

Appendix A

Notice of Preparation

Notice of Preparation

Notice of Preparation

To: _____ From: _____

(Address) (Address)

Subject: Notice of Preparation of a Draft Environmental Impact Report

_____ will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (is is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to _____ at the address shown above. We will need the name for a contact person in your agency.

Project Title: _____

Project Applicant, if any: _____

Date _____ Signature  _____

Title _____

Telephone _____

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Project Description

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.

Project Applicant

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

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

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 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 site. Figure 1 shows the regional location of the project site, while Figure 2 shows the project site and subject property in the local context.

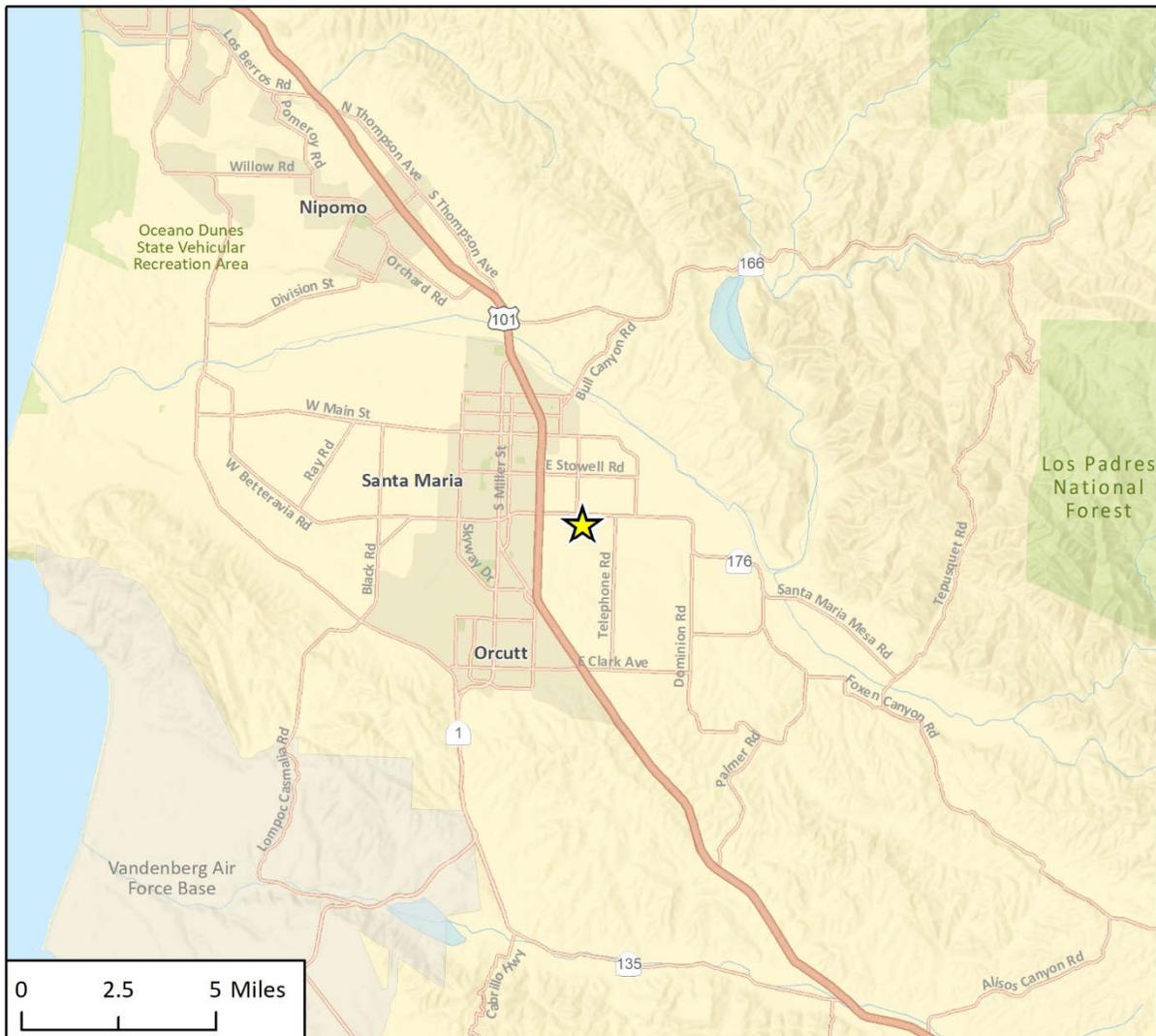
Existing Site Characteristics

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.

County of Santa Barbara
Arctic Cold Agricultural Processor and Freezer Project

Figure 1 Regional Project Location



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★ Project Location

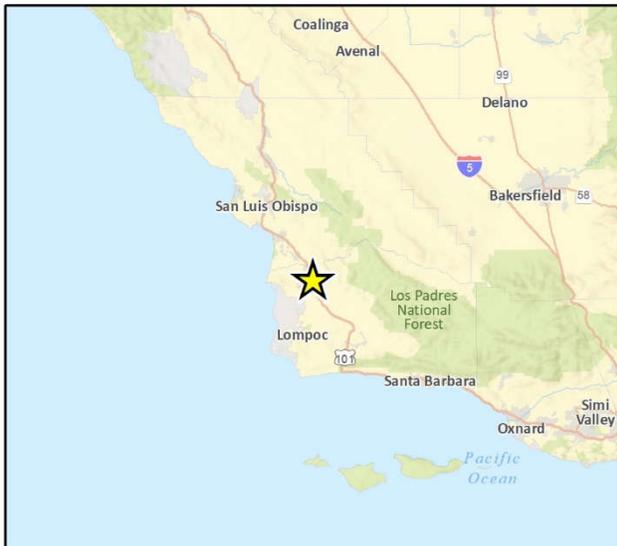


Fig. 1 Regional Location

Figure 2 Project Site Boundary and Disturbance Area



Imagery provided by Microsoft Bing and its licensors © 2020.

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).

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.

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.

Proposed Site Plan

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

Facilities Operations

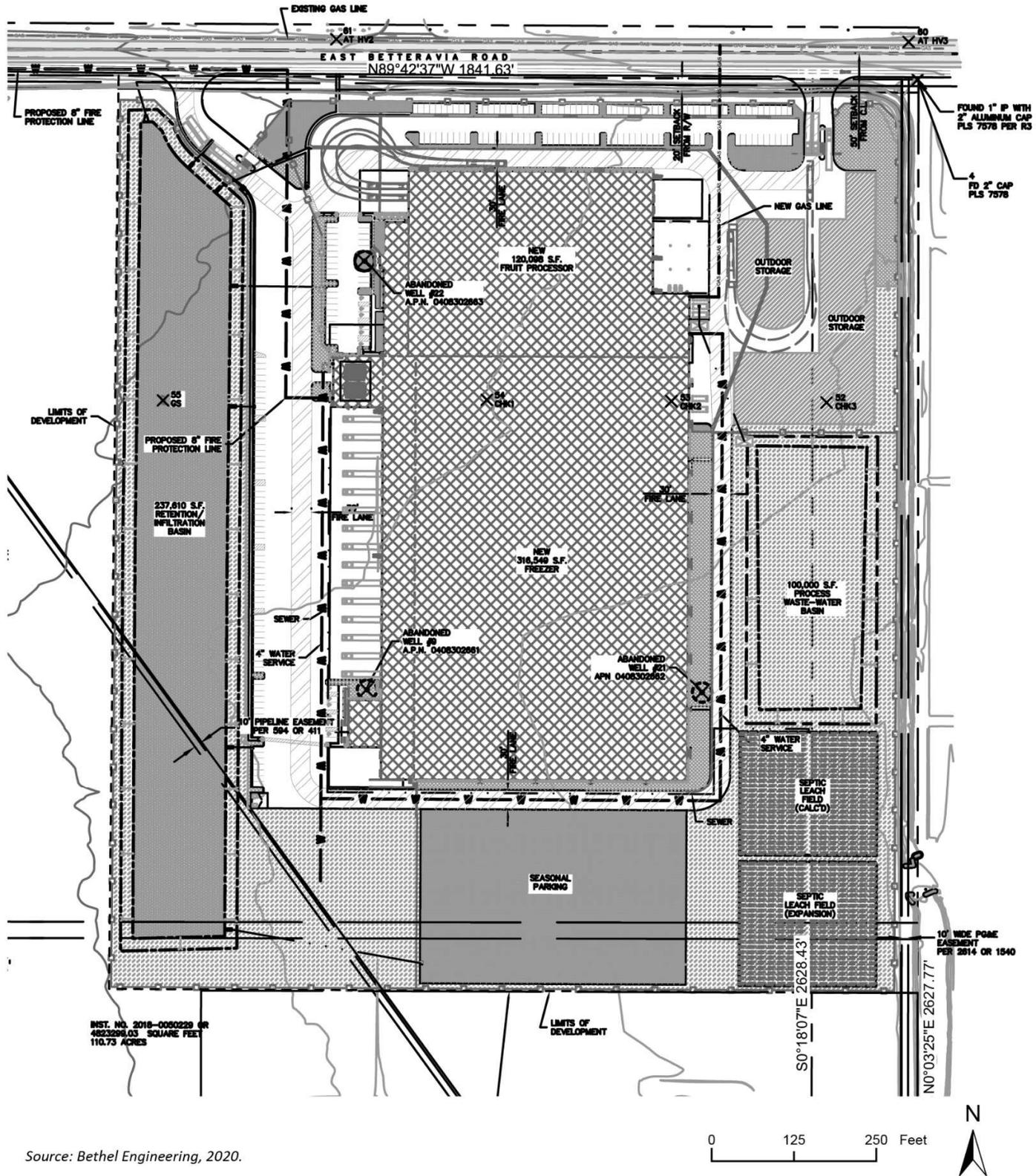
The processor facility would receive produce from local growers as well as from other regions throughout California and Baja California, Mexico for processing. Processing includes slicing, dicing, freezing, adding sugar and other ingredients, and making purees and puree concentrates pursuant to client 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. 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.

Circulation

Access to and from the project site would be from East Betteravia Road. 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

Figure 3 Project Site Plan



Source: Bethel Engineering, 2020.

Figure 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.

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 will be included in the Environmental Impact Report (EIR) for the project. 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.

Table 1 Project Characteristics

Address	1750 East Betteravia Road
APNs	128-097-001 (99.0 acres) and 128-097-002 (9.8 acres)
Height/Stories	
<i>Processor</i>	41.1 feet from existing grade ¹ /45.2 feet from finish grade ²
<i>Freezer</i>	53.3 feet from existing grade ¹ /57.4 feet from finish grade ²
Lot Area	108.8 acres (subject property) 40.0 acres (project site)
Structural Gross Floor Area (including 1st and 2nd floors) for Processor	
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
Structural Gross Floor Area (including 1st and 2nd floors) for Freezer	
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
Total Processor and Freezer Operational Gross Floor Area	449,248 sf
sf = square feet	
1 300 ft above mean sea level (msl)	
2 Approximately 4 ft 2 in below existing grade, or 295 ft 10 in above msl. Totals may not sum exactly due to rounding.	

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.

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.

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.

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.

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_x Boilers; one 300 hp Miura low NO_x boiler; and four propane forklifts. All equipment associated with the freezer operation would be electric. A more detailed discussion of these project components will be included in the EIR for the project.

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.

Water Use

Water is currently used for existing agricultural production of approximately 90 acres of row crops, including strawberries and broccoli, on the project site. Using a conservative general value of 1.5 acre-

feet per year (AFY) of water used per day for broccoli (University of California Davis 2017) existing water use for onsite irrigation is estimated to be 163.5 acre-feet per year (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 approximately 60 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 result in an anticipated maximum water demand of approximately 277.5 acre-feet per year. The net incremental increase of water onsite from existing to proposed conditions would be approximately 158.5 acre-feet per year. 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 project would include installation of an 8-inch water line for fire protection purposes that would run along East Betteravia Road and connect to the existing City of Santa Maria 24-inch water main in Rosemary Road to provide water for emergency purposes, including fires, on the project site. The applicant would be required to contract with the City through an outside user's agreement to provide the necessary flows onsite to meet Santa Barbara County Fire Department standards.

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 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.

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 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.

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.

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);
- **Voluntary Merger** to merge APN parcel numbers 128-097-001 and 128-097-002;
- Petroleum Division and CalGEM on proposed **re-abandonment plans** (under the most current abandonment standards) for the three wells (Vincent 9, 21, and 22) within the project footprint;
- LUDC Section 34A-4(b) requires that an application for a **well construction permit** shall include a plot plan indicating the location of the well with respect to existing wells 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, the Regional Water Quality Control Board (RWQCB) would be a responsible agency for review of National Pollutant Discharge Elimination System (NPDES) permit requests. The County Flood Control District would be a responsible agency for review of a proposed detention basin system. The California Department of Fish and Wildlife (CDFW) would 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) would 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.



November 18, 2020

VIA EMAIL

Ms. Holly Owen
County of Santa Barbara
624 W. Foster Road Suite C
Santa Maria, CA 93455
howen@countyofsb.org

Dear Ms. Owen:

ARCTIC COLD AGRICULTURAL PROCESSOR AND FREEZER PROJECT NOTICE OF PREPARATION,
STATE CLEARINGHOUSE NO. 2020100453

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project, released October 23, 2020. CalGEM was previously provided with the preliminary project site plans by Mr. Dan Ringstmeyer of Buena Resources. CalGEM reviewed the site plans and identified three plugged and abandoned wells impacted by the development. A comment letter with recommendations and comments was sent to Mr. Dan Ringstmeyer on December 20, 2019 (Enclosure 1). CalGEM's recommendations and comments specified in Enclosure 1 are still applicable for this project and are provided for your consideration.

In follow-up communications, CalGEM provided Mr. Dan Ringstmeyer with comments and recommendations regarding the project's office location and rig access for well "Vincent" 9 (API 083-02661). The following is a summary of CalGEM's response for your consideration:

- CalGEM does not approve building permits but offers recommendations to local planning agencies.
- CalGEM recommends obtaining opinions from multiple rig companies regarding rig access requirements, taking into consideration this specific site and well construction.
- 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.

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.

Sincerely,

Patricia A. Abel
Coastal District Deputy

Enclosures

JM:ks

cc: Chrono / CEQA / CSWR / SCH / OLRA / Jan Perez/ Well File / dan-buena-res.com



December 20, 2019

VIA U.S. MAIL AND EMAIL

Daniel Ringstmeyer, Contractor
Buena Resources
P.O. Box 2040
Santa Maria, CA 93457-2040
dan@buena-res.com

Dear Mr. Ringstmeyer,

SANTA MARIA COLD STORAGE & PACKING, 1750 E. BETTERAVIA RD, SANTA MARIA, CA,
APN 128-097-001

The Division of Oil, Gas, and Geothermal Resources (Division) appreciates the opportunity to submit comments on the project referenced above (Project), received via email on December 11, 2019. The Division received a site map with oil wells plotted (Enclosure).

The Division's authority is set forth in Division 3 of the Public Resources Code (PRC), and Title 14 of the California Code of Regulations (CCR). PRC § 3208.1 establishes well re-abandonment responsibility when a previously plugged and abandoned well may be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, or geothermal wells.

The Division has reviewed the Project. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following information.

Our records indicate there are three known plugged and abandoned oil wells plotted where the Project is located. There are an additional five plugged and abandoned oil wells and two idle oil wells that plot outside of the Project area on the Project parcel.

The three wells listed below are in the Project area and are not plugged and abandoned to current Division requirements as prescribed by law. **The Division recommends the re-abandonment of the three wells (see table below and enclosure).** The record and approximate location for the above mentioned wells are available online at <https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>

December 20, 2019
 Daniel Ringstmeyer

Well	Status
Union Oil Company of California "Vincent" Well No. 9 API 083-02661 Abandoned: 01/26/1962	The record review process shows that the subject well is not plugged and abandoned consistent with current PRC and CCR requirements as of December 20, 2019. Based on well records: <ol style="list-style-type: none"> 1. Hydrocarbon zone plug is not to current standards (CCR § 1723.1). 2. Freshwater plug is not present (CCR § 1723.2). 3. Surface plug is not to current standards (CCR § 1723.5).
Union Oil Company of California "Vincent" Well No. 21 API 083-02662 Abandoned: 01/22/1962	The record review process shows that the subject well is not plugged and abandoned consistent with current PRC and CCR requirements as of December 20, 2019. Based on well records: <ol style="list-style-type: none"> 1. Hydrocarbon zone plug is not to current standards (CCR § 1723.1). 2. Freshwater plug is not present (CCR § 1723.2). 3. Surface plug is not to current standards (CCR § 1723.5).
Union Oil Company of California "Vincent" Well No. 22 API 083-02663 Abandoned: 02/01/1962	The record review process shows that the subject well is not plugged and abandoned consistent with current PRC and CCR requirements as of December 20, 2019. Based on well records: <ol style="list-style-type: none"> 1. Hydrocarbon zone plug is not to current standards (CCR § 1723.1). 2. Freshwater plug is not present (CCR § 1723.2).

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. 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.

December 20, 2019
Daniel Ringstmeyer

There are no guarantees a well abandoned in compliance with current Division requirements will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current standards have a lower probability of leaking in the future, however there is no guarantee that such abandonments will not leak.

The Division recommends that the exact location of the wells be determined. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division advises that the wells be inspected and tested for liquid and gas leakage prior to, or during development activities. The Division expects any wells found leaking to be reported to it immediately.

PRC § 3208.1 gives the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Failure to plug and re-abandon a well may result in enforcement action, including an order to perform re-abandonment well work, pursuant to PRC § 3208.1, and 3224. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. **The property owner** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. **The person or entity causing construction over or near the well** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. **The party or parties responsible for disturbing the integrity of the abandonment** - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the

December 20, 2019
Daniel Ringstmeyer

party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

To view PRC § 3208.1 in its entirety, please visit:
<https://www.conservation.ca.gov/index/Documents/DOGGR-SR-1%20Web%20Copy.pdf>

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring written approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other abandonment or re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR § 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e., casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. The Division 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.

As indicated in PRC § 3106, the Division has jurisdictional authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources, damage to underground oil, gas, and geothermal deposits, and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

If during development activities any wells are encountered that were not part of this review, a Division engineer in the Coastal District - Orcutt office is to be notified immediately, and an amended site plan with well casing diagrams for Division review shall be filed. After appropriate review, the District office will send a follow-up well evaluation letter to the property owner, applicant, and local permitting agency.

November 18, 2020
Ms. Holly Owen

December 20, 2019
Daniel Ringstmeyer

Thank you for considering the Division's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at DOGGRCoastal@conservation.ca.gov.

Sincerely,



Patricia A. Abel
Coastal District Deputy

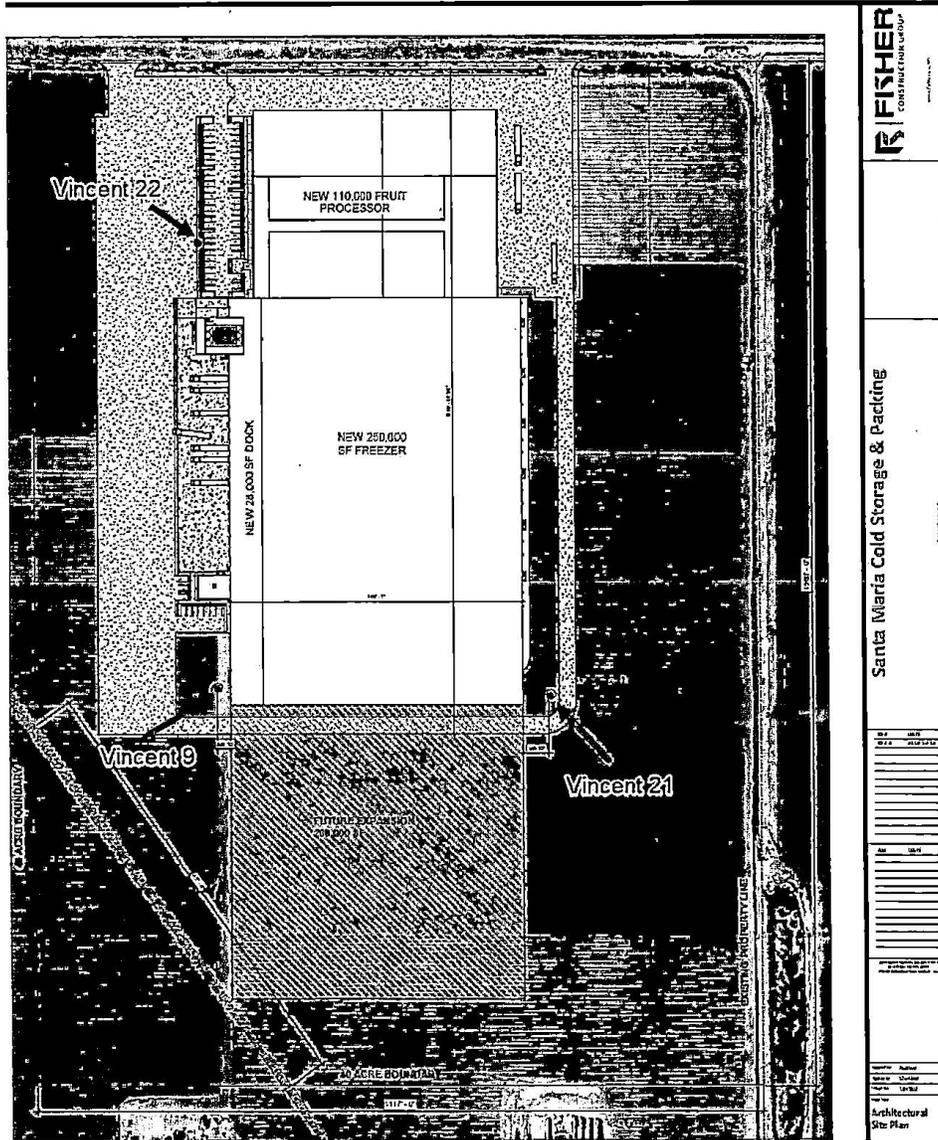
Enclosure

JM/kk

cc: Chrono ✓
Well File ✓
CSWR

December 20, 2019
Daniel Ringstmeyer

Enclosure – Annotated screenshot of site map received December 11, 2019.



DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5

50 HIGUERA STREET

SAN LUIS OBISPO, CA 93401-5415

PHONE (805) 549-3101

FAX (805) 549-3329

TTY 711

www.dot.ca.gov/dist05/

Making Conservation
a California Way of Life.

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

Ms. Holly R. Owen
November 23, 2020
Page 2

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.

Sincerely,



Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

Attachment

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
www.dot.ca.gov/dist05/



*Making Conservation
a California Way of Life.*

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.

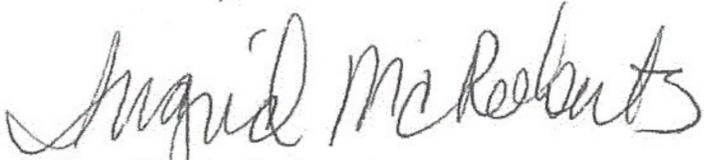
Caltrans previously reviewed the Draft Environmental Impact Report for this project and submitted the attached comment letter dated January 28, 2019 (Letter), which continues to apply to this project and its related CEQA documents.

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.

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.

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.

DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5
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FAX (805) 549-3329
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www.dot.ca.gov/dist05/



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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.

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.

Sincerely,



Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

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 6th 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 6th 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 6th 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.