

2 Responses to Comments on the Draft EIR

This section includes comments received during the circulation of the Draft Environmental Impact Report (Draft EIR) prepared for the 2045 General Plan Update.

The Draft EIR was circulated for a 30-day public review period that began on August 29, 2025 and ended on September 28, 2025. The City of Santa Maria received nine comment letters on the Draft EIR. The commenters and the page number on which each commenter’s letter appear are listed below.

Letter No. and Commenter	Page No.
1 John Roberts	2-1
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4 Emily Waddington, Santa Barbara County Air Pollution Control District	2-14
5 Lisa Plowman, Santa Barbara Planning and Development Department	2-19
6 Laurie Tamura, Urban Planning Concepts, Inc	2-29
7 Ken Hough and Jeanne Sparks, Santa Barbara County Action Network	2-163
8 Kelley M. Taber, Somach Simmons & Dunn	2-168
9 Chris Bjornstad, Caltrans District 5	2-183

The 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 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

| (805) 925 -0951 Ext. 2444

From: John Roberts <webmaster@rebelwithacause.com>
Sent: Tuesday, August 19, 2025 2:04 PM
To: Dana Eady <deady@cityofsantamaria.org>
Subject: Draft EIR Feedback

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Hi Dana,

Thank you for the Zoom meeting today for the Draft General Plan & EIR.

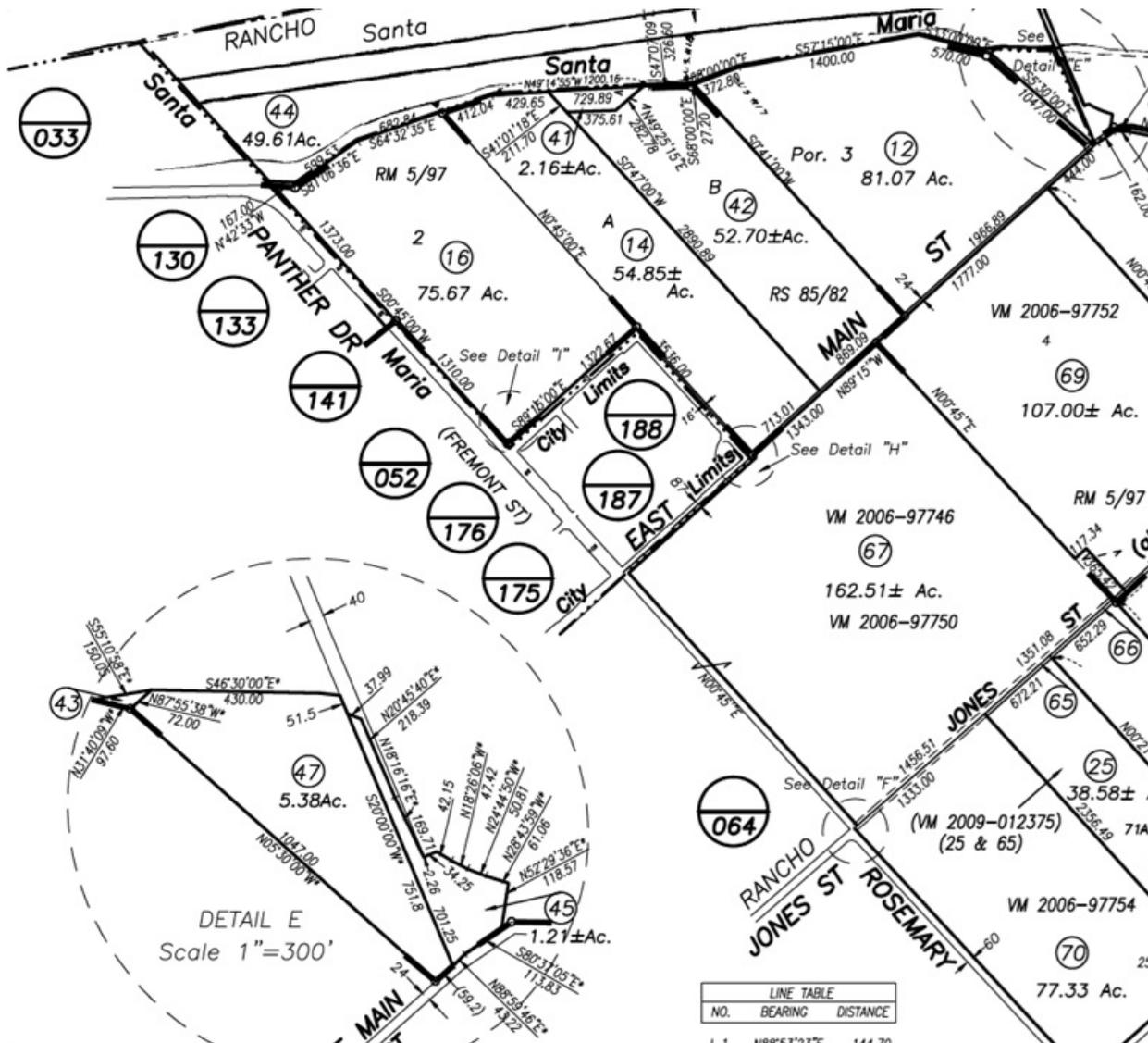
I noticed a couple possible discrepancies in the DEIR that may need to be corrected:

1. To not create a “county island”, there are two missing APNs (128-094-047 & 128-094-043) from the list for annexation in DEIR Section 2.6.3 pg. 2-9 and not highlighted in the map figure 2-5 pg. 2-12, which are both west and south of the city landfill and contiguously east of the included proposed parcel APN 128-094-012.

(See Detail E on county assessor map)

https://sbcassessor.com/assessor/maps_pdfs/128094.pdf

1.1



2. On DEIR pg 4.1-2 under Chapter heading "LAFCO and Farmland", the reference to "Section 1.5" should be changed to "Section 1.3".

1.2

Thank you,
John Roberts

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Letter 1

COMMENTER: John Roberts, Community Member

DATE: August 19, 2025

Response 1.1

The commenter states that APNs 128-094-047 and 128-094-043 are missing from the annexation list in Section 2.6.3 and from Figure 2-5, which could create a county island.

The City is including APN 128-094-047 in the annexation area. Final EIR figures and language have been updated as necessary to reflect this change. The addition of APN 128-094-047 into the annexation area does not change the environmental analysis or conclusions in the Draft EIR. APN 128-094-047 is a small area, 5.38 acres, compared to the overall annexation area, 985 acres, and has existing conditions similar to adjacent parcels, so its inclusion does not alter the scope or findings of the Draft EIR. APN 128-043 is already included in the city limits, and is therefore not a part of the annexation area but does not create a “county island” as it is not within county jurisdiction.

Response 1.2

The commenter states that on page 4.1-2 under the heading “LAFCO and Farmland” the reference to Section 1.5 should be corrected to Section 1.3.

The Final EIR has been revised to reflect the correct section reference. This correction does not affect the analysis or conclusions of the Draft EIR.

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Hi Dana,

I just discovered a third parcel (APN 128-094-045) that should be included for SOI/Annexation. It is also owned by the DeBernardi family, not the city according to <https://www.acrevalue.com/>.

Thank you,

John

From: Dana Eady <deady@cityofsantamaria.org>

Sent: Tuesday, August 19, 2025 2:09 PM

To: John Roberts <webmaster@rebelwithacause.com>

Subject: RE: Draft EIR Feedback

Hi John,

Thank you for this feedback. I will relay this information to the rest of the team here and we will look into it. Thank you for coming to the meeting today as well.

Have a good day,

Dana



Dana Eady, Planning Division Manager
Community Development Department
City of Santa Maria
110 South Pine Street Suite 101
Santa Maria, CA 93458
(805) 925 -0951 Ext. 2444

From: John Roberts <webmaster@rebelwithacause.com>

Sent: Tuesday, August 19, 2025 2:04 PM

To: Dana Eady <deady@cityofsantamaria.org>

Subject: Draft EIR Feedback

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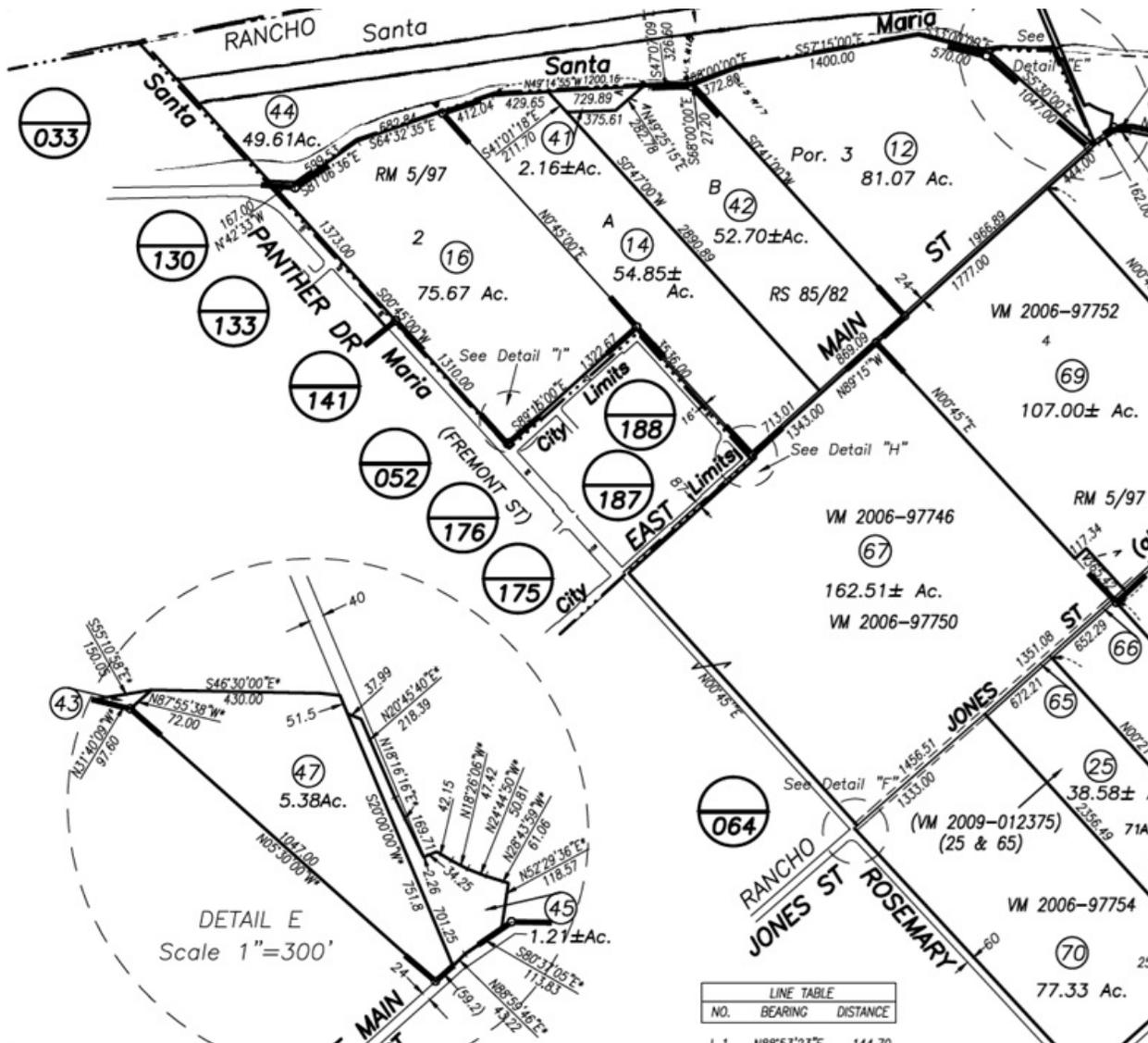
Thank you for the Zoom meeting today for the Draft General Plan & EIR.

I noticed a couple possible discrepancies in the DEIR that may need to be corrected:

1. To not create a “county island”, there are two missing APNs (128-094-047 & 128-094-043) from the list for annexation in DEIR Section 2.6.3 pg. 2-9 and not highlighted in the map figure 2-5 pg. 2-12, which are both west and south of the city landfill and contiguously east of the included proposed parcel APN 128-094-012.

(See Detail E on county assessor map)

https://sbcassessor.com/assessor/maps_pdfs/128094.pdf



2. On DEIR pg 4.1-2 under Chapter heading “LAFCO and Farmland”, the reference to “Section 1.5” should be changed to “Section 1.3”.

Thank you,
John Roberts

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Letter 2

COMMENTER: John Roberts, Community Member

DATE: August 19, 2025

Response

This comment is in addition to the commenter's previous email (identified herein as Letter 1). The commentor identifies an additional parcel, APN 128-094-045, that the commenter states should be included in the proposed SOI/annexation area and states it is owned by the DeBernardi family, not the City.

APN 128-094-045 is already included in the city limits, and is therefore not a part of the annexation area. No changes to the Draft EIR are required in response to this comment.

I am updating my previous email with more specifics that may explain the Some of the “missing” APNs and other possible updates to the DEIR regarding a City parcel.

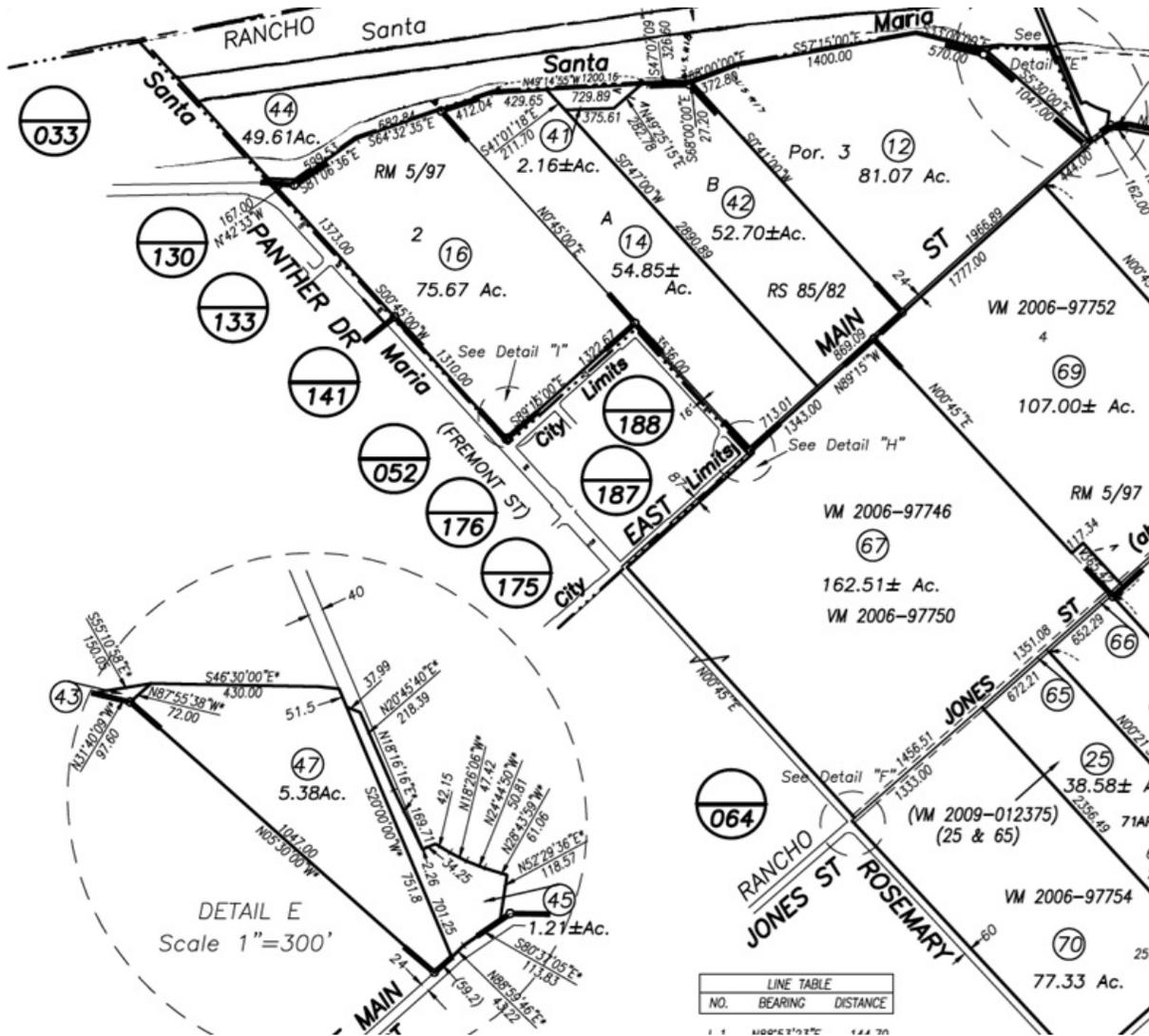
Thank you!

3.1

There seems to be three missing DeBernardi APNs 128-094-047, 128-094-043, 128-094-045, **AND** a possible City APN 128-094-041 from the list for annexation in DEIR Section 2.6.3 pg. 2-9 and not highlighted in the map figure 2-5 pg. 2-12, which are all west and south of the city landfill and east of the included proposed parcel APN 128-094-012, except the City parcel, which is north of 128-094-042.

(See Detail E on County Assessor Map)

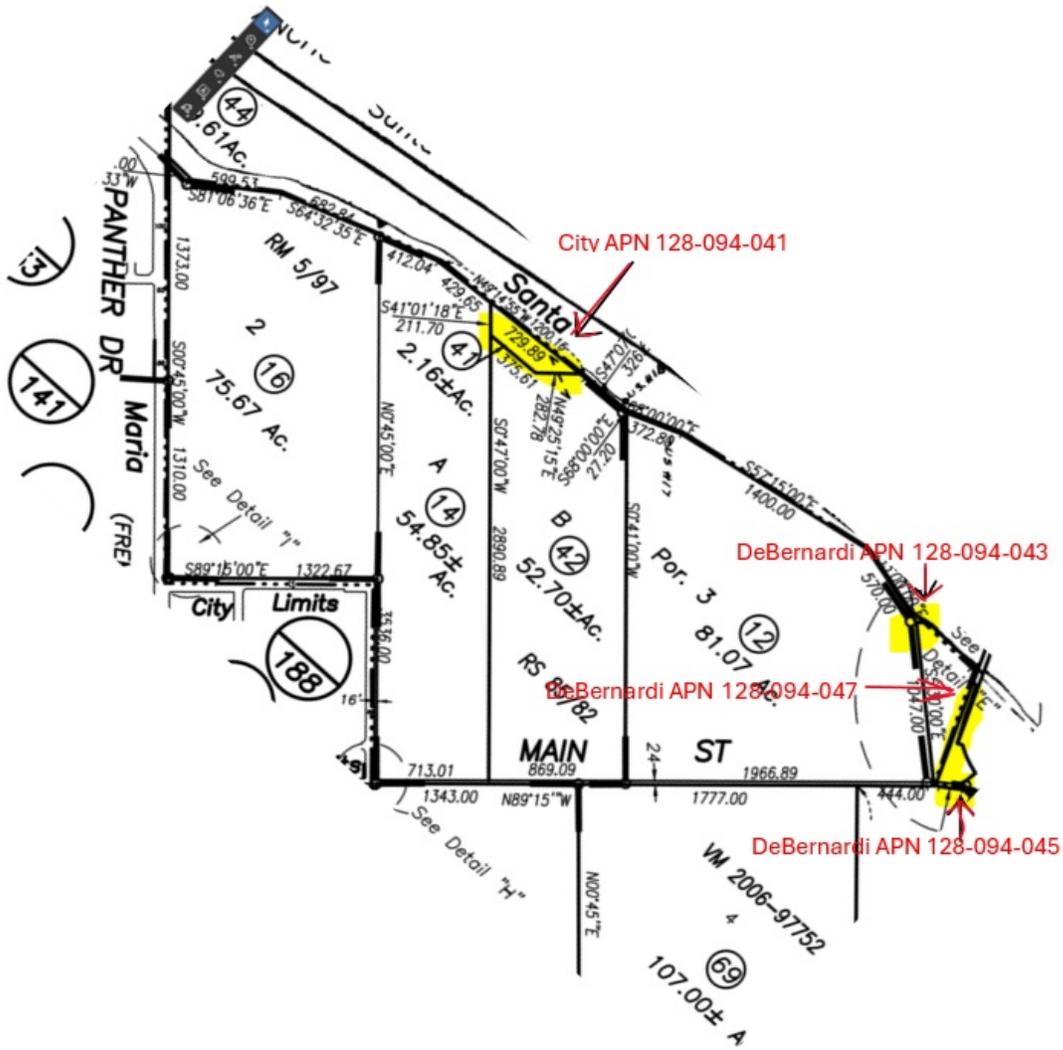
https://sbcassessor.com/assessor/maps_pdfs/128094.pdf



The City APN 128-094-041 was created from DeBernardi APN 128-094-042 and “swapped” with the City’s APN 128-094-045, now owned by the DeBernardi family.

The DeBernardi’s are in the process of doing a title search and possible chain of ownership for APN 128-094-043. This parcel may be resolved after the title search and may discover that the parcel number has been abandoned and the land has been absorbed by one or more the nearby parcels. The last tax year the DeBernardi’s were required to pay taxes for this parcel was 2008-2009.

3.2

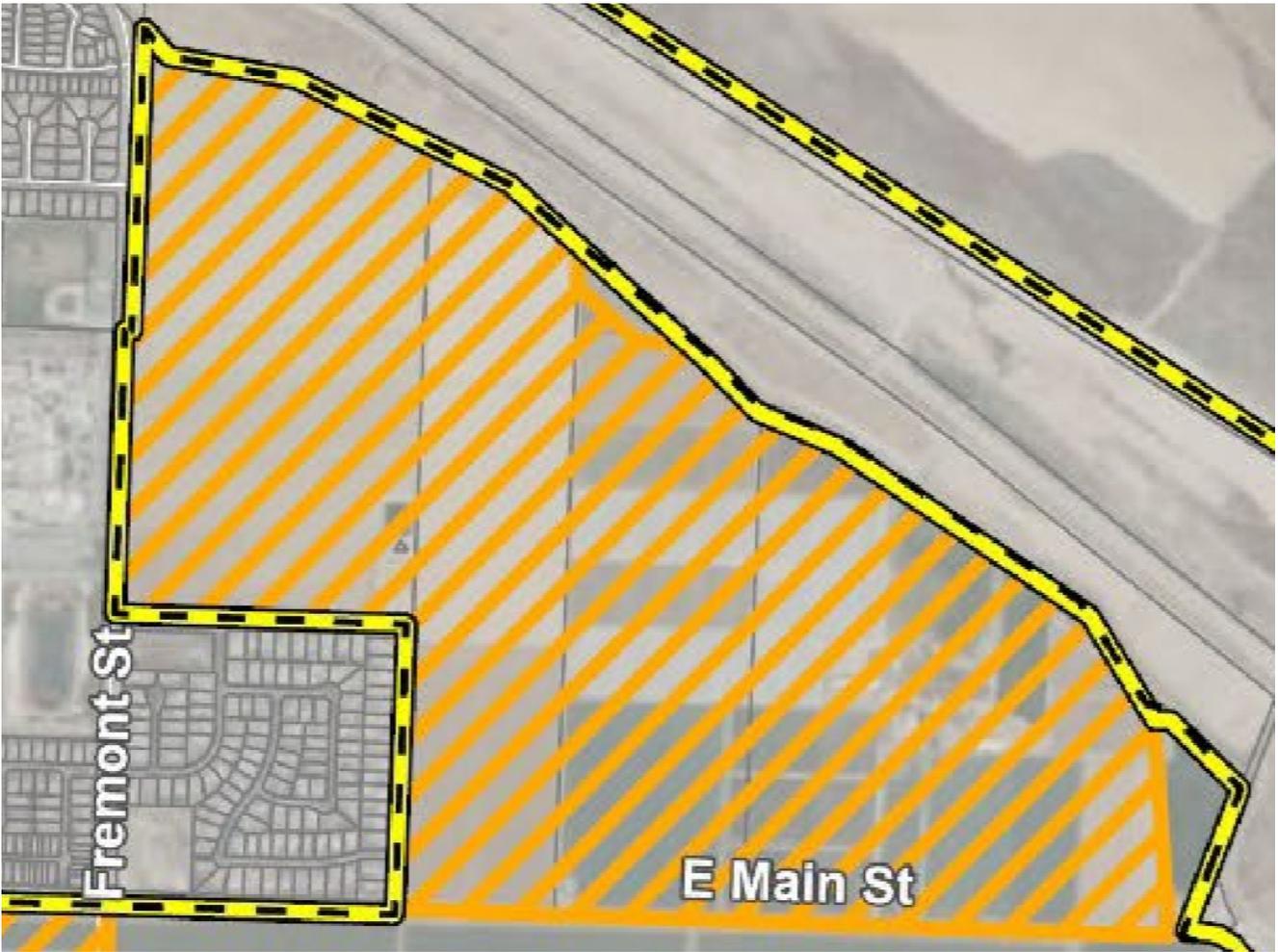


(Below is the relevant zoomed-in Proposed 2045 General Plan Annexation Area)

City APN 128-094-041 seems to be in the County, while DeBernardi APNs 128-094-043, & 128-094-045 seem to be within the SOI/City limits.

The DeBernardi family are in the process of doing a title search and possible chain of ownership for APN 128-094-043. This may be resolved as an abandoned parcel number that has been absorbed by one of the DeBernardi parcels as they have not needed to pay property taxes on that parcel number since the 2008-2009 tax timeline.

3.2



Thanks again Dana!

John Roberts

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From: John Roberts <webmaster@rebelwithacause.com>

Sent: Tuesday, August 19, 2025 7:32 PM

To: 'Dana Eady' <deady@cityofsantamaria.org>

Subject: RE: Draft EIR Feedback

Hi Dana,

I just discovered a third parcel (APN 128-094-045) that should be included for SOI/Annexation. It is also owned by the DeBernardi family, not the city according to <https://www.acrevalue.com/>.

Thank you,

John

From: Dana Eady <deady@cityofsantamaria.org>
Sent: Tuesday, August 19, 2025 2:09 PM
To: John Roberts <webmaster@rebelwithacause.com>
Subject: RE: Draft EIR Feedback

Hi John,

Thank you for this feedback. I will relay this information to the rest of the team here and we will look into it. Thank you for coming to the meeting today as well.

Have a good day,
Dana



Dana Eady, Planning Division Manager
Community Development Department
City of Santa Maria
110 South Pine Street Suite 101
Santa Maria, CA 93458
(805) 925 -0951 Ext. 2444

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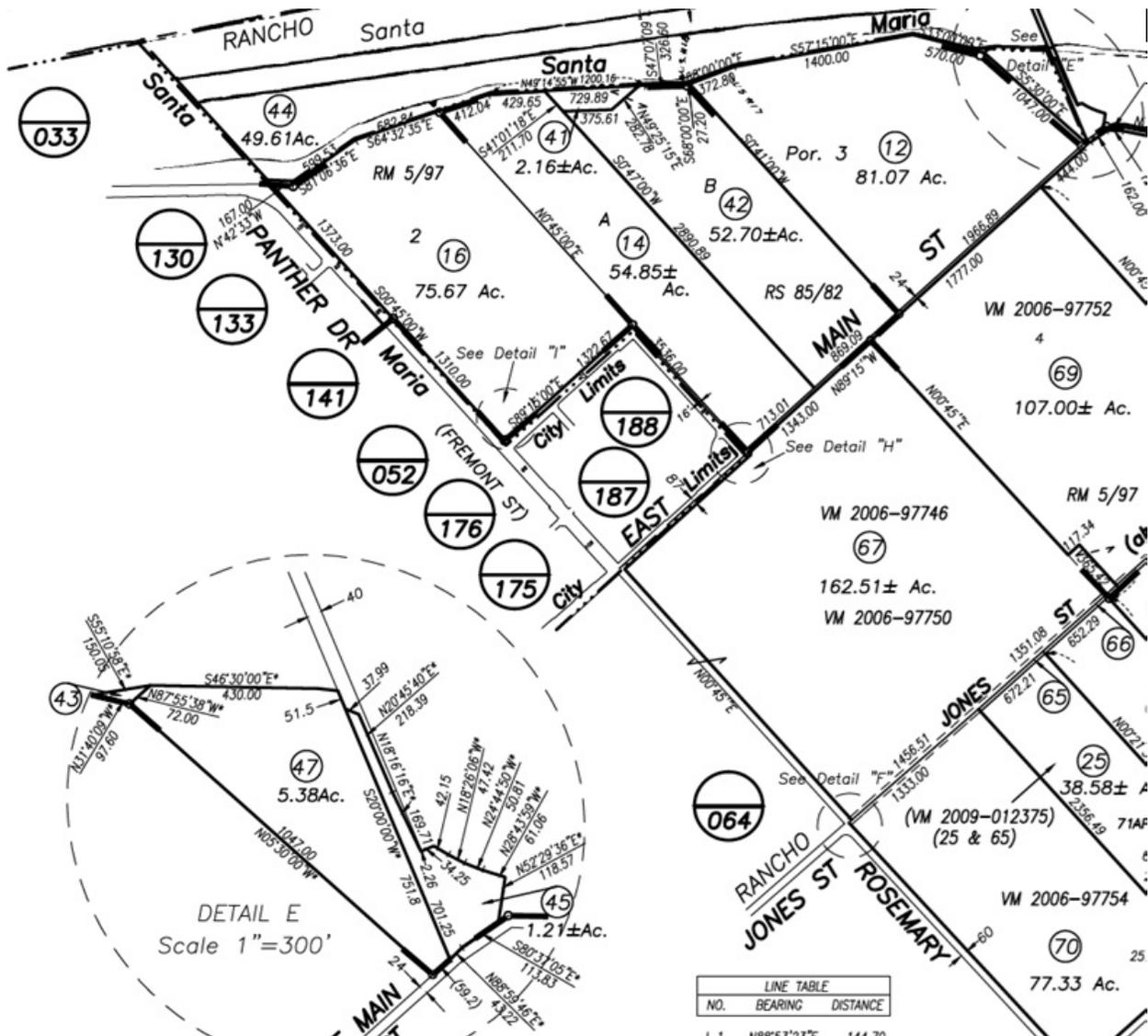
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John Roberts

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Letter 3

COMMENTER: John Roberts, Community Member

DATE: December 5, 2016

Response 3.1

The commentor states this email is an update to their previous email, this one includes more details and specifics to explain their concerns, including the previously mentioned “missing” APNs. The commentor states that four parcels (APNs 128-094-047, 128-094-043, 128-094-045, and 128-094-041) are missing from the annexation list in Section 2.6.3 and from Figure 2-5. These parcels are located west and south of the city landfill and east of APN 128-094-012, except APN 128-094-041, which is north of APN 128-094-042.

Refer to Response 1.1 and the Response 2.1 for a discussion of APNs 128-094-047, 128-094-043, and 128-094-045.

The City is including APN 128-094-041 in the annexation area. Final EIR figures and language have been updated as necessary to reflect this change. This parcel is a small area, 2.16 acres, compared to the overall annexation area, 985 acres, and has existing conditions similar to adjacent parcels, so its inclusion does not alter the scope or findings of the EIR.

Response 3.2

The commentor provides clarification regarding parcel ownership and history, noting that APN 128-094-041 was created from APN 128-094-042 and swapped with APN 128-094-045, which is now owned by the DeBernardi family. The commentor also states that a title search is underway for APN 128-094-043, which may reveal the parcel number has been abandoned and absorbed into adjacent parcels, with the last tax payment recorded in 2008–2009.

This comment provides the City with additional information about the parcel ownership and history, but does not recommend revisions to the Draft EIR. Therefore, the additional information provided by the commentor does not change the environmental analysis or conclusions of the Draft EIR.



September 25, 2025

Dana Eady
Community Development Department
City of Santa Maria
110 South Pine Street, Suite 101
Santa Maria, CA 93458

Sent Via Email: deady@cityofsantamaria.org

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the City of Santa Maria 2045 General Plan Update, SCH #2025020584

Dear Dana Eady:

The Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the City of Santa Maria 2045 General Plan Update, which will guide growth and development of the City through 2045. The update will help the City plan for important community issues such as community growth, housing, mobile and infrastructure needs, climate change, and environmental protection. The Plan would change some land use designations and amend two existing specific plans, the Entrada Specific Plan and the Area 9 Specific Plan. Additionally, three areas totaling 985 acres east of the city limits would be annexed and a new land use designation, Planned Annexation, would be established that allows for a mix of commercial, residential, industrial, and public land uses. The Plan provides the framework for development of up to 16,140 net new dwelling units and 1,504 net new acres of non-residential uses including 452 acres of mixed uses, seven acres of industrial/airport uses, 33 acres of public and open space, and 1,012 acres of specific plan and planned annexation areas, with a reduction in 462 acres of commercial uses.

4.1

1. **Impact AQGHG-2 Classification After Mitigation:** *Mitigation Measure AQGHG-2 Project-Level Air Quality Analysis and Mitigation* requires that a project with emissions that exceed air quality thresholds must “implement all feasible mitigation measures to reduce emissions to below thresholds,” yet the EIR classifies the impact as “significant and unavoidable.” Since this mitigation measure would reduce any significant impact to a less than significant level, the City should consider if an impact classification of “less than significant after mitigation” is more appropriate for this impact.

4.2

2. **AQGHG-3 Construction Equipment Exhaust Control Measures:** This measure requires off-road heavy-duty diesel engines used during construction to meet CARB-certified Tier 3 or higher emission standards or employ CARB-certified Level 3 diesel particulate filters. The District’s strongly encourages the City to revise and strengthen this measure to align with the District’s current recommendations for control of diesel exhaust and minimization of construction-related TAC exposure impacts. Namely we request the measure be revised to require the following:

4.3

- a. Off-road diesel equipment 25 horsepower (hp) or greater shall be equipped with engines compliant with, or certified to meet or exceed, CARB’s Tier 4 Final engine emissions standards. Where available, off-road construction equipment should be zero-

emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Commitments to Tier 4 and/or zero-emission equipment shall be included in applicable bid documents, purchase orders, and contracts; successful contractors shall demonstrate the ability to supply the compliant construction equipment for use prior to ground-disturbing and construction activities.

4.3

- b. All portable generators shall be powered by a source other than diesel fuel or gasoline (i.e. battery, natural gas, propane etc.).

- 3. **Action COS-5.2.3:** This action on page 4.2-24 specifies “collaborate with SBCAPCD to monitor pesticide residues in the air and enforce pesticide use and storage regulations.” The District does not have regulatory authority over the use or storage of pesticides. We recommend that the General Plan and EIR discussion is updated to cite the appropriate regulatory authority.

4.4

- 4. **CalEEMod Trip Rates:** *Appendix B CalEEMod Outputs* shows that there are no trip rates entered for the modeled land uses, and only vehicle miles traveled (VMT) were modeled in CalEEMod to quantify the mobile emissions from the proposed land uses. This omission underestimates the project’s mobile emissions as the trip rates are used for the calculation of vehicle starting exhaust and evaporative emissions. To properly assess mobile emissions from the proposed land uses, the CalEEMod analysis should be updated to include trip rates of the proposed land uses. Using default trip rates is acceptable, as project-specific trip rates are not known at this time.

4.5

We hope you find our comments useful. Please contact me at (805) 979-8334 or via email at WaddingtonE@sbcapcd.org if you have questions.

Sincerely,



Emily Waddington,
Air Quality Specialist
Planning Division

cc: Planning Chron File

Letter 4

COMMENTER: Emily Waddington, Air Quality Specialist with Santa Barbara County Air Pollution Control District

DATE: September 25, 2025

Response 4.1

The commenter summarizes the scope and purpose of the General Plan Update.

This commenter's summary does not provide new information about the Draft EIR analysis or recommend changes to the Draft EIR. Therefore, no further response is required.

Response 4.2

The commenter suggests the City consider reclassifying Impact AQGHG-2 as less than significant with implementation of Mitigation Measure AQGHG-2.

Mitigation Measure AQGHG-2 requires project-level air quality analysis and mitigation that would reduce criteria pollutant emissions but cannot ensure all future projects will be capable of feasibly reducing emissions below Santa Barbara County Air Pollution Control District's (SBCAPCD) adopted thresholds of significance due to project-specific variability. Consistent with CEQA Guidelines Section 15126.4, the impact analysis concludes this impact would be significant and unavoidable for the 2045 General Plan Update. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 4.3

The commenter recommends edits to Mitigation Measure AQGHG-3 (Construction Equipment Exhaust Control Measures) to align with the Santa Barbara County Air Pollution Control District's current best practices.

Mitigation Measure AQGHG-3 and the subsequent discussion of this impact's significance after mitigation have been revised in the Final EIR to incorporate SBCAPCD's requested language, as follows:

Mitigation Measures

AQGHG-3 Construction Equipment Exhaust Control Measures

For individual discretionary and ministerial residential projects facilitated by the 2045 General Plan Update that would develop three or more units; would involve demolition, mass grading, or excavation and trenching phases longer than two months; and would be located within 1,000 feet of existing sensitive receptors, the City shall enforce a project specific Condition of Approval requiring the following: off-road heavy-duty diesel engines to meet CARB-certified Tier 3 or higher emission standards or employ CARB-certified Level 3 diesel particulate filters to the extent that this equipment is commercially available. "Commercially available" shall be defined as the availability of required equipment in geographic proximity to the project site and within a reasonable timeframe relative to critical path construction timing. If Tier 3 or higher emission standard equipment or Level 3 diesel particulate filters are not commercially available, documentation shall be provided by the project applicant to the City stating that Tier 3

~~equipment or higher emission standard or Level 3 diesel particulate filters are not commercially available with supporting evidence from the contractor. If CARB-certified Level 3 diesel particulate filters are utilized, they shall be kept in working order and maintained in operable condition according to manufacturer's specifications, as applicable.~~

- a. Off-road diesel equipment 25 horsepower (hp) or greater shall be equipped with engines compliance with, or certified to meet or exceed, the California Air Resources Board's Tier 4 Final engine emissions standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas, liquefied natural gas, or propane should be utilized to the maximum extent feasible when zero-emission is not available. Commitments to Tier 4 and/or zero-emission equipment shall be included in applicable bid documents, purchase orders, and contracts; successful contractors shall demonstrate the ability to supply the compliant construction equipment for use prior to ground-disturbing and construction activities.
- b. All portable generators shall be powered by a source other than diesel fuel or gasoline (i.e. battery, natural gas, propane etc.).

Significance After Mitigation

Mitigation Measure AQGHG-3 would reduce potential residual health risk impacts associated with exposure of sensitive receptors to substantial pollutant concentrations of DPM and TACs. Implementation of Mitigation Measure AQGHG-3 would require construction projects that may be a substantial source of health risk exposure to sensitive receptors to utilize Tier 3 equipment or higher emission standard or Level 3 diesel particulate filters to the maximum extent feasible align with the District's current recommendations for control of diesel exhaust and minimization of construction-related TAC exposure impacts, which reduce potential construction-related TACs exposure impacts to a less than significant level.

This revision does not alter the significance conclusion for construction-related air quality and greenhouse gas (GHG) impacts.

Response 4.4

The commenter points out that Action COS-5.2.3, under the General Plan Update's proposed Policy COS-5.2, Agricultural air pollutant emissions, incorrectly assigns pesticide use and storage enforcement authority to SBCAPCD, which does not have that authority, and recommends listing the correct regulatory agency instead.

The City has revised Action COS-5.2.3 in the 2045 General Plan Update to clarify that pesticide use and storage are regulated by the California Department of Pesticide Regulation and the Santa Barbara County Agricultural Commissioner's Office. The discussion of Action COS-5.2.3 has been revised in the Final EIR for consistency with this revision in the 2045 General Plan Update. This revision does not change the environmental analysis or conclusions of the Draft EIR.

Response 4.5

The commenter recommends including trip rates in the CalEEMod analysis.

The VMT-based approach used in the Draft EIR is consistent with SB 743 and CEQA Section 15064.3 for program-level analysis. Regional mobile emissions are estimated using VMT. Consistent with the

State CEQA Guidelines and SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents (2022a), project-specific trip data would be used for transportation analysis during future project-level environmental review. No revisions to the Draft EIR are required in response to this comment.



COUNTY EXECUTIVE OFFICE
 Mona Miyasato, County Executive Officer
 Tanja Heitman, Assistant County Executive Officer
 Wade Horton, Assistant County Executive Officer

September 26, 2025

Attn: Dana Eady, Planning Division Manager
 City of Santa Maria Community Development Department
 110 South Pine Street, Room 101
 Santa Maria, CA 93458

Email: deady@cityofsantamaria.org

Re: Draft Environmental Impact Report for the City of Santa Maria General Plan Update

Dear Ms. Eady:

Thank you for the opportunity to review and comment on the City of Santa Maria General Plan Update Draft Environmental Impact Report. At this time, the County submits comments from the Santa Barbara County Planning & Development Department.

5.1

If you should have any questions, please do not hesitate to contact my office directly or Lisa Plowman, Planning and Development Director at (805) 568-2086.

Sincerely,

Clare Tobin
 Legislative Analyst

cc: Lisa Plowman, Director, Planning and Development Department
 Zoë Carlson, Senior Planner, Planning and Development Department

Enclosures: Santa Barbara County Planning & Development Department Letter, dated September 26, 2025





Planning and Development

Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

September 26, 2025

Attn: Dana Eady, Planning Division Manager
City of Santa Maria Community Development Department
110 South Pine Street, Suite 101
Santa Maria, CA 93458

Email: deady@cityofsantamaria.org

Re: Draft Environmental Impact Report for the City of Santa Maria General Plan Update

Dear Ms. Eady:

Thank you for the opportunity to comment on the above-referenced project. The Santa Barbara County Planning and Development Department (P&D) has reviewed the Draft EIR and requests that the City of Santa Maria (City) proceed with the environmentally superior alternative that achieves the City's stated goals for the Project and maintains consistency with City and LAFCO policies and standards mentioned in P&D's comment letter on the NOP, dated March 13, 2025 (attached), while avoiding unnecessary significant and avoidable environmental impacts and obviating the need to prematurely annex rural lands outside of the City limits.

5.1

The description for Alternative 2: Infill Only Alternative in the Draft EIR is as follows:

6.3.1 Description

Under the Infill Only Alternative, the City of Santa Maria would adopt the 2045 General Plan Update, including all goals and policies. However, the Infill Only Alternative would exclude the annexation of areas located east of the current City limits and direct development to areas within existing urban or suburban areas as infill, redevelopment, or increased densities. For the purpose of this analysis, the Infill Only Alternative is assumed to result in a similar overall level of buildout and population growth compared to the 2045 General Plan Update, despite the exclusion of future development in the eastern annexation area.

5.2



While this alternative would reduce the geographic footprint of development, it would result in increased development pressure on existing neighborhoods and infrastructure. As a result, the Infill Only Alternative may not fulfill the primary objectives of the 2045 General Plan Update because it would not fully address evolving community health needs, state housing requirements, or opportunities for connected growth anticipated through 2045. However, as discussed in detail in Section 6.3.2, this alternative would avoid environmental impacts in the annexation area, such as conversion of agricultural land, fragmentation of open space, or potential effects on biological resources, while potentially exacerbating environmental impacts associated with the increased development density in existing neighborhoods.

5.2

The description states the Infill Only Alternative may not fully address evolving health needs, state housing requirements, or opportunities for connected growth; however, there does not appear to be an analysis that substantiates this conclusion. As currently described, it is unclear whether this alternative would provide for development of existing agricultural and other open lands within the City's existing boundaries to meet state housing requirements, though the text seems to suggest that this alternative would preclude the conversion of any agricultural land. If necessary, this alternative could be strengthened to meet all stated objectives for the Project and maintain its status as the environmentally superior alternative if it included agricultural lands within City boundaries and its sphere of influence, in addition to the urban and suburban lands it currently identifies for development.

Section 6.5 *Environmentally Superior Alternative*, further demonstrates how the Infill Only Alternative meets the City's objectives while reducing potential environmental impacts:

Unlike the Greater Annexation Alternative, the Infill Only Alternative would concentrate development in already developed areas of the city by increasing densities and redevelopment. As a result, the Infill Only Alternative would have reduced impacts on agricultural lands, as this alternative would not include the annexation area, thus removing the potential for development to convert agricultural lands outside of the City limits. The Infill Only Alternative would also result in reduced impacts to air quality and GHG emissions, as infill development would encourage the use of active transportation and transit uses due to the proximity of services to residential development. Additionally, compared to the Greater Annexation Alternative, the Infill Only Alternative would have reduced impacts on biological and cultural resources due to the concentration of development within previously disturbed areas that have low potential for biological resources and low potential to uncover archaeological resources. The Infill Only Alternative would have reduced per capita VMT, as development within the infill areas would reduce buildout potential to a wider area, which would reduce mobile emissions in comparison to the Greater Annexation Alternative. Due to the reduced buildout potential

5.3

and reduced buildout area, impacts related to hydrology and water quality would also be reduced compared to the Greater Annexation Alternative.

5.3

Section 6.5 *Environmentally Superior Alternative*, also includes justification for not selecting the Infill Only Alternative; however, this justification does not appear to be substantiated and is discussed below:

Although the Infill Only Alternative would be the Environmentally Superior Alternative, this alternative would not fulfill the primary objectives of the 2045 General Plan Update, including the provision of housing quality and various housing choices or improving opportunities for connected growth.

The above statement is inaccurate as this alternative could fulfill the primary objectives of the 2045 General Plan Update including Housing Quality and Choice and Connected Growth. Both objectives are described below in italics:

5.4

Housing Quality and Choice. *Develop a high-quality and diverse housing supply at all levels of affordability that preserves Santa Maria as a place where families can establish roots and today's youth can afford to stay. Balance the growth of housing and the economy so that people can live and work in Santa Maria. As new housing types are introduced, (e.g., accessory dwelling units (ADUs), adapt parking, transportation, and other community features. Develop workforce housing solutions that provide safe, healthy, and comfortable homes for workers and their families.*

According to the Draft EIR, the Infill Only Alternative would result in a similar overall level of buildout and population growth through infill development. Therefore, the strategies discussed above for achieving housing quality and choice, including ADUs, can be achieved through infill development without annexation of rural agricultural lands.

Connected Growth. *To accommodate projected population, housing, and jobs growth, focus on improvements to existing neighborhoods along with infill and vacant site development. Expand beyond current City limits when needed, weighing the short and long term environmental, economic, infrastructure, public service, and fiscal trade-offs. Establish strong cultural, design, and physical connections between newly developed areas and the rest of Santa Maria.*

It is unclear how the Infill Only Alternative does not meet this objective as it emphasizes improvements to existing neighborhoods and infill development. It also emphasizes expanding beyond City limits when needed.

5.4

The Draft EIR contains additional justification for not selecting the Infill Only Alternative in Section 6.5 as follows:

Further, the Infill Only Alternative would not enhance new and existing neighborhoods such that each neighborhood would be a Complete Neighborhood or provide innovative housing and may result in the City failing to meeting its RHNA obligations in accordance with State law as it would significantly reduce the affordable housing options and limit new housing to infill only and redevelopment.

As mentioned above, the Infill Only Alternative could be strengthened if it considered development of agricultural lands within the City boundary and sphere of influence in addition to the proposed urban and suburban lands to meet its RHNA obligations, along with the incorporation of higher density residential development (e.g., up to 40 units/acre in residential zones) in order to increase affordable housing options. This would allow it to meet the goal of providing Complete Neighborhoods and maintain its designation as the environmentally superior alternative.

A modified Infill Only Alternative that includes agricultural lands within the City boundaries and within Santa Maria's sphere of influence would reduce substantial impacts to agricultural lands designated as important farmland. Table 4.1-1 *Summary of Important Farmland in the Plan Area and Annexation Areas* shows that of the 944 acres of land in the annexation areas, 803 are prime farmland, 7 acres are farmland of statewide importance, 134 acres are unique farmland and only 41 acres are not considered to be prime or unique farmland or farmland of local or statewide importance. This table also identifies 1,537 acres of grazing land within the City limits and sphere of influence, along with over 2,500 acres of prime farmland, unique farmland, and farmland of statewide importance. Therefore, there is greater opportunity for Complete Neighborhood development on farmland within the City boundary or sphere than the area proposed for annexation. Further, the Infill Only Alternative would reduce impacts to agricultural resources to a less than significant level whereas impacts under the proposed project would remain significant and unavoidable. The City should focus any proposed development of agricultural lands on areas within the City limits prior to consideration of additional areas for annexation.

5.5

In summary, and as stated in the attached P&D comment letter, the County encourages the City to fully utilize existing areas within the City before considering annexing agricultural land in the

rural area, with an approach that includes increasing the density of residential land use designations and seeking redevelopment opportunities within the existing city limits or development of urban agricultural lands within the City at appropriate densities to meet its needs. We also continue to encourage the City to coordinate with the County regarding sound regional growth strategies.

5.5

Please contact Zoë Carlson, Planner, in the Long Range Planning Division, at (805) 568-3532, or at carlsonz@countyofsb.org, if you have any questions.

Regards,



Lisa Plowman
Director, Planning and Development Department

Attachment:

1. Re: Notice of Preparation of an Environmental Impact Report for the City of Santa Maria General Plan Update

<G:\GROUP\COMP\Resp. Agency Review\RAR Projects by Agency\Cities & Counties\City of Santa Maria\Santa Maria GP Update\2025 Update\GP EIR NOP\PD Letter SM GP EIR NOP 3.12.25.docx>

Letter 5

COMMENTER: Lisa Plowman, Director of the County of Santa Barbara Planning and Development Department

DATE: September 26, 2025

Response 5.1

The commenter thanks the City for the opportunity to provide public comment and requests that the City proceed with the environmentally superior alternative (the Infill Only Alternative) which achieves the City's stated goals for the project, and maintains consistency with City and LAFCO policies and standards mentioned in the commenter's submitted comment letter on the NOP.

While the Infill Only Alternative is identified as the Environmentally Superior Alternative in the Draft EIR, due to its reduced environmental impacts, the City selected the 2045 General Plan Update as the preferred alternative as it would best meet the full range of project objectives, including housing quality and choice, connected growth, and infrastructure planning. The 2045 General Plan Update would provide for both infill development and annexation areas, which would allow for a greater range of housing types and locations, support planned infrastructure improvements, and accommodate projected population and employment growth identified in the plan. In contrast, the Infill Only Alternative limits development to existing urban areas, which would reduce overall growth potential and associated infrastructure planning opportunities. No revisions to the Draft EIR are required in response to this comment.

Response 5.2

The commenter summarizes the description of the Infill Only Alternative in the Draft EIR and opines that the reasoning for not adopting this alternative needs to be substantiated further.

Chapter 6, Alternatives, Section 6.3, Alternative 2: Infill Only Alternative, pages 6-6 through 6-9, of the Draft EIR explains that the Infill Only Alternative would not fully meet several of the 2045 General Plan Update's primary objectives, particularly those related to housing quality and choice, connected growth, and the provision of complete neighborhoods. This alternative would limit development to existing urban areas, which would reduce overall growth potential and opportunities for new housing types compared to the proposed plan. It also constrains the ability to plan for future infrastructure improvements beyond current city limits and may increase development pressure on existing neighborhoods. While the Infill Only Alternative offers some environmental advantages, the Draft EIR concludes that these limitations prevent it from achieving the full range of objectives identified for the 2045 General Plan Update. The Infill Only Alternative may also limit the City's ability to meet its Regional Housing Needs Allocation obligations and reduce opportunities for innovative housing solutions. Additionally, increased development pressure on existing neighborhoods and infrastructure could exacerbate localized environmental impacts and constrain the City's long-term growth strategy.

The commenter is correct that the description could be strengthened by clarifying whether agricultural lands within existing city limits could be developed under this alternative and how that might affect housing capacity. To address this, additional explanation has been added to Chapter 6, Alternatives, Section 6.3, Alternative 2: Infill Only Alternative, page 6-7, to clarify that the Infill Only Alternative would rely on redevelopment and increased densities within existing urban areas and

locations already designated for urban development. The Infill Only Alternative would not convert agricultural lands within city limits because the land use designations and zonings of lands within city limits currently used for agricultural purposes have been planned for urban redevelopment in specific plans or earlier iterations of the General Plan, and the potential impacts associated with the loss of agricultural resources were previously evaluated in the environmental review documentation for these long-range plans. For some properties within city limits that remain in crop production, this represents a transitional non-conforming use that is anticipated to be replaced with urban redevelopment during implementation of current specific plans and the General Plan.

As discussed in Section 4.1, *Agricultural Resources*, environmental documents such as the Sphere of Influence Expansion Environmental Impact Report (SCH #90010930), the Area 9 Specific Plan Environmental Impact Report (SCH #2008071018), the Blosser-Southeast Specific Plan Amendment Supplemental Environmental Impact Report (SCH #1994107909), and the Betteravia Plaza General Plan Amendment, Land Use and Zone Change and Development Agreement Environmental Impact Report (SCH #2015011029) have evaluated impacts to agricultural resources from the conversion of agricultural lands within the city. As a result, these lands have land use and zoning designations intended for urban redevelopment and would not be considered a conversion of existing agricultural uses.

The language within the analysis on pages 6.7 has been revised in the Final EIR to incorporate the following underlined language:

By accommodating a similar amount of development entirely within existing City limits, the Infill Only Alternative would avoid the annexation area's agricultural lands and result in reduced impacts to farmland. While the Farmland Mapping and Monitoring Program still designates areas within the city as Important Farmland, the conversion of these areas and associated land use changes have been previously evaluated in earlier environmental documents which are listed in Section 4.1, *Agricultural Resources*. Under this alternative, future growth would rely on redevelopment and increased densities within existing urbanized areas and locations already designated for urban development rather than expansion into agricultural lands. The Infill Only Alternative would not convert agricultural lands within city limits because lands within city limits currently used for agricultural purposes have been previously designated for planned urban redevelopment in specific plans or earlier iterations of the General Plan. As discussed in Section 4.1, *Agricultural Resources*, environmental documents such as the Sphere of Influence Expansion Environmental Impact Report (SCH #90010930), the Area 9 Specific Plan Environmental Impact Report (SCH #2008071018), the Blosser-Southeast Specific Plan Amendment Supplemental Environmental Impact Report (SCH #1994107909), and the Betteravia Plaza General Plan Amendment, Land Use and Zone Change and Development Agreement Environmental Impact Report (SCH #2015011029) have evaluated impacts to agricultural resources from the conversion of agricultural lands within the city. As a result, these lands have land use and zoning designations intended for urban redevelopment and would not be considered a conversion of existing agricultural uses. The exclusion of future development in the eastern annexation area would reduce impacts to agricultural resources in comparison to the 2045 General Plan Update. However, because this alternative limits development to infill sites, it would constrain opportunities for housing diversity and connected growth compared to the proposed plan. As the Infill Only Alternative would not result in the conversion of agricultural lands within City limits nor would it include the annexation area, this impact would be reduced to less than significant.

Response 5.3

The commenter summarizes text from the Draft EIR Alternatives Section and states the Infill Only Alternative would meet the City's objectives and reduce environmental impacts.

As discussed in Chapter 6, *Alternatives*, Section 6.3, *Alternative 2: Infill Only Alternative*, pages 6-6 through 6-9, of the Draft EIR, the Infill Only Alternative would concentrate development within existing city limits, thereby avoiding the conversion of agricultural lands in the eastern annexation area and reducing impacts on biological resources, air quality, and greenhouse gas emissions. These benefits led to its identification as the Environmentally Superior Alternative under CEQA. Please also refer to Response 5.2 above for a discussion on why the Infill Only Alternative was not chosen as the preferred alternative. No revisions to the Draft EIR are required in response to this comment.

Response 5.4

The commenter opines that the justification for not selecting the Infill Only Alternative was not substantiated in Section 6.5 of the Draft EIR. The commenter further opines that the Infill Only Alternative could fulfill the objectives for Housing Quality and Choice and Connected Growth of the 2045 General Plan.

Please refer to Responses 5.1-5.3 above for an explanation of the City's decision to move forward with the proposed project as opposed to the Infill Only Alternative. While the Draft EIR acknowledges that the Infill Only Alternative would implement the General Plan's goals and policies, the determination that it would not fully meet the plan's objectives reflects a broader planning consideration: that infill alone may not provide sufficient geographic flexibility or capacity to meet long-term housing and infrastructure needs. The commenter's preference for the Infill Only Alternative will be passed on to decision makers for their consideration.

Response 5.5

The commenter provides suggestions which they believe would strengthen the Infill Only Alternative and fulfill the goals of the Draft General Plan. The commenter also recommends allowing development of agricultural lands within the city limits and sphere of influence, combined with higher-density residential zoning (up to 40 units per acre). The commenter further encourages prioritizing redevelopment and increased density within existing city boundaries before annexing rural agricultural land and recommends continued coordination with the County on regional growth strategies.

As discussed in Chapter 6, *Alternatives*, Section 6.3, *Alternative 2: Infill Only Alternative*, pages 6-6 through 6-9, and in Responses 5.1-5.4 above, the Draft EIR concludes that the Infill Only Alternative may constrain the City's ability to meet its Regional Housing Needs Allocation obligations and provide innovative housing types due to its reliance solely on infill and redevelopment. However, as described in the Alternatives Technical Memoranda (see the City General Plan website: https://www.imaginesantamaria.com/_files/ugd/e3bef4_378ddb76d4224730a46da6a98aac8165.pdf), the Infill Only Alternative already assumes several land use changes to support new housing opportunities within city limits and its sphere of influence, including revisions to the Area 9 Specific Plan and increased densities (up to 35 du/ac) in High Density Residential zones, as well as new mixed-use designations along Main Street and Broadway corridors that would facilitate additional infill development.

The preferred land use alternative (as discussed in Chapter 2, *Project Description*) would facilitate infill development particularly along the Main Street and Broadway corridors similar to the Infill Only Alternative. The preferred land use alternative would also increase densities for residential development, and the new Corridor Mixed Use designation would allow for increased allowable densities within the city that would account for approximately 60 percent of new residential units. The annexation area within the preferred land use alternative would account for the remaining 40 percent of new residential units.

Changes within the Infill Only Alternative are intended to support a diverse housing supply and promote Complete Neighborhoods within existing City limits. However, the analysis found that even with these enhancements, the City would not fully address evolving community health needs, meet state housing requirements, or provide opportunities for connected growth anticipated through 2045. Therefore, annexation of adjacent rural agricultural land was determined to be the only feasible solution to meet long-term housing needs and ensure compliance with state housing requirements.

The commenter's suggestion to include agricultural lands within the city boundary and sphere of influence is acknowledged; however, this suggestion does not account for the City's existing land use plans and constraints. Many agricultural parcels within the city limits are designated as Primary Agricultural Open Space (AOS-1) or Secondary Agricultural Open Space (AOS-2), which are intended to preserve land for current and future agricultural production. These designations reflect long-term planning goals and community values, and conversion of these lands would be in direct conflict with the City's agricultural identity objective.

While increasing density and utilizing urban agricultural lands aligns with infill principles, the Draft EIR and supporting technical documents demonstrate that these options have already been explored and found to be insufficient. Ultimately, annexation of adjacent rural agricultural land was determined to be the preferred alternative by the City as it includes a feasible way to meet the City's housing needs through 2045 while balancing land use priorities.

September 27, 2025

Dana Eddy, Planner Manager
Community Development Department
110 S. Pine Street
Santa Maria, Ca 93454

RE: Comments on Draft EIR for General Plan Update

Dear Dana

Please find my comments on the Draft EIR for the General Plan Update attached. I hope that these comments and the information provided will help provide more detail and context to the future development of the City of Santa Maria.

Both the Draft General Plan Elements and the Draft EIR were released at the same time for a 45-day public review. This was a very heavy lift for the community to provide detailed comments in such a short period of time.

After review of both documents there are some core issues that need to be addressed before the General Plan is approved by the City Council and forwarded to LAFCO for the Sphere of Influence adjustment and future annexations.

1. **Annexation Area:** There is no information on how the annexation area will be developed with over 8,000 units and all the related development items such as commercial uses, schools, parks, roads, infrastructure. Without this information now it will be many years before these areas will be available for annexation and development.
2. **Future School Sites:** There is no information about how and where the 8 elementary schools, 3 new junior highs, and 2 new high schools are going to be located for the 16,140 new units. The current schools are already impacted and cannot absorb more students. Half of these schools will be in the infill area of the city and there is no land available for these schools!!! The city needs to set aside over 200 acres for future schools for the infill and the annexation areas or each of the existing school sites will need to have two and three story campus buildings. **This is a flaw in the plan.**
3. **Future Parks:** The current city policy is to have 5 acres per 1,000 residents. If the city is built out to 165,000 people by 2045 the city would need to have 825 acres of parkland to be consistent with this policy. That means all the annexation area will need to be park land with no development or the city needs to annex a whole lot more land in this process. Currently the city indicates that they have about 240 acres of parkland, but it is not clear if this includes the 20-acre sports field project. There is no new parkland identified for the infill of the city so where are the new parks to be located.
No where in these two documents does the city include discussion on the parks and trails at Los Flores which is more than 300 acres.??? There is also no information on how much

6.1

6.2

6.3

6.4

100's of acres of new parks will cost the city both in the acquisition, development or long-term maintenance of many new parks over the next 25 years. **The park policy needs to be substantially reduced to be realistic for the future.**

6.4

4. **Water and Wastewater Plans** There is no information about the many upgrades needed for water and sewer trucklines throughout the city. There is no information as to how the annexation area is going to be served for wastewater treatment. Is there going to be a new plant on that side of the city or how will the effluent be carried through what major trucklines across the city to the existing plant and how much expansion to the plant will need to be made to increase the plant by 50% and how much it will cost. **This information needs to be in the General Plan and the Draft EIR to validate that there is a feasible plan for the growth of the city.**

6.5

5. **Traffic Impact:** The traffic section of the EIR has no information on the 50% increase of traffic in the city of Santa Maria and the impacts to roadways and intersections. Some road sections will have 3 to 5 times as much traffic as currently experienced. Ironically the Noise section of the draft EIR has more information about traffic impacts than the traffic section. Table 4.6-8 reveals major impacts throughout the city. The bottom line is that the city either needs to **change the Policy to accept LOS F for most roadways or the city needs to identify** all the roadways and intersections that will need to be expanded and improved to maintain a LOS D. How much will these road improvements cost the city and the developers. Also, there is a map on the existing Circulation system within the city but there is no map on the new Circulation System.

6.6

6. **Los Flores Park and Landfill** There is no map or discussion in any of these documents on the 1,500 acres the city owns and what the plans are for this property. The plans were to have a 300-acre landfill for the future of the city of Santa Maria but that is not discussed in the Public facilities element or the EIR. On page 4.8-5 of the EIR the reference is that the city will be hauling trash to the Cold Canyon Landfill by 2034. WHY?

6.7

Also, there is no discussion in either document on the parks and trails and other amenities at Los Flores that the city has spent park and general fund money on. What are the plans for the future of this park and the rest of the land at Los Flores?

7. **Future environmental review** Throughout the EIR there are references to future projects needing additional environmental review. This is incorrect. Most of the housing projects that are part of this infill area will not need future environmental review, and it needs to be clear in each chapter that most housing projects are exempt. They will not need VMT studies, bio studies, noise studies, cultural resource studies. They may need infrastructure studies if the city does not do it.

6.8

Unfortunately, the annexation areas will need to have second level EIR's because the development plans for these areas were not included in this General plan update. So more time and money will be spent in the next five years to plan for these areas.

Please feel free to contact me if you have any questions on the attached comments.

Sincerely

Laurie Tamura, AICP
Principle Planner
Urban Planning Concepts, Inc

ES-1	4	The first sentence should have the elements listed in the order of state law. Throughout this document the reference should be in the order of state law. Should include Housing element in this list. Also the optional elements needed to be listed last
ES-1	6	Agricultural Identity needs to be revised to state: “Balance the needs of the existing city and the annexation areas while respecting the agricultural operations outside of the city sphere of Influence.”
ES-2	7	Connected Growth needs to be revised to state: To accommodate projected population, housing and job growth focus on improvements Including new schools, parks, and infrastructure to existing neighborhoods along with infill on vacant sites. At the same time balance the growth needed by annexing planned areas that will also include schools, parks, businesses and jobs.
ES-3	4	Alternatives: There is no Project Description listed here first. What is this EIR analyzing ?? Need to provide details on the growth hybrid plan of 8,000 units in the city and 8,000 units in the annexation area. also need to include details on how many schools are needed, how many parks, water, sewer, roads. Jobs etc.

6.9

6.10

6.11

		<p>Each of the three alternatives need the same details listed here. How many units etc....</p> <p>The determination of alternative 2 as the superior alternative is in error as there is no plan for anything but housing what about schools, parks, jobs, etc. and it does not meet the objectives for the future of the city.</p>	6.11
ES-3	5	The one controversy has been expansion of Santa Maria to included prime agricultural land in the annexations. Please revise this statement.	6.12
ES-5-26		There will be many comments on MM's in this document that will need to be revised in this table	6.13
Introduction			
1.1	1	Throughout this EIR and the General Plan update the date should be changed from 2045 to 2050. This will give the city a 25-year timeline before the GP needs to be updated again and it will have the d city go through three housing cycles.	6.14
1-1	2	<p>This paragraph needs a much longer review of the history of the city over the last 30 years since the Sphere of Influence and annexation project was approved by the City of Santa Maria. The 1993 plan studies the potential of 3,000 acres and resulted in the annexation of 2,000 acres with 10,000 units, schools, parks, jobs/housing balance.</p> <p>This history needs to be very detailed as this new GP update is following in the footsteps of the original annexation plan. Should include a map.</p> <p>This paragraph should be split in two after the word WRITTEN.</p>	6.15
1-1	4	<p>This should be a 2025 plan.</p> <p>The second sentence said that this is a blueprint for the city but there are no plans this is only a policy document and the blueprints will have to be done later project by project. Please rewrite this sentence and make it clear that the bullets listed here are not in this General Plan or EIR.</p>	6.16
1-1	Whole page	<p>There is no mention in the Introduction on the purpose of this EIR.</p> <p>This EIR is to study the Hybrid plan of 8,000 new infill units with schools, parks, jobs upgraded infrastructure and 8,000 new units in the annexation area with new schools, parks, jobs and infrastructure</p>	6.17

		to serve this new area. must include these numbers in every session of this EIR as this is what the GP with result in fo the city.	6.17
1-2	2	This should have been a full EIR on the infill and annexation for the future of the city. Doing a Programmatic EIR just means that almost all future projects will need to do their own ND or Full EIR. Many more documents will need to be done project by project in the future.	6.18
2-1	2	Revise paragraph per correct listing of elements and optional elements and also note that this GP should be 2050.	6.19
2-1	footnote	This footnote should be revised to indicate that any development within SOI can and will be processed by the city of Santa Maria for annexation to the city. The county would be a responsible agency regarding the annexation application. For example Richards Ranch was processed by the city.	6.20
2-2	Fig 2-1	This map needs to include the 1,500 acre Los flores property that the city owns and operates to the southwest of the Orcutt area. this site will eventually have a new 300 acre landfill.	6.21
2-4	1	<p>The linear portion of Santa maria is located on the east side not west side of U.S.101. Please correct.</p> <p>The internal farm The city owned service road go east to the City owned property where the water storage tanks are located along with communication towers and other city equipment.</p> <p>The city also owns and operates 1,500 acres of land known as Los Flores. This land includes parks and trails and, in the future, will be the new city landfill on about 300 acres. Add this information to this paragraph.</p> <p>The last sentence should be moved to the next paragraph</p>	6.22
2-4	2	Regional transit is provided also by SMOOTH and other medical and senior carriers. This should be noted throughout this EIR. Regional rail should also include the Santa Maria Valley Railroad into the city of Santa Maria. Make these corrections.	6.23
2-4	3	<p>Revised this paragraph</p> <p>The City of Sant Maria is characterized as a suburban residential community the largest city in Santa Barbara County.</p> <p>The next sentence is wrong as table LU-1 states the city is only 12,752 acres within the city limits. This sentence says that it is 15,058 acres...need to resolve the numbers.</p>	6.24

		Please note that most of the 4,500 acres of land are in the Oru cut area south of Santa Maria and is already almost fully developed. The next three sentences are incorrect and should be deleted.	6.24
2-4	4	Again this paragraph repeats incorrect acreage.	6.25
2-4	7	Identify the optional elements Public Facilities, Rec and Park and Econ Devel. These Elements are not required and could be deleted.	6.26
2-5	1	It is too bad that this update to the Zoning maps and Zoning Ordinance could not have been done at the same time as this 5 + year effort but understand since the GP Update did not include land use maps.	6.27
2-5	2	This paragraph should be revised as this GP Update is only a goals and policy document but there are no land use or zoning plans provided for the future. It does not show how the 8,000 units of infill are going to be built out and it does not show any plans for the Annexation Area. All of this planning work has been pushed off into the future. Please correct this,	6.28
2-5	6	Vision statement should include support of the expansion of VSFB	6.29
2-5	Bullet	Revise the Agricultural objective as noted in other sections. ES-1	6.30
2-7	All bullets	Revise order of the Elements per state law and list the optional elements at the end. List the housing element in the bullets with the information about when it was adopted.	6.31
2-7		Land Use designations ...the city needs to work on reducing the number of land use designations. There are too many and this is the time to reduce them. See comments provided for the Land Use Elements. Many cities are simplifying their land use and zoning ordinances	6.32
2-9	Bullet 2	Does this mean that the city is going to retire the Entrada Specific Plan since it is no longer being used?	6.33
2-9	Annexation	This whole section does not include the land uses and zoning to be planned for in this area. This area will include between 8,000 and 9,000 units, commercial at the interchanges, medical expansion, 6 new schools, 50 acres of parks and job creating uses. Need to provide these details in the EIR? Better, include a concept plan on how this area will be developed. Use the 1993 land use plan as an example. Delete the last phrase ...and public land uses in annexed lands. outside of the current city limits.	6.34
2-9	Noise	The maps in the Noise section are not correct as they do not include most of the sound walls that have been installed along 101 to reduce noise impacts on the community. These is a very big error that needs	6.35

		to be resolved in this section, Figure 2-6, the Noise Element and in this EIR	6.35
2-10	Fig 2-3	There are many errors in this map The land fill is not open Space???it should be CF Community Facility. The santa maria Cemetery is colored HDR-22 but it should be CF Airport land use designations are wrong. Area 7 is wrong. Betteravia plaza has new land use designations. There are no SP lands. This figure needs to be corrected.	6.36
2-11	Fig 2-4	Again, many errors. Most of them are listed above.	6.37
2-12	Fig 2-5	Need to include the eastern island that is not noted for annexation. This exhibit should have had a concept layout for 8,000-9,000 units and all of the other related uses need for this annexation area. at least the city could provide a list of needs for this buildout on this Figure	6.38
2-13	Fig 2-6	Rive and correct this map based on the existing sound walls along 101, there is no way that these contours impact half of the city. Also, there are many other projects with sounds walls that have reduced noise impacts along Blosser Road and this map should show this.	6.39
2-14	1	This plan should be taken out to 2050 because it has taken so long to get to this point and knowing that there is still so much work to do.	6.40
2-14	Fig 2-1	This table needs to be revised base on other tables that use other numbers. Double check the acreages.	6.41
2-14	4	Where is these 1,504 acres located? Is this in the city and not developed yet or is there other areas that the city is looking at for development. the bullets do not make sense ...why is there 463 acres of Commercial use in parens...if this is a loss or change in zoning this will be a huge lose of potential sale tax dollars to the city. Wht is 7 acres of airport use ? ll of these bullets are confusing and need a map to clearly note what this is trying to say.	6.42
2-14	5	These percentages need to be revised based on the correct acreage. Also, there are no lands in the city classified as vacant or agriculture. All lands have city land use and zoning for future development. Delete the second sentence.	6.43
2-15	1	Through 2050 ...	6.44
2-15	2	This paragraph should be revised to clearly state that most future housing projects will be exempt from CEQA based on newly adopted state laws. In the future the city will use this document as the main EIR for future projects and apply it to most projects in the future to save time and money in the permit process. There will only be few	6.45

		projects that additional environmental review will be needed and this included futured annexations. Add this statement to this Intended Use of this EIR.	6.45
2-15	Bullet 1	Update the city Zoning Map and Zoning Ordinance.	
	Bullet 2	Rezoning Properties as dictated by future development proposal. to be consistent with the General Plan	
	Bullet 5	Add water, wastewater, parks, schools, etc. Delete reference to natural /capital resource preservation and or restoration. This is not what the city is required to do as it is doing infill development and annexations.	6.46
	Bullet 6	This bullet needs to be very specific as to what future studies are needed.	
2-16	Bullet 3	Forward plan to LAFCO for approval of the SOI and annexations.	
Environmental Setting			
3-1	2	The second sentence needs to be clear that the SOI will also be expanded so that the annexations can be approved ...it would be more efficient to have both the SOI amendment and the Annexations to happen at the same time like was done in 1993..	6.47
3-1	3	Delete internal farm road and state east along a service road to the city of Santa Maria water tank complex.	6.48
3-1	4	Regional transit includes SMOOTH, medical and senior transit throughout the city and should be add to this list medical transit take residence to doctors in Santa Barbara. Also change the last sentence. Regional rail is provided by Amtrak with a bus stop at the IHOP on Main Street offramp. There is also a train station in Guadalupe to catch the train .. Freight transit is provided a by Amtrak and the SM Railroad spur from Guadalupe to the city of Santa Maria. Details are important for this process.	6.49
3-1	5	This is a redundant paragraph and needs to be changed as noted Page 2-3 para 3 Delete the sentence reference agricultural and vacant use as that is not appropriate for City of santa Maria.	6.50
3-2	1	Typo in last line ..Existing instead of exiting	6.51
Environmental Impact Analysis			
4.1 Agricultural Resource			
4.1.1	2	This paragraph needs to be revised to provide details on the county of Santa barbara and the Santa Maria Valley	6.52

4.1.1		Urban and Built -up Land ...this definition is not right. It doesn't not include the definition of urban density of up to 30 units per acre or more. Please expand this definition to include city boundaries and allowed uses	6.52
4.1-2	1	This acreage number of 5,116 does not seem right. Table 4.1-1 does not seem right. How much of this acreage is in the Orcutt SOI area? why is these analyses including Area 5B7 Area 7and Area 9 and the Airport Specific plan. All of these planning areas a have already been analyzed and have Statement of Overriding Consideration for the future development of these planning Areas. This EIR should only be reviewing the impact on agricultural impacts on the annexation area. Revise this table and the whole section to make clear what has already been approved in prior actions and what is being considered for the future annexation.	6.53
4.1-2	4	This paragraph needs to be clear that LAFCO 's consideration is only for the annexation areas	6.54
4.1-3	Fig 4.1-1	This figure is very wrong as it does not clearly identify what has been developed and been approved in Area 5B, area 7 , Area 9 including the development of Windset farms and the development of the Airport Specific plan. Also, this map and acreage should not include any of the land in Orcutt as this open space area is not agricultural uses..no row crops and no grazing. This map needs to be revised and clearly note what has already been approved by previous action by LAFCO, and city.	6.55
4.1-4	Fig 4.1-2	Add to this map the AQ Pres numbers and dates of expiration. Delete the note in the legend that says Williamson Act Enrollment 2023. This is not needed.	6.56
4.1-5	5 and 6	Delete paragraphs 5 and 6 as they do not apply to this project and the Santa Maria Valley. These issues are not impacting the Santa Maria Valley	6.57
4.1-5	Table4.1-2	This table needs to be laid out on one page, and it should only focus on the Santa Maria Valley. There has not been a loss of ag land since the annexations of the City of Santa Maria in1993 and the 200 acres in the city of Guadalupe in 1995. This section needs to refer to the history of planning in the santa Maria valley over the last 30 years. Revised this whole section.	6.58
4.1-8	3	Note in this a paragraph that there are no agricultural preserves in the city of Santa Maria.	6.59

4.1-9	1	This paragraph needs to be corrected as there is not 5,116 acres of ag land in this planning Area and the analysis should only be on the annexation area. What and where are the nine acres of grazing land. Is it the annexation area?	6.60
4.1-9	2-3	This paragraph needs to clearly state that ag land in the city of Santa Maria have already been approved in other EIRs for urban development with Statement of Overriding Consideration. The next paragraph needs to be blended into this one.	6.61
4.1-9	4	The reference to the Greenbelt and Urban buffer is very important as it has been the guiding planning tool for the city over the last 30 years. This buffer will be adjusted in the new SOI and annexation area.	6.62
4.1-11		Goal COS-2 Working lands: Sustainable and productive agricultural lands support healthy and diverse economic resources Revise this policy.	
4.1-11		Delete Action COS -2.1.2 this is not a feasible option for the infill of the City of Santa Maria	6.63
		Revise Policy LU-1.2 Infill development: Continue to encourage infill of existing residential, commercial, and industrial uses to revitalize downtown and existing neighborhoods to the extent feasible Delete the next sentence	
4.1-12	Fig 4.1-3	Delete this figure as it does not have a relationship with the annexation. Also the map has the wrong land use designations in each of the areas. The map should have included each of the Area numbers. What about area 7 and the SMAP. Either you show all of the planning areas in the city, or you delete this map Again, this figure should be removed as it is incorrect.	6.64
4.1-13		Revise Policy LU-9.1 Agricultural Resource. Accommodate future City growth in the SOI and annexation area while respecting agricultural resources outside of the SOI .	
		Delete Policy LU 9.2	6.65
		Policy LU9.3 Add the phrase and active agricultural uses “outside of the SOI and annexation area”	
		Policy LU9.4 Add the phrase and active agricultural uses “outside of the SOI and annexation area”	
		The last paragraph needs to be revised to clearly state that the SOI and annexation will convert ag land to urban uses. Delete the first sentence as there will not be conservation easements for ag land in	6.66

		the city. The city will plan land uses to address the “Greenbelt and Urban Buffer” to respect surrounding ag lands outside the city.	6.66
4.1-14	3	<p>the first sentence needs to be revised to state: The Santa Maria valley has over 180,000 (?) acres of prime land and an additional 100,000 (?) acres of non-prime and grazing lands. 30 years ago, the city of Santa Maria and Guadalupe annexed lands and there has been no annexations since. The city of Santa Maria annexed 2,000 acres and Guadalupe annexed 200 acres to provide land for the growth of these two cities. This is less than 1 % of the ag land in the valley.</p> <p>It is important to stress the effort the city , county and LAFCO have made to plan growth and protect agricultural over the last 30 years and now is the time to allow another small annexation for future growth.</p> <p>Most of this paragraph is not correct and needs to be revised.</p>	6.67
4.2 Air Quality and Greenhouse Gas Emission			
4-2-1 to 4.2-17		The first 14 pages are routine information in every EIR. Suggest that Table 4.2-4 be moved to the next page so that the whole table is on one page.	6.68
4.2-8	1	<p>Double check this first sentence as it does not seem right that the earth’s surface would be 33 degrees Celsius cooler. ???</p> <p>Also, there is no mention that the world population has increased by 7 billion people over the last 200 years. This should be included in this paragraph.</p>	6.69
4.2-9	1	This paragraph needs a table that CARB provides that start with the GHG level starting in 1990 which was over 500 MMT. The goal is to be 40% less GHG by 2030, This table will show how much the GHG levels in California have dropped. This has been done by requiring car modifications, reducing oil activities in the state and many building code requirements. Add this information to this paragraph.	6.70
4.2-14		<p>All three paragraphs under Global Warning need to include every time there is a reference to 1990 GHG levels at over 500 MMT at that time .you need to include this number so the reader can see how much the GHG level has already been reduced.</p> <p>Provide these details.</p>	6.71
4.2-15		Under Senate Bill 1383	6.72

		<p>Need to provide what the 2013 levels were for each of these targets and what the current levels are for comparison.</p> <p>Also note that Santa Maria has adopted the organic waste collection per this law.</p>	6.72
4.2-16		Need to add a reference to the 2026 building code that will require more energy efficiency requirements.	6.73
4.2-17	4	This paragraph implies that every project in the future in the city of Santa Maria will have to do a GHG and Air Quality Analysis. This will be very costly in the future ...why did not the City include GHG thresholds as part of this GP update. Also all infill projects should be considered GHG reduction project and not need any more studies and in most projects with housing will be exempt from CEQA by state law. You need to make this clear in this paragraph.	6.74
4.2-18	Table 4.2-5	<p>This table makes no sense. Only 7 acres of industrial when there are over 100 acres of vacant industrial land currently??? only 33 acres of parks when the Park Elements says they want 500 acres of parks. Where are the 452 acres of mixed use minus 463 acres of commercial so this is saying that all commercial will be torn down and rebuilt in the next 25 years???? If it is mixed use development what is the density of residential portion of these 452 acres ...how many units. If 30 units per acre there could be 12,000 units just in the mixed use infill It looks like that you double counted between res and mixed use.</p> <p>Clearly this model does not know that no one is planning on building 1021 acres or millions of sf of office professional or industrial uses over the next 25 years.</p> <p>It also does not include the fact the state is requiring that all existing and future development and vehicles be net zero by 2025.</p> <p>So basically, this model is not correct.</p> <p>This table should have been reviewed by developers and commercial real estate brokers and economic forecasters at UCSB to truth test these assumptions before running the CalEEMod</p>	6.75
4.2-18	4	The assumption used in the CalEEMod are dated as the building code has been updated several times since 2019 and there is going to be a new update for 2026. These updates continue to add more energy efficiency to building and housing construction.	6.76
4.2-19	Table 4.2-6	This VMT table is clearly wrong. If the job/housing balance in the city is 1.5 most workers will only have to drive 5 miles to work. With all of	6.77

		<p>the emphasis on mass transit and hybrid working there will be much less vehicle miles traveled. Also another factor is the deduct that the model needs to provide for the substantial increase in EV being purchased. The county of Santa Barbara VMT threshold is 19 miles. Also reference the ZEV report that SBCAG produced in January 2025. This report needs to be referenced in this section.</p> <p>Who came up with 47.6 VMT per household? Clearly wrong. Need to provide future assumption not what has happened in the past.</p>	6.77
4.2-20	7	This paragraph and others should also reference the ZEV plan and the projected reductions in the future.	
4.2-21	Thresholds	Why has the city not completed a GHG threshold review fo the city? Does this mean that every project in the future is going to have to do GHG analysis but need to note that most housing project will be exempt from CEQA now and in the future. That needs to be stated here.	6.78
4.2-24	ACTION COS-5.1.3	This action needs to be revised to state that most housing and mixed-use projects will be exempt from CEQA and will only have to follow existing conditions.	6.79
4.2-24	Policies Actions	Many comments were provided on these provisions in the Element so make sure the recommended changes are made here to be consistent	
4.2-25	Table 4.2-7	<p>This table needs to be run again as many of the build out assumptions in table 4.2-5 and 4.2-6 are incorrect.</p> <p>By 2045 -2050 many of these air quality impacts will be substantially reduced also this table needs to average this impact over the next 20-25 year as development occurs ...there is no mention that it is assuming full build out impact in 2045. Correct this table based on a corrected CalEEMod run.</p>	6.80
4.2-25	1	Delete the first sentence. You have already concluded in the table and discussion on page 24 that there is going to be a significant impact so why would you subject hundreds of future projects with wasteful studies on air quality and GHG analysis that you have already determined will happen and there has been a statement of overriding considerations adopted. Also, many of the housing projects will be exempt from environmental review. Make this clear in this section.	6.81

		Also since there is no adopted threshold this again is a waste of time and money to do studies on all these future projects. Delete this whole mitigation measure as inappropriate for future projects. There are standard air quality and ghg measures that are routinely required for projects based on the building code.	6.81
4.2-26	2-3	Delete or rewrite these two paragraphs. There is no need to do more studies based on this Programmatic EIR that has already run a CalEEMod on full build out. There will be an impact as projects are built out but these impacts will be progressively less, and state standards change. This is a plan fo the next 20-25 years and there will be many changes to improve air quality and GHG.	6.82
4.2-26	6	Revise this paragraph as state law requires that most construction related equipment be electric or hybrid in the next couple of years. most diesel construction equipment will be retired per state law.	6.83
4.2-28	5	MM AQGHG-3 This MM sounds like a very old standard that has already been implemented by many contractors. This needs to be reviewed by local contractors to get their opinion if this is even needed any longer. This document needs to stay up with the times and state law. Delete if no longer needed.	6.84
4.2-30	1	Over the last five years during this GP update process the city should have also generated GHG thresholds,	6.85
	2	What was the 1990 levels that we are trying to reduce by 40%?	6.86
	5	Goal COS -6 needs to be revised per other comments Encourage the city to be carbon neutral by 2045-2050 per state law. Action COS 6.1.1 too bad the city did not already get the GHG threshold done as part of this process but since the GHG level will be exceeded by the full buildout of the 2045-2050 plan there is no need to b do any further GHG studies.	6.87
4.2-31	1	The city of Santa Maria is served by PG&E not Southern California Edison...correct this paragrpagh	6.88
4.2-31		Delete Goal COS 6 and the following as they are listed on the previous page. Redundant.	6.89
4.2-31 4.2-32	11-12 1-2	These four paragraphs need to be revised. How can something be inconsistent and consistent at the same time?	6.90

		Also reference to VMT inconsistency is inappropriate since there are many measures that will meet the VMT reductions ..first being the job housing balance that is part of this plan as well as hybrid work and mass transit and EV's. The future will have many options to reduce AG and GHG.	6.90
		Revise the first consistency statement to make it clear that the 16,140 units will be split between the infill and the 980 acres of annexation area along with schools, parks, jobs, commercial etc. The plan is intend to take SM through 3 RNHA cycles since the last cycle Sant Maria was assigned 5,400 units to 2031. Refer to the adopted Housing Element.	6.91
		Revise the second consistency finding to make it consistent. Based on state law and other policies the build out to fhe City of Santa Maria will meet all of the future goals and stateslaws to reduce Air Quality and GHG. Also again correct that PG&E works with 3CE.	6.92
4.2-33	1	Delete the last two sentences of this paragraph as they are in conflict with most of the analysis. The city will continue in the future to meet state law and be consistent with requirements as the city grows and future plans are amended. You cannot hold the city to a 2022 Ozone plan in 2045.	6.93
	Table 4.2-9	First make this whole table on one page so it is easier to read and second this whole table needs to be revised to note that development will happen over the 20-25 years and will implement many air quality Measures. Energy is incorrect because the city is part of 3CE and they are working to be 100% energy renewable ..this should be substantially less or net zero based on state law and 3CE goals. Mobile should also be substantially less if all cars are to be electric by 2035???	6.94
4.2-34	1-2	Both paragraphs are wrong in that every statewide and local effort will result in reductions to air quality impacts and GHG impacts so that new development will be Net zero by 2045-2050	6.95
4.2-34-36		The whole cumulative section needs to be revised to address the future state requirements to be net zero by 2035. To hold the city to the 2022 Ozone plan out to 2045 is not appropriate. This Ozone plan is scheduled to be updated in the next couple fo years. Also, the 2050	6.96

		RTP/SCS plan will be updated to reflect the future General Plan for the City of Santa Maria. The infill plan and the planned annexation will address the requirement to reduce air quality and GHG over the next 20-25 year.	6.96
4.3- Biological Resources			
4.3-1	2	Rincon has done many EIR's and biological surveys in the santa Maria and should refer to the physical surveys that they and other consultants have done. These surveys have reports indicating very little biological resources in the SM Valley because of historic agricultural production.	6.97
4.3-1	3	Using the word "open space" is not the correct word as there is no dedicated open space it is all agricultural land uses for row crops, vineyards and grazing. The second to last sentence is wrong. The EIR needs to be clear that the land in Area 5B, Area 9, Area 7 and the SM Public Airport are having land use designation for residential commercial and industrial uses. The percent needs to be changed to indicate that over 85% of this land is designated for Urban uses. 29% land currently in ag/open space is an interim use before the full development in the land use designated areas occurs.	6.98
4.3-1	4	There is very little area with undistributed native habitat. According to the map most of this land is located south of Orcutt	6.99
4.3-2	Fig 4.3-1	This map is wrong. The colors in the legend do not make sense to the map. <ol style="list-style-type: none"> 1. Why is the SM Cemetery shown is green and there is no green color in the legend, it is not a habitat area. 2. The landfill both old and new have no biological habitat and yet this map shows all kinds of plants in the landfill area. Need to be corrected. 3. Rivergate Specific Plan has been graded multiple times and has no biological resources. 4. The Guggia and DeBarnardi property is all agricultural production so remove the brown color on their property. If it is to shown where the house and barn s are located brown area is it is much smaller than what is shown. 5. This map needs to clearly indicate that planning areas in the city. Delete reference to agricultural in Area 5B which is currently being developed with the sports fields and will be developed with 1,440 units in the next couple of years 	6.100

		<p>6. The Santa Maria Airport needs to be corrected.</p> <p>7. Area 9 is over half way developed with Windset Farms and many new industrial uses along Stowell Road .</p> <p>8. Area 7 is planned for 1,000 and other uses.</p>	6.100
4.3-3	1	Delete the last two sentences as they do not describe the biological resources of the last 100 years of agricultural production in the Santa maria Valley. Also as described in the Cultural resources most of the valley floor had very little surface water. Using the general CDFW description does not reflect SM Valley.	6.101
	3	Again, delete this generic description as it does not reflect the history fo the SM valley. Agriculture is very intense and only provides very limited opportunities for biological resources.	6.102
	4	Barren land does not exist in the valley. the agricultural land is too valuable and productive to go barren. Delete this paragraph.	6.103
	5	Delete this whole paragraph as it does not apply to the Santa Maria valley. Also this is a generic description from CDFW and does not apply to SM.	6.104
4.3-4	2	Where in SM Valley is this Pine/Cypress habitat? This needs to be specific or deleted as it does not apply.	6.105
	4-5	Chaparral is mostly located in the south Orcutt area never hear of Chamise-redshank chaparral in the Santa Maria valley. Again, this looks like a generic description but does not apply to the Santa Maria valley. This should be deleted.	6.106
4.3-5	2	Delete the word Ruderal as it does not apply.	6.107
	3	Again delete the paragraph on Barren lands as it does not apply and is a generic description form CDFW. This definition should be part of the paragraph above as this is land that is being used in streets, parking structural improvements and is not barren. It is developed.	6.108
	4	<p>This paragraph uses uncommon words that are generic to the state of California CDFW.</p> <p>Riverine should be called blue line river or stream and identify the Santa Maria River as such. Also what about Orcutt Creek and Solomon Creek in Orcutt.</p> <p>What about vernal pools? Why are they not identified in this document as CTS are very important habitat for planning in the SM Valley. These need to be described in this paragraph</p>	6.109
4.3-6	Fig 4.3-2	<p>Again, another figure that is wrong.</p> <p>1. This aerial photograph has to be over 15 or 20 years old and does not include Windset farms or Enos Ranch and many infill</p>	6.110

		<p>projects. Rice Ranch just started grading in 2005, This EIR document should be using a very recent base aerial photograph to show how much of the city has been developed.</p> <ol style="list-style-type: none"> 2. Both Santa Maria Wastewater plant and LCSD plant discharge ponds are not Freshwater ponds!!!! This needs to be corrected. 3. There are many basins with the city for flood control and recharge. Rivergate SP Area, Waller Park, SMCC, 	6.110
4.3-7	2	Delete this paragraph. Again, there are no barren areas that meet this definition unless this is supposed to be the Santa Maria Levee. In which case this section should clearly state this, but the levee serves a very important purpose and should not be a called Barren.	6.111
4.3-7	Bullets	B Special Status Species whole section is in the wrong place move this to Page 4.3-9 before Special Status Plant Species	6.112
4.3-8	1	Correct refence to Appendix C not B.	6.113
4.3-8	2	<p>Again this description does seem to apply to Central Coast Grasslands. The fourth sentence refers for fall rains which is not true, this region has winter and spring rains. Write this description to reflect the Santa Maria Valley.</p> <p>The grassland and perennial grassland also need to note that in this region they are predominately used for cattle grazing and also serve as CTS habitat. Make these descriptions specific to SM Valley.</p> <p>We do not the Roosevelt Elk in the Santa Maria valley</p>	6.114
4.3-9	1	Oak woodlands in this area in located in the southern Orcutt Area. not in the city of Santa Maria or the Planning Area. Please make that clear in this paragraph.	6.115
	2	Delete this paragraph as it does not apply to the area being studied in this EIR	6.116
	3	Delete this paragraph as it does not apply to the area being studies in this EIR.	6.116
4.3-10		<p>Refer to Appendix C not B on this page</p> <p>What does the vicinity of this plan mean? One mile? Five miles? Show a map that was studied for this report?</p>	6.117
	2	This paragraph should be very clear that the potential for these 13 plant species is very unlikely as infill development has already reduced potential for these plants and the Planning Area for annexation has been in full ag production for over 100 years.	6.118
	3	Again, what is the plan area that was studied to determine that species in the area. Also, make it clear that the development infill has very low potential and the Planning Area for annexation also has very low potential because of the 100 years of Ag. Production.	6.118

4.3-11	Last two para	<p>These paragraphs should be listed in bullets as it is very confusing what is the difference between Sensitive Community and Critical Habitat</p> <ol style="list-style-type: none"> 1. Southern Vernal pools at Airport and on the east and west side out of the Sphere of Influence of the city. 2. Steelhead trout potential in the Santa Maria River . 3. La Graciosa thistle and the red legged frog in the southern portions of the Orcutt area. 4. No mention of Lompoc Yerba Santa in this section but it on the map. Also not mentioned on page 4.3-10??? 	6.119
4.3-12	3	<p>This paragraph and Figure 4.3-4 do not make any sense. Most of the santa Maria is not known for wildlife corridors. There are known regions of CTS on the east and west side of the Santa Maria Valley but connectivity between these vernal pools is not documented.</p> <p>The paragraph refers to the Sierra Madre and San Rafael Mountains that are over 30 miles away from Santa Maria. This whole paragraph should be deleted.</p> <p>The Santa Maria may serve as connectivity, but the map only shows a small polygon in the riverbed.</p>	6.120
4.3-15	2-4	<p>This section does not discuss the Supreme Court Decision on Water of the US, that needs to be included here.</p>	6.121
4.3-17	2-5	<p>Does the Supreme Court Decision have influence on waters of the state???</p>	6.122
4.3-20	2	<p>Again, this is disappointing that this EIR was not more thorough and clearer that future infill projects and the Planning Area will NOT have biological impacts and will NOT need additional biological surveys. The only areas that may trigger additional biological surveys are south airport area and those areas in the southernmost sections of Orcutt SOI but most of that area has already been developed.</p> <p>Revise this paragraph to make this clear.</p>	6.123
4.3-21	1	<p>Revise BIO-1 to make it clear that biological impacts will only happen to the southernmost areas of the Orcutt area.</p>	6.124
4.3-21	2	<p>Revise this paragraph to make it clear the there are no special status species within the infill areas of the city and in the Planning Annexation area. Only special status species occur in the south Orcutt area. There is no incremental loss of habits or fragmentation of open areas or loss of wildlife corridors. Delete this sentence. Make these corrections.</p>	6.125

4.3-21		Delete Policy COS-1.1 This is an infeasible policy and is inconsistent with infill development and the annexation areas.	6.126
		Revise Policy COS 1.3 by stating the only place for planting biodiversity species is in city parks.	6.127
4.3-21	1	Again, there is no indication what the “Plan Area “ is. Make it clear that most of these 13 plants are located over five to ten miles from the city along the sand dunes and none of these plants are in the city or the SOI or the annexation area.	6.128
	2	Delete this paragraph since none of these plants exist in the city or SOI or annexation area. so, there is no significant impact.	6.129
	3	This paragraph needs to be clear that within the city there are no wildlife species found and the annexation area is production agriculture and no species found. Make it clear that no additional studies are needed within these areas.	6.130
	4	What is the “Plan Area” for these species? They have not been found in the city and the annexation area. Revise this paragraph to make sure that there is no significant impact within the city.	6.131
4.3-23	1-2	The Mammal discussion is again not relevant to this General plan update as there are no known bat colonies in the city and the annexation area that do not have any trees. Also there have been no known badger dens in the city of Santa Maria or the annexation areas so there is no significant impact.	6.132
	3-5	These paragraphs need to be clear in that none of these have been identified in the city of Santa Maria or the annexation area.	6.133
4.3-24	2	Delete whole paragraph referencing burrowing owls as there have not been any identified in the city of Santa Maria or the annexation area.	6.134
4.3-25	3-5	This whole section needs to be clear that these amphibians are not located in the city of Santa Maria for the infill sites nor are they in the Planning Area for annexation so no additional studies are needed for future developments.	6.135
4.3-26	2	Bio -1(a) This whole MM needs to be rewritten as it does not apply to the infill of the City of Santa Maria or the annexation area. Also most infill projects, particularly housing projects, will be exempt by environmental review. The city should make it clear that there will not need to be any more bio studies except for maybe birds and bats. This MM is poorly written and way too long. It needs to be reduced and only focused on the city.	6.136

		BOI-1(b) Delete this MM as it has been proven that there are no special status plants in the City of Santa Maria or the annexation area. No additional studies are needed as it will be a waste of time and money. If you want to cover this issue, make it clear that it only applies to the southern area of Orcutt.	6.137
		BIO 1.(c) Delete as not applicable to the City of Santa Maria or the annexation area.	
		BIO 1(d) Again delete this MM to make it clear that this only applies to the southernmost area of Orcutt, There is no need for any Habitat Plans for the city since no habitat exist in the city or the annexation area.	6.138
		BIO-1(e) and BIO -1 f should be deleted as they are not needed in the city of Santa maria infill and the annexation areas. These MM are too long an should be deleted as too costly and waste of time for city projects. Also most housing projects are except for environmental review nd these MM will not apply.	6.139
		BIO-1(g) the WEAP training is appropriate because it includes a lot of other training beyond BIO stuff.	6.140
		BIO-1 (h) there have been hundreds of city projects and none of them had legless lizards so this MM needed to be deleted as it is not needed and it is a waste of time and money for infill projects and the annexation area.	6.141
		BIO-1(i) This MM needs to be substantially reduced. Having a page and half to require bat studies that are very rarely occurring in santa Maria. All you need o say is if a bio screening and assessment has been done and bats are found then standard study will apply.	6.142
4.3-32	1	BIO-1(j) this mitigation measure needs to be clear that it only applies to site with eucalyptus trees in the south city of Santa Maria and Orcutt area.	6.143
		BIO-1(k) Again this MM is over kill if bird survey is to be done follow standard procedures. It should be noted that there have been very few projects in the city of Santa Maria and the annexation area that will require bird surveys.	6.144
4.3-33	3	This whole paragraph needs to start with the first statement which is that the city of Santa Maria and the annexation area have no known special status species and do not have to conduct biological surveys. If nesting birds and or bats are determined to be in the infill areas of Santa Maria then surveys and MM will be done for them.	6.145

		Delete reference to many of the MM that are to be deleted as not needed in the city of Santa Maria or annexation area.	6.146
4.3-34	1	Impact BIO-2 This impact's first two sentences do not apply to the city of Santa Maria since there is no wetlands in the infill of the city or the annexation the only impact is working with NPDES permits for construction impacts.	6.147
	2	This whole paragraph needs to be revised to state that there are no marine habitats, or freshwater nature ponds in the city or the annexation area. The figure referenced is incorrect and needs major corrections. There are manmade flood control basins and channels that are designed to dry up most of the year	6.148
		Delete Policy COS-1.1 and COS 1.3 as both policies are infeasible. Revise COS 1.5 should be revised to only focus on birds and bats that may have potential in the city of Santa Maria and annexation area.	6.149
4.3-35	1-2	These two paragraphs need to delete refence to MM Bio's since most of them are deleted.	6.150
4.3-36		Delete COS-1.1 and COS 1.3. Revising COS 1.5 make this police clear that the infill of the city and the annexation has no impact on species except for maybe birds and bats.	
4.3-37		Delete COS -1.1 Because there is no wildlife corridor in the city or wetlands, and this policy is infeasible. Delete the Policy COS 1.3 as it is infeasible unless it is only focused on city parks, Revise Policy COS 3.1 as the Urban Forest Management Plan has not been adopted. Also, it is infeasible to have a 20% tree cover if the city includes all of the land in the airport district and in areas 7 and 9. This percentage should only apply to the built-out city and the infill and it should include trees on private properties, school sites, AHC and other areas.	6.151
4.3-38 4.3-39		The whole cumulative section needs to be revised to clearly state that there are no known special status species in the city or the annexation area. The second and third paragraphs need to be revised to be clear as there are no wetlands in the city or in the annexation area. There are some CTS vernal pools in the south on the airport and Area 7 so these paragraphs should focus on this.	6.152
4.4 Cultural Resources and Tribal Cultural Resources.			

4.4-2	6-7	<p>Where is the Historic Overlay District? You should include a map showing this and where the following buildings are located. Also include the map from the existing element to show the potential of cultural resources in the city</p>	6.153
4.4-4 4.4-8		<p>All the laws listed on these pages should include the date they were adopted.</p>	6.154
4.4-8		<p>SMMC This code needs to be changed to either change the requirement to 70 years ago or only apply to buildings build before 1950. Anything after that is not a historical building and most of the residential buildings are tract houses.</p> <p>Another option would be to consider buildings in the 4 sq mile area built before 1950.</p> <p>Since the city goal in the Air Quilty section is to tear down almost all of the commercial buildings in the city and build mixed-use buildings this standard for existing building review needs to be clear.</p>	6.155
4.4-9		<p>Resource Management Element First you need to be clear that this old element is being retired and a separate resolution will be needed to retire this element. Second, all the maps should be in the EIR and the new elements.</p> <p>In this case the map in the Resource Management Element needs to be added to this EIR and the COS Element. The map will identify those areas with negative or low sensitivity versus those areas with higher levels of sensitivity</p> <p>This paragraph notes that there is a low level of cultural resource in the Santa Maria Valley, but it does not explain why. Most of the valley was in the flood plain of the Santa Maria River and cultural resources were lost in periodic flooding for over 10,000 years. Also, after the rainy season there was very little surface water available throughout the rest of the year, so the Chumash moved from the Solomon hills to the Nipomo Mesa where water was available.</p> <p>The historic riverbed was the bluff running east west just north of Betteravia Road.</p>	6.156

		<p>South of Betteravia into the Orcutt area there are a few sites identified. Most of them are in the area around Orcutt and Solomon creek because of the periodic water source in those creeks.</p> <p>Add this history to this EIR and the COS document.</p>	6.156
4.4-11	Last Para	<p>This paragraph needs to be clear that before 1960 the population of the city was about 35,000 with maybe about 9,000 units, mostly in the 4sq mile area. Now the city has almost 30,000 units with many of them built over the last 70 years. They are mostly tract homes and apartments. The city ordinance needs to be revised to state that tract homes and units built after 1960 are not historic units.</p>	6.157
4.4-12	Act COS 7.1.1	<p>Where is the Historic Overlay District??? Where should it be expanded??</p>	6.158
4.4-13	1	<p>This paragraph needs to be revised to clearly note that the city ordinance is for 50 years older not 45 years old. Also, all developments since 1960 is not considered historic and are not required to be surveyed or studied. It is important to set a date and not years as the building will continue to be older but are not historic.</p>	6.159
4.4-14	2	<p>The last sentence should end with the phrase” ...south of Betteravia Road.”</p>	6.160
	3	<p>The last sentence should end with the phrase “...south of Betteravia road”.</p>	6.161
4.4-15		<p>CUL 2a, 2b, 2c</p> <p>Add the phraseFor projects and new development south of Betteravia Road the staff will determine if studies are needed.....</p> <p>The MM shall only apply to south of Betteravia Road as noted on the Res. Management Map.</p>	6.162
4.4-16 4.4-17 4.4-18		<p>All of these paragraphs and MM need to add the phrase ...south of Betteravia Road.</p>	6.163
4.4-18	10 Cul-4a Cul-4b	<p>This paragraph is stating that all future projects will need to go through tribal consultants. This sounds like this is “a second bite at the apple. The city already went through consultation process for this General Plan update and Planning Area and there was no response. Why would the city force future projects to go through additional time and money for a second round of consultation. This needs to be revised.</p>	6.164

		<p>We understand that there may need to be consultation for projects south of Betteravia. Revise this paragraph and the MM.</p>	6.164
4.4-19	4-5	<p>This discussion needs to be very specific as only structures in the 4 sq mile area are considered potentially historic based on dates of when buildings were constructed. Only refer to this area for additional studies with future development. Also recommend the ordinance amendment to apply to this area and buildings that were built before 1960 and maybe even earlier.</p>	6.165
4.5 Hydrology and Water Quality			
4.5-1		<p>This whole chapter need to include details on the following items throughout the chapter because so many things have happened over the last 30 years to improve the quality of the surface water and groundwater basin.</p> <p>Twitchell Dam. Note when the Dam was built and what agencies manage the operation of the Dam. The Dam serves two purposes one is for flood control of the Santa Maria Valley. This is coordinated the BLM and County Flood Control. The second purpose is serving as recharging of the groundwater basin. Release of water and the overall dam operation is managed by the Santa Maria Water Conservation District which is run by an elected Board of Directors along with the Twitchell Management Authority that was set up by the court in the adjudication of the groundwater basin. The TMA has representatives from the city, agricultural and other ground water users.</p> <p>State Water Supplemental water was delivered to the Santa Maria Valley around 1996 as part of the Central Coast Water Authority construction of the pipeline. Santa Maria is the majority holder of the state water and pipeline project. The purpose of this 17,000 AFY (??) water allocation is to improve the groundwater quality and reduce pumpage from the groundwater basin. This allocation fluctuates depending on the snowpack in the Sierras. The state water is blended with historic ground water pumpage.</p> <p>Waste Water Discharge: This blende water improves water quality goes as far as improving the wastewater discharge at the treatment plant ponds that percolate in the groundwater basin and the city gets credit for this discharge in their water portfolio. The bottom line is that this whole section needs to discuss the benefit of state water in the</p>	6.166

		<p>Santa Maria valley and the reduction fo TDS in the ground water basin. There is really good information in the 2024 annual basin report.</p> <p>Adjudication of the basin. For over 10 years the city, farmers, and other groundwater users fought through a very expensive lawsuit on the status of the Santa Maria basin and the addition of state water. In 2007, the court determined that this basin was not in overdraft and appointed basin managers through the Twitchell Management Authority and the SM Valley Conservation District. The TMA prepares an annual report that reports to the court on the progress of this managed basin. RWQCB mainly monitors the water quality and TDS levels.</p> <p>Agricultural conversation. Most of this section needs to acknowledge and provide details that the conversion of city urban agricultural and the annexation area agricultural uses will result in substantial reduction of groundwater use. In most case active row crop production will require 4 AFY of water per acre of land whereas urban uses between .5 to 1 AFY per acre or less. The buildout of the city and the annexation will result in a net benefit to the groundwater basin.</p> <p>Also agricultural operators have become much more efficient in their water use. They use laser leveling and hoop houses and greenhouses, and other techniques to reduce water use. The TMA report shows documentation of this reduced water use. This needs to be noted throughout this section as a benefit to the ground water basin.</p> <p>Reduced urban water use. Finally, the 2024 report indicates a 40% - 50% reduction of water use per capita over the last 25 years. This is the result of higher density projects using less water and the increase in water costs that encourage water users to conserve. This is a big benefit to the basin and will continue.</p> <p>Add all this background information in this section. And include the detailed supply table from the 2024 report in this section.</p>	
	5	<p>The last sentence needs to be changed to say...Groundwater blended is state water is used for industrial, municipal, and government uses within the city.</p>	6.167
4.5-2	1	<p>This paragraph seems to be focused on agricultural operations from 30 years ago. Agricultural operations are much more efficient and</p>	6.168

		<p>substantially reduce chemical use for food production. Also, urban agricultural operations in the city are not a major source of sediment and do not impact on the city storm drain system.</p> <p>Delete the third sentence as all the urban agricultural operations are located on the west side of the city and will not impact surface water in the city.</p>	6.168
	2	<p>The first third of the paragraph should be a separate paragraph as it is discussing the end of the SM River which is located 11 miles away.</p> <p>The rest of this paragraph lists all types of chemicals used in the valley, but it does not state that most of these chemicals are being substantially reduced by agricultural operators.</p>	6.169
	3	<p>TDS levels in the basin has been improving over the last 30 years based on all of the point noted above.</p> <p>The second sentence should be added to the Guadalupe paragraph above as it has nothing to do with the city of Santa Maria.</p> <p>The third sentence is poorly written as it does reflect what is happening in the basin as noted in all of the points discussed above. The water quality in the basin is improving with reduced TDS levels mainly because of the State water adding to the basin.</p> <p>Revise this whole paragraph...</p>	6.170
	4	<p>This whole section needs to be expanded to explain how the city of Santa Maria works with County of Santa Barbara Flood Control on major channels and basins that FC operate in the city.</p> <p>There is also no mention of the Santa Maria Levee and what it does for the northern half of the city of Santa Maria which historically flooded.</p> <p>Ther is no mention of Twitchell Dam and benefits provided to reduce flooding in the valley and the city.</p> <p>Where is Lake Guadalupe (which is misspelled throughout this section)? Is it west of Santa Maria...are you sure it is not Betteravia Lake? What is a seiche???</p>	6.171
4.5-4	Fig 4.5-1	<p>Should label Ranta maria river along with the location of the santa Maria Levee. Also label Orcutt Creek.</p> <p>Suggest providing a regional map that shows where Twitchell Dam is located as well as the Lake, and the end of the Santa Maria River. And other drainage features.</p>	6.172

4.5-5	6	Need to include discussion on the Supreme Court Decision about waters of the US and what is the new definition.	6.173
4.5-11		Policy S-3.3 change ponds to basins . Revise Policy S-3.4 to state .. “Coordinate with County Flood Control to maintain and upgrade”	6.174
4.5-12		Change HYD-2the GP update would incrementally increase the The second sentence needs to state that the SM Water conservation District and Twitchell Management Authority will assure the quality of the Groundwater Basin and the blended use of water with State Water and recharge is assuring the basin is in balance.	6.175
	3	Revise the first sentence “.....Santa Maria River Valley Basin within the infill of the City of Santa Maria and the annexation area which could incrementally reduce the	6.176
	4	Delete the last sentence as it does not make sense, you cannot reduce impervious surface while building buildings and parking lots???	6.177
	5	Delete the word River in the first line.... What is the amount of groundwater rights the city has based on the adjudication of the groundwater basin...as managed by the Twitchell Management Authority. The groundwater is augmented by state waste, discharged water, and other sources for the future growth of the city and the annexation area.	6.178
4.5-14	1	The Rivergate Roemer Specific plan area is in the 100-year flood plain and will need to be designed to raise the finish floor two feet above the flood plain. This development will also need to process LOMR map revision with FEMA.	6.179
	3	Correct the spelling of Guadalupe. Not sure if there is a Guadalupe Lake. What is a seiche? Show that the levee is protecting the city if anything happens with Twitchell dam. Delete reference to Lopez as that dam is 30 miles northeast of Santa Maria.	6.180
		Policy S-3.6 add BLM, ACOE, and other federal agencies coordinate with county and state and city with the Twitchell Dam and the Levee.	6.181
4.5-15		Impact HYD-5 this impact is wrong in that there is an adjudicated order management plan coordinated with Twitchell Management Authority and Santa Maria Water Conservation District. Rewrite the next two paragraphs to correct the agencies that manage the groundwater basin. The basin plan from RWQCB is mainly	6.182

		focused on surface water and groundwater quality. TMA and SNWCD are focused on quantity and state water additions to assure that the basin remains in balance.	6.182
4.5-16 4.5-17		<p>Cumulative Impacts. This whole section needs to be revised to include the many points made in the comments above.</p> <p>The health of the groundwater basin both quality and quantity are well managed by the Twitchell Management Authority, and this chapter needs to document how this has happened over the last 20 years and how it will continue to be well managed and improved as the city of Satna Maria grows.</p>	6.183 6.184
4.6 Noise			
4.6-4	3	Add in the paragraph...The current Santa Maria General Plan	6.185
4.6-5	Table 4.6-3	This table needs another column that identifies all segments of these roadways that have already existing sound walls or abutting structures that limit the noise level contours particularly along the US highway 101 on both sides of the highway.	6.186
4.6-10	Fig 4.6-1	This map needs to be updated to include the Enos Ranch apartment project and new school, Skyview Project, and other projects that have been approved in the last couple of years.	6.187
4.6-11	Fig 4.6-1	<p>This exhibit needs to include Waller Park as it is included in the city of Santa Maria inventory. Also, the legend includes water which is incorrect. These are vernal pools and should be labeled correctly. Also, not sure why they are even listed on this figure as being relevant for noise contours???</p> <p>Should label this noise contour map as adopted by the County Airport Land Use Commission 2023.</p>	6.188
4.6-11	Fig 4.6-3	This map needs to be revised to clearly indicate where existing sounds walls and structures are located that mitigate noise impacts to the surrounding area. Most of 101 has high sounds walls so that noise contours do not go beyond these walls. The contours 65 and below should not be shown on this map as they do not apply particularly along 101. The city has done a good job over the last 30 years to reduce noise impacts to residential and other uses by requiring soundwalls where they can be built.	6.189
4.6-14	Table 4.6-4	This table needs to be revised to include the city ordinance that allows exterior noise level to be 75 dBa along major corridors. Also the city is	6.190

		now encouraging residential development without perimeter sound walls, so it results in higher noise levels in these projects These standards need to be documented in this table.	6.190
4.6-14	Table 4.6-5	This table needs to be revised as it is not correct. Daytime exterior noise level is 65 with 75 along major corridors.	6.191
4.6-15	7	This paragraph should also note that as more electric vehicles are added to the fleet of cars in the state the noise level along road ways will be reduced. As required by state law there will be only EV sold by 2035	6.192
4.6-19	7	This paragraph should also include Fairgrounds, sports fields, high school games, which are all near residential areas.	6.193
4.6-19	8	This paragraph and the following exhibit is wrong as future noise levels along roadways will be substantially reduced as EVs become the predominant vehicles and trucks in the state.	6.194
4.6-20	1	This whole paragraph is wrong as there will not be significant increases in traffic noise in the future. In fact, the noise levels on roadways will substantially be reduced based on EV and new technology. The second half of this paragraph was very disappointing, this EIR should include analysis of 8,000 new units in the annexation areas along with new schools, parks, commercial uses. Etc. What is the point of this IR if this analysis did not happen?	6.195
4.6-21	Fig 4.6-4	This map does not look much different from the existing map on page 4.6-12. The map needs to be corrected to adjust contour lines where major sound walls and buildings are located along 101 and that reduces noise along the freeway	6.196
4.6-22	Table 4.6-8	This seven-page table needs to be revised to address the reduction of vehicle noise from new EV standards being required by the state. This information needs to be added to the consultant model which will show that traffic noise will be reduced over the next 20-25 years.	6.197
4.6-30	Policy and Actions	All of these items need to be deleted as it is infeasible for development to pay for sound mitigation beyond their project. The idea that there is such a thing as noise reduction in-lieu fee is infeasible as there is no way to determine the cost of “quiet Pavement” throughout the city?????? Or the cost of off -site sound walls. All of these provisions need to be deleted.	6.198
4.6-30	NOI-1	For the most part this is standard condition, but the city should confirm that they have had these provisions reviewed by contractors in the area that use these requirements during construction	6.199
4.6-31	6	This paragraph should be revised based on the state requirements to have EV’s for vehicles and trucks over the next 20-25 year along with	6.200

		hybrid working and mass transit which also will be electric that will substantially reduce roadway noise. This plan needs to address what the noise levels will be in 25 years not what they are today.	6.200
4.6-35 4.6-36		The Cumulative review needs to address the reduction in noise as both construction equipment and all vehicles transition to the use of electric vehicles. This is the future in California, and this document needs to reflect the future requirements. Para 1 on page 36 needs to be revised to state that traffic noise will be reduced and will not have a significant impact.	6.201
4.7 Transportation and Traffic			
4.7-1	1	There is a reference to a travel demand model evaluated by GHD date June 2025. But there is no indication that the TDM was reviewed by the public and other traffic consultants. Where is this study... it should be an Appendix. And it should be peer reviewed by local traffic engineers...why did they not do a VMT analysis also?? The city has an adopted screening tool for infill projects that do not have to do any further studies. This map needs to be added to this sections.	6.202
4.7-1	3	The list of uses needs to include truck hauling routes for agricultural products and industrial haul routes for VSFB and other industries.	6.203
4.7-2	9	Is this paragraph correct? I have worked on many projects along Betteravia and never heard of this classification for Betteravia??	6.204
4.7-3	Table 4.7-1	This table needs to be expanded 1. include the road right of way widths for each of these roadways. 2. how do complete streets change the width and design of these road segments? Do complete street standards only apply to new city streets? What is the whole right of way width needed for a complete street? Travel lanes, sidewalks, trees, bikeways. You should include a cross-section of what a complete street is? Or provide details in the appendix. 3. need definition for public alley ways 4. need to have definition of private roads and driveways for small lots and multifamily development that will not have complete street design. These private streets will not be maintained by the city so they will save maintenance costs for these private roads ,, they will be maintained by private HOA's.	6.205
		Active Transportation Plan should be included as an Appendix.	6.206
4.7-4	Fig 4.14-1	This map needs to be updated to include the connection to 101 and UVP, extension of Seaward Drive to 101. Revised the location of	6.207

		Bradley Road through Enos Ranch. Include the road pattern for the Blosser ranch Specific Plan. Include the roads for Area 9 and 7 that are part of the Circulation element Need to identify all of the measures A projects that are already funded.	6.208
4.7-5		All of the bikeways need to include the standards and widths for each bullet.	6.209
4.7-5		SMRT. This paragraph states that ridership is rapidly increasing. Need to provide a table of ridership over the last 10-20 years to prove this statement. Ther may be some routes that higher level of ridership particularly for the schools.	6.210
4.7-6		There are six bullets describing transits but there are more that need to be added SMOOTH, Dail a Ride, Senior Transits and Medical Transits that are provided by Marian and other medical services. These are important services that do not cost the city anything but serve needy clients.	6.211
4.7-6	GHG	Every reference to GHG emissions to 1990 levels need to include what the emission were in 1990. If I remember at the time California documents that GHG was at 540 MMT. What was the level in 2020? Was it achieved?	6.212
4.7-7		This document needs to include the 2021 Active Transportation Plan so readers can see where these bikeways are to be located. Did the ATP include the annexation areas? If not does this mean that the ATC now needs to be updated to plan bikeways in the annexation area? Why was it not part of this EIR and General Plan update?	6.213
4.7-8		SMRT..Did the Short-Range Transit Plan include a map? It should be included in this EIR to show what has been approved. Did the plan include the annexation area? if not, does this mean that this plan will need to be revised for the annexation area?	6.214
	5	This section needs to provide a map and table which shows existing traffic in the city and what is proposed by 2045. Along with LOS. I know that EIR's do not have to include traffic studies with LOS for roadways and intersections, but Table 4.6-8 future noise impacts provide the details on the traffic existing now versus what traffic is going to be generated in the next 25 years. There are roadways and intersections that will experience 2 to 5 times as much traffic as existing now. Where is the plan that identifies those roadways and intersections that will operate at LOS F at full build out. This EIR needs to include a map for the circulation element for 2045-2050.	6.215

		<p>For example, Broadway south of Betteravia will have traffic increased from 47,500 ADT to 91,630 ADT. What does that mean for that road segment. Where is the plan for the future of the circulation element. What is this going to do for the AB 1600 fees and other funding sources for road improvements?</p> <p>This EIR and the General plan elements need to be consistent with each other and at this point they are not.</p>	6.215
4.7-10		<p>Bullets need to include the Travel Demand Model. Is this model to be used in the future by local traffic engineers to determine impacts on roadways and intersections? Or is the model the sole source of GHD and every traffic study in the future is only done by this firm?</p>	6.216
		<p>Delete Policy CIR-1.2 as privately maintained driveways and streets will not be designed to meet complete streets requirements. What is a Street Network? What is a Bikeway Network? What is the Pedestrian Priority Improvement network? These plans need to be in the EIR or an appendix.</p>	6.217
		<p>Policy CIR-1.3 Delete reference to private streets</p>	
		<p>Action CIR-2.2.2 another sentence should be added to this Action. The AB1600 traffic fees collected from development projects will be used as matching fund for future grants and funding programs.</p>	
		<p>Policy CIR-6.4 What is Transit Oriented Development? There is no mention of this in any part of this EIR. Should there be more information provided or reference the source for this?</p>	
4.7-12		<p>Delete CIR-6.1 This circulation Element and EIR should have included the citywide street design standards so the public would know what the city is planning.</p> <p>Again, here is a reference to a plan SM Regional Transit Standards? Does this plan already exist? When was it adopted?</p>	6.218
		<p>Action CIR-6.4.3 Delete second bullet as it is inconsistent with the Noise element and this EIR noise section.</p> <p>Delete the last two bullets as they are inconsistent with other policies. First most projects will have private streets, and the HOA's will not allow buses to come into these projects. Second, the last bullet is subjective and inconsistent with the Objective Design Standards that the city has adopted.</p>	
		<p>Policy CIR-7.2 this policy is inconsistent with the General Plan element they proposes to Annex 980 on the east side of the freeway. In fill should not take priority over the annexations. Revise this policy</p>	

		to state that infill and annexations areas will prioritize mixed-use development	6.218
4.7-13		Again this whole page includes references to Bikeway Network, pedestrian Priority Improvement network and ATP but does not provide these maps. At he end of the page it says that there are no MM but what about major road improvements that will be needed to address 2-5 times as much traffic in the major streets and intersections in the city over the next 25 years.	6.219 6.220
4.7-14	Table 4.7-4	Why is new development being treated differently? Why do these projects have to reduce VMT to 24.2 and 32.8 %. This is infeasible and the law only requires a 17% reduction. The last sentence does not make sense as the CARB requirement is only 17%. Revise this sentence. Also what does the new state law AB130 do for VMT requirements?	6.221
4.7-15		Policy CIR-7.1 and Action CIR-7.1.1 It is important to note that most housing projects will be exempt from environmental review. They will not need to do traffic studies or address VMT because they will be infilled. Please add this note to these policies	6.222
		Policy CIR-7.2 see comment above to revise this Policy.	
	6	The sentence on page 4.7-14 says the city will be consistent with CARB standards but this paragraph says the city would be inconsistent. Please clarify which is correct.	6.223
4.7-15	7-8	So based on the two paragraphs does it mean that every future project that is not a housing project will be required to do an EIR because it will not be able to reduce the VMT's below 17% or if an employer it has to reduce VMT by 32.8%...Basically most new employers (retail and industrial /office uses) will have to make sure their employees do not have cars and can only ride bikes and buses or walk!! Or they will have to pay huge mitigation fees which have not yet been determined. Or will the Statement of Overriding Consideration for this EIR override the need for future VMT impacts.	6.224
4.7-16		Policy CIR-1.3 delete reference to private street	6.225
4.7-17		Same comments from above on the first three items.	6.226
		Policy CIR-1.9 this policy needs to be separated into two policies. the first should just focus on LOS for roadways and intersections and	6.227

		<p>based on the Table in the noise section it is clear that the LOS in the city will be D, E, or f by full build out. There is no need to require Deficiency plans as we already know that most intersections on Broadway Betteravia and other major arterials will be significantly impacted in the future.</p> <p>The policy should focus on bicyclists with the known increase of traffic on the major corridors the city should be focus on moving bicyclists to other side streets.</p>	6.227
		<p>MM this infill buildout will result in significant traffic impacts throughout the city and needs to be addressed EIR. We need a detailed map that shows future roadways, and which intersections will exceed LOS D,E,F. .</p> <p>How is the city going to address these major impacts?</p>	6.228
4.7-18	2	<p>Does this Paragraph mean that the city will accept LOS D, E and F throughout the city at full build out.</p> <p>Also the third paragraph seems to imply that all future projects will need EIR's because they will not be able to reduce VMT below these new thresholds. Need to be clear that most housing projects will be exempt from CEQA and will not have to address VMT reductions because they are infill projects as indicated in the city screening tool</p>	6.229
4.8 Utilities and Service Systems			
4.8-1	2	<p>Also add to this paragraph that the adjudication included return flows from the wastewater treatment plant for the percolation ponds.</p> <p>This section should include how the city has been very successful in reducing water consumption per capita. The same is the reduction of water use in agricultural operations.</p>	6.230
4.8-2	Table 4.8-1	<p>This table needs to be formed on one full page to make it easier to read.</p> <p>Does this table and report from WSC qualify as a WSA per state law since there are more than 500 units?</p>	6.231
4.8-3 4.8-4		<p>Wastewater section. What is the current flow to the treatment plant? With a 50% increase in population over the next 25-30 years what will be the capacity of the plant at that time? Will there be the need for more upgrades to the plant or will the city build a new plant to serve development on the east side of the freeway?</p>	6.232

		<p>If all the effluent from new development on the east side of the freeway and the infill development is all going to the existing plant, then the existing trucklines and other pipelines be able to convey the wastewater to the plant or will there be major pipeline upgrades across the city to the plant.</p> <p>The information about wastewater is very important for the future of the city and City Council and LAFCO needs to know what is being planned. Please expand this section.</p>	
4.8-4		<p>Stormwater basin...you should include A street basin and the north Blosser Basins as they are the biggest basins in the city.</p> <p>The Blosser Channel drops into the Blosser basin for infiltration and Water quality improvement before spilling into the Santa Maria River.</p> <p>It should include a fourth bullet that describes the Green Canyon Water shed and all of the improvements that have been constructed over the last 30 years to convey storm water through the southern portion of the city. The water conveyance starts with the Bradley square project with the channel and pipeline to the two basins at McCoy Lane the water then moves through the government center. There is a pipeline at the Miller Street and Betteravia intersection that takes the water through the OHS center then across Broadway through the west side to the Battles Channel and then to the Hobbs Basin. Prior to all of these improvements there was yearly flooding at Miller and Betteravia and in the residential areas on the west side of town.</p>	
4.8-5		<p>Solid waste section needs more details.</p> <p>First this section needs to go over the process to establish the Los Flores Landfill and when it will be open and operational.</p> <p>Second, what will happen to the closure of the existing landfill? When will this happen? The land fill will still operate as a transfer station.</p> <p>Third there is no discussion about the food organic waste tha tis now required to be pick up for residential and commercial food related businesses.</p> <p>Fourth Need to have a discussion about the hazardous waste collection and how that is going to operate in the future .</p>	

6.232

6.233

6.234

		Fifth, why is the city considering hauling trash to Cold Canyon landfills, it is very far to travel daily? Is this correct? Is this only temporary until the Los flores Landfill is operational?	6.234
4.8-13	3	This paragraph needs to be revised to clearly state the City of Santa Maria has already installed a major water trunk line from the water tanks east of the city to Panther Drive. This trunk line will serve the annexation area.	6.235
4.8-14 4.8-15		This section indicates that the plant can serve full buildout of the general plan and annexation area. The question is if the plant is currently operating at 9.99 MGD and the proposed 16,140 units is 50% of the existing units then would not the new effluent be 5 MGD for a total of 15MGD which will exceed the sewer plant capacity. It does appear that the plant will need to be expanded so will the city be looking at upgrades in the future. It looks like the east side will not need a separate plant. If not, where are the major trunk lines that will convey effluent from the east to the existing wastewater plant? Are they sized correctly for future additional sewer? This information needs to be in this EIR document to confirm that the city will be able to serve the east side feasibly.	6.236
4.8-16 4.8-17		Again, this section lacks the needed information on how storm water conveyance will be handled on the east side of the freeway. How many access points are there along the levee to discharge storm water to the river? Or does the storm water follow the current drainage system to Jim May Park and then to the Blosser Basin and then to the river. This information needs to be part of this EIR and not deferred to a future analysis. If this regional drainage plan is not addressed, it could be a fatal flaw on the development of the annexation area. This cannot be deferred for future projects to figure out.	6.237
4.8-16		Already provided suggested changes to these goals and policies in the hydrology section and in the general plan.	6.238
4.8-17	1	This EIR should provide enough information for the overall regional infill drainage improvements for the 8,000 to be built as well as the annexation area. How will the drainage be conveyed to the river is the most important issue for the annexation area?	6.239
4.8-18		This whole page should be referring to and incorporating information from the 2024 annual report of the Santa Maria Valley Basin	6.240

		Management plan. This document has so much information about the health and management of the groundwater basin along with many great exhibits. I refer to this document anytime there are questions or discussions about the basin. On page 38-39 is the discussion on the projected water use by 2040 and the whole city with build out will be 18,700 AF. This information needs to be added to this section.	6.241
	3	What is the City's Water Shortage Contingency Plan? When was it adopted and how often is it updated?	6.242
4.8-19	1	A 20% reduction would result in water use to be 85 gallons per day per capita	6.243
	3	This section should also include reference to the 2024 Basin Management Plan because it has the best information about the basin water supply and the water use throughout the basin. And note that the total city water use by 2045 will be estimated at 18,700 AF.	6.244
4.8-20	3	Again, the question is did the city decide not to build the Los Flores Landfill and instead plan on future trash transported to the Cold Canyon Landfill about 30 miles north of Santa Maria? The city staff report on December 5, 2023 still refers to the city use of the Los Flores landfill in the future. Please correct the record. What is the city going to do with the 1,500-acre Los Flores property if it is not going to be a landfill??	6.245
4.8-21	5	This paragraph needs to state the existing water use, projected new water and the total in 2045 at full build out. Has the city determined what water lines in the city will need to be upgraded if there is 8,000 more units in the city????	6.246
4.8-21	6	As noted earlier the math does not seem right and there could be up to 15MGD at full buildout which means there would have to be more upgrades to the plant. Please provide how the math was done. Also what major trucklines will need to be upgrades to serve the east side of the freeway.	6.247
4.8-22		Please correct the last paragraph about where future trash will be hauled to and what is planned for Los Flores?	6.248
4.9 Effects Found Not to be Significant			
4.9-1	3	Revise the second sentence. There is no view of the Santa Maria River except from the 101 bridge or the levee trail located to the north of the city. Name the ridges, rolling hills and the mountains to the east. Also note the Solomon Hills and Casmalia Hills to the south.	6.249

		This paragraph needs to include the newly adopted Objective Design Standards for housing and mixed-use projects.	6.250
	4	...and Objective Design Standards....	6.251
4.9-2	1	This paragraph is a repeat of Paragraph 3 on the previous page and should be deleted. If keep it needs to be rewritten per the comments above.	6.252
	2	Rewrite Policy REC-8.1 Protection of recreation use. Preserve and expand public parks and the levee trail that provide recreational, ecological and scenic benefits for residents. This is an important amendment because there is no publicly owned and designated open space in the city. The only designated COS is in active urban agricultural uses and privately owned.	6.253
	5	This paragraph references Executive Order N-79-20 requiring construction trucks will by electric by 2035. This order is not listed or considered in the Air Quality chapter fo this EIR or on page 4.2-23. This should be added and considered in reductions to AQ and GHG impacts.	6.254
4.9-3	1	Suggest listing all of the counties that 3CE serve.	6.255
4.9-5		Action S-1.1.4 Most of the historic buildings are single story and wood construction. How many buildings are constructed with unreinforced masonry material?	6.256
		Delete Action S-1.2.1 this is already in the Building Code and the zoning ordinance.	6.257
4.9-6		Action S-1.3.1 this action item can be deleted as this is already required by the building code. This will save the city time and money.	6.258
4.9-7	1	The reference to the escarpment should be clear that is about 20-30 feet in height and is not subject to landscapes in the City of Santa Maria or the annexation area.	6.259
4.9-8	1	This parfrahg needs to be revised. The first sentences need to state that “Areas of expansive soils are known to be unlikely within the city limits.. they are known to be in the southern portion of the Orcutt area.,”	6.260
	3-4	This paragraph needs to be revised to state that over 100 years of development and construction in the city of Santa Maria and Orcutt there have been paleontological Resources found. The santa Maria valley has been historical flooded by the Sant Maria river and the Orcutt area s consist of historic sand dunes.	6.261
4.9-11	2-4	Ther is no mention of Allan Hancock college site and the 8-10 new elementary school sites and 3 junior high sites and 2 new high school sites.	6.262

		Need to include a map that shows how far existing and new school sites are from 101 and other truck routes through the city. Do the schools need to be .25 miles from these truck routes?	6.263
	5	This EIR should include a map that locates where these 90 active hazard sites are located. Are you including active and historic oil wells in this number?	6.264
4.9-12		This page should remove references to City Petroleum Engineer. Refer to new state law about setbacks for new oil development up to 3,200 feet from existing residential areas. Action S.4.1.3 and Action S-4.1.6 seem to be saying the same thing and one of them should be deleted.	6.265
4.9-13		Action S-4.2.5 does the city issue any permits for the railroad operations. Are they exempt from city permits?	6.266
4.9-15		Need a page break between the two action items	6.267
4.9-18	6	There is no land in the city that is zoned for agriculture. Ther are lands that are zoned for urban use that are currently in urban agricultural production. The second sentence needs to be revised “...the 2045 General Plan provides for the framework for development of up to 16,140 net new primary and up to 1,300 accessory units. The units will be distributed with 8,000 units as infill units and 8,140 units in the proposed 980 acre annexation area.”	6.268
	7	The last sentence seems contrary to the requirement for infill development including ADU and JADU. This sentence should be revised to state that all neighborhoods can potentially have infill units.	6.269
4.9-19		Action LU-1.1.2 this action item should be deleted as the ODS has already been adopted or revised to state this.	6.270
		Policy LU-1.2 delete the word deteriorating and replaces it with existing neighborhoods Revise the next sentence with “Accommodate growth while respecting surrounding agricultural lands outside of the adopted Sphere of Influence.”	6.271

		Policy LU-1.3 Areas of Change need to include reference to the annexation areas for the development of 8,000+ units and related other uses including schools, parks, commercial etc.	6.271
		Policy LU-1.5 There is no mention in the Elements or this EIR what the current job housing balance. What is it and how	
4.9-21	1	There is no mention of the mining that has been done in the Santa Maria Riverbed for gravel and sand for construction and other uses.	6.272
4.9-22		This paragraph should include the fact that there will be at least two more RHNA cycles and new housing assessments during the life of this 2045-2050 General Plan.	6.273
4.9-23		<p>Fire Protection section needs to be expanded to provide existing setting for fire service including how many fire stations and how many current fire fighters are in the city, Then this section needs to provide details on the future needs of the fire department including how many fire stations will be needed as the city densifies with infill development and the future annexation areas. How many fire fighters will be needed and how many new fire stations? And how will they be funded?</p> <p>This EIR and General Plan should have provided these details now for the City Council to make an informed decision for future needs.</p>	6.274
		<p>The Police section needs to be expanded to include existing number of police officers and the existing police station and the needs for the future include how many more offices needs and will there be new substations in the north and east of the city?</p> <p>This information is needed to inform the city council about the future and how these services will be funded.</p>	6.275
		<p>The school section is sorely lacking in information about how many new schools are going to be needed for 16,140-unit residential units.</p> <p>8 new elementary school sites need to be 10-12 acres 3 new Junior high sites are 20 acres in size and 2 High schools are 40-60 acres in size</p> <p>This is approximately 200 plus acres of school sites. Where will these sites be located? How is there going to be new school sites in the infill areas of the city? There is very little land of these sizes in the existing city. What are the plans for the annexation areas for new school sites. This is information that the City Council and LAFCO will need to make an informed decision about the future of the city.</p>	6.276

		<p>There is also no information about the plans for Allan Hancock College and there should be because it is a very important part of the future education of the residents of Santa Maria and future job growth</p>	6.276
4.9-24		<p>This whole Park and Recreational Facilities section is fatally flawed as there is not enough land in the city to meet the old standards.</p> <p>O keep the current standards of 2.5 acres per 1,000 residents the city will need to obtain another 145 acres of park land and sports fields. With half of these future residents in the infill of the city at least 75 acres of additional parkland would need to be found and it does not exist. An additional 75 acres would be planned for the annexation areas.</p> <p>What is worst is if the city maintains that old standard of 5 acres per 1,000, then there would be the need to find 300 acres of additional land for future parks.</p> <p>This section needs to provide details on where all this parkland will be found and how much it will cost the city over the next 30 years. This is a significant impact unless the city changes the policy to only require the same ratio of 2.5 acres per 1,000 that currently what the city has accomplished over the last 30 years or even reduce the acreage ratio to less in order to save costs in the future.</p> <p>This is a critical issue that needs to be fully analyzed in this EIR so the City Council can make an informed decision or the other option is to annexation of a whole lot more land for schools and parks</p> <p>The footnote at the bottom of this page needs to add other calculations including 5 acres per 1,000 at full build out would be about 840 acres and again this is infeasible and unaffordable.</p> <p>Also, there is no mention of the parkland at Los Flores and how much money the parks department has spent at that park. If these 300+ acres are included in these acre numbers maybe the city can meet the 2.5-acre number.</p> <p>Finally, the last sentence on indicates that the only way to fund these hundreds of acres of park land and construction is to have future dwelling units pay for them...this is infeasible.</p>	6.277

		Please answer all these questions in this section.	6.277
4.9-25		<p>Library...it should be noted that libraries are experience a 30% reduction of use based on access to the internet and other technology.</p> <p>Also all new school sites have library resources.</p> <p>Where would new library buildings be located if needed. Agree that there are many commercial and office buildings that could be used for satellite library services.</p>	6.278
		<p>Wildfire analysis is wrong.</p> <p>This section needs to note that a majority of the city of santa Maria is surrounded by active agricultural production that limits potential for wildfires. The recently approve new CalFire map indicates that there is a potential for fire hazard in the Santa Maria Riverbed and in the Solomon Hills area south of Orcutt</p>	6.279
4.9-26		Add a note that SMAPD now serves as the aerial firefighting base for CalFire.	6.280
5. Other CEQA Required Discussions			
5.1	2	What is the current job housing balance number? How is this plan going to meet a 1.2 job housing balance?	6.281
5.1		Policy LU-1.1 there is no definition in this document of in the elements of what a complete community means. This is very important to be clear as to what the city is looking for in the future.	6.282
		Why is there not an action item for the future planning of the annexation areas? This should be the highest priority for the city to plan the area east of the freeway.	6.283
5-2		As noted, previously this policy needs to be revised to state,,, respecting agricultural outside of the new SOI and annexation area by adopting the No Urban Growth Boundary agreement.	6.284
5-3		Also refer to the No Urban Growth agreement on areas outside of the new SOI and annexation area.	6.285
5-4	4	<p>This paragraph needs to be revised to state that no known arch sites have been identified in the city over the last 35 years and they are not expected to be found north of Betteravia so there would not be impacts north of Betteravia.</p> <p>Even south of Betteravia it is unlikely to find resources since there has been so much agricultural activities on the undeveloped and.</p>	6.286
6 Alternatives			

6.1		As noted previously the agricultural Identity objective needs to be revised or it will be used against the city by LAFCO for the proposed annexation areas.	6.287
6.4	4	Revise the words urban footprint to “city boundary” Delete or revise the second and third sentences as all of the MM are standard requirements and would apply today for current development projects except housing projects that are exempt from environmental review.	6.288
6-4		Revise the cultural Resource section to reflect the previous comments about no resources north of Betteravia so no more surveys will be required,	6.289
6-4 6-5 6.6		Make changes to these sections based on the comments provided previously.	6.290
6-6		Please add in this Description paragraph that the in-fill alternative will have 16,000 units and commercial office development all within the existing city limits. This alternative is fatally flawed as there is no room in the city for 200 acres of new schools and 100’s of acres of new parks, The only way this kind of design could be accomplished is to allow many high-rise buildings and multi-level buildings on existing school sites. This would result in a negative impact on aesthetics.	6.291
		The ag section this alternative would retain the no Urban Growth Boundary in its current location. Delete the last sentence as most urban agriculture has urban land use designations on these lands for future development and these residentially designated lands have already been included in the Housing Element to meet RHNA numbers. This sentence is in error.	6.292
		All of the other sections need to be revised based on previous comments already made in this comment letter.	6.293
6-10		Alternative 3 Where is the map to show how many acres of land the Greater Annexation Alternative would plan? This alternative may be the best because it would give the city additional land for the building out as proposed along with the land for future school sites, and parks and the need for other services and job generating uses.	6.294
6-10-13		All these sections need to be revised per previous discussions.	6.295
6-14		The discussion on the infill Alternative avoids discussion on items that prove this alternative to be fatally flawed... Where will the 200 acres of new school sites be located? Where will hundreds of acres of parks be located?	6.296

		<p>What about the huge impact on aesthetics when the city is developed with high rise buildings and two to three-story school buildings on the existing campuses? This will be a significant impact.</p> <p>What about the water and sewer lines that will impact and need to be upgraded to serve 16,000 units in the existing city?</p> <p>The infill option has only one net benefit impact and that is on agricultural</p>	6.296
6-14		<p>Table 6-1 this table should be formatted to be on one page to make it easier to ready.</p>	2.297

Letter 6

COMMENTER: Laurie Tamura, Principal Planner of Urban Planning Concepts, Inc

DATE: September 26, 2025

Response 6.1

The commenter expresses concern about the length of the review period for the Draft General Plan and Draft EIR, and states that several issues should be addressed before approval.

The Draft EIR was circulated for a 45-day public review period that began on August 14, 2025 and ended on September 28, 2025. Two public meetings were held to receive comments on the Draft EIR, including a virtual meeting on August 19, 2025 and an in-person meeting at the City of Santa Maria Public Library on August 20, 2025.

The commenter provides a summary of their forthcoming comments. No revisions to the Draft EIR are required in response to this comment.

Response 6.2

The commenter states that the document does not include information on how the annexation area will be developed to accommodate over 8,000 housing units and associated uses such as commercial areas, schools, parks, roads, and infrastructure.

The Draft EIR provides a program-level analysis of potential environmental impacts associated with potential growth in the annexation area, as discussed in Subsection 2.6.3, *Annexation*, of the Draft EIR, consistent with CEQA Guidelines Section 15168 (Program EIRs). The footnote on page 2-16, in Chapter 2, *Project Description*, of the Draft EIR explains that the City's annexation application would require approval by Santa Barbara County Local Agency Formation Commission (LAFCo). Project-specific details are required to be addressed through future planning and subsequent environmental review, if required, at such time as new development in the annexation area is proposed. Project -specific details are required to be addressed through future planning and subsequent environmental review by the applicable agency, if required, at such time as new development in the annexation area is proposed. No revisions to the Draft EIR are required in response to this comment.

Response 6.3

The commenter raises concerns that the Draft EIR does not identify locations for new schools to serve future residents. The commenter also raises concerns regarding overcapacity in schools.

The Draft EIR discusses potential environmental impacts to school services at a programmatic level in Subsection 4.9.3, *Public Services and Recreation*. The analysis concludes that impacts to school services from the 2045 General Plan Update would be less than significant. School site planning and land acquisition are the responsibility of local school districts and may occur at such time as proposed new development results in the need for new schools in Santa Maria. No revisions to the Draft EIR are required in response to this comment.

Response 6.4

The commenter raises concerns about the City's parkland standard, questions what parks are included in the parkland total, and notes the absence of discussion regarding park-related costs in the Draft EIR. The commenter recommends reducing the City's park policy.

The parkland area referenced in Section 4.9.8, *Public Services and Recreation*, of the Draft EIR is based on the total acreage of existing City of Santa Maria parks. This data is presented in the table titled "Existing Parks" on page 97 of the City's Land Use and Community Design Existing Conditions Report, referenced in the Draft EIR. The Draft EIR does not discuss fiscal impacts of future development and maintenance as CEQA does not require analysis of fiscal impacts unless they have the potential to result in a physical environmental impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.5

The commenter states that the Draft EIR does not include information regarding necessary upgrades to water and sewer trunklines throughout the city or how wastewater treatment would be provided for the annexation area. They ask whether a new treatment plant is proposed or if effluent would be conveyed through existing major trunklines to the current facility. The commenter also raises questions about the extent of expansion needed at the existing plant to accommodate an increase in capacity and associated costs.

Section 4.8, *Utilities and Service Systems*, of the Draft EIR addresses water and wastewater service capacity. The analysis concludes that implementation of the 2045 General Plan Update would increase demand for water, wastewater, and solid waste services, but these impacts would be less than significant due to existing system capacities, City policies, and compliance with applicable regulations. The costs of Infrastructure planning for future development are not evaluated in the Draft EIR, as CEQA does not require analysis of fiscal impacts unless they have the potential to result in a physical environmental impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.6

The commenter asserts that the Draft EIR does not adequately analyze the traffic impacts of a projected 50% increase in citywide traffic, lacks identification of roadway and intersection improvements needed to maintain LOS D, omits cost estimates for such improvements, and does not include a map of the proposed circulation system. The commenter states that the Noise section (Table 4.6-8) presents more detailed traffic-related data than is evaluated in the discussion of traffic impacts.

Section 4.7, *Transportation and Traffic*, of the Draft EIR evaluates potential traffic impacts based on vehicle miles traveled (VMT), consistent with CEQA Guidelines Section 15064.3, which replaced level of service (LOS) as the metric for determining transportation impacts under CEQA. While LOS is no longer considered a CEQA impact, it is discussed in the Draft EIR for informational purposes, including in Table 4.6-8 (Traffic Noise Modeling Data) and related discussions in Section 4.6, *Noise*. Section 4.7, *Transportation and Traffic*, of the Draft EIR also includes a list of proposed policies under the 2045 General Plan Update related to transportation planning and improvements. A map of the existing circulation system is also provided in the General Plan as Figure 4.7-1, Current Circulation Element Roadway Functional Classification. CEQA does not require analysis of fiscal

impacts or identification of specific roadway improvements unless they have the potential to result in a physical environmental effect. No revisions to the Draft EIR are required in response to this comment.

Response 6.7

The commenter states that the Draft EIR and General Plan documents do not include a map or discussion of the approximately 1,500-acre Los Flores Park area owned by the City of Santa Maria, including the status or future plans for a previously proposed 300-acre landfill. The commenter questions why the EIR references hauling waste to Cold Canyon Landfill by 2034 instead of utilizing the City-owned site. Additionally, the commenter states the absence of discussion regarding the Los Flores park area, including trails and amenities funded by park and general funds, and requests clarification on future plans for this site.

The Draft EIR discusses solid waste disposal in Section 4.8, *Utilities and Service Systems*, which states that the Santa Maria Regional Landfill is expected to remain operational through 2034, and that after operation of the Santa Maria Regional Landfill ends, the City may divert waste to nearby facilities such as the Cold Canyon Landfill, which has sufficient capacity and is anticipated to operate through 2040. The Draft EIR concludes that regional landfill capacity is adequate to accommodate the increase in solid waste generated by buildout of the 2045 General Plan Update and that no significant impacts related to landfill capacity are expected.

Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. Because the 2045 General Plan Update does not include future development plans for the Los Flores Park area mentioned by the commenter, the Draft EIR does not evaluate the potential environmental impacts of such development, as such an evaluation would be speculative at this time. No revisions to the Draft EIR are required in response to this comment.

Response 6.8

The commenter raises concerns about references to future environmental review.

The Draft EIR provides a program-level analysis consistent with CEQA Guidelines 15168 for long-range planning documents. As the 2045 General Plan Update does not include proposals for specific projects and it is not possible to know project specific details, including heights and density, at this time, the analysis within the Draft EIR analyzed the potential impacts that would result from implementation of the plan. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. Because the 2045 General Plan Update does not include future development plans for specific developments projects, the Draft EIR does not evaluate the potential environmental impacts of future potential development at a project level of detail, as such an evaluation would be speculative at this time. If required and necessary, environmental analysis of future projects may be conducted for projects facilitated by the 2045 General Plan Update at the time that they are proposed. No revisions to the Draft EIR are required in response to this comment.

Response 6.9

The commenter suggests editorial changes which do not pertain to the adequacy of the Draft EIR or CEQA. This specific instance of editorial changes relates to the order the General Plan Update Elements are listed in the Executive Summary of the Draft EIR.

The commenter requests changes that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis. Therefore, this comment does not require a formal response pursuant to CEQA Guidelines Section 15088(a), which states that lead agencies are required to evaluate comments on environmental issues raised in the Draft EIR and prepare written responses. Comments that do not relate to the adequacy of the environmental analysis, such as those focused on editorial changes, planning policy or implementation details outside the scope of the EIR, do not require a formal response under CEQA.

As this comment does not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response.

Response 6.10

The commenter suggests changes to the General Plan Update's objectives.

This comment pertains to the 2045 General Plan Update and does not raise a question or concern regarding the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update are noted and will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.11

The commenter requests additional detail in the Executive Summary regarding the project description, growth assumptions, and infrastructure needs for each alternative.

The Draft EIR Executive Summary provides a high-level overview of the alternatives, consistent with CEQA Guidelines Section 15123, which describe the purpose of the Executive Summary in an EIR. Detailed descriptions of each alternative are provided in Chapter 6, *Alternatives*, of the Draft EIR. No revisions to the Executive Summary of the Draft EIR are required in response to this comment.

Response 6.12

The commenter suggests revising a statement within the Executive Summary section of the Draft EIR regarding areas of known controversy.

The City circulated a Notice of Preparation (NOP) for the Draft EIR from February 15, 2025 through March 17, 2025 and received seven written responses from the public and government agencies. Chapter 1, Introduction, of the Draft EIR summarizes all comments received during the Notice of Preparation process, and describes areas of known controversy based on the comments received during the scoping process. Expansion of the annexation area into agricultural land was not identified as an area of controversy during the scoping period for the Draft General Plan EIR. The following language has been added to Chapter 1 of the Draft EIR:

The Draft EIR was circulated for a 45-day public review period that began on August 14, 2025 and ended on September 28, 2025. Two public meetings were held to receive comments on the Draft EIR, including a virtual meeting on August 19, 2025 and an in-person meeting at the City of Santa Maria Public Library on August 20, 2025. The City of Santa Maria received nine comment letters on the Draft EIR. Comments on the Draft EIR and responses are provided in Chapter 2 of the Final EIR.

Potential impacts to prime agricultural land are addressed in Section 4.1, *Agricultural Resources*. This section determined the 2045 General Plan Update would result in the conversion of agricultural lands, including Important Farmland and lands under Williamson Act contracts (though currently in nonrenewal), particularly within the annexation area. While the plan includes policies to minimize impacts, these measures would not fully avoid or mitigate the loss of farmland. Therefore, the impact is considered significant and unavoidable.

Response 6.13

The commenter anticipates that updates to mitigation measures may be necessary and suggests that Table ES-1 is updated accordingly.

If changes to mitigation measures are warranted through the responses to the Draft EIR, such changes would be noted in the Final EIR including updates to the Table ES-1 in the Executive Summary. The commenter is not suggesting any changes to mitigation measures in this comment, so no revisions to the Draft EIR are required in response to this comment.

Response 6.14

The commenter recommends extending the General Plan horizon year to 2050.

This comment does not pertain to the analysis presented in the Draft EIR but rather is a comment on the Draft General Plan. The commenter's preference will be provided to decision-makers for their consideration. For context, the 2045 date was selected based on three Regional Housing Needs Allocation cycles (24 years) and a start date of the General Plan Update planning process in 2020. No revisions to the Draft EIR are required in response to this comment.

Response 6.15

The commenter requests additional historical detail on past annexation efforts. The commenter also requests editorial changes which do not pertain to the adequacy of the Draft EIR or CEQA.

The Draft EIR evaluates the 2045 General Plan Update in a manner consistent with CEQA Guidelines Section 15124, which outlines the required contents of a Project Description for an EIR, including a description of the project's objectives, intended uses, and a general statement of the project's location and setting. While the Draft EIR does not include a detailed history of the 1993 Sphere of Influence and annexation plan, it acknowledges that the 2045 General Plan Update builds upon the City's long-range planning framework, including prior annexation efforts. Additional historical and environmental setting information may be found in the City's General Plan Update materials available on the Imagine Santa Maria General Plan Update website. This includes the Draft General Plan, background reports, and maps that provide context for the planning area and proposed annexation. For more detailed historical documentation, including the 1993 Sphere of Influence Expansion EIR (SCH #90010930), the commenter may contact the City of Santa Maria Planning

Division to request archived planning documents. No revisions to the Draft EIR are required in response to this comment.

For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9.

Response 6.16

The commenter suggests that the General Plan be labeled as a 2025 plan and expresses concern that the document refers to itself as a “blueprint” for the city, despite being a policy document without specific development plans. The commenter also requests that the language be revised to clarify that the bullet points listed on page 1-1 of the Draft EIR are not specific projects included in the General Plan or the Draft EIR.

The Draft EIR evaluates the potential environmental impacts of the 2045 General Plan Update, which is a policy document that does not include proposals for specific development projects. The Draft EIR provides a program-level analysis of the potential environmental impacts that could result from implementation of the plan, consistent with CEQA Guidelines Section 15168 (Program EIRs). The reference to the General Plan serving as a “blueprint” reflects its role in guiding future land use and development decisions, not in prescribing specific development plans. The bullets referenced in the comment are intended to summarize the plan’s guiding objectives and are not proposed projects included in the General Plan or the EIR. If required and necessary, environmental analysis of future projects may be conducted at the time they are proposed. No revisions to the Draft EIR are required in response to this comment.

Response 6.17

The commenter suggests the EIR should more explicitly state its purpose and include specific growth assumptions throughout.

Chapter 1, *Introduction*, Subsection 1.1.2, of the Draft EIR states that the purpose of the EIR is to inform public agency decision-makers and the public about the significant environmental effects of the 2045 General Plan Update, identify ways to minimize those effects, and describe reasonable alternatives, consistent with CEQA Guidelines Section 15121(a) and Section 15168 for Program EIRs. Growth assumptions are addressed throughout the EIR, particularly in Subsection 2.4.5, *Proposed 2045 General Plan Buildout*, Subsection 4.9.7, *Population and Housing*, and Section 5.1, *Growth Inducement*, of the Draft EIR, which discuss the potential for population increases and the potential environmental effects of development facilitated by the 2045 General Plan Update. No revisions to the Draft EIR are required in response to this comment.

Response 6.18

The commenter states that a full EIR on the infill and annexation for the city should have been prepared opposed to a programmatic one.

A Programmatic EIR was prepared consistent with CEQA Guidelines Sections 15168 (Program EIRs) and 15121(a), which allow a broad, policy-level analysis for long-range planning documents such as a General Plan Update. As explained in Subsection 1.1.2, *Purpose and Legal Authority*, on page 1-2 of the Draft EIR, this approach evaluates the potential environmental impacts of implementing the

General Plan at a conceptual level, while future site-specific projects will undergo additional CEQA review as needed. No revisions to the Draft EIR are required in response to this comment.

Response 6.19

The commenter asks that a paragraph in Chapter 2, Project Description, of the Draft EIR be revised to correctly list the required and optional General Plan elements in the order specified by State law and to note that the General Plan horizon year should be 2050.

This comment focuses on editorial edits that do not pertain to the analysis presented in the Draft EIR nor would it change the analysis in the Draft EIR. For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9.

Response 6.20

The commenter asks that a footnote be revised to clarify that any development within the Sphere of Influence can and will be processed by the City of Santa Maria for annexation, with the County acting as a responsible agency for the annexation application.

The footnote on page 2-1 of the Draft EIR, in Chapter 2, *Project Description*, defines the Sphere of Influence and describes its purpose for the purpose of the Draft EIR. The footnote on page 2-16, in Chapter 2, *Project Description*, of the Draft EIR explains that the City's annexation application would require approval by LAFCo. Project-specific details are required to be addressed through future planning and subsequent environmental review, if required, at such time as new development in the annexation area is proposed. The applicable agency would oversee planning and subsequent environmental review, if required. No revisions to the Draft EIR are required in response to this comment.

Response 6.21

The commenter requests that Figure 2-1 include areas outside of the city of Santa Maria including the 1,500 acre Los Flores property to the southwest of the Orcutt area. The commenter states that there will be a 300 acre landfill in this area.

The Draft EIR evaluates the 2045 General Plan Update and annexation areas anticipated within the General Plan Update. The Los Flores property referenced by the commenter is located southwest of the Orcutt area, and is outside of the City and its Sphere of Influence. The 2045 General Plan Update does not include or discuss plans for the alteration of Los Flores Park. The Draft EIR cannot evaluate the environmental impacts of a project that is not proposed as part of the 2045 General Plan Update as such an evaluation would be speculative at this time. No revisions to the Draft EIR are required in response to this comment.

Response 6.22

The commenter asks that a paragraph on page 2-4 in Chapter 2, Project Description, be revised to correct the description of Santa Maria's location relative to U.S. 101, add information about a City-owned service road and water storage tanks, include details on the 1,500-acre Los Flores property (noting parks, trails, and a potential future landfill), and move the last sentence of the paragraph to the following paragraph.

In response to this comment, the following revision to Chapter 2, *Project Description*, has been made on page 2-4:

The linear portion of Santa Maria is located on the east side ~~west side~~ of U.S. 101.

The remainder of the comment pertains to areas outside the scope of the 2045 General Plan Update or, similar to comment 6.9 above, includes editorial suggestions which would not alter the adequacy or analysis within the Draft EIR. Therefore, other than the revision to the cardinal direction above, no revisions to the Draft EIR are required in response to this comment. For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9.

Response 6.23

The commenter asks that the EIR include references to regional transit services provided by the Santa Maria Organization of Transportation Helpers (SMOOTH) and other medical or senior carriers and also include the Santa Maria Valley Railroad in the discussion of regional rail services.

The Draft EIR identifies major regional transportation providers relevant to the 2045 General Plan Update in Section 4.7, *Transportation and Traffic*, Subsection 4.7.1, *Setting*, and references regional rail services in Chapter 2, *Project Description*, Section 2.4, *Regional Setting*, and in Chapter 3, *Environmental Setting*, Section 3.1, *Setting*. The commenter's requested edits are informational and are not required to support the environmental analysis in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.24

The commenter asks that a paragraph on page 2-4 of Chapter 2, Project Description, describe Santa Maria as the largest city in Santa Barbara County, as opposed to a suburban residential community. They also suggest that there are acreages listed in this paragraph that conflict with those listed in Table LU-1. The commenter also states that most of the 4,500 acres are in the Orcutt area and largely developed, and they request removal of three sentences due to these sentences being incorrect, according to the commenter.

The Draft EIR reflects the best available data from the City's Land Use and Community Design Existing Conditions Report. The acreage referenced in the Draft EIR is provided on page 12 of the City's Land Use and Community Design Existing Conditions Report. The Draft EIR does not include a Table LU-1. Table LU-1 in the General Plan Land Use Element has been removed in the final version of the General Plan.

In response to this comment the following revision to Chapter 2, *Project Description*, Subsection 2.3.2, *Local Setting*, has been made:

The City of Santa Maria is characterized as a suburban residential community. The plan area covers approximately 15,058 acres within the city limits and approximately 4,500 acres within the SOI (City of Santa Maria 2020). ~~Approximately 27 percent of land within Santa Maria is occupied with residential uses, primarily consisting of single-family residences (22 percent). Agricultural uses occupy 14 percent of the city, airport uses occupy 11 percent, public and institutional uses occupy 11 percent, and commercial uses occupy 7 percent. Approximately 19 percent of the city is comprised of vacant land.~~ Residential land uses are distributed throughout the city. Non-residential land uses, including industrial and commercial, commonly line major

corridors in Santa Maria, including Broadway, Main Street, and Betteravia Road. Agricultural and vacant uses are located at the periphery of the city. The city is underlain by the Santa Maria River Valley Groundwater Subbasin. The local climate in Santa Maria is identified as a Mediterranean climate characterized by warm, dry summers and cool, moist winters.

The additional detail requested by the commenter regarding the 4,500 acres being mostly developed is not necessary for the adequacy of the Draft EIR and would not alter the conclusions of the environmental analysis.

Response 6.25

The commenter suggests another occurrence of incorrect acreage.

As mentioned above in Response 6.24, the Draft EIR reflects the best available data from the City's Land Use and Community Design Existing Conditions Report. The commenter does not provide sufficient conflicting information or data to warrant a correction. As a result, no revisions to the Draft EIR are required based on this comment.

Response 6.26

The commenter notes that Public Facilities, Recreation and Parks, and Economic Development are optional General Plan elements. The commenter requests that these elements be identified as optional.

In accordance with the State of California Office of Land Use and Climate Innovation General Plan Guidelines (2017), the Public Facilities, Recreation and Parks, and Economic Development Elements of the General Plan are not required. The commenter's requested edits are informational and do not affect the adequacy of the Draft EIR or alter the environmental impact analysis. No revisions to the Draft EIR are required in response to this comment.

Response 6.27

The commenter expresses disappointment that zoning updates were not completed alongside the General Plan Update.

The City will include an updated zoning map to be approved concurrently with the adoption of the 2045 General Plan Update. A comprehensive update to the City's Zoning Ordinance will be a future planning effort. Updating zoning maps and the City's Zoning Ordinance to be consistent with the 2045 General Plan Update land use designations would not result in a new or additional environmental impact. Therefore, no revisions to the Draft EIR are required based on this comment.

Response 6.28

The commenter suggests revising a paragraph on page 2-5 of Chapter 2, Project Description, of the Draft EIR to clarify that the General Plan Update is limited to goals and policies, without accompanying land use or zoning plans. They note that the document does not illustrate how the proposed 8,000 infill units will be developed or address planning for the annexation area.

Page 2-5 of Chapter 2, *Project Description*, of the Draft EIR includes a paragraph that discusses zoning in the context of State law. Specifically, this paragraph states that under Government Code Section 65860, a property's zoning must be consistent with its General Plan land use designation. It

also references Government Code Section 65860(c), which requires that when a General Plan is amended or updated in a way that creates inconsistency with the Zoning Ordinance, the zoning ordinance must be amended within a reasonable time to achieve consistency. This paragraph is intended to summarize applicable statutory requirements. The following paragraph describes the 2045 General Plan Update as containing goals and policies to base land use and resource decisions on but has no mention of land use or zoning plans. No revisions to the Draft EIR are required based on this comment.

Response 6.29

The commenter suggests including support for expansion of Vandenberg Space Force Base in the Vision statement.

The Vision reflects the City's broad goals and priorities as defined in the 2045 General Plan Update. This comment does not pertain to the environmental analysis presented in the Draft EIR. No revisions to the Draft EIR are required based on this comment.

Response 6.30

The commenter asks the City to revise the agricultural objective as noted in other sections.

Refer to Response 6.10 for a discussion of commenter's suggested changes to the 2045 General Plan Update's objectives.

Response 6.31

The commenter asks the City to revise the order of the General Plan Update Elements and to include the housing element in the bullet point list on page 2-7 of Chapter 2, Project Description, of the Draft EIR.

For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9.

Response 6.32

The commenter expresses concerns over the number of land use designations.

This comment pertains to the content of the 2045 General Plan Update, and not to the environmental analysis presented in the Draft EIR. No revisions to the Draft EIR are required based on this comment.

Response 6.33

The commenter asks whether the Entrada Specific Plan will be retired.

This comment pertains to the content of the 2045 General Plan Update, and not to the environmental analysis presented in the Draft EIR. No revisions to the Draft EIR are required based on this comment.

Response 6.34

The commenter states that the section lacks detail regarding planned land uses and zoning for the annexation area, which is expected to accommodate 8,000–9,000 residential units, commercial uses at interchanges, medical expansion, six new schools, 50 acres of parks, and employment-generating uses. The commenter asks if these details need to be included in the EIR, and recommends creating a concept plan on how the annexation area will be developed and suggests using the 1993 land use plan as a reference. The commenter also requests deletion of the phrase “and public land uses in annexed lands outside of the current city limits.”

As discussed in Response 6.8, the Draft EIR provides a program-level analysis consistent with CEQA Guidelines 15168 for long-range planning documents and does not require site-specific planning or design details. The preferred Land Use Alternative selected by the City Council notes that the proposed 985-acre annexation area would contain approximately 3,900 new residential units, not 8,000-9,000 units as the commenter mentions. An additional approximately 5,500 residential units would be located within infill areas within the existing city boundaries. A concept plan for the full build out of the proposed annexation area is not a part of the EIR for the 2045 General Plan Update and future planning efforts in coordination with property owners, including new Specific Plan(s), will be required. As noted on page 2-15 of Chapter 2, *Project Description*, of the Draft EIR, individual future projects may require separate environmental review under CEQA if they could result in impacts not addressed in the program-level analysis provided in the 2045 General Plan Update EIR. This clarification reinforces that while annexation is proposed, additional environmental review may be required for future development within the annexation area.

The deletion of words requested by the applicant are editorial in nature and would not impact the adequacy of the Draft EIR and would not change any analysis within the EIR. For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9. No revisions to the Draft EIR are required based on this comment.

Response 6.35

The commenter states that the maps in the Noise section are inaccurate because they do not show most of the sound walls installed along U.S. 101, which are intended to reduce community noise impacts. They identify this as a significant error that should be corrected in Figure 2-6, the Noise Element, and throughout the EIR.

The noise modeling presented in the Draft EIR is based on a conservative assumption that does not account for potential noise-reducing features such as topography, vegetation, sound walls, or other structures that may attenuate noise from transportation sources along area roadways. As a result, actual conditions may be lower than the projected noise levels described in the Draft EIR, ensuring that the analysis remains protective of noise-sensitive receptors. Figure 2-6 in Chapter 2, *Project Description*, and the Noise Element Figure N-3 show generalized noise conditions based on conservative assumptions and may not reflect all local features that may reduce noise levels, such as topography, vegetation, sound walls, or other physical barriers. In some locations, actual noise levels may be lower than those shown. The figures are intended to support City decision-making and should not be read as representing precise, site-specific conditions or all existing noise-reduction infrastructure. No revisions to the Draft EIR are required in response to this comment.

Response 6.36

The commenter states there are errors in Figure 2-3 of Chapter 2, Project Description, including incorrect land use designations for the landfill, Santa Maria Cemetery, airport areas, Area 7, and Betteravia Plaza. They note that Special Planning (SP) lands are not shown and request that Figure 2-3 be corrected to reflect accurate land use designations.

In response to this comment, Figure 2-3 in Chapter 2, *Project Description*, has been revised to update the land use designations for the landfill, *Santa Maria Cemetery, airport areas, Area 7, and Betteravia Plaza*.

Response 6.37

The commenter indicates potential errors but does not specify a specific issue or provide conflicting information or recommended corrections.

No changes to the Draft EIR are required in response to this comment.

Response 6.38

The commenter requests inclusion of an eastern island area in the annexation discussion. They also suggest that Figure 2-5 of the Draft EIR feature a concept layout illustrating the planned development of 8,000-9,000 units and associated uses. At minimum, they recommend including a list of anticipated needs for buildout within the annexation area.

The Draft EIR provides a program-level analysis consistent with CEQA Guidelines and does not require site-specific planning or design layouts, which have not yet been developed for the annexation area. Figure 2-5 in Chapter 2, *Project Description*, of the Draft EIR identifies the planned boundary of the proposed annexation area. The eastern island the commenter refers to is already incorporated into the city limits and does not require annexation. As stated in Response 6.8, the 2045 General Plan Update does not propose specific new development or individual projects, and it is not possible to evaluate project-specific details such as the layout of the future units in the annexation area, as it would be speculative at this time. No revisions to the Draft EIR are required based on this comment.

Response 6.39

The commenter states that the Figure 2-6, in Chapter 2, Project Description, is inaccurate, as it does not reflect existing sound walls along U.S. 101 and other areas such as Blosser Road. The commenter requests that the map be revised to account for these noise-reducing features.

Refer to Response 6.35 for a discussion of projected noise levels and noise attenuation from sound walls in figures.

Response 6.40

The commenter recommends extending the planning horizon of the General Plan Update to 2050, citing the lengthy process to date and the substantial work that remains to be completed.

For a discussion of the extension of the General Plan horizon year, refer to Response 6.14.

Response 6.41

The commenter requests that Figure 2-1 be revised, noting inconsistencies with other tables that use different acreages.

For a discussion of comments, recommendations, and requests related to the description of the City of Santa Maria, refer to Response 6.24.

Response 6.42

The commenter requests clarification on the location and interpretation of the 1,504 acres of non-residential development referenced on page 2-14 of Chapter 2, Project Description, of the Draft EIR, asking whether the area is within city limits and currently undeveloped, or if it includes other areas targeted for future development. The commenter also expresses confusion about the bullet points, particularly the meaning of the 463 acres of commercial use shown in parentheses and whether this reflects a potential loss or zoning change that could impact sales tax revenue. Additionally, the commenter questions the reference to 7 acres of airport use and suggests that a map be included to help clarify the information presented in the table.

The acreages listed on page 2-14 of Chapter 2, Project Description, of the Draft EIR, reflect net changes associated with the 2045 General Plan Update. Parentheses indicate reductions in acreage relative to existing conditions, as stated on page 2-14 of Chapter 2, Project Description. As such, the parenthetical "(463) acres of commercial uses" shown in Subsection 2.6.5, Proposed 2045 General Plan Buildout, indicates that the city would experience a reduction of approximately 463 acres of commercial uses through 2045. The Draft EIR provides a program-level analysis and does not include parcel-specific mapping of these changes. No revisions to the Draft EIR are required based on this comment.

Response 6.43

The commenter states that the percentages listed on page 2-14 of the Draft EIR are incorrect and should be revised. The commenter also states that there are no lands in the city classified as vacant or agriculture, and all lands have city land use and zoning for future development.

Refer to Response 5.2 for a discussion of conversion of agricultural lands in the city and refer to Response 6.24 for a discussion of revisions to the Final EIR regarding percentages of land occupied by land use types. No land within city limits is designated or zoned specifically for agriculture; agricultural uses operate as transitional uses until development is planned for an area. No revisions to the Draft EIR are required in response to this comment.

Response 6.44

The commenter states "Through 2050..." in reference to page 2-15.

The City acknowledges the commenter's interest in extending the 2045 General Plan Update horizon year to 2050. This topic is addressed in Response 6.14.

Response 6.45

The commenter states that the paragraph should clarify that most future housing projects will be exempt from CEQA based on newly adopted state laws. The commenter also states that the City will use this EIR as the primary environmental document for most future projects to streamline permitting and reduce costs, with only a few projects, such as future annexations, requiring additional review. They request adding this clarification to the “Intended Use of this EIR” section.

Section 2.7, *Intended Use of this EIR*, in Chapter 2, *Project Description*, explains that the EIR provides a programmatic review and can be used to focus environmental review for future activities under the 2045 General Plan. Section 2.7 also specifies that projects not anticipated by the 2045 General Plan or with effects not addressed in the EIR may require additional CEQA review. While the City recognizes that recent state laws may exempt certain housing projects from CEQA, this EIR is not intended to guarantee exemptions or replace CEQA requirements where applicable. Therefore, the existing Draft EIR language appropriately describes the intended use and flexibility of this document. As a result, no changes to the Draft EIR are required in response to this comment.

Response 6.46

The commenter suggests editorial edits or provides comments that do not pertain to the adequacy of the environmental analysis presented in the Draft EIR. Specifically, they recommend updating the City Zoning Map and Zoning Ordinance, rezoning properties to align with the General Plan, adding references to infrastructure needs (water, wastewater, parks, schools), deleting references to natural/capital resource preservation or restoration, and making future study requirements more specific.

They also request the City forward the plan to LAFCo for approval of the Sphere of Influence and annexations.

For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9. For a discussion of the timing of updates to the City’s zoning maps and the Zoning Ordinance following adoption of the 2045 General Plan Update, refer to Response 6.27.

The information provided by the commenter does not identify a new significant impact or provide substantial evidence of a deficiency in the environmental analysis. Therefore, no changes to the Draft EIR are required in response to this comment. However, as noted in the footnote on page 2-16 of Chapter 2, *Project Description*, the 2045 General Plan will be provided to Santa Barbara County LAFCo prior to a potential approval of the City’s annexation application. No changes to the Draft EIR are required in response to this comment.

Response 6.47

The commenter requests that the second sentence of Subsection 3.1, Setting, in Section 3, Environmental Setting, of the Draft EIR state that the Sphere of Influence will also be expanded to enable annexations. The commenter also states that it would be more efficient for the Sphere of Influence amendment and annexations to occur simultaneously.

The sentence the commenter is referring is a description of the “plan area,” stating it includes all land within the Sphere of Influence and includes the proposed annexation of 985-acres east of the city limits. The information the commenter is requesting is provided in Chapter 2, *Project*

Description, Section 2.5, *Plan Objectives*, and Policy LU-2.1: Planned Annexation Area on page 2-16, which states:

“Expand Sphere of Influence and annex the Planned Annexation areas identified on the General Plan Land Use Map to meet housing and jobs development goals.”

Because this clarification is already included in the Draft EIR, no revisions are required in response to this comment.

Response 6.48

The commenter requests that the description of the eastern edge of the city be updated to reference “a service road to the City of Santa Maria water tank complex” instead of “an internal farm road.”

For a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9.

Response 6.49

The commenter states that regional transit including SMOOTH, medical and senior transit throughout the city and that medical transit transfers residents to doctors in Santa Barbara. They state these specific transit providers should be mentioned on page 3-1 of the Draft EIR stating that details are important. They also stated they would like to see specifics regarding the reference to regional rail services, specifically they would like it to be stated that there is a bus stop at the IHOP on Main Street off ramp and that freight transit is provided by a Amtrak and SM Railroad spur from Guadalupe to the city of Santa Maria.

For a discussion of regional transportation services within the city and where they are discussed in the Draft EIR, refer to Response 6.23. This comment is editorial in nature and does not pertain to the adequacy of the Draft EIR or the environmental impact analysis.

Response 6.50

The commenter states that the final paragraph on page 3-1 of the Draft EIR is redundant and should be changed. The commenter recommends deletion of references to “agricultural and vacant use.”

The information in the paragraph referenced by the commenter is mentioned throughout the Draft EIR but is applicable to the Environmental Setting chapter and appropriately discussed on page 3-1. Refer to Response 6.43 for a discussion of the use of the descriptive terms “vacant and agricultural” in the Draft EIR. No land within city limits is designated or zoned specifically for agriculture; agricultural uses operate as transitional uses until development is planned for an area. Refer to Response 5.2 for a discussion of conversion of agricultural lands in the city. No changes to the Draft EIR are required in response to this comment.

Response 6.51

The commenter states that there is a typo on page 3-2 of the Draft EIR.

The Final EIR language on page 3-2 has been revised as follows to correct the typo identified by the commenter:

“This EIR considers the potential impacts from buildout of the General Plan in 2045, compared to ~~existing~~ existing conditions.”

Response 6.52

The commenter states that the discussion under Subsection 4.1.1.a, California Agricultural Resources, in Section 4.1, Agricultural Resources, should be revised to provide details on the County of Santa Barbara and the Santa Maria Valley. The commenter also states that the definition of “Urban and Built-up Land” does not include the definition of urban density of up to 30 units per acre or more. The commenter requests this definition be expanded to include city boundaries and allowed uses.

As described in Subsection 4.1.1.a, *California Agricultural Resources*, the definitions of “Urban and Built-up Land” used in the Draft EIR are derived from the California Department of Conservation. The commenter’s requested revisions are inconsistent with how these terms are defined by the California Department of Conservation. As a result, no changes to the Draft EIR are required in response to this comment.

Response 6.53

The commenter states that the acreage totals in Table 4.1-1, Summary of Important Farmland in the Plan Area and Annexation Area, do not seem right. The commenter also states that previously analyzed planning areas, such as Area 5B7, Area 7, Area 9 and the Airport Specific plan, should not be included in this table.

The Draft EIR provides a program-level analysis of potential impacts to agricultural resources across the 2045 General Plan area, consistent with CEQA Guidelines Section 15168 (Program EIRs). Section 4.1, *Agricultural Resources*, of the Draft EIR includes acreage based on data from the California Department of Conservation. Areas previously evaluated under separate CEQA documents are discussed under Impact AG-1 in Subsection 4.1.3.b, *Project Impacts and Mitigation Measures*, and their prior determinations are incorporated into the analysis. No changes to the Draft EIR are required in response to this comment.

Response 6.54

The commenter states that the Draft EIR should clarify that LAFCo is only responsible for consideration of the annexation areas.

As stated in Section 1.3, *Lead, Responsible, and Trustee Agencies*, Section 2.9, *Required Approvals*, and Subsection 4.1.1, *Setting*, LAFCo’s consideration applies specifically to proposed annexation areas. No changes to the Draft EIR are required in response to this comment.

Response 6.55

The commenter states that Figure 4.1-1 is inaccurate because it does not clearly depict areas that have already been developed or approved, including Area 5B, Area 7, Area 9, the Windset Farms development, and the Airport Specific Plan. The commenter states that the map and associated acreage should exclude land in Orcutt, as this open space is not used for agricultural purposes (i.e., no row crops or grazing). The commenter requests that the figure be revised to reflect previously approved actions by LAFCo and the City.

As discussed in Response 6.53, Figure 4.1-1 was prepared to support the Draft EIR’s program-level analysis of potential impacts to agricultural resources throughout the entire plan area, consistent with CEQA Guidelines Section 15168 (Program EIRs). No changes to the Draft EIR are required in response to this comment.

Response 6.56

The commenter requests the City add Agricultural Preserve contract numbers and expiration dates to Figure 4.1-2 and remove the “Williamson Act Enrollment 2023” note from the legend.

Figure 4.1-2, Williamson Act Lands in the Plan Area, in Subsection 4.1.1.b, *Plan Area Agricultural Resources*, reflects the most current available data from the California Department of Conservation. The “Williamson Act Enrollment 2023” note corresponds to the yellow shaded lots on the map. These shaded lots represent three lots currently under Williamson Act Contracts in the 2045 General Plan area, the “Nonrenewal” status indicates that the three lots do not have pending renewals of their Williamson Act Contracts. The Agricultural Preserve contract numbers and expiration dates for these three lots are included in Subsection 4.1.1.b, *Plan Area Agricultural Resources*. These Williamson Contracts are further discussed under Impact AG-1, in Subsection 4.1.3.b, *Project Impacts and Mitigation Measures*. This analysis also includes the Agricultural Preserve contract numbers and expiration dates for the three lots identified in Figure 4.1-2. No changes to the Draft EIR are required in response to this comment.

Response 6.57

The commenter suggests deleting content relating to “Regional Farmland Trends” from page 4.1-5 of the draft EIR as they believe it is not applicable to the project or the Santa Maria Valley.

The discussion is consistent with CEQA Guidelines Section 15125. C, Contents of Environmental Reports, which describes the knowledge of the regional setting as critical to the assessment of environmental impacts. While the commenter is correct that the information provided within the regional setting discussion on page 4.1-5, under Section 4.1, *Agricultural Resources*, in Subsection 4.1.1.b, *Plan Area Agricultural Resources*, may not directly relate to the plan area, the discussion on the regional setting is important to the overall environmental analysis and appropriately included per CEQA Guidelines Section 15125. No changes to the Draft EIR are required in response to this comment.

Response 6.58

The commenter states that Table 4.1-2 should be formatted to fit on one page. The commenter states that there has not been a loss of agricultural land since the annexations of the City of Santa Maria in 1993 and the 200 acres in the City of Guadalupe in 1995. The commenter states that the discussion under the Regional Farmland Trends heading on page 4.1-5 of the Draft EIR should refer to the history of the planning in the Santa Maria Valley over the last 30 years. The commenter requests that the City revise the whole section.

The comment related to the format of Table 4.1-2 does not pertain to the environmental analysis presented in the Draft EIR. The commenter’s knowledge of the loss of agricultural land in the City of Santa Maria and the City of Guadalupe is acknowledged. As discussed in Response 6.57, the regional setting discussion in Subsection 4.1.1.b, *Plan Area Agricultural Resources*, does not cover the changes in planning within the city over the last 30 years because the discussion focuses on regional

setting information. Specific plan area setting information can be found in Subsection 4.1.1, *Setting*. No changes to the Draft EIR are required in response to this comment.

Response 6.59

The commenter requests that the City add a note to the discussion under the City of Santa Maria Uniform Rules for Agricultural Preserves discussion on page 4.1-8 that there are no agricultural preserves in the city of Santa Maria.

The discussion that the commenter is referring to can be found in Subsection 4.1.2.c, *Local Regulations*. The purpose of this discussion is to describe the local regulations that are applicable to the project, including the City of Santa Maria Uniform Rules for Agricultural Preserves. The information the commenter is requesting is provided on Figure 4.1-2, Williamson Act Lands in the Plan Area, as well as in Subsection 4.1.1.b, *Plan Area Agricultural Resources*, and under Impact AG-1, in Section 4.1, *Agricultural Resources*. As the Draft EIR acknowledges that there are no agricultural preserves within the city of Santa Maria, no changes to the Draft EIR are required in response to this comment.

Response 6.60

The commenter states that there are not 5,116 acres of ag land in the plan area and that the analysis within Impact AG-1 should be based on the annexation area exclusively. The commenter asks where there are nine acres of grazing land, and if that grazing land is located in the annexation area.

The acreage of grazing land in the city is shown in Table 4.1-1, Summary of Important Farmland in the Plan Area and Annexation Area, and Figure 4.1-1, Important Farmland in the Plan Area, in Section 4.1, *Agricultural Resources*. The approximately nine acres of the annexation area are listed as Farmland of Local Importance. The data shown in these locations are based on data from the California Department of Conservation's Farmland Mapping & Monitoring Program. As discussed in Response 6.18, this Draft EIR includes environmental analysis of the whole plan area, consistent with CEQA Guidelines Section 15168 (Program EIRs). As shown in Figure 4.1-1, Important Farmland in the Plan Area and Annexation Area, Grazing Land is represented by a light tan color, which appears in the southern portion of the city as well as the southern portion of the Sphere of Influence. No changes to the Draft EIR are required in response to this comment.

Response 6.61

The commenter states that the analysis under Impact AG-1 should mention that agricultural land within the City of Santa Maria had been previously approved under other EIRs for urban development with Statements of Overriding Consideration. They also state that the second and third paragraphs under Impact AG-1 should be combined into one paragraph.

The analysis under Impact AG-1 in Section 4.1, *Agricultural Resources*, acknowledges that areas identified as important farmland within the city were previously evaluated and approved for conversion of agricultural resources to non-agricultural uses under prior EIRs. The impact analysis also references the Statement of Overriding Considerations adopted by the City Council on September 15, 1994, for the EIR prepared for the City's Sphere of Influence Expansion (SCH#90010930), which documented the conversion of agricultural resources to non-agricultural uses.

For a discussion of comments, recommendations, and requests that do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis, refer to Response 6.9. No changes to the Draft EIR are required in response to this comment.

Response 6.62

The commenter states that the reference to the Greenbelt and Urban buffer within the impact analysis for Impact AG-1 is important because it has been the guiding planning tool for the city over the last 30 years. They also state this buffer will be adjusted in the new Sphere of Influence and annexation area.

The comment does not request a change to the Draft EIR. The City's Greenbelt and Urban Buffer ordinance is discussed under Impact AG-1 in Section 4.1, *Agricultural Resources*. As discussed in the impact discussion, potential impacts to agricultural resources within the areas immediately adjacent to the Area 9 Specific Plan area were determined to be less than significant as impacts would be offset by the establishment of the Greenbelt and Urban Buffer. The project does not include specific amendments to the City's Greenbelt and Urban Buffer. No changes to the Draft EIR are required in response to this comment.

Response 6.63

The commenter requests changes to the 2045 General Plan Goal COS-2, Action COS 2.1.2 and Policy LU-1.2.

For a discussion of recommended changes to the General Plan Update policy framework, refer to Response 6.16. This comment is regarding policy language included within the 2045 General Plan Update that does not pertain to the analysis presented within the Draft EIR. Comments related to the 2045 General Plan Update are noted and will be passed on to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response to this comment.

Response 6.64

The commenter states that Figure 4.1-3 does not have a relationship with the proposed annexation and should be deleted. The commenter also states that the map shows incorrect land use designations and should include each of the Area numbers. The commenter ask specifically about the inclusion of Area 7 and the SMAP. They suggest either showing all the planning areas in the city or deleting the map.

In response to this comment, Figure 4.1-3, Previously Evaluated Land Use Changes, within Section 4.1, *Agricultural Resources*, has been deleted from the Final EIR.

In addition, the following revisions have been made to the discussion of Impact AG-1:

The California Department of Conservation currently lists several sites within the city as either Grazing Land, Prime Farmland, or Unique Farmland. However, these sites, shown as important farmland in Figure 4.1-3, have previously undergone environmental review for the conversion of agricultural land.

Response 6.65

The commenter requests revisions to General Plan Update policies, including changes to Policies LU-9.2, LU-9.3, and LU-9.4, as well as deletion of Policy LU-9.2.

For a discussion of recommended changes to the General Plan Update policy framework, refer to Response 6.16. Changes to Policy LU-9.3 in the 2045 General Plan Update have been carried over into the Final EIR, as appropriate. This comment is regarding policy language included within the 2045 General Plan Update that does not pertain to the analysis presented within the Draft EIR. Comments related to the 2045 General Plan Update are noted and will be passed on to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response to this comment.

Response 6.66

The commenter requests specific edits to the “Significance After Mitigation” discussion on page 4.1-13 of the Draft EIR. They request that the discussion state that the proposed Sphere of Influence expansion and annexation would convert agricultural land to urban uses. They also request deletion of the first sentence of the paragraph and inclusion of language stating that the City will plan land uses to incorporate a “Greenbelt and Urban Buffer” to respect surrounding agricultural lands outside the city.

The conversion of agricultural land to urban uses is discussed in Section 4.1, *Agricultural Resources*, Subsection 4.1.3.b, *Project Impacts and Mitigation Measures*. As discussed therein, implementation of the 2045 General Plan Update would allow for future conversion of Important Farmland and conflicts with agricultural zoning in the annexation area. The Draft EIR concludes this impact would be significant and unavoidable. Policies included in the 2045 General Plan Update would reduce potential adverse impacts related to the conversion of Important Farmland and Williamson Act contract lands in the annexation area to the extent feasible through preservation efforts and by requiring conservation easements. Refer to Response 6.62 for a discussion of comments related to “Greenbelt and Urban Buffer”. No changes to the Draft EIR are required in response to this comment.

Response 6.67

The commenter requests the first sentence of paragraph three on page 4.1-14 of the Draft EIR be changed from:

“Since the mid-20th century, the Santa Maria region has experienced steady urban expansion resulting in Important Farmland being incrementally converted to residential, commercial, and industrial uses (DOC 2015).”

to:

“The Santa Maria valley has over 180,000 (?) acres of prime land and an additional 100,000 (?) acres of non-prime and grazing lands. 30 years ago, the city of Santa Maria and Guadalupe annexed lands and there has been no annexations since. The city of Santa Maria annexed 2,000 acres and Guadalupe annexed 200 acres to provide land for the growth of these two cities. This is less than 1 % of the ag land in the valley.”

The commenter states it is important to emphasize the efforts by the City, County, and LAFCo over the past 30 years to plan growth while protecting agriculture and asserts that now is the time to allow another small annexation for future growth. The commenter also states that most of the current paragraph is incorrect and needs revision.

The language presented in Subsection 4.1.a, *Cumulative Impacts*, in Section 4.1, *Agricultural Resources*, describes the potential cumulative impacts to agricultural resources due to implementation of the 2045 General Plan Update. The Draft EIR is intended to evaluate potential environmental impacts and does not advocate for or against approval of the 2045 General Plan Update. The commenter's recommended revision would introduce language intended to justify annexation and emphasize policy efforts, which is outside of the scope of the Draft EIR. The commenter does not identify specific factual inaccuracies or provide evidence requiring correction. Therefore, no changes are required in response to this comment.

Response 6.68

The commenter states that the first 14 pages of Section 4.2, Air Quality and Greenhouse Gas Emissions, are routine information in every EIR. The commenter recommends that Table 4.2-4, Ambient Air Quality Data, be shifted to the following page so the table is on one page opposed to being split between two pages.

The commenter is correct that the first 14 pages of Section 4.2, *Air Quality and Greenhouse Gas*, provide readers with context of the surrounding area, applicable regulatory setting, and an explanation for how air quality is quantified and evaluated. Refer to Response 6.9 for a discussion of editorial edits, such as reformatting Table 4.2-4, *Ambient Air Quality Data*.

Response 6.69

The commenter questions the accuracy of the first sentence regarding the Earth's surface temperature and suggests including global population growth over the last 200 years.

The commenter is referring to the first sentence in the second paragraph of Subsection 4.2.1.a, *Air Quality Setting*. The statement that the Earth's surface would be approximately 33 degrees Celsius cooler without greenhouse gases is supported by the World Meteorological Organization (2013), as cited in the Draft EIR. Global population trends are not relevant to this project and need not be discussed in this Draft EIR. No changes to the Draft EIR are required in response to this comment.

Response 6.70

The commenter states that the discussion under the heading "California GHG Emissions Inventory" on page 4.2-9 in Section 4.2, Air Quality and Greenhouse Gas, subsection 4.2.1.a, Air Quality Setting, should include a table provided by the California Air Resources Board (CARB) illustrating GHG levels beginning in 1990, which exceeded 500 million metric tons (MMT). The commenter notes that the State's goal is to reduce GHG emissions by 40 percent by 2030 and that the requested table would illustrate the extent of reductions achieved to date. The commenter states these reductions have resulted from measures such as vehicle modifications, decreased oil production activities, and building code requirements. The commenter requests that this information be added to the paragraph under the "California GHG Emissions Inventory" heading.

Pursuant to Table 2, Greenhouse Gas Emissions by Sector in 1990, of the Staff Report for the California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, the total GHG emissions

in 1990 were 433 MMT CO₂e. This value does not exceed 500 MMT as suggested by the commenter. The information provided by the commenter has no bearing on the analysis or conclusions of the Draft EIR, and therefore no changes are required in response to this comment.

Response 6.71

The commenter requests that all references to “1990 GHG levels” under the “California Global Warming Solutions Act of 2006 (Assembly Bill 32, and Senate Bill 32, and Assembly Bill 1279)” heading on page 4.2-14 in Section 4.2, Air Quality and Greenhouse Gas, Subsection 4.2.2.b, State Regulations, include the specific value of over 500 MMT to illustrate the State’s progress toward reduction goals.

Refer to Response 6.70 for a discussion of 1990 GHG emission levels.

Response 6.72

The commenter requests inclusion of 2013 baseline levels and current levels for each Senate Bill 1383 target, and states that the City has adopted organic waste collection in compliance with the law.

The level of detail provided on state regulations in Subsection 4.2.2.b, *State Regulations*, describes applicable state regulations for a programmatic analysis of the 2045 General Plan Update. Additional details regarding organic waste collection goals are provided in Section 4.8, *Utilities and Service Systems*. No changes to the Draft EIR are required in response to this comment.

Response 6.73

The commenter suggests referencing the upcoming 2026 Building Code and its anticipated energy efficiency requirements.

The discussion under the “California Building Standards Code” heading in Subsection 4.2.2.b, *State Regulations*, explains the purpose and evolution of Title 24 standards, including the CALGreen Code and the recently adopted 2022 Energy Code. These standards are periodically updated to incorporate new technologies and methods that improve energy efficiency and reduce greenhouse gas emissions. Future updates, such as the 2026 Building Code, will be implemented through the City’s building permit process and are expected to further reduce GHG emissions. Future development facilitated by the 2045 General Plan Update would be required to comply with the most current California Building Code. No changes to the Draft EIR are required in response to this comment.

Response 6.74

The commenter states that the discussion under the “City of Santa Maria” heading at the bottom of page 4.2-17, in Section 4.2, Air Quality and Greenhouse Gas, Subsection 4.2.2.a, Local Regulations, implies all future projects in the City of Santa Maria will require greenhouse gas and air quality analyses, which they believe would be costly. The commenter questions why the City did not include GHG thresholds in the General Plan Update and asserts that infill projects should be considered GHG-reducing and exempt from further studies. The commenter also notes that most housing projects will be exempt from CEQA under state law and requests that this clarification be added to the paragraph.

Refer to Response 6.8 for a discussion of individual projects requiring environmental review.

Response 6.75

The commenter questions the assumptions used in Table 4.2-5, CalEEMod Land Use Assumptions, and states the land use inputs do not reflect realistic development patterns.

Table 4.2-5, CalEEMod Land Use Assumptions, included in Subsection 4.2.3, *Impact Analysis*, summarizes CalEEMod inputs based on net changes in land use under the 2045 General Plan Update. The assumptions that inform these inputs are based on the buildout information included in Subsection 2.6.5, *Proposed 2045 General Plan Buildout*, and are intended to support a conservative program-level emissions estimate, not to predict specific development outcomes. Additional details regarding the land use assumptions reflected in Table 4.2-5 are provided in Subsection 2.6.5, *Proposed 2045 General Plan Buildout*, of Chapter 2, *Project Description*. Table 4.2-5 in Section 4.2, *Air Quality and Greenhouse Gas Emissions*, has been revised to correct the transposition of 1,021 to 1,012, consistent with Subsection 2.6.5, *Proposed 2045 General Plan Buildout*:

Land Use Categories	New Uses	Reduction in Uses
Residential	+16,140 units	–
Mixed-Use (assumed to be office uses in CalEEMod)	+452 ac	–
Industrial	+7 ac	–
Recreational Parks	+33 ac	–
Planned Future Development (assumed to be office uses in CalEEMod)	+1,021 1,012 ac	–
Commercial	–	-463 ac

N/A = not applicable; ac = acres

Response 6.76

The commenter states that the assumptions used in CalEEMod are outdated because the building code has been updated multiple times since 2019 and will be updated again in 2026. They note that these updates continue to improve energy efficiency in building and housing construction.

The commenter is correct that the CalEEMod assumptions incorporate the 2019 Building Energy Efficiency Standards (Title 24). CalEEMod is an emissions estimation model developed and periodically updated by the California Air Pollution Control Officers Association. The most recent iteration of the model (Version 2022.1.0.14) used for the purposes of this analysis utilizes the 2019 California Building Code (CBC). It is not known when CalEEMod will be updated to incorporate the 2025 CBC. As stated in Subsection 4.2.3, *Impact Analysis*, the CalEEMod outputs represent a conservative assumption as the estimates do not account for additional energy efficiency improvements required by the 2022 Title 24 update or anticipated future updates, such as the 2025 standards. Using a conservative assumption is appropriate for a program EIR because there is insufficient detail to conduct project-level analysis, and attempting to do so would be inappropriately speculative. No changes to the Draft EIR are required in response to this comment.

Response 6.77

The commenter states that the VMT assumptions in Table 4.2-6 are incorrect and recommends referencing SBCAG’s January 2025 zero emission vehicle report. The commenter also asserts that VMT assumptions should reflect future conditions rather than past data.

The VMT assumptions in Table 4.2-6, Plan 2045 VMT, in Subsection 4.2.3, *Impact Analysis*, are based on the Santa Maria Travel Demand Model prepared by GHD in June 2025 to support the Draft EIR. Annual VMT was estimated by multiplying daily VMT per household and per employee by projected increases in residential units and employment and then applying it to 365 days per year. This approach represents a conservative assumption because it applies daily VMT rates uniformly across all days of the year without accounting for reduced travel on weekends or holidays. Consistent with CEQA Guidelines Section 15168, a conservative approach is appropriate for a program EIR because there is insufficient detail to conduct project-level analysis, and attempting to do so would be inappropriately speculative.

SBCAG did not produce a Zero-Emission Vehicle (ZEV) Report in 2025; however, the California Energy Commission released a Zero-Emission Resilient Transportation Blueprint report which was prepared by CALSTART. While the California Energy Commission's Santa Barbara Zero-Emission Resilient Transportation Blueprint may provide useful context on future electrification and resiliency strategies, its inclusion in this EIR would not alter the methodology or assumptions used in this analysis. Incorporating it as a reference would not change the conclusions of the Draft EIR as the analysis must rely on existing, verifiable data rather than speculative projections about future technology adoption or behavioral changes. No changes to the Draft EIR are required in response to this comment.

Response 6.78

The commenter states that the City has not completed a review to establish GHG thresholds and questions why this has not been completed. They also ask if every project in the future is going to have to complete a GHG analysis. The commenter states that most housing projects are now exempt from CEQA and will continue to be exempt in the future, and requests that this information be included in the paragraph.

This comment regarding the City's GHG threshold review does not pertain to the Draft EIR's environmental analysis. Citywide GHG thresholds, though not included as part of the 2045 General Plan Update, are proposed to be established by Action COS-1.1.1 in Conservation and Open Space Element of the 2045 General Plan Update. Refer to Response 6.8 for a discussion regarding future individual projects requiring environmental review. No changes to the Draft EIR are required in response to this comment.

Response 6.79

The commenter requests changes to the 2045 General Plan Action COS-5.1.3 and also requests that any updates to the Conservation and Open Space Element are also made in the EIR for consistency.

In response to this comment, Action COS-5.1.3 was revised in the 2045 General Plan Update to remove mention of the Santa Barbara County Congestion Management Program and revisions have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

Response 6.80

The commenter states that Table 4.2-5 and Table 4.2-6 need to be recalculated because many of the buildout assumptions are incorrect. They assert that by 2045-2050, air quality impacts will be substantially reduced and that the Table 4.2-7 should average impacts over the next 20–25 years as

development occurs. The commenter also notes that the table does not indicate it assumes full buildout impacts in 2045 and requests that the table be corrected based on a new CalEEMod run.

Refer to Response 6.75 for a discussion regarding Table 4.2-5, CalEEMod Land Use Assumptions, in Subsection 4.2.3, *Impact Analysis*. Refer to Response 6.77 for a discussion regarding Table 4.2-6, Plan 2045 VMT. Table 4.2-7, Estimated Operational Emissions, was prepared using the same methodology and assumptions as the other two tables to ensure consistency throughout the Draft EIR. The analysis appropriately assumes full buildout conditions for 2045, consistent with CEQA Guidelines Section 15168, which governs program-level EIRs. Furthermore, CEQA Guidelines Section 15125(a)(3) requires an existing conditions baseline to not include hypothetical conditions. Accordingly, emissions are representative of the full buildout of the 2045 General Plan Update compared to existing buildout. No changes to the Draft EIR are required in response to this comment.

Response 6.81

The commenter states that the first sentence under the operations discussion for Impact AQGHG-2 on page 4.2-25 should be deleted. They state that the Draft EIR already concludes there will be a significant impact and a statement of overriding considerations has been adopted, therefore requiring future projects to conduct air quality and GHG studies would be unnecessary and costly. The commenter again states that many housing projects will be exempt from CEQA and requests that this be clarified. The commenter further asserts that, without adopted thresholds, requiring such studies is inefficient and recommends deleting mitigation measure AQGHG-2, stating that standard air quality and GHG measures are already addressed through building codes.

As analyzed Subsection 4.2.3, *Impact Analysis*, operational impacts from implementation of the 2045 General Plan Update would generate long term regional air pollutant emissions and concludes that operational air quality and greenhouse gas impacts would be significant and unavoidable. Refer to Responses 6.85 and 6.86 for a discussion regarding modeling assumptions and lack of project-specific details. As such, the Draft EIR concluded operational impacts would be significant and unavoidable as future individual projects may still exceed SBCAPCD thresholds. It is important to note that a statement of overriding considerations has not yet been adopted for this Draft EIR and if a statement of overriding considerations were to be adopted, it would be done so by the City Council.

Mitigation Measure AQGHG-2 is included to reduce the severity of operational impacts to the extent feasible, consistent with CEQA Guidelines Section 15126.4(a)(1), which requires lead agencies to adopt feasible mitigation measures that minimize significant environmental effects, even if those effects cannot be completely avoided. In response to this comment, Mitigation Measure AQGHG-2 has been revised as follows:

AQGHG-2 Project-Level Air Quality Analysis and Mitigation

The City shall require, where it is determined as necessary, applicants for future discretionary development projects facilitated by the 2045 General Plan Update to prepare a project-specific air quality analysis in accordance with SBCAPCD Environmental Review Guidelines. The analysis shall quantify construction and operational emissions and compare estimated emissions to the SBCAPCD's adopted thresholds of significance for criteria air pollutants. If the analysis determines that emissions would exceed any of the applicable thresholds, the project applicant

shall implement all feasible mitigation measures to reduce emissions to below the thresholds. All mitigation measures shall be documented and verified by the lead agency prior to project approval or issuance of grading/building permits.

Refer to Response 6.8 for a discussion of future environmental review for individual projects. No changes to the Draft EIR are required in response to this comment.

Response 6.82

The commenter suggests deleting or revising the “Significance After Mitigation” discussion following Mitigation Measure AQGHG-2. They state additional air quality and GHG studies based on this Programmatic EIR analysis that has already run CalEEMod on the proposed full build out should not be required.

The Significance After Mitigation discussion in Subsection 4.2.3, *Impact Analysis*, summarizes potential air quality and GHG impacts of the 2045 General Plan after mitigation. Refer to Response 6.8 for a discussion of potential future environmental review for individual projects. Refer to Response 6.81 for a discussion of the applicability of Mitigation Measure AQGHG-2. No changes to the Draft EIR are required in response to this comment.

Response 6.83

The commenter requests revising the discussion of construction-related activities under Impact AQGHG-3 to include that state law will soon require most construction equipment to be electric or hybrid, and that most diesel equipment will be retired.

Refer to Response 4.3 for a discussion of changes related to construction equipment in Mitigation Measure AQGHG-3. The analysis under Impact AQGHG-3 in Subsection 4.2.3, *Impact Analysis*, estimates potential construction-related emissions and associated health risks based on current conditions and regulatory requirements. Although the commenter is correct that state law may change in the future, the analysis in this EIR uses a conservative assumption based on existing environmental and regulatory conditions. This approach is standard for a program-level EIR because specific details of future projects are unknown, and predicting future equipment types or regulatory changes would be inappropriate speculative. No changes to the Draft EIR are required in response to this comment.

Response 6.84

The commenter suggests Mitigation Measure AQGHG-3 be reviewed by local contractors to receive their opinion on its relevance, and to delete the mitigation measure if it is no longer relevant.

Mitigation Measure AQGHG-3, *Construction Equipment Exhaust Control Measures*, in Subsection 4.2.3, *Impact Analysis*, remains relevant because it provides a feasible mechanism to reduce diesel particulate matter emissions from heavy-duty off-road equipment during construction near sensitive receptors. While future state regulations may reduce the use of diesel equipment, the timing and availability of compliant equipment cannot be guaranteed for all projects over the planning horizon. This measure ensures that, where commercially available, Tier 3 or higher engines or CARB-certified Level 3 diesel particulate filters are used.

The Draft EIR was available for public review from August 14, 2025, through September 28, 2025, and the City did not receive any comments from local contractors regarding the relevance or

feasibility of Mitigation Measure AQGHG-3. No changes to the Draft EIR are required in response to this comment.

Response 6.85

The commenter states that the City should have created thresholds of significance for greenhouse gas emissions concurrently with the General Plan update process.

The comment regarding the City's GHG Thresholds does not pertain to the Draft EIR's environmental analysis. Refer to Response 6.78 for a discussion of establishment of GHG thresholds for the city. The commenter's opinion will be passed on to decision makers for their consideration. No changes to the Draft EIR are required in response to this comment.

Response 6.86

The commenter asks clarification on the baseline of 1990 GHG levels.

Refer to Response 6.70, for a discussion of total GHG emissions in 1990. No changes to the Draft EIR are required in response to this comment.

Response 6.87

The commenter suggests revision of Goal COS-6, encourages the City to be carbon neutral per state law, and suggests GHG levels will be exceeded by full buildout of the General Plan.

In response to this comment, Goal COS-6 has been revised in the 2045 General Plan Update to indicate the City strives to be carbon neutral and revisions have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

The commenter's recommendation to achieve carbon neutrality by 2045–2050 has been acknowledged, as well as their assertion that GHG levels will be exceeded with full buildout of the General Plan. No changes to the Draft EIR are required in response to this comment.

Response 6.88

The commenter states the City is served by PG&E and not Southern California Edison.

In response to the commenter's statement, the following corrections have been made in Subsection 4.2.3, *Impact Analysis*, of the EIR:

Future development would also be served by ~~Southern California Edison~~ Pacific Gas and Electric or Central Coast Community Energy, both of which are required to increase its renewable energy procurement in accordance with SB 100 targets.

Response 6.89

The commenter requests that the instance of Goal COS 6 in Impact AQGHG-5 of Section 4.2, Air Quality and Greenhouse Gas, and subsequent instances are removed as it is previously listed.

Refer to Response 6.9 for a discussion of editorial changes which do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis. No changes to the Draft EIR are required in response to this comment.

Response 6.90

The commenter suggests the plan consistency discussion on in Subsection 4.2.3, Impact Analysis, of Section 4.2, Air Quality and Greenhouse Gas be revised for clarity and to change the discussion of VMT inconsistency to consistent.

This discussion distinguishes between consistency with relevant regional plans such as SBCAG's 2050 RTP/SCS and the California Air Resources Board's (CARB's) 2022 Scoping Plan, and applicable goals and policies and inconsistency with specific performance targets. CEQA Guidelines Section 15125(d) requires disclosure of both areas of consistency and areas where conflicts remain. The analysis discloses which applicable goals and policies the 2045 General Plan Update would be consistent with and which applicable goals and policies the 2045 General Plan Update may conflict with.

As discussed under Impact TRA-2 of Section 4.7, *Transportation and Traffic*, Subsection 4.7.3, *Impact Analysis*, 2045 citywide VMT rates with implementation of the 2045 General Plan Update would not meet the 17 percent VMT reduction target required for consistency with CEQA Guidelines Section 15064.3(b). Though there may be measures to reduce VMT in the future, there are no feasible General Plan policies or mitigation measures that could reduce citywide VMT rates below this target and the applicability of future VMT reduction measures would be speculative. Therefore, this impact would remain significant and unavoidable. No changes to the Draft EIR are required in response to this comment.

Response 6.91

The commenter suggests the first row of Table 4.2-8 be revised to clarify the number of planned residential units in infill locations and annexation areas.

The consistency statement provided in Table 4.2-8, Plan Consistency with the SBCAG 2050 RTP/SCS, in Subsection 4.2.3, *Impact Analysis*, describes the relationship between the 2045 General Plan Update and Policy 1.1: Land Use of the SBCAG 2050 RTP/SCS. The statement identifies that the plan would facilitate development of 16,140 net new residential units in infill and urbanized areas near services and transit, along with generating 23,750 net new jobs to improve the jobs-housing balance. The additional details requested by the commenter would not affect the determination that the 2045 General Plan Update is consistent with Policy 1.1: Land Use of the SBCAG 2050 RTP/SCS. No changes to the Draft EIR are required in response to this comment.

Response 6.92

The commenter suggests the second row of Table 4.2-8 is revised to make the discussion conclude consistent based on state law. The commenter suggests correcting that PG&E works with 3CE.

The consistency statement provided in Table 4.2-8, Plan Consistency with the SBCAG 2050 RTP/SCS, in Subsection 4.2.3, *Impact Analysis*, identifies consistency with some components of Policy 1.2, such as compliance with Title 24 and SBCAPCD rules, and inconsistency with others, specifically the potential inability to achieve State goals for carbon neutrality by 2045 as outlined in CARB's 2022 Scoping Plan and AB 1279. CEQA Guidelines Section 15125(d) requires disclosure of inconsistencies with applicable regional plans, and this analysis fulfills that CEQA Guidelines requirement.

Refer to Response 6.88, for a discussion regarding applicable utility providers in Santa Maria. The following edit has been made to Subsection 4.2.3, *Impact Analysis*, of the EIR:

Inconsistent: Future development facilitated by the plan would be required to comply with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and would also be served by ~~Southern California Edison~~ Pacific Gas and Electric or Central Coast Community Energy, both of which are required to increase its renewable energy procurement in accordance with SB 100 targets.

Response 6.93

The commenter suggests removing the last two sentences of the first paragraph of Page 4.2-33 and suggests the City cannot be held to a 2022 Ozone Plan in 2045.

The sentences referenced by the commenter in Subsection 4.2.3, *Impact Analysis*, support the EIR's obligation to disclose potential inconsistencies with currently adopted State and regional plans, including CARB's 2022 Scoping Plan and SBCAG 2050 RTP/SCS. This disclosure is required under CEQA Guidelines Section 15125(d), which states that an EIR must discuss any inconsistencies between the proposed project and applicable regional plans. The discussion reflects the State's adopted goal of achieving carbon neutrality by 2045 (AB 1279 and Executive Order B-55-18) and evaluates the plan against those requirements based on information available at the time of EIR preparation. The analysis does not speculate about future amendments and provides transparency regarding current standards. No changes to the Draft EIR are required in response to this comment.

Response 6.94

The commenter suggests that Table 4.2-9 be revised to fit onto one page, opposed to being split between two, and to clarify development will happen throughout the 2045 General Plan Update implementation and will include many air quality measures. The commenter suggests the energy discussion should reflect that the City is part of 3CE. The commenter suggests development will be net zero GHG emissions by 2045.

Refer to Response 6.9 for a discussion of editorial changes which do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

Table 4.2-9 in Subsection 4.2.3, *Impact Analysis*, presents a conservative estimate of operational GHG emissions based on full buildout conditions and current regulatory requirements. This approach is appropriate for a program-level EIR as specific project details and the timing of future regulatory changes cannot be predicted without speculation. While future development under the 2045 General Plan Update would occur over a 20-year horizon, and would be expected to implement additional air quality and GHG reduction measures, including compliance with SB 100 renewable energy targets and vehicle electrification goals, it would be inappropriately speculative to quantify these measures at this stage of review. Therefore, the table reflects a conservative assumption to ensure disclosure of potential impacts consistent with CEQA Guidelines Section 15144 and Section 15125(d). No changes to the Draft EIR are required in response to this comment.

Response 6.95

The commenter suggests the first two paragraphs on Page 4.2-34 are incorrect as new development will emit net zero GHG emissions by 2045-2050 based on state law.

Refer to Response 6.94 for a discussion of conservative assumption analysis based on current regulatory requirements. No changes to the Draft EIR are required in response to this comment.

Response 6.96

The commenter suggests the cumulative discussion on Pages 4.2-34 through 4.2-36 be revised to address state requirements to be net zero by GHG. The commenter states it is not appropriate to hold future development to the standards of existing plans. The commenter suggests infill and annexation development will address the requirement to reduce air quality and GHG emissions through the 2045 General Plan Update horizon.

Refer to Responses 6.93 and 6.94 for discussions regarding the comparison of the proposed project's emissions based on existing regulatory requirements and the appropriateness of comparing the proposed project to existing applicable emissions targets. No changes to the Draft EIR are required in response to this comment.

Response 6.97

The commenter suggests revising paragraph two on Page 4.3-1 to reference prior biological surveys conducted by Rincon and other consultants in the Santa Maria Valley. The commenter states that these reports show very few biological resources in the area due to historic agricultural use.

The paragraph referenced by the commenter, in Subsection 4.3.1, *Setting*, describes the most up-to-date and publicly available information sources used to prepare the environmental setting for Section 4.3, *Biological Resources*. These sources include federal and State databases such as United States Fish and Wildlife Service Information for Planning and Consultation tool, California Department of Fish and Wildlife California Natural Diversity Database, and National Oceanic and Atmospheric Administration Protected Resources, as well as regional datasets and the City's Existing Conditions Report. This approach is appropriate for a program-level EIR because it provides comprehensive coverage of sensitive biological resources across the entire plan area. While Rincon has conducted biological surveys in the plan area related to other projects, these surveys were conducted for specific projects and are not relevant to the General Plan Update considered in this EIR. Future development facilitated by the 2045 General Plan Update would be required to conduct site-specific surveys, as necessary, to assess site-specific biological resources at individual project sites. No changes to the Draft EIR are required in response to this comment.

Response 6.98

The commenter suggests the use of the phrase "open space" in the third paragraph on page 4.3-1 is not correct and state the land is agricultural land. They assert that the EIR should clarify that areas such as 5B, 7, 9, and the Santa Maria Public Airport are designated for future residential, commercial, and industrial uses. They also request revising the percentage to show that over 85 percent of this land is designated for urban uses and that the current 29 percent agricultural/open space designation is an interim condition before full development occurs.

The land use designations described in the third paragraph in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, are sourced from the General Plan Land Use Classifications table in the City's Land Use and Community Design Existing Conditions Report (https://www.imaginesantamaria.com/files/ugd/e3bef4_f63eb5691b0d4fd8bb3a312f68badc5b.pdf). These designations reflect the most current and up-to-date land use classifications for the plan area and were used to describe existing setting for the biological resources analysis. No changes to the Draft EIR are required in response to this comment.

Response 6.99

The commenter states that there is very little area with undistributed native habitat and Figure 4.3-1 shows most of this land located south of Orcutt.

As described in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, the plan area contains substantial urban and suburban development. However, there are some areas of relatively undisturbed natural habitats. Figure 4.3-1, *Vegetation Communities in the Plan Area*, corroborates this statement, showing the majority of the plan area containing “Developed-Ruderal-Landscaped” area with only a few occurrences of various natural habitats such as Western Oak Woodland and Savanna and Chaparral in the southern portion of the plan area. No changes to the Draft EIR are required in response to this comment.

Response 6.100

The commenter states that Figure 4.3-1 is incorrect and should be revised to reflect the existing biological conditions of various areas throughout Santa Maria. Specifically, the commenter requests changes to the display of the Santa Maria Cemetery, Santa Maria Landfill, Rivergate Specific Plan Area, Guggia and DeBarnardi property, Santa Maria Airport, Area 9, Area 7, and Area 5B.

In response to this comment, Figure 4.3-1, *Vegetation Communities in the Plan Area*, located in Subsection 4.3.1.a, *Land Cover and Vegetation Communities* has been revised in the Final EIR to remove sites that are now under construction or have already been developed and have little to no vegetation on the site.

Response 6.101

The commenter suggests that the last two sentences of paragraph one and paragraph three on page 4.3-3 be removed. The commenter states the California Department of Fish and Wildlife (CDFW) description is not an accurate reflection of the Santa Maria Valley. The commenter further states that agricultural operations occur in the plan area.

The language the commenter is referring to in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, provides a broad description of regional conditions from CDFW. This level of detail is appropriate for the Draft EIR as it is a programmatic EIR prepared pursuant to CEQA Guidelines Section 15168. Programmatic EIRs are intended to evaluate impacts on a plan-wide scale rather than provide site-specific detail. A generalized description provides consistency across the analysis and avoids unnecessary speculation about localized variations.

The environmental setting of agricultural operations in the plan area is described in the “Agricultural – Field and Row Crops” portion of the setting discussion, which explains the predominance of cultivated lands and why biological resources are generally limited in these areas. Agricultural lands typically lack native vegetation and provide minimal habitat value due to ongoing disturbance and crop management practices. This context supports the conclusion that the existing language is sufficient for describing biological conditions at the program level. No changes to the Draft EIR are required in response to this comment.

Response 6.102

The commenter suggests removing the fourth paragraph on page 4.3-3, stating barren land does not exist in the Santa Maria Valley.

The paragraph in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, referred to by the commenter, provides a general description of what “barren land” describes. Barren land exists in the plan area as not all agricultural land is viable. Barren lands are discussed in Subsection 4.3.1a, *Barren Lands*, and are defined as habitat that is characterized by an absence of vegetation and includes any habitat with less than two percent total vegetation cover by herbaceous, desert, or non-wildland species and less than 10 percent cover by shrub or tree species. Barren lands include urban areas categorized as developed, ruderal, and landscaped and in agricultural areas, includes disked or plowed agricultural fields. No changes to the Draft EIR are required in response to this comment.

Response 6.103

The commenter suggests removing paragraph five on page 4.3-3 and asserts the information is not applicable to Santa Maria.

The commenter is referring to the discussion of evergreen orchards in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*. Evergreen orchards exist in the Santa Maria River Valley in the plan area. Evergreen orchards as defined in the Draft EIR and by CDFW are orchards typically dominated by a single species of tree, such as almonds, apples, apricots, peaches, pecans, and walnuts for deciduous orchards and avocados, grapefruit, lemons, limes, olives, oranges, and tangerines for evergreen orchards. Agricultural – Orchard is identified on Figure 4.3-1, *Vegetation Communities in the Plan Area*, and is shown to occur in various parts of the city. No changes to the Draft EIR are required in response to this comment.

Response 6.104

The commenter asks to clarify paragraph two on page 4.3-4 the location of Pine/Cypress habitat.

The California Mixed Evergreen Forest and Woodland habitats in the plan area are identified as Agricultural – Vineyard and Bush Fruit on Figure 4.3-1, *Vegetation Communities in the Plan Area*, located in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, and is shown to occur in the western and southwestern portions of the city. No changes to the Draft EIR are required in response to this comment.

Response 6.105

The commenter suggests removing paragraphs four and five on page 4.3-4 and asserts the information is not applicable to Santa Maria.

The Chaparral habitat in the plan area are identified as Agricultural – Vineyard and Bush Fruit on Figure 4.3-1, *Vegetation Communities in the Plan Area*, located in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, and is shown to occur in the southern portion of the city. No changes to the Draft EIR are required in response to this comment.

Response 6.106

The commenter suggests removing the word ruderal from paragraph two of page 4.3-5.

“Ruderal” describes areas where plants grow on ground disturbed by human activity. This term is defined in in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*. Ruderal areas occur in the

plan area and are therefore relevant to the Draft EIR. No changes to the Draft EIR are required in response to this comment.

Response 6.107

The commenter suggests removing paragraph three of page 4.3-5 and asserts the information is not applicable to Santa Maria.

Refer to Response 6.102 for a discussion of barren lands and their presence in the city.

Response 6.108

The commenter suggests minor language changes to paragraph four of page 4.3-5 and states that vernal pools need to be described in this paragraph.

Vernal pools are defined as a type of temporary wetland that support plants and animals that are specifically adapted to living with very wet winter and spring conditions followed by very dry summer and fall conditions. This term is defined in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*. Vernal pools are defined in the subsequent paragraph following the discussion of wetlands and streams. No revisions to the Draft EIR are required in response to this comment.

Response 6.109

The commenter suggests that Figure 4.3-2 should be corrected to include recent base aerial imagery.

Figure 4.3-2, Wetlands Within the Plan Area, located in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, uses the most up to date 2025 base aerial imagery provided by ESRI. No revisions to the Draft EIR are required in response to this comment.

Response 6.110

The commenter states that Figure 4.3-2 should show that Santa Maria Wastewater Treatment Plant and Laguna County Sanitation District discharge ponds are not freshwater ponds and identify basins for flood control recharge.

Based on on-the-ground expertise from the City of Santa Maria, Figure 4.3-2, Wetlands Within the Plan Area, located in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, has been updated to remove the “Freshwater Pond” label from the Santa Maria Wastewater plant and LCSD plant discharge ponds. Flood control and recharge basins are discussed in Section 4.8, *Utilities and Service Systems*.

Response 6.111

The commenter states paragraph two on page 4.3-7 should be deleted and states there are no barren lands in Santa Maria.

Refer to Response 6.102 for a discussion of barren lands and their presence in the city.

Response 6.112

The commenter suggests that the bulleted list on page 4.3-7 should be moved to precede the special status plant species discussion.

In response to the commenter’s statement, Subsection 4.3.1.b, *Special Status Species*, has been moved from its previous location following the “Barren Lands” paragraph to immediately follow the “Valley Foothill Riparian” paragraph, as shown below:

Valley Foothill Riparian

Valley foothill riparian is a native vegetation community that contains mostly winter deciduous trees, such as native cottonwood (*Populus* spp.), California sycamore (*Platanus racemosa*), and valley oak (*Quercus lobata*). The canopy height can grow up to 98 feet in a mature riparian forest. Typical understory shrub layer species include native California blackberry, blue elderberry (*Sambucus mexicana*), poison oak, and willows (*Salix* spp.). This vegetation community is found in valleys bordered by sloping alluvial fans, slightly dissected terraces, lower foothills, and coastal plains. They are generally associated with low velocity flows, flood plains, and gentle topography. Valleys provide deep alluvial soils and a high water table. The substrate is coarse, gravelly or rocky soils more or less permanently moist. Valley foothill riparian habitats provide food, water, migration and dispersal corridors, and escape, nesting, and thermal cover for an abundance of wildlife (CDFW 2025a).

b. Special Status Species

For the purposes of this analysis, special-status species were considered listed or non-listed special-status species if they were classified as one or more of the following:

▪ Listed Special-Status Species

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA), including proposed and candidate species.
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA).
- Plant species protected by the Native Plant Protection Act (NPPA) (State Rare).

▪ Non-listed Special-Status Species

- Species designated as Fully Protected (FP), Species of Special Concern (SSC), or Watch List (WL) by the CDFW
- Birds designated as a Bird of Conservation Concern (BCC) by USFWS
- Sensitive species designated by USFWS
- Sensitive species designated by the United States Forest Service (USFS)
- Plants assigned a California Rare Plant Rank of 1 through 4 by the California Native Plant Society (CNPS)
- Species protected under the Bald and Golden Eagle Protection Act
- Bats considered by the Western Bat Working Group to be “High” or “Medium” priority
- Species designated as locally important by the Local Agency and/or otherwise protected through ordinance, local policy, Habitat Conservation Plans (HCPs), or Natural Community Conservation Plans (NCCPs).

Queries of the USFWS’s IPaC, CNDDDB, and CNPS’s online Inventory of Rare and Endangered Plants of California (CRPR) were conducted to obtain comprehensive information regarding special-status species and sensitive vegetation communities

known or with potential to occur in the plan area. Queries of the CNPS inventory and CNDDDB database included the Santa Maria and Twitchell Dam United States Geological Service (USGS) 7.5-minute topographic quadrangle. The results of these scientific database queries are provided as Appendix B of this Environmental Impact Report (EIR).

Special-Status Plant Species

Based on the database queries and literature review, a total of 17 special-status plant species were evaluated for their potential to occur within the plan area (Appendix B). Of these species, 13 were identified with low potential to occur within the plan area. Appendix B shows the special-status plant species and habitat requirements for each species within the vicinity of the plan area.

Response 6.113

The commenter suggests that the reference to Appendix B in paragraph one on page 4.3-8 be changed to Appendix C.

In response to the commenter's statement, the following revision has been made to Subsection 4.3.1.b, *Special Status Species*:

The results of these scientific database queries are provided as Appendix C B of this Environmental Impact Report (EIR).

Response 6.114

The commenter suggests paragraph two on page 4.3-8 is revised to be more specific to the Santa Maria Valley, including the use of grasslands for cattle grazing and California tiger salamander habitat and removing the description of Roosevelt Elk in Santa Maria Valley.

Refer to Response 6.101 for a discussion of the descriptions of regional conditions from CDFW.

Response 6.115

The commenter suggests revising paragraph one on page 4.3-9 to clarify oak woodlands are not located in Santa Maria.

As described on page 12 of the City's Environmental Existing Conditions Report prepared by the City of Santa Maria in 2020, the Santa Maria River Valley includes oak woodland as a major plant association. The Draft EIR relies on readily available information including the previously prepared Existing Conditions Report to inform the EIR. No changes to the Draft EIR are required in response to this comment.

Response 6.116

The commenter suggests deleting paragraphs two and three on page 4.3-9 and asserts the information is not relevant to the area evaluated in the EIR.

As described on page 12 of the City's Environmental Existing Conditions Report prepared by the City of Santa Maria in 2020, the Santa Maria River Valley includes riparian scrub as a major plant association. Therefore, the two paragraphs cited by the commenter, which address various types of riparian woodland and shrubland, are applicable to the analysis in this EIR. The Draft EIR relies on

readily available information including the previously prepared Existing Conditions Report to inform the EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.117

The commenter suggests revising the Appendix B reference on page 4.3-10 to Appendix C. The commenter requests clarification on the area evaluated for special status plant species to occur.

In response to the commenter's statement, the following revisions have been made in Subsection 4.3.1.b, *Special Status Species*, of the EIR:

Based on the database queries and literature review, a total of 17 special-status plant species were evaluated for their potential to occur within the plan area (Appendix BC). Of these species, 13 were identified with low potential to occur within the plan area. Appendix BC shows the special-status plant species and habitat requirements for each species within the vicinity of the plan area.

Based on the database queries and literature review, a total of 31 special-status invertebrate, fish, amphibian, reptile, bird, and mammal species were evaluated for their potential to occur within the plan area (Appendix BC). Appendix BC, the Potential to Occur Table, describes habitat suitability for each special-status species and identifies the distance from the plan area at which each associated habitat type occurs, typically within 2 or 5 miles.

Response 6.118

The commenter states that paragraphs two and three on page 4.3-10 clarify that the potential for the 13 special status plant species to occur in the plan area is very unlikely as infill development has already reduced suitable habitat and the annexation area has been in continuous agricultural production for more than 100 years.

The discussion referred to by the commenter regarding special status species in Subsection 4.3.1.b, *Special Status Species*, identifies the potential for these special status plant species to occur as low. While urban infill has contributed to the low potential to occur for special status plant species, the reason for the plant species low potential to occur is not relevant to the potential impacts to these biological resources. No revisions to the Draft EIR are required in response to this comment.

Response 6.119

The commenter states the last two paragraphs on page 4.3-11 should be listed in bullets for clarity. The commenter provides suggestions regarding the descriptions of habitat for southern vernal pools, steelhead trout, la Graciosa thistle, and California red-legged frog. The commenter also states there is no mention of Lompoc yerba santa.

Subsection 4.3.1.d, *Sensitive Communities and Critical Habitat*, provides separate headers for sensitive communities and critical habitats to distinguish between the two. The only sensitive community in the plan area, Southern Vernal Pool, is described under the Sensitive Communities header. Critical habitats, including those for steelhead trout, La Graciosa thistle, California red-legged frog, and Lompoc yerba santa, are described under the Critical Habitat header. Converting the text from paragraph format to a bullet list would not affect the analysis or conclusions of the Draft EIR. Refer to Response 6.9 for a discussion of editorial changes that do not

pertain to the adequacy of the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.120

The commenter states that paragraph three on page 4.3-12 should be deleted. The commenter states that this paragraph is confusing and not relevant to Santa Maria as it references the Sierra Madre and San Rafael Mountains. The commenter suggests Figure 4.3-4 is inaccurate, as Santa Maria may serve as an area of wildlife connectivity but only a portion of the city is identified as Connections with Implementation Flexibility.

The reference to the Sierra Madre and San Rafael Mountains in Subsection 4.3.1.e, *Wildlife Movement Corridors*, is consistent with the information presented on page 13 of the City's Environmental Existing Conditions Report, as cited in the EIR. Although the Sierra Madre and San Rafael Mountains lie outside of the plan area, the riverbed is identified as a wildlife movement corridor in Figure 4.3-4, *Wildlife Connectivity Within the Plan Area*, extends into these ranges.

Figure 4.3-4, *Wildlife Connectivity Within the Plan Area*, located in Subsection 4.3.2.a, *Federal Regulations*, uses the most up to date 2025 base aerial imagery provided by ESRI. The plan area does not function entirely as a wildlife movement corridor because it is generally developed; however, as shown in Figure 4.3-4, some rural and undeveloped locations retain potential for habitat connectivity. No revisions to the Draft EIR are required in response to this comment.

Response 6.121

The commenter states that the Clean Water Act discussion on page 4.3-15 needs to discuss the Supreme Court's decision on Water of the United States.

The Draft EIR does not identify any specific impacts to Waters of the United States. Therefore, discussion of *Sackett vs. EPA* (May 2023) in which the Supreme Court narrowed the definition of Waters of the United States under the Clean Water Act is not necessary in the Clean Water Act discussion in Subsection 4.3.2.a, *Federal Regulations*, as it is not relevant or applicable to the analysis in the Draft EIR.

The 2045 General Plan Update has the potential to impact "Waters of the State." Waters of the State are discussed in Subsection 4.3.2.b, *State Regulations*, under the "Clean Water Act Section 401, Porter-Cologne Water Quality Control Act" heading. No revisions to the Draft EIR are required in response to this comment.

Response 6.122

The commenter asks if the United States Supreme Court's decision on Water of the United States has an influence on the definition of Waters of the State.

This comment does not pertain to the analysis in the Draft EIR. However, the 2045 General Plan Update is subject to Section 401 of the Clean Water Act, and any updates or amendments to the Act resulting from the Supreme Court's decision in *Sackett vs. EPA* (May 2023) would apply to the General Plan as relevant. Refer to Response 6.121 for a discussion on the rationale for not including a discussion of the Supreme Court's decision in *Sackett vs EPA* (May 2023) on the definition of Waters of the United States. No revisions to the Draft EIR are required in response to this comment.

Response 6.123

The commenter states the methodology discussion on page 4.3-20 should be revised to clarify that future infill projects and development in the Planning Area will not have biological impacts or trigger the need for surveys; the commenter suggests surveys would only be required for areas south of the airport and in the southernmost sections of the Orcutt Sphere of Influence.

Refer to Response 6.8 for a discussion on future individual projects requiring environmental review.

Response 6.124

The commenter suggests revising the Impact BIO-1 Summary to clarify biological impacts would only happen to the southernmost areas of the Orcutt area.

The Impact Summary statement under Impact BIO-1 is intended to provide a brief overview of the overall impact and is not meant to describe the specific locations where impacts may occur. The analysis under Impact BIO-1 in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, identifies where biological impacts have the potential to occur in the plan area. This analysis specifically discusses grassland, chaparral, riparian, wetland, and oak woodland communities that could serve as habitat for special-status species. Figure 4.3-1, *Vegetation Communities in the Plan Area*, in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*, illustrates the distribution of these habitat types in the plan area. No revisions to the Draft EIR are required in response to this comment.

Response 6.125

The commenter states the Impact BIO-1 discussion should clarify that special status species only occur in the southernmost areas of the Orcutt area. The commenter also states there is no incremental loss of habitat, fragmentation of open areas, or loss of wildlife corridors.

Grassland, chaparral, riparian, wetland, and oak woodland communities can serve as habitat for special-status species. These vegetation communities are shown in Figure 4.3-1, *Vegetation Communities in the Plan Area*, in Subsection 4.3.1.a, *Land Cover and Vegetation Communities*. While incremental habitat loss, fragmentation of open space, or disruption of wildlife corridors may not be occurring at present, such impacts could occur with implementation of the 2045 General Plan Update. Pursuant to CEQA Guidelines Section 15126.2(a), the EIR identifies all potentially significant environmental effects of a proposed project, including those related to biological resources. No revisions to the Draft EIR are required in response to this comment.

Response 6.126

The commenter states that Policy COS-1.1 should be deleted as it is infeasible and inconsistent with infill development and the annexation areas.

Policy COS-1.1 is proposed as part of the 2045 General Plan Update. Therefore, removing its reference from the Draft EIR would not change its applicability to future development facilitated by the 2045 General Plan Update. In addition, the policy is relevant to the analysis under Impact BIO-1 because it seeks to protect and expand natural habitat, wildlife corridors, natural wetlands, and other natural lands throughout the city and its Sphere of Influence. No revisions to the Draft EIR are required in response to this comment.

Response 6.127

The commenter states that Policy COS-1.3 should be revised to state the only place for planting biodiversity species is in City parks.

This comment does not pertain to the to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.128

The commenter states the Impact BIO-1 discussion should be revised to indicate the 13 special status plant species are not located in the City, Sphere of Influence, or annexation area.

Refer to Response 6.118 for a discussion of the location of special status plant species in the plan area.

Response 6.129

The commenter states that the second paragraph of the Impact BIO-1 discussion should be deleted since none of the special status plant species mentioned are located in Santa Maria.

As documented in Appendix C, Potential to Occur Table, either suitable habitat for 13 special status plant species exists in or near the plan area, or there have been recorded occurrences of these species in the plan area. Although the likelihood of these species occurring in the plan area is low, it is not zero. Because the potential to occur cannot be entirely ruled out, a potentially significant impact must still be disclosed and evaluated in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.130

The commenter states that the Special-Status Wildlife species discussion in Impact BIO-1 clarifies that no wildlife species are found in Santa Maria or the annexation area, and no additional biological studies are needed in these areas.

Refer to Responses 6.124 and 6.125 for a discussion on where special-status species may occur in the plan area. Refer to Response 6.8 for a discussion on future individual projects requiring environmental review.

Response 6.131

The commenter asks what the “Plan Area” is for reptiles. They also suggest revising the reptiles discussion in Impact BIO-1 to a no significant impact conclusion based on the idea that no species have been found in Santa Maria or the annexation area.

The “Plan Area” is defined in Subsection 2.3.1, *Regional Location*. It is defined as all land in the Santa Maria Sphere of Influence and includes the annexation of areas east of the city limits. Similar to the discussion in Response 6.129, although the likelihood of special status reptiles to occur in the plan area is low, it is not zero. Therefore, a potentially significant impact must be disclosed and evaluated in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.132

The commenter states the Mammals discussion in Impact BIO-1 is not relevant as there are no known bat colonies or badger dens in Santa Maria or the annexation area.

As disclosed in Appendix C, Potential to Occur Table, both pallid bat and American badger habitat exists in the plan area and there are recorded occurrences of these species within five miles of the plan area. As potential development facilitated by the 2045 General Plan Update could result in permanent loss of suitable habitat, significant impacts to special status mammals cannot be ruled out. No revisions to the Draft EIR are required in response to this comment.

Response 6.133

The commenter states the Invertebrates discussion in Impact BIO-1 should be revised to state none of the described invertebrates have been identified in Santa Maria or the annexation area.

As disclosed in Appendix C, Potential to Occur Table, there are recorded occurrences of vernal pool fairy shrimp and monarch butterflies within five miles of the plan area and suitable habitat for both species exist in the plan area. This information indicates these special status invertebrates have the potential to occur in the plan area and could therefore be impacted by potential development facilitated by the 2045 General Plan Update. No revisions to the Draft EIR are required in response to this comment.

Response 6.134

The commenter states the Birds discussion in Impact BIO-1 should be revised to remove the paragraph referencing burrowing owls claiming none have been identified in Santa Maria or the annexation area.

As disclosed in Appendix C, Potential to Occur Table, there are recorded occurrences of burrowing owls within five miles of the plan area and suitable habitat for them to exist in the plan area. This information indicates this special status bird has the potential to occur in the plan area and could therefore be impacted by potential development facilitated by the 2045 General Plan Update. No revisions to the Draft EIR are required in response to this comment.

Response 6.135

The commenter states the Amphibians discussion in Impact BIO-1 should be revised to clarify none of the described amphibians are located in the Santa Maria infill sites or the annexation area, and no additional studies are needed for these areas.

Refer to Response 6.8 for a discussion on future individual projects requiring environmental review.

Response 6.136

The commenter states that Mitigation Measure BIO-1(a) should be reduced to only focus on Santa Maria claiming it is not applicable to infill development or the annexation area. The commenter states most infill projects will be exempt from environmental review and the City should make clear there would be no need for most future biological studies.

Mitigation Measure BIO-1(a), in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, provides flexibility by stating that a Biological Resources Screening and Assessment is required only

“if determined necessary based on preliminary review conducted by City staff.” As such, the measure does not automatically require all future projects to prepare such an assessment; rather, it allows City staff to exempt projects when appropriate. No revisions to the Draft EIR are required in response to this comment.

Response 6.137

The commenter states that Mitigation Measure BIO-1(b) should be deleted or be revised to only apply to the southern area of Orcutt as no special-status plants are in Santa Maria or the annexation area.

Mitigation Measure BIO-1(b) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, applies to development facilitated by the 2045 General Plan Update. Mitigation Measure BIO-1(b) would be required only if the Biological Resources Screening Assessment (if required under Mitigation Measure BIO-1[a]) determines that there is potential for significant impacts to federally or state-listed plants or regional population level impacts to species with a California Rare Plant Rank of 1B or 2B from project development. Refer to Response 6.136 for a discussion of the applicability of Mitigation Measure 1(a). If it is determined that a future individual project would not impact special status species, then this mitigation measure would not be triggered. No revisions to the Draft EIR are required in response to this comment.

Response 6.138

The commenter states that Mitigation Measures BIO-1(c) and BIO-1(d) should be deleted claiming they are not applicable to Santa Maria or the annexation area.

Mitigation Measures BIO-1(c) and (d) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, are applicable to development facilitated by the 2045 General Plan Update. Refer to Responses 6.129, 6.136, and 6.137 for an explanation of their applicability to future development facilitated by the 2045 General Plan Update. Additionally, the mitigation measures are clear in that they only apply to future development that has the potential to impact special status species, as determined by site specific biological surveys. If it is determined that a future individual project would not impact special status species, then these mitigation measures would not be triggered. No revisions to the Draft EIR are required in response to this comment.

Response 6.139

The commenter states that Mitigation Measures BIO-1(e) and BIO-1(f) should be deleted claiming they are not applicable to Santa Maria or the annexation area.

Mitigation Measures BIO-1(e) and (f) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, are applicable to development facilitated by the 2045 General Plan Update. Refer to Responses 6.130, 6.131, 6.132, 6.133, 6.134, 6.135, 6.136, 6.137, and 6.138 for an explanation of their applicability to future development facilitated by the 2045 General Plan Update. Additionally, the mitigation measures are clear in that they only apply to future development that has the potential to impact special status species, as determined by site specific biological surveys. If it is determined that a future individual project would not impact special status species, then these mitigation measures would not be triggered. No revisions to the Draft EIR are required in response to this comment.

Response 6.140

The commenter states that Mitigation Measure BIO-1(g) is appropriate for inclusion in the EIR.

The commenter's support for the inclusion of Mitigation Measure BIO-1(g) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, is acknowledged. No revisions to the Draft EIR are required in response to this comment.

Response 6.141

The commenter states that Mitigation Measure BIO-1(h) should be deleted claiming it is not applicable to Santa Maria or the annexation area.

Mitigation Measure BIO-1(h) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, is applicable to development facilitated by the 2045 General Plan Update. Refer to Responses 6.131 and 6.136 for an explanation of its applicability to future development facilitated by the 2045 General Plan Update. Additionally, the mitigation measure is clear that it would apply to future development that has the potential to impact Northern California legless lizard, as determined by preliminary review conducted by City staff. If it is determined that a future individual project would not impact Northern California legless lizard, then this mitigation measure would not be triggered. No revisions to the Draft EIR are warranted in response to this comment.

Response 6.142

The commenter states that Mitigation Measure BIO-1(i) should be reduced to only state if bats are discovered then a standard study will apply.

The level of detail in Mitigation Measure BIO-1(i) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, would ensure that the prescribed methods for avoidance and impact minimization to potential bat roosts are clear, enforceable, and practical. This level of detail is necessary because it provides specific steps and performance standards that agencies and contractors can follow, reducing ambiguity and ensuring compliance. No revisions to the Draft EIR are required in response to this comment.

Response 6.143

The commenter states that Mitigation Measure BIO-1(j) should be clarified to state it only applies to sites with eucalyptus trees in the southern part of Santa Maria and the Orcutt area.

Mitigation Measure BIO-1(j), in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, is intentionally broad to provide flexibility for future conditions. Rather than narrowly applying to a specific area, the measure requires a Biological Resources Screening and Assessment only "if determined necessary based on preliminary review conducted by City staff" and is further limited to development within undeveloped parcels. This approach allows City staff to evaluate potential impacts of development facilitated by the 2045 General Plan on monarch butterfly habitat as conditions evolve. While the southern portion of Santa Maria and the Orcutt area may currently represent the most likely locations for monarch butterflies, the measure avoids unnecessarily excluding other areas in the plan area that could support monarch habitat in the future. By allowing case-by-case review, the measure ensures that monarch butterflies receive appropriate protection wherever they occur, without imposing unnecessary requirements on projects where impacts are unlikely. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 6.144

The commenter states that Mitigation Measure BIO-1(k) is too burdensome and states that very few projects in Santa Maria and the annexation area would require bird surveys.

The level of detail in Mitigation Measure BIO-1(k) in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, would ensure that the prescribed methods for avoidance and impact minimization to potential bird nests are clear, enforceable, and practical. This level of detail is required for the EIR because it provides specific steps and performance standards that agencies and contractors can follow, reducing ambiguity and ensuring compliance. No revisions to the Draft EIR are required in response to this comment.

Response 6.145

The commenter states that the Significance After Mitigation discussion should state that the city of Santa Maria and the annexation area have no known special-status species and do not require additional surveys, aside from birds or bats.

Refer to Response 6.124, 6.125, and 6.129 for a discussion on the potential for special-status species to occur in the plan area. Mitigation Measures BIO-1(a) through BIO-1(k), in Section 4.3, *Biological* Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, provide a comprehensive framework to address potential impacts by requiring site-specific biological assessments and surveys for future projects when warranted. These measures ensure that if nesting birds, bats, or other sensitive species are identified during project-level review, appropriate surveys and mitigation would be implemented. Therefore, the Draft EIR already accounts for the potential occurrence of special-status species and includes enforceable measures to protect biological resources as needed. No revisions to the Draft EIR are required in response to this comment.

Response 6.146

The commenter suggests revising the Significance After Mitigation discussion to remove mitigation based on previous comments.

None of the Mitigation Measures previously mentioned by the commenter, Mitigation Measures BIO-1(a) through BIO-1(k), in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, would be removed from the Draft EIR as they are all applicable and necessary to reduce potentially significant impacts to biological resources. Refer to Responses 6.136, 6.137, 6.140, 6.141, 6.142, 6.143, and 6.144 for a discussion of Mitigation Measures BIO-1(a), BIO-1(b), BIO-1(g), BIO-1(h), BIO-1(i), BIO-1(j), and BIO-1(k). No revisions to the Draft EIR are required in response to this comment.

Response 6.147

The commenter suggests revising the Impact BIO-2 Summary to clarify there are no wetlands in the infill portions of the City or the annexation area, and the only impact to wetlands would be during construction which would be minimized with applicable National Pollutant Discharge Elimination System permits.

Refer to Response 6.110 for a discussion of revisions to Figure 4.3-2. Refer to Response 6.124 for a discussion on the Impact Summary statement and its intent in the Draft EIR. The analysis that immediately follows the Impact Summary statement, in Subsection, 4.3.3.b, *Project Impact and Mitigation Measures*, provides the specifics requested by the commenter, including location of

wetlands in the plan area. In addition, the analysis in Impact BIO-2 explains that development facilitated by the plan would be subject to National Pollutant Discharge Elimination System permit requirements to protect water quality prior to, during, and post-construction. No revisions to the Draft EIR are required in response to this comment.

Response 6.148

The commenter suggests revising the Impact BIO-2 discussion to state there are no marine habitats or freshwater ponds in Santa Maria or the annexation area. The commenter states Figure 4.3-2 needs corrections, and points out manmade basins and channels designed to dry up for most of the year.

Refer to Response 6.110 for a discussion of revisions to Figure 4.3-2. Additionally, the following revision has been made to Impact BIO-2:

The CNDDDB identifies southern vernal pool as a sensitive natural community which could occur in the plan area. According to the USFWS NWI, wetlands in and surrounding the City consist of ~~estuarine and marine habitats~~, freshwater ponds, freshwater emergent wetlands, freshwater forested and shrub wetlands, and riverine habitats (USFWS 2025c). Development facilitated by the plan is not likely to result in the removal of large areas of riparian, wetland, or other sensitive natural community habitat, as development would generally occur in areas of the City that are developed and surrounded by existing development.

However, there remains potential to affect the few freshwater ponds, freshwater emergent wetlands, freshwater forested and shrub wetlands, and riverine habitats that are identified throughout the plan area. As stated in Subsection 4.3.3.b, *Project Impacts and Mitigation Measures*, 2025 data from the United States Fish and Wildlife Service National Wetlands Inventory indicate that wetlands in and around the City include freshwater ponds, freshwater emergent wetlands, freshwater forested and shrub wetlands, and riverine habitats. The National Wetlands Inventory is a reliable, government-managed resource widely used for environmental analysis in EIRs because it provides comprehensive and up-to-date wetland mapping data. Refer to Response 6.110 for a discussion on revisions to Figure 4.3-2. No revisions to the Draft EIR are required in response to this comment.

Response 6.149

The commenter suggests deleting Policies COS-1.1 and COS-1.3 in the Impact BIO-2 discussion due to infeasibility, as well as revising Policy COS-1.5 to focus only on birds and bats.

As discussed under Response 6.126, Policy COS-1.1 is proposed as part of the 2045 General Plan Update; therefore, removing its reference from the EIR would not change its applicability to future development facilitated by the Plan. This applies to all policies proposed in the 2045 General Plan Update. This comment does not pertain to the to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.150

The commenter suggests revising the Mitigation Measure and Significance After Mitigation discussion in Impact BIO-2 to remove reference to any mitigation removed as a result of previous comments.

Refer to Response 6.146 for a discussion of mitigation measure applicability and changes to the Significance After Mitigation section.

Response 6.151

The commenter states Policies COS-1.1 and COS-1.3 should be deleted from Impact BIO-3 and Impact BIO-4 discussions, as well as revising Policy COS-1.5 to focus only on birds and bats. The commenter states Policy COS-3.1 should be revised stating an Urban Forest Management Plan has not been adopted and the infeasibility of expanding the urban canopy by 20 percent.

This comment does not pertain to the to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.152

The commenter states the Cumulative Impacts discussion on pages 4.3-38 and 4.3-39 should be revised to state there are no known special-status species or wetlands in the City or annexation area. The commenter suggests focusing on California tiger salamander vernal pools in the south at the airport and Area 7.

Refer to Response 6.124 for a discussion on the potential for special-status species to occur in the plan area. Refer to Response 6.147 for a discussion on wetlands in the plan area.

Response 6.153

The commenter states the EIR should include figures to page 4.4-2 showing the Historic Overlay District and where known resources are located. They also state this suggested map should also show potential cultural resources in Santa Maria.

The Historic Overlay District is a zoning designation intended to encourage but not mandate the preservation of architecturally significant structures. This zoning designation is not relevant to the discussion of existing historic and cultural resources within the city. However, the City provides a map showing Zoning Designations on their website, this map includes the designated Historic Overlay District.

(<https://www.cityofsantamaria.org/home/showpublisheddocument/10037/638563088414970000>)

Known historical resources within the plan area are listed in Subsection 4.4.1.b, *Historic-Era Setting*, the location of these resources can be found on the City's website for Historical Landmarks and Objects of Historical Merit

(<https://storymaps.arcgis.com/stories/fa9559c0f4f6467989211f32fb788073>). Inclusion of these maps in the EIR would not impact the overall analysis or conclusion of the analysis, and these maps are available to the public through the City's website. No revisions to the Draft EIR are required in response to this comment.

Response 6.154

The commenter states that all regulations mentioned on pages 4.4-4 through 4.4-8 must include the respective dates of their adoption.

CEQA Guidelines Section 15125 requires an EIR to describe the existing environmental setting and identify applicable federal, state, and local plans, policies, and regulations relevant to the project. It requires a summary of these regulations to provide context for the analysis, but it does not explicitly require inclusion of adoption dates for all applicable federal and state laws. Subsection 4.4.2, *Regulatory Setting* identifies and summarizes applicable laws and regulations. No revisions to the Draft EIR are required in response to this comment.

Response 6.155

The commenter suggests revising the Santa Maria Municipal Code to change the age requirement for historic buildings.

This comment does not pertain to the environmental analysis presented in the Draft EIR. However, the commenter's suggestion will be provided to the decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.156

The commenter suggests revising the Resource Management Element discussion on page 4.4-9 to state that this General Plan element is the old element, to include Figure RME-5 in the EIR and new General Plan elements, to add explanation to the low sensitivity for cultural resources in Santa Maria Valley, and to add that a historic riverbed is now a bluff north of Betteravia Road and some cultural resources sites are located in the Orcutt area near Orcutt and Solomon Creek. The commenter suggests adding this information to the Conservation and Open Space Element of the 2045 General Plan Update.

The discussion regarding the Resource Management Element in Subsection 4.4.2.c, *Local Regulations*, states that the element being discussed is the "City's current Resource Management Element." This discussion is a summary of the City's current Resource Management Element and is not part of the environmental impact analysis. The information requested by the commenter regarding cultural sensitivity is addressed in the impact analysis in Section 4.4, *Cultural Resources and Tribal Cultural Resources*, Subsection 4.4.3.b, *Project Impacts and Mitigation Measures*. Regarding the information provided by the commenter about a historical riverbed and flooding in the Santa Maria Valley, without proper citations to include supporting evidence, this information cannot be relied upon for the EIR analysis. The historical setting information in the EIR is based on a review of readily available sources, including the City's list of Historical Landmarks and Objects of Historical Merit, the City's current Resource Management Element, the State Office of Historic Preservation website, and the National Park Service. No revisions to the Draft EIR are required in response to this comment.

Response 6.157

The commenter states that the last paragraph on page 4.4-11 should clarify that before 1960 the City of Santa Maria had a population of about 35,000 and approximately 9,000 housing units, mostly

within a 4-square-mile area. The commenter notes that the City now has nearly 30,000 units, many of which were built over the last 70 years and are primarily tract homes and apartments. The commenter further suggests revising the City ordinance to specify that tract homes and units built after 1960 are not considered historic.

The specific information provided by the commenter does not pertain to the environmental analysis presented in the Draft EIR, nor would the referenced information change the conclusion that, over the 20-year planning horizon through 2045, additional buildings will exceed the benchmark age threshold and may qualify as potential historic resources. Suggestions for revisions to documents outside the Draft EIR, such as the City ordinance referenced by the commenter will be provided to decision makers for their consideration. No revisions to the Draft EIR are required in response to this comment.

Response 6.158

In regards to Action COS 7.1.1, the commenter asks where the Historic Overlay District is located and where it should be expanded.

Refer to Response 6.153 for a discussion of the Historic Overlay District. This comment does not pertain to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.159

The commenter states that Mitigation Measure CUL-1 should be revised to note the City's ordinance is for buildings 50 years or older and development since 1960 should not be considered historic.

In response to the commenter's suggestion, the following revisions have been made:

CUL-1 Historical Built Environment

If determined necessary based on preliminary review conducted by City staff, applicants for new discretionary development projects that propose to significantly alter or demolish any historic-age features (i.e., structures determined to be over ~~50~~⁴⁵ years of age based on available City records, such as permitting records) shall be required to submit a historical resources evaluation prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards in architectural history or history (36 CFR Part 61). The report shall address areas containing buildings, structures, objects, sites, landscape/site plans, or other features that are ~~50~~⁴⁵ years of age or older and are proposed to be altered or demolished as a part of the proposed project. The evaluation shall include an intensive-level evaluation in accordance with the guidelines and best practices meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The historical resources evaluation report shall be submitted to the City for review and approval. If historical resources are identified through the survey and evaluation, the relocation, rehabilitation, or alteration of the resource shall be completed consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). Applicants shall submit a report to the City that identifies and

specifies the treatment of character-defining features and construction activities, and demonstrates how the project complies with the Standards and avoids the substantial adverse change in the significance of the historical resource as defined by CEQA Guidelines Section 15064.5(b). The report shall be prepared by an architectural historian or historical architect meeting the Professional Qualifications Standards as defined by 36 CFR Part 61 and provided to the City for review and concurrence prior to project approval.

Page 4.4-11:

New residential, commercial, and industrial uses would be introduced through both new construction and the conversion of existing properties to different land use designations. The plan's emphasis on increased density and clustered development increases the likelihood of redevelopment, or additional development, on already-developed lots. Future development may involve renovations, demolitions, or new construction, which could affect historical resources that have not yet been formally evaluated but may be eligible for listing on the NRHP, CRHR, or local registers under CEQA. Over the 20-year planning horizon through 2045, additional buildings will surpass the 450-year age threshold, making them potential historic resources. As a result, redevelopment activities could lead to the physical demolition, destruction, relocation, or alteration of such resources.

Response 6.160

The commenter suggests the second paragraph of the Impact CUL-2 discussion should be revised to clarify impacts to archaeological resources would occur only south of Betteravia Road.

The commenter's suggestion to limit the disclosure of potential impacts to archaeological resources in Subsection 4.4.3.b, *Project Impacts and Mitigation Measures*, to areas south of Betteravia Road would not provide adequate disclosure of the project's potential environmental impacts under CEQA. It is not possible to determine with certainty where archaeological resources may exist below the ground surface, and restricting the analysis to a single portion of the city could omit locations from environmental review where resources may be present. CEQA Guidelines Section 15126.2 requires that an EIR evaluate all potentially significant environmental effects of a project throughout the entire plan area. For this reason, the Draft EIR considers the potential for archaeological resources across the full plan area. No revisions to the Draft EIR are required in response to this comment.

Response 6.161

The commenter suggests the third paragraph of the Impact CUL-2 discussion should be revised to clarify that impacts to archaeological resources would occur only south of Betteravia Road.

Refer to Response 6.160 for a discussion of potential impacts to archaeological resources.

Response 6.162

The commenter suggests Mitigation Measures CUL-2(a), CUL-2(b), and CUL-2(c) should only apply to development south of Betteravia Road.

Refer to Response 6.160 for a discussion of potential impacts to archaeological resources.

Response 6.163

The commenter suggests the Impact CUL-4 discussion and Mitigation Measures CUL-4(a) and CUL-4(b) are revised to only apply to development south of Betteravia Road.

Refer to Response 6.160 for a discussion of potential impacts to archaeological resources.

Response 6.164

The commenter states that the last paragraph of Impact CUL-4 implies all future projects will require tribal consultation, which the commenter views as unnecessary because consultation was already conducted for the General Plan update and planning area without response. The commenter expresses concern that requiring additional consultation would result in extra time and cost. They also request revisions to Mitigation Measures CUL-4(a) and (b) but do not specify which revisions they would like to see.

Subsection 4.4.3.b, *Project Impacts and Mitigation Measures*, explains that development facilitated by the plan would undergo project-specific tribal cultural resource consultation pursuant to Public Resources Code (PRC) Section 21084.2 and Policy COS-7.3. PRC Section 21084.2 requires consultation only for projects that may cause a substantial adverse change in the significance of a tribal cultural resource. This requirement does not apply to all future projects. For example, projects that are exempt from CEQA would not require consultation. The EIR accurately describes CEQA requirements, which mandate consultation only when a project could result in significant impacts to tribal cultural resources.

Because the commenter does not recommend any specific revisions to Mitigation Measures CUL-4(a) and (b) or provide evidence that any revisions are necessary, no revisions to the Draft EIR are required in response to this comment.

Response 6.165

The commenter states that the Cumulative Impacts discussion on page 4.4-19 should specify that only structures within the 4-square-mile area are considered potentially historic based on construction dates. The commenter recommends limiting additional studies for future development to this area and suggests amending the ordinance to apply only to buildings in this area that were built before 1960, or possibly earlier.

Refer to Responses 6.157 and 6.160 for a discussion regarding structures that may qualify as potential historic resources and restricting environmental analysis to portions of the plan area, as opposed to the whole plan area. The comment regarding revisions to the ordinance does not pertain to the environmental analysis presented in the Draft EIR. Comments related to the revision of other City documents will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.166

The commenter suggests additional information regarding Twitchell Dam, the State Water Project, wastewater discharge, Santa Maria River Valley Groundwater Basin adjudication, agricultural

conservation, and reduced urban water use be added to the setting of the Hydrology and Water Quality section.

The information provided by the commenter pertains primarily to water management and water supply. These topics are discussed in detail in Section 4.8, *Utilities and Service Systems*. The evaluation of hydrology and water quality considers potential impacts related to impairment of water quality, groundwater recharge, alterations of drainage patterns, pollutant release, and conflicts with water quality control plans and sustainable groundwater management plans. No revisions to the Draft EIR are required in response to this comment.

Response 6.167

The commenter suggests revising the last sentence of the Groundwater discussion in Section 4.5, Hydrology and Water Quality, to state that groundwater blended is State water used for industrial, municipal, and government uses within the city.

The language the commenter refers to in Subsection 4.5.1.b, Groundwater, is accurate and describes the current use of groundwater in Santa Maria. No revisions to the Draft EIR are required in response to this comment.

Response 6.168

The commenter suggests revising the first paragraph of the Surface Water Quality discussion in Section 4.5, Hydrology and Water Quality, to clarify that agricultural operations are not a substantial source of pollutants in Santa Maria and that all urban agricultural operations are located to the west of Santa Maria and would not impact surface water in Santa Maria.

The information included within Subsection 4.5.1.c, Surface Water Quality, is derived from the General Plan Environmental Existing Conditions Report, prepared by the City of Santa Maria in 2020. The General Plan Environmental Existing Conditions Report represents the most recent available information regarding stormwater runoff from agricultural operations in Santa Maria.

In response to this comment, the following revision has been made to Subsection 4.5.1.c, Surface Water Quality:

Land use affects the quality of surface water in the city. There are large agricultural ~~operations~~ uses within the city ~~that may~~ contribute to surface water pollution. These ~~operations-uses~~ are a ~~substantial~~ source of sediment which enters the city's storm drain system (City of Santa Maria 2020). Additionally, pesticides, herbicides, and fertilizer are pollutants associated with agricultural ~~operations~~ uses that affect surface water quality within the city. Pollutants within urbanized areas of the city, such as heavy metals hydrocarbons, detergents, fertilizers, and pesticides, and construction activities which can cause erosion are additional sources of surface water pollution which impact water quality within the city (City of Santa Maria 2020).

Response 6.169

The commenter suggests revising the second paragraph of the Surface Water Quality discussion in Section 4.5, Hydrology and Water Quality, to separate the discussion of the Santa Maria River from the rest of the paragraph, and to state that the chemicals mentioned in this discussion are being reduced by agricultural operators.

The comment pertaining to paragraph delineation does not pertain to the analysis presented in the Draft EIR, nor would it change the analysis within the Draft EIR. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

The information on chemicals and total maximum daily loads provided in Subsection 4.5.1.c, Surface Water Quality, in the Draft EIR are based on information from the California State Water Board and represent existing conditions. No revisions to the Draft EIR are required in response to this comment.

Response 6.170

The commenter states that the Groundwater Quality discussion in Section 4.5, Hydrology and Water Quality, should be revised to note that total dissolved solids levels have improved over the last 30 years. The commenter suggests adding the second sentence of the paragraph to the Surface Water Quality discussion and revising the whole paragraph.

The Groundwater Quality discussion in Subsection 4.5.1.c, *Water Quality*, accurately describes the current conditions of groundwater quality within the plan area and meets the requirements of CEQA Guidelines Section 15125, which requires an EIR to describe the existing environmental setting and identify applicable federal, state, and local plans, policies, and regulations relevant to the project. This section specifies that the environmental setting must include a description of the physical environmental conditions in the vicinity of the project, which serves as the baseline for determining the significance of impacts. The commenter's suggested revisions would not alter the analysis or conclusions within the EIR. Therefore, no revisions to the Draft EIR are required in response to this comment.

Response 6.171

The commenter suggests revising the Flood Hazards discussion to include information on City collaboration with the County of Santa Barbara Flood Control and Water Conservation District, the Santa Maria levee, and the Twitchell Dam. The commenter asks where the location of Guadalupe Lake is and what a seiche is.

The Flood Hazards discussion in Subsection 4.5.1.c, *Water Quality*, sufficiently describes the current conditions of flood hazards within the plan area and meets the requirements of CEQA Guidelines Section 15125, which requires an EIR to describe the existing environmental setting and identify applicable federal, state, and local plans, policies, and regulations relevant to the project. This section specifies that the environmental setting must include a description of the physical environmental conditions in the vicinity of the project, which serves as the baseline for determining the significance of impacts. The commenter's suggested revisions would not alter the analysis or conclusions within the Draft EIR.

As discussed in Section 4.5.1.d, Guadalupe Lake is located approximately three miles from the city. A seiche is a standing wave that occurs in an enclosed or partially enclosed body of water, such as a lake. It is typically caused by external forces like strong winds, atmospheric pressure changes, or seismic activity. As discussed in Impact HYD-4, the city is not at risk of being inundated due to seiche. In response to this comment, the following revisions have been made to correct the spelling of "Guadalupe" in Subsection 4.5.1.c:

Groundwater quality varies within the Santa Maria Valley. Total dissolved solids are known pollutants in groundwater within the Santa Maria Watershed. Additionally, petroleum production by-product (diluent) has been found in groundwater below the Guadalupe Dunes and nearby areas (City of Santa Maria 2020).

In addition, the following revisions have been made to correct the spelling of “Guadalupe” in Subsection 4.5.1.d:

Santa Maria is approximately 11.4 miles east of the Pacific Ocean. According to the California Department of Conservation, no part of the city is within a tsunami hazard zone (DOC 2025). The city is approximately three miles from Guadalupe Lake. Due to the distance and intervening topography, the city is not at risk of being inundated due to a seiche.

Response 6.172

The commenter suggests revising Figure 4.5-1 to label the Santa Maria River, Santa Maria levee, and Orcutt Creek. The commenter suggest including a regional map to show the location of Twitchell Dam and Guadalupe Lake.

Figure 4.5-1, Flood Hazards in Santa Maria, in Subsection 4.5.2.a, *Federal Regulations*, illustrates flood hazards within the City and highlights the Santa Maria River and Guadalupe Lake as being within the 100-year floodplain. In response to this comment, Figure 4.5-1 has been updated in the Final EIR.

Response 6.173

The commenter suggests including a discussion on the Supreme Court decision regarding the definition of Waters of the United States in the Regulatory Setting discussion on page 4.5-5.

Refer to Response 6.121 for a discussion on the rationale for not including a discussion of the Supreme Court’s decision in *Sackett v. EPA* (May 2023) on Waters of the United States.

Response 6.174

The commenter suggests revising the language in Policy S-3.3 to read “onsite detention basins” rather than onsite detention ponds. The commenter suggests revising Policy S-3.4 to state “Coordinate with County Flood Control to maintain and upgrade...”.

This comment does not pertain to the to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.175

The commenter suggests revising the impact summary of Impact HYD-2 to state “Development facilitated by the 2045 General Plan would incrementally increase...”. The commenter suggests stating that the Santa Maria Water Conservation District and Twitchell Management Authority would assure adequate groundwater quality and groundwater elevations within the basin.

The commenter is referring to the Impact Summary statement in Subsection 4.5.3.b, *Project Impacts and Mitigation Measures*. The Impact Summary statement is intended to provide a brief overview of the overall impact. The following impact analysis provides additional details regarding potential impacts of the 2045 General Plan Update. In addition, the first sentence of the impact analysis states that development facilitated by the plan would incrementally increase the amount of impervious surface area, as requested by the commenter. No revisions to the Draft EIR are required in response to this comment.

Response 6.176

The commenter suggests revising the first sentence of Impact HYD-2 to clarify that impervious surface areas could be increased within the infill areas of Santa Maria and the annexation area, which would result in incremental reductions in recharge and infiltration. The commenter also suggests removing the word "River" from "Santa Maria River Valley Basin."

The reference to the Santa Maria River Valley Basin in Subsection 4.5.3.b, *Project Impacts and Mitigation Measures*, is correct as written in the Draft EIR and does not need to be changed. The commenter's statement that these changes would occur incrementally is conveyed in the first part of the sentence. No revisions to the Draft EIR are required in response to this comment.

Response 6.177

The commenter suggests removing the last sentence in the second paragraph of the Impact HYD-2 discussion.

The sentence referred to by the commenter in Subsection 4.5.3.b, *Project Impacts and Mitigation Measures*, states that implementation of general plan policy S-3.3 would help reduce impervious surfaces associated with construction under the 2045 General Plan Update by requiring low-impact design features, such as permeable pavement. This policy is intended to minimize the amount of new impervious surfaces to the greatest extent feasible. No revisions to the Draft EIR are required in response to this comment.

Response 6.178

The commenter asks for details regarding groundwater rights the City has based on the adjudication of the groundwater basin and notes groundwater supplies are augmented by other water supplies. The commenter also suggests removing the word "River" from instances of the use of "Santa Maria River Valley Basin."

Additional information on the City's groundwater rights is included in Subsection 4.5.2.c, *Local Regulations*. Refer to Response 6.176 for a discussion on the correct terminology for the Santa Maria River Valley Basin. No revisions to the Draft EIR are required in response to this comment.

Response 6.179

The commenter states the Rivergate Roemer Specific Plan area is within the 100-year floodplain and development in that area will need to be elevated above the floodplain and a map revision will need to be processed with FEMA.

All new development facilitated by the General Plan Update would comply with applicable local, state, and federal regulations governing development in flood hazard areas. No revisions to the Draft EIR are required in response to this comment.

Response 6.180

The commenter suggests correcting the spelling of Guadalupe Lake in Impact HYD-4, adding an explanation that the levee protects Santa Maria in the event of a Twitchell Dam failure, and removing the reference to Lopez Reservoir due to its distance from Santa Maria. The commenter also requests a definition of a seiche.

The following revision has been made to Subsection 4.5.3.b, *Project Impacts and Mitigation Measures*:

“The city is approximately three miles from Guadalupe Lake.”

The analysis in Impact HYD-4 indicates that the city is not within the dam inundation area for Lopez Reservoir or Twitchell Reservoir. Therefore, if either dam failed, the floodwaters would not be anticipated to reach the city, based on the California Division of Safety of Dams information as cited in Impact HYD-4. Refer to Response 6.171 for a definition of seiche.

Response 6.181

The commenter suggests that the Bureau of Land Management, United States Army Corps of Engineers, and other federal agencies should be added to Policy S-3.6 for coordination regarding dam and levee safety and inundation.

This comment does not pertain to the to the environmental analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.182

The commenter suggests that Impact HYD-5 is inaccurate, as there is an adjudicated order management plan coordinated with the Twitchell Management Authority and the Santa Maria Water Conservation District. The commenter requests the discussion be rewritten to define the agencies that manage the groundwater basin.

The Twitchell Management Authority prepares annual reports that document existing groundwater conditions in the Santa Maria Valley Basin and provide recommendations for management actions. While the Twitchell Management Authority plays an important role in monitoring and reporting, it does not enforce policies or conservation measures. This management authority differs from government agencies that implement and enforce Sustainable Groundwater Management Plans under the Sustainable Groundwater Management Act. The Twitchell Management Authority’s reports do not constitute a Sustainable Groundwater Management Plan under the Sustainable Groundwater Management Act. A Sustainable Groundwater Management Plan includes components such as basin setting, water budgets, sustainable management criteria, projects and actions, and monitoring networks to achieve long-term groundwater sustainability. The Twitchell

Management Authority's role is focused on reporting and recommending actions within the adjudicated framework, rather than implementing a comprehensive sustainability plan.

According to the City of Santa Maria's Urban Water Management Plan, the Twitchell Management Authority also functions as a transfer agency, facilitating permanent and temporary transfers of water rights within the Santa Maria River Valley Basin. However, these water transfers are administrative actions related to water allocation and are not connected to water quality, which is the focus of Section 4.5, *Hydrology and Water Quality*. No revisions to the Draft EIR are required in response to this comment.

Response 6.183

The commenter suggests revising the Cumulative Impacts discussion on pages 4.5-16 and 4.5-17 based on previous comments on the Hydrology and Water Quality section.

The commenter's statement regarding the cumulative impacts discussion is general and does not include specific recommendations for edits or clarifications. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis. No revisions to the Draft EIR are required in response to this comment.

Response 6.184

The commenter suggests revising the Cumulative Impacts discussion on pages 4.5-16 and 4.5-17 to discuss the Twitchell Management Authority's influence on groundwater quality and quantity within the basin.

Refer to Response 6.182 for a discussion of the Twitchell Management Authority.

Response 6.185

The commenter suggests revising the Sensitive Receptors discussion on page 4.6-4 to clarify the noise-sensitive land uses listed are identified in the current General Plan.

The following revision has been made to Subsection 4.6.1.c, *Sensitive Receptors*, in response to this comment:

The current Santa Maria General Plan Noise Element identifies noise-sensitive land uses as residential areas (including single-family, duplex, multiple-family, and mobile home), motels/hotels, schools, libraries, hospitals, nursing homes, and places of worship (City of Santa Maria 2009), shown in Figure 4.6-1.

Response 6.186

The commenter suggests adding another column to Table 4.6-3 that identifies segments of roadways that have existing sound walls or abutting structures that limit noise levels.

The purpose of Table 4.6-3, Existing Traffic Noise Levels Along Roadway Segments within Subsection 4.6.1.d, *Existing Noise Environment*, is to list the existing traffic noise levels along roadway segments. This table displays the existing noise levels based on average daily trip roadway volume at a distance of 50-feet. The traffic noise levels in Table 4.6-3, as well as the noise contours depicted in Figure 4.6-3, are conservative estimates of existing noise along roadways. Traffic noise levels and

noise contours were determined using average daily traffic and estimated using the Federal Highway Administration Traffic Noise Prediction Model. The Traffic Noise Prediction Model takes into account speed limits, number of lanes, ground type, and vehicle mix. This approach provides a conservative estimate of actual noise levels, which may be attenuated as a result of sound walls, abutting structures, vegetation, or other obstructions to line-of-sight transmission. This approach to evaluating roadway noise levels follows the typical industry practice for General Plan level evaluation, and is appropriate for a programmatic environmental document. No revisions to the Draft EIR are required in response to this comment.

Response 6.187

The commenter suggests updating Figure 4.6-1 to include the Enos Ranch project, Skyview Project, and other projects approved within recent years.

Figure 4.6-1 of the Draft EIR depicts noise sensitive land uses utilizing the City's existing land use map. Though additional noise sensitive land uses have been approved in recent years, this map is meant to be representative of land uses in the city and may not reflect all approved projects in the city. The figure is intended to support City decision-making and should not be read as representing precise, site-specific conditions or all existing noise sensitive land uses. In response to this comment, the following revision has been made to Subsection 4.6.1.c:

The current Santa Maria General Plan Noise Element identifies noise-sensitive land uses as residential areas (including single-family, duplex, multiple-family, and mobile home), motels/hotels, schools, libraries, hospitals, nursing homes, and places of worship (City of Santa Maria 2009), shown in Figure 4.6-1. Note, the figure is intended to support City decision-making and should not be read as representing precise, site-specific conditions or all existing noise sensitive land uses.

Response 6.188

The commenter suggests updating Figure 4.6-2 to include Waller Park, change the water label to vernal pools, and clarify this is the noise contour map adopted by the County Airport Land Use Commission.

Waller Park is not located within the city limits of Santa Maria and therefore is not included. In response to this comment, Figure 4.6-2 has been revised to remove water features.

For additional clarification regarding the source of the airport noise contours shown on Figure 4.6-2, the Aviation discussion in Subsection 4.6.1.d, *Existing Noise Environment*, is revised as follows:

As shown in Figure 4.6-2, the airport 60-65 dBA CNEL noise contours adopted by the Santa Barbara County Airport Land Use Commission extend primarily over areas of the plan area that are primarily agriculture or open space.

Response 6.189

The commenter suggests Figure 4.6-3 be revised to indicate the locations of sound walls and structures that mitigate noise impacts. The commenter suggests contours of 65 dBA and below should not be shown on the map as they do not apply to the area near US 101.

This comment pertains to a figure included within the 2045 General Plan Update. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. Refer

to Response 6.186 for a discussion of the methodology for determining traffic noise levels and noise contours. Also refer to Response 6.35 for a discussion of how noise contours are represented in figures in the General Plan and Draft EIR. While areas of noise contours 65 dBA and below do not apply to areas directly adjacent to U.S. 101, these noise contours are applicable to several roadways throughout Santa Maria. The noise contour map shows generalized noise conditions based on conservative assumptions and may not reflect all local features that may reduce noise levels, such as topography, vegetation, sound walls, or other physical barriers. In some locations, actual noise levels may be lower than those shown. The figure is intended to support City decision-making and should not be read as representing precise, site-specific conditions or all existing noise-reduction infrastructure. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.190

The commenter suggests revising Table 4.6-4 to include the City ordinance that allows exterior noise to be 75 dBA along major corridors. The commenter notes the City is encouraging residential development without perimeter sound walls which would result in higher noise levels for these developments.

Table 4.6-4 is specific to the exterior noise standards established within the current Noise Element of the Santa Maria General Plan. A discussion of noise standards established by the City's Municipal Code is provided in Table 4.6-5. In response to this comment, the following revision has been made to Subsection 4.6.2.c:

Municipal Code Section 5-5.09 requires the acquisition of a construction noise permit from the Noise Control Officer for exterior construction work conducted within a residential zone or within 500 feet of a residential zone only if such activities exceed the noise standards set forth in Municipal Code Sections 5-5.03 and 5-5.05. The permit would cover short-term or occasional, non-routine operations.

Municipal Code Section 12-7.14(a) allows outdoor living areas in R-2 and R-3 multifamily zones to exceed typical noise standards up to "Normally Unacceptable" levels (75 dB or more), provided residents receive a notice warning that the area regularly experiences elevated urban noise from sources such as traffic, trains, aircraft, industry, and general activity.

Municipal Code Section 12-49.09(c) prohibits vibration above the perception threshold of an individual at or beyond the property boundary of the source for more than three minutes in any one hour of the day between the hours of 7:00 a.m. and 10:00 p.m. and for more than 30 seconds in any one hour between the hours of 10:00 p.m. and 7:00 a.m.

Response 6.191

The commenter suggests revising Table 4.6-5 to 65 dBA for daytime exterior noise and 75 dBA for noise along major corridors.

Table 4.6-5 accurately describes the ambient base noise levels identified in Section 5-5.05 of the City's Municipal Code. No revisions to the Draft EIR are required in response to this comment.

Response 6.192

The commenter suggests the Traffic Noise discussion on page 4.6-15 mention electric vehicles and associated traffic noise reduction.

While the State did implement mandates to phase out natural gas vehicle sales, these mandates were blocked by the United States Senate in May 2025. Given the uncertainty of legislation, it is speculative to assume that a ban on the sale of natural gas vehicles would occur. Furthermore, if a ban on the sale of natural gas vehicles occurs, it is likely that natural gas vehicles would continue to be used during a transitory period to electric vehicles. Due to the uncertainty regarding State legislation mandating electric vehicles, the Draft EIR does not consider a reduction in traffic noise occurring from a shift from natural gas vehicle to electric vehicle use, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.193

The commenter suggests the Traffic Noise discussion on page 4.6-15 include a discussion of fairgrounds, sports fields, and high school sporting events near residential areas.

Roadway vehicle noise impacts are evaluated based on average daily trip roadway volume for existing conditions and the amount of growth expected from future development facilitated by the plan, as well as data regarding speeds and number of lanes. The average daily trips and trip distribution data consider periods of time for high traffic and traffic around residential areas. No revisions to the Draft EIR are required in response to this comment.

Response 6.194

The commenter suggests the Mobile Operational Noise discussion and exhibits in Impact NOI-1 are revised to reflect the concept that electric vehicles will occupy an increased number of cars on the roadway over time, thereby reducing traffic noise levels.

Refer to Response 6.192 for a discussion of electric vehicles and impacts to traffic noise levels. No revisions to the Draft EIR are required in response to this comment.

Response 6.195

The commenter suggests revising the Impact NOI-1 discussion to account for electric vehicles occupying an increased proportion of vehicles on the roadway over time, thereby reducing traffic noise levels. The commenter suggest that Impact NOI-1 be revised to include analysis of the 8,000 new units in the annexation areas along with new schools, parks, commercial uses, etc.

Refer to Response 6.192 for a discussion regarding traffic noise associated with electric vehicles.

As discussed in Impact NOI-1, roadway segments located within the annexation area, shown in Figure 4.6-4, were not analyzed as they are not currently within Santa Maria city limits. As the 2045 General Plan does not include specific development proposals, the location of individual development in the annexation area, as well as the potential future traffic volumes of roadway segments located within the annexation area, is speculative. At the time an individual project is proposed within the annexation area, it would be required to undergo individual environmental

review to determine potential noise impacts of the individual project. No revisions to the Draft EIR are required in response to this comment.

Response 6.196

The commenter suggests that Figure 4.6-4 be corrected to adjust contour lines where sound walls and buildings are located that reduce noise generated from traffic on US 101.

Refer to Responses 6.186 for a discussion of the methodology for determining traffic noise levels and noise contours. This comment pertains to a figure included within the 2045 General Plan Update. Comments related to the 2045 General Plan Update will be provided to decision makers for their consideration. The noise contour map shows generalized noise conditions based on conservative assumptions and may not reflect all local features that may reduce noise levels, such as topography, vegetation, sound walls, or other physical barriers. In some locations, actual noise levels may be lower than those shown. The figure is intended to support City decision-making and should not be read as representing precise, site-specific conditions or all existing noise-reduction infrastructure. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required.

Response 6.197

The commenter suggests revising Table 4.6-8 to account for electric vehicles occupying an increased proportion of vehicles on the roadway over time, thereby reducing traffic noise levels.

Refer to Response 6.192 for a discussion regarding traffic noise associated with electric vehicles. No revisions to the Draft EIR are required in response to this comment.

Response 6.198

The commenter suggests Policy N-1.1 and Actions N-1.1.1, N-1.1.2, and N-1.1.3 included on page 4.6-30 be deleted due to their infeasibility.

In response to this comment, Action N-1.1.3 has been deleted from the 2045 General Plan Update and the Final EIR. Editorial edits to Policy N-1.1 and Actions 1.1.1. and N-1.1.2 in the General Plan have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

Response 6.199

The commenter suggests ensuring the City has the provisions of Mitigation Measure NOI-1 reviewed by construction contractors for individual developments.

As stated in Mitigation Measure NOI-1, during future individual developments, the City would include the listed noise reduction measures as conditions of approval, at which time the requirements for individual development will be reviewed by the construction contractor. No revisions to the Draft EIR are required in response to this comment.

Response 6.200

The commenter suggests the Significance After Mitigation discussion within Impact NOI-1 is revised to reflect the concept that electric vehicles will occupy an increased number of cars on the roadway over time, thereby reducing traffic noise levels. The commenter asserts that the plan needs to address noise levels in 25 years rather than current noise levels.

Refer to Response 6.192 for a discussion regarding traffic noise associated with electric vehicles. No revisions to the Draft EIR are required in response to this comment.

Response 6.201

The commenter suggests that the Cumulative Impacts discussion on pages 4.6-35 and 4.6-36 be revised to address noise reductions associated with the electrification of construction equipment and motor vehicles. The commenter states that traffic noise will be reduced compared to current conditions.

Refer to Response 6.192 for a discussion regarding traffic noise associated with electric vehicles. No revisions to the Draft EIR are required in response to this comment.

Response 6.202

The commenter suggests that the City's transportation demand model evaluated by GHD should be included as an appendix and peer reviewed by local traffic engineers. The commenter asks why GHD did not do a VMT analysis. The commenter suggests that a map showing the locations of infill projects presumed to have a less than significant impact related to VMT are added to Section 4.7, Transportation and Traffic.

The methodology for determining VMT impacts in the Draft EIR is discussed in Subsection 4.7.3.a, *Methodology and Significance Thresholds*. This methodology relied on the City of Santa Maria travel demand model which includes a current baseline scenario and a 2045 future scenario to forecast traffic conditions on major roadways in the city and the Santa Maria Valley. This trip-based model estimates residential VMT per household and VMT per employee based on home-based trip activity to and from residences and workplaces within Santa Maria and the annexation area.

A standalone transportation report for the VMT analysis was not prepared as part of the project; instead, Subsection 4.7.3.b, includes a summary of VMT model methodology, supporting data, and outputs. No revisions to the Draft EIR are required in response to this comment.

Response 6.203

The commenter suggests revising the Roadway Network and Functional Classifications discussion on page 4.7-1 to include truck hauling routes and industrial hauling routes as uses for roadways in Santa Maria.

In response to this comment, the following revision has been made to Subsection 4.7.1.a, *Roadway Network and Functional Classifications*, of the Final EIR:

Santa Maria is served by a system of streets and paths that enable connections in the city and to the regional transportation system. They are classified by their function with different characteristics and accommodations for modes of travel and access to adjacent land uses. The system supports multiple modes of travel and contains network elements that support

vehicular, bicycle, pedestrian, and transit travel. In addition, roadways in Santa Maria provide routes for truck hauling and industrial uses hauling. The roadway classifications serve as the City's policy guidance for the development of multi-modal streets and balance all network elements.

Response 6.204

The commenter suggests ensuring the accuracy of the description of Betteravia Road on page 4.7-2.

The description of Betteravia Road in Subsection 4.7.1.b is accurate. As described on page 16 of the Transportation and Mobility Existing Conditions Report prepared in December 2020 by the City of Santa Maria, the portion of Betteravia Road from U.S. 101 to SR 135 is designated in the National Highway System.

Response 6.205

The commenter suggests revising Table 4.7-1 to include road right-of-way widths, add a definition for public alleyways, add a definition for private roads and driveways for small lots. The commenter suggests including information on complete street standards as they relate to width and design of road segments, where complete street standards apply, and inclusion of a cross-section of a complete street.

Table 4.7-1, Current Circulation Element Roadway Classification in Subsection 4.7.1.c, *Arterials, Collectors, and Local Roadways*, is based on information from the City's 2011 Circulation Element and includes the appropriate information to support the Traffic and Transportation environmental setting section of the Draft EIR. Additional definitions would not alter the conclusions or otherwise contribute substantively to the environmental analysis in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.206

The commenter suggests the Active Transportation Plan should be included as an appendix to the EIR.

The City's Active Transportation Plan is available on the City's website for review. The Draft EIR discusses the 2045 General Plan Update's consistency with the Active Transportation Plan but does not rely on the Active Transportation Plan to reach any conclusions regarding the environmental impacts of the 2045 General Plan Update. Therefore, this plan is not included as an appendix to the EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.207

The commenter suggests revising Figure 4.14-1 to include the connection to U.S. 101 and Union Valley Parkway and the extension of Seaward Drive to U.S. 101.

Figure 4.14-1 is derived from the General Plan Environmental Existing Conditions Report, prepared by the City of Santa Maria in 2020. The General Plan Environmental Existing Conditions Report represents the most recent available information regarding roadway classifications in Santa Maria. Referencing the adopted roadway classifications directly ensures consistency with official documents and avoids duplicating material that is already clearly defined and accessible in the city's

transportation planning framework. No revisions to the Draft EIR are required in response to this comment.

Response 6.208

The commenter suggests revising Figure 4.14-1 to revise the location of Bradley Road, include the road pattern for the Blosser Ranch Specific Plan, include the roads for Area 9 and Area 7 part of the Circulation Element, and identify all Measure A projects already funded.

Refer to Response 6.207 for a discussion of Figure 4.14-1 and its source material.

Response 6.209

The commenter suggests the Existing and Planned Bikeways discussion on page 4.7-5 include standards and widths for Class I-IV bikeways.

The City utilizes Caltrans standards for the widths of Class I trails, Class II bicycle lanes, and Class IV separated bikeways. Standards for Class III bicycle routes are incorporated into roadway width standards. In response to this comment, the following revisions have been made to the Existing and Planned Bikeways discussion in Subsection 4.7.1.d, *Pedestrian and Bicycle Network*:

- Class I Shared Use Paths. Class I shared use paths are completely separated rights-of-way designated for the exclusive use of bicycles and pedestrians, with crossflows by motorists minimized. Caltrans standards require a minimum width of eight feet for a one-way Class I bike path.
- Class II Bicycle Lanes. Class II bicycle lanes provide a striped or buffered right-of-way designated for the exclusive or semi-exclusive use of bicycles with through-travel by motor vehicles or pedestrians prohibited, but with vehicle parking and crossflows by pedestrians and motorists. Caltrans standards generally require a minimum width of four feet for a Class II bicycle lane.
- Class III Bicycle Routes. Class III bicycle routes are signed routes for bicyclists on low-speed, low-volume streets where lanes are shared with drivers. Caltrans standards for Class III bicycle routes are incorporated into roadway width requirements.
- Class IV Separated Bikeways. Class IV separated bikeways are on-street bicycle facilities with a physical barrier between the bicycle space and motor vehicle lanes, including bollards, curbs, or parking. Caltrans standards require a minimum width of five feet for a one-way Class IV separated bikeway.

Response 6.210

The commenter suggests revising the Santa Maria Regional Transit discussion on page 4.7-5 to include a table of ridership over the last 10-20 years to prove ridership has been increasing.

The Santa Maria Regional Transit discussion states that transit ridership is rapidly growing. In response to this comment, the text in Subsection 4.7.1.e, *Transit*, has been revised to include a source for this statement:

- **Santa Maria Regional Transit (SMRT).** The City of Santa Maria operates SMRT's local fixed route, regional bus service, and on-demand Microtransit and ADA paratransit bus services. SMRT ridership demographics reflect a broad cross-section of the service area, including seniors, persons with disabilities, K-12 students, college students, working professionals,

tourists and riders who choose to use transit instead of driving. Transit ridership is rapidly growing and is expected to continue to grow over the years to come (City of Santa Maria 2025).

In addition, the following resource has been added to the Transportation references in Section 7.1, *Bibliography*:

Santa Maria, City of. 2020. General Plan Environmental Existing Conditions Report. Accessed June 2025.

. 2025. SMRT Announces Route Adjustments in Response to Growing Ridership. <https://www.cityofsantamaria.org/Home/Components/News/News/17738/> (accessed December 2025).

Response 6.211

The commenter suggests adding descriptions of the following transit services to the bulleted list on page 4.7-6: SMOOTH, Dial a Ride, and senior and medical transits provided by Marian and other medical services.

Medical transit provided by Marian relates to ambulance travel, which does not pertain to transit services such as buses and is therefore not discussed herein. In response to this comment, the following addition has been made in Subsection 4.7.1.e, *Transit*:

- **SMOOTH.** SMOOTH maintains and operates various contracts with local groups in Santa Barbara County to provide transportation assistance with emphasis for passengers requiring medical, physical, and social assistance. SMOOTH provides Senior Dial-A-Ride services in Santa Maria.

Response 6.212

The commenter suggests the AB 32 and SB 375 discussion on page 4.7-6 be revised to specify 1990 emissions levels, 2020 emissions levels, and discuss whether statewide emissions targets were met in 2020.

Refer to Response 6.70 for a discussion regarding greenhouse gas emissions levels. No revisions to the Draft EIR are required in response to this comment.

Response 6.213

The commenter states that the EIR needs to include the Santa Maria Active Transportation Plan and asks if this plan includes the annexation areas and suggests that the plan may need to be updated if not.

Diagrams of the existing street network, bikeway network, and pedestrian network are included in the Circulation Element of the 2045 General Plan Update. The Active Transportation Plan does not include the annexation areas, as the plan was adopted in January 2021, prior to preparation of the 2045 General Plan Update. Updating the Active Transportation Plan is outside of the scope of the Draft EIR and does not pertain to the environmental analysis of the 2045 General Plan Update. No revisions to the Draft EIR are required in response to this comment.

Response 6.214

The commenter states maps from the Santa Maria Regional Transit Short Range Transit Plan Update should be included in the EIR and asks if this plan includes the annexation areas and suggests that the plan may need to be updated if not.

The Short Range Transit Plan Update does not include the annexation areas, as this plan was updated in 2021, prior to preparation of the 2045 General Plan Update. The Short Range Transit Plan Update includes figures regarding the transit system which are available for review in the Short Range Transit Plan Update. Updating the Short Range Transit Plan is outside of the scope of the Draft EIR and does not pertain to the environmental analysis of the 2045 General Plan Update. No revisions to the Draft EIR are required in response to this comment.

Response 6.215

The commenter suggests the Methodology discussion on page 4.7-8 include a map and table showing existing and proposed traffic in Santa Maria in 2045 along with level of service. The commenter acknowledges EIRs do not have to include level of service information. The commenter expresses concern for the future circulation with increased traffic and decreased level of service. The commenter requests a map in the EIR is included which shows circulation for 2045-2050. The commenter states the EIR and 2045 General Plan Update are not consistent with each other in regard to how they discuss LOS.

Refer to Response 6.6 for a discussion of LOS analysis in the Draft EIR. Consistent with CEQA Guidelines Section 15046.3, VMT has replaced LOS as the metric for determining transportation impacts under CEQA. Accordingly, a discussion of future traffic and LOS is neither necessary nor appropriate to include the Draft EIR. A discussion of LOS in the city can be found in the General Plan Circulation Element under the “Traffic Level of Service” heading. A map of the existing circulation system is provided in the General Plan as Figure 4.7-1, Current Circulation Element Roadway Functional Classification. No revisions to the Draft EIR are required in response to this comment.

Response 6.216

The commenter suggests Impact TRA-1 needs to include the Travel Demand Model and requests additional information regarding future transportation studies, specifically whether GHD would be required to complete all future transportation studies.

The Santa Maria Travel Demand Model is a trip-based model used in the evaluation of VMT and is discussed in Impact TRA-2 of the Draft EIR. The model is available by request to the City of Santa Maria and does not require future transportation studies to only be carried out by GHD. Refer to Response 6.202 for a discussion of the Travel Demand Model and the methodology for determining VMT impacts in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.217

The commenter suggests deleting Policy CIR-1.2 from Impact TRA-1, as privately maintained streets and driveways would not be designed to meet complete street requirements. The commenter requests the Street Network, Bikeway Network, and Pedestrian Priority Improvement Network diagrams be included in the EIR.

Policy CIR-1.2 was not deleted from the 2045 General Plan Update but editorial revisions to the policy have been incorporated into the 2045 General Plan Update and carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR. Diagrams of the street network, bikeway network, and pedestrian priority improvement network are included in the Circulation Element of the 2045 General Plan Update. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.218

The commenter suggests changes to the following polices and actions listed in Impact TRA-1:

- *Delete the reference to private streets in Policy CIR-1.3.*
- *Add a sentence in Action CIR-2.2.2 that states AB1600 traffic fees will be used as matching fund for future grants or funding programs.*
- *Delete Policy CIR-6.1.*
- *Delete the second bullet in Action CIR-6.4.3 as it is inconsistent with the Noise Element and EIR noise section. Delete the last two bullets as they are inconsistent with other policies. The last bullet is inconsistent with adopted Objective Design Standards.*
- *Revise Policy CIR-7.2 to state infill and annexations areas will prioritize mixed-use development.*

Policy CIR-1.3 and Policy CIR-7.2 have been revised in the 2045 General Plan Update and changes have been carried over into the Final EIR, as appropriate. Action CIR-2.2.2, Policy CIR-6.1, and Action CIR-6.4.3 have not been revised in the 2045 General Plan Update. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no other changes to the Draft EIR are required in response.

Response 6.219

The commenter suggests the Bikeway Network, Pedestrian Priority Improvement Network diagrams, and Santa Maria Active Transportation Plan maps referenced in 2045 General Plan policies be included in the EIR.

Diagrams of the street network, bikeway network, and pedestrian priority improvement network are included in the Circulation Element of the 2045 General Plan Update. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.220

The commenter asks if mitigation to Impact TRA-1 needs to be included to address road improvements that will be needed as a result of traffic increases over the next 25 years.

Because the 2045 General Plan Update does not include specific development plans, the Draft EIR does not evaluate the potential environmental impacts of specific roadway improvements, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a

lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.221

The commenter asks why new development projects have to reduce VMT to 24.2 and 32.8 percent based on Table 4.7-4. The commenter states this is infeasible and the law only requires a 17 percent reduction. The commenter asks what AB 130 would do for VMT requirements.

Table 4.7-4 does not show mandatory VMT reductions; rather, this table shows projected per-unit VMT decreases from residential and non-residential developments from future development only (i.e., development facilitated by the 2045 General Plan Update).

AB 130 would not change the threshold of significance for VMT impacts pursuant to CEQA. Rather, AB 130 provides a means of mitigating VMT impacts from future projects through contribution to a state Transit-Oriented Development Implementation Fund. No revisions to the Draft EIR are required in response to this comment.

Response 6.222

The commenter suggests noting on page 4.7-15 that Policy CIR-7.1 and Action CIR-7.1.1 will not pertain to most infill housing projects, which the commenter states would be exempt from environmental review. The commenter suggests revising Policy CIR-7.2 consistent with the comment on 6.218.

In response to this comment, Policy CIR-7.1 has been revised in the 2045 General Plan Update and changes have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

Response 6.223

The commenter states that page 4.7-14 is inconsistent with the statement on 4.7-15 which states the City would be inconsistent with CARB standards.

Impact TRA-2 states that future development alone would meet CARB's VMT reduction target, but concludes that future development combined with existing development (i.e., combined Future conditions forecast) would not meet the CARB reduction target. No revisions to the Draft EIR are required in response to this comment.

Response 6.224

The commenter asks for clarification if VMT is considered a significant and unavoidable impact, if every future non-residential project would require an EIR.

As described in Impact TRA-2, potential future VMT impacts from individual developments in Santa Maria would be evaluated based on local VMT thresholds established by the City. Future non-residential projects would not by default be required to prepare an EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.225

The commenter suggests removing the reference to private streets in Policy CIR-1.3 on page 4.7-16.

This comment pertains to policy language included in the 2045 General Plan Update that does not pertain to the environmental analysis in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.226

The commenter states they have the same comments as above on Policy CIR-1.4 and Actions CIR-1.4.1 and CIR-1.4.2 on page 4.7-17.

This comment pertains to policy language included in the 2045 General Plan Update that does not pertain to the environmental analysis in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.227

The commenter suggests Policy CIR-1.9 should be separated into two policies covering level of service and bicyclists separately. The commenter states there is no need for deficiency plans as most intersections will be significantly impacted in the future.

In response to this comment, revisions to Policy CIR-1.9, CIR-1.10, and CIR-1.11 have been made in the 2045 General Plan Update to separate LOS and bicycle level of stress and changes have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

Response 6.228

The commenter suggests that infill development will result in significant traffic impacts that need to be addressed in the EIR, including a map that shows future roadways and intersections which will exceed level of service standards.

Refer to Response 6.6 for a discussion of LOS analysis in the Draft EIR. Consistent with CEQA Guidelines Section 15046.3, VMT has replaced LOS as the metric for determining transportation impacts under CEQA. Accordingly, LOS is not evaluated as a potential environmental impact in the Draft EIR. A map of the existing circulation system is also provided in the General Plan as Figure 4.7-1, Current Circulation Element Roadway Functional Classification. No revisions to the Draft EIR are required in response to this comment.

Response 6.229

The commenter asks if the second paragraph of the Cumulative Impacts discussion on page 4.7-18 means the City will accept level of service deficiencies throughout Santa Maria at full buildout. The

commenter asks for clarification on the third paragraph of the Cumulative Impacts discussion related to exemptions from CEQA for housing projects.

The paragraph referenced by the commenter explains that the cumulative impacts analysis considers all development anticipated under the General Plan and confirms that such development would be required to comply with local regulations and policies, including those in the Circulation Element. These policies govern how the circulation system, including roads, transit, bicycle, and pedestrian facilities, will function as growth occurs. The conclusion is that cumulative projects would not conflict with applicable plans or policies, resulting in a less-than-significant impact. The Draft EIR does not establish or modify LOS standards.

Refer to Response 6.8 for a discussion of future individual projects requiring separate environmental review. No revisions to the Draft EIR are required in response to this comment.

Response 6.230

The commenter suggests adding to the Water Supply and Demand discussion on page 4.8-1 that the adjudication agreement included return flows from the wastewater treatment plant for percolation ponds. The commenter also suggests adding information that the City has been successful in reducing water consumption per capita and water use in agricultural operations.

Per capita water consumption is discussed in Impact UTIL-2 of the Draft EIR. Specifics regarding water types that are allocated to the City as result of the Santa Maria Groundwater Adjudication are not included in the evaluation of per capita water consumption as they do not have an influence on the environmental conclusions related to water supply in Impact UTIL-2. Impact UTIL-2 provides an analysis of the total amount of projected water supply and demand in the city. No revisions to the Draft EIR are required in response to this comment.

Response 6.231

The commenter suggests reformatting Table 4.8-1 to put the table on one full page. The commenter asks if the table and Annexation Study Technical Memorandum prepared by WSC qualify as a Water Supply Assessment per state law.

The comment pertaining to reformatting Table 4.8-1 focuses on editorial edits that do not pertain to the environmental analysis in the Draft EIR. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

The Annexation Study Technical Memorandum prepared by WSC would not qualify as a Water Supply Assessment. A Water Supply Assessment would be required for a project-level development meeting any the definitions of project provided in California Water Code Section 10912(a). No revisions to the Draft EIR are required in response to this comment.

Response 6.232

The commenter suggests the Sewer Collection and Wastewater Treatment discussion on page 4.8-3 should include the current flow to the wastewater treatment plant, and an estimate of the capacity of the plant at full buildout of the 2045 General Plan Update. The commenter asks if there will be a need for upgrades to the wastewater treatment plant or development of a new plant, and if there will need to be upgrades to wastewater pipelines.

Future wastewater generation is discussed in Impact UTIL-1 of the Draft EIR. Because the 2045 General Plan Update does not include specific development plans, the Draft EIR does not evaluate the potential environmental impacts of specific sewer pipeline upgrades, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.233

The commenter suggests the Stormwater Facilities discussion on page 4.8-4 should include information on the A Street basin and the North Blosser basins. The commenter provides information on the Blosser Channel and Blosser Basin. The commenter states that information should be added on the Green Canyon watershed and stormwater improvements constructed through the southern portions of Santa Maria. The commenter provides information on these improvements.

Subsection 4.8.1.c, *Stormwater Facilities* is based on information from the City's 2020 Urban Water Management Plan, 2009 Sewer System Master Plan, 2005 Storm Water Management Plan, 2020 Infrastructure Existing Conditions Report, and city input as these are readily available resources, and provide sufficient baseline data to support Subsection 4.8.1.c, *Stormwater Facilities*. Additional information regarding stormwater projects intended to reduce stormwater runoff would not further the environmental analysis in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.234

The commenter suggests that the Solid Waste discussion on page 4.8-5 should include information on the Los Flores Landfill, information on what occurs when the existing landfill is closed, a discussion of food organic waste, hazardous waste collection, and justification for the use of Cold Canyon Landfill.

Subsection 4.8.1.d, *Solid Waste*, states that the Santa Maria Regional Landfill is expected to remain operational through 2034, and that after operation of the Santa Maria Regional Landfill ends, the City may divert waste to nearby facilities such as the Cold Canyon Landfill, which has sufficient capacity and is anticipated to operate through 2040. Because the 2045 General Plan Update does not include future development plans for the Los Flores landfill mentioned by the commenter, the Draft EIR does not evaluate the potential environmental impacts of such development, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.

Organic waste reduction requirements are described in the California Senate Bill 1383 discussion in Subsection 4.8.2.b, *State Regulations*, of the Draft EIR. Hazardous waste disposal is described in the Chapter 8-11 discussion in Subsection 4.8.2.c, *Local Regulations*, of the Draft EIR and in Subsection 4.9.4, *Hazards and Hazardous Materials*, of the Draft EIR.

No revisions to the Draft EIR are required in response to this comment.

Response 6.235

The commenter suggests revising the Water discussion in Impact UTIL-1 to state that the City has installed a water line from water tanks east of Santa Maria to Panther Drive that will serve the annexation area.

Subsection 4.8.3.b, *Project Impacts and Mitigation Measures*, discusses existing infrastructure supporting the annexation area, and concludes that the existing infrastructure may not be adequate to support the level of development that would be facilitated by the 2045 General Plan Update. As development in the annexation area occurs, the City would be required to review existing infrastructure and determine whether additional improvements are necessary to ensure adequate service. No revisions to the Draft EIR are required in response to this comment.

Response 6.236

The commenter suggests revising the Wastewater discussion in Impact UTIL-1 to clarify the calculations of wastewater generation and the locations of wastewater pipelines that would convey effluent from the east to the existing plant and the sizing of these pipelines.

As stated in Impact UTIL-1, the 2045 General Plan would facilitate development which, at full buildout, would result in a wastewater generation of 11.4 million gallons per day based on a generation factor of 68 gallons per day as stated in the City's 2020 UWMP. The wastewater treatment plant has a capacity of 13.5 million gallons per day.

Because the 2045 General Plan Update does not include future development plans, the Draft EIR does not evaluate the potential environmental impacts of specific wastewater treatment pipeline improvements, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.237

The commenter suggests revising the Stormwater discussion in Impact UTIL-1 to include information on how stormwater conveyance will be handled on the east side of the freeway. The commenter suggests regional drainage cannot be deferred to future projects.

Drainage patterns are discussed in the Impact HYD-3 discussion of the Draft EIR. As described therein, runoff would be regulated under the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small General Municipal Separate Storm Sewer Systems (Phase II MS4 Permit) and the Industrial General Permit. Individual developments that create or replace greater than or equal to 2,500 square feet of impervious surface would be required to implement BMPs and submit a Stormwater Control Plan listing applicable BMPs to the City for review and approval.

Because the 2045 General Plan Update does not include specific development plans, the Draft EIR does not evaluate the potential environmental impacts of drainage changes of such development, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.238

The commenter suggests revising the goals and policies listed on page 4.8-16 in accordance with previous comments.

This comment pertains to policy language included in the 2045 General Plan Update that does not pertain to the environmental analysis in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.239

The commenter suggests that Impact UTIL-1 should include information regarding overall regional infill drainage and drainage in the annexation area. The commenter asks how drainage from the annexation area will be conveyed to the river.

Refer to Response 6.237 for a discussion regarding stormwater conveyance. No revisions to the Draft EIR are required in response to this comment.

Response 6.240

The commenter suggests that Impact UTIL-2 should include information from the 2024 Annual Report of the Santa Maria Valley Basin Management Plan, specifically page 38-39 of that plan, which includes a discussion of projected water use by 2040 of 18,700 acre-feet

The 2024 Annual Report of Hydrogeologic Conditions, Water Requirements, Supplies and Disposition uses the 2020 UWMP and describes projected 2045 water use in the city as approximately 18,700 acre-feet. Pages 38-39 of the 2024 Annual Report of Hydrogeologic Conditions, Water Requirements, Supplies and Disposition refers specifically to intra-basin water transfers related to the Santa Maria Groundwater Basin, and discusses supply and demand of the basin. The Draft EIR discusses city water demand and supply from all applicable water sources. As such, relevant and applicable information from the 2024 Annual Report of Hydrogeologic Conditions, Water Requirements, Supplies and Disposition has been incorporated into the Draft EIR.

The estimated 2045 water use of approximately 18,700 acre-feet is shown in Table 4.8-1 in the rows showing 2045 demand totals. No revisions to the Draft EIR are required in response to this comment.

Response 6.241

The commenter states that the 2024 Annual Report of the Santa Maria Valley Basin Management Plan includes a discussion of projected water use for Santa Maria by 2040.

Refer to Response 6.240 for a discussion of the Santa Maria Valley Basin Management Plan. No revisions to the Draft EIR are required in response to this comment.

Response 6.242

The commenter asks for additional information on the City's Water Shortage Contingency Plan, including its adoption date and how often it is updated.

The City's Water Shortage Contingency Plan provides guidance to prepare and respond to water shortages in Santa Maria. The Water Shortage Contingency Plan is included as Appendix H of the City's 2020 UWMP. The City first adopted its 2005 Water Shortage Contingency Plan in 2007 and made subsequent updates in 2011 and 2021.

This comment does not pertain to the environmental analysis in the Draft EIR or recommend additional information or analysis be added to the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.243

The commenter states that a 20 percent reduction in residential indoor water use, referenced on page 4.8-19, would result in water use to be 85 gallons per day per capita.

The City relies on a water demand factor of 118 gallons per capita per day, as stated in the City's 2020 UWMP, as a basis for projecting water demand in Santa Maria. This demand factor accounts for existing water reduction measures, including those included in the California Green Building Standards Code. The 20 percent reduction in residential indoor water use that the commenter refers to has been enforced by the California Green Building Standards Code starting in 2016. As such, residential indoor water use would continue to be reduced by 20 percent and would not further reduce residential water use to the commenter's estimated 85 gallons per capita per day. No revisions to the Draft EIR are required in response to this comment.

Response 6.244

The commenter states the last paragraph of Impact UTIL-2 should reference the 2024 Basin Management Plan and note the total water use for Santa Maria is estimated at 18,700 acre-feet.

Refer to Response 6.240 for a discussion of the Santa Maria Valley Basin Management Plan. No revisions to the Draft EIR are required in response to this comment.

Response 6.245

The commenter states that Impact UTIL-3 should clarify if the use of Cold Canyon landfill is temporary and if Los Flores landfill would be built.

As described in Impact UTIL-3, the Santa Maria Regional Landfill is expected to remain operational through 2034. After operation of the Santa Maria Regional Landfill ends, the City may divert waste to nearby facilities such as the Cold Canyon Landfill, which has sufficient capacity and is anticipated to operate through 2040. Because the 2045 General Plan Update does not include future development plans for the Los Flores landfill mentioned by the commenter, the Draft EIR does not evaluate the potential environmental impacts of such development, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.246

The commenter states that the Cumulative Impacts discussion on page 4.8-21 needs to describe existing water use and projected water use at 2045 total buildout. The commenter asks if the City has determined what water lines need to be upgraded to serve buildout.

Existing water use is estimated in Table 4.8-1 in Subsection 4.8.1.a, *Water Supply and Demand*, of the Draft EIR. Projected water use at full buildout on 2045 is provided in Impact UTIL-2.

Because the 2045 General Plan Update does not include future development plans, the Draft EIR does not specify water lines that may need upgrades to serve future development, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.247

The commenter states that the Cumulative Impacts discussion on page 4.8-21 needs to account for up to 15 million gallons per day of wastewater effluent generation at full buildout. The commenter asks for clarification of how wastewater demand was calculated and which pipelines would be needed to serve development east of the freeway.

As stated in Impact UTIL-1, the 2045 General Plan would facilitate development which, at full buildout, would result in 11.4 million gallons of wastewater per day based on a generation factor of 68 gallons per day in the City's 2020 UWMP. The wastewater treatment plant has a capacity of 13.5 million gallons per day.

Because the 2045 General Plan Update does not include future development plans, the Draft EIR does not evaluate the potential environmental impacts of specific wastewater treatment pipeline improvements, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.248

The commenter states that the Cumulative Impacts discussion on page 4.8-22 needs to clarify where future solid waste will be hauled and if the Los Flores landfill will be constructed.

Refer to Response 6.245 for a discussion of future solid waste. No revisions to the Draft EIR are required in response to this comment.

Response 6.249

The commenter suggests revising the Aesthetics discussion on page 4.9-1 as there is no view of the Santa Maria River except from U.S. 101 bridge or levee trail north of Santa Maria. The commenter suggests adding the names of ridges, rolling hills, and mountains to the east, and noting the locations of the Solomon Hills and Casmalia Hills.

As shown in Figure 2-2, Santa Maria city limits contain portions of land abutting the Santa Maria River where the river and its foothills are visible. No revisions to the Draft EIR are required in response to this comment.

The comment pertaining to adding names of landscape features focuses on editorial edits that do not pertain to the environmental analysis in the Draft EIR nor would it change the analysis in the Draft EIR. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

Response 6.250

The commenter suggests revising the second paragraph of the Aesthetics discussion on page 4.9-1 to include information on Objective Design Standards.

In response to this comment, the following revision has been made to Subsection 4.9.1, *Aesthetics*:

The City has regulations for exterior lighting for commercial development, mixed-use development, Objective Design Standards for residential development, as well as specific standards for parking lots, signs, and for development within Airport Safety Zones (Chapters 12-33, 12-49, 12-32, 12-34, 12-21 and 12-24 of the Zoning Ordinance).

Response 6.251

The commenter suggests adding Objective Design Standards to the third paragraph of the Aesthetics discussion on page 4.9-1.

Refer to Response 6.251 for a discussion of Objective Design Standards. As described therein, a reference to Objective Design Standards has been added to Subsection 4.9.1, *Aesthetics*, of the Final EIR.

Response 6.252

The commenter suggests deleting the first paragraph on page 4.9-2 as it is repetitive of previous information in the Aesthetics discussion on page 4.9-1.

This comment focuses on editorial edits that do not pertain to the environmental analysis in the Draft EIR nor would it change the analysis in the Draft EIR. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

Response 6.253

The commenter suggests revisions to Policy REC-8.1 on page 4.9-2 as there is no publicly owned and designated open space in Santa Maria.

This comment pertains to policy language included in the 2045 General Plan Update that does not pertain to the environmental analysis in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Response 6.254

The commenter suggests adding Executive Order N-79-20 described in the Energy discussion on page 4.9-2 in the Air Quality and Greenhouse Gas chapter of the EIR.

Executive Order N-79-20 directs California to end the sale of new gasoline-powered passenger vehicles by 2035 and transition the state's transportation sector toward zero-emission electric vehicles. While the State did implement mandates to phase out natural gas vehicle sales, these mandates were blocked by the United States Senate in May 2025. Given the uncertainty of legislation, it is speculative to assume that a ban on the sale of natural gas vehicles would occur. Furthermore, if a ban on the sale of natural gas vehicles occurs, it is likely that natural gas vehicles would continue to be used during a transitory period to electric vehicles. Due to the uncertainty regarding State legislation mandating electric vehicles, the Draft EIR does not consider a reduction in energy use occurring from a shift from natural gas vehicle use to electric vehicle use, as such an evaluation would be speculative at this time. Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. No revisions to the Draft EIR are required in response to this comment.

Response 6.255

The commenter suggests that the Operational Impacts discussion on page 4.9-3 should list all of the counties that 3CE serves.

In response to this comment, the following revision has been made to the Operational Impacts discussion in Subsection 4.9.2, *Energy*:

The City of Santa Maria is currently enrolled in the Central Coast Community Energy Program (3CE) which strives to source clean and renewable electricity at responsible rates for customers along the central coast of California within the 3CE service area which includes the counties of Santa Cruz, San Benito, Monterey, San Luis Obispo, and Santa Barbara.

Response 6.256

The commenter asks for clarification on Action S-1.1.4 on Page 4.9-5 related to the number of buildings constructed with unreinforced masonry.

This comment addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.257

The commenter suggests deleting Action S-1.2.1 as this is already in the Building Code and zoning ordinance.

This comment addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not

identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.258

The commenter suggests deleting Action S-1.3.1 as this is already required by the building code.

This comment addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.259

The commenter suggests revising the Landslides discussion on Page 4.9-7 to clarify the escarpment is not subject to landscapes in Santa Maria or the annexation area.

As stated in Subsection 4.9.3, *Geology and Soils*, there is no proposed development or land use changes that would occur in the area of Santa Maria that contains the escarpment. No revisions to the Draft EIR are required in response to this comment.

Response 6.260

The commenter suggests revising the first paragraph of Page 4.9-8 to indicate areas of expansive soil are known to be unlikely within city limits.

Given that the majority of the City of Santa Maria is considered unlikely to contain expansive soils, as shown in Figure S-3 of the Draft 2045 General Plan, the following language has been added to Subsection 4.9.3, *Geology and Soils*:

Areas of expansive soils are known to exist in city limits; however, the majority of Santa Maria is considered unlikely to contain expansive soils (Safety Element of the 2045 Santa Maria General Plan Figure SE-3).

Response 6.261

The commenter suggests revising the Paleontological Resources discussion on Page 4.9-8 to state there have been few paleontological resources found in Santa Maria, and the Santa Maria Valley has been historically flooded and the Orcutt area consists of historic sand dunes.

The commenter's suggested additions do not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures. No revisions to the Draft EIR are required in response to this comment.

Response 6.262

The commenter states there is no mention of Allan Hancock College and new school sites in Santa Maria in the Schools discussion on Page 4.9-11.

As discussed in Response 6.8, the Draft EIR provides a program-level analysis consistent with CEQA Guidelines 15168 for long-range planning documents and does not require site-specific planning or design details. The 2045 General Plan Update does not include specific proposals for the development of school facilities, including Allan Hancock College, and it is not possible to know project specific details at this time regarding potential improvements at school facilities or future new school facilities. Because the 2045 General Plan Update does not include future development plans for specific developments projects, the Draft EIR does not evaluate the potential environmental impacts of future potential development at a project level of detail, as such an evaluation would be speculative at this time.

In response to the commenter's statement regarding Allan Hancock College, the following revision has been made to the Schools discussion in Subsection 4.9.8, *Public Services and Recreation*:

There are 23 schools within city limits, including elementary, junior high and high schools, and Allan Hancock College.

Response 6.263

The commenter suggests including a map of existing and new school sites from US 101 and truck routes in the Schools discussion on Page 4.9-11. The commenter asks if schools need to be 0.25-mile from truck routes.

As discussed in Response 6.8, the Draft EIR provides a program-level analysis consistent with CEQA Guidelines 15168 for long-range planning documents and does not require site-specific planning or design details. The proposed project does not include specific proposals for the development of school facilities and it is not possible to know project specific details at this time regarding potential improvements at school facilities or future new school facilities. Because the 2045 General Plan Update does not include future development plans for specific developments projects, the Draft EIR does not evaluate the potential environmental impacts of future potential development at a project level of detail, as such an evaluation would be speculative at this time. No revisions to the Draft EIR are required in response to this comment.

Response 6.264

The commenter suggests revising the Hazardous Materials Sites discussion on Page 4.9-11 to include a map that locates the 90 active hazardous materials sites in Santa Maria. The commenter asks if this number includes active and historic oil wells.

Subsection 4.9.4, *Hazards and Hazardous Materials*, describes the approximately 90 active hazardous materials sites identified on the DTSC EnviroStor and SWRCB GeoTracker databases. These do not include all active and historic wells in Santa Maria as not all well sites have posed a potential hazard.

The Draft EIR provides a program-level analysis consistent with CEQA Guidelines 15168 for long-range planning documents and does not include specific development proposals as part of the proposed project. Proximity to hazardous materials sites would be evaluated on a case-by-case basis as part of City review for individual development projects. Accordingly, a map of hazardous materials sites throughout Santa Maria is not included in the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Response 6.265

The commenter suggests the policies and actions on Page 4.9-12 should remove references to the City Petroleum Engineer and should refer to new state law regarding setback for new oil development. The commenter suggests deleting either Action S-4.1.3 or S-4.1.6 due to repetitive information.

Action S-4.1.6 has been revised in the 2045 General Plan Update and changes have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR. This comment addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.266

The commenter asks clarification on Action S-4.2.5 on Page 4.9-11 regarding if the City issues permits for railroad operations or if railroad operations are exempt from City permits.

Railroad operations and facilities permitting falls under the jurisdiction of the California Public Utilities Commission; the City does not issue permits for railroad operations. In response to this comment, Action S-4.2.5 has been deleted from the 2045 General Plan Update and changes have been carried over into the Final EIR, as appropriate. The revisions incorporated into the Final EIR do not otherwise change the environmental analysis or conclusions in the Final EIR.

Response 6.267

The commenter suggests a page break between two action items is needed on Page 4.9-15.

This comment focuses on editorial edits that do not pertain to the analysis presented in the Draft EIR, nor would it change the analysis in the Draft EIR. Refer to Response 6.9 for a discussion of comments, recommendations, and requests that are editorial in nature and do not pertain to the adequacy of the Draft EIR or alter the environmental impact analysis.

Response 6.268

The commenter states there is no land in Santa Maria zoned for agriculture. The commenter suggests revising the first paragraph of the Land Use and Planning discussion on Page 4.9-18 to clarify the number of infill units and units in the annexation area.

The commenter correctly notes that there is no land in Santa Maria zoned for agriculture. Specifics on the proposed 2045 General Plan Update buildout is discussed in Section 2.6.5, *Proposed 2045 General Plan Buildout*. No revisions to the Draft EIR are required in response to this comment.

Response 6.269

The commenter suggests revising the last sentence of the second paragraph of the Land Use and Planning Discussion on Page 4.9-18 to clarify that all neighborhoods can potentially have infill units.

In response to this comment, the following change has been made to the Land Use and Planning Discussion in Subsection 4.9.5, *Land Use and Planning*:

~~By easing new development away from established neighborhoods and~~ ensuring compatibility between new development and existing facilities through thoughtful land use planning, the policies help prevent community division and reduce the potential for significant environmental impacts.

Response 6.270

The commenter suggests deleting Action LU-1.1.2 on Page 4.9-19 as the Objective Design Standards have been adopted.

This comment addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.271

The commenter suggests revisions to Policies LU-1.2, LU-1.3, and LU-1.5 on Page 4.9-19. The commenter asks information on the current jobs-housing balance in Santa Maria.

This comment primarily addresses policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.272

The commenter suggests including a mention of mining in Santa Maria for gravel and sand in the Mineral Resources discussion on Pages 4.9-20 and 4.9-21.

As described in Subsection 4.9.6, *Mineral Resources*, there are no mines or mineral extraction operations in the city and none are proposed. No gravel or sand mining exists in the city and is not required to be discussed. No revisions to the Draft EIR are required in response to this comment.

Response 6.273

The commenter suggests revising the Population and Housing discussion on Page 4.9-22 to clarify there will be two additional RHNA cycles through the horizon of the 2045 General Plan Update.

In response this comment, the following revision has been made to Subsection 4.9.7, *Population and Housing*:

The City's Sixth Cycle Housing Element indicates 5,418 residential units must be built by 2031 to satisfy the state required Regional Housing Needs Allocation. The plan would facilitate development that could help the City reach its housing needs goal. In addition, subsequent

Housing Element revisions would be made throughout the horizon of the 2045 General Plan Update in accordance with state law. These plans would facilitate development that could help the City reach its housing needs goal.

Response 6.274

The commenter suggests revising the Fire Protection discussion on Page 4.9-23 to provide information on the number of existing fire stations and firefighters in Santa Maria and the future needs of the fire department.

The following revision has been made to Subsection 4.9.8, *Public Services and Recreation*:

Fire protection services in Santa Maria are provided by the Santa Maria Fire Department (SMFD). SMFD provides a wide range of programs, which include fire suppression, all risk emergency services, public education programs, fire prevention, and life safety measures. SMFD also administers a hazardous materials business plan program in cooperation with Santa Barbara County. There are six fire stations in the city (City of Santa Maria 2025a).

SMFD operates five stations that serve the entire community and Fire Station No. 6 only serves the Santa Maria Public Airport (City of Santa Maria n.d.). There are currently five frontline fire engines and one ladder truck in service for the Santa Maria Fire Department. In addition, the department has an aircraft rescue and firefighting vehicle at the airport station, an urban search and rescue vehicle, three reserve engines, and a Type-III brush engine. For purposes of responding to structure fires, there are four engines and a truck available, leaving one engine free to cover the city. The fire department is currently budgeted for a total of 63 suppression personnel, with a ratio of 0.59 firefighters per 1,000 residents. Daily minimum staffing is 20 department personnel, including the Aircraft Rescue and Firefighting Specialist and a Battalion Chief. The average response time of the Santa Maria Fire Department in 2019 was 4:06 minutes for all calls, and 5:32 minutes when considering only calls for structure fires (City of Santa Maria 2020a).

Development facilitated by the plan would be served by the Santa Maria Fire Department, which provides fire protection and emergency medical services throughout the city. As future buildout occurs, the City would evaluate fire service operations and deployment to ensure adequate coverage.

Response 6.275

The commenter suggests revising the Police Protection discussion on Page 4.9-23 to provide information on the number of existing police stations and police officers in Santa Maria and the future needs of the police department.

The following revision has been made to Subsection 4.9.8, *Public Services and Recreation*:

Law enforcement services are provided by the City of Santa Maria Police Department (SMPD). There is one police station located at 1111 West Betteravia Road and approximately 700 police department personnel (City of Santa Maria 2024). Professional police services include maintaining civil order, preventive patrol, investigations, traffic control and enforcement, criminalistics, crime prevention, drug enforcement, and abuse prevention. The department houses the public safety dispatch center for police and fire, which receives all emergency 9-1-1 and non-emergency calls for services (City of Santa Maria 2020a). The Santa Maria Police

Department Communications Center handles over 170,000 incoming calls for service every year (about 465 per day). There are 63,000 emergency 9-1-1 calls per year (about 172 per day).

Development facilitated by the plan would increase population and activity levels in Santa Maria, potentially leading to higher demand for police protection services. The Santa Maria Police Department would provide law enforcement citywide, with development required to undergo security review during the plan check process and to pay police mitigation fees under SMMC Chapter 8-15.

Response 6.276

The commenter suggests revising the Schools discussion on Pages 4.9-23 and 4.9-24 to include the number of new schools needed for full buildout, including the locations of such facilities, and any plans for Allan Hancock College.

Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. Because the 2045 General Plan Update does not include future development plans for new school facilities, the Draft EIR does not evaluate the potential environmental impacts of such development, as such an evaluation would be speculative at this time. No revisions to the Draft EIR are required in response to this comment.

Response 6.277

The commenter suggests revising the Parks and Recreation Facilities discussion on Pages 4.9-24 and 4.9-25 as there is not enough land in Santa Maria to meet parkland standards. The commenter suggests adding detail on where additional parkland will come from. The commenter suggests adding other calculations to the footnote on Page 4.9-24 to describe the parkland needed to meet parkland standards at full buildout. The commenter suggests adding information on parkland at Los Flores and states that having future residential developers pay for parkland is infeasible.

The discussion in Subsection 4.9.8, *Public Facilities and Recreation*, pertaining to parkland acknowledges that the city's existing and future park service ratio with implementation of the 2045 General Plan Update would be below its service goal of 5 acres of parkland per 1,000 residents and additional parkland would be required.

Subsection 4.9.8, *Public Facilities and Recreation*, discusses potential environmental impacts related to park services at a programmatic level. Project-specific details, including acquiring and development of parkland, are required to be addressed through future planning and subsequent environmental review. Because the 2045 General Plan Update does not include future development plans for parkland at Los Flores, the Draft EIR does not evaluate the potential environmental impacts of such development. Furthermore, Los Flores Park is not a City park as it is not located within city limits, and it is not readily accessible to city residents. The Draft EIR does not evaluate the feasibility of existing Municipal Code requirements. Santa Maria Municipal Code Section Chapter 8-15 currently requires developers to pay impact fees that would promote the maintenance and expansion of public parks. These impact fees would assist in maintaining and expanding parkland in Santa Maria. As such, the Draft EIR in accordance with California Government Code Section 65995(3)(h), deems the payment of impact fees to be full and complete mitigation. No revisions to the Draft EIR are required in response to this comment.

Response 6.278

The commenter suggests revising the Other Public Facilities discussion on Page 4.9-25 to note that libraries are experiencing a reduction in use, note that all new school sites have library resources, and add information on where new library buildings would be located if needed.

Libraries are discussed in Subsection 4.9.8, *Public Facilities and Recreation*, of the Draft EIR, which concludes that impacts related to libraries would be less than significant. The commenter correctly notes that schools have library resources; however, library resources in schools are typically limited to use by students and not available to all members of the public. As a result, these library resources are not considered in Subsection 4.9.8, *Public Facilities and Recreation*, of the Draft EIR.

Pursuant to CEQA Guidelines Section 15145, if a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact. Because the 2045 General Plan Update does not include future development plans for a new library facility, the Draft EIR does not evaluate the potential environmental impacts of such development, as such an evaluation would be speculative at this time. No revisions to the Draft EIR are required in response to this comment.

Response 6.279

The commenter suggests revising the Wildfire discussion on Pages 4.9-25 and 4.9-26 to note the majority of Santa Maria is surrounded by agricultural production that limits wildfire. The commenter notes the new CalFire maps indicate there is potential for a fire hazard in the Santa Maria Riverbed and Solomon Hills area.

The discussion in Subsection 4.9.9, *Wildfire*, pertaining to fire risks states that Santa Maria is characterized by limited fire hazards, and describes the fire hazard severity zones identified by CalFire. The locations referenced by the commenter are designated as a Moderate Fire Hazard Severity Zone, but are not classified as a High or Very High Fire Hazard Severity Zone. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required.

Response 6.280

The commenter suggests revising the Wildfire discussion on Page 4.9-26 to note that the Santa Maria Police Department serves as the aerial firefighting base for CalFire.

In response to this comment, the following change has been made to Subsection 4.9.8, *Public Facilities and Recreation*, rather than the Subsection 4.9.9, *Wildfire*:

Development facilitated by the plan would increase population and activity levels in Santa Maria, potentially leading to higher demand for police protection services. The Santa Maria Police Department would provide law enforcement citywide, with development required to undergo security review during the plan check process and to pay police mitigation fees under SMMC Chapter 8-15. The Santa Maria Police Department also serves as an aerial firefighting base for CalFire.

Response 6.281

The commenter suggests revising the Population and Economic Growth discussion on Page 5-1 to clarify the current job housing balance and explain how the 2045 General Plan Update is going to meet a jobs-to-housing ratio of 1.2.

This comment relates to the projected jobs included in the 2045 General Plan Update and does not pertain to the analysis presented in the Draft EIR. Balancing jobs and housing is a policy objective handled through the 2045 General Plan Update and Housing Element under state planning law and RHNA requirements. CEQA Guidelines Section 15131 explicitly states that economic or social effects are not treated as significant environmental impacts unless they lead to a physical change in the environment. As such, Chapter 5, *Other CEQA Required Discussions*, Section 5.1.1 of the Draft EIR evaluates whether the project could induce growth or create environmental impacts associated with housing or employment changes. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required.

Response 6.282

The commenter suggests revising Policy LU-1.1 to clarify the definition of a complete community.

This comment relates to policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required.

Response 6.283

The commenter asks why there is not an action item for future planning in annexation areas.

Policy LU-2.3 in the General Plan addresses future planning in annexation areas. Policy LU-2.3 states “Future specific plans. Require specific plans or master plans in support of annexation in the Planned Annexation Area that are consistent with the following objectives:

- Prioritize new employment uses near existing institutions, such as educational or research and development (R&D) near Marian Regional Medical Center and Allaen Hancock College, and industrial or commercial uses adjacent to US-101 and along East Main to provide convenient access to regional transportation.
- Provide a diversity of higher density housing types for rental and ownership at a range of price points, to minimize land area expansion and conversion of agricultural lands.
- Design complete neighborhoods where residents have convenient walking and biking access to public facilities, services, and retail.
- Buffer schools, parks, and homes from infrastructure, major roadways, the Santa Maria regional landfill, industrial land uses, and other land uses that may produce odor or noise or negatively impact air quality.
- Support expansion of the Marian Regional Medical Center and other supportive medical offices in new development in close proximity to the existing Medical Center.

- Support higher education, including expansions of Allen Hancock College and other public, private, and post-secondary schools.
- Provide 5 acres of parks per 1,000 residents, per the City's park service standard, and plan for new public and recreational facilities.
- Develop a safe, connected network of sidewalks and trails that provides ample connections to destinations

This comment relates to the actions included in the 2045 General Plan Update itself and does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.284

The commenter suggests revisions to Policy LU-1.2 in accordance with previous comments on this policy.

Action LU-9.1.1 in the Land Use Element states the following: "As a part of the LAFCO Sphere of Influence boundary change and annexation process, the City will establish and maintain a stable Urban Growth Boundary to provide certainty for both urban development and agricultural operations." This comment is regarding policy language included in the 2045 General Plan Update that does not pertain to the analysis presented in the Draft EIR. Comments related to the 2045 General Plan Update will be provided to decision-makers for their consideration. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required in response to this comment.

Response 6.285

The commenter suggests Page 5-3 should include a reference to the No Urban Growth agreement on areas outside of the Sphere of Influence and annexation area.

Areas located outside of the City's proposed Sphere of Influence and annexation area are not currently in the jurisdiction of the City and could not be developed by the City until the boundary changes are approved by LAFCO. Accordingly, development located outside of the City's jurisdiction is not applicable to this Draft EIR. However, in anticipation of future Sphere of Influence boundary changes and annexations, Action LU-9.1.1 in the Land Use Element states the following: "As a part of the LAFCO Sphere of Influence boundary change and annexation process, the City will establish and maintain a stable Urban Growth Boundary to provide certainty for both urban development and agricultural operations." No revisions to the Draft EIR are required in response to this comment.

Response 6.286

The commenter states Section 5.2, Irreversible Environmental Effects, should be revised to state that no known archeological sites have been identified in the city over the last 35 years and they are not expected to be found north of Betteravia so there would not be impacts north of Betteravia. The

commenter contends that even south of Betteravia, it is unlikely to find resources since there have been agricultural activities on the undeveloped land.

Refer to Responses 6.160 through 6.163 for a discussion of cultural resources and how they are evaluated in the Draft EIR.

Response 6.287

The commenter states the Agricultural Identity objective needs to be revised or it will be used against the City by LAFCO for the proposed annexation areas.

Refer to Response 6.10 for a discussion of project objectives and how they were developed for the 2045 General Plan Update.

Response 6.288

The commenter states that the words “urban footprint” should be changed to “city boundary”. The commenter also requests that the second and third sentences in Section 6.2.2.b., Biological Resources, are deleted or revised because the mitigation measures are standard requirements and would apply today for current development projects except housing projects that are exempt from environmental review.

Subsection 6.2.2.c., *Biological Resources*, has been updated as follows:

Less growth and development outside of the existing ~~urban footprint~~ city boundary under the No Project Alternative would reduce the potential for habitat disturbance, leading to reduced impacts to biological resources.

Mitigation Measures BIO-1(a) through BIO-1(k) are not standard City requirements. These mitigation measures go beyond existing City requirements contained in the Santa Maria Municipal Code and current General Plan. No revisions to the Draft EIR are required in response to this comment.

Response 6.289

The commenter states that the Cultural Resource analyses in the Alternatives chapter should be revised to reflect their previous comments about no cultural resources being located north of Betteravia, so no more surveys will be required.

Refer to Responses 6.160 through 6.163 for a discussion of cultural resources and how they are evaluated in the Draft EIR.

Response 6.290

The commenter requests that changes to Sections 6-4, 6-5, and 6-6 are made based on comments provided previously.

This comment does not provide a specific concern regarding the contents or adequacy of the Draft EIR. CEQA Guidelines Section 15088 provides guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments on environmental issues received on a Draft EIR they need only respond to comments related to significant environmental issues. Therefore, no response to this comment or changes to the Draft EIR are required.

Response 6.291

The commenter requests that the description of Alternative 2 (Infill Only Alternative) be updated to state that it will have 16,000 units and commercial office development within the existing city limits. The commenter states that Alternative 2 is fatally flawed because there is no room in the city for 200 acres of new schools and hundreds of acres of new parks, and that the only way this could be accomplished is to allow many high-rise buildings and multi-level buildings on existing school sites. The commenter states this would result in a negative impact on aesthetics.

Subsection 6.3.1, *Description*, has been updated as follows:

For the purpose of this analysis, the Infill Only Alternative is assumed to result in a similar overall level of buildout and population growth compared to the 2045 General Plan Update, despite the exclusion of future development in the eastern annexation area. Therefore, this analysis assumes that the Infill Only Alternative would result in the addition of approximately 16,000 new residential units and up to 23,750 new jobs associated with new commercial development within city limits.

The Draft EIR discusses potential environmental impacts related to Alternative 2 at a programmatic level in Subsection 6.3.2, *Impact Analysis*. The Draft EIR provides a program-level analysis of the proposed plan and plan alternatives, consistent with CEQA Guidelines 15168 for long-range planning documents. As Alternative 2 does not include proposals for specific projects, it is not possible to know project-specific details such as the locations and heights of new development, and the analysis in the Draft EIR analyzed the potential impacts that would result from implementation of Alternative 2 at a broad level. Project-specific details will be addressed through future planning and project-level environmental review.

Under CEQA, the alternatives analysis is intended to compare how reasonable alternatives would avoid or substantially lessen the significant environmental impacts identified for the proposed plan, consistent with the rule of reason (CEQA Guidelines Section 15126.6). Environmental topics, such as aesthetics, that were screened out of full analysis in the Draft EIR because they would not result in significant impacts are not required to be analyzed for each alternative, unless an alternative would itself result in a new significant impact in one of those topics. As described in Section 6.3.1, *Description*, Alternative 2 would adopt the 2045 General Plan Update, including all goals and policies, as it is described in Section 2, *Project Description*. Alternative 2 does not include any additional revised policies, amendments to the existing zoning and land use regulations, or other changes to City ordinances that would permit increased building heights in comparison to the proposed plan. The City's Zoning Ordinance standards protect the visual character of the city by regulating the size, mass, and design of development projects. Consistent with the proposed plan, new development that would be facilitated by Alternative 2 would be subject to these standards, thereby preserving the city's visual character and ensuring compatibility with surrounding development and impacts would be similar to the proposed plan. As such, no other revisions to the Draft EIR are required in response to this comment. Nonetheless, the commenter's opinions regarding Alternative 2 will be shared with City decision makers.

Response 6.292

The commenter states Alternative 2 (Infill Only Alternative) would retain the No Urban Growth Boundary in its current location. The commenter requests that the last sentence of Section 6.3.2a., Agricultural Resources, be deleted because most urban agriculture has urban land use designations

on these lands for future development and these residentially designated lands have already been included in the Housing Element.

As stated in Subsection 6.3.2, *Agricultural Resources*, the Farmland Mapping and Monitoring Program still designates areas in the city as Important Farmland; however, the conversion of these areas and associated land use changes has been previously evaluated in earlier environmental documents which are listed in Section 4.1, *Agricultural Resources*.

The Draft EIR acknowledges that conversion of farmland could occur under Alternative 2; however, these impacts were previously addressed by previous EIRs, including the Sphere of Influence Expansion EIR (SCH #90010930), Area 9 Specific Plan EIR (SCH #2008071018), Blosser-Southeast Specific Plan Amendment Supplemental EIR (SCH #1994107909), and Betteravia Plaza General Plan Amendment, Land Use and Zone Change and Development Agreement EIR (SCH #2015011029). Though already identified as urban land use designations in City of Santa Maria planning documents, the Department of Conservation Important Farmland data has yet to be updated and information regarding previous environmental review has been provided to disclose all available information for the conversion of agricultural land in the city limits. As this comment does not identify a new or substantially different environmental impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no revisions to the Draft EIR are required.

Response 6.293

The commenter states that all other sections need to be revised per previous comments made in this comment letter.

This comment does not provide a specific concern regarding the contents or adequacy of the Draft EIR. CEQA Guidelines Section 15088 provides guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments on environmental issues received on a Draft EIR they need only respond to comments related to significant environmental issues. Therefore, no response to this comment or changes to the Draft EIR are required.

Response 6.294

The commenter requests a map for Alternative 3 (Greater Annexation Alternative) that shows how many acres of land would be annexed. The commenter states that Alternative 3 might be the best because it would give the city additional land for buildout of the General Plan as well as for future school sites and parks.

Under CEQA, the alternatives analysis is intended to compare how reasonable alternatives would avoid or substantially lessen the significant environmental impacts identified for the proposed plan, consistent with the rule of reason (CEQA Guidelines Section 15126.6). In accordance with CEQA Guidelines Section 15126.6(d), the Draft EIR need only include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Alternative 3, as described in Chapter 6, *Alternatives*, Section 6.4.1, includes a description of Alternative 3 which indicates this alternative would include the annexation of a larger area east of the city limits. Project specific details regarding acreage, exact location, and projects are not available for evaluation of this alternative as there are no specific project proposals included in Alternative 3. However, the information available is sufficient to complete a broad evaluation, analysis, and comparison of this alternative to the proposed project. The commenter's opinion regarding the merits of Alternative 3 will be shared with City decisionmakers.

Response 6.295

The commenter states that Sections 6-10-13 need to be revised per previous discussions.

This comment does not provide a specific concern regarding the contents or adequacy of the Draft EIR. CEQA Guidelines Section 15088 provides guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments on environmental issues received on a Draft EIR they need only respond to comments related to significant environmental issues. Therefore, no response to this comment or changes to the Draft EIR are required.

Response 6.296

The commenter states the discussion of Alternative 2 (Infill Only Alternative) does not adequately discuss items that prove this alternative to be fatally flawed including the location of new school sites, the location of new parks, aesthetic impacts associated with high rise buildings and two-to-three-story school buildings on existing school campuses, and water and sewer upgrades required to serve 16,000 additional units. The commenter states Alternative 2 has only one net benefit impact and that is on agricultural resources.

Refer to Response 6.291 for a discussion of revisions to Chapter 6, *Alternatives*. A discussion of the feasibility of Alternative 2 is included in Section 6.5, *Environmentally Superior Alternative*, of the EIR, which states, “Although the Infill Only Alternative would be the Environmentally Superior Alternative, this alternative would not fulfill the primary objectives of the 2045 General Plan Update, including the provision of housing quality and various housing choices or improving opportunities for connected growth. Further, the Infill Only Alternative would not enhance new and existing neighborhoods such that each neighborhood would be a Complete Neighborhood or provide innovative housing and may result in the City failing to meeting its RHNA obligations in accordance with State law as it would significantly reduce the affordable housing options and limit new housing to infill only and redevelopment.” The Draft EIR discusses potential environmental impacts related to Alternative 2 at a programmatic level in Subsection 6.3.2, *Impact Analysis*. The Draft EIR provides a program-level analysis of the proposed plan and plan alternatives, consistent with CEQA Guidelines 15168 for long-range planning documents. As Alternative 2 does not include proposals for specific projects, it is not possible to know project specific details, including locations, heights, or localized infrastructure upgrades at this time, and the analysis in the Draft EIR analyzed the potential impacts that would result from implementation of Alternative 2 at a broad level. Project-specific details will be addressed through future planning and project-level environmental review. No revisions to the Draft EIR are required in response to this comment.

Response 6.297

The commenter suggests that Table 6-1 should be formatted to fit on one page to make it easier to read.

The formatting of Table 6-1 has been updated so that the table fits on one page. This correction does not affect the analysis or conclusions of the Draft EIR.



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September 28, 2025

Dana Eady
City of Santa Maria
deady@cityofsantamaria.org

Re: Draft General Plan and Draft EIR

Dear Dana,

On behalf of Santa Barbara County Action Network, we congratulate you and the entire General Plan team on completing a thorough Draft Plan and Draft EIR. As you know, SBCAN has urged that the plan be based on the infill alternative and remains disappointed that the plan is based on the expectation of annexing nearly 1,000 acres of prime agricultural land. Given the Local Agency Formation Commission’s history of not approving such annexations over the last couple of decades, this is a highly speculative expectation. Fortunately, the draft plan will provide sound guidance for the future even if the annexations don’t happen. Unfortunately, a lot of planning effort is going into something that shouldn’t—and likely—won’t happen.

The Draft Environmental Impact Report identifies the impact of land use changes in the proposed annexation area on agricultural resources as significant and unavoidable, noting that no feasible mitigation is available. The fact is that these impacts are avoidable. The City’s Alternatives Analysis (Feb. 2023) found that each of the Land Use Alternatives would be able to meet the needs of the community. In fact, the Infill Alternative was found to be able to provide the most capacity for housing. The City, therefore, must not find that the impact of land use changes in the proposed annexation area on agricultural resources is significant and unavoidable. The impact would be significant, but not unavoidable.

On March 3, 2025, SBCAN submitted comments on the Policy Frameworks. Some of our comments were supportive of the content and others suggested actions that may be too detailed for a general plan. Some of our other comments that don’t appear to be addressed, but are at a level of detail that aligns with the rest of the document, are listed below. For reference we’re including the Policy Framework identifiers and please reference our March 3 letter for more details.

HEJ 1.1: Trees planted as buffers should be drought tolerant. Explore sources of methane pollution and adopt policy actions to reduce these.

HEJ 1.3: Adopt policies to cause truck drivers to go slower for lower emissions and better safety.

HEJ 1.6: Identify remaining idle oil wells and adopt actions to remediate those and previously abandoned wells that may not be properly abandoned.

HEJ 2.2: Adopt policies to require installation of clean energy technology in all new homes.

CIR 1.1: Implement traffic calming to slow vehicles down, crosswalks with bulb-outs and other measures to reduce speed.

7.1

7.2

We also urge you, as we said at a Planning Commission study session, to restructure drainage channels to make them more like the creeks they had been at one time and to be a source of beauty and recreation.

7.3

There is a need for more parks, open space, hiking trails, off-street bikeways and generally safer streets. We urge you to provide for those in the general plan update.

Finally, in the time since the City sought comments on the Policy Frameworks, several legislative bills aimed at streamlining approval of housing development across California have passed into law and more may be in our future. In light of that, *SBCAN* urges the City to strongly consider health, environment, and safety impacts of all proposed developments in Santa Maria.

7.4

Thank you for your consideration of our comments.

Sincerely,



Ken Hough, Co-Executive Director Jeanne Sparks, Co-Executive Director

cc: *SBCAN* Board of Directors

Letter 7

COMMENTER: Ken Hough and Jeanne Sparks, Co-Executive Directors of Santa Barbara County Action Network

DATE: September 28, 2025

Response 7.1

The commenter commends the City and General Plan team for producing a thorough Draft General Plan and Draft EIR. The commenter reiterates their longstanding support for the Infill Only Alternative and expresses concern that the Draft General Plan is based on the assumption of annexing nearly 1,000 acres of prime agricultural land. The commenter states that such annexations have not been approved by the Local Agency Formation Commission in recent decades. While the commenter emphasizes that significant planning resources are being directed toward a scenario that is unlikely to be realized. The commenter also challenges the Draft EIR's conclusion that impacts to agricultural resources from land use changes in the proposed annexation area are "significant and unavoidable," arguing that these impacts are avoidable under the Land Use Alternatives.

The commenter's preference for the Infill Only Alternative will be passed on to decision-makers for their consideration. While the commenter expresses concern about the likelihood of the proposed annexation being approved, the Draft EIR, in Chapter 1, Introduction, page 1-5, recognizes that annexation is a discretionary process subject to review and approval by the Local Agency Formation Commission (LAFCO). The 2045 General Plan Update establishes policies and land use designations intended to guide future growth within existing city limits and provide a framework for potential growth scenarios, including annexation, if approved by LAFCO. The Draft EIR evaluates impacts for both existing city limits and the proposed annexation area, and the 2045 General Plan Update is structured to function as a citywide policy document regardless of whether annexation is ultimately approved. Growth projections in the plan address annexation, and many policies, such as those for infill development, mixed-use corridors, housing diversity, and infrastructure planning, apply broadly and would continue to guide development even if annexation does not occur.

The commenter suggests that the impact of land use changes in the proposed annexation area on agricultural resources should not be considered unavoidable, citing the feasibility of meeting housing needs under the Infill Only Alternative. The commenter is correct that impacts to agricultural resources would be less than significant under the Infill Only Alternative. However, the detailed impact analysis in Chapter 4, Impact Analysis, evaluates the potential impacts of the 2045 General Plan Update as proposed, which includes the planned annexation areas. This approach is consistent with CEQA Guidelines Section 15126.2(a), which requires that the EIR evaluate the significant environmental effects of a proposed project.

As discussed in Section 4.1, Agricultural Resources, on pages 4.1-1 through 4.1-15 of the Draft EIR, implementation of the 2045 General Plan Update as proposed would result in significant and unavoidable impacts to agricultural resources. The commenter suggests this determination is inaccurate, claiming the City could avoid significant impacts to agricultural lands by adopting one of the alternatives described in the City's Alternatives Analysis prepared in 2023: https://www.imaginesantamaria.com/_files/ugd/e3bef4_d80cf7b24f8e4aa580244179b5b883d1.pdf. Specifically, the commenter states the Infill Only Alternative as a feasible option that would meet community needs while avoiding annexation of agricultural lands, thereby reducing impacts to a less than significant level.

The City acknowledges that some alternatives, including the Infill Only Alternative, would result in reduced or avoided impacts to agricultural lands. However, as explained in CEQA Guidelines Section 15126.6, potential impacts from alternatives are evaluated separately from the proposed project to explore feasible options that could reduce or avoid significant environmental effects. The project alternatives, discussed in Chapter 6, *Alternatives*, are not used to modify or reinterpret the impact conclusions of the proposed project.

As described in Section 15126 of the CEQA Guidelines, an EIR must evaluate potential significant impacts of the project as proposed, which is presented in Chapter 4, *Impact Analysis*, of the Draft EIR. This ensures that the environmental impacts of the actual project under consideration are clearly disclosed to decision-makers and the public. Therefore, while alternatives may demonstrate the potential to reduce impacts, they do not alter the significance determinations made for the proposed project Chapter 4, *Impact Analysis*.

In summary, the Draft EIR appropriately identifies impacts to agricultural resources based on the proposed project. The potential for reduced impacts under alternatives is addressed in Chapter 6, *Alternatives*. Therefore, consistent with the CEQA Guidelines Section 15126.2(a), the Draft EIR concludes that the conversion of agricultural land under the proposed General Plan Update would result in a significant and unavoidable impact, and that no feasible mitigation is available to reduce this impact to a less-than-significant level.

Response 7.2

The commenter mentions they previously submitted comments on the Policy Frameworks document. The commenter reiterates several suggestions from their previously submitted comments that align with the level of detail in the 2045 General Plan Update and requests their consideration.

This comment pertains to the policies within the 2045 General Plan Update and does not raise a question or concern regarding the environmental analysis presented in the Draft EIR. As this comment does not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Comments related to policy content will be passed on to decision-makers for their consideration.

Response 7.3

The commenter encourages the City to restructure existing drainage channels to resemble natural creeks, enhancing their aesthetic and recreational value. Additionally, the commenter urges the 2045 General Plan Update to include provisions for more parks, open space, hiking trails, off-street bikeways, and safer streets to improve community livability and access to outdoor amenities.

The General Plan Update includes goals and policies that support enhancement of open space, parks, and multimodal infrastructure. These topics are addressed in the Draft EIR in several resource sections:

- Subsection 4.9.1, *Aesthetics*, evaluates potential impacts related to scenic quality and visual character. The Draft EIR concludes that development facilitated by the 2045 General Plan Update would not substantially degrade public views or scenic resources and would result in less than significant impacts with adherence to existing Zoning Ordinance standards for size, mass, design, and lighting. While the comment suggests redesigning drainage channels to resemble natural creeks for aesthetic and recreational purposes, that specific topic is not part of

the proposed project and was not evaluated in the Draft EIR. This suggestion will be forwarded to decision-makers for consideration during the planning process.

- Subsection 4.9.8, *Recreation*, assesses the adequacy of existing parkland and recreational facilities. The Draft EIR determined that the 2045 General Plan Update would not result in the need for new or expanded facilities beyond what is planned, and impacts would be less than significant.
- Section 4.7, *Transportation and Traffic*, evaluates impacts to pedestrian and bicycle infrastructure and supports improvements consistent with the 2020 City of Santa Maria Active Transportation Plan:
<https://www.cityofsantamaria.org/home/showpublisheddocument/27722/637510471193430000>. The Draft EIR concludes that the 2045 General Plan Update would not conflict with applicable transportation plans and would result in less than significant impacts.

No revisions to the Draft EIR are required in response to this comment.

Response 7.4

The commenter states that since the City solicited input on the Policy Frameworks, several new state laws have been enacted to streamline housing development approvals. In light of these changes, the commenter urges the City to carefully consider the health, environmental, and safety impacts of all proposed developments in Santa Maria.

The Draft EIR evaluates impacts related to air quality and greenhouse gas emissions, biological resources, hazards, noise exposure, and transportation across multiple sections:

- Section 4.2, *Air Quality and Greenhouse Gas Emissions*, assesses emissions from construction and operation of future development, including impacts to sensitive receptors and consistency with regional air quality plans.
- Section 4.3, *Biological Resources*, evaluates impacts to sensitive species and habitats, and provides mitigation measures to reduce or avoid potential impacts to biological resources.
- Section 4.5, *Hydrology and Water Quality*, addresses drainage, flood hazards, and water quality protection within the plan area.
- Section 4.6, *Noise*, evaluates construction and operational noise impacts, including vibration and noise exposure near sensitive land uses.
- Section 4.7, *Transportation and Traffic*, analyzes vehicle miles traveled, safety, and emergency access within the plan area.
- Subsection 4.9.3, *Geology and Soils*, reviews potential impacts related to seismic hazards, liquefaction, expansive soils, and other geotechnical conditions that could affect development under the 2045 General Plan Update.
- Subsection 4.9.4, *Hazards and Hazardous Materials*, reviews potential risks from the use and transport of hazardous materials, existing hazards, and emergency response.

The analysis within the Draft EIR considers the health, environmental, and safety impacts associated with implementation of the 2045 General Plan Update. The Draft EIR is a programmatic environmental document prepared under CEQA to evaluate the broad impacts of implementation of the 2045 General Plan Update. The 2045 General Plan Update does not include specific development projects. Future development facilitated by the 2045 General Plan Update would undergo separate environmental review as determined by the City at the time a project application is submitted. No revisions to the Draft EIR are required in response to this comment.



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September 29, 2025

Via Electronic Mail

Dana Eady, Planning Division Manager
 City of Santa Maria
 Community Development Department, Planning Division
 110 South Pine Street, Suite 101
 Santa Maria, CA 93458
 deady@cityofsantamaria.org

Re: Comments on the Draft Santa Maria 2045 General Plan Update and Draft
 Environmental Impact Report

Dear Dana Eady:

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties (Grower-Shipper), we submit comments to the City of Santa Maria (City) on the Draft Santa Maria 2045 General Plan Update (General Plan) and its Draft Environmental Impact Report (EIR) (SCH# 2025020584).

Grower-Shipper represents 150 growers, shippers, farm labor contractors, and supporting agribusinesses on matters related to agriculture within Santa Barbara and San Luis Obispo Counties, including within and around Santa Maria. Grower-Shipper members grow important crops that are consumed locally, such as broccoli, strawberries, lettuce, vegetable transplants, flowers, tree fruit, and wine grapes, and statewide. Grower-Shipper's mission is to maintain a vibrant agricultural industry in the region by assisting members to address challenges and capitalize on strengths and opportunities.

Grower-Shipper thanks the City for the opportunity to again comment on the formulation of its General Plan. Grower-Shipper submitted comments on the General Plan Policy Framework on February 28, 2025, which are attached hereto and fully incorporated herein. Grower-Shipper appreciates the City's consideration of its initial comments and any revisions the City made to its proposed policies for the General Plan that are responsive to concerns expressed in Grower-Shipper's comments.

However, Grower-Shipper remains concerned about several proposed policies and actions included in the General Plan, specifically ones that would result in locating sensitive

8.1

uses and/or disadvantaged communities (DACs) near existing critical agricultural operations or that improperly identify the areas underlying those operations as DACs. Grower-Shipper is also concerned with potential regulatory conflicts and impediments to agriculture operations and transportation that appear likely with certain proposed policies and actions. Grower-Shipper is further concerned that the 2045 General Plan Update Draft EIR may not comply with the California Environmental Quality Act (CEQA)¹ regarding its treatment of Health and Environmental Justice (EJ) Element and policies and actions. These concerns and others are discussed in more detail below.

8.1

A. The General Plan Improperly Identifies Several Unpopulated Areas as DACs

The General Plan EJ Element relies primarily on entire census tracts to determine DACs, which creates certain inaccuracies. The western portions of Census tracts 20.11, 24.09, and 24.10 are agricultural and industrial areas that are largely unpopulated and primarily include facilities and other operations rather than communities. Like census tract 25.03, which was excluded for a similar reason,² these tracts should be excluded as DACs from the General Plan EJ Element. At a minimum, the City should take a more granular approach and only identify the specific block groups, if any, within those larger tracts that accurately qualify as DACs—as it appears to do with the “5 block groups that are distributed across the city.”³ The City is under no obligation to define DACs using entire census tracts. Senate Bill (SB) 1000 (2016), codified in relevant part in Government Code section 65302(h), identifies DACs as an unspecified “area.”⁴ Similarly, section 39711 of the Health and Safety Code—referenced in SB 1000—mandates the identification of DACs based only on “areas.”⁵

8.2

The General Plan’s imprecise determination of DACs can and likely will result in new and increased restrictions on existing operations that support agricultural uses, and on the agricultural uses themselves, throughout the City and region. These operations and uses may even be completely halted by future policies, actions, and decisions intended to protect DACs that do not exist in these unpopulated areas. Obstructing established agricultural operations and uses in this manner controverts the California Right to Farm Act⁶ and the Santa Barbara County Right-to-Farm Ordinance,⁷ which prohibits a changed condition in a locality to result in agricultural operations and uses becoming nuisances.

Classifying large agricultural and industrial areas that are relatively unpopulated as DACs is unsupported and will result in significant adverse consequences for Grower-Shipper members. Restrictions placed upon these operations and uses can broadly affect local

¹ Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15000 et seq. (CEQA Guidelines).

² Draft 2045 General Plan EJ Element, p. 4, fn. 2.

³ *Id.*, p. 3.

⁴ Gov. Code, § 65302, subd. (h)(4)(a).

⁵ Health and Safety Code, § 39711, subd. (a).

⁶ Cal. Civ. Code, § 3482.5, subd. (a).

⁷ Santa Barbara County Code, § 3-23, subd. (d).

agricultural resources, resulting in adverse impacts to the local food supply and economy. This cannot be the City's desired result. Agricultural working lands and essential supporting land uses must not be identified as DACs. Accordingly, Grower-Shipper opposes the identification of census tracts 20.11, 24.09, and 24.10 as DACs and requests that the City reevaluate these areas for the next iteration of the General Plan EJ Element.

8.2

B. Several General Plan Policies and Actions Could Result in Adverse Consequences to Local Agricultural Operations and Resources and the Economy or May Conflict with or Impede Existing Statutes and Regulations

Several General Plan proposed policies and actions, discussed below, could result in unintended adverse consequences for the City's agricultural operations and resources and the local and regional economy and should be reconsidered.

Action COS-5.2.4, requiring an update to the Municipal Code to establish a minimum buffer between agricultural uses and development from sensitive land uses, directly threatens the City's agricultural resources and operations. While buffers could be one tool with limited utility, the most effective way to protect agricultural resources is to refrain from inducing sensitive or residential uses into or next to agricultural areas, both within and adjacent to the City, and to protect the vitality of essential agricultural activities and support facilities, rather than hindering them. Policy HEJ-1.1, discussed more below, likewise threatens agricultural resources and operations by imposing new restrictions on existing operations instead of protecting these resources in a manner that benefits the City and the region. Further, as discussed, introducing policies and actions that would restrict and potentially eliminate existing agricultural resources controverts the California Agricultural Protection Act and the Santa Barbara County Right-to-Farm Ordinance, as well as the California Land Conservation Act (Williamson Act)⁸ and, without sufficient analysis in the EIR, CEQA (discussed below).

8.3

Actions COS-4.1.1, COS-4.1.3, and COS-5.2.3, Policy S-3.2, Policy HEJ-1.4 and its actions, and Policy HEJ-1.8 introduce air, pesticide, and water quantity and quality controls that may conflict with or impede existing statutory and regulatory requirements for resources and hazards that are already highly regulated by laws and agencies like the Porter-Cologne Water Quality Control Act, the Sustainable Groundwater Management Act, the Federal Clean Water Act, the Regional and State Water Quality Control Board, the U.S. Environmental Protection Agency, the California Department of Pesticide Regulation, and the County Agricultural Commissioner, to name only a few. Additional regulations of agricultural air emissions, pesticides, or water quantity and quality by the City are inappropriate and must be removed.

Actions CIR-4.2.2 and LU-4.1.2, Policy N-2.2 and its actions, and Policy HEJ-1.2 require transportation controls and related actions that will adversely affect the transportation of agricultural products. East-west movement of perishable and time-sensitive agricultural

⁸ Cal. Gov. Code, § 51200 et. seq.

produce, vehicles, and equipment is essential to agriculture and the jobs and businesses it supports, both within and beyond the City. Transportation corridors must remain open and efficient. The City must provide adequate transportation options and must not allow its General Plan to restrict routes and timely movement of agricultural produce, equipment, and support vehicles.

Policies ECON-2.8, LU-2.1, and LU-2.3 (among others), and several General Plan maps, identify and discuss annexation of agricultural lands east of U.S. Highway 101 that would dramatically increase adverse impacts to agricultural resources, both from the immediate conversion of agricultural land and through additional regulatory requirements and conflicts from farming near unrelated urban uses. Grower-Shipper therefore opposes a subset of these annexations and notes that the resulting potentially significant impacts were not accurately identified, much less analyzed or mitigated to the maximum extent feasible, in the Draft EIR in violation of CEQA (discussed below). Grower-Shipper does not necessarily oppose the annexation of a limited portion of land north of Main Street, and the block immediately east of Marian Regional Medical Center, despite that these areas contain prime farmlands of exceptional quality, in recognition of the need to balance multiple priorities. However, the proposed Specific Plans for these annexed areas must include policies and requirements to minimize conflicts between the new urban uses and existing agricultural operations, in large part by locating sensitive uses—especially schools and childcare facilities—and active recreation and residential uses as far as possible from existing agricultural operations.

8.3

Importantly, the specificity and detail in the General Plan’s proposed EJ policies and actions is not required. SB 1000 requires all general plans include an EJ Element and that the Element identify policies and objectives that, generally, reduce health risks to DACs by certain means such as a reduction in pollution exposure, and promote civic engagement and prioritize programs addressing the needs of DACs. It does not, however, require any level of specificity for these EJ policies or actions. Moreover, the Attorney General SB 1000 Best Practices⁹ is not controlling authority.¹⁰ At most, it may be considered persuasive, like a formal Attorney General legal opinion.¹¹ Notwithstanding, SB 1000 Best Practices does not claim that SB 1000 mandates specific general plan EJ policies or actions and acknowledges that “an effective environmental justice policy in one jurisdiction may not be relevant or effective in another...” and that “[a]nyone reviewing this document to determine SB 1000

⁹ Available at <https://oag.ca.gov/environment/sb1000>.

¹⁰ See, e.g., *Thorning v. Hollister School District* (1992) 11 Cal.App.4th 1598, 1604.

¹¹ Although, courts regularly find Attorney General opinions to not be persuasive (see, e.g., *People ex rel. Foundation for Taxpayer & Consumer Rights v. Duque* (2003) 105 Cal.App.4th 259, 268; *Almond Alliance of California v. Fish & Game Com.* (2022) 79 Cal.App.5th 337, 358; *Sukut Construction, Inc. v. Rimrock CA LLC* (2011) 199 Cal.App.4th 817, 830; *Rideout Hospital Foundation, Inc. v. County of Yuba* (1992) 8 Cal.App.4th 214, 227), and, in any event, best practices are not classified as a formal opinion. The Attorney General labels them informally as “colleague letters.”

compliance responsibilities should consult their own attorney for legal advice.”¹² The Attorney General’s suggestions and examples for policies and actions use flexible language, like “may” and could,” indicating an agency *may* exercise its discretion, where appropriate, to develop a policy to address a particular concern.¹³ At base, SB 1000 Best Practices does not give directions, it makes suggestions.

Thus, the City is not obligated to include the level of detail that it currently includes in some of its proposed EJ policies and actions. For example, proposed Policy HEJ-1.1 could and should be revised as follows:

Policy HEJ-1.1: ~~Protect against industrial~~ Reduce potential exposure to pollution.
~~Prevent industrial and commercial facilities from exposing~~ Avoid siting sensitive land uses (e.g., schools, playgrounds, housing, hospitals, senior centers, and daycare centers), and/or land uses with a reasonable likelihood of accommodating DACs to ~~harmful air pollution and toxic chemicals, especially in DACs that have experienced disproportionate pollution burdens, by carefully analyzing proposed development and the expansion of~~ near agricultural, industrial, and commercial uses.

This policy revision would better address the fundamental need for good land use planning and compatibility to proactively prevent land use conflicts and resulting issues. It also better comports with the generalized directive in SB 1000 to “[i]dentify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure...”¹⁴ and would avoid conflicts with the California Agricultural Protection Act and the Santa Barbara County Right-to-Farm Ordinance.

Revising or eliminating the above-discussed proposed General Plan policies and actions would help to avoid unintended and significant adverse consequences to agricultural resources and operations and the economy and would not result in additional, increased, or disproportionate impacts to natural resources or DACs. The General Plan is in draft form, and its policies and actions are only proposed at this time. The City has the discretion to review and process feedback from stakeholders like Grower-Shipper and its members and make changes that will avoid the significant impacts discussed in this letter. Accordingly, Grower-Shipper requests that the City make these changes, and any others it may deem problematic for the City’s agricultural community and local and regional economy.

¹² Attorney General SB 1000 Best Practices, pp. 2, 13.

¹³ *Id.*, pp. 13-14.

¹⁴ Gov. Code, § 65302, subd. (h)(1)(A).

C. The General Plan Draft EIR Fails to Sufficiently Analyze All General Plan Policies and Actions, in Violation of CEQA

The Santa Maria 2045 General Plan Draft EIR omits necessary analysis of several General Plan policies and actions. Critically, the Draft EIR appears to omit any analysis whatsoever of the General Plan EJ Element and its proposed EJ policies and actions. This oversight is problematic because several proposed EJ policies and actions, such as those promoting new infrastructure, would result in changes to the physical environment that could cause direct and reasonably foreseeable indirect significant adverse environmental impacts requiring analysis commensurate with their level of detail,¹⁵ including in a cumulative scenario,¹⁶ and potentially requiring mitigation pursuant to CEQA.¹⁷ The Draft EIR also does not analyze the inherent conflict between some of the DACs identified in the EJ Element and existing zoning for agriculture and resulting impacts, and fails to identify any feasible mitigation measures that may reduce these impacts, in violation of CEQA.¹⁸ The Draft EIR further fails to adequately analyze the effects of the General Plan’s annexation policies on agricultural resources. The EIR summarizes previous environmental review of annexation areas located west of Highway 101 but does not analyze impacts to areas located east of the highway, despite that these areas contain important and prime farmland that will be threatened by urban encroachment resulting from annexation.

8.4

These omissions lessen the EIR’s value as an informational document for decisionmakers and the public.¹⁹ “The EIR is to inform other governmental agencies and the public generally of the environmental impact of a proposed project” and “to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.”²⁰ Grower-Shipper represents the local agricultural citizenry that is apprehensive about the environmental effects of the General Plan on agricultural uses and

¹⁵ A program EIR (see CEQA Guidelines, § 15168), such as a general plan EIR, may analyze impacts at a less granular level than a project-specific EIR but still must address all reasonably foreseeable effects. (See fn. 17, *post.*) “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” (CEQA Guidelines, § 15146.) Here, where the EJ policies and actions have a high degree of specificity, the EIR must analyze impacts resulting from those policies and actions at a corresponding degree.

¹⁶ See CEQA Guidelines, § 15130.

¹⁷ See Pub. Resources Code, §§ 21002, 21002.1, 21065.3, 21068; CEQA Guidelines, §§ 15121, 15126.2, 15126.4, 15358, [an EIR must analyze a project’s direct and reasonably foreseeable indirect significant environmental effects related to a physical change and describe feasible measures that could minimize these effects]; see also, e.g., *Save the El Dorado Canal v. El Dorado Irrigation Dist.* (2022) 75 Cal.App.5th 239, 263.)

¹⁸ See Pub. Resources Code, § 21002.1; CEQA Guidelines, §§ 15126, 15126.2, 15126.4.

¹⁹ See Pub. Resources Code, §§ 21005, 21061; CEQA Guidelines, §§ 15003, subd. (c), 15121; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 520-21, internal citation omitted [omission of required discussion can result in EIR not “serv[ing] its purpose as an informational document;” “[t]he relevant informational document here is the EIR, and the EIR must communicate [to] ‘the public and the government officials deciding on the project’”].

²⁰ CEQA Guidelines, § 15003, subds. (c),(d), citing *No Oil, Inc. v. City of Los Angeles*, 13 C. 3d 68 and *People v. County of Kern*, 39 Cal. App. 3d 830.

Dana Eady
Re: Comments on Draft Santa Maria 2045 General Plan Update and Draft EIR
September 29, 2025
Page 7

accordingly requests that the City prepare the analysis required under CEQA to adequately inform decisionmakers and the public about these impacts and mitigate them to the extent feasible.

Thank you for your consideration of this comment letter. Grower-Shipper retains the right to submit further comments and evidence, if warranted, up to the final public hearing on the matter.²¹ We are happy to answer any questions the City may have. Please feel free to contact me at ktaber@somachlaw.com. Also, please add me the list of parties that receive all notices regarding the EIR and General Plan, including the Notice of Determination, when it is posted.

8.4

Sincerely,



Kelley M. Taber

Attachment

²¹ See, e.g., *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124.Cal.App.4th 1184, 1200 [CEQA comments considered up to final project hearing].

ATTACHMENT



February 28, 2025

Dana Eady
City of Santa Maria Planning Division Manager
deady@cityofsantamaria.org

Re: City of Santa Maria General Plan Policy Framework

Dear Ms. Eady,

Thank you for the opportunity to submit comments on the General Plan Policy Framework and to serve on the Technical Advisory Committee. In addition to the comments provided verbally at the most recent TAC meeting, we would like to highlight a few key points. We look forward to continuing to work with the City to further refine these policies as the foundational document for the forthcoming General Plan, and implementing the General Plan for many years to come.

In general, we suggest the documents are further refined to prevent potentially conflicting policy directives. We are also concerned with expansions of requirements that present feasibility limitations in the future (ex: wildlife corridors, ecological buffers, wilding). Several of the policies are beyond the scope and expertise of the City of Santa Maria and would be better left to the implementation and enforcement mechanisms already in place (ex: intent of ecological buffers addressed through CEQA, pesticide regulation within the regulatory authority of the County Ag Commissioner and CA DPR, and water quality regulatory authority of the Water Board, etc.).

Finally, we are concerned with the addition of development requirements and exactions, as well as regulatory policies, that go above and beyond the ample body of other existing and future regulatory mandates. If it moves forward in the Draft General Plan, this expansion will affect the feasibility and affordability of developing new and affordable housing, as well as business and employment opportunities (ex: Circulation, Community Benefits Agreements, Land Use, Recreation, Safety, etc.).

The following are some additional comments about the specific draft Goals, Policies, and Actions.

Conservation and Open Space Policy Framework

1. **Reduce mowing.** We support the regular maintenance of City lands to reduce invasive pests and diseases, but are concerned that a prescriptive reduction of mowing could also create problems with potential hosts and IPM practices,. One such example is the Impatiens Necrotic Spotted Virus (INSV): weed management plays an important role in breaking the host cycle and disease management, which can have potentially devastating impacts to neighboring agricultural areas.
2. **Agricultural Preservation.** We support the preservation of agricultural lands. We are unclear on what is meant by 2.1.2 and the type of easements intended. Other options for technical assistance and education with more specialized expertise in agriculture are available than what would be expected from the City.
3. **Sustainable Agriculture.** We share the interest in promoting sustainable agriculture. However, we would not expect the City to develop technical expertise, as there are other, more specialized resources available.

4. **Water Resources, Action 4.1.** Water is a very important resources for many beneficial uses in and around the City. This is also a very highly regulated space, both for municipal and agricultural uses, especially through the State and Regional Water Boards, not to mention the Basin Adjudication and SGMA. Many of the goals are already being addressed without the need for new programs or policy actions. We discourage the creation of additional layers of regulation or potential policy inconsistencies, as the requirements through other regulatory mechanisms only continue to increase.
5. **5.3 Agricultural air pollutant emissions.** Agriculture continues to advance in its practices, but many of the items identified in this section are beyond the scope of the City and should not be included in the General Plan. Farming practices are best addressed through specific technical expertise and limited by economic and technical feasibility. Action 5.3.3 is already being implemented by the County Agricultural Commissioner, with additional restrictions from CA Department of Pesticide Regulations (DPR), CalEPA, and USEPA. We generally support Action 5.3.4, although its goals are likely best achieved through thoughtful land use planning, especially of prospective annexations and siting of schools. It is also worth noting that vegetative buffers, if immediately adjacent to agricultural operations, can create challenges related to food safety, pests, and diseases.
6. **6.1 Greenhouse Gas Emissions.** Policies should balance what technology and practices are reasonably feasible, cost-effective, and available, and also consider potential impacts to jobs, businesses, and residents.
7. **8.2: Community environmental stewardship.** We believe that 8.2.4, 8.2.6, and 8.2.7 are duplicative of existing efforts and/or are better served by other sectors, rather than creating a new City mandate.

Noise Policy Framework

1. **N2.2 Industrial and agricultural traffic.** We oppose policies that limit routes and times of essential movement of goods, equipment, and people. Many agricultural operations are time-sensitive, and delays in cooling and access to equipment, and especially for fresh produce, are irreversible. We do support policies that facilitate smooth east-west corridors, and opportunities for improved movement could also benefit the noise being generated from multiple users.

Circulation Policy Framework

1. **CIR2.2 Transportation Planning.** We support the City's participation in multi-jurisdictional planning and funding efforts.
2. **CIR 7.2.** We support the City's infill efforts to meet urban needs while reducing pressure to annex agricultural lands.
3. **CIR-8.1: Parking.** As expressed in our comments on the Housing Element, we are concerned with parking policies that could be barriers to the construction or redevelopment of affordable housing, especially in situations where group employee transportation, such as CalVans, is available.

Economic Development Policy Framework

1. **Policy ED-2.1: Business-friendly regulation.** We strongly support the City's dedication to an environment that support business and jobs. We are concerned that some of the policies introduced elsewhere in the frameworks could inadvertently conflict with this important action. We further suggest that efficiency is prioritized for all businesses, including agriculture and supporting businesses, not just ag tech.
2. **Policy ED-2.3: Infill development.** As stated elsewhere, we support infill development as a means to achieve multiple goals.

Health and Environmental Justice Policy Framework

1. We will restate our objections to the use and narrative surrounding CalEnviroScreen 4.0, especially surrounding pesticides. First, pesticide *use* is not the same as *exposure*. Next, the tool uses census tracts, which include agricultural production areas outside of the City limits, which is misleading for the purposes of the City of Santa Maria. Additionally, in many cases, a closer look at the underlying data show that the City’s “population characteristics scores” are almost always higher than the “pollution burden score.” We urge you to reach out to the County Agricultural Commissioner to better understand the difference between use and exposure, as well as the robust and continually evolving regulatory mechanisms and monitoring already in place.
2. We object to the inaccuracies, selective references, and implications made regarding H-2A housing in this Framework. We ask references to H-2A in this Framework be removed to better fulfill the City’s commitment to Fair Housing.
3. **HEJ 1.1.** This policy should also include the importance of citing sensitive sites away from existing and future commercial and industrial operations, and the concerns with the incursion of urban uses into industrial and commercial areas, including agricultural operations. A much deeper discussion on the implementation mechanism is warranted with stakeholders—in some cases, restrictions can be ¼ mile or more, and a 500 foot buffer would be far from adequate.
4. **HEJ 1.5.** This policy is beyond the scope of authority of the City of Santa Maria and duplicative of existing regulations and voluntary efforts. We ask that it be removed.

Land Use Policy Framework

1. **LU-1.1.3: Area 9.** We remain concerned with potential land use conflicts resulting from allowing low density residential development west of A Street in Area 9 that is unrelated to the neighboring industrial and agricultural uses. We are concerned that this would create predictable and significant conflicts for the existing and future industrial and agricultural uses, as well as prospective residents, and this change should be removed.
2. We support LU-1.2 re Infill for the reasons stated in the policy and throughout this letter.
3. **LU-2 Annexation.** We restate our previous objections to the annexation of certain agricultural lands (primarily along Highway 101). Although they are prime farmlands of exceptional quality, in recognition of the need to balance multiple priorities, we do not necessarily oppose the annexation of a limited portion north of Main Street and the block immediately east of Marian Regional Medical Center).
4. **LU 4.1.2 and LU 4.2 Mixed Use.** Preservation and improvement of east-west corridors in and through the City must remain a top priority for the safe and efficient movement of goods, equipment, and people. We are concerned with the scope of the proposed prohibitions on use, especially near but outside of the Downtown Specific Plan area.
5. **LU 6.6 Neighborhood Commercial.** The reductions seem contrary to other policies supportive of infill and an efficient urban footprint listed elsewhere.
6. **Goal LU-9: Agricultural areas.** We support policies that protect active agricultural cultivation and prevent predictable land use conflicts.
7. **Goal LU-13: Land use conflicts.** This goal and implementing policies are of the utmost importance. The type of buffers depend on the neighboring uses—for example, active recreation such as walking and biking, would not be an effective buffer for neighboring agricultural operations. Residential encroachment and incompatible neighborhood uses should also discourage or prohibit the encroachment of residential uses into industrial spaces, including active agricultural operations.

Public Facilities and Services Policy Framework

1. **PFS-5.2: School siting.** We are very concerned with the placement of schools in agricultural areas, as this will create a sensitive site and create numerous conflicts. Such school site placement must be discouraged by the sound planning practices listed throughout the Policy Frameworks. Language on school siting must also include strategic placement and prohibit encroachment to prevent significant land use conflicts, impacts to existing operations, and community discord.
2. **PFS-8 Police.** We have heard feedback from members concerned with response times, especially in the northern portion of the City. We further encourage close collaboration with the County Sheriff's Rural Crime Unit and other law enforcement agencies, as theft and vandalism pose significant hardships and cross jurisdictional boundaries.
3. We are generally supportive of appropriately sited parks and recreation opportunities for our community. However, active recreation is generally not compatible with active agricultural operations. We encourage the policy to include language about appropriate siting to prevent predictable land use conflicts.

Safety Policy Framework

1. **S-3.3: Agricultural runoff reduction.** Agriculture is already regulated under the Regional and State Water Board's Irrigated Lands Regulatory Program. This section contains inaccuracies and is beyond the City's authority and should be deleted.
2. The portions related to flooding and dam operations and releases should be reviewed and updated by Public Works for improved accuracy.
3. **S-4.3.2: City materials usage.** We are concerned that dictating the type of materials might not be as feasible in effectively controlling weeds, pests, and diseases, which could have negative consequences for the City and neighboring agricultural operations. Flexibility in the materials and methods used should be included.
4. **S-8.7.2: Water efficient and conservation.** This is already regulated through the Water Board, SGMA, and basin adjudication and does not need to be included.

Thank you for incorporating these comments and concerns as the City moves forward with next steps in the General Plan update process.

Sincerely,



Claire Wineman
President

Letter 8

COMMENTER: Kelley M. Taber, Attorney at Somach Simmons & Dunn

DATE: September 29, 2025

Response 8.1

The commenter expresses appreciation for the City's consideration of their previous input on the Policy Frameworks. The commenter raises concerns about several proposed policies and actions in the 2045 General Plan Update. Specifically, the commenter objects to policies that could result in the placement of sensitive uses or disadvantaged communities near existing agricultural operations, and to the designation of certain agricultural areas as disadvantaged communities. The commenter also identifies potential regulatory conflicts and operational impediments to agriculture and transportation stemming from the proposed policies. Additionally, the commenter questions whether the Draft EIR adequately addresses the Health and Environmental Justice Element compliance with CEQA.

The concerns raised in this comment primarily relate to the proposed 2045 General Plan Update policies and their potential implications for agricultural operations, land use compatibility, and the designation of disadvantaged communities. The comments related to the 2045 General Plan Update policies do not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, and no changes to the Draft EIR are required in response.

While the 2045 General Plan Update includes policies that address environmental justice priorities, such as minimizing exposure to pollution for disadvantaged communities, the Draft EIR does not include a separate environmental justice chapter. These considerations are incorporated into the 2045 General Plan Update's policy framework and are addressed in the Draft EIR where relevant, such as Section 4.2, *Air Quality and Greenhouse Gas*, Section 4.6, *Noise*, and Section 4.9.5, *Land Use and Planning*. However, for purposes of consistency with the 2045 General Plan Update, this response notes that the City has removed the census tracts referenced by the commenter from the designated disadvantaged communities in the 2045 General Plan Update mapping. No revisions to the Draft EIR are required in response to this comment.

Response 8.2

The commenter objects to the 2045 General Plan Update's identification of certain census tracts, specifically 20.11, 24.09, and 24.10, as disadvantaged communities, arguing that these areas are largely unpopulated and consist primarily of agricultural and industrial operations rather than residential communities. They assert that the use of entire census tracts to define disadvantaged communities is imprecise and inconsistent with Senate Bill 1000 and Government Code section 65302(h), which refer to disadvantaged communities as "areas" without specifying tract boundaries. The commenter warns that misclassifying these areas as disadvantaged communities could lead to inappropriate restrictions on agricultural operations, potentially violating the California Right to Farm Act and the Santa Barbara County Right-to-Farm Ordinance. They request that the City reevaluate these designations and, at minimum, apply a more granular approach using block group data to avoid unintended consequences for agricultural lands and supporting uses.

This comment pertains to specifics within the 2045 General Plan Update and does not raise a question or concern regarding the environmental analysis presented in the Draft EIR. However, for purposes of consistency with the 2045 General Plan Update, this response notes that the City has removed the census tracts referenced by the commenter from the designated disadvantaged communities in the 2045 General Plan Update mapping. As this comment does not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Comments related to policy content will be passed on to decision-makers for their consideration.

Response 8.3

The commenter objects to proposed 2045 General Plan Update policies that would impose new buffers and restrictions on agricultural operations, including COS-5.2.4 and HEJ-1.1, arguing they conflict with existing agricultural protections and CEQA. The commenter opposes additional City regulations on air, water, and pesticide use, stating these are already governed by state and federal agencies. The commenter objects to transportation policies that could impede movement of agricultural goods and oppose annexation of farmland east of U.S. 101 due to unmitigated impacts. The commenter supports limited annexation near Main Street if land use conflicts are minimized. The commenter argues that SB 1000 does not require the level of specificity included in the General Plan's environmental justice policies and actions. The commenter also recommends revising HEJ-1.1 to better reflect land use compatibility.

This comment pertains to specific policies in the 2045 General Plan Update and does not raise a question or concern regarding the environmental analysis presented in the Draft EIR. The commenter's statement that 2045 General Plan Update policies aren't sufficiently evaluated in the environmental review of potential agricultural resource impacts is discussed below in Response 8.4. As this comment does not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response. However, it is important to note that the purpose of a General Plan is to provide a long-term, visionary framework for guiding future growth and development. It establishes goals and policies that reflect community values and aspirations, and often uses flexible language to allow for interpretation based on the context of individual projects.

Comments related to policy content of the 2045 General Plan Update will be passed on to decision-makers for their consideration.

Response 8.4

The commenter asserts that the Draft EIR fails to analyze the environmental impacts of several proposed 2045 General Plan Update policies, particularly those in the Environmental Justice Element. The commenter argues that the omission of analysis for Environmental Justice policies and infrastructure proposals violates CEQA, as these actions could result in significant direct and indirect impacts. The commenter states that the Draft EIR does not address conflicts between disadvantaged communities designations and agricultural zoning, nor does it analyze annexation impacts east of U.S. 101 where prime farmland exists. The commenter requests that the City revise the Draft EIR to include analysis of potential impacts from the General Plan's Environmental Justice policies and actions, as well as annexation policies that could affect agricultural resources, and to identify feasible mitigation measures to reduce those impacts.

The Draft EIR was prepared as a Program EIR pursuant to CEQA Guidelines Section 15168, which is appropriate for evaluating the broad environmental effects of a general plan. As described in Chapter 1, *Introduction*, Subsection 1.1.2 of the EIR (pages 1-2 to 1-3), the Program EIR format allows for comprehensive analysis of cumulative and program-level impacts, with the understanding that future project-specific CEQA review will be conducted as needed for individual developments facilitated by the 2045 General Plan Update. Consistent with CEQA, the Draft EIR is intended to provide decision-makers and the public with information that enables intelligent consideration of the environmental consequences of the plan. The Draft EIR identifies potentially significant environmental effects, discusses feasible mitigation measures, and evaluates alternatives to the proposed plan.

The Environmental Justice Element of the 2045 General Plan Update is addressed in the Draft EIR through its integration into the analysis of relevant environmental topics. For example, Section 4.1, *Agricultural Resources*, and Section 4.2, *Air Quality and Greenhouse Gas Emissions*, evaluate the potential for physical environmental changes resulting from implementation of General Plan policies, including those that may be associated with Environmental Justice objectives. The Draft EIR identifies where impacts may be significant and unavoidable, such as the conversion of agricultural land in annexation areas in Impact AG-1, pages 4.1-9 to 4.1-13 of the Draft EIR, and discusses mitigation measures and policy-level strategies to reduce those impacts to the furthest extent possible. Similarly, as discussed in Impact AQGHG-1 on pages 4.2-21 through 4.2-23 of the Draft EIR, potentially significant impacts related to Air Quality and GHG are identified, such as increased emissions from future development, and includes mitigation measures and policy-level strategies to reduce potential impacts.

Regarding the annexation areas east of U.S. 101, the Draft EIR includes an analysis of land use changes and their potential to impact agricultural resources within Section 4.1, *Agricultural Resources*. As described in Chapter 2, *Project Description*, Subsection 2.6.3, *Annexation*, pages 2-12 to 2-13, the proposed annexation includes approximately 985 acres east of the highway, much of which is currently designated for agricultural use under County zoning and contains Prime Farmland, Unique Farmland, and Williamson Act lands in nonrenewal status. As discussed in Section 4.1, *Agricultural Resources*, Williamson Act lands in the annexation area are all currently in nonrenewal, which starts a countdown to the expiration of the contract. This includes three contracts that are set to expire in January of 2026 (71AP072), 2027 (85AP008) and 2028 (70AP148). The analysis within Section 4.1, *Agricultural Resources*, Subsection 4.1.3, *Impact Analysis*, pages 4.1-9 to 4.1-13, concludes that conversion of Important Farmland and conflicts with agricultural zoning in the plan area, including the annexation area east of U.S. 101, cannot be fully mitigated, even with policies promoting agricultural preservation and conservation easements. Accordingly, impacts to agricultural resources in the annexation areas are identified as significant and unavoidable, and cumulative impacts to farmland conversion would also be significant. Therefore, the Draft EIR does include both analysis of previously evaluated areas and new areas proposed for annexation and identifies significant and unavoidable impacts where appropriate.

No revisions to the Draft EIR are required in response to this comment.

California Department of Transportation

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September 29, 2025

SCH #2025020584
 SB/Var.

Dana Eady
 Planning Division Manager
 City of Santa Maria
 110 South Pine Street Suite 101
 Santa Maria, CA 93442

Re: City of Santa Maria 2045 General Plan Update Draft Environmental Impact Report (DEIR)

Dear Ms. Eady:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Santa Maria 2045 General Plan (General Plan) Update Draft Environmental Impact Report (DEIR). Caltrans' Local Development Review (LDR) branch is the conduit for reviewing projects and plans (i.e., General Plans) that may impact the State Highway System (SHS). Proposed land use developments and local plans, proposed near the SHS, are reviewed to ensure consistency with our mission and statewide planning priorities. To make this vision a reality, California has identified eight priority areas. The California Transportation Plan 2050 Goals include: Safety, Climate, Equity, Accessibility, Quality of Life & Public Health, Economy, Environment, and Infrastructure.

The following comments are based on our review of the August 2025 General Plan DEIR and Circulation Element.

9.1

Project Understanding

The City of Santa Maria is updating their General Plan to reflect the City's vision throughout the year 2045. The planning horizon is approximately twenty years, during which time City decision makers will rely on the General Plan as the basis for making decisions on matters such as land use, transportation, open space, environmental quality, and safety. The local highway network in the City of Santa Maria, consists of the following: US 101, State Route (SR) 166, and SR 135.

General Comments

Caltrans supports the objective: Transportation Innovation – designed to create a balanced, equitable, affordable, and reliable transportation network where pedestrians, cyclists, vehicles, rail, and transit can safely and efficiently navigate to/from their destinations. Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all users and recognizes bicycle, pedestrian, and transit modes as integral parts of the transportation network. Caltrans looks forward to reviewing and providing feedback on land use developments that are proposed in and around the SHS. Early coordination with Caltrans is encouraged.

9.1

Lead Agency

As the Lead Agency, the City of Santa Maria is responsible for all project mitigation, including any needed improvements to the SHS.

Vehicle Miles Traveled (VMT)

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses VMT analysis for land use projects, please refer to the Caltrans [Transportation Impact Study Guide](#).

The project VMT analysis and significance determination are undertaken in a manner consistent with the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA. Per the DEIR, this project is found to have a significant VMT impact with no feasible policies or mitigation measures that could reduce citywide rates of VMT below the 17% reduction target by the horizon year 2045. However, VMT is projected to decrease for both per household and per employee VMT between the existing baseline year and horizon year.

9.2

Caltrans supports both Policy CIR-7.2: Prioritize land use development patterns that reduce VMT and Policy LU-4.3: Mixed-use development. Efficient land use can place housing closer to jobs and amenities creating shorter trips for all users. Denser land use offers an opportunity to connect users to their destinations with an integrated multimodal network featuring transit, shared mobility, biking, walking, and other low-carbon modes. The state supports reducing VMT in ways that increase the likelihood that people will use and benefit from a multimodal transportation network.

No mitigation measures were listed for reducing VMT in the DEIR. Caltrans encourages the City to consider creating a VMT Mitigation Impact Fee programs to help reduce impacts on the SHS. Transportation Demand Management (TDM) Plans and Trip

Reduction Programs should be considered for land development projects with significant and unavoidable impacts to further mitigate VMT. For more information visit Caltrans [Transportation Demand Management Toolbox](#).

9.2

Complete Streets

Caltrans strongly advocates for the planning and implementation of Complete Streets. These streets prioritize the needs of all users, regardless of age or ability, by incorporating high-quality infrastructure for pedestrians, bicyclists, and transit riders. Improvements may include features such as secure bicycle parking, pedestrian-friendly LED lighting, clear wayfinding signage, and seamless connections to nearby active transportation options or transit facilities. Complete Streets contribute to a range of positive outcomes, including improved regional connectivity, enhanced air quality, reduced traffic congestion, better first/last-mile connections for transit users, and overall increased safety for all modes of transportation.

9.3

The following comments are based on the DEIR and Circulation Element.

DEIR Transportation and Traffic 4.7:

- This section is missing a reference to the City's 2019 Downtown Multimodal Streetscape Plan when discussing relevant planning documents.

Santa Maria General Plan Circulation Element:

- Page 17 of the Circulation Element (Figure CIR-2: Bikeway Network) is missing several existing bikeways. For example, the following locations contain bikeway facilities that are missing or incorrect including SR 135 (Broadway) and SR 166 (Main Street).
- Page 17 of the Circulation Element (Figure CIR-2: Bikeway Network) is inconsistent with the Class I facilities proposed in the Recreation and Parks Element (Figure REC-2: Trail System). Please consider adjusting either figure to have consistent bikeway recommendations for Class I shared-use paths within the city limits. Inconsistencies are present in multiple locations such as Union Valley Parkway, the west side of Highway 101 from Betteravia Road to Battles Road, Foxenwood Lane, Pioneer Park region, South Miller Street, Santa Maria Way, Sunrise Drive, Blosser Road, La Brea Avenue, Blosser Road, Grogan Park region, Preisker Park region, Suey Road, and Panther Road.
- Page 20 of the Circulation Element, please include Main Street as a Pedestrian Priority Improvement Network to be consistent with the 2019 Downtown Multimodal Streetscape Plan.

9.4

Encroachment Permits

Please be aware that if any future work is completed in the State's right-of-way it will require an encroachment 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 encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditions and requirements. Project Oversight maybe needed depending on the complexity of the project. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at:
<https://dot.ca.gov/programs/traffic-operations/ep>.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Should you have any questions or need further clarification on the items discussed above, please contact me at (805) 888-1508 or email christopher.bjornstad@dot.ca.gov.

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
District 5 Development Review

CC: Veronica Lezama, Branch Chief – Regional Planning & Local Development Review (South)

9.5

Letter 9

COMMENTER: Chris Bjornstad, Associate Transportation Planner with Caltrans District 5

DATE: September 29, 2025

Response 9.1

The commenter summarizes the role of the California Department of Transportation in reviewing local plans that may affect the State Highway System and expresses general support for the 2045 General Plan Update's transportation objectives.

The information summarized by the commenter is included in Chapter 2, *Project Description*, pages 2-1 to 2-8, of the Draft EIR, which includes a discussion of the Circulation Element and its emphasis on multimodal transportation. Additional context is provided in Chapter 3, *Environmental Setting*, Section 3.1, *Setting*, page 3-1, which outlines the regional transportation context including U.S. 101, SR 166, and SR 135. No revisions to the Draft EIR are required in response to this comment.

Response 9.2

The commenter summarizes Caltrans' approach to evaluating vehicle miles traveled impacts and states that the Draft EIR identifies a significant VMT impact with no feasible mitigation to meet the 17 percent reduction target by 2045, though they state VMT per household and per employee is projected to decrease. The commenter expresses support for General Plan policies and encourages the City to consider VMT mitigation strategies such as a VMT mitigation fee program, Transportation Demand Management plans, and trip reduction programs.

This information is discussed in Section 4.7, *Transportation and Traffic*, pages 4.7-1 to 4.7-18, which presents the VMT analysis and identifies a significant and unavoidable impact due to the inability to meet the 17 percent reduction target by 2045. Related policies are described in Subsection 4.7.3, *Impact Analysis*, pages 4.7-8 to 4.7-14, which explain how land use strategies such as mixed-use and infill development are intended to reduce VMT. No revisions to the Draft EIR are required in response to this comment.

Response 9.3

The commenter summarizes Caltrans' support for Complete Streets and states that the Draft EIR Section 4.7, Transportation and Traffic, does not reference the City's 2019 Downtown Multimodal Streetscape Plan.

The commenter is correct that the Draft EIR does not currently reference the City's 2019 Downtown Multimodal Streetscape Plan when discussing relevant planning documents in Section 4.7, *Transportation and Traffic*, pages 4.7-7 through 4.7-8. A reference to this plan has been added to the Final EIR in Section 4.7, *Transportation and Traffic*, Subsection 4.7.2.c, *Local Regulations*, pages 4.7-7 through 4.7-8. The language within the Regulatory Setting discussion on pages 4.7-7 through 4.7-8 has been revised in the Final EIR to incorporate the following underlined language:

Santa Maria Regional (formerly Area) Transit Short Range Transit Plan Update

In 2018, the City of Santa Maria hired a consultant to update to its Short Range Transit Plan. This plan is the guiding document for the City's public transit program. Before this update, the most recent full update was completed in 2008, with a subsequent update in 2015 that focused on Santa Maria Regional Transit's (SMRT's) evening service and fare policy. In 2021 the City prepared an Addendum to the Short Range Transit Plan incorporating post-COVID route and schedule revisions. The current Short Range Transit Plan includes a series of service recommendations in four categories: performance improvement, service enhancement, policy, and innovation/technology.

Santa Maria Downtown Multimodal Streetscape Plan

The Downtown Multimodal Streetscape Plan was adopted in January 2019 to guide the transformation of Santa Maria's Downtown streets into vibrant, multimodal corridors. Funded through a Caltrans Sustainable Communities Grant, the plan builds on the City's Downtown Specific Plan and Caltrans' Main Street, California program to promote Complete Streets principles. The plan provides conceptual design guidance for Broadway and Main Street, aiming to improve safety, walkability, and livability while accommodating all users—pedestrians, bicyclists, transit riders, and vehicles. Key goals include reducing lane widths, adding bike facilities, widening sidewalks, and enhancing intersections with traffic calming and landscaping. The plan emphasizes community engagement and reflects input from extensive public outreach, prioritizing beautification, connectivity, and economic revitalization. While the plan does not constitute final design approval, it establishes a framework for future engineering and implementation phases in partnership with Caltrans and identifies potential funding strategies for phased improvements.

The addition of the summary of the Santa Maria Downtown Multimodal Streetscape Plan into Section 4.7, *Transportation and Traffic*, Subsection 4.7.2.c, *Local Regulations*, does not change the environmental analysis or conclusions in the Draft EIR. In addition to this reference, acknowledging the 2045 General Plan Update's compliance with the 2019 Downtown Multimodal Streetscape Plan, the Draft EIR also discusses multimodal transportation planning and related policies in Section 4.7, *Transportation and Traffic*, Subsection 4.7.3, *Impact Analysis*, pages 4.7-8 to 4.7-14, including policies that support pedestrian, bicycle, and transit infrastructure. The Draft EIR describes applicable local planning documents such as the 2020 City of Santa Maria Active Transportation Plan in Subsection 4.7.2.c, *Local Regulations*, pages 4.7-7 through 4.7-8.

Response 9.4

The commenter summarizes concerns related to the bikeway and pedestrian network mapping in the General Plan Circulation Element. Specifically, they note that Figure CIR-2 (Bikeway Network, page 17 of the Circulation Element) omits existing bikeways along SR 135 (Broadway) and SR 166 (Main Street), and is inconsistent with Class I shared-use path recommendations shown in Figure REC-2 (Trail System) of the Recreation and Parks Element. They also suggest that Main Street be included in the Pedestrian Priority Improvement Network to align with the 2019 Downtown Multimodal Streetscape Plan.

This comment pertains to the 2045 General Plan Update and does not raise a question or concern regarding the environmental analysis presented in the Draft EIR. The figure referenced by the commenter appears in the 2045 General Plan Update Circulation Element but does not appear in the EIR. As this comment does not identify a new significant impact, provide substantial evidence of a deficiency in the environmental analysis, or propose feasible mitigation measures, no changes to the Draft EIR are required in response.

Comments related to the 2045 General Plan Update will be passed on to decision-makers for their consideration. No revisions to the Draft EIR are required in response to this comment.

Response 9.5

The commenter summarizes standard requirements for future work within the State's right-of-way, noting that such work will require an encroachment permit from Caltrans and must meet Caltrans engineering and environmental standards. The commenter also states that any impacted Caltrans facilities must comply with ADA standards and maintain bicycle and pedestrian access during construction to support equitable access.

The commenter is correct that future work within the State's right-of-way would be required to comply with Caltrans procedures, permitting, and standards. This comment does not raise specific concerns or recommendations related to the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

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