles and equipment) on a short-term basis. However, construction contractors would be required to implement standard measures for reducing fugitive dust emissions including application of water to stabilize disturbed soil and stockpiles, minimizing disturbance area, reduced vehicle speeds over on the project site, and gravel pads at site entrances to prevent tracking dust directly onto paved roads. As discussed in Impact AQ-2, SBCAPCD has established standard measures for reducing fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and particulate emissions from diesel exhaust, which are required for all projects that would involve earth-moving activities. During construction, the project contractor would be required to implement the following recommended SBCAPCD standard dust control and equipment exhaust measures. As a result, the project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would also be less than significant.

### **Operational**

Once the project is constructed, the project would include diesel truck traffic associated with loading and unloading of products at the warehouse. However, idling of trucks would be limited by CARB’s In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. CARB provides analysis of distribution centers, including cold storage facilities, in the document Air Quality and Land

Use Handbook: A Community Health Perspective (CARB 2005). The document includes the recommendation that distribution centers should be located more than 1,000 feet from sensitive land uses. The closest sensitive receptors are located approximately 2,000 feet from the proposed facility location. Therefore, the siting of the project building is within CARB’s recommended distance and long-term operational emissions would not be expected to impact sensitive receptors.

Due to the potential of the diesel fire pump to emit toxic and hazardous air pollutants, an equipment-specific screening-level health risk assessment (HRA) was prepared using the SBCAPCD’s screening tool spreadsheet for diesel-fired internal combustion engines (DICE). The DICE Screening Tool provides an estimate of engine emission concentrations based on project location, meteorological data set, building downwash, engine size, distance from engine source to nearest resident and nearest worker, diesel PM emission factor, and permitted hours. As shown below in Table 4.3-5, health risks associated with the project would not exceed SBCAPCD’s thresholds.

**Table 4.3-5 Health Risk from Diesel Fire Pump to Nearest Receptor**

	<b>Carcinogenic Inhalation Health Risk in One Million<sup>1</sup></b>	<b>Chronic Inhalation Hazard Index<sup>2</sup></b>
Maximally Exposed Individual Resident	0.5	<0.1
Maximally Exposed Individual Worker	<del>0.3</del> 0.6	<0.1
SBCAPCD Significance Threshold	10.0	1.0
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>

<sup>1</sup> Represents the probability that an exposed individual will develop cancer (persons per million exposed).

<sup>2</sup> Hazard Index (HI) is a relative metric for the effect of substances on an organ or organ system. A hazard index of less than 1.0 will not likely result in health effects over lifetime exposure. A hazard index greater than 1.0 does not necessarily suggest adverse health effects are likely and is best described as indicating that there is potential for adverse irritation to an organ or organ system.

Source: LSA Associates 2021 (Appendix C).

The project’s role as a shipping facility would increase heavy truck traffic in the immediate project vicinity and along regional hauling routes. The State Office of Environmental Health Hazard Assessment (OEHHA) has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated.

Truck trips generated by the project would operate in two modes: stationary idling and moving on and off the site. The emissions from trucks while idling result in a much higher concentration of TACs compared to the emissions from moving trucks. This is due to the dispersion of emissions that occurs with distance and with travel of the vehicle. The project would not locate a new potential source of diesel truck traffic (distribution center) within 1,000 feet from the nearest sensitive receptors, consistent with the recommendations in the CARB Community Health Perspective (CARB 2005). Therefore, the project would not result in stationary idling emissions impacts at sensitive receptors. Based on the truck distribution percentage and estimated origin and designation, diesel exhaust associated with moving trucks at any one receptor location would occur for a limited duration, and would not result in long-term exposure of any receptor to a substantial concentration of DPM emissions. As such, the project would not expose sensitive receptors to substantial pollutant concentrations.

## **Mitigation Measures**

This impact would be less than significant, and no mitigation measures are required.

### **c. Cumulative Impacts**

Cumulative development in the northern part of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project. Cumulative development in Santa Maria and the surrounding area would increase criteria pollutant emissions in the SCCAB, which would contribute to the nonattainment status for the State PM<sub>10</sub> standards in the Santa Barbara County portion of the SCCAB. Because Santa Barbara County is currently in nonattainment for the State standard for PM<sub>10</sub>, cumulative air quality impacts are potentially significant.

Based on Santa Barbara County thresholds, a project would have a significant cumulative impact if it is inconsistent with the applicable adopted federal and state air quality plans (in this case, the 2019 Ozone Plan). As discussed in Impact AQ-1, the project is consistent with the 2019 Ozone Plan. However, as discussed in Impact AQ-3, project operational emissions would result in a cumulatively considerable increase of criteria pollutants due to high NO<sub>x</sub> emissions. Therefore, the project would contribute to cumulative impacts to air quality and mitigation would be required. Mitigation Measure AQ-1 would reduce the project's contribution to significant cumulative impacts to air quality. However, implementation of Mitigation Measure AQ-1 would still result in a significant and unavoidable impact to criteria pollutants pertaining to NO<sub>x</sub> emissions. Thus, the project would result in a cumulatively considerable contribution to air quality impacts.

## 4.4 Biological Resources

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This section describes existing conditions and regulatory setting for biological resources in the project area, and assesses potential impacts on biological resources that could result from implementation of the proposed project. The analysis of biological resources is based on a review of relevant literature and the results of reconnaissance-level and focused field surveys by qualified biologists. This analysis is based on the findings of a Jurisdictional Delineation Survey prepared by Rincon Consultants, Inc. in October 2020 and updated in October 2021 (Appendix D) and a desktop survey of special status plant species occurring in the vicinity of the project site and special status animal species occurring in the regional vicinity of the project site (Appendix E).

### 4.4.1 Environmental Setting

#### a. Vegetation Communities and Land Cover Types

The study area for biological resources is the Biological Study Area (BSA), which is defined as the project site (see definition of “project site” in Section 2.3), plus a 50-foot buffer. Vegetation communities within the BSA include barnyard grass/wild radish patches, California bulrush marsh, cattail marshes, smartweed patches, and ruderal. The remaining portions of the BSA that did not contain vegetation were mapped and described as developed and agriculture fields. Figure 4.4-1 depicts the identified vegetation communities and land cover types within the BSA.

#### **Barnyard Grass/Wild Radish Patches**

Vegetation within the western portion of the irrigation drainage is predominately non-native barnyard grass (*Echinochloa crus-galli*) and wild radish (*Raphanus sativus*, UPL) (Appendix D). The barnyard grass/wild radish patches do not correspond to *Brassica nigra* - *Centaurea (solstitialis, melitensis)* Herbaceous Alliance as the coverage of wild radish was not high enough. Vegetation becomes less dense within the drainage towards the west. Other species present within the vegetation community include cheeseweed (*Malva parviflora*, UPL). This vegetation community is predominately non-native species and is not considered sensitive.

#### **California Bulrush Marshes**

California bulrush marshes most closely correspond to *Schoenoplectus (acutus, californicus)* Herbaceous Alliance in MCV2 (Sawyer et al. 2009). This native herbaceous alliance is typically found in brackish to freshwater marshes; along stream shores, bars, and channels of river mouth estuaries; around ponds and lakes; in sloughs, swamps, and in roadside ditches between 0 to 8,202 feet (0 to 2,500 meters) in elevation. Soils are poorly aerated, with organic contents. Bulrush species contribute to at least 50 percent cover in the herbaceous layer (Sawyer et al. 2009, California Native Plant Society [CNPS] 2021). This vegetation community has a rarity ranking of G5S5, meaning this vegetation community is demonstrably secure statewide and globally due to its worldwide and statewide abundance, and is not considered sensitive (California Department of Fish and Wildlife [CDFW] 2020a).

Approximately 0.2 acres of California bulrush marshes are present in the BSA within the smartweed patches in the irrigation drainage along the northern and southeastern project site boundary. The California bulrush marshes and are concentrated stands of California bulrush (*Schoenoplectus*

*californicus*) (Figure 4.4-1). Other species present within the California bulrush marshes include tall cyperus (*Cyperus eragrostis*).

## Cattail Marshes

Cattail marshes most closely correspond to the *Typha* (*angustifolia*, *domingensis*, *latifolia*) Herbaceous Alliance in MCV2 (Sawyer et al. 2009). This native herbaceous alliance is typically found within semi-permanent flooded marshes or brackish marshes between 0 to 1,148 feet (0 to 350 meters) in elevation. Soils are typically clayey or silty. Cattail species contribute to at least 50 percent cover in the herbaceous layer (Sawyer et al. 2009, CNPS 2021). This vegetation community is ranked G5S5 and is not considered sensitive (CDFW 2020a). Approximately 0.002 acres of cattail marshes are present within the smartweed patches in the irrigation drainage at the northeast corner of the BSA. These marshes are small, concentrated stands of cattail (*Typha latifolia*).

## Smartweed Patches

The smartweed patch habitat most closely corresponds to the ~~*Polygonum lapathifolium* *Persicaria lapathifolia*~~ Herbaceous Alliance in ~~MCV2~~ (Sawyer et al. 2009). This native herbaceous alliance is typically found within marshes, regularly disturbed wet ponds, fields and stream terraces between 0 to 4,920 feet (0 to 1,500 meters) in elevation. Soils are typically clay-rich or silty. ~~Willow weed~~ Smartweed (~~*Polygonum lapathifolium* *Persicaria lapathifolia*~~) and/or cocklebur (*Xanthium strumarium*) or other knotweed species contribute to at least 50 percent cover in the herbaceous layer (Sawyer et al. 2009, CNPS 2021). This vegetation community is ranked G5S5 and is not considered sensitive (CDFW 2020a).

Smartweed patches are the dominate community within eastern portion of the irrigation drainage along the northern and eastern project site boundary, and totals approximately 1.07 acres in the BSA (Figure 4.4-1). Abundant species in this community within the irrigation drainage include ~~willow weed~~ (~~*Persicaria lapathifolia* [*Polygonum lapathifolium*]~~) smartweed, willowherb (*Epilobium ciliatum*), ~~jointed charlock~~ wild radish (*Raphanus sativus*, UPL), barnyard grass (~~*Echinochica crus-galli*~~), lamb's quarters (*Chenopodium alum*), and Bermuda grass (*Cynodon dactylon*).

## Ruderal

Ruderal vegetation is located along the northern project site boundary adjacent to the East Betteravia Road in disturbed areas and are continually mowed by the County for maintenance. There is a total of approximately ~~0.68~~ 0.85 acres of ruderal vegetation in the BSA. Abundant species within this community are predominantly non-native species and include mustard (*Hirschfeldia incana*), English plantain (*Plantago lanceolata*), common sow thistle (*Sonchus oleraceus*), Russian thistle (*Salsola tragus*), and Canada horseweed (*Erigeron canadensis*). This vegetation community is predominately non-native species and is not considered sensitive.

## Agriculture Fields

Agriculture fields are the largest land cover type within the BSA and occupy the majority of the BSA at approximately ~~43.14~~ 43.51 acres. The agriculture fields were under preparation during the survey, but seasonally contain strawberries. This land cover type also includes access roadways within the agriculture fields.

Figure 4.4-1 Vegetation Communities and Land Cover Types in BSA



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Fig 4. Vegetation Communities and Land Cover

## Developed

The developed lands are made up of roadways and bare ground made up of areas devoid of vegetation due to vehicle travel and roadway maintenance along Betteravia Road.

### b. Drainages and Wetlands

#### Drainages

No aquatic features are depicted on the *National Wetlands Inventory* (NWI; U.S. Fish and Wildlife Service [USFWS] 2020a) or *National Hydrography Dataset* (NHD; U.S. Geological Survey [USGS] 2020d) within the BSA. One irrigation drainage that ~~supplies irrigation water to agriculture crops~~ conveys irrigation runoff from adjacent agriculture fields was observed within the BSA along the eastern and northern perimeters of the project site (Appendix D). Based on review of aerial images (Google Earth 2020, 2021), this drainage is part of the regional irrigation system that does not have direct connectivity to any navigable waters, such as the Santa Maria River (located 2.3 miles east of the project) and the Pacific Ocean. The trapezoidal shaped irrigation drainage was excavated in uplands, wholly drains uplands, and is continually maintained.

The ordinary high water mark (OHWM) was defined by a bed and bank, change in vegetation coverage and a change in vegetation species. The OHWM was approximately 6-8 feet in width, 2-6 inches in depth, and the top of banks extend approximately ~~six~~ 6 feet from either side of the OHWM. The substrate within the OHWM was sandy loam.

Standing water was observed within the majority of the irrigation drainage at a depth between two and six inches. Water flows into this drainage predominantly from irrigation runoff from adjacent agriculture fields as well as from neighboring properties. During the field surveys, irrigation water runoff was observed flowing into the irrigation drainage at two locations directly from agriculture fields to the south of the drainage (Appendix D). The drainage is hydrologically connected to a basin located directly southeast of the BSA, along Telephone Road and Prell Road intersection. This basin was observed sending a slow flow of water west towards the BSA. The southeastern portion of the irrigation drainage converges with a ditch along Prell Road and eventually enters a culvert on the north side of Telephone Road. This culvert connects to a basin on the east side of Telephone Road. The basin was observed to have no direct connection to any traditional navigable waters.

Vegetation within the eastern and a part of the northern portion of the drainage is dominated by ~~willow weed smartweed~~, willowherb, jointed charlock, barnyard grass and Bermuda grass. Vegetation within the western portion of the drainage was predominantly barnyard grass, wild radish, and cheeseweed. In areas where surface water was observed near the irrigation drainage inputs, stands of California bulrush and cattail mixed with tall cyperus was observed. The banks were densely vegetated with mustard, English plantain, Russian thistle (*Salsola tragus*), and common sow thistle.

#### Wetlands

Wetlands are regarded as important biological resources both because of their rarity and because they serve a variety of functional values. Several types of wetlands exist in Santa Barbara County, including freshwater marshes, vernal pools, and riparian habitats. According to the County of Santa Barbara Environmental Thresholds and Guidelines Manual (September 2020), wetlands must have one or more of the following attributes:

- At least periodically, the land supports predominantly hydrophytes, that is plants adapted to moist areas,
- The substrate is predominantly un-drained hydric soil, and
- The substrate is non soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

The County of Santa Barbara’s Environmental Thresholds and Guidelines Manual also states examples of naturally occurring wetlands as coastal salt and brackish marshes, freshwater marshes, or vernal pools.

Due to the lack of any of the wetland parameters, no federal or state wetlands are present within the irrigation drainage. Additionally, although the irrigation drainage contains two of the three wetland parameters that define a County wetland, the drainage is not naturally occurring as it was constructed to solely convey agriculture irrigation discharge; therefore, it is not likely to be regulated by the County.

As described in the Jurisdictional Delineation Survey, the irrigation drainage is potentially subject to Regional Water Quality Control Board (RWQCB), CDFW, and Regional Water Quality Control Board (RWQCB) City jurisdictions as a streambed and non-wetland water of the State, respectively. Although the irrigation drainage appears to contain surface water for the majority of the year, it is an artificially irrigated area that would revert to upland if artificial irrigation ceases and does not exhibit a hydrologic surface connection to any other waters of the U.S. or navigable waters. Therefore, the irrigation drainage is not anticipated to fall within USACE jurisdiction (Appendix D).

### **c. Special Status Species**

For the purpose of this analysis, special status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS and National Marine Fisheries Service (NMFS) under the federal Endangered Species Act; those listed or proposed for listing as threatened or endangered by the CDFW under the California Endangered Species Act; plants listed as rare by the CDFW under the Native Plant Protection Act; and animals designated as “Species of Special Concern,” “Fully Protected,” or “Watch List” by the CDFW (CDFW 2020b). Those plants ranked as California Rare Plant Rank (CRPR) 1 or 2 are typically regarded as rare, threatened, or endangered under CEQA by lead agencies and were considered as such in this EIR. The CRPR utilizes the following code definitions:

- **List 1A** = Plants presumed extinct in California
- **List 1B.1** = Seriously endangered in California (over 80 percent of occurrences are threatened or have a high degree and immediacy of threat)
- **List 1B.2** = Fairly endangered in California (20 to 80 percent of occurrences are threatened)
- **List 1B.3** = Not very endangered in California (less than 20 percent of occurrences threatened or no current threats known)
- **List 2** = Rare, threatened or endangered in California, but more common elsewhere

CRPR List 3 species are “review list,” and CRPR 4 species are considered “watch list” species. CRPR 3 and 4 species do not typically warrant analysis under CEQA except where they are part of a unique community, from the type locality, or designated as rare or significant by local governments, or where cumulative impacts could result in population-level effects. The CRPR 3 and 4 species reported from



the region are not locally designated as rare or significant by the County, are not part of a unique community, and the project site is not known to be the type locality for any ranked plant species. Therefore, potential impacts to CRPR 3 and 4 species were not considered in this analysis.

As described in Section 4.4.3(a), Methodology and Significance Thresholds, a database and literature review was conducted to identify the regionally occurring special status species. The evaluation of potential to occur for each species identified in the records search is presented in Appendix E and is summarized below. The evaluation is based on the presence of the habitat types occurring within the project site and within the range of each respective species.

### **Special Status Plant Species**

Forty-three special status plant species are known to or have the potential to occur within the vicinity of the project area based on the database and literature review of records (Appendix E). However, the project site lacks suitable habitat for special status plants due to active agricultural activities, presence of ruderal vegetation, and overall high level of disturbance. Therefore, there is no potential for any special status plant species to occur onsite.

### **Special Status Animal Species**

Twenty-eight special status animal species are known to or have the potential to occur within the vicinity of the project area based on the database and literature review (Appendix E). Of the 28 animal species, the following five special status animal species may occur on the project site based on the presence of suitable habitat:

- California red-legged frog (*Rana draytonii*) - Federally Threatened (FT), State Species of Special Concern (SSC)
- Western pond turtle (*Emys marmorata*) - SSC
- Tri-colored blackbird (*Agelaius tricolor*) - State Threatened (ST), SSC
- Swainson's hawk (*Buteo swainsoni*) - ST
- American peregrine falcon (*Falco peregrinus anatum*) - Federally Delisted (FD), State Delisted (SD), State Fully Protected (FP)

Although definitive surveys for special status animal species were not conducted, no individuals or sign (e.g., dens, burrows, scat, tracks, etc.) indicating the presence of these special status animal species were observed during the reconnaissance-level field survey. As such, the following analysis of potential for occurrences is based on the habitat suitability and CNDDDB occurrences of these species in the vicinity of the BSA.

#### *California Red-legged Frog*

The California red-legged frog (CRLF) is listed as a federally threatened species and is a state species of special concern throughout its range. CRLF inhabits quiet pools of streams, marshes, and ponds. All life history stages are most likely to be encountered in and around breeding sites, which include coastal lagoons, marshes, springs, permanent and semi-permanent natural ponds, and ponded and backwater portions of streams, as well as artificial impoundments such as stock ponds, irrigation ponds, and siltation ponds. Eggs are typically deposited in permanent pools, attached to emergent vegetation.

The BSA is located within the known range of CRLF in Santa Barbara County and CNDDDB identifies multiple occurrences within one mile of the project site, including one observation (Occurrence #963) approximately 0.6 mile southwest of the BSA. The majority of the project area is heavily disturbed, and no suitable aquatic breeding habitat occurs within the project limits due to agricultural operations. However, there is marginally suitable open water aquatic habitat with emergent vegetation present along the north and east sides of the BSA within the irrigation drainage. Standing water was observed within the majority of the irrigation drainage at a depth between two and six inches. Water flows into this drainage predominantly from irrigation runoff from adjacent agriculture fields as well from neighboring properties. Therefore, the species has low potential to occur transiently within the BSA during conditions suitable for amphibian terrestrial dispersal movement, such as during wet conditions during or following rain events or at night as it travels between suitable aquatic breeding sites, which could lead to incidental occurrence in the project footprint.

#### *Southwestern Pond Turtle*

Southwestern pond turtle, a state species of special concern, is an aquatic turtle that occurs in ponds, marshes, rivers, streams and irrigation ditches that typically support aquatic vegetation. The species requires downed logs, rocks, mats of vegetation, or exposed banks for basking. Southwestern pond turtles lay their eggs in nests that are dug along the banks of streams or other uplands in sandy, friable soils. Southwestern pond turtles, especially those that reside in creeks, are also known to overwinter in upland habitats. Upland movements can be quite extensive, and individuals have been recorded nesting or overwintering hundreds of feet from aquatic habitats. The typical nesting season is usually from April through August; however, variation exists depending upon geographic location.

The closest CNDDDB observation of this species (Occurrence #951) was recorded approximately five miles southwest of the BSA. No southwestern pond turtles or basking sites were observed within the project limits; however, there is marginally suitable open water aquatic habitat with emergent vegetation present in a bulrush marsh within the irrigation drainage that is in the southeast portion of the BSA but outside of the project footprint. Therefore, this species has low potential to occur transiently within the BSA during upland dispersal movement, which could lead to incidental occurrence in the project footprint.

#### *Tri-colored Blackbird*

Tri-colored blackbird is listed as a state threatened species and is a state species of special concern. Tri-colored blackbird requires open water, protected nesting substrate, and adequate foraging area with insect prey within a few miles of the colony. The closest CNDDDB record of this species is approximately 5.6 miles south of the BSA (Occurrence #233). There is potential suitable nesting habitat for the species in the BSA in the emergent vegetation within the irrigation drainage, including the bulrush marsh that is in the southeast portion of the BSA but outside of the project footprint (Figure 4.4-1). Therefore, the species has low potential to nest near the project or occur transiently within the BSA incidentally if foraging or nesting nearby.

#### *Other Avian Species*

There is no suitable nesting habitat present within the BSA for special status species such as Swainson's hawk (ST) and American peregrine falcon (FD, SD, FP); however, there is low potential for these species to occur transiently within the project limits if foraging nearby.

#### **d. Sensitive Plant Communities**

Five special status plant communities were identified by the CNDDDB as occurring in the vicinity of the project site (Table 4.4-1). According to the CDFW's Vegetation Program, Alliances with State ranks of S1 through S3 are considered to be imperiled, and thus potentially of special concern. None of the special status plant communities identified by the CNDDDB were observed on the project site during the reconnaissance-level field survey or Jurisdictional Delineation Survey (Appendix D).

**Table 4.4-1 Sensitive Plant Communities within the Regional Vicinity of the Project Site**

<b>Plant Community</b>	<b>Global/State Rank</b>	<b>Habitat Presence/Absence</b>
Central dune scrub	G2/S2.2	Absent
Central foredunes	G1/S1.2	Absent
Coastal and valley freshwater marsh	G3/S2.1	Absent
Southern California Threespine Stickleback Stream	GNR/SNR	Absent
Southern Vernal Pool	GNR/SNR	Absent

Source: CDFW 2020a

#### **e. Wildlife Corridors**

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across large portions of the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Wildlife movement can be limited by roads, railroads, dams, canals, urban development, and agriculture.

Wildlife movement corridors can be both large and small scale. Regionally, the project site is not located within an Essential Connectivity Area (ECA) as mapped in the report California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (CDFW 2010). ECAs represent principal connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance ecological connectivity. ECAs are mapped based on coarse ecological condition indicators rather than the needs of particular species, and thus serve the majority of species in each region.

The project site is currently in active agricultural use that precludes most wildlife movement across the site. It is also surrounded by highly disturbed and developed agricultural lands. The existing constructed irrigation drainage provides a corridor for small animal movement in the area. However, after construction is completed, small wildlife will continue to be able to move through the area via culverts or other methods to allow for water conveyance.

### **4.4.2 Regulatory Setting**

Regulated or sensitive resources studied and analyzed herein include special status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. Potential impacts to biological resources were analyzed based on the following statutes:

- California Environmental Quality Act (CEQA)

- Federal Endangered Species Act (ESA)
- California Endangered Species Act (CESA)
- Federal Clean Water Act (CWA)
- California Fish and Game Code (CFGC)
- Migratory Bird Treaty Act (MBTA)
- The Bald and Golden Eagle Protection Act
- Porter-Cologne Water Quality Control Act (Porter-Cologne Act)
- County of Santa Barbara Environmental Thresholds and Guidelines Manual (2008)
- Santa Barbara County Comprehensive Plan (2009)

## **a. Federal Regulations**

### **Federal Endangered Species Act**

Under the ESA, authorization is required to “take” a listed species. Take is defined under ESA Section 3 as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Under federal regulation (50 Code of Federal Regulations Sections 17.3, 222.102); “harm” is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the ESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat. The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code Section 136, 16 United States Code Section 1531 et seq.).

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan that includes components to minimize and mitigate impacts associated with the take.

### **Migratory Bird Treaty and Bald and Golden Eagle Protection Acts**

The Migratory Bird Treaty Act authorizes the Secretary of the Interior to regulate the taking of migratory birds. The Act provides that it is unlawful, except as permitted by regulations, “to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird” (16 United States Code Section 703[a]). In addition, the Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 United States Code Section 703-711) and the Bald and Golden Eagle Protection Act (16 United States Code Section 668). Under the Bald and Golden Eagle Protection Act’s Eagle Permit Rule (50 Code of Federal Regulations 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

## **Clean Water Act**

Under Section 404 of the Clean Water Act (CWA), the U.S. Army Corps of Engineers (USACE), with oversight by the United States Environmental Protection Agency (USEPA), has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional waters of the United States requires a Section 404 permit from the USACE prior to the start of work. In 2008, the USEPA and the USACE, through a joint rulemaking, expanded the CWA Section 404(b)(1) guidelines to include more comprehensive standards for compensatory mitigation. These standards include ensuring that unavoidable impacts subject to regulation under the CWA are mitigated through replacement to promote no net loss of wetlands. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetlands is met by compensatory mitigation. In general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/USEPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with CWA Section 401, applicants for a Section 404 permit must obtain water quality certification from the appropriate RWQCB. Under the CWA, the USACE and RWQCB typically have jurisdiction over non-wetland waters with positive indicators of an OHWM and wetland waters that exhibit three parameters: suitable wetland hydrology, hydric soils, and hydrophytic vegetation.

### **b. State Regulations**

#### **California Endangered Species Act**

The CESA (CFGF Section 2050 et seq.) prohibits take of state-listed threatened and endangered species without a CDFW incidental take permit. “Take” under the CESA is defined as to “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” and is therefore restricted to direct harm of a listed species. Take under the CESA does not prohibit indirect harm by way of habitat modification (CFGF Section 86).

Requirements for the protection of fully protected species are described in CFGF Sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Community Conservation Plan.

#### **California Fish and Game Code Sections 3503, 3503.5 and 3511**

CFGF Sections 3503, 3503.5 and 3511 describe unlawful take, possession, or destruction of birds, nests and eggs. Fully protected birds described under CFGF Section 3511 may not be taken or possessed except under specific permit. CFGF Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

#### **Native Plant Protection Act**

The CDFW has authority to administer the Native Plant Protection Act (NPPA; CFGF Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under NPPA Section 1913(c), the owner of land where

a rare or endangered native plant is growing is required to notify the CDFW at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

### **California Fish and Game Code Section 1600 et seq.**

CFGF Section 1600 et seq. prohibits the substantial diversion or obstruction of the natural flow of, or substantial change to or use of any material from the bed, channel, or bank of any river, stream, or lake; or deposit or disposal of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake without prior notification to CDFW. In order for these activities to occur lawfully, the CDFW must receive written notification regarding the activity in the prescribed manner and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.

### **Natural Community Conservation Planning Act**

The Natural Communities Conservation Planning Act (Act) is directed by the CDFW and implemented by the State as well as by public and private partnerships as a means to protect habitat in California. The Act takes a regional approach to preserving habitat. Under this Act, a Natural Community Conservation Plan identifies and provides for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity. Once a Natural Community Conservation Plan has been approved, the CDFW may provide take authorization for all covered species, including fully protected species, under CFGF Section 2835.

### **Porter-Cologne Water Quality Control Act**

The State Water Resources Control Board (SWRCB) and each of nine local RWQCBs has jurisdiction over “waters of the State”, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state pursuant to the Porter-Cologne Act. The SWRCB has issued general Waste Discharge Requirements regarding discharges to “isolated” waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction). In the project area, the Central Coast RWQCB implements this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to CWA Section 401 for waters subject to federal jurisdiction, as described above.

### **c. Local Regulations**

The project is located in the County of Santa Barbara and is subject to the Policies set forth in the County of Santa Barbara Comprehensive Plan as well as associated ordinance in the County’s Municipal Code. Santa Barbara County has guidelines for evaluation of biological impacts and significance thresholds for projects in the County which are described in the County’s Environmental Thresholds and Guidelines Manual (September 2020) and A Planner’s Guide to Conditions of Approval and Mitigation Measures (May 2010, revised March 2016).

### 4.4.3 Impact Analysis

#### a. Methodology and Significance Thresholds

##### Methodology

A database and literature review was conducted of records from the CDFW California Natural Diversity Database (CNDDDB) (CDFW 2020c) and ~~California Native Plant Society (CNPS)~~ online Inventory of Rare and Endangered Plants of California (CNPS 2020) for the Santa Maria, California USGS 7.5-minute topographic quadrangle and surrounding eight quadrangles as well as the USFWS Information for Planning and Consultation (IPaC; USFWS 2020a) list of federally listed species. The Sensitive Natural Communities List in the CNDDDB is not currently maintained and no new information has been added. Therefore, vegetation types on site were also compared with the California Natural Community List (CDFW 2020a).

A reconnaissance-level field survey was conducted on September 14, 2020 to document the existing project site conditions and to evaluate the potential for presence of sensitive biological resources including sensitive plant and animal species, sensitive plant communities, potentially jurisdictional waters and wetlands, and habitat for federally and state protected nesting birds. The survey was conducted during late summer/early fall (September); therefore, potentially occurring spring and fall migrant species may have been present only transiently and breeders would not be present during the time of the survey. Likewise, plants more easily identified during their blooming periods in the spring and summer were difficult to detect without presence of identifiable characteristics (e.g., flowers and/or fruits). As the survey was performed during the day, identification of nocturnal wildlife was limited to sign (e.g., tracks, scat, burrows, nests, etc.) if present on site.

A follow-up Jurisdictional Delineation Survey was conducted by Rincon Associate Regulatory Specialist Carolynn Daman on September 23, 2020. Additional field work was conducted by Rincon Biologist Billy Fletcher on October 13, 2021. The details of this delineation can be found in Appendix D.

Plant species nomenclature and taxonomy followed *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et al. 2012). Vegetation communities were classified using *A Manual of California Vegetation, Second Edition* (MCV2; Sawyer et al. 2009), which establishes systematic classifications and definitions of vegetation communities. Updates to the MCV2 provided in the online database (CNPS 2021) were also considered. For those vegetated areas that could not be classified per MCV2, industry-standard vegetation community names were used. Additionally, land cover types were characterized in areas that lacked vegetation. Wildlife identification and nomenclature followed standard reference texts, including Sibley Field Guide to Birds of Western North America (Sibley 2014), Field Guide to Western Reptiles and Amphibians (Stebbins 2003), and Mammals of North America (Bowers et al. 2004). The habitat requirements for each regionally occurring special status species were assessed and compared to the type and quality of the habitats observed within the BSA during the field survey. Several sensitive species were eliminated from consideration as potential to occur on site due to lack of suitable habitat, lack of suitable soils/substrate, and/or known regional distribution.

##### Significance Thresholds

According to the State CEQA Guidelines (Appendix G), the project would result in a significant impact if it would:

1. Have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
2. Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

Potential impacts related to riparian habitat or other sensitive natural communities (Checklist Question 2); movements of resident or migratory fish or wildlife species (Checklist Question 4); conflicts with any local policies or ordinances protecting biological resources (Checklist Question 5); and conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan (Checklist Question 6) are discussed in Section 4.15, Effects Found Not to be Significant.

Guidelines for evaluation of biological impacts and significance thresholds are contained in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (September 2020) and the Santa Barbara County Planner's Guide to Conditions of Approval and Mitigation Measures (May 2010, revised March 2016). Determination of significance for disturbance to habitats or species within the County is based on the following criteria:

- a. Conflict with adopted environmental plans and goals of the community where it is located;
- b. Substantially affect a rare or endangered species of animal, plant or the habitat of the species;
- c. Interfere substantially with the movement of any resident or migratory fish or wildlife species;  
or
- d. Substantially diminish habitat for fish, wildlife, or plants.

The evaluation of project impacts as detailed in the Environmental Thresholds and Guidelines Manual calls for an assessment of both short- and long-term impacts. Significant impacts to species or habitats are those that substantially impact significant resources in the following ways:

- a. Substantially reduce or eliminate species diversity or abundance;
- b. Substantially reduce or eliminate quantity or quality of nesting areas;
- c. Substantially limit reproductive capacity through losses of individuals or habitat;
- d. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources;
- e. Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes); or



**Arctic Cold Agricultural Processor and Freezer Project**

- f. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Instances in which project impacts would be less than significant include:

- a. Small acreages of non-native grassland if wildlife values are low;
- b. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies;
- c. Areas of historical disturbance such as intensive agriculture;
- d. Small pockets of habitats already significantly fragmented or isolated, and degraded or disturbed; or
- e. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

Additional County guidelines are provided for specific biological communities located in the project site vicinity. These are used in conjunction with the general impact assessment guidelines described above.

*Wetlands*

Based on the County guidelines, the following types of project-created impacts may be considered significant:

- a. Projects that result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment;
- b. Wildlife access, use, and dispersal in wetland habitats are key components of their ecosystem value. Projects that substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have potentially significant impacts; and
- c. The hydrology of wetlands systems must be maintained if their function and values are to be preserved. Therefore, maintenance of hydrological conditions, such as the quantity and quality of runoff, must be assessed in project review.

*Riparian Habitats*

Based on the County guidelines, the following types of project-related impacts may be considered significant:

- a. Direct removal of riparian vegetation;
- b. Disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation;
- c. Intrusion within the upland edge of the riparian canopy (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers), leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion;
- d. Disruption of a substantial amount of adjacent upland vegetation where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian corridor, which reduces erosion and sedimentation potential; and

- e. Construction activity that disrupts critical time periods (nesting, breeding) for fish and other wildlife species.

There is no riparian habitat on the project site. Therefore, the proposed project would not result in impacts to riparian habitat, and the associated County significance thresholds listed above are not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a more detailed discussion on impacts to riparian habitat.

## **b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

**Impact BIO-1 THE PROJECT WOULD RESULT IN CONSTRUCTION IMPACTS TO SPECIAL STATUS ANIMAL SPECIES, IF PRESENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.**

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### **Special Status Plants**

The project site lacks suitable habitat for special status plants due to active agricultural activities, presence of ruderal vegetation, and overall high level of disturbance. Therefore, there is no potential for any special status plant species to occur onsite and no impacts to special-status plants would occur.

### **Special Status Animals**

Five special status animal species have a low potential to occur in the BSA (defined as the project site plus a 50-foot buffer): California red-legged frog (CRLF), southwestern pond turtle, tri-colored blackbird, Swainson's hawk, and American peregrine falcon. During the reconnaissance-level field survey, no special status animal species or their sign were observed in the BSA. The following subsections discuss potential construction impacts to these species. Once constructed, the facility would not introduce new long-term or operational impacts to these species compared to what currently occurs with the current mix of industrial and farming uses in the region. Water quality in the immediate vicinity may improve as a result of the project, as the agricultural run-off would cease from the portion of the agricultural field converted to the freezer facility. Additionally, pollutants of concern would be reduced in stormwater runoff through compliance with water quality standards and requirements, including implementation of Best Management Practices such as the retention/infiltration basin, as discussed in Section 4.10, Hydrology and Water Quality. Therefore, no long-term or operational impacts are discussed below for these species.

#### *California Red-legged Frog*

CRLF has the potential to occur in the irrigation drainage within the BSA. Encounters with CRLF would be limited to dispersing and foraging adults and sub-adults and would be dependent upon favorable weather conditions (e.g., during rain events or other times with elevated moisture levels). No impacts to eggs or tadpoles would occur because all work activity would be located in upland areas. Non-breeding aquatic habitat and the crossings over the irrigation drainage would still allow for wildlife movement below and through culverts. However, if CRLF individuals are present within the project

area, potential direct impacts would occur during project construction activities if harassment, injury, or mortality of CRLF individuals occurs. Indirect impacts to CRLF would also result from general project-related disturbance and noise in the vicinity of the work area that may impact normal breeding and dispersal patterns for the species in the area. Given the potential for direct and indirect impacts to CRLF individuals as well as direct impacts to CRLF habitat, impacts to CRLF from construction of the freezer facility would be potentially significant.

#### *Southwestern Pond Turtle*

Southwestern pond turtle has the potential to occur in the irrigation drainage within the BSA. Potential direct impacts to southwestern pond turtle include destruction of nests as well as harassment, injury, and mortality of individuals if they are present during construction activities. Indirect impacts would also result from general project-related disturbance and noise in the vicinity of the work area that may impact normal breeding and dispersal patterns for the species in the area. Due to the potential for impacts to individual turtles and/or nest sites that would impact the reproductive success of the local and regional population, impacts to southwestern pond turtle from construction would be potentially significant.

#### *Tri-colored Blackbird*

Tri-colored blackbird requires open water, protected nesting substrate, and adequate foraging area with insect prey within a few miles of the colony. This species has potential to nest in emergent vegetation within the irrigation drainage and/or forage in close proximity to the project area. Potential direct impacts would occur during project construction if harassment, injury, or mortality of nesting or foraging individuals occurs. Indirect impacts to nesting birds may also occur during construction activities in the vicinity of an active nest colony resulting in distress to adults and disruption of nesting behavior due to construction noise that may lead to nest abandonment or failure. Therefore, impacts to a nesting colony of tri-colored blackbird from construction would be potentially significant.

#### *Nesting Birds and Special Status Birds (including Swainson's Hawk and American Peregrine Falcon)*

In addition to tri-colored blackbird, other bird species protected by the MBTA and/or CFGC may also nest in emergent vegetation within the irrigation drainage, as well as trees and shrubs outside of the project footprint, and/or forage in close proximity to the project area. Special status bird species with the potential to occur transiently within the project limits include Swainson's hawk (ST), and American peregrine falcon (FP). Impact to these species are unlikely given that the BSA and immediate surroundings only provide foraging habitat for the species. Therefore, no direct or indirect impacts to nesting would occur. However, if individuals of Swainson's hawk or American peregrine falcon are present while foraging within the project area, potential direct impacts would occur during project construction if harassment, injury, or mortality of these individuals occurs. Indirect impacts to nesting birds may also occur if construction activities are in the vicinity of an active nest, resulting in distress to adults and disruption of nesting behavior due to construction noise that may lead to nest abandonment or failure. Therefore, impacts to nesting birds from construction, including the Swainson's hawk and American peregrine falcon, would be potentially significant.

## **Mitigation Measures**

### *BIO-1 California Red-legged Frog Avoidance and Minimization Measures*

The applicant shall ensure that following avoidance and minimization measures are implemented during project construction activities requiring ground disturbance:

- A qualified biologist shall survey the project site no more than 48 hours before the start of construction activities, including but not limited to vegetation removal, grading, excavation, and trenching. If a CRLF is found within the project footprint, no work shall begin, and consultation with the USFWS shall be initiated. Work shall not begin until authorization is provided by the USFWS to continue or applicable measures from a Biological Opinion/Incidental Take Statement (BO/ITS) or Habitat Conservation Plan/Incidental Take Permit (HCP/ITP) are successfully implemented.
- Before any construction or ground-disturbing maintenance activities begin, a biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of CRLF and its habitat, the specific measures that are being implemented to avoid dispersing CRLF, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.
- All vehicles and equipment shall be in good working condition and free of leaks. A spill prevention plan shall be established in the event of a leak or spill.
- Work shall be restricted to daylight hours to the extent feasible. If construction activities occur at night, a biological monitor shall be present. If a CRLF is found within the project footprint during active construction, all work shall stop, and the USFWS shall be notified. Work shall not recommence until authorization is provided by the USFWS to continue or applicable measures from BO/ITS or HCP/ITP are successfully implemented.
- Water shall not be impounded in a manner that may attract CRLF.
- All excavations or trenches shall be covered when not actively under construction or shall contain earthen ramps sufficient for CRLF to escape to avoid entrapment of CRLF or other wildlife species.
- Herbicides shall not be used on site during construction.
- No pets shall be permitted on site.
- A biological monitor shall be present during all initial ground-disturbing activities within the irrigation drainage, including but not limited to grading, excavation, and trenching. If a CRLF is found within the project footprint during active construction, all work shall stop, and the USFWS shall be notified. Work shall not recommence until authorization is provided by the USFWS to continue.

**Plan Requirements and Timing.** These measures are to be implemented during grading and construction activities.

**Monitoring.** The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The approved biologist shall submit monthly maintenance reports during construction to Planning and Development permit compliance staff.

*BIO-2 Southwestern Pond Turtle Avoidance and Minimization Measures*

The applicant shall ensure that the following avoidance and minimization measures are implemented during project construction activities requiring ground disturbance:

- A qualified biologist shall conduct a visual survey of work areas within 48 hours of initial ground-disturbing activities within suitable habitat, including but not limited to vegetation removal, grading, excavation, and trenching. Prior to the survey, suitable receptor sites shall be identified within suitable aquatic habitat nearby. If a turtle is observed in the work area, the biologist shall relocate it out of the work area to the respective receptor site.
- In the event that a southwestern pond turtle egg clutch is discovered during pre-construction surveys, the location shall be surrounded with high visibility fencing under the guidance of a qualified biologist. The nest shall be avoided by construction activities until a qualified biologist determines that the clutch has hatched. The CDFW shall also be contacted to provide additional guidance in the event that a southwestern pond turtle nest is discovered. If, during construction, a southwestern pond turtle nest is discovered, construction shall cease immediately upon the discovery, and CDFW shall be notified.

**Plan Requirements and Timing.** These measures are to be implemented during grading and construction activities.

**Monitoring.** The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The applicant shall submit a copy of the preconstruction survey report to Planning and Development permit compliance staff.

*BIO-3 Nesting Bird Avoidance and Minimization Measures*

The applicant shall ensure that the following avoidance and minimization measures are implemented during project construction activities:

- Initial site disturbance shall occur outside the general avian nesting season (February 1 through August 31), if feasible.
- If initial site disturbance occurs in a work area within the general avian nesting season indicated above, a qualified biologist shall conduct a preconstruction nesting bird survey no more than 14 days prior to initial disturbances in the work area. The survey shall include the entire area of disturbance area plus a 50-foot buffer (relevant to non-raptor species, excluding tri-colored blackbird) and 300-foot buffer (relevant to raptors and tri-colored blackbird) around the site. If active nests are located, all construction work should be conducted outside a buffer zone from the nest, which is to be determined by the qualified biologist. Buffers shall be established depending upon the species (except for tri-colored blackbird, see below), status of the nest, and construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist will confirm that breeding/nesting is complete and young have fledged the nest prior to removal of the buffer.
- If an active tri-colored blackbird nesting colony is found during preconstruction surveys, a minimum 300-foot non-disturbance buffer in accordance with "Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015" (CDFW 2015). This buffer shall remain in place for the duration of the breeding season or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and that they are no longer reliant upon the colony or parental care for survival.

- If construction activities in a given work area cease for more than 14 days, additional surveys shall be conducted for the work area. If active nests are located, the aforementioned buffer zone measures shall be implemented.

**Plan Requirements and Timing.** These measures are to be implemented during grading and construction activities.

**Monitoring.** The applicant shall maintain a County-approved biologist to monitor compliance with the above avoidance and minimization measures. The applicant shall submit a copy of the preconstruction survey report to Planning and Development permit compliance staff.

### **Significance After Mitigation**

Mitigation Measures BIO-1 through BIO-3 would require avoidance and minimization measures to reduce direct and indirect impacts to special status species from project construction. As a result, implementation of Mitigation Measures BIO-1 through BIO-3 would reduce project impacts on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS to a less than significant level.

**Threshold 3:** Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

**Impact BIO-2 THE PROJECT WOULD POTENTIALLY IMPACT A STATE JURISDICTIONAL FEATURE THROUGH DIRECT REMOVAL, FILLING, OR HYDROLOGICAL INTERRUPTION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.**

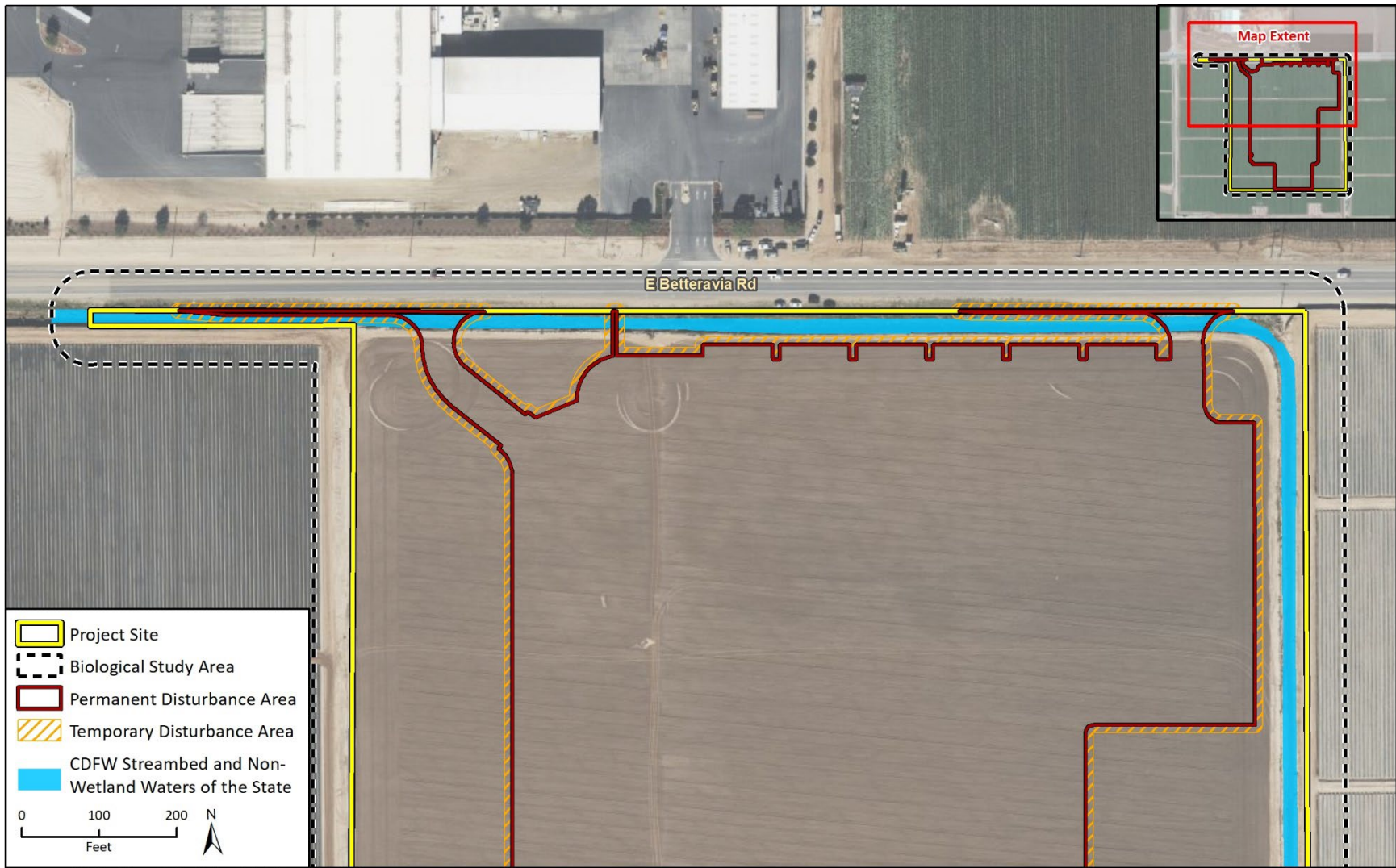
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The irrigation drainage within the BSA is potentially subject to RWQCB and CDFW jurisdictions. This drainage is part of the regional irrigation system that does not have direct connectivity to any navigable waters, such as the Santa Maria River and Pacific Ocean. The trapezoidal shaped irrigation drainage was excavated in uplands, wholly drains uplands, and is continually maintained.

The irrigation drainage does contain an ordinary high water mark (OHWM) and surface water; therefore, it may be regulated by the RWQCB under the Porter-Cologne Water Quality Control Act. Even though two wetland parameters were observed during wetland investigations, hydrophytic vegetation and wetland hydrology, the *SWRCB State Wetland Definition and Procedures for Discharge of Dredge or Fill Material to Waters of the State* (State Water Resources Control Board 2021) excludes wetlands that are created due to agricultural crop irrigation or stock watering. Therefore, no wetland waters of the state are present within the BSA, only non-wetland waters of the state are present. The irrigation drainage contains a streambed and banks with wetland plants that could support wildlife. The irrigation drainage provides moderate wildlife habitat throughout the year. Due to CDFW's indication that frequency of flow is not a determining factor in identifying streambeds and the subject feature provides potential wildlife habitat, this feature was mapped as a potential CDFW jurisdictional streambed (Appendix D) pursuant to CFGC Section 1600 et seq.

The project would have three crossings over the irrigation drainage (refer to Figure 4.4-2). Permanent impacts to CDFW/RWQCB jurisdiction would be approximately 0.05 acre and 150 linear feet. Temporary impacts to this habitat would be approximately 0.04 acre and 60 linear feet. These impacts would be potentially significant.

Figure 4.4-2 Jurisdictional Feature Impacts



Imagery provided by Microsoft Bing, Esri, and their licensors © 2021.

Fig 4.4.3 Jurisdictional Feature Impacts

## **Mitigation Measures**

### *BIO-4 Irrigation Drainage Compensatory Mitigation*

Due to the highly disturbed nature of the habitat within the artificial irrigation drainage, project impacts to the irrigation drainage shall be mitigated at a minimum ratio of 1.0:0.5 (acre impacted: acre enhanced/restored/created). Enhancement, restoration, and/or creation of habitat on the project site is preferable. However, the County may approve off-site restoration at a location in the same watershed as where the project impacts occur that results in equal compensatory value. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared which identifies the approach for implementing the compensatory mitigation. The HMMP shall be prepared by a qualified biologist/restoration ecologist and shall describe the compensatory mitigation. As part of the HMMP, a final mitigation implementation plan shall be submitted to and approved by the County prior to issuance of grading permits. The approved HMMP shall be implemented by the applicant, with the County verifying that the success criteria have been met. The HMMP shall include, at a minimum, the following components:

- Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);
- Goal(s) of the compensatory mitigation project (type[s] and area[s] of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type[s] to be established, restored, enhanced, and/or preserved);
- Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values of the compensatory mitigation site);
- Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [e.g., plant species to be used, container sizes, seeding rates, etc.]);
- Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- Monitoring plan for the compensatory mitigation site;
- Success criteria based on the goals and measurable objectives;
- An adaptive management program and remedial measures to address negative impacts to enhancement or restoration efforts;
- Notification of completion of compensatory mitigation; and
- Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

The HMMP shall be implemented for no less than three years after construction, or until the local jurisdiction and/or the permitting authority (e.g., RWQCB) has determined that restoration has been successful.

**Plan Requirements and Timing.** The applicant shall submit the HMMP to Planning and Development for review and approval prior to issuance of grading permits.

**Monitoring.** Planning and Development shall ensure that impacts to the drainage from the proposed project are properly mitigated.



### *BIO-5 Drainage Best Management Practices During Construction*

The project applicant shall ensure that the construction contractor implements the following best management practices during permitted grading and construction within the irrigation drainage and where construction occurs within 100 feet from the drainage.

- Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to the drainage, including locating access routes and ancillary construction areas outside of jurisdictional areas.
- To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed, including but not limited to straw wattles (free of monofilament), and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project footprint.
- During construction, no litter or construction debris shall be placed within the drainage. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.
- All project-generated debris, building materials, and rubbish shall be removed daily from jurisdictional areas and from areas where such materials could be washed into them.
- Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities, shall be prevented from contaminating the soil and/or entering the drainage.
- All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.

**Plan Requirements and Timing.** These measures shall be implemented during grading and construction and shall be included on all land use, grading, and building plans.

**Monitoring.** The applicant shall retain a County-approved biologist to monitor compliance with the above measures. Planning and Development compliance monitoring and building and safety staff shall periodically inspect for compliance.

### **Significance After Mitigation**

Mitigation Measures BIO-4 and BIO-5 specify actions to avoid, minimize, and mitigate for direct and indirect impacts to the jurisdictional drainage from development of the project. As a result, implementation of Mitigation Measures BIO-4 and BIO-5 would reduce project impacts on state protected waters/streambeds through direct removal, filling, hydrological interruption, or other means to a less than significant level.

### **c. Cumulative Impacts**

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of other reasonably foreseeable projects in the area, would be considered potentially significant. Significance for cumulative impacts to biological resources are based on:

- a. The cumulative contribution of other approved and proposed development to fragmentation of open space in the project site's vicinity;
- b. The loss of sensitive habitats and species;
- c. Contribution of the proposed project to urban expansion into natural areas; and
- d. Isolation of open space within the proposed project by future projects in the vicinity.

The geographic setting for potential cumulative impacts to biological resources is the northern portion of Santa Barbara County. Other cumulative developments considered in this analysis that could contribute to cumulative impacts to biological resources are listed in Table 3-1 in Chapter 3, Environmental Setting, of this EIR.

Continued development in the northern part of Santa Barbara County will cumulatively increase the potential for impacts to biological resources, in combination with the proposed project. Cumulative development in the northern part of Santa Barbara County includes approximately 1,496 new residential units and 94 commercial units that are currently proposed, in process, approved, or under construction, in addition to approximately 473,226 square feet of commercial, winery, and institutional development and approximately 61,756 square feet of agricultural and winery development. There is a potential for the proposed project, when considered with the other cumulative projects, to contribute incrementally to cumulative impacts to habitat loss, to CDFW/RWQCB jurisdictional areas, and to sensitive plant and animal species in northern Santa Barbara County.

Cumulative impacts to biological resources are addressed on a project-by-project basis through site-specific investigations and surveys as well as the development of the assessment of potential impacts and prescription of appropriate mitigation. Mitigation Measure BIO-1 through BIO-3 include measures to avoid impacts to CRLF, southwestern pond turtle, and nesting bird habitat and individuals during construction activities. Mitigation Measures BIO-4 and BIO-5 require implementation of measures to reduce impacts to irrigation drainages during construction and compensatory mitigation for impacts to irrigation drainages through enhancement, restoration, and/or creation of habitat. Implementation of these mitigation measures would reduce project-level impacts to biological resources to a less than significant level. The project site is currently being used for agricultural activities and the footprint of the proposed project is already comprised of developed and disturbed land. As such, the project's contribution to the cumulative loss of habitat and other cumulative impacts to biological resources would be less than significant.

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## 4.5 Cultural Resources and Tribal Cultural Resources

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The background information and analysis in this section is partially based on the *Phase I Cultural Resources Study* prepared for the project by LSA Associates, Inc. (LSA) in March 2020 (revised September 2020). The *Phase I Cultural Resources Study* contains confidential cultural resources information and is therefore not available for public review. The findings of this report are summarized in this section, and the report can be provided upon request to qualified cultural resource specialists.

### 4.5.1 Environmental Setting

#### a. Overview of Cultural Resources and Tribal Cultural Resources

Cultural resources are remains or traces left by prehistoric or historic people. Cultural resources are defined as archaeological sites dating from either the prehistoric or historic period, or historic built environment resources including standing buildings, structures, objects and features of history or aesthetic importance.

Tribal cultural resources are defined in CEQA Statutes Section 21074 as:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (a) included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register), or (b) included in a local register of historical resources
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.

A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Archaeological resources may also be tribal cultural resources if they meet these criteria.

#### b. Regional Setting

The Santa Barbara region, including the Santa Maria Valley, was historically occupied by the Chumash. The Chumash were a diverse population living in settlements along the California coast from Malibu Creek in the south to Estero Bay in the north, and from Tejon Pass, Lake Casitas and the Cuyama River inland to the islands of San Miguel, Santa Rosa, and Santa Cruz. Chumash society became increasingly complex over the past 9,000 years (Wallace 1955, Warren 1968). The ethnography, prehistory, and history of the region are described below.

#### Ethnography

The Chumash spoke six closely related Chumashan languages, which have been divided into two broad groups—Northern Chumash (consisting only of Obispeño) and Southern Chumash (Purisimeño, Ineseño, Barbareño, Ventureño, and Island Chumash) (Mithun 2001:389). Groups neighboring the Chumash included the Salinan to the north, the Southern Valley Yokuts and Tataviam to the east, and the Gabrielino (Tongva) to the south. Chumash place names in the project vicinity include *Pismu* (Pismo Beach), *Tematatimi* (along Los Berros Creek), and *Tilhini* (near San Luis Obispo) (Greenwood 1978).

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Permanent Chumash villages included hemispherical dwellings arranged in close groups (Brown 2001). Each Chumash village had a formal cemetery marked by tall painted poles, often with a defined entrance area (Gamble et al. 2001). Archaeological studies have identified separate sections for elite and common families within the cemetery grounds (King 1969).

The acorn was a dietary staple for the mainland Chumash, though its dominance varied by coastal or inland location. Chumash diet also included cattail roots, fruits and pads from cactus, and bulbs and tubers of plants such as amole (Miller 1988). On the coast, the wooden plank canoe (*tomol*) was employed in the pursuit of marine mammals and fish. The *tomol* not only facilitated marine resource procurement but also facilitated an active trade network maintained by frequent crossings between the mainland and the Channel Islands.

Chumash populations were decimated by the effects of European colonization and missionization (Johnson 1987). Traditional lifeways largely gave way to laborer jobs on ranches and farms in the Mexican and early American periods. Today, the Santa Ynez Band of Chumash Indians is the only federally recognized Chumash tribe, though many people of Chumash descent continue to live throughout their traditional territory.

**Prehistory**

Prehistoric chronology for southern California is divided into four distinct periods: Early Man Horizon (ca. 10,000 – 6,000 B.C.), Milling Stone Horizon (6,000 – 3,000 B.C.), Intermediate Horizon (3,000 B.C. – A.D. 500), and Late Prehistoric Horizon (A.D. 500 – Historic Contact) (Wallace 1955, Warren 1968, and Koerper and Drover 1983).

*Early Man Horizon (ca. 10,000 – 6,000 B.C.)*

The Early Man Horizon was a diverse mixture of hunting and gathering and focused on use of aquatic resources in coastal and inland lakeshore areas (Jones et al. 2002, Moratto 1984). However, the Early Man Horizon had a greater emphasis on hunting than later horizons. A warm and dry 3,000-year period called the Altithermal began around 6000 B.C. which was likely responsible for the change in human subsistence patterns, including a greater emphasis on plant foods and small game.

*Milling Stone Horizon (6,000 – 3,000 B.C.)*

The Milling Stone Horizon is “marked by extensive use of milling stones and mullers, a general lack of well[-]made projectile points, and burials with rock cairns” (Wallace 1955). The dominance of these types of artifacts indicates a subsistence strategy focused on collecting plant foods and small animals. A broad range of food resources were consumed including small and large terrestrial mammals, sea mammals, birds, shellfish and other littoral and estuarine species, near-shore fishes, yucca, agave, and seeds and other plant products (Kowta 1969; Reinman 1964).

Chipped stone artifacts associated with Milling Stone Horizon sites are predominantly manufactured from locally available lithic material. Chopping, scraping, and cutting tools along with grinding tools such as manos and metates<sup>1</sup> were common. Scraper-plane tools were likely used to process agave or yucca for food or fiber (Kowta 1969). Milling stones (such as manos and metates) were used to grind hard seeds into flour. The mortar and pestle, used for pounding acorns or other foods, were first used during the Milling Stone Horizon and their use increased dramatically in later periods (Wallace 1955, 1978; Warren 1968). Sometime during this period, people began making *Olivella* shell beads (beads

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<sup>1</sup> Manos are handheld stones used when grinding hard seeds on a metate, a flat or slightly hollowed oblong stone on which materials are ground.

made from the shell of a small sea snail), which possibly indicates the start of a regional exchange system (Glassow et al. 2007).

#### *Intermediate Horizon (3,000 B.C. – A.D. 500)*

The Intermediate Horizon is characterized by a shift toward a hunting and maritime subsistence strategy, as well as greater use of plant foods. During the Intermediate Horizon, there was a noticeable trend toward use of local resources along the coast, including a broad variety of fish, land mammal, and sea mammals. Tool kits for hunting, fishing, and processing food and materials reflect this increased diversity, with flake scrapers, drills, various projectile points, and shell fishhooks being manufactured.

Mortars and pestles became more common during this transitional period, gradually replacing manos and metates as the dominant milling equipment. Many archaeologists believe this change in milling stones signals a change from the processing and consuming of hard seed resources to the increasing reliance on acorns (e.g., Glassow et al. 1988; True 1993). Mortuary practices during the Intermediate typically included fully flexed burials oriented toward the north or west (Warren 1968).

#### *Late Prehistoric Horizon (A.D. 500 – Historic Contact)*

During the Late Prehistoric Horizon, the diversity of plant food resources and land and sea mammal hunting increased even further than during the Intermediate Horizon. More types of artifacts were observed during this period and high quality, exotic lithic materials were used for small, finely worked projectile points for bow and arrows. Steatite<sup>2</sup> containers were made for cooking and storage and there was an increased use of asphaltum, or naturally-occurring tar, for waterproofing. More artistic artifacts were recovered from Late Prehistoric sites and cremation became a common mortuary custom. Larger, more permanent villages supported an increased population size and social structure (Wallace 1955).

After A.D. 500, a wealth of ornaments, ceremonial, and artistic items characterize the Chumash Tradition along the central coast and offshore islands (Warren 1968). Ground stone items include bowls, mortars and pestles, balls, grooved stones, doughnut stones, stone beads, pendants, pipes, tubes, and mammal effigies. Projectile points, both large and small, were typically non-stemmed and leaf-shaped, with convex or concave bases. Chipped stone implements also included drills and scrapers. Utilitarian objects were made from bone (e.g., awls, fishhooks, whistles, and tubes) and shell (e.g., fishhooks and abalone shell dishes). Shell beads and ornaments were abundant, and bowls, pestles, pipes, and stone tubes were inlaid with shell beads and engraved. Bowls, pipes, and ornaments were commonly manufactured from steatite.

Characteristic mortuary practices during the Chumash Tradition included burial in crowded cemeteries. Burials were normally flexed, placed face down, and oriented toward the north or west (Warren 1968). The interments were typically marked by vertical pieces of whalebone and contained abundant grave goods, such as ornaments, effigies, and utensils.

## **History**

European settlement of the Santa Maria Valley began with the establishment of Mission San Luis Obispo in 1772 and Mission La Purisima in 1787. After gold was discovered elsewhere in California, settlers were drawn to the Santa Maria Valley by the possibility of free land, when mission lands were made available for private ownership. With the arrival of farmers and other settlers after California

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<sup>2</sup> A mineral talc, also known as soapstone.

gained statehood, the Santa Maria River Valley became one of the most productive agricultural areas in the state. Four prominent settlers, Rudolph Cook, John Thornburg, Isaac Fesler, and Isaac Miller each contributed 40 acres of land where their properties met to form what was then called “Grangerville” in 1875, and later became known as Santa Maria (City of Santa Maria, n.d.).

Oil exploration began in the valley in 1888, with large discoveries in the early 20<sup>th</sup> century. Oil discoveries rapidly attracted a growing population to the valley, bringing about the need for local governance. In 1905, Santa Maria was incorporated as a general law city. Over the decades it increased in size through several annexations (City of Santa Maria, n.d.).

A large military presence and operations were established in the region in 1941 with the development of an Army training camp, Camp Cooke, which was converted into Vandenberg Air Force Base in 1957 (Geiger, n.d.). The base is one of the largest employers in Santa Barbara County (State of California 2020). Orcutt developed and grew as a bedroom community between Santa Maria and the air force base (City of Santa Maria 2015). Much of the region remains rural in character with cattle ranches, grazing lands, open space, cultivated agriculture, and crude oil production. The Santa Maria Valley is home to several vineyards and wineries and primary crops include strawberries, celery, lettuce, peas, and squash (City of Santa Maria, n.d.).

### **c. Project Site Setting**

As described later in Section 4.5.3(a), Methodology and Significance Thresholds, a records search of the California Historical Resources Information System (CHRIS) was conducted to identify previously conducted cultural resource studies and previously recorded cultural resources within a 0.5-mile radius of the project site. The records search identified five previous archaeological surveys conducted within a 0.5-mile radius of the project site. No previous cultural resource studies included the project site. The records search did not identify any recorded cultural resources within the project site, but identified one recorded cultural resource, a linear resource consisting of a small gauge rail spur line, approximately 0.45 mile from the project site.

The Native American Heritage Commission’s (NAHC’s) Sacred Lands File (SLF) was searched to determine the presence or absence of Native American tribal cultural resources in the vicinity of the project site. The results of the Sacred Lands File search were negative, and no tribal cultural resources were identified in the area.

No cultural resources were identified during a survey of approximately 10 acres in the northeastern corner of the project site. Areas within close proximity to perennial water sources tend to have higher archaeological sensitivity. The Santa Maria River, the closest fresh water source to the project site, is over three miles from the project site. Subsurface Pleistocene soils formed over 11,700 years ago, and pre-date prehistoric human occupation of the project vicinity.

## **4.5.2 Regulatory Setting**

### **a. Federal Regulations**

#### **National Register of Historic Places**

The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act (NHPA) of 1966 as “an authoritative guide to be used by federal, State, and local governments, private groups, and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (CFR 36 CFR 60.2). The NRHP

recognizes properties that are significant at the national, State, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

- Criterion A:** It is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** It is associated with the lives of persons who are significant in our past
- Criterion C:** It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction
- Criterion D:** It has yielded, or may be likely to yield, information important in prehistory or history.

## **b. State Regulations**

### **California Register of Historical Resources**

The California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21084.1) requires that a lead agency determine whether a project could have a significant effect on historical resources. A historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

PRC Section 5024.1 requires an evaluation of potential historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. Criteria for determination of significant impacts to historical, cultural, and archaeological resources, including criteria for consideration of a resource as "historically significant" under CRHR, are described in Section 4.5.3(a), Methodology and Significance Thresholds.

PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical



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demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (CEQA Guidelines, Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (CEQA Guidelines, Section 15064.5[b][2][A]).

**Assembly Bill 52 (AB 52)**

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expands CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” According to the legislative intent for AB 52, “tribes may have knowledge about land and cultural resources that should be included in the environmental analysis for projects that may have a significant impact on those resources.” Section 21074 of AB 52 also defines a new category of resources under CEQA called “tribal cultural resources.” Tribal cultural resources are defined as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is either listed on or eligible for the CRHR or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource. See also PRC 21074 (a)(1)(A)-(B).

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent of AB 52 to accomplish all of the following:

- 1) Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities
- 2) Establish a new category of resources in CEQA called “tribal cultural resources” that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation
- 3) Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible
- 4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated (Because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources)
- 5) In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources early in the CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency

- 6) Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA
- 7) Ensure that local and tribal governments, public agencies, and project proponents have information available early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process
- 8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources
- 9) Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

### **Codes Governing Human Remains**

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

### **c. Local Regulations**

#### **County of Santa Barbara Comprehensive Plan Conservation Element**

The County of Santa Barbara Comprehensive Plan Conservation Element, adopted in 1979 and amended in 2010, recommends ways in which archaeological studies may be incorporated into projects. They are:

- Archaeological sites may be incorporated into parks or landscaped area in such a way that no damage will be done to the archaeological materials. Areas with archaeological sites may also be designated as limited use areas where they can be protected from vandalism. For either of these first two alternatives, a preliminary survey and surface collection by a competent archaeologist must be carried out prior to any action. Buffer zones adjacent to these sites may be necessary, but the extent of such a zone must be determined for each site.
- Outdoor museums are a feasible alternative to destruction when the nature of the archaeological remains is such that their careful excavation and preservation by professionals would prove attractive to the public. This alternative would be of value to the public relations of many private firms and would serve to increase the awareness of the County's prehistory among both residents and tourists. A museum of this sort might consist of a simple tin roof and fence protecting ongoing or completed excavations and appropriate displays of artifacts. Painted Cave is an example of how this approach has been implemented in Santa Barbara County.
- One method of preserving sites for future archaeological investigation is through the use of extensive land fill. If sites scheduled for possibly damaging use could be covered with sufficient clean fill to avoid damage, such sites would be preserved.

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- Salvage excavation is a last resort in the “preservation” of archaeological information. Such short notice excavations destroy relevant information which might be more effectively excavated with future improved archaeological methods and techniques. In salvage archaeology, it frequently is impossible to generate an adequate research design before excavation is commenced. Considering these factors, the loss of valuable information is inevitable. In addition, salvage operations are expensive undertakings. Consequently, every effort should be made to preserve, rather than excavate, endangered archaeological sites.

Other recommended approaches include:

- Public purchase and protection of representative sites from each topographic class (King, Moratto and Leonard n.d.).
- Granting of tax relief to private owners protecting archaeological resources (King, Moratto, and Leonard n.d.). Protection should include no alteration of the ground surface of any archaeological site, and no surface or subsurface collecting by private owners or the public. If this approach is implemented, specific guidelines for private protection of sites can be obtained from archaeologists at the University of California, Santa Barbara.
- Action by the County to preserve and protect known historic cemetery sites (less than 200 years old). Such a policy has been legislated by the State but initiative taken by County officials would ensure enforcement of the law.
- Designation of high density archaeological resource areas as Historical Monuments. Applications for placing such areas on the National Register of Historic Places presently are pending in Santa Barbara County.
- Development of public education programs which would include general information on the prehistory of Santa Barbara County, with emphasis on the importance of archaeological sites as a data base for further understanding of the aboriginal inhabitants. Such a program might decrease the rate at which archaeological resources are destroyed by vandalism.

The County’s Land Use and Development Code implements the Comprehensive Plan Conservation Element.

**County Landmarks and Places of Historic Merit Lists**

In addition to the CRHR, a resource listed in or eligible for listing in a local register also qualifies as a significant historical resource. CEQA Statute Section 21074(a)(1)(B) and CEQA Guidelines Section 15064.5(a)(2) indicate that resources included in a local register of historical resources are presumed to be significant historical resources.

Santa Barbara County has two such local registers: the Santa Barbara County Landmarks list, and Places of Historic Merit list. Both are maintained by the Historic Landmarks Advisory Commission (HLAC). Any resource listed in one of these registers is presumed to be a significant historical resource pursuant to CEQA. The review process for a property to become a County Landmark includes different criteria and reporting requirements for landmark designation than those used in CEQA review. A Landmark is any place, site, building, structure, or object having historical, aesthetic or other special character or interest and designated as a Landmark under the provisions of County Code Chapter 18A. A place, site, building, structure, or object is eligible for designation as a County Landmark if any of the following criteria are met:

- A) It exemplifies or reflects special elements of the County's cultural, social, economic, political, archaeological, aesthetic, engineering, architectural or natural history;
- B) It is identified with persons or events significant in local, state or national history;
- C) It embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- D) It is representative of the work of a notable builder, designer, or architect;
- E) It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic, prehistoric, archaeological, or scenic properties, or thematically related grouping of properties, which contribute to each other and are unified aesthetically by plan or physical development;
- F) It has a location with unique physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the County of Santa Barbara;
- G) It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;
- H) It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes or distinctive examples of park or community planning;
- I) It is one of the few remaining examples in the County, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

A designated County Landmark is preserved and protected by conditions restricting its demolition, removal, alteration, or use. The specific conditions for each landmarked property are spelled out in the Board Resolution which finalized the property's Landmark status. Plans for alterations to Landmarks are required to be reviewed by the HLAC for approval. Designation as a Place of Historic Merit officially recognizes the building or site as having historic, aesthetic or cultural value. A Place of Historic Merit, as opposed to a Landmark, is not protected by restrictions as to demolition, removal, alteration or use, but it would usually qualify as a historical resource in the context of CEQA environmental review. Designation as a Landmark recognizes the building or site at a higher level of historic, aesthetic, or cultural significance.

### 4.5.3 Impact Analysis

#### **a. Methodology and Significance Thresholds**

##### **Methodology**

LSA completed a *Phase I Cultural Resources Study* in March 2020 (revised September 2020) in support of the proposed project. The study included a cultural resources records search, literature review, Sacred Lands File search, aerial photograph and map review, and a pedestrian survey. Rincon Consultants peer-reviewed the *Phase I Cultural Resources Study* under contract to the County, and the analysis of cultural resources impacts in this section is based on empirical research presented in the *Phase I Cultural Resources Study*.

### *Cultural Resources Records Search*

The Central Coast Information Center (CCIC) at the University of California, Santa Barbara conducted a search of the CHRIS records on March 6, 2020. The search was conducted to identify previously conducted cultural resource studies and previously recorded cultural resources (prehistoric or historic) within a 0.5-mile radius of the project site. Background research also included a review of the NRHP, CRHR, listings of National Historic Landmarks, California Historical Landmarks, California Points of Historical Interest, and the California Office of Historic Preservation's Historic Property Data File.

### *Native American Heritage Commission Sacred Lands File*

As part of the *Phase I Cultural Resources Study* completed in support of the proposed project, a request was submitted to the NAHC on March 3, 2020 for a review of the SLF to determine the presence or absence of Native American cultural resources that might be impacted by the proposed project. The NAHC responded on March 6, 2020, stating the results were negative and no Native American cultural resources were known in the area. As part of the County's peer review of the *Phase I Cultural Resources Study*, a second request was submitted to the NAHC on November 17, 2020 for a review of the Sacred Lands File and the response, received November 25, 2020, had the same negative results.

### *Cultural Resources Field Investigation*

A pedestrian survey of a portion of the 40-acre project site was conducted on March 9, 2020. Only 25 percent of the project site (approximately 10 acres in the northeastern corner of the project site) was surveyed "due to existing planted crops or recent blading in preparation of planting crops." Transects were spaced less than 5 meters apart and a trowel was used to periodically spread out recently disturbed (plowed and disked) soil to examine the soil for archaeological deposits and/or human remains. Ground visibility was 100 percent in the approximately 10-acre area that was surveyed; however, the soil had been extremely disturbed as a result of plowing and disking, with remnants of the agricultural crop on the surface and partially buried below the surface. No cultural resources were identified during the survey.

### *AB 52 Tribal Consultation*

As part of the AB 52 consultation process, the County sent letters to Chairman Kenneth Kahn, Santa Ynez Band of Chumash Indians, and Chair Julie Tumamait-Stenslie, Barbareño/Ventureño Band of Mission Indians, on December 11, 2020. One request for tribal consultation was received from the Santa Ynez Band of Chumash Indians, who requested to review the Cultural Resources and Tribal Cultural Resources section of the Draft EIR during the public review period. No other requests for tribal consultation have been received to date.

## **Significant Thresholds**

In accordance with Appendix G of the CEQA Guidelines, an impact to cultural resources is considered significant if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5;

3. Disturb any human remains, including those interred outside of dedicated cemeteries.

In accordance with Appendix G of the CEQA Guidelines, an impact to tribal cultural resources is considered significant if the project would:

4. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
  - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The significance of a cultural resource and impacts to the resource is determined by whether or not that resource can increase our knowledge of the past. The primary determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the *CEQA Guidelines* and the *Santa Barbara County Environmental Thresholds and Guidelines Manual*.

CEQA declares that the State of California will “take all steps necessary to provide the people of this state with [...] enjoyment of [...] historic environmental qualities.” The CEQA definition of “environmental qualities” includes objects of historic, archaeological, aesthetic significance (Public Resources Code (PRC) 21001).

CEQA Guidelines Section 15064.5, Determining the Significance of Impacts to Archaeological Resources, states:

Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, Section 5024.1, Title 14 CCR, Section 4852) including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.
- A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The Cultural Resource Guidelines in the *Santa Barbara County Environmental Thresholds and Guidelines Manual* provide local criteria for determining the significance of archaeological resources. County criteria for “important archaeological resource” are identical to the CEQA Guidelines criteria.

## **b. Project Impacts and Mitigation Measures**

<b>Threshold 1:</b> Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?
<b>Threshold 2:</b> Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

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**IMPACT CUL-1 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HISTORICAL OR ARCHAEOLOGICAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

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The project site is currently used for row crop production and does not feature any structural development. No structures or formal landscape features identified as historic resources currently exist on the project site.

As discussed in Section 4.5.1(a), Overview of Cultural Resources and Tribal Cultural Resources, the CHRIS cultural resources records search results indicate no archaeological resources have been recorded within the project site. No cultural materials were identified during a pedestrian survey of approximately 10 acres in the northeastern corner of the project site. The closest fresh water source to the project site was over three miles away and subsurface soils pre-date human occupation of the project vicinity. Therefore, the likelihood of encountering archaeological resources on the project site is low.

Although no archaeological resources are known to exist within the project site, only 25 percent of the project site was surveyed and there is potential for unanticipated discoveries of cultural resources during project ground disturbance. In the event of an unanticipated discovery, impacts to unknown archaeological resources would be potentially significant and mitigation measures would be required. Mitigation Measure CUL-1 requires that construction activities halt in the event of an unanticipated discovery until the find can be assessed by a qualified archaeologist. Mitigation Measure CUL-1 also requires the appropriate treatment of the find to reduce impacts to the archaeological resource.

### **Mitigation Measures**

#### *CUL-1 Unanticipated Discovery of Historical or Archaeological Resources*

- Prior to construction, the Construction Contractor shall ensure that a County-qualified archaeologist and a local tribal representative funded by the applicant shall be involved in the design and implementation of a Worker Education Program (WEP) for all project construction supervisors and field personnel who may encounter unknown cultural resources during earthmoving activities. ~~In the event historical or archaeological resources are unexpectedly encountered during ground-disturbing construction activities, the Construction Contractor shall halt work within 50 feet of the find. The Applicant shall immediately notify the County of Santa Barbara Planning & Development Staff and retain a County approved archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology (National Park Service 1983) to evaluate the discovery. If the discovery is prehistoric, then the County approved~~

~~archaeologist shall contact a local tribal representative to participate in the evaluation of the discovery. If necessary, the evaluation shall include preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources. Work shall not resume until authorization is received from County Planning & Development Staff.~~

- The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant.

**Plan Requirements and Timing.** This condition shall be printed on all building and grading plans prior to approval of such plans. A Worker Education Program (WEP) shall be designed and implemented for all project construction supervisors and field personnel who may encounter unknown cultural resources during earthmoving activities. The WEP shall be presented at a pre-construction workshop conducted by a County-qualified archaeologist and a local tribal representative funded by the applicant. Attendees shall include the applicant, archaeologist, tribal representative, construction supervisors, and heavy equipment operators to ensure that all parties understand the cultural resources monitoring program and their respective roles and responsibilities. The names of all personnel who attend the workshop shall be recorded and all personnel attendees shall be issued hardhat stickers denoting that they have received workshop training. This workshop shall be videotaped and shown to any new employees or subcontractors that may be needed during ground-disturbance construction activities. Names of newly trained personnel shall be recorded and those personnel issued appropriate hardhat stickers.

**Monitoring.** The Planning & Development permit processing planner shall check plans prior to issuance of grading permits and Planning & Development compliance monitoring staff shall attend the pre-construction workshop, and spot check in the field throughout grading and construction.

### Significance After Mitigation

Implementation of Mitigation Measure CUL-1 would reduce the potential impact to unanticipated archaeological resources to less than significant.

<b>Threshold 3:</b> Would the project disturb any human remains, including those interred outside of formal cemeteries?
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**IMPACT CUL-2 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HUMAN REMAINS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

No human remains or prehistoric villages where human remains and/or cemeteries are known to exist within the project site or within the vicinity of the project site. However, in the event of an unanticipated discovery of human remains, the State of California Health and Safety Code Section 7050.5 requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and



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disposition of the human remains pursuant to Public Resources Code Section 5097.98. If the human remains are determined to be prehistoric, the coroner would notify the NAHC, which would determine and notify a most likely descendant (MLD). The MLD would complete an inspection of the site within 48 hours of being granted access to the site. The MLD would be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. Recommendations by the MLD may include: (1) the nondestructive removal and analysis of human remains and items associated with Native American human remains; (2) preservation of Native American human remains and associated items in place; (3) relinquishment of Native American human remains and associated items to the descendants for treatment; or (4) other culturally appropriate treatment.

With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, impacts to human remains would be less than significant.

**Mitigation Measures**

No mitigation measures are required because this impact would be less than significant.

**Threshold 4:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**IMPACT CUL-3 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

No cultural resources were identified as a result of the records search, Sacred Lands File search, and pedestrian survey conducted as part of the *Phase I Cultural Resources Study* prepared for the project. No tribal cultural resources have been identified on the project site to date. However, Santa Barbara County has a long history of Native American occupation and, therefore, all ground-disturbing activities have the potential to uncover previously undiscovered unknown tribal cultural resources.

Pursuant to the requirements of AB 52 the County conducted Native American consultation for the project to identify potential concerns or issues associated with Native American cultural resources within the project vicinity. As part of the AB 52 consultation process, the County sent letters to Chairman Kenneth Kahn, Santa Ynez Band of Chumash Indians, and Chair Julie Tumamait-Stenslie, Barbareño/Ventureño Band of Mission Indians, on December 11, 2020. One request for tribal

consultation was received from the Santa Ynez Band of Chumash Indians, who requested to review the Cultural Resources and Tribal Cultural Resources section of the Draft EIR during the public review period. No other requests for tribal consultation have been received to date.

During project ground disturbing activities such as grading and surface excavation, there is potential for encountering previously undiscovered cultural resources of Native American origin that could be considered tribal cultural resources. Therefore, impacts to tribal cultural resources would be potentially significant and mitigation would be required. Mitigation Measure CUL-2 requires consultation with local Native American tribes and implementation of a tribal cultural resource mitigation plan in the event that a tribal cultural resource is identified during construction.

## **Mitigation Measures**

The following mitigation measure would reduce potential impacts to a less than significant level.

### *CUL-2 Unanticipated Discovery of Tribal Cultural Resources*

In the event that a resource of Native American origin is identified during construction, the County of Santa Barbara Planning & Development Staff shall contact all California Native American tribe(s) that have expressed interest and begin or continue consultation procedures with that tribe(s). If the County, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and the proposed project will have a potentially significant impact to the resource, a tribal cultural resource mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measure.

**Plan Requirements and Timing.** This condition shall be printed on all building and grading plans.

**Monitoring.** A County Planning & Development permit processing planner shall check plans prior to issuance of grading permits, and Planning & Development compliance monitoring staff shall spot check in the field throughout grading and construction.

## **Significance After Mitigation**

Implementation of Mitigation Measure CUL-2 would reduce the potential impact to previously unidentified tribal cultural resources on the project site to a less than significant level.

## **c. Cumulative Impacts**

Cumulative development in the northern portion of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed (in process), approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project. This cumulative development would have the potential to disturb archaeological and tribal cultural resources as well as human remains.

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The California State Archaeological Task Force has estimated that 81 percent of archaeological sites in Santa Barbara County have been destroyed. The project, in conjunction with other nearby planned, pending, and potential future projects would have the potential to adversely impact cultural resources. Implementation of Mitigation Measures CUL-1 would reduce the project's potential impacts to cultural resources to a less than significant level.

Individual development proposals are reviewed separately by the County and undergo environmental review when it is determined that the potential for significant impacts exists. In the event that future cumulative development would result in impacts to known or unknown cultural resources, impacts to such resources would be addressed on a case-by-case basis. Cumulative development project would be expected to implement similar measures as the proposed project to reduce impacts to archeological resources or human remains. Therefore, the project would not contribute to cumulative impacts related to the incremental loss of cultural resources.

The geographic scope for considering cumulative impacts to tribal cultural resources is based on the ethnographic use patterns of the project site and surrounding region. For the ethnographic period, the geographic extent includes the entire traditional Chumash territory. Development of past, present, and reasonably foreseeable future developments could cumulatively contribute to the erasure of Chumash tribal cultural resources from the landscape. However, compliance with the mitigation measures detailed above in Mitigation Measures CUL-2 and with the provisions of AB 52 would ensure that any known or potential tribal cultural resources are treated in consultation with local Native American groups. Compliance with AB 52 and continued involvement by local Native American groups in regional planning would generally limit the destruction of tribal cultural resources such that cumulative impacts would be less than significant. Given that no tribal cultural resources have been identified on the project site and the site has low archaeological sensitivity due to on-site soil types and previous agricultural disturbance, impacts to any potential tribal cultural resources would be less than significant with mitigation and would not contribute to a significant cumulative effect. This impact would not be cumulatively considerable.

## 4.6 Energy

This section analyzes the energy impacts of developing and operating the proposed project. The analysis is supported by data and information from the *Air Quality and Greenhouse Gas Analysis Memorandum* prepared by LSA Associates in January 2021 (Appendix C). Calculations for energy derived from project fuel consumption are presented in Appendix C following the *Air Quality and Greenhouse Gas Analysis Memorandum*.

### 4.6.1 Environmental Setting

Energy use relates directly to environmental quality because it can adversely affect air quality and can generate greenhouse gas (GHG) emissions that contribute to climate change. Fossil fuels are burned to create electricity, heat and cool buildings, and power vehicles. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes.

Energy use is typically quantified using the British thermal units (Btu). The Btu is the amount of energy that is required to raise the temperature of one pound of water by 1 degree Fahrenheit. As points of reference, the approximate amount of energy contained in a cubic foot of natural gas, a kilowatt hour (kWh) of electricity, and a gallon of gasoline are 1,000 Btu, 3,400 Btu, and 123,000 Btu, respectively. Natural gas usage is expressed in U.S. therms with one U.S. therm equal to 100,000 Btu.

#### a. Electricity

In 2019, California used 277,704 gigawatt-hours (GWh) of electricity, of which 31.7 percent were from renewable resources (California Energy Commission [CEC] 2021a). Pacific Gas & Electric (PG&E) would provide electricity to the project. Table 4.6-1 shows the electricity and natural gas consumption by sector and total for PG&E.

**Table 4.6-1 Electricity Consumption in 2019 for the PG&E Service Area**

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
4,489.7	29,559.9	4,348.8	9,709.6	1,642.0	28,014.2	307.5	78,087.7

Notes: Usage expressed in GWh  
 Source: CEC 2021a

PG&E’s energy sources include renewable power sources, large hydroelectric, natural gas, nuclear, and unspecified sources of power (electricity from transfers that are not traceable to specific generation sources).

#### b. Natural Gas

California consumed approximately 13,158 million U.S. therms (MMthm) of natural gas in 2019 (CEC 2021b). The project site would be provided natural gas by Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern and Central California and provides natural gas for residential, commercial, and industrial markets, as well as for electric generation.

Table 4.6-2 shows the natural gas consumption by sector and total for SoCalGas. In 2018, SoCalGas provided approximately 41 percent of the total natural gas usage in California, with approximately 42 percent consumed for residential use and 58 percent for industrial, commercial, and other uses.

**Table 4.6-2 Natural Gas Consumption in 2019 for SoCalGas Service Area**

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
72.5	947.9	81.9	1,684.4	219.4	2,418.6	5,424.7

Notes: Usage expressed in MMThm  
 Source: CEC 2021b

### c. Petroleum

In 2018, approximately 40 percent of the state’s energy consumption was used for transportation activities (United States Energy Information Administration [USEIA] 2021). Though California’s population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.8 billion gallons in 2017 to between 12.1 billion and 12.6 billion gallons in 2030, a 19 to 22 percent reduction. This decline comes in response to both increasing use of electric vehicles (EVs) and higher fuel economy for new gasoline vehicles (CEC 2018a).

## 4.6.2 Regulatory Setting

### a. Federal Regulations

#### Corporate Average Fuel Economy Standards

The Corporate Average Fuel Economy (CAFE) standards are federal rules established by the National Highway Traffic Safety Administration (NHTSA) that set fuel economy standards for new passenger cars and light trucks sold in the United States. The CAFE standards become more stringent each year, reaching an estimated 38.3 miles per gallon (mpg) for the combined industry-wide fleet for model year 2020 (77 Federal Register 62624 et seq.). It is, however, legally infeasible for individual municipalities to adopt more stringent fuel efficiency standards. The Clean Air Act (CAA) (42 United States Code [USC] Section 7543[a]) states that “no state or any political subdivision therefore shall adopt or attempt to enforce any standard relating to the control of emissions from new motor vehicles or new motor vehicle engines subject to this part.” In August 2016, the United States Environmental Protection Agency (USEPA) and NHTSA announced the adoption of the phase two programs related to the fuel economy for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.

#### Energy Policy and Conservation Act

Enacted in 1975, this legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the NHTSA, a part of the U.S. Department of Transportation, for establishing and regularly updating vehicle standards. The USEPA administers the CAFE program, which determines vehicle manufacturers’ compliance with

existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 mpg for the 1975 model year to 30.7 mpg for the 2014 model year and is expected to increase to 54.5 mpg by 2025.

## **Energy Star Program**

In 1992, the USEPA introduced Energy Star as a voluntary labeling program to identify and promote energy-efficient products. The program applies to major household appliances, lighting, computers, and building components, such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specification for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now includes qualifying commercial and industrial buildings as well as homes.

## **Energy Independence and Security Act of 2007**

The Energy Independence and Security Act of 2007 was designed to improve vehicle fuel economy and help reduce nationwide dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard by requiring fuel producers to use at least 36 billion gallons of biofuel in 2022 and reduces U.S. demand for oil by setting a national fuel economy standard of 35 mpg by 2020.

### **b. State Regulations**

#### **California Energy Action Plan**

The CEC, in collaboration with California Public Utilities Commission (CPUC), is responsible for preparing the California Energy Action Plan (EAP), which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The 2003 California EAP called for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identified several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs; and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In the October 2005 EAP II, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as information on the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change. In 2008, the CEC determined an update to the plan was not needed due to state regulations such as Assembly Bill (AB) 32.

#### **Assembly Bill 2076: Reducing Dependence on Petroleum**

Pursuant to AB 2076 (Chapter 936, Statutes of 2000), the CEC and California Air Resources Board (CARB) prepared and adopted a joint-agency report, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency

of motor vehicles, and reduce per capita VMT. One performance-based goal for AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

### **Integrated Energy Policy Report**

SB 1389 (Chapter 568, Statutes of 2002) required the CEC to conduct assessments and forecasts of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC uses these assessments and forecasts to develop energy policies and recommendations to conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

### **Senate Bill X1-2: California Renewable Energy Resources Act**

In 2011, the Governor signed SB X1-2, which requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 33 percent of their electricity supply from renewable sources by 2020. The CPUC and CEC implement the statewide RPS program through rulemakings and monitoring the activities of electric energy utilities in the State.

### **Senate Bill 1078: California Renewables Portfolio Standard Program**

SB 1078 (Chapter 516, Statutes of 2002), and as expanded under SB X1-2, establishes a Renewables Portfolio Standard (RPS) for electricity supply. The initial RPS program only required electrical corporations to provide 20 percent of their supply from renewable sources by increasing its total procurement at least one percent each year to reach the 20 percent goal. SB X1-2 expanded this law by making it applicable to retail sellers of electricity and required procurement from eligible renewable energy resources to 33 percent by 2020.

### **Senate Bill 100**

Adopted on September 10, 2018, SB 100 accelerates the state's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

### **Assembly Bill 1493**

AB 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code sections 42823 and added 43018.5 requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

### **Assembly Bill 1007: State Alternative Fuels Plan**

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a state plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, state, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet

California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

### **Bioenergy Action Plan, Executive Order S-06-06**

Executive Order (EO) S-06-06, April 25, 2006, establishes targets for the use and production of biofuels and biopower, and directs State agencies to work together to advance biomass programs in California, while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. EO S-06-06 also calls for the state to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the State can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

- Increase environmentally and economically sustainable energy production from organic waste
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
- Create jobs and stimulate economic development, especially in rural regions of the State
- Reduce fire danger, improve air and water quality, and reduce waste

### **California Building Standards Code**

The California Code of Regulations (CCR), Title 24, is referred to as the California Building Code, or CBC. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. The CBC's energy efficiency and green building standards are outlined below.

#### *Part 6 – Building Energy Efficiency Standards*

The CCR, Title 24, Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings to reduce California's energy demand. The Building Energy Efficiency Standards are updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC.

The 2019 standards went into effect on January 1, 2020, and therefore are applicable to the project. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements (CEC 2018b). Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards, and single-family homes will be 7 percent more energy efficient (CEC 2018b). When accounting for the electricity generated by the solar photovoltaic system, single-family homes would use 53 percent less energy compared to homes built to the 2016 standards (CEC 2018c).



### *Part 11 – California Green Building Standards*

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The 2016 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of EV charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Installation of EV charging stations at least five percent of the parking spaces for new multi-family and non-residential developments.

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

### **c. Local Regulations**

#### **County of Santa Barbara Comprehensive Plan and County Code**

The County of Santa Barbara Comprehensive Plan includes an Energy Element that contains long-range planning guidelines and strategies to encourage energy efficiency and alternative energy sources in Santa Barbara County. However, it does not include requirements applicable to individual development projects (County of Santa Barbara 2015c).

Santa Barbara County Code Article VI adopts the California Energy Code, 2016 Edition as the Primary Energy Code of the County. The California Energy Code has specific requirements for building design to reduce energy consumption, including the use of certain building materials to ensure a greater degree of energy efficiency during building operation and construction and energy efficiency standards for appliances, lighting amenities, and water fixtures, among other project components.

#### **County of Santa Barbara Energy and Climate Action Plan**

The Santa Barbara County Board of Supervisors adopted the Energy and Climate Action Plan (ECAP) in May 2015. The ECAP contains objectives and policies that seek to reduce energy use in the County

and to provide renewable energy sources. Applicable energy objectives and goals that relate to the project include:

- **III-1: Built Environment:** To foster development and renovations that increase energy efficiency through location, design, construction, and systems.
- **III-3: Community Choice Energy (CCE):** The CCE model puts energy purchasing and pricing options into the hands of local decision-makers and allows the community to determine what type of energy mix serves its needs.
- **III-7: Industrial Energy Efficiency:** To improve the efficiency of industrial sector energy uses and processes.
- **III-8: Agriculture:** To promote science-based and economically sound strategies to lower greenhouse gas emissions from agricultural production.

## **2040 Regional Transportation Plan**

Santa Barbara County Association of Governments (SBCAG) has incorporated a sustainable community strategy into its 2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is designed to help the region achieve its GHG emissions reduction target. The 2040 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. GHG reductions achieved through the 2040 RTP/SCS would result in corresponding reductions in energy consumption in the region. The RTP/SCS sets forth goals and objectives related to mixed-use development and the jobs-housing balance by allotting more jobs to the northern portion of Santa Barbara County.

### 4.6.3 Impact Analysis

#### **a. Methodology and Significance Thresholds**

##### **Methodology**

The energy analysis is supported by data and information from the Air Quality and Greenhouse Gas Analysis Memorandum prepared by LSA Associates in January 2021 (Appendix C). The Air Quality Analysis and Greenhouse Gas Analysis Memorandum uses methods and assumptions recommended in the County of Santa Barbara Environmental Thresholds and Guidelines Manual and has been peer reviewed by SBCAPCD and Rincon Consultants. Construction energy demand reflect the construction equipment, scheduling, and trip estimates from the Memorandum's CalEEMod outputs. Construction energy demand considers diesel fuel consumption associated with operation of construction equipment and vendor/hauling truck trips, as well as gasoline fuel consumption associated with worker trips to and from construction sites. Energy demand for off-road construction equipment is based on anticipated equipment, usage hours, horsepower, load factors, and construction phase duration provided by the CalEEMod output.

Operational energy demand considers transportation-based fuel consumption as well as electricity and natural gas consumption associated with the project. Transportation-based fuel consumption is based on trip generation rates calculated in the project's Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) and fleet mix obtained from CalEEMod. Electricity and natural gas consumption were also based on CalEEMod outputs and compared to existing consumption in the PG&E and SoCalGas service areas.

## Thresholds of Significance

The following thresholds are based on Appendix G of the *State CEQA Guidelines*. Impacts would be significant if the project would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### b. Impact Analysis

**Threshold 1:** Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

**Impact E-1 THE PROJECT WOULD NOT RESULT IN WASTEFUL OR UNNECESSARY ENERGY CONSUMPTION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

#### *Construction*

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require site preparation; grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod used to estimate construction air emissions. Table 4.6-3 presents the estimated construction phase energy consumption.

**Table 4.6-3 Project Construction Fuel Consumption**

Fuel Type <sup>1</sup>	Gallons	MBtu <sup>2</sup>
Diesel Fuel (Construction Equipment) <sup>1</sup>	45,352	5,781
Diesel Fuel (Vendor/Haul Trips) <sup>2</sup>	25,824	3,291
Other Petroleum Fuel (Worker Trips) <sup>3</sup>	22,229	2,440
<b>Total</b>	<b>93,404</b>	<b>11,512</b>

<sup>1</sup> Fuel demand rates for construction equipment, hauling and vendor trips, and worker trips are derived from CalEEMod outputs (Appendix C), trip generation rates calculated in the project Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L), fuel consumptions factors for construction vehicle engines (USEPA 2018), and fuel consumption data from the (United States Department of Transportation [U.S. DOT] 2019).

<sup>2</sup> CaRFG CA-GREET 3.0 fuel specification of 109,772 Btu/gallon used to identify conversion rate for fuel energy consumption for worker trips specified above. Low-sulfur Diesel CA-GREET 3.0 fuel specification of 127,460 Btu/gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above (Schremp 2017).

Notes: Totals may not add up precisely due to rounding.

The construction energy estimates are conservative because the equipment used in each phase of construction was assumed to be operating every day of construction (in reality, construction equipment would operate intermittently during the construction phase). Construction equipment would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

*Operation*

Operation of the project would increase area energy demand from greater electricity, natural gas, and gasoline consumption at a site with no previous development or uses. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project buildings. Gasoline and diesel fuel consumption would be attributed to the from vehicles trips generated by the project, and the majority of the fuel consumption would be from motor vehicles traveling to and from the project site. The estimated average number of daily trips associated with the project was used to determine the energy consumption associated with fuel use from the operation of the project.

Table 4.6-4 shows the estimated total annual fuel consumption of the project; with VMT estimated based on trip generation rates from the project’s Traffic and Circulation Study (Appendix L) and average regional trip lengths from CalEEMod; and with the assumed vehicle fleet mix obtained from CalEEMod (Appendix C). The project would also consume a negligible amount of diesel to fuel fire pumps.

**Table 4.6-4 Estimated Project Annual Transportation Energy Consumption**

<b>Vehicle Type<sup>1</sup></b>	<b>Percent of Vehicle Trips<sup>2</sup></b>	<b>Annual Vehicle Miles Traveled<sup>2</sup></b>	<b>Average Fuel Economy (miles/gallon)<sup>3</sup></b>	<b>Annual Fuel Consumption (gallons)</b>	<b>Total Fuel Consumption (MBtu)<sup>4</sup></b>
Passenger Cars	42.3	5,311,304	24	221,304	24,296
Light/Medium Trucks	49.9	6,257,150	17.4	359,606	45,835
Heavy Trucks/Other	7.8	982,243	7.4	132,735	16,918
<b>Total</b>	<b>100.0</b>	<b>12,550,697</b>	<b>–</b>	<b>713,645</b>	<b>80,750</b>

Notes: Totals may not add up due to rounding.

<sup>1</sup> Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in DOT fuel consumption data. Therefore, it was assumed that passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/other correspond to the single unit, 2-axle 6-tire or more class.

<sup>2</sup> Percent of vehicle trips from Table 4.4 “Fleet Mix” in Air Quality and Greenhouse Gas Analysis Memorandum (Appendix C).

<sup>3</sup> Average Fuel Economy (U.S. DOT 2019).

<sup>4</sup> CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for passenger cars and motorcycles (CARB 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for light/medium trucks and heavy trucks/other (Schremp 2017).

Operation of the proposed project would consume approximately 35.5 GWh of electricity per year. PG&E provided 78,088 GWh of electricity to its service area in 2019. The project would consume less than 0.05 percent of PG&E's annual electricity demand. Therefore, PG&E would have sufficient supplies for the project and the project would not place a significant demand on the electrical supply.

Estimated natural gas consumption for the project would be approximately 1,604,260 kBtu (or 0.016 MMthm) per year from general energy use and 11,544,000 kBtu (or 0.016 MMthm) per year for boilers. The project would also consume a negligible amount of compressed natural gas use to power forklifts. The project's natural gas demand would be served by SoCalGas, which provided 5,425 MMthm per year in 2019. The project would consume less than 0.003 percent of SoCalGas's natural gas demand. Therefore, SoCalGas would have sufficient supplies for the project and the project would not place a significant demand on the natural gas supply.

The project would comply with all building design standards set in CBC Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen (California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, nonresidential buildings built with the 2019 standards will use about 30 percent less energy due mainly to lighting upgrades (CEC 2018c). Furthermore, the project would further reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by PG&E continues to increase to comply with state requirements through (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

In conclusion, construction of the project would be temporary and typical of similar projects and would not result in wasteful use energy. Operation of the project would increase the use of electricity and natural gas on-site. However, the increase would be in conformance with the latest version of CALGreen and Building Energy Efficiency Standards. In addition, PG&E and SoCalGas have sufficient supplies to serve the project. Therefore, project operation would not result in wasteful or unnecessary energy consumption, and the operational impact related to energy consumption would be less than significant.

### **Mitigation Measures**

This impact would be less than significant, and no mitigation measures are required.

<b>Threshold 2:</b> Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
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**Impact E-2 THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The County's ECAP has a 2020 horizon and is based on statewide greenhouse gas emission reduction targets under AB 32 and Executive Order S-3-05. The 2015 ECAP is the most recently adopted ECAP and considers relevant, current Statewide goals for greenhouse gas emission reduction. As the

proposed project would be operational in 2022, the County's ECAP would not be applicable. The 2030 Climate Action Plan is currently being prepared and is anticipated to be complete in 2022.

As discussed in Section 4.6.2, Regulatory Setting, SB 100 mandates 100 percent clean electricity for California by 2045. Because the project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. Additionally, the building would also be subject to the latest energy efficiency standards pursuant to Title 24 requirements.

The project would comply with all applicable state energy conservation regulations, including Title 24 Building Energy Efficiency Standards and CALGreen, and would implement all required energy efficiency measures where applicable. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### **Mitigation Measures**

This impact would be less than significant, and no mitigation measures are required.

### **c. Cumulative Impacts**

Cumulative development in the northern part of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project. Cumulative development in Santa Maria and the surrounding area would increase demand for energy resources. However, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley regulations under AB 1493, and implementation of the SBCAG 2040 RTP/SCS would reduce VMT in the county. As a result of increasing energy-efficiency standards associated with electricity and natural gas consumption, water use and wastewater conveyance, and transportation, the combined increase in energy consumption in Santa Barbara County would not be expected to result in wasteful, inefficient, and unnecessary consumption of energy resources. Therefore, cumulative energy impacts would be adverse but less than significant.

The project would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen and would include energy-saving features that would reduce the potential for wasteful, inefficient, and unnecessary consumption of energy resources. Furthermore, as discussed under Impact E-2, the project would not conflict with the Santa Barbara County ECAP, which was adopted to reduce the cumulative impact of energy consumption in the County. Therefore, the project would not have a cumulatively considerable energy impact.

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## 4.7 Geology and Soils

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This section incorporates the findings of the *Geotechnical Investigation* conducted by Pacific Coast Testing, Inc. in April 2020 (Appendix F) and the *Ground Water Analysis* conducted by Katherman Exploration Co, LLC, last updated in October 2020 (Appendix I).

### 4.7.1 Environmental Setting

#### **a. Topography and Soils**

The Santa Maria Valley is located along the southern portion of the Coast Range province near the boundary within the Transverse Ranges geomorphic province of Southern California. The Santa Maria Valley is bounded between the Casmalia Hills to the south and the San Luis Range to the north. The Santa Maria basin is interpreted as a pull-apart structure from movement by the Little Pine-Foxen Canyon-Santa Maria River faults and the Santa Ynez fault. The Santa Maria Valley consists of greater than 200 feet of Quaternary age alluvial deposits underlain by Quaternary and Tertiary marine deposits (Santa Barbara County 2018). Locally, the project site is underlain by Saugus Formation (Qs) and alluvial deposits (Qoa) geologic units, derived of Quaternary sand deposits in coastal areas, including beach sand and eolian dunes, and older Quaternary alluvium and marine deposits, respectively (USGS 2020a).

The soils on the northern portion of the site consist of Pleasanton sandy loam and the soils on the southern portion of the site consist of Betteravia loamy sand (Natural Resources Conservation Service [NRCS] 2020c). The *Geotechnical Investigation* (Appendix F) found clayey sands, silty sands and sands near the ground surface, with sands and silty sands to a depth of 40 feet. Figure 4.7-1 illustrates the soils underlying the project site.

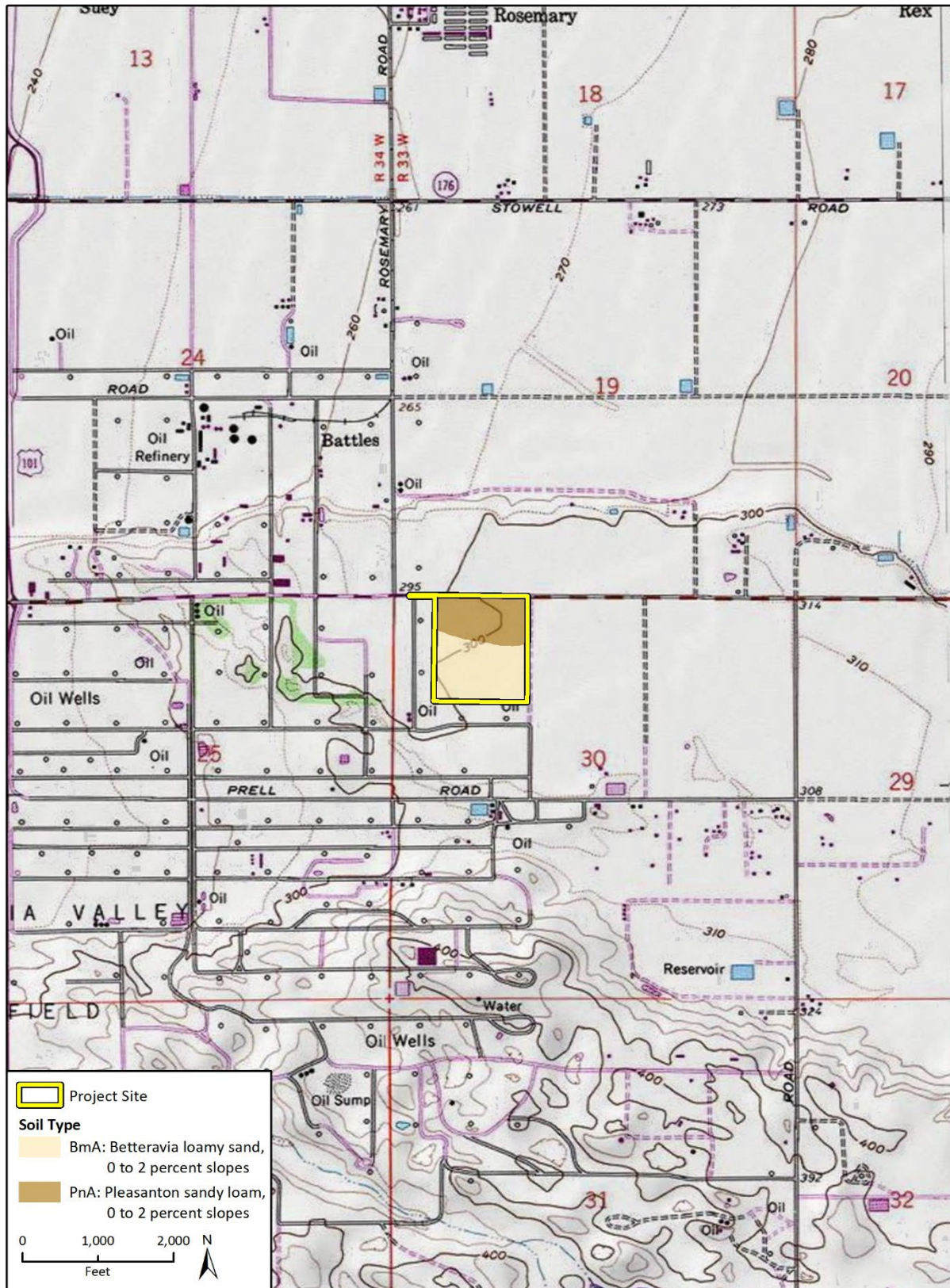
Project site topography consists of gentle slopes that reach 440 feet in elevation along the southwestern perimeter of the site, dropping to 300 feet in elevation at the northwest corner of the property (USGS 2018). The project site has a general downward slope from south to north. Surface drainage follows the topography to the north toward existing drainage ditches along Betteravia Road. Figure 4.7-1 illustrates the topography of the project site.

#### **b. Seismic and Other Soil Hazards**

Similar to much of California, the project site is located in a seismically active region. The Transverse Ranges are characterized by east-west trending structural features in contrast to the dominant northwest-southeast structural trend of California. Regional faults are depicted in the Seismic-Tectonic Map included in the County's Comprehensive Plan (Santa Barbara County 2015a).



Figure 4.7-1 Soils and Topography Map



Imagery provided by National Geographic Society, Esri, and their licensors © 2021. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

## **Fault Rupturing**

Seismically-induced ground rupture occurs as the result of differential movement across a fault. An earthquake occurs when seismic stress builds to the point where rocks rupture. As the rocks rupture, one side of a fault block moves relative to the other side. The resulting shock wave is the earthquake. If the rupture plane reaches the ground surface, ground rupture occurs. Active faults as defined by the State Geologist have been designated as Alquist-Priolo Fault Zones and require special regulation and study for projects proposed in these zones. Further discussion of the Alquist-Priolo Earthquake Fault Zoning Act is provided in the Regulatory Setting. According to the California Department of Conservation (DOC), the nearest Alquist-Priolo Earthquake Fault Zone is located approximately 16 miles southeast of the project site (DOC 2021).

No active faults are located on the project site or in the vicinity of the project site. The closest known active faults to the project site are the Los Alamos (14 miles to the south), San Gregorio-Hosgri (18 miles to the west), and San Andreas (39 miles to the east) faults (USGS 2020b). The closest known potentially active fault is the Bradley Canyon fault, approximately 2.5 miles east of the project site.

## **Groundshaking**

In addition to surface rupture, fault displacement can generate seismic groundshaking, which is the greatest cause of widespread damage in an earthquake. Whereas surface rupture affects a narrow area above an active fault, groundshaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. Many faults are mapped in the foothills of the Santa Ynez Mountains and coastal plains of Santa Barbara County with varying types, lengths, and ages. An active fault is one that shows evidence of displacement within the last 11,000 years (recent epoch). A fault which displaces deposits of late Pleistocene age (500,000 to 11,000 years) but with no evidence of recent movement is termed potentially active. Inactive faults are those that show evidence of displacement of rocks of early Pleistocene or older (500,000 years or older).

According to the County of Santa Barbara Seismic Safety and Safety Element, the site may experience moderate levels of ground shaking. In addition to damage to structural development, ground shaking can also cause seismic settlement and subsidence, lurch cracking, and lateral spreading. Similar to the surrounding areas, the project site may be affected by moderate to major earthquakes centered on one of the known active faults mentioned above. The San Andreas fault is the most likely active fault to produce groundshaking at the project site. However, the San Andreas Fault has a low probability of generating the highest ground accelerations at the project site as it is located more than 39 miles to the east (USGS 2020b). The peak ground acceleration for the site was estimated for a 2 percent probability of occurrence in 50 years. The likely magnitude for the site was estimated as 6.8 (Appendix F).

## **Liquefaction**

Liquefaction occurs when saturated cohesionless soils lose shear strength due to earthquake shaking. Ground motion from an earthquake may induce cyclic reversals of shear stresses of large amplitude. Lateral and vertical movement of the soil mass combined with the loss of bearing strength usually results from this phenomenon. Liquefaction potential of soil deposits during earthquake activity depends on soil type, void ratio, groundwater conditions, the duration of shaking, and confining pressures on the potentially liquefiable soil unit. Fine, poorly graded loose sand, shallow groundwater, high intensity earthquakes, and long duration of groundshaking are the principal factors leading to

liquefaction. The Santa Barbara County 2017 Multi-Jurisdictional Hazard Mitigation Plan indicates that the project site has a moderate severity rating for liquefaction (Santa Barbara County 2017a); however, the Geotechnical Investigation found a negligible potential for liquefaction on the site due to the typical groundwater depth exceeding 70 feet (Appendix F).

### **Subsidence**

Subsidence involves deep-seated settlement due to the withdrawal of fluid (oil, natural gas, or water). According to the Santa Barbara County Seismic Safety and Safety Element, there are no documented instances of subsidence in Santa Barbara County (Santa Barbara County 2015a). No oil or natural gas extraction activities currently take place on the project site; however, there are active oil operations approximately 0.5 mile north of the project site (Appendix I).

### **Lateral Spreading**

Lateral spreading typically occurs on gentle slopes and that have rapid fluid-like flow movement (USGS 2020c). Due to the near level terrain and the lack of liquefiable soil zones on the site, the potential for lateral spreading displacements is negligible (Appendix F).

### **Settlement and Compressible/Collapsible Soils**

Compressible soils typically consist of organic material and are common in estuaries and other areas where deposits of organic matter are found. Collapsible soils are typically low density, fine-grained, and dominantly granular, characteristic of loamy sands. Collapsible soils can settle under relatively low loads when saturated and can destroy foundations. The Santa Barbara County Seismic Safety and Safety Element describes the project site as having low potential for compressible/collapsible soils (Santa Barbara County 2015a).

### **Erosive Soils**

Soil erosion is the removal of soil by water and wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. The Santa Barbara County Comprehensive Plan Seismic Safety and Safety Element identifies most soils in the County as susceptible to erosion. However, susceptibility to erosion can be effectively controlled through engineering design and implementation of erosion control best management practices.

### **Expansive Soils**

Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. The sandy characteristics of the soils on the project site are not highly susceptible to expansive soil hazards. The Santa Barbara County Seismic Safety and Safety Element identifies the project site as having a low expansiveness potential (Santa Barbara County 2015a). Additionally, the clayey sands, silty sands and sands near the ground surface have low and very low expansivity (Appendix F).

### **Slope Stability/Landslides**

The Santa Barbara County Seismic Safety and Safety Element maps illustrating areas of slope stability/landslides, soil creep, and expansive soils indicate the site has a low potential for these types of soil hazards. Additionally, the project site is relatively flat and is not located adjacent to steep slopes

subject to landslide. The project site is located in near level terrain with gradients of less than five percent, and there was no visual evidence of overall instability at the site. The potential for slope movement or landslides on site is low to negligible (Appendix F).

### **c. Paleontological Sensitivity**

The project site is underlain by Saugus formation (Qs) and alluvial deposit (Qoa) geologic units, derived of Quaternary sand deposits in coastal areas, including beach sand and eolian dunes, and older Quaternary alluvium and marine deposits, respectively (USGS 2020a). Qoa deposits are considered to have a low paleontological sensitivity, as alluvial deposits are typically displaced or disrupted, and Qs deposits are considered to have a high paleontological sensitivity (Ventura County 2020).

## **4.7.2 Regulatory Setting**

### **a. Federal Regulations**

#### **Clean Water Act**

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs). The project site is within a watershed administered by the Central Coast RWQCB. Individual projects within the County that disturb more than one acre would be required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit).

The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing Best Management Practices (BMPs) the discharger would use to prevent and retain storm water runoff and to prevent soil erosion during construction. The County requires BMPs when Grading Permits and Land Use Permits are obtained.

### **b. State Regulations**

#### **California Building Code**

The California Building Code (CBC), Title 24, Part 2, provides building codes and standards for the design and construction of structures in California. The 2019 CBC is based on the 2018 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The CBC requires addressing soil-related hazards, such as treating hazardous soil conditions involving removal, proper fill selection, and compaction prior to construction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. The County is responsible for enforcing the CBC.

### **Alquist-Priolo Earthquake Fault Zoning Act**

The Alquist-Priolo Earthquake Fault Zoning Act was signed into law following the 1971 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

### **Seismic Hazards Mapping Act**

The Seismic Hazards Mapping Act directs the California Geological Survey to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by the California Geological Survey in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

### **California Public Resources Code**

Section 5097.5 of the California Public Resource Code (PRC) states “no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface” any “vertebrate paleontological site” on public lands without the “permission of the public agency having jurisdiction over such lands”. Violation of this section is a misdemeanor.

As used in this PRC section, “public lands” means lands owned by or under the jurisdiction of the State or any City, County, District, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

### **California Environmental Quality Act**

Paleontological resources are protected under the California Environmental Quality Act (CEQA), which states, in part, that a project will “normally” have a significant effect on the environment if it, among other things, will disrupt or adversely affect a paleontological site except as part of a scientific study. Specifically, in Appendix G of the State CEQA Guidelines the question is posed, “Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.” To determine the uniqueness of a given paleontological resource, it must first be identified or recovered. Therefore, mitigation of adverse impacts to the extent practicable to paleontological resources is mandated by CEQA.

## **c. Local Regulations**

### **Santa Barbara County Comprehensive Plan**

The Seismic Safety and Safety Element of the County’s Comprehensive Plan, amended in February 2015, is intended to guide land use planning with goals and policies to minimize the adverse effects

of hazards related to geology, seismicity, fires, and flooding. The following goals and policies are pertinent to the proposed project:

- Geologic and Seismic Goal 1, which expresses the County's intent to protect the community from risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, dam failure, mudslides and landslides, subsidence, liquefaction, and other seismic hazards.
- Geologic and Seismic Protection Policy 1, which requires the County to minimize the potential effects of geologic, soil, and seismic hazards through the development review process.
- Geologic and Seismic Protection Policy 2, which requires the County to refer to the California Building Code, the Land Use Development Code, County ordinances, the Coastal Land Use Plan, and the Comprehensive Plan when considering the siting and construction of structures in seismically hazardous areas.
- Geologic and Seismic Protection Policy 6, which encourages the County to reference the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives.

### **Santa Barbara County Code, Section 14-29**

Section 14-29 of the Santa Barbara County Code requires preparation and execution of an erosion and sediment control plan as part of grading plan requirements. The erosion and sediment control plan shall incorporate applicable County-approved best management practices. In lieu of such a plan, the County may accept a Stormwater Pollution Prevention Plan (SWPPP), if it contains the requirements of the County's erosion and sediment control Best Management Practices (BMP). During the rainy season no grading shall occur unless approved erosion and sediment control measures are implemented. Measures for non-storm water construction site discharge control shall be implemented year round.

## 4.7.3 Impact Analysis

### **a. Methodology and Significance Thresholds**

Appendix G of the CEQA Guidelines considers a project to have a significant geological impact if the project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
  - b. Strong seismic ground shaking;
  - c. Seismic-related ground failure, including liquefaction; and
  - d. Landslides.
2. Result in substantial soil erosion or the loss of topsoil;
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

**Arctic Cold Agricultural Processor and Freezer Project**

4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and/or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The project site is not located within an Alquist-Priolo fault zone. Therefore, no impacts would occur related to rupture of a known fault and the associated CEQA guidelines question is not discussed further in this section. There is negligible potential for liquefaction, landslide, lateral spreading, subsidence, liquefaction, collapse, or expansion to occur on the project site. Therefore, impacts related to these topics would be less than significant and the associated CEQA guidelines questions are not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a discussion of Checklist Questions 1a, 1c, 1d, 3 and 4.

Assessment of impacts is based on review of site information and conditions and County information regarding geologic issues. Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, impacts associated with geologic processes would be considered significant if:

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by the Planning and Development Department or the Public Works Department. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. Special Problem Areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development.
2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5:1 (horizontal to vertical).
3. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
4. The project is located on slopes exceeding 20 percent grade.

**Paleontological Resource Sensitivity**

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable. Such impacts have the potential to be significant and, under the CEQA guidelines, may require mitigation. Sensitivity is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The Society for Vertebrate Paleontology (SVP) outlines guidelines in its Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) for categorizing paleontological sensitivity of geologic units within a project area. The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrates or significant invertebrate fossils have been determined by previous studies to be present

or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon, diagnostically or stratigraphically, taxonomically, or regionally.

## **b. Project Impacts and Mitigation Measures**

**Threshold 1b:** Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

**Impact GEO-1 THE PROJECT WOULD NOT CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS INVOLVING STRONG SEISMIC GROUND SHAKING. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

As described in Section 4.7.1, Environmental Setting, the San Andreas Fault, a likely source of a major earthquake in California, is located approximately 39 miles east of the project site. The San Andreas Fault generally poses the greatest earthquake risk to California and is capable of producing a maximum credible earthquake of 8.0. The project is likely to experience a magnitude 6.8 earthquake with a peak ground acceleration of 0.513 (2 percent probability in 50 years) (Appendix F). These risks exist throughout the project site, regardless of development included under the project. Implementation of the project would increase employees, structural development, and infrastructure that would be exposed to these hazards. However, adherence to seismic design codes would reduce the potential for structural damage due to strong seismic shaking at the project site.

The most recent California Building Code (CBC) requirements and Santa Barbara County's Uniform Building Code ensure that new structures are engineered to withstand the expected ground acceleration at a given location, minimizing the risk to life and property from seismic hazards. To conform to the CBC, the proposed buildings on-site would be designed to withstand probable groundshaking that could result from nearby faults. Compliance with all applicable provisions of the California Building Code would ensure that impacts from groundshaking remain less than significant.

### **Mitigation Measures**

No mitigation measures are required because this impact would be less than significant.

**Threshold 2:** Would the project result in substantial soil erosion or the loss of topsoil?

**Impact GEO-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

Development of the project would require grading of the project site, including approximately 64,876 cubic yards (cy) of soil cut and 50,311 cy of soil fill, balancing out to approximately 14,565 cy net soil cut to be exported and disposed of off-site. Slopes would not exceed a ratio of 1.5:1 on completion of site grading, and no cut slope is proposed over 15 feet in height. This grading activity would result in temporary exposure of ground surfaces throughout the project site. The portion of the subject property that would be disturbed by the project is underlain by Pleasanton sandy loam (0 to 2 percent slopes) and Betteravia loamy sand (0 to 2 percent slopes). These soils are not designated as severely eroded, which indicates that rapid surface runoff rapid and high erosion hazards are not likely.

While the project would introduce 19.7 acres of new impervious surfaces to the project site, the project would also construct stormwater retention/infiltration infrastructure which would capture and process stormwater runoff. This feature would prevent excessive erosion or loss of topsoil that would be associated with the increase in impervious surfaces by preventing the stormwater runoff from traveling across undisturbed soils. The project would also include implementation of Source



Control BMPs to reduce erosion, which would include preservation of existing trees, shrubs, and groundcover and design of landscaping to minimize irrigation and runoff and promote infiltration.

Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the State Water Resources Control Board (SWRCB). Compliance with the NPDES permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require the development of a stormwater pollution prevention plan (SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

Additionally, a standard erosion and sediment control plan would be required, per Section 14-29 of the Santa Barbara County Code, that incorporates applicable County Best Management Practices to address and minimize sedimentation. Erosion of temporarily exposed soils could result in erosion-induced siltation of drainages on the project site. Impervious surfaces installed in the early stages of construction could concentrate water flow, leading to increased erosion and siltation of drainages.

Compliance with the County Code and NPDES permit and regulations, in addition to the project's proposed stormwater retention infrastructure, would ensure that the project would not substantially contribute to erosion or the loss of topsoil. Therefore, this impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required because this impact would be less than significant.

**Threshold 5:** Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**Impact GEO-3 THE PROJECT WOULD DISCHARGE WASTEWATER INTO AN ON-SITE PROCESSING BASIN. THE PROJECT WOULD BE REQUIRED TO COMPLY WITH COUNTY STANDARDS AND PERMITTING PROCEDURES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

As described in Section 2.5.10 of the Project Description, *Wastewater*, wastewater from the project site would be collected and treated on-site at a 100,000-square foot process wastewater basin in the eastern portion of the site (refer to Figure 2-3). The basin would infiltrate the water within 24 hours into site soils.

The NRCS Web Soil Survey provides ratings for disposal of wastewater by rapid infiltration, which is the closest classification to the proposed wastewater pond use. All soils on the project site are considered very limited for this disposal system, which typically means that the limitations cannot be overcome without major soil reclamation, special design, or expensive installation procedures (NRCS 2020).

Percolation tests conducted by Pacific Coast Testing, Inc. (2020) determined that the percolation rate ranged from 32 to 52 minutes per inch throughout the site. Per the Santa Barbara County Public Health Department Onsite Wastewater Treatment System (OWTS) guidelines (Santa Barbara County

2015b), limiting conditions would occur for percolation rates less than one minute per inch or greater than 120 minutes per inch. As the percolation rates on the project site fall within the range of 1 minute and 120 minutes, soils are considered to be suitable to accommodate the proposed wastewater basin. Additionally, the project site is not located in a “Special Problem Area” as identified by the County Board of Supervisors (Santa Barbara County 2020b). “Special Problem Areas” are intended to identify sites that may pose constraints on development from drainage, wastewater disposal, access road width, location and elevation, geologic and soil conditions, risk-of-injury, and the creation of a nuisance. The County requires three percolation tests be conducted in the area where wastewater is proposed for infiltration, the results of which the County Environmental Health Services (EHS) department will review as part of the application to construction the OWTS. The permitting process through EHS will ensure the proposed wastewater basin is designed and constructed consistent with the County’s applicable standards. Therefore, this impact would be less than significant regarding the soil suitability for the proposed on-site wastewater basin.

### **Mitigation Measures**

No mitigation measures are required because this impact would be less than significant.

**Threshold 6:** Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Impact GEO-4 THE PROJECT COULD DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE SITE OR UNIQUE GEOLOGIC FEATURE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.**

The project site is underlain by Qs and Qoa geologic units. As described in Section 4.7.1, Environmental Setting, Qoa deposits have a low paleontological sensitivity and Qs deposits have a high paleontological sensitivity. While there are no documented paleontological resources on the project site, ground-disturbing activities at the project site, including those associated with project construction, have the potential to disturb or destroy previously unidentified paleontological resources. The activities may include grading, excavation, drilling, or any other activity that disturbs the surface or subsurface geologic formations with a high paleontological sensitivity. Impacts to paleontological resources would be significant if construction activities result in the destruction, damage, or loss of scientifically important paleontological resources and associated stratigraphic and paleontological data.

Mitigation Measures GEO-1 and GEO-2 require the implementation of a worker environmental awareness program for paleontological resources, which would ensure contractors and employees can recognize potential paleontological resources uncovered during construction, and stopping work when unanticipated resources are discovered, which would protect unanticipated resources as they are discovered. Implementation of Mitigation Measures GEO-1 and GEO-2 would reduce potential impacts to paleontological resources to a less than significant level.

### **Mitigation Measures**

#### *GEO-1 Worker Environmental Awareness Program for Paleontological Resources*

A qualified paleontologist meeting Secretary of the Interior Standards shall develop a worker awareness program to educate all workers regarding the protection of any paleontological resources that may be discovered during project development, as well as appropriate procedures to enact

should paleontological resources be discovered. The qualified paleontologist shall develop appropriate training materials including a summary of geologic units present at the development site, potential paleontological resources that may be encountered during development, and worker attendance sheets to record workers' completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to project development, and as new employees are added to the project site workforce. The qualified paleontologist shall provide awareness session sign-in sheets documenting employee attendance to the County as requested.

**Plan Requirements and Timing.** The worker awareness program shall be reviewed and approved by Planning & Development prior to grading/building permit issuance. The Applicant shall provide Planning & Development compliance monitoring staff with the name and contact information for the qualified consultant prior to grading/building permit issuance and pre-construction meeting.

**Monitoring.** The Applicant shall demonstrate that the worker awareness program conforms to the required conditions.

#### *GEO-2 Paleontological Resources Inadvertently Discovered During Grading*

If any potentially significant paleontological resources are uncovered during ground disturbance or construction activities, the construction contractor, under the direction of the qualified paleontologist identified in Mitigation Measure GEO-1, shall:

- Temporarily cease grading within 50 feet of the finds and redirect activity elsewhere to ensure the preservation of the resource in which the discovery was made;
- Immediately notify the Santa Barbara County Planning and Development and Public Works Departments regarding the resource and redirected grading activity;
- Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by Santa Barbara County Planning and Development; and
- Complete all significance assessment and mitigation of impacts to the paleontological resource and verification reviewed and approved by Santa Barbara County Planning and Development prior to resuming grading in the area of the find.

Upon discovery of potentially significant paleontological resources and completion of the above measures, the Applicant shall submit to Santa Barbara County Planning and Development a report prepared by the qualified paleontologist documenting all actions taken.

**Plan Requirements and Timing.** This condition shall be printed on all building and grading plans.

**Monitoring.** Planning & Development compliance monitoring staff shall confirm monitoring by the qualified consultant and grading inspectors shall spot check field work.

### **Significance After Mitigation**

With incorporation of Mitigation Measures GEO-1 and GEO-2, the project would result in less than significant impacts to paleontological resources in the project area.

### **c. Cumulative Impacts**

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (*CEQA Guidelines*)

Section 15065[a][3]). The geographic scope for cumulative geology and soils impacts is limited to development sites in close proximity to the project site. This geographic scope is appropriate for geology and soils because geology and soils impacts such as erosion and loss of topsoil, can affect adjacent sites but do not impact regional areas as a whole. Adjacent development that is considered part of the cumulative analysis includes planned, pending, and reasonably foreseeable projects in northern Santa Barbara County, listed in Table 3-1 in Section 3, Environmental Setting.

Cumulative development in the project vicinity would gradually increase population and therefore gradually increase the number of people exposed to potential geological hazards, including effects associated with seismic events such as ground rupture, seismic shaking, liquefaction, landslides, and expansive soils. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Additionally, cumulative development projects would be required to conform with the current CBC, applicable local General Plans, and the County Municipal Code, as well as other laws and regulations mentioned above, ensuring that cumulative impacts associated with ground rupture, seismic shaking, liquefaction, and landslides would be less than significant. Potential cumulative impacts would be less than significant, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to seismic hazards.

Cumulative development would also increase ground disturbance in the vicinity of the project site, which would contribute to erosion and loss of topsoil in the area. However, cumulative development projects would be required to obtain coverage under the NPDES Construction General Permit and conform to the County Municipal Code. In compliance with these regulations, each construction project would be required to prepare a SWPPP and implement site-specific BMPs designed to reduce erosion. These standard requirements would ensure that cumulative impacts associated with erosion and loss of topsoil would be less than significant. Potential cumulative impacts would be less than significant, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to erosion and loss of topsoil.

The project would involve the installation of an alternative wastewater disposal system. Cumulative development in the County and near the project site would also be likely to construct alternative wastewater disposal systems or septic tanks. Projects in the County are required to obtain permits for OWTS and submit percolation tests that ensure soils are adequate for on-site wastewater disposal. Therefore, this cumulative impact would be less than significant, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to septic tanks or alternative wastewater disposal systems.

Cumulative projects would also increase the potential for impacts to paleontological resources through construction activities in the area. The project site has a high potential for buried paleontological resources, and the project would be required to implement Mitigation Measures GEO-1 and GEO-2 to reduce impacts of the project on paleontological resources to less than significant. It can be reasonably assumed similar measures would be taken for cumulative development projects. Therefore, although cumulative projects would result in significant cumulative impacts to paleontological resources, project-specific mitigation for cumulative development would limit this impact to less than significant, and implementation of Mitigation Measures GEO-1 and GEO-2 would ensure the project would not have a cumulatively considerable contribution to a significant cumulative impact related to paleontological resources.

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## 4.8 Greenhouse Gas Emissions

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The background information and analysis in this section is based partially on the *Air Quality and Greenhouse Gas Analysis Memorandum* prepared for the project by LSA Associates in January 2021 (Appendix C).

### 4.8.1 Environmental Setting

#### a. Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate changes continuously, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed substantial acceleration in the rate of warming during the past 150 years (Intergovernmental Panel on Climate Change [IPCC] 2014). The understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-twentieth century (IPCC 2014).

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxides (N<sub>2</sub>O), fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride (SF<sub>6</sub>). Water vapor is excluded from the list of GHGs because it only stays in the atmosphere for a short time and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Both natural processes and human activities emit GHGs. CO<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. CO<sub>2</sub> emissions are largely by-products of fossil fuel combustion, whereas CH<sub>4</sub> results from a variety of sources such as oil and gas production, fossil fuel combustion, and off gassing associated with agricultural practices and landfills. Observations of CO<sub>2</sub> concentrations, globally averaged temperature, and sea level rise are generally well within the range of the extent of the earlier IPCC projections. Recently observed increases in CH<sub>4</sub> and N<sub>2</sub>O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment used new projections of future climate change that have become more detailed as the models have become more advanced.

Manmade GHGs include fluorinated gases, (such as SF<sub>6</sub>) many of which have greater heat-absorption potential than CO<sub>2</sub>. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHG absorb different amounts of heat, a common reference gas (CO<sub>2</sub>) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as

“carbon dioxide equivalent” (CO<sub>2</sub>e), and is the amount of a GHG emitted multiplied by its GWP. CO<sub>2</sub> has a 100-year GWP of one. By contrast, CH<sub>4</sub> has a GWP of 25, meaning its global warming effect is 25 times greater than CO<sub>2</sub> on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth’s temperature. Without the natural heat trapping effect of GHGs, Earth’s surface would be about 93 degrees Fahrenheit (°F) cooler (California Environmental Protection Agency 2006). However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

## **b. Greenhouse Gas Inventory**

### **California**

Based on the California Air Resource Board’s (CARB) California GHG Inventory for 2000-2018, California produced 425.3 million metric tons (MMT, or gigatonne) of CO<sub>2</sub>e in 2018 (CARB 2020). Transportation is the major source of GHG emissions in California, contributing 40 percent of the state’s total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state’s GHG emissions, and electric power accounts for approximately 15 percent (CARB 2018a).

### **County of Santa Barbara Emissions Inventory**

The County of Santa Barbara conducted a GHG emissions inventory in 2007, which represents the baseline inventory, or existing conditions in the County. The inventory determined the County produced 1,192,970 metric tons (MT) CO<sub>2</sub>e in the baseline year of 2007. The major source of GHG emissions in the County are associated with transportation, which contributed 44 percent of the County’s total GHG emissions, followed by energy usage (residential and commercial combined), which contributed approximately 27 percent of the County’s emissions.

## **c. Potential Effects of Climate Change**

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21<sup>st</sup> century than were observed during the 20<sup>th</sup> century. Long-term trends have found that each of the past three decades have been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) for the decade from 2006 to 2015 was approximately 0.87°C (0.75°C to 0.99°C) higher than the average GMST over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations agree that LSAT and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014 and 2018).

According to *California’s Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snowpack, sea level rise, more

extreme heat days per year, more large forest fires, and more drought years (State of California 2018). While there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies (State of California 2018). Below is a summary of some of the potential effects that could be experienced in California and the Central Coast region as a result of climate change.

### **Air Quality**

Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Natural Resources Agency 2009).

### **Water Supply**

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast (State of California 2018). The Sierra snowpack provides the majority of California's water supply by accumulating snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack (DWR 2008; State of California 2018). The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

### **Hydrology and Sea Level Rise**

As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Climate change has the potential to induce substantial sea level



rise in the coming century (State of California 2018). The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 mm per year, which is double the observed 20<sup>th</sup> century trend of 1.6 mm per year (World Meteorological Organization [WMO] 2013). As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea-level rise of 10 to 37 inches by 2100 (IPCC 2018). A rise in sea levels could completely erode 31 to 67 percent of southern California beaches, result in flooding of approximately 370 miles of coastal highways during 100-year storm events, jeopardize California's water supply due to salt water intrusion, and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). In addition, increased CO<sub>2</sub> emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

## **Wildfire**

Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California 2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018). Many of the impacts identified above would impact ecosystems and wildlife in the Central Coast region. Increases in wildfire would further remove sensitive habitat; increased severity in droughts would potentially starve plants and animals of water; and sea level rise will affect sensitive coastal ecosystems.

## **Agriculture**

California has a \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2018). Higher CO<sub>2</sub> levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent; water demand could increase as hotter conditions lead to the loss of soil moisture; crop-yield could be threatened by water-induced stress and extreme heat waves; and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

## **Ecosystems and Wildlife**

Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century (State of California

2018). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

## 4.8.2 Regulatory Setting

### a. Federal Regulations

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) held that the United States Environmental Protection Agency (U.S. EPA) has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act (CAA). The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when CAA permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

### b. State Regulations

#### Assembly Bill 1493

AB 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of CAA preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

#### Assembly Bill 32

California's major initiative for reducing GHG emissions is outlined in AB 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codified the statewide goal of reducing GHG emissions to 1990 levels by 2020 and required CARB to prepare a Scoping Plan that outlined the main State strategies for reducing GHGs to meet the 2020 deadline. AB 32 required CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO<sub>2</sub>e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission

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reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted by the State since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

**Senate Bill 32**

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of policies, such as the State's Renewables Portfolio Standard (RPS) Program and SB 1383 (see below). The 2017 Scoping Plan also placed an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of 6 MT CO<sub>2</sub>e by 2030 and 2 MT CO<sub>2</sub>e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

**Senate Bill 100 and Senate Bill 350**

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's RPS Program, which was last updated by SB 350 in 2015. As amended, the State's RPS Program requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

**Senate Bill 97**

SB 97, signed in August 2007, acknowledged that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Natural Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

**Senate Bill 375**

SB 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations

(MPOs) to prepare a “sustainable communities strategy” (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Santa Barbara County Association of Governments (SBCAG) was assigned targets of a 13% reduction in GHGs from transportation sources by 2020 and a 17% reduction in GHGs from transportation sources by 2035. The SBCAG 2040 Regional Transportation Plan and Sustainable Communities Strategy (2040 RTP/SCS) demonstrated that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years.

### **Senate Bill 1383**

Adopted in September 2016, SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

### **Executive Order B-55-18**

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

### **California Building Code**

The California Code of Regulations, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. The California Building Code’s energy efficiency and green building standards are outlined below.

#### *Part 6 – Building Energy Efficiency Standards*

The California Code of Regulations, Title 24, Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for non-residential buildings to reduce California’s energy demand. The Building Energy Efficiency Standards are updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

The 2019 standards focus on these key areas: updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); nonresidential ventilation requirements; and nonresidential lighting requirements (CEC 2018d). Under the 2019 standards, nonresidential buildings would be 30 percent more energy efficient compared to the 2016 standards (CEC 2018d).

### *Part 11 – California Green Building Standards*

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Code). The 2016 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require the following practices:

1. 20 percent reduction in indoor water use relative to specified baseline levels
2. 50 percent construction/demolition waste diverted from landfills
3. Inspections of energy systems to ensure optimal working efficiency
4. Use of low pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards

The voluntary standards require the following:

1. Tier I—15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof
2. Tier II—30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, and 30 percent cement reduction, cool/solar reflective roof

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CALGreen water-reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

### **c. Local Regulations**

#### **County of Santa Barbara Energy and Climate Action Plan**

Adopted in July of 2015, the County's Energy and Climate Action Plan (CAP) sets a 2020 target to achieve a 15 percent reduction below 2007 community-wide emissions. The CAP also has a 2030 target that is derived based on the linear trajectory between the 2020 reduction target and the 2050 target established by Executive Order S-3- 05, which sets a 2030 target of 26 percent below 2020 levels. The CAP contains GHG reduction measures for building energy efficiency, renewable energy, on-road transportation use, water consumption, off-road transportation equipment, solid waste generation, and municipal measures to meet the GHG reduction targets.

The Santa Barbara County Board of Supervisors adopted the Energy and Climate Action Plan (ECAP) in May 2015. The ECAP contains objectives and policies that seek to reduce energy use in the County and to provide renewable energy sources. Applicable energy objectives and goals that relate to the project include:

- **III-1: Built Environment:** To foster development and renovations that increase energy efficiency through location, design, construction, and systems.
- **III-3: Community Choice Energy (CCE):** The CCE model puts energy purchasing and pricing options into the hands of local decision-makers and allows the community to determine what type of energy mix serves its needs.
- **III-7: Industrial Energy Efficiency:** To improve the efficiency of industrial sector energy uses and processes.
- **III-8: Agriculture:** To promote science-based and economically sound strategies to lower greenhouse gas emissions from agricultural production.

## **2040 Regional Transportation Plan**

SBCAG has incorporated a sustainable community strategy into its 2040 RTP/SCS, which is designed to help the region achieve its GHG emissions reduction target. The 2040 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. GHG reductions achieved through the 2040 RTP/SCS would result in corresponding reductions in energy consumption in the region. The 2040 RTP/SCS sets forth goals and objectives related to mixed-use development and the jobs-housing balance by allotting more jobs to the northern portion of Santa Barbara County.

### 4.8.3 Impact Analysis

#### **a. Methodology and Significance Thresholds**

##### **Methodology**

The Air Quality Analysis and Greenhouse Gas Analysis Memorandum for the proposed Arctic Cold Storage and Packaging Project was prepared by LSA Associates using methods and assumptions recommended in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (Appendix C) and peer reviewed by SBCAPCD and Rincon Consultants. GHG emission estimates were developed using CalEEMod (version 2016.3.2). These estimates reflect information provided by the project applicant and regionally-specific default parameters for projects in Santa Barbara County. The trip generation rates calculated in the project Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) were used as inputs in CalEEMod. See Appendix C for a detailed discussion of methodology and modeling assumptions.

Calculations of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O because these make up 98.9 percent of all GHG emissions by volume (IPCC 2014) and are the GHG emissions that the project would emit in the largest quantities. Emissions of all GHGs are converted into their equivalent GWP in terms of MT CO<sub>2</sub>e.

##### *Construction*

Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting

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the construction crew would produce combustion emissions from various sources. During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The proposed would include 64,876 cubic yards of cut and 50,311 cubic yards of fill. Therefore, the project would result in approximately 14,565 cubic yards of net export, which was included in CalEEMod. Other construction details were estimated using standard assumptions (e.g., construction fleet activities) from CalEEMod.

*Operation*

Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), off-road sources (e.g., forklifts), and stationary sources (e.g., fire pump and boiler).

Long-term operation emissions associated with the project were calculated using CalEEMod. The CalEEMod analysis assumed 449,248 square feet of “refrigerated warehouse-no rail” land use and a ~~496-space~~ approximately 200,000 square feet of parking lot area. In addition, total trip generation for the project was based on trip generation rates calculated in the project’s Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) and fleet mix obtained from CalEEMod (Appendix C). The project would generate approximately 1,380 average daily trips, with 1,168 employee trips and 212 truck trips. Trip lengths in CalEEMod were also revised based on the field truck/vans trip distribution percentage, estimated origin and designation, and the estimated average one-way trip length (Appendix C). Based on the total miles traveled and the field truck/vans trip distribution percentage, the average trip length was estimated to be 24.9 miles.

In addition, the estimated electricity demand associated with operation of the project is approximately 35.5 gigawatt-hours (GWh) per year, estimated using CalEEMod (Appendix C). The project’s estimated water demand of 257.7 acre-feet per year was used for CalEEMod modeling. Most of the equipment used for operation of the project would be electrically driven; however, the project would utilize four propane forklifts and diesel fire pumps, which were also included in CalEEMod. The analysis assumes the 351 horsepower (hp) diesel fire pump would be used 2 hours per day and up to 50 hours per year for maintenance and testing, consistent with the default operation limits for SBCACD permitting. Where project-specific data was not available, default assumptions from CalEEMod were used to estimate project emissions. The project would not add carbon dioxide to any of the operations within the facility and would not use diesel generators.

The project would also utilize five boilers to heat water for pasteurizers and evaporators for pasteurized products and puree concentrates. The five boilers would include four 100 hp Miura low-NO<sub>x</sub> boilers and one 300 hp Miura low-NO<sub>x</sub> boiler. All five boilers would be fueled by natural gas and would have a NO<sub>x</sub> rating as low as 9 parts per million. The four 100 hp Miura low-NO<sub>x</sub> boilers would each have a heat input rating of 3,939,000 British thermal units (BTU) and the 300 hp Miura low-NO<sub>x</sub> boiler would have a heat input rating of 11,544,000 BTU. The boilers would be used for 24 hours/6 days a week during the peak season (April through October) and 24 hours/5 days a week during the off-season (January through April). Emissions associated with the five boilers were calculated and added to the project operation emissions.

## Thresholds of Significance

Appendix G of the State CEQA Guidelines considers a project to have a significant impact related to greenhouse gas emissions if the project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Previous approaches to assess the significance of GHG emissions relied on tiering off the environmental review for the Santa Barbara County ECAP. However, as the Santa Barbara County ECAP has a 2020 horizon, this approach is no longer recommended.

On January 26, 2021, Santa Barbara County adopted new Interim GHG Emissions Thresholds of Significance (referred to herein as “Interim GHG Thresholds”), which are recommended for use until completion of the County’s 2030 Climate Action Plan.<sup>1</sup> The Interim GHG Thresholds recommend that land use projects be first assessed against a screening threshold of 300 MT CO<sub>2</sub>e. For projects that exceed the screening threshold, a service population threshold of 3.8 MT CO<sub>2</sub>e is recommended. Therefore, this analysis uses the County’s recommended service population threshold of 3.8 MT CO<sub>2</sub>e to assess the potential significance of project GHG emissions.

### b. Impact Analysis

**Threshold 1:** Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

**Impact GHG-1 PROJECT GHG EMISSIONS WOULD EXCEED THE COUNTY’S APPLICABLE INTERIM GREENHOUSE GAS EMISSIONS SIGNIFICANCE THRESHOLD. PROJECT GHG EMISSIONS WOULD BE REDUCED THROUGH COMPLIANCE WITH APPLICABLE LOCAL PROGRAMS, USE OF EFFICIENT TECHNOLOGY, AND IMPLEMENTATION OF APPROPRIATE REDUCTION MEASURES TO THE EXTENT FEASIBLE. HOWEVER, PROJECT GHG EMISSIONS WOULD REMAIN ABOVE THE COUNTY’S THRESHOLDS. THEREFORE, THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Following the methodology discussed above, construction-related GHG emissions as well as operation-related GHG emissions associated with area, energy, off-road, waste, and water sources were estimated using CalEEMod. During the non-harvest season (August to May, 9 months), the project would require approximately 153 employees. During the harvest season (May to August, 3 months) the project would require approximately 623 employees. Based on a time-weighted average, this is equivalent to 271 employees. Therefore, the project’s service population used for this analysis is 271.

Table 4.8-1 shows the estimated GHG emissions associated with the project.

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<sup>1</sup> The Interim GHG Thresholds of Significance state that “staff expects to complete the 2030 Climate Action Plan in 2022.”



**Table 4.8-1 Project Annual Equivalent GHG Emissions**

<b>Emission Source</b>	<b>Annual Emissions (MT CO<sub>2</sub>e)</b>
<b>Construction<sup>1</sup></b>	<b>30</b>
<b>Operational</b>	
Mobile	<del>9,224</del> <u>11,064</u>
Area	<1
Energy	5,234
Solid Waste	196
Water	119
Off-road	297
Stationary Equipment	12,764
<b>Total Project Emissions</b>	<b><del>27,864</del> <u>29,704</u></b>
Service Population	271
<b>Service Population Emissions Rate</b>	<b><del>102.8</del> <u>109.6</u> MT CO<sub>2</sub>e/SP</b>
Significance Threshold	3.8 MT CO <sub>2</sub> e/SP
<b>Threshold Exceeded?</b>	<b>Yes</b>

<sup>1</sup> Construction emissions were estimated to be 908 MT CO<sub>2</sub>e. Results were amortized over a 30-year period.

Source: Appendix C CalEEMod worksheets

As shown in Table 4.8-1, annual emissions from the project would be approximately ~~27,864~~ 29,704 MT CO<sub>2</sub>e, which would exceed the County’s screening threshold of 300 MT CO<sub>2</sub>e. On a per-service population basis, the project’s annual emissions would be approximately ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population (~~27,864~~ 29,704 MT CO<sub>2</sub>e / 271 service population), which would exceed the County’s significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Therefore, impacts from GHG emissions would be potentially significant.

### **Mitigation Measures**

The Air Quality Analysis and Greenhouse Gas Analysis Memorandum (Appendix C) evaluates the project’s GHG emissions using a sector-by-sector approach to identify potential GHG-reduction measures. The potential feasibility of specific GHG-reductions by sector is provided below for informational purposes to provide context for the specific components of Mitigation Measure GHG-1.

#### *Mobile Source Emissions*

The SBCAG 2040 RTP/SCS identifies that GHG emissions per capita from passenger vehicles are expected to decrease 13.3 percent in 2020 and 17.7 percent in 2035 from 2005 base year per capita emissions. As shown in Table 4.8-1, total operational mobile source emissions would be ~~9,224~~ 11,064 MT CO<sub>2</sub>e per year. Implementation of Mitigation Measure AQ-1 would reduce mobile source GHG emissions to the extent feasible. However, incoming produce would be transported by trucks owned by local growers and growers from other regions and Baja. The project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions

technologies as mitigation for the proposed project. The project applicant would be required to comply with CARB's air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and transportation refrigeration units. As described in Section 4.3, *Air Quality*, Mitigation Measure AQ-1 would reduce operational mobile source emissions to the extent feasible, including mobile source GHG emissions. Mitigation Measure GHG-1 includes additional transportation demand program measures that may be available to further reduce operational mobile source GHG emissions.

#### *Area Source Emissions*

As identified in Table 4.8-1, the project would generate less than 1 MT CO<sub>2</sub>e per year of area source GHG emissions. As a result, reductions in area source GHG emissions are not available that would achieve substantial additional GHG emissions reductions that would contribute to reducing the project's GHG emissions below the applicable threshold of significance.

#### *Energy Source Emissions*

The County's ECAP includes measures related to energy use with the goal of increasing energy efficiency and renewable energy. The project would be provided electricity through Pacific Gas and Electric (PG&E). Over 85 percent of PG&E's electricity comes from renewable and GHG-free resources. In addition, consistent with the Renewable Portfolio Standard mandate set forth by SB 100, PG&E will meet the 60 percent renewable energy goal by 2030 and will meet the 100 percent renewable energy goal by 2045. Therefore, the project would already procure energy from predominately renewable resources and would provide carbon-free electricity by 2045. In the interim, Mitigation Measure GHG-1 includes additional energy conservation and renewable energy measures that may be available to reduce the project's GHG emissions.

#### *Off-road Source Emissions*

The SBCAPCD 2020 Clean Air Grants for Off-Road Equipment Replacement program includes off-road heavy-duty equipment replacement, off-road heavy-duty engine re-power, marine engine re-power, and agricultural stationary engine re-power. The replacement of these heavy diesel engines aids in the reduction of air pollution. The project proposes to utilize four propane-powered forklifts, and no other heavy-duty off-road equipment. Because the project already proposes propane-powered off-road equipment rather than diesel-powered equipment, replacement of project off-road equipment would not achieve substantial additional GHG emissions reductions that would contribute to reducing the project's GHG emissions below the applicable threshold of significance.

#### *Waste Source Emissions*

The Santa Barbara County Municipal Code (Chapter 17, Article I, Section 17-12) requires the diversion of at least 50 percent of all waste generated. County Planning & Development has adopted the current CALGreen Building Standards, which increase the construction waste diversion goal to 65 percent. The project would be required to comply with these existing waste diversion regulations. Mitigation Measure GHG-1 includes additional waste-reduction measures that may be available to further reduce the project's waste source GHG emissions.

#### *Water Source Emissions*

The Santa Barbara County 2019 Integrated Regional Water Management (IRWM) Plan includes objectives and strategies to protect and conserve water supplies. The project would be required to

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comply with the latest Title 24 standards of the California Code of Regulations, which includes a variety of measures to reduce wastewater and water use. The project would also be required to comply with the California Model Water Efficient Landscape Ordinance and would include stormwater retention areas and basins. Finally, the project would result in the removal of approximately 40 acres of agricultural crop production, which would result in decreased water demand. Additional water conservation measures beyond those already required by the IRWM Plan and Title 24 standards are not available that would achieve substantial additional GHG emissions reductions that would contribute to reducing the project's GHG emissions below the applicable threshold of significance.

*Stationary Equipment*

The project's largest source of GHG emissions is stationary equipment. The project's proposed fire pumps would utilize the newest available technology and would include emissions controls that meet U.S. EPA emission standards for Tier 3 or interim Tier 4 engines and would therefore be more efficient than older equipment. The project's proposed boilers would be fueled by natural gas, which is more efficient and would result in fewer GHG emissions than diesel-powered or other liquefied petroleum gas technology. Electrically-powered boilers generate fewer GHG emissions at the source than natural gas-powered boilers; however, the CEC has does not recommend switching from natural gas to electric process boilers (CEC 2020), because under current conditions the potential GHG reduction at the source is offset by equal or greater off-site GHG emissions due to the time-dependent valuation of energy use of electric boilers (i.e. demand distribution throughout the day relative to the availability of renewable energy of resources). As a result, natural gas process boilers are currently the most efficient available technology. Because on-site project stationary equipment would use the latest and cleanest technology widely available, achieving significant additional mitigation of project stationary equipment may not be feasible.

*GHG-1 Greenhouse Gas Reduction Program*

The project applicant shall prepare and implement a Greenhouse Gas Reduction Program (GHGRP) that includes on-site GHG reduction measures to reduce the project's total remaining GHG emissions to 3.8 MT of CO<sub>2</sub>e per service person per year or less. Potential options include, but would not be limited to:

- Supply 100 percent of electricity from renewable energy resources. Options include opting into PG&E's Solar Choice (opting to supply 100 percent of annual energy usage) Program or PG&E's Regional Renewable Choice (opting to supply 100 percent of annual energy usage) Program.
- Implement a transportation demand program. Program measures may include free transit passes for employees, electric rideshare vehicles for employees, and construction of additional transit infrastructure at the project site.
- Implement a zero waste program or other feasible waste-reduction measures such as composting waste food scraps from employee activities and food waste processing.

After implementation of feasible on-site GHG reduction measures, the project applicant may also implement one of, or a combination of, the following off-site measures to achieve up to 50 percent of the total necessary GHG emission:

- Directly undertake or fund activities that reduce or sequester GHG emissions ("Direct Reduction Activities") and retire the associated "GHG Mitigation Reduction Credits." A "GHG Mitigation Reduction Credit" must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or

regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB's most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation* (CARB 2013). An "Approved Registry" is an accredited carbon registry that follows approved CARB Compliance Offset Protocols. As of April 2021, Approved Registries include American Carbon Registry, Climate Action Reserve, and Verra (CARB 2018b). Credits from other sources shall not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CARB standards. If the project applicant chooses to meet some of the GHG reduction requirements through Direct Reduction Activities, the activities shall be implemented as feasible in order of County preference: (1) within the County of Santa Barbara; (2) within the SBCAPCD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States. In the event that a project or program providing GHG Mitigation Reduction Credits to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring GHG Mitigation Reduction Credits specific to the registry involved and shall undertake additional direct investments to recoup the loss.

- Obtain and retire "Carbon Offsets." "Carbon Offset" shall mean an instrument issued by an Approved Registry and shall represent the past reduction or sequestration of 1 MT of CO<sub>2</sub>e achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4[c][3]). A "Carbon Offset" must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB's most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation* (CARB 2013). If the project applicant chooses to meet some of the GHG reduction requirements by purchasing offsets on an annual and permanent basis, the offsets shall be purchased according to the County of Santa Barbara's preference, which is, in order of County preference: (1) within the County of Santa Barbara; (2) within the SBCAPCD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States. In the event that a project or program providing offsets to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.
- No more than 50 percent of the project's total requisite emission reduction over the project's lifetime may be achieved through direct reduction activities and carbon offsets.

**Plan Requirements and Timing.** The applicant shall submit to Planning & Development the GHGRP for review and approval prior to final design approval. The GHGRP shall either reduce the project's emissions to 3.8 MT CO<sub>2</sub>e per service person per year or shall incorporate all feasible actions to reduce emissions associated with electricity demand, transportation, and waste generation and shall purchase 50 percent carbon offsets. Planning & Development shall verify that project plans incorporate required GHG emission reduction measures per the GGRP prior to final design approval. Each emission reduction measure shall include a commitment enforceable by Planning & Development.

**Monitoring.** Planning & Development compliance monitoring staff shall confirm inclusion of the required GHG emission reduction measures into the project Conditional Use Permit. Compliance with all components of the GHGRP shall be verified during construction and prior to issuance of a Certificate of Occupancy.

## Significance After Mitigation

Project GHG emissions from mobile, area, energy, off-road (forklifts), waste generation, water consumption, and stationary equipment would be reduced through compliance with applicable local programs, project use of efficient technology, and project implementation of appropriate reduction measures to the extent feasible such as through the measures of Mitigation Measure AQ-1 and Mitigation Measure GHG-1. Mitigation Measure GHG-1 provides the project applicant a menu of options for specific GHG reductions, including on-site reductions through the use of renewable electricity, and off-site reductions through purchasing off-site reduction credits or carbon offsets. Additional on-site GHG emissions reductions could be achieved through use of renewable electricity, implementation of a transportation demand program, zero waste program, and use of electric construction equipment. Nonetheless, achieving the additional GHG reduction necessary to reduce the project's annual ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population GHG emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population would not be feasible. Quantifying potential reductions from these additional GHG reduction measures would be speculative due to uncertainty regarding the implementation of such measures. For example, without knowing the specific transportation policies that would be included in a transportation demand management program, or employees' response and engagement with the program, an accurate GHG emission reduction cannot be estimated. Similarly, the use of electric-powered construction equipment would be dependent on the availability of such equipment for project construction. Therefore, the on-site GHG reduction measures identified in Mitigation Measure GHG-1 have not been quantified to provide a conservative estimate of feasible on-site GHG emissions reductions. In addition, with the cap placed on the use of off-site measures such as reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), a 50 percent reduction from the project's ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population would not reduce emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population.

As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable by the project, as well as the magnitude of the project's exceedance of the County's adopted GHG emissions threshold (~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population as compared to the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population), and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), it is not possible to demonstrate that Mitigation Measure GHG-1 could feasibly reduce the project's emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service person per year. Therefore, the project's impact from GHG emissions would remain significant and unavoidable.

**Threshold 2:** Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Impact GHG-2 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS THAT ARE ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

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### *Santa Barbara County ECAP*

The County's ECAP is intended to streamline environmental review of projects within the unincorporated County consistent with the State *CEQA Guidelines*; however, the County's ECAP used a 2020 horizon and is based on Statewide emission reduction targets under AB 32 and Executive Order S-3-05. As the project would be operational in 2022, the County's ECAP would not be applicable.

### *2040 Regional Transportation Plan*

SBCAG has incorporated a sustainable community strategy into its 2040 RTP/SCS, which is designed to help the region achieve its SB 375 GHG emissions reduction target. The 2040 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The RTP/SCS sets forth goals and objectives related to mixed-use development and the jobs-housing balance by allotting more jobs to the northern portion of Santa Barbara County. The project does not include new residential development and therefore would not increase population projections. In addition, the project would create job opportunities within the northern portion of the County to increase the jobs-housing ratio. Therefore, the project would be consistent with the goals of the 2040 RTP/SCS.

### *State Scoping Plan*

Absent any other local or regional climate action plan, the project was analyzed for consistency with the CARB Scoping Plan measures. The Scoping Plan measures applicable to the project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

#### **ENERGY EFFICIENCY**

Energy efficient measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, the project would comply with the latest Title 24 standards of the California Code of Regulations regarding energy conservation and green building standards. Therefore, the project would not conflict with applicable energy efficiency measures.

#### **WATER CONSERVATION AND EFFICIENCY**

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest Title 24 standards of the California Code of Regulations, which includes reduction of wastewater and water use. In addition, the project would be required to comply with the California Model Water Efficient Landscape Ordinance and would include stormwater retention areas and basins. Therefore, the project would not conflict with applicable water conservation and efficiency measures.

#### **SUSTAINABLE TRANSPORTATION**

The goal of transportation and motor vehicle Scoping Plan measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the project would not conflict with applicable transportation and motor vehicle measures.

## **Mitigation Measures**

This impact would be less than significant, and no mitigation measures are required. In addition, Mitigation Measure AQ-1 would require that the project incorporate sustainable transportation technologies and practices appropriate for the proposed use. As the project includes a substantial number of heavy-truck trips over long distances, Mitigation Measure AQ-1 requires multiple measures to reduce emissions associated with heavy trucks and associated transport refrigeration units (TRU). These include installation electrical hookup equipment for TRUs at all loading docks, requiring the use of newer (model year 2014 or newer) heavy duty trucks to accelerate transition to more efficient vehicles, and practices limiting truck idling and TRU run-time.

### **c. Cumulative Impacts**

Because climate change is the result of collective of human actions taking place throughout the world, it is quintessentially a global or cumulative impact. As discussed in Section 4.8.3(b), Impact Analysis, project GHG emissions would exceed the County's adopted GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population, even after the implementation of Mitigation Measure AQ-1 and Mitigation Measure GHG-1. Therefore, the project's contribution to the cumulative GHG impact would be significant and unavoidable.

## 4.9 Hazards and Hazardous Materials

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The background information and analysis in this section is based partially on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the project by Buena Resources, Inc. in March 2019, the *Ag Sampling and Surface Soils* prepared for the project by Buena Resources, Inc. in October 2020, the *Soil Gas Assessment Activities* letter report prepared for the project by Padre Associates, Inc. in December 2020, and the *Refrigeration Hazard Assessment Report for Permit Purposes* prepared for the project by Applied Process Cooling Corporation (APCCO). These documents are included in Appendix G.

### 4.9.1 Environmental Setting

#### a. Overview of Subject Property

The 109-acre subject property is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). Refer to Figure 2-2 in Chapter 2, Project Description, of this EIR for the boundaries of the subject property. The subject property is surrounded in all directions by agricultural uses, including row crops and Central City Cooling across Betteravia Road to the north, as well as row crops to the east, south, and west. The planned limits of ground disturbance for the proposed new processor and freezer facilities (“project site”) cover approximately 40 acres on the northeast portion of the subject property.

The Phase I ESA prepared for the project included review of aerial photographs. The 1938 aerial shows the site as undeveloped. The 1943-1954 aerials show the historic on-site petroleum well operations, which were part of the Vincent B Oil and Gas Lease, Tract No. 5, of the Santa Maria Valley Oil and Gas Field. A building located at the site of the existing cooling facility on the subject property was visible on the 1967 and 1976 aerials. The existing cooling plant was visible on aerials after 2003.

A propane tank and a fuel tank are located along the northern boundary of the existing cooling plant on the southern portion of the subject property. Two pole-mounted transformers and a pad-mounted transformer are located near the cooling plant building. A metal building is located on the subject property immediately south of the cooling plant which is used by Valley Farm Supply, which handles organic and inorganic fertilizer in bulk. Fertilizers are stored in approximately 60 poly tanks to the north, east, and south of the metal building. According to the Phase I ESA prepared for the project, no hazardous materials or wastes are generated by the existing cooling plant or farm supply operations on the subject property.

There are 10 existing petroleum wells on the subject property. Of these existing wells, eight were plugged and abandoned between 1962 and 1985 and two are classified as idle. Three of the abandoned wells are located on the 40-acre project site, with the remaining seven wells located off site. An abandoned petroleum transmission line also runs through the subject property from the northwest corner to the southwest corner, crossing the southwestern portion of the 40-acre project site.

Two existing groundwater wells located on the subject property supply water for agricultural purposes. Additionally, two approximately 1,000-gallon poly water tanks feed water to the existing cooling plant from one of the groundwater wells. Wastewater from the cooling plant is directed to an on-site septic tank.



## **b. Known Hazardous Materials Sites**

A regulatory database search was conducted to identify hazardous waste sites on and within 0.5 mile of the subject property (refer to Section 4.9.3[a], Methodology and Significance Thresholds, for additional detail). The GeoSearch database identified five hazardous waste sites within 0.5 mile of the subject property. Two of these five hazardous waste sites identified were on or within 0.25 mile of the subject property: (1) the Vincent B Lease on the subject property which was listed on the GeoTracker Cleanup Database and (2) the petroleum above ground storage tank (AST) on the Central City Cooling property located at 1701 E. Betteravia Road just north of the subject property which was listed on the Above Ground Storage Tank (ABST) database. The sites listed in the GeoSearch database are listed in Table 4.9-1. Additionally, GeoTracker lists four Irrigated Lands Sites located on the subject property. Irrigated Lands Sites are sites with agricultural discharge regulated under the State Water Resources Control Board's (SWRCB's) Irrigated Lands Regulatory Program. The Unocal Vincent B Lease Investigation and Remediation Report which was prepared in September 2014 for Chevron Environmental Management Company for the subject property was also listed in GeoTracker.

## **c. Recognized Environmental Concerns**

The Phase I ESA identified the past unauthorized release from the petroleum wells, sumps, pipelines and other facilities associated with the Unocal Vincent B Lease oil field as a Potential Environmental Concern on the subject property. There are no spills reported from the Central City Cooling AST and that site was not identified as a Potential Environmental Concern in the Phase I ESA. The Phase I ESA determined the three sites within 0.5 mile of the subject property did pose a risk to the project due to their distance and/or location. The Unocal Vincent B Lease site is discussed further below.

### **Unocal Vincent B Lease**

Chevron Management Company has cleanup responsibility for the Unocal Vincent B Lease oil field facilities. Site assessment and restoration activities were performed at the subject property as part of Chevron's voluntary restoration program for its Santa Maria Valley Unit liabilities between 1998 and 2008. These previous assessment and restoration activities were limited to the sump features associated with the wells and tank batteries and miscellaneous debris pits. Several reports documenting these activities, along with requests for closure, were submitted to the lead oversight agency at that time, the San Bernardino County Fire Protection District (SBCFPD). Pursuant to those closure requests, SBCFPD issued No Further Action determinations in 2008 for the sump features associated with petroleum wells and tank batteries. In a letter dated June 4, 2009, SBCFPD directed Chevron to prepare and submit a site assessment work plan to assess wellheads, former tank battery AST locations, and pipeline corridors on the subject property by September 4, 2009. In 2014, a Site Assessment Workplan for the wellheads, former tank battery ASTs, and oilfield pipelines on the subject property was approved by Environmental Health Services (the current oversight agency for clean-up activities on the subject property related to the Unocal Vincent B Lease case). Based on County correspondence with Chevron, the soil sampling was reportedly conducted in 2015; however, the findings were not consolidated into a report or submitted to SBCFPD. A No Further Action determination has not been issued for the petroleum wellheads and the case has not been closed. As discussed in further detail in Section 4.9.3, the Project would be required to obtain a No Further Action determination for the petroleum wells on the project site prior.

**Table 4.9-1 Hazardous Waste Sites within 0.5 mi of Project Site**

Site Number	Site Name and Address	Database	Distance from Project Site	Relative Elevation to Project Site (Elevation)	Status
1	Mid Coast Cooling 1750 East Betteravia Road Santa Maria, CA 93454	FRSCA SBHWF	0 ft (on subject property)	Same (304 ft)	Active (no reported incidents)
2	Central City Cooling 1701 E Betteravia Road Santa Maria, CA 93454	ABST	0.238 mi north	Lower (302 ft)	Active (no reported incidents)
3	Unical Battles Lease; Unocal Sunray Bradley; and Unocal Vincent B Wellheads and ASTs Betteravia Road at Rosemary Road Santa Maria, CA 93455	CLEANUP SITES	0.288 mi northwest	Lower (298 ft)	Open Total petroleum hydrocarbon leak discovered, reported, and stopped (1/1/50) Leak reported (4/15/08) Staff letter and Preliminary Site Assessment Workplan in (September 2014) Site visit/ inspection/ sampling (July and August 2015)
4	Former Unocal Signal Lease 1975 Prell Road Santa Maria, CA 93455	CLEANUP SITES	0.394 mi east	Higher (301 ft)	Closure/No Further Action Letter (4/26/20)
5	Unocal Signal Hopkins Lease; Unocal Wylie Lease Santa Maria, CA 93454	CLEANUP SITES	0.431 mi south-southwest	Lower (301 ft)	Open-Active Leak discovered, reported, and stopped (1/1/50) Site Assessment Report, Remedial Action Plan, other reporting (June 2007 to 2008) Closure/No Further Action Letter (March 2009) Cost Recovery Agreement/Notice of Reimbursement (6/3/10)

ft = ft

mi = miles

ABST = Above Ground Storage Tanks

CLEANUPSITES = GeoTracker Cleanup Sites

FRSCA = Facility Registry System

SBHWF = Santa Barbara County Hazardous Waste Facilities

## **On-Site Soils**

Due to the presence of plugged and idle petroleum wells on the property, there is a potential for petroleum hydrocarbons and volatile organic compounds to be present in on-site soil and for methane to be present in soil vapor. The previous assessment and restoration activities did not address potential petroleum hydrocarbon impacts associated with the wellheads and oilfield pipeline; therefore, a soil gas assessment was conducted to test for volatile organic compounds (VOCs) and methane as described in Section 4.9.3(a), Methodology and Significance Thresholds. Ten VOC constituents were detected in all samples collected; however, they did not exceed the California Human Health Screening Levels (CCHLSs)<sup>1</sup> for commercial/industrial sites. Methane was not detected in any of the soil gas samples.

Because of the past agricultural uses on the property, there is a potential for pesticides and arsenic to be present in on-site soils. Therefore, soil sampling was conducted for organic chlorinated pesticides and arsenic on the 40-acre project site, as described in Section 4.9.3(a), Methodology and Significance Thresholds. Pesticides were below the detection limit, with the exception of 4',4'-dichlorodiphenyldichloroethylene (DDE) which was detected in all samples at concentrations ranging from 0.0059 milligrams/kilogram (mg/kg) to 0.013 mg/kg. However, this is below the CCHL of 6.3 mg/kg for commercial/industrial sites. Arsenic in samples collected in September 2020 ranged from 1.5 mg/kg to 2.0 mg/kg, which is below the 12 mg/kg action level specified in the State's Interim Guidance Document for Arsenic. Arsenic in samples collected in October 2020 were all below the method detection limit of 0.92 mg/kg.

## 4.9.2 Regulatory Setting

### **a. Federal Regulations**

#### **Occupational Safety and Health Act**

Created by the Occupational Safety and Health Act of 1970 (Title 29 CFR), Occupational Safety and Health Administration (OSHA) is the federal agency responsible for ensuring worker safety. OSHA regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling (OSHA 2020a).

#### **Toxic Substances Control Act**

The Toxic Substances Control Act was passed by the United States Congress in 1976 and is administered by the Environmental Protection Agency (EPA) to regulate the introduction of new or already existing chemicals. Under the Toxic Substances Control Act, the U.S. EPA evaluates potential risks from new and existing chemicals and acts to address any unreasonable risks chemicals may have on human health and the environment (EPA 2020b). The Federal Toxic Substances Control Act provides U.S. EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures (EPA 2020c).

#### **Resource Conservation and Recovery Act**

The Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of

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<sup>1</sup> CCHLS are concentrations of chemicals in soil or soil vapor below thresholds of concern for risk to human health, specifically a lifetime cancer risk of one in a million.

hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act (EPA 2020d).

### **Comprehensive Environmental Response, Compensation and Liability Act**

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) was enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act in 1986. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List (EPA 2020e).

### **Process Safety Management Standard**

The OSHA Process Safety Management Standard (29 CFR 1910.119) includes requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals for general industry and construction. Requirements of this standard include providing employees with information pertaining to hazardous chemicals, training employees on the operation of equipment with hazardous materials, and employer requirements to perform a process hazard analysis (OSHA 2020b).

### **National Incident Management System**

The National Incident Management System (NIMS) provides a systematic, proactive approach to guide government agencies, nongovernmental organizations, and the private sector to work together to prevent, report to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property harm to the environment. The County participates in NIMS, which improves its ability to prepare for and respond to potential incidents and hazard scenarios (FEMA 2020).

### **Hazardous Materials Transportation Uniform Safety Act**

The U.S. Department of Transportation regulates hazardous materials transportation on all interstate roads pursuant to its authority under the Hazardous Materials Transportation Uniform Safety Act of 1990 (49 United States Code §5101 et seq.). In California, the California Department of Transportation (Caltrans) and California Highway Patrol enforce federal law. Together, these agencies determine driver training requirements, load labeling procedures, and container specifications (OSHA 2020c).

## **b. State Regulations**

### **Hazardous Waste Control Law**

The Department of Toxic Substance Control (DTSC), a department of the California EPA, is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in

**Arctic Cold Agricultural Processor and Freezer Project**

California primarily under the authority of RCRA and the California Health and Safety Code. DTSC also administers the California Hazardous Waste Control Law (California Health and Safety Code §§ 25100, et seq.) to regulate hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than RCRA, until the U.S. EPA approves the California program, both state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

**Government Code Section 65962.5**

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included. If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations (CCR). Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

**Cal OSHA Title 8**

Pursuant to the requirements of OSHA Title 8, employers must develop site-specific Health and Safety Plans. Workers potentially exposed to hazardous materials in their workplace must be trained so that they are aware of the hazards and provided necessary protection from the hazardous materials.

**Hazardous Material Release Response Plans and Inventory Law**

California Health and Safety Code, Chapter 6.95, and Title 19 CCR, Division 2, Chapter 4 require businesses to develop a Release Response Plan for hazardous materials emergencies if they handle more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials. In addition, the business must prepare a Hazardous Materials Inventory of all hazardous materials stored or handled at the facility over the above thresholds. Also, all hazardous materials must be stored in a safe manner. Both the Release Response Plan and the Hazardous Materials Inventory must be supplied to the Certified Unified Program Agency (CUPA) for the program. For the project site, the CUPA is the Santa Barbara County Department of Environmental Health Services, Hazardous Materials Unit. There are specific regulations for accidental release prevention codified under CCR Title-19, Division-2, Chapter-4-5 for flammable and toxic chemicals that are highly prescriptive and are coupled with the aforementioned OSHA process safety regulations.

## **California Accidental Release Prevention Program**

The California Accidental Release Prevention Program (CalARP) was established on January 1, 1997 (CCR, Division 2, Chapter 4.5). The main objective of the CalARP program is to prevent accidental releases of regulated substances determined to potentially pose the greatest risk of immediate harm to the public and the environment, and to minimize the consequences if releases do occur. Regulated substances include both flammable and toxic hazardous materials listed on the Federal Regulated Substances for Accidental Release Prevention and on the State of California Regulated Substances lists. Businesses that handle regulated substances in industrial processes above threshold quantity levels are subject to CalARP program requirements. The CalARP program requires businesses to implement accident prevention programs, which can include preparation and implementation of Risk Management Plans, intended to minimize the possibility of an accidental reduce the consequences if an accidental release were to occur.

## **Hazardous Waste Management**

Waste that is toxic, corrosive, flammable, or reactive must be handled, stored, transported, and disposed of in accordance with the regulations in California Health and Safety Code, Division 20, Chapter 6.5 and CCR, Title 22, Division 4.5, which are more stringent than federal regulations.

## **California Fire Code**

To minimize risks to public health and the environment, a Fire Prevention Inspector reviews the list of hazardous materials stored above ground on a property to assess potential individual and/or cumulative impacts to the property and surrounding areas. The inspector ensures that hazardous materials stored onsite are in compliance with Chapter 6.95 of the California Health and Safety Code. The fire code provides uniform fire prevention, hazardous material, and building construction regulations.

## **Geologic Energy Management Division**

State of California Geologic Energy Management Division (CalGEM, previously known as the Division of Oil, Gas, and Geothermal Resources Regulatory Program [DOGGR]), supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells throughout the State. The regulatory program set forth by CalGEM for the management of these resources emphasizes the appropriate development of oil, natural gas, and geothermal resources in the State through sound engineering practices that protect the environment, prevent pollution, and ensure public safety (CalGEM 2020).

### **c. Local Regulations**

#### **Santa Barbara Operational Area Emergency Management Plan**

The County of Santa Barbara Office of Emergency Management prepared the 2013 Santa Barbara Operational Area Emergency Management Plan to address the County's planned response to large-scale emergency situations and disasters. The plan establishes actions, policies, and procedures to be implemented by the County in preparation for and in response to emergencies and disasters.

## Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Federal Emergency Management Agency (FEMA) requires local governments to prepare and maintain a Hazard Mitigation Plan. The County of Santa Barbara and cities of Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang, in coordination with the State of California Governor's Office of Emergency Services (CalOES) and FEMA, developed the 2017 Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (Santa Barbara County 2017a). This plan guides disaster preparedness in the County and Cities and specifies the actions that the jurisdictions plan to follow to reduce vulnerability and exposure to hazards.

### 4.9.3 Impact Analysis

#### a. Methodology and Significance Thresholds

##### Methodology

A Phase I ESA was conducted for the subject property by Buena Resources, Inc. in accordance with ASTM International E1527-13 standards. The Phase I ESA included review of geology and hydrology, past and present land uses, and aerial photographs of the subject property, interviews of individuals familiar with the property, site reconnaissance, and review of federal, state, regional, and local databases, including GeoSearch and GeoTracker databases searches. Refer to the *Phase I Environmental Site Assessment* (Buena Resources, Inc. March 2019) in Appendix G.

Agricultural sampling of the surface soils on the 40-acre project site for organic chlorinated pesticides and arsenic was conducted by Buena Resources, Inc. on September 14, 2020. Samples consisted of composite samples collected at 13 locations and one duplicate sample. Each composite sample was comprised of three samples collected at depths from 0 to 6 inches. Additional sampling for arsenic was conducted on October 1, 2020 to collect a discrete (i.e., not composited) sample at each of the 13 locations, plus one duplicate. Refer to the *Ag Sampling and Surface Soils* (Buena Resources, Inc. October 2020) in Appendix G.

A soil gas assessment was conducted on the subject property on November 25, 2020 by Padre Associates, Inc. Four holes were drilled to depths of approximately 15 feet below ground surface (bgs) to monitor for soil gas at 5 and 15 feet bgs. Eight soil gas samples and one duplicate sample were analyzed for VOCs and methane. Refer to the *Soil Gas Assessment Activities* letter-report (Padre Associates, Inc. December 2020) in Appendix G.

The *Refrigeration Hazard Assessment Report for Permit Purposes* was prepared for the project, which includes a quantitative analysis of public risks of injury and fatality in the event of accidental release of anhydrous ammonia during operation of the proposed agricultural processing and freezer facility. Dispersion modeling was conducted pursuant to EPA guidelines to estimate the threat zone, which is the area where an accidental release of anhydrous ammonia would exceed the toxicity endpoint of 200 parts per million (ppm) defined by the EPA. The toxicity endpoint is the concentration where serious injuries from short-term exposures would no longer occur. The analysis also considered an endpoint of 1,100 ppm which is the concentration where there is a rare possibility of fatality occurring. The analysis considered multiple release scenarios, including a worst-case release scenario. Refer to the *Refrigeration Hazard Assessment Report for Permit Purposes* (APCCO) in Appendix G.

## **Significance Thresholds**

Appendix G of the State CEQA guidelines considers a project to have a significant impact related to hydrology and water quality if the project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.
4. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. Result in a safety hazard or excessive noise for people residing or working in the project area for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The project site is not located within 0.25 mile of an existing or proposed school, or within an airport land use plan or Airport Area of Influence (AIA), or within two miles of a public airport or public use airport. Therefore, there would be no impacts associated with these issues and the associated State CEQA Guidelines questions (Checklist Questions 3 and 5) are not discussed further in this section.

Construction of new agricultural structures on the project site would not impair implementation of, or physically interfere with the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, which describes County emergency response and evacuation procedures. Additionally, the project would comply with applicable Santa Barbara County Fire Department specifications and Chapter 5 of the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures. The project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the associated State CEQA Guidelines question (Checklist Question 6) is not discussed further in this section.

The project site and surrounding properties are not located in a high, or very high fire hazard severity zone and do not contain wildlands, forests, or dense vegetation that pose wildfire risk. The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, the associated State CEQA Guidelines question (Checklist Question 7) is not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a discussion of Checklist Questions 3, 5, 6, and 7.

The Santa Barbara County Environmental Thresholds and Guidelines Manual includes thresholds for hazards and hazardous materials impacts to public safety. These thresholds are applicable to the multiple types of projects that involve the use, storage, or transport of acutely hazardous materials or are within facilities that involve such use and pose a potentially significant risk to public safety due to exposure to hazardous materials. The following threshold is applicable to the project:



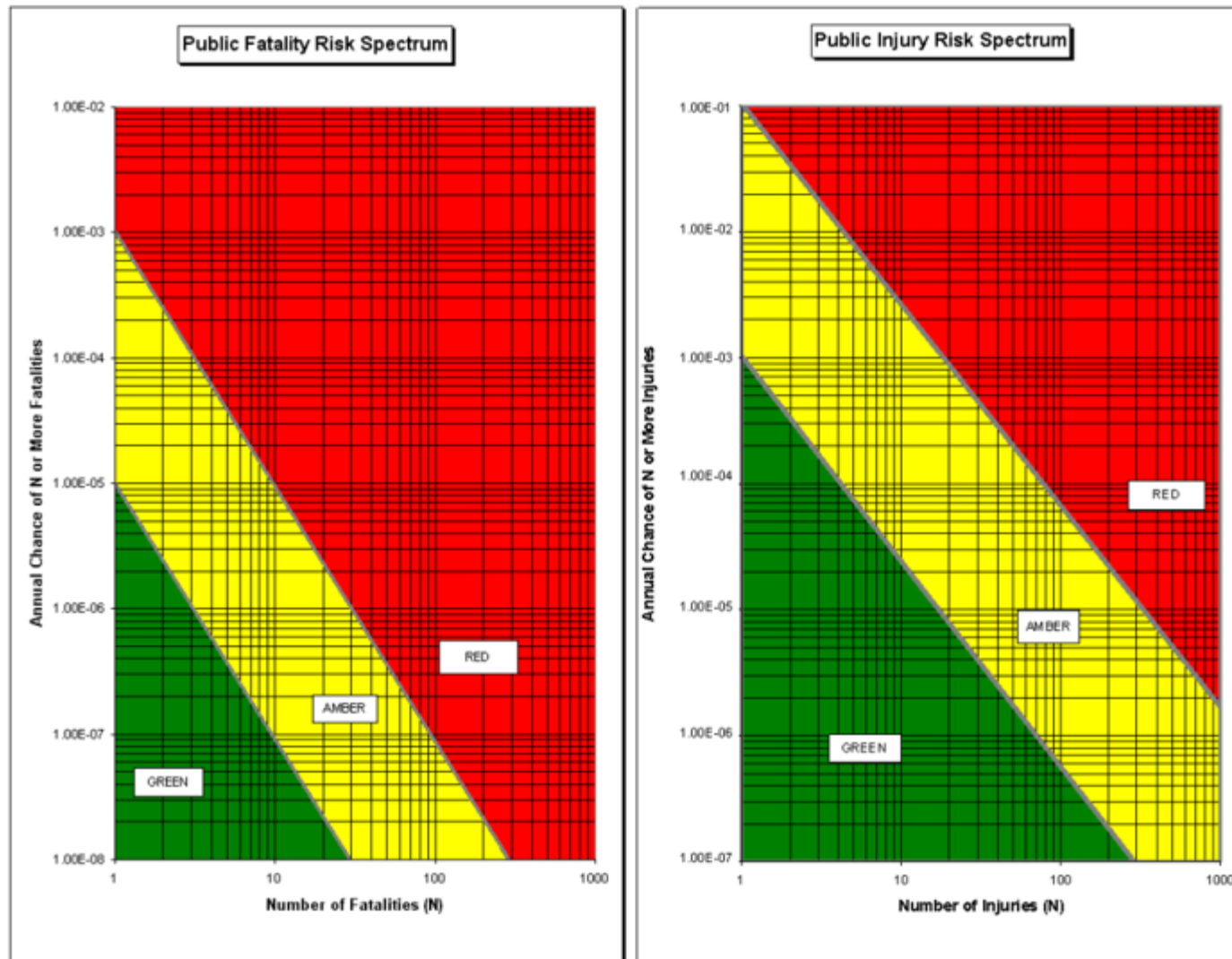
**7. Handling, storage, and transport of anhydrous ammonia in containers with a capacity of one ton or more, or an equivalent amount of anhydrous ammonia in bottles or cylinders connected through a common header.**

The project would involve the transport, use, and storage of anhydrous ammonia exceeding one ton (category 7 above) and therefore may result in a potentially significant risk to public safety due to exposure to hazardous materials. For projects that fall into one or more of the categories listed above, the County requires an analysis of risks to the public to identify the significance of project impacts to public safety from the storage or transport of hazardous materials. The County determines if a quantitative analysis of societal risk should be performed by applying the following four-step screening methodology:

1. Certain facilities, such as major produced gas pipelines and gas processing facilities that support offshore oil and gas facilities, will automatically be subject to quantitative risk analysis and the risk thresholds;
2. For facilities not included in Step 1, County staff first determines the hazard zone based on the threshold levels of concentration for the particular hazardous materials involved and reasonably worst-case accidents. Levels of concentration for most chemicals are identified by the State. The hazard zones for materials commonly used in the County will be determined. Any hazard zone that encompasses other potentially inhabitable land uses triggers Step 3, inclusive of non-hazardous development (other than a single-family residence) proposed within the hazard zone of an existing hazardous facility. Otherwise, the project is not considered to have a significant impact due to acute exposure to hazardous materials;
3. If the hazard zone encompasses off-site receptors, County staff then calculates the Individual Risk for the hazardous material(s) involved, based on the probability of an accident occurring, and proceeds to Step 4. Calculations may be pre-determined based on existing information or will be accomplished by a qualified risk analyst; and
4. County staff adjusts the Individual Risk to reflect conditional probabilities, called the Individual Specific Risk. Such probabilities address factors such as number of hours in the day in which someone is present in the hazard zone. A measurement of one in a million ( $1 \times 10^{-6}$ ) on an annual basis indicates sufficient evidence to trigger the risk thresholds and a comprehensive risk analysis.

To ensure compliance with applicable County requirements, the *Refrigeration Hazard Assessment Report for Permit Purposes* was prepared for the project, which includes screening data for quantifying societal risk from accidental release of hazardous materials (anhydrous ammonia) during project operation. The quantitative risk data report, which includes atmospheric dispersion modelling, produces the injury and fatality risk of a project. The injury and fatality risk for the project is then compared to County thresholds for the risks of serious injury (physical harm to a person that requires significant medical intervention) and risk of fatality. The County thresholds for societal risk are depicted as F/N (Frequency/Number) curves which include green, amber, and red zones. The County's significance descriptions are described in Table 4.9-2 and depicted graphically in Figure 4.9-1.

Figure 4.9-1 Santa Barbara County Fatality and Injury Risk Thresholds



Source: Santa Barbara Environmental Thresholds and Guidelines Manual, Revised 2020

**Table 4.9-2 County of Santa Barbara Significance Descriptions for Risk**

<b>Impact Classification</b>	<b>Description</b>
Significant and Unavoidable Impact	The County considers a societal risk spectrum that falls in the red or amber zones after application of all feasible mitigation to be an unavoidable, significant impact on public safety. Significant and unavoidable impacts to public safety may constitute an unreasonable risk, considering how far the risk spectrum penetrates into the red zone, the feasibility of alternative locations with lesser risk, other qualitative factors, and applicable law and guidelines. Unreasonable risk shall be determined for each project individually, based on policies provided in the Safety Element and other relevant policies and codes. Lacking any such determination, project approval requires a statement of overriding considerations by the applicable land-use authority, showing that the benefits of the proposed development exceed its adverse impacts to public safety.
Significant but Mitigable Impact	The County considers a societal risk spectrum that falls in either the red or amber zones to be a significant impact to public safety. Such risk shall be considered a significant but mitigable impact for purposes of compliance with CEQA if application of feasible mitigation is sufficient to lower the risk spectrum so that it falls fully within the green zone.
Insignificant Impact	The County considers a societal risk spectrum that falls completely in the green zone to be an insignificant impact to public safety and no mitigation (or additional mitigation) is required for purposes of compliance with CEQA.
Beneficial Impact	Impacts beneficial to the environment.

Source: Santa Barbara Environmental Thresholds and Guidelines Manual, Revised 2020

**b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Threshold 2:** Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

**Impact HAZ-1 CONSTRUCTION AND OPERATION WOULD INVOLVE TRANSPORT, USE, AND DISPOSAL OF HAZARDOUS MATERIALS WHICH COULD POSE A POTENTIAL HAZARD THROUGH UPSET OR ACCIDENT. HOWEVER, ALL HAZARDOUS MATERIALS WOULD BE TRANSPORTED, HANDLED, AND DISPOSED OF IN COMPLIANCE WITH EXISTING REGULATIONS AND ENVIRONMENTAL HEALTH SERVICES REQUIREMENTS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

**Construction Effects**

Construction of the proposed project would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and the construction activities would be required to comply with applicable State and federal regulations established by the U.S. EPA, the State of California, and the County of Santa Barbara for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of accidental spills. In addition, compliance with the Construction General Permit (refer to Section 4.10, Hydrology and Water Quality, of this EIR) requires implementation of Good Housekeeping Best Management Practices (BMPs) to avoid potential impacts to water quality due to spills or runoff from hazardous

materials used during construction. With compliance with existing regulations governing transport, use, and disposal of hazardous materials, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during construction would be less than significant.

## **Operational and Maintenance Effects**

Operation and maintenance of the project would involve transport, use, and disposal of hazardous materials or wastes associated with routine maintenance and cleaning of the processor and freezer facility. Propane forklifts, diesel fire pumps, and natural gas boilers would be utilized during project operation. In addition, the industrial refrigeration system would utilize anhydrous ammonia as the working fluid for cooling in a closed-loop system. Anhydrous ammonia is a colorless gas or liquid with a very strong, intensely irritating odor. Operation of the processor and freezer facility would require the use and storage of 50,000 pounds (25 tons) of anhydrous ammonia, which exceeds the one ton threshold as defined in the Santa Barbara County Environmental Thresholds and Guidelines Manual. Toxic vapors from accidental release of anhydrous ammonia can pose a significant hazard to public safety and the environment.

Anhydrous ammonia would be transported to the project site prior to project operation when the processor and freezer system is initially filled and periodically (likely annually) during operation when the system needs to be topped off. The transport and filling would be provided by companies specializing in ammonia transport. Ammonia transport is regulated by the California Department of Transportation. Ammonia transport would comply with the existing regulations aimed at reducing risk of accidental spills.

A quantitative analysis of public risks of injury and fatality was conducted for the project (Appendix G). The quantitative analysis was prepared in accordance with the requirements of the Santa Barbara County Planning and Development Department which specify thresholds for significant impacts to public safety (refer to Table 4.9-2 and Project Impacts Figure 4.9-1). These thresholds focus on risks (a combination of annual likelihood and human health consequence) associated with project operations involving significant quantities of hazardous materials (in this case, anhydrous ammonia).

The quantitative risk analysis screening reviewed the proposed project operations to identify potential hazards to the public of flammable and/or toxic releases. Ammonia is classified as a toxic substance and is not considered flammable. Although ammonia is not highly flammable, pressurized containers of ammonia may explode when exposed to high heat. Release could occur from incidents such as transfer hoses due to splits or sudden hose uncoupling; process piping from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds; process vessels or pumps due to cracks, seal failure, or drain, bleed, or plug failure; vessel overfilling and spill, or over pressurization and venting through relief valves or rupture disks; and shipping container mishandling and breakage or puncturing leading to a spill.

The quantitative risk analysis screening considered the following accidental release scenarios:

- **Worst-Case Scenario.** The worst-case scenario assumes the maximum amount of ammonia (7,500 pounds) that could be stored in the largest vessel (the high-pressure receiver) is released over a ten-minute period. The worst-case scenario is considered unlikely to occur because this scenario does not consider any design or operational safety features and does not account for the reduction in release rate that would occur over time. Additionally, based on research conducted with the International Institute of Ammonia Refrigeration and other refrigeration experts in the United States, no cases of catastrophic vessel failure within the last 40 years were found.

**Arctic Cold Agricultural Processor and Freezer Project**

- **First Alternate-Case Scenario.** An oil draining accident occurs while draining oil from a spring-return valve. The scenario assumes that a foreign object becomes lodged within the spring-return valve, preventing it from being closed completely. This scenario assumes it takes approximately 5 minutes to close an upstream isolation valve to stop the leak and 2,987 pounds of ammonia are released. Based on an abstract paper presented at the 2020 International Institute of Ammonia Refrigeration National Conference, oil draining accounted for 33 percent of the reported releases; therefore, this scenario was selected as a likely scenario (i.e., a scenario requiring analysis to identify the potential area affected).
- **Second Alternate-Case Scenario.** A liquid feed solenoid valve, which has four screws at the top, and feeds the evaporators is leaking from the bonnet due to the gaskets/seals failing and is dripping liquid ammonia on the roof. This scenario assumes it takes a few minutes for an employee to detect a slight ammonia smell and alert facility personnel. This scenario also assumes that facility personnel call a refrigeration contractor to assist in the valve isolation. Assuming the contractor is not near the facility, the valve could take two hours to isolate and stop the leak and 746 pounds of ammonia are released. Based on an abstract paper presented at the 2020 International Institute of Ammonia Refrigeration National Conference, releases from solenoid valves accounted for 24 percent of the reported releases; therefore, this scenario was selected as a likely scenario.
- **Third Alternate-Case Scenario.** A direct release of ammonia liquid occurs from an irregular ¼" diameter hole in a pumped liquid line due to a failed weld or valve seal. The release was assumed to occur for five minutes, at which point the facility personnel institute an emergency shutdown to stop the release. The scenario assumes that 466 pounds of ammonia are released over a period of 50 minutes. This scenario was selected from the suggested scenarios listed in the California Accidental Release Prevention (CalARP) Program. There have been 75 releases of this nature at 56 facilities in California between 1996 to 2011.

The worst-case scenario would potentially affect a 1.2 mile radius (Figure 4.9-2). The area potentially affected considering average wind speed (3.4 miles per hour in a southeastern direction) is depicted on Figure 4.9-3. The worst-case scenario would potentially affect an off-site population of fewer than 193 people at the 200 ppm endpoint (toxic endpoint) and fewer than 12 people at the 1,100 ppm endpoint (rare possibility of fatalities) depending on the wind direction. The area affected encompasses residential uses, high school, commercial and retail establishments, and industrial areas. Off-site affected individuals would be exposed to ammonia levels that would produce minor irritation and lead to watery eyes, runny nose, and cough. The levels would be below CalOSHA exposure guideline, which are based on concentration and duration of exposure, and would be categorized as a non-serious injury. No serious injuries or fatalities would be anticipated to occur under this scenario. The area potentially affected for all scenarios are depicted in the *Refrigeration Hazard Assessment Report for Permit Purposes* in Appendix G.

Because the worst-case scenario is unlikely to occur, alternate-case scenarios are also analyzed to identify the potential area affected based on hypothetical release scenarios that are based on more realistic circumstances. None of the alternate-case scenarios would potentially affect off-site populations. The area affected by the alternative-case scenarios encompasses industrial areas.

Figure 4.9-2 Area Potentially Affected for the Worst-Case Release Scenario

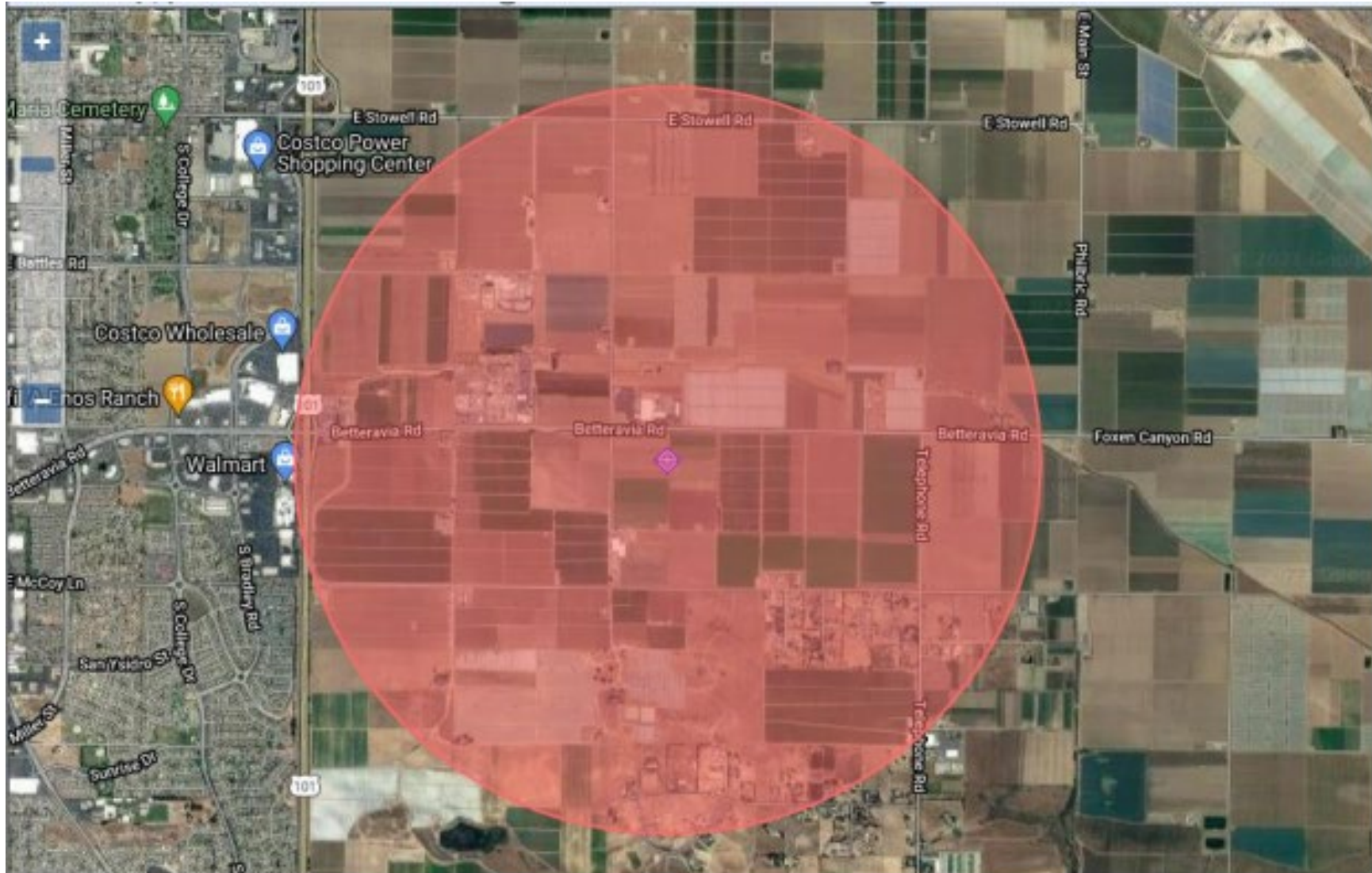
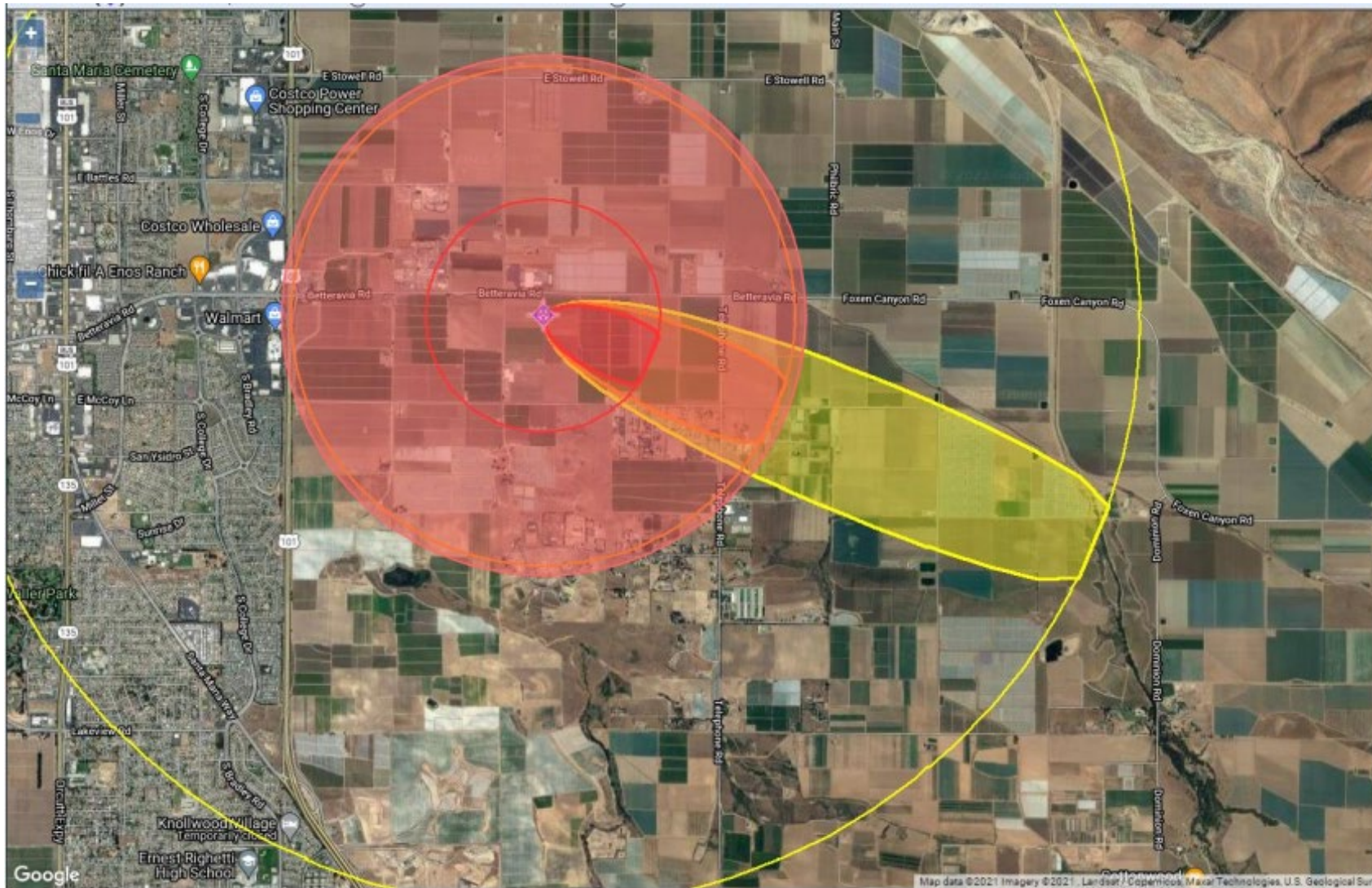


Figure 4.9-3 Area Potentially Affected for the Worst-Case Release Scenario Considering Wind Direction



- Note:
1. Wind speed was assumed to be 3.4 miles per hour in a southeastern direction
  2. The orange section depicts the area with an ammonia concentration of 200 ppm (toxic endpoint)

The injury and fatality risk of the worst-case scenario was compared to the County thresholds for societal risk using the F/N curves (Figure 4.9-4 through Figure 4.9-6). Figure 4.9-4 shows the risk of injury from an accidental release for the worst-case scenario. Based on a review of the area affected that could sustain non-fatal injuries (southeastern portion of Figure 4.9-3), 31 residences with an estimated population of 124 are located in the affected area. However, two of the residences (estimated population of eight) reside within the 1,100 ppm endpoint (rare possibility of fatality occurring) and were considered in the fatality graph (Figure 4.9-5); therefore, the estimated population with possible injuries was estimated at 116 people.

Figure 4.9-5 shows the risk of fatality from an accidental release for the worst-case scenario. The area where potential fatalities could occur (i.e. the 1,100 ppm endpoint) encompasses three residences with an estimated population of 12. However, the area with the highest potential to be affected based on the wind direction would occur southeast of the project site (Figure 4.9-3) which encompasses two residences (estimated population of eight). Based on a review of wind data, wind in a direction that would affect the population to the northeast of the project site occurs approximately 5 percent of the time.

Figure 4.9-6 shows the risk of injury considering historical data from accidents recorded in California for more than 685 facilities over a 15 year period between 1996 and 2011. Based on the historical data, the probability of an incident per facility per year is  $7.29 \times 10^{-3}$  and the number of off-site injuries per incident per facility per year is  $1.18 \times 10^{-4}$ . The probability of accidental release based on the historical data is similar to that of the alternative-case scenarios analyzed for the proposed project.

Based on the estimated probability of an accidental release and the potential injuries and fatalities, the project falls within the green zone of the societal risk spectrum as demonstrated on Figure 4.9-4 through Figure 4.9-6. As such, public risk from accidental release would be less than significant.

In addition to off-site population, an accidental release would have the potential to affect on-site employees. The proposed agricultural processing and freezer facility would include engineering controls/design features specifically geared for employee safety. The safety systems would include remote access, facility and engine room cameras, liquid king valve (to stop ammonia from exiting the system), engine room exhaust control and emergency exhaust fan, engine room ammonia sensors and detectors, ammonia monitors at the engine room entrance, and fire alarm and suppression systems. Additionally, the average individual can detect ammonia at very low concentrations (less than 5 ppm), such that employees would be able to vacate the area, institute an evacuation, and notify the applicable response staff and authorities in the event of an accidental release. Nevertheless, the potential hazard to employees associated with accidental release is potentially significant, requiring mitigation.



Figure 4.9-4 Public Injury Risk for the Worst-Case Release Scenario

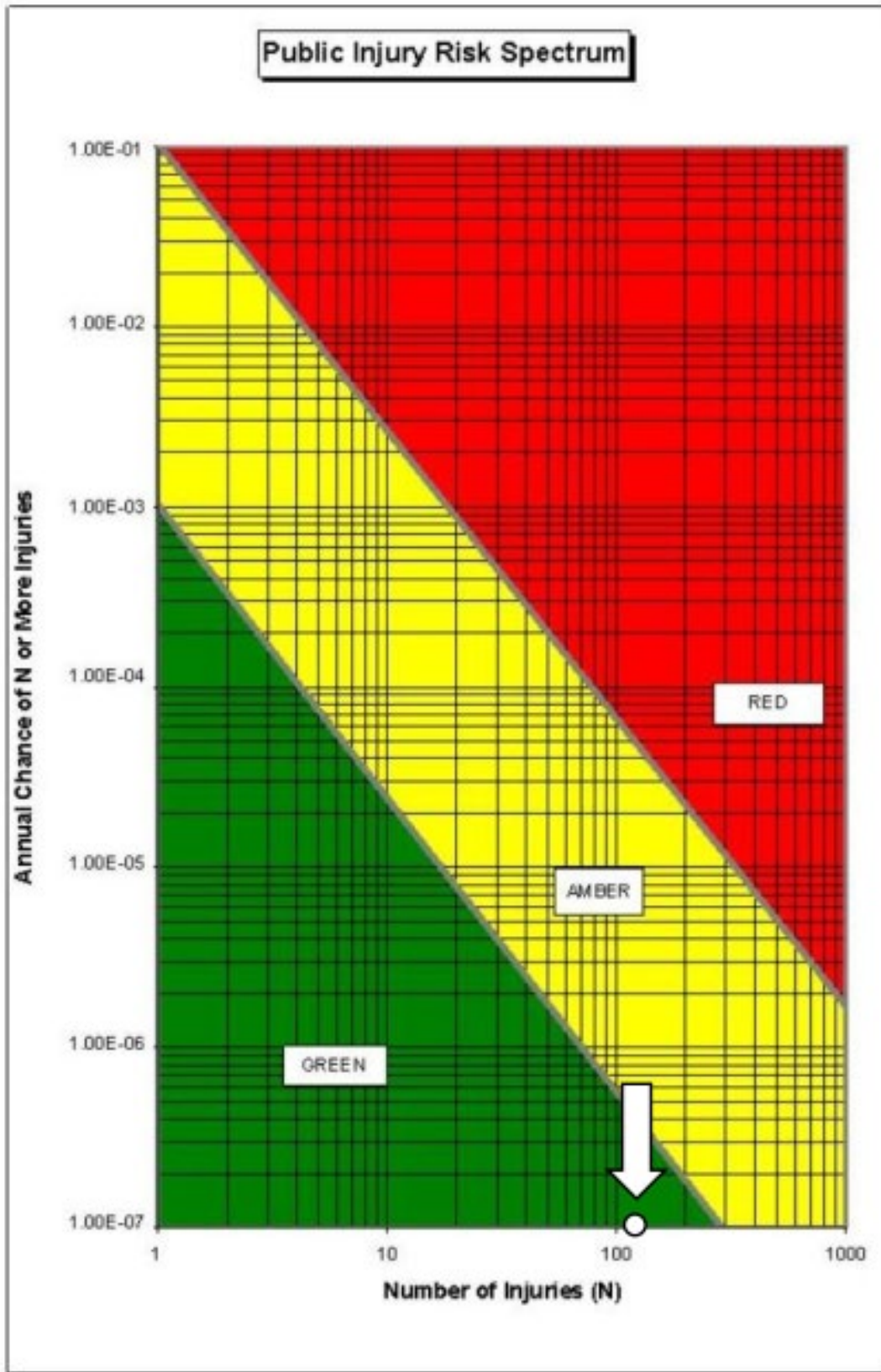


Figure 4.9-5 Public Fatality Risk for the Worst-Case Release Scenario

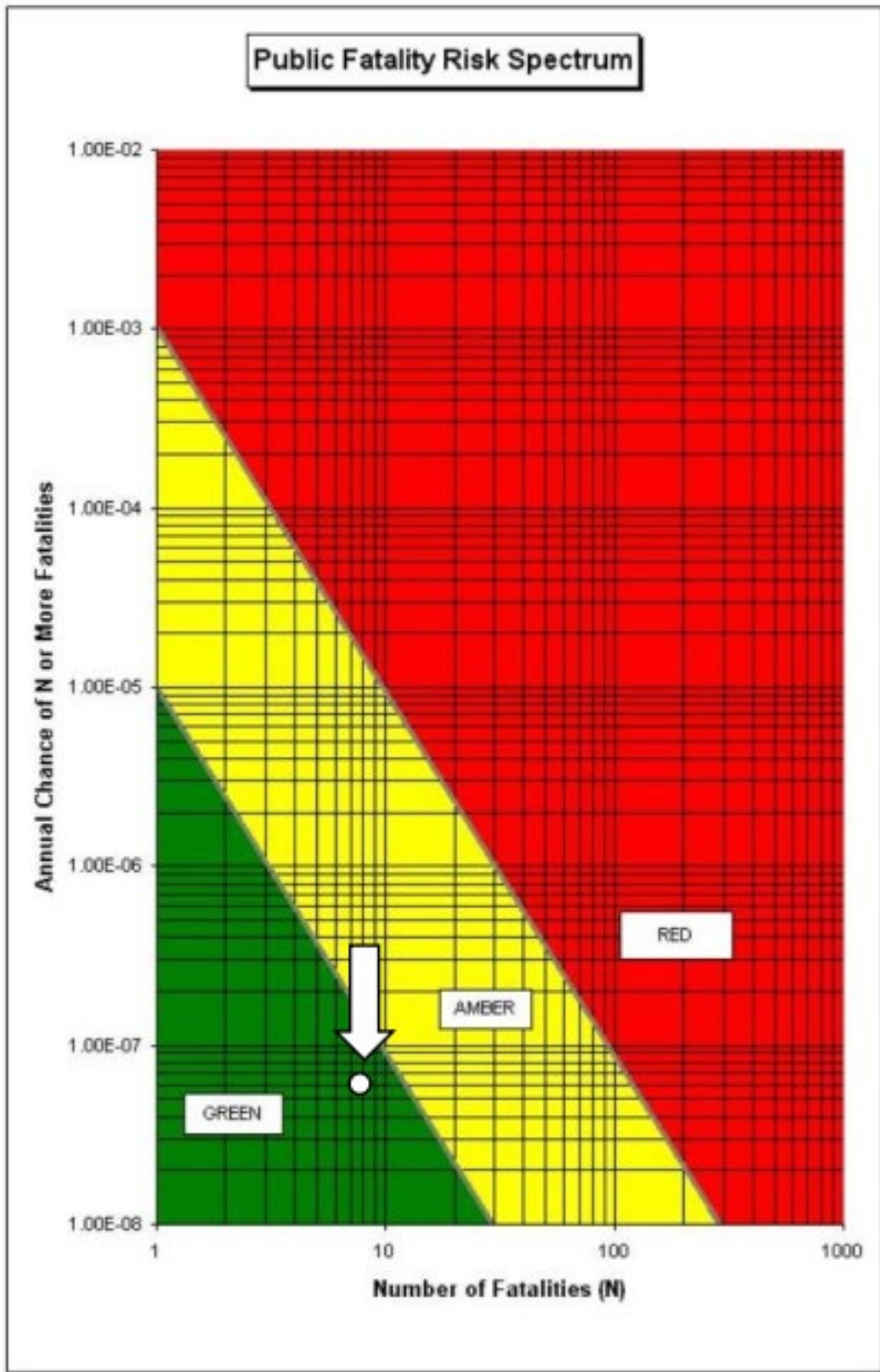
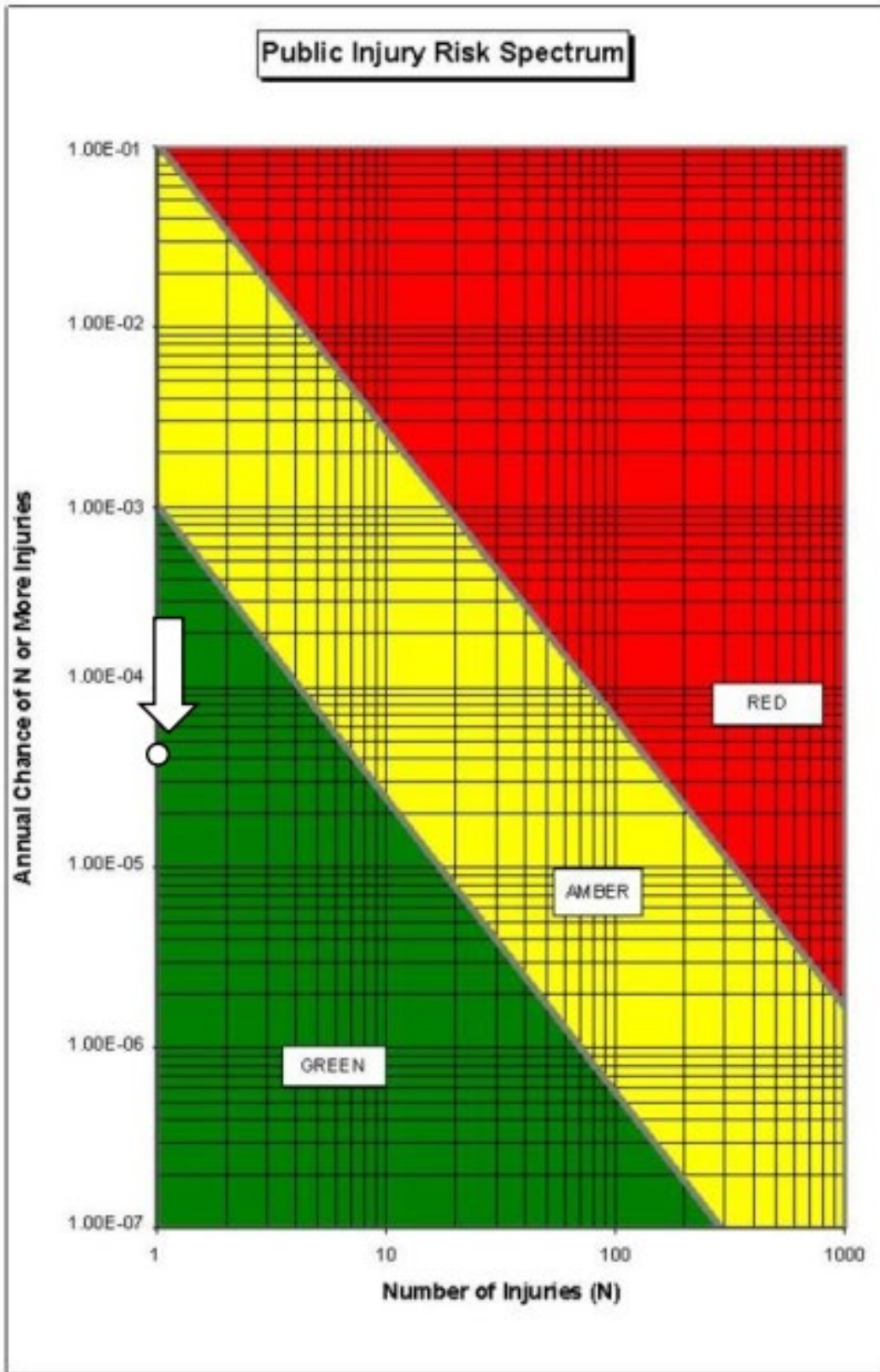


Figure 4.9-6 Public Injury Risk Spectrum Based on Historical Release Data



Hazardous materials, such as ammonia, would be disposed of at contracted solid waste disposal providers to ensure that hazardous materials are disposed of at appropriate facilities. All hazardous materials would be handled, stored, used, transported, and disposed of in compliance with existing hazardous materials regulations established by the U.S. EPA, the State of California, and the County of Santa Barbara. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of accidental spills. With compliance with existing regulations governing transport, use, disposal of hazardous materials and implementation of Mitigation Measure HAZ-1, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during operation would be reduced to a less than significant level.

## **Mitigation Measures**

### *HAZ-1 Risk Management Plan and Hazardous Materials Inventory*

Prior to issuance of the certificate of occupancy, the Applicant shall coordinate with the County of Santa Barbara Environmental Health Services, the Certified Unified Program Agency (CUPA) for the project, to verify that the proposed facility is in compliance with California Health and Safety Code, Chapter 6.95, and Title 19 CCR, Division 2, Chapter 4. If required by Environmental Health Services, a Release Response Plan and/or Hazardous Materials Inventory shall be submitted to Environmental Health Services for review and approval at least 30-days prior to bringing ammonia or other hazardous materials on-site if more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials would be used on the project site. The Risk Management Plan shall include a prevention and emergency response plan and shall incorporate the safety features specified in the *Refrigeration Hazard Assessment Report for Permit Purposes* prepared for the project.

**Plan Requirements and Timing.** This measure shall be implemented prior to issuance of building permits and shall be included on all land use and building plans.

**Monitoring.** Planning & Development compliance monitoring staff shall confirm completion of coordination with the County of Santa Barbara Environmental Health Services and, if applicable, shall confirm a Risk Management Plan and/or Hazardous Materials Inventory has been approved by Environmental Health Services.

## **Significance After Mitigation**

Mitigation Measure HAZ-1 would minimize risk of accidental release and ensure that safety features assumed in the quantitative risk analysis are included in the required Risk Management Plan and Hazardous Materials Inventory. Implementation of this required mitigation would reduce impacts related to hazardous materials during operation to a less-than-significant level.

**Threshold 4:** Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Impact HAZ-2 HAZARDOUS MATERIALS WERE HISTORICALLY USED AT THE PROJECT SITE, INCLUDING THREE ABANDONED OIL AND GAS WELLS AND A PETROLEUM WELL TRANSMISSION LINE. HOWEVER, ALL THREE WELLS WOULD BE REQUIRED TO BE ABANDONED IN COMPLIANCE WITH CURRENT CALGEM STANDARDS. NO SIGNIFICANT HAZARDS OR HAZARDOUS MATERIALS THAT EXCEED HEALTH STANDARDS WERE IDENTIFIED ON THE PROJECT SITE DURING THE SITE RECONNAISSANCE OR SOIL SAMPLING. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.**

The project site is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant. Because of the past agricultural uses on the property, there is a potential for pesticides and arsenic to be present in on-site soils.

As discussed in Section 4.9.1, there are 10 existing petroleum wells on the subject property: eight were plugged and abandoned and two are classified as idle. Three of the abandoned wells are located on the 40-acre project site, at the northeast portion of the subject property. An abandoned petroleum well transmission line also runs through the subject property from the northwest corner to the southwest corner, crossing the southwestern portion of the project site. The project site is included on lists of hazardous material sites compiled pursuant to Government Code Section 65962.5 for a prior unauthorized release from the petroleum wells, sumps, pipelines and other facilities associated with the Unocal Vincent B Lease oil field located on the subject property. There have been past clean-up activities on the site; however, the case is not closed.

Because of the past use on the project site for oil drilling and agriculture, on-site soils were tested for VOCs, methane, organic chlorinated pesticides, and arsenic. Concentrations of VOCs, methane, organic chlorinated pesticides, and arsenic did not exceed applicable CHHSLs or action levels; therefore, it is not anticipated that excavated soils would disturb hazardous materials in on-site soils or require special handling or disposal. Therefore, construction workers would not be exposed to known hazardous materials as a result of disturbance of on-site soils. However, unknown hazardous waste or materials could be encountered during excavation. As required by Mitigation Measure HAZ-2, any suspect potentially hazardous materials unearthed during construction would require work be stopped and the County of Santa Barbara Environmental Health Services, Site Mitigation Unit, contacted for evaluation, which could require testing, removal, and disposal at appropriate facilities in accordance with State and federal regulations. Hazardous materials would be required to be removed and disposed of in compliance with existing hazardous materials regulations established by the U.S. EPA, the State of California, and the County of Santa Barbara. These regulations prescribe measures for the safe handling and disposal of hazardous materials to reduce risk of accidental spills. With compliance with existing regulations governing transport, use, and disposal of hazardous materials and implementation of Mitigation Measure HAZ-2, impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during construction would be reduced to less than significant.

In their Notice of Preparation (NOP) response letter dated December 20, 2019, DOGGR (now known as CalGEM) recommended that the three petroleum wells within the project site be re-abandoned to current standards. DOGGR also advised that the petroleum wells not be built over or their access impeded. Per this requirement, the three oil wells would be re-abandoned in compliance with current CalGEM standards. Additionally, the proposed buildings would not be constructed over the petroleum wells. As required by Mitigation Measure HAZ-3, a No Further Action determination would be

required to be obtained from the Environmental Health Services, Site Mitigation Unit (the current oversight agency for clean-up activities on the project site related to the Unocal Vincent B Lease case) for the petroleum wells on the project site prior to issuance of grading permits. The No Further Action letter would verify that the project site has been remediated to current regulatory standards and does not represent a threat to public health or the environment. Re-abandonment of the on-site wells to current regulatory standards and issuance of a No Further Action determination, as required by Mitigation Measure HAZ-3, would ensure that impacts associated with on-site petroleum wells would be reduced to a less than significant level.

## **Mitigation Measures**

### *HAZ-2 Hazardous Substance Control and Emergency Response Plan and Environmental Training Program*

A Hazardous Substance Control and Emergency Response Plan and Environmental Training Program shall be prepared by the construction contractor and approved by the County of Santa Barbara prior to construction. The Hazardous Substance Control and Emergency Response Plan shall include measures for safe cleanup of hazardous materials. The Environmental Training Program shall include training on identification of potentially hazardous substances. If any potentially hazardous waste or other hazardous materials are unearthed during construction, the construction contractor shall immediately stop work in the vicinity of the suspect material and contact the County of Santa Barbara Environmental Health Services, Site Mitigation Unit. Environmental Health Services shall evaluate the material and recommend the appropriate testing, removal, and disposal methods. The construction contractor shall ensure that any hazardous materials are removed or remediated in accordance with the requirements of Environmental Health Services and the Hazardous Substance Control and Emergency Response Plan. The construction contractor shall not resume work in the vicinity of the suspect hazardous material until approved by Environmental Health Services.

**Plan Requirements and Timing.** This measure shall be implemented during construction and shall be included on all grading and building plans.

**Monitoring.** Planning & Development compliance monitoring staff shall confirm monitoring by the construction contractor and grading inspectors shall spot check field work.

### *HAZ-3 No Further Action Determination*

Prior to issuance of grading permits unrelated to re-abandonment or remedial activities, the Applicant shall obtain a No Further Action determination from the County of Santa Barbara Environmental Health Services, Site Mitigation Unit. To obtain the determination, the Applicant shall ensure that the petroleum wells on the project site are re-abandoned in compliance with current CalGEM standards pursuant to California Code of Regulations (CCR) Sections 1723.1 through 1723.5. Prior to initiation of re-abandonment activities, the Applicant shall obtain written approval from CalGEM to proceed with re-abandonment.

**Plan Requirements and Timing.** This measure shall be implemented prior to issuance of grading permits and shall be included on all land use, grading, and building plans.

**Monitoring.** Planning & Development compliance monitoring staff shall confirm a No Further Action Determination has been obtained from the County of Santa Barbara Environmental Health Services.

## **Significance After Mitigation**

Mitigation Measure HAZ-2 requires that Environmental Health Services be contacted if unknown hazardous materials are discovered during construction. If determined to be hazardous, the material would be required to be removed or remediated before construction activities are resumed. Mitigation Measure HAZ-3 would require re-abandonment of the on-site petroleum wells to current regulatory standards and issuance of a No Further Action determination. With implementation of Mitigation Measure HAZ-2 and HAZ-3, impacts related to hazardous materials during construction and operation would be reduced to a less-than-significant level.

### **c. Cumulative Impacts**

As detailed in Chapter 3, Environmental Setting, cumulative development in the northern portion of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed (in process), approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project.

Continued urban development in northern Santa Barbara County and the City of Santa Maria will cumulatively increase the potential for exposure to existing soil contamination, including organic chlorinated pesticides and other agricultural chemicals. In addition, cumulative development in the region will increase the interface among agricultural, residential, and industrial uses. Cumulative impacts associated with hazards and hazardous materials are typically site-specific. However, an overall increase in the potential for human health hazards will occur as urbanization occurs. The project and other cumulative projects would be required to comply with existing regulations governing transport, use, and disposal of hazardous materials. Compliance with existing regulations would ensure cumulative impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during construction would be less than significant.

In addition, all new development in Santa Barbara County is subject to review and oversight by the relevant resource agencies and as well as subject to applicable laws and regulations in place to minimize such potential hazards, to the extent feasible, which would help reduce significant impacts that might otherwise occur. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis and appropriate mitigation would be designed to mitigate impacts resulting from individual projects, depending upon the type and severity of hazards present. Assuming that all hazards are adequately addressed for individual development proposals, no significant cumulative human health impacts are anticipated, and cumulative impacts related to hazards and hazardous materials would be less than significant. As discussed above, the project also would have less than significant project-specific operational impacts related to hazards after implementation of mitigation. Therefore, the proposed project would not make a cumulatively considerable contribution to cumulative impacts.

## 4.10 Hydrology and Water Quality

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The background information and analysis in this section is based partially on the *Flood Control: Drainage Study* prepared for the project by Bethel Engineering in April 2020 (Appendix H), the *Ground Water Analysis* and addenda prepared for the project by Katherman Exploration CO, LLC in March and October 2020 (Appendix I), the *Geotechnical Investigation* prepared for the project by Pacific Coast Testing in April 2020 (Appendix F), and the *Stormwater Control Plan* prepared for the project by Fisher Construction Group in September 2020 (Appendix H).

### 4.10.1 Environmental Setting

#### a. Project Site Setting

##### **Watersheds and Surface Waters**

The project area is located within the Santa Maria Watershed, which covers approximately 1,880 square miles (1.2 million acres) in northern Santa Barbara County and southern San Luis Obispo County. The Santa Maria Watershed includes all tributaries to the Cuyama River, Sisquoc River, and Santa Maria River.

For regulatory purposes, the Central Coast Regional Water Quality Control Board (RWQCB) uses the watershed classification system developed by the Department of Water Resources (DWR), which divides watersheds into Hydrologic Units (HUs) that are divided into Hydrological Areas (HA). As designated by the Central Coast RWQCB, the project area is located within Santa Maria HU and the Guadalupe HA (RWQCB 2019).

The Santa Maria River is located 2.3 miles east of the project site. The Santa Maria River is formed at the confluence of the Sisquoc River and Cuyama River, just east of the city of Santa Maria. From the confluence, the Santa Maria River flows 24.4 miles to its delta at the Pacific Ocean (RWQCB 2002). The State Water Resources Control Board (SWRCB) has listed the Santa Maria River as impaired by a variety of pollutants, including sediment, pathogens, pesticides, excessive salinity, and toxicity (SWRCB 2017).

##### **Hydrology and Drainage**

As discussed in Section 4.4, Biological Resources, no aquatic features within the project site are depicted on the *National Wetlands Inventory* (NWI; U.S. Fish and Wildlife Service [USFWS] 2020a) or *National Hydrography Dataset* (NHD; U.S. Geological Survey [USGS] 2020). Note that the mapping presented in the NWI and NHD provide useful context but are not a completely accurate depiction of current conditions on the project site, particularly regarding alignment of drainages and the flow regime. A maintained irrigation ditch located along the northern and eastern boundary of the project site. Irrigation ditches are located throughout the region to supply irrigation water to agriculture crops.

According to the *Flood Control: Drainage Study* prepared for the project (Appendix H), the project site gently slopes to the northwest and discharges storm water runoff to the existing drainage ditch along the south edge of Betteravia Road. As discussed in Section 4.4, Biological Resources, the on-site irrigation ditch appears to have no direct connection to the Santa Maria River based on aerial imagery investigations (Google Earth 2020).



## **Groundwater**

The project site overlies the Santa Maria Groundwater Basin, a 170 to 175 square mile alluvial basin that underlies the Santa Maria Valley, Nipomo Mesa, Tri-Cities Mesas, Arroyo Grande Plain, Nipomo Valley, Arroyo Grande Valley, and Pismo Creek Valley. The Santa Maria Groundwater Basin is bounded on the north by the San Luis and Santa Lucia Ranges, on the east by the San Rafael Mountains, on the south by the Solomon Hills and the San Antonio Creek Valley Groundwater Basin, on the southwest by the Casmalia Hills, and on the west by the Pacific Ocean. The total storage capacity of the Santa Maria Groundwater Basin is greater than 14.9 million acre-feet. Natural recharge to the Santa Maria Groundwater Basin is primarily from percolation of flow from the major streams, percolation of rainfall, and subsurface flow. Recharge in the Santa Maria Valley is provided by percolation of flow from the Santa Maria River, which is controlled by releases from Twitchell Dam (DWR 2004).

Due to legal disputes regarding the status of the Santa Maria Groundwater Basin and water demands, the majority of the Santa Maria Groundwater Basin was adjudicated in 2008. Its management is dictated by the courts and requires annual reporting. The court judgement divided the overall Santa Maria Groundwater Basin into three management areas, the largest of which overlies the main Santa Maria Valley (the Santa Maria Valley Management Area [SMVMA]). The SMVMA includes approximately 175 miles of the Santa Maria Groundwater Basin in northern Santa Barbara and southern San Luis Obispo Counties. The SMVMA encompasses the contiguous area of the Santa Maria Valley, Sisquoc Plain, and Orcutt upland, and is primarily comprised of agricultural land and areas of native vegetation, as well as the urban areas of Santa Maria, Guadalupe, Orcutt, Sisquoc, and several small developments. The Twitchell Management Agency manages the SMVMA as directed by the court (Luhdorff and Scalmanini Consulting Engineers [LSCE] 2020).

Water levels in the Santa Maria Groundwater Basin began to noticeably decline in about 1945, coinciding with an increase in agricultural acreage and urban population. Levels have greatly fluctuated throughout the basin in recent decades as a result of fluctuations in rainfall amounts, land use changes, and Twitchell Reservoir recharge availability. Water levels throughout the basin have declined since the beginning of the most recent drought in 2012 (County of Santa Barbara 2020). As also noted in the 2019 annual report for the SMVMA, the shallow and deep groundwater levels across the majority of the SMVMA remain slightly above historical low levels and do not meet the definition of a condition of severe water shortage.

Total dissolved solids (TDS) levels in the SMVMA have generally remained stable at or below the California Department of Public Health's secondary drinking water standard (e.g., for taste and odor) of 1,000 mg/L. Nitrates remain elevated above the primary drinking water standard of 45 mg/L nitrate-NO<sub>3</sub> (LSCE 2020).

According to the *Ground Water Analysis* prepared for the project (Appendix I), there are two existing groundwater supply wells located on the project site. According to the *Geotechnical Investigation* prepared for the project (Appendix F), groundwater beneath the project site is located greater than 70 feet below the existing grade.

## **Flooding**

The project site is not subject to flooding. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06083C0195F (FEMA 2005), the project site is not located within a special flood hazard area. The site is located in Zone X, which comprises areas with minimal flood hazard that have been determined to be outside of the 0.2 percent annual chance flood (500-year flood).

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves and seiches are standing waves within confined bodies of water, typically reservoirs. As the property is located approximately 14 miles from the Pacific Ocean, the project site is not subject to inundation from tsunami. Due to the absence of a large body of water upslope of the property, the project site is not subject to inundation from seiche.

Twitchell Reservoir is located approximately 5.75 mi northeast of the project site. Twitchell Reservoir is formed by Twitchell Dam on the Cuyama River, approximately 6 miles upstream of the confluence with the Sisquoc River where the two rivers meet to form the Santa Maria River. According to the Dam and Levee Failure Evacuation Plan (San Luis Obispo Office of Emergency Safety, 2016), the project site is not located within the inundation zone of Twitchell Dam.

## **b. Water Quality Background**

The following is a summary of information from the Santa Barbara County Public Works Water Resources Division and is intended to provide sufficient background material to allow consideration of the potential hydrology and water quality impacts of the project.

### **Storm Water Runoff**

Storm water runoff from lands modified by human activities can harm surface water resources and, in turn, cause or contribute to an exceedance of water quality standards by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables. After a storm event, water runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, wetlands, and oceans. The highest concentrations of these contaminants often are contained in “first flush” discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction.

Urbanization alters the natural infiltration capability of the land and generates a host of pollutants that are associated with the activities of dense populations, thus causing an increase in storm water runoff volumes and pollutant loading in storm water that is discharged to receiving water bodies. Urban development increases the amount of impervious surface in a watershed as farmland, forests, and other natural vegetation with natural infiltration characteristics are converted into buildings with rooftops, driveways, sidewalks, roads, and parking lots with virtually no ability to absorb storm water. Storm water runoff washes over these impervious areas, picking up pollutants along the way while gaining speed and volume because of their inability to disperse and filter into the ground. What results are storm water flows that are higher in volume, pollutants, and temperature than the flows from more pervious areas, which have more natural vegetation and soil to filter the runoff. Studies reveal that the level of imperviousness in an area strongly correlates with decreased quality of the nearby receiving waters.

### **Construction Site Runoff**

Polluted storm water runoff from construction sites often flows to storm drains and ultimately is discharged into local rivers and streams. Sediment is usually the main pollutant of concern. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural

lands, and 1,000 to 2,000 times greater than those of forest lands. Pollutants that are commonly discharged from construction sites include sediment, solid and sanitary wastes, nitrogen (fertilizer), phosphorus (fertilizer), pesticides, concrete truck wash out, construction chemicals, and construction debris.

### **Post Construction Runoff**

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

## 4.10.2 Regulatory Setting

### **a. Federal Regulations**

#### **Clean Water Act**

The Federal Water Pollution Prevention and Control Act was enacted in 1948 to ensure that discharges do not substantially degrade the physical, chemical, or biological integrity of the Nation's waters. In 1972, the Federal Water Pollution Control Act was amended (and at that time became known as the Clean Water Act [CWA]) to prohibit discharge of pollutants to waters of the United States from any point source unless it is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Specifically, Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) Regulations for stormwater and other pollutant discharges.

Congress amended the CWA in 1987 to require the implementation of a two-phased program to address storm water discharges. Phase I, promulgated by the U.S. Environmental Protection Agency (EPA) in November 1990, requires NPDES permits for storm water discharges from municipal separate storm sewer systems (MS4s)<sup>1</sup> serving populations of 100,000 or greater, construction sites disturbing greater than 5 acres of land, and ten categories of industrial activities.

The EPA recognized that smaller construction projects (disturbing less than 5 acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve storm water quality, the EPA promulgated the NPDES Phase II program (*Federal Register* Vol. 64, No. 235, December 8, 1999). The Phase II regulations became effective on February 7, 2000 and require NPDES permits for storm water discharges from regulated small MS4s and for construction sites disturbing between 1 and 5 acre of

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<sup>1</sup> An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are that owned by a state, city, town, or other public entity and discharge to waters of the United States.

land. The Phase II regulations published by the EPA designated the urbanized areas of Santa Barbara County as a regulated small MS4.

In addition, Sections 401 and 404 of the Clean Water Act establish regulations for the discharge of dredged or fill material into waters of the United States and water quality impacts associated with these discharges.

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a “factor of safety” included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body. There are approved TMDLs for fecal indicator bacteria, nutrients, and pesticides for the Santa Maria Watershed (RWQCB 2020).

## **National Flood Insurance Program**

Congress acted to reduce the costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues FIRMs of communities participating in the NFIP. These maps delineate flood hazard zones in the community. The Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD) manages local storm drain facilities and is responsible for regional flood control planning within the County.

### **b. State Regulations**

#### **Porter-Cologne Water Quality Control Act of 1970**

The federal CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. California’s primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) broad powers to protect water quality and is the primary vehicle for the implementation of California’s responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The County, including the project site, is within the jurisdictional boundaries of the Central Coast RWQCB (Region 3).

## **California Toxics Rule**

Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, EPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR). The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The CTR is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the CTR criteria do not apply directly to discharges of storm water runoff, they are utilized as benchmarks for toxics in urban runoff. The CTR is used as a benchmark to evaluate the potential ecological impacts of storm water runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without deleterious effects. Chronic criteria provide benchmarks for an extended period of time (i.e., 4 days or more) without deleterious effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for storm water flows.

CTR criteria apply to the receiving water body and are calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents (including copper, lead, and zinc) are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

## **Phase II Municipal Storm Water Permit**

The Municipal Storm Water Permitting Program regulates storm water discharges from MS4s. The NPDES MS4 permits in California are issued in two phases by the SWRCB and RWQCBs. Phase I MS4 permits are issued by the RWQCBs to medium (i.e., serving between 100,000 and 250,000 people) and large (i.e., serving more than 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permit is issued by the SWRCB and is applicable to smaller municipalities (i.e., populations of less than 100,000 people) and nontraditional small MS4s (e.g., military bases, public campuses, and prison and hospital complexes). The Phase II MS4 Permit (*Waste Discharge Requirements [WDRs] for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems [MS4s] General Permit*), Order No. 2013-0001-DWQ, NPDES No. CAS000004) became effective on July 1, 2013 and covers Phase II permittees statewide, including the County of Santa Barbara. The Phase I and Phase II MS4 Permits require the permittees to develop a storm water management program and individual dischargers to develop and implement Storm Water Quality Management Plans (SWMP).

## **Sustainable Groundwater Management Act**

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California state law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come. The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies (GSAs) that are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins.

DWR has designated the Santa Maria Groundwater Basin as a very-low priority basin (DWR 2020a). Adjudicated basins, such as the Santa Maria Groundwater Basin, are exempt from forming a groundwater sustainability agency and developing a groundwater sustainability plan. However, SGMA requires that watermasters or managers of adjudicated groundwater basins annually submit information to DWR on groundwater elevations, groundwater production, surface water supply used or available for groundwater recharge, total water use, change in groundwater storage, and annual report submitted to court.

### **General Construction Activity Storm Water Permit**

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ (Construction General Permit), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. The Construction General Permit requires that all developers of land where construction activities will occur over more than 1 acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology/ Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include a:

- Notice of Intent (NOI),
- Risk Assessment,
- Site map,
- SWPPP,
- Annual fee, and
- Signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

## **c. Local Regulations**

### **Water Quality Control Plan**

The Central Coast RWQCB has adopted a Basin Plan for their region of responsibility that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives are established, and programs that maintain or enhance water quality are implemented to ensure the protection of beneficial uses.

The Basin Plan also established implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (SWRCB Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

### **Post-Construction Stormwater Management Requirements**

The Central Coast RWQCB adopted the *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* (Resolution R3- 2013-0032) in July 2013, which outlines runoff reduction and treatment requirements. Specifically, Resolution R3-2013-0032 outlines post-construction requirements (PCRs) for development projects in the Central Coast Region. The PCRs mandate that development projects use Low Impact Development (LID) to detain, retain, and treat runoff. LID incorporates and conserves on-site natural features, together with constructed hydrologic controls to more closely mimic pre-development hydrology and watershed processes.

The County of Santa Barbara Water Resources Division, Project Clean Water, developed the 2012 and the 2013-2018 *Storm Water Management Program Guidance Document for Municipal Stormwater Permits*. These documents provide direction for development and implementation of Best Management Practices (BMP) to address potential stormwater pollution impacts and ensure consistent treatment of water quality, consistent with the NPDES Phase II permit regulations.

The County of Santa Barbara also developed the *Stormwater Technical Guide for Low Impact Development* (Project Clean Water 2017) to assist designers and municipalities with the implementation of the PCRs. The development of the Post-Construction Stormwater Control Measures/LID features throughout the project site would adhere to the requirements of the Technical Guide.

### **Santa Maria Basin Water Rights Adjudication**

Water rights to the Santa Maria Basin have been adjudicated by the five-phase trial Santa Maria Valley Water Conservation District vs. City of Santa Maria, et. al (Superior Court, County of Santa Clara, Case no. 770214). The Superior Court of California, County of Santa Clara, passed down the Stipulation of the Santa Maria Groundwater Basin Litigation in 2008 in order to ensure the Basin's long-term sustainability. Under the Santa Maria Groundwater Basin Adjudication Stipulation, all overlying owners that are also stipulating parties have a prior and paramount overlying right, whether or not yet exercised.

## Low Threat Discharge Permit

The Central Coast RWQCB has a general permit for discharges that pose a low threat to water quality (*Waste Discharge Requirements National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges with Low Threat to Water Quality*; Order No. R3-2017-0042, NPDES No. CAG993001). Its provisions cover discharges of untreated wastewater streams that will not affect receiving water quality, including groundwater dewatering during construction. This permit specifies the discharge prohibitions, receiving water limitations, and monitoring and reporting program requirements for discharges. Permittees are required to monitor their discharges to ensure that water quality standards are not exceeded.

## Grading Code

Development activity in Santa Barbara County must prevent sediment and other construction related pollutants from entering the storm drain. The County regulates discharges from construction activities through permits issued by Planning & Development Department. These include Grading Permits and Land Use Permits.

Chapter 14, Grading Code, of the County Code addresses construction site runoff control and associated inspection and enforcement procedures. The Grading Code is administered under the Building and Safety Division of Planning and Development.

Under the Grading Code, a ministerial permit is required when 50 cubic yards or more are graded. The permit requires submittal of an Erosion and Sediment Control Plan (Section 14-29) to the Building and Safety Division of Planning and Development. In the case where a project is also subject to the requirements of the Construction General Permit, a SWPPP can be submitted instead of an Erosion and Sediment Control Plan.

The Erosion and Sediment Control Plan (or SWPPP) addresses pollution prevention through the use of BMPs to control erosion and non-storm water discharges such as fueling, sawcutting, placing concrete, painting, etc. BMPs appropriate for the Erosion and Sediment Control Plan (or SWPPP) can be selected from the resources listed below.

The requirements of an Erosion and Sediment Control Plan (Section 14-29) include:

1. A delineation and brief description of the proposed practices to retain sediment on the site, including sediment basins and silt traps, and a schedule for their maintenance;
2. The location and a brief description of the surface runoff and erosion control practices to be implemented, including types and methods of applying mulches, hydro seeding, or other slope stabilization methods; construction material and waste management practices to be used, including temporary borrow and waste disposal areas, temporary debris and garbage disposal, and chemical/fuel storage areas.
3. A brief description of the vegetative practices to be used, including types of seeds and the fertilizer and their application rates, dates of seeding and a schedule for maintenance and upkeep, including irrigation.
4. A brief description of reasonable precautionary measures to ensure that vehicles do not track or spill earth materials into public streets and actions necessary to remove such materials if the materials are spilled or tracked.
5. Drainage or erosion and sediment control plans shall include Best Management Practices for control of pollutants from onsite storm water discharges and non-storm water discharges, such



as, the washout of excess construction materials, including but not limited to drywall, grout, gypsum, plaster, mortar and concrete. Water contaminated with wash-out pollutants shall be collected and controlled and shall be removed from the site.

Construction site are inspected regularly by the County to assure the BMPs in place are preventing pollutants from leaving the site (Section 14-18). Failure to implement BMPs may result in a Stop Work Order and is punishable as an infraction or misdemeanor (Section 14-33) or as civil penalty (Section 14-34).

### 4.10.3 Impact Analysis

#### **a. Methodology and Significance Thresholds**

##### **Methodology**

Project impacts to hydrology and water quality are evaluated based on the proposed project's adherence to local, State, and federal standards; the proposed land uses and project design; changes in pre- and post-project stormwater flows; and proposed BMPs for control of surface runoff and reduction of pollutants in stormwater runoff.

##### **Significance Thresholds**

Appendix G of the CEQA guidelines considers a project to have a significant impact related to hydrology and water quality if the project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - a) Result in substantial erosion or siltation on- or off-site.
  - b) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
  - c) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
  - d) Impede or redirect flood flows.
4. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundations.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The proposed project is not located within a 100-year floodplain, areas subject to flood from dam failure, or seiche or tsunami inundation zones. Therefore, the proposed project would not result in risk of release of pollutants due to project inundation, and the associated CEQA guidelines questions (Checklist Questions 3d and 4) are not discussed further in this section. Stormwater runoff would

discharge to irrigation ditches and would not discharge to a receiving water (such as the Santa Maria River) with beneficial uses or water quality objectives, as designated in the Central Coast RWQCB's Basin Plan. The groundwater basin is designated as very-low threat by DWR pursuant to SGMA, and development of a Groundwater Sustainability Plan is not required. For these reasons, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and the associated CEQA guidelines question (Checklist Question 5) is not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a discussion of Checklist Questions 3d, 4, and 5.

Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, hydrology and water quality impacts would be considered significant if the project:

1. Is located within an urbanized area of the County and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
2. Increases the amount of impervious surfaces on a site by 25% or more;
3. Results in channelization or relocation of a natural drainage channel;
4. Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
5. Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
6. Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses of a receiving waterbody;
7. Results in a discharge of pollutants into an "impaired" waterbody that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
8. Results in a discharge of pollutants of concern to a receiving waterbody, as identified by the RWQCB.

There are no natural drainage channels on the project site. Stormwater runoff from the project site discharges to an on-site irrigation ditch with no connection to the Santa Maria River or other receiving water body. The project would not result in the development of any industrial facilities that would involve industrial activities that are regulated under the NPDES Phase I industrial storm water regulations. Therefore, the proposed project would not result in impacts to water quality resulting from the development of such facilities, and the associated County significance thresholds (thresholds 3 through 8) are not discussed further in this section.

As required by the Santa Barbara County Environmental Thresholds and Guidelines Manual, all projects determined to have a potentially significant stormwater quality impact must prepare and implement a SWMP to reduce the impact to the maximum extent practical. The County requires that each SWMP shall include the following:

**Arctic Cold Agricultural Processor and Freezer Project**

1. Identification of potential pollutant sources that may affect the quality of the discharges to storm water;
2. The proposed design and placement of structural and non-structural Best Management Practices (BMPs) to address identified pollutants;
3. A proposed inspection and maintenance program; and
4. A method of ensuring maintenance of all BMPs over the life of the project.

Implementation of BMPs identified in the SWMP generally will be considered to reduce impacts to stormwater quality to a less than significant level.

**b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Impact HWQ-1 CONSTRUCTION ACTIVITIES COULD DEGRADE WATER QUALITY THROUGH INCREASED RATES OF EROSION AND SEDIMENTATION AND INCREASED RISK OF SPILLS. COMPLIANCE WITH NPDES PERMIT AND COUNTY GRADING CODE REQUIREMENTS AND IMPLEMENTATION OF THE REQUIRED SWPPP AND APPLICABLE BMPs WOULD ENSURE THAT POTENTIAL WATER QUALITY IMPACTS DURING PROJECT CONSTRUCTION WOULD BE ADVERSE, BUT LESS THAN SIGNIFICANT.**

Construction activities would disturb approximately 40 acres of land. Grading operations would increase the potential for erosion and sedimentation. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site or to the downstream irrigation ditches. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported off-site via stormwater runoff. Per the County's Environmental Thresholds and Guidelines Manual, disturbance of one (1) or more acres of land or uncontrolled discharges of sediment or other pollutants are considered a significant impact to water quality.

Construction projects of one or more acres are subject to the requirements of the SWRCB's Construction General Permit, which requires preparation and implementation of a SWPPP to control the discharge of pollutants, including sediment, into local surface water drainages. The SWPPP would specify the storm water monitoring and construction BMPs required to minimize water quality degradation. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste.

In addition to NPDES permit requirements, construction activities would be subject to the County's grading code requirements to minimize erosion and associated impacts to water quality. The grading code requires a grading permit and an Erosion and Sediment Control Plan for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects on privately owned land where the transported amount of materials exceeds 50 cubic yards or the cut or fill exceeds three feet in vertical distance to the natural contour of the land. The County accepts a SWPPP in lieu of an Erosion and Sediment Control Plan, as long as the SWPPP contains the requirements of the County's Erosion and Sediment Control Plan.

According to the *Geotechnical Investigation* prepared for the project (Appendix F), groundwater beneath the project site is located greater than 70 feet below the existing grade and overexcavation for building pad would be 6 feet below lowest existing grade. Therefore, it is not anticipated that groundwater would be encountered during excavation, and groundwater dewatering and disposal to land or surface waters would not be required. Therefore, the project would not be required to obtain coverage under the Low Threat to Water Quality permit. Additionally, due to the depth to groundwater, construction activities would not degrade groundwater quality because there is no direct path for pollutants to reach groundwater.

Compliance with NPDES permit requirements and the County's grading code and implementation of the required SWPPP and construction BMPs would ensure that potential impacts related to violation of water quality standards or waste discharge requirements or degradation of surface or ground water quality during project construction would be adverse, but less than significant.

### Mitigation Measures

This impact would be adverse, but less than significant; therefore, no mitigation is required.

**Threshold 1:** Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Impact HWQ-2 OPERATIONAL ACTIVITIES COULD DEGRADE WATER QUALITY THROUGH INCREASED DISCHARGE OF POLLUTANTS OF CONCERN. COMPLIANCE WITH NPDES PERMIT REQUIREMENTS AND IMPLEMENTATION OF THE REQUIRED SWMP AND APPLICABLE BMPs WOULD ENSURE THAT POTENTIAL WATER QUALITY IMPACTS DURING PROJECT OPERATION WOULD BE ADVERSE, BUT LESS THAN SIGNIFICANT.**

According to the *Stormwater Control Plan* prepared for the project (Appendix H), pollutants from a variety of activities could be discharged off-site into the downstream irrigation ditches. Sources of pollutants include illegal dumping of chemicals, vehicles that visit the site, project site maintenance activities, use of pesticides or fertilizers for landscape maintenance, leaching of metals from roof and drains, and littering. Pollutants carried off site during storm events could result in potential water quality impacts.

The project would be required to comply with the requirements of the Phase II MS4 Permit and associated County guidance documents (i.e., the *Post-Construction Stormwater Management Requirements for Development Projects* and the *Stormwater Technical Guide for Low Impact Development*). The Phase II MS4 Permit requires that a SWMP be prepared for projects that create and/or replace 5,000 square feet or more of impervious surface. SWMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff.

The *Stormwater Control Plan* prepared for the project (Appendix H) serves as the project SWMP and specifies the Source Control and LID BMPs proposed for the project. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. Proposed Source Control BMPs include storm drain inlet signage; education of owners, lessees, and operators; preservation of existing trees, shrubs, and groundcover; design of landscaping to minimize irrigation and runoff and promote infiltration; minimizing use of pesticide and fertilizers; use of pest-resistant landscaping; sweeping of plazas, sidewalks, and parking lots; collection of debris from pressure washing; and collection of wash water containing cleaning agents or degreasers.

LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or

impervious storm drains. Proposed LID BMPs include a retention/infiltration basin located along the western boundary of the project site (refer to Section 2.5.11 in Section 2, Project Description). The retention/ infiltration basin would treat and retain all storm water runoff from a 1.2 inch design storm. Additional details of the proposed Source Control and LID BMPs are included in the *Stormwater Control Plan* prepared for the project (Appendix H).

Due to the depth to groundwater, it is not expected that any stormwater that may infiltrate during operation would affect groundwater quality because there is no direct path for pollutants to reach groundwater. Pollutants in stormwater would be filtered out through the retention/infiltration basin and underlying soil prior to infiltration to groundwater. Wastewater generated from the processor would be treated in accordance with State of California water quality standards and would be discharged into a 100,000 sf process wastewater basin on the eastern portion of the project site (refer to 2.5.10 in Section 2, Project Description). The wastewater basin would be designed to infiltrate the water through the soil back to the groundwater basin. On-site wastewater disposal would not affect groundwater quality because the wastewater would be treated prior to infiltration.

The proposed BMPs would target and reduce pollutants of concern from stormwater runoff from the project site in compliance with the Phase II MS4 Permit requirements and associated County guidance documents. Compliance with these NPDES requirements, including incorporation of operational BMPs to target pollutants of concern, would ensure that potential impacts related to violation of water quality standards or waste discharge requirements or degradation of surface and groundwater quality during project operation would be adverse, but less than significant.

### **Mitigation Measures**

This impact would be adverse, but less than significant; therefore, no mitigation is required.

**Threshold 2:** Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

### **Impact HWQ-3 GROUNDWATER EXTRACTION COULD DECREASE GROUNDWATER SUPPLIES AND INCREASED IMPERVIOUS SURFACE AREA COULD INTERFERE WITH GROUNDWATER RECHARGE. POTENTIAL GROUNDWATER IMPACTS WOULD BE ADVERSE, BUT LESS THAN SIGNIFICANT.**

According to the *Geotechnical Investigation* prepared for the project (Appendix F), groundwater beneath the project site is located greater than 70 feet below the existing grade and overexcavation for building pads would be 6 feet below lowest existing grade. Therefore, it is not anticipated that groundwater would be encountered during excavation, and groundwater dewatering or extraction would not be required during construction. Therefore, project construction would not decrease groundwater supplies and or interfere with groundwater recharge.

According to the *Ground Water Analysis* prepared for the project (Appendix I), there is an existing water well located on the project site which is currently used for irrigation purposes. The project would include installation of a new well to service the project site. The proposed project would extract groundwater during project operation for on-site use. For drilling the well as a public water system for the project, approval for the project will be required from the State Water Resources Control Board. Additionally, Environmental Health Services will require a water system technical report, the approval from the State Water Resources Control Board, and testing of the new well before issuing a Zoning Clearance.

According to the *Ground Water Analysis Addendum #2* prepared for the project (Appendix I), the projected annual water demand would be 277.5 acre-feet per year, which accounts for water loss from evaporation. When also accounting for the 60% of the process and cooling water (133 acre-feet per year) that would be returned to the local water aquifers through infiltration, net water demand would be 145 acre feet per year. Assuming that peak water extraction would occur June through August, peak groundwater extraction rates would be approximately 330 gallons per minute. Projected groundwater use for the project would be comparable to the historical water use on the property for farming of row crops over the last 50+ years. Based on the existing average water usage on the 40-acre project site of approximately 160 AFY, an approximately 15 AFY decrease in on-site groundwater demand from existing conditions would occur, which would have little to no impact to groundwater levels in the overall Santa Maria Groundwater Basin. Additionally, any drawdown of groundwater levels would be minimal and localized to the immediate vicinity of the groundwater well. Due to the distance to the nearest off-site wells (approximately 600 feet), drawdown would not affect the local aquifer shared with nearby wells. For these reasons, the proposed project would not substantially decrease groundwater supplies.

The proposed project would increase impervious surface on the project site by 859,086 square feet (19.72 acres), which would decrease infiltration of stormwater runoff. However, the proposed project includes a detention/infiltration basin and a process wastewater basin that would be designed to offset the anticipated decrease in infiltration from the increased impervious surface area. Therefore, the project would not interfere substantially with groundwater recharge. Impacts related to decrease in groundwater supplies and interference with groundwater recharge in a manner that could impede sustainable groundwater management of the basin would be adverse, but less than significant.

### Mitigation Measures

This impact would be adverse, but less than significant; therefore, no mitigation is required.

**Threshold 3:** Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

**Impact HWQ-4 NEW IMPERVIOUS SURFACES WOULD ALTER EXISTING DRAINAGE PATTERNS AND INCREASE STORMWATER RUNOFF. COMPLIANCE WITH COUNTY DESIGN GUIDELINES AND SBCFCWCD REQUIREMENTS FOR POST-DEVELOPMENT PEAK STORMWATER FLOWS AND IMPLEMENTATION OF BMPs AND MAINTENANCE REQUIREMENTS DESCRIBED IN THE PROPOSED PROJECT'S STORMWATER CONTROL PLAN WOULD ENSURE THAT POTENTIAL FLOODING IMPACTS AND IMPACTS TO ON-SITE AND OFF-SITE DRAINAGE WOULD BE ADVERSE, BUT LESS THAN SIGNIFICANT.**

The project site gently slopes to the northwest and storm water runoff is discharged to the existing drainage ditch along the south edge of Betteravia Road. In the existing condition, the entire project site is pervious. The proposed project would increase impervious surface on the project site by 859,086 square feet (19.72 acres), which would increase stormwater runoff from the project site. The proposed project includes a detention/infiltration basin and a process wastewater basin that would be designed to offset the anticipated decrease in infiltration from the increased impervious surface

area. Stormwater runoff would continue to be directed to the on-site drainage ditch. Per the County's Environmental Thresholds and Guidelines Manual, increases in the amount of impervious surfaces on a site by 25% or more are considered a significant impact to hydrology.

Surface water flows travel faster as they run along impermeable surfaces and channelized drainages, which can result in increased peak discharge flows, erosion, stormwater runoff, and risk of flooding. As stormwater runoff increases in flow speed, discharge into downstream drainages can lead to increased soil erosion and sedimentation and degraded water quality. In addition, oils, chemicals, and other contaminants from vehicles, pesticides, fertilizers, dust contaminants, and other urban runoff could be transported to downstream drainages and storm drains during rain events, resulting in potential water quality impacts.

According to the *Flood Control: Drainage Study* prepared for the project (Appendix H), the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD) allows a maximum stormwater discharge of 0.07 cubic feet per second (cfs) per acre of development for a 100-year storm events. The project includes an on-site retention/infiltration basin to reduce peak flows from the project site in compliance with the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD) requirements. The *Stormwater Control Plan* prepared for the project describe the stormwater facility maintenance procedures to ensure that the proposed retention/infiltration facilities maintain the required reduced flow rates and minimize discharge of stormwater contaminants into off-site drainages. These measures would be required to be implemented as a condition of project approval. The *Flood Control: Drainage Study (Preliminary)* and *Stormwater Control Plan* are included in Appendix H.

Compliance with existing design guidelines, applicable SBCFCWCD requirements for post-development peak stormwater flows, and implementation of BMPs and maintenance requirements described in the *Stormwater Control Plan* would ensure that potential flooding impacts and impacts to on-site and off-site drainage would be adverse, but less than significant.

### **Mitigation Measures**

This impact would be adverse, but less than significant; therefore, no mitigation is required.

### **c. Cumulative Impacts**

#### **Water Quality and Drainage**

Cumulative development in the northern portion of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project.

Cumulative development in the northern part of Santa Barbara County would increase impervious surfaces throughout the region, redirect the drainage of surface flow during storm events, and increase pollutant loading, peak flows, erosion, sedimentation, and flooding. Potentially significant cumulative impacts could result from buildout of the region due to increased pollutant loading, storm

flows, erosion and sedimentation, and flooding. Compliance with NPDES and local water quality requirements and Santa Barbara County drainage standards would minimize these potentially significant cumulative impacts. All projects that disturb one acre or more of soil must comply with the requirements of the Construction General Permit and County grading code. Additionally, each project that creates and/or replaces 5,000 square feet or more of impervious surface would be required to comply with the Phase II MS4 Permit. Implementation of a SWPPP or erosion and sediment control plans (for construction), and a SWMP (for operation) would be required for each cumulative project to determine appropriate BMPs to minimize water quality impacts. The proposed project, as well as other cumulative development in northern Santa Barbara County, would be required to prepare a hydrology report and implement drainage facilities to minimize hydrologic impacts consistent with applicable County and state regulations. The design of each project would be subject to SBCFCWCD review and approval relative to accommodating surface flows and retention of runoff on-site. Compliance with the Construction General Permit, County grading code, the Santa Barbara County drainage design guidelines, and the Phase II MS4 requirements would ensure that each individual project would incorporate BMPs and other drainage facilities designed to address drainage and surface water quality protection. As a result, cumulative impacts to water quality, drainage, flooding, and sedimentation would be adverse, but less than significant.

## **Groundwater**

Additional water demand would occur with population growth associated with buildout of the northern part of Santa Barbara County. Potential increase in groundwater pumpage above current levels due to buildout of the region would represent a potentially significant impact, as it would constitute a substantial contribution to ongoing overdraft of the Santa Maria Groundwater Basin. Each project would be reviewed by the County to ensure that adequate water supplies are available to ensure that water supplied from groundwater would not substantially decrease groundwater supplies. As discussed above, the project groundwater use would be comparable to the historical water use on the property for farming and would have little to no impact to groundwater levels in the overall Santa Maria Groundwater Basin and would not contribute to a decline in groundwater supply. Therefore, cumulative impacts to groundwater resources would be adverse, but less than significant.



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## 4.11 Land Use and Planning

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This section is based partially on a preliminary analysis of the project's consistency with goals, policies, actions, and development standards in the Santa Barbara County Comprehensive Plan that are applicable to the various components of the project (Appendix J).

### 4.11.1 Environmental Setting

#### a. Regional Land Use

The project site is located within the County of Santa Barbara, which occupies approximately 2,774 square miles of both urban and rural land uses. The project site lies in northern Santa Barbara County, approximately one mile east of the City of Santa Maria. Santa Maria is a semi-rural, primarily residential community, with scattered commercial, office, and industrial uses throughout the City. Rural and agricultural land uses (such as row crops and grazing lands) occupy the outlying areas of the City and most of the area surrounding the project site. Residential neighborhoods and industrial uses are interspersed among the agricultural lands.

#### b. Project Site Setting

The subject property is located at 1750 East Betteravia Road approximately one mile east of the City of Santa Maria in northern Santa Barbara County. The property is located on the east side of Rosemary Road, approximately 1.1 miles east of U.S. Highway 101 (U.S. 101) and is comprised of two parcels, totaling approximately 109 acres. The property is bound by Rosemary Road on the west, East Betteravia Road on the north, and Prell Road on the south. Active agricultural operations surround the property in all directions. The subject property is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). The existing vegetable cooling plant is located on the southwest portion of the subject property. The property is zoned AG-II (Agricultural II) with a corresponding zoning map symbol of AG-II-40.

The planned ground disturbance for the proposed new processor and freezer facilities ("project site") covers approximately 40 acres on the northeast portion of the subject property. The project site is surrounded in all directions by agricultural uses, including Central City Cooling and row crops located across Betteravia Road to the north and row crops to the east, south, and west. The properties to the north, south, and east are zoned AG-II-40. The property to the west is zoned AG-II-100.

### 4.11.2 Regulatory Setting

Santa Barbara County regulates the design of the built environment through its General Plan and Land Use and Development Code (LUDC). New development is required to be consistent with the General Plan and the County's Comprehensive Plan. Policies from the Land Use Element of the County's Comprehensive Plan that apply to this project include:

#### Land Use Development Policies

- **Policy 4.** Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack

of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

### **Hillside and Watershed Protection Policies**

- **Policy 1.** Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.
- **Policy 2.** All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.
- **Policy 3.** For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.
- **Policy 4.** Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained onsite unless removed to an appropriate dumping location.
- **Policy 6.** Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.
- **Policy 7.** Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

### **Streams and Creeks Policies**

- **Policy 1.** All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.

### **Flood Hazard Area Policies**

- **Policy 1.** All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless offsetting improvements in accordance with federal regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finished floor elevations are two feet above the projected 100-year flood elevation, as well as the other requirements regarding materials and utilities as specified in the Flood Plain Management Ordinance are in compliance.

## **Historical and Archaeological Sites Policies**

- **Policy 1.** All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.
- **Policy 2.** When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
- **Policy 3.** When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed to meet guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.
- **Policy 4.** Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or other cultural sites shall be prohibited.
- **Policy 5.** Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

## **Other Open Lands Policies**

- **Policy 1.** Preservation of open lands shall be encouraged under the Williamson Act.

## **Visual Resources Policies**

- **Policy 1.** All commercial, industrial, and planned developments shall be required to submit a landscaping plan to the County for approval.
- **Policy 5.** Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

As described in the Santa Barbara County Land Use & Development Code (LUDC), the AG-II zone is applied to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area as shown on the County's Comprehensive Plan maps, with the intention of preserving these lands for long-term agricultural use. The AG-II-40 zone expands upon the underlying AG-II zoning to specify that the minimum gross lot area/building site area for development of the property is 40 acres (LUDC Section 35.21.040, County of Santa Barbara 2020). The property is not enrolled in an agricultural preserve (Williamson Act) contract.

### **4.11.3 Impact Analysis**

#### **a. Methodology and Significance Thresholds**

In accordance with the Appendix G of the CEQA guidelines, a project would result in a significant impact if it would:

1. Physically divide an established community; or
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

No project components would divide an established community. Therefore, CEQA guidelines question 1 is not discussed further in this section. Refer to Section 4.15, Effects Found Not to be Significant for a discussion of Checklist Question 1. Project consistency with adopted policies and regulations are addressed in Appendix J.

Land use impacts were assessed based upon the level of physical impact anticipated for the various issues that can affect compatibility (air quality, noise, human health and safety, aesthetics). Although the County does not have “Land Use” thresholds of significance, it does provide guidelines related to “quality of life.” Quality of life is broadly defined as the aggregate effect of all impacts on individuals, families, communities, etc. and on the way those groups function. Quality of life issues, while difficult to quantify, are often primary concerns to the community affected by a project. Examples of these issues include:

- Loss of privacy;
- Neighborhood incompatibility;
- Nuisance noise levels (not exceeding noise thresholds);
- Increased traffic in quiet neighborhoods (not exceeding traffic thresholds); and
- Loss of sunlight/solar access.

The elements comprising quality of life are considered on a case-by-case basis. In accordance with County guidelines, “Where a substantial physical impact to the quality of the human environment is demonstrated, the project’s effect on ‘quality of life’ shall be considered significant.” Therefore, a project would be considered to have a significant land use impact if it meets one of the following criteria:

3. The project is incompatible in scale or use characteristics with any adjacent land uses; or
4. The project would result in land use conflicts that are detrimental to the well-being and privacy of existing uses.

These thresholds are augmented by those contained in Section 4.1, *Aesthetics*; Section 4.2, *Agricultural Resources*; Section 4.3, *Air Quality*; Section 4.12, *Noise*, and Section 4.13, *Transportation and Circulation*, which are primary environmental topics that relate directly to land use compatibility.

## **b. Project Impacts and Mitigation Measures**

**Threshold 2:** Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Impact LU-1 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE POLICIES AND DEVELOPMENT STANDARDS IN THE COUNTY OF SANTA BARBARA’S COMPREHENSIVE PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The County of Santa Barbara’s Comprehensive Plan identifies the project site as Agricultural II (AG-II). As described in the Santa Barbara County Land Use & Development Code (LUDC), the AG-II zone is applied to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area, as shown on the County’s Comprehensive Plan maps, with the intention of preserving these lands for long-term agricultural use. The AG-II-40 zone expands upon the

underlying AG-II zoning to specify that the minimum gross lot area/building site area for development of the property is 40 acres (LUDC Section 35.21.040, County of Santa Barbara 2020).

The proposed project involves a Conditional Use Permit and Development Plan to allow development of a 449,248 square-foot gross floor area agricultural processor and freezer facility on a 40-acre project site located in the northeastern portion of the subject property. Other components of the project include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

The Land Use Element of the County's Comprehensive Plan specifies various policies to minimize environmental effects. Visual Resources Policy 1 requires all commercial, industrial, and planned developments to submit a landscaping plan to the County for approval. All utilities installed for the proposed project would be installed underground, consistent with Visual Resources Policy 5. Compliance with these policies would provide landscape buffering, minimize aesthetic impacts, and ensure compatibility with the adjacent agricultural uses.

As discussed in Section 4.14, *Utilities and Service Systems*, and Section 4.6, *Energy*, and Section 4.13, *Transportation and Circulation*, adequate water, electrical, and natural gas supplies and public roadway capacity are available to serve the project. Additionally, the project would not require a connection to off-site wastewater conveyance or treatment facilities because wastewater would be treated and disposed of on site. As such, the project is consistent with the Land Use Development Policy 4 of the Land Use Element of the County's Comprehensive Plan.

The Hillside and Watershed Protection Policies in the Land Use Element of the County's Comprehensive Plan specify methods to minimize hydrologic and geologic hazards such as erosion, flooding, and landslides. The project would involve grading operations that would result in approximately 64,876 cubic yards (cy) of soil cut and 50,311 cy of soil fill, balancing out to approximately 14,565 cy net soil cut. Due to the generally flat topography of the project site (average slope of less than two percent), a maximum two-foot fill slope is needed to construct the proposed storm water and process water retention infrastructure. This would be consistent with Hillside and Watershed Protection Policy 1 by minimizing cut and fill operations. In addition, as discussed in Section 4.10, Hydrology and Water Quality, the project would be subject to the requirements of the Construction General Permit and Section 14-29 of the Santa Barbara County Code, which requires preparation and execution of a SWPPP and erosion and sediment control plan. The project SWPPP (which would serve as the erosion and sediment control plan) would incorporate applicable County-approved construction best management practices to minimize erosion and sedimentation, prevent spills, and protect water quality, consistent with Hillside and Watershed Protection Policies 2, 3, 4, and 6 and Streams and Creeks Policy 1. Additionally, project operation would comply with the requirements of the Phase II MS4 Permit and associated County guidance documents in order to protect water quality. Operational BMPs, including a retention and infiltration basin, would be implemented consistent with the requirements of Hillside and Watershed Protection Policy 6. Further, as discussed in Section 4.10, Hydrology and Water Quality, the project site is not located within a floodway or floodplain and would therefore be consistent with Flood Hazard Area Policy 1, which prevents development within floodplains and provides standards for developments within floodplains.

The Historical and Archeological Site Policies in the Land Use Element of the County's Comprehensive Plan specify measures to protect archeological or other cultural resources. As discussed in Section 4.5, Cultural and Tribal Cultural Resources, there are no known archaeological or other cultural resources on the project site. However, consistent with the Historical and Archeological Sites policies, adherence to Mitigation Measures CUL-1 through CUL-3 would reduce impacts associated

with the potential to unearth previously undiscovered cultural and tribal cultural resources during grading and construction. Mitigation Measures CUL-1 through CUL-3 describe project-specific requirements that would implement standard County policies to for the proper handling and treatment of cultural and tribal cultural resources. Therefore, the project would be consistent with the policies in the Land Use Element aimed at reducing impacts to cultural resources.

The Other Open Lands Policy 1 of the County’s Comprehensive Plan encourages preservation of open lands under the Williamson Act. The project is consistent with this policy because, as discussed in Section 4.2, Agricultural Resources, the project site and adjacent properties are not listed under the Williamson Act. As such the project would not conflict with a Williamson Act contract.

The project would not conflict with any other applicable policies of the Comprehensive Plan (project consistency with other adopted policies and regulations in the other elements of the Comprehensive Plan are addressed in Appendix J). Overall, land use impacts related to consistency with land use policies contained in the County of Santa Barbara Comprehensive Plan would be less than significant. Therefore, this impact would be less than significant.

### **Mitigation Measures**

No mitigation is required because this impact would be less than significant.

<b>Threshold 3:</b> Would the project be incompatible in scale or use characteristics with any adjacent land uses?
<b>Threshold 4:</b> Would the project result in land use conflicts that are detrimental to the well-being and privacy of existing uses?

**Impact LU-2 THE PROJECT WOULD RESULT IN A CHANGE IN CHARACTER OF THE SITE AND THE SCALE OF DEVELOPMENT ON THE SITE. THIS CHANGE WOULD NOT PRESENT A SIGNIFICANT PHYSICAL IMPACT TO THE QUALITY OF THE HUMAN ENVIRONMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

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The project involves the development of a 449,248 square-foot gross floor area agricultural processor and freezer facility on a 40-acre project site located in the northeastern portion of the 109-acre subject property. The processor and freezer facility would have a maximum building height of 57.4 feet. Development on the project site would not result in any long-term land use compatibility changes that relate to quality of life issues, such as loss of privacy, neighborhood incompatibility, nuisance noise, increased traffic, or loss of sunlight/solar access. Visual compatibility impacts are discussed in more detail in Section 4.1, *Aesthetics*. Noise nuisance impacts are discussed in more detail in Section 4.12, *Noise* and traffic-related impacts are addressed in more detail in Section 4.13, *Transportation and Circulation*.

The project site is currently under agricultural cultivation and provides open views to the hillsides and ridgelines that frame the Santa Maria Valley. The project would introduce new structural development that would alter the existing visual character and obstruct currently unimpeded views of the landscape in a primarily rural and agricultural area. However, the project would not obscure views from a designated scenic view. Additionally, the proposed development would be visually consistent with the existing surrounding rural residential and agricultural uses, including the existing produce processing and cooling warehouse across Betteravia Road to the north. The design and landscaping would be subject to design review and applicable LUDC requirements (e.g., requirement to use colors and exterior finishes that would minimize the effects of a large development on the landscape (LUDC Section 35.21.050 [4b])). Compliance with applicable LUDC requirements would

ensure the project would be visually compatible with nearby structures and the surrounding agricultural landscape. The project would introduce new sources of light and glare. Compliance with LUDC requirements for outdoor lighting (Section 35.30.120) would limit spillover onto adjacent properties and minimize light and glare interference with traffic. For these reasons, the project would not result in a significant change in character of the site and the scale of development on the site or present any quality of life compatibility issues.

The nearest sensitive receivers that are not shielded by a large structure are the single-family residences to the southeast of the project site; these residences are approximately 2,150 feet from the southeast corner of the nearest project building. Operational noise levels at these receivers would not exceed County noise standards. Therefore, the project would not create a noise nuisance that would degrade the long-term land use compatibility changes that relate to quality of life issues.

The on-site circulation plan would be designed pursuant to County design standards to accommodate emergency vehicles, service vehicles, and delivery trucks. The project does not include hazardous transportation design elements, a new traffic signal or major revisions to an existing traffic signal, and would not add traffic to a roadway that has design features that would become a potential safety problem, or otherwise create an unsafe situation. Additionally, as described in Section 4.13, Transportation and Circulation, vehicle trips generated by the project would not exceed the State Office of Planning and Research (OPR) guidelines of 15 percent below existing regional vehicles miles traveled (VMT) per employee specified in the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018). For these reasons, the project would not create a traffic impact that would degrade the long-term land use compatibility changes that relate to quality of life issues.

### **Mitigation Measures**

No mitigation is required because potential impacts to the quality of the human experience would be less than significant.

### **c. Cumulative Impacts**

Other cumulative development in the northern part of Santa Barbara County includes 1,496 new residential units and 94 commercial residential units that are currently proposed, in process, approved, or under construction, in addition to 473,226 square feet of commercial and institutional development and approximately 61,756 square feet of agricultural and winery development. Various other solar, mining, and oil and gas projects are currently in process. Cumulative development in the City of Santa Maria includes 1,128 residential units, 526,579 square feet of mixed-use development with 545 residential units, 529,123 square feet of commercial development, 879,313 square feet of industrial development (with 4.3 million square feet of greenhouses), and a pipeline relocation project. Buildout of Santa Maria and the surrounding area would continue to urbanize the Santa Maria community, and result in additional loss of open space and agricultural areas. Cumulative development in Santa Maria and the surrounding area would also result in short-term construction air and noise emissions, and long-term land use compatibility effects related to quality of life issues, noise and traffic nuisances, aesthetic incompatibility, and agriculture/urban conflicts. Potential land use conflicts would be addressed on a case-by-case basis as individual projects are reviewed by County decision-makers. Implementation of County policies and development standards in the Comprehensive Plan, General Plan, and LUDC related to land use would minimize these potential cumulative impacts. Therefore, cumulative land use impacts would be adverse but less than significant.



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## 4.12 Noise

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### 4.12.1 Environmental Setting

#### a. Overview of Sound Measurement

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by receptors. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy. The perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (eight times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud ([10.5x the sound energy] Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) simply results from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can substantially alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2018). Structures can substantially reduce exposure to noise as well. The FHWA’s guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level ( $L_{eq}$ ); it considers both duration and sound power level.  $L_{eq}$  is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically,  $L_{eq}$  is summed over a one-hour period.  $L_{max}$  is the highest root mean squared (RMS) sound pressure level within the sampling period, and  $L_{min}$  is the lowest RMS sound pressure level within the measuring period (Crocker 2007).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (DNL), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours; it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by DNL and CNEL usually differ by about 1 dBA. The relationship between the peak-hour  $L_{eq}$  value and the DNL/CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65-dBA  $L_{eq}$  range; ambient noise levels greater than 65 dBA  $L_{eq}$  can interrupt conversations (Federal Transit Administration [FTA] 2018).

## **b. Vibration**

Ground-borne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most ground-borne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as ground-borne noise. Ground-borne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although ground-borne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level.

However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in./sec.). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

### **c. Sensitive Receivers**

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. In the County of Santa Barbara, noise sensitive land uses (also referred to as “sensitive receivers”) include: residential, including single and multifamily dwellings, mobile home parks and dormitories; transient lodging, including hotels and motels; hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care; and public or private educational facilities, libraries, churches, and places of public assembly (County of Santa Barbara 2009). Therefore, these types of uses have more stringent noise exposure targets than manufacturing or agricultural uses that are not subject to impacts such as sleep disturbance.

Vibration sensitive receivers are similar to noise sensitive receivers, such as residences, and institutional uses, such as schools, churches, and hospitals. However, vibration sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment, affected by levels that may be well below those associated with human annoyance.

The closest sensitive receivers are located approximately 2,000 feet from the proposed facility location. More specifically, sensitive receivers nearest to the project site include single-family residences located approximately 2,150 feet to the southeast of the southeastern corner of the proposed building, and a single-family residence located off Rosemary Road approximately 2,050 feet to the northwest of the northwestern corner of the proposed building. The Central City Cooling property is located in between the project site and the Rosemary Road residence and would provide substantial noise attenuation from project noise levels.

### **d. Project Site Noise Setting**

The most common source of noise in the project site vicinity is vehicular traffic from East Betteravia Road and nearby agricultural and agricultural-industrial operations. To characterize ambient sound levels at and near the project site, four 15-minute sound level measurements were conducted on September 18, 2020 (see Figure 4.12-1 for the noise measurement locations). The Extech 407780A Type 2 sound level meter was calibrated prior to measurements. Noise Measurement (NM) 1 was taken on the subject property near the southwestern portion of the project site to measure ambient noise levels. A generator was audible near the NM1 measurement location, therefore NM2 was taken on the subject property near the southern portion of the project site to capture ambient noise levels without substantial generator noise. NM3 was taken adjacent to East Betteravia Road to capture traffic noise levels in front of the project site. NM4 was taken off Prell Road, near its intersection with Bridle Trails Lane, southeast of the project site, to capture noise levels at the closest single-family residences to the project site. Table 4.12-1 summarizes the results of the noise measurements, and Table 4.12-2 shows the recorded traffic volumes from NM3 and NM4. It should be noted that traffic may have been lower than historic levels on the roadways due to school and businesses closures from the COVID-19 pandemic. Detailed sound level measurement data are included in Appendix K.

**Table 4.12-1 Project Site Noise Monitoring Results**

Measurement	Location	Sample Times	Approximate Distance to Primary Noise Source	L <sub>eq</sub> (dBA)	L <sub>max</sub> (dBA)	Notes
NM1	Near southwestern portion of the project site (north of existing structures on the subject property)	10:21 – 10:36 a.m.	Approximately 125 feet to on-site generator	67	70	On-site generator dominant noise source
NM2	Near southern portion of project site on subject property	11:09 - 11:24 a.m.	Approximately 400 feet to on-site generator	48	60	Relatively quiet; generator in far distance
NM3	Adjacent to Betteravia Road, northern project site boundary	11:34 – 11:49 a.m.	Approximately 50 feet to centerline of Betteravia Road	70	84	Loading trucks on site audible
NM4	Nearest residences (intersection of Bridle Trails Lane and Prell Road)	12:04 – 12:19 p.m.	Approximately 30 feet to centerline of Prell Road	54	75	Tractor audible

Detailed sound level measurement data are included in Appendix K.

**Table 4.12-2 Sound Level Monitoring Traffic Counts**

Measurement	Roadway	Traffic	Autos <sup>1</sup>	Medium Trucks <sup>2</sup>	Heavy Trucks <sup>3</sup>
NM3	Betteravia Road	15-minute count	65	10	25
		One-hour Equivalent	260	40	100
<b>Percent</b>			<b>65%</b>	<b>10%</b>	<b>25%</b>
NM4	Prell Road	15-minute count	1	2	0
		One-hour Equivalent	4	8	0
<b>Percent</b>			<b>33%</b>	<b>67%</b>	<b>0%</b>

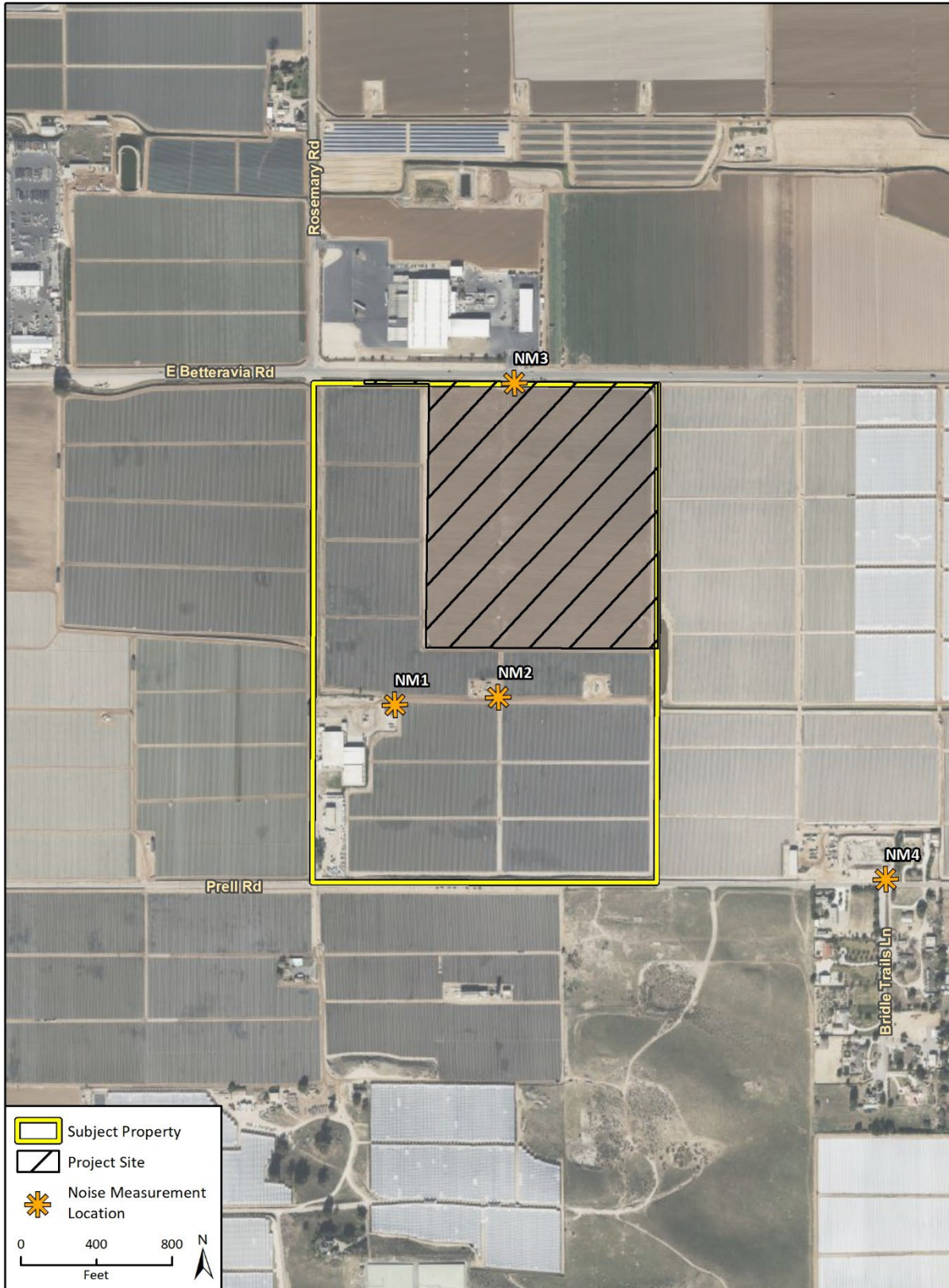
Note: Detailed sound level measurement data are included in Appendix K.

<sup>1</sup> Automobiles: all vehicles with two axles and four tires -- primarily designed to carry nine or fewer people (passenger cars, vans) or cargo (vans, light trucks) -- generally with gross vehicle weight less than 4,500 kg (9,900 lbs).

<sup>2</sup> Medium trucks: all cargo vehicles with two axles and six tires -- generally with gross vehicle weight between 4,500 kg (9,900 lbs) and 12,000 kg (26,400 lbs).

<sup>3</sup> Heavy trucks: all cargo vehicles with three or more axles -- generally with gross vehicle weight more than 12,000 kg (26,400 lbs).

Figure 4.12-1 Noise Measurement Locations



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Fig 4.12-1 Noise Measurement Locations

## **Regulatory Setting**

### **a. Local Regulations**

#### *County of Santa Barbara Code*

Chapter 14 of the County Code regulates construction noise within the County. Chapter 14 does not specify noise level limits; however, Section 14-22 restricts grading activities to daytime hours, which is generally considered the least noise-sensitive time. Section 14-22 states:

No grading work (except for emergency operations), which requires a grading permit under the provisions of this chapter shall take place between the hours of 7:00 p.m. and 7:00 a.m. (or as required within the land use permit), unless the director finds that such operation is not likely to cause significant public nuisance or must, by necessity, be accomplished at other times and authorizes such night operations in writing.

#### *County of Santa Barbara Comprehensive Plan and Environmental Thresholds and Guidelines Manual*

The County of Santa Barbara has adopted noise policies in its Comprehensive Plan Noise Element (adopted 1979, republished May 2009). These policies establish both interior and exterior noise limits for noise compatibility, which are identified in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (County 2020). The thresholds identify noise-sensitive land uses as:

1. Residential, including single- and multi-family dwellings, mobile home parks, dormitories, and similar uses.
2. Transient lodging, including hotels, motels, and similar uses.
3. Hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care.
4. Public or primary educational facilities, libraries, churches, and places of public assembly.

The noise level standard for outdoor living areas of new noise-sensitive land uses is 65 dBA CNEL. Outdoor living areas generally include backyards of single-family residences and individual patios or common outdoor activity areas of multi-family developments. The maximum noise exposure for indoor living areas in new noise-sensitive land uses is 45 dBA CNEL.

To reduce construction impacts, the County of Santa Barbara Environmental Thresholds and Guidelines Manual (County 2020) indicates that construction within 1,600 feet of sensitive receivers shall be limited to weekdays between the hours of 8:00 a.m. and 5:00 p.m.

## 4.12.2 Impact Analysis

### a. Methodology and Significance Thresholds

#### Methodology

##### *Construction Noise*

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the  $L_{eq}$  of the operation (FHWA 2018). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels.

##### *Ground-borne Vibration*

Operation of the proposed project would not include any substantial vibration sources. Therefore, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation of the project site. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020, FTA 2018). Table 4.12-3 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

**Table 4.12-3 Vibration Levels Measured during Construction Activities**

Equipment	PPV at 25 ft. (in./sec.)
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003

Source: FTA 2018

Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities, such as blasting, pile-driving, vibratory compaction, demolition, drilling, and excavation, are based on information contained in Caltrans' *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020). Maximum recommended vibration limits by the American Association of State Highway and Transportation Officials (AASHTO) are identified in Table 4.12-4.



**Table 4.12-4 AASHTO Maximum Vibration Levels for Preventing Damage**

Type of Situation	Limiting Velocity (in./sec.)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

Based on AASHTO recommendations, limiting vibration levels to below 0.4 in./sec. PPV at residential structures would prevent structural damage (plastered walls are indicative of construction processes that have not been common for over 100 years and are therefore not anticipated to be near project construction). These limits are applicable regardless of the frequency of the source. However, as shown in Table 4.12-5 and Table 4.12-6, potential human annoyance associated with vibration is usually different if it is generated by a steady state or a transient vibration source.

**Table 4.12-5 Human Response to Steady State Vibration**

PPV (in./sec.)	Human Response
3.6 (at 2 Hz)–0.4 (at 20 Hz)	Very disturbing
0.7 (at 2 Hz)–0.17 (at 20 Hz)	Disturbing
0.10	Strongly perceptible
0.035	Distinctly perceptible
0.012	Slightly perceptible

Source: Caltrans 2020

**Table 4.12-6 Human Response to Transient Vibration**

PPV (in./sec.)	Human Response
2.0	Severe
0.9	Strongly perceptible
0.24	Distinctly perceptible
0.035	Barely perceptible

Source: Caltrans 2020

As shown in Table 4.12-5, the vibration level threshold at which steady vibration sources are considered to be distinctly perceptible is 0.035 in./sec. PPV. However, as shown in Table 4.12-6, the vibration level threshold at which transient vibration sources (such as construction equipment) are considered to be distinctly perceptible is 0.24 in./sec. PPV. This analysis uses the distinctly perceptible threshold for purposes of assessing vibration impacts.

Although ground-borne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors and the vibration level threshold for human perception is assessed at occupied structures (FTA 2018). Therefore, vibration impacts are assessed at the structure of an affected property.

### Operational Noise Sources

The primary noise sources associated with operation of the proposed project would be exterior operations of rooftop mechanical equipment (e.g., condensers), boilers, forklifts, and a diesel fire pump engine. Assumptions for these noise sources are discussed below.

#### MECHANICAL EQUIPMENT

Condensers used on the project would be Evapco ATC01915E models with 60 horsepower motors. The condensers would generate a sound power level of 106 dBA; noise specifications for the condensers are shown in Table 4.12-7. The project application indicates there would be two condensers above the machine room and three condensers above the mechanical room on the processor side.

**Table 4.12-7 Condenser Noise Levels**

Noise Levels in dB <sup>1</sup> Measured at Octave Frequencies								Overall Noise Level in A-Weighted Scale (dBA) <sup>1</sup>
63 Hz	125 Hz	250 Hz	500 Hz	1 KHz	2 KHz	4 KHz	8 KHz	
111	112	110	104	96	92	90	90	106

<sup>1</sup> Noise levels for a 60-horsepower Evapco ATC01915E (see Appendix K for specification sheets).

Hz = Hertz; KHz = kilohertz

#### BOILERS

The proposed project would utilize five boilers to heat water for pasteurizers and evaporators for pasteurized products and puree concentrates. The five boilers would include four 100 horsepower (hp) Miura low-NO<sub>x</sub> boilers and one 300 hp Miura low-NO<sub>x</sub> boiler. The boilers would be used for 24 hours/6 days a week during the peak season (April through October) and 24 hours/5 days a week during the off-season (January through April). Noise specifications for a typical boiler were assumed to be 88 dBA at a distance of three feet from the source, and were obtained from a CED Engineering (2013) and are shown in Table 4.12-8.

**Table 4.12-8 Boiler Noise Levels**

Noise Levels in dB <sup>1</sup> Measured at Octave Frequencies									Overall Noise Level in A-Weighted Scale (dBA) <sup>1</sup>
32Hz	63 Hz	125 Hz	250 Hz	500 Hz	1 KHz	2 KHz	4 KHz	8 KHz	
90	90	90	87	84	82	80	76	70	88

<sup>1</sup> Noise levels from CED Engineering 2013 (see Appendix K for specification sheets), measured at three feet from the source.

Hz = Hertz; KHz = kilohertz

#### FORKLIFTS

The four forklifts would operate 365 days for 24 hours per day. The most similar piece of equipment in RCNM to a forklift would be a front end loader, which generates a noise level of 79 dBA L<sub>max</sub> at 50 feet. This value was used as a proxy for a forklift.

#### DIESEL PUMP ENGINE

The project's diesel pump engine would be a Clarke JW6H-UFADD0, with a 351-horsepower motor. The pump engine would generate a noise level of 109 dBA at 1 meter, as shown in Table 4.12-9.

**Table 4.12-9 Diesel Fire Pump Noise Levels**

Noise Levels in dB <sup>1</sup> Measured at Octave Frequencies										Overall Noise Level in A-Weighted Scale (dBA) <sup>1</sup>
32Hz	63 Hz	125 Hz	250 Hz	500 Hz	1 KHz	2 KHz	4 KHz	8 KHz	16 KHz	
65	68	79	90	97	100	105	101	98	97	109

<sup>1</sup> Noise levels for Clarke JW6H-UFADD0 (see Appendix K for specification sheets), measured at one meter from the source.

Hz = Hertz; KHz = kilohertz

### Significance Thresholds

Appendix G of the CEQA guidelines considers a project to have a significant noise impact if the project would result in:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Generation of excessive ground-borne vibration or ground-borne noise levels; and/or
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

The project site is not within the noise contours for any airport or private airstrip; therefore, no impacts would occur related to exposure to construction workers or users of the project site from aircraft noise. Checklist Question 3 is discussed in Section 4.15, Effects Found Not to be Significant, and is not discussed further in this section.

The following thresholds are based on the Santa Barbara County Environmental Thresholds and Guidelines Manual (County 2020):

- Construction noise would be significant if:
  - Grading and construction activity would occur within 1,600 feet of sensitive receivers or exposes sensitive receivers to noise levels exceeding 65 dBA CNEL.
- Operational noise would be significant if:
  - If existing exterior noise levels experienced by sensitive receivers is below 65 dBA CNEL, the project increases noise levels to exceed 65 dBA CNEL at these receivers; or
  - If existing exterior noise levels experienced by sensitive receivers exceeds 65 dBA CNEL, the project increases noise levels by 3 dBA CNEL at these receivers; or
  - If existing interior noise levels experienced by sensitive receivers is below 45 dBA CNEL, the project increases noise levels to exceed 45 dBA CNEL at these receivers; or
  - If existing interior noise levels experienced by sensitive receivers exceeds 45 dBA CNEL, the project increases noise levels by 3 dBA CNEL at these receivers.

For project-generated vibration, impacts would be considered significant if project-generated vibration would affect vibration-sensitive land uses to excessive ground-borne vibration to an unacceptable increase in noise levels. The following thresholds based upon FTA and Caltrans' recommendations were used to determine whether vibration levels would be unacceptable:

- If the project would subject vibration-sensitive land uses to construction-related ground-borne vibration that exceeds the distinctly perceptible vibration annoyance potential criteria for

human receivers of 0.24 in./sec. PPV, or the residential structural damage criteria of 0.4 in./sec. PPV.

## b. Project Impacts and Mitigation Measures

**Threshold 1:** Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

### **Impact N-1 CONSTRUCTION NOISE WOULD NOT EXCEED COUNTY STANDARDS AT THE NEAREST SINGLE-FAMILY RESIDENCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

Construction activity would result in temporary noise in the project area, exposing surrounding sensitive receivers to increased noise levels. The project would involve site preparation, grading, building construction, paving, and architectural coating. Construction noise would typically be higher during the heavier periods of initial construction (i.e., grading) and would be lower during the later construction phases. Typical heavy construction equipment during project grading could include dozers, backhoes, excavators, scrapers, and graders. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour operating day.

A potential construction scenario includes a dozer and a grader working to grade the site. Therefore, a dozer and a grader were analyzed together for construction noise impacts due to their likelihood of being used at the same time. Site grading using a dozer and a grader is a reasonable scenario for the greatest noise generation during construction. At a distance of 100 feet, a dozer and a grader would generate a combined noise level of 77 dBA  $L_{eq}$  (RCNM calculations are included in Appendix K).

The nearest sensitive receivers to project construction are the single-family residences located approximately 1,650 feet from the southeast corner of the project site. This distance was used in the analysis as the potential closest distance that construction would occur to the project site, as equipment may be used in this area for grading operations. At a distance of 1,650 feet, grading operations would generate a noise level of 52 dBA  $L_{eq}$  (RCNM calculations are included in Appendix K). This noise level would not exceed the County's 65 dBA standard for outdoor living areas; in addition, construction would not occur within 1,600 feet of sensitive receivers, the distance specified by the County as potentially resulting in a significant construction noise impact. Therefore, construction noise impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures are required because construction noise impacts would be less than significant.

**Threshold 1:** Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Impact N-2 OPERATIONAL NOISE WOULD NOT EXCEED COUNTY STANDARDS AT THE NEAREST SINGLE-FAMILY RESIDENCES OR ANY OTHER SENSITIVE RECEIVERS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

#### *On-site Operational Noise Sources*

The project would introduce sources of operational noise to the site, including boilers, forklifts, a diesel fire pump engine, and condensers. Operational assumptions for these noise sources are discussed in Section 4.12.2(a), Methodology and Significance Thresholds. The nearest sensitive receiver is a residence located to the northwest off Rosemary Road at a distance of approximately 2,050 feet. A large building is located in between the project site and this residence; therefore, noise levels at the residence would be attenuated by the structure. The nearest sensitive receivers that are not shielded by a large structure are the single-family residences to the southeast of the project site; these residences are approximately 2,150 feet from the southeast corner of the nearest project building. As a conservative analysis, project noise levels were assumed to generate from the project site boundary nearest to sensitive noise receivers. Actual distances during operation would potentially be further from receivers (e.g., on the rooftops or other further portions of the project site). In addition, noise sources may be further shielded from noise by the proposed new structure on the project site. In addition, this analysis conservatively assumes all on-site noise sources would operate simultaneously.

Noise levels from these sources are shown individually and combined at the nearest sensitive receiver in Table 4.12-10. As shown in the table, with the conservative operational noise source assumptions described above, noise levels would be approximately 57 dBA Leq at the nearest single-family residence to the southeast. Assuming a conservative 5 dBA reduction due to building shielding, noise levels would be approximately 52 dBA Leq at the nearest single-family residence to the northwest. Assuming these noise levels are created over all hours of the daytime, evening, and nighttime, this would equate to 64 dBA CNEL and 59 dBA CNEL, which would be below the County's exterior noise standard of 65 dBA CNEL. Per the FHWA, modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA (FHWA 2018); assuming a 20 dBA exterior-to-interior reduction would result in an interior noise level of 44 dBA CNEL at the nearest residence to the southeast and 39 dBA CNEL at the nearest residence to the northwest, which would also be below the County's interior noise standard of 45 dBA CNEL. Therefore, potential noise impacts from on-site operation of the project would be less than significant.

**Table 4.12-10 Operational Noise Levels at Off-site Receivers**

Equipment	Source Noise Level for One Unit (dBA)	Distance from Source for Source Noise Level	Exterior Noise Levels at Nearest Sensitive Receiver <sup>1</sup> for One Unit (dBA L <sub>eq</sub> )		Exterior Noise Level at Nearest Sensitive Receiver <sup>1</sup> for All Units <sup>2</sup> (dBA L <sub>eq</sub> )	
			2,050 feet <sup>3</sup>	2,150 feet	2,050 feet <sup>3</sup>	2,150 feet
Boilers	88	3 feet	26	31	33	38
Condensers	106	Sound Power Level	37	42	44	49
Diesel Pump Engine	109	1 meter	48	53	48	53
Forklift	79.1	50 feet	42	46	48	52
Combined Exterior Noise Level (dBA L <sub>eq</sub> )					52	57
<b>Combined Exterior Noise Level (dBA CNEL)<sup>4</sup></b>					<b>59</b>	<b>64</b>
<b>Combined Interior Noise Level (dBA CNEL)<sup>5</sup></b>					<b>39</b>	<b>44</b>

<sup>1</sup> The nearest sensitive receiver are single-family residences located approximately 2,150 feet from the southeastern corner of the project building.

<sup>2</sup> The following number of each equipment is assumed: five boilers, five condensers, one diesel pump engine, and four forklifts.

<sup>3</sup> A large building is located in between the project site and this residence; therefore, noise levels at the residence would be heavily attenuated by the structure, and a conservative assumption of a 5 dBA reduction due to attenuation was used.

<sup>4</sup> dBA CNEL calculations assume all equipment is running continuously during the daytime, evening, and nighttime hours.

<sup>5</sup> Interior noise levels assume a 20 dBA exterior-to-interior reduction (FHWA 2018).

### Off-site Traffic Noise

According to the project’s Air Quality and Greenhouse Gas Analysis, the project would result in 1,379 new vehicle trips per day on area roadways (LSA 2020; Appendix C). Traffic observations from 2018 counted 38,454 vehicles on Betteravia Road near the U.S. Highway 101 interchange (City of Santa Maria 2018b). The project’s additional 1,379 vehicles on this roadway would result in an approximate four percent increase in traffic, which would result in a noise level increase of approximately 0.2 dBA. Therefore, the project’s traffic noise increases would not exceed 3 dBA, which is the threshold for a noticeable noise increase. Accordingly, potential noise impacts from any off-site traffic noise increase would be less than significant.

### Mitigation Measures

No mitigation measures are required because operational noise impacts would be less than significant.

**Threshold 2:** Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

### Impact N-3 VIBRATION FROM CONSTRUCTION ACTIVITIES WOULD BE WELL BELOW VIBRATION THRESHOLDS AT THE NEAREST RESIDENCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which is conservatively assumed to occur at a distance of 1,650 feet of the nearest off-site residential structures to the southeast. A dozer would create approximately 0.089 in/sec PPV at a distance of 25 feet (Caltrans 2020). This would attenuate to 0.001 in/sec PPV at a distance of 1,650 feet. This would be much lower than what is considered a

distinctly perceptible impact for humans of 0.24 in/sec PPV and the structural damage impact of 0.4 in/sec PPV. Therefore, temporary vibration impacts associated with the dozer (and other potential equipment) would be less than significant.

Operation of the project would not include any substantial vibration sources. Therefore, operational vibration impacts would be less than significant.

### **Mitigation Measures**

No mitigation measures are required because vibration impacts would be less than significant.

### **c. Cumulative Impacts**

Construction noise and vibration are localized and rapidly attenuate within an urban environment. Although some cumulative projects listed in Table 3-1 in Chapter 3, Environmental Setting, may be under construction at the same time as the proposed project, these projects are not located in close enough proximity to the project site such that noise and vibration from construction activities would impact the same sensitive receivers. Therefore, no cumulative construction noise or vibration impacts would occur.

Some cumulative projects listed in Table 3-1 would include similar operational noise sources as the proposed project (e.g., mechanical equipment noise). Operational noise from these sources is localized and rapidly attenuates due to the effects of distance, intervening structures, and topography that block the line of sight. In addition, other noise sources closer to receivers would obscure project-related noise. Cumulative projects are not located in close enough proximity to the project site such that operational noise would impact the same sensitive receivers. As discussed in Impact N-2, the project's additional vehicles on area roadways would not result in a noticeable off-site traffic noise increase. The project's contribution to cumulative off-site traffic noise would be audible, which would be cumulatively considerable. Therefore, no cumulative operational noise impacts would occur.

## 4.13 Transportation and Circulation

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This section presents existing and future transportation/traffic conditions for the project study area and identifies potential transportation/traffic impacts resulting from implementation of the project. Study area circulation system facilities are discussed, and effects of project traffic on vehicle miles traveled (VMT) conditions are evaluated. This analysis is based on *The Arctic Cold Storage and Packing Project Impact Study* (TIS) prepared by Associated Transportation Engineers (ATE) and the *Arctic Cold VMT Analysis*, prepared by Fehr & Peers. Both reports are included in Appendix L.

### 4.13.1 Environmental Setting

#### a. Existing Transportation System

##### Existing Street System

The existing transportation system is composed of highways, arterial roadways, collector streets, and their associated bicycle and pedestrian facilities. The study area for traffic and transportation analyses includes the following three main roadway segments surrounding the project site (Appendix L):

- U.S. Highway 101 (U.S. 101) located west of the project site
- East Betteravia Road north of the project site
- Rosemary Road west of the project site

These roadway segments are described in greater detail below.

##### *Highway System*

##### **U.S. HIGHWAY 101**

U.S. 101, located approximately 1.1 miles west of the project site, is a multi-lane interstate freeway serving the Pacific Coast. U.S. 101 is the principal route between the City of Santa Maria and the Five Cities area and San Luis Obispo to the north, and Orcutt, Buellton and Santa Barbara to the south. Access to U.S. 101 from the project site is provided via the U.S. 101/Betteravia Road interchange.

##### *Arterial Roadways*

##### **BETTERAVIA ROAD**

Betteravia Road, located along the northern project site boundary, is an arterial roadway. Arterial streets carry through traffic and connect to the state highway system with restricted access to abutting properties. They are designated to have the highest traffic carrying capacity in the roadway system with the highest speeds and limited interference with traffic flow by driveways. Betteravia Road is a 6-lane arterial road west of U.S. 101, a 4-lane arterial road between U.S. 101 and Nicholson Avenue just east of U.S. 101, and a 2-lane arterial road between Nicholson Avenue and Rosemary Road. The 6-lane segment west of U.S. 101 traverses the City of Santa Maria. The 4-lane segment east of U.S. 101 serves a truck stop and service stations. The 2-lane segment between Nicholson Avenue and Rosemary Road serves primarily agricultural uses. Access to the project site would be provided via two driveways on the southern side of Betteravia Road.



## *Collector Streets*

### **ROSEMARY ROAD**

Rosemary Road west of the project site is a collector street in the immediate vicinity of the project. Collector streets serve as intermediate routes to handle traffic between local streets and streets of higher classification. Collector streets also provide access to abutting property and are two lanes in width. Collector streets may handle some localized through traffic from one local street to another; however, their primary purpose is to connect the local street system to the arterial network. Rosemary Road is a 2-lane collector road that extends between Jones Street on the north and its terminus south of Betteravia Road. Rosemary Road serves mostly agricultural uses.

### **Existing Public Transit**

The Santa Barbara Metropolitan Transit District (MTD) provides public bus transit services in the City and throughout Santa Barbara County. MTD operates 24 lines throughout the County with three of these lines being express lines. MTD does not currently service northern Santa Barbara County.

The City of Santa Maria, located approximately 1 mile west of the project site, is serviced by the City's local transit provider, Santa Maria Area Transit (SMAT). Additionally, the City of Santa Maria operates The Breeze, a commuter bus service that provides transit service from Santa Maria to Vandenberg Air Force Base, Lompoc, Los Alamos, Buellton, and Solvang. The closest transit line to the project site is SMAT Route 3 that provides service initiating at the Santa Maria Transit Center located on the southeast corner of East Boone Street and Miller Street, and stopping at the Marian Regional Medical Center located at 1400 East Church Street, approximately 2.25 miles north of the project site. There are no bus routes or bus stops in the vicinity of the project site.

### **Existing Bicycle/Pedestrian Facilities**

Pedestrian facilities include sidewalks, crosswalks, multi-use paths, and pedestrian signals at signalized intersections. Bicycle facilities consist of Class I, II, and III bikeways. Class I shared-use paths or bike paths are facilities with right-of-way separated from roadways. Class II bike lanes provide a striped lane for one-way bicycle travel on the side of the street adjacent to vehicle traffic. Class III bike routes consist of a roadway that is shared between bicycle and vehicle traffic with supplemental bike signage. No pedestrian sidewalks or other related infrastructure exist within the immediate surrounding street network of the project site due to the remote agricultural nature of the project area. Bicycle facilities in the immediate vicinity of the project site include Class II bicycle lanes along Betteravia Road.

### **Existing VMT**

Vehicle miles traveled (VMT) refers to the amount and distance of automobile travel in a given area. Daily VMT per employee (also referred to as "home-based work VMT per employee") is the average number of vehicle miles that an employee in a given area travels between home and work per day. Existing VMT per employee for unincorporated Santa Barbara County was identified in the *Arctic Cold VMT Analysis* (Appendix L). The existing County average VMT was 15.8 VMT/employee in 2021.

## 4.13.2 Regulatory Setting

### a. State Regulations

#### California Department of Transportation

Caltrans manages the operation of state highways including U.S. 101, which runs west of the project site.

#### Senate Bill (SB) 743

Adopted in 2013, Senate Bill (SB) 743 required the Governor's Office of Planning and Research (OPR) to develop new CEQA guidelines that address transportation impact metrics under CEQA. A key provisions of SB 743 included reforming California Environmental Quality Act (CEQA) analysis for transportation by replacing the measurement of automobile delay (i.e. level of service [LOS]) with VMT as a metric the used for measuring environmental impacts. Under SB 743, the focus of the environmental impacts of transportation shift from driver delay to reduction of greenhouse gas (GHG) emissions, creation of multimodal networks, and promotion of a mix of land uses, and LOS standards become local policy thresholds as adopted among individual agencies.

### b. Regional and Local Regulations

#### Santa Barbara County Association of Governments Regional Transportation Plan (SBCAG RTP)

The SBCAG RTP is a long-range planning document for the region's transportation system. The RTP analyzes the transportation needs of the region into the future and identifies project priorities in order to improve the transportation system. The RTP offers a mix of mobility options and commits to a more sustainable transportation system through investments in public transportation, active transportation, highways, streets, and roads, and system efficiency.

#### Santa Barbara County Comprehensive Plan

The County of Santa Barbara Comprehensive Plan is intended to guide the land use and transportation networks by providing goals, policies, and action items to specify how the transportation system in the County will grow and improve into the future. Policy E is the only Comprehensive Plan policy that is applicable to the project in relation to the analysis of transportation impacts:

**Policy E:** A determination of project consistency with the standards and policies of the Circulation Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development Policy #4 with regard to roadway and intersection capacity.

## 4.13.3 Impact Analysis

### a. Methodology and Thresholds of Significance

#### Methodology

The project-specific analysis is based on the TIS prepared by ATE and the Arctic Cold VMT Analysis, prepared by Fehr & Peers (Appendix L). The project's average VMT per employee was calculated using the Santa Barbara County Association of Governments' (SBCAG) Regional Travel Demand Model

(RTDM). The SBCAG RTDM estimates VMT for 2010 and 2040; therefore, VMT estimates for baseline conditions (2021) were interpolated between the 2010 base year and 2040 future year.

### **Thresholds of Significance**

To determine whether a project would result in a significant transportation impact, Appendix G of the CEQA Guidelines requires consideration of whether a project would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, would result in a VMT impact as described in Table 14.6.2; subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
4. Result in inadequate emergency access.

The updated CEQA Guidelines and SB 743 changed the criteria for determining what constitutes a significant transportation-related environmental impact to rely upon quantification of VMT instead of level of service. CEQA Guidelines Section 15064.3(c) states that the requirement to use the VMT criteria applies on and after July 1, 2020. In September 2020, Santa Barbara County approved an amendment to the *Santa Barbara County Environmental Thresholds and Guidelines Manual*, which included adoption of VMT thresholds of significance and analysis methodologies. The County adopted the same thresholds as those recommended in the Office of Planning and Research guidelines. For an “employment” project type, a project would have a significant VMT impacts if the project VMT exceeds a level of 15 percent below the existing County VMT per employee. The existing County average VMT was 15.8 VMT/employee in 2021. Therefore, the threshold of significance for VMT for the project is 13.4 VMT/employee, which is 15 percent below the County average of 15.8 VMT/employee.

### **b. Project Impacts and Mitigation Measures**

**Threshold 1:** Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Impact T-1 ALL FRONTAGE ROAD IMPROVEMENTS WOULD BE DESIGNED AND REVIEWED PER THE COUNTY’S BUILDING AND CIRCULATION STANDARDS TO REDUCE CONFLICT BETWEEN VEHICLES AND PEDESTRIANS/BICYCLES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The project does not propose elements or aspects that would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. There are no sidewalks or pedestrian facilities in the immediate vicinity of the project site. A Class II bike lane runs along Betteravia Road immediately adjacent to the project site. The project proposed frontage improvements on Betteravia Road include the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site. Additionally, all project site design features, including but not limited to roadway designs and driveway access to adjacent streets would be subject to review and approval by the County Transportation Division at the time improvement plans are submitted. Established County review processes would ensure that project driveway access control and sight distance

standards conform to County safety standards, which would minimize potential pedestrian/vehicle conflicts at the driveway intersections.

The closest public transit bus stop is 2.25 miles north of the project site. There are no public transit services in the immediate vicinity of the project site. The project may result in a long-term increase in demand for public transportation as increased employment opportunities become available on-site. However, a majority of employees generated by this project are expected to be residents of surrounding communities from the City of Santa Maria or Orcutt, and approximately 25 percent would carpool to the site (Appendix L). Therefore, the project would not conflict with local public transit service.

Given the above considerations, the project would not conflict with a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities. Therefore, this impact would be less than significant.

### Mitigation Measures

No mitigation measures are required because this impact would be less than significant.

**Threshold 2:** Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

**Impact T-2 THE PROJECT WOULD GENERATE 9.3 VMT/EMPLOYEE. THE COUNTY'S AVERAGE VMT/EMPLOYEE IS APPROXIMATELY 15.8. THEREFORE, THE PROPOSED PROJECT WOULD NOT EXCEED THE APPLICABLE THRESHOLD OF 15 PERCENT BELOW EXISTING REGIONAL VMT/EMPLOYEE (13.4 VMT/EMPLOYEE). THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The project would generate new VMT as a result of employee trips and operational trips from produce shipping to and from the proposed freezer and processor facility. Overall, the proposed facility would reduce operational VMT because local agricultural operations are currently transporting produce to more distant freezer and processor facilities. Therefore, the primary source of increased VMT resulting from the project would be employee trips.

As stated above under Section 4.13.3(a), Methodology and Thresholds of Significance, the existing regional VMT per employee was calculated using the SBCAG RTDM. The analysis assumes that during the non-harvest season (August to May) and harvest season (May to August), the project would require 153 and 623 employees, respectively. Based on project specific vehicle trip generation and trip characteristic data, the project would be expected to generate 9.3 VMT per employee per day. The project's projected VMT/employee compared to the County's VMT threshold is shown below in Table 4.13-1.

**Table 4.13-1 Project VMT Comparison to County Average VMT**

Project VMT Estimate	VMT Threshold (15 percent below County average VMT)	Exceeds VMT Threshold?
9.3 VMT/Employee	13.4 VMT/Employee	No

Source: Fehr & Peers 2021

As stated previously, the County VMT significance threshold states that a project's VMT generation would be less than significant if it does not exceed 15 percent below existing VMT/employee. The existing County average VMT was 15.8 VMT/employee in 2021. Therefore, the threshold of

significance for VMT for the project is 13.4 VMT/employee. The proposed project's projected VMT/employee of 9.3 would not exceed the VMT threshold of 13.4 VMT/employee.

The project's VMT impact would be less than significant.

### **Mitigation Measures**

No mitigation measures are required because this impact would be less than significant.

<p><b>Threshold 3:</b> Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?</p>
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<p><b>Threshold 4:</b> Would the project result in inadequate emergency access?</p>
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**Impact T-3 THE PROJECT'S FRONTAGE IMPROVEMENTS WOULD BE REQUIRED TO COMPLY WITH COUNTY STANDARDS AND WOULD THEREFORE NOT HINDER EMERGENCY ACCESS OR SUBSTANTIALLY INCREASE HAZARDS. THESE IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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Access to the project site would be provided via two new driveways along Betteravia Road. The project's frontage improvements would include widening Betteravia Road to provide a separate right-turn lane at both of the driveways, improving emergency access along this route. The frontage and driveway improvements would be designed pursuant to Santa Barbara County standards and would be reviewed for consistency with applicable County standards by the County Transportation Division (ATE 2020). The driveway widths would comply with emergency access standards and be reviewed by the Santa Barbara County Fire Department for consistency with applicable fire safety codes and emergency access requirements. In addition, with the frontage and driveway improvements designed in compliance with applicable standards and reviewed by the County, the project would not introduce improvements that would substantially increase hazards due to a geometric design feature. The project would also not introduce new incompatible uses, such as farm equipment, to public roadways. Based on the proposed configuration of the driveways and frontage improvements included as part of the project design and compliance with applicable fire safety codes and emergency access requirements, impacts related to hazards associated with design features, emergency access, or incompatible uses would be less than significant.

### **Mitigation Measures**

No mitigation measures are required because these impacts would be less than significant.

### **c. Cumulative Impacts**

Based on technical guidance from the Governor's Office of Planning and Research, if a project has a less than significant impact on VMT using an efficiency-based threshold (e.g., VMT per resident), the project would not contribute to a cumulative VMT impact (OPR 2018). As discussed in Impact T-2, the project is expected to generate 9.3 VMT/employee, which would not exceed the VMT threshold of 13.4 VMT/employee. As such, the project would have a less than significant impact on VMT and would not result in a considerable contribution to a cumulative VMT impact.

Potential impacts associated with emergency access and transportation hazards would be site-specific and would not have corresponding cumulative effects.

## 4.14 Utilities and Service Systems

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This section analyzes the potential impacts to utilities and service systems, including water, wastewater, stormwater, electric power, natural gas, telecommunication facilities and solid waste, related to construction and operation of the project. The background information and analysis in this section is based partially on the *Ground Water Analysis* and addenda prepared for the project by Katherman Exploration CO, LLC in March and October 2020 (Appendix I).

### 4.14.1 Environmental Setting

#### a. Water

##### **Santa Maria Groundwater Basin**

As described in detail in Section 4.10, *Hydrology and Water Quality*, the Santa Maria Groundwater Basin underlies the Santa Maria Valley, Nipomo Mesa, Tri-Cities Mesas, Arroyo Grande Plain, Nipomo Valley, Arroyo Grande Valley, and Pismo Creek Valley. The Basin was adjudicated in 2008 and divided into three management areas. The project site is located within the Santa Maria Valley Management Area (SMVMA). According to the 2019 annual report for the SMVMA, the shallow and deep groundwater levels across the majority of the SMVMA remain slightly above historical low levels and do not meet the definition of a condition of severe water shortage. The project site currently uses on-site groundwater wells for agricultural irrigation.

##### **City of Santa Maria**

The City supplies local groundwater mixed with imported State water to its service area, which includes most areas within the City boundary, as well as planned expansion areas to the west, southeast, and northeast of the City. The project site is not included in the planned expansion area (City of Santa Maria 2016). Table 4.14-1 shows projected water supply and demand for the City of Santa Maria. The 2015 Urban Water Management Plan shows that the City has adequate water supplies to meet its projected demands.

**Table 4.14-1 City of Santa Maria Projected Water Supply and Demand**

	2015	2020	2025	2030	2035	2040
Water Supplies	35,686	49,923	49,798	49,671	49,545	49,418
Water Demand	12,334	13,195	14,399	16,993	17,893	18,714

Units in acre-feet per year (AFY)

Source: City of Santa Maria 2016

#### b. Wastewater

In general, development within the unincorporated County use on-site septic or alternative wastewater disposal systems and do not connect to a municipal wastewater facility.

### **c. Stormwater Drainage**

As discussed in Section 4.10, *Hydrology and Water Quality*, the project site gently slopes to the northwest and discharges stormwater runoff to the existing drainage ditch along the south edge of Betteravia Road. There are no natural drainage channels on the project site. Stormwater runoff from the project site discharges to the on-site irrigation ditch with no connection to the Santa Maria River or other receiving water body.

### **d. Electric Power**

The main electricity provider in the region is Pacific Gas and Electric Company (PG&E). In 2019, PG&E customers consumed a total of 78,071 gigawatt-hours (GWh) of electricity statewide (CEC 2019a). Energy consumption is discussed in detail in Section 4.6, *Energy*.

### **e. Natural Gas**

The project site is located within Southern California Gas Company's (SCG) natural gas service area, which provides service to most of southern California (SCG 2020). SCG's service area is equipped with approximately 5.9 million meters of gas transmission pipelines throughout the 24,000-square mile service area (SCG 2020). In 2019, SCG customers consumed a total of 5.4 billion therms of natural gas (CEC 2019b). Residential users accounted for approximately 44 percent of SCG's natural gas consumption. Industrial and commercial users accounted for another 31 percent and 19 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2019b). Natural gas consumption is discussed in detail in Section 4.6, *Energy*.

### **f. Telecommunications**

The project site is located in area code 805 and Local Access and Transport Area 740 (Local Calling Guide 2021). A Local Access and Transport Area is a geographical area within which a divested Regional Bell Operating Company is permitted to offer exchange telecommunications and exchange access services (CPUC 2020). The project vicinity is served by multiple telecommunication providers, including Xfinity, Viasat, and HughesNet (Highspeedinternet 2020).

### **g. Solid Waste**

The Santa Barbara County Resource Recovery and Waste Management Division provides regional solid waste collection service through Waste Management (Health Sanitation Service) to the project vicinity. Solid waste generated by the Project will be transported to the Santa Maria Landfill, located at 2065 East Main Street in Santa Maria, until the planned Los Flores Ranch Landfill is operational. The permitted capacity of the Santa Maria Landfill is approximately 14 million cubic yards (CY), with a total remaining capacity of approximately 2.2 million CY. Santa Maria Landfill has a maximum throughput of 858 tons per day, and is estimated to reach capacity in 2027 (CalRecycle 2020). Los Flores Ranch Landfill will be located in the Solomon Hills in unincorporated Santa Barbara, approximately 7 miles south of the City of Santa Maria. The Los Flores Ranch Landfill is anticipated to have a maximum throughput of 1,600 tons per day and at least 90-years of capacity (RWQCB 2014, City of Santa Maria 2018a).

## 4.14.2 Regulatory Setting

### **a. Federal Regulations**

#### **Clean Water Act**

The Federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary Federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency (USEPA) the authority to implement Federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

#### **Safe Drinking Water Act**

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water (42 USC Section 300(f) et seq.; 40 CFR Section 141 et seq.). The principle objective of the Federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the Federal SDWA are to:

- Ensure that water from the tap is potable
- Prevent contamination of groundwater aquifers that are the main source of drinking water for a community
- Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144)
- Regulate distribution systems

### **b. State Regulations**

#### **California Safe Drinking Water Act**

The California SDWA (Health & Safety Code Section 116270 et seq.; 22 CCR Section 64400 et seq.) regulates drinking water more rigorously than the Federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels (MCLs) be established for pollutants in drinking water; however, some California MCLs are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

#### **Sustainable Groundwater Management Act**

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources (DWR).



The project site overlies the Santa Maria Groundwater Basin, for which no groundwater sustainability agency has been established. This basin is designated as very low priority (DWR 2020b).

## **Title 24, California Code of Regulations**

California Code of Regulations, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods.

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Code). The 2016 CALGreen standards establish a construction waste diversion goal of 65 percent.

In 2016, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2017. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

The 2019 update to the Building Energy Efficiency Standards under Title 24 applies to buildings for which an application for a building permit is submitted on or after January 1, 2020. In nonresidential buildings, the standards mainly update indoor and outdoor lighting and use of light emitting diode (LED) technology as well as HVAC ventilation and filtration requirements (CEC 2018e).

## **California Integrated Waste Management Act**

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) required all cities and counties to develop a Source Reduction and Recycling Element (SRRE) for diverting 50 percent of their solid waste from landfills by the year 2000. To comply with the goals set by AB 939, the County of Santa Barbara requires a reduction in solid waste generation for all new development projects in the county. County waste characterization studies estimate that implementation of a SRRE program could reduce the total volume of waste generated by new development projects by approximately 50 percent (Santa Barbara County 2008). Through recycling and reduction programs and policies, Santa Barbara County has achieved a 69 percent solid waste diversion rate as of 2017 (Santa Barbara County 2019b).

## **Assembly Bill 341**

The purpose of Assembly Bill (AB) 341 of 2011 (Chapter 476, Statutes of 2011) is to reduce greenhouse gas (GHG) emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 set a statewide goal for 75 percent disposal reduction by the year 2020.

## **c. Local Regulations**

### **Santa Maria Basin Water Rights Adjudication**

Water rights to the Santa Maria Basin have been adjudicated by the five-phase trial Santa Maria Valley Water Conservation District vs. City of Santa Maria, et. al (Superior Court, County of Santa Clara, Case no. 770214). The Superior Court of California, County of Santa Clara, passed down the Stipulation of the Santa Maria Groundwater Basin Litigation in 2008 in order to ensure the Basin's long-term sustainability. Under the Santa Maria Groundwater Basin Adjudication Stipulation, all landowners have a overlying right to utilize their groundwater allocation, even if they have previously or are currently utilizing their water allocation.

### **Santa Barbara County Wastewater Regulations**

Through a memorandum of understanding with the CCRWQCB, on-site sewage disposal systems in Santa Barbara County are regulated by the County Public Health Department, Environment Health Services Division (EHS) and the CCRWQCB. The County Wastewater Ordinance sets forth specific requirements related to permitting and inspection of onsite systems; septic tank design and construction; drywell and disposal field requirements; servicing, inspection, reporting and upgrade requirements; and regulations for on-site systems. Standards pertaining to system sizing and construction are contained in the California (Uniform) Plumbing Code.

### **Santa Barbara County Comprehensive Plan**

The Conservation Element of the County's Comprehensive Plan, amended in August 2010, is intended to guide land use planning with goals and policies to ensure the conservation of natural resources, including water, forests, soils, waterways, wildlife, and minerals. The following goals and policies are pertinent to the proposed project:

- Water Resource Policy 1, which supports RWQCB discharge requirements to protect surface and groundwater supplies.
- Water Resource Policy 4, which requires an assessment of proposed septic tanks and potential impacts on water quality.

## **4.14.3 Impact Analysis**

### **a. Methodology and Significance Thresholds**

Appendix G of the CEQA guidelines considers a project to have a significant impact to utilities and service systems if the project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
3. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

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4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Potential impacts related to wastewater treatment providers (Checklist Question 3) are discussed in Section 4.15, *Effects Found Not to be Significant*.

To address the Appendix G Checklist Questions for utilities and service systems, this analysis uses the County's service-specific thresholds. This analysis relies on the County of Santa Barbara Environmental Thresholds and Guidelines Manual (September 2020) to determine thresholds of significance of impacts related to solid waste. Based on the Santa Barbara County Environmental Thresholds and Guidelines Manual, as well as standards from the USEPA and RWQCB, utilities and service systems impacts would be considered significant if the project:

- Results in more than 350 tons of construction and demolition debris, which is equivalent to the construction of 28,000 square feet of new commercial/industrial buildings;
- Generates 5 percent or more of the expected annual increase in waste generation, thereby using a significant portion of the remaining landfill capacity. Based on an assumed 4,000 tons per year increase in solid waste generation, the numerical value associated with the 5 percent increase is 196 tons per year.

As landfill space is already limited, any increase in solid waste of 1 percent or more of the estimated increase accounted for in the SRRE would also be considered an adverse contribution to regional cumulative solid waste impacts. One percent of the SRRE projected increase in solid waste equates to 40 tons per year. Projects or developments that generate less than 40 tons per year of solid waste would not be considered to have a cumulative adverse effect due to the small amount of waste generated by these projects and the existing waste reduction provisions in the SRRE.

Solid waste generation for both construction and operation of the proposed project was estimated using solid waste generation rates in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (September 2020). Per the County of Santa Barbara Environmental Thresholds and Guidelines Manual, the solid waste generation rate for construction of new commercial development is 25 pounds per square foot. For operation of a warehouse, the annual solid waste generation rate is the building square footage x 0.0016.

## b. Project Impacts and Mitigation Measures

<p><b>Threshold 1:</b> Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p>
<p><b>Threshold 2:</b> Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</p>

**Impact U-1 THE PROJECT WOULD BE SERVED BY WATER SUPPLIERS WITH SUFFICIENT CAPACITY, AND WOULD NOT REQUIRE SUBSTANTIAL NEW OR EXPANDED WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATION FACILITIES. THESE IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

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### Water

According to the *Ground Water Analysis* and addendums prepared for the project (Appendix I), water use for irrigation on the subject property is currently between 240 and 400 acre-feet per year (AFY) (an average of 320 AFY). The project would reduce the irrigation water demand by 120 to 200 AFY (an average of 160 AFY) through the removal of approximately 40 acres of crop production. The proposed freezer and processor facility would result in an anticipated maximum gross water demand of approximately 72 AFY and 200 AFY, respectively, with an additional potable water demand of 4.9 AFY. Of the 200 AFY that would be demanded by the freezer, an estimated 15 percent is anticipated to be lost via evaporation during vegetable processing and 25 percent from evaporation within the storage pond. Of the 72 AFY that would be demanded by the processor, an estimated 65 to 70 percent is anticipated to be lost from evaporation during refrigeration. Consequently, it is estimated that 60 percent of the process and cooling water (122 AFY) would return to the groundwater through infiltration. Overall, the project would result in an anticipated total net groundwater demand of 145 AFY (277 AFY of water demand minus and the 133 AFY returned to the groundwater basin).

Based on the existing water usage estimate of approximately 160 AFY on the 40-acre project site, which would be eliminated if the proposed project replaces the existing irrigated row crop production, the project would result in an approximately 15 AFY decrease in on-site groundwater demand from existing conditions. The project would be served by the existing on-site well for irrigation and a new on-site groundwater well for potable water and emergency water for fire suppression.

As described in Section 4.14.1(a), Water, the Santa Maria Groundwater Basin has adequate groundwater supplies. Additionally, the projected water use for the project is comparable to historic water use on the property for row crop farming (Appendix I). Therefore, the project would result in a net decrease of 15 AFY, and there are adequate water supplies in the local groundwater to serve the proposed project. There are sufficient water supplies available to serve the project, and the construction of new or expanded water facilities, beyond the proposed new on-site well, would not be required. Therefore, impacts to water supplies and water facilities would be less than significant.

## **Wastewater**

As described in Section 4.15, *Effects Found Not to be Significant*, and Section 2.5.10 of the Project Description, *Wastewater*, the project would not require a connection to off-site wastewater treatment facilities as wastewater would be treated and disposed of on site. Therefore, no impact to wastewater facilities or capacity would occur.

## **Stormwater Drainage**

Impacts regarding stormwater drainage facilities are discussed in detail in Section 4.10, *Hydrology and Water Quality*. Stormwater runoff would discharge to downstream irrigation ditches and would not drain to an off-site storm drain system. Stormwater runoff from the project site would be directed to the proposed retention/infiltration basin and reduced to Santa Barbara County Flood Control and Water Conservation District standards (SBCFCWCD). Compliance with applicable SBCFCWCD conditions and requirements would ensure impacts to stormwater facilities would be less than significant.

## **Electric Power**

The project would require approximately 35.5 GWh per year of electricity (Appendix C). PG&E electrical transmission lines are already present along Betteravia Road adjacent to the project site. As described in Section 4.6, *Energy*, PG&E would have sufficient supplies for the project and the project would not place a significant new demand on the electrical supply. Modification to existing electrical transmission and distribution systems off site to serve the project would not be required. Therefore, impacts regarding electric power demand would be less than significant.

## **Natural Gas**

The project would require approximately 1,604,260 thousand British thermal units (kBtu) (0.016 million therms [MMthm]) per year for general energy use and 11,544,000 kBtu (or 0.016 MMthm) per year for boilers (Appendix C). An existing gas line is located within the Betteravia Road right-of-way adjacent to the project site. As shown on Figure 2-2 in Section 2, Project Description, *Project Site Plan*, the project would construct a new gas line on the project site that connects to the existing gas line in the Betteravia Road right-of-way. As described in Section 4.6, *Energy*, SCG would have sufficient supplies for the project and the project would not place a significant new demand on the natural gas supply. Modifications to existing natural gas transmission lines off site to serve the project would not be required. Therefore, impacts regarding natural gas demand would be less than significant.

## **Telecommunication Facilities**

Implementation of the project would not require the provision of new or upgraded utility infrastructure to meet the needs of the project. However, the project would use existing telecommunication facilities during operation. The project would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, impacts to telecommunication facilities would be less than significant.

## **Mitigation Measures**

No mitigation measures are required because these impacts would be less than significant.

<p><b>Threshold 4:</b> Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</p>
<p><b>Threshold 5:</b> Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p>

**Impact U-2 THE PROJECT WOULD GENERATE SOLID WASTE DURING CONSTRUCTION AND OPERATION THAT WOULD INCREASE DEMAND ON THE SANTA MARIA LANDFILL. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Using the County of Santa Barbara Environmental Thresholds and Guidelines Manual solid waste generation rate of the building square footage x 0.0016, the 449,248-square foot processor and freezer facility would result in approximately 719 tons of new solid waste per year during operation. This would exceed the 196 tons per year project-level threshold per the Santa Barbara County Environmental Thresholds and Guidelines Manual for operational solid waste generation. Mitigation Measure U-1 requires implementation of a Source Reduction and Solid Waste Management Plan to reduce solid waste generation during the operational phase.

Construction activity would also generate solid waste, particularly wood, metal, and cardboard. According to the County of Santa Barbara Thresholds and Guidelines Manual, construction that results in more than 350 tons of construction or demolition debris (corresponding to an approximately 28,000-square foot new commercial/industrial building) would have a significant impact on solid waste services. Using the County of Santa Barbara Environmental Thresholds and Guidelines Manual solid waste generation rate of 25 pounds per square foot for construction of new commercial development, the proposed 449,248-square foot facility would result in 5,616 tons of solid waste during construction. The disposal of construction materials would exceed the 350 tons of construction debris threshold per the Santa Barbara County Environmental Thresholds and Guidelines Manual for new construction of commercial/industrial facilities, resulting in a significant impact on solid waste services. Mitigation Measure U-2 requires implementation of a Source Reduction and Solid Waste Management Plan to reduce solid waste generation during the construction phase.

### **Mitigation Measures**

*U-1 Source Reduction and Solid Waste Management Plan (SRWMP) during Operation*

The Applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) for project operation and submit to the County for approval prior to issuance of building permits. The SRWMP shall describe commitments to reduce the amount of waste generated during project operation. The SRWMP shall include, at a minimum:

1. Provision of space and/or bins for storage of recyclable materials within common areas of the project site.
2. Management strategies for organic waste, including potential locations for off-site composting.
3. Implementation of a green waste source reduction program for composting in open areas, and the use of mulching mowers in all common open space lawns.

**Plan Requirements and Timing.** The Applicant shall submit a Source Reduction and Solid Waste Management Plan to Planning & Development for project operation for review and approval prior to

issuance of building permits. The Applicant shall implement all aspects of the Plan during operation of the project in accordance with the above-described conditions.

**Monitoring.** Prior to occupancy, the Applicant shall demonstrate to Planning & Development compliance monitoring staff that all required operational solid waste reduction measures will be implemented.

*U-2 Source Reduction and Solid Waste Management Plan (SRWMP) during Construction*

The Applicant shall prepare a Source Reduction and Solid Waste Management Plan (SRWMP) for construction and submit to the County for approval prior to issuance of grading permits. The SRWMP shall describe commitments to reduce the amount of waste generated during construction of the project and estimate the reduction in solid waste generated during each phase of project construction. The SRWMP shall include, at a minimum:

1. Construction Source Reduction
  - a. A description of how fill will be used on the construction site, instead of landfilling.
  - b. A program to purchase materials that have recycled content for project construction.
2. Construction Solid Waste Reduction
  - a. Prior to construction, the contractor will arrange for construction recycling service with a waste collection provider. Roll-off bins for the collection of recoverable construction materials will be located onsite. The Applicant, or authorized agent thereof, shall arrange for pick-up of recycled materials with a waste collection provider or shall transport recycled materials to the appropriate service center. Wood, concrete, drywall, metal, cardboard, asphalt, soil, and land clearing debris may all be recycled.
  - b. The contractor will designate a person to monitor recycling efforts and collect receipts for roll-off bins and/or construction waste recycling. All subcontractors will be informed of the recycling plan, including which materials are to be source-separated and placed in proper bins.
  - c. Recycling and composting programs including separating excess construction materials on-site for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provided separate on-site bins as needed for recycling.

**Plan Requirements and Timing.** The Applicant shall submit a Source Reduction and Solid Waste Management Plan for construction to Planning & Development for review and approval prior issuance of a grading permit. The Applicant shall implement all aspects of the Plan during construction of the project in accordance with the above-described conditions.

**Monitoring.** The Applicant shall demonstrate to Planning & Development compliance monitoring staff that all required source reduction and solid waste reduction measures are implemented during project construction.

### **Significance After Mitigation**

According to County of Santa Barbara Environmental Thresholds and Guidelines Manual, implementation of solid waste management plans can reduce waste generation by 50 percent. County Planning & Development has adopted the current CALGreen Building Standards, which increase the construction waste diversion goal to 65 percent. Based on this estimated reduction, Mitigation Measure U-1 would

reduce solid waste generation during the operational phase of the project by approximately 50 percent to approximately 360 tons per year. Mitigation Measure U-2 would reduce solid waste generation during the construction phase of the project by approximately 65 percent to 1,965 tons of construction waste. However, waste generated by the project would still exceed the County's operational solid waste threshold of 196 tons per year and the construction solid waste threshold of 350 tons. Therefore, the project would continue to exceed the County's solid waste thresholds for operation and construction, even with implementation of feasible mitigation. As a result, operational and construction impacts related to solid waste would be significant and unavoidable.

### **c. Cumulative Impacts**

A project's environmental impacts are "cumulatively considerable" if the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (CEQA Guidelines Section 15065[a][3]). Adjacent development that is considered part of the cumulative analysis includes planned, pending, and reasonably foreseeable projects in northern Santa Barbara County, listed in Table 3-1.

#### **Water**

The geographic scope for cumulative water supply impacts is the Santa Maria Groundwater Basin. This geographic scope is appropriate because the project would draw groundwater from on-site wells, and the local water purveyor, the City of Santa Maria, also sources its water supply substantially through the basin. Cumulative development in the area will continue to increase demands on the City of Santa Maria's water supplies. Table 4.14-1 shows the projected water demands for the City through 2040. By 2040, the City anticipates a total demand of 18,714 AFY, an increase of 6,380 AFY from the 2015 demands (City of Santa Maria 2016). Table 4.14-1 also shows that water supplies exceed projected water demands by 30,704 AFY in 2040. Therefore, there are sufficient existing water supplies to accommodate cumulative development in addition to the project. Additionally, the project would result in a net 15 AFY decrease in groundwater demand from the Santa Maria Groundwater Basin, and the basin has adequate capacity to serve existing uses through the cumulative year (Appendix I). Therefore, adequate groundwater supplies are available to serve the project alongside cumulative development in the region, and the project would not result in a substantial contribution to a cumulative groundwater impact.

#### **Wastewater**

As described in Section 4.15, *Effects Found Not to be Significant*, and Section 2.5.10 of the Project Description, *Wastewater*, the project would not connect to municipal wastewater facilities and would treat and dispose of wastewater on site. Therefore, the project would have no cumulative contribution to wastewater impacts.

#### **Stormwater Drainage**

As described in Section 4.10, *Hydrology and Water Quality*, cumulative projects would be required to comply with SBCFCWCD drainage requirements to control and reduce on-site stormwater flows. These requirements would ensure that cumulative projects would not substantially affect existing stormwater drainage systems or result in inadequate facilities for the control of stormwater runoff. The project includes the provision of an on-site retention/infiltration basin, which would collect



stormwater runoff on site and ensure the project has a less than significant contribution to cumulative stormwater drainage impacts.

### **Electric Power Facilities**

The geographic scope for cumulative electricity impacts is the PG&E service area. This geographic scope is appropriate because, as the local provider, PG&E is responsible for transmitting electricity to all land uses within its service area, including the project site. As described in Section 4.6, *Energy*, project electricity consumption would account for less than one percent of the amount of electrical power PG&E provides. Therefore, PG&E would have sufficient supplies for the project and would not place a significant demand on the electrical supply.

Any necessary electrical system infrastructure improvements would be made in compliance with the rules and regulations of PG&E on file with and approved by the CPUC, which would ensure that project impacts would be reduced to less than significant. Therefore, the project would not have a cumulatively considerable contribution to a cumulative impact regarding electricity.

### **Natural Gas Facilities**

The geographic scope for cumulative natural gas impacts is the SCG service area. This geographic scope is appropriate because, as the local provider, SCG is responsible for transmitting natural gas to all land uses within its service area, including the project site. As described in Section 4.6, *Energy*, based on the provided amount of natural gas that SCG distributes, the project would account for less than one percent of SCG supplies. Therefore, SCG would have sufficient supplies for the project.

Any necessary natural gas system infrastructure improvements would be made in compliance with the rules and regulations of SCG on file with and approved by the CPUC, which would ensure that project impacts would be reduced to less than significant. Therefore, the project would not have a cumulatively considerable contribution to a cumulative impact regarding natural gas.

### **Telecommunication**

The geographic scope for cumulative telecommunications impacts is the County of Santa Barbara. This geographic scope is appropriate because local providers within the county are responsible for providing adequate telecommunication infrastructure to all land uses within the county, including the project site.

Cumulative development would increase demand for telecommunications infrastructure in the county. However, cumulative projects would each be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as the project. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

### **Solid Waste**

The geographic scope for cumulative solid waste impacts is the Santa Maria Landfill service area. This geographic scope is appropriate because solid waste in the county is transported to this landfill, including solid waste generated at the project site.

The proposed development, in conjunction with other planned and pending development in the Santa Maria area, would increase solid waste generation, thereby reducing the lifespan of the Santa Maria Landfill. Project operation would contribute incrementally to the cumulative impact to landfill

capacity. It should be noted that the County does not provide a cumulative construction solid waste threshold; therefore, solid waste generated by project construction is only considered as a project-level short-term impact, under Impact U-2. The project would generate 719 tons of additional operational waste per year. Waste generated during project operation would exceed the County's 40 tons per year cumulative solid waste threshold. Mitigation Measure U-1 requires implementation of a Source Reduction and Solid Waste Management Plan (SRWMP) to reduce solid waste generation during the operational phase.

According to County of Santa Barbara Environmental Thresholds and Guidelines Manual, implementation of solid waste management plans can reduce operational waste generation by 50 percent. Implementation of Mitigation Measure U-1 would reduce the project's solid waste generation to 360 tons per year during project operation, which would be above the County's 40 tons per year cumulative solid waste threshold. Therefore, the project's contribution to cumulative solid waste impacts would be significant and unavoidable.

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## 4.15 Effects Not Found to be Significant

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In accordance with the *CEQA Guidelines*, a Notice of Preparation (NOP) for this EIR was distributed for review by affected agencies and the public on October 22, 2020. The NOP and responses received during the NOP comment period are presented in Appendix A of this report. Based on comments received during the NOP comment period, the County of Santa Barbara determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects in the following resource areas:

- Forest Resources;
- Historic Resources;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation; and
- Wildfire.

No further environmental review of these issues is necessary for the reasons summarized in the following discussion.

In addition, the EIR evaluation identified Checklist Questions from Appendix G of the State CEQA Guidelines where the project would not result in significant environmental effects in the following issue areas:

- Air Quality;
- Biological Resources;
- Geology and Soils;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality
- Land Use and Planning;
- Noise; and
- Utilities and Service Systems.

The substantiation for determining that these issues would result in no impact or a less-than-significant impact is described in further detail in the following discussion.

### 4.15.1 Air Quality

#### **Potential Environmental Effects**

- Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

#### **Reasons Why Effects Were Not Found Significant**

According to the SBCAPCD, common types of facilities that are known producers of odors include fast food restaurants, bakeries, and coffee roasting facilities. The proposed project would not include any

of these types of land uses. The proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time near the project site. However, they would be localized and are not expected to adversely affect people off-site by resulting in confirmed odor complaints. In addition, food and other agricultural waste would be stored in closed receptacles, which would minimize odors. In addition, there may be odors associated with the on-site wastewater basin and septic leach field. The nearest sensitive receptors (residences) are located approximately 2,000 feet from the project site. Due to the distance between the project site and sensitive receptors, the nearby residential uses would not be affected by any odors generated on the project site. Therefore, impacts related to significant odors that would be expected to result in complaints from surrounding uses or otherwise adversely affect a substantial number of people would be less than significant.

## 4.15.2 Biological Resources

### **Potential Environmental Effects**

- Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

### **Reasons Why Effects Were Not Found Significant**

The project site and surrounding area consists of existing agricultural development. The project site does not include any riparian habitat or other sensitive natural communities. Therefore, the project would not result in impacts to riparian habitat or other sensitive natural communities.

The main opportunity for potential wildlife migratory movement would be within the constructed irrigation drainage, which would retain its conveyance capacity throughout project activities, and would continue to allow for wildlife movement. Therefore, the project would not result in impacts to migratory wildlife corridors.

The project does not involve the removal of trees and would not conflict with applicable portions of the County's Tree Preservation Ordinance or tree removal requirements. The irrigation drainage contains two of the three wetland parameters that define a County wetland. However, the drainage is not naturally occurring; it was constructed to solely convey agriculture irrigation discharge and is not regulated by the County. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources.

The project area is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans.

### 4.15.3 Forest Resources

#### Potential Environmental Effects

- Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?
- Would the project result in the loss of forest land or conversion of forest land to non-forest use?

#### Reasons Why Effects Were Not Found Significant

The project site is zoned AG-II (Agricultural II) with a corresponding zoning map symbol of AG-II-40. The subject property is currently used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). The proposed uses are consistent with the AG-II zoning for the site. The project site does not contain any forest land, timberland, or timberland zoned Timberland Production. Therefore, the project would not result in any impacts to forest or timberland resources.

### 4.15.4 Geology and Soils

#### Potential Environmental Effects

- Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
  - Seismic-related ground failure, including liquefaction?
  - Landslides?
- Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

#### Reasons Why Effects Were Not Found Significant

##### *Fault Rupture*

The project site is located in a seismically active region of California and is subject to potential ground shaking associated with seismic activities. However, the project site is not located within an Alquist-Priolo Earthquake Fault Zone, as delineated by the State Geologist, and there are no known active faults crossing or trending toward the project site. Therefore, implementation of the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death resulting from surface rupturing in the event of an earthquake. No impacts related to fault rupture would occur and no mitigation is required.

### *Liquefaction and Unstable Soils*

The project site is mapped within an area of moderate potential for liquefaction. Unstable soils in the project site also introduce potential risks to proposed employees, structures, infrastructure, and/or to human health and safety. Unstable soils may include any materials not capable of supporting a selected land use.

As required by Public Resources Code (PRC) Section 2690-2699.6, *Seismic Hazards Mapping Act*, and CBC requirements, site-specific geotechnical evaluations would be conducted for the project to identify design parameters and describe appropriate design measures to address soil constraints, including from liquefaction and unstable soils. These geotechnical studies typically include recommendations for foundation design, as well as soil improvement techniques, both of which address any unstable soils and liquefaction hazards.

Conformance with PRC and CBC requirements would minimize risks to life and property associated with potential liquefaction and unstable soil within the project site. Therefore, potential impacts associated with unstable soils and liquefaction are less than significant and no mitigation is required.

### *Landslides and Seismically Induced Slope Failures*

Proper engineering, including compliance with the CBC and Comprehensive Plan policies, would minimize the risk to life and property associated with potential landslides in the area. The project site is relatively flat and is not located adjacent to steep slopes subject to landslide, and the site is not mapped within an area susceptible to landslides. Therefore, no impacts related to landslides would occur.

### *Expansive Soils*

The project site is underlain by Betteravia loamy sand 0 to 2 percent slopes and Pleasanton sandy loam 0 to 2 percent slopes (NRCS 2020). The Betteravia series consists of deep, moderately well drained soils that formed from Eolian sands, and the Pleasanton series consists of well drained soils formed from quartzite, sandstone, and shale alluvium (NRCS 2020). Expansive soils are typically very fine-grained with a high to very high percentage of clay. According to the USDA NRCS, site soils have a maximum plasticity index rating of 10.0, which indicates that site soils have a low expansive potential (NRCS 2020). Areas characterized by low expansive potential do not pose a geologic hazard.

With adherence to state and local laws, regulations, and policies such as the CBC and the County's Comprehensive Plan, impacts associated with expansive soils that could occur with implementation of the project would be minimized or avoided. Impacts associated with expansive soils would therefore be less than significant.

## 4.15.5 Hazards and Hazardous Materials

### **Potential Environmental Effects**

- Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

- Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

### **Reasons Why Effects Were Not Found Significant**

The nearest school to the site is Battle Elementary School, located approximately 1.6 miles to the northwest. The project site is not located within 0.25 mile of an existing or proposed school. Therefore, there would be no impact associated with hazardous emissions or materials on schools.

The project site is not located within an airport planning area or Airport Area of Influence (AIA). Therefore, there would be no impact associated with aviation-related hazards.

Construction of new agricultural structures on the project site would not impair implementation of, or physically interfere with the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, which describes County emergency response and evacuation procedures. The project would be required to comply with applicable Santa Barbara County Fire Department specifications and Chapter 5 of the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures.

As identified in the Seismic Safety and Safety Element of the Comprehensive Plan, the subject property is not located in a high, or very high fire hazard severity zone within a local or State responsibility area. The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan identifies the project site vicinity as under low to moderate fire threat. The project site and surrounding parcels do not contain wildlands, forests, or dense vegetation that would expose the project to wildfire risk. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

## 4.15.6 Historic Resources

### **Potential Environmental Effects**

- Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

### **Reasons Why Effects Were Not Found Significant**

The project site is currently used for row crop production and does not feature any structural development. No structures or formal landscape features identified as historic resources currently exist on the project site. Therefore, the project would not result in any impacts to historic resources.

## 4.15.7 Hydrology and Water Quality

### **Potential Environmental Effects**

- Would the project impede or redirect flood flows?
- In a flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundations?
- Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?



### **Reasons Why Effects Were Not Found Significant**

The proposed project is not located within a 100-year floodplain, areas subject to flood from dam failure, or seiche or tsunami inundation zones. Therefore, the proposed project would not impede or redirect flood flows or result in risk of release of pollutants due to project inundation.

Stormwater runoff would discharge to irrigation ditches and would not discharge to a receiving water (such as the Santa Maria River) with beneficial uses or water quality objectives, as designated in the Central Coast Regional Water Quality Control Board's (RWQCB's) Water Quality Control Plan (Basin Plan). The groundwater basin is designated as very-low threat by the Department of Water Resources (DWR) pursuant to the Sustainable Groundwater Management Act (SGMA), and development of a Groundwater Sustainability Plan is not required. For these reasons, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

#### 4.15.8 Land Use and Planning

##### **Potential Environmental Effects**

- Would the project physically divide an established community?

##### **Reasons Why Effects Were Not Found Significant**

The project site is used for agricultural purposes with a mix of row crops, livestock grazing, and an existing vegetable cooling plant (Mid Coast Cooling, Inc.). The existing vegetable cooling plant is located on the southwest portion on the property and would not be removed or modified as part of the proposed project. Therefore, no residents would be displaced as a result of development of the site. The site is zoned AG-II (Agricultural II) with a corresponding zoning map symbol of AG-II-40 and would not result in land use conflicts with the surrounding agricultural land uses. No project components would divide an established community. Therefore, this impact would be less than significant.

#### 4.15.9 Mineral Resources

##### **Potential Environmental Effects**

- Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

##### **Reasons Why Effects Were Not Found Significant**

Numerous Unocal wells are located on APNs 128-097-0001 and 128-097-002 and have gone through a series of abandonments since the 1960s. The project includes re-abandonment plans for three former petroleum wells (Vincent 9, 21, and 22) and a portion of a retired pipeline within the project footprint. The project would not require abandonment of any active petroleum well. According to the County's Environmental Resource Management Map for the Santa Maria-Orcutt area, there are no locally identified mineral resources on the project site (County of Santa Barbara 2009d). Therefore, the project would not result in the loss of availability of a valuable known mineral resource or locally important mineral resource recovery site.

## 4.15.10 Noise

### **Potential Environmental Effects**

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

### **Reasons Why Effects Were Not Found Significant**

The Santa Maria Airport is located 2.9 miles to the southwest of the project site. The medical helipad associated with Marian Regional Medical Center is located approximately 1.5 miles north of the project site. The project site is not within the noise contours for the airports (Santa Barbara County Association of Governments [SBCAG] Airport Land Use Commission [ALUC] 2021). Therefore, no substantial noise exposure would occur to construction workers or users of the project site from aircraft noise, and no impacts would occur.

## 4.15.11 Population/Housing

### **Potential Environmental Effects**

- Would the project induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

### **Reasons Why Effects Were Not Found Significant**

The proposed project would not directly generate population growth because it does not include residential uses. As discussed in Section 5.1.1, Population Growth, the project may indirectly increase the population if new employees relocate to Santa Maria or the surrounding area. However, these jobs would likely be filled by persons already residing in the City of Santa Maria. Therefore, although the proposed project would provide employment opportunities, it would not result direct population growth or result in substantial indirect growth. This impact would be less than significant.

In addition, the project would not displace any housing or people, as the project site is currently used for agriculture and is not developed with housing. Therefore, there is no need for the construction of replacement housing elsewhere. Overall, there would be no impacts related to displacement of housing or people.

## 4.15.12 Public Services

### **Potential Environmental Effects**

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?

### **Reasons Why Effects Were Not Found Significant**

Police protection in the unincorporated portion of Santa Barbara County is provided by Santa Barbara County Sheriff's Office (SBSO), while the California Highway Patrol (CHP) provides secondary police protection. SBSO has eight stations throughout the County. Fire protection in the unincorporated portion of Santa Barbara County is provided by the Santa Barbara County Fire Department (SBCFD). SBCFD has 15 stations throughout the County. Both the fire paramedics and the American Medical Response (AMR) ambulance service are under the authority of Santa Barbara County Emergency Medical Service Agency (SBCEMSA) and dispatched during emergency situations.

The proposed project would not directly generate population growth that would result in a need for additional public services or facilities because the project does not include any new residential uses. Employment opportunities associated with the project would likely be filled by persons already residing in and around the City of Santa Maria. However, the project may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and resulting demand for public services or facilities if new employees relocated to the surrounding area.

No new public services or facilities would be developed as part of the proposed development, and developmental impact mitigation fees would be assessed on any new residential development required to accommodate a potential increase in population in northern Santa Barbara County or the City of Santa Maria. Development impact mitigation fees assessed on new residential development would be used to develop additional public facilities and services serving Santa Barbara County or City of Santa Maria residents. Indirect physical impacts associated with implementation of planned public service and/or facility improvements would be addressed through separate CEQA review on a case-by-case basis. Therefore, the project would not result in potential impacts to existing public services and facilities or potential impacts associated with the need for new or expanded public services and facilities.

#### 4.15.13 Recreation

##### **Potential Environmental Effects**

- Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Does the project include recreational facilities or require the construction of expansion of recreational facilities which might have an adverse physical effect on the environment?

##### **Reasons Why Effects Were Not Found Significant**

The proposed project would not directly generate population growth that would result in a need for additional parkland because the project does not include any new residential uses. Employment opportunities associated with the project would likely be filled by persons already residing in and around the City of Santa Maria. However, the project may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and resulting demand for parkland if new employees relocated to the surrounding area.

No new public parklands would be developed as part of the proposed development, and developmental impact mitigation fees would be assessed on any new residential development required to accommodate a potential increase in population in northern Santa Barbara County or the City of Santa Maria. Development impact mitigation fees assessed on new residential development

would be used to develop additional public parks serving Santa Barbara County or City of Santa Maria residents. Indirect physical impacts associated with implementation of planned parks would be addressed through separate CEQA review on a case-by-case basis. Therefore, the project would not result in potential impacts to existing recreational facilities or potential impacts associated with the need for new or expanded recreational facilities.

#### 4.15.14 Utilities and Service Systems

##### **Potential Environmental Effects**

- Would the project result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

##### **Reasons Why Effects Were Not Found Significant**

As described in Section 2.5.10, *Wastewater*, the project would discharge and treat wastewater generated from the processor in a proposed on-site wastewater basin in the eastern portion of the project site. Domestic wastewater (from on-site uses such as sinks and toilets) would be discharged to the on-site septic leach fields located on the southeast corner of the project site. No wastewater would be discharged to a wastewater treatment provider; therefore, potential impacts to a provider's treatment capacity would not occur as a result of the project.

#### 4.15.15 Wildfire

##### **Potential Environmental Effects**

- If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:
  - Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
  - Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
  - Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

##### **Reasons Why Effects Were Not Found Significant**

As identified in the Seismic Safety and Safety Element of the Comprehensive Plan, the subject property is not located in a high, or very high fire hazard severity zone within a local or State responsibility area. The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan identifies the project site vicinity as under low to moderate fire threat. The project site and surrounding parcels do not contain wildlands, forests, or dense vegetation that would expose the project to wildfire risk. Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

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## 5 Other CEQA Required Discussions

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This section discusses other issues for which the California Environmental Quality Act (CEQA) requires analysis in addition to the specific issue areas discussed in Section 4, *Environmental Impact Analysis*, of this EIR. These additional issues include the potential to induce population growth and/or economic expansion; establishment of a precedent setting action; development or encroachment in an isolated or adjacent area of open space; removal of obstacles to growth; and significant and irreversible impacts on the environment.

### 5.1 Growth Inducement

Section 15126.2(d) of the *CEQA Guidelines* requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth.

Generally speaking, a project may be considered growth inducing if it results in one of the five conditions identified below:

1. Induces population growth.
2. Induces economic expansion.
3. Establishes a precedent setting action (e.g. an innovation, a radical change in zoning or general plan designation).
4. Results in development or encroachment in an isolated or adjacent area of open space (i.e. being distinct from “infill” development).
5. Removes an impediment to growth (e.g. the establishment of an essential public service or the provision of new access to an area).

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (*State CEQA Guidelines*, Section 15126.2[e]). This issue is presented to provide additional information on ways in which the project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed project as described in earlier sections of this EIR

#### 5.1.1 Population Growth

The proposed project involves development of a 449,248 square-foot gross floor area agricultural processor and freezer facility on a 40-acre project site located in the northeastern portion of the subject property. The proposed project would not directly generate population growth because it does not include residential uses. However, the proposed project may indirectly increase the population if new employees relocated to Santa Maria or the surrounding area. During the non-harvest season (August to May), the project would require approximately 153 employees. During the harvest season (May to August) the project would require approximately 623 employees. These jobs would likely be filled by persons already residing in the City of Santa Maria, which is located one mile to the east of the project site, or the surrounding area. However, in a conservative scenario wherein all projected employees and their families were to relocate to the City of Santa Maria, there would be a population growth of 2,355 persons based on the average household of 3.78 persons for Santa Maria (United States Census Bureau 2019). The population of the City of Santa Maria in January 2020

was 107,407 and the population is forecast to increase to 139,000 by the year 2040 (City of Santa Maria 2020b; County of Santa Barbara 2019c). Therefore, a population increase of 2,355 could be accommodated within the City's growth projections. However, as noted above, this is a conservative scenario as a large percentage of the jobs could reasonably be assumed to be filled by people already residing in the region. Therefore, although the proposed project would provide employment opportunities, it would not result direct population growth or result in substantial indirect growth.

### 5.1.2 Economic Growth

As discussed in Section 2.6 of the Project Description, Project Objectives, one of the primary objectives for the project is to provide increased occupational opportunities in the agricultural community. The project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. However, the project would also add long-term employment opportunities associated with operation of the agricultural processor and freezer facility. During the non-harvest season (August to May), the project would require approximately 153 employees. During the harvest season (May to August) the project would require approximately 623 employees.

Employment in the City of Santa Maria is forecasted to increase by 8,370 jobs between 2020 and 2040 (County of Santa Barbara 2019c). The 623 jobs anticipated by the proposed project during harvest season would be approximately 7.4 percent of the projected job growth between 2020 and 2040 and, therefore would be within employment forecasts. The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around Santa Maria would be addressed as part of the CEQA environmental review for such development projects.

### 5.1.3 Precedent Setting Action

The proposed project would result in the development of an agricultural processing and freezer facility on the project site, which is zoned and currently used for agricultural purposes. Specifically, the property is zoned AG-II (Agricultural II), which applies to areas appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area, as shown on the County's Comprehensive Plan maps, with the intention of preserving these lands for long-term agricultural use. The proposed project involves a Conditional Use Permit and Development Plan to allow development of an agricultural processor and freezer facility on the project site. The project would not require a change in zoning or general plan designation.

As discussed in Section 2.6 of the Project Description, Project Objectives, the primary objectives of the project are to preserve the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element; assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production; provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and provide increased occupational opportunities in the agricultural community. The project vicinity includes adjacent and nearby agricultural processing facilities similar in character to the proposed project. As such, the project would support the continued agricultural uses in the surrounding area and would not set a precedent of developing agricultural land to non-agricultural uses. For these reasons, the proposed project would not present a precedent that would have growth-inducing impacts in the area.

### 5.1.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. The project site is zoned and currently used for agricultural purposes. The proposed project involves a Conditional Use Permit and Development Plan to allow development of an agricultural processor and freezer facility on the project site. The project would be developed on agricultural land and not on open space or vacant land. However, the project would be developed in a rural agricultural area outside of urban boundaries. The project site is located in an area where open space agricultural and agricultural industrial uses are already interspersed. Therefore, the project would not be inconsistent with the existing land use pattern.

As discussed in Section 2.6 of the Project Description, Project Objectives, the primary objectives of the project are to preserve the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element; assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production; provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and provide increased occupational opportunities in the agricultural community. As such, the project would support the continued agricultural uses in the surrounding area and would not encourage the development of the surrounding agricultural land to other uses.

### 5.1.5 Removal of Obstacles to Growth

The project site is surrounded in all directions by active agricultural operations. The project would develop an agricultural processor and freezer facility on the project site to support on-going agricultural uses in the area. The project proposes frontage improvements on Betteravia Road, including the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site. The proposed roadway improvements are intended to provide access to the project site and would not increase the capacity of Betteravia Road. The project would not require the construction of new roads, and does not include any other new, major transportation or circulation routes that would result in a removal of an obstacle in the circulation/transportation system that would prompt growth in the area.

Minor improvements to electrical and natural gas connection infrastructure would be needed to serve the proposed use on the project site, but such improvements would be intended to specifically serve the proposed project. The project would not require a connection to off-site wastewater treatment facilities as wastewater would be treated and disposed of on site. The project would also not require a connection to off-site water distribution lines as potable and emergency water would be provided by a new on-site groundwater well. Pacific Gas and Electric (PG&E) electrical transmission lines and Southern California Edison (SCE) natural gas lines are currently located along Betteravia Road adjacent to the project site. The project would construct on-site connections to these existing utilities in the Betteravia Road right-of-way. However, off-site modification to existing electrical and natural gas transmission and distribution systems would not be required. For these reasons, implementation of the proposed project would not extend utility infrastructure through undeveloped areas in a manner that would not remove any obstacle to development. Overall, the project would not induce new development in the surrounding area, or otherwise remove any existing impediment to growth.



## 5.2 Significant Unavoidable Effects

*CEQA Guidelines* Section 15126(b) requires that an EIR identify those significant impacts that cannot be reduced to a less than significant level with the application of mitigation measures. The implications and reasons why the project is being proposed, notwithstanding, must be described.

As discussed in Sections 4.3, Air Quality, 4.8, Greenhouse Gas Emissions, and 4.14, *Utilities and Service Systems*, implementation of the proposed project would result in significant, unavoidable impacts associated with the following issues:

- Total and mobile source air quality emissions (nitrogen oxides [NO<sub>x</sub>]) during operation in exceedance of County thresholds
- Mobile and stationary source greenhouse gas (GHG) emissions in exceedance of sector-specific reduction targets and thresholds
- Project-level solid waste generation in exceedance of County solid waste thresholds during construction and operation; and
- Cumulative contribution to solid waste generation.

## 5.3 Significant Irreversible Environmental Effects

*CEQA Guidelines* Section 15126.2(c) requires a discussion of any significant irreversible environmental changes which would be caused by the project should it be implemented. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely.
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses.
- Irreversible damage which may result from environmental accidents associated with the project.

Development of the project would result in the permanent conversion of Prime Farmland and Unique Farmland currently under production to an agricultural processor and freezer facility. Construction of the project would also require building materials and energy, some of which are non-renewable resources. These resources would include certain types of lumber and other forest products (e.g., hardwood lumber), aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), and petrochemical construction materials (e.g., plastics). Fossil fuels (e.g., gasoline and oil) would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would occur on a temporary basis during project construction. Consumption of these resources would occur with any development in the region and are not unique to the project.

The addition of new operational uses on the project site would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of California Green Building Standards Code (CALGreen) regulations and policies included in the County Energy and Climate Action Plan (ECAP), are expected to offset the demand to some degree. It is not anticipated that the project would

substantially affect local or regional energy supplies. Section 4.6, *Energy*, includes a full analysis of potential impacts related to energy resources by construction and operation of the proposed project.

Development of the project would require an irreversible commitment of groundwater supply and solid waste disposal services. As discussed in Section 4.14, *Utilities and Service Systems*, the projected water use for the project is comparable to historic water use on the property for row crop farming. Additionally, the Santa Maria Groundwater Basin has adequate supply to serve the project. However, the proposed project would contribute a significant amount of solid waste to local landfills and would, therefore, result in a significant and irreversible environmental impact.

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## 6 Alternatives

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### 6.1 Introduction

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an Environmental Impact Report (EIR). The *CEQA Guidelines* state that an “EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.”

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed agricultural processor and freezer facility (proposed project) that would attain most of the following project objectives:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

In addition to meeting the project objectives, alternatives were considered that would avoid or substantially lessen the significant project impacts, including the following significant unavoidable adverse impacts identified for the project:

- Solid waste generation in exceedance of County solid waste thresholds for construction and operation (Impact U-2)
- Project contribution to cumulative solid waste impacts
- Total and mobile source air quality emissions (nitrogen oxides [NO<sub>x</sub>]) during operation in exceedance of County thresholds (Impact AQ-3)
- Mobile and stationary source greenhouse gas (GHG) emissions in exceedance of sector-specific reduction targets and thresholds

### 6.2 Project Alternatives

This discussion focuses on alternatives to the project, including alternatives which were considered but ultimately rejected from further evaluation. These alternatives have been selected for their ability to substantially reduce or eliminate one or more of the adverse impacts associated with the project, while still meeting basic project objectives. This EIR also evaluates a No Project Alternative, consistent with the *CEQA Guidelines* (Section 15126.6[e]). The no project analysis discusses the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services.

## 6.2.1 Alternatives Considered but Rejected from Further Evaluation

Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]).

*CEQA Guidelines* Section 15126.6(a) also states that “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other alternatives may be considered but are not required to satisfy the requirements of CEQA.

For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with County policies;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the County due to one or more of these factors.

### **Alternative Location**

The first step in considering an off-site alternative is whether any of the significant impacts of the project would be avoided or substantially lessened by the relocation. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]).

No alternative properties to undertake the proposed project are analyzed in this EIR. The project involves development of an agricultural processor and freezer facility on the subject property. Although there are other agricultural properties in the County that could support a development similar to the proposed project, the project applicant does not own or control any other property within the County or in the vicinity of the project site that would be suitable for development of the project. Moreover, the applicant cannot reasonably acquire or control an alternative property in a timely fashion that would allow for the implementation of a project with similar uses and square

footage. Additionally, relocating the proposed project to another property would not substantially lessen its significant unavoidable impacts associated with solid waste generation, air quality, or GHG emissions, which would be expected to occur regardless of location within the County. In addition, the proposed facility location is not within 2,000 feet of sensitive receivers; therefore, development of the proposed project on an alternative property could potentially result in some environmental impacts that would be greater than the impacts of the proposed project evaluated in this EIR, depending on the proximity of the alternate property to sensitive uses. As such, development of the proposed project on an alternative property would likely result in similar or greater environmental impacts as compared to development of the proposed project on the project site. As a result of these considerations, alternative project locations were considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

### **50 Percent Reduced Alternative**

A 50 Percent Reduced Alternative was considered to reduce the significant and unavoidable air quality, GHG, and solid waste impacts. The 50 Percent Reduced Alternative would include the same components as the proposed project and would be constructed on the same project site, but the square footage of the agricultural processor and freezer facility would be reduced by 50 percent. Specifically, a 50 Percent Reduced Alternative would include a Conditional Use Permit and Development Plan to allow development of a 224,624 square-foot agricultural processor and freezer facility on the 40-acre project site located in the northeastern portion of the subject property.

A 224,624-square foot processor and freezer facility would result in approximately 360 tons of new solid waste per year during operation. This would exceed the 196 tons per year project-level operational solid waste generation threshold and the 40 tons per year cumulative solid waste threshold. However, taking into consideration a 50 percent reduction that could be achieved through implementation of a Source Reduction and Solid Waste Management Plan (SRWMP) during operation, 180 tons of solid waste would be generated during operation. This would not exceed the 196 tons per year project-level operational solid waste generation threshold. However, this would exceed the 40 tons per year cumulative solid waste threshold. Cumulative solid waste impacts would remain significant and unavoidable.

A 224,624-square foot facility would result in 2,808 tons of solid waste during construction, which would exceed the 350 tons of construction debris threshold. Taking into consideration the 50 percent reduction that could be achieved through implementation of a SRWMP during construction, 1,404 tons of solid waste would be generated during construction, which would still exceed the 350 tons of construction debris threshold. Therefore, construction-related solid waste impacts would remain significant and unavoidable.

The 50 Percent Reduced Alternative would have 50 percent less production capacity than the proposed project and would have proportionally reduced vehicle trips, natural gas use, and stationary equipment use; therefore, the 50 Percent Reduced Alternative would result in a 50 percent reduction in total criteria pollutant emissions compared to the proposed project. The total NO<sub>x</sub> emissions during operation would be approximately 191 pounds per day and the mobile source NO<sub>x</sub> emissions during operation would be approximately 179 pounds per day. This would exceed the Santa Barbara County thresholds of 55 pounds per day for all sources and 25 pounds per day for mobile source emissions and operational air quality impacts would remain significant and unavoidable.

The 50 Percent Reduced Alternative would also have proportionally reduced vehicle trips, electricity use, natural gas use, waste generation, water consumption, and stationary equipment use. Therefore, the 50 Percent Reduced Alternative would result in 50 percent fewer total GHG emissions than the

**Arctic Cold Agricultural Processor and Freezer Project**

proposed project. Because the County uses a service population threshold for GHG emissions, the reduced emissions would also be assessed against a proportionally reduced service population (approximately half the number of employees compared to the proposed project). As a result, per-service-population GHG emissions from this alternative would remain similar to the proposed project and would exceed the County's GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Quantifying potential GHG reductions from feasible mitigation measures would be speculative due to uncertainty regarding the implementation of such measures. As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable, as well as the magnitude of the exceedance of the County's adopted GHG emissions threshold, and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), the impact from GHG emissions would remain significant and unavoidable.

As demonstrated above, a 50 Percent Reduced Alternative would proportionally reduce the solid waste, air quality, impacts, and project-level operational solid waste generation impacts compared to the proposed project. However, the significant unavoidable construction and cumulative solid waste impacts, operational air quality impacts, and operational mobile-source and stationary source GHG impacts would remain significant and unavoidable. The 50 Percent Reduced Alternative would not avoid or substantially lessen most of the significant impacts and therefore does not meet the intent of the CEQA alternatives.

This alternative would meet the following project objectives to a lesser extent than the proposed project:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

Due to the reduced project size, this alternative would not maximize the processing and freezing capacity and would therefore not meet the project objective of assisting area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes capacity of existing acreage under production.

Because this alternative would not avoid or reduce significant impacts of the project, this alternative was rejected from further consideration, consistent with *CEQA Guidelines* Section 15126.6(c).

**75 Percent Reduced Alternative**

A 75 Percent Reduced Alternative was also considered to reduce the significant, unavoidable air quality, GHG, and solid waste impacts. The 75 Percent Reduced Alternative would include the same components as the proposed project and would be constructed on the same project site, but the square footage of the agricultural processor and freezer facility would be reduced by 75 percent. Specifically, a 75 Percent Reduced Alternative would include a Conditional Use Permit and Development Plan to allow development of a 112,312 square-foot agricultural processor and freezer facility on the 40-acre project site located in the northeastern portion of the subject property.

A 112,312-square foot processor and freezer facility would result in approximately 180 tons of new solid waste per year during operation. This would not exceed the 196 tons per year project-level threshold for operational solid waste generation and operational solid impacts would be less than significant. However, this would exceed 40 tons per year cumulative solid waste threshold. Taking

into consideration a 50 percent reduction that could be achieved through implementation of a SRWMP during operation, 98 tons of solid waste would be generated during operation. This would still exceed the 40 tons per year cumulative solid waste threshold and cumulative solid waste impacts would remain significant and unavoidable.

A 112,312-square foot facility would result in 1,404 tons of solid waste during construction, which would exceed the 350 tons of construction debris threshold. Taking into consideration the 50 percent reduction that could be achieved through implementation of a SRWMP during construction, 702 tons of solid waste would be generated during construction, which would still exceed the 350 tons of construction debris threshold. Therefore, construction-related solid waste impacts would remain significant and unavoidable.

The 75 Percent Reduced Alternative would have 75 percent less production capacity than the proposed project and would have proportionally reduced vehicle trips, natural gas use, and stationary equipment use; therefore, the 75 Percent Reduced Alternative would result in a 75 percent reduction in total criteria pollutant emissions compared to the proposed project. The total NO<sub>x</sub> emissions during operation would be approximately 95 pounds per day and the mobile source NO<sub>x</sub> emissions during operation would be approximately 89 pounds per day. This would exceed the Santa Barbara County thresholds of 55 pounds per day for all sources and 25 pounds per day for mobile source emissions and operational air quality impacts would remain significant and unavoidable.

The 75 Percent Reduced Alternative would also have proportionally reduced vehicle trips, electricity use, natural gas use, waste generation, water consumption, and stationary equipment use. Therefore, the 75 Percent Reduced Alternative would result in 75 percent fewer total GHG emissions than the proposed project. Because the County uses a service population threshold for GHG emissions, the reduced emissions would also be assessed against a proportionally reduced service population (approximately one-quarter the number of employees compared to the proposed project). As a result, per-service-population GHG emissions from this alternative would remain similar to the proposed project and would exceed the County's GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Quantifying potential GHG reductions from feasible mitigation measures would be speculative due to uncertainty regarding the implementation of such measures. As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable, as well as the magnitude of the exceedance of the County's adopted GHG emissions threshold, and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), the impact from GHG emissions would remain significant and unavoidable.

As demonstrated above, a 75 Percent Reduced Alternative would proportionally reduce the significant, unavoidable operational solid waste impacts to less than significant. However, the significant unavoidable construction and cumulative solid waste impacts, operational air quality impacts, and operational mobile-source and stationary-source GHG impacts would remain. The 75 Percent Reduced Alternative would not avoid or substantially lessen most of the significant impacts and therefore does not meet the intent of the CEQA alternatives.

Additionally, this alternative would meet the following project objectives to a lesser extent than the proposed project:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.



**Arctic Cold Agricultural Processor and Freezer Project**

Due to the substantially reduced project size, this alternative would not maximize the processing and freezing capacity and would therefore not meet the project objective of assisting area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production.

Because this alternative would not avoid or reduce significant impacts of the project, this alternative was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

## 6.2.2 Description of Alternatives Evaluated

This analysis considers the following three alternatives to the proposed project:

- Alternative 1: No Project Alternative
- Alternative 2: 25 Percent Reduced Project Alternative
- Alternative 3: Alternative Location on Subject Property

Each of these alternatives is described below. The potential environmental effects of each of these alternatives in comparison to the proposed project is described in Section 6.3, Impact Analysis.

### **Alternative 1: No Project Alternative**

The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. This alternative assumes the project is not approved and none of the proposed components, including approval of the Development Plan, Conditional Use Permit, Voluntary Merger, Well Re-Abandonment Plans, and Well Construction Permit, are implemented. This alternative assumes the project site is not developed with the agricultural processor and freezer facility. Under this alternative, the project site would continue to be used for production of row crops, including strawberries and broccoli.

### **Alternative 2: 25 Percent Reduced Alternative**

Alternative 2 would include the same components as the proposed project and would be constructed on the same project site, on the northeastern portion of the subject property. However, the square footage of the agricultural processor and freezer facility would be reduced by 25 percent compared to the proposed project. Specifically, Alternative 2 would include a Conditional Use Permit and Development Plan to allow development of a 336,936 square-foot agricultural processor and freezer facility on the 40-acre project site located in the northeastern portion of the subject property. Other components of Alternative 2 would include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

Table 6-1 provides the characteristics of Alternative 2, including the building area for each primary component of the proposed processor and freezer facilities.

During the non-harvest season (August to May), Alternative 2 would require approximately 115 employees. During the harvest season (May to August), Alternative 2 would require approximately 467 employees.

Access to and from the project site would be from East Betteravia Road. Alternative 2 would provide approximately 167 permanent parking spaces and 274 233 permanent/seasonal parking spaces, for a total of 441 399 parking spaces. Alternative 2 would also provide 9 handicap ADA-compliant parking spaces.

Alternative 2 would include landscaping, primarily along the eastern and western perimeters, in stormwater retention areas and basins and in the parking areas. All wastewater generated from the processor would be treated and discharged into a 75,000 square foot process wastewater basin on the eastern portion of the project site.

**Table 6-1 Characteristics of Alternative 2: 25 Percent Reduced Alternative**

<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors)</b>		
<b>For Processor</b>		
Processing	57,278 sf	
Cooler	7,875 sf	
Dry Storage/Warehousing	14,781 sf	
Administrative	11,557 sf	
Maintenance	4,168 sf	
Canopy	8,144 sf	(not included in total)
Processor Subtotal	95,659 sf	
<b>For Freezer</b>		
Freezer	197,787 sf	
Dock	24,588 sf	
Blast Freezer	7,707 sf	
Administrative	5,417 sf	
Mechanical	5,778 sf	
Freezer Subtotal	241,277 sf	
<b>Total Processor and Freezer Operational Gross Floor Area</b>	<b>336,936 sf</b>	
sf = square feet		

Alternative 2 would meet all four primary objectives for the project listed below, but to a lesser extent than the proposed project because of the reduced size of the agricultural processing and freezer facility.

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

**Alternative 3: Alternative Location on Subject Property**

Alternative 3 would include the same components and densities as the proposed project but would be constructed on the southeastern portion of the subject property, approximately 1,500 feet

southwest of the proposed project location, with site access via Prell Road. Specifically, Alternative 3 would include a Conditional Use Permit and Development Plan to allow development of a 449,248 square-foot gross floor area agricultural processor and freezer facility on a 40-acre project site located in the southeastern portion of the subject property. The location of the project site for Alternative 3 is shown in Figure 6-1. Other components of Alternative 3 would include dry storage/warehousing space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking.

Table 6-2 provides the characteristics of Alternative 3, including the building area for each the primary components of the proposed processor and freezer facilities.

During the non-harvest season (August to May), Alternative 3 would require approximately 153 employees. During the harvest season (May to August), Alternative 3 would require approximately 623 employees.

Access to and from the project site would be from Prell Road. Similar to the proposed project, Alternative 3 would provide ~~223~~ 222 permanent parking spaces and ~~365~~ 310 permanent/seasonal parking spaces, for a total of ~~588~~ 532 parking spaces. Alternative 3 would also provide 12 ~~handicap~~ ADA-compliant parking spaces.

Alternative 3 would include landscaping, primarily along the eastern and western perimeters, in stormwater retention areas and basins, and in the parking areas. All wastewater generated from the processor would be treated and discharged into a 100,000 square foot process wastewater basin on the eastern portion of the project site.

This alternative would meet all four of the primary objectives for the project, which are as follows:

- To develop the site with a use that preserves the agricultural heritage and productivity of the property consistent with the goals of the County of Santa Barbara Agricultural Element;
- To assist area agricultural producers in expanding agricultural production by providing support infrastructure that maximizes of capacity of existing acreage under production;
- To provide infrastructure that assists area growers to access additional and diverse markets through the region, nation, and internationally; and
- To provide increased occupational opportunities in the agricultural community.

## 6.3 Impact Analysis

A comparative analysis of the potential impacts of the three project alternatives described in Section 6.2.2, Description of Alternatives Evaluated, is provided in Sections 6.3.1, 6.3.2, and 6.3.3 below. A comparison of the environmental impacts from development of the proposed project and each of the three proposed alternatives in provided in Section 6.2.

Figure 6-1 Subject Property and Alternative 3 Project Site Boundary



**Table 6-2 Characteristics of Alternative 3: Alternative Location on Subject Property**

<b>Structural Gross Floor Area (including 1<sup>st</sup> and 2<sup>nd</sup> floors)</b>		
<b>For Processor</b>		
Processing	76,371 sf	
Cooler	10,500 sf	
Dry Storage/Warehousing	19,708 sf	
Administrative	15,410 sf	
Maintenance	5,557 sf	
Canopy	10,859 sf	(not included in total)
Processor Subtotal	127,546 sf	
<b>For Freezer</b>		
Freezer	263,716 sf	
Dock	32,784 sf	
Blast Freezer	10,276 sf	
Administrative	7,222 sf	
Mechanical	7,704 sf	
Freezer Subtotal	321,702 sf	
<b>Total Processor and Freezer Operational Gross Floor Area</b>	<b>449,248 sf</b>	

sf = square feet

### 6.3.1 Alternative 1: No Project Alternative

Under this alternative, the project site would not be developed with an agricultural processor and freezer facility and would remain in active agricultural production. Additionally, the three former petroleum wells on the project site would not be re-abandoned to current California Geologic Energy Management Division (CalGEM) standards. This alternative would not result in any increase in employee trips or truck trips to the project site, or any other increase in vehicle trips. This alternative would also not result in new uses that would increase criteria pollutant and GHG emissions, energy consumption, noise, solid waste generation, or water consumption. This alternative would not result in construction of new uses on the agricultural project site; therefore, this alternative would not result in impacts associated with aesthetics, agricultural resources, biological resources, cultural and tribal cultural resources, geologic hazards, or hydrology and water quality. This alternative would not introduce the use of new hazardous materials, such as anhydrous ammonia, propane, diesel, and natural gas. However, use of fertilizers and pesticides associated with the ongoing agricultural operations would continue. In addition, there would be a greater potential for oil leaks from the on-site wells because they would not be re-abandoned to current standards. Overall, the magnitude of potential impacts would be eliminated in comparison to the impacts identified for the proposed project with the exception of hazards and hazardous materials. This alternative would not trigger the need for any of the mitigation measures identified in this EIR. The No Project Alternative would result in reduced physical environmental impacts when compared to the proposed project. The No Project Alternative would preserve the agricultural heritage and productivity of the property. However, this alternative would not fulfill the project objectives to assist area agricultural producers in expanding agricultural production and accessing additional and diverse markets by providing support infrastructure that maximizes the capacity of existing acreage under production; and increasing occupational opportunities in the agricultural community.

### 6.3.2 Alternative 2: 25 Percent Reduced Alternative

#### **Aesthetics**

Alternative 2 would be located on the same site as the proposed project. Alternative 2 would include development of a visually similar agricultural processor and freezer facility, but at a smaller scale, as the proposed project. Similar to the proposed project, Alternative 2 would introduce new structural development that would obstruct currently unimpeded views of the landscape in an agriculturally zoned area. However, the proposed development would be visually consistent with existing nearby development, including the existing produce processing and cooling warehouse across Betteravia Road to the north. Alternative 2 would not obscure a designated scenic view. Therefore, Alternative 2's impact to scenic vistas would be reduced in comparison to the proposed project due to the smaller scale of the proposed facility and would remain less than significant.

Similar to the proposed project, the structure proposed as part of Alternative 2 would not be prominently visible from U.S. 101, an eligible scenic highway, and would not obscure views of the more distant hillsides. Similar to the proposed project, there would be no impact to scenic resources within a State-designated scenic highway.

Alternative 2 would alter the existing visual character of the project site and would change the character of public views from adjacent roadways. Alternative 2 would be required to comply with applicable County of Santa Barbara Land Use and Development Code (LUDC) requirements to ensure the development would be visually compatible with nearby structures and the surrounding agricultural landscape. Therefore, this impact would be reduced in comparison to the proposed project due to the smaller scale of the proposed facility and would remain less than significant.

Similar to the proposed project, Alternative 2 would introduce new sources of light and glare to the project site. However, due to the smaller development compared to the proposed project, Alternative 2 would result in less light and glare compared to the proposed project. All proposed lighting would be required to comply with LUDC lighting requirements. Additionally, the project would be subject to review by the North County Board of Architectural Review (NBAR). Overall, potential impacts associated with light and glare would be reduced in comparison to the proposed project, and would remain less than significant.

#### **Agricultural and Forestry Resources**

Alternative 2 would be located on the same project site as the proposed project. No forestry resources are located on the project site and no impacts would occur. Similar to the proposed project, Alternative 2 would result in the direct conversion of Farmland Mapping and Monitoring Program (FMMP)-designated Prime Farmland and Unique Farmland. However, due to the reduced project size, Alternative 2 would result in the conversion of less acreage of designated farmland on the project site compared to the proposed project. However, the existing property is an agriculturally viable property, and the property with Alternative 2 would remain agriculturally viable. As with the proposed project, impacts to farmland would be reduced in comparison to the proposed project and would remain less than significant.

#### **Air Quality**

Similar to the proposed project, Alternative 2 would be within growth forecast assumptions used in the 2019 Ozone Plan. Impacts related to conflict or obstruction with an air quality plan would be less than significant.

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Alternative 2 would require less construction activity and would therefore generate lower construction emissions compared to the proposed project. Similar to the proposed project, construction of Alternative 2 would not exceed the 25 pounds per day of NO<sub>x</sub> and reactive organic compounds (ROC) emission thresholds. Alternative 2 would be required to implement Santa Barbara County Air Pollution Control District (SBCAPCD) standard dust control and equipment exhaust measures. Construction emissions for Alternative 2 would be reduced in comparison to the proposed project and would remain less than significant.

Assuming that the 25 Percent Reduced Alternative would result in a 25 percent reduction in emissions compared to the proposed project, the total NO<sub>x</sub> emissions during operation would be 285.8 pounds per day and the mobile source NO<sub>x</sub> emissions during operation would 268.2 pounds per day. This would exceed the Santa Barbara County thresholds of 55 pounds per day for all sources and 25 pounds per day for mobile source emissions and operational air quality impacts would be significant prior to mitigation. Alternative 2 would be required to implement Mitigation Measure AQ-1 to reduce operational emissions. In addition, the project applicant would be required to comply with the California Air Resources Board's (CARB's) air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and transportation refrigeration units. However, because produce would be delivered using trucks from other regions of California and Baja, the project applicant would not be able to require truck fleets to incorporate zero or near-zero emissions technologies. Therefore, long-term NO<sub>x</sub> emissions would continue to exceed the Santa Barbara County operational emission thresholds. Operational emissions would be reduced in comparison to the proposed project, but would remain significant and unavoidable.

Alternative 2 would generate fewer truck trips for loading and unloading of products at the warehouse compared to the proposed project. Therefore, Alternative 2 would result in fewer emissions from truck traffic and idling compared to the proposed project. CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* includes the recommendation that distribution centers should be located more than 1,000 feet from sensitive land uses. The closest sensitive receptors are located approximately 2,000 feet from the proposed facility location. Therefore, the siting of the Alternative 2 building would be within CARB's recommended distance and long-term operational emissions from sources such as stationary idling emissions from trucks would not be expected to impact sensitive receptors. Similar to the proposed project, diesel exhaust associated with moving trucks at any one receptor location would occur for a limited duration. Alternative 2 would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be reduced in comparison to the proposed project, but would remain less than significant.

Similar to the proposed project, the proposed agricultural processing and freezer facility for Alternative 2 could produce odors from diesel exhaust emissions, food and other agricultural waste, and the on-site wastewater basin and leach field. The nearest sensitive receptors (residences) are located approximately 2,000 feet from the project site. Due to the distance between the project site and sensitive receptors, the nearby residential uses would not be affected by any odors generated on the project site. Impacts related to odors would be less than significant, similar to the proposed project.

## **Biological Resources**

The project site does not include riparian habitat, sensitive natural communities, or trees and is not within a Habitat Conservation Plan or Natural Community Conservation Plan area. Additionally, the project site lacks suitable habitat for special status plants and no impacts to special-status plants

would occur. Therefore, similar to the proposed project, Alternative 2 would not result in impacts related to these topics.

The main opportunity for potential wildlife migratory movement would be within the constructed irrigation drainage, which would retain its conveyance capacity throughout project activities, and would continue to allow for wildlife movement. Therefore, similar to the proposed project, Alternative 2 would not result in impacts to migratory wildlife corridors.

California red-legged frog, southwestern pond turtle, tri-Colored blackbird, and nesting birds have the potential to occur within and in close proximity to the irrigation ditches on the project site. Similar to the proposed project, Alternative 2 would include construction within the irrigation drainages for construction of access road and utility crossings. Therefore, construction of Alternative 2 has the potential to impact these special-status animal species, although less ground disturbance would be required that could impact these species. Alternative 2 would be required to implement similar Mitigation Measures BIO-1 through BIO-3 to reduce direct and indirect impacts to special status species from construction. These measures include pre-construction surveys, construction personnel training, and ceasing of construction activities and coordination with the United States Fish and Wildlife Service and/or California Department of Fish and Wildlife (CDFW) in the event special-status species are found during surveys. With implementation of mitigation measures, impacts to special-status species would be reduced to a less than significant level, and reduced overall in comparison to the proposed project.

The irrigation drainage crossings would be the same as those required for the proposed project, and would result in similar impacts to CDFW and Regional Water Quality Control Board jurisdiction. Alternative 2 would be required to implement Mitigation Measures BIO-4 and BIO-5, similar to the proposed project, which requires preparation of a Habitat Mitigation and Monitoring Plan, compensatory mitigation, and implementation of Best Management Practices (BMPs) to mitigate and reduce impacts to jurisdictional waters. With implementation of mitigation measures, impacts to jurisdictional waters would be reduced to a less than significant level, similar to the proposed project.

## **Cultural Resources and Tribal Cultural Resources**

No known archaeological resources are located on the project site. However, there is a potential for unknown archaeological resources to be encountered during construction. Less ground disturbance would be required for Alternative 2 compared to the proposed project, therefore there would be less potential to encounter unknown archaeological resources. Similar to the proposed project, Alternative 2 would be required to implement Mitigation Measure CUL-1, which requires that construction activities halt in the event of an unanticipated discovery until the find can be assessed by a qualified archaeologist. With implementation of mitigation, impacts related to archaeological resources would be reduced to a less than significant level, and reduced in comparison to the proposed project.

No human remains or prehistoric villages are known to exist within the project site. Similar to the proposed project, in the event of an unanticipated discovery of human remains, all construction activities would halt in the vicinity of the discovery and the County Coroner would be contacted immediately in compliance with the State of California Health and Safety Code Section 7050.5. Impacts related to human remains would be less than significant, similar to the proposed project.

During project ground disturbing activities such as grading and surface excavation, there is potential for encountering previously undiscovered cultural resources of Native American origin that could be considered tribal cultural resources and impacts would be potentially significant. Less ground



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disturbance would be required for Alternative 2 compared to the proposed project, therefore there would be less potential to encounter tribal cultural resources. Similar to the proposed project, Mitigation Measure CUL-2 would be implemented, which requires consultation with local Native American tribes and implementation of a tribal cultural resource mitigation plan in the event that a tribal cultural resource is identified during construction. With implementation of mitigation, impacts to tribal cultural resources would be reduced to a less than significant level, and reduced in comparison to the proposed project.

**Energy**

Due to the reduced size of the agricultural processor and freezer facility, Alternative 2 would result in less energy consumption during construction and operation compared to the proposed project. As with the proposed project, this evaluation assumes that construction contractors for Alternative 2 would maintain construction equipment and avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Additionally, Alternative 2 would be required to comply with all building design standards set in California Building Code (CBC) Title 24, which would include implementation of energy efficiency measures to minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. Therefore, impacts which relate to inefficient, wasteful, and unnecessary use of energy would be reduced in comparison to the proposed project and would remain less than significant.

Alternative 2 would comply with all applicable state energy efficiency requirements, such as Title 24, and would implement all required energy efficiency measures where applicable. Therefore, similar to the proposed project, Alternative 2 would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

**Geology and Soils**

Alternative 2 would involve a smaller grading footprint and less construction compared to the proposed project. The geology and soil hazards would be similar to the proposed project because Alternative 2 would be constructed on the same project site. While some construction specifications would be different for Alternative 2 when compared to the proposed project, the overall risks related to seismic ground shaking, soil erosion, liquefaction, unstable soil, and expansive soils would be similar, and result in less than significant environmental impacts. As with the proposed project, there would be no impact related to fault rupture and landslides.

Similar to the proposed project, wastewater from Alternative 2 would be collected and treated in an on-site process wastewater basin. Percolation rates of on-site soils have been found suitable to accommodate the proposed wastewater basin. The County Environmental Health Services (EHS) department would review the project as part of the permitting process to ensure the proposed wastewater basin is designed and constructed consistent with the County standards. Therefore, this impact regarding soil suitability for the proposed on-site wastewater basin would remain less than significant, similar to the proposed project.

A portion of the project site is underlain by Saugus Formation (Qs) geologic units, which have a high paleontological sensitivity. Because Alternative 2 would require less grading and excavation than the proposed project, construction of Alternative 2 would have a reduced potential to disturb or destroy previously unidentified paleontological resources. Alternative 2 would be required to implement Mitigation Measures GEO-1 and GEO-2 to reduce impacts to paleontological resources, similar to the proposed project to reduce impacts to paleontological resources. These mitigation measures require implementation of a worker environmental awareness program for paleontological resources, which

would ensure contractors and employees can recognize potential paleontological resources uncovered during construction, and to stop work when unanticipated resources are discovered which would protect unanticipated resources as they are discovered. With implementation of required mitigation, impacts related to paleontological resources would remain less than significant, similar to the proposed project.

## **Greenhouse Gas Emissions**

Alternative 2 would result in less GHG emissions during construction and operation compared to the proposed project. Alternative 2 would have 25 percent less production capacity than the proposed project and would have proportionally reduced vehicle trips, electricity use, natural gas use, waste generation, water consumption, and stationary equipment use. Therefore, Alternative 2 would result in 25 percent fewer GHG total emissions in comparison to the proposed project. Alternative 2 would also require 25 percent fewer employees compared to the proposed project (203 employees on a time weighted average). Because the County uses a service population threshold for GHG emissions, the reduced emissions would also be assessed against a proportionally reduced service population. As a result, per-service-population GHG emissions from this alternative would be the same as the proposed project and would continue to exceed the County's GHG significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Similar to the proposed project, Alternative 2 would be required to implement Mitigation Measure GHG-1 to reduce GHG emission. However, quantifying potential GHG reductions from feasible mitigation measures would be speculative due to uncertainty regarding the implementation of such measures. As a result of the speculative nature of quantifying potential achievable GHG emissions reductions, as well as the magnitude of the exceedance of the County's adopted GHG emissions threshold, and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), impact from GHG emissions would remain significant and unavoidable. Therefore, impacts related to GHG emissions would be reduced in comparison to the proposed project but would remain significant and unavoidable.

## **Hazards and Hazardous Materials**

Similar to the proposed project, Alternative 2 would not be located in close proximity to schools, within an airport planning area, or within a high or very high fire hazard severity zone. Construction of new agricultural structures on the project site would not impair implementation of, or physically interfere with, the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. Therefore, Alternative 2 would result in no impact related to these issues, similar to the proposed project.

Construction and operation of Alternative 2 would require the transport, use, and disposal of hazardous materials but at smaller quantities than the proposed project due to the reduced project site. Transport, use, and disposal of hazardous materials would comply with applicable State and federal regulations governing hazardous materials. During operation, use of propane, diesel fire, natural gas, and anhydrous ammonia would be required but at smaller quantities than the proposed project. Use of these substances could pose a risk to public safety and the environment from accidental release or explosion. As with the proposed project, Alternative 2 would be required to implement Mitigation Measure HAZ-1, which requires consultation with EHS and preparation of a Release Response Plan and/or Hazardous Materials Inventory, if required by EHS. With implementation of mitigation, impacts would be reduced in comparison to the proposed project and would remain less than significant.

The project site is included on lists of hazardous material sites compiled pursuant to Government Code Section 65962.5 for a prior unauthorized release from the petroleum wells, sumps, pipelines

and other facilities associated with the Unocal Vincent B Lease oil field located on the subject property. Similar to the proposed project, EHS would be required to be contacted in the event that unknown hazardous waste or materials are encountered during excavation, as required by Mitigation Measure HAZ-2. The three petroleum wells within the project site would be required to be re-abandoned to current CalGEM standards. A No Further Action letter would be required to be obtained from EHS to verify that the project site has been remediated to current regulatory standards and does not represent a threat to public health or the environment, as required by HAZ-3. With implementation of mitigation, impacts associated with the on-site petroleum wells would be reduced to a less than significant level, similar to the proposed project.

## **Hydrology and Water Quality**

Similar to the proposed project, Alternative 2 would not be located within a 100-year floodplain, areas subject to flood from dam failure, or seiche or tsunami inundation zones. Therefore, similar to the proposed project, Alternative 2 would not impede or redirect flood flows or result in risk of release of pollutants due to project inundation.

Stormwater runoff from Alternative 2 would discharge to irrigation ditches and would not discharge to a receiving water (such as the Santa Maria River) with beneficial uses or water quality objectives. Additionally, there is not a Groundwater Sustainability Plan applicable to the groundwater basin. Similar to the proposed project, Alternative 2 would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Construction and operation of Alternative 2 would generate pollutants of concern that could enter stormwater. Less ground disturbance would be required for Alternative 2 compared to the proposed project, therefore water quality impacts would be reduced compared to the proposed project. Similar to the proposed project, Alternative 2 would be required to comply with National Pollutant Discharge Elimination Permit (NPDES) and County requirements, including implementing BMPs to reduce pollutants of concern. Alternative 2 would include a retention/infiltration basin that would be sized to treat and retain all stormwater runoff from the design storm. With implementation of Best Management Practices, water quality impacts would be reduced in comparison to the proposed project and would remain less than significant.

Similar to the proposed project, Alternative 2 would include installation of a new groundwater well to service the processor and freezer facility. Alternative 2 would require 25 percent less water for operation compared to the proposed project. Similar to the proposed project, this would result in a decrease in groundwater demand compared to existing conditions which would have little to no impact to groundwater levels. Impacts to groundwater supplies would be reduced in comparison to the proposed project and would remain less than significant.

## **Land Use and Planning**

Similar to the proposed project, Alternative 2 would not include any project components that would divide an established community. The project design and features would not conflict with any applicable policies of the County of Santa Barbara Comprehensive Plan for the same reasons as the proposed project (detailed in Appendix J) and impacts would be less than significant, similar to the proposed project.

Alternative 2 would introduce new structural development that would alter the existing visual character and obstruct currently unimpeded views of the landscape in a primarily rural and agricultural area, but to a lesser extent than the proposed project. Compliance with applicable LUDC

requirements would ensure Alternative 2 would be visually compatible with nearby structures and the surrounding agricultural landscape. Similar to the proposed project, Alternative 2 would not create a noise or traffic impact that would degrade quality of life. Impacts related to incompatibility or conflict with adjacent uses would be reduced in comparison to the proposed project, and would remain less than significant.

## **Mineral Resources**

Similar to the proposed project, Alternative 2 would require re-abandonment of three former petroleum wells. There are no locally identified mineral resources on the project site. Therefore, as with the proposed project, Alternative 2 would not result in the loss of availability of a valuable known mineral resource or locally important mineral resource recovery site. Similar to the proposed project, no impacts to mineral resources would occur.

## **Noise**

Temporary construction-related noise impacts would be reduced for Alternative 2 due to the reduced amount of construction activity required to construct the reduced project. Sensitive residential receivers are located approximately 1,650 feet to the southeast and would be exposed to similar temporary construction noise levels as for the proposed project, but for a shorter duration. Similar to the proposed project, construction noise levels would not exceed the County's noise standards. Construction noise impacts would be reduced in comparison to the proposed project and would remain less than significant.

Similar to the proposed project, construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be required. Vibration levels for Alternative 2 would be similar to the proposed project, but for a shorter duration. Similar to the proposed project, vibration levels at the nearest sensitive receivers would be below levels that would result in distinctly perceptible impacts for humans or to building structures. Therefore, temporary vibration impacts during construction would be reduced in comparison to the proposed project, and would remain less than significant.

Alternative 2 would not be located within the noise contours for any airports. Therefore, no substantial noise exposure would occur to construction workers or users of the project site from aircraft noise, similar to the proposed project. Similar to the proposed project, no impacts related to airport noise would occur.

Due to the reduced project size, Alternative 2 would introduce less operation noise from on-site sources, including boilers, forklifts, a diesel fire pump engine, and condensers. Alternative 2 would also result in less project-generated traffic on area roadways, reducing potential traffic noise impacts compared to the proposed project. Similar to the proposed project, operational noise impacts would be reduced in comparison to the proposed project and would remain less than significant.

## **Population and Housing**

Similar to the proposed project, Alternative 2 would not directly generate population growth because it does not include residential uses. Alternative 2 would provide for fewer employment opportunities compared to the proposed project due to the reduced size of the agricultural processor and freezer facility. Alternative 2 may indirectly increase the population if new employees relocate to Northern Santa Barbara County or Santa Maria, but to a lesser extent than the proposed project. However, similar to the proposed project, these jobs would likely be filled by persons already residing in the City

of Santa Maria. Therefore, although the Alternative 2 would provide employment opportunities, it would not result direct population growth or result in substantial indirect growth. This impact would be reduced in comparison to the proposed project and would remain less than significant.

Alternative 2 would not displace any housing or people or require construction of replacement housing elsewhere, as the project site is currently used for agriculture and is not developed with housing. Similar to the proposed project, there would be no impacts related to displacement of housing or people.

### **Public Services**

Similar to the proposed project, Alternative 2 would not directly generate population growth or result in a need for additional public services or facilities. Employment opportunities associated with the Alternative 2 would likely be filled by persons already residing in and around the City of Santa Maria. However, Alternative 2 may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and increase demand for public services or facilities if new employees relocated to the surrounding area. However, the indirect increase in demand for public services or facilities would be less in comparison to proposed project due to the reduced number of employees. Overall, impacts to existing public services and facilities or potential impacts associated with the need for new or expanded public services and facilities would be reduced in comparison to the proposed project, and would remain less than significant.

### **Recreation**

Similar to the proposed project, Alternative 2 would not directly generate population growth that would result in a need for additional parkland. Alternative 2 would provide for fewer employment opportunities compared to the proposed project due to the reduced size of the agricultural processor and freezer facility. However, similar to the proposed project, employment opportunities associated with Alternative 2 would likely be filled by persons already residing in and around the City of Santa Maria. No new public parklands would be developed as part of Alternative 2. However, Alternative 2 may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and result in demand for parkland if new employees relocated to the surrounding area, but to a lesser extent than the proposed project. Impacts related to recreation would be reduced in comparison to the proposed project and would remain less than significant.

### **Transportation**

Alternative 2 would involve similar frontage improvements on Betteravia Road and similar project design features, such as roadway designs and driveway access, in comparison to the proposed project. Alternative 2 would not include elements that would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be similar to the proposed project and would remain less than significant.

The County VMT significance threshold states that a project's VMT generation would be less than significant if it does not exceed 15 percent below existing VMT/employee. The existing County average VMT was 15.8 VMT/employee; therefore, the threshold of significance for VMT is 13.4 VMT/employee. Alternative 2 would generate approximately 25 percent fewer trips than the proposed project. Therefore, regional vehicle miles traveled (VMT) generated by this alternative would be less in comparison to the proposed project. Similar to the proposed project, Alternative 2 would not exceed the VMT threshold. Alternative 2's contribution to regional VMT would be reduced in comparison to the proposed project, and would remain less than significant.

The frontage and driveway improvements would be designed pursuant to Santa Barbara County fire and safety code standards and would be reviewed for consistency with applicable County standards by the County Transportation Division. Impacts related to hazards associated with design features, emergency access, or incompatible uses would remain less than significant, similar to the proposed project.

## **Utilities and Service Systems**

As with the proposed project, Alternative 2 wastewater would be treated and discharged in an on-site wastewater basin in the eastern portion of the project site. Similar to the proposed project, no wastewater would be discharged to a wastewater treatment provider; therefore, potential impacts to a provider's treatment capacity would not occur.

Alternative 2 would involve construction of a smaller processor and freezer facility compared to the proposed project, and would result in less water demand, wastewater generation, electricity demand, and natural gas demand. Similar to the proposed project, there are adequate supplies and facilities available to accommodate the increased demand. Impacts would be reduced in comparison to the proposed project and would remain less than significant.

Alternative 2 would generate 25 percent less solid waste compared to the proposed project. A 336,936 square foot processor and freezer facility would result in approximately 539 tons of new solid waste per year during operation. This would exceed the 196 tons per year project-level threshold for operational solid waste generation and the 40 tons per year cumulative solid waste threshold. However, taking into consideration a 50 percent reduction that could be achieved through implementation of a SRWMP during operation (Mitigation Measure U-1), 269.5 tons of solid waste would be generated during operation. This would still exceed 196 tons per year project-level threshold and the 40 tons per year cumulative solid waste threshold. As with the proposed project, both project-level and cumulative solid waste impacts would be significant and unavoidable, albeit reduced in comparison to the proposed project.

A 336,936 square foot facility would result in 4,212 tons of solid waste during construction, which is 25 percent less in comparison to the proposed project but would still exceed the 350 tons of construction debris threshold. Taking into consideration the 50 percent reduction that could be achieved through implementation of a SRWMP during construction (Mitigation Measure U-2), 2,106 tons of solid waste would be generated during construction, which would still exceed the 350 tons of construction debris threshold. As with the proposed project, construction-related solid waste impacts would be significant and unavoidable, albeit reduced in comparison to the proposed project.

## **Wildfire**

As with the proposed project, the subject property is not located in a high or very high fire hazard severity zone within a local or State responsibility area. Additionally, the subject property and surrounding vicinity are under low to moderate fire threat and do not contain wildlands, forests, or dense vegetation that pose a wildfire risk. Therefore, similar to the proposed project, Alternative 2 would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Similar to the proposed project, no impacts related to wildfire would occur.

### 6.3.3 Alternative 3: Alternative Location on Subject Property

#### **Aesthetics**

Alternative 3 would be located on the southeastern portion of the subject property, south of the project site for the proposed project. Alternative 3 would include development of a visually similar agricultural processor and freezer facility at the same scale as the proposed project, but approximately 1,300 feet further from public views along Betteravia Road. Similar to the proposed project, Alternative 3 would introduce new structural development that would obstruct currently unimpeded views of the landscape in an agriculturally zoned area. However, the proposed development would be visually consistent with existing nearby development, including the existing produce processor and cooling warehouse across Betteravia Road to the north. Alternative 3 would not obscure a designated scenic view. Therefore, Alternative 3's impact to scenic vistas would be reduced compared to the proposed project, and would remain less than significant.

Similar to the proposed project, Alternative 3 would not be prominently visible from U.S. 101, an eligible scenic highway, and would not obscure views of the more distant hillsides. Similar to the proposed project, there would be no impact to scenic resources within a State-designated scenic highway.

Alternative 3 would alter to the existing visual character on the subject property and would change the character of public views from adjacent roadways. Alternative 3 would be required to comply with applicable County of Santa Barbara LUDC requirements to ensure the development would be visually compatible with nearby structures and the surrounding agricultural landscape. Therefore, this impact would be reduced compared the proposed project, and would remain less than significant.

Similar to the proposed project, Alternative 3 would introduce new sources of light and glare to the project site. Due to having the same scale of development compared to the proposed project, Alternative 3 would result in similar levels of light and glare compared to the proposed project. However, the light and glare would be closer to the residential developments located to the southeast of the subject property. All proposed lighting would be required to comply with LUDC lighting requirements. Additionally, the project would be subject to review by the NBAR. Overall, potential impacts associated with light and glare would be greater in comparison to the proposed project due to the closer proximity to the nearby residential development, but would remain less than significant.

#### **Agricultural and Forestry Resources**

No forestry resources are located on the subject property and no impacts would occur. The soils on the southeastern portion of the subject property are designated as Unique Farmland. The project site would be located on both Prime and Unique Farmland; however Alternative 3 would only be located on Unique Farmland. Therefore, Alternative 3 would result in the direct conversion of 40 acres of FMMP-designated Unique Farmland, which is considered Important Farmland. Alternative 3 would not result in impacts to Prime Farmland and would therefore result in reduced impacts to Prime Farmland compared to the proposed project. Similar to the proposed project, impacts to farmland would remain less than significant.

#### **Air Quality**

Similar to the proposed project, Alternative 3 would be within growth forecast assumptions used in the 2019 Ozone Plan. Impacts related to conflict or obstruction with an air quality plan would be less than significant and similar to the proposed project.

Alternative 3 would require the same amount of construction and would generate similar construction emissions compared to the proposed project. Similar to the proposed project, construction of Alternative 3 would not exceed the 25 pounds per day of NO<sub>x</sub> and ROC emission thresholds. Alternative 3 would be required to implement SBCAPCD standard dust control and equipment exhaust measures. Construction emissions for Alternative 3 would be less than significant, similar to the proposed project.

Alternative 3 would generate the same operational emissions and would be required to implement Mitigation Measure AQ-1 to reduce operational emissions that exceed applicable Santa Barbara County emission thresholds. In addition, the project applicant would be required to comply with CARB's air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and transportation refrigeration units. However, because produce would be delivered using trucks from other regions of California and Baja, the project applicant would not be able to require truck fleets to incorporate zero or near-zero emissions technologies. Therefore, long-term NO<sub>x</sub> emissions would continue to exceed the Santa Barbara County operational emission thresholds. Operational emissions would remain significant and unavoidable, similar to the proposed project.

Operation of Alternative 3 would generate the same number of truck trips for loading and unloading of products at the warehouse compared to the proposed project. Therefore, Alternative 3 would result in the same emissions from truck traffic and idling compared to the proposed project. CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* includes the recommendation that distribution centers should be located more than 1,000 feet from sensitive land uses. The closest sensitive receptors are would be located approximately 850 feet to the southeast of the Alternative 3 project site, 150 feet closer than the proposed project. Although slightly closer to sensitive receivers, the siting of the Alternative 3 building would not be within CARB's recommended distance and long-term operational emissions from sources such as stationary idling emissions from trucks could result in impacts to sensitive receptors. Because the Alternative 3 building would be closer to sensitive receptors compared to the proposed project, impacts to sensitive receptors from on-site emissions would be greater in comparison to the proposed project but would remain less than significant.

Similar to the proposed project, the proposed agricultural processing and freezer facility for Alternative 3 could produce odors from diesel exhaust emissions, food and other agricultural waste, and the on-site wastewater basin and leach field. The nearest sensitive receptors (residences) are located approximately 1,650 feet from the project site. Due to the distance between the project site and sensitive receptors, the nearby residential uses would not be affected by any odors generated on the project site. Impacts related to odors would be less than significant, similar to the proposed project.

## **Biological Resources**

The Alternative 3 project site contains similar biological resources as the project site for the proposed project. The subject property does not include riparian habitat, sensitive natural communities, or trees and is not within a Habitat Conservation Plan or Natural Community Conservation Plan area. Additionally, the project site lacks suitable habitat for special status plants and no impacts to special-status plants would occur. Therefore, similar to the proposed project, Alternative 3 would not result in impacts related to these topics.

The main opportunity for potential wildlife migratory movement on the subject property is the irrigation drainage along the northern and northeastern boundary of the subject property. The northeastern portion of Alternative 3 would be constructed adjacent to this drainage but would not



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cross or otherwise impact the drainage. This drainage would retain its conveyance capacity and would continue to allow for wildlife movement. Therefore, similar to the proposed project, Alternative 3 would not result in impacts to migratory wildlife corridors.

California red-legged frog, southwestern pond turtle, tri-Colored blackbird, and nesting birds have the potential to occur within and near the irrigation ditches on the project site. Unlike the proposed project, Alternative 3 would not include construction within the irrigation drainages. The access road and utilities would extend south to Prell Road and would not cross the irrigation drainage, as the drainage does extend to the southern boundary of the subject property. Therefore, construction of Alternative 3 would reduce impacts to these special-status animal species. However, impacts to these species would still have a potential to occur due to the proximity to the irrigation drainage. Alternative 3 would be required to implement Mitigation Measures BIO-1 through BIO-3 to reduce direct and indirect impacts to special status species from project construction, similar to the proposed project. These measures include pre-construction surveys, construction personnel training, and ceasing of construction activities and coordination with the United States Fish and Wildlife Service and/or CDFW in the event special-status species are found during surveys. Impacts to special-status species would be reduced in comparison to the proposed project and would remain less than significant with mitigation.

Because crossing of the irrigation drainage would not be required for Alternative 3, no impacts to CDFW and Regional Water Quality Control Board jurisdiction would occur. As a result, impacts to jurisdictional waters would be reduced compared to the proposed project, and would not require mitigation to be less than significant.

**Cultural Resources and Tribal Cultural Resources**

No known archaeologic resources are known to exist on this portion of the subject property; however, an archeological study, including a pedestrian survey, would be required for this portion of the subject property to confirm. Similar to the proposed project, there is a potential for unknown archaeological resources to be encountered during construction. As such, Alternative 3 would be required to implement Mitigation Measure CUL-1, which requires that construction activities halt in the event of an unanticipated discovery until the find can be assessed by a qualified archaeologist. With implementation of mitigation, impacts related to archaeological resources would be less than significant, similar to the proposed project.

No human remains or prehistoric villages are known to exist within the subject property or vicinity. Similar to the proposed project, in the event of an unanticipated discovery of human remains, all construction activities would halt in the vicinity of the discovery and the County Coroner would be contacted immediately in compliance with the State of California Health and Safety Code Section 7050.5. Impacts related to human remains would be less than significant, similar to the proposed project.

During project ground disturbing activities such as grading and surface excavation, there is potential for encountering previously undiscovered cultural resources of Native American origin that could be considered tribal cultural resources and impacts would be potentially significant. Similar to the proposed project, Mitigation Measure CUL-2 would be implemented, which requires consultation with local Native American tribes and implementation of a tribal cultural resource mitigation plan in the event that a tribal cultural resource is identified during construction. With implementation of mitigation, impacts to tribal cultural resources would be reduced to a less than significant level, similar to the proposed project.

## Energy

Alternative 3 would result in similar energy consumption during construction and operation compared to the proposed project. As with the proposed project, this evaluation assumes that construction contractors for Alternative 3 would maintain construction equipment and avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Additionally, Alternative 3 would be required to comply with all building design standards set in CBC Title 24, which would include implementation of energy efficiency measures to minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. Therefore, impacts relate to inefficient, wasteful, and unnecessary use of energy would be less than significant, similar to the proposed project.

Alternative 3 would comply with all applicable state energy efficiency requirements, such as Title 24 and would implement all required energy efficiency measures where applicable. Therefore, similar to the proposed project, Alternative 3 would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

## Geology and Soils

Alternative 3 would involve the similar sized grading footprint and similar construction as the proposed project. The geology and soil hazards would be similar to the proposed project because Alternative 3 would be constructed on an adjacent site on the same subject property with similar soil and geological characteristics. The overall risks related to seismic ground shaking, soil erosion, liquefaction, unstable soil, and expansive soils would be similar, and result in less than significant environmental impacts. As with the proposed project, there would be no impact related to fault rupture or landslides.

Similar to the proposed project, wastewater from Alternative 3 would be collected and treated in an on-site process wastewater basin. Due to the proximity of the Alternative 3 project site to the project site for the proposed project, which has soils suitable for percolation, the soils on the Alternative 3 project site would likely be suitable to accommodate the proposed wastewater basin. EHS would review the project as part of the permitting process to ensure the proposed wastewater basin is designed and constructed consistent with the County standards. Therefore, this impact regarding the soil suitability for the proposed on-site wastewater basin would remain less than significant, similar to the proposed project.

A portion of the project site for Alternative 3 is underlain by Qs geologic units, which has a high paleontological sensitivity. Because Alternative 3 would require the same amount of grading and excavation as the proposed project, construction of Alternative 3 would have a similar potential to disturb or destroy previously unidentified paleontological resources. Alternative 3 would be required to implement Mitigation Measures GEO-1 and GEO-2 to reduce impacts to paleontological resources, similar to the proposed project. These mitigation measures require implementation of a worker environmental awareness program for paleontological resources, which would ensure contractors and employees can recognize potential paleontological resources uncovered during construction, and stopping work when unanticipated resources are discovered, which would protect unanticipated resources as they are discovered. With implementation of required mitigation, impacts related to paleontological resources would remain less than significant, similar to the proposed project.

## **Greenhouse Gas Emissions**

Alternative 3 would result in similar GHG emissions during construction and operation compared to the proposed project. As with the proposed project, GHG emissions from Alternative 3 would be approximately 27,864 MT CO<sub>2</sub>e (102.8 MT CO<sub>2</sub>e per service population). These emissions would exceed the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Similar to the proposed project, Alternative 2 would be required to implement Mitigation Measure GHG-1 to reduce GHG emission. However, quantifying potential GHG reductions from feasible mitigation measures would be speculative due to uncertainty regarding the implementation of such measures. As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable, as well as the magnitude of the exceedance of the County's adopted GHG emissions threshold, and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), impact from GHG emissions would remain significant and unavoidable. Therefore, impacts related to GHG emissions would be significant and unavoidable, similar to the proposed project.

## **Hazards and Hazardous Materials**

Similar to the proposed project, Alternative 3 would not be located in close proximity to schools, within an airport planning area, or within a high or very high fire hazard severity zone. Construction of new agricultural structures on the project site would not impair implementation of, or physically interfere with, the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. Therefore, similar to the proposed project, Alternative 3 would result in no impact related to these topics.

Construction and operation of Alternative 3 would require the transport, use, and disposal of hazardous materials but at the same quantities as the proposed project. Transport, use, and disposal of hazardous materials would comply with applicable State and federal regulations governing hazardous materials. During operation, use of the same quantities of propane, diesel fire, natural gas, and anhydrous ammonia would be required as the proposed project. Use of these substances could pose a risk to public safety and the environment from accidental release or explosion. Alternative 3 would be required to implement similar Mitigation Measure HAZ-1, which requires consultation with EHS and preparation of a Release Response Plan and/or Hazardous Materials Inventory, if required by EHS. With implementation of mitigation, impacts would be less than significant, similar to the proposed project.

The subject property, including the project site for Alternative 3, is included on lists of hazardous material sites compiled pursuant to Government Code Section 65962.5 for a prior unauthorized release from the petroleum wells, sumps, pipelines and other facilities associated with the Unocal Vincent B Lease oil field located on the subject property. Similar to the proposed project, EHS would be required to be contacted in the event that unknown hazardous waste or materials are encountered during excavation, as required by Mitigation Measure HAZ-2. Alternative 3 would be located on the southeastern portion of the subject property, where two former petroleum wells, tank battery, and oil lines are located. Alternative 3 would be located on a portion of the subject property with more oil-related infrastructure than the project site for the proposed project. Alternative 3 would likely require re-abandonment of the former petroleum wells, tank battery, and oil lines to current CalGEM standards. A No Further Action letter would likely be required to be obtained from EHS to verify that the project site has been remediated to current regulatory standards and does not represent a threat to public health or the environment, as required by HAZ-3. Additionally, due to the location of the two former petroleum wells, it is likely that the processor and freezer facility would be required to be constructed over the wells. In their Notice of Preparation (NOP) response letter dated November 18,

2020, CalGEM advised against building over or impeding access to the wells. Due to the potential for Alternative 3 to impede access to these wells, impacts would be greater in comparison to the proposed project but would remain less than significant with mitigation.

## **Hydrology and Water Quality**

Similar to the proposed project, Alternative 3 would not be located within a 100-year floodplain, areas subject to flood from dam failure, or seiche or tsunami inundation zones. Therefore, similar to the proposed project, Alternative 3 would not impede or redirect flood flows or result in risk of release of pollutants due to project inundation.

Stormwater runoff from Alternative 3 would discharge to irrigation ditches and would not discharge to a receiving water (such as the Santa Maria River) with beneficial uses or water quality objectives. Additionally, there is not an applicable Groundwater Sustainability Plan applicable to the groundwater basin. Similar to the proposed project, Alternative 3 would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Construction and operation of Alternative 3 would generate pollutants of concern that could enter stormwater. However, Alternative 3 would be required to comply with NPDES and County requirements, including implementing BMPs to reduce pollutants of concern. Similar to the proposed project, Alternative 3 would include a retention/infiltration basin that would be sized to treat and retain all stormwater runoff from the design storm. With implementation of BMPs, water quality impacts would be less than significant, similar to the proposed project.

Alternative 3 would include installation of a new groundwater well to service the processor and freezer facility. Alternative 3 would result in the same amount of water demand for operation as the proposed project. Like to the proposed project, this would result in a small decrease in groundwater demand compared to existing conditions which would have little to no impact to groundwater levels. Impacts to groundwater supplies would be less than significant, similar to the proposed project.

## **Land Use and Planning**

Similar to the proposed project, Alternative 3 would not include any project components that would divide an established community. The project design and features would not conflict with any applicable policies of the County of Santa Barbara Comprehensive Plan for the same reasons as the proposed project (detailed in Appendix J) and impacts would be less than significant, similar to the proposed project.

Alternative 3 would include the same size building as the proposed project, but in a different location on the subject property. Similar to the proposed project, Alternative 3 would introduce new structural development that would alter the existing visual character and obstruct currently unimpeded views of the landscape in a primarily rural and agricultural area. Compliance with applicable LUDC requirements would ensure Alternative 3 would be visually compatible with nearby structures and the surrounding agricultural landscape. Similar to the proposed project, Alternative 3 would not create a noise or traffic impact that would degrade quality of life. Impacts related to incompatibility or conflict with adjacent uses would be less than significant, similar to the proposed project.

## **Mineral Resources**

Alternative 3 would be located on the southeastern portion of the subject property, where two former petroleum wells, tank battery, and oil lines are located. Alternative 3 would be located on a portion of the subject property with more oil-related infrastructure than the project site for the

proposed project. Alternative 3 would likely require re-abandonment of the former petroleum wells, tank battery, and oil lines to current CalGEM standards. Alternative 3 would not require abandonment of any active petroleum wells. There are no locally identified mineral resources on the Alternative 3 project site. Therefore, similar to the proposed project, Alternative 3 would not result in the loss of availability of a valuable known mineral resource or locally important mineral resource recovery site.

## **Noise**

Temporary construction-related noise impacts would be greater for Alternative 3 than for the proposed project due to the closer proximity to sensitive receivers. Sensitive residential receivers are located approximately 850 feet to the southeast of the Alternative 3 project site (approximately 1,300 feet closer than the proposed project) and would be exposed to the greater levels of temporary construction noise compared to the proposed project. Construction noise levels could exceed the County's noise standards. In addition, construction would occur within 1,600 feet of sensitive receivers, the distance specified by the County as potentially resulting in a significant construction noise impact. Mitigation measures, such as a temporary noise barrier, may be required for Alternative 3 to reduce construction noise at the nearby sensitive receivers to less than significant. The proposed project did not result in significant impacts related to construction noise and did not require mitigation. Therefore, construction noise impacts would be greater in comparison to the proposed project but would remain less than significant with mitigation.

Similar to the proposed project, construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be required. Construction would occur approximately 1,300 feet closer to sensitive receivers; therefore, vibration levels at sensitive receivers would be greater for Alternative 3 compared to the proposed project. However, the greatest source of vibration would be a dozer which would create approximately 0.089 in/sec PPV at a distance of 25 feet, which would still be below vibration thresholds of 0.24 in/sec at the nearest sensitive receivers. Vibration levels at the nearest sensitive receivers would be below levels that would result in distinctly perceptible impacts for humans or cause structural damage to buildings. Because of the closer proximity to sensitive receivers, vibration impacts and would be greater than for the proposed project, but would remain less than significant, similar to the proposed project.

Alternative 3 would not be located within the noise contours for any airports. Therefore, no substantial noise exposure would occur to construction workers or users of the project site from aircraft noise, similar to the proposed project.

Alternative 3 would introduce the same operation noise from on-site sources, including boilers, forklifts, a diesel fire pump engine, and condensers. However, the on-site noise sources would be located approximately 850 feet to the southeast of the Alternative 3 project site, which is approximately 1,300 feet closer to sensitive receivers compared to the proposed project. Operational noise levels from Alternative 3 would be greater in comparison to the proposed project and may exceed the applicable County noise standards. Mitigation measures such as masonry sound barriers may be required to reduce operational noise from this alternative at nearby sensitive receivers. A masonry barrier that obstructs line-of-sight between the noise source and receiver typically will attenuate sound by a minimum of 10 dBA. On-site operational noise impacts would be greater in comparison to the proposed project but would remain less than significant with mitigation.

Alternative 3 would also result in the same number of project-generated trips; however, these trips would originate at the project entrance on Prell Road instead of Betteravia Road. Compared to the proposed project, traffic noise would be closer to the sensitive residential receivers to the southeast of the subject property. However, traffic noise from Alternative 3 would not exceed County noise

standards and would be greater in comparison to the proposed project, but would remain less than significant.

### **Population and Housing**

Similar to the proposed project, Alternative 3 would not directly generate population growth because it does not include residential uses. Alternative 3 would provide the same number of employment opportunities as the proposed project. Alternative 3 may indirectly increase the population if new employees relocate to Santa Maria or the surrounding area. However, similar to the proposed project, these jobs would likely be filled by persons already residing in the City of Santa Maria. Therefore, although the Alternative 3 would provide employment opportunities, it would not result direct population growth or result in substantial indirect growth. This impact would be less than significant, similar to the proposed project.

Alternative 3 would not displace any housing or people or require construction of replacement housing elsewhere, as the subject property is currently used for agriculture and is not developed with housing. Similar to the proposed project, there would be no impacts related to displacement of housing or people.

### **Public Services**

Similar to the proposed project, Alternative 3 would not directly generate population growth or result in a need for additional public services or facilities. Employment opportunities associated with the Alternative 3 would likely be filled by persons already residing in and around the City of Santa Maria. However, Alternative 3 may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and increase demand for public services or facilities if new employees relocated to the surrounding area. Because Alternative 3 would require the same number of employees as the proposed project, the indirect increase in demand for public services or facilities would be similar to the proposed project. Overall, impacts to existing public services and facilities or potential impacts associated with the need for new or expanded public services and facilities would be less than significant, similar to the proposed project.

### **Recreation**

Similar to the proposed project, Alternative 3 would not directly generate population growth that would result in a need for additional parkland. Alternative 3 would provide the same number of employment opportunities as the proposed project. Employment opportunities associated with Alternative 3 would likely be filled by persons already residing in and around the City of Santa Maria. No new public parklands would be developed as part of Alternative 3. However, Alternative 3 may indirectly increase the population of northern Santa Barbara County or the City of Santa Maria and result in demand for parkland if new employees relocated to the surrounding area. Impacts related to recreation would be less than significant, similar to the proposed project.

### **Transportation**

Frontage improvements and access for Alternative 3 would be provided via Prell Road instead of Betteravia Road. However, similar to the proposed project, the frontage improvement and project design features, such as roadway designs and driveway access of Alternative 3 would be designed to County standards. Alternative 3 would not include elements that would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be less than significant, similar to the proposed project.

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Alternative 3 would generate the same number of vehicle trips as the proposed project. Therefore, regional VMT generated by this alternative would be similar to the proposed project and would not exceed the VMT threshold of 13.4 VMT/employee. Alternative 3's contribution to regional VMT would be less than significant, similar to the proposed project.

The frontage and driveway improvements would be required to be designed pursuant to Santa Barbara County fire and safety code standards and would be reviewed for consistency with applicable County standards by the County Transportation Division. Impacts related to hazards associated with design features, emergency access, or incompatible uses would be less than significant, similar to the proposed project.

**Utilities and Service Systems**

As with proposed project, Alternative 3 wastewater would be treated and discharged in an on-site wastewater basin in the eastern portion of the project site. Similar to the proposed project, no wastewater would be discharged to a wastewater treatment provider; therefore, potential impacts to a provider's treatment capacity would not occur.

Alternative 3 would involve construction of the same size processor and freezer facility as the proposed project and would result in similar water demand, wastewater generation, electricity demand, and natural gas demand. Similar to the proposed project, there are adequate supplies and facilities available to accommodate the increased demand. Impacts would be less than significant, similar to the proposed project.

Alternative 3 would involve the same amount of solid waste as the proposed project. The 449,248 processor and freezer facility would result in approximately 719 tons of new solid waste per year during operation. This would exceed the 196 tons per year project-level threshold for operational solid waste generation and the 40 tons per year cumulative solid waste threshold. However, taking into consideration a 50 percent reduction that could be achieved through implementation of a SRWMP during operation (Mitigation Measure U-1), 359.5 tons of solid waste would be generated during operation. This would still exceed 196 tons per year project-level threshold and the 40 tons per year cumulative solid waste threshold. Project-level cumulative solid waste impacts would be significant and unavoidable, similar to the proposed project.

The 449,248 square foot facility would result in 5,616 tons of solid waste during construction, which would exceed the 350 tons of construction debris threshold. Taking into consideration the 50 percent reduction that could be achieved through implementation of a SRWMP during construction (Mitigation Measure U-2), 2,808 tons of solid waste would be generated during construction, which would still exceed the 350 tons of construction debris threshold. Therefore, construction-related solid waste impacts would be significant and unavoidable, similar to the proposed project.

**Wildfire**

As with the proposed project, the subject property is not located in a high, or very high fire hazard severity zone within a local or State responsibility area. Additionally, the subject parcel and surrounding vicinity are under low to moderate fire threat and do not contain wildlands, forests, or dense vegetation that would pose a wildfire risk. Therefore, similar to the proposed project, Alternative 3 would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Similar to the proposed project, no impacts related to wildfire would occur.

### 6.3.4 Comparison of Alternatives

A comparison of the environmental impacts from development of the proposed project and each of the three proposed alternatives are provided below in Table 6-3.

## 6.4 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids significant and unavoidable environmental impacts. In some cases, an alternative will avoid one or more significant and/or unavoidable impacts identified for the proposed project but then introduce one or more new significant impacts. Therefore, selection of the environmentally superior alternative requires an overall assessment of the changes in the number and type of significant impacts.

The *CEQA Guidelines* do not define a specific methodology for determining the environmentally superior alternative. For the purposes of this analysis, the project alternatives have been compared within each issue area to the proposed project, and a determination has been made as to whether the potential environmental effects of each alternative would be reduced, increased, or is similar in comparison to the proposed project (refer to Table 6-3). For the purpose of this EIR, each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority.

The No Project Alternative (Alternative 1) would result in the fewest adverse environmental effects, and therefore would be considered environmental superior. However, since this is the No Project alternative, CEQA requires that a separate alternative also be identified as the environmentally superior alternative.

The 25 Percent Reduced Alternative (Alternative 2) would result in the fewer significant environmental impacts compared to the proposed project and Alternative 3. This alternative would reduce impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, hazardous and hazardous materials, hydrology and water quality, land uses, noise and vibration, population and housing, public services, parks and recreational facilities, transportation, and utilities and service systems. However, Alternative 2 would not reduce the project's significant solid waste, air quality, and GHG impacts below the applicable thresholds of significance. These environmental impacts would remain significant and unavoidable, as they are for the proposed project. Additionally, while Alternative 2 would meet all of the project objectives, it would be to a lesser extent than the proposed project because of the reduced size of the agricultural processor and freezer facility. Accordingly, this evaluation concludes that Alternative 2 is the environmentally superior alternative because it would result in reduced environmental impacts compared to the proposed project.



**Table 6-3 Comparison of Environmental Impacts**

Environmental Issue	Impact Classification			
	Proposed Project	Alternative 1	Alternative 2	Alternative 3
<b>Aesthetics</b>				
Impacts to Scenic Vistas	LTS	- NI	- LTS	- LTS
Impacts to State Scenic Highway	NI	- NI	= NI	= NI
Degradation of visual character and quality	LTS	- NI	- LTS	- LTS
Impacts from Light and Glare	LTS	- NI	- LTS	+ LTS
<b>Agricultural and Forestry Resources</b>				
Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use	LTS	- NI	- LTS	- LTS
Impacts to forestry resources	NI	= NI	= NI	= NI
<b>Air Quality</b>				
Conflict or obstruction of implementation of an air quality plan	LTS	- NI	= LTS	= LTS
Cumulatively considerable net increase of any criteria pollutant during construction	LTS	- NI	- LTS	= LTS
Cumulatively considerable net increase of any criteria pollutant during operation	SU	- NI	- SU	= SU
Exposure of sensitive receptors for substantial pollutant emissions	LTS	- NI	- LTS	+ LTS
Result in other emissions, such as odors	LTS	= LTS	= LTS	= LTS

Environmental Issue	Impact Classification			
	Proposed Project	Alternative 1	Alternative 2	Alternative 3
<b>Biological Resources</b>				
Impacts related to riparian habitat, sensitive natural communities, trees, wildlife movement, and special status plants	NI	= NI	= NI	= NI
Impacts to special status animal species	LTSM	- NI	- LTSM	- LTSM
Impacts to wetlands	LTSM	- NI	= LTSM	- LTS
<b>Cultural and Tribal Cultural Resources</b>				
Impacts to archaeological resources during construction	LTSM	- NI	- LTSM	= LTSM
Impacts to human remains during construction	LTS	- NI	= LTS	= LTS
Impacts to tribal cultural resources	LTSM	- NI	- LTSM	= LTSM
<b>Energy</b>				
Wasteful or unnecessary energy consumption	LTS	- NI	- LTS	= LTS
Conflict or obstruction of renewable energy or energy efficiency plan	NI	= NI	= NI	= NI
<b>Geology and Soils</b>				
Risk related to seismic ground shaking, soil erosion, liquefaction, unstable soil, and expansive soils	LTS	- NI	= LTS	= LTS
Risk related to fault rupture and landslide	NI	= NI	= NI	= NI
Soil suitability for on-site wastewater disposal	LTS	- NI	= LTS	= LTS
Impacts to Paleontological Resources	LTSM	- NI	- LTSM	= LTSM

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Environmental Issue	Impact Classification			
	Proposed Project	Alternative 1	Alternative 2	Alternative 3
<b>Greenhouse Gas Emission</b>				
Generation of GHG emissions that would have a significant impact on the environment	SU	- NI	- SU	= SU
Conflict with a plan, policy, or regulation adopted for the purpose of reducing GHG emissions	LTS	- NI	- LTS	= LTS
<b>Hazards and Hazardous Materials</b>				
Hazards related to schools, aviation, wildland fire, or interference with emergency response plans	NI	= NI	= NI	= NI
Hazards from transport, use, disposal, upset, or accident of hazardous materials	LTSM	- NI	- LTSM	= LTSM
Hazard to the public or environment from a project located on a hazardous materials site compiled pursuant to Government Code Section 65962.5	LTSM	+ SU	= LTSM	+ LTSM
<b>Hydrology and Water Quality</b>				
Impacts related to impeding or redirecting flood flows, risk of release of pollutants, or conflict with a water quality control plan or sustainable groundwater management plan	NI	= NI	= NI	= NI
Violation of water quality standards or waste discharge requirements or degradation of water quality	LTS	- NI	- LTS	= LTS
Impacts to groundwater supplies or recharge	LTS	- NI	- LTS	= LTS
<b>Land Use and Planning</b>				
Division of an established community	LTS	- NI	= LTS	= LTS
Conflict with a land use plan	LTS	- NI	= LTS	= LTS
Incompatibility or conflict with adjacent land uses	LTS	- NI	- LTS	= LTS

Environmental Issue	Impact Classification			
	Proposed Project	Alternative 1	Alternative 2	Alternative 3
<b>Mineral Resources</b>				
Loss of known or locally-important mineral resources	NI	= NI	= NI	= NI
<b>Noise</b>				
Construction noise impacts	LTS	- NI	- LTS	+ LTSM
Operational on-site noise	LTS	- NI	- LTS	+ LTSM
Operational traffic noise	LTS	- NI	- LTS	+ LTS
Construction vibration impacts	LTS	- NI	- LTS	+ LTS
Airport noise	NI	= NI	= NI	= NI
<b>Population and Housing</b>				
Direct or indirect population growth	LTS	- NI	- LTS	= LTS
Displacement of housing or people	NI	= NI	= NI	= NI
<b>Public Services</b>				
Increased demand for public services and facilities	LTS	- NI	- LTS	= LTS
<b>Recreation</b>				
Impacts to Parks and Recreational Facilities	LTS	- NI	- LTS	= LTS

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Environmental Issue	Impact Classification			
	Proposed Project	Alternative 1	Alternative 2	Alternative 3
<b>Transportation</b>				
Conflict with a program, plan, ordinance or policy addressing the circulation system	LTS	- NI	= LTS	= LTS
VMT Impacts	LTS	- NI	- LTS	= LTS
Impacts related to hazards associated with design features, emergency access, or incompatible use	LTS	- NI	= LTS	= LTS
<b>Utilities and Service Systems</b>				
Impacts related to wastewater treatment capacity	NI	= NI	= NI	= NI
Impacts to water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities and supplies	LTS	- NI	- LTS	= LTS
Solid waste impacts	SU	- NI	- SU	= SU
<b>Public Services</b>				
Wildfire Risk	NI	= NI	= NI	= NI
+ Increased level of impact compared to the proposed project - Reduced level of impact compared to the proposed project = Similar level of impact to the proposed project NI = No Impact LTS = Less than Significant LTSM = Less than Significant with Mitigation SU = Significant and Unavoidable				

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## 7.2 List of Preparers

This EIR was prepared by the County of Santa Barbara, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

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Ryan Russell, Environmental Planner  
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## 8 Responses to Comments

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This section includes responses to comments received during the circulation of the Draft Environmental Impact Report (Draft EIR) prepared for the Arctic Cold Agricultural Processor and Freezer Project.

The Draft EIR was circulated for a 45-day public review period that began on June 22, 2021 and ended on August 13, 2021. In addition, a public hearing was held on Thursday August 5, 2021 at 6:00 p.m. to receive public comments on the Draft EIR.

The County of Santa Barbara received six comment letters on the Draft EIR and one public comment during the public comment hearing. The commenters and the page number on which each commenter's letter appear are listed in Table 8-1.

**Table 8-1 Comment Letters and Public Comments Received**

Letter or Public Comment No. and Commenter		Page No.
<b>Public Hearing Comments</b>		
1	Erik Justesen; RRM Design Group	8-2
<b>Public Comment Letters</b>		
1	Baldev Gill; California Department of Conservation	8-5
2	Lori Schmitz; State Water Resources Control Board	8-9
3	David Swenk; Rural Planning Services	8-12
4	Ingrid McRoberts, California Department of Transportation	8-27
5	Erik Justesen; RRM Design Group	8-46
6	Emily Waddington; Santa Barbara County Air Pollution Control District	8-66
7	Dennis Lammers; Stantec	8-80

The public hearing comments, public comment letters, and responses follow. The comment letters have been numbered sequentially, and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.2, for example, indicates that the response is for the second issue raised in comment Letter 1).

## Public Hearing Comment 1

**COMMENTER:** Erik Justesen; RRM Design Group

**DATE:** August 5, 2021

**Central City Cooling.** The commenter states that they represent Central City Cooling located immediately to the north of the project site across Betteravia Road. The commenter states that they have also submitted a written comment letter regarding the project and Draft EIR. The commenter states that their comments pertain to project site access, circulation, parking, and congestion. The commenter states that the proposed project would negatively impact the operations of other agricultural operators in the area if their comments about the project and Draft EIR are not addressed. The commenter's written comment letter is Letter 5, which is addressed in Response 5.1 through Response 5.21. The commenter's verbal comments during the public hearing comment are responded to in the paragraphs that follow.

**Local Roadway Circulation.** The commenter states that the Draft EIR does not adequately address the potential impact of field trucks and long haul trucks on local roadway system. The transportation analysis in the Draft EIR is included in Section 4.15, *Transportation and Circulation*, and is based on the *Arctic Cold Storage and Packing Project Impact Study* (Arctic Cold TIS) prepared by Associated Transportation Engineers (ATE) and the *Arctic Cold VMT Analysis*, prepared by Fehr & Peers. Both reports are included in Appendix L. The Arctic Cold TIS includes analysis of all anticipated project traffic, including truck traffic. The Arctic Cold TIS provides a breakdown of the trucks that would be generated by the project during both average periods and peak harvest periods in Tables 3A and 3B. Potential impacts of trucks on the local roads and intersections assumed a 2.0 passenger car equivalent (PCE) factor for each truck trip generated by the project. Response 5.9 discusses the project's VMT analysis and how the Draft EIR analysis accounts for project-generated truck trips. The project's access driveways were designed by the ATE-project design team in consultation with County staff in conformity with the County's engineering design standards. Proposed property ingress and egress locations have been designed to accommodate the truck turning movements at the project driveways using the applicable truck turn templates for field trucks and long haul trucks, which are consistent with the anticipated truck traffic activity at the proposed site access locations.

**Betteravia Roadway Capacity.** The commenter states that traffic from the project would exceed the capacity of Betteravia Road. The four-lane segment of Betteravia Road between U.S. 101 and Nicholson Avenue has an adopted Policy Capacity of 30,000 average daily trips/traffic (ADT) and the two-lane segment of Betteravia Road east of Nicholson Avenue has an adopted Policy Capacity of 10,000 ADT. As described in the Arctic Cold TIS, existing and future traffic forecasts for the segments of Betteravia Road with and without the Project are within these County policy capacities. It should be noted that compliance with local roadway capacity standards and local roadway congestion is no longer identified as a physical environmental effect pursuant to the requirements of the California Environmental Quality Act (CEQA), and as a result, concerns related to local roadway volumes and congestion are not discussed in detail in the Draft EIR.

**On-Site Truck Parking.** The commenter states that the Draft EIR does not adequately address parking for long haul vehicles, which the commenter states will use Betteravia to park if they do not have parking on site. The commenter requests the project evaluate on-site parking for long haul vehicles to avoid trucks parking on Betteravia Road. Trucks entering the site would park in the loading docks when they arrive to load the processed fruit and then depart the project site. As a result, neither the project applicant nor County staff have identified the need for short-term or long-term truck parking

on the site. In the unlikely advent that a long haul truck arrives at the site and finds the loading docks full, the truck would be directed to park in the overflow parking area south of the building until a space in the loading dock becomes available. The commenter's recommendation to evaluate on-site parking for long haul vehicles does not identify a deficiency in the Draft EIR environmental analysis; therefore, no changes to the Draft EIR are required. However, the commenter's recommendation will be forwarded to the review authority of the County of Santa Barbara for consideration.

**Site Ingress/Egress.** The commenter states that the two project access points proposed on Betteravia Road do not align with existing access points at the existing Central City Cooling property, which would result in delays and safety impacts. The commenter requests a new analysis using Rosemary Road as the primary access and secondary access aligned with either the existing access points for the Central City Cooling property or Prell Road to the south. The project's access driveways were designed in consultation with County staff and provide the 300-foot minimum spacing offset with the existing Central City Cooling property driveway located on the north side of Betteravia Road in order to minimize turning movement conflicts and conform the County's engineering design standards. The commenter's recommendation to evaluate project site access alternatives does not identify a deficiency in the Draft EIR environmental analysis; therefore, no changes to the Draft EIR are required. However, the commenter's recommendation will be forwarded to the review authority of the County of Santa Barbara for consideration.

**Seasonal Peak Truck Traffic.** The commenter requests the project evaluate seasonal peak traffic from out-of-the-area truck trips. The peak harvest season time period is identified in the Arctic Cold TIS, which shows an ADT of 1,642 including 396 truck trips during the peak harvest season. The transportation analysis in the Draft EIR is included in Section 4.15, *Transportation and Circulation*, and is based on the Arctic Cold TIS prepared by ATE and the *Arctic Cold VMT Analysis*, prepared by Fehr & Peers. Both reports are included in Appendix L.

**Vehicle Miles Traveled.** The commenter states that the analysis of vehicle miles traveled (VMT) in the Draft EIR categorizes the project as an office project and does not consider longer destinations or out-of-area trip origins. The comment requests that the impact of all truck and employee vehicle traffic be analyzed in the Draft EIR. The Draft EIR analysis of the project's potential to generate new VMT is based on the *Arctic Cold VMT Analysis* prepared by Fehr & Peers, which is summarized in Section 4.13, *Transportation and Circulation*, and included in Appendix L. The VMT analysis is based on the County's Environmental Thresholds and Guidelines Manual, which provides the land use categories for project types for use in the VMT analysis (Chapter 18, Table 1). The VMT analysis considers the VMT generated by employees working at the project site. The employment land use category includes manufacturing, wholesaling and distribution, and agricultural uses. Therefore, the project correctly applied the employment land use category to the VMT analysis. Response 5.9 discusses the manner in which the project's truck trips are evaluated in the Draft EIR transportation, air quality, and GHG emissions analyses.

**Electricity.** The commenter states that all agricultural processors will need to provide electric chargers for trucks and other vehicles to comply with emerging State regulations and requirements. The commenter states that the current electrical infrastructure in the project vicinity is inadequate and there are frequent outages. The commenter states that electrical power is going to be a significant financial impact, and requests the project evaluate the inclusion of on-site charging stations for vehicles and trucks and back-up power generation during outages. The project's potential energy and electricity-related environmental impacts are discussed in Section 4.6, *Energy*. Mitigation Measure AQ-1 in Section 4.3, *Air Quality*, includes a requirement that the project applicant provide electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units at all

loading/unloading docks and trailer spaces. The commenter's concerns regarding electrical outages and the potential provision of electric charging stations for vehicles and trucks do not pertain the adequacy of the environmental analysis in the draft EIR, but the commenter's concerns and recommendations will be forwarded to the review authority of the County of Santa Barbara for consideration.



August 11, 2021

**VIA EMAIL**

Ms. Holly Owen  
 County of Santa Barbara  
 624 W. Foster Road Suite C  
 Santa Maria, CA 93455  
[howen@countyofsb.org](mailto:howen@countyofsb.org)

Dear Ms. Owen:

ARCTIC COLD AGRICULTURAL PROCESSOR AND FREEZER PROJECT DRAFT  
 ENIRONMENTAL IMPACT REPORT (EIR), STATE CLEARINGHOUSE NO. 2020100453

The California Geologic Energy Management Division (CalGEM) reviewed the above referenced project, received June 29, 2021. CalGEM previously provided comments on the Notice of Preparation in a letter dated November 18, 2020. These comments included an enclosure that was a comment letter with recommendations sent to Mr. Dan Ringstmeyer on December 20, 2019 regarding preliminary plans for the project. CalGEM's recommendations and comments specified in the November 18, 2020 letter and enclosure (previous comments) are still applicable for this project.

1.1

CalGEM would like to take the opportunity to comment on information presented in the Draft EIR and reiterate certain recommendations pertaining to the three plugged and abandoned oil wells impacted by the project.

1.2

1. Impact HAZ-2 of the Draft EIR mentions the wells being re-abandoned in compliance with current CalGEM standards and not being built over. Please see additional recommendations mentioned in CalGEM's previous comments including maintaining access to the well for future potential well work. As previously mentioned, "Access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Items that can affect well access include, but are not limited to, buildings, housing, fencing, hardscape, landscape, trees, pools, patios, sidewalks, roadways, parking lots, waterways or channels, and decking. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access."

**State of California Natural Resources Agency | Department of Conservation**

Coastal District

Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673

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[conservation.ca.gov](http://conservation.ca.gov)



August 11, 2021

Ms. Holly Owen

2. Figure 2-3 Project Site Plan of the Draft EIR shows the three plugged and abandoned oil wells near structures or features. For example, "Vincent" 21 API 083-02662 is in between a waste-water basin and the building. "Vincent" 22 API 083-02663 and "Vincent" 9 API 083-02661 are near the building footprint. These features and structures have the potential to impede future access to the wells if not properly accounted for. The exact set-back distances of the proposed features and structures from the wells are not clearly shown or discussed in the Draft EIR. As previously recommended, please consider contacting multiple oil well rig companies to determine what would be required for a rig to access these specific wells after development. Ensure approved placement of structures and features allows for adequate rig access and does not in any way impede access to the wells. Consider incorporating set-back dimensions in review documents to ensure future access is maintained during the course of construction. 1.3
  
3. Figure 2-3 Project Site Plan shows APN for each well's American Petroleum Institute (API) well number. To be correct, APN should be replaced with API. 1.4

Thank you for considering CalGEM's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at [CalGEMCoastal@conservation.ca.gov](mailto:CalGEMCoastal@conservation.ca.gov).

Sincerely,



Signature on behalf of Baldev Gill

Baldev Gill,  
Acting Chief Deputy

JM:ji:ks

cc: Jan Perez  
CEQA  
OLRA  
SCH  
Chrono  
CSWR  
Well File

## Letter 1

**COMMENTER:** Baldev Gill; California Department of Conservation

**DATE:** August 3, 2021

### Response 1.1

The commenter notes that the California Geologic Energy Management Division (CalGEM) has reviewed the proposed project, and previously provided comments on the Notice of Preparation for the Draft EIR. The commenter notes that CalGEM's Notice of Preparation (NOP) comments included recommendations regarding preliminary plans for the project. The NOP comments were included and addressed in Section 1, *Introduction*. The commenter's NOP comments related to the preliminary plans for the project, including well locations and soil remediation. These topics are discussed in Section 4.9, *Hazards and Hazardous Materials*, and the commenters NOP comments are summarized in further detail in Response 1.2 through Response 1.4. The commenter does not make recommendations related to the environmental analysis in the EIR. These comments will be reviewed by the County of Santa Barbara as part of the County's standard application review process.

### Response 1.2

The commenter notes that wells would be re-abandoned in compliance with current CalGEM standards and not built over. The commenter notes additional recommendations mentioned in CalGEM's NOP comments including maintaining access to the well for future potential well work. The commenter's NOP comment was included and addressed in Section 1, *Introduction*. As discussed in Section 4.9, *Hazards and Hazardous Materials*, the three petroleum wells within the project site would be re-abandoned to current CalGEM standards and the proposed buildings would not be constructed over the petroleum wells to maintain access. Clearance for access would be provided in compliance with CalGEM requirements. In addition, Mitigation Measure HAZ-3 requires a No Further Action determination for the petroleum wells on the project site prior to issuance of grading permits, which would verify that the project site has been remediated to current regulatory standards.

### Response 1.3

The commenter notes that proposed project features and structures may impede future access to abandoned wells if not properly accounted for. The commenter states that the exact set back distances of the proposed project features and structures are not clearly shown or discussed in the Draft EIR. The commenter recommends the applicant ensure placement of structures and features allows for adequate rig access and does not impede access to wells. As discussed in Section 4.9, *Hazards and Hazardous Materials*, the three on-site petroleum wells would not be built over or their access impeded in compliance with current CalGEM standards. Clearance for access would be provided in compliance with CalGEM requirements. In addition, Mitigation Measure HAZ-3 requires a No Further Action determination which would ensure that the petroleum wells on the project site are re-abandoned in compliance with current CalGEM standards and require written approval from CalGEM. Figure 2-3 was updated in the Final EIR to provide the clearance distances that would be provided for each of the abandoned wells.

### **Response 1.4**

The commenter states that APN should be replaced with American Petroleum Institute (API) well number on Figure 2-3, *Project Site Plan*. Figure 2-3, *Project Site Plan*, in Section 2, *Project Description*, has been updated in the Final EIR.



August 05, 2021

Santa Barbara County  
 Attn: Holly R Owen  
 624 West Foster Road, Suite C  
 Santa Maria, California 93455

SANTA BARBARA COUNTY, NOTICE OF PREPARATION FOR THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE ARTIC COLD AGRICULTURAL PROCESSOR AND FREEZER PROJECT (PROJECT); SCH # 2020100453

Dear Ms. Holly R Owen:

Thank you for the opportunity to review the Project Description (PD) as part of the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and may require a new or amended water supply permit for the above referenced Project. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations title 22, chapter 16 et. seq.).

2.1

The proposed Project will include a new 449,248 square-foot (gross floor area) agricultural processor and freezer facility on a 40-acre project site. The processor will receive produce from local growers, as well as other regions through California and Mexico. Processing will include slicing, dicing, freezing, adding sugar and other ingredients, and making purees and puree concentrates pursuant to client requirements. Once processed, the finished product would be packaged and conveyed to cold storage for blast freezing and storage.

The freezer facility would specialize as a cold distribution warehouse. Products would be received and tracked in a computerized warehouse management system that determines their placement in cold room storage or blast freezers. The products would then be stored and shipped from their storage.

The Project will also include dry storage/warehouse space, administrative offices, shipping and receiving docks, maintenance and mechanical areas, trash and recycling areas, and parking. The Project would drill an on-site well for domestic and irrigation uses. Trucks would mainly come to the site during the May-September harvesting season to deliver the crops to the processor or freezer. Outbound trucks would occur throughout the year and deliver frozen produce to area and regional markets and national and international shipping facilities.

The State Water Board as a responsible agency under CEQA, has the following comments on the County's request for scope and content of the environmental information to include in the draft EIR.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- The PD as part of the NOP indicates that during the non-harvest season (August to May) the Project would require 153 employees and during the harvest season (May to August) the Project would require approximately 623 employees. The PD mentions potable water use when talking about water demand and the need for a new well. And the PD also indicates the Project would include the installation of a new well to service the Project site for the associated demand.
  - Please note: Water Systems that serve at least 25 people per day at least 60 days out of the year is considered a public water system and would require a permit from the State Water Board. The EIR as a result, should include: the plans for the formation of the water system and permitting process, a description of the water system components that will be installed to provide potable water for the workers and any use of potable water in facility processes, information on the construction and operation of the components, and any environmental effects the construction and operation of the system might have. Please update your PD to include all of the Project elements.

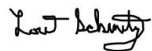
2.2

Once the EIR is ready to be circulated for public review, please ensure that the State Water Board is notified. The State Water Board staff will review the draft EIR and provide additional comments, if necessary.

2.3

Please contact Jeff Densmore at the Santa Barbara District Office, at (805) 566-9021 or [Jeff.Densmore@waterboards.ca.gov](mailto:Jeff.Densmore@waterboards.ca.gov) if you have any questions regarding permitting requirements.

Sincerely,



Lori Schmitz  
Environmental Scientist  
Division of Financial Assistance  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Jeff Densmore  
District Engineer  
Santa Barbara District

## Letter 2

**COMMENTER:** Lori Schmitz; State Water Resources Control Board

**DATE:** August 5, 2021

### Response 2.1

The commenter states their understanding of the proposed project and describes the State Water Resources Control Board (State Water Board) responsibilities and requirements for water supply permits administered under the Safe Drinking Water Act. The commenter states that the State Water Board may require a new or amended water supply permit for the project and should be identified as a responsible agency under CEQA. Section 2, *Project Description*, identifies the State Water Board as a responsible agency related to the issuance of a Domestic Water Supply Permit. No revisions to the Draft EIR are required as a result of these comments.

### Response 2.2

The commenter refers to the project description included in the Notice of Preparation, and notes that a water system that serves at least 25 people per day at least 60 days out of the year is considered a public water system and would require a permit from the State Water Board. The commenter states that the EIR should include plans for formation of the water system and permitting process, a description of the water system components that would be installed to provide potable water, information on the construction and operation of the components, and any environmental effects the construction and operation of the system might have. Section 2, *Project Description*, states the proposed project would require a Domestic Water Supply Permit from the State Water Board. Section 2, *Project Description*, and Section 4.14, *Utilities and Service Systems*, state the project would include installation of a new well which would serve potable water to the agricultural processor and freezer facility. The Draft EIR analyzed the impacts of construction and operation of the proposed facility and included required mitigation to ensure potential environmental effects would be below the applicable County of Santa Barbara thresholds of significance. The proposed well and potable water system would be within the project's proposed development footprint and was included in the analysis.

### Response 2.3

The commenter requests that the lead agency ensure the State Water Board is notified regarding the availability of the Draft EIR. The County of Santa Barbara responded directly to the State Water Board letter during the 45-day public review period notifying the State Water Board that the Draft EIR is available for review and comment. The State Water Board responded to this notification confirming their understanding of the Draft EIR availability but did not provide further comment on the Draft EIR.



August 12, 2021

Holly Owen, Supervising Planner  
 Planning & Development Department  
 County of Santa Barbara  
 624 W. Foster Road  
 Santa Maria, CA 93455

**RE: Comment Letter  
 Arctic Cold Environmental Impact Report  
 20DVP-00003, 20CUP-00005**

Dear Ms. Owen

Thank you for the opportunity to comment on the Environmental Impact Report for the Arctic Cold Project. We commend the County on the thorough analysis for the project which effectively analyzed the potential environmental impacts. We have reviewed the document and are pleased to provide the following comments. 3.1

1. **Impact AG-1.** The DEIR discloses approximately 40 acres of prime farmland. It should be noted of those 40 acres only 19 acres are classified as prime soils. Though there is some acreage of soils are prime, the proposed use is supportive of the intensification of agriculture and the subsequent processing operations allow for the greater intensification of prime soils in the region. The proposed project provides a multiplier effect on expanded agriculture on prime soils accommodating increased yield processing potential. 3.1
2. **Section 4.3 Air Quality.** For comments on Air Quality see attached letter prepared by LSA and Associates dated August 2, 2021. 3.2
3. **Section 4.4 Biological Resources.** On Page 4.4-4 in the Drainage discussion, the description erroneously characterizes the drainage ditch parallel to Betteravia Road as “an irrigation drainage that supplies irrigated water to agricultural crops”. The drainage is not part of the supply system but is used for conveying regional runoff from broadcast agricultural spraying and from Betteravia Road and Rosemary Road to minimize erosion. The channel is regional and is used by multiple landowners fronting Betteravia Road. 3.3
4. **Impact BIO-1 and MM Bio-1. California Red Legged Frog.** It should be noted the degraded nature of the site. Considering the functional use of the feature is to intercept road and agricultural runoff, it is typically accompanied by associated pollutants and chemicals The potential for presence would be considered low. The applicant had introduced the project to the USWFS and no concerns were exhibited by their staff for CRLF or CTS mainly due to the historic use of intensive row crop agriculture for over 60 years. The mitigation and discussion should call out the mitigation is limited to work impacting the channel, the other elements of the project, such as building, road improvements etc, are not associated with these impacts. In reference to the mitigation, we are supportive of conducting a pre-construction survey along with the other species. The other elements of the mitigation involve what would happen should a specimen be found but they do not explicitly call for it. An example is the workshop for 3.4

employees. It is inappropriate for the county to identify mitigation measures to minimize impact for state and federal species, that is the purview of the USFWS for CRLF only. If a specimen is found, the mitigation should be limited to ceasing operations and requirement to consult with the USFWS.

3.4  
cont'd

5. **Impact BIO-2 and Mitigation Measure BIO-4.** The EIR concludes there is a potential impact of @ 2,000 sf of the drainage channel that is located along Betteravia Road due to the crossings that need to be constructed to access the site. At this time it is not determined if the channel would fall under RWQCB or CADFW jurisdiction. It certainly does not fall under any federal jurisdiction so there is no Sections 404/401 Clean Water Act applicability. The amount of disturbance is *de minimus* as to size and the EIR does not cite the regulatory nexus that would document such a small amount of disturbance necessitating jurisdictional review. The actual linear feet of disturbance is actually less than 150 feet, it is 125 feet which in federal review is below the threshold level for any permitting. The impact assessment also discounts the existing quality of the habitat that exists. The flows that are conveyed into the channel have pollutants and chemicals inherent from road runoff and the existing agricultural operations. An argument could be made ambient water quality could be marginally improved by the removal of acreage from production.

3.5

It should be noted the impact discussion and Figure 4.4-2 the foot bridge is described. That feature was taken out of the project design, no longer exists, and the report should be revised accordingly. Impact calculations should be revised which will decrease slightly. MM BIO-4 prematurely assumes RWQCB/CADFW jurisdictional authority and predetermines mitigation that is within their jurisdiction to decide. Of concern to the mitigation is the miniscule amounts described, how that can be effectively done, and where and to what benefit. We recommend changing the mitigation to require consultation with the agencies and to provide evidence of concurrence prior to the construction of the crossings.

3.6

The requirement for an HMMP is entirely unnecessary and no nexus is provided to require one. The EIR, in its pursuit for protection of biological resources even albeit a *de minimus* one, forgets the primary function of the channel and that is to convey road runoff and agricultural irrigation. It is certainly not pristine habitat and never will be. The operation will not change and ALL drainage ditches on site will continue to operate as such so creating functional habitat on site is impossible. The impracticalities of pursuing off site mitigation for such a small area would be challenging. By making such a mitigation we would be forced to attempt regardless if state agencies required it or not and this issue is their prerogative not the County.

3.7

6. **MM CUL-1.** The condition that is provided in the EIR is substantially different than the County's standard condition language for unanticipated discovery that was approved by the Board of Supervisors. For efficiency we recommend just utilizing the standard language. The mitigation has the appearance of requiring additional steps assuming resources are out there even though none are expected in these historic farm fields that were previously an active oil field. The impact is a Class II impact and the standard condition sufficiently mitigates to less than significant.

3.8

7. **Impact GEO-2.** The EIR incorrectly states 14,565 cy net soil cut to be exported and disposed of off-site. Due to compaction, the site would be balanced. No export offsite is proposed for the project.

3.9

8. **Section 4.8 Greenhouse Gas Emissions.** For comments on Greenhouse Gas Emissions, see attached letter prepared by LSA and Associates dated August 2, 2021.

3.10



9. **Section 4.13 Transportation. Page 2.9, 2.5.3 Circulation.** The truck ADT numbers presented in this paragraph for both non-harvest and harvest seasons do not match the data presented in the ATE report. 3.11
10. **Page 4.13-4, Impact T-1.** The last paragraph states that the project would widen Betteravia Road “to provide a separate right-turn lane to accommodate traffic accessing the project site”. This should be modified to state that the project would widen Betteravia Road “to provide a separate right-turn lane **and a center left-turn lane** to accommodate traffic accessing the project site”. 3.12
11. **Page 4.13-6, Impact T-3.** The text for this impact states that the project would widen Betteravia Road “to provide a separate right-turn lane at both driveways, improving emergency access along this route.” This should be modified to state that the project would widen Betteravia Road to provide a separate right-turn lane **and a center left-turn lane** at both driveways, improving emergency access along this route.” 3.13
12. **Alternative 2.** Alternative 2 assumes a 25% less capacity project as the environmentally superior alternative. It assumes a uniform reduction in square footages of the various operational areas but the levels of significance for impacts do not change which is a fundamental criteria for determination of the environmentally superior alternative, Air Quality, GHG and Solid Waste remain significant impacts so nothing is gained. Since the 25% reduced option does not minimize the impacts to any significant extent, the proposed project would be of the same environmental consideration as Alternative 2. Forcing a reduced scale does not remedy the demand for this use but would just force smaller facilities to be built elsewhere possibly leading to greater impacts cumulatively. 3.14

The Santa Maria Valley is gaining the reputation of a regional agricultural area both national and internationally known. National and International Companies such as Arctic Cold are attracted here due to the unique nature of our farmlands and the regional support that exists. The function of this facility is to make our products available worldwide and the scale of the project is necessary for that objective.

The function and size requirements for the structure is directly based on need, tenant requirements, and future processing contracts, and FDA requirements regarding storage processing. The proposed project is specifically sized to meet the owner’s requirement on product storage and processing operations. The decision to go with this size of building is directly related to quantity of storage and the economics to meet the demand of processing product in the area. Furthermore, the building size allows for more product to be stored at the peak of season to control the out bound deliveries of the product. Any reduction in size has the potential to make the project financially and operationally infeasible.

We appreciate the opportunity to comment on this document. We look forward to working with the County to bring this important project to the Santa Maria Valley.

Sincerely,



David Swenk, Principal Planner  
Encl: LSA Memorandum Dated August 2, 2021

## MEMORANDUM

**DATE:** August 2, 2021

**To:** Clayton Dragoo, Senior Project Engineer, Fisher Construction Group, Inc.

**FROM:** Amy Fischer, Principal  
Cara Carlucci, Senior Planner

**SUBJECT:** Peer Review of the Arctic Cold Storage and Packaging Project Air Quality Section of the Draft EIR

LSA has conducted a peer review of the Arctic Cold Storage and Packaging Project Air Quality Section of the Draft Environmental Impact Report (EIR). This memorandum provides a project description and discusses the findings outlined in the Draft EIR.

### INTRODUCTION

This memorandum evaluates the Draft EIR's consistency with the Santa Barbara County Air Pollution Control District (SBCAPCD) Environmental Review Guidelines and the County of Santa Barbara Environmental Thresholds and Guidelines Manual. This memorandum also includes a review of the analysis to determine if the analysis accurately reflects the proposed project.

### ENVIRONMENTAL SETTING

LSA reviewed the Environmental Setting discussion, including climate and topography, air pollutants of primary concern, current air quality, and sensitive receptors. LSA agrees with the information included in the Draft EIR.

### REGULATORY SETTING

LSA reviewed the federal, State, and local regulations identified in the Draft EIR and agrees with the identified regulations.

### IMPACT ANALYSIS

#### Methodology

The general methodology for evaluating air quality impacts in the Draft EIR appears to have followed the Air Quality Analysis and Greenhouse Gas Analysis Memorandum for the proposed Arctic Cold Storage and Packaging Project, which was prepared by LSA. The Air Quality Analysis and Greenhouse Gas Analysis Memorandum was prepared using methods and assumptions recommended in the County of Santa Barbara Environmental Thresholds and Guidelines Manual and peer reviewed by SBCAPCD and Rincon Consultants. As such, LSA concurs with the methodology identified in the Draft EIR.

In addition, the Draft EIR determined that the project would not include any land uses known to produce odors; and found that the project would not result in odor impacts. LSA agrees with this finding and odors are not discussed further.

### **Conflict with or Obstruct Implementation of the Applicable Air Quality Plan**

As described in the Draft EIR, the applicable clean air plan is the SBCAPCD 2019 Ozone Plan. To be consistent with the 2019 Ozone Plan, a project's direct and indirect emissions must be accounted for in the growth assumptions of the Ozone Plan and the project must be consistent with the policies in the Ozone Plan. The Draft EIR found that the project would provide a new cold storage/processing facility and would thereby support existing agricultural production in the area by providing support infrastructure. In addition, the project is consistent with the existing zoning, AG-II (Agricultural II). Therefore, the Draft EIR found that the project would be within growth forecast assumptions used in the 2019 Ozone Plan and would not conflict with or obstruct the implementation of the applicable air quality plan. Impacts were determined to be less than significant without mitigation. LSA concurs with this assessment. The project would not conflict with or obstruct implementation of the applicable air quality plan.

### **Construction-Period Emissions**

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by site preparation, grading, hauling, and building activities. The analysis presented in the Draft EIR is consistent with the analysis contained in the Air Quality Analysis and Greenhouse Gas Analysis Memorandum. The analysis relied on the California Emissions Estimator Model (CalEEMod) to assess project impacts and the annual emissions of CO, NO<sub>x</sub>, ROC, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> associated with project construction are shown in Table 4.3-3 of the Draft EIR. The Draft EIR determined that construction emissions would not exceed the applicable Santa Barbara County significance thresholds.

The Air Quality Analysis and Greenhouse Gas Analysis Memorandum identified Mitigation Measure AQ-1 to require the implementation of the SBCAPCD's standard dust control and equipment exhaust measures. The Draft EIR did not identify these standard measures as mitigation; however, the Draft EIR states that the project contractor would be required to implement the standard measures for reducing fugitive dust emissions (PM<sub>10</sub> and PM<sub>2.5</sub>) and particulate emissions from diesel exhaust, which are required for all projects that would involve earth-moving activities. The Draft EIR found that impacts would be less than significant with implementation of the SBCAPCD's standard measures for reducing fugitive dust emissions and particulate emissions from diesel exhaust. LSA concurs with this assessment of construction period emissions, and agrees that with implementation of the SBCAPCD's standard measures, impacts would be less than significant.

### **Operational Emissions**

As discussed in the Draft EIR, project-related long-term air emissions would occur primarily from vehicle trips associated with the project (i.e., mobile source emissions) and boiler emissions. The project would use refrigerated trucks from other regions throughout California and Baja. Project-related long-term air emissions would also occur from the use of electricity and natural gas (i.e., energy source emissions), the use of landscape equipment and from the use of consumer products

(i.e., area source emissions), the use of the forklifts (off-road emissions), the use of the fire pump system (i.e., stationary source emissions) and the use of the boilers.

The analysis presented in the Draft EIR is consistent with the analysis contained in the Air Quality Analysis and Greenhouse Gas Analysis Memorandum, which relied on CalEEMod to assess project impacts. Table 4.3-4 of the Draft EIR identifies the annual emissions of CO, NO<sub>x</sub>, ROC, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions associated with operation of the proposed project. As identified in the Draft EIR and consistent with the Air Quality Analysis and Greenhouse Gas Analysis Memorandum, mobile source NO<sub>x</sub> emissions and total ROC and NO<sub>x</sub> emissions would exceed the applicable Santa Barbara County thresholds.

The Draft EIR identified Mitigation Measure AQ-1 to reduce mobile source NO<sub>x</sub> emissions to the extent feasible by providing infrastructure necessary to support zero-emission vehicles and equipment. Mitigation Measure AQ-1 identified in the Draft EIR is generally consistent with Mitigation Measure AQ-2 identified in the Air Quality Analysis and Greenhouse Gas Analysis Memorandum; however, the Draft EIR did not include the following emission reductions measures that had been recommended for inclusion by previous comments on the project by the SBCAPCD:

- The Project Applicant shall be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,<sup>1</sup> Periodic Smoke Inspection Program (PSIP),<sup>2</sup> and the Statewide Truck and Bus Regulation.<sup>3</sup>
- Trucks and support equipment shall be prohibited from idling longer than five minutes while on site.
- Where feasible, install vegetative walls<sup>4</sup> or other effective barriers that separate loading docks and people living or working nearby.

However, the Draft EIR determined that since the project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to

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<sup>1</sup> In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: <https://www.arb.ca.gov/cc/hdghg/hdghg.htm>.

<sup>2</sup> The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: <https://www.arb.ca.gov/enf/hdvp/hdvp.htm>.

<sup>3</sup> The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

<sup>4</sup> Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf>.

require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies, the project could not feasibly reduce the project's NO<sub>x</sub> emissions below thresholds. As a result, the Draft EIR found the potential impact of the project's operational emissions of NO<sub>x</sub> would be significant and unavoidable. LSA concurs with this assessment of operational emissions, and agrees that impacts would be significant and unavoidable.

## **Expose Sensitive Receptors to Substantial Pollutant Concentrations**

### *Construction*

The analysis presented in the Draft EIR is consistent with the analysis in the Air Quality Analysis and Greenhouse Gas Analysis Memorandum. As discussed in the Draft EIR, construction activities associated with the project would generate airborne particulates and fugitive dust, as well as a small quantity of pollutants associated with the use of construction equipment (e.g., diesel-fueled vehicles and equipment; however, construction contractors would be required to implement standard measures for reducing fugitive dust emissions. The Draft EIR found that with implementation of the SBCAPCD standard dust control and equipment exhaust measures, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant. LSA concurs with this assessment of construction period health risk impacts, and agrees that with implementation of the SBCAPCD's standard measures, impacts would be less than significant.

### *Operational*

The analysis presented in the Draft EIR is consistent with the analysis in the Air Quality Analysis and Greenhouse Gas Analysis Memorandum. The analysis included an equipment-specific screening-level health risk assessment (HRA) using the SBCAPCD's screening tool spreadsheet for diesel-fired internal combustion engines (DICE) to evaluate the potential of the project's diesel fire pump to emit toxic and hazardous air pollutants. Based on Table 4.3-5 in the Draft EIR, health risks would not exceed SBCAPCD's thresholds. LSA concurs with this assessment.

In addition, as discussed in the Draft EIR, the project's role as a shipping facility would increase heavy truck traffic in the immediate project vicinity and along regional hauling routes. Project trucks would operate in two modes: stationary idling and moving on and off the site. Consistent with the Air Quality Analysis and Greenhouse Gas Analysis Memorandum, the Draft EIR found that emissions from trucks while idling result in a higher concentration of TACs compared to the emissions from moving trucks. Therefore, the Draft EIR found that due to the location of the nearest sensitive receptors and based on the truck distribution percentage and estimated origin and designation, diesel exhaust associated with moving trucks at any one receptor location would occur for a limited duration. As such, the proposed project is not expected to be a source of substantial emissions. LSA concurs with this assessment and agrees that impacts would be less than significant.

## **Cumulative Impacts**

As discussed in the Draft EIR, based on Santa Barbara County thresholds, a project would have a significant cumulative impact if it is inconsistent with applicable air quality plans. The Draft EIR found that although the project is consistent with the 2019 Ozone Plan, project operational emissions would result in a cumulatively considerable increase of criteria pollutants due to high NO<sub>x</sub>

emissions. Therefore, the Draft EIR found that the project would result in a significant and unavoidable impact and would result in a cumulatively considerable contribution to air quality impacts. LSA concurs with this finding.

## **CONCLUSION**

As described above, LSA conducted a peer review of the Draft EIR to verify the Draft EIR conclusions. LSA concurs with the analysis and findings contained in the Draft EIR and agrees with the conclusion that the project would result in less-than-significant impacts related to consistency with the applicable air quality plan, construction-period emissions, health risk impacts, and odors. LSA also concurs with the conclusion that project operation would result in a significant and unavoidable air quality related to operational NO<sub>x</sub> emissions.

## Letter 3

**COMMENTER:** David Swenk; Rural Planning Services

**DATE:** August 12, 2021

### Response 3.1

The commenter states the Draft EIR discloses the site contains 40 acres of prime farmland and states it should note that 19 of the 40 acres of prime farmland are classified as prime agricultural soils. The commenter also states the Draft EIR should mention the proposed project would promote agriculture use in the region as it would allow increase yield potential. Section 4.2, *Agricultural Resources*, of the Draft EIR states the project site has 40 acres of Prime Farmland and Unique Farmland and approximately 27 acres of Class III soils and 13 acres of Class I soils. In addition, Section 4.2, *Agricultural Resources*, states the proposed new processor and freezer facility is intended to support agricultural use for ongoing agricultural operations on the subject property and in the project site vicinity and that impacts to Prime Farmland would be less than significant.

### Response 3.2

The commenter refers to comments prepared by LSA and Associates (LSA) on the EIR air quality analysis. LSA's comments are appended to Letter 3 and describe LSA's peer review of the Draft EIR to verify the Draft EIR conclusions, which were based in part on an Air Quality and Greenhouse Gas Emissions Analysis Memorandum prepared by LSA (included as Appendix C to the Draft EIR). LSA states that they concur with the analysis and findings contained in the Draft EIR and agree with the conclusion that the project would result in less-than-significant impacts related to consistency with the applicable air quality plan, construction-period emissions, health risk impacts, and odors. LSA states that they also concur with the conclusion that project operation would result in a significant and unavoidable air quality impact related to operational NO<sub>x</sub> emissions. No revisions to the air quality analysis in the Draft EIR are required as a result of these comments. Further detail is provided in the responses to Letter 6, below, which was received from the Santa Barbara Air Pollution Control District and includes further comments on the Draft EIR evaluations of air quality and GHG emissions.

### Response 3.3

The commenter states that the Draft EIR discussion of drainage incorrectly characterizes the drainage channel parallel to Betteravia Road as "an irrigation drainage system that supplies irrigated water to agricultural crops." The commenter states that the drainage channel is used for conveying regional runoff to minimize erosion and is used by multiple landowners fronting Betteravia Road. The characterization of the irrigation drainage was revised in Section 4.4.1(b), *Drainages and Wetlands*, as follows:

#### Drainages

No aquatic features are depicted on the *National Wetlands Inventory* (NWI; U.S. Fish and Wildlife Service [USFWS] 2020a) or *National Hydrography Dataset* (NHD; U.S. Geological Survey [USGS] 2020d) within the BSA. One irrigation drainage that supplies irrigation water to agriculture crops conveys irrigation runoff from adjacent agriculture fields was observed within the BSA along the eastern and northern perimeters of the project site (Appendix D). Based on review of aerial images (Google Earth 2020), this drainage is part of the regional irrigation system that does not

have direct connectivity to any navigable waters, such as the Santa Maria River (located 2.3 miles east of the project) and the Pacific Ocean. The trapezoidal shaped irrigation drainage was excavated in uplands, wholly drains uplands, and is continually maintained.

### **Response 3.4**

The commenter states that the potential for presence of California red-legged frog (CRLF) in the drainage channel parallel to Betteravia Road should be considered low, because of the degraded nature of the site and the use of the drainage channel for conveying road and agricultural runoff that is associated with pollutants. The commenter notes that the United States Fish and Wildlife Service (USFWS) has not conveyed concerns regarding CRLF or California tiger salamander (CTS) at this location. The commenter recommends that the mitigation for these species be limited to work impacting the channel, as the other elements of the project are not associated with impacts to these species. The commenter states that they support pre-construction surveys. However, the commenter states that it is inappropriate for the County to identify mitigation to minimize impacts for state- and federally-listed species, which is the purview of USFWS and California Department of Fish and Wildlife (CDFW). The commenter states that if an individual of a state- or federally-listed species is found, mitigation should be limited to ceasing operations and requirement to consult with the appropriate federal or state agency.

The Draft EIR analysis described in Section 4.4, *Biological Resources*, is based on a desktop survey of special status plant species occurring in the vicinity of the project site and special status animal species occurring in the regional vicinity of the project site (Draft EIR Appendix E). The Draft EIR concluded there is low potential for CRLF to occur transiently within the project site and surrounding area during conditions suitable for amphibian terrestrial dispersal movement, such as during wet conditions during or following rain events or at night as it travels between suitable aquatic breeding sites, which could lead to incidental occurrence in the project footprint. While eggs and tadpoles would not be impacted by work outside the channel, dispersing and foraging adults and sub-adults could occur outside the drainage channels in the upland areas. Mitigation Measure BIO-1 requires pre-construction surveys for CRLF. If a CRLF is found within the project footprint, consultation with and authorization from USFWS would be required prior to construction because CRLF is federally-threatened. Consultation with CDFW would not be required because CRLF is not listed as State threatened or endangered. Additionally, USFWS would specify any applicable measures required to reduce impacts to CRLF as part of the Biological Opinion/Incidental Take Statement (BO/ITS) or Habitat Conservation Plan/Incidental Take Permit (HCP/ITP). The requirements described in Mitigation Measure BIO-1 also include stopping work if an individual CRLF is found and standard measures that would be required until the USFWS provides authorization to resume work, consistent with USFWS requirements. Mitigation Measure BIO-1 provides leeway in the case that the applicant has acquired USFWS permits beforehand, in which case consultation would not be necessary and the applicant would follow the specific steps outlined in the permit. Therefore, the measures included in Mitigation Measure BIO-1 are necessary to reduce potential impacts to CRLF. Mitigation Measure BIO-1 also requires that all work shall stop, and the USFWS be notified if CRLF is identified during project construction activities. No revisions to the biological resources analysis in the Draft EIR are required as a result of this comment.



### Response 3.5

The commenter notes the Draft EIR mitigation requirements to reduce potential impacts to biological resources associated with access crossings of the drainage channel parallel to Betteravia Road. The commenter states that it has not been determined if the drainage channel would fall under Regional Water Quality Control Board (RWQCB) or CDFW jurisdiction, and that there is no Section 404/401 Clean Water Act (CWA) applicability. The commenter states that the amount of disturbance is *de minimis*, and states that the Draft EIR does not cite the regulatory nexus that would document the need for jurisdictional review of such a small amount of disturbance. The commenter states that the linear feet of disturbance is less than 150 feet, and that the threshold for any level of permitting requiring federal review is 125 feet. The commenter states that the impact assessment also discounts the existing quality of the habitat, which is currently impacted by pollutants from road runoff and existing agricultural operations. The commenter states that removing acreage from production may marginally improve water quality.

Section 4.4, *Biological Resources*, confirms that the drainage channel is not within the jurisdiction of the U.S Army corps of Engineers and the project is not subject to Federal review under Section 404/401. However, as described in Section 4.4, *Biological Resources*, the project would potentially be subject to RWQCB and CDFW jurisdiction. Section 4.4, *Biological Resources*, states that the drainage channel contains an ordinary high water mark (OHWM) and surface water; therefore, it may be regulated by the RWQCB under the Porter-Cologne Water Quality Control Act. In addition, Section 4.4, *Biological Resources*, states the drainage channel was mapped as a potential CDFW jurisdictional streambed (Draft EIR Appendix D) pursuant to CFGC Section 1600 et seq. The Draft EIR also considered the habitat quality and states in Mitigation Measure BIO-4, “Due to the highly disturbed nature of the habitat within the artificial irrigation drainage, project impacts to the irrigation drainage shall be mitigated at a minimum ratio of 1.0:0.5.” The project would have potential impacts to water quality during construction and operational activities with the removal of agricultural production, as discussed in Section 4.10, *Hydrology and Water Quality*.

### Response 3.6

The commenter states that the Draft EIR impact discussion and Figure 4.4-2 describe a foot bridge which has been removed from the project design. The commenter recommends the report be revised and impact calculations revised accordingly. The commenter states that Mitigation Measure BIO-4 prematurely assumes RWQCB/CDFW jurisdictional authority and predetermines mitigation that is within the jurisdiction of those agencies to decide. The commenter states concerns regarding the miniscule amounts of mitigation, how it can be effectively implemented, and the benefit of such mitigation. The commenter recommends changing the mitigation measure to require consultation with the applicable resource agencies and providing evidence of concurrence prior to the construction of the proposed drainage channel crossings.

The irrigation drainage impact analysis and Figure 4.4-2 is consistent with the project site plan shown in Figure 2-3 in Section 2, *Project Description*. Section 4.4, *Biological Resources*, identifies the project as potentially under the jurisdiction of the RWQCB and CDFW but does not preemptively state consultation is required. Since agency jurisdiction is not currently known (as described in Response 3.5), the Draft EIR accounts for potential impacts in Mitigation Measure BIO-4, which uses minimum standards consistent with RWQCB and CDFW requirements. No revisions to the biological resources analysis in the Draft EIR are required as a result of this comment.

### Response 3.7

The commenter states that there is no nexus to require a Habitat Mitigation and Monitoring Plan (HMMP), and the requirement is unnecessary. The commenter states that the Draft EIR does not acknowledge the primary purpose of the channel, which is to convey road runoff and agricultural irrigation, and that the channel is not pristine habitat. The commenter states that the operation of the channel would not change as a result of the project. The commenter states that creating functional habitat on the site is impossible and pursuing off-site mitigation for such a small area would be challenging. The commenter states that such requirements are the prerogative of State agencies, not the County.

The Draft EIR states the channel is for drainage that is part of the regional irrigation system that does not have direct connectivity to any navigable waters, such as the Santa Maria River. The descriptions of the features and habitat quality of the drainage are based on the findings of a Jurisdictional Delineation Survey prepared by Rincon Consultants, Inc. in October 2020, which found the drainage channel contains a streambed and banks with wetland plants that could support wildlife and provides moderate wildlife habitat throughout the year. A HMMP is separate from any permitting and sets the minimum standards for how compensatory mitigation shall be carried out and the required success criteria to deem the compensatory mitigation satisfied. The County has the prerogative to require a HMMP where compensatory mitigation is identified as a requirement. No revisions to the biological resources analysis in the Draft EIR or Mitigation Measure BIO-4 are required as a result of this comment.

### Response 3.8

The commenter states that the conditions described in the Draft EIR are different than the County's standard condition language for unanticipated discovery that was approved by the Board of Supervisors. The commenter states that the mitigation has the appearance of requiring additional steps assuming resources are found although none are expected and recommends utilizing the County's standard language as mitigation. The cultural resources analysis, which is based on a *Phase I Cultural Resources Study* prepared by LSA, determined there is potential for unanticipated discoveries of cultural resources during project ground disturbance as only 25 percent of the project site was surveyed. The County's standard condition language for unanticipated discovery includes a "stop work at encounter" measure which is similar to the measure recommended in the *Phase I Cultural Resources Study* prepared by LSA. The *Phase I Cultural Resources Study* prepared by LSA also recommended a Worker Education Program (WEP) to supplement the County's standard condition language, ensuring that the "stop work at encounter" measure is effectively implemented in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. To maximize consistency with the County's standard condition language, the wording of Mitigation Measure CUL-1 has been revised as follows:

#### *CUL-1 Unanticipated Discovery of Historical or Archaeological Resources*

Prior to construction, the Construction Contractor shall ensure that a County-qualified archaeologist and a local tribal representative funded by the applicant shall be involved in the design and implementation of a Worker Education Program (WEP) for all project construction supervisors and field personnel who may encounter unknown cultural resources during earthmoving activities. ~~In the event historical or archaeological resources are unexpectedly encountered during ground-disturbing construction activities, the Construction Contractor shall halt work within 50 feet of the find. The Applicant shall immediately notify the County of Santa~~

~~Barbara Planning & Development Staff and retain a County approved archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to evaluate the discovery. If the discovery is prehistoric, then the County approved archaeologist shall contact a local tribal representative to participate in the evaluation of the discovery. If necessary, the evaluation shall include preparation of a treatment plan and archaeological testing for California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources. Work shall not resume until authorization is received from County Planning & Development Staff.~~

The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant.

### Response 3.9

The commenter states that the Draft EIR incorrectly states 14,565 cubic yards (CY) of soil would be exported and disposed of off-site. The commenter states that due to compaction, soil would be balanced on the project site, and no export off-site is proposed. As discussed in Section 2, *Project Description*, the project would require approximately 64,876 cubic yards (cy) of soil cut and 50,311 cy of soil fill, balancing out to approximately 14,565 cy net soil cut. Due to compaction the project may result in less soil export than assumed in the Draft EIR analysis. In the event that soil compaction does not eliminate the need for soil export, the Draft EIR provides a conservative analysis of the amount of soil export that may be required.

The impact discussion in GEO-2 is consistent with Section 2, *Project Description*, as well as related analytical assumptions included in Section 4.3, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*. Throughout the Draft EIR the analysis and findings would remain the same as grading activity would still result in temporary exposure of ground surfaces throughout the project site, requiring implementation of stormwater retention/infiltration infrastructure and compliance with existing regulations to reduce soil erosion impacts and standard SBCAPCD dust control measures per SBCAPCD's Rule 345 to reduce potential particular matter emissions from the project site during construction.

### Response 3.10

The commenter refers to comments prepared by LSA on the EIR greenhouse gas (GHG) emissions analysis. LSA's comments are appended to Letter 3 and describe LSA's peer review of the Draft EIR to verify the Draft EIR conclusions, which were based in part on an Air Quality and Greenhouse Gas Emissions Analysis Memorandum prepared by LSA. LSA states that they concur with the analysis and findings contained in the Draft EIR. No revisions to the GHG emissions analysis in the Draft EIR are required as a result of these comments. Further detail is provided in the responses to Letter 6, below, which was received from the Santa Barbara Air Pollution Control District and includes further comments on the Draft EIR evaluations of air quality and GHG emissions.

### **Response 3.11**

The commenter states that the truck ADT estimates presented in the Draft EIR for both non-harvest and harvest seasons do not match the data presented in the *Arctic Cold Storage and Packing Project Impact Study* (Arctic Cold TIS) prepared by ATE. The ADT numbers presented in the Draft EIR have been updated consistent with revisions made to the Arctic Cold TIS (ATE, July 21, 2020). The revised Arctic Cold TIS forecasted project-generated ADT of 1,642 including 396 truck trips during the peak harvest season. The revision of these ADT forecasts did not result in any change in the environmental conclusions in the Draft EIR. Response 6.3 includes a discussion and specific revisions that were made in Section 4.3, *Air Quality*, to reflect the project's potential operational air quality impacts based on the ADT values referenced by the commenter.

With regard to the analysis of the project's potential transportation impacts, pursuant to SB 743, VMT is now the metric used for measuring environmental impacts. The Draft EIR analysis used daily trip used the daily VMT numbers consistent with the Arctic Cold VMT Analysis and Technical Memorandum prepared by Fehr & Peers (Appendix L). The Technical Memorandum used the Santa Barbara County Association of Governments' (SBCAG) Regional Travel Demand Model (RTDM) to reflect anticipated non-harvest and harvest employment levels, which determined there would be 153 during non-harvest and 623 employees during harvest season. The Arctic Cold VMT Analysis and the Draft EIR used 623 employees in the VMT analysis to account for peak employment activity.

### **Response 3.12**

The commenter states that the last paragraph of Impact T-1 should be modified to state that the project would widen Betteravia Road "to provide a separate right-turn lane and a center left-turn lane to accommodate traffic accessing the project site." Impact T-1 in Section 4.13, *Transportation*, states that the project proposed frontage improvements on Betteravia Road includes the addition of two driveways to access the project site and the widening of the road to provide a separate right turn lane to accommodate traffic accessing the project site. No revisions to the transportation analysis in the Draft EIR are required as a result of these comments

### **Response 3.13**

The commenter states that Impact T-3 should be modified to state that the project would widen Betteravia Road "to provide a separate right-turn land and a center left turn lane at both driveways, improving emergency access along this route." Impact T-3 in Section 4.13, *Transportation*, states that the project's frontage improvements would include widening Betteravia Road to provide a separate right-turn lane at both of the driveways, improving emergency access along this route. No revisions to the transportation analysis in the Draft EIR are required as a result of these comments.

### **Response 3.14**

The commenter notes that the Draft EIR concludes that Alternative 2, the 25 Percent Reduced Alternative, would be the environmentally superior alternative, but would not minimize impacts to a significant extent as it would not eliminate the project's significant but unavoidable impacts associated with air quality, GHG emissions, or solid waste. The commenter states that the 25 Percent Reduced Alternative does not reduce significant impacts and would limit the function of the proposed facility due to the reduction on operational capacity, which may result in demand for smaller facilities elsewhere that could increase regional cumulative impacts. The commenter describes the agricultural and economic benefits of the project to the region, and states that the proposed project has been

sized to meet tenant requirements, future processing contracts, and FDA requirements regarding storage processing. The commenter states that the building size allows for more product to be stored at the peak of season to control the out bound deliveries of the product, and that any reduction in the project' size would make the project financially and operationally infeasible.

As discussed in Section 6, *Alternatives*, the Draft EIR concludes Alternative 2 would reduce impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, hazardous and hazardous materials, hydrology and water quality, land uses, noise and vibration, population and housing, public services, parks and recreational facilities, transportation, and utilities and service systems, but it would not reduce the project's significant solid waste, air quality, and GHG impacts below the applicable thresholds of significance. The Draft EIR cumulative impact analysis discussed the potential cumulative environmental impacts resulting from the project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project area, which are described in Section 3, *Environmental Setting*. The Draft EIR also states that Alternative 2 would meet all four primary objectives to a lesser extent than the proposed project because of the reduced size of the agricultural processing and freezer facility. The commenter does not point out a deficiency related to the environmental analysis in the Draft EIR alternatives analysis. The comment will be forwarded to the review authority of the County of Santa Barbara for consideration.

**DEPARTMENT OF TRANSPORTATION**

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August 13, 2021

SB-101-86.60  
SCH #: 2020100453

Holly R. Owen, Supervising Planner  
County of Santa Barbara  
Planning and Development  
624 W. Foster Road, Suite C  
Santa Maria, CA 93455

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ARCTIC  
COLD AGRICULTURAL PROCESSOR AND FREEZER PROJECT

Dear Ms. Owen:

The California Department of Transportation (Caltrans) thanks you for the opportunity to review the draft Environmental Impact Report (DEIR) for the Arctic Cold Agricultural Processor and Freezer Project (Arctic Cold) and offers the following comments at this time.

4.1

Caltrans previously reviewed the Notice of Preparation and provided a comment letter dated November 23, 2020, and an email with additional comments dated November 30, 2020 (see attached). The comments previously submitted still stand and reflect our concerns regarding this project. Our letter included specific comments regarding the flawed East Cat Canyon Oil Field Redevelopment Project traffic study, which Arctic Cold used as a baseline. Since the East Cat Canyon traffic study was not stamped by the PE and was flawed it should not have been relied upon for the Arctic Cold traffic study. Further that project was withdrawn by the applicant. Additionally, we could not find that an updated traffic study was completed for Arctic Cold.

We reviewed the Fehr & Peers Arctic Cold Vehicle Miles Traveled (VMT) Analysis Technical Memorandum dated February 22, 2021 included in the DEIR and find that it does not address our prior comments regarding the number of parking spaces that are excess to the requirements. Proposed projects that include

4.2

Ms. Holly R. Owen  
August 13, 2021  
Page 2

more parking spaces than required are not VMT reducing and this is a project feature that would not be supported by Caltrans.

4.2  
cont'd

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6555 or [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,

*Ingrid McRoberts*

Ingrid McRoberts  
Development Review Coordinator  
District 5, LD-IGR South Branch

Attachments

**DEPARTMENT OF TRANSPORTATION**

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November 23, 2020

SB-101-86.60  
SCH #: 2020100453

Holly R. Owen, Supervising Planner  
County of Santa Barbara  
Planning and Development  
624 W. Foster Road, Suite C  
Santa Maria, CA 93455

COMMENTS FOR THE NOTICE OF PREPARATION FOR THE ARCTIC COLD AGRICULTURAL  
PROCESSOR AND FREEZER PROJECT

Dear Ms. Owen:

The California Department of Transportation (Caltrans) thanks you for the opportunity to review the Notice of Preparation (NOP) for the Arctic Cold Agricultural Processor and Freezer Project and offers the following comments at this time.

**General Comments**

The project proposes to development a 449,248 square-foot (sf) agricultural processor and freezer facility on a 40-acre project site, located approximately 1.1 miles east of Hwy 101 and the City of Santa Maria. Other components of the project include installation of 588 parking spaces and widening East Betteravia along the frontage of the project area. The project will employ 153 regular full-time employees, and up to 623 seasonal employees during peak harvest season, working three shifts per day.

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals. Since the passage of SB 743 and the change of metric from Level of Service to



Vehicle Miles Traveled (VMT), we look forward to seeing what trip-reducing elements are included with any future project to lower its' impacts and potential mitigation.

### **Specific Comments**

The project proposes 588 parking spaces which is above the County of Santa Barbara's required 569 parking spaces. Proposed projects that include more parking spaces than required is not VMT reducing and is a project feature that would not be supported by Caltrans. We support efforts that decrease VMT by encouraging use of strategies such as employee shuttles and rideshare incentives; as these measures aid in accomplishing local and State goals, and are consistent with the Caltrans *Strategic Management Plan* and State planning priorities.

The Revised Traffic and Circulation Study dated July 21, 2020, cites the East Cat Canyon Oil Field Redevelopment Project traffic study dated June 2019, which Caltrans reviewed and provided a comment letter dated September 11, 2019. Caltrans found the East Cat Canyon traffic study to be flawed, and therefore should not be used as a baseline or point of reference. Further the project application was withdrawn by the applicant.

Caltrans requests early coordination with the County of Santa Barbara and the applicant to further discuss any necessary conditions of approval or mitigation measures.

Please be aware that any encroachment in the State's right-of-way it will require a permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the permit are issued at the discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/programs/traffic-operations/ep>.

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6555 or [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,



Ingrid McRoberts  
Development Review Coordinator  
District 5, LD-IGR South Branch

Attachment

**DEPARTMENT OF TRANSPORTATION**

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September 11, 2019

SB-101-82.18  
SCH# 2016101060

Kathryn Lehr, Planner  
County of Santa Barbara  
123 E. Anapamu Street  
Santa Barbara, CA 93101

COMMENTS FOR THE FINAL TRAFFIC AND CIRCULATION STUDY (FINAL TIS) FOR THE  
AERA EAST CAT CANYON OIL FIELD REDEVELOPMENT PLAN PROJECT

Dear Ms. Lehr:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Final TIS for the Aera East Cat Canyon Oil Field Redevelopment Plan Project. We offer the following comments:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

Caltrans previously reviewed the Draft Environmental Impact Report for this project and submitted the attached comment letter dated January 28, 2019 (Letter), which continues to apply to this project and its related CEQA documents.

Additionally, a number of the issues discussed in the Letter have not been addressed in the Final TIS. These unaddressed issues could result in project specific impacts, and possibly necessitate project specific mitigations that have not been fully realized. Please see Attachment A for additional Traffic Operations comments regarding the Final TIS.

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Ms. Kathryn Lehr  
September 11, 2019  
Page 2

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,



Ingrid McRoberts  
Development Review Coordinator  
District 5, LD-IGR South Branch

Attachments

## Attachment A

### Aera East Cat Canyon Oil Field Redevelopment Project - Final Traffic and Circulation Study

#### Caltrans Traffic Operations Comments

##### Report Comments:

- Page 11 – Project Trip Generation: The 12-hour project work shifts are 6:30 am to 6:30 pm. The labor related impacts fall outside the intersection counts taken from 7:00 am - 9:00 am, but are within the actual morning peak hour per the 2016 corridor counts. The morning analysis should be reflective of the actual peak hour and project impacts. Without this analysis, it is not possible to determine if the project requires specific mitigations for the morning peak.
- Page 12 – The Passenger Car Equivalent (PCE) calculations are not included in the Technical Appendix.
- Page 20 – Table 12: Caltrans does not accept LOS (Level of Service) D as an acceptable LOS. There is a cumulative impact to the US 101 SB Ramps/Clark Avenue.
- Page 20 – Mitigation Measures: Clarification is needed on the construction timeline for the US 101/ Clark Avenue ramp improvements. Per the Traffic Impact Analysis (TIA), the peak Average Daily Traffic (ADT) will happen at 8 years, and peak hours occur at 15 years. Please clarify if the US 101/Clark Avenue Ramp improvements be completed before the 8 year ADT peak or the 15 year Peak Hour. If the ramp is not completed by the 8 year, the ramp improvements cannot be considered a mitigation.
- Page 22 – Clarification is needed to ascertain whether trucking projects pay into a regional traffic impact fee program. If they do not, an alternative mitigation needs to be determined.
- Page 27 – Planned Improvements: The Betteravia Road southbound ramp improvements description should be modified. The project is not specifically adding two new eastbound through lanes; the two new lanes are advanced queuing storage for the northbound on-ramp left turn.
- Page 31 – Table 18 and 19, Footnote 1: Please clarify that the "Existing" conditions in the tables does not include any planned improvements to Betteravia Road or Clark Avenue at US 101 ramp improvements.
- Page 35 – Table 21 and 22, Footnote 1: Please clarify that the "Cumulative" condition does not include any improvements to the Clark Avenue at US 101 ramp improvements.
- Page 36 – Option 3: The comments above apply to Option 3, as well as Option 2.
- Page 58 – Table 35: Please add additional information to identify which hours are the peak hours considered for analysis, and what months the information was collected.

**Technical Appendix Comments:**

- **Traffic Counts:** As stated above, the morning peak appears to be between 6:15 – 7:15 am for the corridor counts taken mid-October 2016. Please indicate why the intersection counts taken in mid-January to mid-April 2019 did not include that hour, counts were only taken from 7:00 am - 9:00 am. The peak from 6:15 – 7:15 am may have a different LOS that needs mitigations for project specific impacts. Per page 11 of the report, the 12-hour work shifts for the project are 6:30 am to 6:30 pm. The labor related impacts fall outside of the intersection counts taken and within the actual morning peak hour.
- **Analysis:** The HCS7 Two-way Stop-Control Report has a calculated approach Delay and LOS in the printed reports provided in the appendices, in addition, there is a handwritten AWD = ##.# Sec LOS \_ at the bottom of the printed report. Normally, there is a difference between the report and the handwritten delay, and sometimes LOS. Please indicate if the handwritten information is what was utilized in the report, why the handwritten calculations were used in the TIA, and indicate the difference between the printed reports and the handwritten information.
- Please provide the analysis sheets for Clark Road/US 101 SB: Missing AM Cumulative + Project Option 2&3 + Mitigation
- Please provide the analysis sheets for Clark Road/US 101 SB: Missing PM Cumulative + Project Option 2&3 + Mitigation
- Review the HCS7 Cumulative report volumes with the TIA volumes, as some do not match. Please make corrections as necessary.
- Please provide the Synchro Models. The future operations of Betteravia Road with the planned improvements need to be reviewed with the Synchro model to insure the improvements have been properly configured.

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January 28, 2019

SB-101-82.18  
SCH# 2016101060

Kathryn Lehr, Planner  
County of Santa Barbara  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE  
AERA EAST CAT CANYON OIL FIELD REDEVELOPMENT PLAN PROJECT**

Dear Ms. Lehr:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the Aera East Cat Canyon Oil Field Redevelopment Plan Project. We offer the following comments.

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

An overall review of the DEIR found that the study appears to be incomplete. For example: the project is inconsistent and seems to have been segmented from the West Cat Canyon project, and the traffic counts are outdated.

Further, technical appendices were not included in the DEIR. Please provide count data, peak hour factors, Level of Service (LOS) calculations, and model outputs for our review so a complete evaluation of the traffic impacts can be completed.

Project specific impacts need to be identified to ensure that projects properly mitigate the specific impacts to maintain operational integrity of the facility. Any mitigations should meet Caltrans requirements. Truck trips should be converted and evaluated as passenger car equivalents. Regional impacts should include commuter trips. Please note the U.S. 101 corridor needs to be included in the Roadway Analysis, for all truck and commuter trips.

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Ms. Kathryn Lehr  
January 28, 2019  
Page 2

Currently there is a project under review by Caltrans for improvements to Clark Ave/U.S. 101. In light of the number of sizable projects in the area that may have impacts, it is important for the County and Caltrans to achieve continuity within our reports. If needed, we can provide additional project details.

Please see the attachment for specific comments on Appendix N – Traffic/Transportation Supporting Information.

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,



Ingrid McRoberts  
Development Review Coordinator  
District 5, LD-IGR South Branch

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to enhance California's economy and livability"*

Attachment

The following comments are based on a review of Appendix N – Traffic/Transportation Supporting Information, dated November 30, 2016, and should be incorporated into the next draft for review. These comments are also applicable to the May 14, 2018, Supplemental Analysis for the East Cat Canyon Production Plan Project.

Comments are as follows:

- Due to the high-profile nature of this project and other recent oil projects in the area, along with potential significant impacts from high trip generation, we request updated traffic counts when the report is revised.
- Page 1 – Introduction: Please expand the definition of Phase I and Phase II, as referenced.
- Page 3 – Cumulative Conditions: Please provide the list of approved and proposed projects as it was not included in the DEIR. The approved and proposed project list should include the City of Santa Maria and County of Santa Barbara projects.
- Please provide information on how the half-percent growth was determined. Alternately, the SBCAG standard for growth rate maybe applicable.
- The report states City of Santa Maria Model was utilized. Please provide information on which software program was used for the Model, and how data from this Model was produced for review. Please provide any synchro reports for review.
- The SBCAG regional model would be preferential as most of the project is located within the County of Santa Barbara, and U.S. 101 and Clark Avenue are within the County. Additionally, there are no technical appendices to review on the Model that the data produced.
- Page 3 – Level of Service Definitions and Standards: Since an LOS analysis was utilized in the study, this section should include Caltrans LOS standards for Caltrans facilities and corridors. All Caltrans facilities are required to perform at Caltrans LOS Standards, whether within city or unincorporated county boundaries.
- Page 4 – LOS Calculation Methods: If the City of Santa Maria would like to have ICU analysis for their facilities within their Right-of-Way, that is acceptable. However, Caltrans requires that the Highway Capacity Manual (HCM)



methodology be used for all Caltrans Facilities, signalized and unsignalized. These two methodologies can be shown side-by-side in the analysis if prepared. All mitigations for Caltrans facilities must be based on HCM LOS standards. The report should also be updated to the most current HCM 6<sup>th</sup> edition.

- Page 6 – Option 1 Truck Route: Consider showing Union Valley Parkway on the Maps. This comment is for all maps in the report.
- Page 7 – Existing Roadway Operations: The U.S. 101 corridor needs to be included in the Roadway Analysis.
- Page 7 – Existing Intersection Operations: Palmer Road at U.S. 101, and Cat Canyon at U.S. 101 should also be analyzed. The LOS calculations need to be updated to the HCM 6<sup>th</sup> edition methodology.
- Page 9 – Figure 4: Left turns are allowed at U.S. 101 and Clark Avenue; the intersection #2 geometry does not reflect that turning movement. Please update accordingly.
- Page 10 – Project Trip Generation: Please provide information on how the trips were determined by the applicant. The West Cat Canyon trips were based on barrels produced per day, please provide information on the basis the applicant used for this specific project. Please provide this information in the Technical Appendices for review.
- Page 10 – Table 3 Peak Project Trip Generation – All Options: Footnote 4 states that the peak hour trip generation assumes 4 trucks inbound and outbound per peak hour. Please provide information on what this is based upon and how that was determined. In reviewing the report, it appears that the project is in production approximately 12 hours per day from 6 a.m. to 6 p.m. If the plant is in operation for 12 hours and there are 200 one-way truck trips per day, then there are at least 17 truck trips per hour. It is necessary to convert each truck trip to passenger car equivalents. When converted, this increases the total overall number of truck trips to approximately 50 per hour instead of 8 per hour. Please update the ADT as well and update the figures and calculations throughout the rest of the document accordingly. The LOS and other calculations will need additional review once all of the data has been updated.
- Page 12 – Figure 5 Project Trip Distribution and Assignment – Option 1: The number of vehicles added to the U.S. 101 corridor need to be included in the Figures and analysis. Please apply this a general comment for all figures and analysis hereafter.

- Page 15 – Existing and Project Impacts – Option 1: Since an LOS analysis was utilized in the study, please include Caltrans LOS requirements.
- Page 21 – Table 11 Existing Roadway Operations – Option 2: The U.S. 101 corridor should be included in the Roadway Analysis. Please update the ADT volume to current volumes. Please note: Enos Ranch opened certain businesses in Fall of 2017, and travel patterns may have changed.
- Page 23 – Figure 11 Intersection Lane Geometry and Traffic Controls – Option 2: The intersection lane configuration at Betteravia Road and U.S. 101 has changed, please update to the current configuration. The Southbound off ramp has had a single right turn, shared through/left lane and single left turn lane since 2017. Additionally, the City of Santa Maria and Caltrans are about to start construction on the Betteravia Road Interchange Improvements. It may be more accurate to analyze the project impacts based on the upcoming improvements.
- Page 24 – Table 12 Existing Intersection Operations – Option 2: All Caltrans Facilities, Betteravia Road and U.S. 101, need to be evaluated using the HCM 6<sup>th</sup> Edition methodology as previously commented.
- Page 25 – Figure 12 Project Trip Distribution and Assignment – Option 2: Update intersections A, B, and C.
- Page 27 – Table 13 Project Trip Distribution - Option 2: If the trucks are using Betteravia Road and U.S. 101 instead of Clark Avenue and U.S. 101, it would likely shift the distribution percentages. The truck traffic is the majority of the vehicle trips so the 85% would be north of Betteravia Road and U.S. 101 and the remainder after the percentage of commuter trips would be left north of Clark Avenue and U.S. 101.
- Page 33 – Option 3: Please refer to previous comments regarding Betteravia Road and U.S. 101 as general comments, as well as the Option 2 comments, shown above.
- Page 47 – Alternative Cumulative Analysis: In light of the East Cat Canyon project, we re-reviewed the West Cat Canyon Revitalization Plan TIS and DEIR, which is similar in size and location, and the traffic studies were completed using the same methodology. The alternative cumulative analysis is flawed because the West Cat Canyon study was not accurately evaluated.

On West Cat Canyon the DEIR and TIS did not appear to evaluate the same scenarios. The DEIR evaluates existing, construction, and production without the

pipeline. The TIS evaluates existing, construction, production with the pipeline (baseline), and maintenance events. It is not clearly described in either document, but it may be that the maintenance event scenario in the TIS is considered the worst-case scenario in the DEIR, if that is the case one of the documents should clearly explain the connection.

The DEIR text body traffic numbers do not appear to match the traffic numbers provided in the TIS.

Examples:

Existing oil production: DEIR existing LCO trip 7 total one way trips or 3.5 total round trips (pg 4-10-6), TIS existing LCO 14 one way trips total or 7 total round trips (pg 2). This issue is prevalent throughout the document in the existing, construction, proposed baseline and maintenance event evaluations for existing and proposed trips.

The DEIR and TIS do not appear to evaluate with the same methodology. The DEIR assigns trucks a passenger car equivalent (PCE) of 1.5, which does not appear to be evaluated in the TIS. No PCE multipliers were discussed or calculated in the TIS. Additionally, due to the inconsistencies between the trip numbers in the DEIR and TIS it is difficult to determine if the PCE has been correctly implemented.

In both the East and West Cat Canyon TIS, the study finds no significant roadway impacts. Since Caltrans unsatisfied with the methodology used in both studies, we cannot concur with the statement of no significant impact.

- Page 52 – Regional Trucking Impacts: The corridors studied will be adequate.
- Page 56 – Trip Generation: The truck trips need to be re-evaluated with the passenger car equivalent for impacts to be properly assessed and mitigated per Caltrans requirements. 100 trucks per day is approximately 300 PCE vehicles.
- Page 57 – Potential Construction Impacts: Any access requirements or construction impacts to Caltrans Right-of-Way will require an encroachment permit.

## **Mcroberts, Ingrid@DOT**

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**From:** Mcroberts, Ingrid@DOT  
**Sent:** Monday, November 30, 2020 2:25 PM  
**To:** Owen, Holly  
**Subject:** RE: Comment letter\_Arctic Cold Ag Processor and Freezer Project\_TIS

Hello Holly,

I had a couple of comments regarding the traffic study which I did not include in our comment letter. The traffic study was not stamped by the PE; and the VMT was calculated using CALEEMod air quality model. An air quality model is not the appropriate way to calculate VMT. VMT should be calculated using Santa Barbara County Association of Governments (SBCAG) model, please attached the model outputs once the VMT is calculated.

If you would like me to revise our comment letter I can do that, otherwise if those changes are made we can review them in the draft EIR.

Thank you,  
Ingrid McRoberts  
Associate Transportation Planner  
IGR – Santa Barbara County  
District 5 ATP project Lead  
Caltrans, District 5  
**New phone: (805) 835-6555**

---

**From:** Mcroberts, Ingrid@DOT <Ingrid.Mcroberts@dot.ca.gov>  
**Sent:** Monday, November 23, 2020 2:54 PM  
**To:** Owen, Holly <howen@co.santa-barbara.ca.us>  
**Subject:** Comment letter\_Arctic Cold Ag Processor and Freezer Project\_TIS

Hello Ms. Owen:

Please accept the attached comment letter for the NOP for Arctic Cold Agricultural Processor and Freezer Project . A hard copy is also being mailed to your office.

Thank you,

Ingrid McRoberts

Associate Transportation Planner

IGR-Santa Barbara County

District 5 ATP Project Lead

Caltrans, District 5

Please note new number: (805) 835-6555

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**From:** Owen, Holly <[howen@co.santa-barbara.ca.us](mailto:howen@co.santa-barbara.ca.us)>  
**Sent:** Thursday, November 19, 2020 4:11 PM  
**To:** Mcroberts, Ingrid@DOT <[Ingrid.Mcroberts@dot.ca.gov](mailto:Ingrid.Mcroberts@dot.ca.gov)>  
**Cc:** Steve Conner <[sconner@rinconconsultants.com](mailto:sconner@rinconconsultants.com)>  
**Subject:** RE: Arctic Cold Ag Processor and Freezer Project\_TIS

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Hi, Ingrid:

I am copying Steve Conner on this for a response. We will certainly share with you anything that we receive.

Have a safe and happy upcoming holiday.



**Holly R. Owen**  
**Supervising Planner**  
Planning & Development  
624 W. Foster Rd., Ste. C  
Santa Maria, CA 93455  
805-934-6297  
[howen@countyofsb.org](mailto:howen@countyofsb.org)  
<http://www.countyofsb.org/plndev/home.sbc>

*In light of the measures recommended by the CDC and State Government, Planning & Development has enacted a "work remotely" program. We are committed to advancing projects and will stay in regular communication. While we regularly check voicemail, it is best to contact us via email. Thank you.*

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**From:** Mcroberts, Ingrid@DOT <[Ingrid.Mcroberts@dot.ca.gov](mailto:Ingrid.Mcroberts@dot.ca.gov)>  
**Sent:** Thursday, November 19, 2020 3:38 PM  
**To:** Owen, Holly <[howen@co.santa-barbara.ca.us](mailto:howen@co.santa-barbara.ca.us)>  
**Subject:** Arctic Cold Ag Processor and Freezer Project\_TIS

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

Hello Holly,

Has the applicant completed any traffic analysis on this project? If so is it possible to review it? Caltrans will be submitting a comment letter on this project, and would like to request early coordination.

Thank you,  
Ingrid McRoberts  
Associate Transportation Planner  
IGR – Santa Barbara County  
District 5 ATP project Lead  
Caltrans, District 5  
New phone: (805) 835-6555

## Letter 4

**COMMENTER:** Ingrid McRoberts, California Department of Transportation

**DATE:** August 13, 2021

### Response 4.1

The commenter states that Caltrans previously reviewed the Notice of Preparation (NOP) for the EIR and provided a comment letter dated November 23, 2020, and an email with additional comments dated November 30, 2020. The commenter states that their comments from those sources reflect their concerns regarding the project. The commenter states that the East Cat Canyon Oil Field Redevelopment Project traffic study (East Cat Canyon TIS) was used as a baseline for this project, but that the East Cat Canyon TIS was flawed, was not stamped by a professional engineer, and therefore should not have been relied upon for this project's traffic study. The commenter states that they could not find that an updated traffic study was completed for this project.

The commenter's November 23, 2020 letter submitted in response to the NOP is summarized in Section 1, Introduction, and included in full in Appendix A to the Draft EIR. The commenter's emailed comments from November 30, 2020 were submitted as a direct communication with County staff but are consistent with comments included in this letter.

The transportation analysis in the Draft EIR is described in Section 4.15, *Transportation and Circulation*. This analysis is based on the *Arctic Cold Storage and Packing Project Impact Study* (Arctic Cold TIS) prepared by ATE and the *Arctic Cold VMT Analysis*, prepared by Fehr & Peers. Both reports are included in Appendix L. The Arctic Cold TIS includes ADT counts conducted at two locations on sections of Betteravia Road east of U.S. 101 originally included in the East Cat Canyon TIS. These traffic counts were conducted by Metro Traffic Data, a professional traffic data collection company, following industry standards. No other information presented in the East Cat Canyon TIS was used for the Arctic Cold TIS.

New traffic counts were conducted for the Arctic Cold TIS at the U.S. 101/Betteravia Road interchange, which is under Caltrans jurisdiction, as well as at the Betteravia Road/Rosemary Road intersection which is maintained by the County (refer to discussion on page 7 of the Arctic Cold TIS in Appendix L). The traffic counts were conducted by National Data & Surveying Services. As requested in the commenter's November 23, 2020 letter submitted in response to the NOP, the morning traffic counts were completed from 6:00 AM to 9:00 AM to capture the earlier morning peak hour that is experienced at the interchange.

During the course of completing the updated study, ATE reviewed the roadway traffic volume data obtained from the East Cat Canyon TIS with the new counts conducted for the Arctic Cold TIS to confirm that the traffic volumes reported on Betteravia Road east of U.S. 101 remain valid. The comparison found that the peak period volumes counted on Betteravia Road west of U.S. 101 for the East Cat Canyon TIS are similar to the newer counts conducted for the Arctic Cold TIS. Table 8-2 summarizes the traffic volume comparison from these two studies.

**Table 8-2 Betteravia Road East of U.S. 101 Traffic Volume Comparison**

Count Source	AM Period	AM Volume (peak hour traffic)	PM Period	PM Volume (peak hour traffic)	Total AM & PM (peak hour traffic)
East Cat Canyon TIS	6:00 – 9:00 AM	2,134	4:00 – 6:00 PM	1,362	3,496
Arctic Cold TIS	6:00 – 9:00 AM	2,126	4:00 – 6:00 PM	1,363	3,489
Difference		8		1	7

The data presented in Table 8-2 validate the roadway ADT data used for the Arctic Cold TIS and illustrate that the count data obtained from the East Cat Canyon TIS are not flawed.

The levels of service calculated for the segments of Betteravia Road east of U.S. 101 utilized the County-adopted acceptable roadway capacity criteria. Levels of service for the U.S. 101/Betteravia Rod interchange were calculated using the Highway Capacity Manual (HCM) methodology requested by Caltrans. The level of service calculations were completed using the Synchro software which is accepted by Caltrans.

### Response 4.2

Caltrans states that the amount of parking provided exceeds requirements. The commenter states that projects that include more parking spaces than required are not VMT-reducing and that Caltrans would not support this project feature. The amount of parking provided by the project is consistent with the County’s parking code requirements. The applicant has requested a modification to reduce the required number of parking spaces. The applicant will also be required to provide a Traffic Demand Management Plan (TDMP) to reduce VMT and the demand for employee parking spaces. Section 2, Project Description has been revised to reflect the latest parking information associated with the project, as follows:

Based on County parking requirements, the various components of the project would result in a total required parking provision of 569 parking spaces. The project would provide 223 permanent parking spaces and 365 permanent/seasonal parking spaces, for a total of 588 parking spaces. The project would also provide 12 handicap parking spaces. project applicant is required to provide a total of 622 parking spaces for the proposed processing, warehouse, and offices uses. The applicant has requested a modification to reduce the required number of parking spaces from 622 to 532. The applicant will be required to provide a Traffic Demand Management Plan (TDMP) to reduce the number of Vehicle Miles Traveled (VMT) and reduce the demand for employee parking spaces. The TDMP will include programs for company-sponsored vanpools, carpool promotion and dedicated carpool spaces, assistance with employee enrollment in Emergency Ride Home, and TDMP marketing materials. The vanpool and carpool programs are anticipated to reduce parking demands by a minimum of 90 spaces. The proposed site plan would provide parking for 222 permanent employees along the northern and western portions of the site and 310 seasonal employee parking spaces at the southern end of the building. The project would provide 12 ADA-compliant parking spaces. Permanent employee parking would be surfaced with asphalt/concrete and seasonal employee parking would be surfaced with Class II road base. All parking spaces would be designated with painted striping.

An analysis of the project’s potential to generate new VMT as a result of employee trips and operational trips from produce shipping to and from the proposed freezer and processor facility is included in Section 4.13, *Transportation and Circulation*, Impact T2. As discussed therein, the VMT analysis for the project reflects the number of trips and distance of travel between employees’

location of residence and the project site using the SBCAG RTDM, consistent with the County's adopted methodology for evaluating project VMT impacts. The proposed project's projected VMT/employee would not exceed the County's adopted VMT threshold of 13.4 VMT/employee. The project's proposed parking plan is intended to respond to County parking requirements and is under review by County staff for compliance with applicable minimum parking requirements. The project applicant has indicated to County staff a preference for providing less parking, subject to County staff concurrence that minimum parking requirements are met. As described in Response 5.4, the project also includes an overflow parking area to which long haul trucks can be directed if a space at the loading dock is not available on arrival. The project does not include short-term or long-term truck parking on the project site. As a result, the project does not include parking that would address any need other than the immediate operational needs of the project, or otherwise increase or induce an increase in VMT. No changes to the Draft EIR are required as a result of this comment. However, the commenter's recommendation for reduced parking will be forwarded to the review authority of the County of Santa Barbara for consideration.





# MEMORANDUM

<b>Date:</b> August 13, 2021	
<b>To:</b> Holly Owen (Project Planner)	<b>Organization:</b> County of Santa Barbara
<b>From:</b> Erik Justesen <a href="mailto:epjustesen@rrmdesign.com">epjustesen@rrmdesign.com</a> Rachel Raynor <a href="mailto:rcraynor@rrmdesign.com">rcraynor@rrmdesign.com</a>	<b>Title:</b> Principal and CEO Associate Planner
<b>Topic:</b> 1750 East Betteravia Road Draft Environmental Impact Report Comments and Concerns	

RRM Design Group represents the neighboring landowner, Central City Cooling, located at 1701 East Betteravia which is directly across Betteravia from the proposed Arctic Cold project. We appreciate the opportunity to review and comment on the Arctic Cold Draft Environmental Impact Report (DEIR) released on June 29, 2021, for public comment. In addition to the comments from our July 28, 2020, comment letter and our comments at the August 5<sup>th</sup> hearing, Central City Cooling is submitting these written comments to identify aspects of the proposed project that are of concern to Central City Cooling. Specifically, the enclosed comments identify certain critical environmental impacts that will impact Central City Cooling’s operations and those of the applicant. It is the goal of Central City Cooling to ensure that the Arctic Cold Agricultural Freezer and Processor facility be designed in a way that minimizes the impacts and ensures that the Central City and Arctic Cold facilities and surrounding properties can co-exist and operate in a safe and viable manner.

5.1

RRM Design Group (RRM) provided comments to the County and applicant team on July 28, 2020, after conducting a review of the proposed project plans and supporting documents provided from County staff from the NBAR meeting on April 24, 2020, and the subsequent resubmittal of project plans and supporting documents in May 2020. In reviewing the Draft EIR, there is concern that the impact of the Project has been underestimated in the report. We are asking that a more detailed traffic study and analysis be conducted so that plans can be adjusted now to address impact and develop a better project.

The following comments and/or questions have been categorized per topic area of the Draft Environmental Impact Report to gain understanding and clarification of the proposed project’s operation. Our concerns and comments pertain primarily to the proposed access/circulation, questions related to the traffic analysis, and impacts to biological/agricultural resources. As the project is currently designed, we have significant concerns, unanswered questions, and oppose the continued development of this project without further analysis.



We would be happy to meet or confer to discuss our concerns and questions. We look forward to working with you on this project to ensure it addresses these concerns and can be developed in a manner that minimized impacts and enables continued viable operation of Central City Cooling and all other agricultural farming operations in the surrounding east Santa Maria area.

5.1  
cont'd

Sincerely,

**RRM DESIGN GROUP**

A handwritten signature in black ink, appearing to read 'Erik Justesen', written over a white background.

Erik Justesen  
Principal and CEO

cc: Rachel Raynor [rcraynor@rrmdesign.com](mailto:rcraynor@rrmdesign.com)  
David Swenk [david@urbanplanningconcepts.com](mailto:david@urbanplanningconcepts.com)

ARCTIC COLD DEIR		
RRM RESPONSES/COMMENTS – 4.2 AGRICULTURAL RESOURCES		
Comment #	Page # / Section / Figure Reference	Comment
<b>Issue Area – 4.2 Agricultural Resources</b>		
1	Pg. 4.2-13 states that ‘the project is intended to support historic crop production and agricultural productivity <i>in the region</i> by providing a supporting use for existing regional agricultural operations’.	In the project description on page ES-2, the proposed project is slated to serve other regions throughout California and Baja California, Mexico. The intended geographic area served by the proposed project is broader than what is reflected in the statement on pg. 4.2-13 and should be accurately reflected.

5.2

ARCTIC COLD DEIR		
RRM RESPONSES/COMMENTS – 4.4 BIOLOGICAL RESOURCES		
Comment #	Page # / Section / Figure Reference	Comment
<b>Issue Area – 4.4 Biological Resources</b>		
1	Impact BIO-2 (4.4-19); states there are three proposed crossings over the irrigation drainage that runs parallel to Betteravia Road along the proposed project frontage and that impacts may be potentially significant.	With mitigation this is not a residual impact issue; however, no bio issues exist off of Prell Road next to Mid-Coast Cooling. As described in the analysis of Alternative 3, this alternative would allow for the drainage to ‘retain its conveyance capacity and would continue to allow for wildlife movement.’ The irrigation ditch already runs during rains and how would the proposed crossings/obstructions further impact the capacity?

5.3

<b>ARCTIC COLD DEIR</b>		
<b>RRM RESPONSES/COMMENTS – 4.11 LAND USE AND PLANNING</b>		
<b>Comment #</b>	<b>Page # / Section / Figure Reference</b>	<b>Comment</b>
<b>Issue Area – 4.11 Land Use and Planning</b>		
1	Pg. 4.11-7 states ‘the on-site circulation plan would be designed pursuant to County design standards to accommodate emergency vehicles, service vehicles, and delivery trucks.’	<ul style="list-style-type: none"> <li>• The site plan shows the circulation, but no parking for said vehicles. Central City Cooling uses scheduled appointments to pace and meter traffic through its facility, but once operations commenced, discovered that the nature of trucking produce means that scheduled appointments do not always work the way intended. CCC noted that trucks arriving early were parking on Betteravia Road and remedied the issue by doubling the available long-haul truck parking stalls on-site. Notwithstanding the plans for scheduling deliveries, proper on-site parking for all types of vehicles needs to be required as a condition to approval to avoid parking on Betteravia Road which can pose a traffic hazard.</li> </ul>
2	Overall Circulation and Access	<ul style="list-style-type: none"> <li>• Overall circulation and access are critical safety issues that need to be studied in detail prior to approval of this Project. Existing traffic on East Betteravia is heavy, with a combination of long-haul trucks, field trucks, passenger vehicles, and agricultural equipment serving areas east of Rosemary Road. Careful planning, evaluation, and proper design will be necessary to avoid chronic circulation and access problems for the proposed project and existing facilities to address overflow impacts. Heavy traffic will also cause and further deterioration to County and/or City roadways. Please provide analysis of these issues in the DEIR and traffic analysis.</li> <li>• What types of produce will be processed by the proposed Arctic Cooling facility? Differing types of agricultural products require distinct types of trucks and vehicles to serve it and typically have distinctive circulation patterns. Please provide evaluation for this dynamic in the traffic analysis.</li> <li>• Due to proximity of the existing Central City Cooling facility, the primary point of access for the Arctic Cooling Facility should be carefully coordinated/considered with the existing site access to Central City Cooling to avoid and minimize vehicle conflicts. Additional analysis to determine if circulation and access conflicts between the two facilities would occur.</li> </ul>

5.4

5.5

		<p>Specifically, we request that additional traffic analysis evaluate use of Rosemary Road as the primary project access point so as to consolidate access at Betteravia Road and determine whether intersection control may be warranted. Limit a secondary access point to either Prell Road to the south or another access point at Betteravia that would align with the drive access to the Central City facility to the north. (Please refer to the attached diagram).</p> <ul style="list-style-type: none"> <li>• The County’s Circulation Map indicates that East Betteravia Road along the project frontage is categorized as a two-lane major road. According to the County’s classification, a two-lane major road is an “undivided, two-lane road with intersections at grade and partial control of access. Two Lane Major Roads serve as a secondary type of arterial facility carrying local through traffic within communities.” The Circulation Element limits 10,000 Average Daily Trips (ADT) for rural areas within this roadway classification. The proposed project exceeds the ADT policy capacity east of Highway 101, with 12,617 ADT, per Table 9, as provided in the Traffic Study. A review of why the traffic volume exceeds ADT policy and what will be done to mitigate this exceedance of County policy should be implemented as part of the approval process.</li> <li>• The cumulative plus proposed project traffic exceeds the allotted ADT policy capacity; therefore, the Conditional Use Permit findings are not met. Further clarification and discussion with staff are necessary regarding the interpretation of this policy statement in regard to the roadway classification.</li> <li>• Caltrans’s comment letter states the East Cat Canyon traffic study cited in the traffic/circulation study for the project was found to be flawed and should not be used as a baseline or point of reference; please refer to comment letter submitted by Caltrans on September 11, 2019 and provide clarification on the basis of the analysis.</li> </ul>	5.5 cont'd
3	<p>Revised Traffic and Circulation Study; pg. 23 states ‘the design of the driveways was developed based on input provided by County staff. Based on the direction provided, Betteravia Road will be widened and restriped to provide a 14-foot center left-turn lane</p>	<ul style="list-style-type: none"> <li>• Please indicate on the plans the intended striping for such an improvement. Only the left-turn onto Rosemary Road (south of Betteravia Road) is apparent.</li> <li>• A deceleration lane is appropriate and should be included as part of the planning to mitigate traffic circulation and safety concerns.</li> <li>• Given current traffic conditions on Betteravia, additional traffic analysis is warranted to evaluate use of Rosemary Road as the primary project access point to consolidate access at Betteravia Road and determine whether</li> </ul>	5.6

	along the entire site frontage to accommodate westbound left-turns into the site (as well eastbound left-turns into the parcels on the north side of Betteravia Road).	intersection control may be warranted. If a secondary point of access is necessary, it should be limited to either Prell Road to the south or another access point at Betteravia that would align with the drive access to Central City facility to the north. (see attached diagram)	5.6 cont'd
4	No specific section/figure reference	<ul style="list-style-type: none"> <li>The Phillips 66 Station, north of Betteravia Road at East Battles Road and Rosemary Road no longer carries oil by pipeline, but via trucks, which has only increased the amount of vehicular (and particularly larger service/delivery vehicle traffic). Please investigate this and include in the traffic analysis.</li> <li>Is this additional truck traffic considered in the cumulative plus project analysis?</li> </ul>	5.7
5	Page 9 of Revised Traffic and Circulation Study	<ul style="list-style-type: none"> <li>Pg. 9 of Revised Traffic and Circulation Study provides City of Santa Maria level of Service (LOS) standards; however, the project site is located in the County of Santa Barbara and should therefore comply with the County of Santa Barbara thresholds, which requires a LOS of C or better.</li> </ul>	5.8

ARCTIC COLD DEIR			
RRM RESPONSES/COMMENTS – 4.13 TRANSPORTATION AND CIRCULATION			
<i>Comment #</i>	<i>Page # / Section / Figure Reference</i>	<i>Comment</i>	
<b>Issue Area – 4.13 Transportation and Circulation</b>			
1	The VMT analysis states that an office designation is the comparative quantification method of calculating VMTs for the proposed project. The proposed land use is not primarily office space and encompasses primarily agricultural/manufacturing uses.	In the County’s Transportation Analysis Updates, there is no ‘office’ designation, but an ‘employment category’. Would the ‘Other land use types’ category be more appropriate? How are trucks that are traveling from Baja California and other parts of California, as quoted in the EIR, assumed in the VMT analysis? Please provide a full description of the long-haul truck traffic volume, frequency, and impact to air quality, VMT and ADT in this DEIR. This is of significant concern due to overtaxed road and intersection system in the farming area east of Santa Maria.	5.9
2	Vehicle miles traveled (VMT) Analysis	<ul style="list-style-type: none"> <li>The project’s calculated VMTs was only 9.3 VMT/employee. There is no traffic analysis of agricultural vehicles including field trucks, long-haul trucks, and/or</li> </ul>	5.10

		<p>agricultural equipment. This is a significant oversight of the DEIR. Please provide complete analysis of all vehicle traffic.</p> <ul style="list-style-type: none"> <li>• How are VMTs from Baja California, Mexico calculated into the VMT analysis? What percentage of trips or miles traveled are those assumed to be?</li> <li>• Pg. 4.6-9, Table 4.6-4 identifies 7.8% of Vehicle Trips as Heavy Trucks/Other and 49.9% as Light/Medium Trucks. How is this captured in the VMT analysis?</li> <li>• The Arctic Cold Facility Storage project in Oxnard, CA estimates the daily trips as approximately 4,501 whereas the proposed Arctic Cold project in Santa Maria cited a total of 152 Average Daily Trips (ADT). Even though the facility in Oxnard is roughly 100,000 square feet larger than the Santa Maria project, the total number of trips seems grossly under assumed. Please provide project specific impact analysis and details.</li> </ul>	5.10 cont'd
3	Revised Traffic and Circulation Study	The Revised Traffic and Circulation Study states ‘the facility would process crops grown in the greater Santa Maria Valley area and from other regions throughout California and Baja.’ Only employee generated trips are quantified in the VMT analysis - more information would be helpful to assess the impact of crop transport trips. In the referenced Office of Planning and Research VMT Technical Advisory heavy-duty truck VMT is a modeling type which considers both automobile (passenger vehicles) and heavy truck (long haul) VMT. Please provide additional clarification regarding the appropriate project VMT modeling system.	5.11
4	Impact T-3 on pg. 4.13-6	The Revised Traffic and Circulation Study discusses the project frontage improvements and states that ‘the results of the left-turn analysis show that separate left-turn lanes are not warranted on Betteravia Road for turning into the Project driveways. Currently, the existing traffic conditions of left turns along Betteravia Road (heading either west and east) impact the flow of traffic and cause delays for through traffic and pose safety hazards. Given the volume of traffic that currently exists in the area, traffic increases from future farming activities and those contemplated by the proposed facility. Please provide additional analysis regarding circulation and access to and from the proposed project.	5.12
5	Revised Traffic and Circulation Study, page 10 states the peak harvest period as May through August	The peak harvest season / time period would be more months out of a year if geographic areas, such as Baja California (as stated in the project description) are served.	5.13

6	Impact T-2 discussion states that the 'proposed facility would reduce operational VMT because local agricultural operations are currently transporting produce to more distant freezer and processor facilities.'	The project description clearly states that product from Baja California and other regions of California will be coming to this facility. How are these trips factored into the VMT analysis? How is this serving primarily local agricultural operations with such a large geographic target area served? Please provide analysis related to trips generated during peak harvest season locally and from imported products shipped from out of area including Baja California in the traffic modeling and analysis.	5.14
7	Table 4.13-1 (Project VMT Comparison to County Average VMT) on page 4.13-5	Table 4.13-1 (Project VMT Comparison to County Average VMT) on page 4.13-5 is inconsistent to the VMT Analysis prepared by Associated Transportation Engineers on August 10, 2020 (included in Appendix L). Please clarify inconsistency.	5.15

ARCTIC COLD DEIR			
RRM RESPONSES/COMMENTS – 4.10 HYDROLOGY AND WATER QUALITY			
Comment #	Page # / Section / Figure Reference	Comment	
<b>Issue Area – 4.10 Hydrology and Water Quality</b>			
1	Section 2.5.9 states that 'based upon metered volumes from another similar facility for the same company that would operate the project...'	Please clarify the name of the other similar facility. In looking at the Sakioka Farms Business Park Specific Plan EIR (which is where the Arctic Cold Oxnard facility is located), the analysis does not provide the water demand numbers specific to the Arctic Cold use. Please provide background to Arctic Cold Santa Maria water demand calculations in Section 2.5.9.	5.16
2	Page 4.10-2, provides that 'water levels throughout the [Santa Maria Groundwater] basin have declined since the beginning of the most recent drought in 2012.'	<ul style="list-style-type: none"> <li>We are overall concerned of the proposed volume of water as it relates to the return flow. From familiarity with existing cold storage facilities, the return flow is approximately 50% of process water generated. Additionally, the time it may take to infiltrate this water back to ground water levels suitable for extraction is unknown. Please provide additional evaluation of ground water recharge and potential impacts on surrounding well operation.</li> <li>Confirm if Arctic Cold will use water to wash product arriving on-site and whether that is factored into the water analysis?</li> </ul>	5.17



ARCTIC COLD DEIR		
RRM RESPONSES/COMMENTS – 4.11 UTILITIES AND SERVICE SYSTEMS		
Comment #	Page # / Section / Figure Reference	Comment
<b>Issue Area – 4.14 Utilities and Service Systems</b>		
1	Section 4.14.1a	The City of Santa Maria water supply intends to serve the property for purposes of fire protection, as provided by the conditional can and will serve letter. Confirm the intent for the proposed project and whether connection to City water is slated for domestic purposes.
2	Page 4.14-1: 'groundwater levels across the majority of the Santa Maria Valley Management Area (SMVMA) remain slightly above historical low levels and do not meet the definition of a condition of sever water shortage'.	What category does the SMVMA fall under?
3	Section 4.14.1d	<ul style="list-style-type: none"> <li>There are often outages in the eastern Santa Maria Valley, as experienced by the Central City Cooling facility. Notwithstanding a will serve letter, PG&amp;E should be required to confirm its capacity to service the demands without outages. Outages for agricultural companies are economically catastrophic. Further, businesses will have to provide electric vehicle charging for long haul trucks in the near future, which will place a greater demand on electric supply in the area.</li> </ul>
4	Page 4.14-11 the water section cites that the project would draw groundwater from the local water purveyor, the City of Santa Maria.	<ul style="list-style-type: none"> <li>Please clarify if this is intended for water beyond the will serve letter committed to providing fire water service.</li> </ul>

5.18  
5.19  
5.20  
5.21

CENTRAL CITY

Secondary access from a new aligned drive with existing Central City Cooling facility to avoid conflicting vehicle turning movements.

BETTERAVIA

E BETTERAVIA RD

Evaluate if traffic control is warranted at Rosemary intersection.

Integrate long haul / field truck parking on the proposed site to avoid large vehicles from parking on Betteravia Road shoulder.

PROPOSED SITE

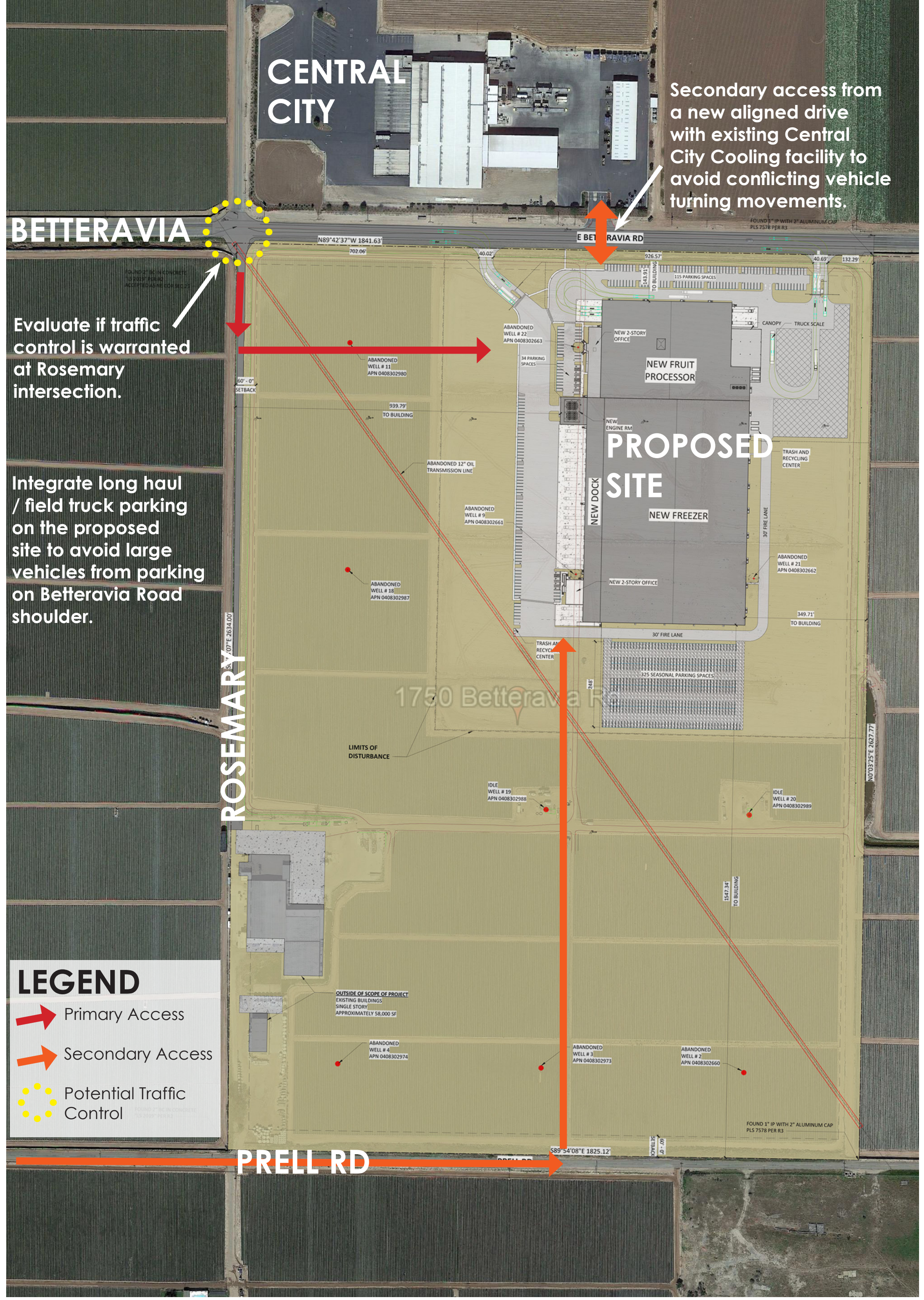
ROSEMARY

1750 Betteravia Rd

LEGEND

- Primary Access
- Secondary Access
- Potential Traffic Control

PRELL RD



## Letter 5

**COMMENTER:** Erik Justesen; RRM Design Group

**DATE:** August 13, 2021

### Response 5.1

This comment is introductory and states the comments were submitted on behalf of Central City Cooling. The commenter expresses opposition to the Project and states their concerns pertain primarily to the proposed access/circulation, traffic analysis, and impacts to biological and agricultural resources. The commenters specific comments are responded to in Response 5.2 through Response 5.21.

### Response 5.2

The commenter states that the discussion regarding the area the project would serve is inconsistent between the Executive Summary and Section 4.2, *Agricultural Resources*. The Executive Summary correctly states that the processor facility would receive produce from local growers as well as from other regions throughout California and Baja California for processing. The following text was added to Section 4.2.3(c) to clarify that the project would serve regions throughout California and Baja California:

The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California. In the context of northern Santa Barbara County, the project is intended to support historic crop production and agricultural productivity in the region by providing a supporting use for existing regional agricultural operations. The project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. Consistency with this Land Use code requirement would ensure the proportion of produce coming into the processor facility from locations outside of a 25-mile radius would be relatively small. The typical local peak harvest period would be May through August. The portion of produce coming into the processor facility is planned to be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility. Accordingly, the project would not contribute to the increased conversion of prime and unique agricultural lands. Therefore, the project's contribution to cumulative impacts to agricultural resources would not be cumulatively considerable.

### Response 5.3

The commenter states that Alternative 3 would retain the capacity of the on-site irrigation ditch and requests additional information on how the Project's proposed crossings over the on-site irrigation ditch would affect the capacity. The project would have three crossings over the irrigation drainage along the northern boundary of the project site. As stated in Section 4.15, *Effects Not Found to be Significant*, Subsection 4.15.2, *Biological Resources*, irrigation drainage would retain its conveyance capacity throughout project activities, which includes construction and operational activities. Similarly, Alternatives 2 and 3 would allow the irrigation drainage to retain its conveyance capacity.

## Response 5.4

The commenter states that the project site plan does not show parking for vehicles that would be circulating on the project site. The commenter states that the Central City Cooling facility located north of the project site across Betteravia Road uses scheduled appointments to pace and meter traffic through its facility, but that once operations commenced the operator discovered that appointments were not always consistent with the schedule. The commenter states that the Central City Cooling operator noted that trucks arriving early were parking on Betteravia Road and remedied the issue by doubling the available truck parking stalls on their property. The commenter states that proper on-site parking for all types of vehicles needs to be required as a condition to approval to avoid parking on Betteravia Road which could pose a traffic hazard.

The project applicant notes that the planned trucking operation for the proposed project would not be identical to the Central City Cooling facility. For the proposed project imported fruit would be processed and stored in the warehouse freezer, and outbound deliveries of the processed product would be metered out over a longer time frame. The applicant estimates approximately 30 long haul trucks would access the project site to transport processed fruit on a daily basis. Trucks entering the site would park in loading docks to load the processed fruit and then depart the site. In the event that a long haul truck arrives at the site and finds the loading docks full, the truck would be directed to park in the overflow parking area south of the building until a space in the loading dock becomes available. As a result, the project does not include short-term or long-term truck parking on the project site. No changes to the Draft EIR are necessary as a result of this comment.

## Response 5.5

The commenter states that the Draft EIR needs to study circulation and access issues including existing traffic on East Betteravia Road, long haul trucks, field trucks, passenger vehicles, agricultural equipment serving areas east of Rosemary Road, and potential overflow impacts. The commenter notes that Caltrans's comment letter (Letter 4) states the East Cat Canyon traffic study cited in the traffic/circulation study for the project was found to be flawed and should not be used as a baseline or point of reference.

The Draft EIR analysis of the project's potential to transportation and circulation impacts is based on the Arctic Cold TIS prepared by ATE, which is summarized in Section 4.13, *Transportation and Circulation*, and included in Appendix L. The Arctic Cold TIS includes analysis of all anticipated project traffic, including truck traffic, and provides a detailed description of the types of products and the types of trucks that would access the site to deliver the crops and to export the processed products. The applicant design team worked with County staff to develop the planned improvements on Betteravia Road to safely accommodate project access. Planned improvements include:

- Location and spacing of driveways on Betteravia Road to be consistent with County engineering design standards and provide sufficient off-sets to the Central City Cooling driveway on the north side of Betteravia Road;
- Widening Betteravia Road to include a 14-foot center left-turn along the entire Project frontage to accommodate left-turns into the site as well as into the properties located on the north side of Betteravia Road;
- Widening the south side of Betteravia Road to provide a 5-foot shoulder and a 5-foot bike lane that would provide a deceleration area for trucks turning into the project driveways, further improving safety; and
- Design of the Project driveways to accommodate truck turns to and from Betteravia Road.

The City and County roadways that would accommodate project traffic have been constructed to current standards and are maintained by the City and the County. Project ingress and egress driveways were designed to accommodate the truck turning movements using the applicable truck turn templates for field trucks and long haul trucks. The traffic analysis does not evaluate primary access via Rosemary Road because the proposed project development area is not contiguous to Rosemary Road. The applicant design team worked with County staff to develop planned improvements on Betteravia Road for project access that meet the County's engineering design standards, including the spacing of driveways on the north and south sides of Betteravia Road. The planned improvements for Betteravia Road include a 14-foot center left-turn and widening along the south side to provide a 5-foot shoulder and a 5-foot bike lane (the 10-foot shoulder/bike lane would provide a deceleration area for trucks turning into the project driveways).

The 12,617 ADT volume referenced by the commenter is for the 4-lane section of Betteravia Road east of U.S. 101 and not the 2-lane section of Betteravia Road along the project site frontage. The County's policy capacity for a 4-lane arterial is 30,000 ADT and the policy capacity for a 4-lane major road is 20,000 ADT. The volumes on the 4-lane section of Betteravia Road are well within the applicable policy capacities.

Refer to Response 4.1 for a discussion of the validity of the data from the East Cat Canyon traffic study that was used in the Arctic Cold TIS. New ADT traffic counts at two locations on Betteravia Road east of U.S. 101 were conducted by Metro Traffic Data, a professional traffic data collection company. The traffic counts were conducted to industry standards. No other information presented in the East Cat Canyon traffic study was used for the ATE Revised Traffic Study.

## **Response 5.6**

The commenter requests that the intended striping of Betteravia Road be depicted on the project plans, and states that only the left-turn onto Rosemary Road (south of Betteravia Road) is apparent. The commenter states that a deceleration lane is appropriate and should be included as part of the planning to mitigate traffic circulation and safety concerns. The commenter states that additional traffic analysis is warranted to evaluate use of Rosemary Road as the primary project access point to consolidate access at Betteravia Road and determine whether intersection control may be warranted. The commenter states that if a secondary point of access is necessary, it should be limited to either Prell Road to the south or another access point at Betteravia Road that would align with the drive access to Central City facility to the north.

The proposed improvement plans for Betteravia Road are shown on page 24 of the Arctic Cold TIS (Appendix L). The plans show the 14-foot center left-turn on Betteravia Road along the entire Project frontage as well as the widening along the south side of Betteravia Road to provide a 5-foot shoulder and a 5-foot bike lane. The proposed configuration provides a deceleration lane for trucks and automobiles turning right into the site driveways.

As discussed in Response 5.5, access to Rosemary Road was not considered because the proposed project development area is not contiguous to Rosemary Road. The applicant design team worked with County staff to develop planned improvements on Betteravia Road for project access that meet the County's engineering design standards, including the spacing of driveways on the north and south sides of Betteravia Road.

### Response 5.7

The commenter states that the Phillips 66 station located north of Betteravia Road at East Battles Road and Rosemary Road no longer carries oil by pipeline, but via trucks, which has increased the amount of larger service/delivery vehicle traffic. The commenter recommends that this traffic be accounted for in the traffic analysis and asks whether this additional truck traffic considered in the cumulative plus project analysis. The Arctic Cold TIS is based on new traffic counts collected for the Betteravia Road corridor intersections, which include the existing truck traffic using the Phillips 66 station. The Phillips 66 trucks were also accounted for in the cumulative scenario. It should also be noted that the Phillips 66 station is slated to be closed and decommissioned in 2023, which would eliminate the associated truck traffic assumed in the project traffic evaluation. As a result, inclusion of this traffic in the cumulative traffic scenario represents a conservative assumption regarding potential future/cumulative traffic levels along Betteravia Road.

### Response 5.8

The commenter states that the Arctic Cold TIS provides City of Santa Maria level of Service (LOS) standards; however, the commenter notes that the project site is located in the County of Santa Barbara and should comply with the County of Santa Barbara standards, which require a LOS of C or better. It is the County's administrative practice for County projects to apply the standards of the jurisdiction where the roadway and/or intersection facilities are located. The U.S. 101/Betteravia Road interchange is located in the City of Santa Maria. Therefore, the City of Santa Maria's LOS D standard was applied to the U.S. 101/Betteravia Road interchange and the County's LOS C threshold was applied to the Rosemary Road intersection. It is noted that operations at the U.S. 101/Betteravia Road interchange were forecast at LOS C or better, which also meets the County's LOS C threshold.

### Response 5.9

The commenter states that the VMT analysis uses an office designation as the comparative quantification method of calculating VMTs for the proposed project. The commenter states that the proposed land use is not primarily office space and encompasses primarily agricultural/manufacturing uses. The commenter notes that the County's Transportation Analysis Updates do not include an 'office' designation, but an 'employment category.' The commenter recommends including a description of the long haul truck traffic volume and frequency, and associated impacts to air quality, VMT, and ADT in the Draft EIR.

The Draft EIR analysis of the project's potential to generate new VMT is included in Section 4.13, *Transportation and Circulation*, Impact T-2, and is based on the *Arctic Cold VMT Analysis* prepared by Fehr & Peers, which is included in Appendix L. The VMT analysis is based on the County's Environmental Thresholds and Guidelines Manual, which provides the land use categories for project types for use in the VMT analysis (Chapter 18, Table 1). The VMT analysis considers the VMT generated by employees working at the project site. The employment land use category includes manufacturing, wholesaling and distribution, and agricultural uses. Therefore, the project correctly applied the employment land use category to the VMT analysis.

The VMT analysis follows the County Guidelines that state that employment projects should analyze VMT using an efficiency metric (i.e., on a per employee basis) rather than based on absolute VMT. Further, the VMT analysis used to determine transportation impacts of the proposed project considers the home-based work VMT per employee and reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network.

As referenced in the County Guidelines, CEQA Guidelines Section 15064.3(a) focuses on “automobile travel” and the Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR Technical Advisory) states that “automobile” refers to on-road passenger vehicles, specifically cars and light trucks, and does not include heavy-duty trucks, semi-trailers, construction equipment, or other commercial-type vehicles. The OPR Technical Advisory states: “Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation.” Therefore, the VMT methodology and thresholds applied to the proposed project related to employment generating uses considers the home-based work VMT per employee in comparison to County impact thresholds.

The project’s potential to result in new long haul truck traffic is described in Section 4.3, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, which include a description of anticipated truck traffic and an estimate of criteria pollutant and GHG emissions associated with this activity. These analyses are based on the Air Quality and Greenhouse Gas Emissions Analysis Memorandum prepared by LSA (included as Appendix C), supported by data from the Arctic Cold TIS prepared by ATE (included as Appendix L). Response 6.3 includes a discussion and specific revisions that were made in Section 4.3, *Air Quality*, and Section 4.8, *Greenhouse Gas Emissions*, to reflect the project’s potential operational air quality and GHG impacts based on project-generated truck trips. As described therein, the revised Arctic Cold TIS forecasted project-generated ADT of 1,642 including 396 truck trips during the peak harvest season.

### **Response 5.10**

The commenter states that there is no traffic analysis of agricultural vehicles including field trucks, long-haul trucks, and/or agricultural equipment and requests a complete analysis of all vehicle traffic be included in the Draft EIR. The commenter points to analysis of the Arctic Cold Facility Storage project in Oxnard and states that this facility is estimated to result in 4,501 daily trips in comparison to the 152 ADT for the proposed project. The commenter states that the project’s ADT appear to be underestimated and requests clarification.

As discussed in Response 5.9, the VMT analysis follows applicable County Guidelines that state that employment projects should analyze VMT using an efficiency metric (i.e., on a per employee basis) rather than based on absolute VMT. The VMT analysis used to determine transportation impacts of the proposed project considers the home-based work VMT per employee and reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network. As referenced in the County Guidelines, CEQA Guidelines Section 15064.3(a) focuses on “automobile travel” and the OPR Technical Advisory states that “automobile” refers to on-road passenger vehicles, specifically cars and light trucks, and does not include heavy-duty trucks, semi-trailers, construction equipment, or other commercial-type vehicles. Therefore, the VMT methodology and thresholds applied to the proposed project related to employment generating uses only considers the home-based work VMT per employee in comparison to County impact thresholds.

While the County’s VMT thresholds for employment-related land uses like the proposed project do not consider heavy-duty trucks or other commercial vehicles, truck travel demand for transporting produce during peak harvest season locally and from imported products is considered in the Arctic Cold TIS and in the other relevant components of the Draft EIR including air quality and GHG emissions analysis, as discussed in Response 5.9. As stated in the County Guidelines, non-VMT transportation

metrics and threshold questions apply to an entire project, including potential impacts from commercial and passenger vehicles traveling to and from the facility.

Table 4.6-4 in Section 4.6, *Energy*, describes the proportion of vehicle trips that are identified as “heavy trucks/other” and “light/medium trucks,” based on the estimated vehicle trips from Table 4.4 “Fleet Mix” in the Air Quality and Greenhouse Gas Analysis Memorandum prepared by LSA (Draft EIR Appendix C). This estimate is developed using vehicle data from the Arctic Cold TIS prepared by ATE (Appendix L) and is not reflected in the VMT analysis because the County’s VMT thresholds for employment-related land uses like the proposed project do not consider heavy-duty trucks or other commercial vehicles.

The transportation analysis in the Draft EIR is included in Section 4.15, *Transportation and Circulation*. The peak harvest season time period is identified in the Arctic Cold TIS, which shows an ADT of 1,642 including 396 truck trips during the peak harvest season (see Appendix L Table 3B). This trip generation estimate was developed based on detailed operational data regarding the number of field trucks, warehouse trucks and employees that would travel to the facility on a daily basis. The trip generation estimates developed based on the operational data were also verified using the data presented in the Institute of Transportation Engineers Trip Generation Manual which showed a comparable trip generation estimate of 1,603 ADT (see Appendix L Table 4).

### **Response 5.11**

The commenter indicates that the Arctic Cold TIS states “the facility would process crops grown in the greater Santa Maria Valley area and from other regions throughout California and Baja,” whereas only employee generated trips are quantified in the VMT analysis, and requests more information to assess the impact of crop transport trips. The commenter notes that the OPR Technical Advisory includes heavy-duty truck VMT as a modeling type which considers both passenger vehicles and heavy truck VMT, and requests clarification regarding the appropriate project VMT modeling system. While the County’s VMT thresholds for employment-related land uses like the proposed project do not consider heavy-duty trucks or other commercial vehicles, these types of vehicles are considered in the Arctic Cold TIS and in the other relevant components of the Draft EIR including air quality and GHG emissions analysis, as discussed in Response 5.9. As stated in the County Guidelines, non-VMT transportation metrics and threshold questions apply to an entire project, including potential impacts from commercial and passenger vehicles traveling to and from the facility. Response 5.10 discusses the VMT analysis for employees working at the project site.

Regarding the request for additional clarification on the VMT modeling system, the VMT analysis utilized the SBCAG RTDM. The version of the SBCAG RTDM applied to the project was developed for the Fast Forward 2040: SBCAG Regional Transportation Plan and Sustainable Communities Strategy (SBCAG RTP/SCS) (SBCAG 2017). The SBCAG RTDM is a four-step travel demand model that estimates the trip generation, trip distribution, mode choice, and trip assignment for land uses in Santa Barbara County. The SBCAG RTDM can be used to forecast travel demand generated by a proposed project and the resulting trip matrices can be used to track the origin and destination of trips by trip type to calculate the home-based VMT generated by the project on a daily basis. Since the County’s VMT impact thresholds are based on this version of the SBCAG RTDM, applying it to the project VMT analysis ensures that a consistent methodology is being used to determine potential VMT impacts in comparison to the County’s VMT thresholds.



### **Response 5.12**

The commenter states that the existing traffic conditions of left turns along Betteravia Road impact the flow of traffic and cause delays for through traffic and pose safety hazards. The commenter states that future farming activities and the proposed facility would increase existing traffic in the area, and requests additional analysis regarding circulation and access to and from the proposed project. The Arctic Cold TIS evaluated the need for a separate left-turn lane on Betteravia Road and found that the left-turn warrants were not met at this location. However, the applicant design team worked with their traffic consultant (ATE) and County staff to plan the improvements on Betteravia Road for project access, including the location and spacing of driveways, widening Betteravia Road to include a 14-foot center left-turn, and widening along the south side to provide a 5-foot shoulder and a 5-foot bike lane (the 10-foot shoulder/bike lane would provide a deceleration area for trucks turning into the project driveways).

### **Response 5.13**

The commenter notes that the Arctic Cold TIS states that the peak harvest period would be May through August. The commenter states that the peak harvest season would include more months out of a year if geographic areas such as Baja California are served by the project. As described in Section 2, Project Description, the processor facility would receive produce from local growers as well as from other regions throughout California and Baja California for processing. The project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. Consistency with this Land Use code requirement would ensure the proportion of produce coming into the processor facility from locations outside of a 25-mile radius would be relatively small. According to the project applicant, the portion of produce coming into the processor facility is planned to be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility. Thus, the peak harvest season time period is correctly described in the traffic study.

### **Response 5.14**

The commenter states that Impact T-2 indicates the proposed facility would reduce operational VMT because local agricultural operations are currently transporting produce to more distant freezer and processor facilities. The commenter notes that the project description states that product would be coming to the facility from Baja California and other regions of California, and asks how these trips are accounted for in the VMT analysis. The commenter requests analysis of trips generated during peak harvest season locally and from imported products in the traffic modeling and analysis. As discussed in Response 5.13, the project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. The portion of produce coming into the processor facility would be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility.

As discussed in Response 5.9, the VMT analysis for transportation impacts follows the County Guidelines that state that employment projects should analyze VMT using an efficiency metric (i.e., on a per employee basis) rather than based on absolute VMT. As stated in the County Guidelines, non-VMT transportation metrics and threshold questions apply to an entire project, including potential impacts from commercial and passenger vehicles traveling to and from the facility. Impact T-2 accurately states that the proposed facility would reduce operational VMT because local

agricultural operations are currently transporting produce to more distant freezer and processor facilities. The VMT analysis used to determine transportation impacts of the proposed project considers the home-based work VMT per employee and reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network. While not applicable to the VMT analysis, truck travel demand for transporting produce during peak harvest season locally and from imported products is considered in the Arctic Cold TIS and in the other relevant components of the Draft EIR including air quality and GHG emissions analysis.

### **Response 5.15**

The commenter states that Table 4.13-1 (Project VMT Comparison to County Average VMT) in Impact T-2 is inconsistent with the VMT Analysis prepared by ATE in the Arctic Cold TIS (included in Appendix L). The VMT information presented in Table 4.13-1 is based on the VMT analysis prepared by Fehr & Peers (*Arctic Cold VMT Analysis*, dated February 22, 2021, included in Appendix L). The VMT study conducted by ATE was completed prior to the adoption of the updated transportation thresholds published in the County's Guidelines. Therefore, following the County's adoption of the new VMT thresholds as required under CEQA, Fehr & Peers completed a VMT analysis in compliance with the County Guidelines and the results of this analysis were used in the Draft EIR to determine the potential VMT impacts of the proposed project.

### **Response 5.16**

The commenter requests additional details on the water demand calculations, including which similar facility was used as a basis for the Project's water demand. The project applicant has provided the County with historic metered water use volumes for two existing facilities that provide similar operations, and which are controlled by the applicant. The applicant has designed the proposed facility to be of the same scale and operational levels of the existing facilities. As a result, the proposed facility is expected to have similar water demand as the existing facilities for which historic metered water use volumes were provided. The water demand estimate for the proposed facility provided in Section 2, *Project Description*, is based on the historic water use data for the existing facilities which are controlled by the applicant.

### **Response 5.17**

The commenter states that return flow is approximately 50 percent of process water generation and requests additional evaluation of groundwater recharge and potential impacts on surrounding well operations. The commenter also requests additional information on whether the project will use water to wash product that is delivered to the site, and if that is factored into the water demand analysis. Detailed calculations of the project's water use are included in the geohydrology reports in Appendix I of the Draft EIR. As summarized in Section 2, *Project Description*, Subsection 2.5.9, *Water Use*, an estimated 60 percent of the process and cooling water (133 AFY) would return to the groundwater through infiltration. As described in Response 5.16, the estimated water demand for the proposed facility is based on historic metered water use volumes for two existing facilities that provide similar operations, and which are controlled by the applicant. As described in Section 2, *Project Description*, the processor facility would result in an anticipated maximum water demand of approximately 200.6 AFY, which includes wash water for product delivered to the site.

### **Response 5.18**

The commenter states that the City of Santa Maria would provide water for fire suppression services and requests confirmation on whether City water would be used for domestic purposes. The project does not include a connection to the City of Santa Maria public water supply system. As stated in Section 2, *Project Description*, Subsection 2.5.9, *Water Use*, the project would include installation of a new on-site groundwater well to provide potable water as well as water for emergency purposes, such as fire suppression. The applicant has indicated they may seek a connection to the City of Santa Maria's public water supply, if such connection is found to be feasible. However, for the purposes of the Draft EIR the project is assumed to be supplied by the proposed new well. Section 4.14, *Utilities and Service Systems*, Subsection 4.14.1(a), *Water*, provides existing environmental setting information on the City of Santa Maria water supplies. Although the project does not include a connection to the City of Santa Maria public water supply system, the information provided in Subsection 4.14.1(a) is relevant because the City of Santa Maria's water supplies, which includes groundwater, were considered in the cumulative analysis in Subsection 4.14.3(c), *Cumulative Impacts*. In addition, the analysis of impacts to water supply in Impact U-1 is consistent with the assumption that water would be supplied via groundwater.

### **Response 5.19**

The commenter refers to Section 4.14, *Utilities and Service Systems*, Subsection 4.14.1(a), *Water*, and asks what category the SMVMA falls under. It is not clear what category the commenter is referring to; therefore, a specific response cannot be provided. As stated in Section 4.14, *Utilities and Service Systems*, Subsection 4.14.1(a), *Water*, the shallow and deep groundwater levels across the majority of the SMVMA remain slightly above historical low levels and do not meet the definition of a condition of severe water shortage.

### **Response 5.20**

The commenter states that power outages often occur in eastern Santa Maria Valley and that PG&E should be required to confirm capacity to service the demands without outages. The commenter also states that businesses will have to provide electric vehicle charging stations in the future which will increase electricity demand. Existing power outages and PG&E's ability to provide service without power outages is outside the scope of the proposed project. The project's potential energy and electricity-related environmental impacts are discussed in Section 4.6, *Energy*. Mitigation Measure AQ-1 in Section 4.3, *Air Quality*, includes a requirement that the project applicant provide electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units at all loading/unloading docks and trailer spaces. The commenter's concerns regarding electrical outages and the potential provision of electric charging stations for vehicles and trucks do not pertain to the adequacy of the environmental analysis in the draft EIR, but the commenter's concerns and recommendations will be forwarded to the review authority of the County of Santa Barbara for consideration.

### **Response 5.21**

The commenter states that the project would draw groundwater from the local water purveyor, the City of Santa Maria. The comment requests clarification on whether the groundwater use is in addition to City water for fire suppression. Please refer to Response 5.18 for a discussion of proposed water supply. Water would be supplied from on-site groundwater wells and not from the local water purveyor, the City of Santa Maria. The text cited in the comment (in Section 4.14, *Utilities and Service*

*Systems*, Subsection 4.14.3(c), *Cumulative Impacts*) correctly states that the project would use groundwater and that the City also relies on groundwater supplies. However, Subsection 4.14.3(c), *Cumulative Impacts*, has been revised as follows for clarification:

The geographic scope for cumulative water supply impacts is the Santa Maria Groundwater Basin. This geographic scope is appropriate because the project would draw groundwater from on-site wells, and ~~the~~ the local water purveyor, the City of Santa Maria, also sources its water supply substantially through the basin.



August 13, 2021

Holly Owen  
 Santa Barbara County  
 Planning and Development  
 624 W. Foster Road  
 Santa Maria, CA 93455

Email Only: howen@co.santa-barbara.ca.us

**Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the Arctic Cold Agricultural Processor and Freezer Project, 20DVP-00000-00003, 20CUP-00000-00005**

Dear Holly Owen:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (EIR) for the referenced project, which consists of the construction and operation of a 449,248 square foot (SF) freezer and processor facility. The 127,546 SF processor section includes a cooler, canopy, and areas for dry storage, warehousing, processing, administration, and maintenance. The processor will receive strawberries from local flatbed trucks and refrigerated trucks from California and Baja and inspect, sort, process, and package the berries. The 321,702 SF freezer section includes a freezer, blast freezer, dock, administrative area, and mechanical area. The freezer will function as a cold distribution warehouse where product is received on temperature-controlled docks, placed in blast freezers or sent to cold storage, and eventually shipped throughout the United States. The project is expected to generate 454 average daily trips (ADT) during the non-harvest season including 148 truck trips and 1,642 ADT during the peak harvest season including 396 truck trips. Proposed combustion equipment includes a 351 horsepower (hp) diesel fire pump, four 100 hp Miura low-NO<sub>x</sub> boilers, one 300 hp Miura low-NO<sub>x</sub> boiler, and four propane forklifts. Excavation for construction of the project will require 64,876 cubic yards (cy) of cut and 50,311 cy of fill. The subject property, two parcels totaling 108.76 acres, is zoned AG-II-40, identified in the Assessor Parcel Map Book as APNs 128-097-001 and -002, and is located at 1750 East Betteravia Road in the unincorporated Santa Maria area.

6.1

Based on the project description and information that has been provided, the proposed project includes equipment subject to District permit requirements and prohibitory rules. **Therefore, the District will be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the CEQA determination when evaluating any District permits for proposed equipment.** The CEQA document should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to District permit issuance.

District staff have the following comments on the Draft EIR:

- 1. Draft EIR, Section 1.3 Lead, Responsible, and Trustee Agencies, Page 1-5:** As described above, the proposed project includes equipment subject to District permit requirements and prohibitory rules. Therefore, the District will be a responsible agency under CEQA. Please list the District as a responsible agency in this section.

6.2

- 2. Draft EIR, Section 4.3 Air Quality, Operation, Page 4.3-7 and Appendix C, Air Quality and GHG Analysis, Attachment C, Mobile Source Emission Estimates:** The discussion in this section and mobile source emission estimates rely on an ADT of 1,380 including 212 truck trips. Please update these values to align with the ADT presented in the Revised Traffic and Circulation Study (Associated Transportation Engineers, July 21, 2020) which shows an ADT of 1,642 including 396 truck trips during the peak harvest season. Please note that when the analysis is updated, mobile emissions of Reactive Organic Compounds (ROCs) may exceed the County's threshold of 25 pounds per day.

6.3
- 3. Draft EIR, Section 4.3 Air Quality, Operational Emission Thresholds, Page 4.3-8 and Table 4.3-4 Project Operational Emissions, Page 4.3-12:** This document should rely on the County of Santa Barbara's adopted CEQA thresholds, included on page 21 of the [January 2021 Environmental Thresholds and Guidelines Manual](#) (i.e., air quality thresholds for combined mobile and stationary source emissions of 55 pounds per day for NOx and ROC, and 80 pounds per day for PM<sub>10</sub>), rather than the District's air quality thresholds. The District's air quality thresholds are meant to be applied to projects for which the District is a lead agency or for jurisdictions that do not have adopted thresholds of significance. Also, it is our understanding that the County's 55 pounds per day threshold applies to NOx and ROC separately, not NOx and ROC combined.

6.4
- 4. Draft EIR, Section 4.3 Air Quality, Mitigation Measures, Impact AQ-2, Page 4.3-10:** Please include the following measure in the list of standard dust control and equipment exhaust measures: *"Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized."*

6.5
- 5. Draft EIR, Section 4.3 Air Quality, Mitigation Measures AQ-1 NOx Emission Reduction Measures, Pages 4.3-12 to 4.3-13:** The District has several comments on this mitigation measure.

6.6

  - a. Offsite Mitigation:** The measure currently only includes options for onsite mitigation of NOx. The County should consider whether offsite projects to reduce NOx, such as emission reductions projects at nearby facilities or contributions to an offsite mitigation project or program, are also feasible.

If an offsite mitigation project or program is feasible, the District could use funds provided by the applicant to implement a mitigation project or program to achieve the required reductions. Offsite emission reductions can result from either stationary or mobile sources but should relate to the impacts from the project in order to provide the proper "nexus" for the air quality mitigation. It should be noted that an offsite mitigation project or program is likely to be much more cost-effective than permanently retiring ERCs, given that the current average cost of NOx ERCs in Santa Barbara County is approximately \$125,000 per ton.
  - b. Feasibility:** The EIR should include mitigation measures that are feasible and enforceable. Page 4.3-13 discusses how the project applicant will have limited control

over the composition of truck fleets using the facility. The lead agency should consider whether Mitigation Measure AQ-1, requiring that “All TRUs entering the project site shall be plug-in capable”, is feasible, or whether modifications are necessary to make the measure feasible and enforceable.

6.6  
cont'd

- c. Enforcement: The Plan Requirements and Timing section for this mitigation measure states, “Upon issuance of the air quality permit, implementation monitoring of these measures may be transferred to SBCAPCD staff to streamline enforcement.” The District generally does not have the ability to regulate mobile sources that are regulated at the state level and do not require a permit with the District [e.g., truck and transportation refrigeration unit (TRU) use], unless they are creating an air quality nuisance. Compliance with this mitigation measure would be the responsibility of the lead agency, and these requirements should be included as conditions of approval for the development plan and/or conditional use permit. Please revise this section accordingly.
- d. Reference Error: The Plan Requirements and Timing section refers to measures “C through H” but only measures A through F are listed. Please revise this section to refer to the correct measures.

**6. Draft EIR, Section 4.3 Air Quality, Impact AQ-4, Operational, and Table 4.3-5 Health Risk from Diesel Fire Pump to Nearest Receptor, Pages 4.3-14 to 4.3-15 and Appendix C Air Quality and GHG Analysis, Attachment E, HRA Model Snapshots:** In order for the District to rely on the provided Health Risk Assessment (HRA) for CEQA responsible agency purposes, the HRA should be updated as follows:

6.7

- a. Property Boundary Receptors: The HRA must include receptors along the property boundary because the nearby agricultural fields are immediately adjacent to the property. These receptors should be generated at a spacing no larger than 10 meters.
- b. Receptor Height: Revise the HRA to use a flagpole height of 1.5 meters for all receptors.
- c. Engine Stack Parameters: The actual engine stack parameters, not the default parameters, must be used in the revised HRA. Based on the provided manufacturer’s specifications sheet, the engine’s exhaust flow rate is 1878 cfm, the temperature is 816 °F, and the stack diameter is 6 inches. The planned installed stack height should be used in the revised HRA.
- d. Worker Adjustment Factor: An 8-hour worker adjustment factor (WAF) is not required because 8-hour non-cancer risk is not calculated for new diesel engines; there is no 8-hour REL for diesel PM. However, a cancer WAF is required for the worker cancer risk analysis. The WAF should be 4.2, as shown in the calculations below. Revise the HRA accordingly.

$$a. \quad DF = \frac{H_{coincident}}{H_{worker}} * \frac{D_{coincident}}{D_{worker}} = \frac{1 \text{ hr/day}}{8 \text{ hr/day}} * \frac{1 \text{ day/week}}{5 \text{ days/week}} = 0.025$$

$$b. \quad WAF = \frac{H_{residential}}{H_{source}} * \frac{D_{residential}}{D_{source}} * DF = \frac{24 \text{ hr/day}}{1 \text{ hr/day}} * \frac{7 \text{ days/week}}{1 \text{ day/week}} * 0.025 = 4.2$$

- e. **Residential Risks:** In the revised HRA, please calculate the cancer and chronic non-cancer risks at the MEIR using HARP 2. Present these results in Table D and update the text to clarify that a refined HRA was run using HARP 2.

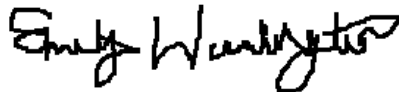
6.7  
cont'd

- 7. Draft EIR, Section 4.8 Greenhouse Gas Emissions, Mitigation Measures, GHG-1 Greenhouse Gas Reduction Program, Pages 4.8-14 to 4.8-15:** We recommend that Mitigation Measure GHG-1 include the implementation of any feasible local GHG reduction projects as an option to achieve the necessary GHG reductions. Local GHG mitigation efforts can provide additional co-benefits to the local community. The District has identified some potential strategies for local GHG mitigation that could be implemented in Santa Barbara County. Please see [www.ourair.org/ghgmitigation-sbc/](http://www.ourair.org/ghgmitigation-sbc/) for more information.

6.8

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8878 or via email at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org).

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Steve Connor, Rincon Consultants  
Chris Bersbach, Rincon Consultants  
David Harris, Manager, District Engineering Division  
William Sarraf, Supervisor, District Engineering Division  
Planning Chron File



## Letter 6

**COMMENTER:** Emily Waddington; Santa Barbara County Air Pollution Control District

**DATE:** August 13, 2021

### Response 6.1

The commenter notes that the Santa Barbara County Air Pollution Control District (SBCAPCD) has reviewed the Draft EIR for the proposed project and provides a summary of their understanding of the project. The commenter notes that the project includes equipment subject to SBCAPCD permit requirements and prohibitory rules, that SBCAPCD will be a responsible agency under CEQA, and that SBCAPCD will rely on the CEQA determination when evaluating permits for proposed equipment. The commenter states that the EIR should include the air pollutant emissions for all proposed equipment. The proposed project's potential air pollutant emissions are described and evaluated in Section 4.3, *Air Quality*. The commenters statements are responded to in Response 6.2 through Response 6.8.

### Response 6.2

The commenter requests that SBCAPCD be listed as a responsible agency in Section 1.3, *Lead, Responsible, and Trustee Agencies*. The following text identifying the responsible agencies for the project has been added to Section 1.3, *Lead, Responsible, and Trustee Agencies*:

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the State Water Resources Control Board (SWRCB) Central Coast Regional Water Quality Control Board (RWQCB) for review of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit application and issuance of a waste discharge requirements permit for wastewater systems, and the County Flood Control District for review of the proposed detention basin system, the State Water Resources Control Board for approval for the proposed public water system, California Department of Fish and Wildlife (CDFW) for administering the California Endangered Species Act and the California Fish and Game Code, United States Fish and Wildlife Service (USFWS) will be a responsible agency for implementing the Federal Endangered Species Act, and Santa Barbara County Air Pollution Control District (SBCAPCD) for review of project equipment subject to SBCAPCD permit requirements and prohibitory rules.

The following text identifying SBCAPCD as a responsible agency has been added to Section 2.7, *Required Approvals*:

The Santa Barbara County Air Pollution Control District (SBCAPCD) will be a responsible agency for the proposed boilers and any other regulated stationary sources of pollutant emissions. SBCAPCD inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal and state Clean Air Acts.

The following text has been added to Section 4.3.2(c), *Local Regulations*:

SBCAPCD, the lead air quality regulatory agency for Santa Barbara County, maintains air quality comprehensive programs for planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The 2001 Clean Air Plan (CAP) was adopted as the County portion of the SIP, designed to meet and maintain clean air standards. The 2019

Ozone Plan (2019 Plan) is the ninth triennial update to the initial state Air Quality Attainment Plan adopted by the SBCAPCD Board of Directors in 1991 (other updates were done in 1994, 1998, 2001, 2004, 2007, 2010, 2013, and 2016). Each of the plan updates have implemented an “every feasible measure” strategy to ensure continued progress toward attainment of the state ozone standards (SBCAPCD 2019). SBCAPCD also inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the federal and state Clean Air Acts. SBCAPCD would be a responsible agency for the proposed boilers and any other regulated stationary sources of pollutant emissions.

### Response 6.3

The commenter states that the EIR air quality analysis should be updated to rely on values that align with the ADT presented in the revised Arctic Cold TIS (ATE, July 21, 2020) which was prepared subsequent to the preparation of the air quality analysis. The revised Arctic Cold TIS forecasted project-generated ADT of 1,642 including 396 truck trips during the peak harvest season. The commenter refers to the analysis in the Draft EIR as well as the Air Quality and Greenhouse Gas Emissions Analysis Memorandum prepared by LSA (included as Appendix C to the Draft EIR). LSA has incorporated the ADT values referenced by the commenter and developed updated model outputs which are included in Appendix C. The revised emissions totals associated with these updated model outputs indicate that mobile source ROC emissions would exceed the Santa Barbara County mobile source emission threshold. As shown in Table 4.3-4 of the Draft EIR, the potential environmental impact associated with ozone precursor emissions, which include both ROC and NO<sub>x</sub> emissions, has already been identified as significant and unavoidable. While the project’s estimated ROC emissions would increase compared to those analyzed in the Draft EIR, the increase would not result in a new significant impact as the previously identified ozone precursor emissions exceeded the applicable County threshold, and the increase from the revised analysis does not represent a new or substantially more severe impact than has been disclosed in the Draft EIR.

Section 4.3, *Air Quality*, of the Draft EIR has been revised to reflect the project’s potential operational air quality impacts based on the ADT values referenced by the commenter and the updated model outputs developed by LSA. Section 4.3.3(a), *Methodology and Significance Thresholds*, has been revised as follows:

Long-term operation emissions associated with the project were calculated using CalEEMod. The CalEEMod analysis assumed 449,248 square feet of “refrigerated warehouse-no rail” and ~~a 496 space~~ approximately 200,000 square feet of parking lot area. In addition, total trip generation for the project was based on trip generation rates calculated in the project’s Traffic and Circulation Study (Associated Transportation Engineers 2020, Appendix L) and fleet mix obtained from CalEEMod (Appendix C). The project would generate approximately ~~1,380~~ 1,642 average daily trips, with ~~1,168~~ 1,246 employee trips and ~~212~~ 396 truck trips. ~~Trip lengths in CalEEMod were also revised based on the field truck/vans trip distribution percentage, estimated origin and designation, and the estimated average one-way trip length (LSA Associates 2021). Based on the total miles traveled and the field truck/vans trip distribution percentage, the average trip length was estimated to be 24.9 miles. Mobile source emissions were evaluated based on CARB’s 2017 EMFAC web database using vehicle class-specific emissions factors and vehicle miles traveled. Calculation details are shown in Appendix C.~~

Impact AQ-3 has been revised as follows:

**IMPACT AQ-3 PROJECT OPERATIONAL EMISSIONS WOULD EXCEED THE COUNTY’S SIGNIFICANCE THRESHOLDS FOR NO<sub>x</sub> EMISSIONS. IMPLEMENTATION OF REQUIRED MITIGATION WOULD REDUCE NO<sub>x</sub> EMISSIONS TO THE EXTENT FEASIBLE. HOWEVER, PROJECT-RELATED NO<sub>x</sub> EMISSIONS WOULD REMAIN ABOVE APPLICABLE NO<sub>x</sub> EMISSION THRESHOLDS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Project-related long-term air emissions would occur primarily from vehicle trips associated with the project (i.e., mobile source emissions) and boiler emissions. The project would use refrigerated trucks from other regions throughout California and Baja. Project-related long-term air emissions would also occur from the use of electricity and natural gas (i.e., energy source emissions), the use of landscape equipment and from the use of consumer products (i.e., area source emissions), the use of the forklifts (off-road emissions), the use of the fire pump system (i.e., stationary source emissions) and the use of the boilers. PM<sub>10</sub> emissions result from exhaust produced when a vehicle is running, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM<sub>10</sub> occurs when vehicle tires pulverize small rocks and pavement and the vehicle movement generate airborne dust. The contribution of tire and brake wear is small compared to the other sources of PM emissions. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Following the methodology discussed above, ~~construction-related~~ operational emissions were estimated using CalEEMod. Estimated maximum operational emissions are shown in Table 4.3-4.

**Table 4.3-3 Project Operational Emissions**

	Maximum Emissions (pounds per day)					
	CO	NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile Source Emissions	<del>77.3</del> <u>126.5</u>	<del>357.6</del> <u>652.9</u>	<del>23.3</del> <u>43.2</u>	<del>0.8</del> <u>1.1</u>	<del>10.5</del> <u>18.9</u>	<del>15.0</del> <u>22.7</u>
Energy Source Emissions	0.4	0.4	<0.1	<0.1	<0.1	<0.1
Area Source Emissions	0.1	<0.1	12.6	<0.1	<0.1	<0.1
Off-road Emissions	13.8	12.7	1.4	<0.1	0.8	0.8
Stationary Source Emissions	3.0	3.2	1.2	<0.1	0.2	0.2
Boiler Emissions	194.6	7.2	3.5	43.1	4.9	<0.1
<b>Total Project Operation Emissions</b>	<del>289.2</del> <b><u>338.4</u></b>	<del>381.1</del> <b><u>676.4</u></b>	<del>42.0</del> <b><u>61.9</u></b>	<del>9.8</del> <b><u>10.1</u></b>	<del>16.4</del> <b><u>24.8</u></b>	<del>16.0</del> <b><u>23.7</u></b>
Santa Barbara County Mobile Source Significance Threshold	N/A	25	25	N/A	N/A	N/A
<b>Mobile Source Threshold Exceeded?</b>	<b>N/A</b>	<b>Yes</b>	<del>No</del> <b><u>Yes</u></b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Santa Barbara County All Source Significance Threshold	N/A	<del>240</del> <u>55</u>	<u>55</u>	N/A	80	N/A
<b>All Source Threshold Exceeded?</b>	<b>N/A</b>	<b>Yes</b>	<b><u>Yes</u></b>	<b>N/A</b>	<b>No</b>	<b>N/A</b>

Source: LSA Associates 2021 (Appendix C).

As shown in Table 4.3-4, mobile source emissions associated with the project would exceed the applicable Santa Barbara County threshold for mobile NO<sub>x</sub> and ROC emissions. The project's total emissions of ROC and NO<sub>x</sub> would exceed the Santa Barbara County threshold for ROC and NO<sub>x</sub> combined, primarily as a result of the project's high emissions of NO<sub>x</sub> and ROC from mobile sources.

## Mitigation Measures

### AQ-1 NO<sub>x</sub> and ROC Emissions Reduction Measures

The applicant shall implement the following NO<sub>x</sub> and ROC emission reduction measures:

- a. Provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- b. All loading/unloading docks and trailer spaces shall be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units. This requirement decreases the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration shall be encouraged for operational fleets to the maximum extent feasible.
- c. All TRUs entering the project site shall be plug-in capable.
- d. All heavy-duty trucks entering or on the project site shall be model year 2014 or later to the maximum extent feasible. Operational fleets shall use zero-emission light and medium-duty delivery trucks and vans to the maximum extent feasible. The applicant shall expedite a transition to zero-emission vehicles, with all operational fleets being fully zero-emission beginning in 2030.
- e. On-site TRU diesel engine runtime shall be limited to no longer than 15 minutes.
- f. Include rooftop solar panels to the maximum extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

**Plan Requirements and Timing.** The Conditional Use Permit shall require that the applicant report operational characteristics to Planning and Development staff annually, with the initial report due three months after initial project operation. Annual reports shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures ~~€~~ A through ~~¶~~ F are being implemented on an on-going basis.

If the project applicant applies for a stationary source air permit from the SBCAPCD, the applicant shall demonstrate to the satisfaction of Planning and Development staff that measures ~~€~~ A through ~~¶~~ F are incorporated into the air quality permit requirements. ~~Upon issuance of the air quality permit, implementation monitoring of these measures may be transferred to SBCAPCD staff to streamline enforcement.~~

**Monitoring.** Planning and Development compliance monitoring staff shall incorporate these NO<sub>x</sub> and ROC emission reduction measures into the project Conditional Use Permit. Prior to issuance of the Conditional Use Permit, the applicant shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures (a, b, and i) have been constructed.

## Significance After Mitigation

Implementation of Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> and ROC emissions to the extent feasible by providing infrastructure necessary to support zero-emission vehicles and equipment. The project can provide infrastructure to support zero-emission vehicles and equipment; however incoming produce would be transported by trucks owned by local growers and growers from other regions and Baja. The project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies as mitigation for the proposed project. Due to the project's limited control over other parties' truck fleets, the project could not feasibly reduce mobile source emissions by 90 percent, the amount required to reduce the project's NO<sub>x</sub> and ROC emissions below the applicable mobile source NO<sub>x</sub> and ROC threshold. As a result, the potential impact of the project's operational emissions of NO<sub>x</sub> and ROC would be significant and unavoidable.

ROC and NO<sub>x</sub> emissions associated with the project would be regional in nature, meaning that the air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project; emissions are released in other areas of the SCCAB (i.e., vehicles traveling to the project site would release emissions along roadways throughout the SCCAB and not specifically on the project site). Although operational emissions exceed the Santa Barbara County's operational mobile significance threshold for NO<sub>x</sub> and ROC, it is speculative to estimate the concentration of ozone that would be created at or near the project site on a particular day or month of the year, or the specific human health impacts that may occur. Meteorology, the presence of sunlight and other complex chemical factors all combine to determine the ultimate concentrations and locations of ozone. This is especially true for the project, where most of the criteria pollutant emissions derive not from a single "point source," but from mobile sources (cars and trucks) driving to, from, and around the project site.

In addition, it is speculative to estimate the impact of the estimated NO<sub>x</sub> and ROC emissions on NAAQS attainment. As discussed above, the currently available tools are equipped to model the impact of all emission sources in the air basin on attainment. According to the SBCAPCD's 2019 Ozone Plan, basin-wide emissions in 2012 were 71.6 tons per day for NO<sub>x</sub> emissions (SBCAPCD 2019). Running the photochemical grid model used for predicting ozone attainment with the emissions solely from project (which equates to less than one tenth of one percent for NO<sub>x</sub>) is not likely to yield pertinent information given the relatively small scale involved. It is not scientifically feasible at the time of drafting of this report to substantively connect this individual project's air quality impacts to likely health consequences so that the public may make informed decisions regarding the costs and benefits of the project. Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> emissions to the extent feasible; however, for the reasons describe above the potential impact of the project's operational emissions of NO<sub>x</sub> and ROC would remain significant and unavoidable.

In addition to the revisions to the Section 4.3, *Air Quality*, the modification to mobile trips would increase the project's estimated GHG emissions. As shown in Table 4.8-1 of the Draft EIR, the potential environmental impact associated with GHG emissions has already been identified as significant and unavoidable. While the project's estimated GHG emissions would increase compared to those analyzed in the Draft EIR, the increase would not result in a new significant impact as the previously identified GHG emissions exceeded the applicable threshold, and the increase from the revised

analysis does not represent a new or substantially more severe impact than has been disclosed in the Draft EIR.

Section 4.8, *Greenhouse Gas Emissions*, has been revised to reflect the project’s increase in GHG emissions from the increase in mobile trips. Impact GHG-1 has been revised as follows:

**Table 4.8-4 Project Annual Equivalent GHG Emissions**

<b>Emission Source</b>	<b>Annual Emissions (MT CO<sub>2</sub>e)</b>
<b>Construction<sup>1</sup></b>	<b>30</b>
<b>Operational</b>	
Mobile	<del>9,224</del> <u>11,064</u>
Area	<1
Energy	5,234
Solid Waste	196
Water	119
Off-road	297
Stationary Equipment	12,764
<b>Total Project Emissions</b>	<b><del>27,864</del> <u>29,704</u></b>
Service Population	271
<b>Service Population Emissions Rate</b>	<b><del>102.8</del> <u>109.6</u> MT CO<sub>2</sub>e/SP</b>
Significance Threshold	3.8 MT CO <sub>2</sub> e/SP
<b>Threshold Exceeded?</b>	<b>Yes</b>

<sup>1</sup> Construction emissions were estimated to be 908 MT CO<sub>2</sub>e. Results were amortized over a 30-year period.  
 Source: Appendix C CalEEMod worksheets

As shown in Table 4.8-1, annual emissions from the project would be approximately ~~27,864~~ 29,704 MT CO<sub>2</sub>e, which would exceed the County’s screening threshold of 300 MT CO<sub>2</sub>e. On a per-service population basis, the project’s annual emissions would be approximately ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population (~~27,864~~ 29,704 MT CO<sub>2</sub>e / 271 service population), which would exceed the County’s significance threshold of 3.8 MT CO<sub>2</sub>e per service population. Therefore, impacts from GHG emissions would be potentially significant.

### **Mitigation Measures**

The Air Quality Analysis and Greenhouse Gas Analysis Memorandum (Draft EIR Appendix C) evaluates the project’s GHG emissions using a sector-by-sector approach to identify potential GHG-reduction measures. The potential feasibility of specific GHG-reductions by sector is provided below for informational purposes to provide context for the specific components of Mitigation Measure GHG-1.

#### *Mobile Source Emissions*

The SBCAG 2040 RTP/SCS identifies that GHG emissions per capita from passenger vehicles are expected to decrease 13.3 percent in 2020 and 17.7 percent in 2035 from 2005 base year per capita emissions. As shown in Table 4.8-1, total operational mobile source emissions would be ~~9,224~~ 11,064 MT CO<sub>2</sub>e per year. Implementation of Mitigation Measure AQ-1 would reduce mobile source GHG emissions to the extent feasible. However, incoming produce would be

transported by trucks owned by local growers and growers from other regions and Baja. The project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies as mitigation for the proposed project. The project applicant would be required to comply with CARB's air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and transportation refrigeration units. As described in Section 4.3, *Air Quality*, Mitigation Measure AQ-1 would reduce operational mobile source emissions to the extent feasible, including mobile source GHG emissions. Mitigation Measure GHG-1 includes additional transportation demand program measures that may be available to further reduce operational mobile source GHG emissions.

[...]

### Significance After Mitigation

Project GHG emissions from mobile, area, energy, off-road (forklifts), waste generation, water consumption, and stationary equipment would be reduced through compliance with applicable local programs, project use of efficient technology, and project implementation of appropriate reduction measures to the extent feasible such as through the measures of Mitigation Measure AQ-1 and Mitigation Measure GHG-1. Mitigation Measure GHG-1 provides the project applicant a menu of options for specific GHG reductions, including on-site reductions through the use of renewable electricity, and off-site reductions through purchasing off-site reduction credits or carbon offsets. Additional on-site GHG emissions reductions could be achieved through use of renewable electricity, implementation of a transportation demand program, zero waste program, and use of electric construction equipment. Nonetheless, achieving the additional GHG reduction necessary to reduce the project's annual ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population GHG emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population would not be feasible. Quantifying potential reductions from these additional GHG reduction measures would be speculative due to uncertainty regarding the implementation of such measures. For example, without knowing the specific transportation policies that would be included in a transportation demand management program, or employees' response and engagement with the program, an accurate GHG emission reduction cannot be estimated. Similarly, the use of electric-powered construction equipment would be dependent on the availability of such equipment for project construction. Therefore, the on-site GHG reduction measures identified in Mitigation Measure GHG-1 have not been quantified to provide a conservative estimate of feasible on-site GHG emissions reductions. In addition, with the cap placed on the use of off-site measures such as reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), a 50 percent reduction from the project's ~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population would not reduce emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population.

As a result of the speculative nature of quantifying potential GHG emissions reductions that would be achievable by the project, as well as the magnitude of the project's exceedance of the County's adopted GHG emissions threshold (~~102.8~~ 109.6 MT CO<sub>2</sub>e per service population as compared to the County's significance threshold of 3.8 MT CO<sub>2</sub>e per service population), and the cap placed on the use of reduction credits and/or carbon offsets (no more than 50 percent of total GHG reductions), it is not possible to demonstrate that Mitigation Measure GHG-1 could feasibly reduce the project's emissions below the County's significance threshold of 3.8 MT CO<sub>2</sub>e per

service person per year. Therefore, the project's impact from GHG emissions would remain significant and unavoidable.

## **Response 6.4**

The commenter states that the Draft EIR should rely on the County of Santa Barbara's adopted CEQA thresholds included in the 2021 Environmental Thresholds and Guidelines Manual, rather than the SBCAPCD's air quality thresholds. The commenter also notes that the County's 55 pounds per day threshold applies to NO<sub>x</sub> and ROC separately, rather than NO<sub>x</sub> and ROC combined. The thresholds in Table 4.3-4, *Project Operational Emissions*, have been revised as described under Response 6.4. Section 4.3.3(a), *Methodology and Significance Thresholds*, has been revised as follows:

### *Operational Emissions Thresholds*

- As described in ~~SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents and in Environmental Review Guidelines~~ the Santa Barbara County's Environmental Thresholds and Guidelines Manual, a project would have a significant air quality effect on the environment if operation would:
  - Emit (from all sources, both stationary and mobile) more than ~~240~~ 55 pounds per day for ROC ~~and~~ or NO<sub>x</sub>, or more than 80 pounds per day for PM<sub>10</sub>.
  - Emit more than 25 pounds per day of NO<sub>x</sub> or ROC from motor vehicle trips only.
  - Exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk).

## **Response 6.5**

The commenter recommends including an additional measure in the list of standard dust control measures that would require the applicant to scheduling clearing, grading, earthmoving and excavation activities during periods of low wind to the extent feasible. The following language has been added to the list of standard measures included in Impact AQ-2:

- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized.

## **Response 6.6**

The commenter recommends that Mitigation Measure AQ-1 be revised to provide off-site options for mitigation of NO<sub>x</sub>, if feasible. The commenter recommends the lead agency consider whether specific mitigation measures related to regulating transport refrigeration unit (TRU) trucks entering the project site are feasible and enforceable. The commenter states that SBCAPCD would generally not have the ability to regulate mobile sources that are regulated at the state level and do not require a permit with SBCAPCD, and that compliance with monitoring of these measures would be the responsibility of the lead agency. The commenter recommends that these requirements be included as conditions of approval for the development and/or conditional use permit. The commenter also recommends correcting a clerical error in the reference to bullets a through f in Mitigation Measure AQ-1.

An offset mitigation program as recommended by the commenter is not considered feasible mitigation for the project's ozone precursor emissions. The County does not have an established off-site mitigation program for ozone precursors, and therefore a feasible and enforceable mitigation



measure for offset mitigation would not be possible. The text under describing the Significance After Mitigation associated with Impact AQ-3 has been revised as follows, to clarify this conclusion:

Implementation of Mitigation Measure AQ-1 would reduce mobile source NO<sub>x</sub> and ROC emissions to the extent feasible by providing infrastructure necessary to support zero-emission vehicles and equipment. The project can provide infrastructure to support zero-emission vehicles and equipment; however incoming produce would be transported by trucks owned by local growers and growers from other regions and Baja. The project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies as mitigation for the proposed project. Due to the project's limited control over other parties' truck fleets, the project could not feasibly reduce mobile source emissions by 90 percent, the amount required to reduce the project's NO<sub>x</sub> and ROC emissions below the applicable mobile source NO<sub>x</sub> and ROC threshold. In addition, the County does not have an established off-site mitigation program for ozone precursors, and therefore a feasible and enforceable mitigation measure for offset mitigation would not be possible. As a result, the potential impact of the project's operational emissions of NO<sub>x</sub> and ROC would be significant and unavoidable.

As stated in the Significance After Mitigation section of Impact AQ-1, the project applicant would have limited control of the composition of truck fleets, and it would not be feasible for the project applicant or County to require other parties to upgrade truck fleets to incorporate zero or near-zero emissions technologies as mitigation for the proposed project. Due to the project's limited control over other parties' truck fleets, the project could not feasibly reduce mobile source emissions by 90 percent, the amount required to reduce the project's NO<sub>x</sub> and ROC emissions below the applicable mobile source NO<sub>x</sub> and ROC threshold. As a result, the potential impact of the project's operational emissions of NO<sub>x</sub> and ROC remains significant and unavoidable.

The Conditional Use Permit that will contain the applicable conditions is described in the first paragraph of the Plan Requirements and Timing section. Mitigation Measure AQ-1 has been revised as follows:

**Plan Requirements and Timing.** The Conditional Use Permit shall require that the applicant report operational characteristics to Planning and Development staff annually, with the initial report due three months after initial project operation. Annual reports shall demonstrate to the satisfaction of the Planning and Development staff that improvements required by measures A through H are being implemented on an on-going basis.

If the project applicant applies for a stationary source air permit from the SBCAPCD, the applicant shall demonstrate to the satisfaction of Planning and Development staff that measures A through H are incorporated into the air quality permit requirements. ~~Upon issuance of the air quality permit, implementation monitoring of these measures may be transferred to SBCAPCD staff to streamline enforcement.~~

## **Response 6.7**

The commenter requests the Health Risk Assessment (HRA) included in the Air Quality and Greenhouse Gas Emissions Analysis Memorandum prepared by LSA (included as Appendix C to the Draft EIR) be updated to: include receptors along the property boundary to include the adjacent agricultural fields; use a flagpole height of 1.5 meters for all receptors; use the actual engine stack

parameters; use a worker adjustment factor of 4.2; and calculate the risk using the Hotspots Analysis and Report Program 2 (HARP 2).

LSA has prepared an updated analysis with the model adjustments as suggested by the commenter, which is included in Appendix C. Revisions to the model input did not result a change in the conclusions of the analysis. Table 4.3-5, *Health Risk from Diesel Fire Pump to Nearest Receptor*, has been revised as follows:

**Table 4.3-5 Health Risk from Diesel Fire Pump to Nearest Receptor**

	<b>Carcinogenic Inhalation Health Risk in One Million<sup>1</sup></b>	<b>Chronic Inhalation Hazard Index<sup>2</sup></b>
Maximally Exposed Individual Resident	0.5	<0.1
Maximally Exposed Individual Worker	<del>0.3</del> 0.6	<0.1
SBCAPCD Significance Threshold	10.0	1.0
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>

<sup>1</sup> Represents the probability that an exposed individual will develop cancer (persons per million exposed).

<sup>2</sup> Hazard Index (HI) is a relative metric for the effect of substances on an organ or organ system. A hazard index of less than 1.0 will not likely result in health effects over lifetime exposure. A hazard index greater than 1.0 does not necessarily suggest adverse health effects are likely and is best described as indicating that there is potential for adverse irritation to an organ or organ system.

Source: LSA Associates 2021 (Appendix C).

## Response 6.8

The commenter recommends that Mitigation Measure GHG-1 include implementation of any feasible local GHG reduction projects as an option to achieve the necessary GHG reductions. The following sentence has been added to Mitigation Measure GHG-1 to emphasize the focus on local activities if this measure is undertaken by the project:

- Directly undertake or fund activities that reduce or sequester GHG emissions (“Direct Reduction Activities”) and retire the associated “GHG Mitigation Reduction Credits.” A “GHG Mitigation Reduction Credit” must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB’s most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation* (CARB 2013). An “Approved Registry” is an accredited carbon registry that follows approved CARB Compliance Offset Protocols. As of April 2021, Approved Registries include American Carbon Registry, Climate Action Reserve, and Verra (CARB 2018b). Credits from other sources shall not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CARB standards. If the project applicant chooses to meet some of the GHG reduction requirements through Direct Reduction Activities, the activities shall be implemented as feasible in order of County preference: (1) within the County of Santa Barbara; (2) within the SBCAPCD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States. In the event that a project or program providing GHG Mitigation Reduction Credits to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring GHG Mitigation Reduction Credits specific to the registry involved and shall undertake additional direct investments to recoup the loss.

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<p>To: Rachel Raynor, AICP Associate Planner RRM Design Group 10. E. Figueroa Street, Suite 200 Santa Barbara, CA 93101</p>	<p>From: Dennis Lammers, PTP Senior Transportation Planner Derek Rapp, T.E. Principal Traffic Engineer</p>
<p>File: 20426126301</p>	<p>Date: November 18, 2021</p>

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**Reference: Arctic Cold Agricultural Processor and Freezer Project**

Stantec reviewed the Transportation section of the DEIR (June 2021) and Appendix L – Traffic and VMT Studies prepared for subject project, along with the DEIR comments memorandum prepared by RRM (August 13, 2021). Stantec also visited the project area and observed traffic conditions. This memorandum outlines our comments on the DEIR, which supplement RRM's comments on the DEIR.

**Summary**

Review of the information contained in DEIR *Section 4.13.3 Transportation and Circulation – Impact Analysis* and Appendix L indicates that additional operational analysis of Betteravia Road and the Betteravia Rd/Rosemary Rd intersection is warranted. The data provided appears to be insufficient to adequately evaluate roadway and intersection operations under existing and future conditions with and without the project. Peak travel periods, vehicle classifications, vehicle speeds, intersection geometry and delay should be analyzed in more detail, as discussed in this memorandum.

The DEIR should include an evaluation of alternative project access via Rosemary Road. Initial review of operational conditions on Betteravia Road and consideration of project generated (truck) traffic additions, suggests that access via Rosemary Road would provide operational and safety benefits compared to the proposed access via driveways along Betteravia Road.

**Stantec Review**

*DEIR Section 4.13.3 Transportation and Circulation – Impact Analysis.*

- CEQA Threshold 2 (VMT): The statement that “Overall, the proposed facility would reduce operational VMT because local agricultural operations are currently transporting produce to more distant freezer and processor facilities” does not appear to be supported by data. The new facility will likely attract inbound produce truck trips from local and more distant sources, and the facility may result in longer outbound truck trips.

The employee VMT is calculated using the SBCAG model. The model calculates home-based work (HBW) VMT for the traffic analysis zone (TAZ) where the site is located and compares the VMT to County average HBW VMT. This is the correct approach, however, these VMT models typically do not account for truck VMT for industrial/agricultural uses.

**Reference: Arctic Cold Agricultural Processor and Freezer Project**

- CEQA Threshold 3 (Increase in hazards): The statement that “impacts would be less than significant” is not based on any substantial evaluation. The DEIR Section does not include an operational or safety analysis of Betteravia Road and the Betteravia Rd/Rosemary Rd intersection. The introduction of WB 65 and STAA trucks turning onto a rural roadway that serves a mix of agricultural and industrial (oil services) traffic with 55mph speeds could generate operational and/or safety impacts.

7.3

*Revised Traffic and Circulation Study (ATE, July 21, 2020).*

- Existing Intersection Operations: Counts for the Betteravia Rd/Rosemary Rd intersection were collected from 6am - 9am (peak hour from 6am - 7am) and from 4pm - 6pm (peak hour from 4pm – 5pm). Peak agricultural traffic typically occurs before 4 pm and therefore the analysis may not have analyzed the true PM peak hour on Betteravia Road. It is noted that the project’s work shift starts at 6am and ends at 3pm.

7.4

The levels of service for the Betteravia Rd/Rosemary Rd intersection were calculated using HCS software (two-way stop control) and based on the combined average delay of both approaches of Rosemary Road and the left-turns from Betteravia Road. While this method is considered acceptable by County staff, it can under report the delay on the stopped approaches. An intersection can be considered to operate at LOS C average delay, while one of the stopped approaches may operate in the LOS E/F range with substantial delays, indicating operational deficiencies that may require mitigation. Such excessive delays can also indicate potential safety issues due to drivers attempting to enter the major roadway with shorter than usual gaps in traffic.

- Project-Specific Analysis: Trip estimates were calculated using operational data provided by the applicant. It is assumed that the statistics were approved by County staff, and Stantec cannot verify the accuracy of the data.

7.5

The facility’s main work shift starts at 6am and ends at 3pm, likely similar to the surrounding agricultural uses. The project trip generation tables only include peak hour trips that would be generated in the 6am - 7am period and the 5pm – 6pm period. This approach omits trips generated before 6am and before 5pm. Given that the morning peak hour on Betteravia Road may start before 6am and the afternoon peak hour likely may start at 3pm, the trip generation calculation approach may be insufficient.

It is noted that trip generation estimates were developed for a similar Arctic project in Oxnard based on ITE rates for High Cube Cold Storage Warehouse, which yielded significantly more trips compared to the trip generation estimates based on operational data in this traffic study. Review of the ITE land use description however indicates that it should not have been used, as the land use does not apply to agricultural produce storage, rather to storage of manufactured goods.

- Cumulative Analysis: Cumulative traffic forecasts for Betteravia Road were developed using the County’s approved and pending development list. Near-future developments include the Mid Coast Cooling facility, which is expected to resume operations. Given that the facility is located on Rosemary Road south of the project, it is expected to add commute and truck traffic to the Betteravia Rd/Rosemary

7.6

**Reference: Arctic Cold Agricultural Processor and Freezer Project**

Rd intersection. It does not appear that traffic generated by this facility was included in the cumulative forecasts.

- **Site Access and Circulation:** The site access discussion provides a level of service analysis using HCS software (one-way stop control) for the proposed two driveway connections to Betteravia Road assuming full access and widening of Betteravia Road to provide one 12-foot lane in each direction and a 14-foot median two-way left-turn lane along the project's frontage. The site access discussion should include an operational analysis of Betteravia Road and the potential impacts of WB 65 and STAA trucks turning onto a rural roadway that serves a mix of agricultural and industrial (oil services) traffic with 55 mph speeds. An alternative site access evaluation should include access from Rosemary Road and truck turning movements at the controlled Betteravia Rd/Rosemary Rd intersection, along with potential improvements for the intersection.

7.6  
cont'd

7.7

## Letter 7

**COMMENTER:** Dennis Lammers; Stantec

**DATE:** November 18, 2021

### Response 7.1

This comment is introductory and states the comments supplement RRM's comments on the EIR (Letter 5), which were submitted on behalf of Central City Cooling. The commenter summarizes their review of the EIR Section 4.13, *Transportation and Circulation*, and Appendix L to the EIR, which includes the *Arctic Cold Storage and Packing Project Impact Study* (Arctic Cold TIS) prepared by ATE and the *Arctic Cold VMT Analysis*, prepared by Fehr & Peers. The commenters specific comments on the EIR and Appendix L are responded to in Response 7.2 through Response 7.7.

### Response 7.2

The commenter states that the EIR conclusion that the proposed facility would reduce operational VMT is not supported by the data, and that the facility would attract produce truck trips from local and more distant sources, and would result in longer outbound trips. The commenter notes that employee VMT is calculated using the SBCAG model, which does not account for truck VMT for industrial/agricultural uses.

As discussed in Response 5.13, the project would be consistent with the requirements of Land Use code 35-42.040.B.1.d, which specifies the facility would not primarily import beyond 25 miles of the County boundary. The portion of produce coming into the processor facility would be timed with off-season needs to supplement local produce that would be the primary import, and is not anticipated to exceed 10% of the produce processed at the facility.

As discussed in Response 5.9, the VMT analysis for transportation impacts follows the County Guidelines that state that employment projects should analyze VMT using an efficiency metric (i.e., on a per employee basis) rather than based on absolute VMT. As stated in the County Guidelines, non-VMT transportation metrics and threshold questions apply to an entire project, including potential impacts from commercial and passenger vehicles traveling to and from the facility. Impact T-2 accurately states that the proposed facility would reduce operational VMT because local agricultural operations are currently transporting produce to more distant freezer and processor facilities. The VMT analysis used to determine transportation impacts of the proposed project considers the home-based work VMT per employee and reflects all passenger vehicles (cars and light duty trucks) assigned on the roadway network. While not applicable to the VMT analysis, truck travel demand for transporting produce during peak harvest season locally and from imported products is considered in the Arctic Cold TIS and in the other relevant components of the Draft EIR including air quality and GHG emissions analysis.

As discussed in Response 5.11, the VMT analysis utilized the SBCAG RTDM. The version of the SBCAG RTDM applied to the project was developed for the Fast Forward 2040: SBCAG RTP/SCS (SBCAG 2017). The SBCAG RTDM is a four-step travel demand model that estimates the trip generation, trip distribution, mode choice, and trip assignment for land uses in Santa Barbara County. The SBCAG RTDM can be used to forecast travel demand generated by a proposed project and the resulting trip matrices can be used to track the origin and destination of trips by trip type to calculate the home-based VMT generated by the project on a daily basis. Since the County's VMT impact thresholds are based on this version of the SBCAG RTDM, applying it to the project VMT analysis ensures that a

consistent methodology is being used to determine potential VMT impacts in comparison to the County's VMT thresholds.

### **Response 7.3**

The commenter states that the EIR conclusion that the project would not result in significant transportation hazards is not based on substantial evidence, and states that the addition of trucks turning onto a rural roadway could result in operational and/or safety impacts. The project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment) is discussed in Impact T-3 in Section 4.13, *Transportation and Circulation*., which summarizes analysis prepared by ATE (Appendix L) and reviewed for consistency with County policy by the County Transportation Division.

As discussed in Impact T-3, the project's frontage improvements would include widening Betteravia Road to provide a separate right-turn lane at both of the driveways. Frontage and driveway improvements would be designed pursuant to Santa Barbara County standards and would be reviewed for consistency with applicable County standards by the County Transportation Division. The applicable County standards have been developed to account for heavy truck traffic and anticipated traffic volumes. The driveway widths would comply with emergency access standards and be reviewed by the Santa Barbara County Fire Department for consistency with applicable fire safety codes and emergency access requirements.

### **Response 7.4**

The commenter states that intersection traffic counts may not have analyzed the correct PM peak hour at Betteravia Road and Rosemary Road under existing conditions. The commenter states that the levels of service for the Betteravia Road/Rosemary Road intersection were calculated using Highway Capacity Software (HCS) software, which can under-report the delay in stopped approaches, resulting in operational deficiencies and potential safety issues.

As discussed in Response 4.1, new traffic counts were conducted for the Arctic Cold TIS at the Betteravia Road/Rosemary Road intersection which is maintained by the County (refer to discussion on page 7 of the Arctic Cold TIS in Appendix L). The traffic counts were conducted by National Data & Surveying Services. As requested in a November 23, 2020 letter submitted by Caltrans in response to the NOP, the morning traffic counts were completed from 6:00 AM to 9:00 AM to capture the earlier morning peak hour that is experienced at the interchange. New PM peak hour counts were also conducted at the Betteravia Road/Rosemary Road intersection from 4:00 PM to 6:00 PM which corresponds to the peak afternoon commute period. The highest one-hour period was then identified for the traffic analysis consistent with traffic engineering standards.

The HCS was utilized to calculate the AM and PM peak hour levels of service for the Betteravia Road/Rosemary Road intersection. The HCS, which has been historically used by the County for LOS analyses, implements the methods and procedures documented in the HCM. It performs both planning and operational level analyses for surface streets, including intersections, freeways, and arterials. The underlying HCS model utilizes industry standard traffic engineering methods and has been developed following a peer review process both at the research level and TRB committee level for HCM adoption.

## Response 7.5

The commenter states that Stantec cannot verify the accuracy of trip estimates provided by the applicant. The commenter states that trip generation tables only include peak hour trips in the 6:00 AM to 7:00 AM period and the 5:00 PM to 6:00 PM period, which may not correspond to the actual morning or afternoon peak hour. The commenter notes that trip generation estimates prepared for a similar project in Oxnard used different trip rates, but that those rates should not have been used for that project.

As discussed in Response 5.10, the peak harvest season trip generation estimate was developed based on detailed operational data regarding the number of field trucks, warehouse trucks and employees that would travel to the facility on a daily basis. The trip generation estimates developed based on the operational data were also verified using the data presented in the Institute of Transportation Engineers Trip Generation Manual which showed a comparable trip generation estimate of 1,603 ADT (see Appendix L Table 4). The trip generation analysis reviewed the project's forecasted trips between the hours of 6:00 AM to 9:00 AM during the morning period and from 4:00 PM to 6:00 PM in the evening period. The highest 1-hour trip generation periods for the Project (6:00-7:00 AM and 5:00-6:00 PM) were then determined in order to present a "worst-case" assessment of project-added traffic. The traffic generated by the project was then added to the highest 1-hour volumes counted at the intersections to evaluate future operations. This is the standard traffic engineering approach and conforms to the recommended practices in the ITE Trip Generation Manual.

The commenter's statement regarding trip generation rates for a similar project in Oxnard are noted; however, as the commenter acknowledges, the referenced trip generation rates (ITE Trip Generation Rates for High Cube Cold Storage Warehouse) are not applicable to the proposed project because they do not apply to agricultural produce storage.

## Response 7.6

The commenter states that traffic from the Mid Coast Cooling facility was not included in the cumulative traffic forecasts, but that this facility is expected to resume operations.

The cumulative analysis in the traffic study was completed using the most current lists of approved and pending projects located in the County and City that were available when the EIR commenced, as required under CEQA. ATE has reviewed traffic generated by the Mid Coast Cooling facility using similar methods to those employed in preparation of the Arctic Cold TIS and confirmed that addition of traffic generated by the Mid Coast Cooling facility would not change any of findings of the Arctic Cold TIS (the study-area roadways and intersections would continue to operate acceptably under cumulative conditions with the traffic generated by the facility).

## Response 7.7

The commenter states that the site access discussion should include an operational analysis of Betteravia Road and the potential impacts of trucks turning onto a rural roadway that serves a mix of agricultural and industrial traffic with 55 mph speeds. The commenter states that an alternative site access evaluation should include access from Rosemary Road and truck turning movements at the controlled Betteravia Road/Rosemary Road intersection, along with potential improvements for the intersection.

The County Transportation Division staff and the project applicant's design team coordinated to develop the improvements required on Betteravia Road to safely accommodate project access. These improvements include:



- Location and spacing of driveways on Betteravia Road to be consistent with the County's engineering design standards and provide sufficient off-sets to the Central City Cooling driveway on the north side of Betteravia Road;
- Widening Betteravia Road to include a 14-foot center left-turn along the entire project frontage to accommodate left-turns into the site as well as into the properties located on the north side of Betteravia Road;
- Widening the south side of Betteravia Road to provide a 5-foot shoulder and a 5-foot bike lane that would provide a deceleration area for trucks turning into the project driveways; and
- Design of the project driveways to accommodate truck turns to and from Betteravia Road.

An alternative of providing access to the project from Rosemary Road was not considered because the project development area is not contiguous to Rosemary Road. Instead, the project applicant's design team worked with County Transportation Division staff to develop the required improvements on Betteravia Road for project access that meet the County's engineering design standards, including the spacing of driveways on the north and south sides of Betteravia Road. As noted, the required improvements for Betteravia Road include a 14-foot center left-turn and widening along the south side to provide a 5-foot shoulder and a 5-foot bike lane (the 10-foot shoulder/bike lane would provide a deceleration area for trucks turning into the project driveways).