FINAL ENVIRONMENTAL ASSESSMENT

SANTA YNEZ BAND OF CHUMASH INDIANS
CAMP 4 FEE-TO-TRUST

VOLUME II

MAY 2014

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825-1846

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TABLE OF CONTENTS

SANTA YNEZ BAND OF CHUMASH INDIANS
CAMP 4 FEE-TO-TRUST
FINAL ENVIRONMENTAL ASSESSMENT – VOLUME II

VOLUME I – ENVIRONMENTAL ASSESSMENT

(BOUND UNDER SEPARATE COVER)

VOLUME II – UPDATED/NEW APPENDICES

APPENDICES

APPENDIX B

AIR EMISSIONS MODEL OUTPUT (REVISED)

Chumash Camp 4, Alt A

Santa Barbara County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	143.00	Dwelling Unit	715.00	286,000.00	374

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.9	**Precipitation Freq (Days)**	37
Climate Zone	4			**Operational Year**	2025
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot size is 5 acres. 2.61 persons per dwelling unit. Square footage based on 2,000 square feet residential units.

Construction Phase - Construction will begin in 2023 and last for four years.

Off-road Equipment - Additional paving will be needed for Tribal Hall parking.

Trips and VMT - Trip lenth is estimated to be 15 miles. Grading trips are consistent with the noise analysis.

Grading - Conservative estimate of disturbed land based on lot size, includes infrustructure.

Vehicle Trips - Trip Rate consistent with TIA and trip percentage default consistent with the ITE Manual.

Woodstoves - Now woodfired combustion units will be installed.

Water And Wastewater - Based on 335 acre feet per year, Section 4.1.2.

Solid Waste - Per Public Service Section.

Construction Off-road Equipment Mitigation - Clean paved roadways adjacent to soil haul route entrance twice a day.

Mobile Land Use Mitigation -

Area Mitigation -

Energy Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	880.00	1,012.00
tblConstructionPhase	NumDays	12,400.00	1,012.00
tblConstructionPhase	NumDays	1,240.00	753.00
tblConstructionPhase	NumDays	880.00	990.00
tblConstructionPhase	NumDays	480.00	390.00
tblConstructionPhase	PhaseEndDate	10/17/2030	12/31/2026
tblConstructionPhase	PhaseEndDate	5/16/2028	12/1/2026
tblConstructionPhase	PhaseEndDate	11/20/2029	1/31/2026
tblConstructionPhase	PhaseEndDate	9/17/2030	12/1/2026
tblConstructionPhase	PhaseEndDate	6/28/2024	6/30/2024

tblConstructionPhase	PhaseStartDate	12/2/2026	2/15/2023
tblConstructionPhase	PhaseStartDate	7/1/2024	1/15/2023
tblConstructionPhase	PhaseStartDate	1/1/2027	3/15/2023
tblConstructionPhase	PhaseStartDate	12/2/2026	2/15/2023
tblGrading	AcresOfGrading	1,882.50	3,100.00
tblGrading	MaterialImported	0.00	10,000.00
tblLandUse	LandUseSquareFeet	257,400.00	286,000.00
tblLandUse	LotAcreage	46.43	715.00
tblLandUse	Population	389.00	374.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	5.00
tblProjectCharacteristics	OperationalYear	2014	2025
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	153.34	157.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripNumber	1,250.00	770.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00

tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblVehicleTrips	ST_TR	10.08	9.57
tblVehicleTrips	SU_TR	8.77	9.57
tblWater	IndoorWaterUseRate	9,317,025.66	66,526,740.00
tblWater	OutdoorWaterUseRate	5,873,777.05	42,533,490.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	2.3994	11.3724	12.9088	0.0220	7.6316	0.5259	8.1575	3.4132	0.4863	3.8995	0.0000	1,876.3190	1,876.3190	0.5145	0.0000	1,887.1224
2024	2.4291	9.9642	12.2802	0.0220	7.6370	0.4492	8.0862	3.4147	0.4156	3.8303	0.0000	1,878.0127	1,878.0127	0.5090	0.0000	1,888.7022
2025	2.1396	7.1436	10.0780	0.0193	4.1003	0.3131	4.4134	1.4746	0.2900	1.7646	0.0000	1,638.0541	1,638.0541	0.4339	0.0000	1,647.1660
2026	1.6921	3.5455	5.6660	0.0105	4.0557	0.1574	4.2131	1.4625	0.1467	1.6092	0.0000	875.6081	875.6081	0.2061	0.0000	879.9355
Total	**8.6602**	**32.0257**	**40.9330**	**0.0738**	**23.4246**	**1.4456**	**24.8702**	**9.7650**	**1.3386**	**11.1036**	**0.0000**	**6,267.9940**	**6,267.9940**	**1.6634**	**0.0000**	**6,302.9261**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	2.3980	11.3592	12.8945	0.0220	8.4018	0.5253	8.9271	3.6023	0.4857	4.0880	0.0000	1,874.3279	1,874.3279	0.5138	0.0000	1,885.1186
2024	2.4279	9.9526	12.2667	0.0220	8.6081	0.4487	9.0568	3.6531	0.4151	4.0682	0.0000	1,876.0308	1,876.0308	0.5084	0.0000	1,886.7077
2025	2.1387	7.1354	10.0670	0.0193	5.0677	0.3127	5.3805	1.7120	0.2897	2.0017	0.0000	1,636.3452	1,636.3452	0.4334	0.0000	1,645.4463
2026	1.6916	3.5415	5.6599	0.0105	4.1338	0.1572	4.2910	1.4817	0.1465	1.6282	0.0000	874.7403	874.7403	0.2058	0.0000	879.0627
Total	**8.6563**	**31.9887**	**40.8881**	**0.0737**	**26.2115**	**1.4439**	**27.6555**	**10.4491**	**1.3370**	**11.7861**	**0.0000**	**6,261.4442**	**6,261.4442**	**1.6615**	**0.0000**	**6,296.3352**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.05**	**0.12**	**0.11**	**0.11**	**-11.90**	**0.12**	**-11.20**	**-7.01**	**0.12**	**-6.15**	**0.00**	**0.10**	**0.10**	**0.12**	**0.00**	**0.10**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.5962	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.8431	1.3007	6.5063	0.0191	1.4252	0.0209	1.4461	0.3817	0.0193	0.4010	0.0000	1,279.6341	1,279.6341	0.0439	0.0000	1,280.5552
Waste						0.0000	0.0000		0.0000	0.0000	31.8696	0.0000	31.8696	1.8834	0.0000	71.4218
Water						0.0000	0.0000		0.0000	0.0000	23.5373	148.0284	171.5657	0.0877	0.0526	189.7044
Total	**3.4665**	**1.5454**	**7.6660**	**0.0207**	**1.4252**	**0.0456**	**1.4708**	**0.3817**	**0.0440**	**0.4257**	**55.4068**	**1,992.8787**	**2,048.2856**	**2.0351**	**0.0603**	**2,109.7038**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.5962	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.8431	1.3007	6.5063	0.0191	1.4252	0.0209	1.4461	0.3817	0.0193	0.4010	0.0000	1,279.6341	1,279.6341	0.0439	0.0000	1,280.5552
Waste						0.0000	0.0000		0.0000	0.0000	31.8696	0.0000	31.8696	1.8834	0.0000	71.4218
Water						0.0000	0.0000		0.0000	0.0000	23.5373	148.0284	171.5657	0.0873	0.0525	189.6669
Total	**3.4665**	**1.5454**	**7.6660**	**0.0207**	**1.4252**	**0.0456**	**1.4708**	**0.3817**	**0.0440**	**0.4257**	**55.4068**	**1,992.8787**	**2,048.2856**	**2.0347**	**0.0602**	**2,109.6663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.15**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	6/30/2024	5	390	
2	Building Construction	Building Construction	1/15/2023	12/1/2026	5	1012	
3	Paving	Paving	2/15/2023	12/1/2026	5	990	
4	Architectural Coating	Architectural Coating	2/15/2023	12/31/2026	5	1012	
5	Grading	Grading	3/15/2023	1/31/2026	5	753	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 3100

Acres of Paving: 0

Residential Indoor: 579,150; Residential Outdoor: 193,050; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	Cranes	1	7.00	226	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	125	0.42
Paving	Paving Equipment	5	8.00	130	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Grading	Excavators	2	8.00	162	0.38
Grading	Graders	1	8.00	174	0.41
Grading	Rubber Tired Dozers	1	8.00	255	0.40
Grading	Scrapers	2	8.00	361	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	51.00	15.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Paving	9	23.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	10.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	4.00	770.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3920	3.8915	3.7465	5.0900e-003		0.1808	0.1808		0.1663	0.1663	0.0000	447.4362	447.4362	0.1447	0.0000	450.4751
Total	**0.3920**	**3.8915**	**3.7465**	**5.0900e-003**	**3.5229**	**0.1808**	**3.7037**	**1.9365**	**0.1663**	**2.1028**	**0.0000**	**447.4362**	**447.4362**	**0.1447**	**0.0000**	**450.4751**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0302	0.0107	0.0863	2.8000e-004	0.0261	1.6000e-004	0.0263	6.9300e-003	1.5000e-004	7.0800e-003	0.0000	17.4706	17.4706	8.0000e-004	0.0000	17.4874
Total	**0.0302**	**0.0107**	**0.0863**	**2.8000e-004**	**0.0261**	**1.6000e-004**	**0.0263**	**6.9300e-003**	**1.5000e-004**	**7.0800e-003**	**0.0000**	**17.4706**	**17.4706**	**8.0000e-004**	**0.0000**	**17.4874**

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3916	3.8868	3.7421	5.0800e-003		0.1806	0.1806		0.1661	0.1661	0.0000	446.9039	446.9039	0.1445	0.0000	449.9392
Total	**0.3916**	**3.8868**	**3.7421**	**5.0800e-003**	**3.5229**	**0.1806**	**3.7035**	**1.9365**	**0.1661**	**2.1026**	**0.0000**	**446.9039**	**446.9039**	**0.1445**	**0.0000**	**449.9392**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0302	0.0107	0.0863	2.8000e-004	0.0261	1.6000e-004	0.0263	6.9300e-003	1.5000e-004	7.0800e-003	0.0000	17.4706	17.4706	8.0000e-004	0.0000	17.4874
Total	**0.0302**	**0.0107**	**0.0863**	**2.8000e-004**	**0.0261**	**1.6000e-004**	**0.0263**	**6.9300e-003**	**1.5000e-004**	**7.0800e-003**	**0.0000**	**17.4706**	**17.4706**	**8.0000e-004**	**0.0000**	**17.4874**

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1836	1.7904	1.7941	2.5500e-003		0.0812	0.0812		0.0747	0.0747	0.0000	223.7394	223.7394	0.0724	0.0000	225.2590
Total	**0.1836**	**1.7904**	**1.7941**	**2.5500e-003**	**3.5229**	**0.0812**	**3.6042**	**1.9365**	**0.0747**	**2.0112**	**0.0000**	**223.7394**	**223.7394**	**0.0724**	**0.0000**	**225.2590**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0146	5.0300e-003	0.0407	1.4000e-004	0.0131	8.0000e-005	0.0131	3.4700e-003	8.0000e-005	3.5400e-003	0.0000	8.6245	8.6245	3.9000e-004	0.0000	8.6326
Total	**0.0146**	**5.0300e-003**	**0.0407**	**1.4000e-004**	**0.0131**	**8.0000e-005**	**0.0131**	**3.4700e-003**	**8.0000e-005**	**3.5400e-003**	**0.0000**	**8.6245**	**8.6245**	**3.9000e-004**	**0.0000**	**8.6326**

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1833	1.7883	1.7920	2.5400e-003		0.0811	0.0811		0.0747	0.0747	0.0000	223.4732	223.4732	0.0723	0.0000	224.9910
Total	**0.1833**	**1.7883**	**1.7920**	**2.5400e-003**	**3.5229**	**0.0811**	**3.6041**	**1.9365**	**0.0747**	**2.0111**	**0.0000**	**223.4732**	**223.4732**	**0.0723**	**0.0000**	**224.9910**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0146	5.0300e-003	0.0407	1.4000e-004	0.0131	8.0000e-005	0.0131	3.4700e-003	8.0000e-005	3.5400e-003	0.0000	8.6245	8.6245	3.9000e-004	0.0000	8.6326
Total	**0.0146**	**5.0300e-003**	**0.0407**	**1.4000e-004**	**0.0131**	**8.0000e-005**	**0.0131**	**3.4700e-003**	**8.0000e-005**	**3.5400e-003**	**0.0000**	**8.6245**	**8.6245**	**3.9000e-004**	**0.0000**	**8.6326**

3.3 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1958	1.7891	2.0262	3.3500e-003		0.0871	0.0871		0.0820	0.0820	0.0000	288.5558	288.5558	0.0685	0.0000	289.9951
Total	**0.1958**	**1.7891**	**2.0262**	**3.3500e-003**		**0.0871**	**0.0871**		**0.0820**	**0.0820**	**0.0000**	**288.5558**	**288.5558**	**0.0685**	**0.0000**	**289.9951**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0417	0.1261	0.2649	8.6000e-004	0.0249	3.0100e-003	0.0279	7.0900e-003	2.7700e-003	9.8500e-003	0.0000	72.7065	72.7065	4.5000e-004	0.0000	72.7160
Worker	0.0823	0.0291	0.2351	7.7000e-004	0.0711	4.4000e-004	0.0716	0.0189	4.1000e-004	0.0193	0.0000	47.5962	47.5962	2.1800e-003	0.0000	47.6420
Total	**0.1240**	**0.1552**	**0.5000**	**1.6300e-003**	**0.0960**	**3.4500e-003**	**0.0994**	**0.0260**	**3.1800e-003**	**0.0292**	**0.0000**	**120.3028**	**120.3028**	**2.6300e-003**	**0.0000**	**120.3581**

3.3 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1955	1.7870	2.0238	3.3500e-003		0.0870	0.0870		0.0819	0.0819	0.0000	288.2125	288.2125	0.0685	0.0000	289.6501
Total	**0.1955**	**1.7870**	**2.0238**	**3.3500e-003**		**0.0870**	**0.0870**		**0.0819**	**0.0819**	**0.0000**	**288.2125**	**288.2125**	**0.0685**	**0.0000**	**289.6501**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0417	0.1261	0.2649	8.6000e-004	0.0249	3.0100e-003	0.0279	7.0900e-003	2.7700e-003	9.8500e-003	0.0000	72.7065	72.7065	4.5000e-004	0.0000	72.7160
Worker	0.0823	0.0291	0.2351	7.7000e-004	0.0711	4.4000e-004	0.0716	0.0189	4.1000e-004	0.0193	0.0000	47.5962	47.5962	2.1800e-003	0.0000	47.6420
Total	**0.1240**	**0.1552**	**0.5000**	**1.6300e-003**	**0.0960**	**3.4500e-003**	**0.0994**	**0.0260**	**3.1800e-003**	**0.0292**	**0.0000**	**120.3028**	**120.3028**	**2.6300e-003**	**0.0000**	**120.3581**

3.3 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1920	1.7524	2.1135	3.5200e-003		0.0800	0.0800		0.0752	0.0752	0.0000	302.4646	302.4646	0.0714	0.0000	303.9643
Total	**0.1920**	**1.7524**	**2.1135**	**3.5200e-003**		**0.0800**	**0.0800**		**0.0752**	**0.0752**	**0.0000**	**302.4646**	**302.4646**	**0.0714**	**0.0000**	**303.9643**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0417	0.1306	0.2674	9.0000e-004	0.0261	3.1700e-003	0.0292	7.4300e-003	2.9200e-003	0.0104	0.0000	76.2432	76.2432	4.8000e-004	0.0000	76.2533
Worker	0.0834	0.0287	0.2327	8.0000e-004	0.0745	4.6000e-004	0.0750	0.0198	4.3000e-004	0.0202	0.0000	49.2482	49.2482	2.2000e-003	0.0000	49.2944
Total	**0.1252**	**0.1593**	**0.5000**	**1.7000e-003**	**0.1006**	**3.6300e-003**	**0.1042**	**0.0272**	**3.3500e-003**	**0.0306**	**0.0000**	**125.4914**	**125.4914**	**2.6800e-003**	**0.0000**	**125.5477**

3.3 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1917	1.7504	2.1109	3.5100e-003		0.0799	0.0799		0.0752	0.0752	0.0000	302.1048	302.1048	0.0713	0.0000	303.6027
Total	**0.1917**	**1.7504**	**2.1109**	**3.5100e-003**		**0.0799**	**0.0799**		**0.0752**	**0.0752**	**0.0000**	**302.1048**	**302.1048**	**0.0713**	**0.0000**	**303.6027**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0417	0.1306	0.2674	9.0000e-004	0.0261	3.1700e-003	0.0292	7.4300e-003	2.9200e-003	0.0104	0.0000	76.2432	76.2432	4.8000e-004	0.0000	76.2533
Worker	0.0834	0.0287	0.2327	8.0000e-004	0.0745	4.6000e-004	0.0750	0.0198	4.3000e-004	0.0202	0.0000	49.2482	49.2482	2.2000e-003	0.0000	49.2944
Total	**0.1252**	**0.1593**	**0.5000**	**1.7000e-003**	**0.1006**	**3.6300e-003**	**0.1042**	**0.0272**	**3.3500e-003**	**0.0306**	**0.0000**	**125.4914**	**125.4914**	**2.6800e-003**	**0.0000**	**125.5477**

3.3 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1777	1.6195	2.0948	3.5000e-003		0.0685	0.0685		0.0645	0.0645	0.0000	301.4019	301.4019	0.0707	0.0000	302.8874
Total	**0.1777**	**1.6195**	**2.0948**	**3.5000e-003**		**0.0685**	**0.0685**		**0.0645**	**0.0645**	**0.0000**	**301.4019**	**301.4019**	**0.0707**	**0.0000**	**302.8874**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0411	0.1288	0.2618	8.9000e-004	0.0260	3.1800e-003	0.0292	7.4000e-003	2.9200e-003	0.0103	0.0000	76.0184	76.0184	4.8000e-004	0.0000	76.0285
Worker	0.0810	0.0272	0.2208	8.0000e-004	0.0742	4.6000e-004	0.0747	0.0197	4.3000e-004	0.0202	0.0000	48.4952	48.4952	2.1200e-003	0.0000	48.5398
Total	**0.1220**	**0.1560**	**0.4826**	**1.6900e-003**	**0.1002**	**3.6400e-003**	**0.1039**	**0.0271**	**3.3500e-003**	**0.0305**	**0.0000**	**124.5136**	**124.5136**	**2.6000e-003**	**0.0000**	**124.5683**

3.3 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1775	1.6175	2.0923	3.5000e-003		0.0684	0.0684		0.0644	0.0644	0.0000	301.0433	301.0433	0.0707	0.0000	302.5271
Total	**0.1775**	**1.6175**	**2.0923**	**3.5000e-003**		**0.0684**	**0.0684**		**0.0644**	**0.0644**	**0.0000**	**301.0433**	**301.0433**	**0.0707**	**0.0000**	**302.5271**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0411	0.1288	0.2618	8.9000e-004	0.0260	3.1800e-003	0.0292	7.4000e-003	2.9200e-003	0.0103	0.0000	76.0184	76.0184	4.8000e-004	0.0000	76.0285
Worker	0.0810	0.0272	0.2208	8.0000e-004	0.0742	4.6000e-004	0.0747	0.0197	4.3000e-004	0.0202	0.0000	48.4952	48.4952	2.1200e-003	0.0000	48.5398
Total	**0.1220**	**0.1560**	**0.4826**	**1.6900e-003**	**0.1002**	**3.6400e-003**	**0.1039**	**0.0271**	**3.3500e-003**	**0.0305**	**0.0000**	**124.5136**	**124.5136**	**2.6000e-003**	**0.0000**	**124.5683**

3.3 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1627	1.4830	1.9182	3.2100e-003		0.0627	0.0627		0.0590	0.0590	0.0000	275.9964	275.9964	0.0648	0.0000	277.3567
Total	**0.1627**	**1.4830**	**1.9182**	**3.2100e-003**		**0.0627**	**0.0627**		**0.0590**	**0.0590**	**0.0000**	**275.9964**	**275.9964**	**0.0648**	**0.0000**	**277.3567**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0369	0.1162	0.2308	8.2000e-004	0.0238	2.8900e-003	0.0267	6.7800e-003	2.6600e-003	9.4500e-003	0.0000	69.6515	69.6515	4.4000e-004	0.0000	69.6606
Worker	0.0723	0.0237	0.1897	7.3000e-004	0.0680	4.2000e-004	0.0684	0.0181	3.9000e-004	0.0185	0.0000	43.6526	43.6526	1.8500e-003	0.0000	43.6914
Total	**0.1093**	**0.1399**	**0.4205**	**1.5500e-003**	**0.0918**	**3.3100e-003**	**0.0951**	**0.0248**	**3.0500e-003**	**0.0279**	**0.0000**	**113.3041**	**113.3041**	**2.2900e-003**	**0.0000**	**113.3520**

3.3 Building Construction - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1625	1.4812	1.9159	3.2000e-003		0.0627	0.0627		0.0590	0.0590	0.0000	275.6680	275.6680	0.0647	0.0000	277.0267
Total	**0.1625**	**1.4812**	**1.9159**	**3.2000e-003**		**0.0627**	**0.0627**		**0.0590**	**0.0590**	**0.0000**	**275.6680**	**275.6680**	**0.0647**	**0.0000**	**277.0267**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0369	0.1162	0.2308	8.2000e-004	0.0238	2.8900e-003	0.0267	6.7800e-003	2.6600e-003	9.4500e-003	0.0000	69.6515	69.6515	4.4000e-004	0.0000	69.6606
Worker	0.0723	0.0237	0.1897	7.3000e-004	0.0680	4.2000e-004	0.0684	0.0181	3.9000e-004	0.0185	0.0000	43.6526	43.6526	1.8500e-003	0.0000	43.6914
Total	**0.1093**	**0.1399**	**0.4205**	**1.5500e-003**	**0.0918**	**3.3100e-003**	**0.0951**	**0.0248**	**3.0500e-003**	**0.0279**	**0.0000**	**113.3041**	**113.3041**	**2.2900e-003**	**0.0000**	**113.3520**

3.4 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1730	1.6797	2.4896	3.9200e-003		0.0834	0.0834		0.0767	0.0767	0.0000	343.9806	343.9806	0.1113	0.0000	346.3168
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1730**	**1.6797**	**2.4896**	**3.9200e-003**		**0.0834**	**0.0834**		**0.0767**	**0.0767**	**0.0000**	**343.9806**	**343.9806**	**0.1113**	**0.0000**	**346.3168**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0338	0.0120	0.0967	3.2000e-004	0.0293	1.8000e-004	0.0294	7.7700e-003	1.7000e-004	7.9400e-003	0.0000	19.5761	19.5761	9.0000e-004	0.0000	19.5949
Total	**0.0338**	**0.0120**	**0.0967**	**3.2000e-004**	**0.0293**	**1.8000e-004**	**0.0294**	**7.7700e-003**	**1.7000e-004**	**7.9400e-003**	**0.0000**	**19.5761**	**19.5761**	**9.0000e-004**	**0.0000**	**19.5949**

3.4 Paving - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1728	1.6777	2.4867	3.9100e-003		0.0833	0.0833		0.0766	0.0766	0.0000	343.5714	343.5714	0.1111	0.0000	345.9048
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1728**	**1.6777**	**2.4867**	**3.9100e-003**		**0.0833**	**0.0833**		**0.0766**	**0.0766**	**0.0000**	**343.5714**	**343.5714**	**0.1111**	**0.0000**	**345.9048**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0338	0.0120	0.0967	3.2000e-004	0.0293	1.8000e-004	0.0294	7.7700e-003	1.7000e-004	7.9400e-003	0.0000	19.5761	19.5761	9.0000e-004	0.0000	19.5949
Total	**0.0338**	**0.0120**	**0.0967**	**3.2000e-004**	**0.0293**	**1.8000e-004**	**0.0294**	**7.7700e-003**	**1.7000e-004**	**7.9400e-003**	**0.0000**	**19.5761**	**19.5761**	**9.0000e-004**	**0.0000**	**19.5949**

3.4 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1907	1.8033	2.8713	4.5000e-003		0.0882	0.0882		0.0812	0.0812	0.0000	395.2716	395.2716	0.1278	0.0000	397.9562
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1907**	**1.8033**	**2.8713**	**4.5000e-003**		**0.0882**	**0.0882**		**0.0812**	**0.0812**	**0.0000**	**395.2716**	**395.2716**	**0.1278**	**0.0000**	**397.9562**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0376	0.0130	0.1049	3.6000e-004	0.0336	2.1000e-004	0.0338	8.9300e-003	1.9000e-004	9.1200e-003	0.0000	22.2100	22.2100	9.9000e-004	0.0000	22.2308
Total	**0.0376**	**0.0130**	**0.1049**	**3.6000e-004**	**0.0336**	**2.1000e-004**	**0.0338**	**8.9300e-003**	**1.9000e-004**	**9.1200e-003**	**0.0000**	**22.2100**	**22.2100**	**9.9000e-004**	**0.0000**	**22.2308**

3.4 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1905	1.8012	2.8679	4.5000e-003		0.0881	0.0881		0.0811	0.0811	0.0000	394.8013	394.8013	0.1277	0.0000	397.4828
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1905**	**1.8012**	**2.8679**	**4.5000e-003**		**0.0881**	**0.0881**		**0.0811**	**0.0811**	**0.0000**	**394.8013**	**394.8013**	**0.1277**	**0.0000**	**397.4828**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0376	0.0130	0.1049	3.6000e-004	0.0336	2.1000e-004	0.0338	8.9300e-003	1.9000e-004	9.1200e-003	0.0000	22.2100	22.2100	9.9000e-004	0.0000	22.2308
Total	**0.0376**	**0.0130**	**0.1049**	**3.6000e-004**	**0.0336**	**2.1000e-004**	**0.0338**	**8.9300e-003**	**1.9000e-004**	**9.1200e-003**	**0.0000**	**22.2100**	**22.2100**	**9.9000e-004**	**0.0000**	**22.2308**

3.4 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1737	1.5866	2.8451	4.4800e-003		0.0777	0.0777		0.0715	0.0715	0.0000	393.6181	393.6181	0.1273	0.0000	396.2915
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1737**	**1.5866**	**2.8451**	**4.4800e-003**		**0.0777**	**0.0777**		**0.0715**	**0.0715**	**0.0000**	**393.6181**	**393.6181**	**0.1273**	**0.0000**	**396.2915**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0123	0.0996	3.6000e-004	0.0335	2.1000e-004	0.0337	8.8900e-003	1.9000e-004	9.0900e-003	0.0000	21.8704	21.8704	9.6000e-004	0.0000	21.8905
Total	**0.0365**	**0.0123**	**0.0996**	**3.6000e-004**	**0.0335**	**2.1000e-004**	**0.0337**	**8.8900e-003**	**1.9000e-004**	**9.0900e-003**	**0.0000**	**21.8704**	**21.8704**	**9.6000e-004**	**0.0000**	**21.8905**

3.4 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1735	1.5848	2.8418	4.4800e-003		0.0777	0.0777		0.0714	0.0714	0.0000	393.1499	393.1499	0.1272	0.0000	395.8201
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1735**	**1.5848**	**2.8418**	**4.4800e-003**		**0.0777**	**0.0777**		**0.0714**	**0.0714**	**0.0000**	**393.1499**	**393.1499**	**0.1272**	**0.0000**	**395.8201**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0123	0.0996	3.6000e-004	0.0335	2.1000e-004	0.0337	8.8900e-003	1.9000e-004	9.0900e-003	0.0000	21.8704	21.8704	9.6000e-004	0.0000	21.8905
Total	**0.0365**	**0.0123**	**0.0996**	**3.6000e-004**	**0.0335**	**2.1000e-004**	**0.0337**	**8.8900e-003**	**1.9000e-004**	**9.0900e-003**	**0.0000**	**21.8704**	**21.8704**	**9.6000e-004**	**0.0000**	**21.8905**

3.4 Paving - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1591	1.4529	2.6053	4.1000e-003		0.0712	0.0712		0.0655	0.0655	0.0000	360.4396	360.4396	0.1166	0.0000	362.8876
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1591**	**1.4529**	**2.6053**	**4.1000e-003**		**0.0712**	**0.0712**		**0.0655**	**0.0655**	**0.0000**	**360.4396**	**360.4396**	**0.1166**	**0.0000**	**362.8876**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0326	0.0107	0.0856	3.3000e-004	0.0307	1.9000e-004	0.0309	8.1400e-003	1.7000e-004	8.3200e-003	0.0000	19.6865	19.6865	8.3000e-004	0.0000	19.7039
Total	**0.0326**	**0.0107**	**0.0856**	**3.3000e-004**	**0.0307**	**1.9000e-004**	**0.0309**	**8.1400e-003**	**1.7000e-004**	**8.3200e-003**	**0.0000**	**19.6865**	**19.6865**	**8.3000e-004**	**0.0000**	**19.7039**

3.4 Paving - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1589	1.4512	2.6022	4.1000e-003		0.0711	0.0711		0.0654	0.0654	0.0000	360.0108	360.0108	0.1164	0.0000	362.4559
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1589**	**1.4512**	**2.6022**	**4.1000e-003**		**0.0711**	**0.0711**		**0.0654**	**0.0654**	**0.0000**	**360.0108**	**360.0108**	**0.1164**	**0.0000**	**362.4559**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0326	0.0107	0.0856	3.3000e-004	0.0307	1.9000e-004	0.0309	8.1400e-003	1.7000e-004	8.3200e-003	0.0000	19.6865	19.6865	8.3000e-004	0.0000	19.7039
Total	**0.0326**	**0.0107**	**0.0856**	**3.3000e-004**	**0.0307**	**1.9000e-004**	**0.0309**	**8.1400e-003**	**1.7000e-004**	**8.3200e-003**	**0.0000**	**19.6865**	**19.6865**	**8.3000e-004**	**0.0000**	**19.7039**

3.5 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0080					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0219	0.1485	0.2065	3.4000e-004		8.0700e-003	8.0700e-003		8.0700e-003	8.0700e-003	0.0000	29.1071	29.1071	1.7400e-003	0.0000	29.1437
Total	**1.0298**	**0.1485**	**0.2065**	**3.4000e-004**		**8.0700e-003**	**8.0700e-003**		**8.0700e-003**	**8.0700e-003**	**0.0000**	**29.1071**	**29.1071**	**1.7400e-003**	**0.0000**	**29.1437**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0147	5.2000e-003	0.0420	1.4000e-004	0.0127	8.0000e-005	0.0128	3.3800e-003	7.0000e-005	3.4500e-003	0.0000	8.5113	8.5113	3.9000e-004	0.0000	8.5195
Total	**0.0147**	**5.2000e-003**	**0.0420**	**1.4000e-004**	**0.0127**	**8.0000e-005**	**0.0128**	**3.3800e-003**	**7.0000e-005**	**3.4500e-003**	**0.0000**	**8.5113**	**8.5113**	**3.9000e-004**	**0.0000**	**8.5195**

3.5 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0080					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0218	0.1484	0.2062	3.4000e-004		8.0600e-003	8.0600e-003		8.0600e-003	8.0600e-003	0.0000	29.0725	29.0725	1.7400e-003	0.0000	29.1090
Total	**1.0298**	**0.1484**	**0.2062**	**3.4000e-004**		**8.0600e-003**	**8.0600e-003**		**8.0600e-003**	**8.0600e-003**	**0.0000**	**29.0725**	**29.0725**	**1.7400e-003**	**0.0000**	**29.1090**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0147	5.2000e-003	0.0420	1.4000e-004	0.0127	8.0000e-005	0.0128	3.3800e-003	7.0000e-005	3.4500e-003	0.0000	8.5113	8.5113	3.9000e-004	0.0000	8.5195
Total	**0.0147**	**5.2000e-003**	**0.0420**	**1.4000e-004**	**0.0127**	**8.0000e-005**	**0.0128**	**3.3800e-003**	**7.0000e-005**	**3.4500e-003**	**0.0000**	**8.5113**	**8.5113**	**3.9000e-004**	**0.0000**	**8.5195**

3.5 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1583					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1597	0.2371	3.9000e-004		7.9800e-003	7.9800e-003		7.9800e-003	7.9800e-003	0.0000	33.4476	33.4476	1.8800e-003	0.0000	33.4872
Total	**1.1820**	**0.1597**	**0.2371**	**3.9000e-004**		**7.9800e-003**	**7.9800e-003**		**7.9800e-003**	**7.9800e-003**	**0.0000**	**33.4476**	**33.4476**	**1.8800e-003**	**0.0000**	**33.4872**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0164	5.6400e-003	0.0456	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8800e-003	8.0000e-005	3.9700e-003	0.0000	9.6565	9.6565	4.3000e-004	0.0000	9.6656
Total	**0.0164**	**5.6400e-003**	**0.0456**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8800e-003**	**8.0000e-005**	**3.9700e-003**	**0.0000**	**9.6565**	**9.6565**	**4.3000e-004**	**0.0000**	**9.6656**

3.5 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1583					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1595	0.2368	3.9000e-004		7.9700e-003	7.9700e-003		7.9700e-003	7.9700e-003	0.0000	33.4078	33.4078	1.8800e-003	0.0000	33.4473
Total	**1.1819**	**0.1595**	**0.2368**	**3.9000e-004**		**7.9700e-003**	**7.9700e-003**		**7.9700e-003**	**7.9700e-003**	**0.0000**	**33.4078**	**33.4078**	**1.8800e-003**	**0.0000**	**33.4473**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0164	5.6400e-003	0.0456	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8800e-003	8.0000e-005	3.9700e-003	0.0000	9.6565	9.6565	4.3000e-004	0.0000	9.6656
Total	**0.0164**	**5.6400e-003**	**0.0456**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8800e-003**	**8.0000e-005**	**3.9700e-003**	**0.0000**	**9.6565**	**9.6565**	**4.3000e-004**	**0.0000**	**9.6656**

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1539					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1495	0.2361	3.9000e-004		6.7200e-003	6.7200e-003		6.7200e-003	6.7200e-003	0.0000	33.3200	33.3200	1.8200e-003	0.0000	33.3581
Total	**1.1762**	**0.1495**	**0.2361**	**3.9000e-004**		**6.7200e-003**	**6.7200e-003**		**6.7200e-003**	**6.7200e-003**	**0.0000**	**33.3200**	**33.3200**	**1.8200e-003**	**0.0000**	**33.3581**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0159	5.3300e-003	0.0433	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8700e-003	8.0000e-005	3.9500e-003	0.0000	9.5089	9.5089	4.2000e-004	0.0000	9.5176
Total	**0.0159**	**5.3300e-003**	**0.0433**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8700e-003**	**8.0000e-005**	**3.9500e-003**	**0.0000**	**9.5089**	**9.5089**	**4.2000e-004**	**0.0000**	**9.5176**

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1539					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1493	0.2358	3.9000e-004		6.7100e-003	6.7100e-003		6.7100e-003	6.7100e-003	0.0000	33.2803	33.2803	1.8200e-003	0.0000	33.3185
Total	**1.1761**	**0.1493**	**0.2358**	**3.9000e-004**		**6.7100e-003**	**6.7100e-003**		**6.7100e-003**	**6.7100e-003**	**0.0000**	**33.2803**	**33.2803**	**1.8200e-003**	**0.0000**	**33.3185**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0159	5.3300e-003	0.0433	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8700e-003	8.0000e-005	3.9500e-003	0.0000	9.5089	9.5089	4.2000e-004	0.0000	9.5176
Total	**0.0159**	**5.3300e-003**	**0.0433**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8700e-003**	**8.0000e-005**	**3.9500e-003**	**0.0000**	**9.5089**	**9.5089**	**4.2000e-004**	**0.0000**	**9.5176**

3.5 Architectural Coating - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1539					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1495	0.2361	3.9000e-004		6.7200e-003	6.7200e-003		6.7200e-003	6.7200e-003	0.0000	33.3200	33.3200	1.8200e-003	0.0000	33.3581
Total	**1.1762**	**0.1495**	**0.2361**	**3.9000e-004**		**6.7200e-003**	**6.7200e-003**		**6.7200e-003**	**6.7200e-003**	**0.0000**	**33.3200**	**33.3200**	**1.8200e-003**	**0.0000**	**33.3581**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0155	5.0700e-003	0.0406	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8700e-003	8.0000e-005	3.9500e-003	0.0000	9.3472	9.3472	4.0000e-004	0.0000	9.3555
Total	**0.0155**	**5.0700e-003**	**0.0406**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8700e-003**	**8.0000e-005**	**3.9500e-003**	**0.0000**	**9.3472**	**9.3472**	**4.0000e-004**	**0.0000**	**9.3555**

3.5 Architectural Coating - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1539					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1493	0.2358	3.9000e-004		6.7100e-003	6.7100e-003		6.7100e-003	6.7100e-003	0.0000	33.2803	33.2803	1.8200e-003	0.0000	33.3185
Total	**1.1761**	**0.1493**	**0.2358**	**3.9000e-004**		**6.7100e-003**	**6.7100e-003**		**6.7100e-003**	**6.7100e-003**	**0.0000**	**33.2803**	**33.2803**	**1.8200e-003**	**0.0000**	**33.3185**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0155	5.0700e-003	0.0406	1.6000e-004	0.0146	9.0000e-005	0.0147	3.8700e-003	8.0000e-005	3.9500e-003	0.0000	9.3472	9.3472	4.0000e-004	0.0000	9.3555
Total	**0.0155**	**5.0700e-003**	**0.0406**	**1.6000e-004**	**0.0146**	**9.0000e-005**	**0.0147**	**3.8700e-003**	**8.0000e-005**	**3.9500e-003**	**0.0000**	**9.3472**	**9.3472**	**4.0000e-004**	**0.0000**	**9.3555**

3.6 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3673	3.6335	3.5556	6.4300e-003		0.1617	0.1617		0.1487	0.1487	0.0000	564.7092	564.7092	0.1826	0.0000	568.5446
Total	**0.3673**	**3.6335**	**3.5556**	**6.4300e-003**	**3.9119**	**0.1617**	**4.0736**	**1.4239**	**0.1487**	**1.5726**	**0.0000**	**564.7092**	**564.7092**	**0.1826**	**0.0000**	**568.5446**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.7100e-003	9.6900e-003	0.0239	6.0000e-005	4.0500e-003	2.3000e-004	4.2800e-003	1.0300e-003	2.1000e-004	1.2400e-003	0.0000	5.0089	5.0089	4.0000e-005	0.0000	5.0096
Vendor	9.2500e-003	0.0280	0.0588	1.9000e-004	5.5200e-003	6.7000e-004	6.1800e-003	1.5700e-003	6.1000e-004	2.1900e-003	0.0000	16.1312	16.1312	1.0000e-004	0.0000	16.1333
Worker	0.0269	9.4900e-003	0.0767	2.5000e-004	0.0232	1.4000e-004	0.0234	6.1600e-003	1.3000e-004	6.3000e-003	0.0000	15.5294	15.5294	7.1000e-004	0.0000	15.5444
Total	**0.0388**	**0.0472**	**0.1594**	**5.0000e-004**	**0.0328**	**1.0400e-003**	**0.0338**	**8.7600e-003**	**9.5000e-004**	**9.7300e-003**	**0.0000**	**36.6695**	**36.6695**	**8.5000e-004**	**0.0000**	**36.6873**

3.6 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3668	3.6292	3.5514	6.4200e-003		0.1615	0.1615		0.1485	0.1485	0.0000	564.0374	564.0374	0.1824	0.0000	567.8683
Total	**0.3668**	**3.6292**	**3.5514**	**6.4200e-003**	**3.9119**	**0.1615**	**4.0734**	**1.4239**	**0.1485**	**1.5725**	**0.0000**	**564.0374**	**564.0374**	**0.1824**	**0.0000**	**567.8683**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.7100e-003	9.6900e-003	0.0239	6.0000e-005	0.7743	2.3000e-004	0.7745	0.1901	2.1000e-004	0.1903	0.0000	5.0089	5.0089	4.0000e-005	0.0000	5.0096
Vendor	9.2500e-003	0.0280	0.0588	1.9000e-004	5.5200e-003	6.7000e-004	6.1800e-003	1.5700e-003	6.1000e-004	2.1900e-003	0.0000	16.1312	16.1312	1.0000e-004	0.0000	16.1333
Worker	0.0269	9.4900e-003	0.0767	2.5000e-004	0.0232	1.4000e-004	0.0234	6.1600e-003	1.3000e-004	6.3000e-003	0.0000	15.5294	15.5294	7.1000e-004	0.0000	15.5444
Total	**0.0388**	**0.0472**	**0.1594**	**5.0000e-004**	**0.8030**	**1.0400e-003**	**0.8040**	**0.1978**	**9.5000e-004**	**0.1988**	**0.0000**	**36.6695**	**36.6695**	**8.5000e-004**	**0.0000**	**36.6873**

3.6 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4402	4.2173	4.3812	8.1000e-003		0.1865	0.1865		0.1716	0.1716	0.0000	711.1487	711.1487	0.2300	0.0000	715.9787
Total	**0.4402**	**4.2173**	**4.3812**	**8.1000e-003**	**3.9119**	**0.1865**	**4.0984**	**1.4239**	**0.1716**	**1.5955**	**0.0000**	**711.1487**	**711.1487**	**0.2300**	**0.0000**	**715.9787**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2400e-003	0.0121	0.0293	7.0000e-005	4.1300e-003	2.9000e-004	4.4200e-003	1.0600e-003	2.7000e-004	1.3300e-003	0.0000	6.3139	6.3139	5.0000e-005	0.0000	6.3149
Vendor	0.0111	0.0348	0.0713	2.4000e-004	6.9500e-003	8.5000e-004	7.8000e-003	1.9800e-003	7.8000e-004	2.7600e-003	0.0000	20.3315	20.3315	1.3000e-004	0.0000	20.3342
Worker	0.0327	0.0113	0.0912	3.1000e-004	0.0292	1.8000e-004	0.0294	7.7600e-003	1.7000e-004	7.9300e-003	0.0000	19.3130	19.3130	8.6000e-004	0.0000	19.3311
Total	**0.0471**	**0.0582**	**0.1918**	**6.2000e-004**	**0.0403**	**1.3200e-003**	**0.0416**	**0.0108**	**1.2200e-003**	**0.0120**	**0.0000**	**45.9585**	**45.9585**	**1.0400e-003**	**0.0000**	**45.9802**

3.6 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4396	4.2122	4.3760	8.0900e-003		0.1863	0.1863		0.1714	0.1714	0.0000	710.3028	710.3028	0.2297	0.0000	715.1270
Total	**0.4396**	**4.2122**	**4.3760**	**8.0900e-003**	**3.9119**	**0.1863**	**4.0982**	**1.4239**	**0.1714**	**1.5953**	**0.0000**	**710.3028**	**710.3028**	**0.2297**	**0.0000**	**715.1270**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2400e-003	0.0121	0.0293	7.0000e-005	0.9753	2.9000e-004	0.9756	0.2394	2.7000e-004	0.2397	0.0000	6.3139	6.3139	5.0000e-005	0.0000	6.3149
Vendor	0.0111	0.0348	0.0713	2.4000e-004	6.9500e-003	8.5000e-004	7.8000e-003	1.9800e-003	7.8000e-004	2.7600e-003	0.0000	20.3315	20.3315	1.3000e-004	0.0000	20.3342
Worker	0.0327	0.0113	0.0912	3.1000e-004	0.0292	1.8000e-004	0.0294	7.7600e-003	1.7000e-004	7.9300e-003	0.0000	19.3130	19.3130	8.6000e-004	0.0000	19.3311
Total	**0.0471**	**0.0582**	**0.1918**	**6.2000e-004**	**1.0115**	**1.3200e-003**	**1.0128**	**0.2492**	**1.2200e-003**	**0.2504**	**0.0000**	**45.9585**	**45.9585**	**1.0400e-003**	**0.0000**	**45.9802**

3.6 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3918	3.5575	4.0914	8.0600e-003		0.1549	0.1549		0.1425	0.1425	0.0000	708.2364	708.2364	0.2291	0.0000	713.0466
Total	**0.3918**	**3.5575**	**4.0914**	**8.0600e-003**	**3.9119**	**0.1549**	**4.0668**	**1.4239**	**0.1425**	**1.5664**	**0.0000**	**708.2364**	**708.2364**	**0.2291**	**0.0000**	**713.0466**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.1800e-003	0.0119	0.0289	7.0000e-005	4.1300e-003	2.9000e-004	4.4200e-003	1.0600e-003	2.7000e-004	1.3300e-003	0.0000	6.2955	6.2955	5.0000e-005	0.0000	6.2965
Vendor	0.0110	0.0344	0.0698	2.4000e-004	6.9300e-003	8.5000e-004	7.7700e-003	1.9700e-003	7.8000e-004	2.7500e-003	0.0000	20.2716	20.2716	1.3000e-004	0.0000	20.2743
Worker	0.0318	0.0107	0.0866	3.1000e-004	0.0291	1.8000e-004	0.0293	7.7300e-003	1.7000e-004	7.9000e-003	0.0000	19.0177	19.0177	8.3000e-004	0.0000	19.0352
Total	**0.0459**	**0.0569**	**0.1853**	**6.2000e-004**	**0.0402**	**1.3200e-003**	**0.0415**	**0.0108**	**1.2200e-003**	**0.0120**	**0.0000**	**45.5849**	**45.5849**	**1.0100e-003**	**0.0000**	**45.6060**

3.6 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3913	3.5533	4.0865	8.0500e-003		0.1547	0.1547		0.1423	0.1423	0.0000	707.3939	707.3939	0.2288	0.0000	712.1984
Total	**0.3913**	**3.5533**	**4.0865**	**8.0500e-003**	**3.9119**	**0.1547**	**4.0666**	**1.4239**	**0.1423**	**1.5662**	**0.0000**	**707.3939**	**707.3939**	**0.2288**	**0.0000**	**712.1984**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.1800e-003	0.0119	0.0289	7.0000e-005	0.9716	2.9000e-004	0.9718	0.2385	2.7000e-004	0.2388	0.0000	6.2955	6.2955	5.0000e-005	0.0000	6.2965
Vendor	0.0110	0.0344	0.0698	2.4000e-004	6.9300e-003	8.5000e-004	7.7700e-003	1.9700e-003	7.8000e-004	2.7500e-003	0.0000	20.2716	20.2716	1.3000e-004	0.0000	20.2743
Worker	0.0318	0.0107	0.0866	3.1000e-004	0.0291	1.8000e-004	0.0293	7.7300e-003	1.7000e-004	7.9000e-003	0.0000	19.0177	19.0177	8.3000e-004	0.0000	19.0352
Total	**0.0459**	**0.0569**	**0.1853**	**6.2000e-004**	**1.0076**	**1.3200e-003**	**1.0089**	**0.2482**	**1.2200e-003**	**0.2494**	**0.0000**	**45.5849**	**45.5849**	**1.0100e-003**	**0.0000**	**45.6060**

3.6 Grading - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0330	0.2999	0.3449	6.8000e-004		0.0131	0.0131		0.0120	0.0120	0.0000	59.6981	59.6981	0.0193	0.0000	60.1036
Total	**0.0330**	**0.2999**	**0.3449**	**6.8000e-004**	**3.9119**	**0.0131**	**3.9250**	**1.4239**	**0.0120**	**1.4359**	**0.0000**	**59.6981**	**59.6981**	**0.0193**	**0.0000**	**60.1036**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.8000e-004	2.3500e-003	1.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	9.3000e-004	2.0000e-005	9.5000e-004	0.0000	0.5309	0.5309	0.0000	0.0000	0.5309
Vendor	9.1000e-004	2.8500e-003	5.6600e-003	2.0000e-005	5.8000e-004	7.0000e-005	6.6000e-004	1.7000e-004	7.0000e-005	2.3000e-004	0.0000	1.7097	1.7097	1.0000e-005	0.0000	1.7099
Worker	2.6100e-003	8.5000e-004	6.8500e-003	3.0000e-005	2.4500e-003	2.0000e-005	2.4700e-003	6.5000e-004	1.0000e-005	6.7000e-004	0.0000	1.5758	1.5758	7.0000e-005	0.0000	1.5772
Total	**3.7800e-003**	**4.6800e-003**	**0.0149**	**6.0000e-005**	**6.7900e-003**	**1.1000e-004**	**6.9100e-003**	**1.7500e-003**	**1.0000e-004**	**1.8500e-003**	**0.0000**	**3.8164**	**3.8164**	**8.0000e-005**	**0.0000**	**3.8181**

3.6 Grading - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0330	0.2995	0.3445	6.8000e-004		0.0130	0.0130		0.0120	0.0120	0.0000	59.6271	59.6271	0.0193	0.0000	60.0321
Total	**0.0330**	**0.2995**	**0.3445**	**6.8000e-004**	**3.9119**	**0.0130**	**3.9249**	**1.4239**	**0.0120**	**1.4359**	**0.0000**	**59.6271**	**59.6271**	**0.0193**	**0.0000**	**60.0321**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.8000e-004	2.3500e-003	1.0000e-005	0.0819	2.0000e-005	0.0819	0.0201	2.0000e-005	0.0201	0.0000	0.5309	0.5309	0.0000	0.0000	0.5309
Vendor	9.1000e-004	2.8500e-003	5.6600e-003	2.0000e-005	5.8000e-004	7.0000e-005	6.6000e-004	1.7000e-004	7.0000e-005	2.3000e-004	0.0000	1.7097	1.7097	1.0000e-005	0.0000	1.7099
Worker	2.6100e-003	8.5000e-004	6.8500e-003	3.0000e-005	2.4500e-003	2.0000e-005	2.4700e-003	6.5000e-004	1.0000e-005	6.7000e-004	0.0000	1.5758	1.5758	7.0000e-005	0.0000	1.5772
Total	**3.7800e-003**	**4.6800e-003**	**0.0149**	**6.0000e-005**	**0.0849**	**1.1000e-004**	**0.0851**	**0.0209**	**1.0000e-004**	**0.0210**	**0.0000**	**3.8164**	**3.8164**	**8.0000e-005**	**0.0000**	**3.8181**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.8431	1.3007	6.5063	0.0191	1.4252	0.0209	1.4461	0.3817	0.0193	0.4010	0.0000	1,279.6341	1,279.6341	0.0439	0.0000	1,280.5552
Unmitigated	1.8431	1.3007	6.5063	0.0191	1.4252	0.0209	1.4461	0.3817	0.0193	0.4010	0.0000	1,279.6341	1,279.6341	0.0439	0.0000	1,280.5552

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	1,368.51	1,368.51	1368.51	3,775,899	3,775,899
Total	1,368.51	1,368.51	1,368.51	3,775,899	3,775,899

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	12.30	5.90	6.40	37.50	15.00	47.50	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.489821	0.036204	0.210874	0.153026	0.049322	0.007389	0.020723	0.015503	0.002015	0.002209	0.008256	0.001515	0.003143

4.4 Fleet Mix

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
NaturalGas Mitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
NaturalGas Unmitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5962	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693
Unmitigated	1.5962	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1170					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0319	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693
Total	**1.5962**	**0.0122**	**1.0608**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7344**	**1.7344**	**1.6600e-003**	**0.0000**	**1.7693**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1170					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0319	0.0122	1.0608	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6600e-003	0.0000	1.7693
Total	**1.5962**	**0.0122**	**1.0608**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7344**	**1.7344**	**1.6600e-003**	**0.0000**	**1.7693**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	171.5657	0.0873	0.0525	189.6669
Unmitigated	171.5657	0.0877	0.0526	189.7044

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 42.5335	171.5657	0.0877	0.0526	189.7044
Total		**171.5657**	**0.0877**	**0.0526**	**189.7044**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 42.5335	171.5657	0.0873	0.0525	189.6669
Total		**171.5657**	**0.0873**	**0.0525**	**189.6669**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	31.8696	1.8834	0.0000	71.4218
Unmitigated	31.8696	1.8834	0.0000	71.4218

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
Total		**31.8696**	**1.8834**	**0.0000**	**71.4218**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
Total		**31.8696**	**1.8834**	**0.0000**	**71.4218**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Chumash Camp 4, Alt B

Santa Barbara County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Recreational	12.04	User Defined Unit	1.00	12,042.00	276
Single Family Housing	143.00	Dwelling Unit	715.00	286,000.00	374

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.9	**Precipitation Freq (Days)**	37
Climate Zone	4			**Operational Year**	2025
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot size is 5 acres. 2.61 persons per dwelling unit. Square footage based on 2,000 square feet residential units.

Construction Phase - Construction will begin in 2023 and last for four years.

Off-road Equipment - Additional paving will be needed for Tribal Hall parking.

Trips and VMT - Trip lenth is estimated to be 15 miles. Grading trips are consistent with the noise analysis.

Grading - Conservative estimate of disturbed land based on lot size, includes infrustructure.

Vehicle Trips - Trip Rate consistent with TIA and trip percentage default consistent with the ITE Manual.

Woodstoves - Now woodfired combustion units will be installed.

Water And Wastewater - Based on 335 acre feet per year, Section 4.1.2. Alternative B would reduce outdoor water consumption due to reduced lot size.

Solid Waste - Per Public Service Section.

Construction Off-road Equipment Mitigation - Clean paved roadways adjacent to soil haul route entrance twice a day.

Mobile Land Use Mitigation -

Area Mitigation -

Energy Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	880.00	1,012.00
tblConstructionPhase	NumDays	12,400.00	1,012.00
tblConstructionPhase	NumDays	1,240.00	753.00
tblConstructionPhase	NumDays	880.00	990.00
tblConstructionPhase	NumDays	480.00	390.00
tblConstructionPhase	PhaseEndDate	10/17/2030	12/31/2026
tblConstructionPhase	PhaseEndDate	5/16/2028	12/1/2026
tblConstructionPhase	PhaseEndDate	11/20/2029	1/31/2026
tblConstructionPhase	PhaseEndDate	9/17/2030	12/1/2026
tblConstructionPhase	PhaseEndDate	6/28/2024	6/30/2024

tblConstructionPhase	PhaseStartDate	12/2/2026	2/15/2023
tblConstructionPhase	PhaseStartDate	7/1/2024	1/15/2023
tblConstructionPhase	PhaseStartDate	1/1/2027	3/15/2023
tblConstructionPhase	PhaseStartDate	12/2/2026	2/15/2023
tblGrading	AcresOfGrading	1,882.50	3,100.00
tblGrading	MaterialImported	0.00	10,000.00
tblLandUse	LandUseSquareFeet	0.00	12,042.00
tblLandUse	LandUseSquareFeet	257,400.00	286,000.00
tblLandUse	LotAcreage	0.00	1.00
tblLandUse	LotAcreage	46.43	715.00
tblLandUse	Population	0.00	276.00
tblLandUse	Population	389.00	374.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	5.00
tblProjectCharacteristics	OperationalYear	2014	2025
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	153.34	157.00
tblSolidWaste	SolidWasteGenerationRate	0.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripLength	20.00	15.00
tblTripsAndVMT	HaulingTripNumber	1,250.00	770.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	VendorTripLength	4.60	15.00

tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblTripsAndVMT	WorkerTripNumber	20.00	45.00
tblVehicleTrips	CNW_TTP	0.00	95.00
tblVehicleTrips	CW_TTP	0.00	5.00
tblVehicleTrips	DV_TP	0.00	11.00
tblVehicleTrips	PB_TP	0.00	3.00
tblVehicleTrips	PR_TP	0.00	86.00
tblVehicleTrips	ST_TR	10.08	9.57
tblVehicleTrips	ST_TR	0.00	22.88
tblVehicleTrips	SU_TR	8.77	9.57
tblVehicleTrips	SU_TR	0.00	22.88
tblVehicleTrips	WD_TR	0.00	22.88
tblWater	IndoorWaterUseRate	9,317,025.66	66,526,740.00
tblWater	OutdoorWaterUseRate	5,873,777.05	2,533,490.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	2.4811	11.4051	13.0719	0.0225	7.6736	0.5265	8.2001	3.4244	0.4869	3.9113	0.0000	1,911.8757	1,911.8757	0.5157	0.0000	1,922.7052
2024	2.5232	9.9996	12.4619	0.0227	7.6872	0.4500	8.1372	3.4281	0.4163	3.8444	0.0000	1,919.0793	1,919.0793	0.5105	0.0000	1,929.7991
2025	2.2319	7.1778	10.2515	0.0199	4.1504	0.3138	4.4642	1.4879	0.2907	1.7786	0.0000	1,678.6183	1,678.6183	0.4353	0.0000	1,687.7595
2026	1.7463	3.5654	5.7317	0.0107	4.0714	0.1579	4.2292	1.4667	0.1471	1.6138	0.0000	892.9350	892.9350	0.2065	0.0000	897.2708
Total	**8.9825**	**32.1479**	**41.5169**	**0.0758**	**23.5825**	**1.4482**	**25.0307**	**9.8072**	**1.3409**	**11.1481**	**0.0000**	**6,402.5083**	**6,402.5083**	**1.6679**	**0.0000**	**6,437.5346**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	2.4797	11.3918	13.0575	0.0225	8.4438	0.5259	8.9697	3.6135	0.4863	4.0998	0.0000	1,909.8846	1,909.8846	0.5151	0.0000	1,920.7014
2024	2.5220	9.9880	12.4483	0.0226	8.6584	0.4494	9.1078	3.6665	0.4158	4.0823	0.0000	1,917.0973	1,917.0973	0.5099	0.0000	1,927.8046
2025	2.2310	7.1696	10.2404	0.0199	5.1178	0.3135	5.4312	1.7254	0.2903	2.0157	0.0000	1,676.9094	1,676.9094	0.4348	0.0000	1,686.0398
2026	1.7459	3.5613	5.7256	0.0107	4.1495	0.1577	4.3072	1.4859	0.1469	1.6328	0.0000	892.0673	892.0673	0.2062	0.0000	896.3979
Total	**8.9785**	**32.1108**	**41.4719**	**0.0757**	**26.3694**	**1.4465**	**27.8159**	**10.4913**	**1.3394**	**11.8306**	**0.0000**	**6,395.9585**	**6,395.9585**	**1.6660**	**0.0000**	**6,430.9437**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.04**	**0.12**	**0.11**	**0.09**	**-11.82**	**0.12**	**-11.13**	**-6.98**	**0.12**	**-6.12**	**0.00**	**0.10**	**0.10**	**0.12**	**0.00**	**0.10**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6572	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	2.0714	1.4698	7.4212	0.0214	1.5869	0.0235	1.6104	0.4250	0.0217	0.4467	0.0000	1,428.4057	1,428.4057	0.0492	0.0000	1,429.4394
Waste						0.0000	0.0000		0.0000	0.0000	37.9593	0.0000	37.9593	2.2433	0.0000	85.0693
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0859	0.0522	148.8200
Total	**3.7558**	**1.7145**	**8.5810**	**0.0229**	**1.5869**	**0.0482**	**1.6351**	**0.4250**	**0.0464**	**0.4714**	**61.4966**	**2,100.9229**	**2,162.4195**	**2.3986**	**0.0599**	**2,231.3514**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6572	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	2.0714	1.4698	7.4212	0.0214	1.5869	0.0235	1.6104	0.4250	0.0217	0.4467	0.0000	1,428.4057	1,428.4057	0.0492	0.0000	1,429.4394
Waste						0.0000	0.0000		0.0000	0.0000	37.9593	0.0000	37.9593	2.2433	0.0000	85.0693
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0854	0.0521	148.7825
Total	**3.7558**	**1.7145**	**8.5810**	**0.0229**	**1.5869**	**0.0482**	**1.6351**	**0.4250**	**0.0464**	**0.4714**	**61.4966**	**2,100.9229**	**2,162.4195**	**2.3981**	**0.0598**	**2,231.3138**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.15**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	6/30/2024	5	390	
2	Building Construction	Building Construction	1/15/2023	12/1/2026	5	1012	
3	Paving	Paving	2/15/2023	12/1/2026	5	990	
4	Architectural Coating	Architectural Coating	2/15/2023	12/31/2026	5	1012	
5	Grading	Grading	3/15/2023	1/31/2026	5	753	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 3100

Acres of Paving: 0

Residential Indoor: 579,150; Residential Outdoor: 193,050; Non-Residential Indoor: 18,063; Non-Residential Outdoor: 6,021

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	Cranes	1	7.00	226	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	125	0.42
Paving	Paving Equipment	5	8.00	130	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Grading	Excavators	2	8.00	162	0.38
Grading	Graders	1	8.00	174	0.41
Grading	Rubber Tired Dozers	1	8.00	255	0.40
Grading	Scrapers	2	8.00	361	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	57.00	17.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Paving	9	23.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	11.00	0.00	0.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT
Grading	8	45.00	4.00	770.00	15.00	15.00	15.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3920	3.8915	3.7465	5.0900e-003		0.1808	0.1808		0.1663	0.1663	0.0000	447.4362	447.4362	0.1447	0.0000	450.4751
Total	**0.3920**	**3.8915**	**3.7465**	**5.0900e-003**	**3.5229**	**0.1808**	**3.7037**	**1.9365**	**0.1663**	**2.1028**	**0.0000**	**447.4362**	**447.4362**	**0.1447**	**0.0000**	**450.4751**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0302	0.0107	0.0863	2.8000e-004	0.0261	1.6000e-004	0.0263	6.9300e-003	1.5000e-004	7.0800e-003	0.0000	17.4706	17.4706	8.0000e-004	0.0000	17.4874
Total	**0.0302**	**0.0107**	**0.0863**	**2.8000e-004**	**0.0261**	**1.6000e-004**	**0.0263**	**6.9300e-003**	**1.5000e-004**	**7.0800e-003**	**0.0000**	**17.4706**	**17.4706**	**8.0000e-004**	**0.0000**	**17.4874**

3.2 Site Preparation - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3916	3.8868	3.7421	5.0800e-003		0.1806	0.1806		0.1661	0.1661	0.0000	446.9039	446.9039	0.1445	0.0000	449.9392
Total	**0.3916**	**3.8868**	**3.7421**	**5.0800e-003**	**3.5229**	**0.1806**	**3.7035**	**1.9365**	**0.1661**	**2.1026**	**0.0000**	**446.9039**	**446.9039**	**0.1445**	**0.0000**	**449.9392**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0302	0.0107	0.0863	2.8000e-004	0.0261	1.6000e-004	0.0263	6.9300e-003	1.5000e-004	7.0800e-003	0.0000	17.4706	17.4706	8.0000e-004	0.0000	17.4874
Total	**0.0302**	**0.0107**	**0.0863**	**2.8000e-004**	**0.0261**	**1.6000e-004**	**0.0263**	**6.9300e-003**	**1.5000e-004**	**7.0800e-003**	**0.0000**	**17.4706**	**17.4706**	**8.0000e-004**	**0.0000**	**17.4874**

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1836	1.7904	1.7941	2.5500e-003		0.0812	0.0812		0.0747	0.0747	0.0000	223.7394	223.7394	0.0724	0.0000	225.2590
Total	**0.1836**	**1.7904**	**1.7941**	**2.5500e-003**	**3.5229**	**0.0812**	**3.6042**	**1.9365**	**0.0747**	**2.0112**	**0.0000**	**223.7394**	**223.7394**	**0.0724**	**0.0000**	**225.2590**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0146	5.0300e-003	0.0407	1.4000e-004	0.0131	8.0000e-005	0.0131	3.4700e-003	8.0000e-005	3.5400e-003	0.0000	8.6245	8.6245	3.9000e-004	0.0000	8.6326
Total	**0.0146**	**5.0300e-003**	**0.0407**	**1.4000e-004**	**0.0131**	**8.0000e-005**	**0.0131**	**3.4700e-003**	**8.0000e-005**	**3.5400e-003**	**0.0000**	**8.6245**	**8.6245**	**3.9000e-004**	**0.0000**	**8.6326**

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.5229	0.0000	3.5229	1.9365	0.0000	1.9365	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1833	1.7883	1.7920	2.5400e-003		0.0811	0.0811		0.0747	0.0747	0.0000	223.4732	223.4732	0.0723	0.0000	224.9910
Total	**0.1833**	**1.7883**	**1.7920**	**2.5400e-003**	**3.5229**	**0.0811**	**3.6041**	**1.9365**	**0.0747**	**2.0111**	**0.0000**	**223.4732**	**223.4732**	**0.0723**	**0.0000**	**224.9910**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0146	5.0300e-003	0.0407	1.4000e-004	0.0131	8.0000e-005	0.0131	3.4700e-003	8.0000e-005	3.5400e-003	0.0000	8.6245	8.6245	3.9000e-004	0.0000	8.6326
Total	**0.0146**	**5.0300e-003**	**0.0407**	**1.4000e-004**	**0.0131**	**8.0000e-005**	**0.0131**	**3.4700e-003**	**8.0000e-005**	**3.5400e-003**	**0.0000**	**8.6245**	**8.6245**	**3.9000e-004**	**0.0000**	**8.6326**

3.3 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1958	1.7891	2.0262	3.3500e-003		0.0871	0.0871		0.0820	0.0820	0.0000	288.5558	288.5558	0.0685	0.0000	289.9951
Total	**0.1958**	**1.7891**	**2.0262**	**3.3500e-003**		**0.0871**	**0.0871**		**0.0820**	**0.0820**	**0.0000**	**288.5558**	**288.5558**	**0.0685**	**0.0000**	**289.9951**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0473	0.1429	0.3002	9.7000e-004	0.0282	3.4100e-003	0.0316	8.0300e-003	3.1400e-003	0.0112	0.0000	82.4007	82.4007	5.1000e-004	0.0000	82.4115
Worker	0.0920	0.0325	0.2628	8.6000e-004	0.0795	5.0000e-004	0.0800	0.0211	4.6000e-004	0.0216	0.0000	53.1958	53.1958	2.4400e-003	0.0000	53.2470
Total	**0.1392**	**0.1754**	**0.5630**	**1.8300e-003**	**0.1077**	**3.9100e-003**	**0.1116**	**0.0291**	**3.6000e-003**	**0.0327**	**0.0000**	**135.5965**	**135.5965**	**2.9500e-003**	**0.0000**	**135.6585**

3.3 Building Construction - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1955	1.7870	2.0238	3.3500e-003		0.0870	0.0870		0.0819	0.0819	0.0000	288.2125	288.2125	0.0685	0.0000	289.6501
Total	**0.1955**	**1.7870**	**2.0238**	**3.3500e-003**		**0.0870**	**0.0870**		**0.0819**	**0.0819**	**0.0000**	**288.2125**	**288.2125**	**0.0685**	**0.0000**	**289.6501**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0473	0.1429	0.3002	9.7000e-004	0.0282	3.4100e-003	0.0316	8.0300e-003	3.1400e-003	0.0112	0.0000	82.4007	82.4007	5.1000e-004	0.0000	82.4115
Worker	0.0920	0.0325	0.2628	8.6000e-004	0.0795	5.0000e-004	0.0800	0.0211	4.6000e-004	0.0216	0.0000	53.1958	53.1958	2.4400e-003	0.0000	53.2470
Total	**0.1392**	**0.1754**	**0.5630**	**1.8300e-003**	**0.1077**	**3.9100e-003**	**0.1116**	**0.0291**	**3.6000e-003**	**0.0327**	**0.0000**	**135.5965**	**135.5965**	**2.9500e-003**	**0.0000**	**135.6585**

3.3 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1920	1.7524	2.1135	3.5200e-003		0.0800	0.0800		0.0752	0.0752	0.0000	302.4646	302.4646	0.0714	0.0000	303.9643
Total	**0.1920**	**1.7524**	**2.1135**	**3.5200e-003**		**0.0800**	**0.0800**		**0.0752**	**0.0752**	**0.0000**	**302.4646**	**302.4646**	**0.0714**	**0.0000**	**303.9643**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0473	0.1480	0.3030	1.0200e-003	0.0295	3.5900e-003	0.0331	8.4200e-003	3.3100e-003	0.0117	0.0000	86.4090	86.4090	5.4000e-004	0.0000	86.4204
Worker	0.0932	0.0321	0.2600	9.0000e-004	0.0833	5.2000e-004	0.0838	0.0221	4.8000e-004	0.0226	0.0000	55.0421	55.0421	2.4600e-003	0.0000	55.0938
Total	**0.1405**	**0.1801**	**0.5630**	**1.9200e-003**	**0.1128**	**4.1100e-003**	**0.1169**	**0.0306**	**3.7900e-003**	**0.0343**	**0.0000**	**141.4511**	**141.4511**	**3.0000e-003**	**0.0000**	**141.5141**

3.3 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1917	1.7504	2.1109	3.5100e-003		0.0799	0.0799		0.0752	0.0752	0.0000	302.1048	302.1048	0.0713	0.0000	303.6027
Total	**0.1917**	**1.7504**	**2.1109**	**3.5100e-003**		**0.0799**	**0.0799**		**0.0752**	**0.0752**	**0.0000**	**302.1048**	**302.1048**	**0.0713**	**0.0000**	**303.6027**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0473	0.1480	0.3030	1.0200e-003	0.0295	3.5900e-003	0.0331	8.4200e-003	3.3100e-003	0.0117	0.0000	86.4090	86.4090	5.4000e-004	0.0000	86.4204
Worker	0.0932	0.0321	0.2600	9.0000e-004	0.0833	5.2000e-004	0.0838	0.0221	4.8000e-004	0.0226	0.0000	55.0421	55.0421	2.4600e-003	0.0000	55.0938
Total	**0.1405**	**0.1801**	**0.5630**	**1.9200e-003**	**0.1128**	**4.1100e-003**	**0.1169**	**0.0306**	**3.7900e-003**	**0.0343**	**0.0000**	**141.4511**	**141.4511**	**3.0000e-003**	**0.0000**	**141.5141**

3.3 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1777	1.6195	2.0948	3.5000e-003		0.0685	0.0685		0.0645	0.0645	0.0000	301.4019	301.4019	0.0707	0.0000	302.8874
Total	**0.1777**	**1.6195**	**2.0948**	**3.5000e-003**		**0.0685**	**0.0685**		**0.0645**	**0.0645**	**0.0000**	**301.4019**	**301.4019**	**0.0707**	**0.0000**	**302.8874**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0465	0.1460	0.2967	1.0100e-003	0.0294	3.6000e-003	0.0330	8.3900e-003	3.3100e-003	0.0117	0.0000	86.1542	86.1542	5.4000e-004	0.0000	86.1656
Worker	0.0905	0.0304	0.2467	8.9000e-004	0.0830	5.2000e-004	0.0835	0.0220	4.8000e-004	0.0225	0.0000	54.2005	54.2005	2.3700e-003	0.0000	54.2504
Total	**0.1370**	**0.1764**	**0.5435**	**1.9000e-003**	**0.1124**	**4.1200e-003**	**0.1165**	**0.0304**	**3.7900e-003**	**0.0342**	**0.0000**	**140.3548**	**140.3548**	**2.9100e-003**	**0.0000**	**140.4160**

3.3 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1775	1.6175	2.0923	3.5000e-003		0.0684	0.0684		0.0644	0.0644	0.0000	301.0433	301.0433	0.0707	0.0000	302.5271
Total	**0.1775**	**1.6175**	**2.0923**	**3.5000e-003**		**0.0684**	**0.0684**		**0.0644**	**0.0644**	**0.0000**	**301.0433**	**301.0433**	**0.0707**	**0.0000**	**302.5271**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0465	0.1460	0.2967	1.0100e-003	0.0294	3.6000e-003	0.0330	8.3900e-003	3.3100e-003	0.0117	0.0000	86.1542	86.1542	5.4000e-004	0.0000	86.1656
Worker	0.0905	0.0304	0.2467	8.9000e-004	0.0830	5.2000e-004	0.0835	0.0220	4.8000e-004	0.0225	0.0000	54.2005	54.2005	2.3700e-003	0.0000	54.2504
Total	**0.1370**	**0.1764**	**0.5435**	**1.9000e-003**	**0.1124**	**4.1200e-003**	**0.1165**	**0.0304**	**3.7900e-003**	**0.0342**	**0.0000**	**140.3548**	**140.3548**	**2.9100e-003**	**0.0000**	**140.4160**

3.3 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1627	1.4830	1.9182	3.2100e-003		0.0627	0.0627		0.0590	0.0590	0.0000	275.9964	275.9964	0.0648	0.0000	277.3567
Total	**0.1627**	**1.4830**	**1.9182**	**3.2100e-003**		**0.0627**	**0.0627**		**0.0590**	**0.0590**	**0.0000**	**275.9964**	**275.9964**	**0.0648**	**0.0000**	**277.3567**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0419	0.1317	0.2615	9.3000e-004	0.0270	3.2800e-003	0.0302	7.6900e-003	3.0200e-003	0.0107	0.0000	78.9383	78.9383	4.9000e-004	0.0000	78.9487
Worker	0.0808	0.0265	0.2120	8.1000e-004	0.0760	4.7000e-004	0.0764	0.0202	4.3000e-004	0.0206	0.0000	48.7882	48.7882	2.0600e-003	0.0000	48.8315
Total	**0.1227**	**0.1581**	**0.4736**	**1.7400e-003**	**0.1029**	**3.7500e-003**	**0.1067**	**0.0279**	**3.4500e-003**	**0.0313**	**0.0000**	**127.7265**	**127.7265**	**2.5500e-003**	**0.0000**	**127.7802**

3.3 Building Construction - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1625	1.4812	1.9159	3.2000e-003		0.0627	0.0627		0.0590	0.0590	0.0000	275.6680	275.6680	0.0647	0.0000	277.0267
Total	**0.1625**	**1.4812**	**1.9159**	**3.2000e-003**		**0.0627**	**0.0627**		**0.0590**	**0.0590**	**0.0000**	**275.6680**	**275.6680**	**0.0647**	**0.0000**	**277.0267**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0419	0.1317	0.2615	9.3000e-004	0.0270	3.2800e-003	0.0302	7.6900e-003	3.0200e-003	0.0107	0.0000	78.9383	78.9383	4.9000e-004	0.0000	78.9487
Worker	0.0808	0.0265	0.2120	8.1000e-004	0.0760	4.7000e-004	0.0764	0.0202	4.3000e-004	0.0206	0.0000	48.7882	48.7882	2.0600e-003	0.0000	48.8315
Total	**0.1227**	**0.1581**	**0.4736**	**1.7400e-003**	**0.1029**	**3.7500e-003**	**0.1067**	**0.0279**	**3.4500e-003**	**0.0313**	**0.0000**	**127.7265**	**127.7265**	**2.5500e-003**	**0.0000**	**127.7802**

3.4 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1730	1.6797	2.4896	3.9200e-003		0.0834	0.0834		0.0767	0.0767	0.0000	343.9806	343.9806	0.1113	0.0000	346.3168
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1730**	**1.6797**	**2.4896**	**3.9200e-003**		**0.0834**	**0.0834**		**0.0767**	**0.0767**	**0.0000**	**343.9806**	**343.9806**	**0.1113**	**0.0000**	**346.3168**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0338	0.0120	0.0967	3.2000e-004	0.0293	1.8000e-004	0.0294	7.7700e-003	1.7000e-004	7.9400e-003	0.0000	19.5761	19.5761	9.0000e-004	0.0000	19.5949
Total	**0.0338**	**0.0120**	**0.0967**	**3.2000e-004**	**0.0293**	**1.8000e-004**	**0.0294**	**7.7700e-003**	**1.7000e-004**	**7.9400e-003**	**0.0000**	**19.5761**	**19.5761**	**9.0000e-004**	**0.0000**	**19.5949**

3.4 Paving - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1728	1.6777	2.4867	3.9100e-003		0.0833	0.0833		0.0766	0.0766	0.0000	343.5714	343.5714	0.1111	0.0000	345.9048
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1728**	**1.6777**	**2.4867**	**3.9100e-003**		**0.0833**	**0.0833**		**0.0766**	**0.0766**	**0.0000**	**343.5714**	**343.5714**	**0.1111**	**0.0000**	**345.9048**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0338	0.0120	0.0967	3.2000e-004	0.0293	1.8000e-004	0.0294	7.7700e-003	1.7000e-004	7.9400e-003	0.0000	19.5761	19.5761	9.0000e-004	0.0000	19.5949
Total	**0.0338**	**0.0120**	**0.0967**	**3.2000e-004**	**0.0293**	**1.8000e-004**	**0.0294**	**7.7700e-003**	**1.7000e-004**	**7.9400e-003**	**0.0000**	**19.5761**	**19.5761**	**9.0000e-004**	**0.0000**	**19.5949**

3.4 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1907	1.8033	2.8713	4.5000e-003		0.0882	0.0882		0.0812	0.0812	0.0000	395.2716	395.2716	0.1278	0.0000	397.9562
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1907**	**1.8033**	**2.8713**	**4.5000e-003**		**0.0882**	**0.0882**		**0.0812**	**0.0812**	**0.0000**	**395.2716**	**395.2716**	**0.1278**	**0.0000**	**397.9562**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0376	0.0130	0.1049	3.6000e-004	0.0336	2.1000e-004	0.0338	8.9300e-003	1.9000e-004	9.1200e-003	0.0000	22.2100	22.2100	9.9000e-004	0.0000	22.2308
Total	**0.0376**	**0.0130**	**0.1049**	**3.6000e-004**	**0.0336**	**2.1000e-004**	**0.0338**	**8.9300e-003**	**1.9000e-004**	**9.1200e-003**	**0.0000**	**22.2100**	**22.2100**	**9.9000e-004**	**0.0000**	**22.2308**

3.4 Paving - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1905	1.8012	2.8679	4.5000e-003		0.0881	0.0881		0.0811	0.0811	0.0000	394.8013	394.8013	0.1277	0.0000	397.4828
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1905**	**1.8012**	**2.8679**	**4.5000e-003**		**0.0881**	**0.0881**		**0.0811**	**0.0811**	**0.0000**	**394.8013**	**394.8013**	**0.1277**	**0.0000**	**397.4828**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0376	0.0130	0.1049	3.6000e-004	0.0336	2.1000e-004	0.0338	8.9300e-003	1.9000e-004	9.1200e-003	0.0000	22.2100	22.2100	9.9000e-004	0.0000	22.2308
Total	**0.0376**	**0.0130**	**0.1049**	**3.6000e-004**	**0.0336**	**2.1000e-004**	**0.0338**	**8.9300e-003**	**1.9000e-004**	**9.1200e-003**	**0.0000**	**22.2100**	**22.2100**	**9.9000e-004**	**0.0000**	**22.2308**

3.4 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1737	1.5866	2.8451	4.4800e-003		0.0777	0.0777		0.0715	0.0715	0.0000	393.6181	393.6181	0.1273	0.0000	396.2915
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1737**	**1.5866**	**2.8451**	**4.4800e-003**		**0.0777**	**0.0777**		**0.0715**	**0.0715**	**0.0000**	**393.6181**	**393.6181**	**0.1273**	**0.0000**	**396.2915**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0123	0.0996	3.6000e-004	0.0335	2.1000e-004	0.0337	8.8900e-003	1.9000e-004	9.0900e-003	0.0000	21.8704	21.8704	9.6000e-004	0.0000	21.8905
Total	**0.0365**	**0.0123**	**0.0996**	**3.6000e-004**	**0.0335**	**2.1000e-004**	**0.0337**	**8.8900e-003**	**1.9000e-004**	**9.0900e-003**	**0.0000**	**21.8704**	**21.8704**	**9.6000e-004**	**0.0000**	**21.8905**

3.4 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1735	1.5848	2.8418	4.4800e-003		0.0777	0.0777		0.0714	0.0714	0.0000	393.1499	393.1499	0.1272	0.0000	395.8201
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1735**	**1.5848**	**2.8418**	**4.4800e-003**		**0.0777**	**0.0777**		**0.0714**	**0.0714**	**0.0000**	**393.1499**	**393.1499**	**0.1272**	**0.0000**	**395.8201**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0365	0.0123	0.0996	3.6000e-004	0.0335	2.1000e-004	0.0337	8.8900e-003	1.9000e-004	9.0900e-003	0.0000	21.8704	21.8704	9.6000e-004	0.0000	21.8905
Total	**0.0365**	**0.0123**	**0.0996**	**3.6000e-004**	**0.0335**	**2.1000e-004**	**0.0337**	**8.8900e-003**	**1.9000e-004**	**9.0900e-003**	**0.0000**	**21.8704**	**21.8704**	**9.6000e-004**	**0.0000**	**21.8905**

3.4 Paving - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1591	1.4529	2.6053	4.1000e-003		0.0712	0.0712		0.0655	0.0655	0.0000	360.4396	360.4396	0.1166	0.0000	362.8876
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1591**	**1.4529**	**2.6053**	**4.1000e-003**		**0.0712**	**0.0712**		**0.0655**	**0.0655**	**0.0000**	**360.4396**	**360.4396**	**0.1166**	**0.0000**	**362.8876**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0326	0.0107	0.0856	3.3000e-004	0.0307	1.9000e-004	0.0309	8.1400e-003	1.7000e-004	8.3200e-003	0.0000	19.6865	19.6865	8.3000e-004	0.0000	19.7039
Total	**0.0326**	**0.0107**	**0.0856**	**3.3000e-004**	**0.0307**	**1.9000e-004**	**0.0309**	**8.1400e-003**	**1.7000e-004**	**8.3200e-003**	**0.0000**	**19.6865**	**19.6865**	**8.3000e-004**	**0.0000**	**19.7039**

3.4 Paving - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1589	1.4512	2.6022	4.1000e-003		0.0711	0.0711		0.0654	0.0654	0.0000	360.0108	360.0108	0.1164	0.0000	362.4559
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.1589**	**1.4512**	**2.6022**	**4.1000e-003**		**0.0711**	**0.0711**		**0.0654**	**0.0654**	**0.0000**	**360.0108**	**360.0108**	**0.1164**	**0.0000**	**362.4559**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0326	0.0107	0.0856	3.3000e-004	0.0307	1.9000e-004	0.0309	8.1400e-003	1.7000e-004	8.3200e-003	0.0000	19.6865	19.6865	8.3000e-004	0.0000	19.7039
Total	**0.0326**	**0.0107**	**0.0856**	**3.3000e-004**	**0.0307**	**1.9000e-004**	**0.0309**	**8.1400e-003**	**1.7000e-004**	**8.3200e-003**	**0.0000**	**19.6865**	**19.6865**	**8.3000e-004**	**0.0000**	**19.7039**

3.5 Architectural Coating - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0394					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0219	0.1485	0.2065	3.4000e-004		8.0700e-003	8.0700e-003		8.0700e-003	8.0700e-003	0.0000	29.1071	29.1071	1.7400e-003	0.0000	29.1437
Total	**1.0613**	**0.1485**	**0.2065**	**3.4000e-004**		**8.0700e-003**	**8.0700e-003**		**8.0700e-003**	**8.0700e-003**	**0.0000**	**29.1071**	**29.1071**	**1.7400e-003**	**0.0000**	**29.1437**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0162	5.7200e-003	0.0463	1.5000e-004	0.0140	9.0000e-005	0.0141	3.7200e-003	8.0000e-005	3.8000e-003	0.0000	9.3625	9.3625	4.3000e-004	0.0000	9.3715
Total	**0.0162**	**5.7200e-003**	**0.0463**	**1.5000e-004**	**0.0140**	**9.0000e-005**	**0.0141**	**3.7200e-003**	**8.0000e-005**	**3.8000e-003**	**0.0000**	**9.3625**	**9.3625**	**4.3000e-004**	**0.0000**	**9.3715**

3.5 Architectural Coating - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0394					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0218	0.1484	0.2062	3.4000e-004		8.0600e-003	8.0600e-003		8.0600e-003	8.0600e-003	0.0000	29.0725	29.0725	1.7400e-003	0.0000	29.1090
Total	**1.0612**	**0.1484**	**0.2062**	**3.4000e-004**		**8.0600e-003**	**8.0600e-003**		**8.0600e-003**	**8.0600e-003**	**0.0000**	**29.0725**	**29.0725**	**1.7400e-003**	**0.0000**	**29.1090**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0162	5.7200e-003	0.0463	1.5000e-004	0.0140	9.0000e-005	0.0141	3.7200e-003	8.0000e-005	3.8000e-003	0.0000	9.3625	9.3625	4.3000e-004	0.0000	9.3715
Total	**0.0162**	**5.7200e-003**	**0.0463**	**1.5000e-004**	**0.0140**	**9.0000e-005**	**0.0141**	**3.7200e-003**	**8.0000e-005**	**3.8000e-003**	**0.0000**	**9.3625**	**9.3625**	**4.3000e-004**	**0.0000**	**9.3715**

3.5 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1944					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1597	0.2371	3.9000e-004		7.9800e-003	7.9800e-003		7.9800e-003	7.9800e-003	0.0000	33.4476	33.4476	1.8800e-003	0.0000	33.4872
Total	**1.2181**	**0.1597**	**0.2371**	**3.9000e-004**		**7.9800e-003**	**7.9800e-003**		**7.9800e-003**	**7.9800e-003**	**0.0000**	**33.4476**	**33.4476**	**1.8800e-003**	**0.0000**	**33.4872**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0180	6.2000e-003	0.0502	1.7000e-004	0.0161	1.0000e-004	0.0162	4.2700e-003	9.0000e-005	4.3600e-003	0.0000	10.6222	10.6222	4.7000e-004	0.0000	10.6321
Total	**0.0180**	**6.2000e-003**	**0.0502**	**1.7000e-004**	**0.0161**	**1.0000e-004**	**0.0162**	**4.2700e-003**	**9.0000e-005**	**4.3600e-003**	**0.0000**	**10.6222**	**10.6222**	**4.7000e-004**	**0.0000**	**10.6321**

3.5 Architectural Coating - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1944					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0237	0.1595	0.2368	3.9000e-004		7.9700e-003	7.9700e-003		7.9700e-003	7.9700e-003	0.0000	33.4078	33.4078	1.8800e-003	0.0000	33.4473
Total	**1.2181**	**0.1595**	**0.2368**	**3.9000e-004**		**7.9700e-003**	**7.9700e-003**		**7.9700e-003**	**7.9700e-003**	**0.0000**	**33.4078**	**33.4078**	**1.8800e-003**	**0.0000**	**33.4473**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0180	6.2000e-003	0.0502	1.7000e-004	0.0161	1.0000e-004	0.0162	4.2700e-003	9.0000e-005	4.3600e-003	0.0000	10.6222	10.6222	4.7000e-004	0.0000	10.6321
Total	**0.0180**	**6.2000e-003**	**0.0502**	**1.7000e-004**	**0.0161**	**1.0000e-004**	**0.0162**	**4.2700e-003**	**9.0000e-005**	**4.3600e-003**	**0.0000**	**10.6222**	**10.6222**	**4.7000e-004**	**0.0000**	**10.6321**

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1898					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1495	0.2361	3.9000e-004		6.7200e-003	6.7200e-003		6.7200e-003	6.7200e-003	0.0000	33.3200	33.3200	1.8200e-003	0.0000	33.3581
Total	**1.2121**	**0.1495**	**0.2361**	**3.9000e-004**		**6.7200e-003**	**6.7200e-003**		**6.7200e-003**	**6.7200e-003**	**0.0000**	**33.3200**	**33.3200**	**1.8200e-003**	**0.0000**	**33.3581**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0175	5.8600e-003	0.0476	1.7000e-004	0.0160	1.0000e-004	0.0161	4.2500e-003	9.0000e-005	4.3500e-003	0.0000	10.4598	10.4598	4.6000e-004	0.0000	10.4694
Total	**0.0175**	**5.8600e-003**	**0.0476**	**1.7000e-004**	**0.0160**	**1.0000e-004**	**0.0161**	**4.2500e-003**	**9.0000e-005**	**4.3500e-003**	**0.0000**	**10.4598**	**10.4598**	**4.6000e-004**	**0.0000**	**10.4694**

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1898					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1493	0.2358	3.9000e-004		6.7100e-003	6.7100e-003		6.7100e-003	6.7100e-003	0.0000	33.2803	33.2803	1.8200e-003	0.0000	33.3185
Total	**1.2121**	**0.1493**	**0.2358**	**3.9000e-004**		**6.7100e-003**	**6.7100e-003**		**6.7100e-003**	**6.7100e-003**	**0.0000**	**33.2803**	**33.2803**	**1.8200e-003**	**0.0000**	**33.3185**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0175	5.8600e-003	0.0476	1.7000e-004	0.0160	1.0000e-004	0.0161	4.2500e-003	9.0000e-005	4.3500e-003	0.0000	10.4598	10.4598	4.6000e-004	0.0000	10.4694
Total	**0.0175**	**5.8600e-003**	**0.0476**	**1.7000e-004**	**0.0160**	**1.0000e-004**	**0.0161**	**4.2500e-003**	**9.0000e-005**	**4.3500e-003**	**0.0000**	**10.4598**	**10.4598**	**4.6000e-004**	**0.0000**	**10.4694**

3.5 Architectural Coating - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1898					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1495	0.2361	3.9000e-004		6.7200e-003	6.7200e-003		6.7200e-003	6.7200e-003	0.0000	33.3200	33.3200	1.8200e-003	0.0000	33.3581
Total	**1.2121**	**0.1495**	**0.2361**	**3.9000e-004**		**6.7200e-003**	**6.7200e-003**		**6.7200e-003**	**6.7200e-003**	**0.0000**	**33.3200**	**33.3200**	**1.8200e-003**	**0.0000**	**33.3581**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0170	5.5800e-003	0.0447	1.7000e-004	0.0160	1.0000e-004	0.0161	4.2500e-003	9.0000e-005	4.3400e-003	0.0000	10.2819	10.2819	4.3000e-004	0.0000	10.2911
Total	**0.0170**	**5.5800e-003**	**0.0447**	**1.7000e-004**	**0.0160**	**1.0000e-004**	**0.0161**	**4.2500e-003**	**9.0000e-005**	**4.3400e-003**	**0.0000**	**10.2819**	**10.2819**	**4.3000e-004**	**0.0000**	**10.2911**

3.5 Architectural Coating - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.1898					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0223	0.1493	0.2358	3.9000e-004		6.7100e-003	6.7100e-003		6.7100e-003	6.7100e-003	0.0000	33.2803	33.2803	1.8200e-003	0.0000	33.3185
Total	**1.2121**	**0.1493**	**0.2358**	**3.9000e-004**		**6.7100e-003**	**6.7100e-003**		**6.7100e-003**	**6.7100e-003**	**0.0000**	**33.2803**	**33.2803**	**1.8200e-003**	**0.0000**	**33.3185**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0170	5.5800e-003	0.0447	1.7000e-004	0.0160	1.0000e-004	0.0161	4.2500e-003	9.0000e-005	4.3400e-003	0.0000	10.2819	10.2819	4.3000e-004	0.0000	10.2911
Total	**0.0170**	**5.5800e-003**	**0.0447**	**1.7000e-004**	**0.0160**	**1.0000e-004**	**0.0161**	**4.2500e-003**	**9.0000e-005**	**4.3400e-003**	**0.0000**	**10.2819**	**10.2819**	**4.3000e-004**	**0.0000**	**10.2911**

3.6 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3673	3.6335	3.5556	6.4300e-003		0.1617	0.1617		0.1487	0.1487	0.0000	564.7092	564.7092	0.1826	0.0000	568.5446
Total	**0.3673**	**3.6335**	**3.5556**	**6.4300e-003**	**3.9119**	**0.1617**	**4.0736**	**1.4239**	**0.1487**	**1.5726**	**0.0000**	**564.7092**	**564.7092**	**0.1826**	**0.0000**	**568.5446**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.7100e-003	9.6900e-003	0.0239	6.0000e-005	4.0500e-003	2.3000e-004	4.2800e-003	1.0300e-003	2.1000e-004	1.2400e-003	0.0000	5.0089	5.0089	4.0000e-005	0.0000	5.0096
Vendor	9.2500e-003	0.0280	0.0588	1.9000e-004	5.5200e-003	6.7000e-004	6.1800e-003	1.5700e-003	6.1000e-004	2.1900e-003	0.0000	16.1312	16.1312	1.0000e-004	0.0000	16.1333
Worker	0.0604	0.0214	0.1726	5.6000e-004	0.0522	3.3000e-004	0.0525	0.0139	3.0000e-004	0.0142	0.0000	34.9412	34.9412	1.6000e-003	0.0000	34.9748
Total	**0.0724**	**0.0590**	**0.2552**	**8.1000e-004**	**0.0618**	**1.2300e-003**	**0.0630**	**0.0165**	**1.1200e-003**	**0.0176**	**0.0000**	**56.0813**	**56.0813**	**1.7400e-003**	**0.0000**	**56.1177**

3.6 Grading - 2023

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3668	3.6292	3.5514	6.4200e-003		0.1615	0.1615		0.1485	0.1485	0.0000	564.0374	564.0374	0.1824	0.0000	567.8683
Total	**0.3668**	**3.6292**	**3.5514**	**6.4200e-003**	**3.9119**	**0.1615**	**4.0734**	**1.4239**	**0.1485**	**1.5725**	**0.0000**	**564.0374**	**564.0374**	**0.1824**	**0.0000**	**567.8683**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.7100e-003	9.6900e-003	0.0239	6.0000e-005	0.7743	2.3000e-004	0.7745	0.1901	2.1000e-004	0.1903	0.0000	5.0089	5.0089	4.0000e-005	0.0000	5.0096
Vendor	9.2500e-003	0.0280	0.0588	1.9000e-004	5.5200e-003	6.7000e-004	6.1800e-003	1.5700e-003	6.1000e-004	2.1900e-003	0.0000	16.1312	16.1312	1.0000e-004	0.0000	16.1333
Worker	0.0604	0.0214	0.1726	5.6000e-004	0.0522	3.3000e-004	0.0525	0.0139	3.0000e-004	0.0142	0.0000	34.9412	34.9412	1.6000e-003	0.0000	34.9748
Total	**0.0724**	**0.0590**	**0.2552**	**8.1000e-004**	**0.8320**	**1.2300e-003**	**0.8332**	**0.2055**	**1.1200e-003**	**0.2067**	**0.0000**	**56.0813**	**56.0813**	**1.7400e-003**	**0.0000**	**56.1177**

3.6 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4402	4.2173	4.3812	8.1000e-003		0.1865	0.1865		0.1716	0.1716	0.0000	711.1487	711.1487	0.2300	0.0000	715.9787
Total	**0.4402**	**4.2173**	**4.3812**	**8.1000e-003**	**3.9119**	**0.1865**	**4.0984**	**1.4239**	**0.1716**	**1.5955**	**0.0000**	**711.1487**	**711.1487**	**0.2300**	**0.0000**	**715.9787**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2400e-003	0.0121	0.0293	7.0000e-005	4.1300e-003	2.9000e-004	4.4200e-003	1.0600e-003	2.7000e-004	1.3300e-003	0.0000	6.3139	6.3139	5.0000e-005	0.0000	6.3149
Vendor	0.0111	0.0348	0.0713	2.4000e-004	6.9500e-003	8.5000e-004	7.8000e-003	1.9800e-003	7.8000e-004	2.7600e-003	0.0000	20.3315	20.3315	1.3000e-004	0.0000	20.3342
Worker	0.0736	0.0254	0.2053	7.1000e-004	0.0658	4.1000e-004	0.0662	0.0175	3.8000e-004	0.0179	0.0000	43.4543	43.4543	1.9400e-003	0.0000	43.4951
Total	**0.0880**	**0.0722**	**0.3058**	**1.0200e-003**	**0.0768**	**1.5500e-003**	**0.0784**	**0.0205**	**1.4300e-003**	**0.0219**	**0.0000**	**70.0997**	**70.0997**	**2.1200e-003**	**0.0000**	**70.1441**

3.6 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4396	4.2122	4.3760	8.0900e-003		0.1863	0.1863		0.1714	0.1714	0.0000	710.3028	710.3028	0.2297	0.0000	715.1270
Total	**0.4396**	**4.2122**	**4.3760**	**8.0900e-003**	**3.9119**	**0.1863**	**4.0982**	**1.4239**	**0.1714**	**1.5953**	**0.0000**	**710.3028**	**710.3028**	**0.2297**	**0.0000**	**715.1270**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.2400e-003	0.0121	0.0293	7.0000e-005	0.9753	2.9000e-004	0.9756	0.2394	2.7000e-004	0.2397	0.0000	6.3139	6.3139	5.0000e-005	0.0000	6.3149
Vendor	0.0111	0.0348	0.0713	2.4000e-004	6.9500e-003	8.5000e-004	7.8000e-003	1.9800e-003	7.8000e-004	2.7600e-003	0.0000	20.3315	20.3315	1.3000e-004	0.0000	20.3342
Worker	0.0736	0.0254	0.2053	7.1000e-004	0.0658	4.1000e-004	0.0662	0.0175	3.8000e-004	0.0179	0.0000	43.4543	43.4543	1.9400e-003	0.0000	43.4951
Total	**0.0880**	**0.0722**	**0.3058**	**1.0200e-003**	**1.0480**	**1.5500e-003**	**1.0495**	**0.2589**	**1.4300e-003**	**0.2603**	**0.0000**	**70.0997**	**70.0997**	**2.1200e-003**	**0.0000**	**70.1441**

3.6 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3918	3.5575	4.0914	8.0600e-003		0.1549	0.1549		0.1425	0.1425	0.0000	708.2364	708.2364	0.2291	0.0000	713.0466
Total	**0.3918**	**3.5575**	**4.0914**	**8.0600e-003**	**3.9119**	**0.1549**	**4.0668**	**1.4239**	**0.1425**	**1.5664**	**0.0000**	**708.2364**	**708.2364**	**0.2291**	**0.0000**	**713.0466**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.1800e-003	0.0119	0.0289	7.0000e-005	4.1300e-003	2.9000e-004	4.4200e-003	1.0600e-003	2.7000e-004	1.3300e-003	0.0000	6.2955	6.2955	5.0000e-005	0.0000	6.2965
Vendor	0.0110	0.0344	0.0698	2.4000e-004	6.9300e-003	8.5000e-004	7.7700e-003	1.9700e-003	7.8000e-004	2.7500e-003	0.0000	20.2716	20.2716	1.3000e-004	0.0000	20.2743
Worker	0.0714	0.0240	0.1948	7.1000e-004	0.0655	4.1000e-004	0.0659	0.0174	3.8000e-004	0.0178	0.0000	42.7899	42.7899	1.8700e-003	0.0000	42.8292
Total	**0.0856**	**0.0702**	**0.2935**	**1.0200e-003**	**0.0766**	**1.5500e-003**	**0.0781**	**0.0204**	**1.4300e-003**	**0.0219**	**0.0000**	**69.3570**	**69.3570**	**2.0500e-003**	**0.0000**	**69.4000**

3.6 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.3913	3.5533	4.0865	8.0500e-003		0.1547	0.1547		0.1423	0.1423	0.0000	707.3939	707.3939	0.2288	0.0000	712.1984
Total	**0.3913**	**3.5533**	**4.0865**	**8.0500e-003**	**3.9119**	**0.1547**	**4.0666**	**1.4239**	**0.1423**	**1.5662**	**0.0000**	**707.3939**	**707.3939**	**0.2288**	**0.0000**	**712.1984**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.1800e-003	0.0119	0.0289	7.0000e-005	0.9716	2.9000e-004	0.9718	0.2385	2.7000e-004	0.2388	0.0000	6.2955	6.2955	5.0000e-005	0.0000	6.2965
Vendor	0.0110	0.0344	0.0698	2.4000e-004	6.9300e-003	8.5000e-004	7.7700e-003	1.9700e-003	7.8000e-004	2.7500e-003	0.0000	20.2716	20.2716	1.3000e-004	0.0000	20.2743
Worker	0.0714	0.0240	0.1948	7.1000e-004	0.0655	4.1000e-004	0.0659	0.0174	3.8000e-004	0.0178	0.0000	42.7899	42.7899	1.8700e-003	0.0000	42.8292
Total	**0.0856**	**0.0702**	**0.2935**	**1.0200e-003**	**1.0440**	**1.5500e-003**	**1.0455**	**0.2579**	**1.4300e-003**	**0.2593**	**0.0000**	**69.3570**	**69.3570**	**2.0500e-003**	**0.0000**	**69.4000**

3.6 Grading - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0330	0.2999	0.3449	6.8000e-004		0.0131	0.0131		0.0120	0.0120	0.0000	59.6981	59.6981	0.0193	0.0000	60.1036
Total	**0.0330**	**0.2999**	**0.3449**	**6.8000e-004**	**3.9119**	**0.0131**	**3.9250**	**1.4239**	**0.0120**	**1.4359**	**0.0000**	**59.6981**	**59.6981**	**0.0193**	**0.0000**	**60.1036**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.8000e-004	2.3500e-003	1.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	9.3000e-004	2.0000e-005	9.5000e-004	0.0000	0.5309	0.5309	0.0000	0.0000	0.5309
Vendor	9.1000e-004	2.8500e-003	5.6600e-003	2.0000e-005	5.8000e-004	7.0000e-005	6.6000e-004	1.7000e-004	7.0000e-005	2.3000e-004	0.0000	1.7097	1.7097	1.0000e-005	0.0000	1.7099
Worker	5.8700e-003	1.9200e-003	0.0154	6.0000e-005	5.5200e-003	3.0000e-005	5.5600e-003	1.4700e-003	3.0000e-005	1.5000e-003	0.0000	3.5455	3.5455	1.5000e-004	0.0000	3.5487
Total	**7.0400e-003**	**5.7500e-003**	**0.0234**	**9.0000e-005**	**9.8600e-003**	**1.2000e-004**	**1.0000e-002**	**2.5700e-003**	**1.2000e-004**	**2.6800e-003**	**0.0000**	**5.7861**	**5.7861**	**1.6000e-004**	**0.0000**	**5.7895**

3.6 Grading - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.9119	0.0000	3.9119	1.4239	0.0000	1.4239	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0330	0.2995	0.3445	6.8000e-004		0.0130	0.0130		0.0120	0.0120	0.0000	59.6271	59.6271	0.0193	0.0000	60.0321
Total	**0.0330**	**0.2995**	**0.3445**	**6.8000e-004**	**3.9119**	**0.0130**	**3.9249**	**1.4239**	**0.0120**	**1.4359**	**0.0000**	**59.6271**	**59.6271**	**0.0193**	**0.0000**	**60.0321**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.6000e-004	9.8000e-004	2.3500e-003	1.0000e-005	0.0819	2.0000e-005	0.0819	0.0201	2.0000e-005	0.0201	0.0000	0.5309	0.5309	0.0000	0.0000	0.5309
Vendor	9.1000e-004	2.8500e-003	5.6600e-003	2.0000e-005	5.8000e-004	7.0000e-005	6.6000e-004	1.7000e-004	7.0000e-005	2.3000e-004	0.0000	1.7097	1.7097	1.0000e-005	0.0000	1.7099
Worker	5.8700e-003	1.9200e-003	0.0154	6.0000e-005	5.5200e-003	3.0000e-005	5.5600e-003	1.4700e-003	3.0000e-005	1.5000e-003	0.0000	3.5455	3.5455	1.5000e-004	0.0000	3.5487
Total	**7.0400e-003**	**5.7500e-003**	**0.0234**	**9.0000e-005**	**0.0880**	**1.2000e-004**	**0.0881**	**0.0218**	**1.2000e-004**	**0.0219**	**0.0000**	**5.7861**	**5.7861**	**1.6000e-004**	**0.0000**	**5.7895**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.0714	1.4698	7.4212	0.0214	1.5869	0.0235	1.6104	0.4250	0.0217	0.4467	0.0000	1,428.4057	1,428.4057	0.0492	0.0000	1,429.4394
Unmitigated	2.0714	1.4698	7.4212	0.0214	1.5869	0.0235	1.6104	0.4250	0.0217	0.4467	0.0000	1,428.4057	1,428.4057	0.0492	0.0000	1,429.4394

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	1,368.51	1,368.51	1368.51	3,775,899	3,775,899
User Defined Recreational	275.48	275.48	275.48	428,354	428,354
Total	1,643.99	1,643.99	1,643.99	4,204,252	4,204,252

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	12.30	5.90	6.40	37.50	15.00	47.50	86	11	3
User Defined Recreational	8.80	4.60	4.60	5.00	0.00	95.00	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.489821	0.036204	0.210874	0.153026	0.049322	0.007389	0.020723	0.015503	0.002015	0.002209	0.008256	0.001515	0.003143

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
NaturalGas Mitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
NaturalGas Unmitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.6572	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695
Unmitigated	1.6572	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4614					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1640					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0319	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695
Total	**1.6572**	**0.0122**	**1.0609**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7346**	**1.7346**	**1.6600e-003**	**0.0000**	**1.7695**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4614					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1640					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0319	0.0122	1.0609	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6600e-003	0.0000	1.7695
Total	**1.6572**	**0.0122**	**1.0609**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7346**	**1.7346**	**1.6600e-003**	**0.0000**	**1.7695**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	130.8380	0.0854	0.0521	148.7825
Unmitigated	130.8380	0.0859	0.0522	148.8200

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0859	0.0522	148.8200
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**130.8380**	**0.0859**	**0.0522**	**148.8200**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0854	0.0521	148.7825
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**130.8380**	**0.0854**	**0.0521**	**148.7825**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	37.9593	2.2433	0.0000	85.0693
Unmitigated	37.9593	2.2433	0.0000	85.0693

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
User Defined Recreational	30	6.0897	0.3599	0.0000	13.6475
Total		**37.9593**	**2.2433**	**0.0000**	**85.0693**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
User Defined Recreational	30	6.0897	0.3599	0.0000	13.6475
Total		**37.9593**	**2.2433**	**0.0000**	**85.0693**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Chumash Camp 4, Alt A

Santa Barbara County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Single Family Housing	143.00	Dwelling Unit	715.00	286,000.00	374

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.9	**Precipitation Freq (Days)**	37
Climate Zone	4			**Operational Year**	2030
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot size is 5 acres. 2.61 persons per dwelling unit. Square footage based on 2,000 square feet residential units.

Construction Phase - Construction will begin in 2023 and last for four years.

Off-road Equipment - Additional paving will be needed for Tribal Hall parking.

Trips and VMT - Trip lenth is estimated to be 15 miles. Grading trips are consistent with the noise analysis.

Grading - Conservative estimate of disturbed land based on lot size, includes infrustructure.

Vehicle Trips - Trip Rate consistent with TIA and trip percentage default consistent with the ITE Manual.

Woodstoves - Now woodfired combustion units will be installed.

Water And Wastewater - Based on 335 acre feet per year, Section 4.1.2.

Solid Waste - Per Public Service Section.

Construction Off-road Equipment Mitigation - Clean paved roadways adjacent to soil haul route entrance twice a day.

Mobile Land Use Mitigation -

Area Mitigation -

Energy Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	480.00	1.00
tblLandUse	LandUseSquareFeet	257,400.00	286,000.00
tblLandUse	LotAcreage	46.43	715.00
tblLandUse	Population	389.00	374.00
tblProjectCharacteristics	OperationalYear	2014	2030
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	153.34	157.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblVehicleTrips	ST_TR	10.08	9.57
tblVehicleTrips	SU_TR	8.77	9.57
tblWater	IndoorWaterUseRate	9,317,025.66	66,526,740.00
tblWater	OutdoorWaterUseRate	5,873,777.05	2,533,490.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	2.8400e-003	0.0285	0.0221	2.0000e-005	9.1300e-003	1.5400e-003	0.0107	4.9900e-003	1.4200e-003	6.4100e-003	0.0000	1.9501	1.9501	5.6000e-004	0.0000	1.9619
Total	**2.8400e-003**	**0.0285**	**0.0221**	**2.0000e-005**	**9.1300e-003**	**1.5400e-003**	**0.0107**	**4.9900e-003**	**1.4200e-003**	**6.4100e-003**	**0.0000**	**1.9501**	**1.9501**	**5.6000e-004**	**0.0000**	**1.9619**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	2.8300e-003	0.0285	0.0221	2.0000e-005	9.1300e-003	1.5400e-003	0.0107	4.9900e-003	1.4200e-003	6.4100e-003	0.0000	1.9479	1.9479	5.6000e-004	0.0000	1.9597
Total	**2.8300e-003**	**0.0285**	**0.0221**	**2.0000e-005**	**9.1300e-003**	**1.5400e-003**	**0.0107**	**4.9900e-003**	**1.4200e-003**	**6.4100e-003**	**0.0000**	**1.9479**	**1.9479**	**5.6000e-004**	**0.0000**	**1.9597**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.35**	**0.11**	**0.14**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.11**	**0.11**	**0.00**	**0.00**	**0.11**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.5960	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.7020	1.1141	5.5949	0.0191	1.4255	0.0209	1.4464	0.3818	0.0193	0.4011	0.0000	1,246.3171	1,246.3171	0.0373	0.0000	1,247.1003
Waste						0.0000	0.0000		0.0000	0.0000	31.8696	0.0000	31.8696	1.8834	0.0000	71.4218
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0859	0.0522	148.8200
Total	**3.3252**	**1.3588**	**6.7528**	**0.0206**	**1.4255**	**0.0456**	**1.4710**	**0.3818**	**0.0440**	**0.4258**	**55.4068**	**1,918.8341**	**1,974.2409**	**2.0267**	**0.0599**	**2,035.3644**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.5960	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.7020	1.1141	5.5949	0.0191	1.4255	0.0209	1.4464	0.3818	0.0193	0.4011	0.0000	1,246.3171	1,246.3171	0.0373	0.0000	1,247.1003
Waste						0.0000	0.0000		0.0000	0.0000	31.8696	0.0000	31.8696	1.8834	0.0000	71.4218
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0854	0.0521	148.7825
Total	**3.3252**	**1.3588**	**6.7528**	**0.0206**	**1.4255**	**0.0456**	**1.4710**	**0.3818**	**0.0440**	**0.4258**	**55.4068**	**1,918.8341**	**1,974.2409**	**2.0263**	**0.0598**	**2,035.3268**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.15**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2015	1/1/2015	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	15.00	15.00	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.0300e-003	0.0000	9.0300e-003	4.9700e-003	0.0000	4.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6300e-003	0.0284	0.0213	2.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	1.8651	1.8651	5.6000e-004	0.0000	1.8768
Total	**2.6300e-003**	**0.0284**	**0.0213**	**2.0000e-005**	**9.0300e-003**	**1.5400e-003**	**0.0106**	**4.9700e-003**	**1.4200e-003**	**6.3900e-003**	**0.0000**	**1.8651**	**1.8651**	**5.6000e-004**	**0.0000**	**1.8768**

3.2 Site Preparation - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	9.0000e-005	7.6000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0851	0.0851	1.0000e-005	0.0000	0.0852
Total	**2.1000e-004**	**9.0000e-005**	**7.6000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0851**	**0.0851**	**1.0000e-005**	**0.0000**	**0.0852**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.0300e-003	0.0000	9.0300e-003	4.9700e-003	0.0000	4.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6300e-003	0.0284	0.0213	2.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	1.8628	1.8628	5.6000e-004	0.0000	1.8745
Total	**2.6300e-003**	**0.0284**	**0.0213**	**2.0000e-005**	**9.0300e-003**	**1.5400e-003**	**0.0106**	**4.9700e-003**	**1.4200e-003**	**6.3900e-003**	**0.0000**	**1.8628**	**1.8628**	**5.6000e-004**	**0.0000**	**1.8745**

3.2 Site Preparation - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	9.0000e-005	7.6000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0851	0.0851	1.0000e-005	0.0000	0.0852
Total	**2.1000e-004**	**9.0000e-005**	**7.6000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0851**	**0.0851**	**1.0000e-005**	**0.0000**	**0.0852**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.7020	1.1141	5.5949	0.0191	1.4255	0.0209	1.4464	0.3818	0.0193	0.4011	0.0000	1,246.3171	1,246.3171	0.0373	0.0000	1,247.1003
Unmitigated	1.7020	1.1141	5.5949	0.0191	1.4255	0.0209	1.4464	0.3818	0.0193	0.4011	0.0000	1,246.3171	1,246.3171	0.0373	0.0000	1,247.1003

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	1,368.51	1,368.51	1368.51	3,775,899	3,775,899
Total	1,368.51	1,368.51	1,368.51	3,775,899	3,775,899

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	12.30	5.90	6.40	37.50	15.00	47.50	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.491343	0.035803	0.209975	0.151446	0.049404	0.007294	0.021229	0.016420	0.002108	0.002167	0.008276	0.001461	0.003075

4.4 Fleet Mix

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
NaturalGas Mitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
NaturalGas Unmitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5960	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691
Unmitigated	1.5960	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1170					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0317	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691
Total	**1.5960**	**0.0122**	**1.0590**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7344**	**1.7344**	**1.6500e-003**	**0.0000**	**1.7691**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4474					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1170					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0317	0.0122	1.0590	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7344	1.7344	1.6500e-003	0.0000	1.7691
Total	**1.5960**	**0.0122**	**1.0590**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7344**	**1.7344**	**1.6500e-003**	**0.0000**	**1.7691**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	130.8380	0.0854	0.0521	148.7825
Unmitigated	130.8380	0.0859	0.0522	148.8200

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0859	0.0522	148.8200
Total		**130.8380**	**0.0859**	**0.0522**	**148.8200**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0854	0.0521	148.7825
Total		**130.8380**	**0.0854**	**0.0521**	**148.7825**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	31.8696	1.8834	0.0000	71.4218
Unmitigated	31.8696	1.8834	0.0000	71.4218

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
Total		**31.8696**	**1.8834**	**0.0000**	**71.4218**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
Total		**31.8696**	**1.8834**	**0.0000**	**71.4218**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Chumash Camp 4, Alt B

Santa Barbara County APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Recreational	12.04	User Defined Unit	1.00	12,042.00	276
Single Family Housing	143.00	Dwelling Unit	715.00	286,000.00	374

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.9	**Precipitation Freq (Days)**	37
Climate Zone	4			**Operational Year**	2030
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot size is 5 acres. 2.61 persons per dwelling unit. Square footage based on 2,000 square feet residential units.

Construction Phase - Construction will begin in 2023 and last for four years.

Off-road Equipment - Additional paving will be needed for Tribal Hall parking.

Trips and VMT - Trip lenth is estimated to be 15 miles. Grading trips are consistent with the noise analysis.

Grading - Conservative estimate of disturbed land based on lot size, includes infrustructure.

Vehicle Trips - Trip Rate consistent with TIA and trip percentage default consistent with the ITE Manual.

Woodstoves - Now woodfired combustion units will be installed.

Water And Wastewater - Based on 335 acre feet per year, Section 4.1.2. Alternative B would reduce outdoor water consumption due to reduced lot size.

Solid Waste - Per Public Service Section.

Construction Off-road Equipment Mitigation - Clean paved roadways adjacent to soil haul route entrance twice a day.

Mobile Land Use Mitigation -

Area Mitigation -

Energy Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	480.00	1.00
tblLandUse	LandUseSquareFeet	0.00	12,042.00
tblLandUse	LandUseSquareFeet	257,400.00	286,000.00
tblLandUse	LotAcreage	0.00	1.00
tblLandUse	LotAcreage	46.43	715.00
tblLandUse	Population	0.00	276.00
tblLandUse	Population	389.00	374.00
tblProjectCharacteristics	OperationalYear	2014	2030
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	153.34	157.00
tblSolidWaste	SolidWasteGenerationRate	0.00	30.00
tblTripsAndVMT	VendorTripLength	4.60	15.00
tblTripsAndVMT	WorkerTripLength	12.30	15.00
tblVehicleTrips	CNW_TTP	0.00	95.00
tblVehicleTrips	CW_TTP	0.00	5.00
tblVehicleTrips	DV_TP	0.00	11.00
tblVehicleTrips	PB_TP	0.00	3.00
tblVehicleTrips	PR_TP	0.00	86.00
tblVehicleTrips	ST_TR	10.08	9.57
tblVehicleTrips	ST_TR	0.00	22.88
tblVehicleTrips	SU_TR	8.77	9.57
tblVehicleTrips	SU_TR	0.00	22.88
tblVehicleTrips	WD_TR	0.00	22.88
tblWater	IndoorWaterUseRate	9,317,025.66	66,526,740.00
tblWater	OutdoorWaterUseRate	5,873,777.05	2,533,490.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	2.8400e-003	0.0285	0.0221	2.0000e-005	9.1300e-003	1.5400e-003	0.0107	4.9900e-003	1.4200e-003	6.4100e-003	0.0000	1.9501	1.9501	5.6000e-004	0.0000	1.9619
Total	**2.8400e-003**	**0.0285**	**0.0221**	**2.0000e-005**	**9.1300e-003**	**1.5400e-003**	**0.0107**	**4.9900e-003**	**1.4200e-003**	**6.4100e-003**	**0.0000**	**1.9501**	**1.9501**	**5.6000e-004**	**0.0000**	**1.9619**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2015	2.8300e-003	0.0285	0.0221	2.0000e-005	9.1300e-003	1.5400e-003	0.0107	4.9900e-003	1.4200e-003	6.4100e-003	0.0000	1.9479	1.9479	5.6000e-004	0.0000	1.9597
Total	**2.8300e-003**	**0.0285**	**0.0221**	**2.0000e-005**	**9.1300e-003**	**1.5400e-003**	**0.0107**	**4.9900e-003**	**1.4200e-003**	**6.4100e-003**	**0.0000**	**1.9479**	**1.9479**	**5.6000e-004**	**0.0000**	**1.9597**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.35**	**0.11**	**0.14**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.11**	**0.11**	**0.00**	**0.00**	**0.11**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6570	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.9118	1.2602	6.3838	0.0213	1.5872	0.0235	1.6107	0.4251	0.0217	0.4468	0.0000	1,391.2413	1,391.2413	0.0418	0.0000	1,392.1199
Waste						0.0000	0.0000		0.0000	0.0000	37.9593	0.0000	37.9593	2.2433	0.0000	85.0693
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0859	0.0522	148.8200
Total	**3.5961**	**1.5049**	**7.5419**	**0.0228**	**1.5872**	**0.0482**	**1.6354**	**0.4251**	**0.0464**	**0.4715**	**61.4966**	**2,063.7586**	**2,125.2551**	**2.3912**	**0.0599**	**2,194.0317**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6570	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694
Energy	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	563.4818	563.4818	0.0185	7.6900e-003	566.2531
Mobile	1.9118	1.2602	6.3838	0.0213	1.5872	0.0235	1.6107	0.4251	0.0217	0.4468	0.0000	1,391.2413	1,391.2413	0.0418	0.0000	1,392.1199
Waste						0.0000	0.0000		0.0000	0.0000	37.9593	0.0000	37.9593	2.2433	0.0000	85.0693
Water						0.0000	0.0000		0.0000	0.0000	23.5373	107.3008	130.8380	0.0854	0.0521	148.7825
Total	**3.5961**	**1.5049**	**7.5419**	**0.0228**	**1.5872**	**0.0482**	**1.6354**	**0.4251**	**0.0464**	**0.4715**	**61.4966**	**2,063.7586**	**2,125.2551**	**2.3907**	**0.0598**	**2,193.9941**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.02**	**0.15**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2015	1/1/2015	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	255	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	15.00	15.00	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2015

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.0300e-003	0.0000	9.0300e-003	4.9700e-003	0.0000	4.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6300e-003	0.0284	0.0213	2.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	1.8651	1.8651	5.6000e-004	0.0000	1.8768
Total	**2.6300e-003**	**0.0284**	**0.0213**	**2.0000e-005**	**9.0300e-003**	**1.5400e-003**	**0.0106**	**4.9700e-003**	**1.4200e-003**	**6.3900e-003**	**0.0000**	**1.8651**	**1.8651**	**5.6000e-004**	**0.0000**	**1.8768**

3.2 Site Preparation - 2015

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	9.0000e-005	7.6000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0851	0.0851	1.0000e-005	0.0000	0.0852
Total	**2.1000e-004**	**9.0000e-005**	**7.6000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0851**	**0.0851**	**1.0000e-005**	**0.0000**	**0.0852**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.0300e-003	0.0000	9.0300e-003	4.9700e-003	0.0000	4.9700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6300e-003	0.0284	0.0213	2.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	1.8628	1.8628	5.6000e-004	0.0000	1.8745
Total	**2.6300e-003**	**0.0284**	**0.0213**	**2.0000e-005**	**9.0300e-003**	**1.5400e-003**	**0.0106**	**4.9700e-003**	**1.4200e-003**	**6.3900e-003**	**0.0000**	**1.8628**	**1.8628**	**5.6000e-004**	**0.0000**	**1.8745**

3.2 Site Preparation - 2015

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	9.0000e-005	7.6000e-004	0.0000	1.0000e-004	0.0000	1.0000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0851	0.0851	1.0000e-005	0.0000	0.0852
Total	**2.1000e-004**	**9.0000e-005**	**7.6000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.0851**	**0.0851**	**1.0000e-005**	**0.0000**	**0.0852**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.9118	1.2602	6.3838	0.0213	1.5872	0.0235	1.6107	0.4251	0.0217	0.4468	0.0000	1,391.2413	1,391.2413	0.0418	0.0000	1,392.1199
Unmitigated	1.9118	1.2602	6.3838	0.0213	1.5872	0.0235	1.6107	0.4251	0.0217	0.4468	0.0000	1,391.2413	1,391.2413	0.0418	0.0000	1,392.1199

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Single Family Housing	1,368.51	1,368.51	1368.51	3,775,899	3,775,899
User Defined Recreational	275.48	275.48	275.48	428,354	428,354
Total	1,643.99	1,643.99	1,643.99	4,204,252	4,204,252

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Single Family Housing	12.30	5.90	6.40	37.50	15.00	47.50	86	11	3
User Defined Recreational	8.80	4.60	4.60	5.00	0.00	95.00	86	11	3

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.491343	0.035803	0.209975	0.151446	0.049404	0.007294	0.021229	0.016420	0.002108	0.002167	0.008276	0.001461	0.003075

5.0 Energy Detail

4.4 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.2367	294.2367	0.0133	2.7500e-003	295.3694
NaturalGas Mitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
NaturalGas Unmitigated	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	5.04546e+006	0.0272	0.2325	0.0989	1.4800e-003		0.0188	0.0188		0.0188	0.0188	0.0000	269.2451	269.2451	5.1600e-003	4.9400e-003	270.8837
Total		**0.0272**	**0.2325**	**0.0989**	**1.4800e-003**		**0.0188**	**0.0188**		**0.0188**	**0.0188**	**0.0000**	**269.2451**	**269.2451**	**5.1600e-003**	**4.9400e-003**	**270.8837**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Single Family Housing	1.01143e+006	294.2367	0.0133	2.7500e-003	295.3694
User Defined Recreational	0	0.0000	0.0000	0.0000	0.0000
Total		**294.2367**	**0.0133**	**2.7500e-003**	**295.3694**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.6570	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694
Unmitigated	1.6570	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4614					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1640					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0317	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694
Total	**1.6570**	**0.0122**	**1.0591**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7346**	**1.7346**	**1.6500e-003**	**0.0000**	**1.7694**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4614					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.1640					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0317	0.0122	1.0591	6.0000e-005		5.8900e-003	5.8900e-003		5.8900e-003	5.8900e-003	0.0000	1.7346	1.7346	1.6500e-003	0.0000	1.7694
Total	**1.6570**	**0.0122**	**1.0591**	**6.0000e-005**		**5.8900e-003**	**5.8900e-003**		**5.8900e-003**	**5.8900e-003**	**0.0000**	**1.7346**	**1.7346**	**1.6500e-003**	**0.0000**	**1.7694**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	130.8380	0.0854	0.0521	148.7825
Unmitigated	130.8380	0.0859	0.0522	148.8200

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0859	0.0522	148.8200
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**130.8380**	**0.0859**	**0.0522**	**148.8200**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Single Family Housing	66.5267 / 2.53349	130.8380	0.0854	0.0521	148.7825
User Defined Recreational	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**130.8380**	**0.0854**	**0.0521**	**148.7825**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Unmitigated	37.9593	2.2433	0.0000	85.0693
Mitigated	37.9593	2.2433	0.0000	85.0693

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
User Defined Recreational	30	6.0897	0.3599	0.0000	13.6475
Total		**37.9593**	**2.2433**	**0.0000**	**85.0693**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Single Family Housing	157	31.8696	1.8834	0.0000	71.4218
User Defined Recreational	30	6.0897	0.3599	0.0000	13.6475
Total		**37.9593**	**2.2433**	**0.0000**	**85.0693**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

APPENDIX C

WATER AND WASTEWATER FEASIBILITY ANALYSIS (REVISED)

UPDATED WATER AND WASTEWATER FEASIBILITY ANALYSIS

FOR CHUMASH CAMP 4 PROPERTY FEE-TO-TRUST APPLICATION ENVIRONMENTAL ASSESSMENT

Prepared for:

Analytical Environmental Services, Inc,
Sacramento, California

Prepared by:

612 Clarion Court
SAN LUIS OBISPO, CA 93401
T 805 544-4011 F 805 544-4294

Job Number: 1113-0001
April 28, 2014

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

CHAPTER 1

INTRODUCTION

The Santa Ynez Band of Chumash Indians (Tribe) proposes a project to develop approximately 1,433 acres of land as part of a trust land acquisition. This water and wastewater technical feasibility study is in support of the Environmental Assessment (EA) prepared in support of the Tribe's application for the Bureau of Indian Affairs (BIA) to take the 1,433-acre Project into Trust. by the Tribe to reduce potential adverse impacts to environmental resources. The EA is being prepared by Analytical Environmental Services (AES), Sacramento, California. The project alternatives evaluated in this EA consist of:

Alternative A (Proposed Project) – 1,433± acre trust land acquisition and development of 143 five-acre residential lots for Tribal members. The remaining land uses would entail 206 acres of vineyards (reducing the existing 256 acres of vineyards by 50 acres), 256 acres of open space/recreational , 131 acres of riparian corridor and oak woodland conservation, and 3 acres of Special Purpose Zone- Utilities;

Alternative B (Reduced Development Intensity Alternative) – Identical trust land acquisition and development of 143 one-acre residential lots for Tribal members. The remaining land uses would entail 825 acres of open space/recreational, 30 acres of Tribal Government/Development (including 12,042 square feet of Tribal facilities), and the same acreages of vineyard, riparian corridor and oak woodland conservation, and utilities land uses as proposed under Alternative A; and

Alternative C (No Action Alternative) – No federal action or proposed development. The "No Action" alternative is not discussed further in this report, as no technical evaluation is warranted for this alternative. While there will be no development of structures under the "No Action Alternative" the Tribe can and will be increasing the size of the vineyard by 44 acres which will increase water use by 44 AFY.

A summary of project components under the two development alternatives (A and B) is provided in Table 1-1. Full details of the Project Descriptions and alternatives can be found in the EA prepared by AES for this Project.

ALTERNATIVE A – PROPOSED PROJECT

Alternative A consists of two main components: (1) the placement of 5 parcels totaling approximately 1,433± acres into Federal trust status for the Tribe; and (2) the development of 143 five-acre residential plots with the remaining acreage dedicated to agriculture, open space/recreational, conservation of riparian corridors and oak woodland, and development of utilities. Development of the site would include domestic water connections, a wastewater treatment plant (WWTP), and supporting roads and infrastructure. Alternative A is described in more detail in the following sections.

TABLE 1-1

SUMMARY OF PROJECT DEVELOPMENT ALTERNATIVES[a]

Project Components	Alternative	
	A	B
Land Taken into Trust	1,433± acres	1,433± acres
Residential Development	143 five-acre lots	143 one-acre lots
Designated Tribal Land Uses	206 acres of Agriculture (existing), 256 acres of Open Space/Recreational – General/Trails, 98 acres of Resource Management Zone – Riparian Corridors, 33 acres of Resource Management Zone – Oak Woodland, and 3 acres of Special Purpose Zone- Utilities	206 acres of Agriculture (existing), 825 acres of Open Space/Recreational – General/Trails, and 30 acres of Special Purpose Zone -Tribal Government/Development 98 acres of Resource Management Zone – Riparian Corridors, 33 acres of Resource Management Zone – Oak Woodland, and 3 acres of Special Purpose Zone- Utilities
Water Source	Groundwater	Groundwater
Wastewater Treatment	Onsite WWTP	Onsite WWTP

[a]*Source: AES, 2012*

Proposed Residential Development.

Under Alternative A, the Tribe would develop residential plots on Parcels 2, 3 and 4 of the project site. The proposed housing would consist of up to 143 five-acre residential plots with construction of single-family detached houses of varying sizes ranging from 3,000 to 5,000 square feet. Development on each five-acre plot would include approximately 0.65 acres of disturbance for building pad development, driveway construction, utility installations, and landscaping. Additionally, new domestic water connections, improved access roads, driveways, a new wastewater treatment plant, and utilities would also be constructed to support the residences. A site plan identifying the proposed residential plots is shown in Figure 1-1.

Designated Tribal Land Uses

In addition to the proposed residential development, the Tribe would designate the following land uses on the subject property:

Agricultural

The Tribe would continue operating an existing 256-acre vineyard located on Parcel 1 and a portion of Parcel 2 (refer to Figure 1-1); however, for Alternatives A and B, the vineyard size will be reduced by 50 acres resulting in a vineyard area of 206 acres. The 256-acre vineyard is currently in operation and includes a storage reservoir, existing access roadways, and a processing/shipping area. No winemaking facilities are currently located on the project site, and there are no plans to develop a winery on the project site. Various structures are located within the agricultural lands including an old abandoned house and operational horse stables.

Open Space/Recreational – General/Trails

Approximately 256 acres of the project site would be designated as open space and recreation. Passive trails would be designated for pedestrian use and equestrian trails would be developed to provide recreation for residents and guests in coordination with the horse stables located on the existing agricultural lands. The open space/recreational area adjacent to State Route (SR) 154 would be utilized as a viewshed protection zone. No residential development is planned within the zone adjacent to SR-154 to protect the viewshed of the scenic highway.

Special Purpose Zone- Utilities (WWTP)

To support the development of residential plots, a central tertiary WWTP would be developed on three acres of the agricultural lands. The tertiary WWTP is described in more detail below.

Water Supply

The Tribe would develop an on-site water supply system using groundwater to meet potable water demands. Groundwater wells would be located in reasonable proximity to the proposed residential developments. The Tribe would install an onsite domestic water storage tank as well as the appropriate water distribution pipelines to the proposed Tribal residences. Water quality would be no less stringent than Federal water quality and Federal Safe Drinking Water Act standards. Inspections of the water supply system and water quality by the U.S. Environmental Protection Agency (USEPA) would ensure compliance with applicable safe drinking water standards. Tertiary treated wastewater would be utilized to meet the irrigation water demands of the vineyard operation, common area landscaping, and other irrigated uses as feasible. The existing agriculture storage reservoir would be used to meet the recycled water storage requirements. Water runoff will be retained and recharged at a minimum, in an amount to compensate for new impervious surfaces for roads, parking and building pads. Proposed water facilities are discussed in more detail in Chapter 2 of this Report.

Wastewater Treatment and Disposal

A new tertiary WWTP would be constructed on Parcel 1 (Figure 1-1) adjacent to the existing reservoir within the vineyards. The WWTP would be sized to accommodate the proposed wastewater generation rates of the Proposed Project. The tertiary treated wastewater would be recycled for use as agricultural irrigation for the existing agricultural operations, common area landscaping, and other irrigated uses as feasible on the project site. Drainage control would be installed along the perimeter of recycled water irrigation areas to prevent comingling with

stormwater runoff. Stormwater retention will also be designed to enhance capture and percolation/recharge of stormwater runoff to the underlying groundwater table. Recycled water runoff would be collected and disposed of via discharge to the WWTP.

The proposed WWTP and related facilities are discussed in more detail in Chapter 3 of this Report. In general terms, wastewater facilities would include a tertiary WWTP, sewer lift stations, conveyance systems, emergency storage, runoff/spill control, and a recycled water reservoir. The sewer lift stations would be developed within the residential areas as needed. The existing water reservoir located on Parcel 1 would be re-purposed to store recycled water from the WWTP, and enlarged if necessary. The reservoir would be equipped with provisions for potable water "make-up" water (with air-gap separation to protect the potable water supply) to supplement recycled water during high demand times. The existing water reservoir is currently lined and prior to use as a recycled water reservoir, the lining would be inspected for tears or other imperfections that may result in leakage. The proposed wastewater treatment system would be operated pursuant to U.S. Environmental Protection Agency (EPA) regulations.

LAND USE SUMMARY

143 - 5 ACRE LOTS

DEVELOPABLE LAND 1,302 ACRES

RESIDENTIAL PRD	793 ACRES
AGRICULTURAL	206 ACRES
OPEN SPACE/RECREATION - GENERAL/TRAILS	300 ACRES
SPECIAL PURPOSE ZONE - UTILITIES	3 ACRES

NON-DEVELOPABLE LAND 131 ACRES

RESOURCE MANAGEMENT ZONE - OAK WOODLAND	33 ACRES
RESOURCE MANAGEMENT ZONE - RIPARIAN CORRIDORS	98 ACRES

TOTAL SITE ACREAGE 1,433 ACRES

LEGEND

- **RESIDENTIAL ZONE** LOW DENSITY PLANNED RESIDENTIAL DEVELOPMENT
- **AGRICULTURAL ZONE** AGRICULTURAL 1
- **OPEN SPACE / RECREATION ZONE** PASSIVE TRAILS; EQUESTRIAN TRAILS
- **RESOURCE MANAGEMENT ZONE (RMZ)** OLD WOODLAND
- **RESOURCE MANAGEMENT ZONE (RMZ)** RIPARIAN CORRIDORS
- **SPECIAL PURPOSE ZONE** PUBLIC UTILITIES - WWTP
- **ROADS**
- **VIEW CORRIDOR**

NORTH

0 1000' 2000'

LEGEND

- **RESIDENTIAL ZONE** LOW DENSITY PLANNED RESIDENTIAL DEVELOPMENT
- **AGRICULTURAL ZONE** AGRICULTURAL 1
- **OPEN SPACE / RECREATION ZONE** PASSIVE TRAILS, EQUESTRIAN TRAILS
- **RESOURCE MANAGEMENT ZONE (RMZ)** OLD WOODLAND
- **RESOURCE MANAGEMENT ZONE (RMZ)** RIPARIAN CORRIDORS
- **SPECIAL PURPOSE ZONE** GOVERNMENT CENTER
- **SPECIAL PURPOSE ZONE** PUBLIC UTILITIES - WWTP
- **ROADS**
- **VIEW CORRIDOR**
- **CULTURAL RESOURCES**

LAND USE SUMMARY

143 - 5 ACRE LOTS

DEVELOPABLE LAND 1,302 ACRES

RESIDENTIAL PRD	793 ACRES
AGRICULTURAL	300 ACRES
OPEN SPACE/RECREATION - GENERAL/TRAILS	206 ACRES
SPECIAL PURPOSE ZONE - GOVERNMENT	60 ACRES
SPECIAL PURPOSE ZONE - UTILITIES	3 ACRES

NON-DEVELOPABLE LAND 131 ACRES

RESOURCE MANAGEMENT ZONE - OAK WOODLAND	33 ACRES
RESOURCE MANAGEMENT ZONE - RIPARIAN CORRIDORS	98 ACRES

TOTAL SITE ACREAGE 1,433 ACRES

NORTH

0 1000' 2000'

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CHUMASH CAMP 4 FEE-TO-TRUST

Figure 1-1
Fee-To-Trust Land Use Summary - Alternative A

SOURCE: SUMMIT PROJECT MANAGEMENT, 2011; AES 2011

ALTERNATIVE B – REDUCED DEVELOPMENT INTENSITY

Alternative B would involve placing the 1,433-acre Camp 4 site into federal trust status for the benefit of the Tribe; however, under Alternative B, the residential parcel lot sizes would be reduced from 5 acres to 1 acre, decreasing the residential acreage from approximately 793± acres to approximately 194± acres. Development on each one-acre plot would include approximately 0.25 acres of disturbance for building pad development, driveway construction, utility installations, and landscaping. Additionally, new domestic water connections, improved access roads, driveways, a new WWTP, and utilities would also be constructed to support the residences. A site plan identifying the proposed residential plots is shown in Figure 1-2. In addition, approximately 30 acres of the project site would be reserved for approximately 12,000 square feet of Tribal administrative facilities for administrative functions, limited meetings and small social functions. A breakdown of the components of the proposed Tribal facilities is displayed in Table 1-2. It is anticipated that the Tribal development would include office space for up to 40 Tribal employees and result in up to 100 events per year (maximum 300 to 400 guests) being held at the facilities. Approximately 250 parking spaces would be provided for the facilities.

Table 1-2. Tribal Community Development – Onsite Facilities

Usage	Square Footage (sf)
Tribal Office Complex	12,042
Circulation (Misc. at 30%)	3,613
Total Development	**15,655**

The remaining land uses and project components under Alternative B are identical to that proposed under Alternative A including: the construction of 143 residences ranging from 3,000 to 5,000 square feet, domestic water connections, and a WWTP. Public services, water supply, wastewater treatment and disposal, and roadway improvements would all be provided for Alternative B as described for Alternative A.

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CHUMASH CAMP 4 FEE-TO-TRUST

Figure 1-2
Fee-To-Trust Land Use Summary - Alternative B

SOURCE: SUMMIT PROJECT MANAGEMENT, 2011; AES 2011

Protective Measures and Best Management Practices

Protective measures and best management practices (BMPs) pertinent to this water and wastewater feasibility study have been incorporated into the project design to eliminate or substantially reduce environmental impacts from the Proposed Project.

These measures and BMPs are discussed below.

Land Resources

All structures would meet the Tribe's building ordinance, which meets or exceeds Uniform Building Code (UBC) requirements.

Water Resources

- High water-demand plants would be minimized in landscaping plans. Native and drought-tolerant plant species (trees, shrubs, and ground cover) would be emphasized.
- Turf grass/lawns will be eliminated during times of declared drought conditions in Santa Barbara County, as was recently proclaimed by the County on January 21, 2014. Residents will be allowed to re-plant lawns when drought conditions are lifted.
- Water-efficient fixtures and appliances would be installed in residences.
- Stormwater runoff will be retained on site and allowed to percolate/recharge the underlying groundwater to the extent practical, striving to compensate at a minimum, for the new impervious surfaces proposed for roads, parking areas and building pads. A minimum of 14 AF of runoff will be retained on site and percolated to the underlying groundwater.

Public Services

- Structural fire protection would be provided through compliance with Tribal ordinances no less stringent than applicable Uniform Fire Code requirements. The Tribe would ensure that appropriate water supply and pressure is available for emergency fire flows.

CHAPTER 2

WATER SYSTEM

This chapter describes the projected water demands, water supply and distribution system requirements for the Chumash Camp 4 Project (Project) for Alternatives A and B. The water demand forecasts form the basis for assessing water supply requirements and identifying distribution system requirements. Recycled water demands are discussed in detail in Chapter 3.

PROJECTED POTABLE WATER DEMAND

Potable water demands projected for the Project will form the basis for recommendations for needed water supply, and for laying out conceptual water system components including potable water distribution and fire suppression system, water storage and pumping requirements. Detailed hydraulic analyses of the conceptual water system are beyond the scope of this study; however, general water system infrastructure is described in this Chapter. Water demands for Alternatives A and B are based on the program descriptions presented in Chapter 1 of this Report.

Key factors, assumptions and details used to formulate water demands for both Alternatives A and B include the following:

- Residential Units, 3.5 persons per dwelling unit, or ~500 permanent population
- Domestic indoor water demand, 65 gallons per capita per day (gpcd)
- All homes furnished with low-flow fixtures

Hydraulic Demand Parameters

Water system demands are important characteristics of water systems, as these parameters are used to size pumping, storage, and distribution system facilities. Demands calculated for this Project will be used to evaluate water distribution system requirements. Since this is a planned future Project, existing operations data is not available to be used as part of the water demand analysis. Therefore, trends from other communities will be used to estimate demand factors herein.

Hydraulic demand parameters are defined as follows:

- Average Day Demand (ADD). The ADD is the average water demand calculated over the year. This demand is generally determined by production records, however, since the Project is a new development, the ADD must be estimated based on industry standards.
- Night Time Demand (NTD). The NTD is the production of water during low flow periods, typically seen in the middle of the night. These flows are critical for properly sizing pumps to meet these low demands. The NTD peaking factor for communities can vary considerably.
- Maximum Day Demand (MDD). The MDD is the maximum daily production of water needed to meet the peak day demand of the year. This is generally during the

summer as a result of increased residential irrigation demand. The MDD peaking factor for communities of similar size can range from 1.6 to 2.0. To be conservative, for this analysis, a peaking factor of 2.0 (2.0 times the ADD) will be used.

- Peak Hour Demand (PHD). The PHD of the system is critical in sizing water mains and pumping facilities. During peak hour demand, customers will generally experience low service pressures in areas with undersized mains and/or lack of looped distribution pipelines. The PHD is generally determined by calculating the specific demand within the day, by monitoring tank levels and pumping records. A PHD factor of 3.5 (3.5 times the ADD) was assigned to the entire system, based on engineering judgment and data from other similar municipalities. It is also noted, however, that the fire flow will be the highest water demand in the system.

It is noted that irrigation of the existing vineyards, open space/recreational land use designations, and Tribal Office Complex irrigation demands (Alternative B), will be met using recycled water from the wastewater treatment plant, and make-up groundwater from on-site irrigation wells. Refer to Chapter 3 for more information on recycled water uses and demands. It is further noted that frost protection for the vineyards will be accomplished with windmills/fans, not high rate irrigation sprinklers.

Landscape irrigation demands were developed in part, by referring to local weather data available on the California Irrigation Management Information System (CIMIS) web site for local Santa Ynez weather stations, and consideration of the type of landscaping to be irrigated. For all residential lots, turf area was estimated, in part by comparing sample properties surrounding the Project area to determine landscaped areas, turf/lawn areas, and buffer areas with no landscaping.

Potable Water Demand – Alternative A

Potable water demands for Alternative A are summarized in Table 2-1. Key factors, assumptions and details used to formulate water demands for Alternative A include the following:

- Total disturbance area, 0.65 acres.
- 5-acre Lot size, 0.5 acres of low water demand landscaping per lot, water demand 1.0 acre feet per year (AFY)/acre.
- Assumes 0.15 acres of irrigated turf/lawn area per lot, allowed only during years that Santa Barbara County drought declaration is lifted.
- Lawn/Turf irrigation demand, 3.0 AFY/acre (Zero demand during declared drought years).

Potable Water Demand – Alternative B

Potable water demands for Alternative A are summarized in Table 2-2. Specific water demands for the Tribal Government Center are summarized in Table 2-3. Key factors, assumptions and details used to formulate water demands for Alternative A include the following:

- 1-acre Lot size, 0.1 acres of low water demand landscaping per lot, 1.0 AFY/acre
- Pad disturbance, 0.25 acres

- Assumes 0.075 acres of irrigated turf/lawn area per lot, 3.0 AFY/acre irrigation demand, allowed only during years that Santa Barbara County drought declaration is lifted.

Table 2-1. Summary of Potable Water Demands – Alternative A

User	Unit	Type of Unit	Peak Hour Demand per Unit, gpm[b]	Annual Demand, AFY	
				Non-Drought	Drought
Residential - indoor	143	SFR[a]	0.22	36.4	36.4
Residential - landscape drought tolerant LS	0.5	acres	0.93	71.5	71.5
Residential - Lawn	0.15	acres	0.84	64.4	0
TOTAL	**---**	**---**	**284**	**326.8**	**262.4**

[a]*Single-family residence*

[b]*Gallons per minute*

Table 2-2. Summary of Potable Water Demands – Alternative B

User	Unit	Type of Unit	Peak Hour Demand per Unit, gpm	Annual Demand, AFY	
				Non-Drought	Drought
Residential - indoor	143	SFR	0.22	36.4	36.4
Residential - landscape drought tolerant LS	0.1	acres	0.19	14.3	14.3
Residential - Lawn	0.075	acres	0.42	32.2	0
TOTAL	**---**	**---**	**217**	**82.9**	**50.7**

Table 2-3. Summary of Potable Water Demands – Tribal Office Complex

Building Use	Unit	Quantity	Demand	Unit	Demand, gpm	Demand, AFY[1]
Tribal Office	Event	100/yr	10	gpd/person@400 persons/event	27.8	1.2
	Employee	40 ea	20	gpd/employee	7.1	0.90
			Included in employees above			
			Included in events above			
TOTAL					**34.9**	**2.1**

[1] *Tribal Office Complex irrigation demands met using recycled water and non-potable irrigation water.*

WATER SUPPLY

This section discusses the existing site hydrogeology, existing water wells and expected water quality, the existing storage reservoir, and water supply needs.

Net Potable Water Demand – Alternative A

Net potable water demands for Alternative A are summarized in Table 2-4. The net project demand considers new potable water demands only, therefore does not include the existing water demand for the vineyard (which will be irrigated with recycled water and irrigation water from on-site irrigation wells). Key factors, assumptions and details used to formulate potable water demands for Alternative A were discussed earlier in this Chapter 2.

Table 2-4. Net Potable Water Demand for Alternative A (5-Acre Parcels)

User	Unit	Type of Unit	Annual Demand (AFY)
Residential - indoor use	143	SFR	36
Residential - landscape irrigation (drought tolerant)	0.5	acres	72
Residential – lawn irrigation	0.15	acres	0[1] - 64
Treated wastewater for irrigation (90% of indoor use)	--	--	<30>
Vineyard Credit/Reduction (less 50 acres irrigation)			<50>
NET PROJECT POTABLE WATER DEMAND[2]	--	--	28[1] - 92

SFR – single family residence

[1]No turf irrigation demand during years of Santa Barbara County drought declaration.

[2]Note, there will be no net GW recharge loss due to percolative losses from impervious surfaces. A calculated 14 AFY runoff (same for Alternatives A and B) will be captured, retained on site and percolated to the underlying groundwater table below the Project site.

Net Potable Water Demand – Alternative B

Net potable water demands for Alternative B are summarized in Table 2-5. As in Alternative A, the net potable water project demand considers new water demands only, therefore does not include the existing water demand for the vineyard (to be irrigated with recycled water and irrigation water from on-site irrigation wells). Specific potable water demands for the Tribal Office Complex are summarized in Table 2-3. Key factors, assumptions and details used to formulate water demands for Alternative B were presented earlier in Chapter 2. As can be seen from Table 2-5, during low water years/drought conditions, the proposed Alternative B Project is essentially water-neutral (net potable water demand of zero.

Table 2-5. Net Potable Water Demand for Alternative B (1-Acre Parcels)

User	Unit	Type of Unit	Annual Demand (AFY)
Residential – indoor use	143	SFR	36
Residential – landscape irrigation (drought tolerant)	0.4	acres	14
Residential – lawn irrigation	0.1	acres	0[1] – 32
Tribal Office Complex (indoor)	--	--	2
Vineyard Credit/Reduction (less 50 acres irrigation)			<50>
Treated wastewater for irrigation (90% of indoor use)	--	--	<35>
NET PROJECT DEMAND[2]	--	--	0[1] - 21

SFR – single family residence

[1]No turf irrigation demand during years of Santa Barbara County drought declaration.

2Note, there will be no net GW recharge loss due to percolative losses from impervious surfaces. A calculated 14 AFY runoff (same for Alternatives A and B) will be captured, retained on site and percolated to the underlying groundwater table below the Project site.

Site Hydrogeology

Existing water supply at the site is entirely from groundwater resources within the Santa Ynez Uplands Groundwater Basin. The basin comprises the eastern portion of the groundwater basins of the Santa Ynez River watershed. These basins lie between the San Rafael Mountains to the north and east, the Purisima Hills to the northwest and the Santa Ynez Mountains to the south. The Santa Ynez Upland Groundwater Basin is located north of the Santa Ynez River between Buellton and the east end of Lake Cachuma. It underlies 130 square miles and is widest in the west and narrows to the east.

The shape of the basin is controlled by east-west trending folding and faulting of sedimentary beds and has also been influenced by historical stages and flow of the Santa Ynez River. It is bounded by a topographical groundwater divide from the San Antonio Basin to the northwest,

faults and impermeable rocks of the San Rafael Mountains to the north and east, and by nonwater-bearing Tertiary age formations to the south that separate it from the Santa Ynez River alluvial basin. Average rainfall within the basin varies from a maximum of about 24 inches per year in the higher elevations to a minimum of about 15 inches per year in the southern and central areas. Rainfall and stream seepage are the primary sources of recharge to the basin.

(DWR, 1980, SB County Groundwater Report, 2008).

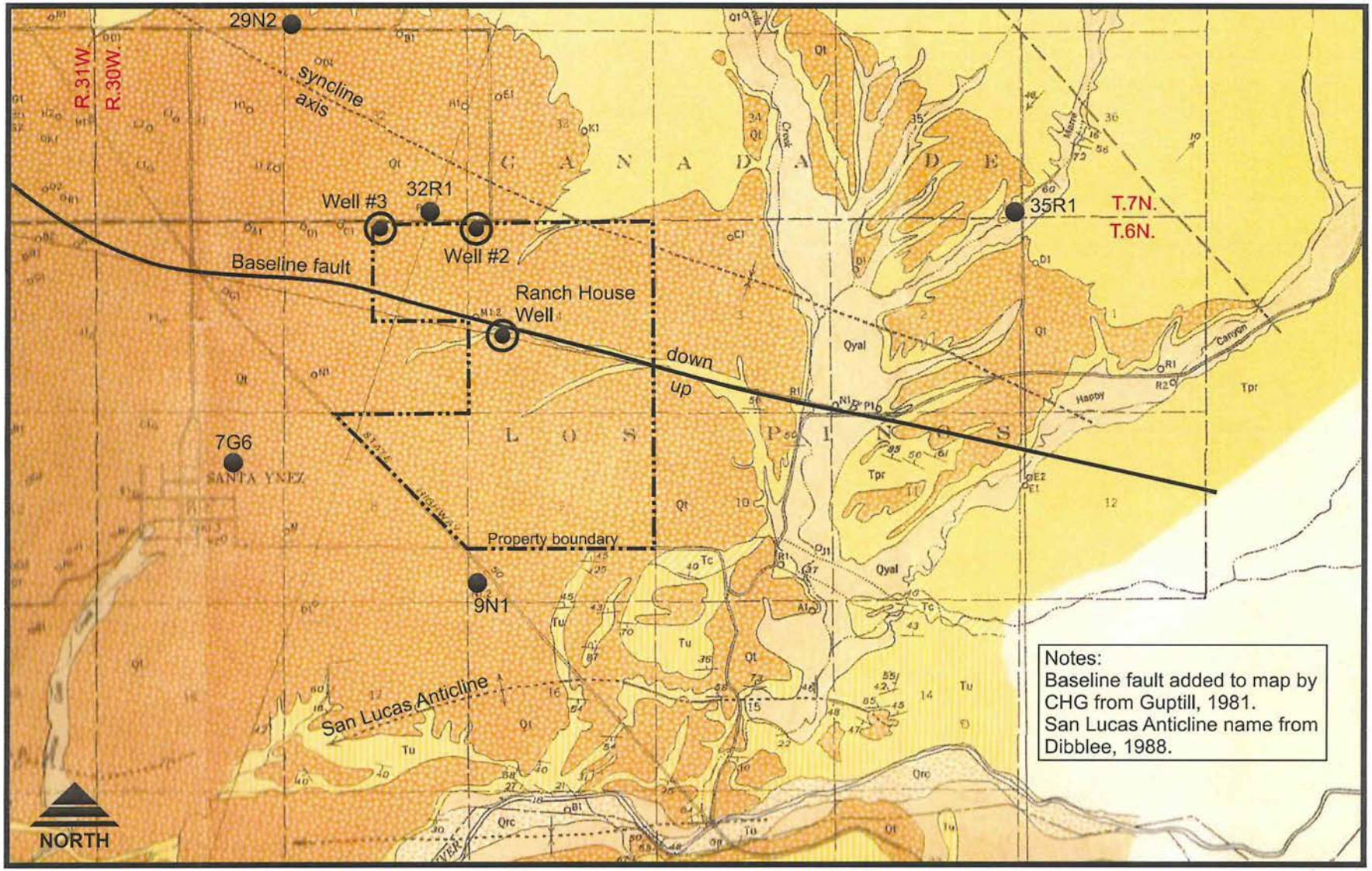
Loosely consolidated sand and gravel aquifers of the Plio-Pleistocene age Paso Robles Formation are the major source of groundwater in the basin. The formation consists of deposits of sand and gravel interbedded with clay and silt in discontinuous, lenticular beds. The Pliocene-age Careaga Formation lies underneath the Paso Robles Formation as unconsolidated fine to medium grained marine sand and lesser silt. Although it is water bearing within the basin, it is generally tapped by wells only in the southern margins of the basin where it has been uplifted to relatively shallow depths.

The Paso Robles and Careaga Formations have been folded into a north-dipping monocline north of the axis of the San Lucas Anticline which brings consolidated nonwater-bearing rocks of the Sisquoc and Monterey Formations to or near the ground surface south of the Chumash Camp 4 Project southern boundary. The water bearing zones of the Paso Robles Formation become increasingly thick and both the Paso Robles and the Careaga Formations become increasingly deep from south to north across the project area to the roughly east-west trending Baseline fault that crosses the northern half of the project property. The Baseline fault is a reverse fault, vertically offsetting fluvial terraces in the project area (Guptill, 1981), and effectively lowering the underlying Paso Robles and Careaga Formations north of the fault. The beds continue to dip to the north to the axis of a syncline crossing the northeast corner of the project area. North of the syncline, the beds become shallower.

Supply wells drilled between the Baseline fault and the syncline axis would encounter the greatest thickness of the Paso Robles Formation within and in the vicinity of the project boundaries. The fault may restrict groundwater flow across the fault plane, resulting in non-correlative groundwater levels in wells on opposite sides of the fault. A regional geologic map from the U.S. Geological Survey (1951) is included as Figure 2-1, showing the two fold axes with the Baseline fault added by CHG. The geologic maps by Dibblee (1988, 1993) were not used because of conflicting information on the two adjacent quadrangles.

Existing Water Well Production

Current water supply at the site is provided by two irrigation wells, serving irrigation requirements for the 256 acre vineyard, and by one ranch/domestic well that provides water for the ranch house and for stock watering. Well locations are shown on Figure 2-1. The two irrigation wells are located along Baseline Avenue situated within the down-dropped geologic structure between the Baseline fault and the synclinal axis north of the property, and the ranch/ domestic well is located near the trace of the fault.



Base map: Geologic Map & Sections of the Central Part of the Santa Ynez River Basin U.S.G.S. Water-Supply Paper 1107 Plate 2, Upson & Thomasson, 1951

0 4,000 8,000

Scale: 1 inch = 4,000 feet

Explanation

Qt	Terrace deposits
Tpr	Paso Robles Formation
Tc	Careaga Formation
Tu	Consolidated Tertiary rocks
◎	Existing onsite project well
●	Existing offsite well with water level data

Figure 2-1
Regional Geology Map
Chumash Camp 4
Cleath-Harris Geologists

The irrigation well #3 in the northwest corner of the property, was completed in 1984 to a total depth of 795 feet with perforations from 248 to 785 feet depth. The well was completed with 16-inch steel casing. According to the ranch manager, the well produces between 900 and 1,200 gallons per minute (gpm). During a four-hour pump test in November 1984, the static water level was 137 feet depth. Four pumping steps were performed beginning at 1,200 gpm and ending at 2,700 gpm with a final pumping level of 230 feet depth. A 60-minute pumping test was performed in August 1999 at rates of 1,960, 1,830 and 1,680 gpm with a maximum pumping level of 185 feet depth. The testing contractor recommended operational flow rates between 1,100 and 1,400 gpm for best operating efficiencies. An attempt was made in February 2014 to test this well, but this could not be accomplished as there was no way to measure depth to water in this well.
The irrigation well #2 is approximately one half mile east of well #3, and was completed in 1999 to a total depth of 740 feet. Perforation depth intervals are from 290 to 520 feet, 550 to 620 feet, and 660 to 730 feet. Casing is 16-inch diameter steel. According to the ranch manager, the well produces 1,700 gpm. During an eight-hour pumping test in December 1999, the static water level was measured at 178 feet depth. Pumping was performed in three steps at 1,500, 2,000 and 2,500 gpm with a maximum pumping level of 233 feet depth. The well is equipped with a 250 horse-power pump motor.

Both irrigation wells are equipped with an air line for measuring water levels and a flow meter. Water is pumped from the wells to a ½-acre lined reservoir for vineyard irrigation, that holds approximately 2-1/2 acre-feet.

A recent pumping test was conducted on Well #2 on February 13, 2014. Based on airline measurements, the static water level was calculated to be 164 feet depth. The exact length of the airline is not known, but by back calculating from historic water levels it is about 175 feet deep, three feet shallower than in December 1999. Flow measurements for Well #2 were calculated by measuring the change in volume of the water reservoir during the pumping test. Based on careful measurements, the discharge was calculated to be 1,900 gallons per minute. After the four-hour pumping test, water levels reached a maximum drawdown of 65 feet which produced a specific capacity of 29 gpm/ft.

The Ranch House Well (RHW) was completed with eight-inch diameter steel casing and serves the cattle ranching area and the ranch house. The total depth of the well is 505 feet. A new, three horse-power pump was installed in 2005, and is capable of pumping 25 gpm. Static water level in July 2005 was 105 feet depth.

A four-hour pumping test was conducted on the RHW on January 21, 2014. The static water level was 128.8 feet depth (about 24 feet deeper than in 2005) and the flow rate for the test was 26 gallons per minute. The pumping water level stabilized at around 132 feet depth after 10 minutes of pumping (3.2 feet of drawdown) and a specific capacity of 8.1 gpm/ft.

There is an eight-inch diameter steel-cased well with a windmill rod and column in the north-central portion of parcel 4. The well was dry to a total depth of 74 feet during a site visit by CHG in March 2012.

During the March 2012 CHG site visit, an active irrigation well was observed off the property on the adjacent parcel approximately three tenths of a mile west of the ranch house. The well is equipped with a submersible pump.

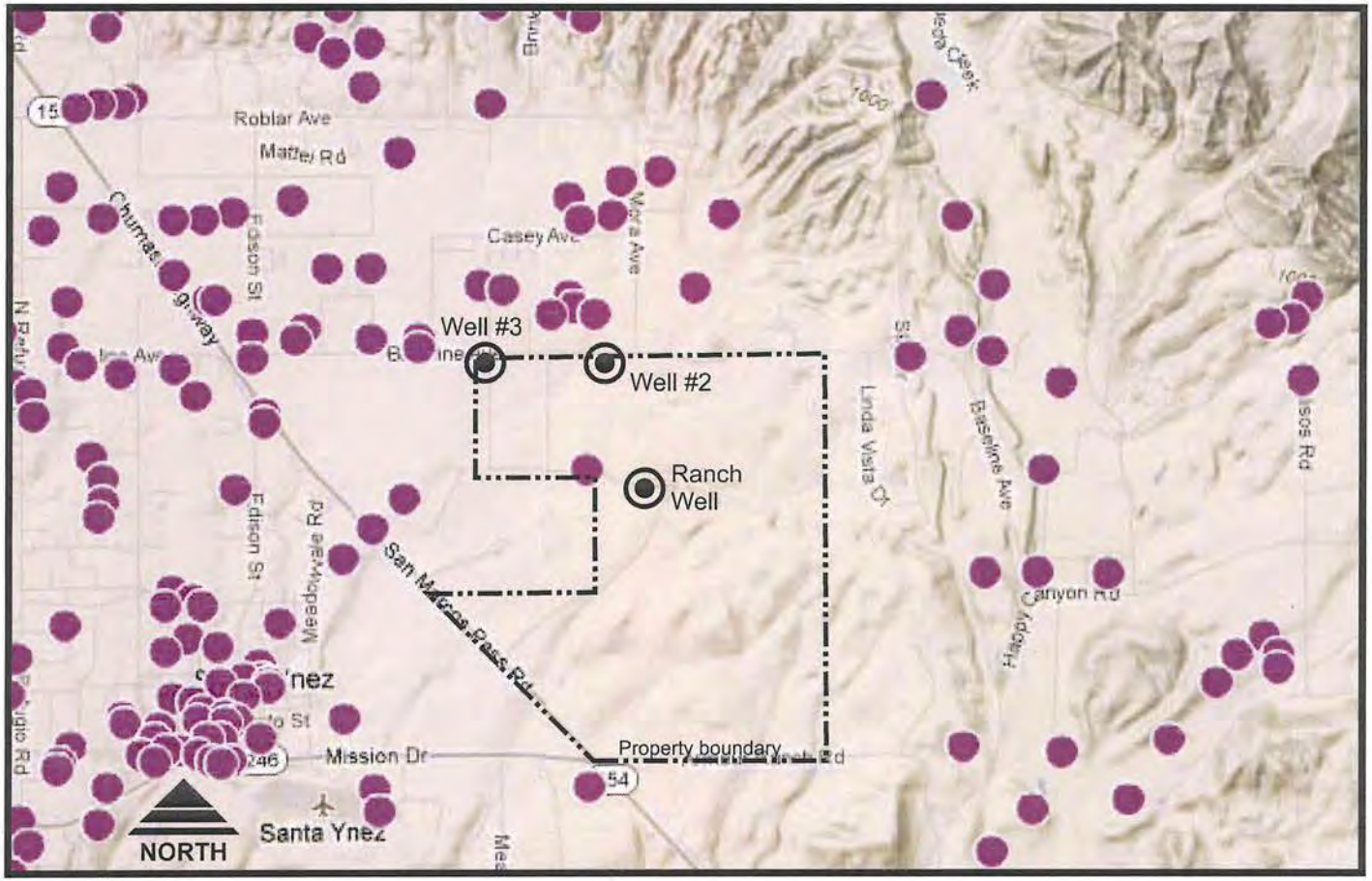
Several wells are present along the north side of Baseline Avenue that serve domestic supply and small irrigation demands including stock watering. Two wells serve the Santa Ynez Rancho Estates Mutual Water Company east of the project site. According to the ranch manager, an irrigation well also to the east of the project property serves a 50-acre vineyard. There are presumed to be several domestic wells serving the tract northeast of the project property. No wells were observed south of Armour Ranch Road during the March 2012 site visit by CHG. Offsite wells for which water level data are available through the California Department of Water Resources (DWR) internet site are shown in Figure 2-2.

The irrigation demand for the existing vineyard located in the northern portion of the site is met by groundwater supply from the two Baseline Avenue wells by way of the ½-acre reservoir. Based on typical water use in Santa Ynez Valley vineyards, duty factors vary from 0.8 to 1.2 acre-feet per acre per year. For this assessment, one acre-foot per acre per year is estimated for the onsite vineyard water demand. Under the existing conditions at the site, the annual water demand for the 256 acre vineyard is estimated at 256 acre-feet per year (AFY).

Existing Water Well Quality

Water quality samples were obtained at the Baseline Avenue Well #2 on December 22, 1999 following the well completion and pump testing. This well was recently sampled February 13, 2014. The samples from Well #2 were analyzed for general minerals, general physical, and inorganic chemicals. No analytes were present in concentrations above the State of California maximum contaminant levels for drinking water. The total dissolved solids concentration was 480 milligrams per liter (mg/l) and total hardness concentration was 386 mg/l (1999); total dissolved solids concentration was 440 milligrams per liter (mg/l) and total hardness suitable for irrigation water. Water quality testing to meet US EPA maximum contaminant levels established under the Safe Drinking Water Act is required from water supply wells prior to providing the domestic supply for the proposed project. Table 2-6A provides a summary of the analytical results from 1999, and Table 2-6B presents the recent February 2014 analytical data (analyzed by FGL Environmental)..

A water sample taken from the Ranch House Well during the pumping test was analyzed by FGL Environmental for water quality. The results of this analysis are presented in Table 2-7. None of the constituents analyzed exceeded the maximum contaminant level for drinking water.



Base map: California DWR Water data library online map.

0 4,000 8,000

Scale: 1 inch = 4,000 feet

Explanation

- Well locations with water level data available through California Dept. of Water Resources

Figure 2-2
Water-Level Location Map
Chumash Camp 4
Cleath-Harris Geologists

Project Potable Water Supply Needs – Alternative A

Potable water demand calculations were prepared for this Alternative, and include residential demands for 143 five-acre lots including residential landscaping. It is estimated that 40 to 104 AFY of net water demand is needed to serve the new project under Alternative A, the lower value being realized during drought years when turf grasses will not be irrigated. The existing vineyard and open space/recreation demands will be served by blending groundwater from existing on-site irrigation wells and tertiary treated recycled water from the wastewater treatment facility. Peak hour demand for the potable water system is calculated as 284 gpm. Two new wells, rated at 500 gpm each, will be adequate to supply the Project potable water, and for potable water supply redundancy.

Project Potable Water Supply Needs – Alternative B

Potable water demand calculations were prepared for this Alternative, and include residential demands for 143 one-acre lots including residential landscaping, and the Tribal Government Center. It is estimated that 1 to 33 AFY of water demand is needed to serve the new project under Alternative B. Although the Tribal Government Center increases water demand compared to Alternative A, this Alternative B also reduces residential irrigation demand considerably with the smaller lot size. As with Alternative A, the vineyard and open space/recreation demands, and Tribal Government Center landscape irrigation, will be served by groundwater supply wells and by tertiary treated recycled water from the wastewater treatment facility. Peak hour demand for the potable water system is calculated as 252 gpm (including Tribal Office Complex). The estimated peak hour demand is slightly lower than Alternative A, due to reduced residential irrigation demand. Two new wells, rated at 500 gpm each, should be provided to supply the Project potable water, and for potable water supply redundancy.

Table 2-6A. Water Quality Results – Baseline Well #2 (December 1999)

Analyte	Units	Results	MCL
Total Hardness (as $CaCO_3$)	mg/L	386	--
Calcium	mg/L	31	--
Magnesium	mg/L	75	--
Potassium	mg/L	2	--
Sodium	mg/L	26	--
Bicarbonate	mg/L	440	--
Sulfate	mg/L	22	250
Chloride	mg/L	35	250
Nitrate (NO_3)	mg/L	5.8	45
Fluoride	mg/L	0.2	2
pH	pH units	7.8	--
Electrical Conductivity	umhos/cm	827	1600
Total Dissolved Solids	mg/L	480	1000
Color	units	ND	15
Odor	TON	ND	3
Turbidity	NTU	ND	5
MBAS	mg/L	ND	0.5
Aluminum	ug/L	ND	1000
Antimony	ug/L	ND	6
Arsenic	ug/L	2	10
Barium	ug/L	269	1000
Beryllium	ug/L	ND	4
Cadmium	ug/L	ND	5
Chromium	ug/L	27	50
Copper	ug/L	ND	1000
Iron	ug/L	ND	300
Lead	ug/L	ND	15
Manganese	ug/L	ND	50
Mercury	ug/L	ND	2
Nickel	ug/L	ND	100
Selenium	ug/L	ND	50
Silver	ug/L	ND	100
Thallium	ug/L	ND	2
Zinc	ug/L	ND	5000

mg/L = milligrams per liter
ug/L = micrograms per liter
umhos/cm = micromhos per centimeter
TON = Threshold Odor Number
NTU = Nephelometric Turbidity Units
MCL = Maximum Contaminant Level
ND = Not detected above laboratory detection limit
NOTE: Samples obtained December 22, 1999

Table 2-6B. Water Quality Results – Baseline Well #2 (February 2014)

Analyte	Units	Results	MCL
Total Hardness (as $CaCO_3$)	mg/L	426	--
Calcium	mg/L	34	--
Magnesium	mg/L	83	--
Potassium	mg/L	2	--
Sodium	mg/L	28	--
Bicarbonate	mg/L	440	--
Sulfate	mg/L	24	250
Chloride	mg/L	39	250
Nitrate (NO_3)	mg/L	9.6	45
Fluoride	mg/L	0.1	2
pH	pH units	8.0	--
Electrical Conductivity	umhos/cm	820	1600
Total Dissolved Solids	mg/L	440	1000
Color	units	ND	15
Odor	TON	ND	3
Turbidity	NTU	0.3	5
MBAS	mg/L	Negative	0.5
Aluminum	ug/L	ND	1000
Antimony	ug/L	ND	6
Arsenic	ug/L	2	10
Barium	ug/L	290	1000
Beryllium	ug/L	ND	4
Cadmium	ug/L	ND	5
Chromium	ug/L	32	50
Copper	ug/L	ND	1000
Iron	ug/L	100	300
Lead	ug/L	ND	15
Manganese	ug/L	ND	50
Mercury	ug/L	ND	2
Nickel	ug/L	ND	100
Selenium	ug/L	2	50
Silver	ug/L	ND	100
Thallium	ug/L	ND	2
Zinc	ug/L	ND	5000

mg/L = milligrams per liter
ug/L = micrograms per liter
umhos/cm = micromhos per centimeter
TON = Threshold Odor Number
NTU = Nephelometric Turbidity Units
MCL = Maximum Contaminant Level
ND = Not detected above laboratory detection limit

Table 2-7. Water Quality Results – Ranch House Well (January 2014)

Analyte	Units	Results	MCL
Total Hardness (as $CaCO_3$)	mg/L	383	--
Calcium	mg/L	33	--
Magnesium	mg/L	73	--
Potassium	mg/L	2	--
Sodium	mg/L	31	--
Bicarbonate	mg/L	420	--
Sulfate	mg/L	28	250
Chloride	mg/L	42	250
Nitrate (NO_3)	mg/L	12.2	45
Fluoride	mg/L	ND	2
pH	pH units	7.9	--
Electrical Conductivity	umhos/cm	845	1600
Total Dissolved Solids	mg/L	420	1000
Color	units	ND	15
Odor	TON	ND	3
Turbidity	NTU	ND	5
MBAS	mg/L	negative	0.5
Aluminum	ug/L	ND	1000
Antimony	ug/L	ND	6
Arsenic	ug/L	3	10
Barium	ug/L	390	1000
Beryllium	ug/L	ND	4
Cadmium	ug/L	ND	5
Chromium	ug/L	32	50
Copper	ug/L	ND	1000
Iron	ug/L	ND	300
Lead	ug/L	ND	15
Manganese	ug/L	ND	50
Mercury	ug/L	ND	2
Nickel	ug/L	ND	100
Selenium	ug/L	3	50
Silver	ug/L	ND	100
Thallium	ug/L	ND	2
Zinc	ug/L	ND	5000

mg/L = milligrams per liter
ug/L = micrograms per liter
umhos/cm = micromhos per centimeter
TON = Threshold Odor Number
NTU = Nephelometric Turbidity Units
MCL = Maximum Contaminant Level
ND = Not detected above laboratory detection limit

PROPOSED POTABLE WATER SUPPLY SYSTEM

The two existing wells on site have provided irrigation water supply for the vineyard and are considered reliable for future irrigation use based on their well design, their location within the deepest part of the Santa Ynez Uplands groundwater basin, and the observed trend in rising water levels in the area. The basin is likely in a state of surplus, following changes in pumping patterns and the importation of State Water in the 1980s and 1990s, which altered the amount of water extracted from the basin (SBCWA, 2011 page 52; Santa Barbara County Office of Long Range Planning, October 2009 page 128; Santa Barbara County Office of Long Range Planning, September 2007 Table 3.6-1). These changes in water use and the rising water level trends in the project area suggest that existing production rates of the two project irrigation wells can be relied upon to meet future irrigation demands.

To meet the proposed project potable water demands, however, two new potable water supply wells would be required to provide a groundwater supply redundancy, and also provide for flexibility in pumping schedules. While new wells located in the northeastern portion of the project area would likely provide the best onsite production, the nearby offsite wells northeast of the project area could experience significant water-level impacts from new project wells in that location (Figures 2-1 and 2-2). A new well located north of the Baseline fault but away from the northeast corner of the property could be expected to provide a reliable and adequate water supply and be less likely to cause significant offsite impacts than new wells located near the northeasterly project boundary. A new well placed south of, but near the Baseline fault would likely produce a reliable and adequate water supply for the project, and could be expected to cause minimal or no offsite water-level impacts. There are fewer offsite wells east of the southern project area than northeast of the site, and a well south of the fault could be located several thousand feet from the nearest offsite wells. Impacts across the fault from a new well would be minimized because of the expected restrictions to groundwater flow along the fault plane. Also, a well drilled south of the fault could tap permeable sands of the relatively unexploited Careaga Formation as it becomes shallower to the south away from the fault.

WASTEWATER

Wastewater treatment for both project Alternatives A and B is proposed to include onsite tertiary treatment for recycling and reuse in vineyard and landscape irrigation. The wastewater flow is assumed in this study to be equivalent to 90 percent of residential and Tribal Office Complex indoor water use. The treated effluent will be pumped to the irrigation reservoir where it could be blended with groundwater produced from onsite wells and be available for vineyard and landscape irrigation. Because of probable increased storage requirements to accommodate effluent volumes, an additional treated effluent storage reservoir may be necessary (refer to Chapter 3 for further discussion).

The project may require up to two sites to be used for treated effluent storage ponds. The pond locations and design will be dependent on the treatment plant site selection and on site conditions. The options for percolation pond designs that could be used for wastewater disposal are very limited at the site because of the character of underlying soils. However, based on the water balance presented in Chapter 3, it is not anticipated that percolation disposal will be required. The Santa Ynez area has been identified as an area where existing septic system use is causing problems (Questa, 2003). According to the Septic System

Sanitary Survey for Santa Barbara County report (Questa, 2003), one of the sources of the wastewater related problems was the "highly restrictive soil-site conditions for a large portion of the area…" Because of the soil conditions, many disposal systems in the vicinity of the project area are based on drywell designs (Santa Barbara County, Office of Long Range Planning, September 2009).

The soil types found at the site are shown on Figure 2-3 and are based on soil surveys by the Natural Resources Conservation Service. The capacity of the soils to transmit water is considered very low to moderately low in soils underlying 73 percent of the project site and moderately low to moderately high in soils underlying 21 percent of the site. The Botella loam (BoA) has the highest saturated hydraulic conductivity, but it is located within the vineyard in the northern portion of the site. The Chamise shaly loam (ChF) extends across a large area and may provide minimal percolation rates; however, it is a thin soil underlain by less permeable material and underlies moderately steep slopes. Based on the soil types and conductivities listed in the soil survey, percolation rates underlying the site are generally inferred to be very slow. Soil characteristics for each soil type are summarized in Table 2-8 below:

Table 2-8. Soil Properties on Project Site

Soil Type	Percent of Property	Percent Slopes	Depth to restrictive feature (inches)	Drainage Class	Capacity of the most limiting layer to transmit water
BoA	5.4	0-2	80	well drained	mod high (0.2 to 0.57 in/hr)
CeC	0	5-9	34-46	well drained	mod low to mod high (0.06 to 0.20 in/hr)
ChF	21.2	15-45	22-40	well drained	mod low to mod high (0.06 to 0.20 in/hr)
ChG2	0.1	30-75	10-20	well drained	mod low to mod high (0.06 to 0.20 in/hr)
PtC	30.7	2-9	20-26	well drained	very low to mod low (0.00 to 0.06 in/hr)
PtD	13.3	9-15	12-20	well drained	very low to mod low (0.00 to 0.06 in/hr)
PtE	15.7	15-30	6-26	well drained	very low to mod low (0.00 to 0.06 in/hr)
SnC	7.9	2-9	20-30	mod well drained	very low to mod low (0.00 to 0.06 in/hr)
SnD	5.7	9-15	20-29	mod well drained	very low to mod low (0.00 to 0.06 in/hr)

Base map: U.S. Department of Agriculture, NRCS, Custom Soil Resource Report for Northern Santa Barbara Area, California

0 2,000 4,000

Scale: 1 inch = 2,000 feet

Explanation

BoA	Botella loam, 0-2% slopes
CeC	Chamise sandy loam, 5-9% slopes
ChF	Chamise shaly loam, 15-45% slopes
ChG2	Chamise shaly loam, 30-75% slopes, eroded
PtC	Positas fine sandy loam, 2-9% slopes
PtD	Positas fine sandy loam, 9-15% slopes
PtE	Positas fine sandy loam, 15-30% slopes
SnC	Santa Ynez gravelly fine sandy loam, 2-9% slopes
SnD	Santa Ynez gravelly fine sandy loam, 9-15% slopes

Figure 2-3
Soil Survey Map
Chumash Camp 4
Cleath-Harris Geologists

IMPACTS

The Santa Barbara County Groundwater Report for 2011 states that the Santa Ynez Uplands Groundwater Basin was historically in overdraft by about 2,000 AFY based on 1992 estimates. However, a study commissioned in 2002 by the SBCWA determined that subsequent changes in basin demand and increases in imported water resulted in a basin that was balanced or in a state of slight surplus. The SBCWA 2011 report (page 53) also states that groundwater pumpage by the City of Solvang is interpreted to be from a perched aquifer that is not within the Santa Ynez Uplands basin, which had been included in prior basin pumpage estimates. Available storage within the basin is estimated to be about 900,000 AF (La Freniere and French, 1968). Safe yield of this basin is estimated to be 11,500 AFY (for gross pumpage) and estimated pumpage of the basin is 11,000 AFY (Ahlroth, 2001). The basin is considered in a state of surplus by the Santa Barbara County Office of Long Range Planning (September 2007, Table 3.6-1).

Implementation of the proposed project results in a net increase in water production of 92 AFY for Alternative A, and 21 AFY for Alternative B. Groundwater levels in U.S. Geological Survey monitored wells to the north, east and west of the site have risen since the mid 1990s. Because of the increased importation of water that offsets pumping in the basin, these stabilizing water levels support a surplus condition in the project area.

Hydrographs for the U.S. Geological Survey monitored wells are shown in Figures 2-4 and 2-5. A map showing locations for other offsite wells for which water level data are available with the DWR is shown on Figure 2-2. Increased well production above existing conditions at the site may adversely impact neighboring wells depending on where the onsite wells are located and the amount of pumping that occurs. The recommendations in the following paragraph are provided to reduce/prevent these potential impacts.

RECOMMENDATIONS TO REDUCE IMPACTS

Potential impacts to offsite wells may be reduced through various options that would reduce groundwater production and/or use imported water to meet demand. Water conservation methods may be appropriate for residential indoor use, Tribal Government Center use, residential landscape use and in the existing vineyard irrigation. There are many resources and water conservation programs/techniques available. For example, the County of Santa Barbara Public Works Department has information on water conservation measures on their website (http://www.sbwater.org/), some of which have been incorporated into this report. These conservation measures are consistent with best management practices to reduce water demands. In addition to use of low flow fixtures and drought tolerant landscaping (see Chapter 1), the following recommendations can be considered:

- Drip irrigation, drought-tolerant planting, and dry-farming techniques are recommended where appropriate.
- A reduction in the amount of space set aside for residential landscape areas should be (and already has been) considered.
- Residential lawns have the highest water demand of the various land uses. Reduction of lawn size below the 0.15 acres per residence for Alternative A and the 0.075 acres for Alternative B would significantly reduce this demand.

- During years when Santa Barbara County declares local drought conditions, there will be no turf grass allowed, reducing residential lawn demand to zero.
- Irrigation controllers/timers should be used to control duration and timing of irrigation to minimize losses.
- Stormwater runoff capture for recharge, where possible.

Siting proposed water wells as far as possible from existing offsite wells would result in lower water-level declines at neighboring wells. In addition, siting at least one of the new wells south of the Baseline fault (Figure 2-1) would reduce impacts to adjacent wells. The capacity of proposed wells to meet the project demand and water quality cannot be properly assessed without actually constructing and testing each well.

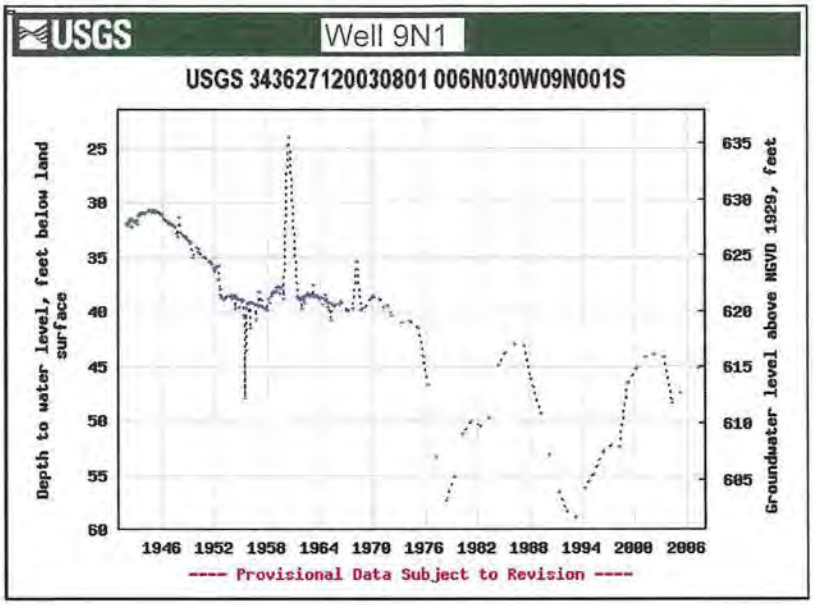
PROPOSED WATER DISTRIBUTION SYSTEM

This section describes the proposed water distribution, storage and pumping system required to serve Project Alternatives A and B. The potable water and fire suppression demands are anticipated to be served by a single water distribution system. An overview of the water system, including storage reservoirs and pumping station, and water distribution system, are shown on Figures 2-6 and 2-7, respectively, for Alternatives A and B. It is noted that the locations of the two new domestic water supply wells are not shown on these figures, as the actual locations will need to be determined as part of detailed design.

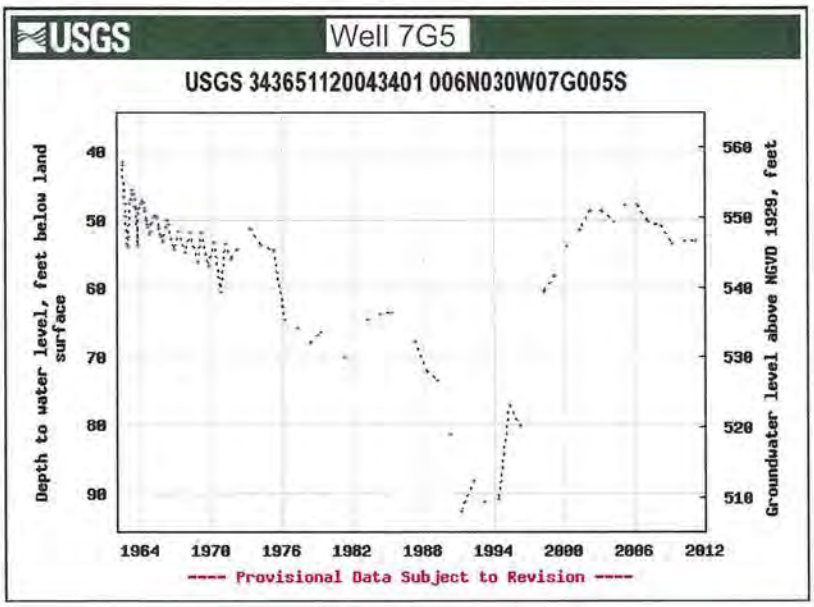
Distribution System

The following subsection describes water distribution system requirements for Alternatives A and B. The distribution system should be designed to ensure 40 psi pressure is delivered to each home during average demand conditions, and no less than 30 psi during peak hour flows. The distribution system should also be designed to ensure that during fire flows, a minimum residual pressure of 20 psi is achieved. If fire sprinklers are provided through the Project, higher residual pressures may be required. Again, this would be determined as part of detailed design.

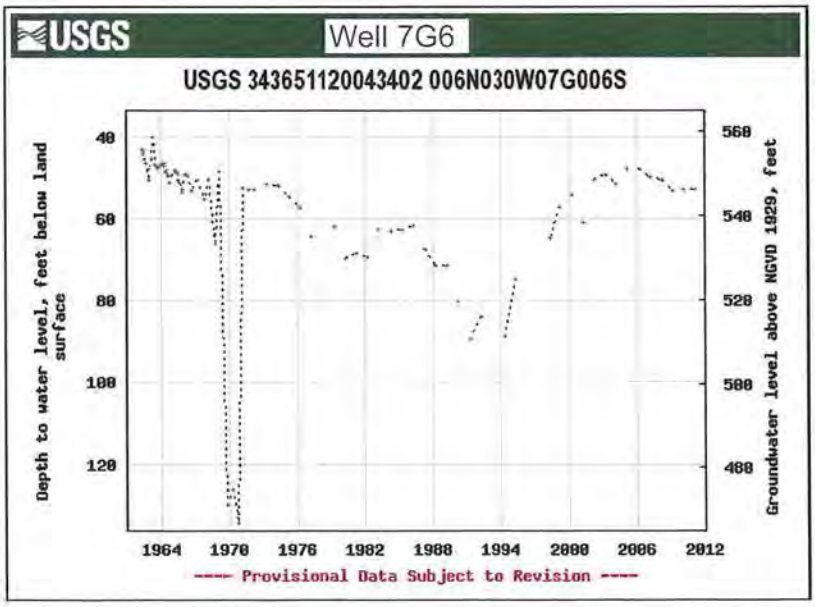
Alternative A. Interior roads and residential lots will have an elevation ranging from 695 feet to 850 feet above mean sea level (MSL). With this range in elevations, the water distribution system should include at least two separate pressure zones, to avoid unusually high and low static pressures in the distribution system. Even with two pressure zones, it is likely that several of the residences may require individual pressure reducing valves at their residential water connection to the water main. A minimum pipe diameter of 8-inches is recommended throughout the water system. However, consideration to provide a 12-inch diameter main “loop” should be given, to reduce the potential for undesirable surge pressures (by reducing line velocities). A detailed hydraulic analysis of the water system is beyond the scope of this study; however, given the nature of the layout of the roads, high and low points, the need for several dead-end mains, and the required fire flows, hydraulic design considerations will be important in the overall design of the water system.



Latitude 34°36'27", Longitude 120°03'08" NAD27
Land-surface elevation 660.00 feet above NGVD29
The depth of the well is 160 feet below land surface.



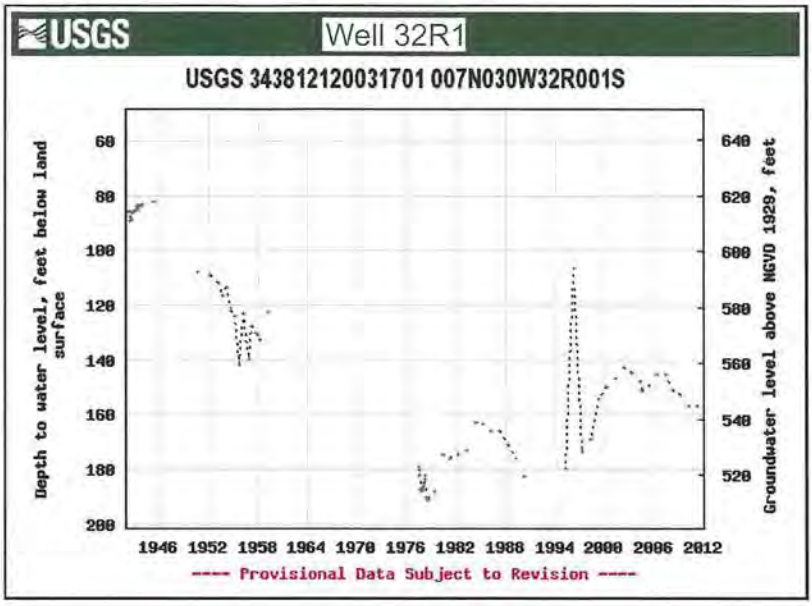
Latitude 34°36'51", Longitude 120°04'34" NAD27
Land-surface elevation 600.00 feet above NGVD29
The depth of the well is 158 feet below land surface.



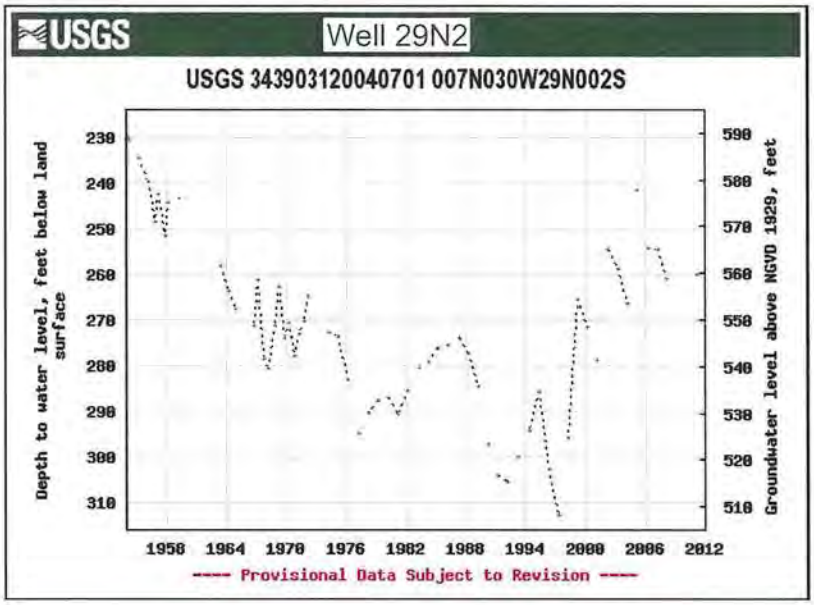
Latitude 34°36'51", Longitude 120°04'34" NAD27
Land-surface elevation 600.00 feet above NGVD29
The depth of the well is 410 feet below land surface.

Figure 2-4
Water Level Hydrographs
Wells 9N1, 7G5, 7G6
Chumash Camp 4

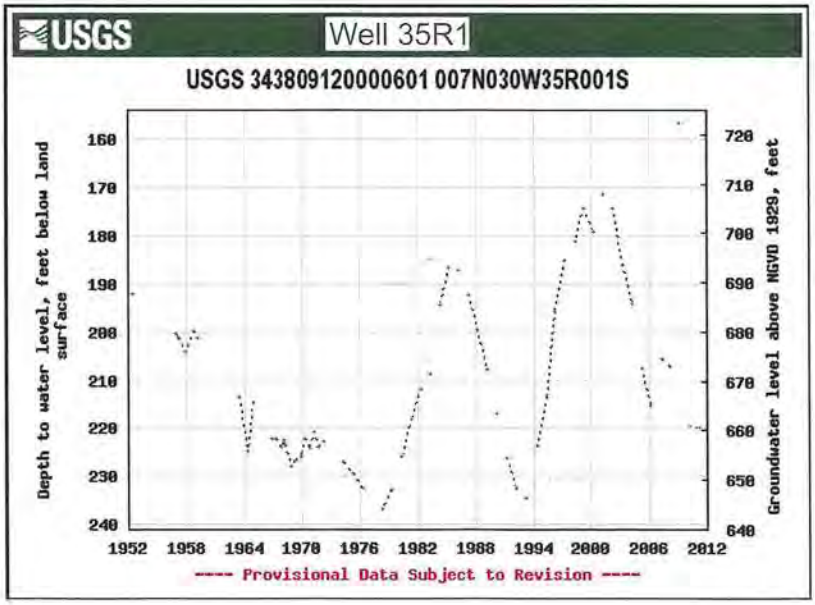
Cleath-Harris Geologists



Latitude 34°38'12", Longitude 120°03'17" NAD27
Land-surface elevation 701.00 feet above NGVD29
The depth of the well is 186 feet below land surface.



Latitude 34°39'03", Longitude 120°04'07" NAD27
Land-surface elevation 820.00 feet above NGVD29
The depth of the hole is 485 feet below land surface.



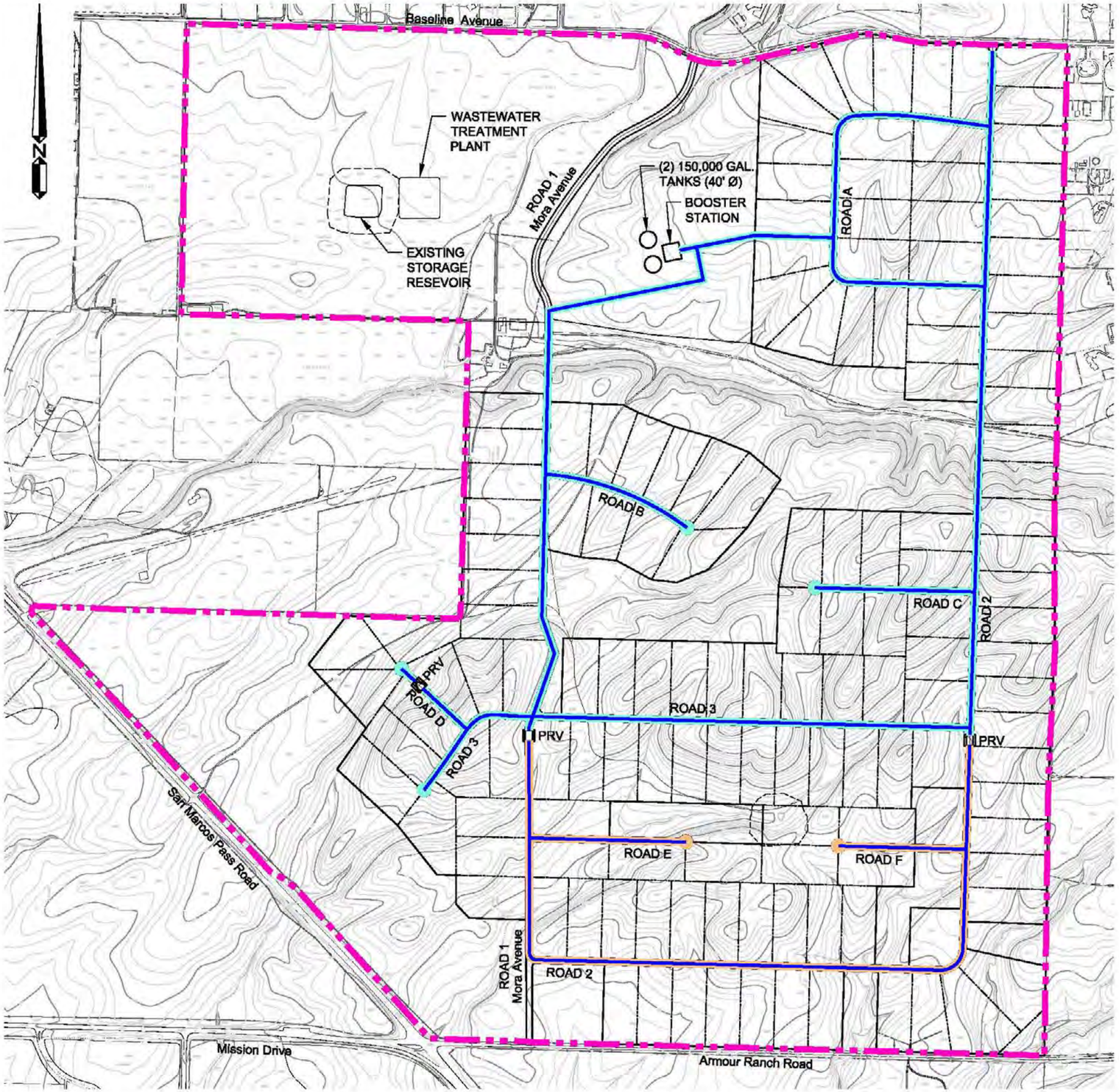
Latitude 34°38'09", Longitude 120°00'06" NAD27
Land-surface elevation 880.00 feet above NGVD29
The depth of the well is 288 feet below land surface.

Figure 2-5
Water Level Hydrographs
Wells 32R1, 29N2, 35R1
Chumash Camp 4

Cleath-Harris Geologists

It is envisioned that there will be two pressure zones for this Alternative A, to best serve all of the residences, avoid excessive water line pressures, and to meet minimum service pressures. Refer to Figure 2-8 for a hydraulic profile graphically depicting the envisioned water pressure zones, in relationship to residences, water storage and pumping facilities, and water supply wells.

Alternative B. Similar to Alternative A, interior roads and residential lots will have an elevation ranging from 695 feet to 850 feet above mean sea level (MSL). Hydraulically, the water system will be very similar to Alternative A, with a reduced pressure zone for the southern "loop". It is likely that the Government Center will be part of the main zone (higher pressure and hydraulic grade line). The pressure reducing station would be immediately downstream of the Government Center. The Government Center would have a water service lateral feeding off of the main line from the street, possibly with its own on-site water loop for water service and fire suppression, depending on layout of the Government Center facilities. This water system layout has no dead end mains like Alternative A; however, water main sizing should follow the same recommendations described for Alternative A. Details of the hydraulics would be determined during detailed design of the Project. The water system hydraulics are shown, similar to Alternative A, in Figure 2-8.



LEGEND:

- PROJECT BOUNDARY
- WATER STORAGE TANK
- BOOSTER STATION
- WATER DISTRIBUTION PIPELINE, MAIN PRESSURE ZONE
- WATER DISTRIBUTION PIPELINE, PRV ZONE 1
- ☐ PRV — PRESSURE REDUCING STATION
- ☑ PRV — INDIVIDUAL RESIDENTIAL PRESSURE REDUCING VALVE

NOTES:

1. REFER TO FIGURE 1-1 FOR LAND USE DESIGNATIONS.
2. DOMESTIC WATER WELLS ARE NOT SHOWN AS LOCATIONS WILL NEED TO BE DETERMINED AT A LATER TIME.

GRAPHIC SCALE
0 1000' 2000'
(IN FEET)
1 IN = 1000 FT

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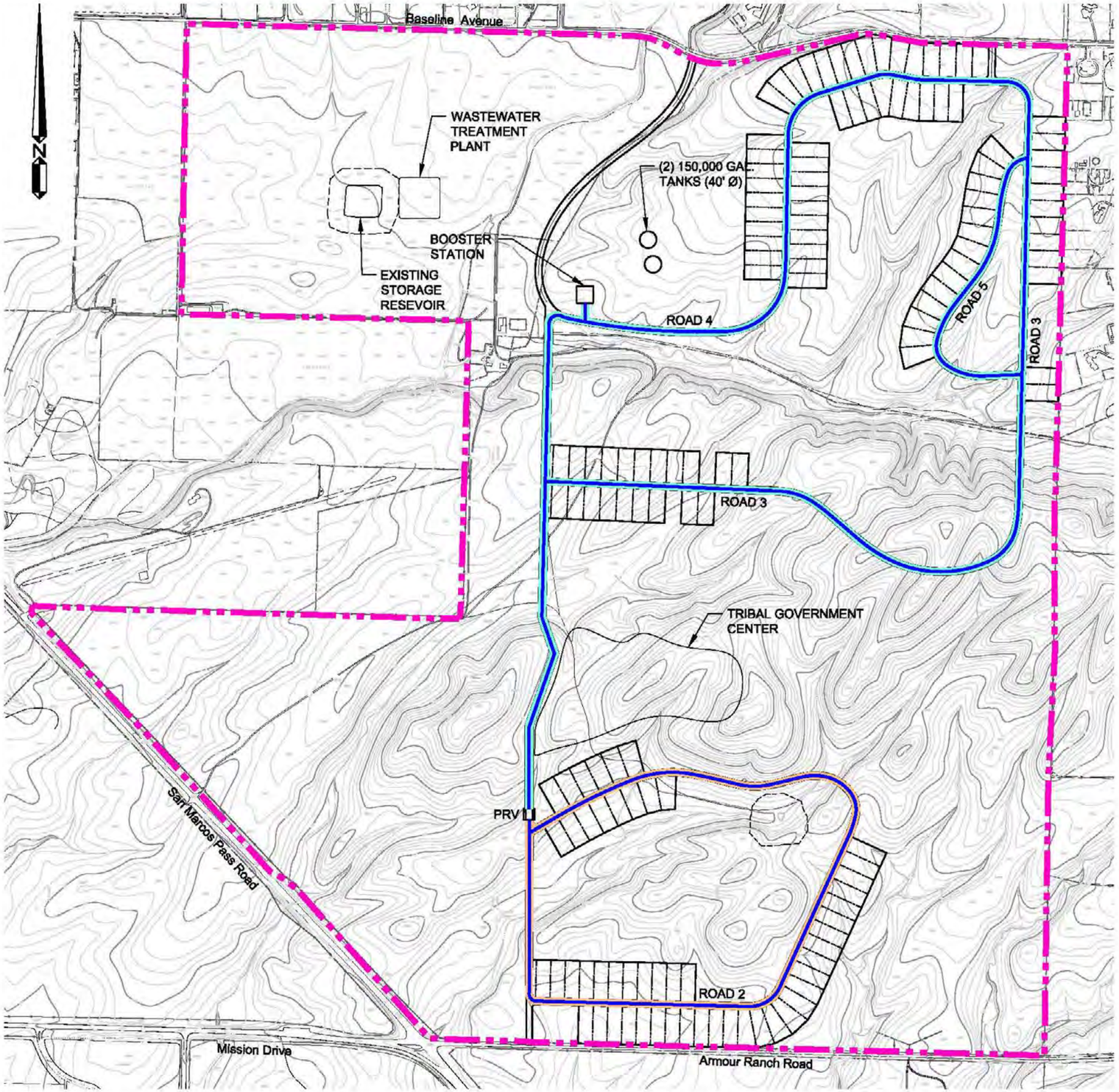
Figure 2-6
Waterline Layout - Alternative A



LEGEND:

- PROJECT BOUNDARY
- WATER STORAGE TANK
- BOOSTER STATION
- WATER DISTRIBUTION PIPELINE, MAIN PRESSURE ZONE
- WATER DISTRIBUTION PIPELINE, PRV ZONE 1
- PRV — PRESSURE REDUCING STATION

NOTES:

1. REFER TO FIGURE 1-2 FOR LAND USE DESIGNATIONS.
2. DOMESTIC WATER WELLS ARE NOT SHOWN AS LOCATIONS WILL NEED TO BE DETERMINED AT A LATER TIME.

GRAPHIC SCALE
0 1000' 2000'
(IN FEET)
1 IN = 1000 FT

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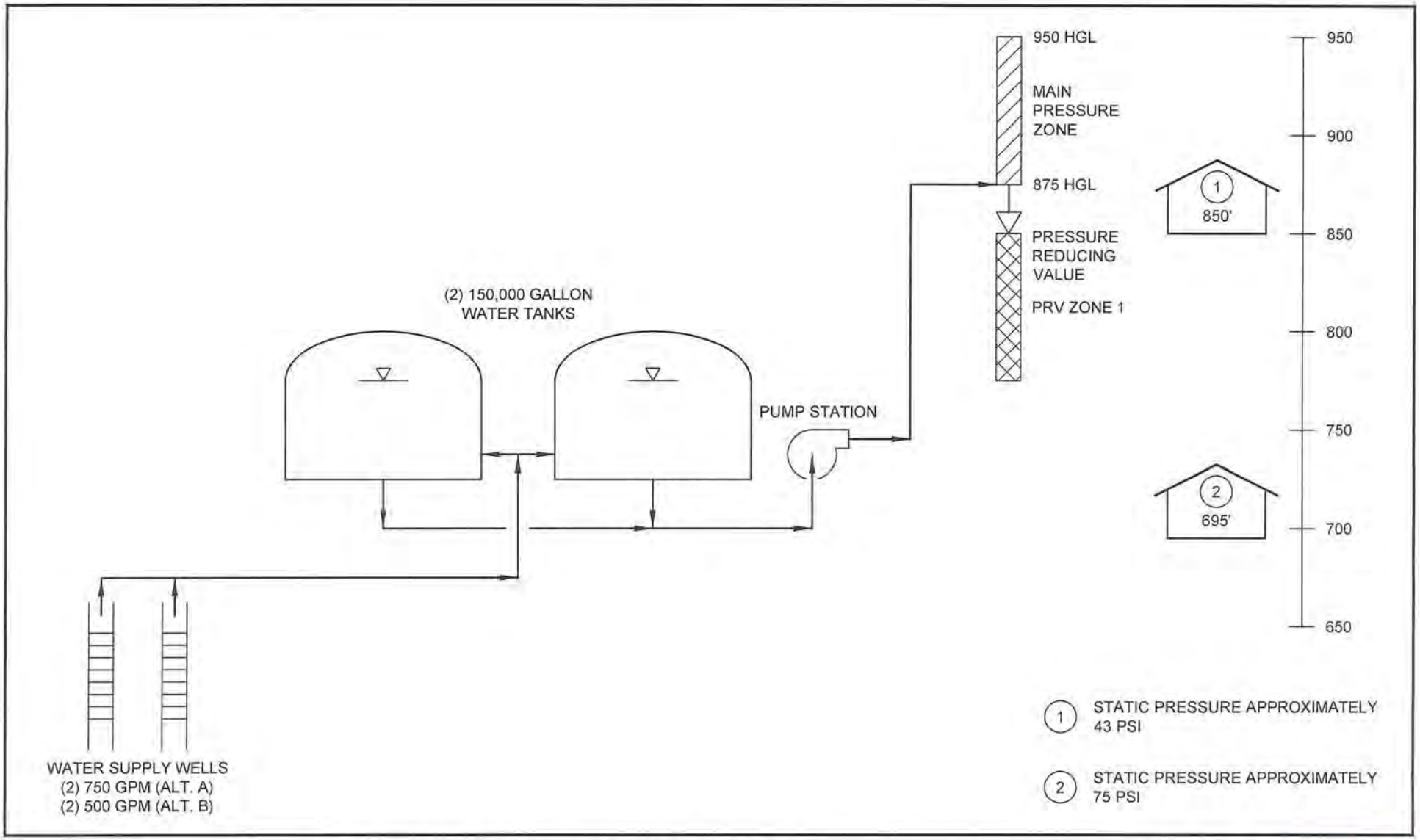
Figure 2-7
Waterline Layout - Alternative B



CHUMASH CAMP 4 FEE-TO-TRUST

Figure 2-8
Hydraulic Profile Of Water Distribution System

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Water Storage and Pumping

This section describes the proposed water storage and pumping facilities needed to serve the Project, Alternatives A and B. Storage requirements are summarized in Table 2-9.

Storage Requirements. Storage requirements for community systems are generally comprised of three components:

- Emergency Storage
- Fire Storage
- Operational Storage

Emergency Storage

Emergency storage is intended to provide for conditions such as extended power outages, pump failures, and similar problems. Most water planners accept that during emergencies, supply per capita may be reduced to minimum levels. Typically, on that basis, an emergency storage volume of 50 gpcd for three days is accepted as a reasonable value. Emergency storage for this Project is thus based on 500 permanent residents, for both Alternatives A and B.

Fire Storage

Fire storage is the volume of water needed to control an anticipated fire in a building or group of buildings. The determination of this storage is based upon a recommended flow rate, its duration, and a minimum residual pressure as established by the agency of interest. Based on experience in working with the County of Santa Barbara Fire Department, it is anticipated that with sprinklered buildings, the recommended fire flow will be 1,500 gpm for a duration of 2 hours.

Operational Storage

Operational storage is the amount of water needed to equalize the daily supply and demand. Without this storage, water production facilities large enough to meet the instantaneous peak demands of the system would be required. With adequate operational storage, well pumps can operate at the daily average rate, while storage facilities meet the hourly peaks. This operating method also prevents the unnecessary use of additional well pumps at times when electrical rates are the highest. Based on the typical daily water use patterns of most communities, it is recommended that the required operational storage be approximately 25 percent of the total water use for any given day. For Alternative A, maximum day demand equals 0.308 mgd; for Alternative B, maximum day demand equals 0.148 mgd. The American Waterworks Association (AWWA) Manual of Practice M-32 recommends operational storage of 20 to 25 percent of build-out average day demand for the given zone, or up to 15 percent of the ultimate maximum day demand. Storage recommendations for Alternatives A and B are based on storage for 25% of maximum day demand.

Table 2-9. Summary of Storage Requirements – Alternatives A and B

Alternative	Storage Component (rounded numbers)			
	Emergency	Fire	Operational	Total (rounded)
A	75,000	180,000	77,000	330,000
B	75,000	180,000	37,000	300,000

It is noted that detailed siting of water storage tanks is beyond the scope of this study. However, based on site topography, and location of proposed residential lots, both Alternatives will require some degree of pumping from storage reservoirs. Full gravity flow and pressure from storage reservoirs cannot be accommodated due to the higher elevations of the lots. For both Alternatives, water storage was envisioned to be at approximately elevation 725. The tanks should be located where relatively accessible for maintenance, while protecting the existing view sheds.

The water storage reservoirs are envisioned to be welded steel tanks (at-grade), meeting current standards for tank design and seismic requirements. Alternatively, should it be desired to further screen or hide the tanks from view, the tanks could be pre-stressed concrete tanks that can be partially or fully buried.

Booster Station – Alternative A. The water system will require a booster station, rated at 2,250 to 2,500 gpm to achieve fire flow demand of 1,500 gpm plus domestic demands. Given site and storage reservoir elevations, the pumps will need to be rated for approximately 250 feet total dynamic head (TDH). Consideration could be given to locating the storage reservoirs at a higher elevation and thus reduce the pumping head requirements of the booster station. This would increase the head requirements for pumping from the wells to the storage reservoirs, however. The pump station should be designed to also operate efficiently at low flows, thus provision for a small "jockey" pump to handle night-time flows should be considered. The booster station should be equipped with emergency standby power provisions (generator) to ensure uninterrupted service in the event of power outages.

Booster Station – Alternative B. Booster Station recommendations for this Alternative would be very similar to that described for Alternative A, except that the total pumping capacity could be reduced slightly to 2,000 gpm.

CHAPTER 3

WASTEWATER SYSTEM

The wastewater system includes collection, treatment and reuse/disposal of all products of the treatment processes including:

- Effluent water
- Bio-solids
- Screenings

The intent is to provide a high quality system so that the treatment meets the water quality for unrestricted reuse on the property, that bio-solids can be disposed economically, and screenings can be disposed in a conventional (publicly-owned and operated) landfill.

WASTEWATER FLOWS

Based on Tables 2-1, 2-2 and 2-3 showing domestic water demands (and Tribal Government Center water demands for Alternative B), wastewater flows were calculated based on:

- 90% of domestic water demand generates wastewater flow
- Permanent population of 500 (3.5 persons per household)
- 40 employees at Tribal Government Center
- 100 Tribal Office Complex events per year, drawing up to 400 people per event, including food preparation for these events. (as noted earlier, this demand offsets the same water demand that would otherwise be seen at the Tribal Hall, North Reservation, water served by ID1).

Based on the above assumptions and factors, wastewater flows to the wastewater treatment plant (WWTP) are summarized as follows:

- Alternative A – 30,000 gpd average dry weather flow (ADWF)
- Alternative B – 31,000 gpd ADWF

WASTEWATER COLLECTION SYSTEM

The collection system will provide capacity to convey the ultimate wastewater flow at peak hydraulic conditions. These conditions include the potential for a diurnal maximum flow when all development is complete and the flows may include an allowance for nominal pipeline infiltration as considered feasible according to maximum EPA limitation (200 gallons per inch diameter per mile per day).

The collection system will also include a number of gravity sewer manholes, 48” diameter, and spaced at intervals for ease of access for maintenance. Typically, manhole spacing for the size

pipelines considered will be on the order of 300 feet, and also where significant grade breaks and bends occur in the gravity sewer system.

Gravity Sewer System

The gravity sewer system will be comprised of four-inch diameter laterals between buildings and street mains, eight-inch diameter street mains, and interceptor pipelines ranging in diameter from 8-inches to 15-inches.

The minimum diameter for street mains and interceptors is eight inches for ease of maintenance. The actual design will be based on two criteria:

- Capacity is required for peak hydraulic flow and this determines the combination of diameter and slope
- Because slope is also a result of the topography, the pipe diameter may be controlled as a function of slope and the ability to meet a minimum velocity which would be defined as meeting a velocity of 1.3 feet per second at a depth of flow ratio to pipe diameter of 0.2. (Steeply sloping topography makes this issue disappear. When the topography is relatively flat, to maintain an adequate slope may require inclining pipeline profiles deeply below grade in order to satisfy the minimum velocity requirement

Sewage Lift Stations

Sewage lift stations will be constructed as submersible pumping unit stations utilizing circular precast concrete vaults, lined for corrosion protection, equipped with duplex pumping units for redundancy and backup, and level controls for starting, stopping pumping units and signaling alarms for failure conditions.

If the depth of pipelines becomes excessive (more than 20 feet below grade), then consideration is given to the benefit of raising the pipeline profile to a shallower level by the installation, and use of a lift station. Where individual homes may require a solitary pumping unit to pump residential wastewater into the collection system, a sub-grade sump with an automatically- controlled grinder pump will be installed on the owner's property where the home waste plumbing will directly discharge into the sump and the sump discharge will go into a street main.

The collection system is envisioned to be a combination of eight-inch diameter PVC gravity pipelines, four-inch diameter PVC force mains, and small pumping stations and individual home grinder pump sump installations. Details of pipeline diameter and material selection would be confirmed during detailed design.

Collection System – Alternative Layout A. The composition of this system is based on the Program definition described in Chapter 1 of this report, and Figure 1-1. The recommended sewer collection system layout for Alternative A is presented in Figure 3-1.

LEGEND:

- PROJECT BOUNDARY
- GRAVITY SEWER
- (X) REFER TO TABLE 3-1 FOR CORRESPONDING SEWER PIPE DESCRIPTIONS

NOTE:

REFER TO FIGURE 1-1 FOR LAND USE DESIGNATIONS

GRAPHIC SCALE
0 1000' 2000'
(IN FEET)
1 IN = 1000 FT

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Figure 3-1
Sewer Collection System Layout - Alternative A

The pipelines are summarized in Table 3-1. For Alternative A, the topography, if not modified, would lead to the installation of as many as 10 pumping stations and short force mains or inverted siphons to cross beneath washes. However, for planning purposes, it will be assumed that these wash crossings will be graded for the dual objectives of providing a manageable roadway profile for ease of transportation and to allow a continuous profile of gravity sewer pipelines.

Table 3-1. Summary of Sewer Pipelines – Alternative A

Line Number	Description	Length, feet
1	8" gravity sewer, Road 2 connecting with Road A, south of Baseline Ave. to intersection with Sewer Pipeline 14	2,500
2	8" gravity sewer, Road A loop along a loop, connecting to Road 2	3,500
3	8" gravity sewer, Road 4 to Sewer Pipeline 14	1,900
4	8" gravity sewer, Road C connecting to Road 2	1,300
5	8" gravity sewer, Road 2 to Road 1 loop, extending from Road C to Road 1, to Sewer Pipeline 15	12,500
6	8" gravity sewer, eastern portion of Road 3	1,600
7	8" gravity sewer, Road F	1,000
8	8" gravity sewer, Road E	1,200
9	8" gravity sewer, western portion of Road 3 connecting through property to Road 1	1,200
10	8" gravity sewer, Road 3 west of Road 1	500
11	8" gravity sewer, western portion of Road 3	1,500
12	8" gravity sewer, aligned west and north of Road 3 properties, west of Road 1	1,300
13	8" gravity sewer, Road B	1,750
14	8" gravity sewer, connecting Road 2 to Road 1 paralleling large east-west drainage wash	3,600
15	12" to 15" gravity interceptor line to WWTP from Road 1	1,500
TOTAL		36,850

See Figure 3-2 for layout of sewer collection system.

Collection System – Alternative Layout B. The composition of this system is based on the Program definition described in Chapter 1 of this report, and Figure 1-2. The recommended sewer collection system layout for Alternative A is presented in Figure 3-2. The pipelines and a single pumping station are summarized in Table 3-2 for Alternative B. Just as in Alternative A, the assumption is made that numerous washes will be graded to facilitate both ease of roadway driving and to allow a continuous gravity sewer pipeline through the washes. There will be one unavoidable exception in Alternative B where a pumping station will be required.

WASTEWATER TREATMENT SYSTEM

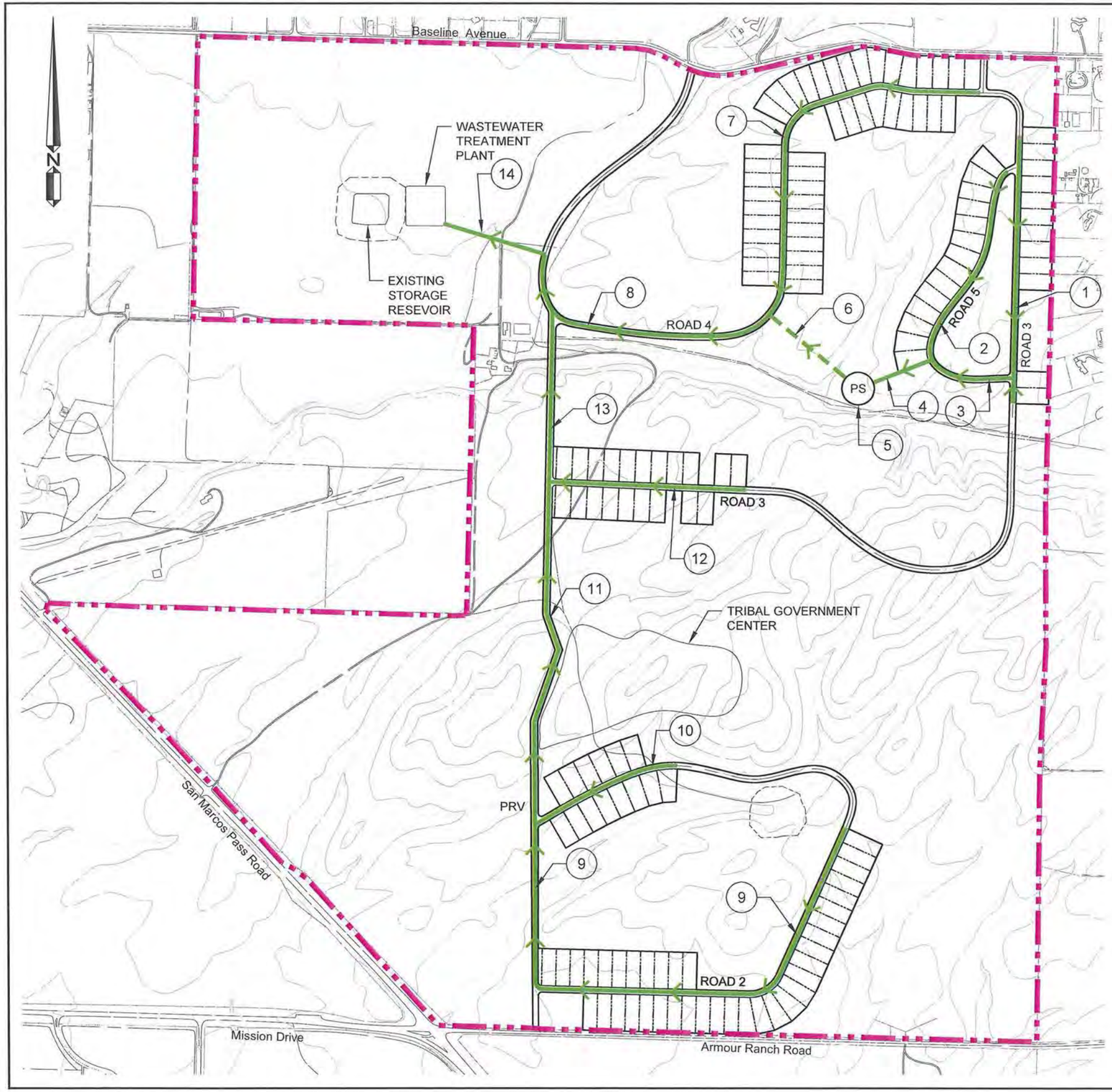
The wastewater treatment system will be designed to receive a high strength domestic waste based on experience of this type of customer base including residential, some office, and Tribal Office Complex wastewater. It is envisioned that the Office Complex will include food preparation facilities, and thus a higher strength wastewater is anticipated. For planning, the strength of wastewater will be assumed to be as presented in Table 3-3. The table also presents the required effluent quality for the purpose of recycling as an unrestricted (meeting same requirements as California Code, Title 22) reuse.

Wastewater Process Selection

The objective is to produce a reusable effluent that does not create a restrictive constraint on the area of beneficial use. This means that in the issue of health and safety, the industry defined quality is known as a “tertiary - 2.2 coliform” effluent. It means the effluent is the highest level of treatment currently practiced and offers the widest possible array of reuse options. From a practical standpoint, it means that the effluent can be spray irrigated in agricultural areas without restriction of humans and animals in the area of application.

In order to process the expected wastewater, based on volume, strength, and the variations of flow, the number of options for treatment has been narrowed to three that are deemed both feasible and cost-effective:

1. Sequencing batch reactor with tertiary filtration, ultraviolet (UV) disinfection, and sludge holding (and probably with dewatering)
2. Multiple Stage Activated Biological Process (MSABP), with tertiary filtration, and UV disinfection
3. Modified Ludzack-Ettinger (mLE) process reactor with tertiary filtration, UV disinfection, and sludge holding (and probably with dewatering)



LEGEND:

- PROJECT BOUNDARY
- (PS) SEWAGE PUMP STATION
- GRAVITY SEWER
- FORCE MAIN
- (X) REFER TO TABLE 3-2 FOR CORRESPONDING SEWER PIPE DESCRIPTIONS

NOTE:

REFER TO FIGURE 1-2 FOR LAND USE DESIGNATIONS

GRAPHIC SCALE

0 1000' 2000'

(IN FEET)

1 IN = 1000 FT

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Figure 3-2
Sewer Collection System Layout - Alternative B

Table 3-2. Summary of Sewer Pipelines – Alternative B

Line Number	Description	Length, feet
1	8" gravity sewer, Road 3 south of Baseline Avenue	1,800
2	8" gravity sewer, Road 5 (flowing southerly) to Sewer Pipeline 4	1,800
3	8" gravity sewer, Road 5 (flowing northerly) to Sewer Pipeline 4	600
4	8" gravity sewer from Road 5 to Pumping Station	500
5	Pumping Station	
6	4" force main from Pumping Station to Road 4	1,300
7	8" gravity sewer, Road 4 to tie-in with force main	4,000
8	8" gravity sewer, Road 4 from force main to Road 2	2,300
9	8" gravity sewer, eastern loop of Road 2 to Sewer Pipeline 10	5,200
10	8" gravity sewer, northwestern loop of Road to north/south leg of Road 2	1,300
11	8" gravity sewer, Road 2 between Sewer Pipeline 10 and Road 3	2,500
12	8" gravity sewer, western leg of Road 3	1,700
13	8" gravity sewer, Road 2 between Road 3 and Road 4	1,500
14	12" to 15" interceptor sewer, Road 4 to WWTP	1,500
TOTAL		26,000

See Figure 3-2 for layout of sewer collection system.

Table 3-3. Influent and Effluent Wastewater Characteristics

	Constituent	Units	Value
Influent:			
(BOD)	Biochemical Oxygen Demand	mg/l	600
(TSS)	Total Suspended Solids	mg/l	350
(TKN)	Total Kjeldahl Demand	mg/l	75
(TP)	Total Phosphorus	mg/l	20
Effluent:			
(BOD)	Biochemical Oxygen Demand	mg/l	10
(TSS)	Total Suspended Solids	mg/l	10
NH3	Ammonia	mg/l	1
T.I.N.	Total inorganic nitrogen	mg/l	8
T.N.	Total nitrogen	mg/l	8
T.P.	Total phosphorus	mg/l	3
Coliform	Total coliform	mpn/100 ml	2.2
	Turbidity	NTU	2

Each of these combinations is capable of meeting the project needs; each has some specific advantages which will be summarily presented in this chapter. For purposes of the recommendations in the wastewater system, only one of these three will be presented in detail.

Wastewater Treatment Plant Capacity – Alternative A. Based on the development plans proposed for Alternative A, as summarized in Table 1-1, the capacity required in the treatment plant at build out will be 31,000 gallons per day of average dry weather flow. The distinctions of Alternative A that separate it from Alternative B are:

- 143 Five acre lots
- 206 acres of open space/recreational use and trails

For the normal design practice, a peaking factor must be estimated to apply to the average dry weather flow. Small systems require high peaking factors. For this system, a peaking factor of 3.0 will be assumed.

Wastewater Treatment Plant Capacity – Alternative B. Based on the development plans proposed for Alternative B, as summarized in Table 1-1, the capacity required in the treatment

plant at build out will be 31,000 gallons per day of average dry weather flow. The distinctions of Alternative B that separate it from Alternative A are:

- 143 One- acre lots
- 755 acres of open space/recreational use and trails
- Addition of Tribal Office Complex

For the normal design practice, a peaking factor must be estimated to apply to the average dry weather flow. Small systems require high peaking factors. For this system, a peaking factor of 3.0 will be assumed.

Wastewater Treatment Plant Description

The wastewater treatment plant will be capable of processing the influent wastewater and producing the effluent by means of the plant process units outlined below in Table 3-4.

Table 3-4. Description of Wastewater Treatment Process Units

Item No.	Process Unit	Number of Units	Type	Criteria
	Headworks:			
1	Screens	2	Auto	1 mm
2	Grit cyclone *	2		PWWF
3	Grit classifier *	1		PWWF
	Biological Treatment:			
4	Treatment Basins	12	A	ADWF
5	Effluent Equalization Basin	1	A or B	PWWF
	Final Effluent:			
6	Filtration	2	Cloth	ADWF
7	Disinfection	2	UV	ADWF
	Equipment:			
8	Influent Pumping Units	3	Submersible	PWWF
9	Internal Recyle Pumping	4	Centr.	ADWF
10	Effluent Pumping	2	Centr.	ADWF
11	Aeration Blowers	3	Pos Displ.	Max Mo.

A=Concrete
B=Steel
** - Optional - assessment of grit potential during design*

Influent Pumping and Transfer Pumping. There will be two categories of pumping units; submersible type pumping units for influent pumping, and end suction dry pit units for transfer puming. The submersible units are installed with an easily removable connection with cable for ease of pulling pumps for maintenance.

Headworks (Screening and De-gritting). Screening is a highly variable choice of equipment. The size of treatment plant, the nature of waste material, and objective for removal of material are equally important factors in choosing the right screen. Maintenance requirements are dependent on the choice made. For the plant proposed, there are at least three possible choices that would be appropriate. The three most logical types for the proposed plant are:

- A cylindrical metal (stainless steel) screen with small (1 mm) opening size
- A continuous belt type unit with medium opening size range (6 to 8 mm)
- A step screen also with medium opening size range (6 to 8 mm)

Detailed selection of such equipment is beyond the scope of this study.

Biological Treatment**.** The three types of biological treatment processes described above (SBR, MSABP, and mLE) will be described in detail below: Each of these processes will produce a secondary effluent of a quality so that a conventional tertiary filtration process, followed by disinfection, will produce a final effluent meeting the requirements of effluent for unrestricted reuse.

1. Sequencing batch reactor – this process has certain unique characteristics as presented in the Table 3-5.

Table 3-5. Characteristics of Sequencing Batch Reactor

Factor	Unique Characteristics of the Overall Process Train
Tanks	Tanks are large - based on 24-hour detention time
Energy	Not energy efficient due to variable water level
Flexibility	Very flexible - capable of high turndown ratio
Operation	Simple operation - controlled by single PLC
Screenings	Normal amount based on 6-8 mm opening size
Effluent	Excellent quality
Bio-solids	Large quantity
Concept	Alternate tanks fill and process in batches based on 5 cycles per 24 hrs

2. Multi-stage activated biological reactor – this process' characteristics are presented in Table 3- 6.

Table 3-6. Characteristics of Multi-Stage Biological Reactor

Factor	Unique Characteristics of the Overall Process Train
Tanks	Tanks are large - based on 40-hour detention time
Energy	Energy efficient due to constant water surface
Flexibility	Moderately flexible
Operation	Simple operation - controlled by single pLC
Screening	Large amount based on 1 mm screen size
Effluent	Superior quality - clarifier is just a backup
Bio-solids	Minimal quantity - mostly reduced in secondary process
Concept	12 stages of bioreactor - multiple stages of oxic and anoxic biology

3. Modified Ludzack Ettinger - this process' characteristics are presented in Table 3-7.

Table 3-7. Characteristics of Modified Ludzack Reactor

Factor	Unique Characteristics of the Overall Process Train
Tanks	Tanks are small - based on 12 hour detention time
Energy	Energy efficient due to constant water surface
Flexibility	Moderately flexible
Operation	Requires daily interaction by operator
Screenings	Normal amount based on 6-8 mm opening size
Effluent	Excellent quality
Bio-solids	Large quantity
Concept	High rate with multiple recycle streams in 2-stage reactor

Flow Equalization. Effluent equalization is valuable ahead of the tertiary and disinfection processes because it eliminates the hydraulic flow variability, and thus minimizes size/capacity requirements of downstream process units. The design capacity then gets reduced to the maximum month flow at the build out stage of development, as opposed to peak hourly flow. The equalization basin is usually sized for a fraction (20 to 40 percent) of the daily flow at the rated average capacity of the plant. In this case, the volume would be between 8,000 and 16,000 gallons. Because the plant is small (only 40,000 gallons per day) the more conservative volume of 16,000 gallons is recommended.

The basin should be designed for the supply side to be provided by gravity and the discharge side by pumping if the site topography and geology restricts the ability to allow a continuous gravity system to the final effluent discharge point.

Tertiary Treatment**.** **T**he most cost effective type of system for this plant would be a cloth disk filter unit. The units are constructed to have a basin enclosure that contains the secondary effluent submerging a number of cloth covered disks that rotate and allow the water to penetrate the cloth, leaving behind the filter reject materials, primarily particulate material that represents suspended solids, and turbidity. The cloth disks are periodically sprayed with a clean water stream to remove accumulated particulates from the individual disks. Also, a periodic backwash cycle pumps water fro the basin as the cumulated reject material increases within the basin. However, a steady supply of secondary effluent enters the basin allowing the disk filters to continuously filter uninterrupted.

Disinfection. Two methods of disinfection are practical for the 40,000 to 50,000 gpd size plant. The easiest to operate is the ultraviolet (UV) type. For such a small size, the low pressure, low intensity type is the most cost-effective. Several manufacturers make this type of UV system. They are available in both open channel and closed conduit configuration. The advantage of open channel is ease of access and the advantage of closed conduit is compactness.

Generally speaking, a UV system is more expensive to operate than a sodium or calcium hypochlorite disinfection system because the cost of electrical power used is more expensive than the cost of chemicals. However, on a small system, the cost of maintenance becomes a more significant factor. Maintaining a chemical feed system such as hypochlorite requires more diligence and attention to equipment condition than does a UV system. Also, hypochlorite systems are intricate in the feed and control systems and generally require periodic surveillance to make sure all parts are functioning properly.

SUMMARY OF ALTERNATIVE PROCESS TRAINS

The complete process trains for three alternatives are compared in Table 3-8. A process schematic of the entire recommended process train is presented in Figure 3-3. This schematic illustrates the sequence of the primary liquid stream though each step of the treatment process. It illustrates the disposition of the end products of the treatment (effluent for reuse, bio-solids, and screenings). It does not illustrate the numerous internal process loops or the various additive process inputs such as the aeration or mixing air, the chemical feed systems, or instrumentation and controls. During design, individuals process and instrumentation drawings will present that level of detail.

Table 3-8. Comparison of Treatment Process Schemes

Factor	MSABP	SBR	MLE
Screenings Volume	Very high due to small screen opening size (1 mm)	Moderate due to size of screen opening (6-8 mm)	Moderate due to size of screen opening (6-8 mm)
Power Usage	Moderate usage overall; MSABP high; sludge zero	High due to varible depth and low transfer efficiency	Moderate; low on mLE but also needed for sludge
Tank Volume	High	Moderate	Low
Sludge Volume	Low	Moderate	Moderate
Effluent Quality	High	High	High
Ease of Operation	Dictated by tertiary and disinfection	Dictated by tertiary and disinfection	Dictated by tertiary and disinfection
Maintenance	Moderate	Moderate	Moderate
Process Flexibility	Highly flexible (turndown ratio is high)	Highly flexible (turndown ratio is high)	Moderately flexible (turndown ratio is moderate)

A layout for the process units and ancillary facilities is presented in Figure 3-4. In this figure, the approximate sizes and locations of the process units and the ancillary buildings are shown. The plant will have a fenced area of approximately one acre, allowing for a 50-foot buffer around all buildings, and providing access for all building and process areas that will require ingress for maintenance. This site would be secured by an 8-foot high fence and accessed through one of two 20-foot gated openings. The site would be partially asphalt paved and partially landscaped with low maintenance cover such as gravel and shrubbery.

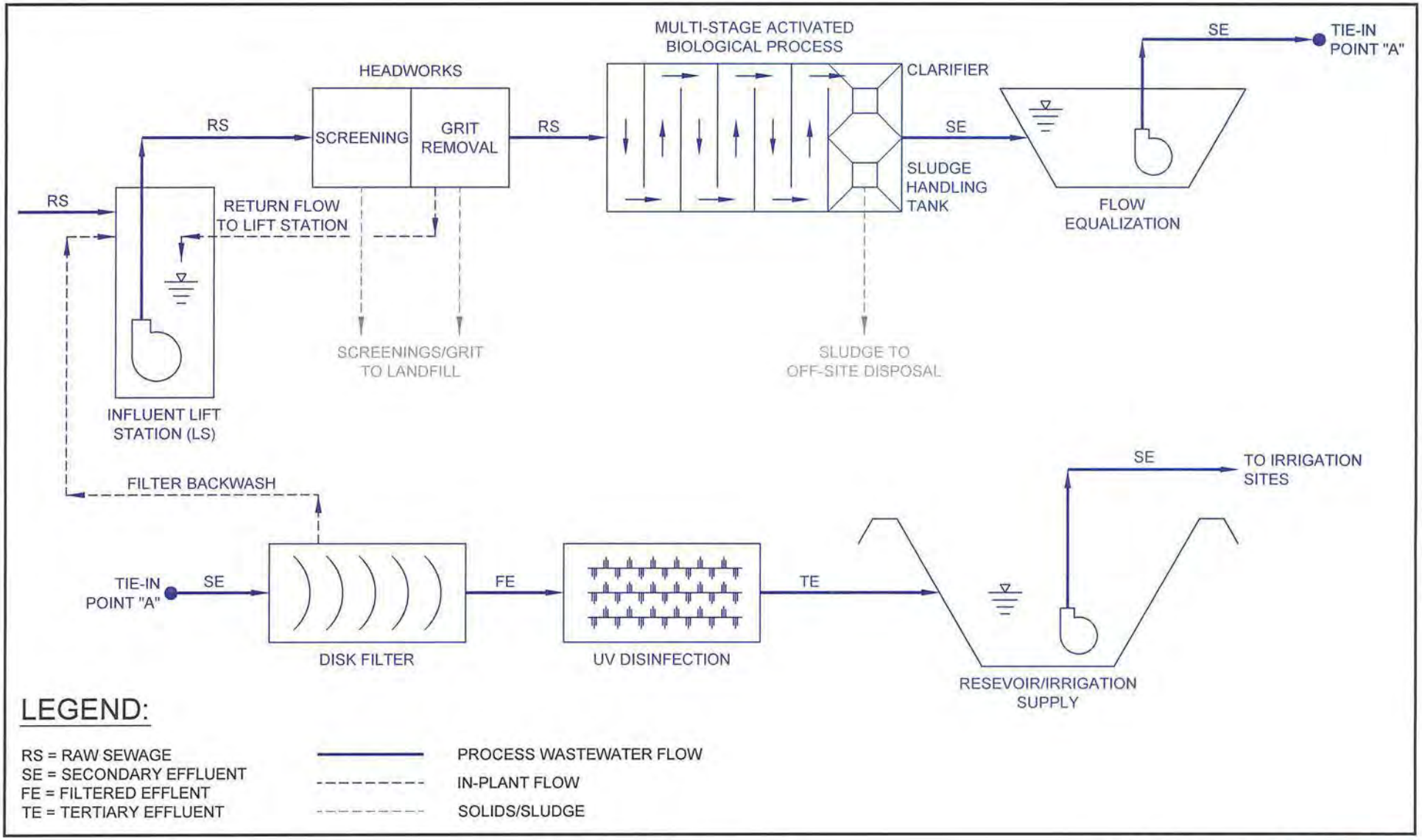

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Figure 3-3
Recommended Wastewater Process Flow Schematic

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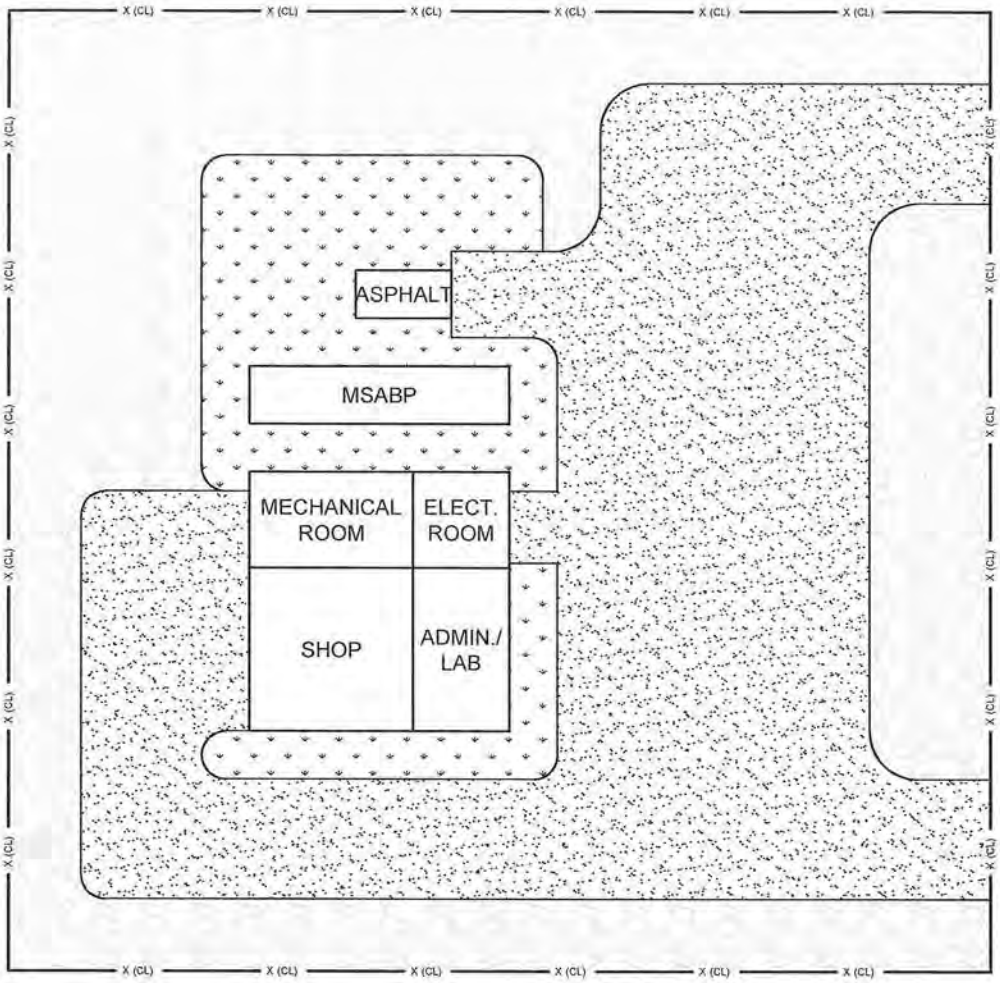

LEGEND:

GRAVEL, SHRUBBERY MAY BE INCORPORATED

GRASS/LANDSCAPING

ASPHALT

X (CL) — CHAIN LINK FENCE

MSABP — MULTIPLE STAGE ACTIVATED BIOLOGICAL PROCESS

GRAPHIC SCALE

0 20' 40' 80'

(IN FEET)

1 IN = 40 FT

N

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Figure 3-4
Wastewater Treatment Plant Layout

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RECYCLED WATER DISTRIBUTION AND STORAGE

The purpose of recycling is twofold; to supplement the use of groundwater in irrigation, thus conserving the potable water supply (and reduce groundwater pumping demand), and secondly to beneficially reuse the effluent in a manner that avoids creating a point discharge to a known waterway.

In order to manage the entire annual effluent, a comprehensive plan for reuse, storage, and distribution becomes necessary. In the southwestern United States, the most critical element of a comprehensive plan is formulating a sound storage system that addresses daily, monthly and seasonal storage requirements.

The first decision is to make the storage a joint use process; a storage facility that can allow water to be withdrawn without upsetting the biology and secondly a facility that can maintain a stable, balanced biological system of clean water, microorganisms for sustaining an aquatic food chain, and a water chemistry that does not accumulate inorganic salts.

From a practical perspective, this means the storage must be deep (more than 20 feet deep), cold (allow a high dissolved oxygen concentration), and conducive to plant growth (a soil-based bottom). Inevitably, some change will occur over time and this means that some maintenance will become necessary. However, that maintenance level of effort is minimized when the water is allowed to develop a balanced biological system of plants and aquatic animals.

Determining the size of the storage is based on two principals; a pre-determined depth for successful operation and a volume that allows the required seasonal storage in addition to a permanent volume for sustainability of the pond itself. The seasonal storage requirement is a mathematically-determined volume that represents the volume that would be accumulated during the colder months of the year when demand is diminished and the effluent continues to supply the pond on a regular basis.

Recycled Water Irrigation System

The design of a recycled water irrigation system shall provide adequate distribution to apply the water based on a combination of water duty factor (acre-feet per acre per year, or simply feet per year) and when using recycled water, an agronomic application must be considered based on specific vegetation assimilation rates. For example, duty factors can vary from less than one foot per year up to seven feet per year for certain tree grown nut crops (i.e. pecans). It is understood that the project site will use recycled water for both an existing vineyard and for more common grass and shrubbery type landscaping. These types of irrigation requirements can vary from less than one foot per year to approximately three feet per year, depending on the system efficiency. A summary of the expected irrigation supply of recycled water is presented in Table 3-9.

Table 3-9. Monthly Water Balance

Month	WWTP	Pond			Evap, Inches - c	Pond	Vineyard	NET	Potable Supple-ment	Storage Volume	Vol. - Yr. N+1	Vol. - Yr. N+2
	Effluent, Af-a	Rainfall, inches -b	Rainfall, AF	Supply, AF		Evap., AF	Irrigation, AF	Surplus, AF				
January	4.28	3.78	0.32	4.60	1.68	0.14	0	4.46	0.00	4.46	16.98	16.98
February	3.87	4.18	0.35	4.22	2.21	0.18	0	4.03	0.00	8.49	21.02	21.01
March	4.28	3.07	0.26	4.54	3.52	0.29	20	-15.75	7.26	0.00	5.26	5.26
April	4.14	1.28	0.11	4.25	5.01	0.42	30	-26.17	26.17	0.00	0.00	0.00
May	4.28	0.30	0.03	4.31	5.78	0.48	30	-26.17	26.18	0.00	0.00	0.00
June	4.14	0.09	0.01	4.15	6.18	0.52	40	-36.36	36.36	0.00	0.00	0.00
July	4.28	0.03	0.00	4.29	6.40	0.53	40	-36.25	36.25	0.00	0.00	0.00
August	4.28	0.06	0.01	4.29	6.01	0.50	40	-36.21	36.21	0.00	0.00	0.00
September	4.14	0.25	0.02	4.17	4.46	0.37	25	-21.21	21.21	0.00	0.00	0.00
October	4.28	0.50	0.04	4.32	3.57	0.30	0	4.03	0.00	4.03	4.03	4.03
November	4.14	1.76	0.15	4.29	2.19	0.18	0	4.11	0.00	8.14	8.14	8.14
December	4.28	2.91	0.24	4.53	1.67	0.14	0	4.39	0.00	12.53	12.52	12.52
Total	50.42	18.21	1.52	51.94	48.68	4.06	225.00	-177.11	189.64	---	---	---

A - Based on the plant capacity and 10 percent loss in process and in internal consumption
B - Monthly averages from 1931 through 2003
C - Data from C.I.M.I.S.; based on the evaporative losses from storage pond

Daily Storage Requirements**.** Daily storage is not a factor for the system. The seasonal storage volume will far exceed the need for daily volume. Daily/diurnal storage volume will be accounted for in the 20,000 gallon equalization storage tank within the plant process train.

Water Balance and Seasonal Storage Requirements. Seasonal storage is required to account for the annual variations between effluent supply, potable use for irrigation, irrigation demand, evaporation, and evapo-transpiration. The scenarios can be summarized as follows:

- In the summer, demand exceeds supply. The water from the plant will be supplied directly to a storage pond on-site where the water level will vary.
- In the winter, demand will infrequently exceed supply however, most of the time supply will exceed demand.
- Quantitatively, a month by month assessment of the supply and demand, accounting for vineyard crop irrigation, other landscape irrigation, and the effects of average rainfall and evaporation from the storage pond.
- For an analysis of storage requirements and to prepare a mass balance of treatment plant effluent, rainfall (on the vineyard area), evaporation from the storage pond surface, and irrigation for the vineyard, these assumptions were used:

- The required total duty factor for the vineyard, in addition to rainfall, is 0.75 feet per year which results in 225 AF/year on a 300-acre vineyard
- The monthly allocation of the presumed 225 AF/year will be distributed from March through September with the emphasis on the summer months
- The rainfall will be only accounted for in the mass balance in the amount of rainfall that contributes directly to the storage pond
- Evaporation from the storage pond will also be accounted for the in the mass balance
- The supply of available non-potable water will be the sum of effluent plus rainfall (pond only) minus evaporation (pond only)

The data presentation in Table 3-9 illustrates several key results of the analysis:

- The net annual balance is a deficit (the total irrigation for the vineyard, at 225 AF/year exceeds the production of effluent and the net loss of evaporation from rainfall incident to the storage pond)
- The precise net balance will vary slightly depending on how large the surface are for the pond is chosen to be
- The duty factor of 0.75 Feet per year for irrigation was chosen neglecting the rainfall that occurs during the winter months and is directly applicable to the vineyard; if this assumption is altered and the rainfall is accounted for, and then the effluent could be available for irrigation of other areas. For this to occur, rainfall harvesting and capture would be required
- Storage volume would merely be 5 AF

- Each month the vineyard requires irrigation, most of the water would come from sources other than effluent

RECYCLED WATER QUALITY

The chemical make-up of water used for irrigation purposes is very important in ensuring maintenance of the quality of the landscaping and crops being irrigated. Key water quality parameters from an agronomic aspect are described in this section.

Sodium, Sodium Adsorption Ratio (SAR), and Adjusted SAR (aSAR)

Sodium is not an essential plant nutrient, yet it is always present in the irrigation waters and it can become the most important single constituent in the water if it exceeds tolerable concentrations. Acceptable levels of sodium are judged in proportion to divalent cations, principally calcium and magnesium in the water. The criteria commonly used to determine the potential effect of this critical element are sodium adsorption ratio (SAR) and adjusted SAR. Adjusted SAR accounts for the presence of carbonates and bicarbonates in the irrigation water, because of their tendency to precipitate calcium from the solution, aggravating the effect of sodium. The most widely accepted method of adjusting the SAR is the so-called Cax method, wherein the ratio of bicarbonate to calcium is used to determine the adjustment factor. Long-term use of irrigation water with high SAR can result in gradual elevation of soil solution SAR and deleterious effects on soil structure, leading to progressively reduced soil permeability, water-logging, and anaerobic (oxygen deficient) conditions in the root zone.

Calcium

Calcium is essential for all plant life. It is almost always available in abundance in the soil, as far as plant nutrition requirements are concerned. However, calcium also plays another important role in the soil solution. It can balance the adverse impacts of sodium on soil physical structure and the soil's ability to transport water. Native soils in California are generally rich in calcium compounds.

Chloride

Chloride is also essential to plant life, but sufficient in extremely low concentrations. This element is almost never deficient in the environment. Excessive concentrations of chloride (beyond 140 mg/L) can be harmful due to toxicity to the plant tissues.

Dissolved Solids, Specific Conductance

Total dissolved solids (TDS) is a direct measure of salinity in the irrigation water. An indirect index of salinity is the electrical conductance (EC, inverse of electrical resistance) of the water sample. Elevated TDS concentrations of irrigation water can cause deleterious effects to plant growth and to soil conditions and characteristics.

Boron

Boron is an essential nutrient for plant germination and growth. However, beyond a narrow band of concentrations (0.1 to 5 mg/L), it becomes toxic to plant life. Boron is not highly mobile and cannot be easily flushed out of the root zone; however, boron can be taken up by the plant roots to the leaf tips. Thus, for turf grasses, where frequent mowing generally occurs, removal of boron can be effective

Chumash Camp 4 Project Recycled Water Quality

Projected irrigation water quality for the Chumash Camp 4 Project cannot be provided, since there is not an existing WWTP from which to take samples. In addition, Boron was not analyzed as part of the water quality results presented in Table 2-6. However, based on the total dissolved solids (TDS) concentration of the local water wells, mineral quality of the recycled water is anticipated to be 700 to 800 mg/L. Table 3-10 provides a general summary of the various water quality parameters relative to their degree of restriction on use for irrigation.

Table 3-10. Guidelines for Irrigation Water Quality Impacts

Parameter	Degree of Restriction on Use		
	None	Slight to Moderate	Severe
Boron, mg/L	<0.7	0.7-1.0	>3.0
Chloride, mg/L	<140	140-350	>350
TDS, mg/L	<450	450-2,000	>2,000
EC, mmhos/cm	<0.7	0.7-3.0	>3.0
SAR = 0-3, and EC (mmhos) =	>0.7	0.7-0.2	>0.2
SAR = 3-6, and EC (mmhos) =	>1.2	1.2-0.3	<0.3
SAR = 6-12, and EC (mmhos) =	>1.9	1.9-0.5	<0.5
SAR = 12-20, and EC (mmhos) =	>2.9	2.9-1.3	<1.3
SAR = 20-40, and EC (mmhos) =	>5.0	5.0-2.9	<2.9

Based on the anticipated water quality of the Chumash Camp 4 recycled water, the recycled water is generally suitable for landscape and irrigation uses for the Project. Based on the water balance, during the warmer season, potable water will also be supplementing the recycled water. The anticipated blend of potable water and recycled water for irrigation use should maintain the mineral quality at a desirable value, in the range of 600 to 700 mg/L. Irrigation with this recycled water is expected to yield good results.

WASTEWATER COLLECTION, TREATMENT, AND DISPOSAL SUMMARY

There are two alternative possible collection systems, depending on whether the decision is made to create 143 five-acre residential lots or to create 143 one-acre residential lots. The result of that decision will affect the layout and dimensions of the collection system. The collection system, regardless of which of these two choices is made, will be greatly affected by the dendritic topography. The topography will cause the landforms to be partially re-shaped in order to control the costs of both roadways and of sewer collection pipelines. There will be

pumping stations regardless of the choice made. The number of pumping stations will be determined both by the choice of the two alternatives discussed in this section and in final grading plans which are not part of this section's discussion.

The treatment system will occupy a relatively small footprint (less than an acre) allowing for the treatment process units and a small building to house both some mechanical equipment, an electrical and control room, and an operators station for conducting routine administrative duties and some laboratory testing. The photograph at right shows an example of a small MSABP treatment process module.

The example module illustrates the position of an influent screening unit (to the right and above the module) and the blowers (to the left and on grade). The process can be either above grade, as shown, or below grade. Not shown in this picture are the other process units such as the clarifier, sludge holding, and any tertiary of disinfection.

The effluent storage proposed is a deeply excavated basin that would allow the water to draw and fill without ever completely evacuating the basin. The concept is to fill the basin during cooler, winter months when the vineyard lies dormant and un-irrigated. The spring growth in the vineyard would signal the start of irrigation and would use the stored effluent from the pond as needed and as available. The 50,000 gpd treatment plant does not generate enough effluent and thus the pond is not adequate to meet the needs of a 300-acre vineyard. Potable water will be an important source of supply once the irrigation begins. Thus, it is proposed that a potable water make-up pipeline with air-gap separation, be provided to fill and supplement the storage reservoir when irrigation demand exceeds supply and stored irrigation water supply. During the summer months, it is important for the pond to retain at least five feet of depth for the water to sustain a biological balance in aquatic plant and animal life. If the pond is NOT sustained biologically, it will eventually become more of a nuisance than a benefit.

The water would be pumped from the pond, through a filtered drip system that operates on a schedule controlled by the vineyard operator using the knowledge and understanding required of a viticulturist. An important fact to remember about recycling water is that as soon as the effluent is produced and stored in a downstream system, the effects of nature begin to modify its chemistry and biology – and that means the effort to control the water's quality does not end until it has been applied to the final use.

Wastewater Operator Considerations

A tertiary wastewater facility of this size and complexity will require a Grade III operator, similar to that of the wastewater facility currently serving the Chumash Reservation in Santa Ynez. It is envisioned that a new WWTP for this Project would be operated under the same arrangements as the Chumash Reservation WWTP, being operated under contract by a qualified public agency operator (Santa Ynez CSD) or equivalent.

REFERENCES

Ahlroth, J.,2001, Lompoc Groundwater Basin: Update of Long-term Storage Changes and Overdraft Status, Santa Barbara County Water Agency Memorandum.

Analytical Environmental Services (AES), July 2004, Phase I Environmental Site Assessment, Parker Property, prepared for the Santa Ynez Band of Chumash Indians, Santa Ynez, California

California Department of Water Resources (DWR). 1980, updated 2003, California's Groundwater, Bulletin 118

Dibblee, T.W. Jr., 1993, Geologic Map of the Los Olivos Quadrangle, Santa Barbara County, California, Dibblee Geological Foundation Map #DF-44

Dibblee, T.W. Jr., 1988, Geologic Map of the Santa Ynez and Tajiguas Quadrangles, Santa Barbara County, California, Dibblee Geological Foundation Map #DF-15

Guptill, P.D., Heath, E.G., and Brogan, G.E., 1981, Surface Fault Traces and Historical Earthquake Effects near Los Alamos Valley, Santa Barbara County California, Woodward-Clyde Consultants, U.S.G.S. Open File No. 81-271

LaFreniere, G.F. and French, J.J., 1968, Ground-Water Resources of the Santa Ynez Upland Ground Water Basin, Santa Barbara County California, U.S. Geologic Survey

Questa Engineering Corporation, 2003, Septic System Sanitary Survey for Santa Barbara County

Santa Barbara County Public Works Department Water Resources Division Water Agency, May 2012, 2011 Santa Barbara County Groundwater Report, prepared by Dennis Gibbs

Santa Barbara County, Office of Long Range Planning, with Rincon Consultants, Inc., September, 2009, Santa Ynez Valley Community Plan Final Environmental Impact Report, Santa Barbara County, California

Santa Barbara County, Office of Long Range Planning, October 6, 2009, Santa Ynez Valley Community Plan.

Santa Barbara County, Office of Long Range Planning, September 2007, Agricultural Preserve and Farmland Security Zone Uniform Rules Update Project, Final Environmental Impact Report, SCH#2004081158.

Upson, J.E. and Thomason, H.G., 1951, Geology and Water Resources of the Santa Ynez River Basin, Santa Barbara County, California, U.S. Geological Survey Water-Water Supply Paper 1107

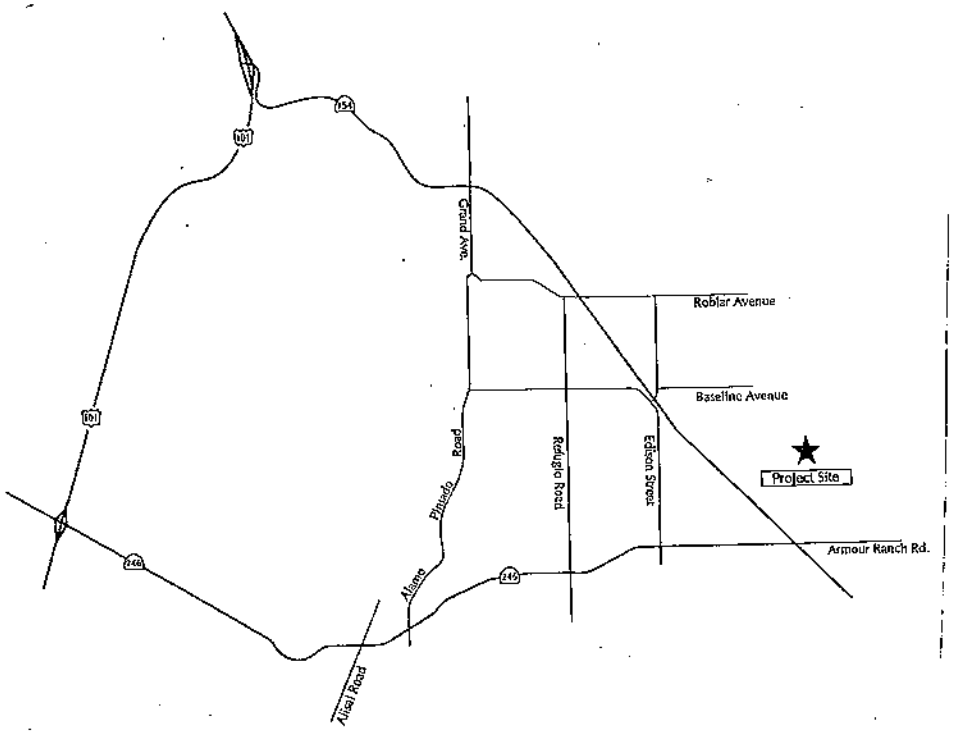
U.S. Department of Agriculture, Natural Resources Conservation Service, Custom Soil Resource Report for Northern Santa Barbara Area, California, survey data from August 2009, aerial photography June 2005.

APPENDIX I

TRAFFIC IMPACT STUDY (REVISED)

CHUMASH CAMP 4 RESIDENTIAL FEE-TO-TRUST PROJECT
SANTA YNEZ, CALIFORNIA

REVISED TRAFFIC IMPACT STUDY



April 3, 2014

ATE #12018

Prepared For:

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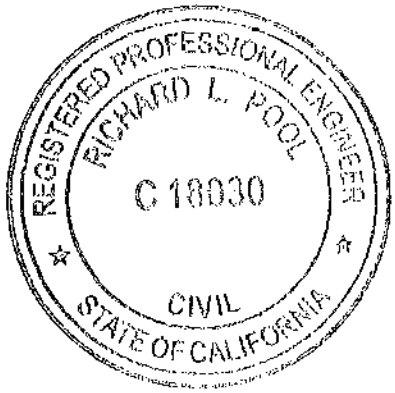
REVISED TRAFFIC IMPACT STUDY FOR THE CHUMASH CAMP 4 RESIDENTIAL FEE-TO-TRUST PROJECT, SANTA YNEZ, CALIFORNIA

Associated Transportation Engineers (ATE) has prepared the following traffic impact study for the Chumash Camp 4 Residential Fee-to-Trust Project. The study addresses potential traffic and circulation impacts associated with the project and identifies improvements where appropriate. It is understood that the results of the traffic impact study will be incorporated into the Environmental Assessment being prepared by Analytical Environmental Services.

Associated Transportation Engineers

Richard L. Pool, PE
President



CONTENTS

TABLES

FIGURES

INTRODUCTION

The following report presents the results of the traffic impact study prepared by Associated Transportation Engineers (ATE) for the Chumash Camp 4 Residential Fee-To-Trust Project (the "Project"). The report provides information regarding existing and future traffic conditions within the project study-area and recommends improvements where necessary. The report also contains an analysis of the access and circulation plan proposed for the Project.

PROJECT DESCRIPTION

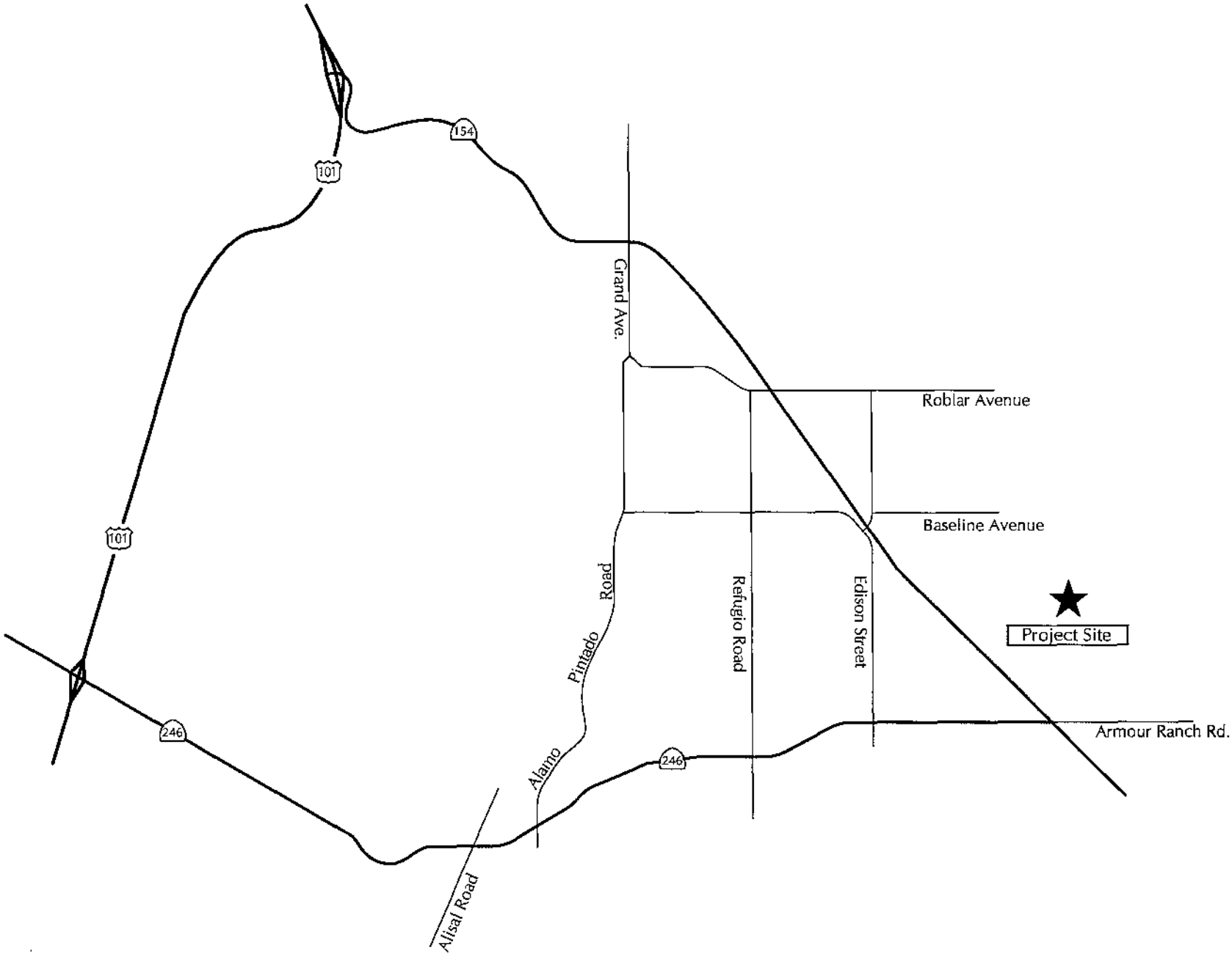
The Project is proposing a fee-to-trust land acquisition for the proposed ±1,433-acre site to allow for development of residential housing for Chumash tribe members. The site is located northeast of the SR 154/SR 246 intersection in the Santa Ynez area of Santa Barbara County (see Figure 1 - Project Site Location). Two alternatives have been developed for the site, both of which are analyzed in this traffic study. Alternative A includes 143 five-acres lots for single family dwelling units (see Figure 2 - Alternative A Site Plan). Alternative B includes 143 one-acres lots for single family dwelling units plus a 12,042 square-foot tribal hall facility (see Figure 3 - Alternative B Site Plan). The tribal hall facility would include a meeting hall and office space for use by the Chumash tribe. No gaming would occur on the subject property. Access for the Project (both alternatives) is proposed via 2 connections to Baseline Avenue and 1 connection to Armour Ranch Road (see Figures 2 and 3).

SCOPE OF WORK AND STUDY METHODOLOGY

Scoping Process. Teleconference calls were held between AES/ATE/Caltrans and AES/ATE/Santa Barbara County to discuss the Project and the traffic study requirements. The scope of work for the traffic study was then developed by ATE. The scope of work is outlined below.

Traffic Scenarios. Traffic operations are analyzed for the following scenarios:

1) Existing Conditions (2012)
2) Near-Term Conditions (2014 without the Project)
3) Near-Term + Project Conditions (2014 with the Project)
4) Cumulative Conditions (2030 without the Project)
5) Cumulative + Project Conditions (2030 with the Project)



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PROJECT SITE LOCATION/EXISTING STREET NETWORK

FIGURE 1

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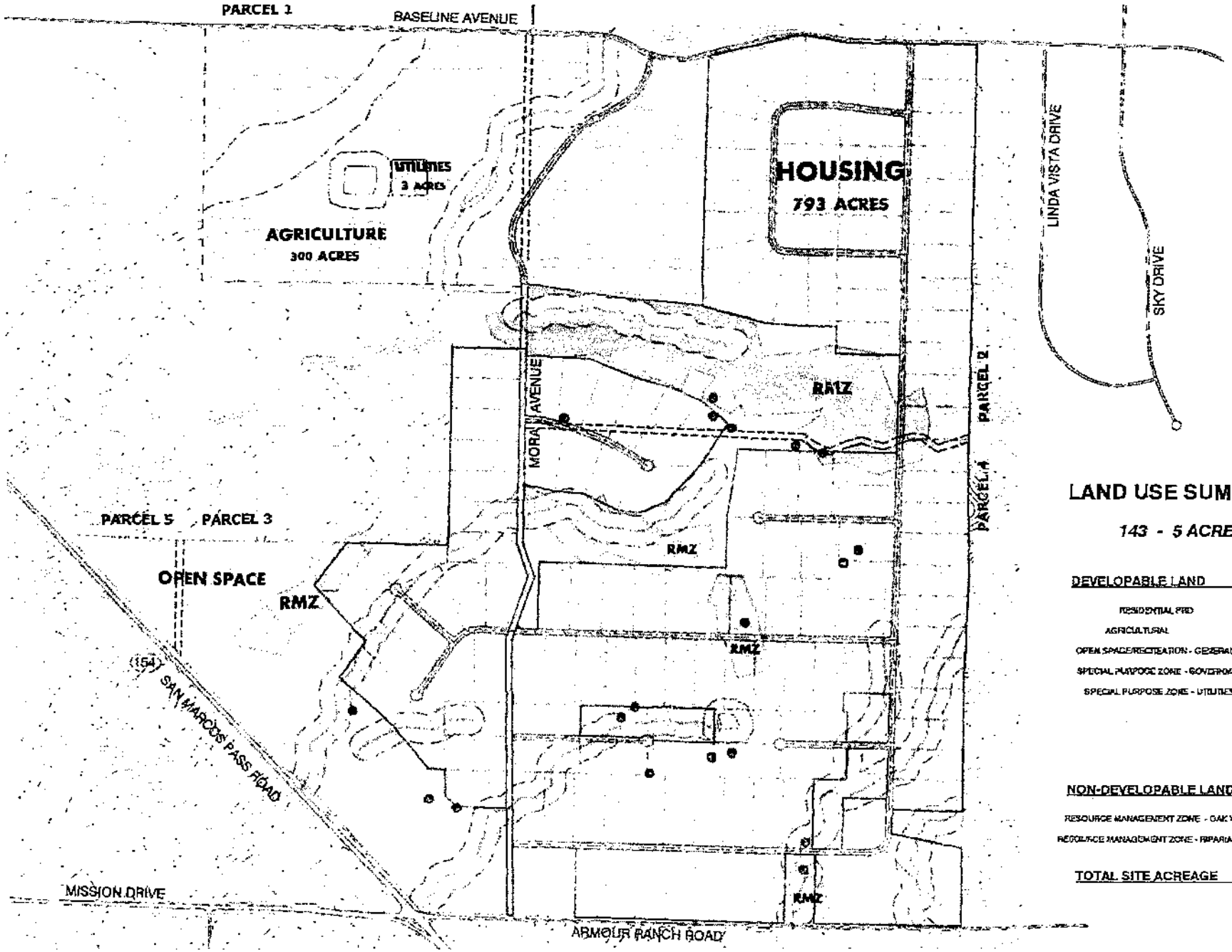

LAND USE SUMMARY

143 - 5 ACRE LOTS

DEVELOPABLE LAND	1,302 ACRES
RESIDENTIAL PRD	793 ACRES
AGRICULTURAL	300 ACRES
OPEN SPACE/RECREATION - GENERAL/TRAILS	206 ACRES
SPECIAL PURPOSE ZONE - GOVERNMENT	00 ACRES
SPECIAL PURPOSE ZONE - UTILITIES	3 ACRES

NON-DEVELOPABLE LAND	131 ACRES
RESOURCE MANAGEMENT ZONE - OAK WOODLAND	23 ACRES
RESOURCE MANAGEMENT ZONE - RIPARIAN CORRIDORS	98 ACRES

TOTAL SITE ACREAGE 1,433 ACRES

Associated
Transportation
Engineers

ALTERNATIVE A SITE PLAN

FIGURE 2

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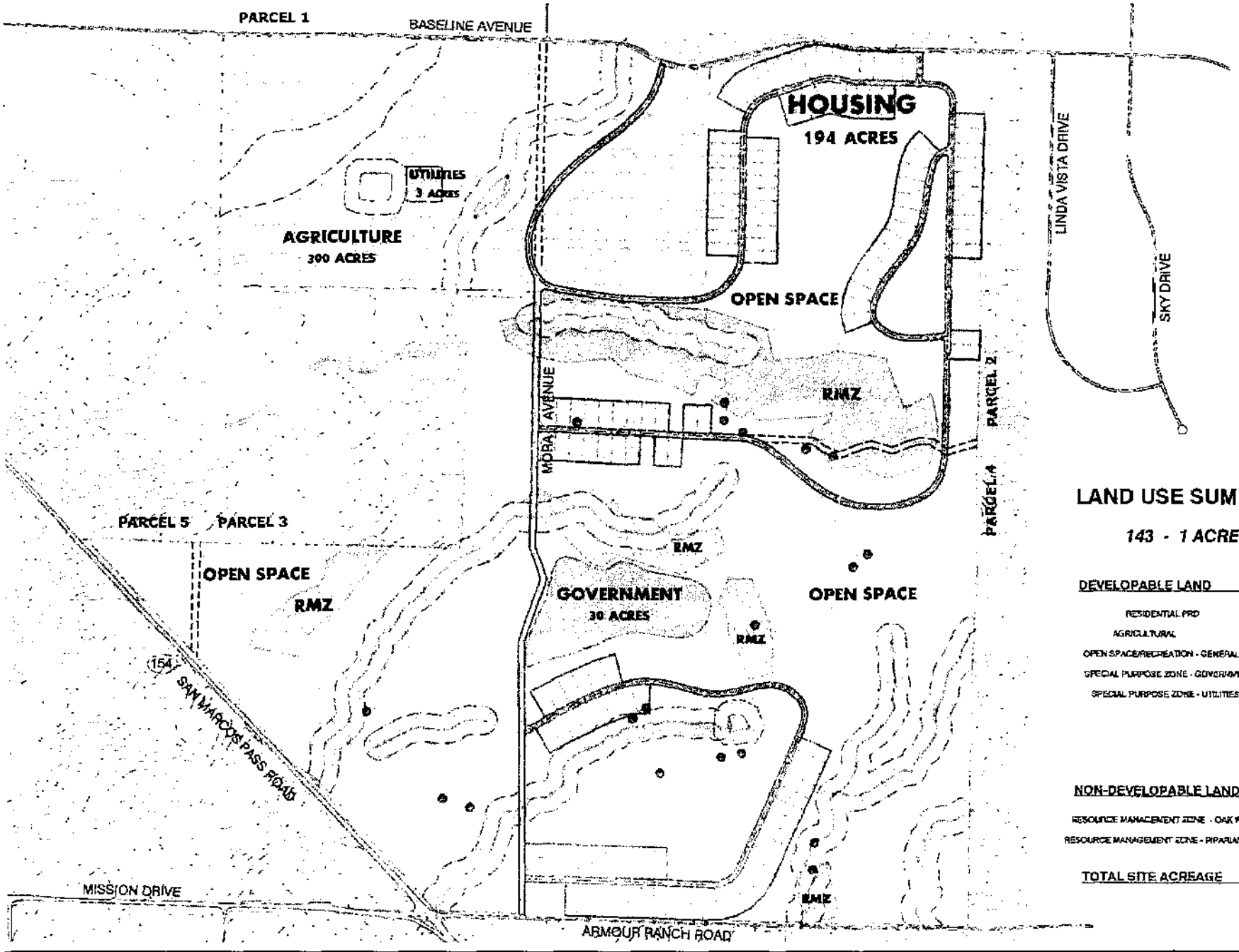


LAND USE SUMMARY

143 - 1 ACRE LOTS

DEVELOPABLE LAND	1,302 ACRES
RESIDENTIAL PRD	194 ACRES
AGRICULTURAL	300 ACRES
OPEN SPACE/RECREATION - GENERAL/TRAILS	775 ACRES
SPECIAL PURPOSE ZONE - GOVERNMENT	30 ACRES
SPECIAL PURPOSE ZONE - UTILITIES	3 ACRES

NON-DEVELOPABLE LAND	131 ACRES
RESOURCE MANAGEMENT ZONE - OAK WOODLAND	33 ACRES
RESOURCE MANAGEMENT ZONE - RIPARIAN CORRIDORS	98 ACRES

TOTAL SITE ACREAGE 1,433 ACRES

ASSOCIATED TRANSPORTATION ENGINEERS

ALTERNATIVE B SITE PLAN

FIGURE 3

MMF - #12018.02

Study-Area Facilities. The key roadways and intersections included in the traffic study were identified based on the level of traffic that would be generated by the Project and the location of the Project's access connections to the surrounding roadway network. Both local and regional facilities are analyzed in the study since traffic generated by the Project would use both County roads and State Highways. The roadways and intersections included in the study are listed in Table 1.

Table 1
Study-Area Roadways and Intersections

County Roadway Segments	State Highway Segments	State Highway Intersections
Baseline Ave east of Edison St	SR 154 north of Edison St	SR 154/U.S. 101 SB
Armour Ranch Rd east of SR 154	SR 154 south of SR 246	SR 154/U.S. 101 NB
	SR 246 west of SR 154	SR 154/Grand Ave
		SR 154/Roblar Ave
		SR 154/Edison St
		SR 246/Alisal Rd
		SR 246/Alamo Pintado Rd
		SR 246/Refugio Rd
		SR 246/Edison St
		SR 246/SR 154

Existing Traffic Volumes. Counts were collected in March 2012 for the key roadway segments and intersections where existing data is no longer representative of Existing conditions (traffic counts collected for this study are contained in the Technical Appendix for reference). "Average Daily Traffic" volumes represent traffic that travels on a specific roadway segment over an average 24-hour period. Average Daily Traffic (ADT) volumes were collected on the key roadway segments using machine traffic counters. Because traffic flow on a roadway network is most constrained at intersections, detailed traffic analyses also examine the operations at key intersections during peak travel periods. Turning movements were counted at the study-area intersections from 7:00 to 9:00 A.M. and from 4:00 to 6:00 P.M. The one-hour period containing the highest volume of traffic is considered the peak hour.

Future Traffic Forecasts. Near-Term traffic conditions (2014 without the Project) were forecast using a list of approved and pending projects located within the Santa Ynez Valley planning area. Cumulative traffic conditions (2030 without the Project) were taken from the traffic study prepared for the Santa Ynez Valley Community Plan EIR.[1] The 20-Year Buildout

[1] Traffic and Circulation Study for the Santa Ynez Valley Community Plan, Associated Transportation Engineers, April 2008.

forecasts contained in the Santa Ynez Valley Community Plan were used for the analysis. The 20-Year forecasts are based on 20-year buildout land uses provided by the County for the Santa Ynez Valley area, growth within the adjacent cities of Buellton and Solvang, plus cumulative growth from outside of the Santa Ynez Valley.

LEVEL OF SERVICE STANDARDS

The following level of service standards have been adopted for the street network that serves the Project. For reference, "Levels of Service" (LOS) A through F are used to rate traffic operations. Generally, LOS A indicates free flow operations with no delays; LOS B indicates stable flow with very little delay; LOS C indicates stable flow with low to moderate delays; LOS D indicates flows approaching unstable conditions with moderate to heavy delays; LOS E indicates unstable flow with significant delays; and LOS F indicates forced flow conditions resulting from volumes that are well above capacity.

Santa Barbara County Level of Service Standards

Armour Ranch Road and Baseline Avenue fall under the jurisdiction of Santa Barbara County. Through adoption of the Santa Ynez Valley Community Plan, the County adopted LOS B as the minimum standard for traffic operations for Armour Ranch Road and Baseline Avenue.

Caltrans Level of Service Standards

SR 154 and SR 246 fall under the jurisdiction of Caltrans. Caltrans District 5 established level of service goals for State Route 154 and State Route 246 in their Transportation Concept Reports.[2] The Transportation Concept Reports show LOS D as the minimum operating standard for both SR 154 and SR 246.

EXISTING CONDITIONS

Street Network

The principal components of the roadway network within the vicinity of the Project site are illustrated in Figure 1 and discussed below.

[2] Transportation Concept Report State Route 154, California Department of Transportation District 5, February 2007. Transportation Concept Report State Route 246, California Department of Transportation District 5, May 2004.

U.S. Highway 101 is a four-lane freeway that serves as the major north-south link through Santa Barbara County and is the principal inter-city route along the Pacific Coast. The highway provides the principal connection between the Santa Ynez Valley and Santa Maria and San Luis Obispo to the north; and the Santa Barbara-Goleta area to the south.

SR 154 is a two-lane California state highway that provides regional access to the Santa Ynez Valley. SR 154 extends from U.S. Highway 101 north of the Los Olivos Township through the Santa Ynez Valley to the Santa Barbara-Goleta area to the south. SR 154 is divided by a double yellow centerline with passing lanes provided intermittently.

SR 246 is a two-lane California state highway that also provides regional access to the Santa Ynez Valley. SR 154 extends in an east-west direction within the Santa Ynez Valley area between SR 154 on the east and U.S. Highway 101 on the west. SR 246 is the major east-west route within the Santa Ynez Valley and is used by a significant number of local drivers as an intra-community route within the valley.

Edison Street is a two-lane County roadway that extends in a north-south direction on the east and west sides of SR 154.

Baseline Avenue is a two-lane County roadway that extends in an east-west direction on the east and west sides of SR 154. Baseline Avenue is classified as an S-3 roadway by the County.

Armour Ranch Road is a two-lane County roadway that extends east of SR 154. Armour Ranch Road is classified as an S-3 roadway by the County.

County Roadway Operations

Traffic operations were analyzed for the County roads (Baseline Avenue and Armour Ranch Road) by comparing the Existing traffic volumes to the "Acceptable Capacity" ratings adopted by the County. Table 2 shows the Existing traffic volumes and Acceptable Capacity ratings for the County roads. As shown, the County roadway segments carry volumes within their Acceptable Capacity ratings - indicating that they operate at LOS B or better - which meets the County's standards.

Table 2
Existing Operations - County Roadways

Roadway	Roadway Classification	Geometry	Existing ADT	Acceptable Capacity(a)
Baseline Avenue e/o Edison Street	County S-3	2 Lanes	1,600	5,530
Armour Ranch Road e/o SR 154	County S-3	2 Lanes	700	5,530

(a) Acceptable Capacity rating equates to County's LOS B standard adopted for the Santa Ynez area.

State Highway Operations

Operations for SR 154 and SR 246 were analyzed using the operations procedures outlined in the Highway Capacity Manual (HCM).[3] More specifically, operations for SR 154 were assessed using the HCM procedures for 2-lane highways since SR 154 is an uninterrupted flow highway. This method focuses on average travel speeds and the ability to pass for each direction of travel during the peak hour period. Operations for SR 246 between SR 154 and Solvang were assessed using the HCM procedures for signalized intersections since the flow of traffic is controlled by traffic signals on this segment of highway. This method focuses on average delays at each intersection during peak hour periods.

Figures 4 and 5 shows the Existing A.M. and P.M. peak hour traffic volumes used in the level of service analyses. Table 3 shows the Existing levels of service for the SR 154 segments north and south of the project site. Table 4 shows the Existing levels of service for the intersections along the SR 154 and SR 246 highway segments.

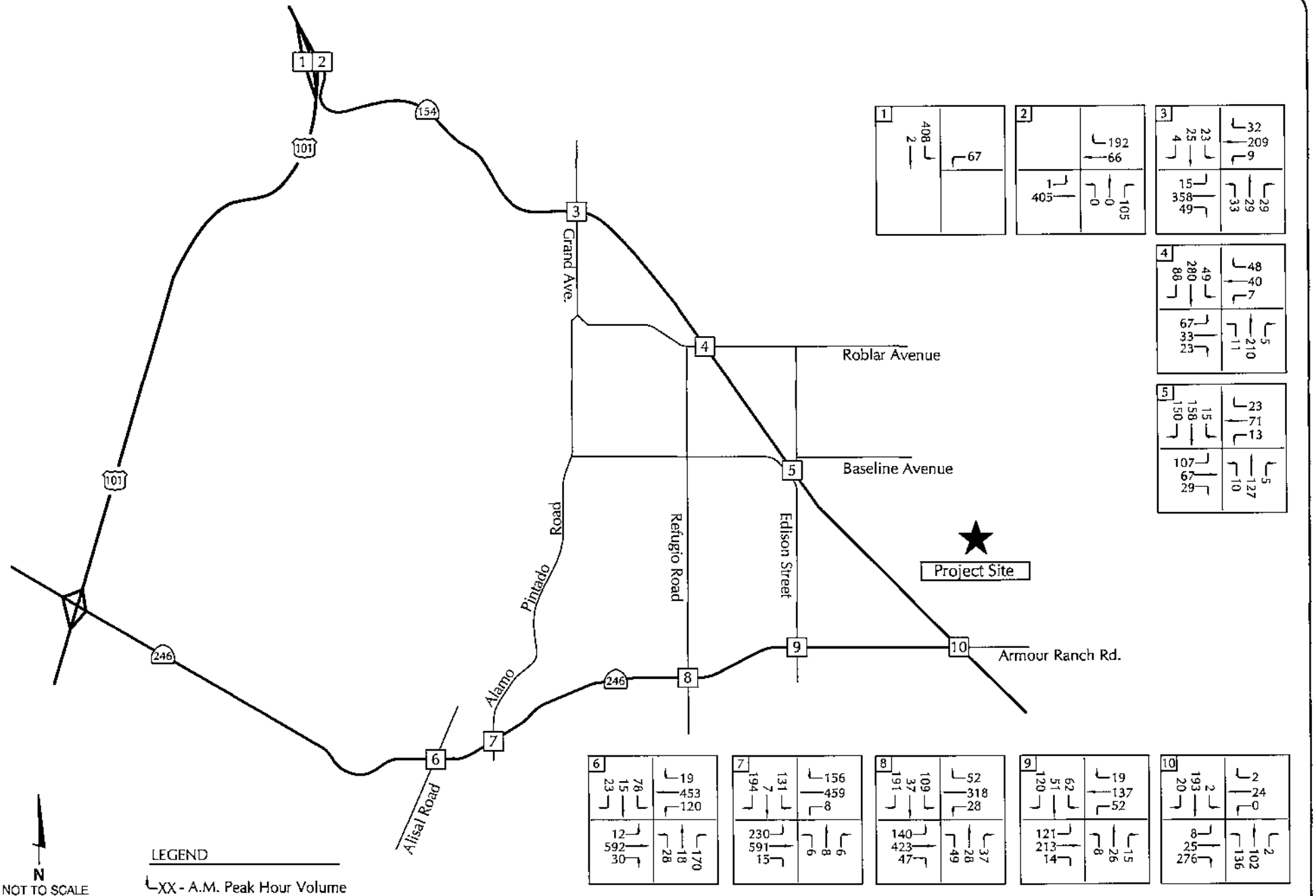
As shown in Table 3, both SR 154 and SR 246 operate at LOS D (or better) during the peak hour periods. As shown in Table 4, the intersections along SR 154 and SR 246 currently operate at LOS C or better during the A.M. and P.M. peak hours. The Existing conditions analysis shows that traffic operations along both SR 154 and SR 246 are within Caltrans' LOS D standard.

Table 3
Existing Operations - State Highway Segments

Highway Segment	Classification	Peak Hour LOS
SR 154 n/o Edison Street(a)	State Highway	LOS D/LOS C
SR 154 s/o SR 246-Armour Ranch Road(a)	State Highway	LOS D/LOS D
SR 246 from SR 154 to Solvang(b)	State Highway	LOS B-C

(a)Northbound/Southbound LOS based on travel speeds and ability to pass using P.M. peak hour flows.
(b)Signalized segment - LOS based on delays at intersections (See Table 4).

[3] 2010 Highway Capacity Manual, Transportation Research Board, 2010.



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EXISTING A.M. PEAK HOUR TRAFFIC VOLUMES

FIGURE 4

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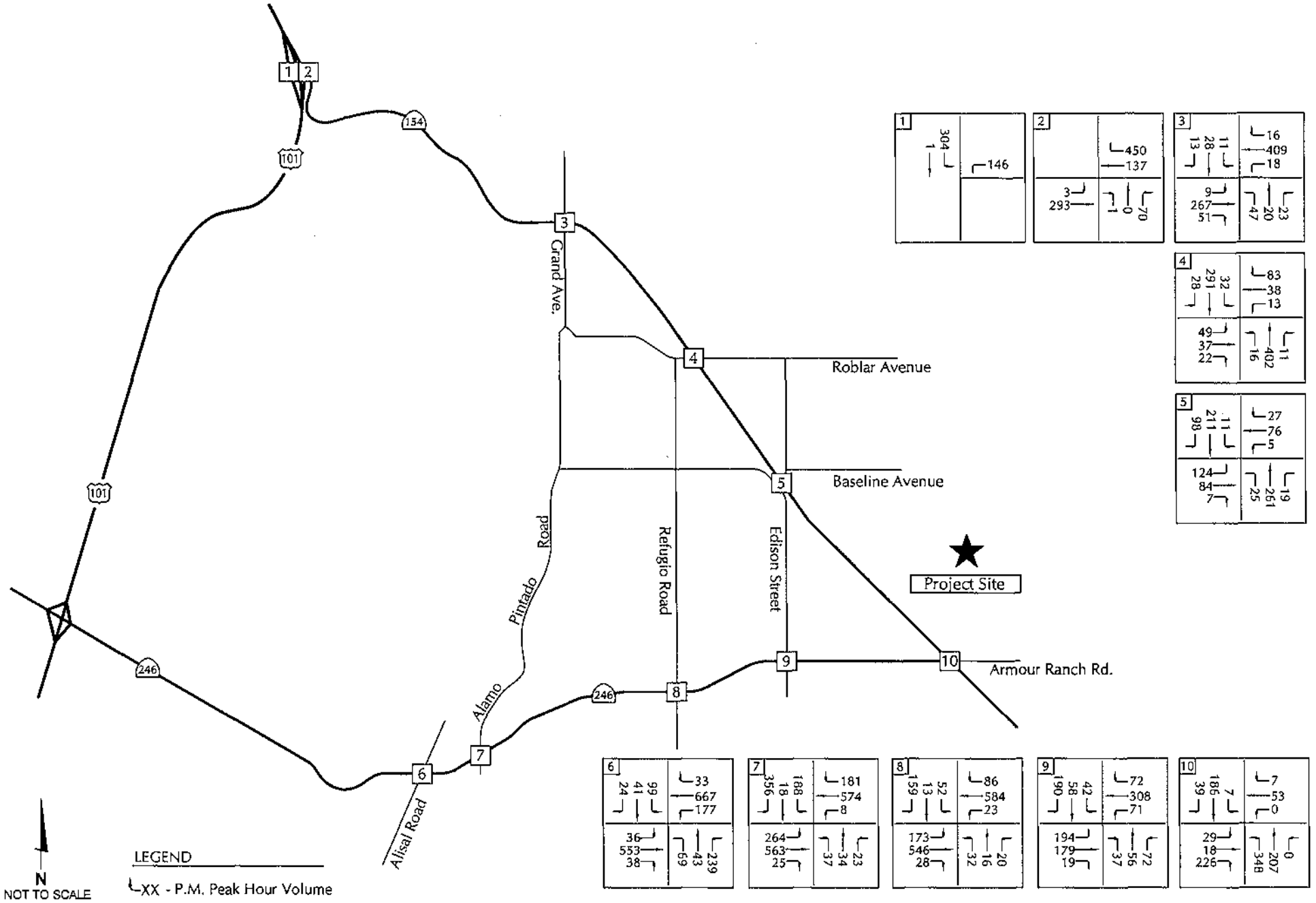

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EXISTING P.M. PEAK HOUR TRAFFIC VOLUMES

FIGURE 5

MMF - #12018.02

Table 4
Existing Operations - State Highway Intersections

Intersection	Control	Delay / LOS	
		A.M. Peak	P.M. Peak
SR 154/U.S. 101 SB	STOP Sign	11.2 Sec/LOS B	10.1 Sec/LOS B
SR 154/U.S. 101 NB	STOP Sign	11.7 Sec/LOS B	10.3 Sec/LOS B
SR 154/Grand Avenue	STOP Sign	14.6 Sec/LOS B	16.2 Sec/LOS C
SR 154/Roblar Avenue	STOP Sign	15.0 Sec/LOS B	17.6 Sec/LOS C
SR 154/Edison Street	STOP Sign	11.1 Sec/LOS B	13.2 Sec/LOS B
SR 246/Alisal Road	Signal	22.1 Sec/LOS C	21.6 Sec/LOS C
SR 246/Alamo Pintado Road	Signal	19.4 Sec/LOS B	22.8 Sec/LOS C
SR 246/Refugio Road	Signal	17.3 Sec/LOS B	26.8 Sec/LOS C
SR 246/Edison Street	Signal	16.7 Sec/LOS B	21.4 Sec/LOS C
SR 246/SR 154	STOP Sign	10.8 Sec/LOS B	14.7 Sec/LOS C

PROJECT-GENERATED TRAFFIC

Project Trip Generation

Trip generation estimates were developed for the Project using rates contained in the Institute of Transportation Engineers' (ITE) trip generation report.[4] The ITE rates for Single Family Detached Housing (ITE Land Use Code #210) was selected to develop the trip generation estimates for Alternative A. The ITE rates for Single Family Detached Housing (ITE Land Use Code #210) and Community Center (ITE Land Use Code #495) were selected to develop the trip generation estimates for Alternative B. Table 3 presents the trip generation estimates for Alternative A and Alternative B (the trip generation calculation worksheet is included in the Technical Appendix for reference).

As shown in Table 5, Alternative A is forecast to generate a 1,369 average daily trips, with 107 trips occurring during the A.M. peak hour and 144 trips occurring during the P.M. peak hour. Alternative B is forecast to generate a 1,645 average daily trips, with 127 trips occurring during the A.M. peak hour and 161 trips occurring during the P.M. peak hour.

[4] Trip Generation, Institute of Transportation Engineers, 8th Edition, 2008.

Table 5
Project Trip Generation

Alternative & Land Uses	Size	ADT		A.M. Peak Hour		P.M. Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
Alternative A							
Single Family Residential	143 Units	9.57	1,369	0.75	107	1.01	144
Alternative B							
Single Family Residential	143 Units	9.57	1,369	0.75	107	1.01	144
Tribal Hall	12,042 SF	22.88	276	1.62	20	1.45	17
Total			1,645		127		161

Trip rates per unit for Single Family Residential and per 1,000 SF for Tribal Hall.

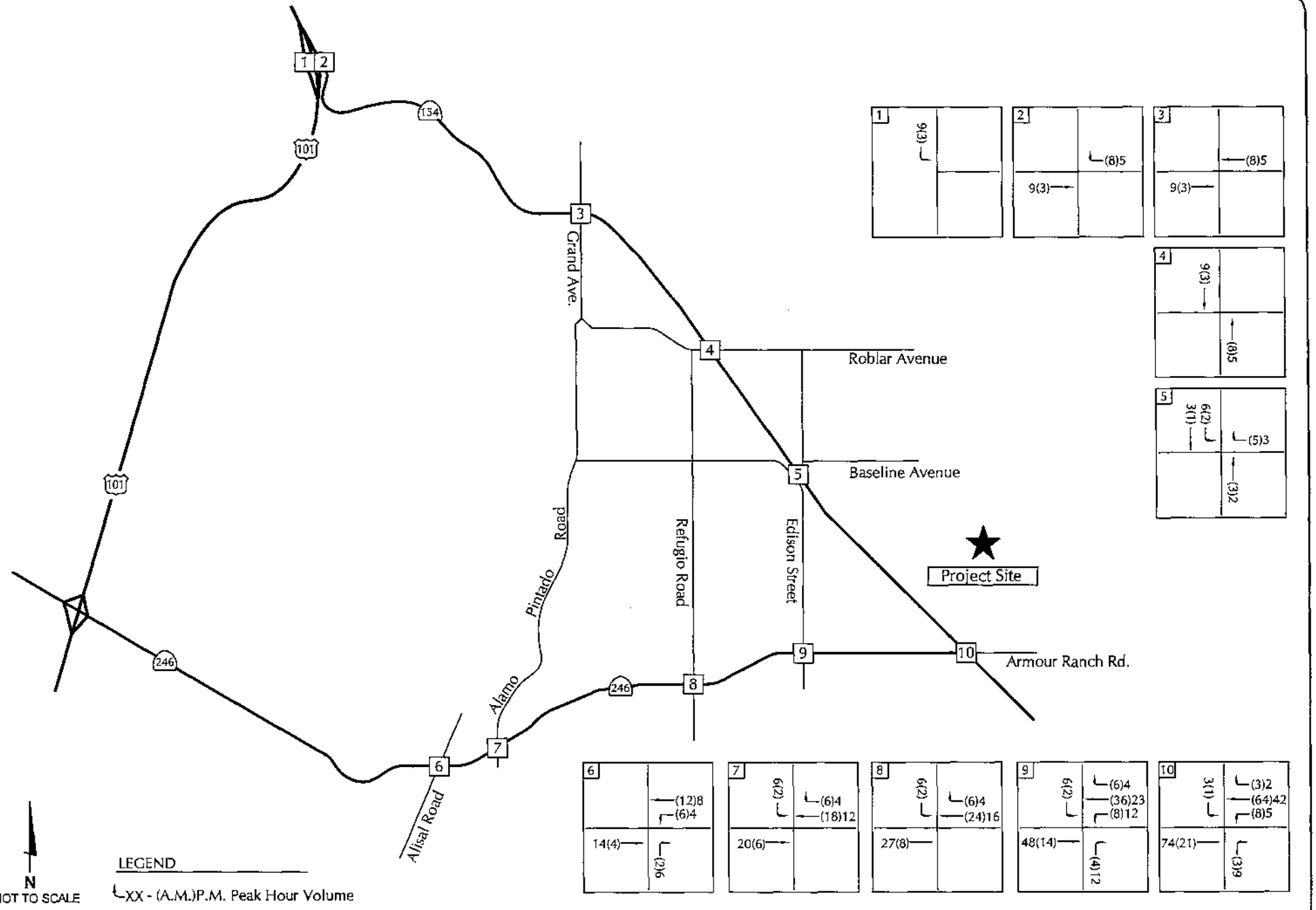
Project Trip Distribution & Assignment

Traffic generated by Alternative A and Alternative B was distributed to the study-area street network based on the trip distribution pattern shown in Table 6. The trip distribution pattern was developed by considering area population, surrounding land uses, existing traffic patterns and probable orientation of project trip types. Once distributed, the trips generated by the project were assigned to the key roadways and intersections within the study area. Figures 6 and 7 show the assignment of project-generated traffic for Alternative A and Alternative B.

Table 6
Project Trip Distribution

Origin/Destination	Directinn	Distribution %	
		Residential	Tribal Hall
U.S. 101 oorth of Los Olivos	North	10%	5%
SR 154 south of Santa Ynez	South	10%	5%
SR 246 west of Solvang	West	10%	5%
Santa Ynez Valley	West	70%	60%
Internal(a)	NA	0%	25%
Total			**100%**

(a) 25% of Community Center traffic is anticipated to be local trips within the Project site.



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TRIP DISTRIBUTION AND ASSIGNMENT - ALTERNATIVE A

FIGURE 6

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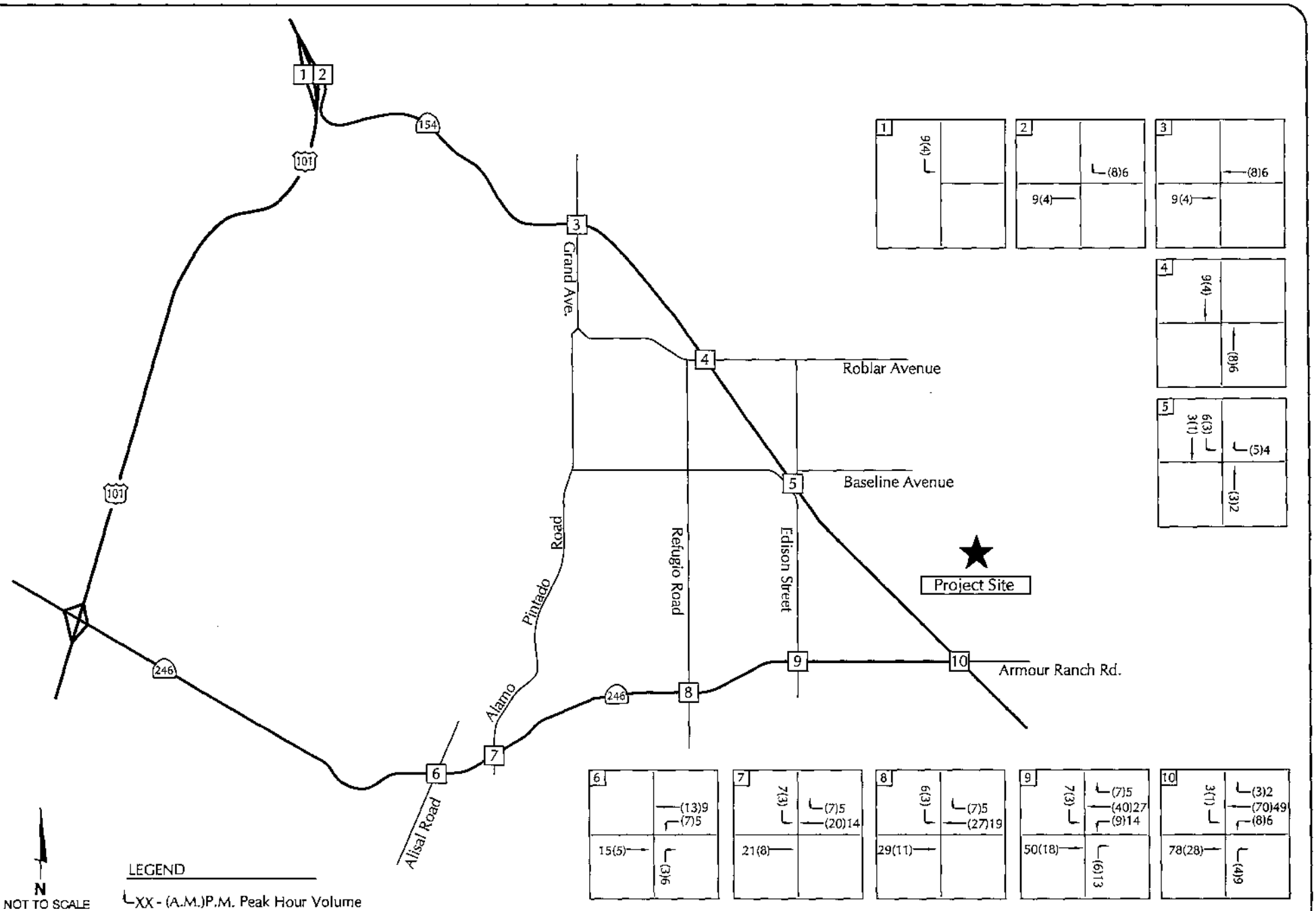

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TRIP DISTRIBUTION AND ASSIGNMENT - ALTERNATIVE B

FIGURE 7

MMF - #12018.02

NEAR-TERM CONDITIONS

Near-Term traffic conditions were forecast using a list of approved and pending projects located within the Santa Ynez planning area (the list of approved/pending projects is contained in the Technical Appendix for reference). ITE trip rates were used to estimate traffic generation for the approved/pending projects (a worksheet shown the trip generation calculations is contained in the Technical Appendix for reference). Figures 8 and 9 shows the Near-Term traffic volume forecasts. Levels of service for Near-Term Conditions are compared to Near-Term + Project Conditions in the following section.

NEAR-TERM + PROJECT CONDITIONS

Alternative A

Traffic that would be generated by Alternative A was added to the Near-Term traffic volume forecasts in order to assess potential impacts. Figures 10 and 11 show the Near-Term + Alternative A traffic forecasts.

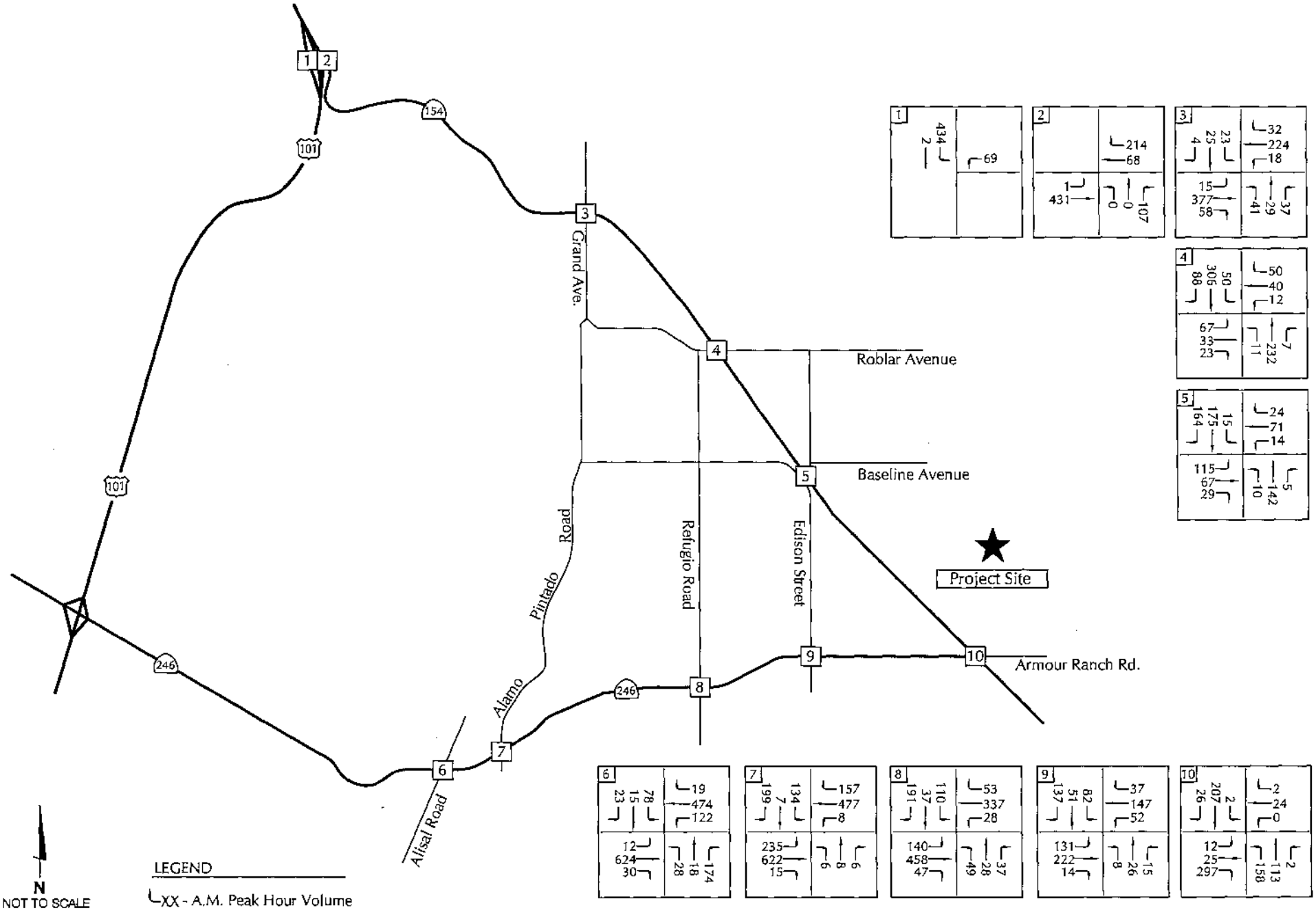
County Roadway Impacts. Near-Term Conditions and Near-Term + Alternative A forecasts for the County roadways adjacent to the Project site are shown in Table 7. As shown, the County roadway segments are forecast to carry volumes within their Acceptable Capacity ratings under Near-Term + Alternative A Conditions - indicating that they would operate at LOS B or better - which meets County's adopted standard. Thus, Alternative A would not significantly impact the County roadways adjacent to the Project site.

Table 7
Near-Term + Alternative A - County Roadway Operations

Roadway	ADT Volume			
	Near-Term	Project Added	Near-Term + Project	Acceptable Capacity(a)
Baseline Avenue e/o Edison Street	1,640	205	1,845	5,530
Armour Ranch Road e/o SR 154	700	1,164	1,864	5,530

(a) Acceptable Capacity rating equates to County's LOS B standard adopted for the Santa Ynez area.

State Highway Impacts. Near-Term and Near-Term + Alternative A level of service forecasts for SR 154 and SR 246 are shown in Tables 8 and 9. As shown in Table 8, the SR 154 highway segments are forecast to operate at LOS C-D under Near-Term and Near-Term + Alternative A conditions - which meets the Caltrans LOS D standard. Most of the key intersections along SR 246 are forecast to operate at LOS B or LOS C under Near-Term and Near-Term + Alternative A conditions (see Table 9).



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NEAR-TERM A.M. PEAK HOUR TRAFFIC VOLUMES

FIGURE 8

MMF - #12018.02

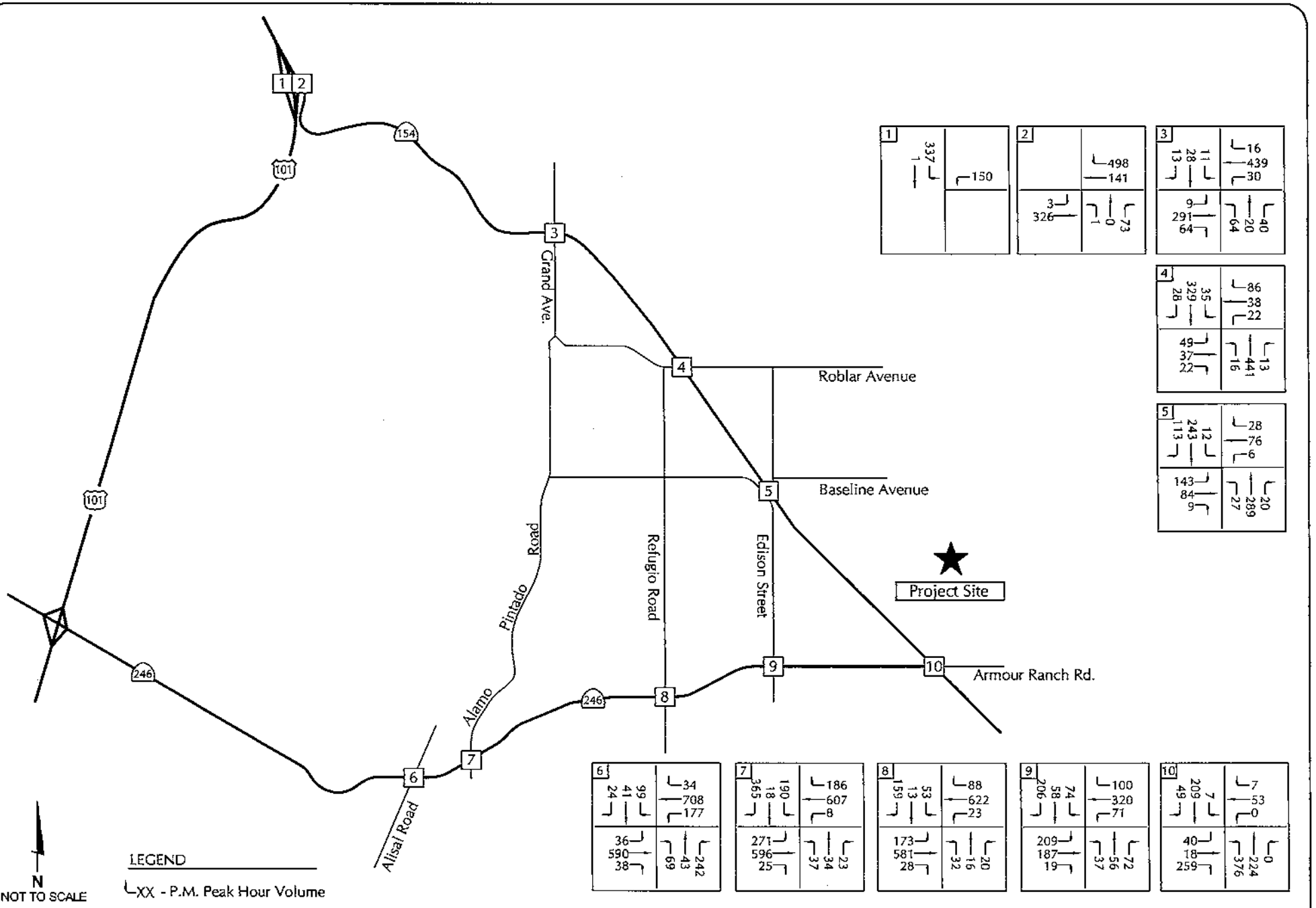

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FIGURE 9

NEAR-TERM P.M. PEAK HOUR TRAFFIC VOLUMES

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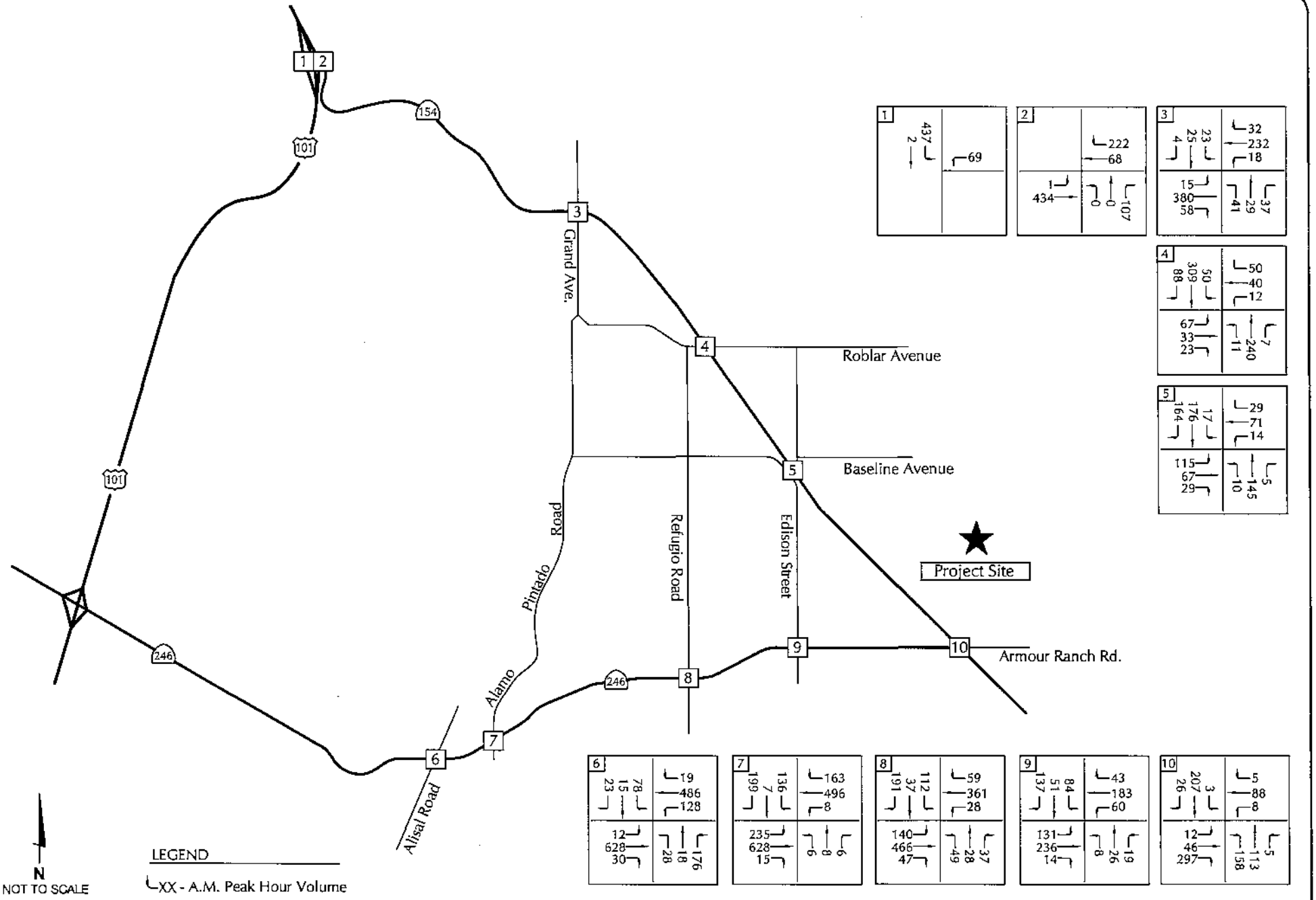

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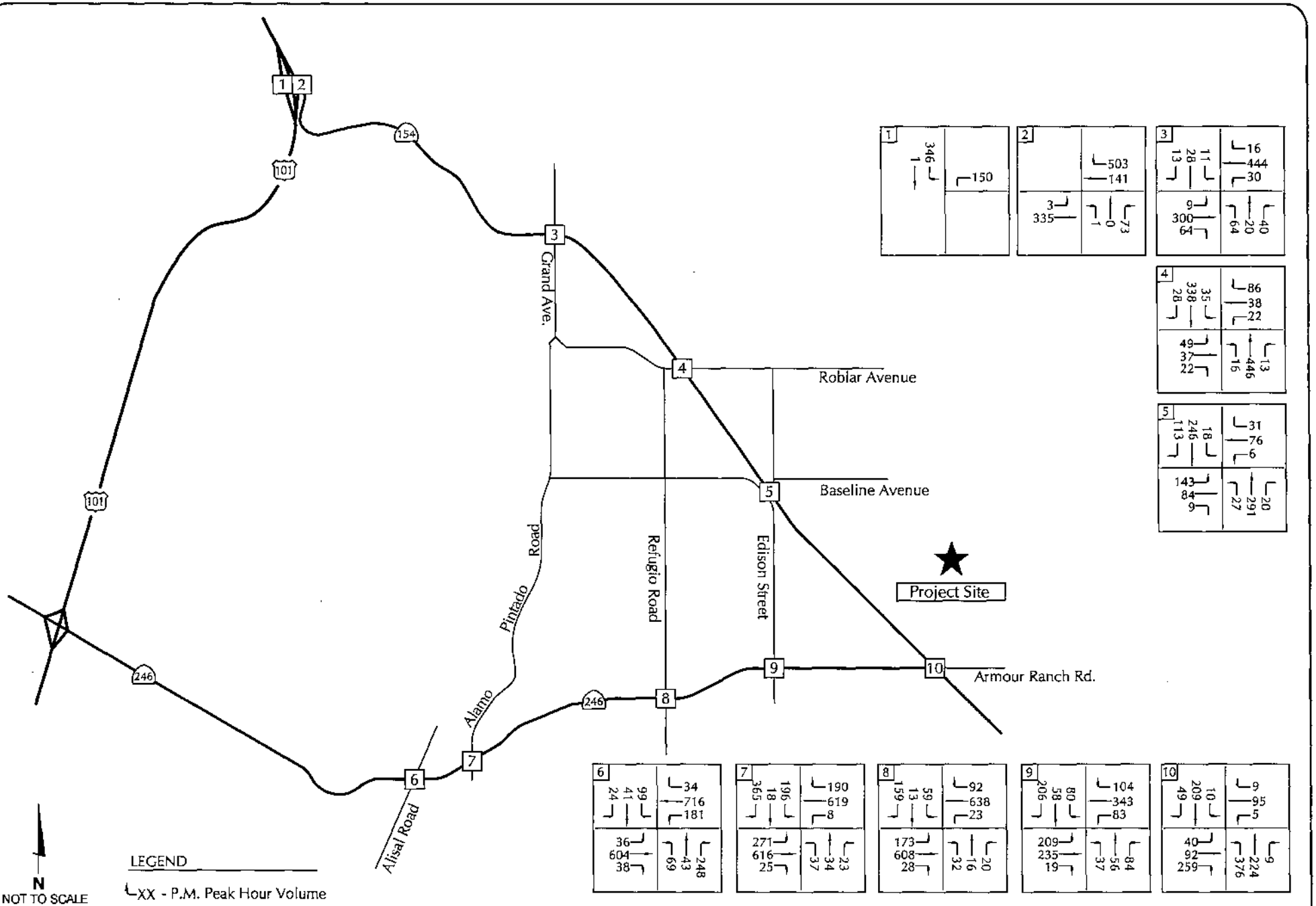
NEAR-TERM + PROJECT A.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE A

FIGURE 10

MMF - #12018.02



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NEAR-TERM + PROJECT P.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE A

FIGURE 11

MMF - #12018.02

As shown in Table 9, the SR 246/SR 154 intersection is forecast to degrade to LOS F during the P.M. peak hour period with the traffic that would added by Alternative A. The level of service analysis shows that there would not be a sufficient number of gaps in the SR 154 traffic stream for Alternative A traffic to cross SR 154 when traveling to/from the Project site. Improvements required to accommodate the Near-Term + Alternative A traffic forecasts are presented in the Mitigation Measures section of the report.

Table 8
Near-Term + Alternative A - State Highway Segment Operations

Highway Segment	Peak Hour LOS	
	Near-Term	Near-Term + Project
SR 154 n/o Edison Street(a)	LOS D/LOS C	LOS D/LOS C
SR 154 s/o SR 246-Armour Ranch Road(a)	LOS D/LOS C	LOS D/LOS D
SR 246 from SR 154 to Solvang(b)	LOS B-C	LOS B-C

(a) Northbound/Southbound LOS based on travel speeds and ability to pass using P.M. peak hour flows.
(b) Signalized segment - LOS based on delays at intersections (See Table 9).

Table 9
Near-Term + Alternative A - State Highway Intersection Operations

Intersection	Delay / LOS			
	Near-Term		Near-Term + Project	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
SR 154/U.S. 101 SB	11.8 Sec/LOS B	10.5 Sec/LOS B	11.8 Sec/LOS B	10.6 Sec/LOS B
SR 154/U.S. 101 NB	12.0 Sec/LOS B	10.6 Sec/LOS B	12.0 Sec/LOS B	10.7 Sec/LOS B
SR 154/Grand Ave	15.5 Sec/LOS C	18.5 Sec/LOS C	15.6 Sec/LOS C	18.8 Sec/LOS C
SR 154/Roblar Ave	16.1 Sec/LOS C	20.4 Sec/LOS C	16.5 Sec/LOS C	20.9 Sec/LOS C
SR 154/Edison Street	11.9 Sec/LOS B	15.4 Sec/LOS C	11.9 Sec/LOS B	15.6 Sec/LOS C
SR 246/Alisal Rd	19.5 Sec/LOS B	22.9 Sec/LOS C	21.1 Sec/LOS C	23.6 Sec/LOS C
SR 246/Alamo Pintado Rd	20.0 Sec/LOS C	26.9 Sec/LOS C	20.3 Sec/LOS C	27.4 Sec/LOS C
SR 246/Refugio Rd	17.2 Sec/LOS B	28.6 Sec/LOS C	17.7 Sec/LOS B	27.7 Sec/LOS C
SR 246/Edison St	17.2 Sec/LOS B	23.8 Sec/LOS C	18.4 Sec/LOS B	23.2 Sec/LOS C
SR 246/SR 154	11.2 Sec/LOS B	19.5 Sec/LOS C	12.9 Sec/LOS B	**>50.0 Sec/LOS F**

Bolded values exceed Caltrans LOS D standard.

Alternative B

Traffic that would be generated by Alternative B was added to the Near-Term traffic volume forecasts in order to assess potential impacts. Figures 12 and 13 show the Near-Term + Alternative B traffic forecasts.

County Roadway Impacts. Near-Term Conditions and Near-Term + Alternative B forecasts for the County roadways adjacent to the Project site are shown in Table 10. As shown, the County roadway segments are forecast to carry volumes within their Acceptable Capacity ratings under Near-Term + Alternative B Conditions - indicating that they would operate at LOS B or better - which meets County's adopted standard. Thus, Alternative B would not significantly impact the County roadways adjacent to the Project site.

Table 10
Near-Term + Alternative B - County Roadway Operations

Roadway	ADT Volume			
	Near-Term	Project Added	Near-Term + Project	Acceptable Capacity(a)
Baseline Avenue e/o Edison Street	1,640	219	1,859	5,530
Armour Ranch Road e/o SR 154	700	1,357	2,057	5,530

(a) Acceptable Capacity rating equates to County's LOS B standard adopted for the Santa Ynez area.

State Highway Impacts. Near-Term and Near-Term + Alternative B level of service forecasts for SR 154 and SR 246 are shown in Tables 11 and 12. As shown in Table 11, the SR 154 highway segments are forecast to operate at LOS C-D under Near-Term and Near-Term + Alternative B conditions - which meets the Caltrans LOS D standard. Most of the key intersections along SR 246 are forecast to operate at LOS B or LOS C under Near-Term and Near-Term + Alternative B conditions (see Table 12).

As shown in Table 12, the SR 246/SR 154 intersection is forecast to degrade to LOS F during the P.M. peak hour period with traffic that would added by Alternative B. The level of service analysis shows that there would not be a sufficient number of gaps in the SR 154 traffic stream for Alternative B traffic to cross SR 154 when traveling to/from the Project site. Improvements required to accommodate the Near-Term + Alternative B traffic forecasts are presented in the Mitigation Measures section of the report.

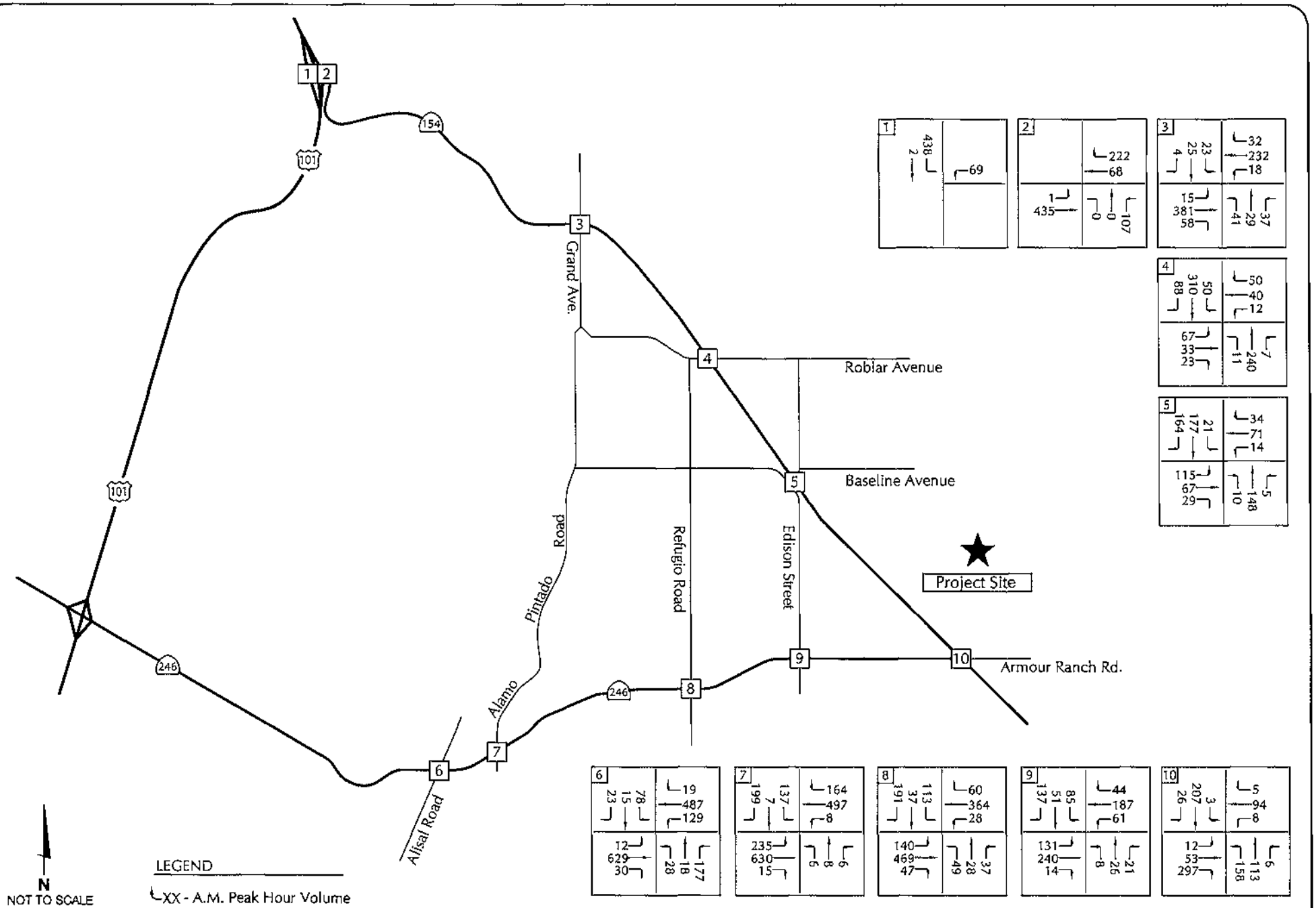

FIGURE 12

NEAR-TERM + PROJECT A.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE B

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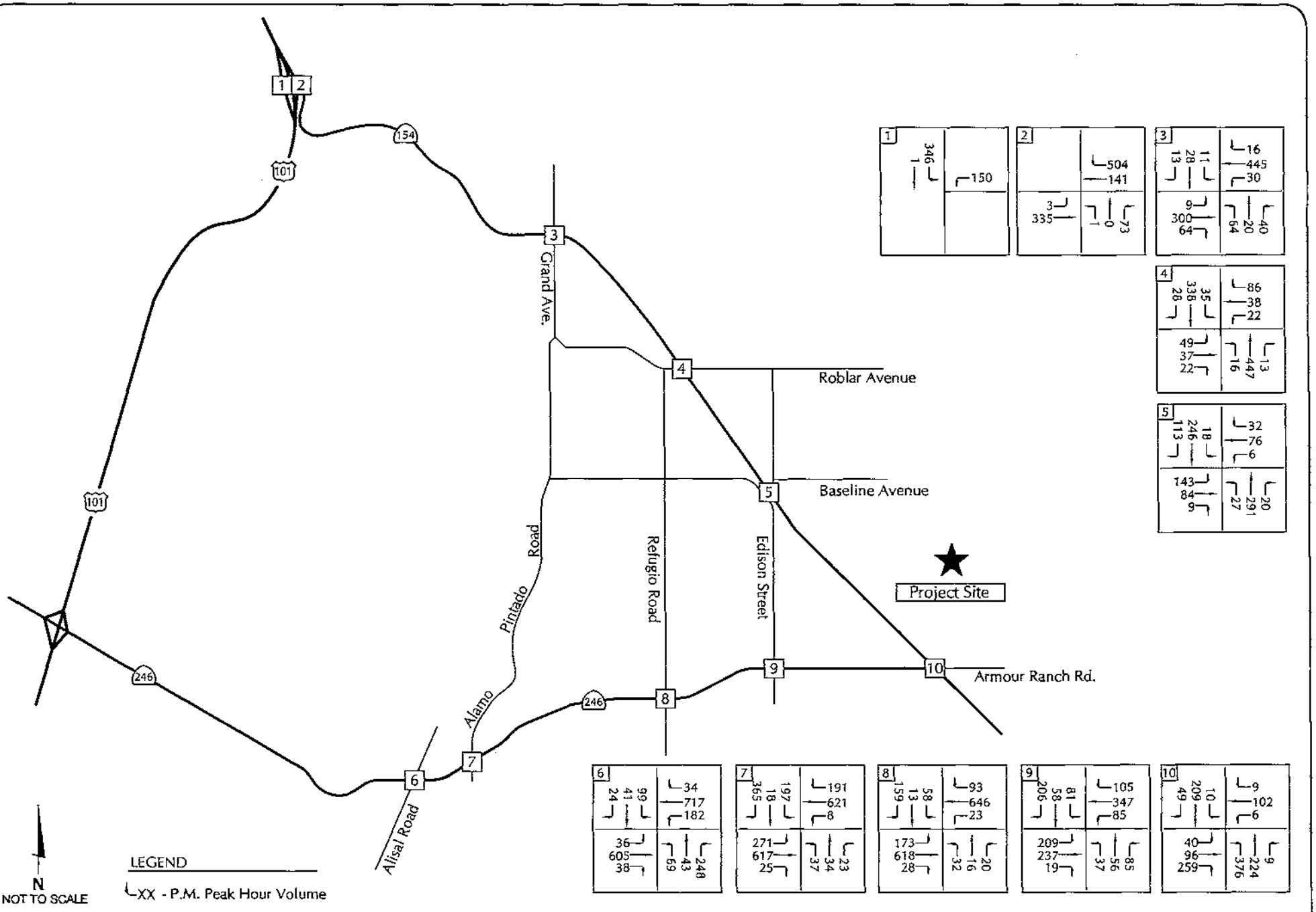

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NEAR-TERM + PROJECT P.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE B

FIGURE 13

MMF - #12018.02

Table 11
Near-Term + Alternative B - State Highway Segment Operations

Highway Segment	Peak Hour LOS	
	Near-Term	Near-Term + Project
SR 154 n/o Edison Street(a)	LOS D/LOS C	LOS D/LOS C
SR 154 s/o SR 246-Armour Ranch Road(a)	LOS D/LOS C	LOS D/LOS D
SR 246 from SR 154 to Solvang(b)	LOS B-C	LOS B-C

(a) Northbound/Southbound LOS based on travel speeds and ability to pass using P.M. peak hour flows.
(b) Signalized segment - LOS based on delays at intersections (See Table 12).

Table 12
Near-Term + Alternative B - State Highway Intersection Operations

Intersection	Delay / LOS			
	Near-Term		Near-Term + Project	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
SR 154/U.S. 101 SB	11.8 Sec/LOS B	10.5 Sec/LOS B	11.8 Sec/LOS B	10.6 Sec/LOS B
SR 154/U.S. 101 NB	12.0 Sec/LOS B	10.6 Sec/LOS B	12.1 Sec/LOS B	10.7 Sec/LOS B
SR 154/Grand Ave	15.5 Sec/LOS C	18.5 Sec/LOS C	15.7 Sec/LOS C	18.9 Sec/LOS C
SR 154/Roblar Ave	16.1 Sec/LOS C	20.4 Sec/LOS C	16.5 Sec/LOS C	20.9 Sec/LOS C
SR 154/Edison St	11.9 Sec/LOS B	15.4 Sec/LOS C	12.0 Sec/LOS B	15.7 Sec/LOS C
SR 246/Alisal Rd	19.5 Sec/LOS B	22.9 Sec/LOS C	21.3 Sec/LOS C	23.7 Sec/LOS C
SR 246/Alamo Pintado Rd	20.0 Sec/LOS C	26.9 Sec/LOS C	20.4 Sec/LOS C	27.5 Sec/LOS C
SR 246/Refugio Rd	17.2 Sec/LOS B	28.6 Sec/LOS C	17.8 Sec/LOS B	28.3 Sec/LOS C
SR 246/Edison St	17.2 Sec/LOS B	23.8 Sec/LOS C	18.5 Sec/LOS B	22.8 Sec/LOS C
SR 246/SR 154	11.2 Sec/LOS B	19.5 Sec/LOS C	13.1 Sec/LOS B	**>50.0 Sec/LOS F**

Bolded values exceed Caltrans LOS D standard.

CUMULATIVE CONDITIONS

Cumulative traffic forecasts were derived from the traffic study prepared for the Santa Ynez Valley Community Plan. The 20-Year Buildout forecasts were used for the analysis. Figures 14 and 15 shows the Cumulative traffic volume forecasts. Levels of service for Cumulative Conditions are compared to Cumulative + Project Conditions in the following section.

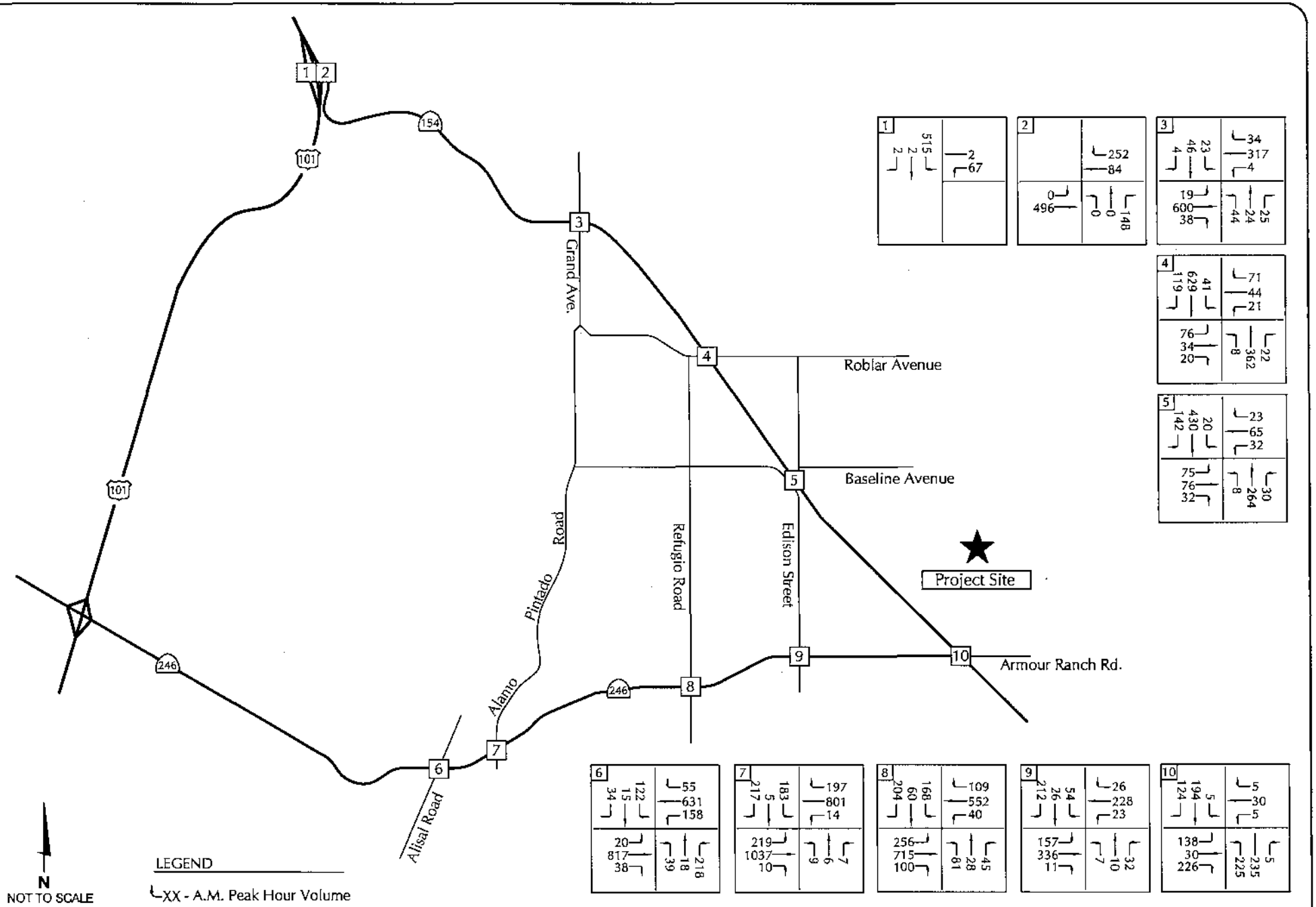

FIGURE 14

CUMULATIVE A.M. PEAK HOUR TRAFFIC VOLUMES

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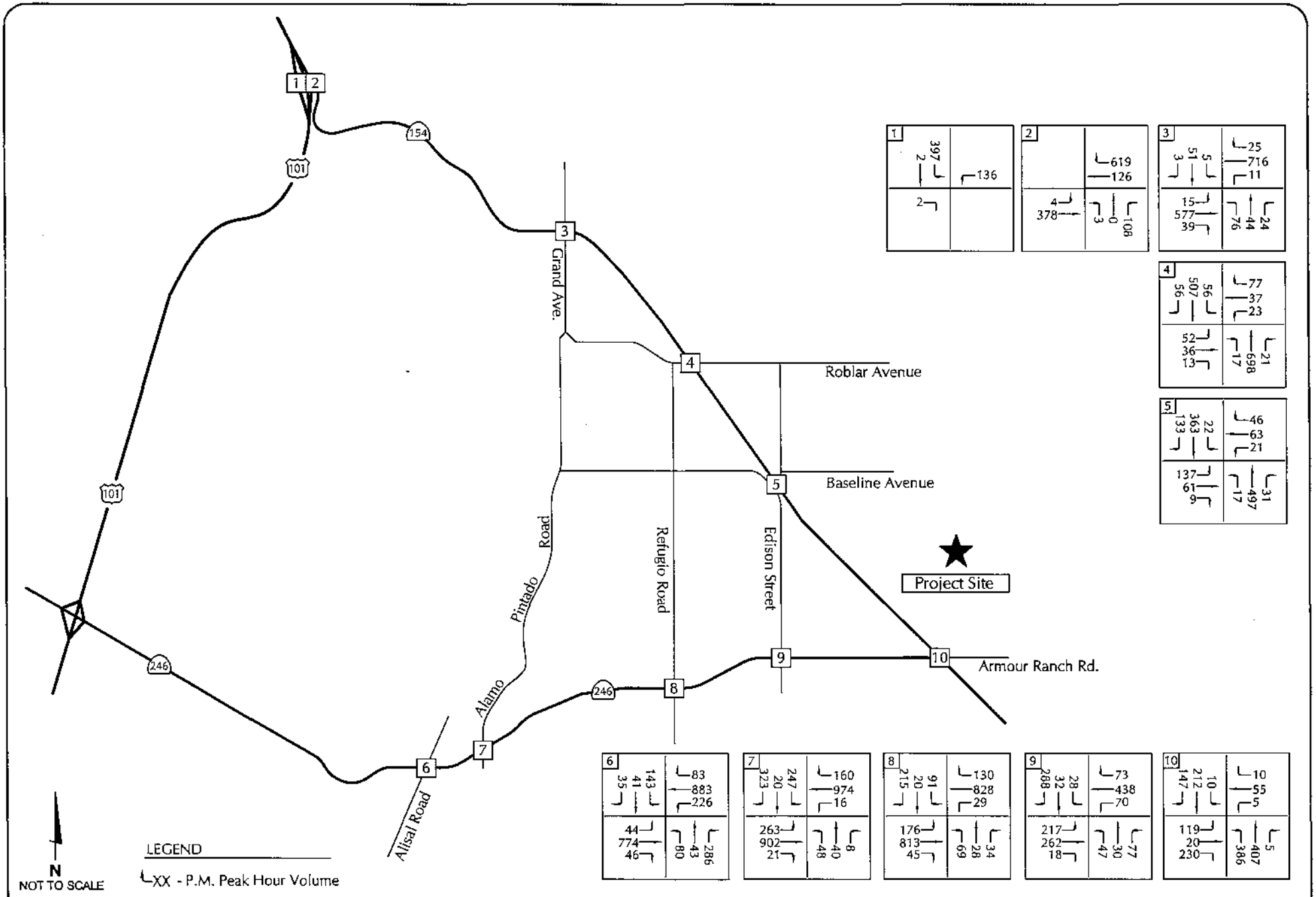

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CUMULATIVE P.M. PEAK HOUR TRAFFIC VOLUMES

FIGURE 15

MMF - #12018.02

CUMULATIVE + PROJECT CONDITIONS

Alternative A

Alternative A traffic was added to the Cumulative traffic forecasts in order to assess potential impacts. Figures 16 and 17 show the Cumulative + Alternative A traffic forecasts.

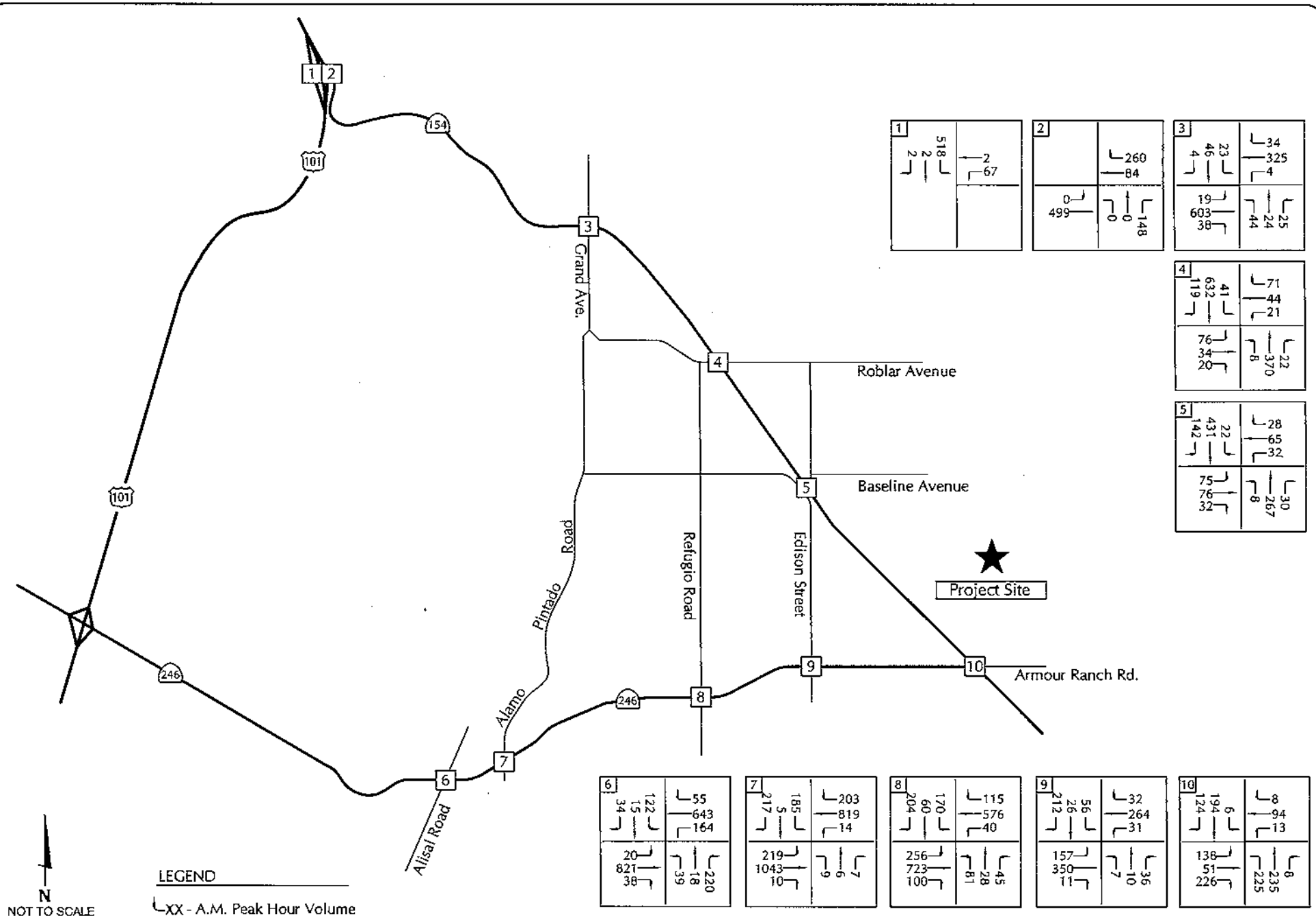
County Roadway Impacts. Cumulative and Cumulative + Alternative A forecasts for the County roadways adjacent to the Project site are shown in Table 13. As shown, the County roadway segments are forecast to carry volumes within their Acceptable Capacity ratings under Cumulative + Alternative A Conditions - indicating that they would operate at LOS B or better - which meets County's adopted standard. Thus, Alternative A would not significantly impact the County roadways adjacent to the Project site.

Table 13
Cumulative + Alternative A - County Roadway Operations

Roadway	ADT Volume			
	Cumulative	Project Added	Cumulative + Project	Acceptable Capacity(a)
Baseline Avenue e/o Edison Street	1,800	205	2,005	5,530
Armour Ranch Road e/o SR 154	900	1,164	2,064	5,530

(a) Acceptable Capacity rating equates to County's LOS B standard adopted for the Santa Ynez area.

State Highway Impacts. Cumulative and Cumulative + Alternative A level of service forecasts for SR 154 and SR 246 are shown in Tables 14 and 15. As shown in Table 14, operations on SR 154 are forecast to degrade to LOS E in the northbound direction during the peak hour period, which exceeds the Caltrans LOS D standard. Furthermore, as shown in Table 15, several of the key intersections along SR 154 and SR 246 are forecast to degrade to LOS E or LOS F, also exceeding the Caltrans LOS D standard. Improvements required to accommodate the Cumulative + Alternative A traffic forecasts are presented in the Mitigation Measures section of the report.



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CUMULATIVE + PROJECT A.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE A

FIGURE 16

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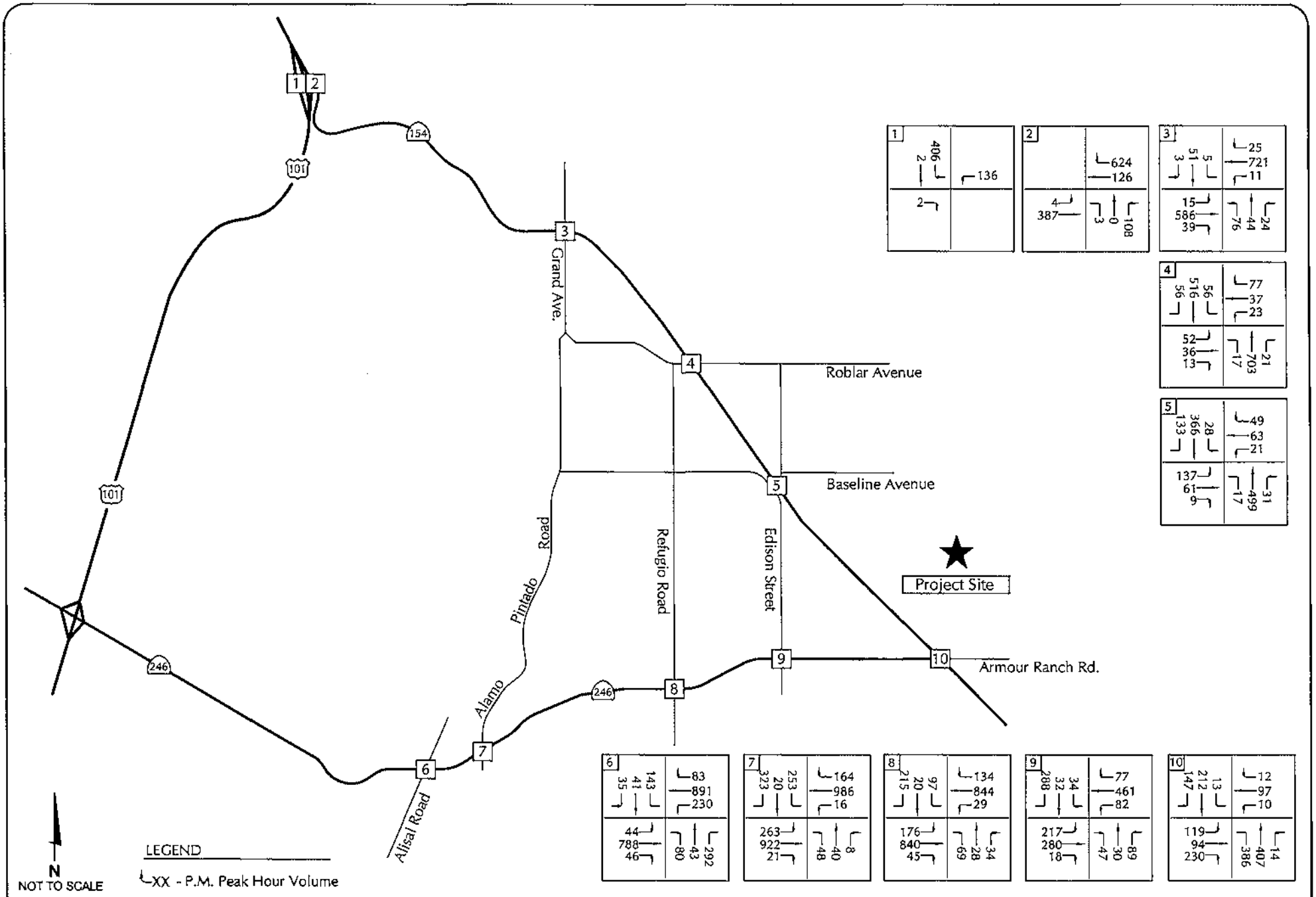

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CUMULATIVE + PROJECT P.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE A

FIGURE 17

MMF - #12018.02

Table 14
Cumulative + Alternative A - State Highway Segment Operations

Highway Segment	Peak Hour LOS	
	Cumulative	Cumulative + Project
SR 154 n/o Edison Street(a)	**LOS E**/LOS D	**LOS E**/LOS D
SR 154 s/o SR 246-Armour Ranch Road(a)	**LOS E**/LOS C	**LOS E**/LOS C
SR 246 from SR 154 to Solvang(b)	LOS B-**LOS F**	LOS B-**LOS F**

Bolded values exceed Caltrans LOS D standard.
(a) Northbound/Southbound LOS based on travel speeds and ability to pass using P.M. peak hour flows.
(b) Signalized segment - LOS based on delays at intersections (See Table 15).

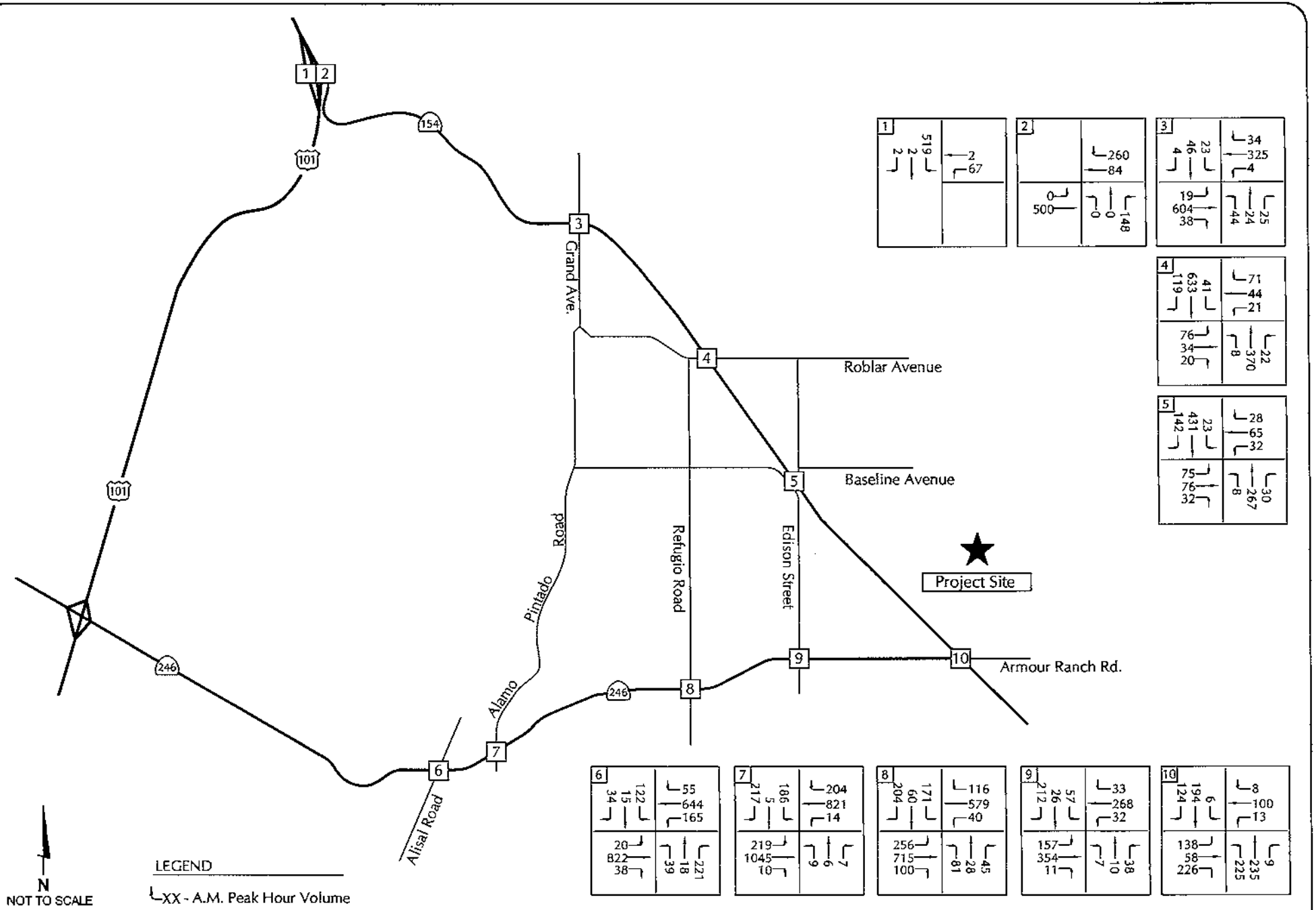
Table 15
Cumulative + Alternative A - State Highway Intersection Operations

Intersection	Delay / LOS			
	Cumulative		Cumulative + Project	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
SR 154/U.S. 101 SB	14.1 Sec/LOS B	11.4 Sec/LOS B	14.1 Sec/LOS B	11.6 Sec/LOS B
SR 154/U.S. 101 NB	13.5 Sec/LOS B	11.6 Sec/LOS B	13.6 Sec/LOS B	11.7 Sec/LOS B
SR 154/Grand Ave	23.9 Sec/LOS C	**> 50.0 Sec/LOS F**	24.3 Sec/LOS C	**> 50.0 Sec/LOS F**
SR 154/Roblar Ave	**> 50.0 Sec/LOS F**	**> 50.0 Sec/LOS F**	**> 50.0 Sec/LOS F**	**> 50.0 Sec/LOS F**
SR 154/Edison St	**44.6 Sec/LOS E**	**> 50.0 Sec/LOS F**	**46.9 Sec/LOS E**	**> 50.0 Sec/LOS F**
SR 246/Alisal Rd	31.9 Sec/LOS C	51.1 Sec/LOS D	33.3 Sec/LOS C	54.1 Sec/LOS D
SR 246/Alamo Pintado Rd	50.4 Sec/LOS D	**65.4 Sec/LOS E**	52.7 Sec/LOS D	**67.7 Sec/LOS E**
SR 246/Refugio Rd	33.0 Sec/LOS C	**68.1 Sec/LOS E**	35.0 Sec/LOS C	**73.7 Sec/LOS E**
SR 246/Edison St	18.5 Sec/LOS B	22.1 Sec/LOS C	17.3 Sec/LOS B	23.7 Sec/LOS C
SR 246/SR 154	30.8 Sec/LOS D	**> 50.0 Sec/LOS F**	**> 50.0 Sec/LOS F**	**> 50.0 Sec/LOS F**

Bolded values exceed Caltrans LOS D standard.

Alternative B

Alternative B traffic was added to the Cumulative traffic forecasts in order to assess potential impacts. Figures 18 and 19 show the Cumulative + Alternative B traffic forecasts.



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CUMULATIVE + PROJECT A.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE B

FIGURE 18

MMF - #12018.02

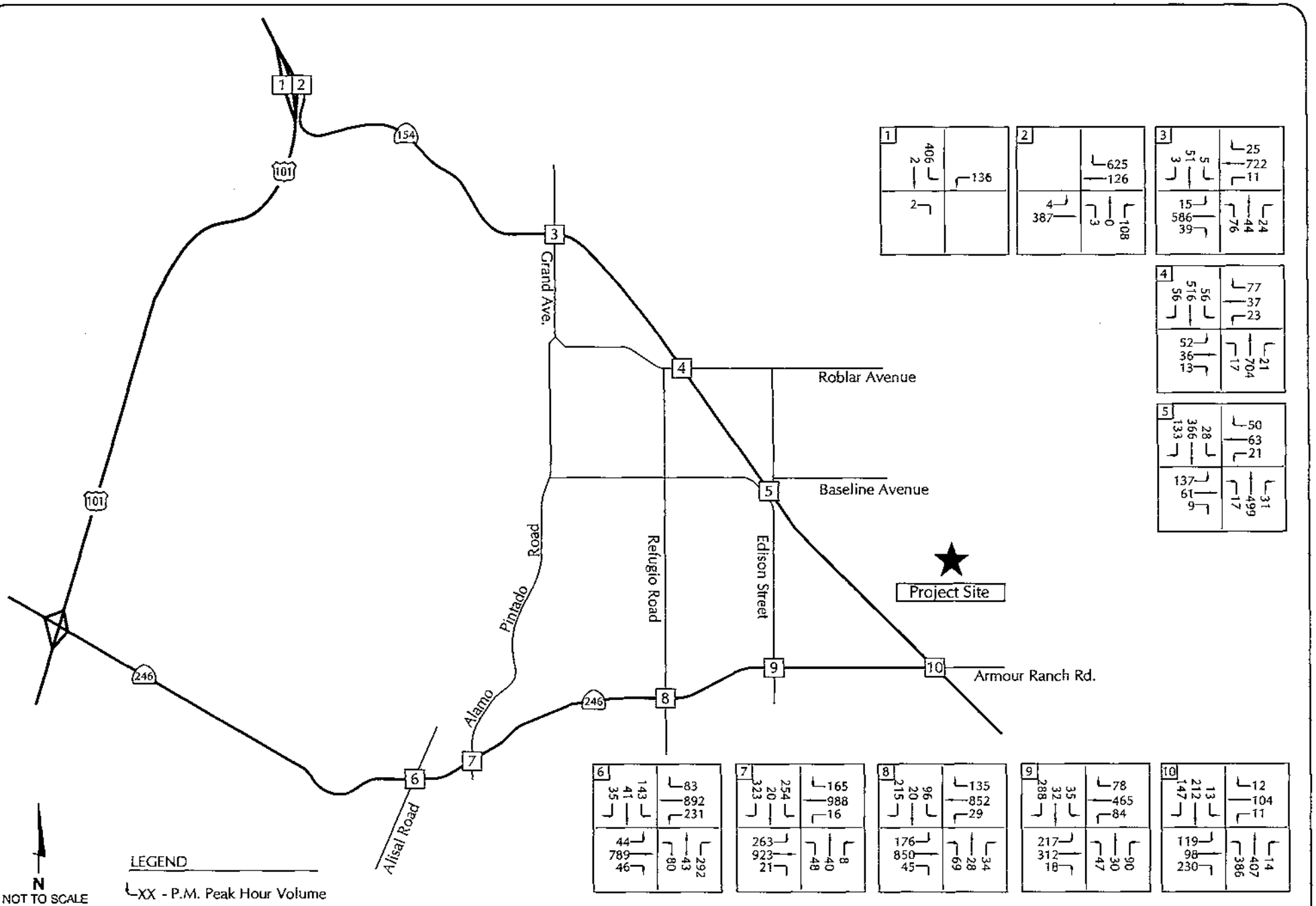


FIGURE 19

CUMULATIVE + PROJECT P.M. PEAK HOUR TRAFFIC VOLUMES - ALTERNATIVE B

ASSOCIATED TRANSPORTATION ENGINEERS

MMF - #12018.02

County Roadway Impacts. Cumulative and Cumulative + Alternative B forecasts for the County roadways adjacent to the Project site are shown in Table 16. As shown, the County roadway segments are forecast to carry volumes within their Acceptable Capacity ratings under Cumulative + Alternative B Conditions - indicating that they would operate at LOS B or better - which meets County's adopted standard. Thus, Alternative B would not significantly impact the County roadways adjacent to the Project site.

Table 16
Cumulative + Alternative B - County Roadway Operations

Roadway	ADT Volume			
	Cumulative	Project Added	Cumulative + Project	Acceptable Capacity(a)
Baseline Avenue e/o Edison Street	1,800	219	2,019	5,530
Armour Ranch Road e/o SR 154	900	1,357	2,257	5,530

(a) Acceptable Capacity rating equates to County's LOS B standard adopted for the Santa Ynez area.

State Highway Impacts. Cumulative and Cumulative + Alternative B level of service forecasts for SR 154 and SR 246 are shown in Tables 17 and 18. Operations on SR 154 are forecast to degrade to LOS E in the northbound direction during the peak hour period, which exceeds the Caltrans LOS D standard (see Table 17). Additionally, several of the key intersections along SR 154 and SR 246 are forecast to degrade to LOS E or LOS F, also exceeding the Caltrans LOS D standard (see Table 18).

Table 17
Cumulative + Alternative B - State Highway Segment Operations

Highway Segment	Peak Hour LOS	
	Cumulative	Cumulative + Project
SR 154 n/o Edison Street(a)	**LOS E**/LOS D	**LOS E**/LOS D
SR 154 s/o SR 246-Armour Ranch Road(a)	**LOS E**/LOS C	**LOS E**/LOS C
SR 246 from SR 154 to Solvang(b)	LOS B-**LOS F**	LOS B-**LOS F**

Bolded values exceed Caltrans LOS D standard.
(a) Northbound/Southbound LOS based on travel speeds and ability to pass using P.M. peak hour flows.
(b) Signalized segment - LOS based on delays at intersections (See Table 15).

Table 18
Cumulative + Alternative B - State Highway Intersection Operations

Intersection	Delay / LOS			
	Cumulative		Cumulative + Project	
	A.M. Peak	P.M. Peak	A.M. Peak	P.M. Peak
SR 154/U.S. 101 SB	14.1 Sec/LOS B	11.4 Sec/LOS B	14.2 Sec/LOS B	11.6 Sec/LOS B
SR 154/U.S. 101 NB	13.5 Sec/LOS B	11.6 Sec/LOS B	13.6 Sec/LOS B	11.7 Sec/LOS B
SR 154/Grand Ave	23.9 Sec/LOS C	**>50.0 Sec/LOS F**	24.3 Sec/LOS C	**>50.0 Sec/LOS F**
SR 154/Roblar Ave	**>50.0 Sec/LOS F**	**>50.0 Sec/LOS F**	**>50.0 Sec/LOS F**	**>50.0 Sec/LOS F**
SR 154/Edison St	**44.6 Sec/LOS E**	**>50.0 Sec/LOS F**	**46.8 Sec/LOS E**	**>50.0 Sec/LOS F**
SR 246/Alisal Rd	31.9 Sec/LOS C	51.1 Sec/LOS D	33.6 Sec/LOS C	54.4 Sec/LOS D
SR 246/Alamo Pintado Rd	50.4 Sec/LOS D	**65.4 Sec/LOS E**	**53.1 Sec/LOS D**	**68.0 Sec/LOS E**
SR 246/Refugio Rd	33.0 Sec/LOS C	**68.1 Sec/LOS E**	35.2 Sec/LOS D	**76.3 Sec/LOS E**
SR 246/Edison St	18.5 Sec/LOS B	22.1 Sec/LOS C	17.5 Sec/LOS B	23.6 Sec/LOS C
SR 246/SR 154	30.8 Sec/LOS D	**>50.0 Sec/LOS F**	**>50.0 Sec/LOS F**	**>50.0 Sec/LOS F**

Bolded values exceed Caltrans LOS D standard.

MITIGATION MEASURES

Near Term Measures

SR 246/SR 154. The SR 246/SR 154 intersection is forecast to degrade to LOS F during the P.M. peak hour under Near-Term + Project conditions (both alternatives). Caltrans has begun construction of a safety improvement project for the intersection. The improvement project will convert the roadway geometry to a modern roundabout. The roundabout project is now under construction and scheduled for completion in October 2014. According to Caltrans' operational analyses, the roundabout will provide LOS A operations during A.M. and P.M. peak hour periods assuming Opening Day and Year 2035 traffic. Thus, the improvement will mitigate the impact generated by the Chumash Camp 4 Residential Fee-to-Trust Project in the Near Term and Cumulative scenarios.

Cumulative Measures

The Cumulative analysis found that traffic operations along SR 154 and SR 246 are forecast to degrade to LOS E or LOS F, as listed below. It is important to note that these locations would operate at LOS E/LOS F with and without the Project.

Cumulative Impacts
SR 154 north of Edison Street (LOS E)
SR 154 south of SR 246-Armour Ranch Road (LOS E)
SR 154/Grand Avenue (P.M. Peak Hour = LOS F)
SR 154/Roblar Avenue (A.M. & P.M. Peak Hour = LOS F)
SR 154/Edison Street (A.M. Peak Hour = LOS E / P.M. Peak Hour = LOS F)
SR 246/Alamo Pintado Road (P.M. Peak Hour = LOS E)
SR 246/Refugio Road (P.M. Peak Hour = LOS E)
SR 246/SR 154 (A.M. & P.M. Peak Hour = LOS F)

The following mitigations are consistent with what is being planned by the County for the Santa Ynez area since they were derived from the adopted Santa Ynez Community Plan. The Project's contribution to the mitigation measures are listed in Table 19 at the end of this section.

SR 154 Corridor

Roundabout Intersections. The first option for the SR 154 corridor is the installation of modern roundabouts at the major cross street intersections. Evenly spaced single-lane roundabouts would provide acceptable levels of service along the corridor. Based on future traffic volume forecasts, intersection spacing, and forecasted levels of service, single-lane roundabouts would be provided at the following four locations:

SR 154/Grand Avenue
SR 154/Roblar Avenue
SR 154/Edison Street
SR 154/SR 246-Armour Ranch Road

The operational analyses found that the single-lane roundabouts will operate at LOS A during the P.M. peak hour period with the 20-Year Buildout traffic forecast, thus meeting the Caltrans LOS D standard. The roundabouts would provide relatively free-flow operations along SR 154 with minor delays for traffic entering or crossing SR 154 at the collector road connections.

Signalized Intersections. The second option for the SR 154 corridor is installing signals at evenly spaced intersections. Based on future traffic volumes, intersection spacing, forecasted levels of service, and signal warrants, signalized intersections would be provided at:

SR 154/Grand Avenue
SR 154/Roblar Avenue
SR 154/Edison Street
SR 154/SR 246-Armour Ranch Road

The operational analysis found that the SR 154 corridor will operate at LOS B under 20-Year Buildout conditions during the P.M. peak hour period with the signalized option, thus meeting the Caltrans LOS D standard. The signalized corridor would provide relatively free-flow operations along SR 154 with minor delays for traffic entering or crossing SR 154 at the signalized collector road connections.

SR 246 Corridor

Roundabout Intersections. The first option for the SR 246 corridor is the installation of evenly spaced roundabouts. Based on future traffic volume forecasts, intersection spacing, and forecasted levels of service, two-lane roundabouts should be provided at the following locations:

SR 246/Alamo Pintado Road
SR 246/Edison Street
SR 246/Refugio Road
SR 246-Armour Ranch Road/SR 154

It is noted that the SR 246/Alamo Pintado Road intersection lies within the City of Solvang. The City prepared a Project Study Report to address the future deficiency. The project is now in the PA/ED phase and preferred alternative is to convert the intersections into a modern roundabout. The project is anticipated to be constructed in Year 2015.

The operational analyses found that the two-lane roundabouts will operate at LOS A during the P.M. peak hour period with the 20-Year Buildout traffic forecast, thus meeting the Caltrans LOS D standard. The roundabouts would provide relatively free-flow operations along SR 154 with minor delays for traffic entering or crossing SR 246 at the roundabouts.

Signalized Intersections. This mitigation option found that SR 246 would need to be widened to provide 2 eastbound and 2 westbound lanes on the signalized approaches at the following intersections in order to accommodate the 20-Year Buildout peak hour flows.

SR 246/Alamo Pintado Road
SR 246/Edison Street
SR 246/Refugio Road
SR 246-Armour Ranch Road/SR 154

The operational analyses found that the signalized option would provide LOS B, thus meeting the Caltrans LOS D standard. Evenly spaced signals along the SR 246 corridor would also provide gaps in the SR 246 traffic stream and thereby also reduce delays for traffic to enter or cross SR 246 at the local road connections between the signalized intersections.

Project Contributions

Table 19 shows the Project's contribution to the cumulative mitigations. The Project's contribution to the mitigations were calculated using the Caltrans formula derived from the Caltrans traffic study guidelines.[5]

Table 19
Proportionate Share Percentages

Intersection	Proportionate Share % (A.M./P.M.)	
	Alternative A	Alternative B
SR 154/Grand Ave	2.9% / 2.0%	3.2% / 2.2%
SR 154/Roblar Ave	1.8% / 2.4%	2.0% / 2.6%
SR 154/Edison St	2.5% / 3.0%	2.8% / 3.2%
SR 154/SR 246	15.4% / 22.5%	20.9% / 23.2%
SR 246/Alamo Pintado Rd	3.5% / 5.3%	4.1% / 5.9%
SR 246/Edison St	19.8% / 29.4%	22.6% / 31.50%
SR 246/Refugio Rd	4.3% / 6.6%	5.1% / 7.2%

Proportionate Share Percentage = Project Trips / (Cumulative+Project Volume - Existing Volume).

SITE ACCESS AND CIRCULATION

Alternative A

Access for Alternative A is proposed via 2 connections to Baseline Avenue and 1 connection to Armour Ranch Road (see Figure 2). Traffic signals would not be warranted at access connections. Instead, Stop signs should be provided on the northbound roadway connections to Baseline Avenue and on the southbound roadway connection to Armour Ranch Road. Review of the on-site circulation system found that traffic signals would not be warranted. The interior roads system would provide adequate access to the residential lots.

[5] Guide for the Preparation of Traffic Impact Studies, Caltrans, December 2002.

Alternative B

Access for Alternative B would be provided via 2 connections to Baseline Avenue and 1 connection to Armour Ranch Road (see Figure 3). Traffic signals would not be warranted at access connections. Instead, Stop signs should be provided on the northbound roadway connections to Baseline Avenue and on the southbound roadway connection to Armour Ranch Road. Review of the on-site circulation system found that traffic signals would not be warranted. The interior roads system would provide adequate access to the residential lots and Tribal Hall facility.

■ ■ ■

REFERENCES AND PERSONS CONTACTED

Associated Transportation Engineers

Richard L. Pool, PE, Principal Engineer
Dan Dawson, PTP, Supervising Transportation Planner
Matthew Farrington, Transportation Planner I

References

2010 Highway Capacity Manual, Transportation Research Board, 2010.

Guide for the Preparation of Traffic Impact Studies, Caltrans, December 2002.

Traffic and Circulation Study for the Santa Ynez Valley Community Plan, Associated Transportation Engineers, April, 2008.

Transportation Concept Report State Route 154, California Department of Transportation District 5, February 2007.

Transportation Concept Report State Route 246, California Department of Transportation District 5, May 2004.

Trip Generation, Institute of Transportation Engineers, 8th Edition, 2008.

Trip Generation Handbook, an ITE Recommended Practice, 2nd Edition, 2004.

Persons Contacted

William Robertson, County of Santa Barbara
Paul McClintic, Caltrans
Frank Boyle, Caltrans
Chris Shaeffer, Caltrans
Larry Newland, Caltrans

TECHNICAL APPENDIX

CONTENTS:

LEVEL OF SERVICE DEFINITIONS

The ability of a roadway system to carry traffic is most often expressed in terms of "Levels of Service" (LOS). LOS A through F are used, with LOS A indicating very good operations and LOS F indicating poor operations. More complete level of service definitions for intersections are listed Table A. The delay ranges for signalized and unsignalized intersections are shown in Table B.

Table A
Level of Service Definitions

LOS	Definition
A	Conditions of free unobstructed flow, no delays and all signal phases sufficient in duration to clear all approaching vehicles.
B	Conditions of stable flow, very little delay, a few phases are unable to handle all approaching vehicles.
C	Conditions of stable flow, delays are low to moderate, full use of peak direction signal phases is experienced.
D	Conditions approaching unstable flow, delays are moderate to heavy, significant signal time deficiencies are experienced for short durations during the peak traffic period.
E	Conditions of unstable flow, delays are significant, signal phase timing is generally insufficient, congestion exists for extended duration throughout the peak period.
F	Conditions of forced flow, travel speeds are low and volumes are well above capacity. This condition is often caused when vehicles released by an upstream signal are unable to proceed because of back-ups from a downstream signal.

Table B
Levels of Service Delay Ranges

LOS	Unsignalized Delay	Signalized V/C Ratio
A	< 10.0	< 10.0
B	10.1-15.0	10.1-20.0
C	15.1-25.0	20.1-35.0
D	25.1-35.0	35.1-55.0
E	35.1-50.0	55.1-80.0
F	> 50.0	> 80.0

PROJECT TRIP GENERATION CALCULATIONS

Associated Transportation Engineers
Trip Generation Worksheet With In/Out Splits

CHUMASH CAMP 4 PROJECT (#12018)

ALTERNATIVE A

LAND-USE	SIZE	ADT		A.M. PEAK HOUR						P.M. PEAK HOUR					
		RATE	TRIPS	RATE	TRIPS	IN%	TRIPS	OUT%	TRIPS	RATE	TRIPS	IN%	TRIPS	OUT%	TRIPS
SINGLE FAMILY HOUSING (a)	143	9.57	1,369	0.750	107	25%	27	75%	80	1.01	144	64%	92	36%	52
PROJECT TOTAL:			1,369		107		27		80		144		92		52

ALTERNATIVE B

LAND-USE	Size	ADT		A.M. PEAK HOUR						P.M. PEAK HOUR					
		RATE	TRIPS	RATE	TRIPS	IN%	TRIPS	OUT%	TRIPS	RATE	TRIPS	IN%	TRIPS	OUT%	TRIPS
SINGLE FAMILY HOUSING (a)	143	9.57	1,369	0.7S0	107	25%	27	75%	80	1.01	144	64%	92	36%	52
COMMUNITY CENTER/TRIBAL RETREAT (b)	12,042	22.88	276	1.620	20	61%	12	39%	8	1.45	17	37%	6	63%	11
PROJECT TOTAL:			1,645		127		39		88		161		98		63

(a) ITE 8TH EDITION RATES FOR SINGLE FAMILY HOMES (LAND USE #210)
(b) ITE 8TH EDITION RATES FOR RECREATIONAL COMMUNITY CENTER (LAND USE #495)

3

CUMULATIVE PROJECT LIST - TRIP GENERATION WORKSHEET

Associated Transportation Engineers
Trip Generation Worksheet - With In/Out Splits

CUMULATIVE PROJECT TRIP GENERATION - WEEKDAY

Land Use	Size	Multi-Trip	ADT		A.M.						P.M.					
			Rate	Trips	Rate	Trips	In %	Trips	Out %	Trips	Rate	Trips	In %	Trips	Out %	Trips
Thomson Parcel	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
Marcelino Springs	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
Kalsow Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Valley Sand & Soil				20												
Stull Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Coffey Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Ricci Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
McCombs Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Higgins/Martino Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Lorenzen Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Meyer Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Lash Commercial	5,645	1.00	46.55	263	1.400	8	61%	5	39%	3	4.55	26	44%	11	56%	15
Granite Mining (ATE #10016)				70		7		3		4		0				
Skytt Family Lot Split	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
Hanson Parcel (SFD)	2	1.00	9.57	19	0.750	2	25%	1	75%	1	1.01	2	63%	1	37%	1
Estelle Vineyard Estates	11	1.00	9.57	105	0.750	8	25%	2	75%	6	1.01	11	63%	7	37%	4
Haas Tract	8	1.00	9.57	77	0.750	6	25%	2	75%	4	1.01	8	63%	5	37%	3
Edison St. Service Ctr/Car Wash	10	0.38	152.84	581	11.930	45	51%	23	49%	22	13.94	53	51%	27	49%	26
Turnbull Tract	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
Gavlak Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
SY Valley Airport	8	1.00	1.97	16	0.000	0	25%	0	75%	0	0.00	0	63%	0	37%	0
SY Valley SR. Housing	22	1.00	3.48	77	0.130	3	38%	1	62%	2	0.16	4	63%	3	37%	1
Bar Z Lot Split	2	1.00	9.57	19	0.750	2	25%	1	75%	1	1.01	2	63%	1	37%	1
Valley Compost Facility	10	1.00	2.00	20	0.000	0	25%	0	75%	0	0.00	0	63%	0	37%	0
Mattei's Tavern (ATE #07084)	64	1.00	8.17	1	0.560	36	51%	18	49%	18	0.59	38	53%	20	47%	18
Cottages (To Be Removed)	-3	1.00	9.57	-29	0.750	-2	25%	-1	75%	-1	1.01	-3	63%	-2	37%	-1
Duplex/Triplex (to Be Removed)	-5	1.00	6.65	-33	0.510	-3	25%	-1	75%	-2	0.62	-3	63%	-2	37%	-1
Vincent Winery				24								4	25%	1	75%	3
De Werd Winery				25								7	25%	2	75%	5
TTT Winery				16								3	25%	1	75%	2
Lamer Winery				35								9	25%	2	75%	7
Claxton Winery				41								9	25%	2	75%	7
El Camino Real Winery				40								9	25%	2	75%	7
Bridlewood Winery				14								1	25%	0	75%	1
Project Total:				**1,607**		**129**		**58**		**71**		**201**		**98**		**103**

S/O SR246

Thomson Parcel	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
SUB-TOTAL:				***29***		***2***		***1***		***1***		***3***		***2***		***1***

SANTA YNEZ AREA

Coffey Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Ricci Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
McCombs Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Edison St. Service Ctr/Car Wash	10	0.38	152.84	581	11.930	45	51%	23	49%	22	13.94	53	51%	27	49%	26
SY Valley Airport	8	1.00	1.97	16	0.000	0	25%	0	75%	0	0.00	0	63%	0	37%	0
SY Valley SR. Housing	22	1.00	3.48	77	0.130	3	38%	1	62%	2	0.16	4	63%	3	37%	1
Chumash Hotel Expansion	215	1.00	5.70	1,226	0.310	67	72%	48	28%	19	0.42	90	43%	39	57%	51
Claxton Winery				41								9	25%	2	75%	7
SUB-TOTAL:				***1971***		***118***		***72***		***46***		***159***		***74***		***85***

BASELINE RD. E/O SR154

Stull Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Hanson Parcel (SFD)	2	1.00	9.57	19	0.750	2	25%	1	75%	1	1.01	2	63%	1	37%	1
SUB-TOTAL:				***29***		***3***		***1***		***2***		***3***		***2***		***1***

ROBLAR AVE. E/O SR154

Estelle Vineyard Estates	11	1.00	9.57	105	0.750	8	25%	2	75%	6	1.01	11	63%	7	37%	4
Vincent Winery				24								4	25%	1	75%	3
TTT Winery				16								3	25%	1	75%	2
Bridlewood Winery				26								3	25%	1	75%	2
Turnbull Tract	3	1.00	9.57	29	0.750	2	25%	1	75%	1	1.01	3	63%	2	37%	1
SUB-TOTAL:				***200***		***10***		***3***		***7***		***24***		***12***		***12***

BAILLARD AREA

Kalsow Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Higgins/Martino Lot Split	1	1.00	9.57	10	0.750	1	25%	0	75%	1	1.01	1	63%	1	37%	0
Gavlak Lot Split	2	1.00	9.57	19	0.750	2	25%	1	75%	1	1.01	2	63%	1	37%	1
SUB-TOTAL:				***39***		***4***		***1***		***3***		***4***		***3***		***1***

LOS OLIVOS AREA

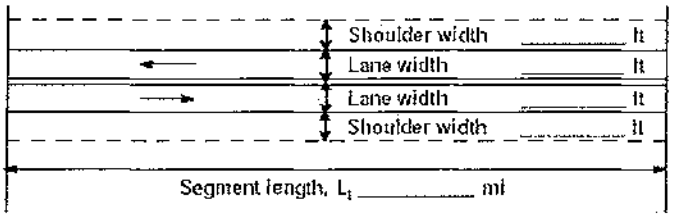
Valley Sand & Soil				20												
Lash Commercial	5,645	1.00	46.55	263	1.400	8	61%	5	39%	3	4.55	26	44%	11	56%	15
De Werd Winery	9,856	1.00		25								7	25%	2	75%	5
El Camino Real Winery				40								9	25%	2	75%	7
Mattei's Tavern				461		36		18		18		32		16		16
SUB-TOTAL:				***809***		***44***		***23***		***21***		***74***		***31***		***43***

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	EXISTING

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 412veh/h

Opposing direction vol., V_o 320veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.3
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.988
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	472	368

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	3.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	49.8 mi/h
		Percent free flow speed, PFFS	83.4 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	0.996
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	468	365
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	47.6	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	41.7	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	71.0	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.28
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1680
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1693

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*83.4*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*468.2*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.00*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

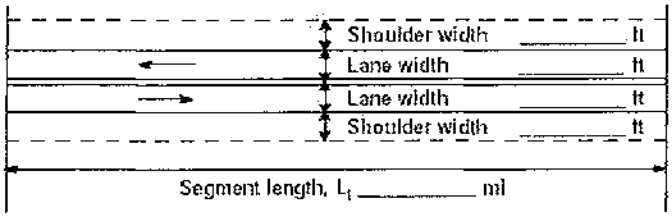
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	EXISTING

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d	320veh/h
Opposing direction vol., V_o	412veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.3	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.988	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	368	472

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, FFS=S_{FM}+0.00776(v/ $f_{HV,ATS}$)		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.8 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, ATS_d=FFS-0.00776($v_{d,ATS}$ + $v_{o,ATS}$) - $f_{np,ATS}$	50.4 mi/h
		Percent free flow speed, PFFS	84.4 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.1	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	365	468
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	41.8	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	41.7	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	60.1	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.22
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1686
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

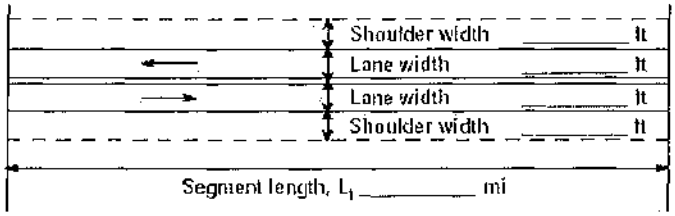
Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*84.4*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*363.6*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*2.87*
Bicycle level of service (Exhibit 15-4)	*C*
Notes	
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain. 2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F. 3. For the analysis direction only and for v>200 veh/h. 4. For the analysis direction only 5. Exhibit 15-20 provides coefficients a and b for Equation 15-10. 6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.	

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 460veh/h

Opposing direction vol., V_o 368veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.3
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.988
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	527	423

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	3.1 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	49.3 mi/h
		Percent free flow speed, PFFS	82.4 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	523	418
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	51.3	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	39.2	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	73.1	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.31
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1680
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*82.4*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*522.7*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.05*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

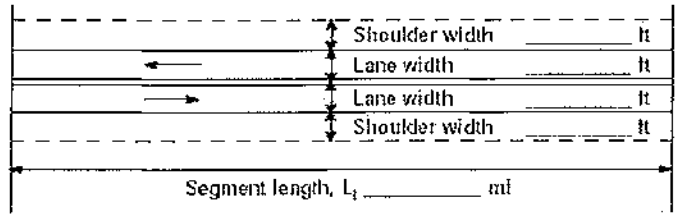
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Analysis direction vol., V_d	368veh/h	Grade Length	mi Up/down
Opposing direction vol., V_o	460veh/h	Peak-hour factor, PHF	0.88
Shoulder width ft	6.0	No-passing zone	90%
Lane Width ft	12.0	% Trucks and Buses , P_T	4 %
Segment Length mi	1.0	% Recreational vehicles, P_R	2%
		Access points mi	1/mi

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.3	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.988	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	423	527

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})$ - $f_{np,ATS}$	49.9 mi/h
		Percent free flow speed, PFFS	83.6 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	418	523
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	46.4	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	39.2	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	63.8	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, v/c	0.25
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1686
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_o$(Equation 15-11 - Class III only)	*83.6*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*418.2*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*2.94*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

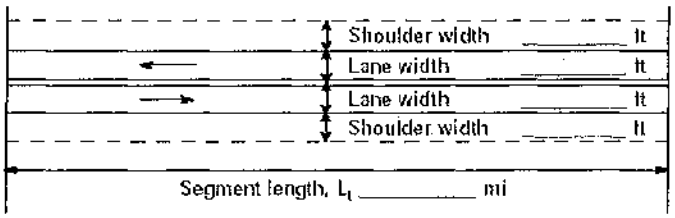
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014 + PROJECT (ALT 1)

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d	465veh/h
Opposing direction vol., V_o	377veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.3
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.988
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	533	434

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, FFS=S_{FM}+0.00776(v/ $f_{HV,ATS}$)		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	3.0 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, ATS_d=FFS-0.00776($v_{d,ATS}$ + $v_{o,ATS}$) - $f_{np,ATS}$	49.2 mi/h
		Percent free flow speed, PFFS	82.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	528	428
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	52.7	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	39.0	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	74.2	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.31
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1680
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*82.3*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*528.4*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.06*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

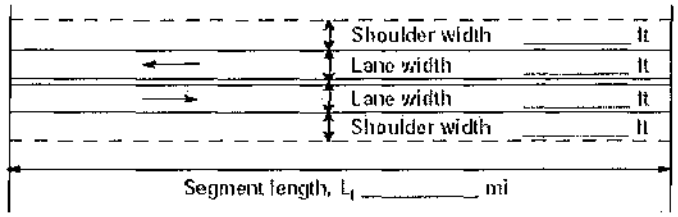
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014 + PROJECT (ALT 1)

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d	377veh/h
Opposing direction vol., V_o	465veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.3	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.988	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	434	533

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	49.9 mi/h
		Percent free flow speed, PFFS	83.4 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	428	528
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	46.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	39.0	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	64.4	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.26
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1686
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*83.4*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*428.4*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*2.95*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

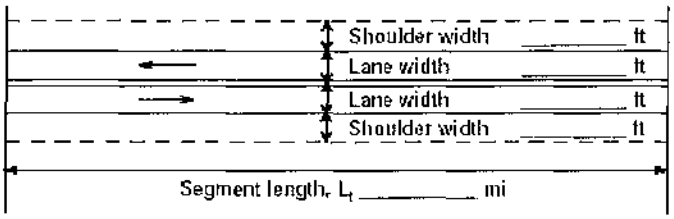
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	3/31/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014 + PROJECT (ALT 2)

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses, P_T 4 %

% Recreational vehicles, P_R 2%

Access points mi 1/mi

Analysis direction vol., V_d 466veh/h

Opposing direction vol., V_o 377veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.3
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.988
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	534	434

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	3.0 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	49.2 mi/h
		Percent free flow speed, PFFS	82.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	530	428
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	52.8	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	38.9	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	74.3	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.31
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1680
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	82.3

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*529.5*
Effective width, Wv (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.06*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

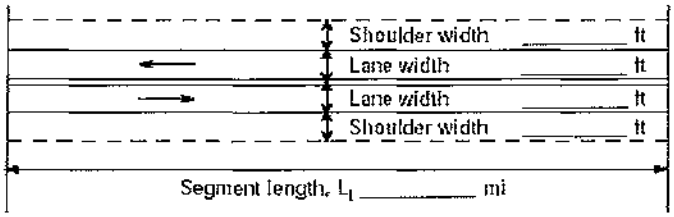
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	3/31/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	2014 + PROJECT (ALT 2)

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 377veh/h

Opposing direction vol., V_o 466veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.3	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.988	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	434	534

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	49.9 mi/h
		Percent free flow speed, PFFS	83.4 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	428	530
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	46.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	38.9	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	64.3	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.26
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1686
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	83.4

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*428.4*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*2.95*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

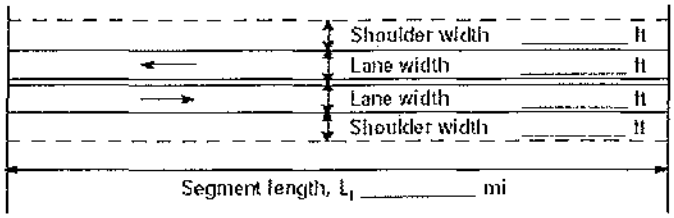
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		***Site Information***	
Analyst	*DLD*	Highway / Direction of Travel	*SR 154 NORTHBOUND*
Agency or Company	*ATE*	From/To	*N/O BASELINE*
Date Performed	*1/29/14*	Jurisdiction	*CALTRANS*
Analysis Time Period	*P.M. PEAK*	Analysis Year	*CUMULATIVE*

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF *0.88*

No-passing zone *90%*

% Trucks and Buses , P_T *4 %*

% Recreational vehicles, P_R *2%*

Access points *mi* *1/mi*

Analysis direction vol., V_d *680veh/h*

Opposing direction vol., V_o *518veh/h*

Shoulder width ft *6.0*

Lane Width ft *12.0*

Segment Length mi *1.0*

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	*1.1*	*1.1*
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	*1.0*	*1.0*
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	*0.996*	*0.996*
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	*1.00*	*1.00*
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	*776*	*591*

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	*60.0 mi/h*
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	*0.0 mi/h*
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	*0.3 mi/h*
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	*2.0 mi/h*	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	*59.8 mi/h*
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})$ $\cdot f_{np,ATS}$	*47.1 mi/h*
		Percent free flow speed, PFFS	*78.9 %*

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	*1.0*	*1.0*
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	*1.0*	*1.0*
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	*1.000*	*1.000*
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	*1.00*	*1.00*
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	*773*	*589*
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	*65.5*	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	*28.2*	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	*81.5*	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	*E*
Volume to capacity ratio, *v/c*	*0.46*
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	*1693*
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	*1700*

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*78.9*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*772.7*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.25*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

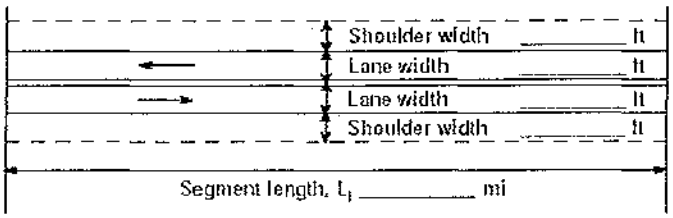
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points *mi* 1/mi

Analysis direction vol., V_d 518veh/h
Opposing direction vol., V_o 680veh/h
Shoulder width ft 6.0
Lane Width ft 12.0
Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	591	776

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.7 mi/h
		Percent free flow speed, PFFS	79.9 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	589	773
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	59.4	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	28.2	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	71.6	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.35
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*79.9*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*588.6*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.11*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

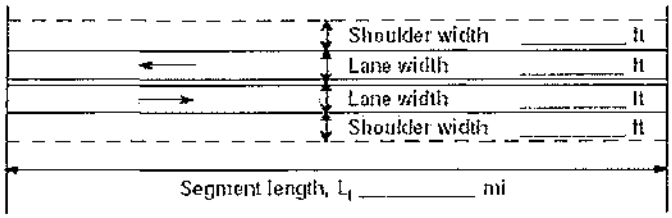
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 1)

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Show North Arrow

Analysis direction vol., V_d	685veh/h
Opposing direction vol., V_o	527veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	782	601

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.9 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})\cdot f_{np,ATS}$	47.1 mi/h
		Percent free flow speed, PFFS	78.8 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	778	599
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	66.1	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	27.8	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	81.8	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	E
Volume to capacity ratio, *v/c*	0.46
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*78.8*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*778.4*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.26*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

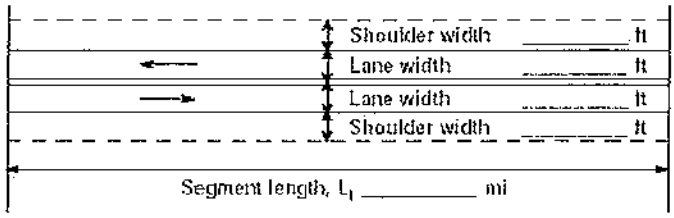
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 1)

Project Description:

Input Data



☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d	527veh/h
Opposing direction vol., V_o	685veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	601	782

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.6 mi/h
		Percent free flow speed, PFFS	79.7 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	599	778
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	60.5	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	27.8	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	72.6	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.35
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*79.7*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*598.9*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.12*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

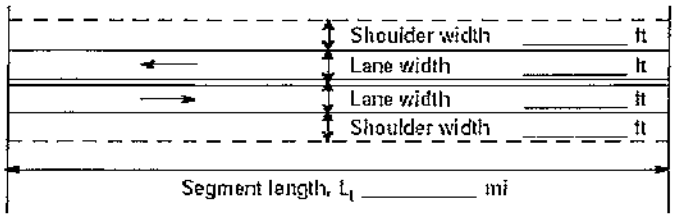
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 2)

Project Description:

Input Data



Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 686veh/h

Opposing direction vol., V_o 527veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	783	601

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.9 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.1 mi/h
		Percent free flow speed, PFFS	78.8 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	780	599
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	66.1	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	27.8	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	81.8	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	E
Volume to capacity ratio, v/c	0.46
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	78.8

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	779.5
Effective width, Ww (Eq. 15-29) ft	24.00
Effective speed factor, S_f (Eq. 15-30)	4.79
Bicycle level of service score, BLOS (Eq. 15-31)	3.26
Bicycle level of service (Exhibit 15-4)	C

Notes

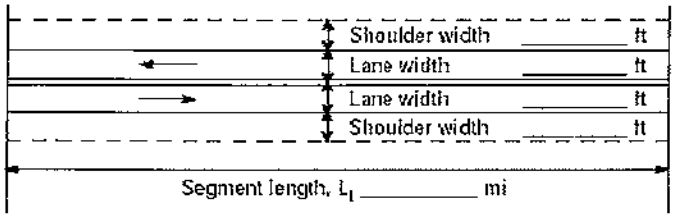
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	N/O BASELINE
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 2)

Project Description:

Input Data




Show North Arrow

☑ Class I highway ☐ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 527veh/h

Opposing direction vol., V_o 686veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	601	783

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.4 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.6 mi/h
		Percent free flow speed, PFFS	79.7 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	599	780
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	60.5	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	27.8	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	72.6	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.35
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	79.7

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*598.9*
Effective width, Wv (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.12*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

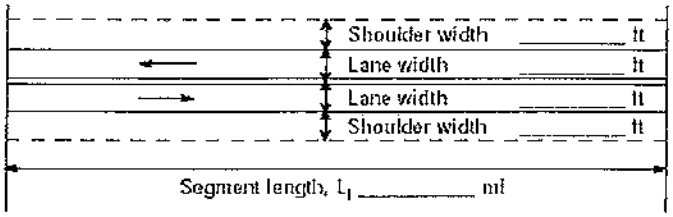
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	EXISTING

Project Description:

Input Data



☐ Class I highway ☑ Class II highway
☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points mi 1/mi

Analysis direction vol., V_d	555veh/h
Opposing direction vol., V_o	412veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	633	472

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.8 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	48.4 mi/h
		Percent free flow speed, PFFS	81.0 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	631	468
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	58.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	34.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	78.8	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.37
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*81.0*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*630.7*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.15*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

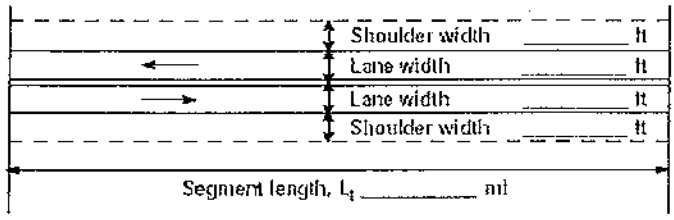
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	EXISTING

Project Description:

Input Data



Show North Arrow

☐ Class I highway ☑ Class II highway
☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points *mi* 1/mi

Analysis direction vol., V_d	412veh/h
Opposing direction vol., V_o	555veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	472	633

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, FFS=S_{FM}+0.00776(v/ $f_{HV,ATS}$)		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.8 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, ATS_d=FFS-0.00776($v_{d,ATS}$ + $v_{o,ATS}$) - $f_{np,ATS}$	49.3 mi/h
		Percent free flow speed, PFFS	82.6 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	468	631
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	50.8	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	34.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	65.5	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.28
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*82.6*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*468.2*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.00*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

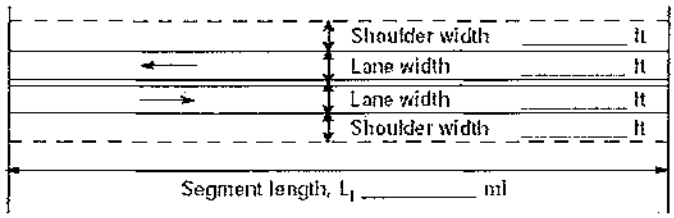
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		***Site Information***	
Analyst	*DLD*	Highway / Direction of Travel	*SR 154 NORTHBOUND*
Agency or Company	*ATE*	From/To	*S/O SR 246*
Date Performed	*1/29/14*	Jurisdiction	*CALTRANS*
Analysis Time Period	*P.M. PEAK*	Analysis Year	*YEAR 2014*

Project Description:

Input Data



☐ Class I highway ☑ Class II highway

☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF *0.88*

No-passing zone *90%*

% Trucks and Buses , P_T *4 %*

% Recreational vehicles, P_R *2%*

Access points *mi* *1/mi*

Analysis direction vol., V_d *600veh/h*

Opposing direction vol., V_o *468veh/h*

Shoulder width ft *6.0*

Lane Width ft *12.0*

Segment Length mi *1.0*

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	*1.1*	*1.2*
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	*1.0*	*1.0*
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	*0.996*	*0.992*
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	*1.00*	*1.00*
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	*685*	*536*

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	*60.0 mi/h*
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	*0.0 mi/h*
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	*0.3 mi/h*
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	*2.4 mi/h*	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	*59.8 mi/h*
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	*47.9 mi/h*
		Percent free flow speed, PFFS	*80.2 %*

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	*1.0*	*1.0*
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	*1.0*	*1.0*
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	*1.000*	*1.000*
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	*1.00*	*1.00*
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	*682*	*532*
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	*61.4*	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	*32.0*	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	*79.4*	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	*D*
Volume to capacity ratio, *v/c*	*0.40*
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	*0*
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	*1700*

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*80.2*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*681.8*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.19*
Bicycle level of service (Exhibit 15-4)	C

Notes

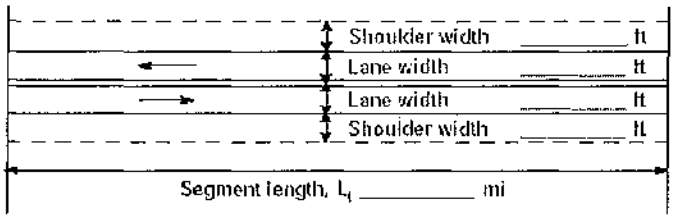
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	YEAR 2014

Project Description:

Input Data



Show North Arrow

☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d	468veh/h
Opposing direction vol., V_o	600veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	536	685

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.7 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	48.6 mi/h
		Percent free flow speed, PFFS	81.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	532	682
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	55.7	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	32.0	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	69.7	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.31
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed PFFS$_d$(Equation 15-11 - Class III only)	*81.3*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*531.8*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.06*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

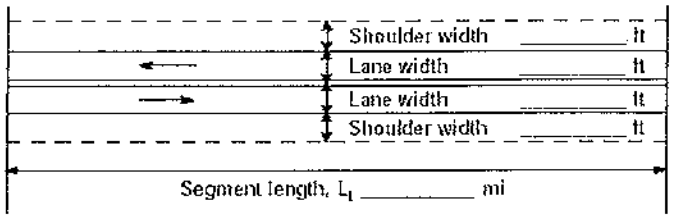
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	YEAR 2014 + PROJECT (ALT 1)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway
☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points *mi* 1/mi

Analysis direction vol., V_d 609veh/h
Opposing direction vol., V_o 473veh/h
Shoulder width ft 6.0
Lane Width ft 12.0
Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	695	542

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.3 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.8 mi/h
		Percent free flow speed, PFFS	80.0 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	692	538
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	62.7	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	31.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	80.5	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.41
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*80.0*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*692.0*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.20*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

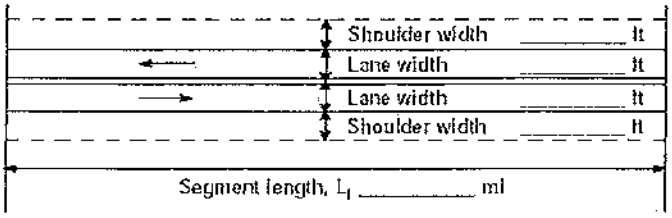
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	YEAR 2014 + PROJECT (ALT 1)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length ____ mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 473veh/h

Opposing direction vol., V_o 609veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	542	695

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.7 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	48.5 mi/h
		Percent free flow speed, PFFS	81.2 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	538	692
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	56.5	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	31.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	70.3	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.32
Capacity, $C_{d,ATS}$ (Equetion 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*81.2*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*537.5*
Effective width, Wv (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.07*
Bicycle level of service (Exhibit 15-4)	*C*
Notes	

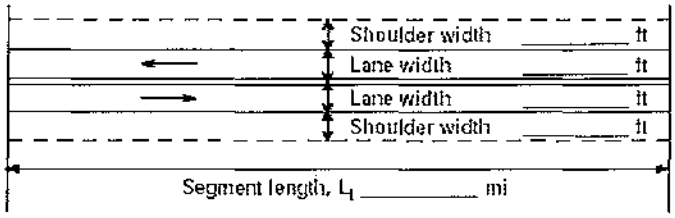
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	YEAR 2014 + PROJECT (ALT 2)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 609veh/h

Opposing direction vol., V_o 474veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.1	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.996	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	695	543

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.3 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.8 mi/h
		Percent free flow speed, PFFS	80.0 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	692	539
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	62.7	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	31.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	80.5	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, *v/c*	0.41
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	80.0

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*692.0*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.20*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

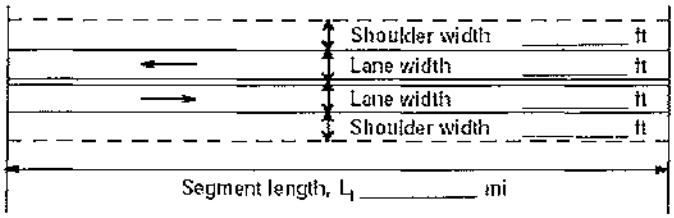
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	YEAR 2014 + PROJECT (ALT 2)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points mi 1/mi

Analysis direction vol., V_d 474veh/h

Opposing direction vol., V_o 609veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.1
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	0.996
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	543	695

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.7 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	48.5 mi/h
		Percent free flow speed, PFFS	81.1 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	539	692
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	56.6	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	31.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	70.4	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	D
Volume to capacity ratio, v/c	0.32
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1693
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	81.1

Bicycle Level of Service

4/8

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*538.6*
Effective width, Wv (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.07*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

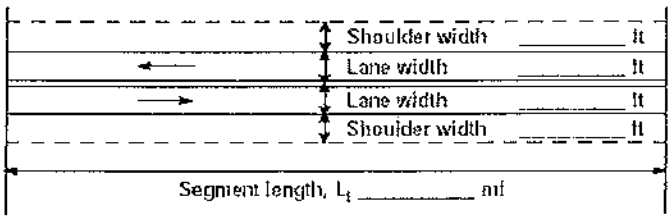
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE

Project Description:

Input Data



☐ Class I highway ☑ Class II highway
☐ Class III highway
Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points *mi* 1/mi

Analysis direction vol., V_d	798veh/h
Opposing direction vol., V_o	447veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.0	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	907	512

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, FFS=S_{FM}+0.00776(*v*/ $f_{HV,ATS}$)		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.5 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, ATS_d=FFS-0.00776($v_{d,ATS}$ + $v_{o,ATS}$) - $f_{np,ATS}$	46.2 mi/h
		Percent free flow speed, PFFS	77.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	907	508
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	70.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	86.7	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	E
Volume to capacity ratio, *v/c*	0.53
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*77.3*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*906.8*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.33*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

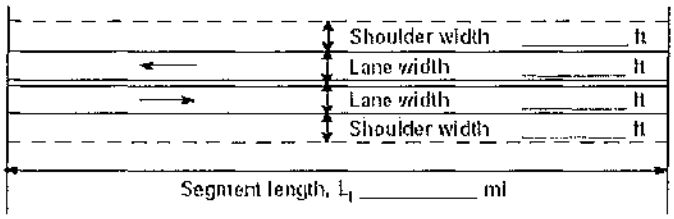
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses, P_T 4 %
% Recreational vehicles, P_R 2%
Access points mi 1/mi

Analysis direction vol., V_d	447veh/h
Opposing direction vol., V_o	798veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	1.000
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	512	907

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.2 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.5 mi/h
		Percent free flow speed, PFFS	79.5 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	508	907
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	56.5	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.6	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	65.3	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, v/c	0.30
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1700
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*79.5*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*508.0*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.04*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

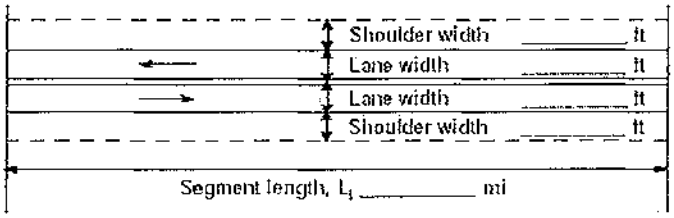
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE + PROJECT (ALT 1)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling
Grade Length mi Up/down
Peak-hour factor, PHF 0.88
No-passing zone 90%
% Trucks and Buses , P_T 4 %
% Recreational vehicles, P_R 2%
Access points *mi* 1/mi

Analysis direction vol., V_d	807veh/h
Opposing direction vol., V_o	452veh/h
Shoulder width ft	6.0
Lane Width ft	12.0
Segment Length mi	1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.0	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	917	518

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS}(Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.5 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})*f_{np,ATS}$	46.1 mi/h
		Percent free flow speed, PFFS	77.2 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	917	514
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	71.0	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.4	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	86.6	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	E
Volume to capacity ratio, *v/c*	0.54
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*77.2*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*917.0*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_t (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.34*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

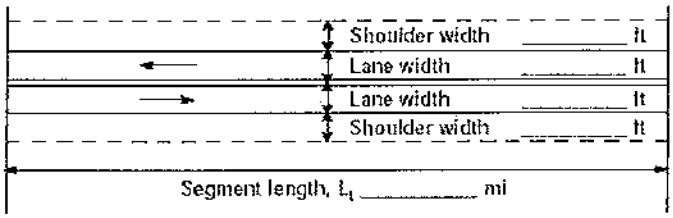
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	1/29/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 1)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 452veh/h

Opposing direction vol., V_o 807veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	1.000
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	518	917

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, FFS=S_{FM}+0.00776(*v*/ $f_{HV,ATS}$)		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.2 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, ATS_d=FFS-0.00776($v_{d,ATS}$ + $v_{o,ATS}$) - $f_{np,ATS}$	47.4 mi/h
		Percent free flow speed, PFFS	79.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T(Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i(pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	514	917
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	56.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.4	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	65.7	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.30
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1700
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700

Percent Free-Flow Speed $PFFS_d$(Equation 15-11 - Class III only)	*79.3*
Bicycle Level of Service	
Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*513.6*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.05*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

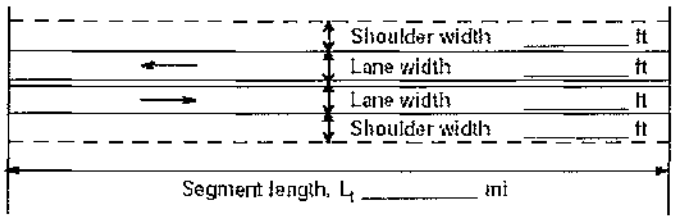
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 NORTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE + PROJECT (ALT 2)

Project Description:

Input Data



☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

Show North Arrow

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points mi 1/mi

Analysis direction vol., V_d 807veh/h

Opposing direction vol., V_o 453veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.0	1.2
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	0.992
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	917	519

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, v		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	2.5 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	46.1 mi/h
		Percent free flow speed, PFFS	77.2 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	917	515
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	71.0	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.4	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	86.6	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	E
Volume to capacity ratio, v/c	0.54
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	0
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	77.2

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*917.0*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.34*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

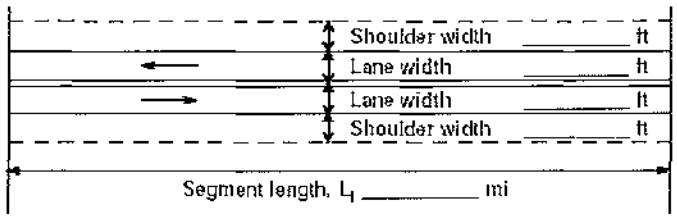
1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

DIRECTIONAL TWO-LANE HIGHWAY SEGMENT WORKSHEET

General Information		Site Information	
Analyst	DLD	Highway / Direction of Travel	SR 154 SOUTHBOUND
Agency or Company	ATE	From/To	S/O SR 246
Date Performed	4/1/14	Jurisdiction	CALTRANS
Analysis Time Period	P.M. PEAK	Analysis Year	CUMULATIVE+PROJECT (ALT 2)

Project Description:

Input Data



Show North Arrow

☐ Class I highway ☑ Class II highway ☐ Class III highway

Terrain ☑ Level ☐ Rolling

Grade Length mi Up/down

Peak-hour factor, PHF 0.88

No-passing zone 90%

% Trucks and Buses , P_T 4 %

% Recreational vehicles, P_R 2%

Access points *mi* 1/mi

Analysis direction vol., V_d 453veh/h

Opposing direction vol., V_o 807veh/h

Shoulder width ft 6.0

Lane Width ft 12.0

Segment Length mi 1.0

Average Travel Speed

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-11 or 15-12)	1.2	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-11 or 15-13)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV,ATS}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	0.992	1.000
Grade adjustment factor[1], $f_{g,ATS}$ (Exhibit 15-9)	1.00	1.00
Demand flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{g,ATS}*f_{HV,ATS})$	519	917

Free-Flow Speed from Field Measurement		Estimated Free-Flow Speed	
Mean speed of sample[3], S_{FM}		Base free-flow speed[4], BFFS	60.0 mi/h
Total demand flow rate, both directions, *v*		Adj. for lane and shoulder width,[4] f_{LS} (Exhibit 15-7)	0.0 mi/h
Free-flow speed, $FFS=S_{FM}+0.00776(v/f_{HV,ATS})$		Adj. for access points[4], f_A (Exhibit 15-8)	0.3 mi/h
Adj. for no-passing zones, $f_{np,ATS}$ (Exhibit 15-15)	1.2 mi/h	Free-flow speed, FFS (FSS=BFFS-f_{LS}-f_A)	59.8 mi/h
		Average travel speed, $ATS_d=FFS-0.00776(v_{d,ATS}+v_{o,ATS})-f_{np,ATS}$	47.4 mi/h
		Percent free flow speed, PFFS	79.3 %

Percent Time-Spent-Following

	Analysis Direction (d)	Opposing Direction (o)
Passenger-car equivalents for trucks, E_T (Exhibit 15-18 or 15-19)	1.0	1.0
Passenger-car equivalents for RVs, E_R (Exhibit 15-18 or 15-19)	1.0	1.0
Heavy-vehicle adjustment factor, $f_{HV}=1/(1+P_T(E_T-1)+P_R(E_R-1))$	1.000	1.000
Grade adjustment factor[1], $f_{g,PTSF}$ (Exhibit 15-16 or Ex 15-17)	1.00	1.00
Directional flow rate[2], v_i (pc/h) $v_i=V_i/(PHF*f_{HV,PTSF}*f_{g,PTSF})$	515	917
Base percent time-spent-following[4], $BPTSF_d(\%)=100(1-e^{av_d^b})$	56.9	
Adj. for no-passing zone, $f_{np,PTSF}$ (Exhibit 15-21)	24.4	
Percent time-spent-following, $PTSF_d(\%)=BPTSF_d+f_{np,PTSF}*(v_{d,PTSF}/v_{d,PTSF}+v_{o,PTSF})$	65.7	

Level of Service and Other Performance Measures

Level of service, LOS (Exhibit 15-3)	C
Volume to capacity ratio, *v/c*	0.30
Capacity, $C_{d,ATS}$ (Equation 15-12) pc/h	1700
Capacity, $C_{d,PTSF}$ (Equation 15-13) pc/h	1700
Percent Free-Flow Speed $PFFS_d$ (Equation 15-11 - Class III only)	79.3

Bicycle Level of Service

Directional demand flow rate in outside lane, v_{OL} (Eq. 15-24) veh/h	*514.8*
Effective width, Ww (Eq. 15-29) ft	*24.00*
Effective speed factor, S_f (Eq. 15-30)	*4.79*
Bicycle level of service score, BLOS (Eq. 15-31)	*3.05*
Bicycle level of service (Exhibit 15-4)	*C*

Notes

1. Note that the adjustment factor for level terrain is 1.00,as level terrain is one of the base conditions. For the purpose of grade adjustment, specific downgrade segments are treated as level terrain.
2. If v_i(v_d or v_o) >=1,700 pc/h, terminate analysis--the LOS is F.
3. For the analysis direction only and for v>200 veh/h.
4. For the analysis direction only
5. Exhibit 15-20 provides coefficients a and b for Equation 15-10.
6. Use alternative Exhibit 15-14 if some trucks operate at crawl speeds on a specific downgrade.

INTERSECTION LEVEL OF SERVICE CALCULATION WORKSHEETS

Reference 1	SR 154/U.S. 101 SB
Reference 2	SR 154/U.S. 101 NB
Reference 3	SR 154/Grand Avenue
Reference 4	SR 154/Roblar Avenue
Reference 5	SR 154/Edison Street
Reference 6	SR 246/Alisal Road
Reference 7	SR 246/Alamo Pintado Road
Reference 8	SR 246/Refugio Road
Reference 9	SR 246/Edison Street
Reference 10	SR 246/SR 154

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_EX_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	3/21/2012	Analysis Year	EXISTING
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	67	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	408	2	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			67				410	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.06				0.36	
hd, final value (s)			5.14				4.35	
x, final value			0.10				0.50	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.1				2.4	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			317				660	
Delay (s/veh)			8.68				11.62	
LOS			A				B	
Approach: Delay (s/veh)			8.68				11.62	
LOS			A				B	
Intersection Delay (s/veh)	11.20							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_2014_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	NEAR-TERM (YEAR 2014)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	69	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	434	2	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			69				436	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, Initial value (s)			3.20				3.20	
x, initial			0.06				0.39	
hd, final value (s)			5.20				4.36	
x, final value			0.10				0.53	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.2				2.4	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			319				686	
Delay (s/veh)			8.77				12.22	
LOS			A				B	
Approach: Delay (s/veh)			8.77				12.22	
LOS			A				B	
Intersection Delay (s/veh)	11.75							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information

Analyst	*MMF*
Agency/Co.	*ATE*
Date Performed	*1/29/14*
Analysis Time Period	*A.M. PEAK HOUR*

Site Information

Intersection	*01_2014+ALT 1_AM*
Jurisdiction	*SANTA BARBARA COUNTY*
Analysis Year	*2014+PROJECT (ALT. 1)*

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 154* | North/South Street: *U.S. 101 SB RAMPS*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*69*	*0*	*0*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*437*	*2*	*0*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			*L*				*LT*	
PHF			*1.00*				*1.00*	
Flow Rate (veh/h)			*69*				*439*	
% Heavy Vehicles			*4*				*4*	
No. Lanes	*0*		*1*		*0*		*1*	
Geometry Group			*1*				*1*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			*1.0*				*1.0*	
Prop. Right-Turns			*0.0*				*0.0*	
Prop. Heavy Vehicle			*0.0*				*0.0*	
hLT-adj			*0.2*	*0.2*			*0.2*	*0.2*
hRT-adj			*-0.6*	*-0.6*			*-0.6*	*-0.6*
hHV-adj			*1.7*	*1.7*			*1.7*	*1.7*
hadj, computed			*0.3*				*0.3*	

Departure Headway and Service Time

hd, initial value (s)			*3.20*				*3.20*	
x, initial			*0.06*				*0.39*	
hd, final value (s)			*5.21*				*4.36*	
x, final value			*0.10*				*0.53*	
Move-up time, m (s)			*2.0*				*2.0*	
Service Time, t_s (s)			*3.2*				*2.4*	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			*319*				*689*	
Delay (s/veh)			*8.78*				*12.29*	
LOS			*A*				*B*	
Approach: Delay (s/veh)			*8.78*				*12.29*	
LOS			*A*				*B*	
Intersection Delay (s/veh)	*11.81*							
Intersection LOS	*B*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*01_2014+ALT 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 154* | North/South Street: *U.S. 101 SB RAMPS*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*69*	*0*	*0*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*438*	*2*	*0*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			*L*				*LT*	
PHF			*1.00*				*1.00*	
Flow Rate (veh/h)			*69*				*440*	
% Heavy Vehicles			*4*				*4*	
No. Lanes	*0*		*1*		*0*		*1*	
Geometry Group			*1*				*1*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			*1.0*				*1.0*	
Prop. Right-Turns			*0.0*				*0.0*	
Prop. Heavy Vehicle			*0.0*				*0.0*	
hLT-adj			*0.2*	*0.2*			*0.2*	*0.2*
hRT-adj			*-0.6*	*-0.6*			*-0.6*	*-0.6*
hHV-adj			*1.7*	*1.7*			*1.7*	*1.7*
hadj, computed			*0.3*				*0.3*	

Departure Headway and Service Time

hd, initial value (s)			*3.20*				*3.20*	
x, initial			*0.06*				*0.39*	
hd, final value (s)			*5.21*				*4.36*	
x, final value			*0.10*				*0.53*	
Move-up time, m (s)			*2.0*				*2.0*	
Service Time, t_s (s)			*3.2*				*2.4*	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			*319*				*690*	
Delay (s/veh)			*8.79*				*12.31*	
LOS			*A*				*B*	
Approach: Delay (s/veh)			*8.79*				*12.31*	
LOS			*A*				*B*	
Intersection Delay (s/veh)	*11.84*							
Intersection LOS	*B*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*01_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 154* | North/South Street: *U.S. 101 SB RAMPS*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*67*	*2*	*0*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*0*	*515*	*2*	*2*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			*L*				*LTR*	
PHF			*1.00*				*1.00*	
Flow Rate (veh/h)			*67*				*519*	
% Heavy Vehicles			*4*				*4*	
No. Lanes	*0*		*1*		*0*		*1*	
Geometry Group			*1*				*1*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			*1.0*				*1.0*	
Prop. Right-Turns			*0.0*				*0.0*	
Prop. Heavy Vehicle			*0.0*				*0.0*	
hLT-adj			*0.2*	*0.2*			*0.2*	*0.2*
hRT-adj			*-0.6*	*-0.6*			*-0.6*	*-0.6*
hHV-adj			*1.7*	*1.7*			*1.7*	*1.7*
hadj, computed			*0.3*				*0.3*	

Departure Headway and Service Time

hd, initial value (s)			*3.20*				*3.20*	
x, initial			*0.06*				*0.46*	
hd, final value (s)			*5.40*				*4.36*	
x, final value			*0.10*				*0.63*	
Move-up time, m (s)			*2.0*				*2.0*	
Service Time, t_s (s)			*3.4*				*2.4*	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			*317*				*769*	
Delay (s/veh)			*9.00*				*14.66*	
LOS			*A*				*B*	
Approach: Delay (s/veh)			*9.00*				*14.66*	
LOS			*A*				*B*	
Intersection Delay (s/veh)	*14.01*							
Intersection LOS	*B*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_CU+PR (ALT. 1)_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE+PR (ALT.1)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	67	2	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	518	2	2
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LTR	
PHF			1.00				1.00	
Flow Rate (veh/h)			67				522	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.06				0.46	
hd, final value (s)			5.40				4.36	
x, final value			0.10				0.63	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.4				2.4	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			317				772	
Delay (s/veh)			9.01				14.77	
LOS			A				B	
Approach: Delay (s/veh)			9.01				14.77	
LOS			A				B	
Intersection Delay (s/veh)	14.12							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_CU+PR (ALT. 2)_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	CUMULATIVE+PR (ALT. 2)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	67	2	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	519	2	2
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LTR	
PHF			1.00				1.00	
Flow Rate (veh/h)			67				523	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.06				0.46	
hd, final value (s)			5.41				4.36	
x, final value			0.10				0.63	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.4				2.4	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			317				773	
Delay (s/veh)			9.01				14.81	
LOS			A				B	
Approach: Delay (s/veh)			9.01				14.81	
LOS			A				B	
Intersection Delay (s/veh)	14.15							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_EX_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	3/21/2012	Analysis Year	EXISTING
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	146	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	304	1	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			146				305	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.13				0.27	
hd, final value (s)			4.92				4.56	
x, final value			0.20				0.39	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			2.9				2.6	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			396				555	
Delay (s/veh)			9.15				10.42	
LOS			A				B	
Approach: Delay (s/veh)			9.15				10.42	
LOS			A				B	
Intersection Delay (s/veh)	10.01							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_2014_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	NEAR-TERM (YEAR 2014)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	150	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	337	1	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			150				338	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.13				0.30	
hd, final value (s)			5.01				4.57	
x, final value			0.21				0.43	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.0				2.6	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			400				588	
Delay (s/veh)			9.32				11.01	
LOS			A				B	
Approach: Delay (s/veh)			9.32				11.01	
LOS			A				B	
Intersection Delay (s/veh)	10.49							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_2014+ALT. 1_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	2014+PROJECT (ALT. 1)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	150	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	346	1	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			150				347	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, Initial value (s)			3.20				3.20	
x, initial			0.13				0.31	
hd, final value (s)			5.03				4.58	
x, final value			0.21				0.44	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.0				2.6	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			400				597	
Delay (s/veh)			9.36				11.18	
LOS			A				B	
Approach: Delay (s/veh)			9.36				11.18	
LOS			A				B	
Intersection Delay (s/veh)	10.63							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_2014+ALT. 2_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	2014+PROJECT (ALT. 2)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	150	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	346	1	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration			L				LT	
PHF			1.00				1.00	
Flow Rate (veh/h)			150				347	
% Heavy Vehicles			4				4	
No. Lanes	0		1		0		1	
Geometry Group			1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns			1.0				1.0	
Prop. Right-Turns			0.0				0.0	
Prop. Heavy Vehicle			0.0				0.0	
hLT-adj			0.2	0.2			0.2	0.2
hRT-adj			-0.6	-0.6			-0.6	-0.6
hHV-adj			1.7	1.7			1.7	1.7
hadj, computed			0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)			3.20				3.20	
x, initial			0.13				0.31	
hd, final value (s)			5.03				4.58	
x, final value			0.21				0.44	
Move-up time, m (s)			2.0				2.0	
Service Time, t_s (s)			3.0				2.6	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)			400				597	
Delay (s/veh)			9.36				11.18	
LOS			A				B	
Approach: Delay (s/veh)			9.36				11.18	
LOS			A				B	
Intersection Delay (s/veh)	10.63							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_CU_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE (YEAR 2030)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	2	136	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	397	2	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		L				LT	
PHF	1.00		1.00				1.00	
Flow Rate (veh/h)	2		136				399	
% Heavy Vehicles	0		4				4	
No. Lanes	1		1		0		1	
Geometry Group	1		1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.0		1.0				1.0	
Prop. Right-Turns	1.0		0.0				0.0	
Prop. Heavy Vehicle	0.0		0.0				0.0	
hLT-adj	0.2	0.2	0.2	0.2			0.2	0.2
hRT-adj	-0.6	-0.6	-0.6	-0.6			-0.6	-0.6
hHV-adj	1.7	1.7	1.7	1.7			1.7	1.7
hadj, computed	-0.6		0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20				3.20	
x, initial	0.00		0.12				0.35	
hd, final value (s)	4.49		5.16				4.55	
x, final value	0.00		0.20				0.50	
Move-up time, m (s)	2.0		2.0				2.0	
Service Time, t_s (s)	2.5		3.2				2.5	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	252		386				649	
Delay (s/veh)	7.50		9.41				12.14	
LOS	A		A				B	
Approach: Delay (s/veh)	7.50		9.41				12.14	
LOS	A		A				B	
Intersection Delay (s/veh)	11.43							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_CU+PR (ALT. 1)_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE+PR (ALT.1)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	2	136	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	406	2	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		L				LT	
PHF	1.00		1.00				1.00	
Flow Rate (veh/h)	2		136				408	
% Heavy Vehicles	0		4				4	
No. Lanes	1		1		0		1	
Geometry Group	1		1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.0		1.0				1.0	
Prop. Right-Turns	1.0		0.0				0.0	
Prop. Heavy Vehicle	0.0		0.0				0.0	
hLT-adj	0.2	0.2	0.2	0.2			0.2	0.2
hRT-adj	-0.6	-0.6	-0.6	-0.6			-0.6	-0.6
hHV-adj	1.7	1.7	1.7	1.7			1.7	1.7
hadj, computed	-0.6		0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20				3.20	
x, initial	0.00		0.12				0.36	
hd, final value (s)	4.51		5.19				4.55	
x, final value	0.00		0.20				0.52	
Move-up time, m (s)	2.0		2.0				2.0	
Service Time, t_s (s)	2.5		3.2				2.5	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	252		386				658	
Delay (s/veh)	7.52		9.45				12.36	
LOS	A		A				B	
Approach: Delay (s/veh)	7.52		9.45				12.36	
LOS	A		A				B	
Intersection Delay (s/veh)	11.62							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	01_CU+PR (ALT. 2)_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	CUMULATIVE+PR (ALT. 2)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154 | North/South Street: U.S. 101 SB RAMPS

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	2	136	0	0
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	0	0	0	406	2	0
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		L				LT	
PHF	1.00		1.00				1.00	
Flow Rate (veh/h)	2		136				408	
% Heavy Vehicles	0		4				4	
No. Lanes	1		1		0		1	
Geometry Group	1		1				1	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.0		1.0				1.0	
Prop. Right-Turns	1.0		0.0				0.0	
Prop. Heavy Vehicle	0.0		0.0				0.0	
hLT-adj	0.2	0.2	0.2	0.2			0.2	0.2
hRT-adj	-0.6	-0.6	-0.6	-0.6			-0.6	-0.6
hHV-adj	1.7	1.7	1.7	1.7			1.7	1.7
hadj, computed	-0.6		0.3				0.3	

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20				3.20	
x, initial	0.00		0.12				0.36	
hd, final value (s)	4.51		5.19				4.55	
x, final value	0.00		0.20				0.52	
Move-up time, m (s)	2.0		2.0				2.0	
Service Time, t_s (s)	2.5		3.2				2.5	

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	252		386				658	
Delay (s/veh)	7.52		9.45				12.36	
LOS	A		A				B	
Approach: Delay (s/veh)	7.52		9.45				12.36	
LOS	A		A				B	
Intersection Delay (s/veh)	11.62							
Intersection LOS	B							

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*A.M. PEAK HOUR*		
Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*SR 154*	North/South Street:	*U.S. 101 NB RAMPS*
Intersection Orientation:	*East-West*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*1*	*421*			*68*	*210*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*421*	*0*	*0*	*68*	*210*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*107*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*107*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*1*			*107*				
C (m) (veh/h)	*1273*			*628*				
v/c	*0.00*			*0.17*				
95% queue length	*0.00*			*0.61*				
Control Delay (s/veh)	*7.8*			*11.9*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*11.9*					
Approach LOS	--	--	*B*					

AWD = 11.9 sec. / LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*1*	*431*			*68*	*214*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*431*	*0*	*0*	*68*	*214*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*107*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*107*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*1*			*107*				
C (m) (veh/h)	*1269*			*620*				
v/c	*0.00*			*0.17*				
95% queue length	*0.00*			*0.62*				
Control Delay (s/veh)	*7.8*			*12.0*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--		*12.0*				
Approach LOS	--	--		*B*				

AWD = 12.0 SEC = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014+ALT. 1_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*1*	*434*			*68*	*222*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*434*	*0*	*0*	*68*	*222*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*107*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*107*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*1*			*107*				
C (m) (veh/h)	*1260*			*618*				
v/c	*0.00*			*0.17*				
95% queue length	*0.00*			*0.63*				
Control Delay (s/veh)	*7.9*			*12.0*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*12.0*					
Approach LOS	--	--	*B*					

AWD = 12.0 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014+ALT. 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*SR 154*
North/South Street:	*U.S. 101 NB RAMPS*
Intersection Orientation:	*East-West*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*1*	*435*			*68*	*222*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*435*	*0*	*0*	*68*	*222*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*107*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*107*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*1*			*107*				
C (m) (veh/h)	*1260*			*617*				
v/c	*0.00*			*0.17*				
95% queue length	*0.00*			*0.63*				
Control Delay (s/veh)	*7.9*			*12.1*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*12.1*					
Approach LOS	--	--	*B*					

AWD = 12.1 SEC = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*0*	*496*			*84*	*252*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*496*	*0*	*0*	*84*	*252*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*148*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*148*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*0*			*148*				
C (m) (veh/h)	*1212*			*570*				
v/c	*0.00*			*0.26*				
95% queue length	*0.00*			*1.05*				
Control Delay (s/veh)	*8.0*			*13.5*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*13.5*					
Approach LOS	--	--	*B*					

Avg = 13.5 sec = Case B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU+PR (ALT. 1)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*0*	*499*			*84*	*260*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*499*	*0*	*0*	*84*	*260*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*148*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*148*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*0*			*148*				
C (m) (veh/h)	*1204*			*568*				
v/c	*0.00*			*0.26*				
95% queue length	*0.00*			*1.05*				
Control Delay (s/veh)	*8.0*			*13.6*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*13.6*					
Approach LOS	--	--	*B*					

AWD = 13.6 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU+PR (ALT. 2)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*0*	*500*			*84*	*260*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*500*	*0*	*0*	*84*	*260*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*0*	*0*	*148*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*0*	*0*	*148*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*0*			*148*				
C (m) (veh/h)	*1204*			*567*				
v/c	*0.00*			*0.26*				
95% queue length	*0.00*			*1.05*				
Control Delay (s/veh)	*8.0*			*13.6*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--		*13.6*				
Approach LOS	--	--		*B*				

AWD = 13.6 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_EX_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*3*	*293*			*137*	*450*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*293*	*0*	*0*	*137*	*450*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*1*	*0*	*70*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*0*	*70*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*3*			*71*				
C (m) (veh/h)	*978*			*734*				
v/c	*0.00*			*0.10*				
95% queue length	*0.01*			*0.32*				
Control Delay (s/veh)	*8.7*			*10.4*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--		*10.4*				
Approach LOS	--	--		*B*				

AWD = 10.3 sec. / LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*3*	*326*			*141*	*498*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*326*	*0*	*0*	*141*	*498*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*1*	*0*	*73*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*0*	*73*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*3*			*74*				
C (m) (veh/h)	*935*			*703*				
v/c	*0.00*			*0.11*				
95% queue length	*0.01*			*0.35*				
Control Delay (s/veh)	*8.9*			*10.7*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*10.7*					
Approach LOS	--	--	*B*					

Avg = 10.6 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014+ALT. 1_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*3*	*335*			*141*	*503*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*335*	*0*	*0*	*141*	*503*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*1*	*0*	*73*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*0*	*73*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*3*			*74*				
C (m) (veh/h)	*931*			*694*				
v/c	*0.00*			*0.11*				
95% queue length	*0.01*			*0.36*				
Control Delay (s/veh)	*8.9*			*10.8*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*10.8*					
Approach LOS	--	--	*B*					

AWD = 10.7 sec = Cat B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_2014+ALT. 2_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*3*	*335*			*141*	*504*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*335*	*0*	*0*	*141*	*504*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*1*	*0*	*73*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*1*	*0*	*73*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*3*			*74*				
C (m) (veh/h)	*931*			*694*				
v/c	*0.00*			*0.11*				
95% queue length	*0.01*			*0.36*				
Control Delay (s/veh)	*8.9*			*10.8*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*10.8*					
Approach LOS	--	--	*B*					

AWD = 10.7 SEC = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*4*	*378*			*126*	*619*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*4*	*378*	*0*	*0*	*126*	*619*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*3*	*0*	*108*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*0*	*108*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*4*			*111*				
C (m) (veh/h)	*854*			*647*				
v/c	*0.00*			*0.17*				
95% queue length	*0.01*			*0.62*				
Control Delay (s/veh)	*9.2*			*11.7*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*11.7*					
Approach LOS	--	--	*B*					

AWD = 11.6 Sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU+PR (ALT. 1)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*4*	*387*			*126*	*624*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*4*	*387*	*0*	*0*	*126*	*624*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*3*	*0*	*108*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*0*	*108*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*4*			*111*				
C (m) (veh/h)	*850*			*640*				
v/c	*0.00*			*0.17*				
95% queue length	*0.01*			*0.63*				
Control Delay (s/veh)	*9.3*			*11.8*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--		*11.8*				
Approach LOS	--	--		*B*				

Avg = 11.7 sec < Crit 15

89

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*02_CU+PR (ALT. 2)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *U.S. 101 NB RAMPS*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*4*	*387*			*126*	*625*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*4*	*387*	*0*	*0*	*126*	*625*
Percent Heavy Vehicles	*4*	--	--	*0*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration	*LT*					*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*3*	*0*	*108*			
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*3*	*0*	*108*	*0*	*0*	*0*
Percent Heavy Vehicles	*4*	*4*	*4*	*0*	*0*	*0*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*N*	
Storage		*0*			*0*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*0*	*0*
Configuration		*LTR*				

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*LT*			*LTR*				
v (veh/h)	*4*			*111*				
C (m) (veh/h)	*849*			*640*				
v/c	*0.00*			*0.17*				
95% queue length	*0.01*			*0.63*				
Control Delay (s/veh)	*9.3*			*11.8*				
LOS	*A*			*B*				
Approach Delay (s/veh)	--	--	*11.8*					
Approach LOS	--	--	*B*					

AWD = 11.7 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_EX_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*A.M. PEAK HOUR*		
Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*SR 154*	North/South Street:	*GRAND AVENUE*
Intersection Orientation:	*East-West*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*15*	*358*	*49*	*9*	*209*	*32*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*15*	*358*	*49*	*9*	*209*	*32*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*33*	*29*	*29*	*23*	*25*	*4*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*33*	*29*	*29*	*23*	*25*	*4*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*15*	*9*		*91*			*52*	
C (m) (veh/h)	*1314*	*1141*		*520*			*369*	
v/c	*0.01*	*0.01*		*0.17*			*0.14*	
95% queue length	*0.03*	*0.02*		*0.63*			*0.49*	
Control Delay (s/veh)	*7.8*	*8.2*		*15.2*			*16.7*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*15.2*			*16.7*		
Approach LOS	--	--	*C*			*C*		

AWD = 14.6 sec. / LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*15*	*377*	*58*	*18*	*224*	*32*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*15*	*377*	*58*	*18*	*224*	*32*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*15*	*18*		*107*			*52*	
C (m) (veh/h)	*1297*	*1114*		*489*			*333*	
v/c	*0.01*	*0.02*		*0.22*			*0.16*	
95% queue length	*0.04*	*0.05*		*0.84*			*0.55*	
Control Delay (s/veh)	*7.8*	*8.3*		*16.5*			*18.2*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*16.5*			*18.2*		
Approach LOS	--	--	*C*			*C*		

Avg = 15.5 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014+ALT. 1_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*15*	*380*	*58*	*18*	*232*	*32*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*15*	*380*	*58*	*18*	*232*	*32*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*15*	*18*		*107*			*52*	
C (m) (veh/h)	*1289*	*1111*		*483*			*326*	
v/c	*0.01*	*0.02*		*0.22*			*0.16*	
95% queue length	*0.04*	*0.05*		*0.85*			*0.57*	
Control Delay (s/veh)	*7.8*	*8.3*		*16.6*			*18.5*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*16.6*			*18.5*		
Approach LOS	--	--	*C*			*C*		

AWD = 15.6 sec/veh (LOS C)

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014+ALT. 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*SR 154*
North/South Street:	*GRAND AVENUE*
Intersection Orientation:	*East-West*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*15*	*381*	*58*	*18*	*232*	*32*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*15*	*381*	*58*	*18*	*232*	*32*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*41*	*29*	*37*	*23*	*25*	*4*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*15*	*18*		*107*			*52*	
C (m) (veh/h)	*1289*	*1110*		*482*			*326*	
v/c	*0.01*	*0.02*		*0.22*			*0.16*	
95% queue length	*0.04*	*0.05*		*0.85*			*0.57*	
Control Delay (s/veh)	*7.8*	*8.3*		*16.7*			*18.5*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*16.7*			*18.5*		
Approach LOS	--	--	*C*			*C*		

AWD = 15.7 Sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*	
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	19	600	38	4	317	34
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	19	600	38	4	317	34
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	44	24	25	23	25	4
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	44	24	25	23	25	4
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)	0			0		
Flared Approach		Y			Y	
Storage		2			2	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	19	4		93			52	
C (m) (veh/h)	1197	936		282			221	
v/c	0.02	0.00		0.33			0.24	
95% queue length	0.05	0.01		1.45			0.91	
Control Delay (s/veh)	8.1	8.9		26.2			26.7	
LOS	A	A		D			D	
Approach Delay (s/veh)	--	--	26.2			26.7		
Approach LOS	--	--	D			D		

 HCS+TM Version 5.6 Generated: 1/29/2014 9:14 AM

AWD = 23.9 Sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_CU+PR (ALT. 1)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*19*	*603*	*38*	*4*	*325*	*34*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*19*	*603*	*38*	*4*	*325*	*34*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*44*	*24*	*25*	*23*	*25*	*4*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*44*	*24*	*25*	*23*	*25*	*4*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*19*	*4*		*93*			*52*	
C (m) (veh/h)	*1189*	*934*		*276*			*218*	
v/c	*0.02*	*0.00*		*0.34*			*0.24*	
95% queue length	*0.05*	*0.01*		*1.50*			*0.93*	
Control Delay (s/veh)	*8.1*	*8.9*		*26.7*			*27.1*	
LOS	*A*	*A*		*D*			*D*	
Approach Delay (s/veh)	--	--	*26.7*			*27.1*		
Approach LOS	--	--	*D*			*D*		

AWD = 24.3 SEC = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	03_CU+PR (ALT. 2)_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	CUMULATIVE+PR (ALT. 2)
Analysis Time Period	A.M. PEAK HOUR		

Project Description #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 154	North/South Street: GRAND AVENUE
Intersection Orientation: East-West	Study Period (hrs): 1.00

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	19	604	38	4	325	34
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	19	604	38	4	325	34
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	44	24	25	23	25	4
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	44	24	25	23	25	4
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		Y			Y	
Storage		2			2	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	19	4		93			52	
C (m) (veh/h)	1189	933		276			218	
v/c	0.02	0.00		0.34			0.24	
95% queue length	0.05	0.01		1.50			0.93	
Control Delay (s/veh)	8.1	8.9		26.7			27.1	
LOS	A	A		D			D	
Approach Delay (s/veh)	--	--	26.7			27.1		
Approach LOS	--	--	D			D		

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Avg = 24.3 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_EX_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*9*	*267*	*51*	*18*	*409*	*16*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*9*	*267*	*51*	*18*	*409*	*16*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*47*	*20*	*23*	*11*	*28*	*13*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*47*	*20*	*23*	*11*	*28*	*13*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*9*	*18*		*90*			*52*	
C (m) (veh/h)	*1124*	*1231*		*387*			*404*	
v/c	*0.01*	*0.01*		*0.23*			*0.13*	
95% queue length	*0.02*	*0.04*		*0.90*			*0.44*	
Control Delay (s/veh)	*8.2*	*8.0*		*18.4*			*16.7*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*18.4*			*16.7*		
Approach LOS	--	--	C			*C*		

AWD = 16.2 sec. / LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*9*	*291*	*64*	*30*	*439*	*16*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*9*	*291*	*64*	*30*	*439*	*16*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*64*	*20*	*40*	*11*	*28*	*13*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*64*	*20*	*40*	*11*	*28*	*13*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*9*	*30*		*124*			*52*	
C (m) (veh/h)	*1095*	*1193*		*365*			*348*	
v/c	*0.01*	*0.03*		*0.34*			*0.15*	
95% queue length	*0.02*	*0.08*		*1.52*			*0.53*	
Control Delay (s/veh)	*8.3*	*8.1*		*21.6*			*18.7*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*21.6*			*18.7*		
Approach LOS	--	--	*C*			*C*		

AWD = 18.5 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014+ALT. 1_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	9	300	64	30	444	16
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	9	300	64	30	444	16
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	64	20	40	11	28	13
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	64	20	40	11	28	13
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)	0			0		
Flared Approach		Y			Y	
Storage		2			2	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	9	30		124			52	
C (m) (veh/h)	1091	1184		357			341	
v/c	0.01	0.03		0.35			0.15	
95% queue length	0.02	0.08		1.58			0.54	
Control Delay (s/veh)	8.3	8.1		22.1			19.0	
LOS	A	A		C			C	
Approach Delay (s/veh)	--	--	22.1			19.0		
Approach LOS	--	--	C			C		

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AWD= [illegible]

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_2014+ALT. 2_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 154*	North/South Street: *GRAND AVENUE*
Intersection Orientation: *East-West*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*9*	*300*	*64*	*30*	*445*	*16*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*9*	*300*	*64*	*30*	*445*	*16*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*64*	*20*	*40*	*11*	*28*	*13*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*64*	*20*	*40*	*11*	*28*	*13*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*9*	*30*		*124*			*52*	
C (m) (veh/h)	*1090*	*1184*		*356*			*340*	
v/c	*0.01*	*0.03*		*0.35*			*0.15*	
95% queue length	*0.02*	*0.08*		*1.58*			*0.54*	
Control Delay (s/veh)	*8.3*	*8.1*		*22.2*			*19.0*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*22.2*			*19.0*		
Approach LOS	--	--	*C*			*C*		

AWD = 18.9 SEC = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	03_CU_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE (YEAR 2030)
Analysis Time Period	P.M. PEAK HOUR		

Project Description #12018 - CHUMASH CAMP 4 PROJECT	
East/West Street: SR 154	North/South Street: GRAND AVENUE
Intersection Orientation: East-West	Study Period (hrs): 1.00

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	15	577	39	11	716	25
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	15	577	39	11	716	25
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	76	44	24	5	51	3
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	76	44	24	5	51	3
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		Y			Y	
Storage		2			2	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	15	11		144			59	
C (m) (veh/h)	857	954		110			135	
v/c	0.02	0.01		1.31			0.44	
95% queue length	0.05	0.03		25.48			2.20	
Control Delay (s/veh)	9.3	8.8		709.0			52.4	
LOS	A	A		F			F	
Approach Delay (s/veh)	--	--	709.0			52.4		
Approach LOS	--	--	F			F		

 HCS+™ Version 5.6 Generated: 1/29/2014 9:19 AM

AWD = 780 sec = LOS F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	03_CU+PR (ALT. 1)_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE+PR (ALT.1)
Analysis Time Period	P.M. PEAK HOUR		

Project Description	#12018 - CHUMASH CAMP 4 PROJECT
East/West Street: SR 154	North/South Street: GRAND AVENUE
Intersection Orientation: East-West	Study Period (hrs): 1.00

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	15	586	39	11	721	25
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	15	586	39	11	721	25
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	76	44	24	5	51	3
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	76	44	24	5	51	3
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		Y			Y	
Storage		2			2	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	15	11		144			59	
C (m) (veh/h)	853	947		107			132	
v/c	0.02	0.01		1.35			0.45	
95% queue length	0.05	0.04		26.62			2.28	
Control Delay (s/veh)	9.3	8.8		772.2			54.4	
LOS	A	A		F			F	
Approach Delay (s/veh)	--	--	772.2			54.4		
Approach LOS	--	--	F			F		

AWD = 750 SF = Cost F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*03_CU+PR (ALT. 2)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*SR 154*
North/South Street:	*GRAND AVENUE*
Intersection Orientation:	*East-West*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Eastbound			Westbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*15*	*586*	*39*	*11*	*722*	*25*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*15*	*586*	*39*	*11*	*722*	*25*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Northbound			Southbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*76*	*44*	*24*	*5*	*51*	*3*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*76*	*44*	*24*	*5*	*51*	*3*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*2*			*2*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Eastbound	Westbound	Northbound			Southbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*15*	*11*		*144*			*59*	
C (m) (veh/h)	*852*	*947*		*107*			*132*	
v/c	*0.02*	*0.01*		*1.35*			*0.45*	
95% queue length	*0.05*	*0.04*		*26.62*			*2.28*	
Control Delay (s/veh)	*9.3*	*8.8*		*772.2*			*54.4*	
LOS	*A*	*A*		*F*			*F*	
Approach Delay (s/veh)	--	--	*772.2*			*54.4*		
Approach LOS	--	--	*F*			*F*		

AWD = 2.50 LOS = [illegible]

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_EX_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*11*	*210*	*5*	*49*	*280*	*88*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*11*	*210*	*5*	*49*	*280*	*88*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*67*	*33*	*23*	*7*	*40*	*48*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*67*	*33*	*23*	*7*	*40*	*48*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*11*	*49*		*95*			*123*	
C (m) (veh/h)	*1180*	*1343*		*687*			*384*	
v/c	*0.01*	*0.04*		*0.14*			*0.32*	
95% queue length	*0.03*	*0.11*		*0.48*			*1.40*	
Control Delay (s/veh)	*8.1*	*7.8*		*13.4*			*19.8*	
LOS	*A*	*A*		*B*			C	
Approach Delay (s/veh)	--	--	*13.4*			*19.8*		
Approach LOS	--	--	*B*			*C*		

AWD = 15.0 sec. / LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*11*	*232*	*7*	*50*	*306*	*88*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*11*	*232*	*7*	*50*	*306*	*88*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*11*	*50*		*102*			*123*	
C (m) (veh/h)	*1154*	*1316*		*612*			*352*	
v/c	*0.01*	*0.04*		*0.17*			*0.35*	
95% queue length	*0.03*	*0.12*		*0.60*			*1.59*	
Control Delay (s/veh)	*8.1*	*7.8*		*14.4*			*21.7*	
LOS	*A*	*A*		*B*			*C*	
Approach Delay (s/veh)	--	--	*14.4*			*21.7*		
Approach LOS	--	--	*B*			*C*		

AWD = 16.1 SEC = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014+ALT. 1_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*11*	*240*	*7*	*50*	*309*	*88*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*11*	*240*	*7*	*50*	*309*	*88*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*11*	*50*		*102*			*123*	
C (m) (veh/h)	*1151*	*1307*		*602*			*346*	
v/c	*0.01*	*0.04*		*0.17*			*0.36*	
95% queue length	*0.03*	*0.12*		*0.61*			*1.63*	
Control Delay (s/veh)	*8.2*	*7.9*		*14.6*			*22.2*	
LOS	*A*	*A*		*B*			*C*	
Approach Delay (s/veh)	--	--	*14.6*			*22.2*		
Approach LOS	--	--	*B*			*C*		

AWD = 16.5 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014+ALT. 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*ROBLAR AVENUE*
North/South Street:	*SR 154*
Intersection Orientation:	*North-South*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*11*	*240*	*7*	*50*	*310*	*88*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*11*	*240*	*7*	*50*	*310*	*88*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*67*	*33*	*23*	*12*	*40*	*50*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*11*	*50*		*102*			*123*	
C (m) (veh/h)	*1150*	*1307*		*600*			*343*	
v/c	*0.01*	*0.04*		*0.17*			*0.36*	
95% queue length	*0.03*	*0.12*		*0.61*			*1.65*	
Control Delay (s/veh)	*8.2*	*7.9*		*14.6*			*22.3*	
LOS	*A*	*A*		*B*			*C*	
Approach Delay (s/veh)	--	--	*14.6*			*22.3*		
Approach LOS	--	--	*B*			*C*		

AWD = 16.5 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*8*	*362*	*22*	*41*	*629*	*119*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*8*	*362*	*22*	*41*	*629*	*119*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*76*	*34*	*20*	*21*	*44*	*71*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*76*	*34*	*20*	*21*	*44*	*71*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*8*	*41*		*136*			*130*	
C (m) (veh/h)	*852*	*1164*		*324*			*142*	
v/c	*0.01*	*0.04*		*0.42*			*0.92*	
95% queue length	*0.03*	*0.11*		*2.12*			*11.28*	
Control Delay (s/veh)	*9.3*	*8.2*		*27.1*			*172.4*	
LOS	*A*	*A*		*D*			*F*	
Approach Delay (s/veh)	--	--	*27.1*			*172.4*		
Approach LOS	--	--	*D*			*F*		

Also = 750 sec = Cat F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU+PR (ALT. 1)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*ROBLAR AVENUE*	North/South Street:	*SR 154*
Intersection Orientation:	*North-South*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	8	370	22	41	632	119
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	8	370	22	41	632	119
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	76	34	20	21	44	71
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	76	34	20	21	44	71
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)	0			0		
Flared Approach		Y			Y	
Storage		1			1	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	8	41		136			130	
C (m) (veh/h)	849	1156		318			138	
v/c	0.01	0.04		0.43			0.94	
95% queue length	0.03	0.11		2.19			12.11	
Control Delay (s/veh)	9.3	8.2		27.8			195.6	
LOS	A	A		D			F	
Approach Delay (s/veh)	--	--	27.8			195.6		
Approach LOS	--	--	D			F		

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AWD = 7 50 [illegible]

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU+PR (ALT. 2)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		
Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*ROBLAR AVENUE*	North/South Street:	*SR 154*
Intersection Orientation:	*North-South*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*8*	*370*	*22*	*41*	*633*	*119*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*8*	*370*	*22*	*41*	*633*	*119*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*76*	*34*	*20*	*21*	*44*	*71*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*76*	*34*	*20*	*21*	*44*	*71*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*8*	*41*		*136*			*130*	
C (m) (veh/h)	*849*	*1156*		*318*			*138*	
v/c	*0.01*	*0.04*		*0.43*			*0.94*	
95% queue length	*0.03*	*0.11*		*2.19*			*12.11*	
Control Delay (s/veh)	*9.3*	*8.2*		*27.8*			*195.6*	
LOS	*A*	*A*		*D*			*F*	
Approach Delay (s/veh)	--	--	*27.8*			*195.6*		
Approach LOS	--	--	*D*			*F*		

AWSD = 7.50 SEC = (LOS F

111

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_EX_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*P.M. PEAK HOUR*		
Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*ROBLAR AVENUE*	North/South Street:	*SR 154*
Intersection Orientation:	*North-South*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*16*	*402*	*11*	*32*	*291*	*28*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*16*	*402*	*11*	*32*	*291*	*28*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*49*	*37*	*22*	*13*	*38*	*83*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*49*	*37*	*22*	*13*	*38*	*83*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*16*	*32*		*134*			*108*	
C (m) (veh/h)	*1230*	*1135*		*730*			*298*	
v/c	*0.01*	*0.03*		*0.18*			*0.36*	
95% queue length	*0.04*	*0.09*		*0.67*			*1.68*	
Control Delay (s/veh)	*8.0*	*8.3*		*15.0*			*25.0*	
LOS	*A*	*A*		*C*			*C*	
Approach Delay (s/veh)	--	--	*15.0*			*25.0*		
Approach LOS	--	--	*C*			*C*		

AWD = 17.6 sec. / LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*16*	*441*	*13*	*35*	*329*	*28*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*16*	*441*	*13*	*35*	*329*	*28*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*49*	*37*	*22*	*22*	*38*	*86*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*49*	*37*	*22*	*22*	*38*	*86*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*16*	*35*		*146*			*108*	
C (m) (veh/h)	*1191*	*1096*		*582*			*256*	
v/c	*0.01*	*0.03*		*0.25*			*0.42*	
95% queue length	*0.04*	*0.10*		*1.00*			*2.13*	
Control Delay (s/veh)	*8.1*	*8.4*		*17.3*			*30.2*	
LOS	*A*	*A*		*C*			*D*	
Approach Delay (s/veh)	--	--	*17.3*			*30.2*		
Approach LOS	--	--	*C*			*D*		

Also = 20.4 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014+ALT.1_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	16	446	13	35	338	28
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	16	446	13	35	338	28
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			0
Lanes	1	1	0	1	1	0
Configuration	L		TR	L		TR
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	49	37	22	22	38	86
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	49	37	22	22	38	86
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		Y			Y	
Storage		1			1	
RT Channelized			0			0
Lanes	0	1	0	0	1	0
Configuration		LTR			LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR			LTR	
v (veh/h)	16	35		146			108	
C (m) (veh/h)	1182	1092		569			250	
v/c	0.01	0.03		0.26			0.43	
95% queue length	0.04	0.10		1.03			2.21	
Control Delay (s/veh)	8.1	8.4		17.6			31.3	
LOS	A	A		C			D	
Approach Delay (s/veh)	--	--	17.6			31.3		
Approach LOS	--	--	C			D		

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AWD = 20.9 sec = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_2014+ALT.2_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*16*	*447*	*13*	*35*	*338*	*28*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*16*	*447*	*13*	*35*	*338*	*28*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*49*	*37*	*22*	*22*	*38*	*86*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*49*	*37*	*22*	*22*	*38*	*86*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*16*	*35*		*146*			*108*	
C (m) (veh/h)	*1182*	*1091*		*567*			*250*	
v/c	*0.01*	*0.03*		*0.26*			*0.43*	
95% queue length	*0.04*	*0.10*		*1.04*			*2.21*	
Control Delay (s/veh)	*8.1*	*8.4*		*17.7*			*31.3*	
LOS	*A*	*A*		*C*			*D*	
Approach Delay (s/veh)	--	--	*17.7*			*31.3*		
Approach LOS	--	--	*C*			*D*		

AWD = 20.9 SEC = LOS C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *ROBLAR AVENUE*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*17*	*698*	*21*	*56*	*507*	*56*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*17*	*698*	*21*	*56*	*507*	*56*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*17*	*56*		*137*			*101*	
C (m) (veh/h)	*999*	*873*		*237*			*90*	
v/c	*0.02*	*0.06*		*0.58*			*1.12*	
95% queue length	*0.05*	*0.21*		*3.82*			*15.36*	
Control Delay (s/veh)	*8.7*	*9.4*		*45.4*			*459.8*	
LOS	*A*	*A*		*E*			*F*	
Approach Delay (s/veh)	--	--	*45.4*			*459.8*		
Approach LOS	--	--	*E*			*F*		

AWD = 750 sec = LOS F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU+PR (ALT. 1)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*ROBLAR AVENUE*
North/South Street:	*SR 154*
Intersection Orientation:	*North-South*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*17*	*703*	*21*	*56*	*516*	*56*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*17*	*703*	*21*	*56*	*516*	*56*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*17*	*56*		*137*			*101*	
C (m) (veh/h)	*991*	*869*		*233*			*90*	
v/c	*0.02*	*0.06*		*0.59*			*1.12*	
95% queue length	*0.05*	*0.21*		*3.96*			*15.36*	
Control Delay (s/veh)	*8.7*	*9.4*		*47.2*			*459.8*	
LOS	*A*	*A*		*E*			*F*	
Approach Delay (s/veh)	--	--	*47.2*			*459.8*		
Approach LOS	--	--	*E*			*F*		

Add = 250 Scenario F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*04_CU+PR (ALT. 2)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*ROBLAR AVENUE*
North/South Street:	*SR 154*
Intersection Orientation:	*North-South*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*17*	*704*	*21*	*56*	*516*	*56*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*17*	*704*	*21*	*56*	*516*	*56*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*0*
Lanes	*1*	*1*	*0*	*1*	*1*	*0*
Configuration	*L*		*TR*	*L*		*TR*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*52*	*36*	*13*	*23*	*37*	*77*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*Y*			*Y*	
Storage		*1*			*1*	
RT Channelized			*0*			*0*
Lanes	*0*	*1*	*0*	*0*	*1*	*0*
Configuration		*LTR*			*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*			*LTR*	
v (veh/h)	*17*	*56*		*137*			*101*	
C (m) (veh/h)	*991*	*869*		*233*			*90*	
v/c	*0.02*	*0.06*		*0.59*			*1.12*	
95% queue length	*0.05*	*0.21*		*3.96*			*15.36*	
Control Delay (s/veh)	*8.7*	*9.4*		*47.2*			*459.8*	
LOS	*A*	*A*		*E*			*F*	
Approach Delay (s/veh)	--	--	*47.2*			*459.8*		
Approach LOS	--	--	*E*			*F*		

AWD = 750 SEC = LOS F

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_EX_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	3/21/2012	Analysis Year	EXISTING
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	107	67	29	13	71	23
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	10	127	5	15	158	150
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	203		107		10	132	15	308
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

	Eastbound		Westbound		Northbound		Southbound	
Prop. Left-Turns	0.5		0.1		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.1		0.2		0.0	0.0	0.0	0.5
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.1		-0.0		0.6	0.0	0.6	-0.3

Departure Headway and Service Time

	Eastbound		Westbound		Northbound		Southbound	
hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.18		0.10		0.01	0.12	0.01	0.27
hd, final value (s)	5.39		5.44		6.37	5.84	6.16	5.31
x, final value	0.30		0.16		0.02	0.21	0.03	0.45
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	3.4		3.4		4.1	3.5	3.9	3.0

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	453		357		260	382	265	558
Delay (s/veh)	10.74		9.49		9.19	10.13	9.02	12.41
LOS	B		A		A	B	A	B
Approach: Delay (s/veh)	10.74		9.49		10.06		12.25	
LOS	B		A		B		B	
Intersection Delay (s/veh)	11.07							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_2014_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	NEAR-TERM (YEAR 2014)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	115	67	29	14	71	24
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	10	142	5	15	175	164
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	211		109		10	147	15	339
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

	Eastbound		Westbound		Northbound		Southbound	
Prop. Left-Turns	0.5		0.1		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.1		0.2		0.0	0.0	0.0	0.5
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.1		-0.0		0.6	0.0	0.6	-0.3

Departure Headway and Service Time

	Eastbound		Westbound		Northbound		Southbound	
hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.19		0.10		0.01	0.13	0.01	0.30
hd, final value (s)	5.55		5.62		6.49	5.96	6.25	5.40
x, final value	0.33		0.17		0.02	0.24	0.03	0.51
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	3.6		3.6		4.2	3.7	3.9	3.1

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	461		359		260	397	265	589
Delay (s/veh)	11.23		9.77		9.31	10.57	9.11	13.65
LOS	B		A		A	B	A	B
Approach: Delay (s/veh)	11.23		9.77		10.49		13.45	
LOS	B		A		B		B	
Intersection Delay (s/veh)	11.85							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_2014+ALT. 1_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	2014+PROJECT (ALT. 1)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	115	67	29	14	71	29
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	10	145	5	17	176	164
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	211		114		10	150	17	340
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.5		0.1		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.1		0.3		0.0	0.0	0.0	0.5
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.1		-0.1		0.6	0.0	0.6	-0.3

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.19		0.10		0.01	0.13	0.02	0.30
hd, final value (s)	5.58		5.62		6.52	5.99	6.27	5.42
x, final value	0.33		0.18		0.02	0.25	0.03	0.51
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	3.6		3.6		4.2	3.7	4.0	3.1

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	461		364		260	400	267	590
Delay (s/veh)	11.29		9.84		9.34	10.67	9.16	13.78
LOS	B		A		A	B	A	B
Approach: Delay (s/veh)	11.29		9.84		10.59		13.56	
LOS	B		A		B		B	
Intersection Delay (s/veh)	11.93							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_2014+ALT. 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*115*	*67*	*29*	*14*	*71*	*34*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*10*	*148*	*5*	*21*	*177*	*164*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	*LTR*		*LTR*		*L*	*TR*	*L*	*TR*
PHF	*1.00*		*1.00*		*1.00*	*1.00*	*1.00*	*1.00*
Flow Rate (veh/h)	*211*		*119*		*10*	*153*	*21*	*341*
% Heavy Vehicles	*4*		*4*		*4*	*4*	*4*	*4*
No. Lanes	*1*		*1*		*2*		*2*	
Geometry Group	*2*		*2*		*5*		*5*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	*0.5*		*0.1*		*1.0*	*0.0*	*1.0*	*0.0*
Prop. Right-Turns	*0.1*		*0.3*		*0.0*	*0.0*	*0.0*	*0.5*
Prop. Heavy Vehicle	*0.0*		*0.0*		*0.0*	*0.0*	*0.0*	*0.0*
hLT-adj	*0.2*	*0.2*	*0.2*	*0.2*	*0.5*	*0.5*	*0.5*	*0.5*
hRT-adj	*-0.6*	*-0.6*	*-0.6*	*-0.6*	*-0.7*	*-0.7*	*-0.7*	*-0.7*
hHV-adj	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*
hadj, computed	*0.1*		*-0.1*		*0.6*	*0.0*	*0.6*	*-0.3*

Departure Headway and Service Time

hd, initial value (s)	*3.20*		*3.20*		*3.20*	*3.20*	*3.20*	*3.20*
x, initial	*0.19*		*0.11*		*0.01*	*0.14*	*0.02*	*0.30*
hd, final value (s)	*5.62*		*5.63*		*6.55*	*6.02*	*6.30*	*5.45*
x, final value	*0.33*		*0.19*		*0.02*	*0.26*	*0.04*	*0.52*
Move-up time, m (s)	*2.0*		*2.0*		*2.3*		*2.3*	
Service Time, t_s (s)	*3.6*		*3.6*		*4.2*	*3.7*	*4.0*	*3.2*

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	*461*		*369*		*260*	*403*	*271*	*591*
Delay (s/veh)	*11.37*		*9.92*		*9.37*	*10.78*	*9.24*	*13.93*
LOS	*B*		*A*		*A*	*B*	*A*	*B*
Approach: Delay (s/veh)	*11.37*		*9.92*		*10.70*		*13.66*	
LOS	*B*		*A*		*B*		*B*	
Intersection Delay (s/veh)	*12.01*							
Intersection LOS	*B*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	75	76	32	32	65	23
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	8	264	30	20	430	142
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	183		120		8	294	20	572
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.4		0.3		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.2		0.2		0.0	0.1	0.0	0.2
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.0		0.0		0.6	-0.0	0.6	-0.1

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.16		0.11		0.01	0.26	0.02	0.51
hd, final value (s)	6.84		7.02		7.11	6.53	6.69	6.01
x, final value	0.35		0.23		0.02	0.53	0.04	0.95
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	4.8		5.0		4.8	4.2	4.4	3.7

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	433		370		258	532	270	597
Delay (s/veh)	13.47		12.16		9.93	16.62	9.65	77.36
LOS	B		B		A	C	A	F
Approach: Delay (s/veh)	13.47		12.16		16.44		75.07	
LOS	B		B		C		F	
Intersection Delay (s/veh)	44.55							
Intersection LOS	E							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_CU+PR (ALT. 1)_AM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE+PR (ALT.1)
Analysis Time Period	A.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	75	76	32	32	65	28
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	8	267	30	22	431	142
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	183		125		8	297	22	573
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.4		0.3		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.2		0.2		0.0	0.1	0.0	0.2
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.0		-0.0		0.6	-0.0	0.6	-0.1

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.16		0.11		0.01	0.26	0.02	0.51
hd, final value (s)	6.88		7.03		7.15	6.57	6.73	6.04
x, final value	0.35		0.24		0.02	0.54	0.04	0.96
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	4.9		5.0		4.9	4.3	4.4	3.7

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	433		375		258	529	272	594
Delay (s/veh)	13.58		12.30		9.97	16.98	9.72	82.44
LOS	B		B		A	C	A	F
Approach: Delay (s/veh)	13.58		12.30		16.79		79.75	
LOS	B		B		C		F	
Intersection Delay (s/veh)	46.85							
Intersection LOS	E							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_CU+PR (ALT. 2)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*75*	*76*	*32*	*32*	*65*	*28*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*8*	*267*	*30*	*23*	*431*	*142*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	*LTR*		*LTR*		*L*	*TR*	*L*	*TR*
PHF	*1.00*		*1.00*		*1.00*	*1.00*	*1.00*	*1.00*
Flow Rate (veh/h)	*183*		*125*		*8*	*297*	*23*	*573*
% Heavy Vehicles	*4*		*4*		*4*	*4*	*4*	*4*
No. Lanes	*1*		*1*		*2*		*2*	
Geometry Group	*2*		*2*		*5*		*5*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	*0.4*		*0.3*		*1.0*	*0.0*	*1.0*	*0.0*
Prop. Right-Turns	*0.2*		*0.2*		*0.0*	*0.1*	*0.0*	*0.2*
Prop. Heavy Vehicle	*0.0*		*0.0*		*0.0*	*0.0*	*0.0*	*0.0*
hLT-adj	*0.2*	*0.2*	*0.2*	*0.2*	*0.5*	*0.5*	*0.5*	*0.5*
hRT-adj	*-0.6*	*-0.6*	*-0.6*	*-0.6*	*-0.7*	*-0.7*	*-0.7*	*-0.7*
hHV-adj	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*
hadj, computed	*0.0*		*-0.0*		*0.6*	*-0.0*	*0.6*	*-0.1*

Departure Headway and Service Time

hd, initial value (s)	*3.20*		*3.20*		*3.20*	*3.20*	*3.20*	*3.20*
x, initial	*0.16*		*0.11*		*0.01*	*0.26*	*0.02*	*0.51*
hd, final value (s)	*6.88*		*7.03*		*7.15*	*6.57*	*6.73*	*6.04*
x, final value	*0.35*		*0.24*		*0.02*	*0.54*	*0.04*	*0.96*
Move-up time, m (s)	*2.0*		*2.0*		*2.3*		*2.3*	
Service Time, t_s (s)	*4.9*		*5.0*		*4.9*	*4.3*	*4.4*	*3.7*

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	*433*		*375*		*258*	*529*	*273*	*594*
Delay (s/veh)	*13.58*		*12.30*		*9.97*	*16.98*	*9.73*	*82.46*
LOS	*B*		*B*		*A*	*C*	*A*	*F*
Approach: Delay (s/veh)	*13.58*		*12.30*		*16.80*		*79.65*	
LOS	*B*		*B*		*C*		*F*	
Intersection Delay (s/veh)	*46.83*							
Intersection LOS	*E*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_EX_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	3/21/2012	Analysis Year	EXISTING
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	124	84	7	5	76	27
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	25	261	19	11	211	98
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	215		108		25	280	11	309
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

	Eastbound		Westbound		Northbound		Southbound	
Prop. Left-Turns	0.6		0.0		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.0		0.3		0.0	0.1	0.0	0.3
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.2		-0.1		0.6	0.0	0.6	-0.2

Departure Headway and Service Time

	Eastbound		Westbound		Northbound		Southbound	
hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.19		0.10		0.02	0.25	0.01	0.27
hd, final value (s)	6.02		6.05		6.58	6.02	6.57	5.84
x, final value	0.36		0.18		0.05	0.47	0.02	0.50
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	4.0		4.0		4.3	3.7	4.3	3.5

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	465		358		275	530	261	559
Delay (s/veh)	12.39		10.39		9.59	14.00	9.40	14.36
LOS	B		B		A	B	A	B
Approach: Delay (s/veh)	12.39		10.39		13.64		14.19	
LOS	B		B		B		B	
Intersection Delay (s/veh)	13.17							
Intersection LOS	B							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_2014_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*143*	*84*	*7*	*6*	*76*	*28*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*27*	*289*	*20*	*12*	*243*	*113*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	*LTR*		*LTR*		*L*	*TR*	*L*	*TR*
PHF	*1.00*		*1.00*		*1.00*	*1.00*	*1.00*	*1.00*
Flow Rate (veh/h)	*234*		*110*		*27*	*309*	*12*	356
% Heavy Vehicles	*4*		*4*		*4*	*4*	*4*	*4*
No. Lanes	*1*		*1*		*2*		*2*	
Geometry Group	*2*		*2*		*5*		*5*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	*0.6*		*0.1*		*1.0*	*0.0*	*1.0*	*0.0*
Prop. Right-Turns	*0.0*		*0.3*		*0.0*	*0.1*	*0.0*	*0.3*
Prop. Heavy Vehicle	*0.0*		*0.0*		*0.0*	*0.0*	*0.0*	*0.0*
hLT-adj	*0.2*	*0.2*	*0.2*	*0.2*	*0.5*	*0.5*	*0.5*	*0.5*
hRT-adj	*-0.6*	*-0.6*	*-0.6*	*-0.6*	*-0.7*	*-0.7*	*-0.7*	*-0.7*
hHV-adj	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*
hadj, computed	*0.2*		*-0.1*		*0.6*	*0.0*	*0.6*	*-0.2*

Departure Headway and Service Time

hd, initial value (s)	*3.20*		*3.20*		*3.20*	*3.20*	*3.20*	*3.20*
x, initial	*0.21*		*0.10*		*0.02*	*0.27*	*0.01*	*0.32*
hd, final value (s)	*6.34*		*6.44*		*6.83*	*6.27*	*6.79*	*6.06*
x, final value	*0.41*		*0.20*		*0.05*	*0.54*	*0.02*	*0.60*
Move-up time, m (s)	*2.0*		*2.0*		*2.3*		*2.3*	
Service Time, t_s (s)	*4.3*		*4.4*		*4.5*	*4.0*	*4.5*	*3.8*

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	*484*		*360*		*277*	*550*	*262*	*572*
Delay (s/veh)	*13.75*		*11.02*		*9.90*	*16.23*	*9.65*	*17.70*
LOS	*B*		*B*		*A*	*C*	*A*	*C*
Approach: Delay (s/veh)	*13.75*		*11.02*		*15.72*		*17.44*	
LOS	*B*		*B*		*C*		*C*	
Intersection Delay (s/veh)	*15.39*							
Intersection LOS	*C*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_2014+ALT. 1_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	2014+PROJECT (ALT. 1)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	143	84	7	6	76	31
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	27	291	20	18	246	113
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	234		113		27	311	18	359
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.6		0.1		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.0		0.3		0.0	0.1	0.0	0.3
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.2		-0.1		0.6	0.0	0.6	-0.2

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.21		0.10		0.02	0.28	0.02	0.32
hd, final value (s)	6.38		6.47		6.87	6.31	6.82	6.09
x, final value	0.41		0.20		0.05	0.55	0.03	0.61
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	4.4		4.5		4.6	4.0	4.5	3.8

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	484		363		277	546	268	570
Delay (s/veh)	13.87		11.12		9.94	16.51	9.76	18.06
LOS	B		B		A	C	A	C
Approach: Delay (s/veh)	13.87		11.12		15.98		17.66	
LOS	B		B		C		C	
Intersection Delay (s/veh)	15.60							
Intersection LOS	C							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_2014+ALT. 2_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	2014+PROJECT (ALT. 2)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	143	84	9	6	76	32
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	27	291	20	18	246	113
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	236		114		27	311	18	359
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.6		0.1		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.0		0.3		0.0	0.1	0.0	0.3
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.2		-0.1		0.6	0.0	0.6	-0.2

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.21		0.10		0.02	0.28	0.02	0.32
hd, final value (s)	6.38		6.48		6.88	6.33	6.83	6.10
x, final value	0.42		0.21		0.05	0.55	0.03	0.61
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	4.4		4.5		4.6	4.0	4.5	3.8

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	486		364		277	545	268	569
Delay (s/veh)	13.94		11.15		9.95	16.58	9.78	18.15
LOS	B		B		A	C	A	C
Approach: Delay (s/veh)	13.94		11.15		16.05		17.75	
LOS	B		B		C		C	
Intersection Delay (s/veh)	15.66							
Intersection LOS	C							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	MMF	Intersection	05_CU_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE (YEAR 2030)
Analysis Time Period	P.M. PEAK HOUR		

Project ID #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: EDISON STREET | North/South Street: SR 154

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	137	61	9	21	63	46
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	17	497	31	22	363	133
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	LTR		LTR		L	TR	L	TR
PHF	1.00		1.00		1.00	1.00	1.00	1.00
Flow Rate (veh/h)	207		130		17	528	22	496
% Heavy Vehicles	4		4		4	4	4	4
No. Lanes	1		1		2		2	
Geometry Group	2		2		5		5	
Duration, T	1.00							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	0.7		0.2		1.0	0.0	1.0	0.0
Prop. Right-Turns	0.0		0.4		0.0	0.1	0.0	0.3
Prop. Heavy Vehicle	0.0		0.0		0.0	0.0	0.0	0.0
hLT-adj	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5
hRT-adj	-0.6	-0.6	-0.6	-0.6	-0.7	-0.7	-0.7	-0.7
hHV-adj	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
hadj, computed	0.2		-0.1		0.6	0.0	0.6	-0.1

Departure Headway and Service Time

hd, initial value (s)	3.20		3.20		3.20	3.20	3.20	3.20
x, initial	0.18		0.12		0.02	0.47	0.02	0.44
hd, final value (s)	7.83		7.96		7.51	6.95	7.56	6.85
x, final value	0.45		0.29		0.04	1.02	0.05	0.94
Move-up time, m (s)	2.0		2.0		2.3		2.3	
Service Time, t_s (s)	5.8		6.0		5.2	4.7	5.3	4.6

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	447		380		267	528	272	524
Delay (s/veh)	17.19		14.16		10.48	141.33	10.63	78.39
LOS	C		B		B	F	B	F
Approach: Delay (s/veh)	17.19		14.16		137.25		75.51	
LOS	C		B		F		F	
Intersection Delay (s/veh)	85.22							
Intersection LOS	F							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_CU+PR (ALT. 1)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*137*	*61*	*9*	*21*	*63*	*49*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*17*	*499*	*31*	*28*	*366*	*133*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	*LTR*		*LTR*		*L*	*TR*	*L*	*TR*
PHF	*1.00*		*1.00*		*1.00*	*1.00*	*1.00*	*1.00*
Flow Rate (veh/h)	*207*		*133*		*17*	*530*	*28*	*499*
% Heavy Vehicles	*4*		*4*		*4*	*4*	*4*	*4*
No. Lanes	*1*		*1*		*2*		*2*	
Geometry Group	*2*		*2*		*5*		*5*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

Prop. Left-Turns	*0.7*		*0.2*		*1.0*	*0.0*	*1.0*	*0.0*
Prop. Right-Turns	*0.0*		*0.4*		*0.0*	*0.1*	*0.0*	*0.3*
Prop. Heavy Vehicle	*0.0*		*0.0*		*0.0*	*0.0*	*0.0*	*0.0*
hLT-adj	*0.2*	*0.2*	*0.2*	*0.2*	*0.5*	*0.5*	*0.5*	*0.5*
hRT-adj	*-0.6*	*-0.6*	*-0.6*	*-0.6*	*-0.7*	*-0.7*	*-0.7*	*-0.7*
hHV-adj	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*
hadj, computed	*0.2*		*-0.1*		*0.6*	*0.0*	*0.6*	*-0.1*

Departure Headway and Service Time

hd, initial value (s)	*3.20*		*3.20*		*3.20*	*3.20*	*3.20*	*3.20*
x, initial	*0.18*		*0.12*		*0.02*	*0.47*	*0.02*	*0.44*
hd, final value (s)	*7.86*		*7.97*		*7.55*	*6.99*	*7.58*	*6.88*
x, final value	*0.45*		*0.29*		*0.04*	*1.03*	*0.06*	*0.95*
Move-up time, m (s)	*2.0*		*2.0*		*2.3*		*2.3*	
Service Time, t_s (s)	*5.9*		*6.0*		*5.2*	*4.7*	*5.3*	*4.6*

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	*446*		*383*		*267*	*530*	*278*	*522*
Delay (s/veh)	*17.30*		*14.29*		*10.52*	*152.62*	*10.76*	*84.02*
LOS	*C*		*B*		*B*	*F*	*B*	*F*
Approach: Delay (s/veh)	*17.30*		*14.29*		*148.21*		*80.13*	
LOS	*C*		*B*		*F*		*F*	
Intersection Delay (s/veh)	*91.07*							
Intersection LOS	*F*							

ALL-WAY STOP CONTROL ANALYSIS

General Information		Site Information	
Analyst	*MMF*	Intersection	*05_CU+PR (ALT. 2)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project ID *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *EDISON STREET* | North/South Street: *SR 154*

Volume Adjustments and Site Characteristics

Approach	Eastbound			Westbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*137*	*61*	*9*	*21*	*63*	*50*
%Thrus Left Lane						

Approach	Northbound			Southbound		
Movement	L	T	R	L	T	R
Volume (veh/h)	*17*	*499*	*31*	*28*	*366*	*133*
%Thrus Left Lane						

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Configuration	*LTR*		*LTR*		*L*	*TR*	*L*	*TR*
PHF	*1.00*		*1.00*		*1.00*	*1.00*	*1.00*	*1.00*
Flow Rate (veh/h)	*207*		*134*		*17*	*530*	*28*	*499*
% Heavy Vehicles	*4*		*4*		*4*	*4*	*4*	*4*
No. Lanes	*1*		*1*		*2*		*2*	
Geometry Group	*2*		*2*		*5*		*5*	
Duration, T	*1.00*							

Saturation Headway Adjustment Worksheet

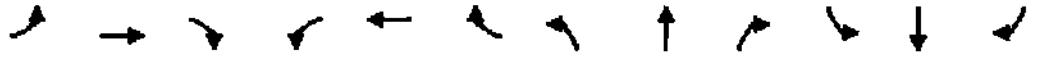
Prop. Left-Turns	*0.7*		*0.2*		*1.0*	*0.0*	*1.0*	*0.0*
Prop. Right-Turns	*0.0*		*0.4*		*0.0*	*0.1*	*0.0*	*0.3*
Prop. Heavy Vehicle	*0.0*		*0.0*		*0.0*	*0.0*	*0.0*	*0.0*
hLT-adj	*0.2*	*0.2*	*0.2*	*0.2*	*0.5*	*0.5*	*0.5*	*0.5*
hRT-adj	*-0.6*	*-0.6*	*-0.6*	*-0.6*	*-0.7*	*-0.7*	*-0.7*	*-0.7*
hHV-adj	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*	*1.7*
hadj, computed	*0.2*		*-0.1*		*0.6*	*0.0*	*0.6*	*-0.1*

Departure Headway and Service Time

hd, initial value (s)	*3.20*		*3.20*		*3.20*	*3.20*	*3.20*	*3.20*
x, initial	*0.18*		*0.12*		*0.02*	*0.47*	*0.02*	*0.44*
hd, final value (s)	*7.87*		*7.97*		*7.55*	*7.00*	*7.59*	*6.88*
x, final value	*0.45*		*0.30*		*0.04*	*1.03*	*0.06*	*0.95*
Move-up time, m (s)	*2.0*		*2.0*		*2.3*		*2.3*	
Service Time, t_s (s)	*5.9*		*6.0*		*5.3*	*4.7*	*5.3*	*4.6*

Capacity and Level of Service

	Eastbound		Westbound		Northbound		Southbound	
	L1	L2	L1	L2	L1	L2	L1	L2
Capacity (veh/h)	*445*		*384*		*267*	*530*	*278*	*522*
Delay (s/veh)	*17.33*		*14.32*		*10.53*	*153.96*	*10.77*	*84.65*
LOS	*C*		*B*		*B*	*F*	*B*	*F*
Approach: Delay (s/veh)	*17.33*		*14.32*		*149.50*		*80.72*	
LOS	*C*		*B*		*F*		*F*	
Intersection Delay (s/veh)	*91.75*							
Intersection LOS	*F*							



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.91	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1816		1736	1827	1553	1736	1661	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1816		1338	1827	1553	1362	1661	
Volume (vph)	12	592	30	120	453	19	28	18	170	78	15	23
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	12	592	30	120	453	19	28	18	170	78	15	23
RTOR Reduction (vph)	0	0	18	0	3	0	0	0	157	0	16	0
Lane Group Flow (vph)	12	592	12	120	469	0	28	18	13	78	22	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.7	23.2	23.2	4.4	26.9		17.6	17.6	4.4	17.6	17.6	
Effective Green, g (s)	0.7	23.2	23.2	4.4	26.9		17.6	17.6	4.4	17.6	17.6	
Actuated g/C Ratio	0.01	0.41	0.41	0.08	0.47		0.31	0.31	0.08	0.31	0.31	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	21	741	630	134	854		412	562	119	419	511	
v/s Ratio Prot	0.01	c0.32		c0.07	c0.26			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.02			c0.06		
v/c Ratio	0.57	0.80	0.02	0.90	0.55		0.07	0.03	0.11	0.19	0.04	
Uniform Delay, d1	28.1	14.9	10.2	26.2	10.8		14.0	13.8	24.6	14.5	13.9	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	32.5	6.0	0.0	47.3	0.7		0.3	0.1	0.4	1.0	0.2	
Delay (s)	60.6	21.0	10.2	73.5	11.6		14.3	14.0	25.0	15.5	14.1	
Level of Service	E	C	B	E	B		B	B	C	B	B	
Approach Delay (s)		21.2			24.1			22.7			15.0	
Approach LOS		C			C			C			B	

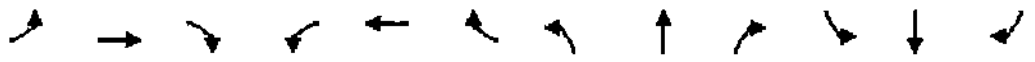
Intersection Summary			
HCM Average Control Delay	22.1	HCM Level of Service	C
HCM Volume to Capacity ratio	0.59		
Actuated Cycle Length (s)	57.2	Sum of lost time (s)	16.0
Intersection Capacity Utilization	58.8%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.91	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1816		1736	1827	1553	1736	1661	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1816		1338	1827	1553	1362	1661	
Volume (vph)	12	624	30	122	474	19	28	18	174	78	15	23
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	12	624	30	122	474	19	28	18	174	78	15	23
RTOR Reduction (vph)	0	0	17	0	2	0	0	0	157	0	17	0
Lane Group Flow (vph)	12	624	13	122	491	0	28	18	17	78	21	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.8	25.6	25.6	6.0	30.8		17.1	17.1	6.0	17.1	17.1	
Effective Green, g (s)	0.8	25.6	25.6	6.0	30.8		17.1	17.1	6.0	17.1	17.1	
Actuated g/C Ratio	0.01	0.42	0.42	0.10	0.51		0.28	0.28	0.10	0.28	0.28	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	23	771	655	172	921		377	515	154	384	468	
v/s Ratio Prot	0.01	c0.34		c0.07	0.27			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.02			c0.06		
v/c Ratio	0.52	0.81	0.02	0.71	0.53		0.07	0.03	0.11	0.20	0.05	
Uniform Delay, d1	29.8	15.4	10.2	26.5	10.1		16.0	15.8	24.9	16.6	15.9	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	19.7	6.3	0.0	12.6	0.6		0.4	0.1	0.3	1.2	0.2	
Delay (s)	49.5	21.7	10.2	39.1	10.7		16.4	15.9	25.2	17.8	16.0	
Level of Service	D	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		21.7			16.3			23.4			17.2	
Approach LOS		C			B			C			B	

Intersection Summary			
HCM Average Control Delay	19.5	HCM Level of Service	B
HCM Volume to Capacity ratio	0.58		
Actuated Cycle Length (s)	60.7	Sum of lost time (s)	12.0
Intersection Capacity Utilization	60.6%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.91	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1817		1736	1827	1553	1736	1661	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1817		1338	1827	1553	1362	1661	
Volume (vph)	12	628	30	128	486	19	28	18	176	78	15	23
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	12	628	30	128	486	19	28	18	176	78	15	23
RTOR Reduction (vph)	0	0	18	0	2	0	0	0	160	0	16	0
Lane Group Flow (vph)	12	628	12	128	503	0	28	18	16	78	22	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.7	23.7	23.7	5.2	28.2		16.6	16.6	5.2	16.6	16.6	
Effective Green, g (s)	0.7	23.7	23.7	5.2	28.2		16.6	16.6	5.2	16.6	16.6	
Actuated g/C Ratio	0.01	0.41	0.41	0.09	0.49		0.29	0.29	0.09	0.29	0.29	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	21	753	640	157	891		386	527	140	393	480	
v/s Ratio Prot	0.01	c0.34		c0.07	0.28			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.02			c0.06		
v/c Ratio	0.57	0.83	0.02	0.82	0.56		0.07	0.03	0.11	0.20	0.05	
Uniform Delay, d1	28.3	15.1	10.0	25.7	10.3		14.9	14.7	24.0	15.4	14.7	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	32.5	7.9	0.0	26.7	0.8		0.4	0.1	0.4	1.1	0.2	
Delay (s)	60.7	23.0	10.0	52.3	11.1		15.2	14.8	24.4	16.6	14.9	
Level of Service	E	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		23.1			19.5			22.5			16.0	
Approach LOS		C			B			C			B	

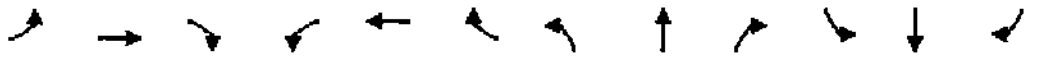
Intersection Summary			
HCM Average Control Delay	21.1	HCM Level of Service	C
HCM Volume to Capacity ratio	0.60		
Actuated Cycle Length (s)	57.5	Sum of lost time (s)	12.0
Intersection Capacity Utilization	61.1%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.91	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1817		1736	1827	1553	1736	1661	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1817		1338	1827	1553	1362	1661	
Volume (vph)	12	629	30	129	487	19	28	18	177	78	15	23
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	12	629	30	129	487	19	28	18	177	78	15	23
RTOR Reduction (vph)	0	0	18	0	2	0	0	0	161	0	16	0
Lane Group Flow (vph)	12	629	12	129	504	0	28	18	16	78	22	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.7	23.7	23.7	5.2	28.2		16.6	16.6	5.2	16.6	16.6	
Effective Green, g (s)	0.7	23.7	23.7	5.2	28.2		16.6	16.6	5.2	16.6	16.6	
Actuated g/C Ratio	0.01	0.41	0.41	0.09	0.49		0.29	0.29	0.09	0.29	0.29	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	21	753	640	157	891		386	527	140	393	480	
v/s Ratio Prot	0.01	c0.34		c0.07	0.28			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.02			c0.06		
v/c Ratio	0.57	0.84	0.02	0.82	0.57		0.07	0.03	0.11	0.20	0.05	
Uniform Delay, d1	28.3	15.2	10.0	25.7	10.3		14.9	14.7	24.0	15.4	14.7	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	32.5	8.0	0.0	27.9	0.8		0.4	0.1	0.4	1.1	0.2	
Delay (s)	60.7	23.1	10.0	53.6	11.2		15.2	14.8	24.4	16.6	14.9	
Level of Service	E	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		23.2			19.8			22.5			16.0	
Approach LOS		C			B			C			B	

Intersection Summary			
HCM Average Control Delay	21.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.60		
Actuated Cycle Length (s)	57.5	Sum of lost time (s)	12.0
Intersection Capacity Utilization	61.2%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.90	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1805		1736	1827	1553	1736	1637	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1805		1325	1827	1553	1362	1637	
Volume (vph)	20	817	38	158	631	55	39	18	218	122	15	34
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	20	817	38	158	631	55	39	18	218	122	15	34
RTOR Reduction (vph)	0	0	20	0	5	0	0	0	197	0	25	0
Lane Group Flow (vph)	20	817	18	158	681	0	39	18	21	122	24	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Effective Green, g (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Actuated g/C Ratio	0.01	0.46	0.46	0.09	0.54		0.25	0.25	0.09	0.25	0.25	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	22	844	718	165	982		335	463	147	345	414	
v/s Ratio Prot	0.01	c0.45		c0.09	0.38			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.03			c0.09		
v/c Ratio	0.91	0.97	0.02	0.96	0.69		0.12	0.04	0.14	0.35	0.06	
Uniform Delay, d1	31.2	16.5	9.3	28.5	10.5		18.2	17.8	26.2	19.4	17.9	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	148.5	23.2	0.0	56.9	2.1		0.7	0.2	0.4	2.8	0.3	
Delay (s)	179.6	39.7	9.3	85.4	12.7		18.9	18.0	26.7	22.2	18.1	
Level of Service	F	D	A	F	B		B	B	C	C	B	
Approach Delay (s)		41.6			26.3			25.0			21.0	
Approach LOS		D			C			C			C	

Intersection Summary			
HCM Average Control Delay	31.9	HCM Level of Service	C
HCM Volume to Capacity ratio	0.77		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.2%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.90	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1805		1736	1827	1553	1736	1637	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1805		1325	1827	1553	1362	1637	
Volume (vph)	20	821	38	164	643	55	39	18	220	122	15	34
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	20	821	38	164	643	55	39	18	220	122	15	34
RTOR Reduction (vph)	0	0	20	0	5	0	0	0	199	0	25	0
Lane Group Flow (vph)	20	821	18	164	693	0	39	18	21	122	24	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Effective Green, g (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Actuated g/C Ratio	0.01	0.46	0.46	0.09	0.54		0.25	0.25	0.09	0.25	0.25	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	22	844	718	165	982		335	463	147	345	414	
v/s Ratio Prot	0.01	c0.45		c0.09	0.38			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.03			c0.09		
v/c Ratio	0.91	0.97	0.02	0.99	0.71		0.12	0.04	0.14	0.35	0.06	
Uniform Delay, d1	31.2	16.6	9.3	28.6	10.7		18.2	17.8	26.2	19.4	17.9	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	148.5	24.3	0.0	67.9	2.3		0.7	0.2	0.4	2.8	0.3	
Delay (s)	179.6	40.9	9.3	96.5	13.0		18.9	18.0	26.7	22.2	18.1	
Level of Service	F	D	A	F	B		B	B	C	C	B	
Approach Delay (s)		42.7			28.9			25.0			21.0	
Approach LOS		D			C			C			C	

Intersection Summary			
HCM Average Control Delay	33.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.78		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.7%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.90	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1805		1736	1827	1553	1736	1637	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.73	1.00	1.00	0.75	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1805		1325	1827	1553	1362	1637	
Volume (vph)	20	822	38	165	644	55	39	18	221	122	15	34
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	20	822	38	165	644	55	39	18	221	122	15	34
RTOR Reduction (vph)	0	0	20	0	5	0	0	0	200	0	25	0
Lane Group Flow (vph)	20	822	18	165	694	0	39	18	21	122	24	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Effective Green, g (s)	0.8	29.2	29.2	6.0	34.4		16.0	16.0	6.0	16.0	16.0	
Actuated g/C Ratio	0.01	0.46	0.46	0.09	0.54		0.25	0.25	0.09	0.25	0.25	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	22	844	718	165	982		335	463	147	345	414	
v/s Ratio Prot	0.01	c0.45		c0.10	0.38			0.01	0.01		0.01	
v/s Ratio Perm			0.01				0.03			c0.09		
v/c Ratio	0.91	0.97	0.02	1.00	0.71		0.12	0.04	0.14	0.35	0.06	
Uniform Delay, d1	31.2	16.6	9.3	28.6	10.7		18.2	17.8	26.2	19.4	17.9	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	148.5	24.5	0.0	70.1	2.3		0.7	0.2	0.4	2.8	0.3	
Delay (s)	179.6	41.2	9.3	98.7	13.0		18.9	18.0	26.7	22.2	18.1	
Level of Service	F	D	A	F	B		B	B	C	C	B	
Approach Delay (s)		42.9			29.4			25.0			21.0	
Approach LOS		D			C			C			C	

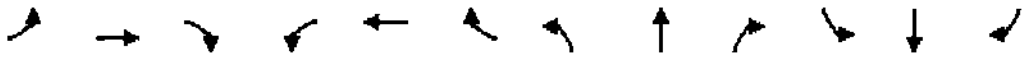
Intersection Summary			
HCM Average Control Delay	33.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.78		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.8%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.94	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1814		1736	1827	1553	1736	1726	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1814		1306	1827	1553	1332	1726	
Volume (vph)	36	553	38	177	667	33	69	43	239	99	41	24
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	36	553	38	177	667	33	69	43	239	99	41	24
RTOR Reduction (vph)	0	0	23	0	3	0	0	0	205	0	17	0
Lane Group Flow (vph)	36	553	15	177	697	0	69	43	34	99	48	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	1.5	22.7	22.7	8.5	29.7		16.1	16.1	8.5	16.1	16.1	
Effective Green, g (s)	1.5	22.7	22.7	8.5	29.7		16.1	16.1	8.5	16.1	16.1	
Actuated g/C Ratio	0.03	0.38	0.38	0.14	0.50		0.27	0.27	0.14	0.27	0.27	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	44	699	594	249	909		355	496	223	362	469	
v/s Ratio Prot	0.02	0.30		c0.10	c0.38			0.02	0.02		0.03	
v/s Ratio Perm			0.01				0.05			c0.07		
v/c Ratio	0.82	0.79	0.02	0.71	0.77		0.19	0.09	0.15	0.27	0.10	
Uniform Delay, d1	28.8	16.2	11.4	24.2	12.0		16.6	16.1	22.2	17.0	16.2	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	69.3	6.1	0.0	9.2	3.9		1.2	0.3	0.3	1.9	0.4	
Delay (s)	98.1	22.3	11.4	33.4	15.9		17.8	16.5	22.6	18.9	16.6	
Level of Service	F	C	B	C	B		B	B	C	B	B	
Approach Delay (s)		26.0			19.4			20.9			18.0	
Approach LOS		C			B			C			B	

Intersection Summary			
HCM Average Control Delay	21.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.58		
Actuated Cycle Length (s)	59.3	Sum of lost time (s)	8.0
Intersection Capacity Utilization	62.6%	ICU Level of Service	B
Analysis Period (min)	15		

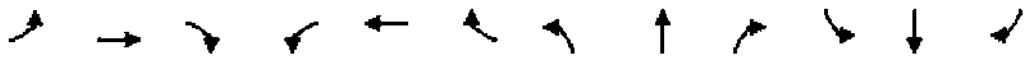
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.94	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1814		1736	1827	1553	1736	1726	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1814		1306	1827	1553	1332	1726	
Volume (vph)	36	590	38	177	708	34	69	43	242	99	41	24
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	36	590	38	177	708	34	69	43	242	99	41	24
RTOR Reduction (vph)	0	0	23	0	2	0	0	0	210	0	18	0
Lane Group Flow (vph)	36	590	15	177	740	0	69	43	32	99	47	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	1.5	23.7	23.7	7.9	30.1		16.1	16.1	7.9	16.1	16.1	
Effective Green, g (s)	1.5	23.7	23.7	7.9	30.1		16.1	16.1	7.9	16.1	16.1	
Actuated g/C Ratio	0.03	0.40	0.40	0.13	0.50		0.27	0.27	0.13	0.27	0.27	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	44	725	617	230	915		352	493	206	359	465	
v/s Ratio Prot	0.02	0.32		c0.10	c0.41			0.02	0.02		0.03	
v/s Ratio Perm			0.01				0.05			c0.07		
v/c Ratio	0.82	0.81	0.02	0.77	0.81		0.20	0.09	0.16	0.28	0.10	
Uniform Delay, d1	29.0	16.0	11.0	25.0	12.4		16.8	16.3	22.9	17.2	16.4	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	69.3	7.0	0.0	14.3	5.3		1.2	0.3	0.4	1.9	0.4	
Delay (s)	98.3	23.0	11.0	39.3	17.7		18.1	16.7	23.3	19.1	16.8	
Level of Service	F	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		26.4			21.9			21.5			18.2	
Approach LOS		C			C			C			B	

Intersection Summary			
HCM Average Control Delay	22.9	HCM Level of Service	C
HCM Volume to Capacity ratio	0.61		
Actuated Cycle Length (s)	59.7	Sum of lost time (s)	8.0
Intersection Capacity Utilization	64.8%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.94	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1814		1736	1827	1553	1736	1726	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1814		1306	1827	1553	1332	1726	
Volume (vph)	36	604	38	181	716	34	69	43	248	99	41	24
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	36	604	38	181	716	34	69	43	248	99	41	24
RTOR Reduction (vph)	0	0	23	0	2	0	0	0	215	0	18	0
Lane Group Flow (vph)	36	604	15	181	748	0	69	43	33	99	47	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	1.5	24.1	24.1	7.9	30.5		16.1	16.1	7.9	16.1	16.1	
Effective Green, g (s)	1.5	24.1	24.1	7.9	30.5		16.1	16.1	7.9	16.1	16.1	
Actuated g/C Ratio	0.02	0.40	0.40	0.13	0.51		0.27	0.27	0.13	0.27	0.27	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	43	733	623	228	921		350	489	204	357	462	
v/s Ratio Prot	0.02	0.33		c0.10	c0.41			0.02	0.02		0.03	
v/s Ratio Perm			0.01				0.05			c0.07		
v/c Ratio	0.84	0.82	0.02	0.79	0.81		0.20	0.09	0.16	0.28	0.10	
Uniform Delay, d1	29.2	16.1	10.9	25.3	12.4		17.0	16.5	23.2	17.4	16.6	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	76.6	7.5	0.0	17.1	5.5		1.3	0.4	0.4	1.9	0.4	
Delay (s)	105.8	23.6	10.9	42.4	17.9		18.3	16.8	23.5	19.3	17.0	
Level of Service	F	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		27.2			22.7			21.7			18.4	
Approach LOS		C			C			C			B	

Intersection Summary			
HCM Average Control Delay	23.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.62		
Actuated Cycle Length (s)	60.1	Sum of lost time (s)	8.0
Intersection Capacity Utilization	65.2%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.94	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1815		1736	1827	1553	1736	1726	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1815		1306	1827	1553	1332	1726	
Volume (vph)	36	605	38	182	717	34	69	43	248	99	41	24
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	36	605	38	182	717	34	69	43	248	99	41	24
RTOR Reduction (vph)	0	0	23	0	2	0	0	0	215	0	18	0
Lane Group Flow (vph)	36	605	15	182	749	0	69	43	33	99	47	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	1.5	24.2	24.2	7.9	30.6		16.1	16.1	7.9	16.1	16.1	
Effective Green, g (s)	1.5	24.2	24.2	7.9	30.6		16.1	16.1	7.9	16.1	16.1	
Actuated g/C Ratio	0.02	0.40	0.40	0.13	0.51		0.27	0.27	0.13	0.27	0.27	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	43	734	624	228	923		349	489	204	356	462	
v/s Ratio Prot	0.02	0.33		c0.10	c0.41			0.02	0.02		0.03	
v/s Ratio Perm			0.01				0.05			c0.07		
v/c Ratio	0.84	0.82	0.02	0.80	0.81		0.20	0.09	0.16	0.28	0.10	
Uniform Delay, d1	29.2	16.1	10.9	25.4	12.4		17.1	16.5	23.2	17.5	16.6	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	76.6	7.5	0.0	17.4	5.5		1.3	0.4	0.4	1.9	0.4	
Delay (s)	105.8	23.6	10.9	42.8	17.9		18.3	16.9	23.6	19.4	17.1	
Level of Service	F	C	B	D	B		B	B	C	B	B	
Approach Delay (s)		27.2			22.7			21.8			18.5	
Approach LOS		C			C			C			B	

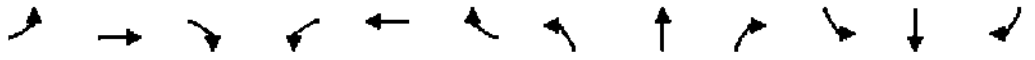
Intersection Summary			
HCM Average Control Delay	23.7	HCM Level of Service	C
HCM Volume to Capacity ratio	0.62		
Actuated Cycle Length (s)	60.2	Sum of lost time (s)	8.0
Intersection Capacity Utilization	65.3%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.93	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1803		1736	1827	1553	1736	1701	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1803		1293	1827	1553	1332	1701	
Volume (vph)	44	774	46	226	883	83	80	43	286	143	41	35
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	44	774	46	226	883	83	80	43	286	143	41	35
RTOR Reduction (vph)	0	0	27	0	5	0	0	0	234	0	26	0
Lane Group Flow (vph)	44	774	19	226	961	0	80	43	52	143	50	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Effective Green, g (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Actuated g/C Ratio	0.04	0.42	0.42	0.13	0.51		0.26	0.26	0.13	0.26	0.26	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	68	759	645	225	913		336	475	202	346	442	
v/s Ratio Prot	0.03	0.42		c0.13	c0.53			0.02	0.03		0.03	
v/s Ratio Perm			0.01				0.06			c0.11		
v/c Ratio	0.65	1.02	0.03	1.00	1.05		0.24	0.09	0.26	0.41	0.11	
Uniform Delay, d1	29.2	18.0	10.7	26.8	15.2		18.0	17.3	24.1	18.9	17.4	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	19.2	37.7	0.0	61.1	44.4		1.7	0.4	0.7	3.6	0.5	
Delay (s)	48.4	55.7	10.7	87.9	59.6		19.7	17.7	24.8	22.5	17.9	
Level of Service	D	E	B	F	E		B	B	C	C	B	
Approach Delay (s)		53.0			65.0			23.0			20.9	
Approach LOS		D			E			C			C	

Intersection Summary			
HCM Average Control Delay	51.1	HCM Level of Service	D
HCM Volume to Capacity ratio	0.82		
Actuated Cycle Length (s)	61.6	Sum of lost time (s)	8.0
Intersection Capacity Utilization	79.4%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.93	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1804		1736	1827	1553	1736	1701	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1804		1293	1827	1553	1332	1701	
Volume (vph)	44	788	46	230	891	83	80	43	292	143	41	35
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	44	788	46	230	891	83	80	43	292	143	41	35
RTOR Reduction (vph)	0	0	27	0	5	0	0	0	232	0	26	0
Lane Group Flow (vph)	44	788	19	230	969	0	80	43	60	143	50	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Effective Green, g (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Actuated g/C Ratio	0.04	0.42	0.42	0.13	0.51		0.26	0.26	0.13	0.26	0.26	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	68	759	645	225	914		336	475	202	346	442	
v/s Ratio Prot	0.03	0.43		c0.13	c0.54			0.02	0.04		0.03	
v/s Ratio Perm			0.01				0.06			c0.11		
v/c Ratio	0.65	1.04	0.03	1.02	1.06		0.24	0.09	0.30	0.41	0.11	
Uniform Delay, d1	29.2	18.0	10.7	26.8	15.2		18.0	17.3	24.2	18.9	17.4	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	19.2	43.0	0.0	65.9	47.1		1.7	0.4	0.8	3.6	0.5	
Delay (s)	48.4	61.0	10.7	92.7	62.3		19.7	17.7	25.1	22.5	17.9	
Level of Service	D	E	B	F	E		B	B	C	C	B	
Approach Delay (s)		57.7			68.1			23.3			20.9	
Approach LOS		E			E			C			C	

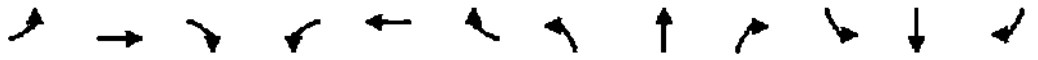
Intersection Summary			
HCM Average Control Delay	54.1	HCM Level of Service	D
HCM Volume to Capacity ratio	0.83		
Actuated Cycle Length (s)	61.6	Sum of lost time (s)	8.0
Intersection Capacity Utilization	79.8%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	0.85	1.00	0.99		1.00	1.00	0.85	1.00	0.93	
Flt Protected	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1736	1827	1553	1736	1804		1736	1827	1553	1736	1701	
Flt Permitted	0.95	1.00	1.00	0.95	1.00		0.71	1.00	1.00	0.73	1.00	
Satd. Flow (perm)	1736	1827	1553	1736	1804		1293	1827	1553	1332	1701	
Volume (vph)	44	789	46	231	892	83	80	43	292	143	41	35
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	44	789	46	231	892	83	80	43	292	143	41	35
RTOR Reduction (vph)	0	0	27	0	5	0	0	0	232	0	26	0
Lane Group Flow (vph)	44	789	19	231	970	0	80	43	60	143	50	0
Turn Type	Prot		Perm	Prot			Perm		Over	Perm		
Protected Phases	7	4		3	8			2	3		6	
Permitted Phases			4				2			6		
Actuated Green, G (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Effective Green, g (s)	2.4	25.6	25.6	8.0	31.2		16.0	16.0	8.0	16.0	16.0	
Actuated g/C Ratio	0.04	0.42	0.42	0.13	0.51		0.26	0.26	0.13	0.26	0.26	
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0	4.0	4.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	68	759	645	225	914		336	475	202	346	442	
v/s Ratio Prot	0.03	0.43		c0.13	c0.54			0.02	0.04		0.03	
v/s Ratio Perm			0.01				0.06			c0.11		
v/c Ratio	0.65	1.04	0.03	1.03	1.06		0.24	0.09	0.30	0.41	0.11	
Uniform Delay, d1	29.2	18.0	10.7	26.8	15.2		18.0	17.3	24.2	18.9	17.4	
Progression Factor	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2	19.2	43.4	0.0	67.1	47.4		1.7	0.4	0.8	3.6	0.5	
Delay (s)	48.4	61.4	10.7	93.9	62.6		19.7	17.7	25.1	22.5	17.9	
Level of Service	D	E	B	F	E		B	B	C	C	B	
Approach Delay (s)		58.1			68.6			23.3			20.9	
Approach LOS		E			E			C			C	

Intersection Summary			
HCM Average Control Delay	54.4	HCM Level of Service	D
HCM Volume to Capacity ratio	0.83		
Actuated Cycle Length (s)	61.6	Sum of lost time (s)	8.0
Intersection Capacity Utilization	79.9%	ICU Level of Service	D
Analysis Period (min)	15		

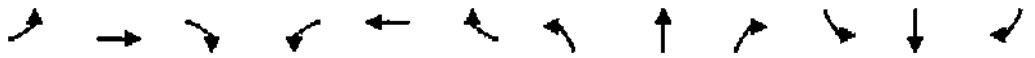
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1709		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1376	1709		1367	1827	1553
Volume (vph)	230	591	15	8	459	156	6	8	6	131	7	194
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	230	591	15	8	459	156	6	8	6	131	7	194
RTOR Reduction (vph)	0	0	7	0	0	102	0	4	0	0	0	161
Lane Group Flow (vph)	230	591	8	8	459	54	6	10	0	131	7	33
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.3	30.3	30.3	0.8	20.8	20.8	17.1	17.1		17.1	17.1	10.3
Effective Green, g (s)	10.3	30.3	30.3	0.8	20.8	20.8	17.1	17.1		17.1	17.1	10.3
Actuated g/C Ratio	0.17	0.50	0.50	0.01	0.35	0.35	0.28	0.28		0.28	0.28	0.17
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	297	920	782	23	631	537	391	485		388	519	266
v/s Ratio Prot	c0.13	0.32		0.00	c0.25			0.01			0.00	0.02
v/s Ratio Perm			0.00			0.03	0.00			c0.10		
v/c Ratio	0.77	0.64	0.01	0.35	0.73	0.10	0.02	0.02		0.34	0.01	0.12
Uniform Delay, d1	23.8	11.0	7.5	29.4	17.2	13.4	15.5	15.5		17.1	15.5	21.1
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	11.9	1.5	0.0	8.9	4.2	0.1	0.1	0.1		2.3	0.0	0.2
Delay (s)	35.7	12.5	7.5	38.4	21.4	13.4	15.6	15.6		19.4	15.5	21.3
Level of Service	D	B	A	D	C	B	B	B		B	B	C
Approach Delay (s)		18.8			19.6			15.6			20.5	
Approach LOS		B			B			B			C	

Intersection Summary			
HCM Average Control Delay	19.4	HCM Level of Service	B
HCM Volume to Capacity ratio	0.60		
Actuated Cycle Length (s)	60.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	60.8%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1709		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1376	1709		1367	1827	1553
Volume (vph)	235	622	15	8	477	157	6	8	6	134	7	199
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	235	622	15	8	477	157	6	8	6	134	7	199
RTOR Reduction (vph)	0	0	7	0	0	102	0	4	0	0	0	165
Lane Group Flow (vph)	235	622	8	8	477	55	6	10	0	134	7	34
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.3	30.7	30.7	0.8	21.2	21.2	17.1	17.1		17.1	17.1	10.3
Effective Green, g (s)	10.3	30.7	30.7	0.8	21.2	21.2	17.1	17.1		17.1	17.1	10.3
Actuated g/C Ratio	0.17	0.51	0.51	0.01	0.35	0.35	0.28	0.28		0.28	0.28	0.17
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	295	926	787	23	639	543	388	482		386	516	264
v/s Ratio Prot	c0.14	c0.34		0.00	0.26			0.01			0.00	0.02
v/s Ratio Perm			0.00			0.04	0.00			c0.10		
v/c Ratio	0.80	0.67	0.01	0.35	0.75	0.10	0.02	0.02		0.35	0.01	0.13
Uniform Delay, d1	24.1	11.2	7.4	29.6	17.3	13.3	15.7	15.7		17.3	15.7	21.3
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	13.8	1.9	0.0	8.9	4.7	0.1	0.1	0.1		2.5	0.0	0.2
Delay (s)	38.0	13.1	7.4	38.6	22.1	13.4	15.8	15.8		19.8	15.7	21.6
Level of Service	D	B	A	D	C	B	B	B		B	B	C
Approach Delay (s)		19.7			20.2			15.8			20.7	
Approach LOS		B			C			B			C	

Intersection Summary			
HCM Average Control Delay	20.0	HCM Level of Service	C
HCM Volume to Capacity ratio	0.57		
Actuated Cycle Length (s)	60.6	Sum of lost time (s)	8.0
Intersection Capacity Utilization	62.2%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1709		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1376	1709		1367	1827	1553
Volume (vph)	235	628	15	8	496	163	6	8	6	136	7	199
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	235	628	15	8	496	163	6	8	6	136	7	199
RTOR Reduction (vph)	0	0	7	0	0	105	0	4	0	0	0	165
Lane Group Flow (vph)	235	628	8	8	496	58	6	10	0	136	7	34
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.3	31.0	31.0	0.8	21.5	21.5	17.1	17.1		17.1	17.1	10.3
Effective Green, g (s)	10.3	31.0	31.0	0.8	21.5	21.5	17.1	17.1		17.1	17.1	10.3
Actuated g/C Ratio	0.17	0.51	0.51	0.01	0.35	0.35	0.28	0.28		0.28	0.28	0.17
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	294	930	791	23	645	548	386	480		384	513	263
v/s Ratio Prot	c0.14	0.34		0.00	c0.27			0.01			0.00	0.02
v/s Ratio Perm			0.00			0.04	0.00			c0.10		
v/c Ratio	0.80	0.68	0.01	0.35	0.77	0.11	0.02	0.02		0.35	0.01	0.13
Uniform Delay, d1	24.3	11.2	7.4	29.8	17.5	13.2	15.8	15.8		17.5	15.8	21.5
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	14.1	2.0	0.0	8.9	5.5	0.1	0.1	0.1		2.5	0.0	0.2
Delay (s)	38.4	13.1	7.4	38.7	23.0	13.3	15.9	15.9		20.0	15.9	21.7
Level of Service	D	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		19.8			20.8			15.9			20.9	
Approach LOS		B			C			B			C	

Intersection Summary			
HCM Average Control Delay	20.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.63		
Actuated Cycle Length (s)	60.9	Sum of lost time (s)	12.0
Intersection Capacity Utilization	63.3%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1709		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1376	1709		1367	1827	1553
Volume (vph)	235	630	15	8	497	164	6	8	6	137	7	199
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	235	630	15	8	497	164	6	8	6	137	7	199
RTOR Reduction (vph)	0	0	7	0	0	106	0	4	0	0	0	165
Lane Group Flow (vph)	235	630	8	8	497	58	6	10	0	137	7	34
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.3	31.1	31.1	0.8	21.6	21.6	17.1	17.1		17.1	17.1	10.3
Effective Green, g (s)	10.3	31.1	31.1	0.8	21.6	21.6	17.1	17.1		17.1	17.1	10.3
Actuated g/C Ratio	0.17	0.51	0.51	0.01	0.35	0.35	0.28	0.28		0.28	0.28	0.17
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	293	931	792	23	647	550	386	479		383	512	262
v/s Ratio Prot	c0.14	0.34		0.00	c0.27			0.01			0.00	0.02
v/s Ratio Perm			0.00			0.04	0.00			c0.10		
v/c Ratio	0.80	0.68	0.01	0.35	0.77	0.11	0.02	0.02		0.36	0.01	0.13
Uniform Delay, d1	24.4	11.2	7.4	29.8	17.5	13.2	15.9	15.9		17.6	15.9	21.5
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	14.5	2.0	0.0	8.9	5.5	0.1	0.1	0.1		2.6	0.0	0.2
Delay (s)	38.9	13.2	7.4	38.8	22.9	13.3	15.9	16.0		20.2	15.9	21.8
Level of Service	D	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		19.9			20.8			16.0			21.0	
Approach LOS		B			C			B			C	

Intersection Summary			
HCM Average Control Delay	20.4	HCM Level of Service	C
HCM Volume to Capacity ratio	0.63		
Actuated Cycle Length (s)	61.0	Sum of lost time (s)	12.0
Intersection Capacity Utilization	63.4%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.92		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1679		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1378	1679		1368	1827	1553
Volume (vph)	219	1037	10	14	801	197	9	6	7	183	5	217
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	219	1037	10	14	801	197	9	6	7	183	5	217
RTOR Reduction (vph)	0	0	5	0	0	109	0	5	0	0	0	193
Lane Group Flow (vph)	219	1037	5	14	801	88	9	8	0	183	5	24
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Effective Green, g (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Actuated g/C Ratio	0.11	0.54	0.54	0.01	0.45	0.45	0.25	0.25		0.25	0.25	0.11
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	192	994	845	22	815	693	349	425		346	463	172
v/s Ratio Prot	c0.13	c0.57		0.01	0.44			0.00			0.00	0.02
v/s Ratio Perm			0.00			0.06	0.01			c0.13		
v/c Ratio	1.14	1.04	0.01	0.64	0.98	0.13	0.03	0.02		0.53	0.01	0.14
Uniform Delay, d1	28.1	14.4	6.6	31.1	17.3	10.3	17.7	17.7		20.4	17.7	25.4
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	107.9	40.5	0.0	47.5	27.1	0.1	0.1	0.1		5.7	0.0	0.4
Delay (s)	136.0	54.9	6.6	78.6	44.4	10.4	17.9	17.8		26.0	17.7	25.8
Level of Service	F	D	A	E	D	B	B	B		C	B	C
Approach Delay (s)		68.5			38.2			17.8			25.8	
Approach LOS		E			D			B			C	

Intersection Summary			
HCM Average Control Delay	50.4	HCM Level of Service	D
HCM Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	8.0
Intersection Capacity Utilization	84.7%	ICU Level of Service	E
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.92		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1679		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1378	1679		1368	1827	1553
Volume (vph)	219	1043	10	14	819	203	9	6	7	185	5	217
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	219	1043	10	14	819	203	9	6	7	185	5	217
RTOR Reduction (vph)	0	0	5	0	0	112	0	5	0	0	0	193
Lane Group Flow (vph)	219	1043	5	14	819	91	9	8	0	185	5	24
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Effective Green, g (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Actuated g/C Ratio	0.11	0.54	0.54	0.01	0.45	0.45	0.25	0.25		0.25	0.25	0.11
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	192	994	845	22	815	693	349	425		346	463	172
v/s Ratio Prot	c0.13	c0.57		0.01	0.45			0.00			0.00	0.02
v/s Ratio Perm			0.00			0.06	0.01			c0.14		
v/c Ratio	1.14	1.05	0.01	0.64	1.00	0.13	0.03	0.02		0.53	0.01	0.14
Uniform Delay, d1	28.1	14.4	6.6	31.1	17.5	10.3	17.7	17.7		20.4	17.7	25.4
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	107.9	42.4	0.0	47.5	32.7	0.1	0.1	0.1		5.8	0.0	0.4
Delay (s)	136.0	56.8	6.6	78.6	50.2	10.4	17.9	17.8		26.2	17.7	25.8
Level of Service	F	E	A	E	D	B	B	B		C	B	C
Approach Delay (s)		70.0			42.8			17.8			25.9	
Approach LOS		E			D			B			C	

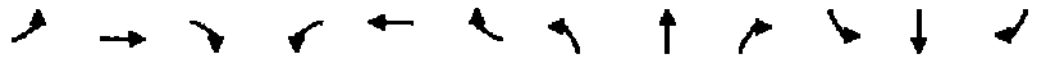
Intersection Summary			
HCM Average Control Delay	52.7	HCM Level of Service	D
HCM Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	8.0
Intersection Capacity Utilization	85.1%	ICU Level of Service	E
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.92		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1679		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.75	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1378	1679		1368	1827	1553
Volume (vph)	219	1045	10	14	821	204	9	6	7	186	5	217
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	219	1045	10	14	821	204	9	6	7	186	5	217
RTOR Reduction (vph)	0	0	5	0	0	113	0	5	0	0	0	193
Lane Group Flow (vph)	219	1045	5	14	821	91	9	8	0	186	5	24
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Effective Green, g (s)	7.0	34.4	34.4	0.8	28.2	28.2	16.0	16.0		16.0	16.0	7.0
Actuated g/C Ratio	0.11	0.54	0.54	0.01	0.45	0.45	0.25	0.25		0.25	0.25	0.11
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	192	994	845	22	815	693	349	425		346	463	172
v/s Ratio Prot	c0.13	c0.57		0.01	0.45			0.00			0.00	0.02
v/s Ratio Perm			0.00			0.06	0.01			c0.14		
v/c Ratio	1.14	1.05	0.01	0.64	1.01	0.13	0.03	0.02		0.54	0.01	0.14
Uniform Delay, d1	28.1	14.4	6.6	31.1	17.5	10.3	17.7	17.7		20.4	17.7	25.4
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	107.9	43.0	0.0	47.5	33.3	0.1	0.1	0.1		5.9	0.0	0.4
Delay (s)	136.0	57.4	6.6	78.6	50.8	10.4	17.9	17.8		26.3	17.7	25.8
Level of Service	F	E	A	E	D	B	B	B		C	B	C
Approach Delay (s)		70.5			43.3			17.8			25.9	
Approach LOS		E			D			B			C	

Intersection Summary			
HCM Average Control Delay	53.1	HCM Level of Service	D
HCM Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	8.0
Intersection Capacity Utilization	85.3%	ICU Level of Service	E
Analysis Period (min)	15		

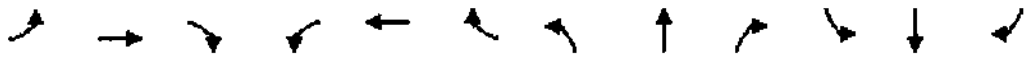
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1716		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.72	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1362	1716		1315	1827	1553
Volume (vph)	264	563	25	8	574	181	37	34	23	188	18	356
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	264	563	25	8	574	181	37	34	23	188	18	356
RTOR Reduction (vph)	0	0	12	0	0	113	0	17	0	0	0	295
Lane Group Flow (vph)	264	563	13	8	574	68	37	40	0	188	18	61
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.7	33.4	33.4	0.8	23.5	23.5	16.0	16.0		16.0	16.0	10.7
Effective Green, g (s)	10.7	33.4	33.4	0.8	23.5	23.5	16.0	16.0		16.0	16.0	10.7
Actuated g/C Ratio	0.17	0.54	0.54	0.01	0.38	0.38	0.26	0.26		0.26	0.26	0.17
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	299	981	834	22	690	587	350	441		338	470	267
v/s Ratio Prot	c0.15	0.31		0.00	c0.31			0.02			0.01	0.04
v/s Ratio Perm			0.01			0.04	0.03			c0.14		
v/c Ratio	0.88	0.57	0.02	0.38	0.83	0.12	0.11	0.09		0.56	0.04	0.23
Uniform Delay, d1	25.1	9.6	6.7	30.4	17.6	12.6	17.6	17.6		20.0	17.3	22.2
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	24.9	0.8	0.0	9.9	8.5	0.1	0.6	0.4		6.5	0.2	0.4
Delay (s)	50.0	10.5	6.7	40.4	26.0	12.7	18.2	18.0		26.5	17.5	22.6
Level of Service	D	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		22.6			23.0			18.1			23.8	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	22.8	HCM Level of Service	C
HCM Volume to Capacity ratio	0.75		
Actuated Cycle Length (s)	62.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	71.9%	ICU Level of Service	C
Analysis Period (min)	15		

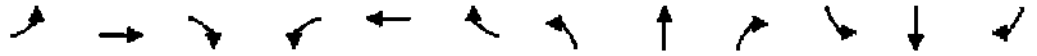
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1716		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.72	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1362	1716		1315	1827	1553
Volume (vph)	271	596	25	8	607	186	37	34	23	190	18	365
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	271	596	25	8	607	186	37	34	23	190	18	365
RTOR Reduction (vph)	0	0	12	0	0	115	0	17	0	0	0	307
Lane Group Flow (vph)	271	596	13	8	607	71	37	40	0	190	18	58
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Effective Green, g (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Actuated g/C Ratio	0.16	0.53	0.53	0.01	0.38	0.38	0.27	0.27		0.27	0.27	0.16
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	275	966	821	22	700	595	366	462		354	491	246
v/s Ratio Prot	c0.16	0.33		0.00	c0.33			0.02			0.01	0.04
v/s Ratio Perm			0.01			0.05	0.03			c0.14		
v/c Ratio	0.99	0.62	0.02	0.36	0.87	0.12	0.10	0.09		0.54	0.04	0.23
Uniform Delay, d1	26.5	10.4	7.1	30.9	18.0	12.6	17.4	17.3		19.7	17.1	23.3
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	49.8	1.2	0.0	9.9	11.0	0.1	0.6	0.4		5.7	0.1	0.5
Delay (s)	76.4	11.6	7.1	40.9	29.0	12.7	17.9	17.7		25.5	17.2	23.7
Level of Service	E	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		31.2			25.3			17.8			24.1	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	26.9	HCM Level of Service	C
HCM Volume to Capacity ratio	0.78		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	74.2%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1716		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.72	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1362	1716		1315	1827	1553
Volume (vph)	271	616	25	8	619	190	37	34	23	196	18	365
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	271	616	25	8	619	190	37	34	23	196	18	365
RTOR Reduction (vph)	0	0	12	0	0	117	0	17	0	0	0	307
Lane Group Flow (vph)	271	616	13	8	619	73	37	40	0	196	18	58
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Effective Green, g (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Actuated g/C Ratio	0.16	0.53	0.53	0.01	0.38	0.38	0.27	0.27		0.27	0.27	0.16
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	275	966	821	22	700	595	366	462		354	491	246
v/s Ratio Prot	c0.16	0.34		0.00	c0.34			0.02			0.01	0.04
v/s Ratio Perm			0.01			0.05	0.03			c0.15		
v/c Ratio	0.99	0.64	0.02	0.36	0.88	0.12	0.10	0.09		0.55	0.04	0.23
Uniform Delay, d1	26.5	10.6	7.1	30.9	18.2	12.6	17.4	17.3		19.8	17.1	23.3
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	49.8	1.4	0.0	9.9	12.8	0.1	0.6	0.4		6.1	0.1	0.5
Delay (s)	76.4	12.0	7.1	40.9	30.9	12.7	17.9	17.7		26.0	17.2	23.7
Level of Service	E	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		31.0			26.8			17.8			24.3	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	27.4	HCM Level of Service	C
HCM Volume to Capacity ratio	0.79		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.1%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.94		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1716		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.75	1.00		0.72	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1362	1716		1315	1827	1553
Volume (vph)	271	617	25	8	621	191	37	34	23	197	18	365
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	271	617	25	8	621	191	37	34	23	197	18	365
RTOR Reduction (vph)	0	0	12	0	0	118	0	17	0	0	0	307
Lane Group Flow (vph)	271	617	13	8	621	73	37	40	0	197	18	58
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Effective Green, g (s)	10.0	33.4	33.4	0.8	24.2	24.2	17.0	17.0		17.0	17.0	10.0
Actuated g/C Ratio	0.16	0.53	0.53	0.01	0.38	0.38	0.27	0.27		0.27	0.27	0.16
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	275	966	821	22	700	595	366	462		354	491	246
v/s Ratio Prot	c0.16	0.34		0.00	c0.34			0.02			0.01	0.04
v/s Ratio Perm			0.01			0.05	0.03			c0.15		
v/c Ratio	0.99	0.64	0.02	0.36	0.89	0.12	0.10	0.09		0.56	0.04	0.23
Uniform Delay, d1	26.5	10.6	7.1	30.9	18.2	12.6	17.4	17.3		19.9	17.1	23.3
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	49.8	1.4	0.0	9.9	13.0	0.1	0.6	0.4		6.2	0.1	0.5
Delay (s)	76.4	12.0	7.1	40.9	31.2	12.7	17.9	17.7		26.0	17.2	23.7
Level of Service	E	B	A	D	C	B	B	B		C	B	C
Approach Delay (s)		31.0			27.0			17.8			24.3	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	27.5	HCM Level of Service	C
HCM Volume to Capacity ratio	0.80		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.3%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.97		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1781		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.74	1.00		0.73	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1360	1781		1326	1827	1553
Volume (vph)	263	902	21	16	974	160	48	40	8	247	20	323
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	263	902	21	16	974	160	48	40	8	247	20	323
RTOR Reduction (vph)	0	0	9	0	0	87	0	6	0	0	0	285
Lane Group Flow (vph)	263	902	12	16	974	73	48	42	0	247	20	38
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Effective Green, g (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Actuated g/C Ratio	0.12	0.56	0.56	0.01	0.46	0.46	0.25	0.25		0.25	0.25	0.12
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	204	1029	874	20	836	710	339	444		331	455	182
v/s Ratio Prot	c0.15	0.49		0.01	c0.53			0.02			0.01	0.02
v/s Ratio Perm			0.01			0.05	0.04			c0.19		
v/c Ratio	1.29	0.88	0.01	0.80	1.17	0.10	0.14	0.09		0.75	0.04	0.21
Uniform Delay, d1	30.1	12.9	6.6	33.6	18.5	10.5	19.9	19.7		23.6	19.4	27.2
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	161.8	8.5	0.0	110.1	87.2	0.1	0.9	0.4		14.2	0.2	0.6
Delay (s)	191.9	21.4	6.6	143.7	105.7	10.6	20.8	20.1		37.8	19.6	27.8
Level of Service	F	C	A	F	F	B	C	C		D	B	C
Approach Delay (s)		58.9			93.0			20.5			31.7	
Approach LOS		E			F			C			C	

Intersection Summary			
HCM Average Control Delay	65.4	HCM Level of Service	E
HCM Volume to Capacity ratio	1.06		
Actuated Cycle Length (s)	68.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	96.2%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.97		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1781		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.74	1.00		0.73	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1360	1781		1326	1827	1553
Volume (vph)	263	922	21	16	986	164	48	40	8	253	20	323
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	263	922	21	16	986	164	48	40	8	253	20	323
RTOR Reduction (vph)	0	0	9	0	0	89	0	6	0	0	0	285
Lane Group Flow (vph)	263	922	12	16	986	75	48	42	0	253	20	38
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Effective Green, g (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Actuated g/C Ratio	0.12	0.56	0.56	0.01	0.46	0.46	0.25	0.25		0.25	0.25	0.12
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	204	1029	874	20	836	710	339	444		331	455	182
v/s Ratio Prot	c0.15	0.50		0.01	c0.54			0.02			0.01	0.02
v/s Ratio Perm			0.01			0.05	0.04			c0.19		
v/c Ratio	1.29	0.90	0.01	0.80	1.18	0.11	0.14	0.09		0.76	0.04	0.21
Uniform Delay, d1	30.1	13.1	6.6	33.6	18.5	10.5	19.9	19.7		23.7	19.4	27.2
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	161.8	10.2	0.0	110.1	93.0	0.1	0.9	0.4		15.4	0.2	0.6
Delay (s)	191.9	23.3	6.6	143.7	111.5	10.6	20.8	20.1		39.1	19.6	27.8
Level of Service	F	C	A	F	F	B	C	C		D	B	C
Approach Delay (s)		59.8			97.8			20.5			32.3	
Approach LOS		E			F			C			C	

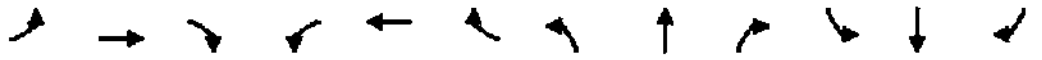
Intersection Summary			
HCM Average Control Delay	67.7	HCM Level of Service	E
HCM Volume to Capacity ratio	1.07		
Actuated Cycle Length (s)	68.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	97.1%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Frt	1.00	1.00	0.85	1.00	1.00	0.85	1.00	0.97		1.00	1.00	0.85
Flt Protected	0.95	1.00	1.00	0.95	1.00	1.00	0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1736	1827	1553	1736	1827	1553	1736	1781		1736	1827	1553
Flt Permitted	0.95	1.00	1.00	0.95	1.00	1.00	0.74	1.00		0.73	1.00	1.00
Satd. Flow (perm)	1736	1827	1553	1736	1827	1553	1360	1781		1326	1827	1553
Volume (vph)	263	923	21	16	988	165	48	40	8	254	20	323
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	263	923	21	16	988	165	48	40	8	254	20	323
RTOR Reduction (vph)	0	0	9	0	0	90	0	6	0	0	0	285
Lane Group Flow (vph)	263	923	12	16	988	75	48	42	0	254	20	38
Turn Type	Prot		Perm	Prot		Perm	Perm			Perm		Over
Protected Phases	7	4		3	8			2			6	7
Permitted Phases			4			8	2			6		
Actuated Green, G (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Effective Green, g (s)	8.0	38.4	38.4	0.8	31.2	31.2	17.0	17.0		17.0	17.0	8.0
Actuated g/C Ratio	0.12	0.56	0.56	0.01	0.46	0.46	0.25	0.25		0.25	0.25	0.12
Clearance Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0		4.0	4.0	4.0
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	3.0	3.0	3.0		3.0	3.0	3.0
Lane Grp Cap (vph)	204	1029	874	20	836	710	339	444		331	455	182
v/s Ratio Prot	c0.15	0.51		0.01	c0.54			0.02			0.01	0.02
v/s Ratio Perm			0.01			0.05	0.04			c0.19		
v/c Ratio	1.29	0.90	0.01	0.80	1.18	0.11	0.14	0.09		0.77	0.04	0.21
Uniform Delay, d1	30.1	13.2	6.6	33.6	18.5	10.5	19.9	19.7		23.8	19.4	27.2
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00		1.00	1.00	1.00
Incremental Delay, d2	161.8	10.3	0.0	110.1	94.0	0.1	0.9	0.4		15.6	0.2	0.6
Delay (s)	191.9	23.4	6.6	143.7	112.5	10.6	20.8	20.1		39.4	19.6	27.8
Level of Service	F	C	A	F	F	B	C	C		D	B	C
Approach Delay (s)		59.8			98.5			20.5			32.5	
Approach LOS		E			F			C			C	

Intersection Summary			
HCM Average Control Delay	68.0	HCM Level of Service	E
HCM Volume to Capacity ratio	1.07		
Actuated Cycle Length (s)	68.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	97.3%	ICU Level of Service	F
Analysis Period (min)	15		

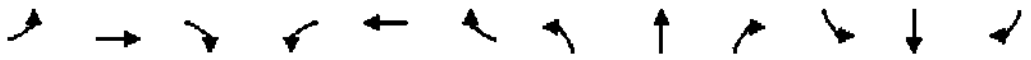
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.98		1.00	0.98		1.00	0.91		1.00	0.87	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1800		1736	1788		1736	1671		1736	1597	
Flt Permitted	0.95	1.00		0.95	1.00		0.58	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1800		1736	1788		1055	1671		1306	1597	
Volume (vph)	140	423	47	28	318	52	49	28	37	109	37	191
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	140	423	47	28	318	52	49	28	37	109	37	191
RTOR Reduction (vph)	0	7	0	0	10	0	0	24	0	0	125	0
Lane Group Flow (vph)	140	463	0	28	360	0	49	41	0	109	103	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	6.9	22.3		1.4	16.8		18.7	18.7		18.7	18.7	
Effective Green, g (s)	6.9	22.3		1.4	16.8		18.7	18.7		18.7	18.7	
Actuated g/C Ratio	0.13	0.41		0.03	0.31		0.34	0.34		0.34	0.34	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	220	738		45	552		363	574		449	549	
v/s Ratio Prot	c0.08	c0.26		0.02	0.20			0.02			0.06	
v/s Ratio Perm							0.05			c0.08		
v/c Ratio	0.64	0.63		0.62	0.65		0.13	0.07		0.24	0.19	
Uniform Delay, d1	22.6	12.7		26.2	16.3		12.3	12.0		12.8	12.5	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	5.9	1.7		23.8	2.8		0.8	0.2		1.3	0.8	
Delay (s)	28.5	14.4		50.0	19.0		13.1	12.2		14.1	13.3	
Level of Service	C	B		D	B		B	B		B	B	
Approach Delay (s)		17.6			21.2			12.6			13.5	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	17.3	HCM Level of Service	B
HCM Volume to Capacity ratio	0.45		
Actuated Cycle Length (s)	54.4	Sum of lost time (s)	8.0
Intersection Capacity Utilization	58.8%	ICU Level of Service	B
Analysis Period (min)	15		

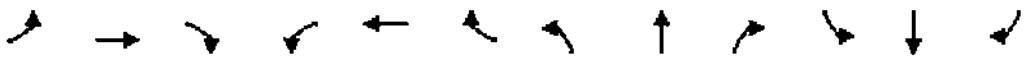
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.91		1.00	0.87	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1801		1736	1790		1736	1671		1736	1597	
Flt Permitted	0.95	1.00		0.95	1.00		0.57	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1801		1736	1790		1046	1671		1306	1597	
Volume (vph)	140	458	47	28	337	53	49	28	37	110	37	191
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	140	458	47	28	337	53	49	28	37	110	37	191
RTOR Reduction (vph)	0	6	0	0	10	0	0	25	0	0	128	0
Lane Group Flow (vph)	140	499	0	28	380	0	49	40	0	110	100	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	6.9	22.8		1.4	17.3		17.7	17.7		17.7	17.7	
Effective Green, g (s)	6.9	22.8		1.4	17.3		17.7	17.7		17.7	17.7	
Actuated g/C Ratio	0.13	0.42		0.03	0.32		0.33	0.33		0.33	0.33	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	222	762		45	575		343	549		429	524	
v/s Ratio Prot	c0.08	c0.28		0.02	0.21			0.02			0.06	
v/s Ratio Perm							0.05			c0.08		
v/c Ratio	0.63	0.65		0.62	0.66		0.14	0.07		0.26	0.19	
Uniform Delay, d1	22.3	12.4		26.0	15.8		12.8	12.5		13.3	13.0	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	5.7	2.0		23.8	2.8		0.9	0.3		1.4	0.8	
Delay (s)	28.0	14.4		49.8	18.6		13.6	12.7		14.7	13.8	
Level of Service	C	B		D	B		B	B		B	B	
Approach Delay (s)		17.4			20.7			13.1			14.1	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	17.2	HCM Level of Service	B
HCM Volume to Capacity ratio	0.48		
Actuated Cycle Length (s)	53.9	Sum of lost time (s)	8.0
Intersection Capacity Utilization	60.7%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.91		1.00	0.87	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1802		1736	1788		1736	1671		1736	1597	
Flt Permitted	0.95	1.00		0.95	1.00		0.57	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1802		1736	1788		1044	1671		1306	1597	
Volume (vph)	140	466	47	28	361	59	49	28	37	112	37	191
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	140	466	47	28	361	59	49	28	37	112	37	191
RTOR Reduction (vph)	0	6	0	0	10	0	0	25	0	0	129	0
Lane Group Flow (vph)	140	507	0	28	410	0	49	40	0	112	99	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	6.4	23.1		1.4	18.1		17.7	17.7		17.7	17.7	
Effective Green, g (s)	6.4	23.1		1.4	18.1		17.7	17.7		17.7	17.7	
Actuated g/C Ratio	0.12	0.43		0.03	0.33		0.33	0.33		0.33	0.33	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	205	768		45	597		341	546		426	522	
v/s Ratio Prot	c0.08	c0.28		0.02	0.23			0.02			0.06	
v/s Ratio Perm							0.05			c0.09		
v/c Ratio	0.66	0.66		0.62	0.69		0.14	0.07		0.26	0.19	
Uniform Delay, d1	22.9	12.4		26.1	15.6		12.9	12.6		13.4	13.1	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	9.0	2.1		23.8	3.3		0.9	0.3		1.5	0.8	
Delay (s)	32.0	14.5		49.9	18.9		13.8	12.9		14.9	13.9	
Level of Service	C	B		D	B		B	B		B	B	
Approach Delay (s)		18.2			20.8			13.3			14.3	
Approach LOS		B			C			B			B	

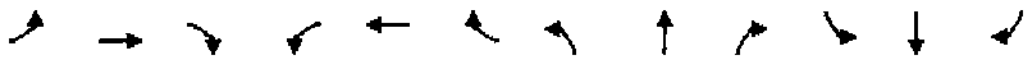
Intersection Summary			
HCM Average Control Delay	17.7	HCM Level of Service	B
HCM Volume to Capacity ratio	0.49		
Actuated Cycle Length (s)	54.2	Sum of lost time (s)	8.0
Intersection Capacity Utilization	61.1%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.91		1.00	0.87	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1802		1736	1788		1736	1671		1736	1597	
Flt Permitted	0.95	1.00		0.95	1.00		0.57	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1802		1736	1788		1043	1671		1306	1597	
Volume (vph)	140	469	47	28	364	60	49	28	37	113	37	191
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	140	469	47	28	364	60	49	28	37	113	37	191
RTOR Reduction (vph)	0	6	0	0	11	0	0	25	0	0	129	0
Lane Group Flow (vph)	140	510	0	28	413	0	49	40	0	113	99	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	6.4	23.2		1.4	18.2		17.7	17.7		17.7	17.7	
Effective Green, g (s)	6.4	23.2		1.4	18.2		17.7	17.7		17.7	17.7	
Actuated g/C Ratio	0.12	0.43		0.03	0.34		0.33	0.33		0.33	0.33	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	205	770		45	599		340	545		426	521	
v/s Ratio Prot	c0.08	c0.28		0.02	0.23			0.02			0.06	
v/s Ratio Perm							0.05			c0.09		
v/c Ratio	0.68	0.66		0.62	0.69		0.14	0.07		0.27	0.19	
Uniform Delay, d1	23.0	12.4		26.2	15.6		12.9	12.6		13.5	13.2	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	9.0	2.1		23.8	3.4		0.9	0.3		1.5	0.8	
Delay (s)	32.0	14.6		50.0	19.0		13.8	12.9		15.0	14.0	
Level of Service	C	B		D	B		B	B		B	B	
Approach Delay (s)		18.3			21.0			13.3			14.3	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	17.8	HCM Level of Service	B
HCM Volume to Capacity ratio	0.49		
Actuated Cycle Length (s)	54.3	Sum of lost time (s)	8.0
Intersection Capacity Utilization	61.3%	ICU Level of Service	B
Analysis Period (min)	15		

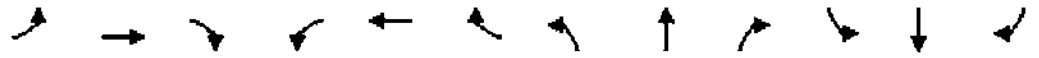
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.98		1.00	0.98		1.00	0.91		1.00	0.88	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1793		1736	1782		1736	1658		1736	1615	
Flt Permitted	0.95	1.00		0.95	1.00		0.45	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1793		1736	1782		820	1658		1296	1615	
Volume (vph)	256	715	100	40	552	109	81	28	45	168	60	204
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	256	715	100	40	552	109	81	28	45	168	60	204
RTOR Reduction (vph)	0	8	0	0	11	0	0	33	0	0	152	0
Lane Group Flow (vph)	256	807	0	40	650	0	81	40	0	168	112	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.0	32.7		1.6	25.3		16.0	16.0		16.0	16.0	
Effective Green, g (s)	9.0	32.7		1.6	25.3		16.0	16.0		16.0	16.0	
Actuated g/C Ratio	0.14	0.52		0.03	0.41		0.26	0.26		0.26	0.26	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	251	941		45	724		211	426		333	415	
v/s Ratio Prot	c0.15	c0.45		0.02	0.36			0.02			0.07	
v/s Ratio Perm							0.10			c0.13		
v/c Ratio	1.02	0.86		0.89	0.90		0.38	0.09		0.50	0.27	
Uniform Delay, d1	26.6	12.8		30.3	17.3		19.1	17.6		19.8	18.5	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	62.0	7.8		91.4	13.8		5.2	0.4		5.4	1.6	
Delay (s)	88.7	20.6		121.7	31.1		24.3	18.1		25.1	20.1	
Level of Service	F	C		F	C		C	B		C	C	
Approach Delay (s)		36.9			36.3			21.3			22.1	
Approach LOS		D			D			C			C	

Intersection Summary			
HCM Average Control Delay	33.0	HCM Level of Service	C
HCM Volume to Capacity ratio	0.76		
Actuated Cycle Length (s)	62.3	Sum of lost time (s)	8.0
Intersection Capacity Utilization	83.4%	ICU Level of Service	E
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.98		1.00	0.98		1.00	0.91		1.00	0.88	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1794		1736	1781		1736	1658		1736	1615	
Flt Permitted	0.95	1.00		0.95	1.00		0.45	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1794		1736	1781		819	1658		1296	1615	
Volume (vph)	256	723	100	40	576	115	81	28	45	170	60	204
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	256	723	100	40	576	115	81	28	45	170	60	204
RTOR Reduction (vph)	0	8	0	0	11	0	0	33	0	0	152	0
Lane Group Flow (vph)	256	815	0	40	680	0	81	40	0	170	112	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.0	32.8		1.6	25.4		16.0	16.0		16.0	16.0	
Effective Green, g (s)	9.0	32.8		1.6	25.4		16.0	16.0		16.0	16.0	
Actuated g/C Ratio	0.14	0.53		0.03	0.41		0.26	0.26		0.26	0.26	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	250	943		45	725		210	425		332	414	
v/s Ratio Prot	c0.15	c0.45		0.02	0.38			0.02			0.07	
v/s Ratio Perm							0.10			c0.13		
v/c Ratio	1.02	0.86		0.89	0.94		0.39	0.09		0.51	0.27	
Uniform Delay, d1	26.7	12.9		30.3	17.7		19.1	17.7		19.9	18.5	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	63.3	8.3		91.4	19.5		5.3	0.4		5.5	1.6	
Delay (s)	90.0	21.2		121.7	37.3		24.4	18.1		25.4	20.2	
Level of Service	F	C		F	D		C	B		C	C	
Approach Delay (s)		37.5			41.9			21.4			22.2	
Approach LOS		D			D			C			C	

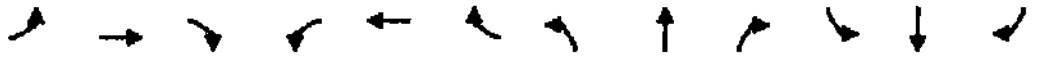
Intersection Summary			
HCM Average Control Delay	35.0	HCM Level of Service	D
HCM Volume to Capacity ratio	0.76		
Actuated Cycle Length (s)	62.4	Sum of lost time (s)	8.0
Intersection Capacity Utilization	85.0%	ICU Level of Service	E
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.98		1.00	0.97		1.00	0.91		1.00	0.88	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1793		1736	1781		1736	1658		1736	1615	
Flt Permitted	0.95	1.00		0.95	1.00		0.45	1.00		0.71	1.00	
Satd. Flow (perm)	1736	1793		1736	1781		819	1658		1296	1615	
Volume (vph)	256	715	100	40	579	116	81	28	45	171	60	204
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	256	715	100	40	579	116	81	28	45	171	60	204
RTOR Reduction (vph)	0	8	0	0	11	0	0	33	0	0	152	0
Lane Group Flow (vph)	256	807	0	40	684	0	81	40	0	171	112	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.0	32.8		1.6	25.4		16.0	16.0		16.0	16.0	
Effective Green, g (s)	9.0	32.8		1.6	25.4		16.0	16.0		16.0	16.0	
Actuated g/C Ratio	0.14	0.53		0.03	0.41		0.26	0.26		0.26	0.26	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	250	942		45	725		210	425		332	414	
v/s Ratio Prot	c0.15	0.45		0.02	c0.38			0.02			0.07	
v/s Ratio Perm							0.10			c0.13		
v/c Ratio	1.02	0.86		0.89	0.94		0.39	0.09		0.52	0.27	
Uniform Delay, d1	26.7	12.8		30.3	17.8		19.1	17.7		19.9	18.5	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	63.3	7.8		91.4	20.6		5.3	0.4		5.6	1.6	
Delay (s)	90.0	20.5		121.7	38.4		24.4	18.1		25.5	20.2	
Level of Service	F	C		F	D		C	B		C	C	
Approach Delay (s)		37.1			42.9			21.4			22.3	
Approach LOS		D			D			C			C	

Intersection Summary			
HCM Average Control Delay	35.2	HCM Level of Service	D
HCM Volume to Capacity ratio	0.82		
Actuated Cycle Length (s)	62.4	Sum of lost time (s)	12.0
Intersection Capacity Utilization	85.2%	ICU Level of Service	E
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1814		1736	1791		1736	1675		1736	1574	
Flt Permitted	0.95	1.00		0.95	1.00		0.62	1.00		0.73	1.00	
Satd. Flow (perm)	1736	1814		1736	1791		1128	1675		1340	1574	
Volume (vph)	173	546	28	23	584	89	32	16	20	52	13	159
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	173	546	28	23	584	89	32	16	20	52	13	159
RTOR Reduction (vph)	0	3	0	0	9	0	0	15	0	0	116	0
Lane Group Flow (vph)	173	571	0	23	664	0	32	21	0	52	56	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.0	32.8		0.8	26.6		17.0	17.0		17.0	17.0	
Effective Green, g (s)	7.0	32.8		0.8	26.6		17.0	17.0		17.0	17.0	
Actuated g/C Ratio	0.11	0.52		0.01	0.42		0.27	0.27		0.27	0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	194	950		22	761		306	455		364	427	
v/s Ratio Prot	c0.10	0.31		0.01	c0.37			0.01			0.04	
v/s Ratio Perm							0.03			c0.04		
v/c Ratio	0.89	0.60		1.05	0.87		0.10	0.05		0.14	0.13	
Uniform Delay, d1	27.4	10.4		30.9	16.5		17.1	16.8		17.3	17.2	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	36.2	1.1		206.7	10.8		0.7	0.2		0.8	0.6	
Delay (s)	63.6	11.4		237.6	27.3		17.8	17.0		18.1	17.9	
Level of Service	E	B		F	C		B	B		B	B	
Approach Delay (s)		23.5			34.2			17.4			17.9	
Approach LOS		C			C			B			B	

Intersection Summary			
HCM Average Control Delay	26.8	HCM Level of Service	C
HCM Volume to Capacity ratio	0.63		
Actuated Cycle Length (s)	62.6	Sum of lost time (s)	12.0
Intersection Capacity Utilization	72.9%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1814		1736	1793		1736	1675		1736	1574	
Flt Permitted	0.95	1.00		0.95	1.00		0.61	1.00		0.73	1.00	
Satd. Flow (perm)	1736	1814		1736	1793		1123	1675		1340	1574	
Volume (vph)	173	581	28	23	622	88	32	16	20	53	13	159
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	173	581	28	23	622	88	32	16	20	53	13	159
RTOR Reduction (vph)	0	2	0	0	8	0	0	15	0	0	116	0
Lane Group Flow (vph)	173	607	0	23	702	0	32	21	0	53	56	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.0	33.4		0.8	27.2		17.0	17.0		17.0	17.0	
Effective Green, g (s)	7.0	33.4		0.8	27.2		17.0	17.0		17.0	17.0	
Actuated g/C Ratio	0.11	0.53		0.01	0.43		0.27	0.27		0.27	0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	192	959		22	772		302	451		360	423	
v/s Ratio Prot	c0.10	0.33		0.01	c0.39			0.01			0.04	
v/s Ratio Perm							0.03			c0.04		
v/c Ratio	0.90	0.63		1.05	0.91		0.11	0.05		0.15	0.13	
Uniform Delay, d1	27.8	10.6		31.2	16.8		17.4	17.1		17.6	17.5	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	38.5	1.4		206.7	14.5		0.7	0.2		0.9	0.6	
Delay (s)	66.2	11.9		237.9	31.3		18.1	17.3		18.4	18.2	
Level of Service	E	B		F	C		B	B		B	B	
Approach Delay (s)		23.9			37.8			17.7			18.2	
Approach LOS		C			D			B			B	

Intersection Summary			
HCM Average Control Delay	28.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.66		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	74.8%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1815		1736	1792		1736	1675		1736	1574	
Flt Permitted	0.95	1.00		0.95	1.00		0.61	1.00		0.73	1.00	
Satd. Flow (perm)	1736	1815		1736	1792		1112	1675		1340	1574	
Volume (vph)	173	608	28	23	638	92	32	16	20	59	13	159
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	173	608	28	23	638	92	32	16	20	59	13	159
RTOR Reduction (vph)	0	2	0	0	8	0	0	15	0	0	119	0
Lane Group Flow (vph)	173	634	0	23	722	0	32	21	0	59	53	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.0	34.4		0.8	28.2		16.0	16.0		16.0	16.0	
Effective Green, g (s)	7.0	34.4		0.8	28.2		16.0	16.0		16.0	16.0	
Actuated g/C Ratio	0.11	0.54		0.01	0.45		0.25	0.25		0.25	0.25	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	192	988		22	800		282	424		339	398	
v/s Ratio Prot	c0.10	0.35		0.01	c0.40			0.01			0.03	
v/s Ratio Perm							0.03			c0.04		
v/c Ratio	0.90	0.64		1.05	0.90		0.11	0.05		0.17	0.13	
Uniform Delay, d1	27.8	10.1		31.2	16.2		18.1	17.8		18.4	18.2	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	38.5	1.4		206.7	13.4		0.8	0.2		1.1	0.7	
Delay (s)	66.2	11.5		237.9	29.6		19.0	18.1		19.6	18.9	
Level of Service	E	B		F	C		B	B		B	B	
Approach Delay (s)		23.2			35.9			18.5			19.1	
Approach LOS		C			D			B			B	

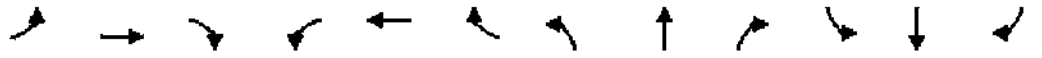
Intersection Summary			
HCM Average Control Delay	27.7	HCM Level of Service	C
HCM Volume to Capacity ratio	0.67		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	75.9%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1815		1736	1792		1736	1675		1736	1574	
Flt Permitted	0.95	1.00		0.95	1.00		0.61	1.00		0.73	1.00	
Satd. Flow (perm)	1736	1815		1736	1792		1112	1675		1340	1574	
Volume (vph)	173	618	28	23	646	93	32	16	20	58	13	159
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	173	618	28	23	646	93	32	16	20	58	13	159
RTOR Reduction (vph)	0	2	0	0	8	0	0	15	0	0	119	0
Lane Group Flow (vph)	173	644	0	23	731	0	32	21	0	58	53	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.0	34.4		0.8	28.2		16.0	16.0		16.0	16.0	
Effective Green, g (s)	7.0	34.4		0.8	28.2		16.0	16.0		16.0	16.0	
Actuated g/C Ratio	0.11	0.54		0.01	0.45		0.25	0.25		0.25	0.25	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	192	988		22	800		282	424		339	398	
v/s Ratio Prot	c0.10	0.35		0.01	c0.41			0.01			0.03	
v/s Ratio Perm							0.03			c0.04		
v/c Ratio	0.90	0.65		1.05	0.91		0.11	0.05		0.17	0.13	
Uniform Delay, d1	27.8	10.2		31.2	16.4		18.1	17.8		18.4	18.2	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	38.5	1.6		206.7	14.7		0.8	0.2		1.1	0.7	
Delay (s)	66.2	11.7		237.9	31.1		19.0	18.1		19.5	18.9	
Level of Service	E	B		F	C		B	B		B	B	
Approach Delay (s)		23.2			37.3			18.5			19.1	
Approach LOS		C			D			B			B	

Intersection Summary			
HCM Average Control Delay	28.3	HCM Level of Service	C
HCM Volume to Capacity ratio	0.68		
Actuated Cycle Length (s)	63.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	76.4%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1813		1736	1790		1736	1677		1736	1576	
Flt Permitted	0.95	1.00		0.95	1.00		0.51	1.00		0.72	1.00	
Satd. Flow (perm)	1736	1813		1736	1790		933	1677		1309	1576	
Volume (vph)	176	813	45	29	828	130	69	28	34	91	20	215
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	176	813	45	29	828	130	69	28	34	91	20	215
RTOR Reduction (vph)	0	3	0	0	9	0	0	25	0	0	156	0
Lane Group Flow (vph)	176	855	0	29	949	0	69	37	0	91	79	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Effective Green, g (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Actuated g/C Ratio	0.08	0.51		0.03	0.46		0.27	0.27		0.27	0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	139	924		45	815		254	457		357	429	
v/s Ratio Prot	c0.10	c0.47		0.02	c0.53			0.02			0.05	
v/s Ratio Perm							c0.07			0.07		
v/c Ratio	1.27	0.93		0.64	1.16		0.27	0.08		0.25	0.18	
Uniform Delay, d1	28.7	14.2		30.1	17.0		17.8	16.9		17.7	17.4	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	164.6	14.7		27.5	87.1		2.6	0.3		1.7	0.9	
Delay (s)	193.3	28.9		57.6	104.1		20.5	17.2		19.5	18.3	
Level of Service	F	C		E	F		C	B		B	B	
Approach Delay (s)		56.9			102.8			18.9			18.6	
Approach LOS		E			F			B			B	

Intersection Summary			
HCM Average Control Delay	68.1	HCM Level of Service	E
HCM Volume to Capacity ratio	0.91		
Actuated Cycle Length (s)	62.4	Sum of lost time (s)	16.0
Intersection Capacity Utilization	92.7%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1813		1736	1789		1736	1677		1736	1576	
Flt Permitted	0.95	1.00		0.95	1.00		0.51	1.00		0.72	1.00	
Satd. Flow (perm)	1736	1813		1736	1789		933	1677		1309	1576	
Volume (vph)	176	840	45	29	844	134	69	28	34	97	20	215
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	176	840	45	29	844	134	69	28	34	97	20	215
RTOR Reduction (vph)	0	3	0	0	9	0	0	25	0	0	156	0
Lane Group Flow (vph)	176	882	0	29	969	0	69	37	0	97	79	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Effective Green, g (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Actuated g/C Ratio	0.08	0.51		0.03	0.46		0.27	0.27		0.27	0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	139	924		45	814		254	457		357	429	
v/s Ratio Prot	c0.10	c0.49		0.02	c0.54			0.02			0.05	
v/s Ratio Perm							0.07			c0.07		
v/c Ratio	1.27	0.95		0.64	1.19		0.27	0.08		0.27	0.18	
Uniform Delay, d1	28.7	14.6		30.1	17.0		17.8	16.9		17.8	17.4	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	164.6	19.4		27.5	97.7		2.6	0.3		1.9	0.9	
Delay (s)	193.3	34.0		57.6	114.7		20.5	17.2		19.7	18.3	
Level of Service	F	C		E	F		C	B		B	B	
Approach Delay (s)		60.4			113.0			18.9			18.7	
Approach LOS		E			F			B			B	

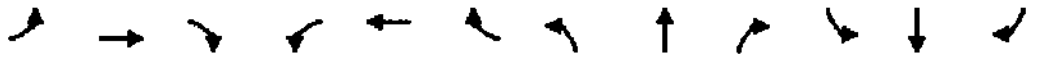
Intersection Summary			
HCM Average Control Delay	73.7	HCM Level of Service	E
HCM Volume to Capacity ratio	0.93		
Actuated Cycle Length (s)	62.4	Sum of lost time (s)	16.0
Intersection Capacity Utilization	93.8%	ICU Level of Service	F
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Frt	1.00	0.99		1.00	0.98		1.00	0.92		1.00	0.86	
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	
Satd. Flow (prot)	1736	1813		1736	1789		1736	1677		1736	1576	
Flt Permitted	0.95	1.00		0.95	1.00		0.51	1.00		0.72	1.00	
Satd. Flow (perm)	1736	1813		1736	1789		933	1677		1309	1576	
Volume (vph)	176	850	45	29	852	135	69	28	34	96	20	215
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	176	850	45	29	852	135	69	28	34	96	20	215
RTOR Reduction (vph)	0	3	0	0	9	0	0	25	0	0	156	0
Lane Group Flow (vph)	176	892	0	29	978	0	69	37	0	96	79	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Effective Green, g (s)	5.0	31.8		1.6	28.4		17.0	17.0		17.0	17.0	
Actuated g/C Ratio	0.08	0.51		0.03	0.46		0.27	0.27		0.27	0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0		3.0	3.0		3.0	3.0	
Lane Grp Cap (vph)	139	924		45	814		254	457		357	429	
v/s Ratio Prot	c0.10	c0.49		0.02	c0.55			0.02			0.05	
v/s Ratio Perm							c0.07			0.07		
v/c Ratio	1.27	0.97		0.64	1.20		0.27	0.08		0.27	0.18	
Uniform Delay, d1	28.7	14.8		30.1	17.0		17.8	16.9		17.8	17.4	
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00	
Incremental Delay, d2	164.6	21.4		27.5	102.2		2.6	0.3		1.8	0.9	
Delay (s)	193.3	36.2		57.6	119.2		20.5	17.2		19.7	18.3	
Level of Service	F	D		E	F		C	B		B	B	
Approach Delay (s)		62.0			117.5			18.9			18.7	
Approach LOS		E			F			B			B	

Intersection Summary			
HCM Average Control Delay	76.3	HCM Level of Service	E
HCM Volume to Capacity ratio	0.94		
Actuated Cycle Length (s)	62.4	Sum of lost time (s)	16.0
Intersection Capacity Utilization	94.3%	ICU Level of Service	F
Analysis Period (min)	15		

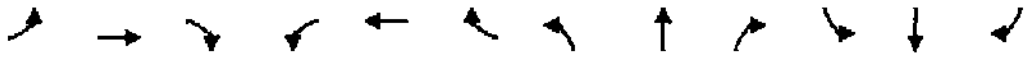
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.98			0.96			0.93	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1810		1736	1794			1737			1678	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.92	
Satd. Flow (perm)	1736	1810		1736	1794			1680			1568	
Volume (vph)	121	213	14	52	137	19	8	26	15	62	51	120
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	121	213	14	52	137	19	8	26	15	62	51	120
RTOR Reduction (vph)	0	4	0	0	10	0	0	8	0	0	50	0
Lane Group Flow (vph)	121	223	0	52	146	0	0	41	0	0	183	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.8	14.7		3.3	10.2			23.8			23.8	
Effective Green, g (s)	7.8	14.7		3.3	10.2			23.8			23.8	
Actuated g/C Ratio	0.14	0.27		0.06	0.19			0.44			0.44	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	252	495		106	340			743			694	
v/s Ratio Prot	c0.07	c0.12		0.03	0.08							
v/s Ratio Perm								0.02			c0.12	
v/c Ratio	0.48	0.45		0.49	0.43			0.05			0.26	
Uniform Delay, d1	21.1	16.2		24.4	19.2			8.6			9.5	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	1.4	0.7		3.5	0.9			0.1			0.9	
Delay (s)	22.6	16.9		28.0	20.1			8.7			10.4	
Level of Service	C	B		C	C			A			B	
Approach Delay (s)		18.8			22.1			8.7			10.4	
Approach LOS		B			C			A			B	

Intersection Summary			
HCM Average Control Delay	16.7	HCM Level of Service	B
HCM Volume to Capacity ratio	0.34		
Actuated Cycle Length (s)	53.8	Sum of lost time (s)	8.0
Intersection Capacity Utilization	45.5%	ICU Level of Service	A
Analysis Period (min)	15		

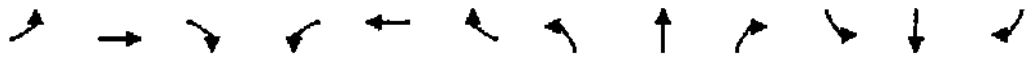
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.96			0.93	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1811		1736	1772			1737			1676	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.90	
Satd. Flow (perm)	1736	1811		1736	1772			1674			1540	
Volume (vph)	131	222	14	52	147	37	8	26	15	82	51	137
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	131	222	14	52	147	37	8	26	15	82	51	137
RTOR Reduction (vph)	0	4	0	0	18	0	0	8	0	0	49	0
Lane Group Flow (vph)	131	232	0	52	166	0	0	41	0	0	221	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.8	15.3		3.0	10.5			24.0			24.0	
Effective Green, g (s)	7.8	15.3		3.0	10.5			24.0			24.0	
Actuated g/C Ratio	0.14	0.28		0.06	0.19			0.44			0.44	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	249	510		96	343			740			681	
v/s Ratio Prot	c0.08	c0.13		0.03	0.09							
v/s Ratio Perm								0.02			c0.14	
v/c Ratio	0.53	0.45		0.54	0.48			0.05			0.32	
Uniform Delay, d1	21.5	16.1		25.0	19.5			8.7			9.9	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	2.0	0.6		6.1	1.1			0.1			1.3	
Delay (s)	23.5	16.7		31.1	20.6			8.8			11.1	
Level of Service	C	B		C	C			A			B	
Approach Delay (s)		19.1			22.9			8.8			11.1	
Approach LOS		B			C			A			B	

Intersection Summary			
HCM Average Control Delay	17.2	HCM Level of Service	B
HCM Volume to Capacity ratio	0.38		
Actuated Cycle Length (s)	54.3	Sum of lost time (s)	8.0
Intersection Capacity Utilization	49.5%	ICU Level of Service	A
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.95			0.93	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.98	
Satd. Flow (prot)	1736	1812		1736	1775			1725			1677	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.90	
Satd. Flow (perm)	1736	1812		1736	1775			1668			1536	
Volume (vph)	131	236	14	60	183	43	8	26	19	84	51	137
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	131	236	14	60	183	43	8	26	19	84	51	137
RTOR Reduction (vph)	0	4	0	0	16	0	0	10	0	0	50	0
Lane Group Flow (vph)	131	246	0	60	210	0	0	43	0	0	222	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.4	14.0		3.9	10.5			24.8			24.8	
Effective Green, g (s)	7.4	14.0		3.9	10.5			24.8			24.8	
Actuated g/C Ratio	0.14	0.26		0.07	0.19			0.45			0.45	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	235	464		124	341			756			696	
v/s Ratio Prot	c0.08	c0.14		0.03	0.12							
v/s Ratio Perm								0.03			c0.14	
v/c Ratio	0.56	0.53		0.48	0.62			0.06			0.32	
Uniform Delay, d1	22.1	17.5		24.4	20.2			8.4			9.6	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	2.9	1.2		3.0	3.3			0.1			1.2	
Delay (s)	25.0	18.7		27.4	23.5			8.5			10.8	
Level of Service	C	B		C	C			A			B	
Approach Delay (s)		20.9			24.3			8.5			10.8	
Approach LOS		C			C			A			B	

Intersection Summary			
HCM Average Control Delay	18.4	HCM Level of Service	B
HCM Volume to Capacity ratio	0.43		
Actuated Cycle Length (s)	54.7	Sum of lost time (s)	12.0
Intersection Capacity Utilization	51.9%	ICU Level of Service	A
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.95			0.93	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.98	
Satd. Flow (prot)	1736	1812		1736	1775			1720			1677	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.90	
Satd. Flow (perm)	1736	1812		1736	1775			1664			1533	
Volume (vph)	131	240	14	61	187	44	8	26	21	85	51	137
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	131	240	14	61	187	44	8	26	21	85	51	137
RTOR Reduction (vph)	0	4	0	0	16	0	0	12	0	0	50	0
Lane Group Flow (vph)	131	250	0	61	215	0	0	44	0	0	223	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.3	14.0		3.9	10.6			24.7			24.7	
Effective Green, g (s)	7.3	14.0		3.9	10.6			24.7			24.7	
Actuated g/C Ratio	0.13	0.26		0.07	0.19			0.45			0.45	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	232	465		124	345			753			694	
v/s Ratio Prot	c0.08	c0.14		0.04	0.12							
v/s Ratio Perm								0.03			c0.15	
v/c Ratio	0.56	0.54		0.49	0.62			0.06			0.32	
Uniform Delay, d1	22.2	17.5		24.4	20.2			8.4			9.6	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	3.1	1.2		3.1	3.5			0.1			1.2	
Delay (s)	25.3	18.7		27.4	23.6			8.6			10.8	
Level of Service	C	B		C	C			A			B	
Approach Delay (s)		21.0			24.4			8.6			10.8	
Approach LOS		C			C			A			B	

Intersection Summary			
HCM Average Control Delay	18.5	HCM Level of Service	B
HCM Volume to Capacity ratio	0.44		
Actuated Cycle Length (s)	54.6	Sum of lost time (s)	12.0
Intersection Capacity Utilization	52.2%	ICU Level of Service	A
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	1.00		1.00	0.98			0.91			0.90	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1818		1736	1799			1654			1633	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.94	
Satd. Flow (perm)	1736	1818		1736	1799			1594			1555	
Volume (vph)	157	336	11	23	228	26	7	10	32	54	26	212
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	157	336	11	23	228	26	7	10	32	54	26	212
RTOR Reduction (vph)	0	2	0	0	7	0	0	20	0	0	135	0
Lane Group Flow (vph)	157	345	0	23	247	0	0	29	0	0	157	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.9	21.4		0.8	14.3			19.4			19.4	
Effective Green, g (s)	7.9	21.4		0.8	14.3			19.4			19.4	
Actuated g/C Ratio	0.15	0.40		0.01	0.27			0.36			0.36	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	256	726		26	480			577			563	
v/s Ratio Prot	c0.09	c0.19		0.01	0.14							
v/s Ratio Perm								0.02			c0.10	
v/c Ratio	0.61	0.48		0.88	0.51			0.05			0.28	
Uniform Delay, d1	21.4	11.9		26.4	16.7			11.1			12.1	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	4.3	0.5		125.5	0.9			0.2			1.2	
Delay (s)	25.7	12.4		151.9	17.6			11.3			13.4	
Level of Service	C	B		F	B			B			B	
Approach Delay (s)		16.6			28.8			11.3			13.4	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	18.5	HCM Level of Service	B
HCM Volume to Capacity ratio	0.40		
Actuated Cycle Length (s)	53.6	Sum of lost time (s)	8.0
Intersection Capacity Utilization	56.3%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	1.00		1.00	0.98			0.91			0.90	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1819		1736	1797			1649			1634	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.94	
Satd. Flow (perm)	1736	1819		1736	1797			1593			1552	
Volume (vph)	157	350	11	31	264	32	7	10	36	56	26	212
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	157	350	11	31	264	32	7	10	36	56	26	212
RTOR Reduction (vph)	0	2	0	0	7	0	0	23	0	0	134	0
Lane Group Flow (vph)	157	359	0	31	289	0	0	30	0	0	160	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.8	20.7		1.7	14.6			20.0			20.0	
Effective Green, g (s)	7.8	20.7		1.7	14.6			20.0			20.0	
Actuated g/C Ratio	0.14	0.38		0.03	0.27			0.37			0.37	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	249	692		54	482			586			571	
v/s Ratio Prot	c0.09	c0.20		0.02	0.16							
v/s Ratio Perm								0.02			c0.10	
v/c Ratio	0.63	0.52		0.57	0.60			0.05			0.28	
Uniform Delay, d1	21.9	13.0		26.0	17.3			11.1			12.1	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	5.1	0.7		13.9	2.0			0.2			1.2	
Delay (s)	27.1	13.7		39.9	19.4			11.3			13.3	
Level of Service	C	B		D	B			B			B	
Approach Delay (s)		17.7			21.3			11.3			13.3	
Approach LOS		B			C			B			B	

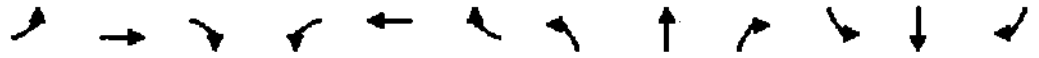
Intersection Summary			
HCM Average Control Delay	17.3	HCM Level of Service	B
HCM Volume to Capacity ratio	0.42		
Actuated Cycle Length (s)	54.4	Sum of lost time (s)	8.0
Intersection Capacity Utilization	58.7%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	1.00		1.00	0.98			0.91			0.90	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1819		1736	1797			1646			1634	
Flt Permitted	0.95	1.00		0.95	1.00			0.96			0.94	
Satd. Flow (perm)	1736	1819		1736	1797			1592			1550	
Volume (vph)	157	354	11	32	268	33	7	10	38	57	26	212
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	157	354	11	32	268	33	7	10	38	57	26	212
RTOR Reduction (vph)	0	2	0	0	7	0	0	24	0	0	135	0
Lane Group Flow (vph)	157	363	0	32	294	0	0	31	0	0	160	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.8	20.9		1.7	14.8			19.9			19.9	
Effective Green, g (s)	7.8	20.9		1.7	14.8			19.9			19.9	
Actuated g/C Ratio	0.14	0.38		0.03	0.27			0.37			0.37	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	248	698		54	488			581			566	
v/s Ratio Prot	c0.09	c0.20		0.02	0.16							
v/s Ratio Perm								0.02			c0.10	
v/c Ratio	0.63	0.52		0.59	0.60			0.05			0.28	
Uniform Delay, d1	22.0	12.9		26.1	17.3			11.2			12.3	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	5.2	0.7		16.2	2.1			0.2			1.3	
Delay (s)	27.2	13.6		42.3	19.4			11.4			13.5	
Level of Service	C	B		D	B			B			B	
Approach Delay (s)		17.7			21.6			11.4			13.5	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	17.5	HCM Level of Service	B
HCM Volume to Capacity ratio	0.42		
Actuated Cycle Length (s)	54.5	Sum of lost time (s)	8.0
Intersection Capacity Utilization	59.0%	ICU Level of Service	B
Analysis Period (min)	15		

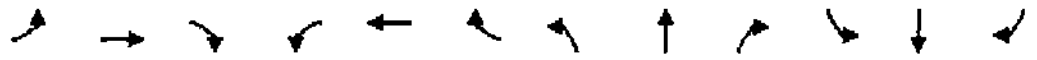
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.94			0.91	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1801		1736	1775			1700			1653	
Flt Permitted	0.95	1.00		0.95	1.00			0.89			0.94	
Satd. Flow (perm)	1736	1801		1736	1775			1536			1569	
Volume (vph)	194	179	19	71	308	72	37	56	72	42	58	190
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	194	179	19	71	308	72	37	56	72	42	58	190
RTOR Reduction (vph)	0	7	0	0	15	0	0	43	0	0	106	0
Lane Group Flow (vph)	194	191	0	71	365	0	0	122	0	0	184	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.8	20.2		3.2	15.6			19.2			19.2	
Effective Green, g (s)	7.8	20.2		3.2	15.6			19.2			19.2	
Actuated g/C Ratio	0.14	0.37		0.06	0.29			0.35			0.35	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	248	666		102	507			540			552	
v/s Ratio Prot	c0.11	0.11		0.04	c0.21							
v/s Ratio Perm								0.08			c0.12	
v/c Ratio	0.78	0.29		0.70	0.72			0.23			0.33	
Uniform Delay, d1	22.6	12.1		25.2	17.5			12.5			13.0	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	14.8	0.2		18.6	4.9			1.0			1.6	
Delay (s)	37.4	12.4		43.9	22.4			13.4			14.6	
Level of Service	D	B		D	C			B			B	
Approach Delay (s)		24.7			25.8			13.4			14.6	
Approach LOS		C			C			B			B	

Intersection Summary			
HCM Average Control Delay	21.4	HCM Level of Service	C
HCM Volume to Capacity ratio	0.56		
Actuated Cycle Length (s)	54.6	Sum of lost time (s)	12.0
Intersection Capacity Utilization	61.7%	ICU Level of Service	B
Analysis Period (min)	15		

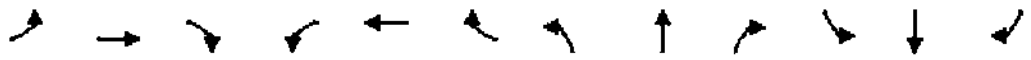
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.96			0.94			0.92	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1802		1736	1762			1700			1658	
Flt Permitted	0.95	1.00		0.95	1.00			0.90			0.90	
Satd. Flow (perm)	1736	1802		1736	1762			1541			1509	
Volume (vph)	209	187	19	71	320	100	37	56	72	74	58	206
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	209	187	19	71	320	100	37	56	72	74	58	206
RTOR Reduction (vph)	0	6	0	0	19	0	0	43	0	0	88	0
Lane Group Flow (vph)	209	200	0	71	401	0	0	122	0	0	250	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	7.9	21.3		3.2	16.6			18.9			18.9	
Effective Green, g (s)	7.9	21.3		3.2	16.6			18.9			18.9	
Actuated g/C Ratio	0.14	0.38		0.06	0.30			0.34			0.34	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	248	693		100	528			526			515	
v/s Ratio Prot	c0.12	0.11		0.04	c0.23							
v/s Ratio Perm								0.08			c0.17	
v/c Ratio	0.84	0.29		0.71	0.76			0.23			0.48	
Uniform Delay, d1	23.1	11.8		25.6	17.6			13.1			14.4	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	22.1	0.2		20.6	6.2			1.0			3.2	
Delay (s)	45.2	12.0		46.2	23.8			14.1			17.7	
Level of Service	D	B		D	C			B			B	
Approach Delay (s)		28.7			27.0			14.1			17.7	
Approach LOS		C			C			B			B	

Intersection Summary			
HCM Average Control Delay	23.8	HCM Level of Service	C
HCM Volume to Capacity ratio	0.66		
Actuated Cycle Length (s)	55.4	Sum of lost time (s)	12.0
Intersection Capacity Utilization	70.8%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.94			0.92	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1806		1736	1763			1692			1660	
Flt Permitted	0.95	1.00		0.95	1.00			0.90			0.90	
Satd. Flow (perm)	1736	1806		1736	1763			1546			1504	
Volume (vph)	209	235	19	83	343	104	37	56	84	80	58	206
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	209	235	19	83	343	104	37	56	84	80	58	206
RTOR Reduction (vph)	0	5	0	0	19	0	0	53	0	0	89	0
Lane Group Flow (vph)	209	249	0	83	428	0	0	124	0	0	255	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.5	24.0		4.0	18.5			19.1			19.1	
Effective Green, g (s)	9.5	24.0		4.0	18.5			19.1			19.1	
Actuated g/C Ratio	0.16	0.41		0.07	0.31			0.32			0.32	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	279	733		117	552			500			486	
v/s Ratio Prot	c0.12	0.14		0.05	c0.24							
v/s Ratio Perm								0.08			c0.17	
v/c Ratio	0.75	0.34		0.71	0.78			0.25			0.53	
Uniform Delay, d1	23.7	12.1		27.0	18.4			14.7			16.3	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	10.5	0.3		17.8	6.8			1.2			4.0	
Delay (s)	34.2	12.4		44.8	25.2			15.9			20.3	
Level of Service	C	B		D	C			B			C	
Approach Delay (s)		22.2			28.3			15.9			20.3	
Approach LOS		C			C			B			C	

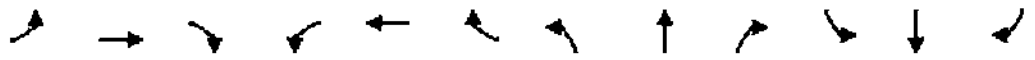
Intersection Summary			
HCM Average Control Delay	23.2	HCM Level of Service	C
HCM Volume to Capacity ratio	0.67		
Actuated Cycle Length (s)	59.1	Sum of lost time (s)	12.0
Intersection Capacity Utilization	73.9%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.94			0.92	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1807		1736	1763			1692			1660	
Flt Permitted	0.95	1.00		0.95	1.00			0.90			0.90	
Satd. Flow (perm)	1736	1807		1736	1763			1541			1509	
Volume (vph)	209	237	19	85	347	105	37	56	85	81	58	206
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	209	237	19	85	347	105	37	56	85	81	58	206
RTOR Reduction (vph)	0	5	0	0	18	0	0	54	0	0	88	0
Lane Group Flow (vph)	209	251	0	85	434	0	0	124	0	0	257	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.4	24.4		4.0	19.0			18.1			18.1	
Effective Green, g (s)	9.4	24.4		4.0	19.0			18.1			18.1	
Actuated g/C Ratio	0.16	0.42		0.07	0.32			0.31			0.31	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	279	754		119	573			477			467	
v/s Ratio Prot	c0.12	0.14		0.05	c0.25							
v/s Ratio Perm								0.08			c0.17	
v/c Ratio	0.75	0.33		0.71	0.76			0.26			0.55	
Uniform Delay, d1	23.4	11.5		26.7	17.7			15.2			16.8	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	10.5	0.3		18.3	5.7			1.3			4.6	
Delay (s)	33.9	11.8		45.0	23.4			16.5			21.4	
Level of Service	C	B		D	C			B			C	
Approach Delay (s)		21.7			26.8			16.5			21.4	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	22.8	HCM Level of Service	C
HCM Volume to Capacity ratio	0.68		
Actuated Cycle Length (s)	58.5	Sum of lost time (s)	12.0
Intersection Capacity Utilization	74.4%	ICU Level of Service	D
Analysis Period (min)	15		

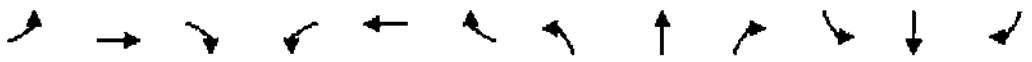
c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.97			0.93			0.92	
Flt Protected	0.95	1.00		0.95	1.00			0.99			0.99	
Satd. Flow (prot)	1736	1808		1736	1764			1690			1660	
Flt Permitted	0.95	1.00		0.95	1.00			0.90			0.90	
Satd. Flow (perm)	1736	1808		1736	1764			1542			1508	
Volume (vph)	209	252	19	91	369	110	37	56	88	82	58	206
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	209	252	19	91	369	110	37	56	88	82	58	206
RTOR Reduction (vph)	0	4	0	0	18	0	0	56	0	0	87	0
Lane Group Flow (vph)	209	267	0	91	461	0	0	125	0	0	259	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.5	22.1		6.0	18.6			18.1			18.1	
Effective Green, g (s)	9.5	22.1		6.0	18.6			18.1			18.1	
Actuated g/C Ratio	0.16	0.38		0.10	0.32			0.31			0.31	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	283	687		179	564			480			469	
v/s Ratio Prot	c0.12	c0.15		0.05	c0.26							
v/s Ratio Perm								0.08			c0.17	
v/c Ratio	0.74	0.39		0.51	0.82			0.26			0.55	
Uniform Delay, d1	23.2	13.1		24.7	18.2			15.0			16.7	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	9.7	0.4		2.3	8.9			1.3			4.6	
Delay (s)	32.8	13.5		27.0	27.2			16.4			21.3	
Level of Service	C	B		C	C			B			C	
Approach Delay (s)		21.9			27.1			16.4			21.3	
Approach LOS		C			C			B			C	

Intersection Summary			
HCM Average Control Delay	23.0	HCM Level of Service	C
HCM Volume to Capacity ratio	0.74		
Actuated Cycle Length (s)	58.2	Sum of lost time (s)	16.0
Intersection Capacity Utilization	76.3%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.98			0.93			0.89	
Flt Protected	0.95	1.00		0.95	1.00			0.98			1.00	
Satd. Flow (prot)	1736	1809		1736	1788			1678			1616	
Flt Permitted	0.95	1.00		0.95	1.00			0.80			0.97	
Satd. Flow (perm)	1736	1809		1736	1788			1355			1572	
Volume (vph)	217	262	18	70	438	73	47	30	77	28	32	288
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	217	262	18	70	438	73	47	30	77	28	32	288
RTOR Reduction (vph)	0	4	0	0	10	0	0	56	0	0	209	0
Lane Group Flow (vph)	217	276	0	70	501	0	0	98	0	0	139	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	10.1	27.1		3.4	20.4			16.1			16.1	
Effective Green, g (s)	10.1	27.1		3.4	20.4			16.1			16.1	
Actuated g/C Ratio	0.17	0.46		0.06	0.35			0.27			0.27	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	299	837		101	622			372			432	
v/s Ratio Prot	c0.13	0.15		0.04	c0.28							
v/s Ratio Perm								0.07			c0.09	
v/c Ratio	0.73	0.33		0.69	0.81			0.26			0.32	
Uniform Delay, d1	22.9	10.0		27.1	17.3			16.6			16.9	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	8.5	0.2		18.6	7.5			1.7			2.0	
Delay (s)	31.4	10.2		45.7	24.8			18.3			18.9	
Level of Service	C	B		D	C			B			B	
Approach Delay (s)		19.5			27.3			18.3			18.9	
Approach LOS		B			C			B			B	

Intersection Summary			
HCM Average Control Delay	22.1	HCM Level of Service	C
HCM Volume to Capacity ratio	0.62		
Actuated Cycle Length (s)	58.6	Sum of lost time (s)	12.0
Intersection Capacity Utilization	71.6%	ICU Level of Service	C
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.98			0.93			0.89	
Flt Protected	0.95	1.00		0.95	1.00			0.99			1.00	
Satd. Flow (prot)	1736	1810		1736	1788			1671			1618	
Flt Permitted	0.95	1.00		0.95	1.00			0.82			0.96	
Satd. Flow (perm)	1736	1810		1736	1788			1382			1562	
Volume (vph)	217	280	18	82	461	77	47	30	89	34	32	288
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	217	280	18	82	461	77	47	30	89	34	32	288
RTOR Reduction (vph)	0	3	0	0	10	0	0	64	0	0	206	0
Lane Group Flow (vph)	217	295	0	82	528	0	0	102	0	0	148	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.5	26.7		4.1	21.3			17.1			17.1	
Effective Green, g (s)	9.5	26.7		4.1	21.3			17.1			17.1	
Actuated g/C Ratio	0.16	0.45		0.07	0.36			0.29			0.29	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	275	807		119	636			395			446	
v/s Ratio Prot	c0.13	0.16		0.05	c0.30							
v/s Ratio Perm								0.07			c0.09	
v/c Ratio	0.79	0.37		0.69	0.83			0.26			0.33	
Uniform Delay, d1	24.2	11.0		27.3	17.7			16.5			16.9	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	13.9	0.3		15.3	9.0			1.6			2.0	
Delay (s)	38.2	11.3		42.6	26.7			18.1			18.9	
Level of Service	D	B		D	C			B			B	
Approach Delay (s)		22.6			28.8			18.1			18.9	
Approach LOS		C			C			B			B	

Intersection Summary			
HCM Average Control Delay	23.7	HCM Level of Service	C
HCM Volume to Capacity ratio	0.64		
Actuated Cycle Length (s)	59.9	Sum of lost time (s)	12.0
Intersection Capacity Utilization	73.9%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Lane Util. Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Frt	1.00	0.99		1.00	0.98			0.93			0.89	
Flt Protected	0.95	1.00		0.95	1.00			0.99			1.00	
Satd. Flow (prot)	1736	1812		1736	1788			1670			1619	
Flt Permitted	0.95	1.00		0.95	1.00			0.82			0.96	
Satd. Flow (perm)	1736	1812		1736	1788			1391			1560	
Volume (vph)	217	312	18	84	465	78	47	30	90	35	32	288
Peak-hour factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj. Flow (vph)	217	312	18	84	465	78	47	30	90	35	32	288
RTOR Reduction (vph)	0	3	0	0	10	0	0	64	0	0	205	0
Lane Group Flow (vph)	217	327	0	84	533	0	0	103	0	0	150	0
Turn Type	Prot			Prot			Perm			Perm		
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2			6		
Actuated Green, G (s)	9.6	24.7		5.4	20.5			17.1			17.1	
Effective Green, g (s)	9.6	24.7		5.4	20.5			17.1			17.1	
Actuated g/C Ratio	0.16	0.42		0.09	0.35			0.29			0.29	
Clearance Time (s)	4.0	4.0		4.0	4.0			4.0			4.0	
Vehicle Extension (s)	3.0	3.0		3.0	3.0			3.0			3.0	
Lane Grp Cap (vph)	282	756		158	619			402			451	
v/s Ratio Prot	c0.13	0.18		0.05	c0.30							
v/s Ratio Perm								0.07			c0.10	
v/c Ratio	0.77	0.43		0.53	0.86			0.26			0.33	
Uniform Delay, d1	23.7	12.3		25.7	18.0			16.2			16.6	
Progression Factor	1.00	1.00		1.00	1.00			1.00			1.00	
Incremental Delay, d2	11.9	0.4		3.4	11.8			1.5			2.0	
Delay (s)	35.7	12.7		29.1	29.8			17.7			18.5	
Level of Service	D	B		C	C			B			B	
Approach Delay (s)		21.8			29.7			17.7			18.5	
Approach LOS		C			C			B			B	

Intersection Summary			
HCM Average Control Delay	23.6	HCM Level of Service	C
HCM Volume to Capacity ratio	0.65		
Actuated Cycle Length (s)	59.2	Sum of lost time (s)	12.0
Intersection Capacity Utilization	74.3%	ICU Level of Service	D
Analysis Period (min)	15		

c Critical Lane Group

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_EX_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*A.M. PEAK HOUR*		
Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*		
East/West Street:	*SR 246-ARMOUR RANCH RD.*	North/South Street:	*SR 154*
Intersection Orientation:	*North-South*	Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*136*	*102*	*2*	*2*	*193*	*20*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*136*	*102*	*2*	*2*	*193*	*20*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*8*	*25*	*276*	*0*	*24*	*2*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*8*	*25*	*276*	*0*	*24*	*2*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*136*	*2*		*26*		*33*		*276*
C (m) (veh/h)	*1368*	*1475*		*416*		*380*		*843*
v/c	*0.10*	*0.00*		*0.06*		*0.09*		*0.33*
95% queue length	*0.33*	*0.00*		*0.20*		*0.28*		*1.45*
Control Delay (s/veh)	*7.9*	*7.4*		*14.5*		*15.4*		*11.3*
LOS	*A*	*A*		*B*		*C*		*B*
Approach Delay (s/veh)	--	--	*14.5*			*11.8*		
Approach LOS	--	--	*B*			*B*		

AWD = 10.8 SEC - LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_2014_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*158*	*113*	*2*	*2*	*207*	*26*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*158*	*113*	*2*	*2*	*207*	*26*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*12*	*25*	*297*	*0*	*24*	*2*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*12*	*25*	*297*	*0*	*24*	*2*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*158*	*2*		*26*		*37*		*297*
C (m) (veh/h)	*1352*	*1462*		*373*		*337*		*828*
v/c	*0.12*	*0.00*		*0.07*		*0.11*		*0.36*
95% queue length	*0.40*	*0.00*		*0.22*		*0.37*		*1.67*
Control Delay (s/veh)	*8.0*	*7.5*		*15.7*		*17.0*		*11.8*
LOS	*A*	*A*		*C*		*C*		*B*
Approach Delay (s/veh)	--	--	*15.7*			*12.4*		
Approach LOS	--	--	*C*			*B*		

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_2014+ALT. 1_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*2014+PROJECT (ALT. 1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*158*	*113*	*5*	*3*	*207*	*26*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*158*	*113*	*5*	*3*	*207*	*26*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*12*	*46*	*297*	*8*	*88*	*5*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*12*	*46*	*297*	*8*	*88*	*5*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*158*	*3*		*101*		*58*		*297*
C (m) (veh/h)	*1352*	*1458*		*338*		*320*		*828*
v/c	*0.12*	*0.00*		*0.30*		*0.18*		*0.36*
95% queue length	*0.40*	*0.01*		*1.26*		*0.66*		*1.67*
Control Delay (s/veh)	*8.0*	*7.5*		*20.4*		*18.7*		*11.8*
LOS	*A*	*A*		*C*		*C*		*B*
Approach Delay (s/veh)	--	--	*20.4*			*12.9*		
Approach LOS	--	--	*C*			*B*		

AVG = 12.9 sec = LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_2014+ALT. 2_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*2014+PROJECT (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 246-ARMOUR RANCH RD.* | North/South Street: *SR 154*

Intersection Orientation: *North-South* | Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*158*	*113*	*6*	*3*	*207*	*26*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*158*	*113*	*6*	*3*	*207*	*26*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*12*	*53*	*297*	*8*	*94*	*5*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*12*	*53*	*297*	*8*	*94*	*5*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*158*	*3*		*107*		*65*		*297*
C (m) (veh/h)	*1352*	*1457*		*337*		*320*		*828*
v/c	*0.12*	*0.00*		*0.32*		*0.20*		*0.36*
95% queue length	*0.40*	*0.01*		*1.38*		*0.76*		*1.67*
Control Delay (s/veh)	*8.0*	*7.5*		*20.8*		*19.1*		*11.8*
LOS	*A*	*A*		*C*		*C*		*B*
Approach Delay (s/veh)	--	--	*20.8*			*13.1*		
Approach LOS	--	--	*C*			*B*		

AM = 13.1 sec LOS B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_CU_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*	
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*225*	*235*	*5*	*5*	*194*	*124*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*225*	*235*	*5*	*5*	*194*	*124*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*138*	*30*	*226*	*5*	*30*	*5*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*138*	*30*	*226*	*5*	*30*	*5*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*225*	*5*		*40*		*168*		*226*
C (m) (veh/h)	*1367*	*1315*		*240*		*204*		*842*
v/c	*0.16*	*0.00*		*0.17*		*0.82*		*0.27*
95% queue length	*0.59*	*0.01*		*0.60*		*9.25*		*1.10*
Control Delay (s/veh)	*8.2*	*7.7*		*23.6*		*90.5*		*10.8*
LOS	*A*	*A*		*C*		*F*		*B*
Approach Delay (s/veh)	--	--	*23.6*			*44.8*		
Approach LOS	--	--	*C*			*E*		

AM = 30.8 sec = LOS D

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_CU+PR (ALT. 1)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE+PR (ALT.1)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*225*	*235*	*8*	*6*	*194*	*124*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*225*	*235*	*8*	*6*	*194*	*124*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*138*	*51*	*226*	*13*	*94*	*8*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*138*	*51*	*226*	*13*	*94*	*8*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*225*	*6*		*115*		*189*		*226*
C (m) (veh/h)	*1367*	*1312*		*224*		*158*		*842*
v/c	*0.16*	*0.00*		*0.51*		*1.20*		*0.27*
95% queue length	*0.59*	*0.01*		*3.00*		*26.29*		*1.10*
Control Delay (s/veh)	*8.2*	*7.8*		*38.2*		*487.6*		*10.8*
LOS	*A*	*A*		*E*		*F*		*B*
Approach Delay (s/veh)	--	--	*38.2*			*228.0*		
Approach LOS	--	--	*E*			*F*		

TWO-WAY STOP CONTROL SUMMARY			
General Information		**Site Information**	
Analyst	*MMF*	Intersection	*10_CU+PR (ALT. 2)_AM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*A.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	225	235	9	6	194	124
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	225	235	9	6	194	124
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			1
Lanes	1	1	0	1	1	1
Configuration	L		TR	L	T	R
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	138	58	226	13	100	8
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	138	58	226	13	100	8
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		N			Y	
Storage		0			2	
RT Channelized			1			0
Lanes	0	1	1	0	1	0
Configuration	LT		R		LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR		LT		R
v (veh/h)	225	6		121		196		226
C (m) (veh/h)	1367	1311		222		156		842
v/c	0.16	0.00		0.55		1.26		0.27
95% queue length	0.59	0.01		3.37		29.85		1.10
Control Delay (s/veh)	8.2	7.8		40.5		583.6		10.8
LOS	A	A		E		F		B
Approach Delay (s/veh)	--	--	40.5			276.8		
Approach LOS	--	--	E			F		

 HCS+™ Version 5.6 Generated: 4/1/2014 2:01 PM

AWD = 7.50 sec = LOS F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_EX_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*3/21/2012*	Analysis Year	*EXISTING*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*	
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*348*	*207*	*0*	*7*	*186*	*39*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*348*	*207*	*0*	*7*	*186*	*39*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*29*	*18*	*226*	*0*	*53*	*7*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*29*	*18*	*226*	*0*	*53*	*7*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*348*	*7*		*60*		*47*		*226*
C (m) (veh/h)	*1377*	*1352*		*177*		*121*		*851*
v/c	*0.25*	*0.01*		*0.34*		*0.39*		*0.27*
95% queue length	*1.01*	*0.02*		*1.50*		*1.82*		*1.08*
Control Delay (s/veh)	*8.5*	*7.7*		*36.3*		*53.3*		*10.8*
LOS	*A*	*A*		*E*		*F*		*B*
Approach Delay (s/veh)	--	--	*36.3*			*18.1*		
Approach LOS	--	--	*E*			*C*		

AWD = 14.7 = Los B

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_2014_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*NEAR-TERM (YEAR 2014)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*376*	*224*	*0*	*7*	*209*	*49*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*376*	*224*	*0*	*7*	*209*	*49*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*40*	*18*	*259*	*0*	*53*	*7*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*40*	*18*	*259*	*0*	*53*	*7*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*376*	*7*		*60*		*58*		*259*
C (m) (veh/h)	*1350*	*1333*		*149*		*94*		*826*
v/c	*0.28*	*0.01*		*0.40*		*0.62*		*0.31*
95% queue length	*1.16*	*0.02*		*1.94*		*3.96*		*1.36*
Control Delay (s/veh)	*8.7*	*7.7*		*45.5*		*100.3*		*11.3*
LOS	*A*	*A*		*E*		*F*		*B*
Approach Delay (s/veh)	--	--	*45.5*			*27.6*		
Approach LOS	--	--	*E*			*D*		

Avg = 19.5 sec = Lev C

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	10_2014+ALT. 1_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	2014+PROJECT (ALT. 1)
Analysis Time Period	P.M. PEAK HOUR		

Project Description	#12018 - CHUMASH CAMP 4 PROJECT
East/West Street:	SR 246-ARMOUR RANCH RD.
North/South Street:	SR 154
Intersection Orientation:	North-South
Study Period (hrs):	1.00

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	376	224	9	10	209	49
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	376	224	9	10	209	49
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			1
Lanes	1	1	0	1	1	1
Configuration	L		TR	L	T	R
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	40	92	259	5	95	9
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	40	92	259	5	95	9
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		N			Y	
Storage		0			2	
RT Channelized			1			0
Lanes	0	1	1	0	1	0
Configuration	LT		R		LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR		LT		R
v (veh/h)	376	10		109		132		259
C (m) (veh/h)	1350	1323		122		84		826
v/c	0.28	0.01		0.89		1.57		0.31
95% queue length	1.16	0.02		9.94		30.49		1.36
Control Delay (s/veh)	8.7	7.7		176.6		1183		11.3
LOS	A	A		F		F		B
Approach Delay (s/veh)	--	--	176.6			407.0		
Approach LOS	--	--	F			F		

AWD = > 50 sec = LOS F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	10_2014+ALT. 2_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	4/1/14	Analysis Year	2014+PROJECT (ALT. 2)
Analysis Time Period	P.M. PEAK HOUR		

Project Description #12018 - CHUMASH CAMP 4 PROJECT

East/West Street: SR 246-ARMOUR RANCH RD.	North/South Street: SR 154
Intersection Orientation: North-South	Study Period (hrs): 1.00

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	376	224	9	10	209	49
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	376	224	9	10	209	49
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			1
Lanes	1	1	0	1	1	1
Configuration	L		TR	L	T	R
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	40	96	259	9	102	9
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	40	96	259	9	102	9
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		N			Y	
Storage		0			2	
RT Channelized			1			0
Lanes	0	1	1	0	1	0
Configuration	LT		R		LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR		LT		R
v (veh/h)	376	10		120		136		259
C (m) (veh/h)	1350	1323		110		79		826
v/c	0.28	0.01		1.09		1.72		0.31
95% queue length	1.16	0.02		16.15		34.43		1.36
Control Delay (s/veh)	8.7	7.7		385.9		1450		11.3
LOS	A	A		F		F		B
Approach Delay (s/veh)	--	--	385.9			506.7		
Approach LOS	--	--	F			F		

AWD = > 50 sec = Good F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_CU_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*1/29/14*	Analysis Year	*CUMULATIVE (YEAR 2030)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description *#12018 - CHUMASH CAMP 4 PROJECT*

East/West Street: *SR 246-ARMOUR RANCH RD.*	North/South Street: *SR 154*
Intersection Orientation: *North-South*	Study Period (hrs): *1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*386*	*407*	*5*	*10*	*212*	*147*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*386*	*407*	*5*	*10*	*212*	*147*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*119*	*20*	*230*	*5*	*55*	*10*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*119*	*20*	*230*	*5*	*55*	*10*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*386*	*10*		*70*		*139*		*230*
C (m) (veh/h)	*1347*	*1136*		*103*		*50*		*823*
v/c	*0.29*	*0.01*		*0.68*		*2.78*		*0.28*
95% queue length	*1.20*	*0.03*		*4.91*		*48.77*		*1.16*
Control Delay (s/veh)	*8.7*	*8.2*		*106.5*		*3390*		*11.1*
LOS	*A*	*A*		*F*		*F*		*B*
Approach Delay (s/veh)	--	--	*106.5*			*1284*		
Approach LOS	--	--	*F*			*F*		

 HCS+™ Version 5.6 Generated: 1/29/2014 9:21 AM

AWD = >50 sec = LOS F

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	MMF	Intersection	10_CU+PR (ALT. 1)_PM
Agency/Co.	ATE	Jurisdiction	SANTA BARBARA COUNTY
Date Performed	1/29/14	Analysis Year	CUMULATIVE+PR (ALT.1)
Analysis Time Period	P.M. PEAK HOUR		

Project Description	#12018 - CHUMASH CAMP 4 PROJECT
East/West Street: SR 246-ARMOUR RANCH RD.	North/South Street: SR 154
Intersection Orientation: North-South	Study Period (hrs): 1.00

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	386	407	14	13	212	147
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	386	407	14	13	212	147
Percent Heavy Vehicles	4	--	--	4	--	--
Median Type	Undivided					
RT Channelized			0			1
Lanes	1	1	0	1	1	1
Configuration	L		TR	L	T	R
Upstream Signal		0			0	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	119	94	230	10	97	12
Peak-Hour Factor, PHF	1.00	1.00	1.00	1.00	1.00	1.00
Hourly Flow Rate, HFR (veh/h)	119	94	230	10	97	12
Percent Heavy Vehicles	4	4	4	4	4	4
Percent Grade (%)		0			0	
Flared Approach		N			Y	
Storage		0			2	
RT Channelized			1			0
Lanes	0	1	1	0	1	0
Configuration	LT		R		LTR	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	L	L		LTR		LT		R
v (veh/h)	386	13		119		213		230
C (m) (veh/h)	1347	1127				0		823
v/c	0.29	0.01						0.28
95% queue length	1.20	0.04						1.16
Control Delay (s/veh)	8.7	8.2						11.1
LOS	A	A				F		B
Approach Delay (s/veh)	--	--						
Approach LOS	--	--						

AWSC = 7 Sec LOS = Cost

TWO-WAY STOP CONTROL SUMMARY

General Information		Site Information	
Analyst	*MMF*	Intersection	*10_CU+PR (ALT. 2)_PM*
Agency/Co.	*ATE*	Jurisdiction	*SANTA BARBARA COUNTY*
Date Performed	*4/1/14*	Analysis Year	*CUMULATIVE+PR (ALT. 2)*
Analysis Time Period	*P.M. PEAK HOUR*		

Project Description	*#12018 - CHUMASH CAMP 4 PROJECT*
East/West Street:	*SR 246-ARMOUR RANCH RD.*
North/South Street:	*SR 154*
Intersection Orientation:	*North-South*
Study Period (hrs):	*1.00*

Vehicle Volumes and Adjustments

Major Street	Northbound			Southbound		
Movement	1	2	3	4	5	6
	L	T	R	L	T	R
Volume (veh/h)	*386*	*407*	*14*	*13*	*212*	*147*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*386*	*407*	*14*	*13*	*212*	*147*
Percent Heavy Vehicles	*4*	--	--	*4*	--	--
Median Type	*Undivided*					
RT Channelized			*0*			*1*
Lanes	*1*	*1*	*0*	*1*	*1*	*1*
Configuration	*L*		*TR*	*L*	*T*	*R*
Upstream Signal		*0*			*0*	

Minor Street	Eastbound			Westbound		
Movement	7	8	9	10	11	12
	L	T	R	L	T	R
Volume (veh/h)	*119*	*98*	*230*	*11*	*104*	*12*
Peak-Hour Factor, PHF	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*	*1.00*
Hourly Flow Rate, HFR (veh/h)	*119*	*98*	*230*	*11*	*104*	*12*
Percent Heavy Vehicles	*4*	*4*	*4*	*4*	*4*	*4*
Percent Grade (%)		*0*			*0*	
Flared Approach		*N*			*Y*	
Storage		*0*			*2*	
RT Channelized			*1*			*0*
Lanes	*0*	*1*	*1*	*0*	*1*	*0*
Configuration	*LT*		*R*		*LTR*	

Delay, Queue Length, and Level of Service

Approach	Northbound	Southbound	Westbound			Eastbound		
Movement	1	4	7	8	9	10	11	12
Lane Configuration	*L*	*L*		*LTR*		*LT*		*R*
v (veh/h)	*386*	*13*		*127*		*217*		*230*
C (m) (veh/h)	*1347*	*1127*				*0*		*823*
v/c	*0.29*	*0.01*						*0.28*
95% queue length	*1.20*	*0.04*						*1.16*
Control Delay (s/veh)	*8.7*	*8.2*						*11.1*
LOS	*A*	*A*				*F*		*B*
Approach Delay (s/veh)	--	--						
Approach LOS	--	--						

AWD = 750 Sec = Lev F

TRAFFIC COUNT DATA

Prepared by NDS/ATD

VOLUME

Armour Ranch Rd E/o SR-154

Day: Tuesday
Date: 3/13/2012

City: Santa Ynez
Project #: CA12_8021_001

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	358	333	691

AM Period	NB	SB	EB		WB		TOTAL		PM Period	NB	SB	EB		WB		TOTAL	
00:00			0		0		0		12:00			6		9		15	
00:15			0		0		0		12:15			10		7		17	
00:30			0		0		0		12:30			3		5		8	
00:45			0		0		0		12:45			4	23	5	26	9	49
01:00			0		0		0		13:00			6		4		10	
01:15			0		0		0		13:15			2		5		7	
01:30			0		0		0		13:30			7		5		12	
01:45			0		0		0		13:45			8	23	11	25	19	48
02:00			0		0		0		14:00			8		8		16	
02:15			0		0		0		14:15			10		4		14	
02:30			0		0		0		14:30			6		6		12	
02:45			0		0		0		14:45			6	30	9	27	15	57
03:00			0		0		0		15:00			4		4		8	
03:15			0		0		0		15:15			4		4		8	
03:30			0		0		0		15:30			6		7		13	
03:45			0		0		0		15:45			6	20	7	22	13	42
04:00			0		0		0		16:00			2		10		12	
04:15			0		0		0		16:15			8		18		26	
04:30			0		0		0		16:30			5		20		25	
04:45			0		0		0		16:45			9	24	12	60	21	84
05:00			1		0		1		17:00			4		3		7	
05:15			1		0		1		17:15			2		4		6	
05:30			2		0		2		17:30			7		6		13	
05:45			3	7	0		3	7	17:45			6	19	7	20	13	39
06:00			2		0		2		18:00			3		5		8	
06:15			3		0		3		18:15			1		10		11	
06:30			15		3		18		18:30			3		4		7	
06:45			14	34	2	5	16	39	18:45			1	8	1	20	2	28
07:00			6		3		9		19:00			1		3		4	
07:15			13		4		17		19:15			8		2		10	
07:30			5		3		8		19:30			5		3		8	
07:45			10	34	13	23	23	57	19:45			4	18	1	9	5	27
08:00			5		5		10		20:00			0		3		3	
08:15			10		6		16		20:15			3		4		7	
08:30			7		4		11		20:30			7		3		10	
08:45			3	25	6	21	9	46	20:45			3	13	0	10	3	23
09:00			5		1		6		21:00			1		1		2	
09:15			9		5		14		21:15			1		0		1	
09:30			2		3		5		21:30			2		2		4	
09:45			3	19	2	11	5	30	21:45			0	4	0	3	0	7
10:00			13		6		19		22:00			2		0		2	
10:15			6		9		15		22:15			0		0		0	
10:30			3		5		8		22:30			1		0		1	
10:45			2	24	3	23	5	47	22:45			2	5	0		2	5
11:00			5		11		16		23:00			1		0		1	
11:15			6		4		10		23:15			0		0		0	
11:30			8		7		15		23:30			1		0		1	
11:45			7	26	6	28	13	54	23:45			0	2	0		0	2
TOTALS				169		111		280	TOTALS				189		222		411
SPLIT %				60.4%		39.6%		40.5%	SPLIT %				46.0%		54.0%		59.5%

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	358	333	691

AM Peak Hour	06:30	11:30	05:30	PM Peak Hour	13:30	16:00	16:00
AM Pk Volume	48	29	60	PM Pk Volume	33	60	84
Pk Hr Factor	0.800	0.806	0.833	Pk Hr Factor	0.825	0.750	0.808
7 - 9 Volume	59	44	103	4 - 6 Volume	43	80	123
7 - 9 Peak Hour	07:00	07:45	07:45	4 - 6 Peak Hour	16:15	16:00	16:00
7 - 9 Pk Volume	34	28	60	4 - 6 Pk Volume	26	60	84
Pk Hr Factor	0.654	0.538	0.652	Pk Hr Factor	0.722	0.750	0.808

Prepared by NDS/ATD

VOLUME

Baseline Ave E/o SR-154

Day: Tuesday
Date: 3/13/2012

City: Santa Ynez
Project #: CA12_8021_002

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	755	802	1,557

AM Period	NB		SB		EB		WB		TOTAL		PM Period	NB		SB		EB		WB		TOTAL	
00:00					0		0		0		12:00					13		19		32	
00:15					0		0		0		12:15					13		10		23	
00:30					2		0		2		12:30					16		14		30	
00:45					0	2	0		0	2	12:45					17	59	12	55	29	114
01:00					0		0		0		13:00					17		14		31	
01:15					0		0		0		13:15					18		15		33	
01:30					0		0		0		13:30					8		8		16	
01:45					0		0		0		13:45					8	51	20	57	28	108
02:00					0		0		0		14:00					10		10		20	
02:15					0		0		0		14:15					8		17		25	
02:30					0		0		0		14:30					9		16		25	
02:45					0		0		0		14:45					8	35	17	60	25	95
03:00					0		0		0		15:00					11		21		32	
03:15					0		0		0		15:15					18		18		36	
03:30					0		0		0		15:30					12		16		28	
03:45					0		0		0		15:45					30	71	22	77	52	148
04:00					0		0		0		16:00					30		20		50	
04:15					0		0		0		16:15					15		24		39	
04:30					0		0		0		16:30					22		20		42	
04:45					0		1	1	1	1	16:45					9	76	14	78	23	154
05:00					2		1		3		17:00					15		23		38	
05:15					1		0		1		17:15					18		32		50	
05:30					3		2		5		17:30					13		5		18	
05:45					7	13	1	4	8	17	17:45					9	55	21	81	30	136
06:00					1		5		6		18:00					12		5		17	
06:15					10		3		13		18:15					3		5		8	
06:30					9		4		13		18:30					12		9		21	
06:45					16	36	8	20	24	56	18:45					4	31	7	26	11	57
07:00					11		7		18		19:00					5		16		21	
07:15					7		13		20		19:15					7		2		9	
07:30					7		10		17		19:30					5		4		9	
07:45					12	37	28	58	40	95	19:45					5	22	4	26	9	48
08:00					15		19		34		20:00					3		4		7	
08:15					8		13		21		20:15					6		1		7	
08:30					7		11		18		20:30					1		6		7	
08:45					9	39	11	54	20	93	20:45					4	14	1	12	5	26
09:00					21		10		31		21:00					2		0		2	
09:15					30		13		43		21:15					4		1		5	
09:30					12		13		25		21:30					3		0		3	
09:45					16	79	17	53	33	132	21:45					4	13	4	5	8	18
10:00					14		13		27		22:00					3		3		6	
10:15					15		25		40		22:15					1		0		1	
10:30					17		11		28		22:30					1		1		2	
10:45					17	63	18	67	35	130	22:45					2	7	1	5	3	12
11:00					10		15		25		23:00					1		1		2	
11:15					10		19		29		23:15					0		0		0	
11:30					15		7		22		23:30					1		0		1	
11:45					15	50	21	62	36	112	23:45					0	2	0	1	0	3
TOTALS						319		319		638	TOTALS						436		483		919
SPLIT %						50.0%		50.0%		41.0%	SPLIT %						47.4%		52.6%		59.0%

DAILY TOTALS	NB	SB	EB	WB	Total
	0	0	755	802	1,557

AM Peak Hour	09:00	07:45	09:00	PM Peak Hour	15:45	16:30	15:45
AM Pk Volume	79	71	132	PM Pk Volume	97	89	183
Pk Hr Factor	0.658	0.634	0.767	Pk Hr Factor	0.808	0.695	0.880
7 - 9 Volume	76	112	188	4 - 6 Volume	131	159	290
7 - 9 Peak Hour	07:30	07:45	07:45	4 - 6 Peak Hour	16:00	16:30	16:00
7 - 9 Pk Volume	42	71	113	4 - 6 Pk Volume	76	89	154
Pk Hr Factor	0.700	0.634	0.706	Pk Hr Factor	0.633	0.695	0.770

ITM Peak Hour Summary

Prepared by:

NDS

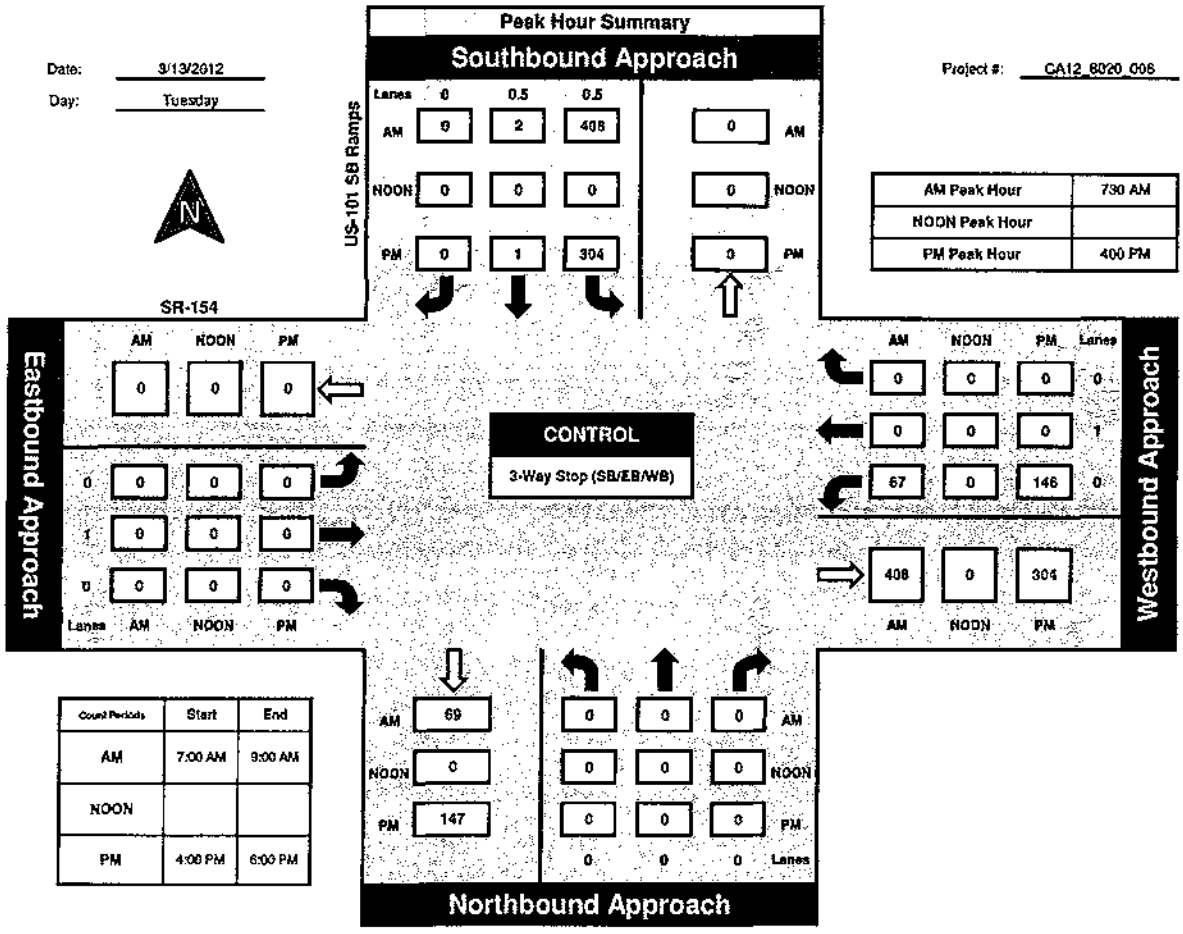
National Data & Surveying Services

US-101 SB Ramps and SR-154 , City of Los Olivos

Date: 3/13/2012

Day: Tuesday

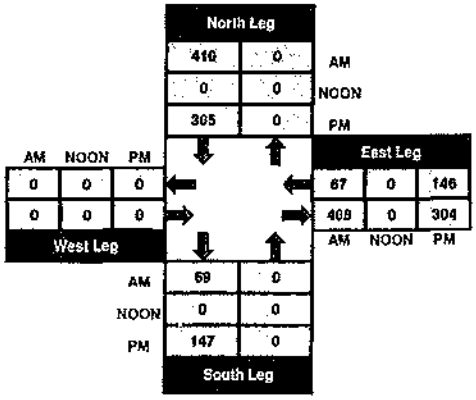
Project #: CA12_8020_006



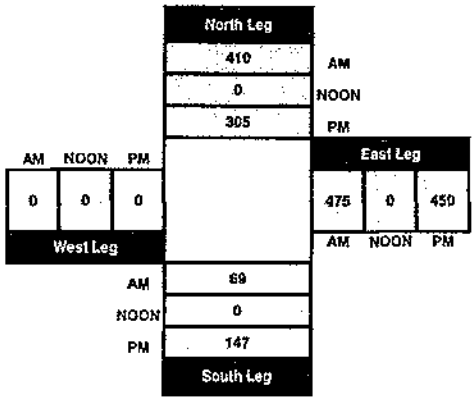
AM Peak Hour	730 AM
NOON Peak Hour	
PM Peak Hour	400 PM

Count Periods	Start	End
AM	7:00 AM	9:00 AM
NOON		
PM	4:00 PM	6:00 PM

Total Ins & Outs



Total Volume Per Leg



206

ITM Peak Hour Summary

Prepared by:

NDS

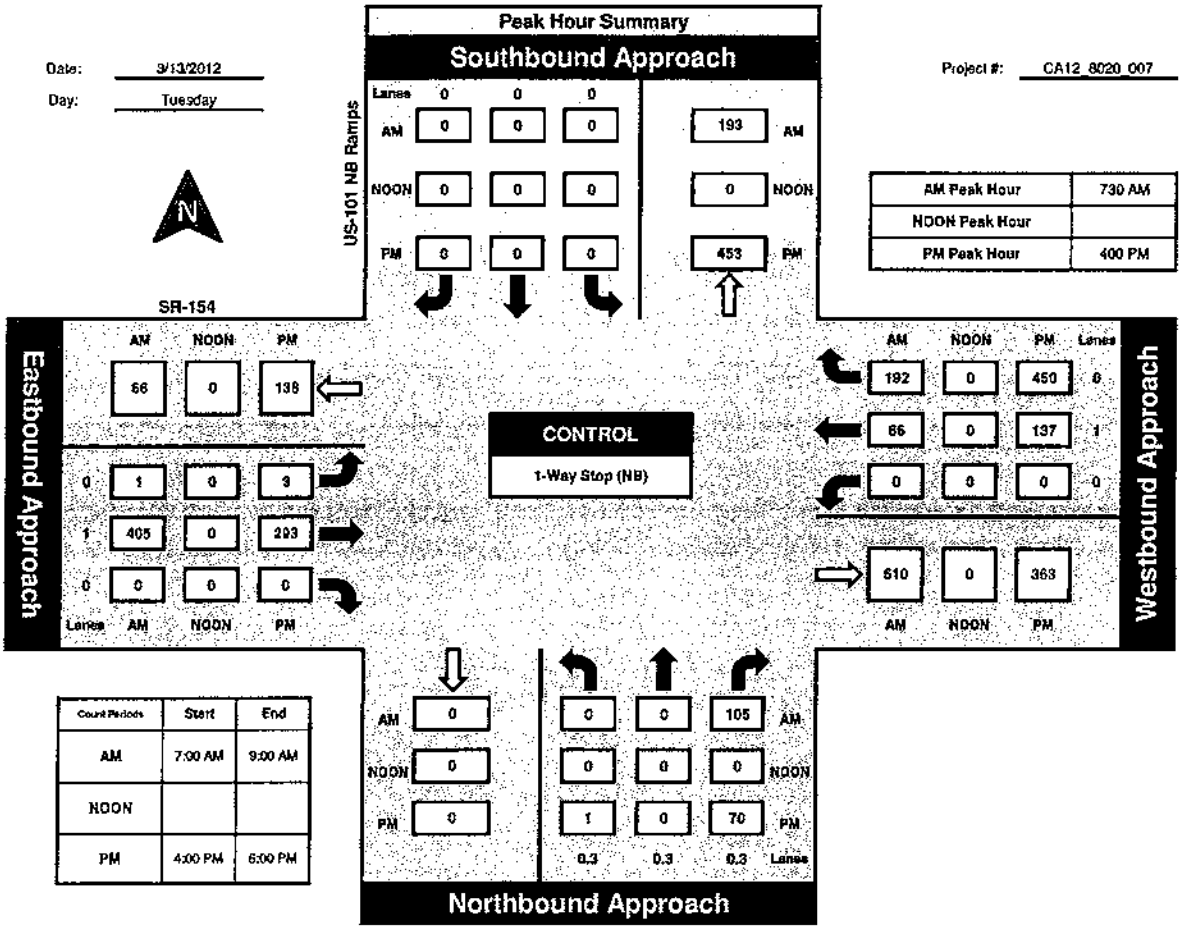
National Data & Surveying Services

US-101 NB Ramps and SR-154 , City of Los Olivos

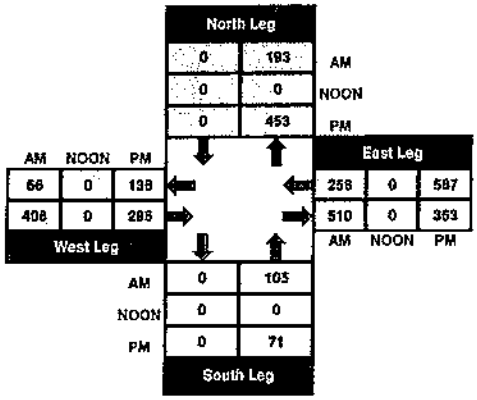
Date: 3/13/2012

Day: Tuesday

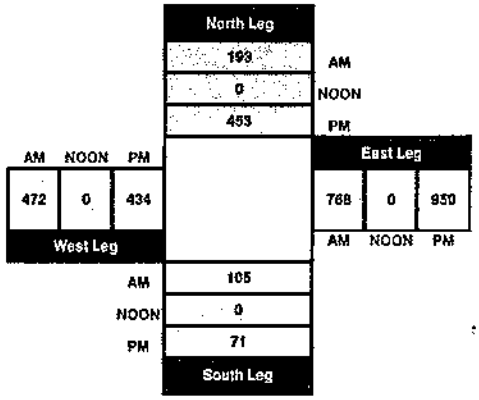
Project #: CA12_8020_007



Total Ins & Outs



Total Volume Per Leg

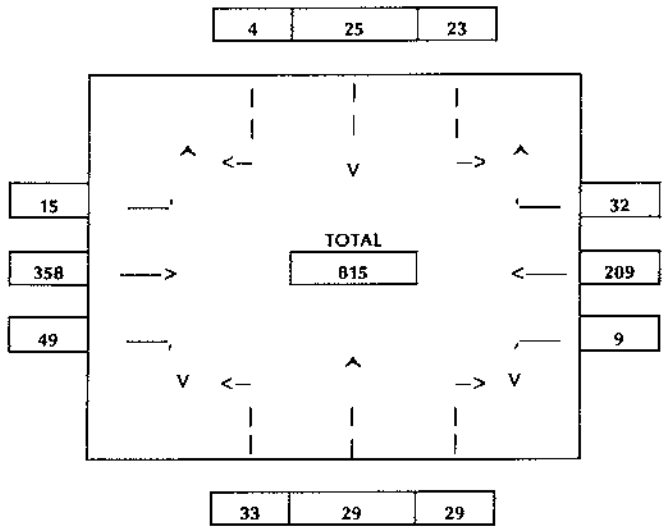


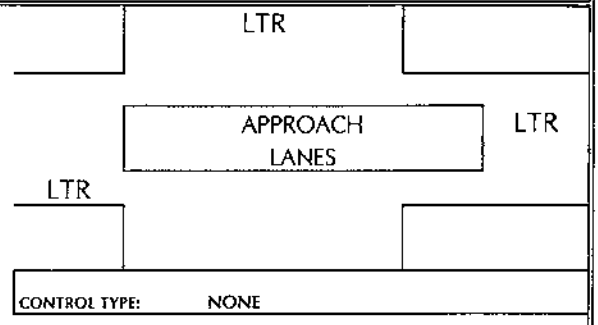
ASSOCIATED TRANSPORTATION ENGINEERS

INTERSECTION TURNING MOVEMENT SUMMARY

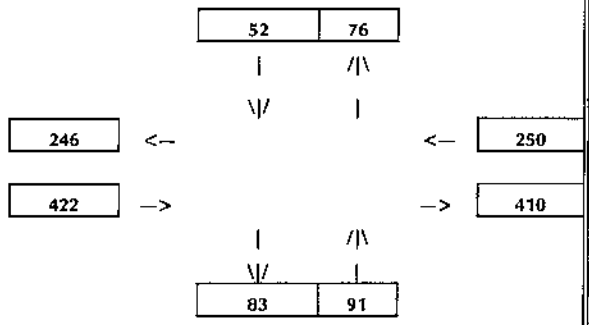
PROJECT: MATTEI'S TAVERN		PROJECT #: 07084	COUNT DATE: 03-15-11	FILE NAME:	02AM
N-S Approach:	GRAND AVE.		COUNT TIME: 04:00 P.M. TO 6:00		
E-W Approach:	SR 154		CITY: LOS OLIVOS	WEATHER:	CLEAR

PEAK HOUR: 08:00 AM TO 09:00 AM





ARRIVAL / DEPARTURE VOLUMES



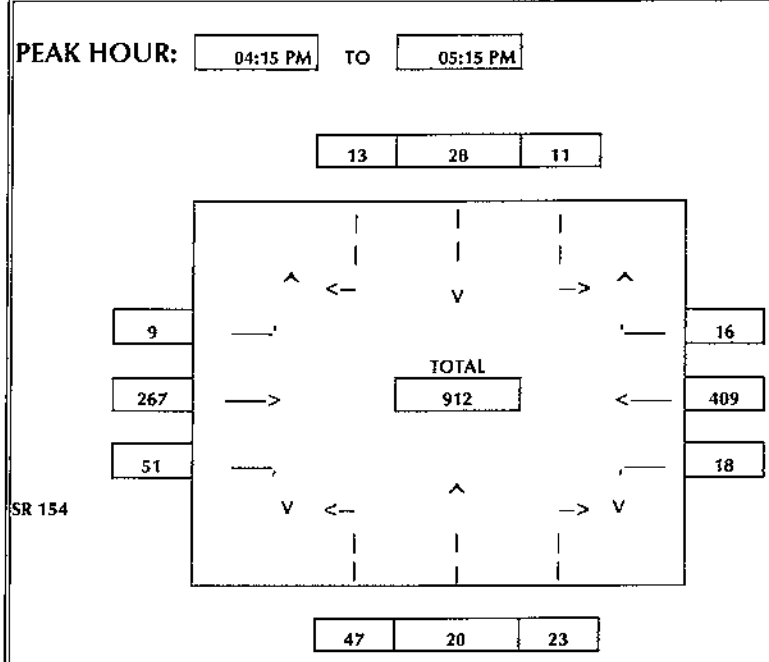
TIME PERIOD From	—	To	NORTHBOUND Left	Thru	Right	SOUTHBOUND Left	Thru	Right	EASTBOUND Left	Thru	Right	WESTBOUND Left	Thru	Right	TOTAL VOLUMES
COUNT DATA															
07:00 AM	—	07:15 AM	1	3	1	3	0	2	1	52	7	0	27	1	98
07:15 AM	—	07:30 AM	10	5	2	4	1	2	4	116	15	1	67	2	229
07:30 AM	—	07:45 AM	17	7	6	6	5	5	7	207	24	4	118	4	410
07:45 AM	—	08:00 AM	24	7	7	10	10	5	10	328	36	7	154	6	604
08:00 AM	—	08:15 AM	32	12	12	15	16	6	15	421	46	11	212	11	809
08:15 AM	—	08:30 AM	37	22	22	21	17	8	18	509	54	12	246	26	992
08:30 AM	—	08:45 AM	47	28	28	28	24	8	22	596	66	13	290	30	1180
08:45 AM	—	09:00 AM	57	36	36	33	35	9	25	686	85	16	363	38	1419
TOTAL BY PERIOD															
07:00 AM	—	07:15 AM	1	3	1	3	0	2	1	52	7	0	27	1	98
07:15 AM	—	07:30 AM	9	2	1	1	1	0	3	64	8	1	40	1	131
07:30 AM	—	07:45 AM	7	2	4	2	4	3	3	91	9	3	51	2	181
07:45 AM	—	08:00 AM	7	0	1	4	5	0	3	121	12	3	36	2	194
08:00 AM	—	08:15 AM	8	5	5	5	6	1	5	93	10	4	58	5	205
08:15 AM	—	08:30 AM	5	10	10	6	1	2	3	88	8	1	34	15	183
08:30 AM	—	08:45 AM	10	6	6	7	7	0	4	87	12	1	44	4	188
08:45 AM	—	09:00 AM	10	8	8	5	11	1	3	90	19	3	73	8	239
HOURLY TOTALS															
07:00 AM	—	08:00 AM	24	7	7	10	10	5	10	328	36	7	154	6	604
07:15 AM	—	08:15 AM	31	9	11	12	16	4	14	369	39	11	185	10	711
07:30 AM	—	08:30 AM	27	17	20	17	16	6	14	393	39	11	179	24	763
07:45 AM	—	08:45 AM	30	21	22	22	19	3	15	389	42	9	172	26	770
08:00 AM	—	09:00 AM	33	29	29	23	25	4	15	358	49	9	209	32	815

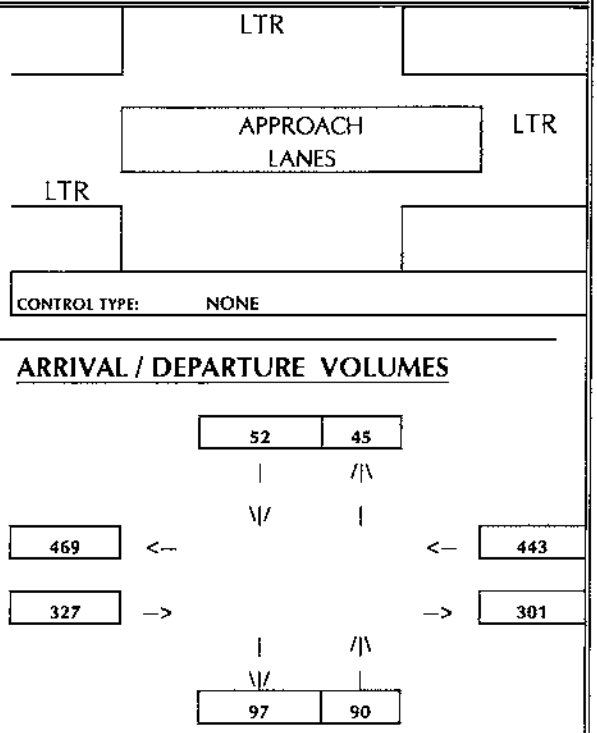
ASSOCIATED TRANSPORTATION ENGINEERS

INTERSECTION TURNING MOVEMENT SUMMARY

PROJECT: MATTEI'S TAVERN		PROJECT #: 07084	COUNT DATE: 03-10-11	FILE NAME:	02PM
N-S Approach:	GRAND AVE.		COUNT TIME: 04:00 P.M. TO 6:00		
E-W Approach:	SR 154		CITY: LOS OLIVOS	WEATHER:	SUNNY

PEAK HOUR: 04:15 PM TO 05:15 PM





TIME PERIOD From	—	To	NORTHBOUND Left	Thru	Right	SOUTHBOUND Left	Thru	Right	EASTBOUND Left	Thru	Right	WESTBOUND Left	Thru	Right	TOTAL VOLUMES
COUNT DATA															
04:00 PM	—	04:15 PM	9	3	5	4	4	0	2	72	11	2	108	5	225
04:15 PM	—	04:30 PM	23	7	8	5	9	3	2	130	27	8	221	10	453
04:30 PM	—	04:45 PM	35	15	23	9	16	5	7	194	40	12	327	12	695
04:45 PM	—	05:00 PM	43	21	24	11	20	7	9	274	50	15	410	16	900
05:00 PM	—	05:15 PM	56	23	28	15	32	13	11	339	62	20	517	21	1137
05:15 PM	—	05:30 PM	72	25	30	15	36	17	12	409	69	24	597	30	1336
05:30 PM	—	05:45 PM	87	30	38	17	38	17	15	492	78	30	694	33	1569
05:45 PM	—	06:00 PM	96	38	44	17	38	19	15	549	86	33	772	39	1746
TOTAL BY PERIOD															
04:00 PM	—	04:15 PM	9	3	5	4	4	0	2	72	11	2	108	5	225
04:15 PM	—	04:30 PM	14	4	3	1	5	3	0	58	16	6	113	5	228
04:30 PM	—	04:45 PM	12	8	15	4	7	2	5	64	13	4	106	2	242
04:45 PM	—	05:00 PM	8	6	1	2	4	2	2	80	10	3	83	4	205
05:00 PM	—	05:15 PM	13	2	4	4	12	6	2	65	12	5	107	5	237
05:15 PM	—	05:30 PM	16	2	2	0	4	4	1	70	7	4	80	9	199
05:30 PM	—	05:45 PM	15	5	8	2	2	0	3	83	9	6	97	3	233
05:45 PM	—	06:00 PM	9	8	6	0	0	2	0	57	8	3	78	6	177
HOURLY TOTALS															
04:00 PM	—	05:00 PM	43	21	24	11	20	7	9	274	50	15	410	16	900
04:15 PM	—	05:15 PM	47	20	23	11	28	13	9	267	51	18	409	16	912
04:30 PM	—	05:30 PM	49	18	22	10	27	14	10	279	42	16	376	20	883
04:45 PM	—	05:45 PM	52	15	15	8	22	12	8	298	38	18	367	21	874
05:00 PM	—	06:00 PM	53	17	20	6	18	12	6	275	36	18	362	23	846

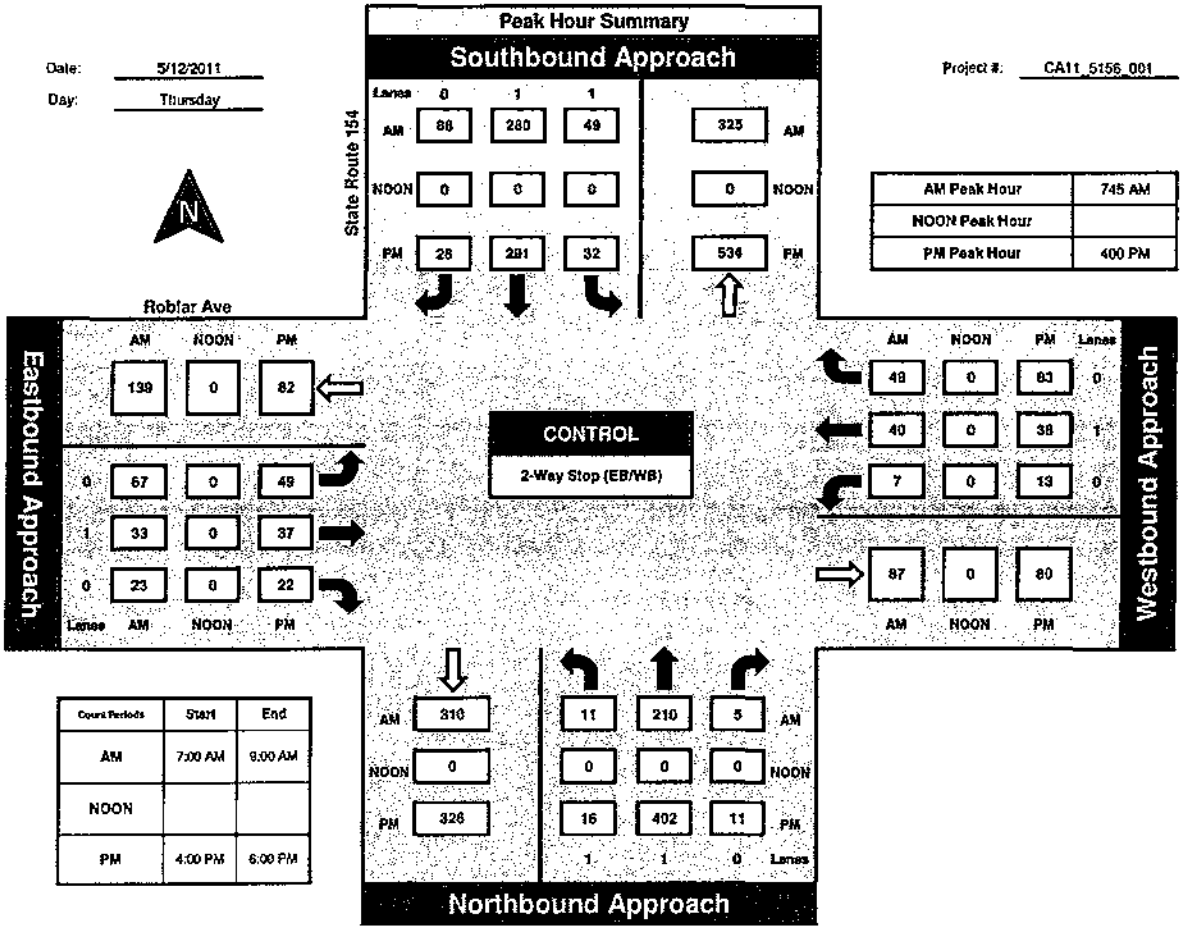
ITM Peak Hour Summary

Prepared by:

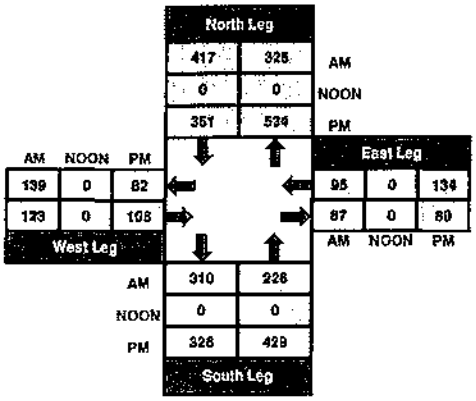
NDS

National Data & Surveying Services

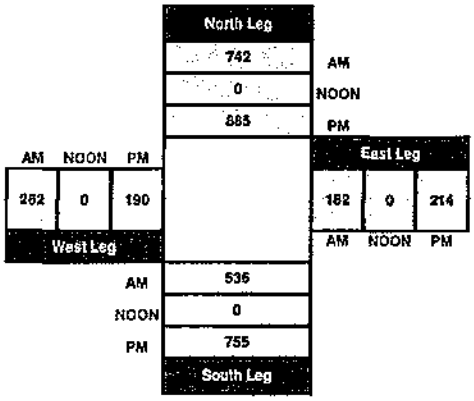
State Route 154 and Roblar Ave , City of Santa Ynez



Total Ins & Outs



Total Volume Per Leg



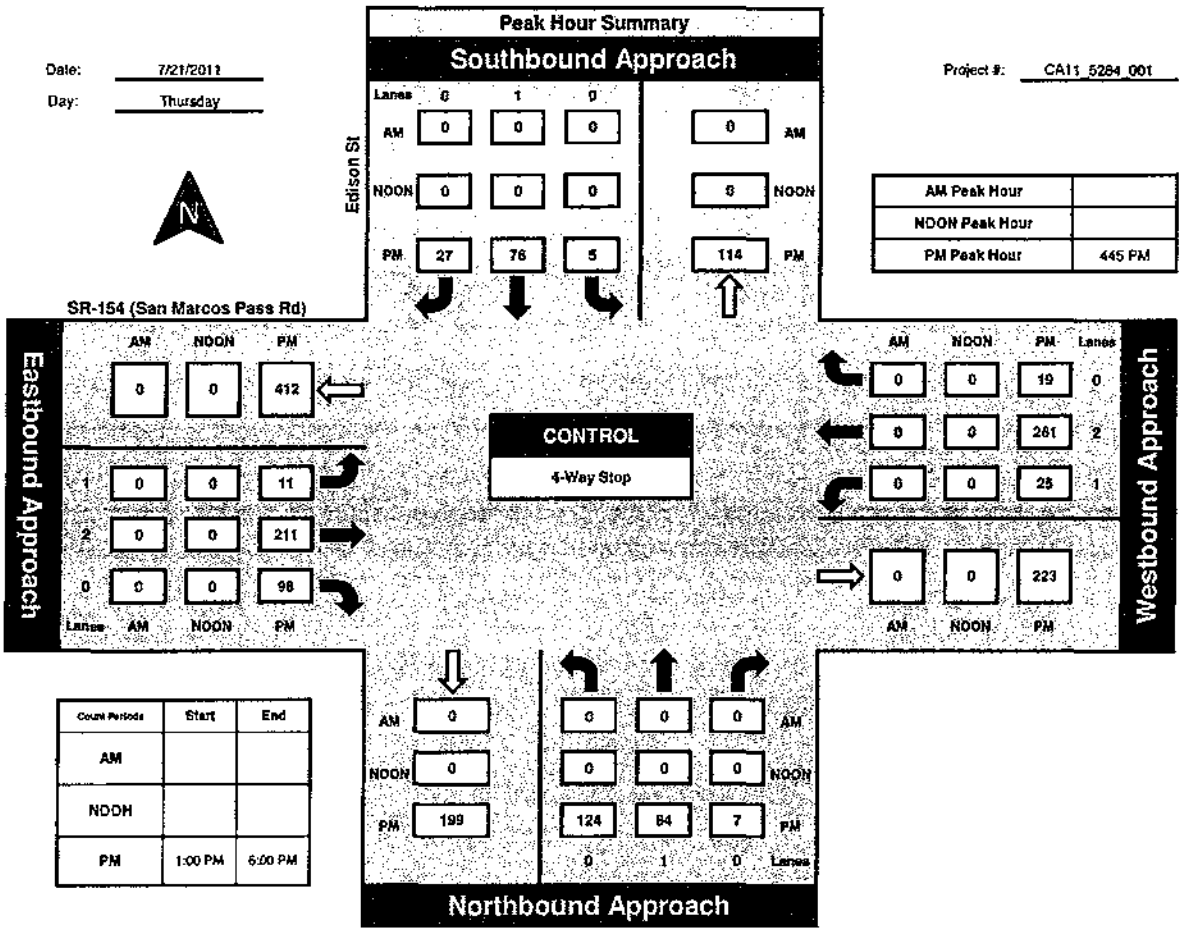
ITM Peak Hour Summary

Prepared by:
NDS
National Data & Surveying Services

Edison St and SR-154 (San Marcos Pass Rd) ,

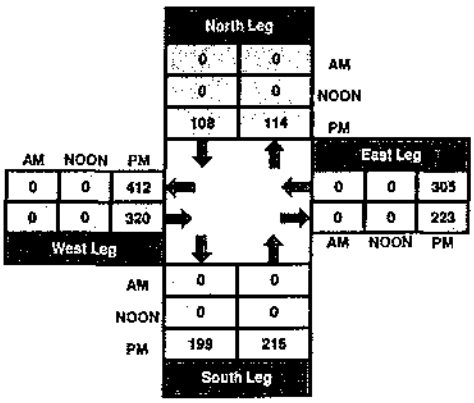
Date: 7/21/2011
Day: Thursday

Project #: CA11_5284_001

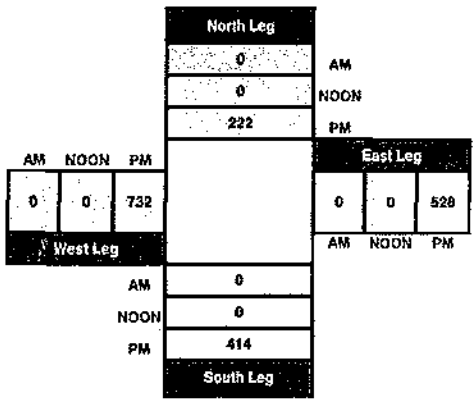


AM Peak Hour	
NOON Peak Hour	
PM Peak Hour	445 PM

Total Ins & Outs



Total Volume Per Leg



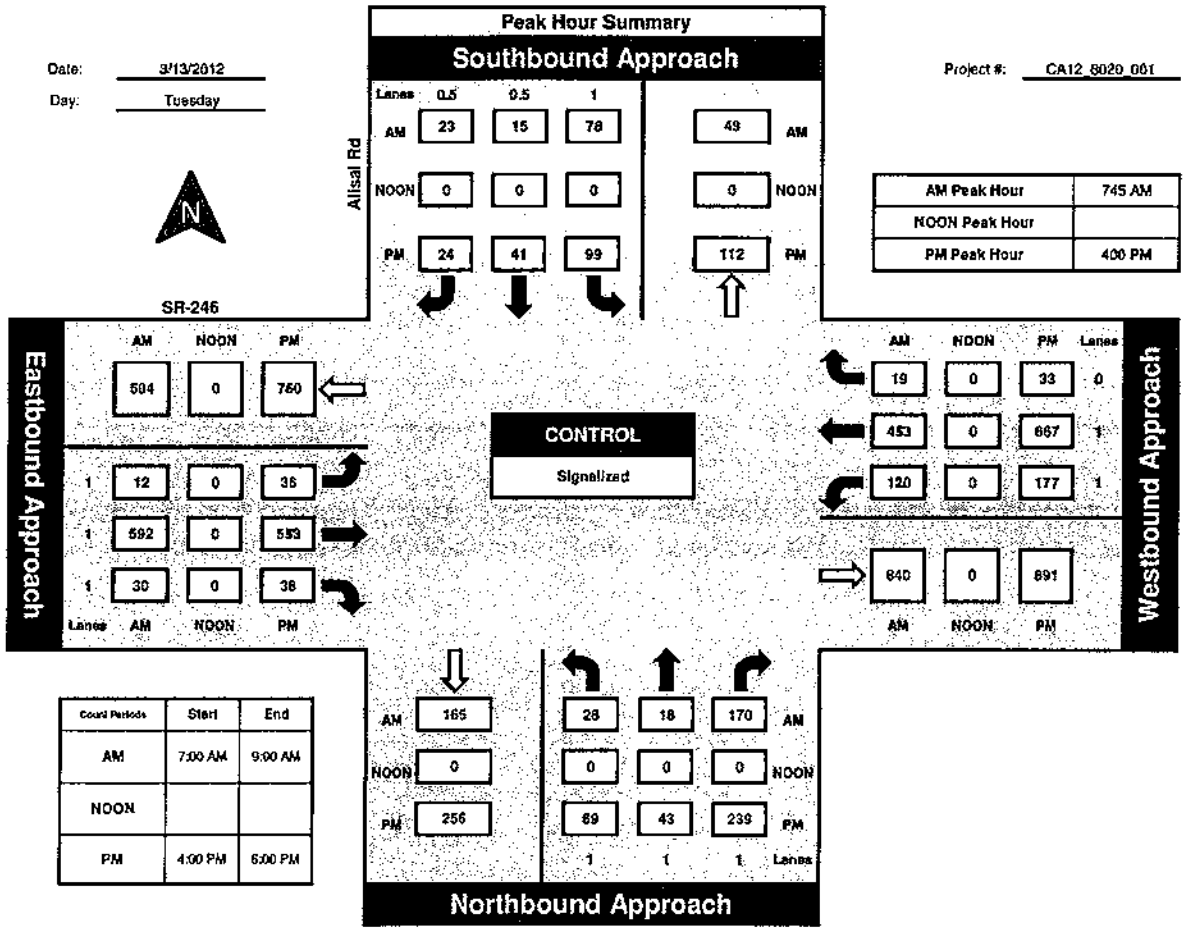
ITM Peak Hour Summary

Prepared by:

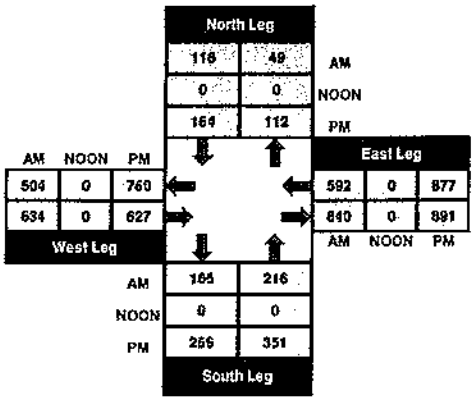
NDS

National Data & Surveying Services

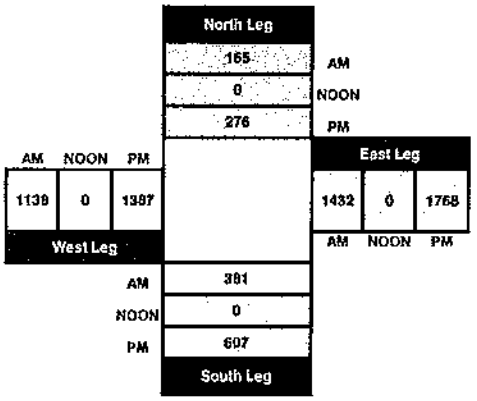
Alisal Rd and SR-246 , City of Solvang



Total Ins & Outs



Total Volume Per Leg



ITM Peak Hour Summary

Prepared by:

NDS

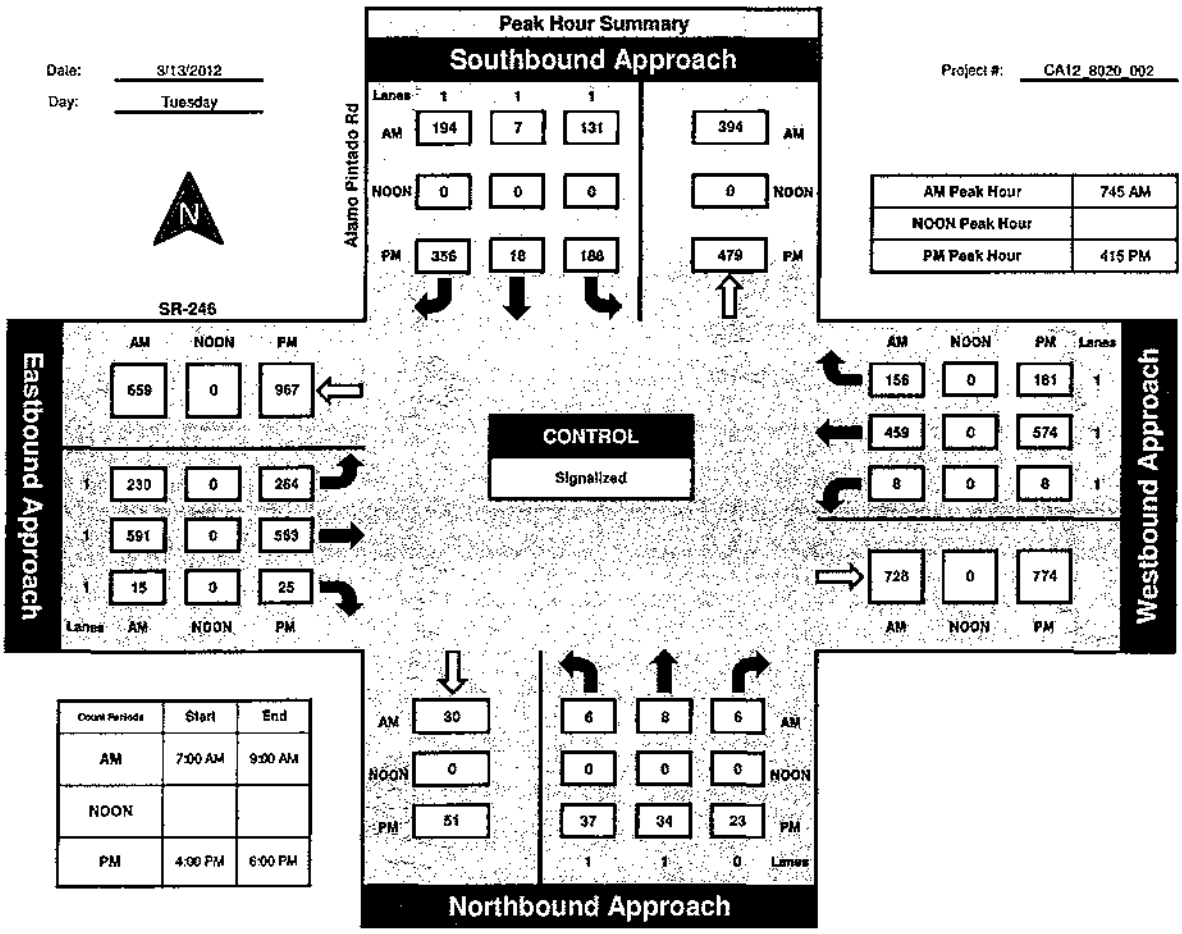
National Data & Surveying Services

Alamo Pintado Rd and SR-246 , City of Solvang

Date: 3/13/2012

Day: Tuesday

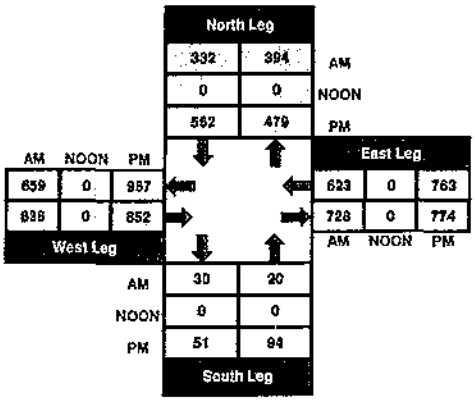
Project #: CA12_8020_002



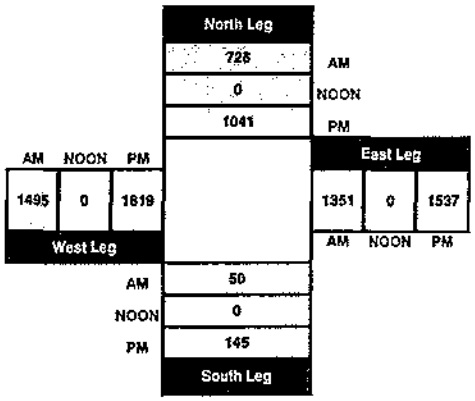
AM Peak Hour	745 AM
NOON Peak Hour	
PM Peak Hour	415 PM

Count Periods	Start	End
AM	7:00 AM	9:00 AM
NOON		
PM	4:00 PM	6:00 PM

Total Ins & Outs



Total Volume Per Leg



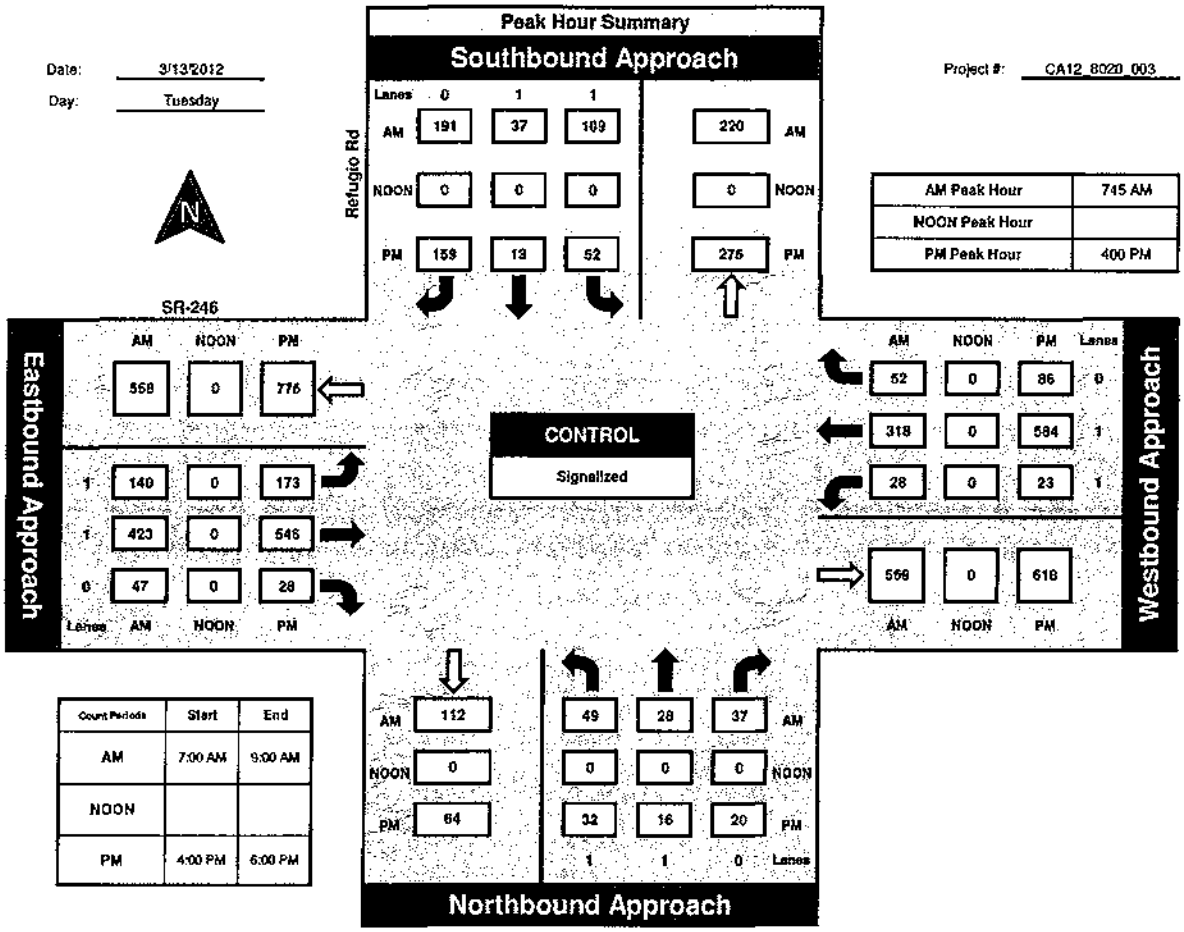
ITM Peak Hour Summary

Prepared by:

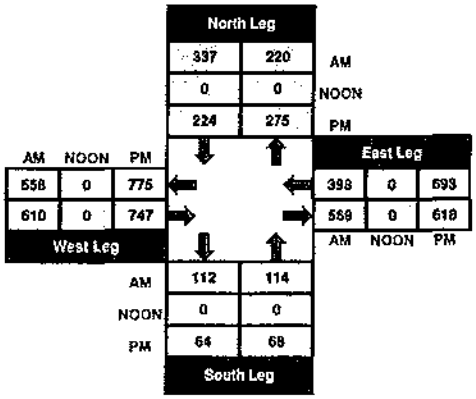
NDS

National Data & Surveying Services

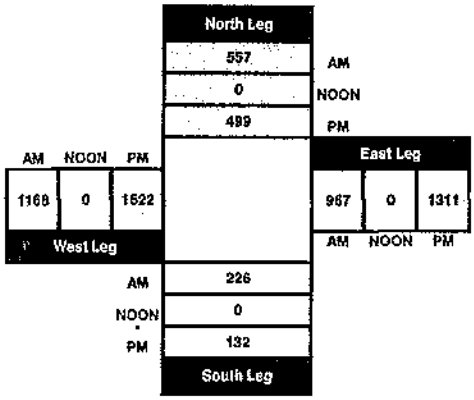
Refugio Rd and SR-246 , City of Solvang



Total Ins & Outs



Total Volume Per Leg



ITM Peak Hour Summary

Prepared by:

NDS

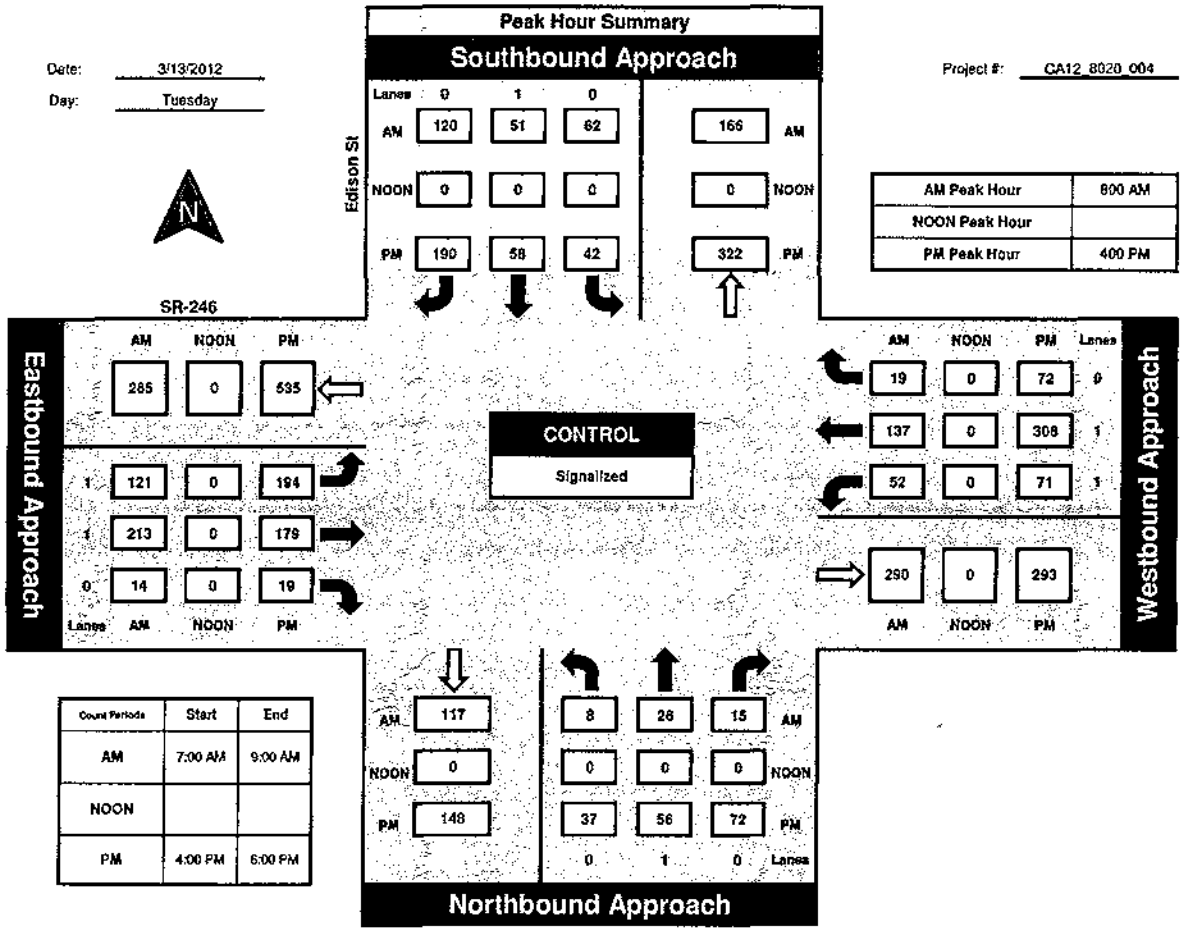
National Data & Surveying Services

Edison St and SR-246 , City of Santa Ynez

Date: 3/13/2012

Day: Tuesday

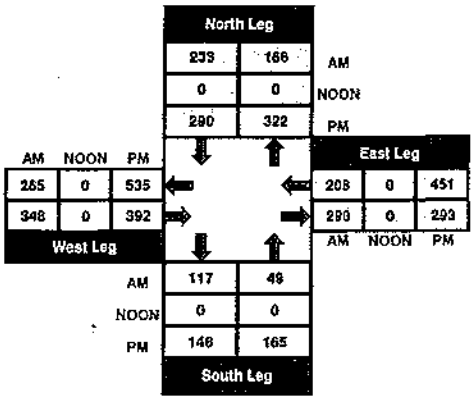
Project #: CA12_8020_004



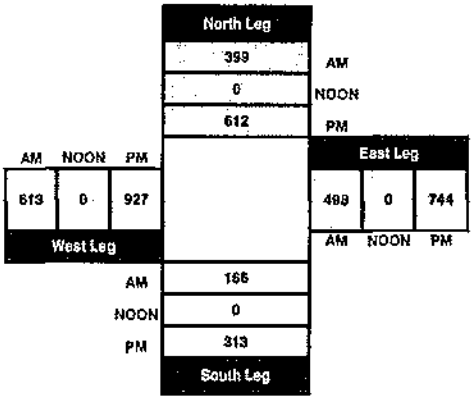
AM Peak Hour	800 AM
NOON Peak Hour	
PM Peak Hour	400 PM

Count Periods	Start	End
AM	7:00 AM	9:00 AM
NOON		
PM	4:00 PM	6:00 PM

Total Ins & Outs



Total Volume Per Leg



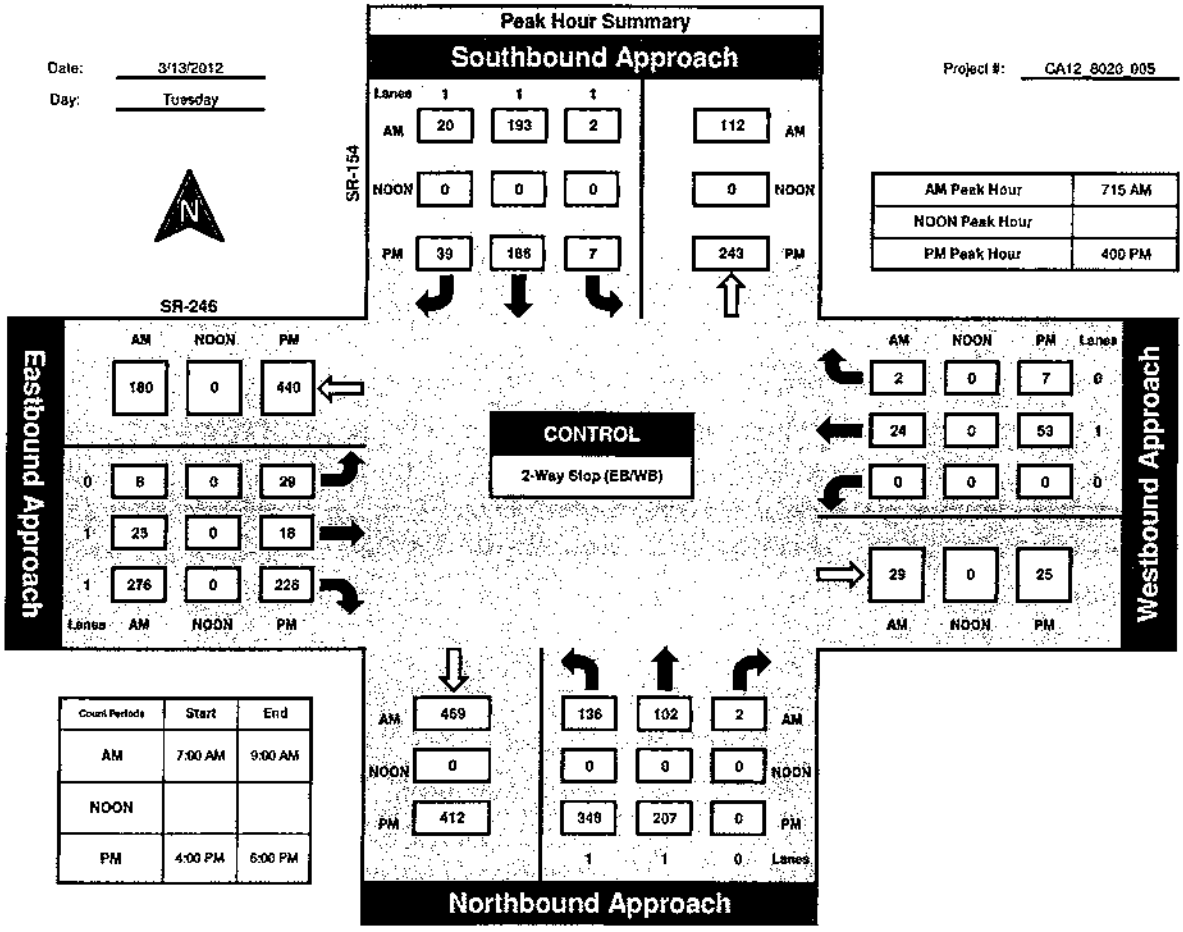
ITM Peak Hour Summary

Prepared by:

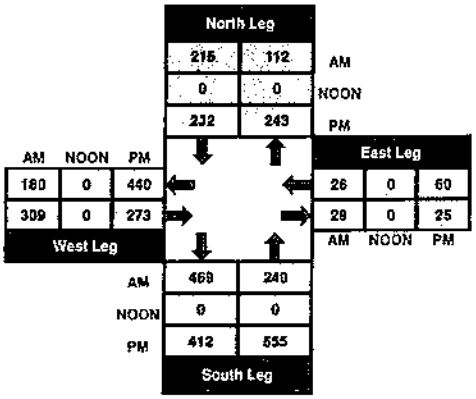
NDS

National Data & Surveying Services

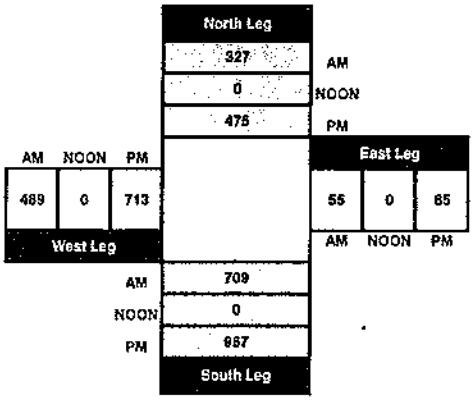
SR-154 and SR-246 , City of Santa Ynez



Total Ins & Outs



Total Volume Per Leg



APPENDIX M

TRIBAL CONSOLIDATION AND ACQUISITION PLAN (RESCINDED AND REMOVED)

In March 2013 the Tribe submitted the Tribal Consolidation and Acquisition Plan (Plan) and corresponding Tribal Consolidation Area (TCA) to the Bureau of Indian Affairs (BIA). On October 11, 2013, the Tribe withdrew without prejudice the approval Plan and corresponding TCA via Resolution #926 Santa Ynez Band of Chumash Indians-Tribal Land Consolidation Area (included as Appendix P of the Final EA). Accordingly, the Plan has been removed from the Final EA as it is no longer relevant to the Proposed Action.

APPENDIX O

COMMENTS AND RESPONSES TO COMMENTS ON AUGUST 2013 EA (NEW)

SANTA YNEZ BAND OF CHUMASH INDIANS CAMP 4 FEE-TO-TRUST

Comments and Responses to Comments on August 2013 Environmental Assessment

MAY 2014

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825-1846

SANTA YNEZ BAND OF CHUMASH INDIANS CAMP 4 FEE-TO-TRUST

Comments and Responses to Comments on August 2013 Environmental Assessment

MAY 2014

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825-1846

PREPARED BY:

Analytical Environmental Services
1801 7th Street, Suite 100
Sacramento, CA 95811
(916) 447-3479
www.analyticalcorp.com

CHAPTER 1.0
INTRODUCTION

1.1 OVERVIEW

The Environmental Assessment (EA) for the proposed Chumash Camp 4 Fee-to-Trust, dated August 2013 (SCH #2013081060) was submitted to the State Clearinghouse and released for public and agency review for a 30-day comment period beginning on August 20 and ending on September 19, 2013. An extension of the 30-day comment period was granted by the U.S. Bureau of Indian Affairs (BIA), ending the comment period on October 7, 2013. Due to a temporary closure of non-essential federal agency functions, the comment period was further extended until November 18, 2013. This document provides representative comments regarding the EA received during the comment period and responses to those comments.

1.2 ORGANIZATION OF THE DOCUMENT

Chapter 1.0 **Introduction**. This chapter provides information on the contents and organization of the Final EA.

Chapter 2.0 **Comments**. Chapter 2.0 includes a list of all commenters and representative copies of comment letters received on the EA. Representative comment letters are bracketed and annotated with individual comment numbers. Copies of duplicate letters and multiple copies of form letters have been excluded.

Chapter 3.0 **Responses to Comments.** Chapter 3.0 provides responses to the representative comment letters included in **Chapter 2.0**. Responses generally provide clarification of the original EA and occasionally include changes in, or additions to, the text of that document provided in the Final EA.

Chapter 4.0 **References**. A list of references for this document (exclusive of those included in the original EA) is provided in this chapter.

CHAPTER 2.0
COMMENTS ON AUGUST 2013 EA

Comments received on the August 2013 Environmental Assessment (EA) are listed in **Table 2-1**. Copies of representative comment letters are provided in their entirety on the following pages, and issues are individually bracketed and numbered in the margins of the representative comment letters. Copies of duplicate letters and multiple copies of form letters have been excluded from **Section 2.0**. Responses to the numbered comments are provided in **Chapter 3.0**.

TABLE 2-1
LIST OF COMMENTERS

Letter Number	Agency/Organization	Name	Date Received
Federal Agencies (F)			
No comment letters received from federal agencies.			
State Agencies (S)			
S1	California Department of Transportation, District 5	Adam Fukushima, PTP	20-Sep-13
S2	California Department of Fish and Wildlife, South Coast Region	Martin Potter, Senior Environmental Scientist	20-Sep-13
S3	State Clearinghouse	Scott Morgan	20-Sep-13
S4	California Department of Fish and Wildlife, South Coast Region	Edmund Pert, Regional Manager	22-Oct-13
S5	Native American Heritage Commission	Dave Singleton	23-Aug-13
S6	Native American Heritage Commission	Dave Singleton	30-Aug-13
S7	State Clearinghouse	Scott Morgan	5-Nov-13
S8	State Clearinghouse	Scott Morgan	21-Nov-13
Local Agencies (L)			
L1	Santa Barbara County	Chandra Wallar, County Executive Officer	27-Aug-13
L2	Santa Barbara County	Cathy Christian, Attorney	9-Sep-13
L3	Santa Barbara County	Cam Van Wingerden on behalf of Chandra L Wallar, County Executive Officer	21-Oct-13
L4	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad and Diane C. De Felice, Attorneys	21-Oct-13
L5	Santa Barbara County	Cam Van Wingerden on behalf of Chandra L Wallar, County Executive Officer	21-Oct-13
L6	Santa Barbara County	Cam Van Wingerden on behalf of Chandra L Wallar, County Executive Officer	21-Oct-13
L7	Santa Ynez River Water Conservation District, Improvement District No. 1	Ryan A. Smith, Attorney	22-Oct-13
L8	Santa Barbara County	Chandra Wallar, County Executive Officer	31-Oct-13
L9	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad and Ryan A. Smith, Attorneys	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
L10	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad and Ryan A. Smith, Attorneys	22-Oct-13
L11	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad and Ryan A. Smith, Attorneys	22-Oct-13
L12	City of Solvang	Jim Richardson, Mayor	22-Oct-13
L13	Santa Barbara County	Chandra Wallar, County Executive Officer	22-Oct-13
L14	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad and Diane C. De Felice, Attorneys	22-Oct-13
L15	Santa Barbara County	Chandra Wallar, County Executive Officer	22-Oct-13
L16	Santa Barbara County	Chandra Wallar, County Executive Officer	12-Nov-13
L17	Santa Ynez River Water Conservation District, Improvement District No. 1	Ryan A. Smith, Attorney	4-Nov-13
L18	Santa Ynez River Water Conservation District, Improvement District No. 1	Gary M. Kvistad, Attorney	11-Nov-13
L19	Santa Ynez River Water Conservation District, Improvement District No. 1	Ryan A. Smith, Attorney	4-Nov-13
Private Entities/ Organizations (P)			
P1	Stand Up for California	Cheryl Schmit, Director	27-Aug-13
P2	Private Citizen	Jonathan Paulson	27-Aug-13
P3	Private Citizen	Mike Hennigan	27-Aug-13
P4	Private Citizen	Edward Zaske	27-Aug-13
P5	Private Citizen	Josiah Jenkins	27-Aug-13
P6	Echo Angels	Karen Palmer, Founder and CEO	27-Aug-13
P7	Private Citizen	Robert M. Sinclair	27-Aug-13
P8	Private Citizen	Pamela Zwehl-Burke	27-Aug-13
P9	Private Citizen	Robert M. Sinclair	27-Aug-13
P10	Private Citizen	Judith M. Stauffer	27-Aug-13
P11	Private Citizen	Nancy Englander	27-Aug-13
P12	Private Citizen	Lori Parker	27-Aug-13
P13	Private Citizen	Judd Conley	28-Aug-13
P14	Private Citizen	Beth and E.A. Horvath	28-Aug-13
P15	Private Citizen	Merilee Conley	28-Aug-13
P16	Private Citizen	Karry Rossetti	28-Aug-13
P17	Private Citizen	Chuck and Irene Cunningham	28-Aug-13
P18	Private Citizen	Michael A. Dunn	28-Aug-13
P19	Private Citizen	Mike Shuler	28-Aug-13
P20	Private Citizen	John Soles	28-Aug-13
P21	Private Citizen	Robin L. Deshayes	28-Aug-13
P22	Private Citizen	Sandra Focht	28-Aug-13
P23	Private Citizen	Tim Gorham	28-Aug-13
P24	Private Citizen	Bill Krauch	28-Aug-13
P25	Private Citizen	Kyle Abello	28-Aug-13
P26	Private Citizen	Caryn Cantella	28-Aug-13

Letter Number	Agency/Organization	Name	Date Received
P27	Private Citizen	Mary Conway	28-Aug-13
P28	Private Citizen	Neal Abello	28-Aug-13
P29	Private Citizen	Virginia Burroughs	28-Aug-13
P30	Private Citizen	Michelle de Werd	28-Aug-13
P31	Private Citizen	Linda and Sid Kastner	28-Aug-13
P32	Private Citizen	Mary Jane Edalatpour	28-Aug-13
P33	Private Citizen	Robert P. and Ann Tucker	28-Aug-13
P34	Private Citizen	Mary Jane West-Delgado	28-Aug-13
P35	Prince Lionheart, Inc.	Kelly McConnell, CEO	28-Aug-13
P36	Private Citizen	Greg Brous, CEO	28-Aug-13
P37	Private Citizen	Susie Nelson	28-Aug-13
P38	Private Citizen	Robert Walton	28-Aug-13
P39	Private Citizen	Jane Overbaugh	28-Aug-13
P40	Private Citizen	Bill Grove	28-Aug-13
P41	Private Citizen	Jordan Mo and Janet I. Hines	28-Aug-13
P42	Private Citizen	Susie Snow, Pat Wall and Jean Wall	28-Aug-13
P43	Private Citizen	Kenneth Karas	28-Aug-13
P44	Private Citizen	Ann Janis	28-Aug-13
P45	Private Citizen	Kelly and Sandy Rose	28-Aug-13
P46	Private Citizen	Lynn North	28-Aug-13
P47	Private Citizen	Wendy L. Eisler	28-Aug-13
P48	Private Citizen	Harold McHugh	28-Aug-13
P49	Private Citizen	Gary Waples	28-Aug-13
P50	Private Citizen	Heather Elliott	28-Aug-13
P51	Private Citizen	Jon Quirt	29-Aug-13
P52	Private Citizen	Tami and Denison Bollay	29-Aug-13
P53	Private Citizen	George Newbern	29-Aug-13
P54	Private Citizen	Jeanette and Gary Skippon	29-Aug-13
P55	Private Citizen	Heide Moir	29-Aug-13
P56	Private Citizen	Michael H. Focht, Sr.	29-Aug-13
P57	Private Citizen	Kelly, Michael, Travis, and Molly McGill	29-Aug-13
P58	Private Citizen	Patricia Donato	29-Aug-13
P59	Private Citizen	Mary Bahnken	29-Aug-13
P60	Grand Meadows Nutritional Supplements	Angela Slater	29-Aug-13
P61	Private Citizen	Scott and Claudia Matthews	29-Aug-13
P62	Private Citizen	Steve and Bonnie Bollinger	29-Aug-13
P63	Private Citizen	Jeff Nelson	29-Aug-13
P64	Private Citizen	Paula Hunsicker	29-Aug-13
P65	Private Citizen	Irene P. Cunningham	29-Aug-13
P66	Private Citizen	Barbara Woronovich	29-Aug-13

Letter Number	Agency/Organization	Name	Date Received
P67	Private Citizen	Joni O'Holland and David Zatz	29-Aug-13
P68	Private Citizen	Mark C. Rick	29-Aug-13
P69	Vista Verde Ranch	Carol Ann Herrera	29-Aug-13
P70	Private Citizen	Lee and George Weir	29-Aug-13
P71	Private Citizen	Steve Raftopoulos	29-Aug-13
P72	Private Citizen	Patrick and Lucy McCarthy	29-Aug-13
P73	Private Citizen	John H. Werden	29-Aug-13
P74	Private Citizen	Nancy and David Hunsicker	29-Aug-13
P75	Private Citizen	Michele Hinnrichs	29-Aug-13
P76	Private Citizen	Shirley DiCroce	29-Aug-13
P77	Private Citizen	Gerry B. Shepherd	29-Aug-13
P78	Private Citizen	Susan Nelson	29-Aug-13
P79	Private Citizen	Shayna Rockwell	29-Aug-13
P80	Private Citizen	Jeanne Hollingsworth	29-Aug-13
P81	Santa Ynez Vacation Rentals	Leanne M. Schlinger	30-Aug-13
P82	Private Citizen	Carol Houchens	30-Aug-13
P83	Private Citizen	Erik Gregersen	30-Aug-13
P84	Private Citizen	Shelia Benedict	30-Aug-13
P85	Private Citizen	Klaus and Lois Brown	30-Aug-13
P86	Private Citizen	Julie Ferguson	30-Aug-13
P87	Village Properties Realtors	Carey Kendall	30-Aug-13
P88	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	30-Aug-13
P89	Private Citizen	Susie Snow	30-Aug-13
P90	Private Citizen	Maria Costa	30-Aug-13
P91	Private Citizen	Joe Sanguine	30-Aug-13
P92	Private Citizen	Kelsey Waples	30-Aug-13
P93	Private Citizen	Dennis Schoen	30-Aug-13
P94	Private Citizen	Gary Chamess	30-Aug-13
P95	Private Citizen	Linda Fiorentine	30-Aug-13
P96	Private Citizen	Alice Olla	30-Aug-13
P97	Private Citizen	Kathleen L. Ealand	30-Aug-13
P98	Private Citizen	Rich Nagler	30-Aug-13
P99	Private Citizen	Susan M. Brooks	30-Aug-13
P100	Private Citizen	Cherie Rivas	30-Aug-13
P101	Private Citizen	Brad Ross	30-Aug-13
P102	Private Citizen	Louis Friedman	30-Aug-13
P103	Private Citizen	Susan Vasek	31-Aug-13
P104	Properties Plus	Ken Sideris, Broker	31-Aug-13
P105	Private Citizen	Lida Sideris	31-Aug-13
P106	Private Citizen	Denison Bollay	31-Aug-13

Letter Number	Agency/Organization	Name	Date Received
P107	Private Citizen	Andrew Pierog	31-Aug-13
P108	Private Citizen	Dominique Lacerte	31-Aug-13
P109	Private Citizen	Steve Wood	31-Aug-13
P110	16 Crows Ranch	Diane Petras	31-Aug-13
P111	Private Citizen	Virginia Cooper	31-Aug-13
P112	Private Citizen	Stanley S. Freedman	31-Aug-13
P113	Private Citizen	Stanley S. Freedman	31-Aug-13
P114	Private Citizen	Dr. Virgil Elings	31-Aug-13
P115	Private Citizen	Marguerite LePley	31-Aug-13
P116	Private Citizen	Mary Lloyd Mills	31-Aug-13
P117	Private Citizen	Natalie Kaplan	31-Aug-13
P118	Private Citizen	Patricia P. Murphy	31-Aug-13
P119	Private Citizen	Mary Ann Sampson	31-Aug-13
P120	Private Citizen	Karin Roser	31-Aug-13
P121	Private Citizen	David and Nancy Wyatt	31-Aug-13
P122	Private Citizen	Kendall Mills	31-Aug-13
P123	Private Citizen	Lynn Parker Sinclair	31-Aug-13
P124	Seven Oaks Ranch	Brooke Matthews	31-Aug-13
P125	Private Citizen	Bruce Mocettini	31-Aug-13
P126	Private Citizen	Dr. James and Nadine Riley	31-Aug-13
P127	Private Citizen	Donna Sheldon	31-Aug-13
P128	Private Citizen	Teri Harmon	1-Sep-13
P129	Private Citizen	Jeanne Holligsworth	1-Sep-13
P130	Private Citizen	Art Lacerte	1-Sep-13
P131	Private Citizen	Fredric Steck	1-Sep-13
P132	Private Citizen	Carol P. Johnson	1-Sep-13
P133	Private Citizen	Kathleen Galbraith	1-Sep-13
P134	Private Citizen	Mrs. Kay Alves	1-Sep-13
P135	Private Citizen	Sybil K. Cline	1-Sep-13
P136	Private Citizen	Eric Durst	1-Sep-13
P137	Private Citizen	Ethel Larrabee	2-Sep-13
P138	Private Citizen	Sonja and Larry Popkin	2-Sep-13
P139	Private Citizen	Greg LeRoy	2-Sep-13
P140	Private Citizen	Joan M. Scanlon	2-Sep-13
P141	Private Citizen	Jennelle St. Marie	2-Sep-13
P142	Private Citizen	Jack Bohnet	2-Sep-13
P143	Private Citizen	Walden Bohnet	2-Sep-13
P144	Private Citizen	Michael Loman	2-Sep-13
P145	Private Citizen	Amy Hermann	2-Sep-13
P146	Private Citizen	Gerald Schroeder	2-Sep-13

Letter Number	Agency/Organization	Name	Date Received
P147	Private Citizen	Kathleen Heringer	2-Sep-13
P148	Private Citizen	William Heringer, MD	2-Sep-13
P149	Private Citizen	Allen M. Segal	3-Sep-13
P150	Private Citizen	Christine and Dennis Beebe	3-Sep-13
P151	Village Properties Realtors	Patti Cotter, Broker Associate	3-Sep-13
P152	Private Citizen	Lindalee Baumgarten	3-Sep-13
P153	CNC Machining, Inc.	Greg Brous, CEO	3-Sep-13
P154	Private Citizen	Wendy Wegeles	3-Sep-13
P155	Private Citizen	Don Sheldon	3-Sep-13
P156	Private Citizen	Belinda Hart	3-Sep-13
P157	Private Citizen	Kerry Perez	3-Sep-13
P158	Culbertson, Adams and Associates, Inc.	Andriette Culbertson	3-Sep-13
P159	Private Citizen	Ann Young	3-Sep-13
P160	Private Citizen	Peter Van Iderstine	3-Sep-13
P161	Private Citizen	Kelli Pappas	3-Sep-13
P162	Private Citizen	John H. Harmon	3-Sep-13
P163	Red Blossom Farms	D.B.	4-Sep-13
P164	Private Citizen	Linda and Sid Kastner	2-Sep-13
P165	Private Citizen	William L. Jackson	3-Sep-13
P166	Private Citizen	Wendall B. Shepherd	3-Sep-13
P167	Private Citizen	R. Busby	3-Sep-13
P168	Private Citizen	Donna and Patrick Will	3-Sep-13
P169	Private Citizen	Christine Beebe	3-Sep-13
P170	Private Citizen	James Victor	2-Sep-13
P171	Private Citizen	Melinda Jensen	9-Sep-13
P172	Private Citizen	D. and M. R.	6-Sep-13
P173	Private Citizen	A.M.	9-Sep-13
P174	Private Citizen	Mrs. John Borales	9-Sep-13
P175	Private Citizen	Kelly B. Gray	9-Sep-13
P176	Board of Directors Neighborhood Defense League	Judith Ishkanian, President	4-Sep-13
P177	Private Citizen	David M. Norcott	4-Sep-13
P178	Private Citizen	Fred Kovol	4-Sep-13
P179	Private Citizen	Chuck and Laura Evans	4-Sep-13
P180	Private Citizen	Gregory A Schipper	5-Sep-13
P181	Private Citizen	Elizabeth Knowlton	5-Sep-13
P182	Private Citizen	Jim Kelley	5-Sep-13
P183	Private Citizen	Thoma Martinov	5-Sep-13
P184	Private Citizen	Brett Elingber	5-Sep-13
P185	Private Citizen	Karen Roberts	5-Sep-13

Letter Number	Agency/Organization	Name	Date Received
P186	Private Citizen	Mr. and Mrs. Manniche	5-Sep-13
P187	Private Citizen	Michael Nuanes	5-Sep-13
P188	Private Citizen	Dr. Jim Gilbert	5-Sep-13
P189	Private Citizen	Sheridan Force	5-Sep-13
P190	Private Citizen	William J. Otto, DVM	5-Sep-13
P191	Private Citizen	Gerald Rounds	5-Sep-13
P192	Private Citizen	Kelly and Sandy Rose	6-Sep-13
P193	Private Citizen	Denise C. Schipper	6-Sep-13
P194	San Lucas Ranch	Anne V. Crawford-Hall	6-Sep-13
P195	Private Citizen	John Harmon	7-Sep-13
P196	Private Citizen	Evan	7-Sep-13
P197	Private Citizen	Jerry and Claire Shoemaker	9-Sep-13
P198	Private Citizen	Mary Dascomb	9-Sep-13
P199	Private Citizen	Edward and Suzanne Brehony	9-Sep-13
P200	Private Citizen	Mr. and Mrs. R.G. Shawcroft, Sr.	9-Sep-13
P201	Private Citizen	Carlyle Eubank	9-Sep-13
P202	Private Citizen	Paul and Valorie Hodgert	9-Sep-13
P203	Private Citizen	Marsha White and Eric Durst	9-Sep-13
P204	Private Citizen	Ellen A Hall	9-Sep-13
P205	Private Citizen	Daniel R. Hall	9-Sep-13
P206	Santa Ynez Rancho Estates Mutual Water Company, Inc. Board of Directors	Robert B. Field, President	3-Sep-13
P207	Private Citizen	Kelly Gray	11-Sep-13
P208	Private Citizen	Jane Quigley	12-Sep-13
P209	Private Citizen	Edward Quigley	12-Sep-13
P210	Private Citizen	D.B.	12-Sep-13
P211	Private Citizen	Nelson E. Owens	12-Sep-13
P212	Private Citizen	Stephen and Susan Lisenby	12-Sep-13
P213	Private Citizen	Bruce, Sandra, Brant Messer	12-Sep-13
P214	Private Citizen	Gary and Anna Nett	12-Sep-13
P215	Private Citizen	A. Ransom	12-Sep-13
P216	Private Citizen	J.J. and Eloise Jane Weston	12-Sep-13
P217	Private Citizen	Sandra Jordan	12-Sep-13
P218	Private Citizen	Louise Erb	12-Sep-13
P219	Private Citizen	Penny and Ian Bernard	12-Sep-13
P220	Private Citizen	Ronald Erb	12-Sep-13
P221	Private Citizen	Kathleen Erb	12-Sep-13
P222	Private Citizen	A. and Charlotte Ferregey	12-Sep-13
P223	Private Citizen	Tom Greene	12-Sep-13
P224	Private Citizen	Betty Joyce McIntosh	12-Sep-13

Letter Number	Agency/Organization	Name	Date Received
P225	Private Citizen	Linda and Jack Gordon	12-Sep-13
P226	Private Citizen	John and Joan Swift	12-Sep-13
P227	Private Citizen	E.E.	20-Sep-13
P228	Private Citizen	Suzanne and Brian Kramer	20-Sep-13
P229	Private Citizen	Ingerid J. Ekeland	20-Sep-13
P230	Private Citizen	Gregory C. Paraskou and Marianne Minor	20-Sep-13
P231	Private Citizen	Mrs. Aury Todd	12-Sep-13
P232	Private Citizen	Karen C. Martes	12-Sep-13
P233	Law Offices Zeutzius & LaBran	William Zeutzius, Jr.	20-Sep-13
P234	Private Citizen	Gary M. and Judith A. Cory	20-Sep-13
P235	Private Citizen	Lynn Kinstay and Gordon Plews	13-Sep-13
P236	Private Citizen	Paul Frizzell	13-Sep-13
P237	Private Citizen	Ralph Todd	13-Sep-13
P238	Private Citizen	Aury Todd	13-Sep-13
P239	Private Citizen	E. R. Harvey and Patricia A. Harvey	13-Sep-13
P240	Private Citizen	A.	20-Sep-13
P241	Private Citizen	Robert and Deborah Esser	20-Sep-13
P242	Private Citizen	Kelly Burke	20-Sep-13
P243	Private Citizen	Theresa Bartoo	13-Sep-13
P244	Private Citizen	John and Cynthia Sanger	20-Sep-13
P245	Private Citizen	Dr. Gary Charness	20-Sep-13
P246	Private Citizen	Gail Page	20-Sep-13
P247	Private Citizen	Cynthia Lynn Santana	20-Sep-13
P248	Private Citizen	Mark Taylor	20-Sep-13
P249	Private Citizen	Denison and Tami Bollay	20-Sep-13
P250	Private Citizen	Ken Karas	20-Sep-13
P251	Private Citizen	Susie Snow, Pat Wall and Jean Wall	20-Sep-13
P252	Private Citizen	Virginia Burroughs	20-Sep-13
P253	Private Citizen	Belinda and Robert Hart	20-Sep-13
P254	Private Citizen	Kyle Abello	20-Sep-13
P255	Private Citizen	Don Carter and Judy Carter	20-Sep-13
P256	Private Citizen	Julie Benson	20-Sep-13
P257	Private Citizen	Brandon Amyx	20-Sep-13
P258	Jedlicka's Saddlery	Josiah Jenkins	20-Sep-13
P259	Private Citizen	David and Lauren Watts	20-Sep-13
P260	Private Citizen	Michael Dunn	20-Sep-13
P261	Private Citizen	Shelia Benedict	20-Sep-13
P262	Private Citizen	Brian Kramer	17-Sep-13
P263	Private Citizen	Charlotte and John Valestra	19-Sep-13
P264	Private Citizen	Brian and Rosalie Culaciati	23-Sep-13

Letter Number	Agency/Organization	Name	Date Received
P265	Private Citizen	Elizabeth Truisdall	23-Sep-13
P266	Private Citizen	Mark Taylor	24-Sep-13
P267	Private Citizen	Josiah Jenkins	24-Sep-13
P268	Private Citizen	Della Casberg Deats	24-Sep-13
P269	Private Citizen	Paul R. Deats	24-Sep-13
P270	Private Citizen	Patricia and J.B. Hunter	27-Sep-13
P271	Private Citizen	Linda and Sid Kastner	28-Aug-13
P272	Private Citizen	Denison and Tami Bollay	20-Sep-13
P273	Private Citizen	Gerry B. Shepherd	21-Oct-13
P274	Private Citizen	Mark Tafelski	21-Oct-13
P275	Private Citizen	Jon Quirt	21-Oct-13
P276	Private Citizen	Michael Loman	21-Oct-13
P277	Private Citizen	Carol Petersen	21-Oct-13
P278	Private Citizen	Eric Baumgarten	21-Oct-13
P279	Private Citizen	Peter Van Iderstine	21-Oct-13
P280	Private Citizen	Jay Richolson	21-Oct-13
P281	Private Citizen	Patti Cotter, Broker Associate	21-Oct-13
P282	Private Citizen	James K. and Ruth A. Kunkle	21-Oct-13
P283	Cappello and Noel, LLP	Anne Marie Balash, Legal Secretary	21-Oct-13
P284	Peritus Asset Management, LLC	Charlotte Dodge, HR Manager/Office Manager	21-Oct-13
P285	Private Citizen	Louis Friedman	21-Oct-13
P286	Private Citizen	Sandra Jankowski	21-Oct-13
P287	Private Citizen	Linda Kastner	21-Oct-13
P288	Private Citizen	Sandra Jankowski	21-Oct-13
P289	Private Citizen	Andriette Culbertson	21-Oct-13
P290	Private Citizen	Kendall Mills	21-Oct-13
P291	Private Citizen	Kendall Mills	21-Oct-13
P292	Private Citizen	Linda Kastner	21-Oct-13
P293	Private Citizen	Dr. Jim and Mrs. Marilyn Elam	21-Oct-13
P294	Private Citizen	Chris Mills	21-Oct-13
P295	Private Citizen	Earl Shepard	21-Oct-13
P296	Private Citizen	Bruce and Kathie McBroom	21-Oct-13
P297	Private Citizen	Rebecca Flynn	21-Oct-13
P298	Private Citizen	Donn Crummer	21-Oct-13
P299	Private Citizen	Rob Walton	21-Oct-13
P300	Private Citizen	Kurt Alldredge	21-Oct-13
P301	Private Citizen	Caryn and Tom Cantella	21-Oct-13
P302	Private Citizen	Kenneth Day	21-Oct-13
P303	Private Citizen	William Otto	21-Oct-13
P304	Private Citizen	David Crosby	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P305	Private Citizen	Jeanne Glover	21-Oct-13
P306	Private Citizen	Caryn and Tom Cantella	21-Oct-13
P307	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	21-Oct-13
P308	Stand Up for California	Cheryl Schmit, Director	21-Oct-13
P309	Private Citizen	Russell Radom	21-Oct-13
P310	Private Citizen	L. C. Smith	21-Oct-13
P311	Cappello and Noel, LLP	Barry Cappello, Attorney for Nancy Crawford-Hall	21-Oct-13
P312	Private Citizen	Gerald Rounds	21-Oct-13
P313	Private Citizen	Mimi Walston	21-Oct-13
P314	Private Citizen	Mary Lloyd Mills	21-Oct-13
P315	Private Citizen	Jane and Marvin Johnson	21-Oct-13
P316	Private Citizen	Joan E. Brandoff	21-Oct-13
P317	Private Citizen	Joan Brandoff	21-Oct-13
P318	Private Citizen	Rachel Mojonnier	21-Oct-13
P319	Private Citizen	Kelly McConnell	21-Oct-13
P320	Private Citizen	Fred Garcia	21-Oct-13
P321	Private Citizen	Stefani Batastini	21-Oct-13
P322	Private Citizen	Kathyrn Elliott	21-Oct-13
P323	Private Citizen	Jennifer Solem	21-Oct-13
P324	Stand Up for California	Cheryl Schmit, Director	21-Oct-13
P325	Private Citizen	Brendan Crowley	21-Oct-13
P326	Todd Studio	Suzan Hamilton	21-Oct-13
P327	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	21-Oct-13
P328	Brownstein Hyatt Farber Schreck, LLC	Susan F. Petrovichm, Attorney for Charles Grimm	21-Oct-13
P329	Private Citizen	Klaus M. and Lois S. Brown	21-Oct-13
P330	Private Citizen	Peter Van Iderstine	21-Oct-13
P331	Private Citizen	Steve Wood	21-Oct-13
P332	Stand Up for California	Cheryl Schmit, Director	21-Oct-13
P333	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	21-Oct-13
P334	Stand Up for California	Cheryl Schmit, Director	21-Oct-13
P335	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	21-Oct-13
P336	Brownstein Hyatt Farber Schreck, LLC	Susan F. Petrovichm, Attorney for Charles Grimm	21-Oct-13
P337	Brownstein Hyatt Farber Schreck, LLC	Lyn Moore	21-Oct-13
P338	Private Citizen	David Bonifacio	21-Oct-13
P339	Private Citizen	Mary Ellen Licoscos	21-Oct-13
P340	Private Citizen	Tom	21-Oct-13
P341	Private Citizen	Alfred Balio	21-Oct-13
P342	Private Citizen	Mary J. McKinley	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P343	Private Citizen	Jorge Torres	21-Oct-13
P344	Private Citizen	Brandy Padilla	21-Oct-13
P345	Private Citizen	James R. Titsworth	21-Oct-13
P346	Private Citizen	Davina Castro	21-Oct-13
P347	Private Citizen	Tyrone D. Gardner	21-Oct-13
P348	Private Citizen	Jason Rieger	21-Oct-13
P349	Private Citizen	A. R.	21-Oct-13
P350	Private Citizen	Gustavo Calderon	21-Oct-13
P351	Private Citizen	Einesto M. Galvez	21-Oct-13
P352	Private Citizen	Adrian Valencia	21-Oct-13
P353	Private Citizen	Paul Furia	21-Oct-13
P354	Private Citizen	Michael Figueroa	21-Oct-13
P355	Private Citizen	Mike Norris	21-Oct-13
P356	Private Citizen	Jesus Solorio	21-Oct-13
P357	Private Citizen	Staci Klansky	21-Oct-13
P358	Private Citizen	Jim Manhardt	21-Oct-13
P359	Private Citizen	Ruben E. Camacho	21-Oct-13
P360	Private Citizen	Dennis Foss	21-Oct-13
P361	Private Citizen	J. Valencia	21-Oct-13
P362	Private Citizen	Emilio C.	21-Oct-13
P363	Private Citizen	Trevor Belen	21-Oct-13
P364	Private Citizen	Josefina Garibay	21-Oct-13
P365	Private Citizen	Jose A.	21-Oct-13
P366	Private Citizen	Florentinio Pina	21-Oct-13
P367	Private Citizen	Teresa Alvarado	21-Oct-13
P368	Private Citizen	Jamie Serrado	21-Oct-13
P369	Private Citizen	Josefina A. Ofecion	21-Oct-13
P370	Private Citizen	Perlita Q. Arca	21-Oct-13
P371	Private Citizen	Cuseneia M.	21-Oct-13
P372	Private Citizen	Christian Ramirez	21-Oct-13
P373	Private Citizen	R.	21-Oct-13
P374	Private Citizen	Rosalinda Mina	21-Oct-13
P375	Private Citizen	Vega	21-Oct-13
P376	Private Citizen	J.	21-Oct-13
P377	Private Citizen	Rosa Delabra	21-Oct-13
P378	Private Citizen	Jim	21-Oct-13
P379	Private Citizen	April Anderson	21-Oct-13
P380	Private Citizen	Irene L. Vega	21-Oct-13
P381	Private Citizen	Richard A Massa	21-Oct-13
P382	Private Citizen	R. G.	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P383	Private Citizen	Jose	21-Oct-13
P384	Private Citizen	Ruben Medina-Villa	21-Oct-13
P385	Private Citizen	Jose R. Ortiz	21-Oct-13
P386	Private Citizen	Jose Karleskint	21-Oct-13
P387	Private Citizen	Chris	21-Oct-13
P388	Private Citizen	Rafael Hernandez	21-Oct-13
P389	Private Citizen	Miguel N.	21-Oct-13
P390	Private Citizen	N. L.	21-Oct-13
P391	Private Citizen	C. V.	21-Oct-13
P392	Private Citizen	Ruendy Ayuayo	21-Oct-13
P393	Private Citizen	Diana Salvarado	21-Oct-13
P394	Private Citizen	M. Padilla	21-Oct-13
P395	Private Citizen	David Page	21-Oct-13
P396	Private Citizen	Dommgo Kahn	21-Oct-13
P397	Private Citizen	Illegible	21-Oct-13
P398	Private Citizen	Edward D. E.	21-Oct-13
P399	Private Citizen	Betty Kahn	21-Oct-13
P400	Private Citizen	Marili Aguilar	21-Oct-13
P401	Private Citizen	Belinda Miranda	21-Oct-13
P402	Private Citizen	Frances V. Montgomery	21-Oct-13
P403	Private Citizen	C. Jeanette Wulff	21-Oct-13
P404	Private Citizen	Mayra Sheley	21-Oct-13
P405	Private Citizen	Amber Ventura	21-Oct-13
P406	Private Citizen	Jesus Oseguera	21-Oct-13
P407	Private Citizen	Norman T. Hays	21-Oct-13
P408	Private Citizen	Brannon Soriarro	21-Oct-13
P409	Private Citizen	Yesenia Garcia	21-Oct-13
P410	Private Citizen	Judith E. Jacobs	21-Oct-13
P411	Private Citizen	Isabel Kalm	21-Oct-13
P412	Private Citizen	Orlando Z.	21-Oct-13
P413	Private Citizen	Donald White	21-Oct-13
P414	Private Citizen	Lorie Gill	21-Oct-13
P415	Private Citizen	Oscar Lozano	21-Oct-13
P416	Private Citizen	Gus Aguillon	21-Oct-13
P417	Private Citizen	Steve Chemoweth	21-Oct-13
P418	Private Citizen	Paul T. Ventura Jr.	21-Oct-13
P419	Private Citizen	Garry Ashbrooke	21-Oct-13
P420	Private Citizen	Jeremy Barnett	21-Oct-13
P421	Private Citizen	Takita Zaualla	21-Oct-13
P422	Private Citizen	Miguel Valencio Jr.	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P423	Private Citizen	Chris Jose	21-Oct-13
P424	Private Citizen	Anthony M. Winters	21-Oct-13
P425	Private Citizen	Illegible	21-Oct-13
P426	Private Citizen	Jimmy L. Riley	21-Oct-13
P427	Private Citizen	G.	21-Oct-13
P428	Private Citizen	David Lake	21-Oct-13
P429	Private Citizen	Adonis Felix	21-Oct-13
P430	Private Citizen	Aaron Robles	21-Oct-13
P431	Private Citizen	Eric P.	21-Oct-13
P432	Private Citizen	Ramones	21-Oct-13
P433	Private Citizen	Masanari Sasaki	21-Oct-13
P434	Private Citizen	N. M.	21-Oct-13
P435	Private Citizen	Adrianne Mendoza	21-Oct-13
P436	Private Citizen	Stephen Waldman	21-Oct-13
P437	Private Citizen	Norma Saldivar	21-Oct-13
P438	Private Citizen	Mark L. Cheli	21-Oct-13
P439	Private Citizen	Cole Wright	21-Oct-13
P440	Private Citizen	B. Julian	21-Oct-13
P441	Private Citizen	Laura Williams	21-Oct-13
P442	Private Citizen	Jose M. Rodriguez	21-Oct-13
P443	Private Citizen	Mercedes V.	21-Oct-13
P444	Private Citizen	Josephine Dodson	21-Oct-13
P445	Private Citizen	rosa Gonzalez	21-Oct-13
P446	Private Citizen	Illegible	21-Oct-13
P447	Private Citizen	Doninic Sanders	21-Oct-13
P448	Private Citizen	John Featherstone	21-Oct-13
P449	Private Citizen	Rudy Pompa	21-Oct-13
P450	Private Citizen	Hannah Valdez-Wallace	21-Oct-13
P451	Private Citizen	Paul F. Baker	21-Oct-13
P452	Private Citizen	Jonathan Bobbitt	21-Oct-13
P453	Private Citizen	Sergio Castillo	21-Oct-13
P454	Private Citizen	Matthew Peinado	21-Oct-13
P455	Private Citizen	Daniel Olivares	21-Oct-13
P456	Private Citizen	Zachary Fairhurst	21-Oct-13
P457	Private Citizen	Ted Funkhouser	21-Oct-13
P458	Private Citizen	Illegible	21-Oct-13
P459	Private Citizen	Illegible	21-Oct-13
P460	Private Citizen	William Christen	21-Oct-13
P461	Private Citizen	Clint Johnson	21-Oct-13
P462	Private Citizen	Larry Palato	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P463	Private Citizen	William L.	21-Oct-13
P464	Private Citizen	Jennifer McKinney	21-Oct-13
P465	Private Citizen	Ginger Flores	21-Oct-13
P466	Private Citizen	Abraham Huacnja	21-Oct-13
P467	Private Citizen	Gerry D.	21-Oct-13
P468	Private Citizen	Aaron Knight	21-Oct-13
P469	Private Citizen	D. G.	21-Oct-13
P470	Private Citizen	Michael Contrera	21-Oct-13
P471	Private Citizen	Luis Jauregui	21-Oct-13
P472	Private Citizen	Micheal Blancett	21-Oct-13
P473	Private Citizen	Andy Graciano	21-Oct-13
P474	Private Citizen	Marla R. Stahl	21-Oct-13
P475	Private Citizen	Wes Swan	21-Oct-13
P476	Private Citizen	Richard Beam	21-Oct-13
P477	Private Citizen	Bobby Rideout	21-Oct-13
P478	Private Citizen	Juston Davis	21-Oct-13
P479	Private Citizen	Illegible	21-Oct-13
P480	Private Citizen	A. P.	21-Oct-13
P481	Private Citizen	Martin Navarro	21-Oct-13
P482	Private Citizen	Lance Brown	21-Oct-13
P483	Private Citizen	Lucy Estrada	21-Oct-13
P484	Private Citizen	Nathan K.	21-Oct-13
P485	Private Citizen	Jeff L.	21-Oct-13
P486	Private Citizen	Jamie Espinoa	21-Oct-13
P487	Private Citizen	Consuelo B.	21-Oct-13
P488	Private Citizen	Guadalupe Seja	21-Oct-13
P489	Private Citizen	Elizabeth Ventura	21-Oct-13
P490	Private Citizen	Constance M. Salutan	21-Oct-13
P491	Private Citizen	John Vitorino	21-Oct-13
P492	Private Citizen	Milton Beard	21-Oct-13
P493	Private Citizen	Susan R.	21-Oct-13
P494	Private Citizen	Bruce Ramos	21-Oct-13
P495	Private Citizen	Tayler Smeester-Gonzales	21-Oct-13
P496	Private Citizen	Kathy A. Beard	21-Oct-13
P497	Private Citizen	Matt G.	21-Oct-13
P498	Private Citizen	Michael H.	21-Oct-13
P499	Private Citizen	Jennifer Raminez	21-Oct-13
P500	Private Citizen	Michael Aanerud	21-Oct-13
P501	Private Citizen	Janet Rodriguez	21-Oct-13
P502	Private Citizen	Maria Jones	21-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P503	Private Citizen	Tiffany Eastmark	21-Oct-13
P504	Private Citizen	Cassondra Swanson	21-Oct-13
P505	Private Citizen	Patricia Rodriguez Lopez	21-Oct-13
P506	Private Citizen	Vincent M Deluna	21-Oct-13
P507	Private Citizen	Edgar Romo	21-Oct-13
P508	Private Citizen	Tomas Alvarado	22-Oct-13
P509	Private Citizen	Mary Ellen Licoscos	22-Oct-13
P510	Private Citizen	Alfrod Bacio	22-Oct-13
P511	Private Citizen	Mary J. McKinley	22-Oct-13
P512	Private Citizen	Jorge Torres	22-Oct-13
P513	Private Citizen	Brandy A. Padilla	22-Oct-13
P514	Private Citizen	James R. Titsworth	22-Oct-13
P515	Private Citizen	Tyrone D. Gardner	22-Oct-13
P516	Private Citizen	Jason Rieger	22-Oct-13
P517	Private Citizen	C.B.	22-Oct-13
P518	Private Citizen	Gustavo Calderon	22-Oct-13
P519	Private Citizen	Einesto M. Galvez	22-Oct-13
P520	Private Citizen	Adrian Valencia	22-Oct-13
P521	Private Citizen	Paul Furia	22-Oct-13
P522	Private Citizen	Michael Figueroa	22-Oct-13
P523	Private Citizen	Mike Norris	22-Oct-13
P524	Private Citizen	Jesus Solorio	22-Oct-13
P525	Private Citizen	Staci Klansky	22-Oct-13
P526	Private Citizen	Jim Manhardt	22-Oct-13
P527	Private Citizen	Ruben F. Camacho	22-Oct-13
P528	Private Citizen	Dennis Foss	22-Oct-13
P529	Private Citizen	Jazmine Valencia	22-Oct-13
P530	Private Citizen	Emilio C.	22-Oct-13
P531	Private Citizen	Trevor Belen	22-Oct-13
P532	Private Citizen	Florentinio Pina	22-Oct-13
P533	Private Citizen	April Anderson	22-Oct-13
P534	Private Citizen	Jim	22-Oct-13
P535	Private Citizen	Rosa Delabra	22-Oct-13
P536	Private Citizen	J.	22-Oct-13
P537	Private Citizen	H.V.	22-Oct-13
P538	Private Citizen	none	22-Oct-13
P539	Private Citizen	Romeo A.	22-Oct-13
P540	Private Citizen	Christian Ramirez	22-Oct-13
P541	Private Citizen	C. Mepua	22-Oct-13
P542	Private Citizen	Perlita Q. Arca	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P543	Private Citizen	Josefina A. Ofecion	22-Oct-13
P544	Private Citizen	Jaime Serrano	22-Oct-13
P545	Private Citizen	Teresa Alvarado	22-Oct-13
P546	Private Citizen	Jose Aguire	22-Oct-13
P547	Private Citizen	Josefina Garibay	22-Oct-13
P548	Private Citizen	Irene L. Vega	22-Oct-13
P549	Private Citizen	Marili Aguilar	22-Oct-13
P550	Private Citizen	Richard A Massa	22-Oct-13
P551	Private Citizen	R. G.	22-Oct-13
P552	Private Citizen	Jose M.	22-Oct-13
P553	Private Citizen	Ruben Medina-Villa	22-Oct-13
P554	Private Citizen	Josa R. Ortiz	22-Oct-13
P555	Private Citizen	Joe Karleskint	22-Oct-13
P556	Private Citizen	Chris	22-Oct-13
P557	Private Citizen	Rafael Hernandez	22-Oct-13
P558	Private Citizen	Miguel N.	22-Oct-13
P559	Private Citizen	N. L.	22-Oct-13
P560	Private Citizen	C.	22-Oct-13
P561	Private Citizen	Ruendy Ayuayo	22-Oct-13
P562	Private Citizen	Diana Salvarado	22-Oct-13
P563	Private Citizen	Maria Padilla	22-Oct-13
P564	Private Citizen	David Page	22-Oct-13
P565	Private Citizen	Domingo Kahn	22-Oct-13
P566	Private Citizen	Meon Kidd	22-Oct-13
P567	Private Citizen	Edward Estave	22-Oct-13
P568	Private Citizen	Betty Kahn	22-Oct-13
P569	Private Citizen	Belinda Miranda	22-Oct-13
P570	Private Citizen	Frances V. Montgomery	22-Oct-13
P571	Private Citizen	C. Jeanette Wulff	22-Oct-13
P572	Private Citizen	Mayra Sheley	22-Oct-13
P573	Private Citizen	Amber Ventura	22-Oct-13
P574	Private Citizen	Jesus Oseguera	22-Oct-13
P575	Private Citizen	Norman T. Hays	22-Oct-13
P576	Private Citizen	Brannon Soriarro	22-Oct-13
P577	Private Citizen	Yesenia Garcia	22-Oct-13
P578	Private Citizen	U. K.	22-Oct-13
P579	Private Citizen	Orlando Z.	22-Oct-13
P580	Private Citizen	Donald White	22-Oct-13
P581	Private Citizen	Lorie Gill	22-Oct-13
P582	Private Citizen	Oscar Lozano	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P583	Private Citizen	Gus Aguillon	22-Oct-13
P584	Private Citizen	Steve Chemoweth	22-Oct-13
P585	Private Citizen	Paul T. Ventura Jr.	22-Oct-13
P586	Private Citizen	Matthew Peinado	22-Oct-13
P587	Private Citizen	Daniel Olivares	22-Oct-13
P588	Private Citizen	Zachary Fairhurst	22-Oct-13
P589	Private Citizen	Ted Funkhouser	22-Oct-13
P590	Private Citizen	Illegible	22-Oct-13
P591	Private Citizen	Illegible	22-Oct-13
P592	Private Citizen	William Christen	22-Oct-13
P593	Private Citizen	Clint Johnson	22-Oct-13
P594	Private Citizen	Larry Palato	22-Oct-13
P595	Private Citizen	William L.	22-Oct-13
P596	Private Citizen	Paul F. Baker	22-Oct-13
P597	Private Citizen	Jonathan Bobbitt	22-Oct-13
P598	Private Citizen	Sergio Castillo	22-Oct-13
P599	Private Citizen	Hannah Valdez-Wallace	22-Oct-13
P600	Private Citizen	Rudy Pompa	22-Oct-13
P601	Private Citizen	John Featherstone	22-Oct-13
P602	Private Citizen	Dominie Sanders	22-Oct-13
P603	Private Citizen	Rosa Gonzalez	22-Oct-13
P604	Private Citizen	Illegible	22-Oct-13
P605	Private Citizen	Norma Saldivar	22-Oct-13
P606	Private Citizen	Mercedes V.	22-Oct-13
P607	Private Citizen	Josephine Dodson	22-Oct-13
P608	Private Citizen	Jose M. Rodriguez	22-Oct-13
P609	Private Citizen	Laura Williams	22-Oct-13
P610	Private Citizen	David Robb	22-Oct-13
P611	Private Citizen	Chris Torrens	22-Oct-13
P612	Private Citizen	V.	22-Oct-13
P613	Private Citizen	Mark L. Cheli	22-Oct-13
P614	Private Citizen	Andy Graciano	22-Oct-13
P615	Private Citizen	Wes Swan	22-Oct-13
P616	Private Citizen	Marla R. Stahl	22-Oct-13
P617	Private Citizen	Richard Beam	22-Oct-13
P618	Private Citizen	Bobby Rideout	22-Oct-13
P619	Private Citizen	Justin Davis	22-Oct-13
P620	Private Citizen	Jan Lara	22-Oct-13
P621	Private Citizen	Luis Jauregui	22-Oct-13
P622	Private Citizen	Michael Contrera	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P623	Private Citizen	Michael Blancett	22-Oct-13
P624	Private Citizen	D. G.	22-Oct-13
P625	Private Citizen	Aaron Knight	22-Oct-13
P626	Private Citizen	Garry Ashbrooke	22-Oct-13
P627	Private Citizen	Jeremy Barnett	22-Oct-13
P628	Private Citizen	Takita Zaualla	22-Oct-13
P629	Private Citizen	Miguel Valencio Jr.	22-Oct-13
P630	Private Citizen	Chris Jose	22-Oct-13
P631	Private Citizen	Anthony M. Winters	22-Oct-13
P632	Private Citizen	Illegible	22-Oct-13
P633	Private Citizen	Jimmy L. Riley	22-Oct-13
P634	Private Citizen	Bill Perryman	22-Oct-13
P635	Private Citizen	David Lake	22-Oct-13
P636	Private Citizen	Adonis Felix	22-Oct-13
P637	Private Citizen	Aaron Robles	22-Oct-13
P638	Private Citizen	Eric P.	22-Oct-13
P639	Private Citizen	Ramones	22-Oct-13
P640	Private Citizen	Masanari Sasaki	22-Oct-13
P641	Private Citizen	N. M.	22-Oct-13
P642	Private Citizen	Gerry D.	22-Oct-13
P643	Private Citizen	Adrianne Mendoza	22-Oct-13
P644	Private Citizen	Stephen Waldman	22-Oct-13
P645	Private Citizen	Jennifer McKinney	22-Oct-13
P646	Private Citizen	Ginger Flores	22-Oct-13
P647	Private Citizen	Martin Navarro	22-Oct-13
P648	Private Citizen	Lance Brown	22-Oct-13
P649	Private Citizen	236 Point Sal Dunes Way, Guadalupe, CA 93434	22-Oct-13
P650	Private Citizen	Nathan K.	22-Oct-13
P651	Private Citizen	Consuelo B.	22-Oct-13
P652	Private Citizen	Jeff L.	22-Oct-13
P653	Private Citizen	Jamie Espinoa	22-Oct-13
P654	Private Citizen	Elizabeth Ventura	22-Oct-13
P655	Private Citizen	G. Seja	22-Oct-13
P656	Private Citizen	Constance M. Salutan	22-Oct-13
P657	Private Citizen	John Vitorino	22-Oct-13
P658	Private Citizen	Milton Beard	22-Oct-13
P659	Private Citizen	Susan Ramos	22-Oct-13
P660	Private Citizen	Bruce Ramos	22-Oct-13
P661	Private Citizen	Tayler Smeester-Gonzales	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P662	Private Citizen	Kathy A. Beard	22-Oct-13
P663	Private Citizen	Matt G.	22-Oct-13
P664	Private Citizen	Michael H	22-Oct-13
P665	Private Citizen	Jennifer Raminez	22-Oct-13
P666	Private Citizen	Michael Aanerud	22-Oct-13
P667	Private Citizen	Janet Rodriguez	22-Oct-13
P668	Private Citizen	Maria Jones	22-Oct-13
P669	Private Citizen	Tiffany Eastmark	22-Oct-13
P670	Private Citizen	Cassondra Swanson	22-Oct-13
P671	Private Citizen	Patricia Rodriguez Lopez	22-Oct-13
P672	Private Citizen	Vincent M Deluna	22-Oct-13
P673	Private Citizen	Edgar Romo	22-Oct-13
P674	Private Citizen	Amber Ventura	22-Oct-13
P675	Private Citizen	Norman T. Hays	22-Oct-13
P676	Private Citizen	Brannon Soriarro	22-Oct-13
P677	Private Citizen	Yesenia Garcia	22-Oct-13
P678	Private Citizen	Judith E. Jacobs	22-Oct-13
P679	Private Citizen	S. K.	22-Oct-13
P680	Private Citizen	Alberto Alvarado	22-Oct-13
P681	Private Citizen	Orlando Z.	22-Oct-13
P682	Private Citizen	Donald White	22-Oct-13
P683	Private Citizen	Lorie Gill	22-Oct-13
P684	Private Citizen	Oscar Lozano	22-Oct-13
P685	Private Citizen	Gus Aguillon	22-Oct-13
P686	Private Citizen	Steve Chemoweth	22-Oct-13
P687	Private Citizen	Paul T. Ventura Jr.	22-Oct-13
P688	Private Citizen	Garry Ashbrooke	22-Oct-13
P689	Private Citizen	Jeremy Barnett	22-Oct-13
P690	Private Citizen	Takita Zaualla	22-Oct-13
P691	Private Citizen	Miguel Valencio Jr.	22-Oct-13
P692	Private Citizen	Chris Jose	22-Oct-13
P693	Private Citizen	T.	22-Oct-13
P694	Private Citizen	Illegible	22-Oct-13
P695	Private Citizen	Jimmy L. Riley	22-Oct-13
P696	Private Citizen	Bill Perryman	22-Oct-13
P697	Private Citizen	David Lake	22-Oct-13
P698	Private Citizen	Adonis Felix	22-Oct-13
P699	Private Citizen	Aaron Robles	22-Oct-13
P700	Private Citizen	Eric P.	22-Oct-13
P701	Private Citizen	Ramones	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P702	Private Citizen	Masanari Sasaki	22-Oct-13
P703	Private Citizen	N. M.	22-Oct-13
P704	Private Citizen	Adrianne Mendoza	22-Oct-13
P705	Private Citizen	Stephen Waldman	22-Oct-13
P706	Private Citizen	Gerry D.	22-Oct-13
P707	Private Citizen	M. L.	22-Oct-13
P708	Private Citizen	Mark L. Cheli	22-Oct-13
P709	Private Citizen	Alexa Pitre	22-Oct-13
P710	Private Citizen	Jim T.	22-Oct-13
P711	Private Citizen	Francisco Hernandez	22-Oct-13
P712	Private Citizen	Casey Belluz	22-Oct-13
P713	Private Citizen	Laura Williams	22-Oct-13
P714	Private Citizen	Jose M. Rodriguez	22-Oct-13
P715	Private Citizen	Mercedes V.	22-Oct-13
P716	Private Citizen	Josephine Dodson	22-Oct-13
P717	Private Citizen	rosa Gonzalez	22-Oct-13
P718	Private Citizen	Illegible	22-Oct-13
P719	Private Citizen	Norma Saldivar	22-Oct-13
P720	Private Citizen	Dominic S.	22-Oct-13
P721	Private Citizen	John Featherstone	22-Oct-13
P722	Private Citizen	Rudy Pompa	22-Oct-13
P723	Private Citizen	Hannah Valdez-Wallace	22-Oct-13
P724	Private Citizen	Paul F. Baker	22-Oct-13
P725	Private Citizen	Jonathan Bobbitt	22-Oct-13
P726	Private Citizen	Sergio Castillo	22-Oct-13
P727	Private Citizen	Matthew Peinado	22-Oct-13
P728	Private Citizen	Daniel Olivares	22-Oct-13
P729	Private Citizen	Zachary Fairhurst	22-Oct-13
P730	Private Citizen	Ted Funkhouser	22-Oct-13
P731	Private Citizen	J. E. M.	22-Oct-13
P732	Private Citizen	Illegible	22-Oct-13
P733	Private Citizen	William Christen	22-Oct-13
P734	Private Citizen	Clint Johnson	22-Oct-13
P735	Private Citizen	Larry Palato	22-Oct-13
P736	Private Citizen	William L.	22-Oct-13
P737	Private Citizen	Jennifer McKinney	22-Oct-13
P738	Private Citizen	Ginger Flores	22-Oct-13
P739	Private Citizen	Martin Navarro	22-Oct-13
P740	Private Citizen	Lance Brown	22-Oct-13
P741	Private Citizen	Lucy Estrada	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P742	Private Citizen	Nathan K.	22-Oct-13
P743	Private Citizen	Consuelo B.	22-Oct-13
P744	Private Citizen	Jeff L.	22-Oct-13
P745	Private Citizen	Jamie Espinoa	22-Oct-13
P746	Private Citizen	Elizabeth Ventura	22-Oct-13
P747	Private Citizen	Guadalupe Seja	22-Oct-13
P748	Private Citizen	Constance M. Salutan	22-Oct-13
P749	Private Citizen	John Vitorino	22-Oct-13
P750	Private Citizen	Milton Beard	22-Oct-13
P751	Private Citizen	Susan Ramos	22-Oct-13
P752	Private Citizen	Bruce Ramos	22-Oct-13
P753	Private Citizen	Tayler Smeester-Gonzales	22-Oct-13
P754	Private Citizen	Kathy A. Beard	22-Oct-13
P755	Private Citizen	Illegible	22-Oct-13
P756	Private Citizen	Michael H	22-Oct-13
P757	Private Citizen	Jennifer Raminez	22-Oct-13
P758	Private Citizen	Michael Aanerud	22-Oct-13
P759	Private Citizen	Janet Rodriguez	22-Oct-13
P760	Private Citizen	Maria Jones	22-Oct-13
P761	Private Citizen	Tiffany Eastmark	22-Oct-13
P762	Private Citizen	Cassondra Swanson	22-Oct-13
P763	Private Citizen	Patricia Rodriguez Lopez	22-Oct-13
P764	Private Citizen	Vincent M Deluna	22-Oct-13
P765	Private Citizen	Edgar Romo	22-Oct-13
P766	Private Citizen	Mary Ellen Licoscos	22-Oct-13
P767	Private Citizen	Tomas Alvarado	22-Oct-13
P768	Private Citizen	Mary J. McKinley	22-Oct-13
P769	Private Citizen	Jorge Torres	22-Oct-13
P770	Private Citizen	Brandy A. Padilla	22-Oct-13
P771	Private Citizen	James	22-Oct-13
P772	Private Citizen	Tyrone D. Gardner	22-Oct-13
P773	Private Citizen	Jason Rieger	22-Oct-13
P774	Private Citizen	C.B.	22-Oct-13
P775	Private Citizen	Gustavo Calderon	22-Oct-13
P776	Private Citizen	Einesto M. Galvez	22-Oct-13
P777	Private Citizen	Adrian Valencia	22-Oct-13
P778	Private Citizen	Paul Furia	22-Oct-13
P779	Private Citizen	Michael Figueroa	22-Oct-13
P780	Private Citizen	Mike	22-Oct-13
P781	Private Citizen	Jesus Solorio	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P782	Private Citizen	Staci Klansky	22-Oct-13
P783	Private Citizen	Jim Manhardt	22-Oct-13
P784	Private Citizen	Ruben Camaho	22-Oct-13
P785	Private Citizen	Dennis Foss	22-Oct-13
P786	Private Citizen	Jazmine Valencia	22-Oct-13
P787	Private Citizen	Trevor Belen	22-Oct-13
P788	Private Citizen	Emilio C.	22-Oct-13
P789	Private Citizen	April Anderson	22-Oct-13
P790	Private Citizen	J. G.	22-Oct-13
P791	Private Citizen	Rosa Delabra	22-Oct-13
P792	Private Citizen	Justin M.	22-Oct-13
P793	Private Citizen	H. Vega	22-Oct-13
P794	Private Citizen	none	22-Oct-13
P795	Private Citizen	R. A.	22-Oct-13
P796	Private Citizen	Christian Ramirez	22-Oct-13
P797	Private Citizen	C. Mepua	22-Oct-13
P798	Private Citizen	Perlita Q. Arca	22-Oct-13
P799	Private Citizen	Josefina A. Ofecion	22-Oct-13
P800	Private Citizen	Jamie Serraneo	22-Oct-13
P801	Private Citizen	Teresa Alvarado	22-Oct-13
P802	Private Citizen	Jose Aguire	22-Oct-13
P803	Private Citizen	Florentinio Pina	22-Oct-13
P804	Private Citizen	Josefina Garibay	22-Oct-13
P805	Private Citizen	Irene L. Vega	22-Oct-13
P806	Private Citizen	Richard A Massa	22-Oct-13
P807	Private Citizen	R. G.	22-Oct-13
P808	Private Citizen	Jose Mava	22-Oct-13
P809	Private Citizen	Ruben Medina-Villa	22-Oct-13
P810	Private Citizen	Jose Richardo Ortiz	22-Oct-13
P811	Private Citizen	Joe Karleskint	22-Oct-13
P812	Private Citizen	Chris	22-Oct-13
P813	Private Citizen	Rafael S. Hernandez	22-Oct-13
P814	Private Citizen	Miguel N.	22-Oct-13
P815	Private Citizen	C. V.	22-Oct-13
P816	Private Citizen	Ruendy Aguayo	22-Oct-13
P817	Private Citizen	Diana Salvarado	22-Oct-13
P818	Private Citizen	Maria Padrilla	22-Oct-13
P819	Private Citizen	David Page	22-Oct-13
P820	Private Citizen	Domingo Kahn	22-Oct-13
P821	Private Citizen	Ridd	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P822	Private Citizen	Edward Estave	22-Oct-13
P823	Private Citizen	Betty Kahn	22-Oct-13
P824	Private Citizen	Marili Aguilar	22-Oct-13
P825	Private Citizen	Belinda Miranda	22-Oct-13
P826	Private Citizen	Frances V. Montgomery	22-Oct-13
P827	Private Citizen	C. Jeanette Wulff	22-Oct-13
P828	Private Citizen	Mayra Sheley	22-Oct-13
P829	Private Citizen	Jeffrey N. Baugher	22-Oct-13
P830	Private Citizen	Mary Ellen Licoscos	22-Oct-13
P831	Private Citizen	Tomas Alvarado	22-Oct-13
P832	Private Citizen	Mary J. McKinley	22-Oct-13
P833	Private Citizen	Jorge Torres	22-Oct-13
P834	Private Citizen	Brandy A. Padilla	22-Oct-13
P835	Private Citizen	James R. Titsworth	22-Oct-13
P836	Private Citizen	April Anderson	22-Oct-13
P837	Private Citizen	Tyrone D. Gardner	22-Oct-13
P838	Private Citizen	Jason Rieger	22-Oct-13
P839	Private Citizen	C. R.	22-Oct-13
P840	Private Citizen	Gustavo Calderon	22-Oct-13
P841	Private Citizen	Einesto M. Galvez	22-Oct-13
P842	Private Citizen	Adrian Valencia	22-Oct-13
P843	Private Citizen	Paul Furia	22-Oct-13
P844	Private Citizen	Michael Figueroa	22-Oct-13
P845	Private Citizen	Mike Norris	22-Oct-13
P846	Private Citizen	Jesus Solorio	22-Oct-13
P847	Private Citizen	Staci Klansky	22-Oct-13
P848	Private Citizen	Dennis Foss	22-Oct-13
P849	Private Citizen	Ruben E. C.	22-Oct-13
P850	Private Citizen	Jim Manhardt	22-Oct-13
P851	Private Citizen	Trevor Belen	22-Oct-13
P852	Private Citizen	Jazmine Valencia	22-Oct-13
P853	Private Citizen	Emilio C.	22-Oct-13
P854	Private Citizen	Jim G.	22-Oct-13
P855	Private Citizen	Rosa Delabra	22-Oct-13
P856	Private Citizen	Justin M.	22-Oct-13
P857	Private Citizen	H. Vega	22-Oct-13
P858	Private Citizen	Illegible	22-Oct-13
P859	Private Citizen	Christian Ramirez	22-Oct-13
P860	Private Citizen	C. Mepua	22-Oct-13
P861	Private Citizen	Perlita Q. Arca	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P862	Private Citizen	Josefina A. Ofecion	22-Oct-13
P863	Private Citizen	Jaime Serrano	22-Oct-13
P864	Private Citizen	Teresa Alvarado	22-Oct-13
P865	Private Citizen	Jose Aguire	22-Oct-13
P866	Private Citizen	Florentinio Pina	22-Oct-13
P867	Private Citizen	Josefina Garibay	22-Oct-13
P868	Private Citizen	Irene L. Vega	22-Oct-13
P869	Private Citizen	Richard A Massa	22-Oct-13
P870	Private Citizen	R. G.	22-Oct-13
P871	Private Citizen	J. Mava	22-Oct-13
P872	Private Citizen	Ruben Medina-Villa	22-Oct-13
P873	Private Citizen	Jose Richardo Ortiz	22-Oct-13
P874	Private Citizen	Joe Karleskint	22-Oct-13
P875	Private Citizen	Chris K.	22-Oct-13
P876	Private Citizen	Rafael S. Hernandez	22-Oct-13
P877	Private Citizen	Miguel N.	22-Oct-13
P878	Private Citizen	N. L.	22-Oct-13
P879	Private Citizen	C. V.	22-Oct-13
P880	Private Citizen	Ruendy Aguayo	22-Oct-13
P881	Private Citizen	Diana Salvarado	22-Oct-13
P882	Private Citizen	Maria Padrilla	22-Oct-13
P883	Private Citizen	David Page	22-Oct-13
P884	Private Citizen	Domingo Kahn	22-Oct-13
P885	Private Citizen	Illegible	22-Oct-13
P886	Private Citizen	Edward Estave	22-Oct-13
P887	Private Citizen	Betty Kahn	22-Oct-13
P888	Private Citizen	Marili Aguilar	22-Oct-13
P889	Private Citizen	Belinda Miranda	22-Oct-13
P890	Private Citizen	Frances V. Montgomery	22-Oct-13
P891	Private Citizen	C. Jeanette Wulff	22-Oct-13
P892	Private Citizen	Mayra Sheley	22-Oct-13
P893	Private Citizen	Amber Ventura	22-Oct-13
P894	Private Citizen	Norman T. Hays	22-Oct-13
P895	Private Citizen	Brannon Soriarro	22-Oct-13
P896	Private Citizen	Yesenia Garcia	22-Oct-13
P897	Private Citizen	Judith E. Jacobs	22-Oct-13
P898	Private Citizen	K.	22-Oct-13
P899	Private Citizen	Orlando Z.	22-Oct-13
P900	Private Citizen	Donald White	22-Oct-13
P901	Private Citizen	Lorie Gill	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P902	Private Citizen	Oscar Lozano	22-Oct-13
P903	Private Citizen	Gus Aguillon	22-Oct-13
P904	Private Citizen	Steve Chemoweth	22-Oct-13
P905	Private Citizen	Paul T. Ventura Jr.	22-Oct-13
P906	Private Citizen	Garry Ashbrooke	22-Oct-13
P907	Private Citizen	Jeremy Barnett	22-Oct-13
P908	Private Citizen	Takita Zaualla	22-Oct-13
P909	Private Citizen	Valencia Jr.	22-Oct-13
P910	Private Citizen	Chris Jose	22-Oct-13
P911	Private Citizen	Anthony M. Winters	22-Oct-13
P912	Private Citizen	Illegible	22-Oct-13
P913	Private Citizen	Jimmy L. Riley	22-Oct-13
P914	Private Citizen	Bill Perryman	22-Oct-13
P915	Private Citizen	David Lake	22-Oct-13
P916	Private Citizen	Adonis Felix	22-Oct-13
P917	Private Citizen	Aaron Robles	22-Oct-13
P918	Private Citizen	Eric P.	22-Oct-13
P919	Private Citizen	Ramones	22-Oct-13
P920	Private Citizen	Masanari Sasaki	22-Oct-13
P921	Private Citizen	Nannette Mendoza	22-Oct-13
P922	Private Citizen	Adrianne Mendoza	22-Oct-13
P923	Private Citizen	Stephen Waldman	22-Oct-13
P924	Private Citizen	Gerry Donaghy	22-Oct-13
P925	Private Citizen	M. Warrick	22-Oct-13
P926	Private Citizen	Daniel Kearney	22-Oct-13
P927	Private Citizen	Mark Cheli	22-Oct-13
P928	Private Citizen	Arthur Harford	22-Oct-13
P929	Private Citizen	Cherry	22-Oct-13
P930	Private Citizen	Mandy Herrara	22-Oct-13
P931	Private Citizen	Laura Williams	22-Oct-13
P932	Private Citizen	Jose M. Rodriguez	22-Oct-13
P933	Private Citizen	Mercedes V.	22-Oct-13
P934	Private Citizen	Josephine Dodson	22-Oct-13
P935	Private Citizen	rosa Gonzalez	22-Oct-13
P936	Private Citizen	Illegible	22-Oct-13
P937	Private Citizen	Norma Saldivar	22-Oct-13
P938	Private Citizen	Dominic Sanders	22-Oct-13
P939	Private Citizen	John Featherstone	22-Oct-13
P940	Private Citizen	Rudy Pompa	22-Oct-13
P941	Private Citizen	Hannah Valdez-Wallace	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P942	Private Citizen	Paul F. Baker	22-Oct-13
P943	Private Citizen	Jonathon Bobbit	22-Oct-13
P944	Private Citizen	Sergio Castillo	22-Oct-13
P945	Private Citizen	Matthew Peinado	22-Oct-13
P946	Private Citizen	Daniel Olivares	22-Oct-13
P947	Private Citizen	Zachary Fairhurst	22-Oct-13
P948	Private Citizen	Ted Funkhouser	22-Oct-13
P949	Private Citizen	J. E. M.	22-Oct-13
P950	Private Citizen	Illegible	22-Oct-13
P951	Private Citizen	William Christen	22-Oct-13
P952	Private Citizen	Clint Johnson	22-Oct-13
P953	Private Citizen	Larry Palato	22-Oct-13
P954	Private Citizen	William L.	22-Oct-13
P955	Private Citizen	Jennifer McKinney	22-Oct-13
P956	Private Citizen	Ginger Flores	22-Oct-13
P957	Private Citizen	Jeff L.	22-Oct-13
P958	Private Citizen	Jamie Espinoa	22-Oct-13
P959	Private Citizen	Elizabeth Ventura	22-Oct-13
P960	Private Citizen	Guadalupe Seja	22-Oct-13
P961	Private Citizen	Constance M. Salutan	22-Oct-13
P962	Private Citizen	J.	22-Oct-13
P963	Private Citizen	Milton Beard	22-Oct-13
P964	Private Citizen	Susan Ramos	22-Oct-13
P965	Private Citizen	Bruce Ramos	22-Oct-13
P966	Private Citizen	Tayler Smeester-Gonzales	22-Oct-13
P967	Private Citizen	Kathy A. Beard	22-Oct-13
P968	Private Citizen	Matt G.	22-Oct-13
P969	Private Citizen	Consuelo B.	22-Oct-13
P970	Private Citizen	Nathan K.	22-Oct-13
P971	Private Citizen	Lucy Estrada	22-Oct-13
P972	Private Citizen	Lance Brown	22-Oct-13
P973	Private Citizen	Martin Navarro	22-Oct-13
P974	Private Citizen	M. H.	22-Oct-13
P975	Private Citizen	Jennifer Raminez	22-Oct-13
P976	Private Citizen	Michael Aanerud	22-Oct-13
P977	Private Citizen	Janet Rodriguez	22-Oct-13
P978	Private Citizen	Maria Jones	22-Oct-13
P979	Private Citizen	Tiffany Eastmark	22-Oct-13
P980	Private Citizen	Cassondra Swanson	22-Oct-13
P981	Private Citizen	Patricia Rodriguez Lopez	22-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P982	Private Citizen	Vincent M Deluna	22-Oct-13
P983	Private Citizen	Edgar Romo	22-Oct-13
P984	Private Citizen	Caryn and Tom Cantella	22-Oct-13
P985	Private Citizen	Caryn Cantella	22-Oct-13
P986	Private Citizen	Tom Cantella	22-Oct-13
P987	Private Citizen	Kathleen S. Day	22-Oct-13
P988	Private Citizen	Kenneth P. Day	22-Oct-13
P989	Private Citizen	Kenneth P. Day	22-Oct-13
P990	Private Citizen	William J Otto	22-Oct-13
P991	Private Citizen	John D. Wrench	22-Oct-13
P992	Private Citizen	Elizabeth Gill	22-Oct-13
P993	Cappello and Noel, LLP	Barry Cappello, Attorney for Nancy Crawford-Hall	22-Oct-13
P994	Private Citizen	John and Cynthia Sanger	13-Sep-13
P995	Private Citizen	Mimi Watson	22-Oct-13
P996	Santa Barbara Audubon Society	Stephen J. Ferry, Co-President	22-Oct-13
P997	Private Citizen	Fred Kovol	22-Oct-13
P998	Santa Ynez Valley Alliance	Mark Oliver, President	22-Oct-13
P999	Hunt and Associates, Biological Consulting Services	Lawrence E. Hunt	22-Oct-13
P1000	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	22-Oct-13
P1001	Stand Up for California	Cheryl Schmit, Director	22-Oct-13
P1002	Private Citizen	Bunnie Shepherd Sexton	22-Oct-13
P1003	Private Citizen	Gerry B. Shepherd	22-Oct-13
P1004	Private Citizen	Earl Shepherd	22-Oct-13
P1005	Brownstein Hyatt Farber Schreck, LLC	Susan F. Petrovichm, Attorney for Charles Grimm	22-Oct-13
P1006	Private Citizen	Wim van Dam	22-Oct-13
P1007	Private Citizen	G. B. Shepherd	22-Oct-13
P1008	Private Citizen	G. B. Shepherd	22-Oct-13
P1009	We Watch, Inc.	Cathie McHenry, President	22-Oct-13
P1010	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	22-Oct-13
P1011	Private Citizen	Kelly Gray	22-Oct-13
P1012	Santa Ynez Rancho Estates Mutual Water Company, Inc. Board of Directors	Robert B. Field, President	22-Oct-13
P1013	Private Citizen	C. David and M. Andriette Culbertson	22-Oct-13
P1014	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	21-Oct-13
P1015	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	21-Oct-13
P1016	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	21-Oct-13
P1017	Private Citizen	John G. Traller	25-Oct-13
P1018	Santa Ynez Valley Concerned Citizens	Greg Simon, Chairman	25-Oct-13
P1019	Save The Valley Plan (SVTP)	William R. Devine	25-Oct-13

Letter Number	Agency/Organization	Name	Date Received
P1020	Coalition of Agriculture and Business (COLAB)	J. Andrew Caldwell	31-Oct-13
P1021	No More Slots	James E. Marino, Attorney	31-Oct-13
P1022	No More Slots	James E. Marino, Attorney	5-Nov-13
P1023	Private Citizen	Bill Krauch	18-Nov-13
P1024	Private Citizen	Craig E. Juratsch, MD	15-Nov-13
P1025	Private Citizen	John Burnaby	15-Nov-13
P1026	Private Citizen	Susan Cobb Gorham	13-Nov-13
P1027	Private Citizen	Terryl L. Bunn	13-Nov-13
P1028	Private Citizen	Steve Wood	13-Nov-13
P1029	Private Citizen	Renee and Michael Kelleher	12-Nov-13
P1030	Private Citizen	Dr. James H. Riley	11-Nov-13
P1031	Private Citizen	Patricia Murphy	11-Nov-13
P1032	Preservation of Los Olivos (P.O.L.O)	Tom Cantella	11-Nov-13
P1033	Preservation of Los Olivos (P.O.L.O)	Caryn Cantella	11-Nov-13
P1034	Save The Valley Plan (SVTP)	William R. Devine	11-Nov-13
P1035	Brownstein Hyatt Farber Schreck, LLC	April Robitaille	11-Nov-13
P1036	Private Citizen	Kathy Langager	11-Nov-13
P1037	Preservation of Los Olivos (P.O.L.O)	Kelly Burke	11-Nov-13
P1038	Private Citizen	Gary and Anna Nett	11-Nov-13
P1039	Private Citizen	Daniel Hall	11-Nov-13
P1040	Private Citizen	Mike and Sherry Duckett	10-Nov-13
P1041	Preservation of Los Olivos (P.O.L.O)	Michelle Griffoul	10-Nov-13
P1042	Private Citizen	Mr. and Mrs. Robert P. Tucker	10-Nov-13
P1043	Private Citizen	Antoinette Addison	10-Nov-13
P1044	Preservation of Los Olivos (P.O.L.O)	Brian and Rosalie Culaciati	10-Nov-13
P1045	Private Citizen	Shawn Addison	10-Nov-13
P1046	Private Citizen	Patricia Donato	9-Nov-13
P1047	Private Citizen	Michael A. Dunn	8-Nov-13
P1048	Private Citizen	Sybil Cline	8-Nov-13
P1049	Private Citizen	Tom Fiorentine	8-Nov-13
P1050	Preservation of Los Olivos (P.O.L.O)	Susan Nelson	8-Nov-13
P1051	Private Citizen	Klaus and Lois Brown	8-Nov-13
P1052	Private Citizen	Bill Keese	8-Nov-13
P1053	Board of Realtors	Jeanne Hollingsworth	8-Nov-13
P1054	Private Citizen	Ann Janis	8-Nov-13
P1055	Private Citizen	Judith Stauffer	8-Nov-13
P1056	Private Citizen	Kathleen L. Ealand	8-Nov-13
P1057	Private Citizen	Mike McGill	8-Nov-13
P1058	Private Citizen	George and Marcia Gibson	8-Nov-13

Letter Number	Agency/Organization	Name	Date Received
P1059	Private Citizen	Andrew Fleming	8-Nov-13
P1060	Preservation of Los Olivos (P.O.L.O)	Cheri Peake	8-Nov-13
P1061	Private Citizen	Teri Harmon	8-Nov-13
P1062	Private Citizen	Charles R. Grimm	8-Nov-13
P1063	Private Citizen	Fred Kovol	8-Nov-13
P1064	Private Citizen	Kelly Rose	8-Nov-13
P1065	Private Citizen	Kelly Rose	8-Nov-13
P1066	Private Citizen	Paul R. Deats	7-Nov-13
P1067	Private Citizen	Della Casberg Deats	7-Nov-13
P1068	Private Citizen	Dr. R. Jensen	8-Nov-13
P1069	Private Citizen	Kelly Rose	8-Nov-13
P1070	Private Citizen	Kelly Rose	8-Nov-13
P1071	Private Citizen	Paul R. Deats	7-Nov-13
P1072	Private Citizen	Della Casberg Deats	7-Nov-13
P1073	Private Citizen	Mark Preston	7-Nov-13
P1074	Private Citizen	Lucy and Patrick McCarthy	7-Nov-13
P1075	Private Citizen	Jack and Pat Hoffman	7-Nov-13
P1076	Preservation of Los Olivos (P.O.L.O)	Peggy Royer	7-Nov-13
P1077	Private Citizen	Brad Joos	7-Nov-13
P1078	Preservation of Los Olivos (P.O.L.O)	Joe Bocchino	7-Nov-13
P1079	Private Citizen	Bruce Mocettini	7-Nov-13
P1080	Private Citizen	Harvey Saarloos	7-Nov-13
P1081	Private Citizen	Sheila Benedict	7-Nov-13
P1082	Private Citizen	Russ Moir	7-Nov-13
P1083	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	7-Nov-13
P1084	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	6-Nov-13
P1085	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	6-Nov-13
P1086	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	6-Nov-13
P1087	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	10-Dec-13
P1088	Santa Ynez Rancho Estates Mutual Water Company, Inc. Board of Directors	Robert B. Field, President	4-Dec-13
P1089	Private Citizen	A. Barry Cappello, Attorneys for Nancy Crawford-Hall	4-Dec-13
P1090	No More Slots	James E. Marino, Attorney	23-Dec-13
P1091	Santa Ynez Valley Concerned Citizens	Gerry Shepherd, Board Member	23-Dec-13
P1092	Private Citizen	Linda Kastner	16-Dec-13
P1093	Stand Up for California	Cheryl Schmit, Director	20-Dec-13
P1094	Private Citizen	Erica Williams	30-Dec-13
P1095	Preservation of Los Olivos (P.O.L.O)	Kathy Cleary, Board President	16-Dec-13
P1096	Private Citizen	Kelly Burke	6-Jan-14
P1097	Private Citizen	Ryan Williams	9-Jan-14

Letter Number	Agency/Organization	Name	Date Received
P1098	Private Citizen	Sean Wilczak	23-Dec-13
P1099	Private Citizen	Kelly Gray	16-Dec-13
P1100	Private Citizen	Klaus & Lois Brown	6-Jan-14
P1101	Private Citizen	Caryn and Tom Cantella	6-Jan-14
P1102	Santa Ynez Rancho Estates Mutual Water Company	Robert B. Field, President, Board of Directors	20-Dec-13

STATE AGENCIES (S)

COMMENT LETTERS

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
http://www.dot.ca.gov/dist05/

Flex your power!
Be energy efficient!

September 18, 2013

Chad Broussard
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento CA 95825

SB 154 PM 08.00
SCH 2013084004

Dear Mr. Broussard:

COMMENTS ON THE ENVIRONMENTAL ASSESSMENT OF THE SANTA YNEZ BAND OF CHUMASH INDIANS CAMP 4 FEE-TO-TRUST PROJECT

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee-To-Trust project.

Caltrans has the following comments on the traffic study contained in the EA:

1) **Incorrect State Level-of-Service (LOS) Threshold**
The traffic study states "The Caltrans Transportation Concept Report shows LOS D as the minimum operating standard for both SR 154 and SR 246." (pg. 6). This is a misapplication of the *Caltrans Transportation Concept Report* (TCR). This document is only intended as a general long range planning tool and not to determine project specific level impacts or mitigations. The consultant ATE has been informed of this on many other projects and we regret to see this misapplication here again. The current minimum standard for all state highways is LOS C, as outlined in the *Caltrans Guide for the Preparation of Traffic Impact Studies*.

S1-01

2) **Peak Hour Factor**
A Peak Hour Factor (PHF) of 1.00 was used for all traffic analysis in this traffic study. Due to inaccurate design-hour flow rates through the lack of a PHF, the algorithms employing these design-hour flow (volumes in this case) rates produced inaccurate results. The lack of a peak-hour factor is inconsistent with the methodology outlined in the Highway Capacity Manual (HCM), and would only reflect better than actual operating conditions. Caltrans request a revisit of the proper calculating procedures outlined in the Highway Capacity Manual. We strongly recommend that the calculations follow HCM procedures and to cease using volumes in place of the required flow rate, as per HCM methodology. As the HCM makes clear:

"• Volume—the total number of vehicles that pass over a given point or section of lane or roadway during a given time interval; volumes can be expressed in terms of annual, daily, hourly, or subhourly periods.

S1-02
(Cont.)

• Flow rate—the equivalent hourly rate at which vehicles pass over a given point or section of a lane or roadway during a given time interval of less than 1 h, usually 15 min. Volume and flow are variables that quantify demand, that is, the number of vehicle occupants or drivers (usually expressed as the number of vehicles) who desire to use a given facility during a specific time period. Congestion can influence demand, and observed volumes sometimes reflect capacity constraints rather than true demand.

The distinction between volume and flow rate is important. Volume is the number of vehicles observed or predicted to pass a point during a time interval. Flow rate represents the number of vehicles passing a point during a time interval less than 1 h, but expressed as an equivalent hourly rate. A flow rate is the number of vehicles observed in a subhourly period, divided by the time (in hours) of the observation. For example, a volume of 100 vehicles observed in a 15-min period implies a flow rate of 100 veh/0.25 h or 400 veh/h.

Volume and flow rate can be illustrated by the volumes observed for four consecutive 15-min periods. The four counts are 1,000, 1,200, 1,100, and 1,000. The total volume for the hour is the sum of these counts, or 4,300 veh. The flow rate, however, varies for each 15-min period. During the 15-min period of maximum flow, the flow rate is 1,200 veh/0.25 h, or 4,800 veh/h. Note that 4,800 vehicles do not pass the observation point during the study hour, but they do pass at that rate for 15 min.

Consideration of peak flow rates is important in capacity analysis. If the capacity of the segment of highway studied is 4,500 veh/h, capacity would be exceeded during the peak 15-min period of flow, when vehicles arrive at a rate of 4,800 veh/h, even though volume is less than capacity during the full hour. ***This is a serious problem, because dissipating a breakdown of capacity can extend congestion for up to several hours."*** (HCM, Pg 7-1)

*"Consideration of Peaks is Important. Congestion due to inadequate capacity occurring for only a few minutes can take substantial time to dissipate because of the dynamics of breakdown flow. Fifteen-min flow rates have been selected as the basis for procedures of this manual. The relationship between the peak 15-min flow rate and the full hourly volume is given by the peak-hour factor (**PHF**). Whether the design hour is measured, established from the analysis of peaking patterns or based on modeled demand, the **PHF is applied to determine design-hour flow rates.**"* (HCM, Pg.8-9)

S1-02 (Cont.)

3) **Two-way Stop Controlled Intersection (TWSC) at State Route 246 and State Route 154**
The consultant has repeatedly misapplied the Highway Capacity Manual. Intersection LOS is determined by the LOS of the minor approaches and major approaches, *separately*. However, the consultant has performed a weighted average on all the approaches to determine the intersection's LOS. The averaging of LOS for all approaches of a TWSC intersection violates HCM methodology. By applying a weighted average to determine overall delay, the minor movements (those that carry the highest delay with lowest volumes) will be overshadowed by the larger volume of traffic that doesn't have a stop control. This tactic will yield results that show a better scenario than what would actually be experienced in the field. Again, Caltrans requests that the consultant revisit proper calculating procedures outlined in the Highway Capacity Manual. The worksheets demonstrate that a significant number of studied intersections fall below the State's LOS standard of C. As the HCM makes clear:

S1-03

"LOS is determined for each minor-street movement (or shared movement) as well as major-street left turns by using criteria given in Exhibit 19-1. LOS is not defined for the intersection as a whole or for major-street approaches for three primary reasons: (a) major-street through vehicles are assumed to experience zero delay; (b) the disproportionate number of major-street through vehicles at a typical TWSC intersection skews the weighted average of all movements, resulting in a very low overall average delay for all vehicles; and (c) the resulting low delay can mask important LOS deficiencies for minor movements" (HCM, 19-1).

"Level of service (LOS) for a TWSC intersection is determined by the computed or measured control delay and is defined for each minor movement. LOS is not defined as the intersection as a whole. "(HCM, Pg. 17-1)

"LOS is not defined for the overall intersection". (HCM, Pg. 17-1)

S1-03 (Cont.)

4) **Mitigation**
A significant number of intersections have been shown to be negatively impacted, having fallen below the LOS C/D cusp with the introduction of this project. Yet there is no mitigation analysis for the project's impacts. Caltrans requests a reanalysis of all intersections to determine appropriate mitigation.

S1-04

If you have any questions or concerns, please feel free to contact me at (805) 549-3131 or adam.fukushima@dot.ca.gov.

Sincerely,

Adam Fukushima, PTP
Development Review
Caltrans District 5

Comment Letter S2

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence between the Bureau of Indian Affairs (BIA) and the California Department of Fish and Wildlife, South Coast Region regarding the end of the comment period on the EA.

Comment Letter S3

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence from the State Clearinghouse regarding comment letters received at the State Clearinghouse during the comment period on the EA.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years and not a party to this action. My business address is 831 State Street, Santa Barbara, California 93101. On October 4, 2013, I served the foregoing document described as **Comments on the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee-to-Trust Acquisition Project** on the interested parties in this action:

SEE ATTACHED SERVICE LIST

☒ **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I enclosed the document in a sealed envelope or package addressed to the person(s) at the address(es) above and placed the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Santa Barbara, California, in a sealed envelope with postage fully paid.

☐ **BY FACSIMILE:** The document(s) were served by facsimile. The facsimile transmission was without error and completed prior to 5:00 p.m. A copy of the transmission report is available upon request.

☐ **BY OVERNIGHT DELIVERY:** The document(s) were served by overnight delivery via FedEx. I enclosed the document in a sealed envelope or package addressed to the person(s) and the address(es) above and placed the envelope(s) for pick-up by FedEx. I am readily familiar with the firm's practice of collection and processing correspondence on the same day with this courier service, for overnight delivery.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **BY HAND DELIVERY:** The document(s) were delivered by hand during the normal course of business, during regular business hours.

☒ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☐ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 4, 2013, at Santa Barbara, California.

AM Balash

Anne Marie Balash

SERVICE LIST

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825
BY U.S. MAIL

Chad A. Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Regional Office
chad.broussard@bia.gov
BY E-MAIL

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

October 4, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825
Amy.Dutschke@bia.gov

Subject: Environmental Assessment for the Chumash Camp 4 Fee-to-Trust Project, SCH #2013084004, Santa Barbara County

Dear Ms. Dutschke:

The California Department of Fish and Wildlife (Department), has reviewed the Environmental Assessment (EA) for impacts to biological resources. The EA has been prepared for the United States (U.S.) Bureau of Indian Affairs (BIA) to support an application from the Santa Ynez Band of Chumash Indians (Tribe) for lands to be placed into federal trust. The lands proposed for trust acquisition are currently owned in fee by the Tribe and are known as the Camp 4 site. The proposed trust parcels/project site consists of approximately 1,411.1 acres located within an unincorporated area of Santa Barbara County (County), east of the Town of Santa Ynez, and 3.95 miles east of the City of Solvang. The proposed project includes assignment to Tribal members a total of 143 five-acre residential lots and access roadways (793 acres) for residential development. The remainder of the proposed project site would consist of 300 acres of agricultural vineyards (256 existing acres with 44 acres dedicated for expansion), 206 acres of open space/recreational, 98 acres of riparian corridor and 33 acres of oak woodland conservation as a protected resources management zones (RMZ), and 3 acres of Special Purpose Zone - Utilities. The proposed open space areas would be utilized for runoff control and would include the development of detention basins and vegetated swales. The proposed project site is zoned AG-II-100 (Agriculture, minimum 100-acre parcels) in the Santa Ynez Valley Community Plan (County of Santa Barbara, 2009). S4-01

The project site contains the vineyard operation, an operating horse stable, and a ranch house with a barn. The remainder of the project site is undeveloped pastureland consisting of rolling hills and elevated stream terraces used for cattle grazing. The project site is bordered on the north and east by agricultural land and rural residences, on the west by agricultural land and oak savannah, and on the south by oak savannah. Surrounding land uses consist of agricultural fields, low-density rural residences, and undeveloped pasture lands. S4-02

Habitat types described in the EA as occurring on the proposed project site include annual grassland (943.64 acres), blue oak (*Quercus douglasii*) savannah (158.77 acres), ephemeral drainages (6.85 acres), vernal pools (0.36 acres), and a seasonal wetland swale (0.10 acres). Wildlife with the potential to be impacted by the project includes the Federally Threatened and State Special Concern Species California red-legged frog (*Rana aurora draytonii*) and the Federally Threatened vernal pool fairy shrimp (*Branchinecta lynchi*).

The total wildlife habitat acreage estimated to be impacted by the proposed project would be 843.94 acres. Of that total, the wildlife habitat types described in the EA on the proposed project site estimated to be impacted by the project include 711.65 acres of annual grassland,

130.01 acres of blue oak savannah, 2.13 acres of ephemeral drainages, 0.05 acres of vernal pools, and 0.10 acres of a seasonal wetland swale. Proposed project impacts identified in the EA also include the removal of approximately 70 blue oak trees.

Measures proposed in the EA to mitigate impacts to biological resources include:

- an oak tree revegation plan that includes proposed planting locations within the project site and a five-year monitoring plan to ensure a no net loss of oak trees;
- construction activities that would occur within the vicinity of potentially jurisdictional waters of the U.S. restricted to the dry season (i.e., April 15 through October 15);
- implementation of protective measures to minimize impacts to California red-legged frog and vernal pool fairy shrimp, and;
- nesting bird surveys during construction from March 1 to September 15 and nesting bird protections to include construction buffers from active nests of 500 feet and tree removals restricted from March 1 to September 15.

S4-02 Cont.

State Trustee Agency

The fish and wildlife resources of the state of California are held in trust for the people of the state by the Department (Fish and Game Code Section 711.7(a)). The Department provides these recommendations as state trustee agency with jurisdiction over the conservation, protection and management of fish, wildlife, native plants, and habitat necessary for biologically viable populations of those species (Fish and Game Code Section 1802).

S4-03

Tree Removal

The EA proposes to mitigate the loss of blue oak trees by replacement at a ratio that ensures no net loss. The County of Santa Barbara recommends a deciduous oak tree replacement ratio of 15:1 (County of Santa Barbara Oak Tree Protection Program Final EIR, 00-EIR-07). This ratio takes into consideration the less than 100% long-term survival of replacement trees, but also mitigates for the habitat which is temporarily lost until the replacement trees reach functional maturity. The Department concurs with the recommendations in the County's Oak Tree Protection Program.

The success of replacement oak tree plantings would be optimized with a minimum spacing of 20 feet. Long-term survival would be maximized if trees were protected within the dripline and monitored and nurtured for a minimum of 5 years.

S4-04

Impacts to Nesting Birds

All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. §10.13). The EA proposes nesting bird surveys during construction from March 1 to September 15 and nesting bird protections to include tree removals restricted to outside the bird nesting season March 1 to September 15. Several raptor species, such as hawks, listed in the MBTA occur on the proposed project site. These species often begin nesting in February and as early as January. The Department recognizes raptor nesting season to be February 1 through September 15.

S4-05

Urban-Wildlife Interface

The proposed project site is located adjacent to large expanses of oak savannah and annual grassland wildlife habitats. The proposed project site and surrounding habitats support a variety of wildlife species (e.g., deer, mountain lion, hawks, etc.). The currently proposed residential development configuration will modify the urban-wildlife interface and create edge effects to surrounding habitats both on and off-site.

Examples of adverse edge effects include invasion by non-native plants and animals, chemical drift, displacement of wildlife by lighting and noise, nuisance water from summer irrigation, vehicle traffic, domestic pets, and other factors. Adverse edge effects can degrade natural habitats where they abut development and extend for many hundreds of feet beyond the development footprint.

During the development of the project configuration, the Tribe may consider the placement of RMZs in inactive or passive land-use areas, linkage development between the RMZs, and size maximization of the RMZs to the greatest extent feasible. These strategies will allow for animal movement and the exchange of plant and animal life throughout the RMZs.

S4-06

County-required fuel modification, which is designed to minimize the risk of wildfire to the proposed development, may result in addition edge effects and loss of habitats both within the project site and potentially extending offsite of the property. Fuel modifications typically involve mechanical removal or reduction of vegetation, and result in substantial degradation of wildlife habitat values associated with oak woodland and annual grasslands, even if individual oak trees or specific shrubs are retained. Fire safe building design and incorporating roadways into the fuel modification zones are technics to maintain and preserve natural habitat within the project footprint. The use of hand tools for fuel modification activities will minimize ground disturbance.

The invasion of non-native ants would be minimized if landscaping plants and their containers were inspected for ants prior to delivery to the project site, with the rejection of plants containing ants. A 300-foot-wide zone that includes non-irrigated native landscaping as a buffer between the development and the natural areas would avoid the introduction of the non-native Argentine ant in the natural open space areas and RMZs.

Proposed Alternatives

The Tribe considered eight alternative concept plans for development on the project site, in addition to the proposed project. All alternatives included a reduction in size for the 143 assigned lots from 5 acres to 1 acre, decreasing the residential acreage from approximately 793± acres to approximately 194± acres. An additional 30 acres of the project site would be reserved for approximately 80,000 square feet of tribal community facilities.

S4-07

One alternative (Alternative B) was chosen for detailed analysis in the EA, along with the no-project alternative. Alternative B would arrange 1-acre lots in three clusters in the northeastern, central, and south-central portions of the proposed project site. Alternative B would almost quadruple the amount of open space and recreation land uses, from 206 acres to 775 acres. The number of blue oak trees removed would be reduced to an estimated 50 trees. An additional alternative not analyzed in the EA (Concept Plan – Option J.0.1) would cluster all 1-acre assigned lots in the northeastern corner of the proposed project site.

The Department encourages the Tribe to retain its open space and maintain connectivity of the RMZs for wildlife resources. In addition, the Department is available to assist with or consult on strategies to maintain fish and wildlife resources within the project scope. S4-08

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter Senior Environmental Scientist (Specialist), at (805) 640-3677. S4-09

Sincerely,

Edmund Pert
Regional Manager
South Coast Region

References utilized:

Conservation Biology Institute, 2000. Review of potential edge effects on the San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*). Prepared for the Ahmanson Land Company. 43 pp.

Suarez, A.V., D.T. Bolger, and T.J. Case. 1998. Effects of fragmentation and invasion on native ant communities in coastal southern California. Ecology 79(8):2,041- 2,056.

ec: Ali Aghili, CDFW, Los Alamitos
Martin Potter, CDFW, Ojai
Natasha Lohmus, CDFW, Carpinteria
Mary Meyer, CDFW, Ojai
Betty Courtney, CDFW, Santa Clarita
Scott Morgan, State Clearinghouse, Sacramento

STATE OF CALIFORNIA — Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION	

August 21, 2013

RECEIVED
AUG 23 2013
STATE CLEARING HOUSE

Ms. Amy Dutschke, Regional Director
United States Department of the Interior
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Sent by U.S. Mail
No. of Pages: 2

2013081068

RE: NEPA document; **SCH#2013081068;** for the **"Environmental Assessment (EA) for the Camp 4 Fee-to-Trust Project of the Santa Ynez Band of Chumash Indians of California;"** located in Santa Barbara County, California

Dear Ms. Dutschke:

The California Native American Heritage Commission (NAHC) has reviewed the proposed action by the U.S. Department of the Interior, Bureau of Indian Affairs (BIA) and has no objections to it. The proposed land schedule for acquisition is within the ancestral area of the Santa Ynez Band of Chumash Indians. S5-01 S5-02

In the 1985 Appellate Court decision (170 Cal App 3rd 604), the Court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites. S5-03

If you have any questions or need additional information, please contact me at (916) 373-3715.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Comment Letter S6

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter S5.

Comment Letter S7

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence from the State Clearinghouse regarding comment letters received at the State Clearinghouse during the comment period on the EA.

Comment Letter S8

This comment letter is included **in Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence from the State Clearinghouse regarding comment letters received at the State Clearinghouse during the comment period on the EA.

LOCAL AGENCIES (L)

COMMENT LETTERS

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

RE: Notice of Availability - Environmental Assessment for Proposed Trust Acquisition

1 message

Wallar, Chandra <cwallar@co.santa-barbara.ca.us> Tue, Aug 27, 2013 at 4:55 PM
To: Chad Broussard <chad.broussard@bia.gov>

Thank you Chad

Chandra

From: Chad Broussard [mailto:chad.broussard@bia.gov]
Sent: Tuesday, August 27, 2013 4:49 PM
To: Wallar, Chandra
Subject: Re: Notice of Availability - Environmental Assessment for Proposed Trust Acquisition

Receipt confirmed. As we discussed, an email request is sufficient. We are considering your request and will get back to you ASAP.

From: Wallar, Chandra [mailto:cwallar@co.santa-barbara.ca.us]
Sent: Tuesday, August 27, 2013 04:42 PM
To: 'chad.broussard@BIA.gov' <chad.broussard@BIA.gov>
Cc: Marshall, Dennis <dmarshall@co.santa-barbara.ca.us>; Russell, Glenn <grussell@co.santa-barbara.ca.us>; Bahl, Renee <rbahl@co.santa-barbara.ca.us>
Subject: RE: Notice of Availability - Environmental Assessment for Proposed Trust Acquisition

Mr. Broussard, please confirm receipt of this email. It was my understanding you did not require a formal written, certified mail, mail. If this is not the case please advise and I will submit more formal request. As we discussed time is of the essence on this decision.

Regards,

Chandra Wallar

From: Wallar, Chandra
Sent: Monday, August 26, 2013 12:09 PM

To: 'chad.broussard@BIA.gov'
Cc: Marshall, Dennis; Russell, Glenn; Bahl, Renee
Subject: Notice of Availability - Environmental Assessment for Proposed Trust Acquisition

Mr. Broussard:

The County of Santa Barbara (County) requests a 30-day extension to the public comment deadline for the 'Environmental Assessment for Proposed Trust Acquisition of Five Parcels Known as the Camp 4 Property, Santa Ynez Band of Chumash Indians, Santa Barbara County, California' from September 19, 2013 to October 19, 2013. This request is based on the following grounds: L1-01

1. The County has numerous departments with specific functional expertise coordinating on review of this very large (930 pages including 14 technical appendices) and complex document. L1-02
2. The property in question represents over 5% of the total rural lands within the Santa Ynez Valley Community Plan Area and is thus a highly substantial proposed project within the context of the Santa Ynez Valley community. L1-03
3. Given its large contextual scope, the proposed project could have a substantial impact on the environment, local communities, local services, as well as various other land use implications. L1-04
4. We have previously requested the cultural resources technical appendix, which we think is of critical importance to our review. To date, we have not received a response from the Bureau on this request. L1-05

We hope to hear from you soon regarding the favorable response to our request. Please confirm receipt of this email.

Regards,

Chandra L. Wallar

County Executive Officer

County of Santa Barbara

Comment Letter L2

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely a request from Cathy Christian, Attorney for Santa Barbara County to receive notice of any information regarding the EA, the associated NEPA process, the associated fee-to-trust application, and the Tribal Consolidation Area (TCA).

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Notice of Availability - Environmental Assessment for Proposed Trust Acquisition of Five Parcels Known as the Camp 4 Property (1 of 5)

1 message

Van Wingerden, Cam <cvanwingerden@co.santa-barbara.ca.us> Mon, Oct 7, 2013 at 12:26 PM
To: "amy.dutschke@bia.gov" <amy.dutschke@bia.gov>
Cc: "chad.broussard@bia.gov" <chad.broussard@bia.gov>, "Sam Cohen (scohen@sybmi.org)" <scohen@sybmi.org>

Sent on behalf of Chandra L. Walker

Dear Ms. Dutschke:

Attached please find the subject correspondence and attachments. Due to the size of the documents, there will be three separate e-mails. L3-01

Thank you.

Cam Van Wingerden

Executive Secretary

County Executive Office

County of Santa Barbara

105 East Anapamu Street

Santa Barbara, CA 93101

805-568-3404

2 attachments

EA response Chumash Camp 4 FTT.pdf
726K

EA Comments_JR_RVM_100313.pdf
428K

County Of Santa Barbara

Chandra L. Wallar
County Executive Officer

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

Executive Office

October 7, 2013

Ms. Amy Dutschke, Regional Director
Bureau of Indian Affairs,
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

E-mail: amy.dutschke@bia.gov

Re: Notice of Availability – Environmental Assessment for Proposed Trust Acquisition of Five Parcels Known as the Camp 4 Property

Dear Ms. Dutschke:

Thank you for the opportunity to comment on the *Notice of Availability – Environmental Assessment for Proposed Trust Acquisition of Five Parcels Known as the Camp 4 Property*. Attached are comments reflecting concerns related to the inadequacy of the Environmental Assessment (EA) and the need for a complete assessment of all possible impacts via an Environmental Impact Statement (EIS). L3-01 Cont.

The County of Santa Barbara ("County") requests that the United States Department of the Interior, Bureau of Indian Affairs, ("BIA") prepare a complete Environmental Impact Statement for the Santa Ynez Band of Chumash Mission Indians' Camp 4 Fee-to-Trust Proposed Federal Action ("Camp 4"). The August 2013 Environmental Assessment is inadequate because there are substantial questions as to whether Camp 4 may cause significant environmental impacts. Since an Environmental Assessment is appropriate only "where no effect on the environment is possible," the National Environmental Policy Act ("NEPA") requires preparation of an Environmental Impact Statement. (Natural Resources Def. Council v. Duvall 777 F.Supp. 1533, 1538 (E.D. Cal. 1991.)) L3-02

Additionally it must be noted that the County has been hampered in preparing and delivering our response as a result of the October 1st shutdown of the federal government. We have been unable to contact BIA staff to get answers to specific questions and additional information necessary to adequately response to the EA. The County officially requests that the comment period be extended by the number of days of federal government shutdown. L3-03

Renée E. Bahl
Assistant County Executive Officer
rbahl@co.santa-barbara.ca.us

Terri Maus-Nisich
Assistant County Executive Officer
tmaus@countyofsb.org

Donna Bozanich
Assistant to the County Executive Officer
dbozanich@co.santa-barbara.ca.us

If you should have any questions or require additional information, please contact my office at (805)568-3404.

L3-03 Cont.

Sincerely,

Chandra L. Wallar

Chandra L. Wallar
County Executive Officer

cc: Santa Barbara County Board of Supervisors
Glenn Russell, Director, Planning and Development Department
Dennis Marshall, County Counsel
Sam Cohen, Government and Legal Specialist, Santa Ynez Band of Chumash Indians
Chad Broussard, Environmental Protection Specialist, BIA chad.broussard@bia.gov

Encl: County of Santa Barbara's Comments on the Environmental Assessment for Camp 4

TABLE OF CONTENTS

COUNTY OF SANTA BARBARA'S COMMENTS ON THE ENVIRONMENTAL ASSESSMENT FOR CAMP 4

INTRODUCTION

The County of Santa Barbara ("County") requests that the United States Department of the Interior, Bureau of Indian Affairs, ("BIA") prepare a complete Environmental Impact Statement for the Santa Ynez Band of Chumash Mission Indians' Camp 4 Fee-to-Trust Proposed Federal Action ("Camp 4"). The August 2013 Environmental Assessment is inadequate because there are substantial questions as to whether Camp 4 may cause significant environmental impacts. Since an Environmental Assessment is appropriate only "where no effect on the environment is possible," the National Environmental Policy Act ("NEPA") requires preparation of an Environmental Impact Statement. (*Natural Resources Def. Council v. Duvall* 777 F.Supp. 1533, 1538 (E.D. Cal. 1991.))

L3-04

BACKGROUND ON PROPOSED FEDERAL ACTION: CAMP 4

In March 2013, the Santa Ynez Band of Chumash Mission Indians ("Tribe") submitted the Proposed Tribal Consolidation and Acquisition Plan ("Consolidation Plan") to the BIA. The Consolidation Plan includes approximately 11,500 acres of the Santa Ynez Valley, including Camp 4. (EA p. 1-6.) The BIA approved the Consolidation Plan on June 17, 2013.

L3-05

In July 2013, the Tribe submitted an Application for Transfer of Title for Fee Lands into Trust for Camp 4. Camp 4 is 1,433 acres located in the middle of the Santa Ynez Valley in Santa Barbara County, California, directly off of State Highway 154 between Baseline Avenue and Armour Ranch Road. The 1,433 acres includes 21.9 acres of rights-of-way. The property is zoned exclusively for agriculture. The project proposes 143 residential dwellings ranging from

L3-06

3,000 to 5,000 square feet as well as an on-site wastewater treatment plant, roads, and other infrastructure on a largely pristine set of parcels that are home to an intact, self-sustaining oak woodland and active agriculture. (EA p. 2-14.)

The Tribe currently has an approximately 138-acre Reservation located on the south side of highway 246 in the Santa Ynez Valley, approximately 1.6 miles west of the intersection of highways 246 and 154. Of the 138 acres, at least 26 acres currently has residential capacity, and 16 acres has economic development capacity. (EA p. 1-6.) The Tribe has 136 tribal members and approximately 1,300 lineal descendants. The stated purpose of Camp 4 is to provide housing for tribal members because the current Reservation is claimed to be insufficient in size. Camp 4 is located 1.75 miles from the Tribe's Reservation and does not have any shared boundaries with the Reservation.

L3-06 Cont.

Camp 4 is under an existing Williamson Act Contract which is a 10-year rolling contract. The property has been preserved for agricultural use by a Williamson Act Contract since at least 1971. In August 2013, the Tribe submitted an application for non-renewal, meaning the contract will expire in December 31, 2022. On July 1, 2013, the Tribe passed Resolution 931 which requires compliance with the existing Williamson Act contract until the contract expires. (EA p. 4-22.)

In August 2013, the BIA released an Environmental Assessment for public review and comment. The Environmental Assessment identifies two Alternatives. Alternative A consists of 1,433 acres to be converted to 143 five-acre residential lots. A total of 793 acres would be covered by residential homes and transportation infrastructure. The project site would also include 300 acres of vineyards (256 existing and 44 acres dedicated for expansion), 206 acres of

open space/recreational, 98 acres of riparian corridor and 33 acres of oak woodland conservation and 3 acres of Special Purpose Zone for utilities.

Alternative B consists of 143 one-acre residential lots for tribal members. The residential lots and roadways would cover approximately 194 acres of the project site. The project site would include 775 acres of open space/recreational use and 30 acres of Tribal Facilties and the same acreages of vineyard, riparian corridor and oak woodland conservation, and utilities. (EA p. 2-3.) The Tribal Facilities include a Community Center with a Banquet Hall/Exhibition Facility, an office complex and tribal community space. (EA p. 2-13, 2-14.) The Community Center proposes 100 special events per year with potentially up to 1000 attendees at each of the special events. This equates to events two nights a week, with an increase of 2000 visitors to the Valley each week. (EA p. 2-12; Appendix C, p. 3-1.)

L3-06 Cont.

Comments were due on September 19, 2013, but the County requested an extension of time to comment. The BIA granted the County's request and extended the comment period to October 7, 2013. The Environmental Assessment was reviewed by operational County Departments including Planning and Development ("P & D"), Santa Barbara County Fire District ("Fire" or "County Fire"), Santa Barbara County Sheriff ("Sheriff"), Public Works ("PW"), Agricultural Commissioner's Office, Assessor, and the County Executive Office ("CEO"). The Discussion section below incorporates all of the comments and expertise of those Departments and cites to a primary source department as appropriate.

L3-07

L3-08

DISCUSSION

An Environmental Impact Statement must be prepared. The August 2013 Environmental Assessment is inadequate because it fails to take the require "hard look" at potential significant impacts, fails to disclose all project components, uses an inaccurate baseline, contains inadequate mitigation, incorrectly describes Camp 4 as an "On-Reservation" acquisition request, and provides insufficient discussion and analysis of alternatives.

Camp 4 is substantial in size, scope, and may have significant environmental impacts on land use, agriculture, public services including fire and sheriff, water resources, biology, air quality, traffic, and visual resources. Camp 4 is inconsistent with land use regulations including the County Comprehensive Plan, Santa Ynez Valley Community Plan, the Williamson Act and the County Uniform Rules, County zoning ordinance, and County codes including Agricultural Buffer and Grading. The project would remove land from the County's jurisdiction and reduce tax revenues necessary to provide public services. L3-09

An Environmental Impact Statement is necessary to do the following:

- Disclose all project components and correct a number of factual errors;
- Establish a clear and accurate baseline from which to analyze potential environmental impacts;
- Analyze all potentially significant direct and cumulative impacts;
- Require substantial measures to mitigate or avoid all potential significant impacts; and,
- Evaluate a full range of alternatives.

Without an Environmental Impact Statement that provides the correct information, neither the BIA nor the public can make a proper, informed evaluation of the environmental impacts of Camp 4.

I. AN ENVIRONMENTAL IMPACT STATEMENT IS NECESSARY BECAUSE THE ENVIRONMENTAL ASSESSMENT FAILS TO DISCLOSE MAJOR COMPONENTS OF THE PROPOSED FEDERAL ACTION.

An Environmental Impact Statement is necessary to disclose and analyze the reasonably foreseeable uses of Camp 4 including level of residential development and the proposed Tribal Facilities. NEPA requires the study of what is "reasonably foreseeable" from the proposed action. Agencies conducting NEPA review must also consider the indirect effects of the proposed project – i.e. effects caused by the agency action that are later in time or farther removed in distance, but are still reasonably foreseeable. (*Center for Environmental Law and Policy* v. *US Bureau of Reclamation* (9th Cir. 2011) 655 F.3d 1000, 1011.) The Camp 4 project description is not adequate because it fails to disclose components of Camp 4 that are vital to evaluating the impacts and what is reasonably foreseeable.

L3-09 Cont.

Camp 4 includes 1,433 acres but 21.9 acres are rights-of-ways, and the Environmental Assessment does not adequately address County ownership of those rights-of-way. To establish County ownership of the rights-of-way, chain of title research must be conducted. In the short time frame available for comment on the Environmental Assessment, the County did not have adequate time to complete this research. If, however, the research shows that the County owns the rights-of-way, then the 21.9 acres of rights-of way cannot be taken into trust and the

L3-10

Environmental Impact Statement will need to be revised to reflect that. (*County of Amador v. City of Plymouth*, 149 Cal. App. 4th 1089, 1100-1101 (Cal. App. 3d Dist. 2007)

L3-10 Cont.

In addition, both Alternatives A & B mention the development of one single-family dwelling per proposed residential lot, but do not indicate whether additional residential development would be constructed. Without this information, it is not possible to estimate the increase in future residents or to adequately identify potential impacts. In addition, the project description fails to fully explain the proposed Tribal Facilities, making it impossible to accurately evaluate the proposed impacts from the increase in employees, increase in visitors and large commercial structural development in an agricultural setting.

A. Residential Development

Camp 4 proposes 143 new residential lots. The project description is unclear whether the project includes 143 single-family homes or 143 multi-family homes and unclear whether residential structures include any accessory structures. (EA p. 2-4.) Potential accessory structures on the lots include a residential second unit, agricultural structures, and residential accessory structures, greenhouses under 300 square feet, or an artist studio or guesthouse. (P&D.) Additionally, for Alternative A, the lots would also be able to apply for approval of a farm employee dwelling in addition to the above structures. (P&D.)

L3-11

All of these components dictate the number of new residents that will be accessing the site and that will be in need of public services. Without adequate detail of the residential development, the BIA and the public cannot analyze or fully evaluate the potential impacts of Camp 4.

B. Tribal Facilities

The BIA's NEPA Handbook states at page 16, section 4.4(D), that "[t]he discussion of the proposed action should clearly answer the questions: Who? What? Where? and When?" The Environmental Assessment does not answer these questions for the proposed conference center. The Environmental Assessment states that there will be 100 events per year, and in the Appendix C Wastewater study, estimates the attendees to be 1,000 people per event. (EA p. 2-12; Appendix C, p. 3-1.) It is unclear if the 1,000 people per event is part of the project description or an estimate used only for wastewater analysis; however, it is clear that this estimate is not used throughout the Environmental Assessment to evaluate potential impacts of the influx of visitors to the Santa Ynez Valley two days per week, all year long. The Environmental Assessment lacks details such as the timing of the events, day or night, how often the events are open to the public, how large each event will be, and what types of events are anticipated. (EA p. 2-12.) All of these details impact the evaluation of such things as increases in traffic, need for public services, night lighting, impacts to on-site agricultural uses, impacts to surrounding agricultural and rural residential uses, noise and compatibility with land use plans. (EA pp. 4-46; 4-44.)

L3-11 Cont.

II. THE ENVIRONMENTAL ASSESSMENT BASELINE IMPROPERLY ASSUMES THAT NO NEW PEOPLE WILL MOVE TO THE VALLEY.

The Environmental Assessment has a flawed baseline because it improperly assumes that there will be no increase in residents to the Santa Ynez Valley. The flawed logic is that the tribal members that will move into Camp 4 already live in the Santa Ynez Valley so there will be no increase. However, even if that is accurate, as the tribal members vacate their current

L3-12

residential accommodations, new residents will move to the Santa Ynez Valley to occupy the newly vacant residential units. This incorrect baseline assumption leads to false and unsupported conclusions for multiple impact areas, including Traffic, Air Quality and Public Services including Fire, Sheriff, Solid Waste, Schools, Parks and Recreation. (EA pp. 4-25; 4-47; 4-26; 4-47; 4-46; 4-24.)

The stated purpose of Camp 4 is to provide "housing within the Tribal Consolidation Area to accommodate the Tribe's current members and anticipated growth" and "all current land assignments on the existing Reservation shall continue to be maintained unchanged as it is difficult to cancel any existing land assignment on the Reservation." (EA p. 1-6, emphasis added.) Yet, the Environmental Assessment concludes that minimal impacts will occur in a number of areas because people moving into the houses already live in the area. The Environmental Assessment fails to take the required "hard look" at the fact that this project will construct 143 new homes bringing new residents to the area and potentially construct a Banquet Hall/Exhibition Facility that will both employ people and bring large numbers of visitors to the area for events.

L3-12 Cont.

III. AN ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED BECAUSE THERE ARE SUBSTANTIAL QUESTIONS THAT CAMP 4 MAY CAUSE A SIGNIFICANT IMPACT TO LAND USE, AGRICULTURE, PUBLIC SERVICES, WATER RESOURCES, BIOLOGY, AIR QUALITY, TRAFFIC, AND VISUAL RESOURCES.

L3-13

NEPA requires the BIA to take a "hard look" at the environmental consequences of Camp 4. (*Robertson v. Methow Valley Citizens Council* 490 U.S. 322, 350, 109 S.Ct. 1835

(1989).) An Environmental Assessment in only appropriate "in those obvious circumstances where no effect on the environment is possible." (*Natural Resources Def. Council v. Duvall* 777 F.Supp. 1533, 1538 (E.D. Cal. 1991) emphasis added.) As discussed below, Camp 4 has the potential to cause many significant impacts to the environment. Thus, NEPA requires the BIA to prepare an Environmental Impact Statement because there are substantial questions about whether Camp 4 may have a significant effect on the environment. (*Greenpeace Action v. Franklin* (9th Cir. 1992) 14 F.3d 1324; *Blue Mountain Biodiversity Project v. Blackwood* (9th Cir. 1998) 161 F.3d 1208.

L3-13 Cont.

A. Land Use and Agriculture

The Land Use section of the Environmental Assessment is fatally flawed because it fails to take the required "hard look" at the following:

L3-14

- Agricultural Resources, including existing grazing operations;
- Applicable policies of the County Comprehensive Plan and Santa Ynez Community Plan;
- Camp 4's inconsistency with the Williamson Act, County Uniform Rules, and the Tribe's Williamson Act Contract which does not expire until 2023; and,
- County zoning, agricultural buffer and grading ordinance.

L3-15

L3-16

L3-17

1. Agriculture

The 2012 Santa Barbara County Agricultural Production Report indicated gross farm production to be $1.3 billion. Agriculture is the leading contributor to the County's economy and has a positive local impact to the County through the multiplier effect in excess of $2.5 billion. (P&D.) Despite the importance and necessity of protecting agriculture in the County, there is no mention of agriculture in the entire Land Resources section. (EA p. 4-1 – 4-3.) The

L3-18

brief discussion of agriculture in the Land Use section addresses the impact from the perspective of compliance with local land use plans, rather than the direct impact to existing on-site and neighboring off-site operations. The Environmental Assessment contains inaccurate statements and flawed conclusions and completely fails to address the impact of Camp 4 on Agricultural Resources, including existing grazing operations. Thus, an Environmental Impact Statement is necessary.

2. Conversion of Agricultural Land

Camp 4 and both Alternatives will result in the conversion of prime agricultural farmland acreage to a residential subdivision. Both project alternatives will convert large amounts of farmland acreage (793 or 194 acres), that will result in a significant unavoidable impact. In particular, Alternative B's 1-acre sites constitutes the "urbanization" of an existing agricultural area. (County Comprehensive Plan, Land Use Element p. 148.) The Environmental Assessment states additional acreage (206 or 775 acres), is proposed to be used as Open Space/Recreational Area. The conversion of the acreage to Open Space/Recreational Area will add to the loss of farmland acreage to a total of 999 or 969 acres. (EA pp. 2-3, 3-56 – 3-63.) There is no mention of the historical or current cattle grazing operation on the project site that will be totally eliminated. Any loss of prime farmland is a significiant impact that cannot be mitigated.

L3-18 Cont.

3. On-site Grazing Operations

Of the 1433 acres of Camp 4, 704 acres have historic and current primary use as a grazing operation. Grazing operations are agriculture, and the Environmental Assessment fails to recognize this fact. As a result of this flawed baseline, the Environmental Assessment

incorrectly concludes that Camp 4 and both Alternatives will not impact on-site agricultural operations. (EA p. 4-20.)

The project proposes most of the development on existing grazing land yet there is no description of the cattle grazing operation or analysis of impact resulting from the conversion of 704 acres of grazing land. There are multiple inconsistent statements in the EA regarding impacts to agriculture: for example, the EA states:

- "With the implementation of Alternative A, land currently being used for agricultural production will continue to operate and will not experience a change in land use" (EA p. 4-20.);
- "Alternative A would impact approximately 704 acres of the total 1,041.1 acres of grazing land" (EA p. 4-20.);
- "This land is non-prime farmland and is not currently being used for agricultural purposes therefore, impact to agricultural on these parcels would be minimal". (EA p. 4-22.); and,
- "The current agricultural and grazing land uses would be maintained on these parcels with the exception of three acres on Parcel 1 which would be developed into a wastewater treatment plan (WWTP)." (EA p. 4-1.)

L3-18 Cont.

These statements are inconsistent because the cattle grazing operation is agricultural production, and the proposal is to convert all of it to residential uses and non-grazing land uses. Because the majority of the existing agricultural operation is grazing and the Environmental Assessment dismisses grazing as agricultural use of the land, the Environmental Assessment grossly underestimates the impacts. (EA Figure 4-1.)

The Environmental Assessment's failure to recognize grazing operations is further exacerbated by the reliance on the Farmland Conversion Impact Rating system (Form AD-1006). The completed form is provided, however, there are no instructions showing how the points are assigned and the public cannot assess whether the analysis is accurate. (EA, Appendix G.) Based on County Planning staff's research, it appears the Farmland Conversion Impact Rating system does not include grazing land in the assessment because the definition of "Farmland" only includes Prime Farmland, and Farmland of Statewide, Unique or Local Importance, which includes the vineyard. Grazing lands are not considered "farmland" according to the model. This flaw is illustrated in Part VI, Percent of Site Being Farmed (Factor #3) of the Form. Only 1 of 20 points was assigned to each of the sites. The Environmental Assessment should fully assess impacts to the onsite grazing operation as a result of the project through a rangeland study or other analysis that uses a threshold of significance such as the number of animal units that the land can support.

L3-18 Cont.

4. Off-site Agricultural Operations

The Environmental Assessment fails to analyze whether Camp 4 is compatible with the adjacent properties to the southeast, south, and west. Camp 4's proposed high density residential development in the middle of an exclusively agricultural community and a potential Banquet Hall/Exhibition Facility in Alternative B are not compatible with agriculture. (P&D)

L3-19

Camp 4 would create the potential of impacts to neighboring agricultural production such as trespassing, vandalism, nuisance complaints, and decreased farming potential. Fencing to deter trespassers is costly and may hinder the movement of equipment and crops out of fields.

The close proximity of a residential development to agricultural operations will require special management practices and may result in loss of crop productivity and add additional time, cost, and labor to agricultural production.

Additionally, the Environmental Assessment does not analyze the potential impacts to agriculture as a result of the proposed Open Space/Recreation Zone. (P&D) Open Space/Recreational Areas provide a potential segway for the public to access adjacent agricultural areas, which may be likely to lead to trespassing, theft, littering, grass fires, and vandalism. County staff reports that with easy access farm equipment that is not locked while not in use and may become a target for theft and vandalism. (P&D) The high value of recycled metal has resulted in an increase in the number of cases of sprinklers and copper wiring being stolen. According to Planning and Development staff, one grower in Santa Maria had over 80 sprinkler heads stolen from his field overnight. (P&D)

L3-19 Cont.

The Banquet Hall/Exhibition Facility would likely cause significant impacts to the surrounding agriculture. The increases in traffic, noise, and proximity of attendees at special events would necessitate changes to the surrounding agricultural operations and should be analyzed more extensively in an Environmental Impact Statement.

5. County Comprehensive Plan and Santa Ynez Valley Community Plan

The County Comprehensive Plan, including the Santa Ynez Valley Community Plan (SYVCP), governs appropriate land use types and densities within the inland Rural Area. The proposed plan for the Camp 4 property greatly exceeds allowable uses and densities currently allowed for in the area and is inconsistent with the County's land use plans. Despite that the

County has a community plan specifically for the Santa Ynez Valley as well as many County-wide agricultural policies, the Environmental Assessment fails to consider any County Comprehensive Plan policies. The Santa Ynez Community Plan is attached as Exhibit A.

The EA states, "Adverse impact of land use would result if an incompatible land use within Alternative A would result in the inability of the County to continue to implement existing land use policies. In addition, adverse impacts to land use would result if the implementation of Alternative A resulted in the conversion of a significant percentage of county designated prime agricultural lands or other protected agricultural lands." (EA p. 4-19.) This statement sets a threshold of significance for land use impacts, and in applying this threshold, it is clear that Camp 4 will have significant impacts to land use. If Camp 4 moves forward, the County will be unable to apply Comprehensive Plan policies and land use plans to the site because the County will lose land use jurisdiction, and as discussed above, the project will result in a conversion of a significant percentage of agricultural grazing land.

L3-19 Cont.

Camp 4 conflicts with numerous Comprehensive Plan policies including the following:

- *GOAL LUA-SYV: Protect and Support Agricultural Land Use and Encourage Appropriate Agricultural Expansion.*
- *Policy LUA-SYV-2: Land designated for agriculture within the Santa Ynez Valley shall be preserved and protected for agricultural use.*
- *Policy LUA-SYV-3: New development shall be compatible with adjacent agricultural lands.*

- *Policy LUG-SYV-3: The urban boundary line surrounding the townships of Santa Ynez, Los Olivos and Ballard shall distinguish principally urban land uses from rural and/or agricultural uses. These boundaries shall represent the maximum extent of urban area in the Santa Ynez Valley. These boundaries shall not be moved except as part of a County-initiated update of the Plan.* (Santa Ynez Community Plan)

L3-19 Cont.

Camp 4 proposes significant residential development of a higher density than anticipated by the Comprehensive Plan in a rural area. Other nearby small lot subdivisions that exist outside the urban area were developed prior to the adoption of the Comprehensive Plan. The proposed Alternatives A & B propose five-acre and one-acre residential lots, respectively. This contravenes rural area policy countywide, including the Santa Ynez Valley Community Plan.

6. Williamson Act, Uniform Rules and the Tribe's Williamson Act Contract

The Environmental Assessment dismisses Camp 4's inconsistency with the Williamson Act, the County's Uniform Rules, and the Tribe's existing Williamson Act Contract as less than significant. However, the Environmental Assessment misstates the requirements of the Williamson Act, does not address the County's Uniform Rules which implement the Williamson Act, and provides conflicting information about the Tribe's compliance with the existing Williamson Act Contract.

L3-20

The Williamson Act enables the County to enter into a contract to restrict the Camp 4 parcels to agricultural use. (Gov. Code § 51200 et. seq.) In return, the Tribe and previous landowners receive property tax assessments which are much lower than fair market value because they are based upon farming. The Camp 4 parcels have been subject to a Williamson

Act Contract since 1971. Under the County Uniform Rules, all land under contract must be in agricultural production except for 2 acres, wherein all non-agricultural use must occur including all residential and personal use. (Uniform Rule 1-4.1.)

The Tribe has applied for non-renewal of their contract, but the contract has a 10 year rolling term and is not set to expire until 2023. The Environmental Assessment states that the property would comply with the Williamson Act contracts until they expire in 2023. (EA p. 4-22.) As evidence of this, the Environmental Assessment states that in July 2013, the Tribe passed a Resolution requiring compliance with the existing Williamson Act Contract. (EA p. 4-22.) However, the construction date for the project is projected to be 2014, completely in conflict with the Williamson Act and the Tribe's existing contract. (EA p. 2-9.) Camp 4 and both Alternatives are not consistent with the Williamson Act or the local Uniform Rules because they fail the 2-acre minimum for non-agricultural development, including the 143 residential units and the Tribal Facilities. Any construction of Camp 4 would be in violation of the Williamson Act contract and Uniform Rules.

L3-20 Cont.

7. County Codes (Zoning, Agricultural Buffer, and Grading)

Camp 4 is inconsistent with current Agricultural zoning, the County zoning ordinance, and other County Codes such as the Agricultural Buffer and Grading ordinances. The proposed Camp 4 plan greatly exceeds the allowable uses and densities for the area. The land use designation of the property is Agricultural Commercial (AC) and the Zone is Agriculture II, 100 acres minimum lot size. The maximum theoretical subdivision/development potential for the property, after expiration of the Williamson Act contract, is 14 lots with 14 main residences, which could only be realized if environmental review indicated such development was

L3-21

appropriate when considering the carrying capacity of the land and the suitability and productivity of the resultant parcels could sustain agriculture. (P&D) An increase from 14 lots to the proposed 143 lots in substantial increase and should be analyzed more thoroughly.

L3-21 Cont.

The Environmental Assessment completely fails to analyze Camp 4's impact on night and outdoor lighting which is regulated by the County zoning ordinance. County's Outdoor Lighting Regulations for the Santa Ynez Valley Community Plan Area contains requirements that "minimize light pollution, glare and light trespass" and preserve the night sky. (County Land Use and Development Code section 35.30.120.) Camp 4's residential proposal as well as the potential Banquet Hall/Exhibition Facility will likely cause substantial light pollution and interfere with the night sky throughout the Santa Ynez Valley. These impacts should be analyzed in an Environmental Impact Statement.

L3-22

The Environmental Assessment also incorrectly states that that Residential Agricultural Units are allowed on agricultural land. However, the ordinance permitting Residential Agricultural Units expired on July 6, 2008 and is no longer an option for landowners. (EA p. 3-59.)

L3-23

The Environmental Assessment claims the proposed housing development would be similar in nature to existing low density, rural residential development but does not address the fact that rural residential development on surrounding parcels is on larger parcels. Adjacent rural residential lots to the east are 5 acres in size and adjacent rural residential lots to the north are a mixture of 5, 10, and 20 acres in size. (EA p. 4-31.) There are no lots less than 5 acres in

L3-24

the area. The proposed 1- acre lots in Alternative B, as well as the Banquet Hall/Exhibition Facility are in no way compatible with the existing land uses.

Proposed residential uses adjacent to farmland do not include agricultural buffers and are not sited to minimize potential land use conflicts. (P&D.) County's Agricultural Buffer ordinance requires a 100-300 foot buffer between the incompatible residential or commercial uses and the property line of the agricultural parcel. (P&D; County Land Use and Development Code § 35.30.025.) The Environmental Assessment fails to analyze the increased pest risk and threat to crops from insects, diseases, and weeds spreading from residential uses that would no longer be regulated by the Agricultural Buffer ordinance. (P&D.) Buffer zones that are created to mitigate complaints about farming operations can result in a reservoir of pests if not adequately maintained. (P&D.) Noxious weeds and harmful insects and diseases can spread into adjoining agricultural fields and lead to crop losses or an increased use of pesticides. (P&D.) The Environmental Assessment dos not address how the public safety benefits of the California pesticide regulatory program – which protects people and the environment from unsafe pesticide use – would be accomplished if the land is taken into trust. Additionally, agricultural/residential conflicts create a financial drain on public agencies due to the amount of time spent investigating associated complaints and it is unclear who will deal with those complaints if taken into trust. (P&D)

L3-24 Cont.

Camp 4's proposed grading, including all cut and fill, should be completely explained. Alternative A says the total amount of cut is 180,000 cubic yards and the total amount of fill is 190,000 cubic yards, therefore 10,000 cubic yards of fill would be sourced from the proposed

L3-25

on-site drainage basins. (EA p. 4-2.) The total amount of cut should include the cut necessary to construct the drainage basins. Similarly, Alternative B says the total amount of cut is 75,000 cubic yards and the total amount of fill is 160,000 cubic yards, therefore 75,000 cubic yards of fill would be sourced from the proposed on-site drainage basins. (EA p. 4-2.) The total amount of cut should include the cut necessary to construct the drainage basins. Additionally, it is unclear how Alternative B, which has smaller drainage basins can produce the larger amount of fill material necessary for construction.

L3-25 Cont.

B. Public Services

The Environmental Assessment fails to take the required "hard look" at Camp 4's impact on public services. There are substantial questions that Camp 4 may cause a significant impact on Fire, emergency medical services, Sheriff, solid waste, schools, and parks and recreation. Thus, a complete Environmental Impact Statement is required.

L3-26

1. Fire Protection and Emergency Medical Services

The Environmental Assessment's analysis of the impact of the project on fire protection services is inadequate because it is incorrect in several important aspects and fails to evaluate a number of issues including an increase in need for services and an increase in the number of residents in the valley both permanent and temporary for special events which impacts the firefighter ratio. Because the project's increase in population and infrastructure would increase call load and thus increase the possibility that emergency responders will be committed to an incident when another emergency occurs, both Alternatives have a significant impact on the

L3-27

delivery of emergency fire and medical services provided by the Santa Barbara County Fire Department ("County Fire").

First, the Environmental Assessment errs in stating that County Fire will provide structural fire protection services to the project site. (EA p. 2-7.) If the project moves forward and Camp 4 is taken into trust, it would no longer be located in the Santa Barbara County Fire Protection District, and County Fire would not have jurisdictional or response authority. There is currently no agreement in place giving County Fire permission to access the Reservation or tribal trust land for emergency response or fire prevention purposes. Because the County would no longer be able to collect taxes on the project site and due to the project's size and potential negative impact on response resources and County revenues, the historical response services provided to Camp 4 parcels in emergencies would need to be reevaluated.

L3-27 Cont.

Second, the Environmental Assessment incorrectly states that wildland fire protection for the project would be primarily served by County Fire through an existing service agreement with California Department of Forestry and Fire Protection ("CAL FIRE"). (EA p. 4-25.) Although County Fire contracts with CAL FIRE to protect State Responsibility Areas ("SRA"), the California Master Cooperative Wildland Fire Management and Stafford Act Response Agreement *specifically prohibits* County Fire from assuming CAL FIRE's role of assisting federal agencies such as the BIA. (Fire.) The Environmental Assessment fails to consider that the Tribe would need to establish a separate local agreement with County Fire to provide wildland fire protection to the project site. (Fire.)

Third, the Environmental Assessment falsely states that the County Fire employs a firefighter-to-population ratio and a response time standard (EA p. 3-66); whereas, the County

Fire in fact uses a more prescriptive method from the Center for Public Safety Excellence as the basis to determine Standards of Cover. (Fire.) Moreover, the response time standard in the Environmental Assessment does not apply to the project site due to the distances involved and because the Santa Ynez Valley is not an urban area. (Fire.) An Environmental Impact Statement is necessary to fully evaluate the current level of fire protection services in the Santa Ynez Valley and whether capacity exists to serve the project site.

Fourth, the Environmental Assessment acknowledges that the use of the site for residential purposes could create additional demand for fire protection and would require more frequent responses from local firefighters, but makes no attempt to quantify that increase or determine if the increased need is significant. (EA p. 4-25.) Also, the Environmental Assessment says the fire trucks operated by County Fire in the vicinity of the project site can typically handle small structural fires such as residential fires, but does not address whether the fire trucks have the ability to serve the much larger, potentially multi-story, and unique to the Santa Ynez Valley Banquet Hall/Exhibition Facility. (EA p. 3-66.) Although the Environmental Assessment makes reference to stored water and a water system meeting residential demand, the Environmental Assessment does not address the fire protection capabilities of the water supply system or the details of the system. (Fire.) Additionally, it is unclear whether the suppression system meets the fire flow requirements for the Banquet Hall /Exhibition Facility, the most demanding structure in the development. (Fire.)

L3-27 Cont.

Additionally, the Environmental Assessment makes the faulty assumption that because a majority of the project's expected future residents currently live in the Santa Ynez Valley, no significant adverse impact of emergency calls to 911 would occur. (EA p. 4-25.) Regardless of

where the future residents of the project site may relocate from, the purpose of the project is to "provide *new* tribal housing" (EA p. 1-1 (emphasis added)), not *replacement* tribal housing and the EA must consider all impacts related to the project's creation of 143 new residential units, and potentially a Banquet Hall /Exhibition Facility, in the Santa Ynez Valley without considering where future residents will be relocating from. It is logical to assume that as tribal members move into Camp 4, new residents will move into the members' existing housing. Either way, there will be an increase in residents to the Santa Ynez Valley.

Finally, County Fire recommends the Tribe adopt the Santa Barbara County Fire Code or at the very least the California Fire Code to address specific local needs. The International Fire Code ("IFC") is merely a model code and suggested template for jurisdictions to use when determining what standards are necessary to serve their unique needs and the California State Fire Marshall's Office adopts certain applicable sections of the IFC along with many other referenced documents to form the California Fire Code ("CFC"). The Santa Barbara County Fire Code consists of the CFC as well as additional requirements designed to address specific local needs. Examples of more restrictive Santa Barbara County Fire Code requirements include those related to: automatic sprinkler systems; fire protection water supplies; fire apparatus access roads; photovoltaic systems; prohibition of fireworks; and defensible space.

L3-27 Cont.

The Environmental Assessment should, at minimum, require compliance with National Fire Protection Association Standards, fire flow requirements in Appendix BB of the 2013 California Fire Code, fire hydrant flow rates and spacing based on the Santa Barbara County Fire Department Development Standard #2, meet Santa Barbara County Fire Department Development Standard #3 regarding Stored Water Fire Protection Systems, the defensible

space/vegetation management requirements of California Public Resources Code 4291, that interior roadways follow Santa Barbara County Fire Department Development Standard #1, and that all fire protection sprinkler systems comply with National Fire Protection Association Standard 13. (Fire.)

L3-27 Cont.

2. Law Enforcement

The Environmental Assessment discusses whether calls for service from the project would be "disproportionate" to other residential or commercial development in the County, but fails to discuss the actual consideration – whether the project will *increase* the need for law enforcement services (EA p. 4-46.) and thus fails to take the required "hard look" at Camp 4's impact on law enforcement services.

As with the fire protection analysis, the Environmental Assessment makes the faulty assumption that because future residents are expected to relocate from existing housing in the Santa Ynez Valley, no significant adverse impact to law enforcement would occur. (EA p. 4-24.) Regardless of where the future residents of the project site may relocate from, the purpose of the project is to "provide *new* tribal housing" (EA p. 1-1 (emphasis added)), not *replacement* tribal housing. The Environmental Assessment must consider all impacts related to the project's creation of 143 new residential units, and potentially a Banquet Hall/Exhibition Facility, in the Santa Ynez Valley without considering where future residents will be relocating from.

L3-28

The Environmental Assessment is incorrect that County Fire provides search and rescue assistance for incidents in the Santa Ynez Valley (EA p. 3-65) or that the Santa Barbara County Emergency Medical Services Agency is the local 911 dispatch provider (EA p. 3-67); both services are provided by the Sheriff's Office. (Sheriff.)

To ensure that events do not interfere with roadway operations, the Environmental Assessment includes a mitigation measure requiring that the Tribe contract with CHP for speed enforcement, lane closures, traffic breaks, and queuing control (EA p. 4-46); however, there is no consideration of the potential need for additional law enforcement services to serve the needs of the event itself, and the EA fails to consider that law enforcement services for events at the Banquet Hall/Exhibition Facility would need to be provided through a specific contract for services for each event. (Sheriff.) Because the specific uses of the Banquet Hall/Exhibition Facility are so poorly defined by the EA, the Sheriff's Office is unable to determine whether a significant amount of law enforcement services would be needed to serve the project and the public because of the project. (Sheriff.)

L3-28 Cont.

3. Solid Waste

The Environmental Assessment fails to accurately describe the existing State requirements regarding waste diversion, the ability of the Tajiguas Sanitary Landfill to accept additional solid waste, or the total solid waste expected to be generated by Camp 4; therefore, an EIS is necessary to correct these errors and adequately analyze the impact of the project's generation of solid waste on the environment.

L3-29

Among other errors, the Environmental Assessment incorrectly states throughout the document that the management of non-hazardous solid waste in the County is prescribed by AB 939, when in fact the Environmental Assessment should refer to and consider the more recently adopted AB 341, which requires the diversion of 75% of total waste stream from landfill disposal by 2020. (EA p. 3-64; PW.) Additionally, the existing diversion rate should be included as a benchmark to analyze the impact of the project. The Environmental Assessment

also incorrectly states that the daily average intake at the Tajiguas Sanitary Landfill is 650 tons per day, when it is actually 796 tons per day, and that the Tajiguas Sanitary Landfill is estimated to reach its capacity in 2032, when it is actually expected to reach capacity 6 years earlier, in 2026. (EA pp. 3-64;4-24; PW.)

The Environmental Assessment claims the Tribe would recycle as much of the construction waste as possible, making the impact of non-recyclable construction waste minimal; however, the EA makes no attempt to quantify the total amount of construction waste that will be generated, nor the percentage of construction waste that the Tribe can realistically recycle. (EA p. 4-24.) The conclusion that the non-recyclable construction waste will be minimal is unsupported by any facts or analysis.

L3-29 Cont.

The Environmental Assessment's discussion of solid waste only includes the residential waste in Alternatives A and B and the waste generated by the full time employees in Alternative B, but fails to consider any other project elements, for instance the solid waste expected to be generated by the agricultural operations. (EA pp. 4-24; 4-46.) The EA also fails to quantify the amount of solid waste generated by events at the Banquet Hall/Exhibition Facility other than to conclude that the waste would be collected and "collected at the time of the event . . . and disposed of accordingly." (EA pp. 4-46.) With up to 100 events a year of up to 1,000 attendees, the generation of additional solid waste would be significant, an issue which the EA fails to analyze. (EA p. 2-12.)

Additionally, the Environmental Assessment makes the faulty assumption that because expected future residents already live within the County, no significant adverse impact to solid

waste disposal would occur. (EA p. 4-46.) However, with 143 new residential units, this increase in residents to the Santa Ynez Valley must be analyzed.

L3-29 Cont.

4. Schools, Parks, and Recreation

The Environmental Assessment makes the faulty assumption that because expected future residents are expected to relocate from existing housing in the Santa Ynez Valley, no significant adverse impact to schools, parks, and recreation would occur. (Page 4-25; 4-26; 4-47.) However, as discussed previously, the project is to "provide *new* tribal housing" (Page 1-1 (emphasis added)), not *replacement* tribal housing and the EA must consider all impacts related to the project's creation of 143 new residential units.

Based on the methodology in the Santa Ynez Valley Community Plan, projected student growth from the project is estimated to be 22.78 elementary students, 15.73 middle school students, and 25.74 high school students. (P&D.) The Santa Ynez Valley Community Plan includes a discussion of school enrollment issues, but because Santa Ynez Valley Community Plan is four years old, an Environmental Impact Statement is necessary for an updated analysis of the capacity of nearby schools to serve the project. (P&D.) Similarly, the increase in residents in the Santa Ynez Valley will lead to an increase in the need for parks and recreation, and this impact should be fully analyzed in an Environmental Impact Statement.

L3-30

C. Water Resources

The Environmental Assessment contains inadequate analysis of Camp 4's potential impact to groundwater resources, groundwater quality, and wastewater. An Environmental Impact Statement is necessary to evaluate all potential significant impacts to Water Resources.

L3-31

1. Groundwater Resources

The EA acknowledges the past designation of an overdraft in the Santa Ynez Uplands Groundwater Basin, but fails to analyze the potential for Camp 4 to exacerbate that overdraft. (P&D.) Moreover, the Santa Barbara County Environmental Thresholds and Guidelines Manual, attached as Exhibit B, defines the withdrawal of 61 acre-feet-per-year ("AFY") or more to be significantly adverse (Santa Barbara County Environmental Thresholds and Guidelines Manual, Table 2; pg. 61). Yet, the Environmental Assessment concludes that use of a projected 335 AFY in Alternative A and 110.3 AFY in Alternative B – five times or two times that threshold -- are not significant. (EA pp. 4-5; 4-34.) And without any proposed well locations, it is unclear whether the necessary new wells can be located so as to prevent adverse impacts to neighboring wells. Therefore, there is no analytical support for the conclusion that the new wells "would cause minimal to no off-site impacts." (P&D; EA p. 4-6.) Additionally, the pump tests on irrigation well # 2 and #3 were performed in 1984 and 1999 (EA, Appendix. C, p. 2-8.) and are no longer relevant due to potential changes in pressure head, well condition, and other factors. (PW.)

L3-32

An EIS is necessary to properly consider that supplemental supplies currently obtained from the State Water Project, that the Cachuma Project does not constitute an additional water source, and that any additional water extracted from the basin (minus return flows) will increase the magnitude of any existing overdraft. (P&D.) The EA fails to analyze long-term water supply or that water supply within the basin depends on the availability of supplemental sources including State Water and Cachuma. (P&D.) The EA should include a more thorough

discussion of water sources including the reliability of State Water, climate change considerations, and the long term reliability of the Santa Ynez River reservoirs. (PW.)

L3-32 Cont.

2. Groundwater Quality

The Environmental Assessment acknowledges that severe septic problems in the Uplands Basin have "led to significant nitrate contamination of the main groundwater body of the southern portion of the basin." (EA p. 3-15.) However, water quality samples for Baseline Avenue Well #2 were obtained in 1999 (EA p. 3-16) and are no longer indicative of water quality as there has been amble time for changes in land use, accumulation of selected contaminants, and other factors to impact the results. (PW.) The lack of current and accurate information about water quality in the project area makes it unclear whether filtering or treatment facilities would be necessary to ensure United States Environmental Protection Agency standards regarding maximum contaminant levels can be met. An Environmental Impact Statement is necessary to fully study the water quality, and if the water quality is poor, the potential methods to bring water to the site which could have significant environmental impacts.

L3-33

3. Wastewater

The Environmental Assessment fails to address that the Wastewater Treatment Plant will generate some solid waste from screenings and liquid sludge which will need to be hauled away and the environmental impacts of this waste. (PW.) An Environmental Impact Statement is necessary to address Camp 4's impact to wastewater in the Santa Ynez Valley.

L3-34

D. Biology

1. Oak Trees

The Environmental Assessment fails to take the required "hard look" at the potential biological impacts of Camp 4. There are substantial questions that Camp 4 may cause significant biological impacts, but the Environmental Assessment contains insufficient information and analysis to make this determination. The Environmental Assessment does not address the biological impact of removing the oak trees or that the number of oak trees proposed to be removed under either Alternative may cause significant biological impacts.

Oak trees "support a diverse wildlife population, and offer abundant resources to wildlife including food sources, shade in summer, shelter in winter, perching, roosting, nesting, and food storage sites." (Santa Barbara County Environmental Thresholds and Guidelines Manual, page 32.) The Environmental Assessment does not consider the biological value or location of particular trees, the potential for habitat fragmentation, the removal of understory, alteration of drainage patterns, disruption of the canopy, disruption of animal movement through the woodland or whether any trees are native specimen trees. Also, under the current proposal, the removal of oak trees is based on the construction footprint of the proposed development (EA p. 5-4), not the health, age, or type of oak tree. Additionally, the Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians provides little to no assurance that the biological impacts of the removal of oak trees will be considered because the Ordinance permits the loss of oak trees if they "pose a threat to human health or *impede development of Tribal facilities*." (EA p. 3-28 (emphasis added).) With that definition, depending upon the

L3-35

proposed project, any or all of the oak trees on the property could be removed without considering the resulting impact to biological resources.

Based on an aerial photo, there are estimated to be 333 oak trees on the project site. (P&D.) Alternative A's proposed removal of 70 trees is a 21% reduction of oak trees on the project site, and Alternative B's removal of 50 trees is a 15% reduction of oak trees on the project site, both of which may cause significant biological impacts that are not adequately analyzed in the Environmental Assessment. The Environmental Assessment fails to assess the impact of the removal of oak trees to the biological resources of the property. (Santa Barbara County Environmental Thresholds and Guidelines Manual, page 32.)

L3-35 Cont.

2. Vernal Pool Fairy Shrimp

Under Alternative A, 330.11 acres of critical habitat for Vernal Pool Fairy Shrimp would be removed from designation, and under Alternative B, 65.28 acres would be removed from designation. (EA pp. 4-13; 4-39.) The southern portion of the project site occurs within an area designated by United States Fish and Wildlife as Critical Habitat Unit 31 (EA p. 3-41) and the Environmental Assessment acknowledges that Vernal Pool Fairy Shrimp are considered to have the potential to occur within the project site, but the Environmental Assessment makes no attempt to do standard Vernal Pool Fairy Shrimp sampling to determine the presence or absence of federally listed species. (P&D.) Because the project site is located within a core area of the Vernal Pool Recovery Plan (EA p. 3-39) and the Environmental Assessment fails to identify the nature and severity of potential impacts to Vernal Pool Fairy Shrimp, an Environmental Impact Statement is necessary to fully analyze the project's impacts to Vernal Pool Fairy Shrimp. (P&D.)

L3-36

3. Western Pond Turtle- A State Listed Species

The Environmental Assessment briefly mentions that a California Species of Special Concern, the Western Pond Turtle, has the potential to occur within the project site, but states that because state listed species do not receive protection when land is taken into trust and are not necessarily afforded protection under the Federal Endangered Species Act, the Environmental Assessment dismisses the state listed species as "not further addressed within this EA." (EA p. 3-42.) Exactly because this state listed species will no longer receive protection if the project site is taken into trust, the Environmental Assessment should discuss the impact to biological resources including to this currently-protected and state listed species. The Environmental Assessment also fails to address that this California Species of Special Concern is also considered a Species of Concern by the United States Fish and Wildlife Services and that the greatest single threat to this species is habitat destruction. An Environmental Impact Statement is necessary to fully analyze the impact of the project on this biological resource and the baseline in the Environmental Impact Statement should take into consideration the current protection that western pond turtles receive under State law.

L3-37

E. Air Quality

The Environmental Assessment refers to a County 2010 Climate Action Strategy document, as well as Environmental Protection Agency Greenhouse Gas (GHG) Reporting Program Requirements, but makes no attempt to analyze the potential significance of GHG impacts. (P&D.) The Environmental Assessment relies merely on conclusory statements based on vaguely described measures from a County Climate Action Strategy

L3-38

document. (P&D.) Although this County document is a report on potential approaches to a strategy, the County has not yet adopted a Climate Action Strategy. (P&D.)

L3-38 Cont.

F. Traffic

The Environmental Assessment lacks enough specific information on Camp 4 to fully evaluate traffic impacts. However, it is apparent that Camp 4 would increase traffic and congestion on County roads, particularly under Alternative B's special event proposal of 100 events with up to 1,000 attendees per event. (EA p. 2-12; Appendix C, p. 3-1.) There are substantial questions that Camp 4 may cause a significant impact on traffic such that NEPA requires preparation of an Environmental Impact Statement.

Camp 4 parcels are currently accessed by County roads, Baseline Avenue and Armour Ranch Road, and Camp 4 will be creating new connections to those County roads. Yet, the Environmental Assessment fails to include any discussion about County regulatory setting on the roads accessing the project site. (EA p. 3-52.) For instance, the new access points which would serve Camp 4 usually require an Encroachment Permit from the County and must be designed in coordination with the County Traffic Engineer to assure safe turning movements and sight distance. (PW.) Additionally, County Oversize Load Permits and/or Haul Permits would be necessary for hauling oversize loads on Baseline Avenue and Armour Ranch Road. (PW.)

L3-39

The Environmental Assessment discusses the project's fair share contribution to traffic improvements related to the state highway system, yet fails to address how the project will contribute its fair share to any improvements to County roads made necessary as a result of the

project. (EA pp. 5-8; 5-9.) The traffic study fails to analyze the impacts of the new connections to Baseline Avenue and Armour Ranch Road and the study should be revised to include appropriate analysis as well as turn lane warrants. (PW.) All analyses should be done for both daily operations as well as times when the Banquet Hall/Exhibition Facility holds events. (PW.)

Because the specific uses of the Banquet Hall/Exhibition Facility are so poorly defined by the Environmental Assessment, the Environmental Assessment fails to adequately analyze potential traffic impacts from the Banquet Hall/Exhibition Facility. (PW.) The project description and traffic study should be refined to provide a more detailed explanation of what will occur at the Banquet Hall/Exhibition Facility as well as the anticipated peak times of use. (PW.) For instance, if concerts, conventions, or other uses become part of the scope of the project, the trip generation estimates based on its use as a "Recreational Community Center" would not be appropriate. (PW; EA, Appendix. I, p. 11.)

L3-39 Cont.

The Environmental Assessment states that to ensure visitor access to the site does not interfere with roadway operations, the Tribe will be required to contract with the California Highway Patrol for speed enforcement, lane closures, traffic breaks, and queuing control during special events. (EA pp. 4-46; 5-10.) However, this mitigation measure is in fact meant to reduce adverse impacts to *law enforcement services* and the mitigation measure *interferes* with roadway operations by providing for lane closures, traffic breaks, and queuing control. Additionally, should lane closures be necessary on County roads for any construction or event, a County traffic control plan and permit would need to be obtained. (PW.)

G. Visual Resources

There is a substantial question that Camp 4 may cause significant impacts to visual resources. Camp 4 is located adjacent to State highway 154, and there is a scenic design overlay over and surrounding Highway 154. Adding 143 residential units and potentially 80,000 square feet of Tribal Facilities, including an office complex and potentially multi-story Banquet Hall/Exhibition Facility will likely cause significant visual impacts.

The Environmental Assessment claims the proposed housing development would be similar in nature to existing low density, rural residential development but does not address that rural residential development on surrounding parcels are on larger lots, and some development is subject to review by the County design review board. (EA p. 4-31.) Adjacent rural residential lots to the east are 5 acres in size. (P&D.) Adjacent rural residential lots to the north are a mixture of 5, 10, and 20 acres in size. (P&D.) There are no lots less than 5 acres in the area. (P&D.) The Environmental Assessment in no way addresses how 1-acres lots are similar in visual character to surrounding development. (EA p. 4-49.)

L3-40

The Environmental Assessment completely fails to address the visual impact of a 79,164 square foot Banquet Hall/Exhibition Facility which is not similar to any surrounding agricultural uses or rural residential uses. (EA p. 4-49.) The EA identifies that the Community Center is proposed to have an agricultural/equestrian theme but there is no additional discussion as to whether the building will be one or multiple stories tall or whether it will be compatible with the visual resources of the surrounding area. (EA p. 2-12.) No mitigation measures are in place to ensure development on the property is consistent with the distinctive style of the Santa Ynez Valley so as to be consistent with surrounding visual resources. (EA p. 5-11.)

The Environmental Assessment also neglects to analyze Camp 4's impact on night and outdoor lighting which is regulated by County's Outdoor Lighting Regulations for the Santa Ynez Valley Community Plan Area. (County Land Use and Development Code section 35.30.120.) Camp 4's residential proposal as well as the potential Banquet Hall/Exhibition Facility will likely cause substantial light pollution, interfere with the night sky throughout the Santa Ynez Valley and cause a significant impact to visual resources.

L3-40 Cont.

The Environmental Assessment is completely inadequate in its analysis of visual resources, both in the lack of detail and the lack of recognition of the significant change that this project will cause to the relatively undisturbed, agriculturally centered Santa Ynez Valley. Thus, a full EIS analysis is required for visual resources.

IV. THE ENVIRONMENTAL ASSESSMENT'S GENERALIZED AND CONCLUSORY STATEMENTS REGARDING CUMULATIVE IMPACTS DO NOT CONSTITUTE THE "HARD LOOK" REQUIRED BY NEPA.

The Environmental Assessment's discussion of cumulative impacts consists of perfunctory general statements about possible effects and fails to provide a useful analysis of the cumulative impacts of past, present, and future projects. (*Ocean Advocates v. United States Army Corps of Eng'rs*, 402 F.3d 846, 868 (9th Cir. Wash. 2005).) The Environmental Assessment fails to provide quantified and detailed information regarding cumulative impacts and thus does not constitute the "hard look" required by NEPA. (*Id.* at 864-865; *Kern v. US Bureau of Land Management*, 284 F.3d 1062, 1075(9th Cir. 2002).) Additionally, the Environmental Assessment's cumulative impact section incorrectly focuses on the impacts of the project, rather than the *combined* impacts resulting from the activities of the project along

L3-41

with past, present, and reasonably foreseeable projects. (*Te-Moak Tribe of Western Shoshone of Nev. v. United States DOI*, 608 F.3d 592, 603-604 (9th Cir. Nev. 2010).) An Environmental Impact Statement is necessary to fully analyze and mitigate the cumulative impacts of all applicable past, present, and reasonably foreseeable projects.

A. Generalized Conclusory Statements

The Environmental Assessment's "generalized conclusory statements that the effects are not significant or will be effectively mitigated" are the type of statements that "do not constitute a hard look." (*Bering Strait Citizens for Responsible Res. Dev. v. United States Army Corps of Eng'rs*, 511 F.3d 1011, 1027 (9th Cir. Alaska 2008); *Neighbors of Cuddy Mtn. v. U.S. Forest Serv.*, 137 F.3d 1372, 1380 (9th Cir. 1998).) Consideration of cumulative impacts "requires some quantified or detailed information" in order to result in a useful analysis. (*Center for Environmental Law and Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1007 (9th Cir. 2011).) Without such information, "neither the courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide." (*Te-Moak Tribe of Western Shoshone of Nev. v. United States DOI*, 608 F.3d 592, 603 (9th Cir. Nev. 2010) (quoting *Neighbors of Cuddy Mt. v. United States Forest Serv.*, 137 F.3d 1372, 1379 (9th Cir. Idaho 1998).) The Environmental Assessment's cumulative impact section consists largely of conclusory statements and contains little quantified or detailed information.

L3-41 Cont.

For instance, the Environmental Assessment's Land Use subsection concludes that "The proposed development of residential and governmental uses on land that is currently zoned for agriculture would not contribute to the conversion of surrounding agricultural land. Existing

agricultural operations in the area would not be converted; therefore, implementation of Alternative A or Alternative B would not contribute to cumulatively considerable impacts to agriculture in the region." (EA, p. 4-64.) Another example is the Environmental Assessment's Public Services subsection which states "the combined need for public services may create a cumulative impact." (EA, p. 4-67.) Such discussions are insufficient under NEPA because they consist entirely of conclusory statements and contain no quantified or detailed information to result in a useful analysis.

Additionally, in almost every subsection the Environmental Assessment states that compliance with codes, standards, or ordinances means that no potential cumulative impacts would occur. For instance in the Visual Resources subsection, the Environmental Assessment concludes that because surrounding lands are subject to local land use regulations and lighting ordinances "the approved and pending projects that would occur in the immediate area would not result in substantial impacts to visual resources or result in significant new sources of light or glare." (EA, p. 4-68.) However, the "incremental impact[s]" of past, present, and reasonably foreseeable future actions, even if all development complies with codes, standards, and ordinances, are exactly what the Environmental Assessment is required to consider. (40 C.F.R. 1508.7.)

L3-41 Cont.

B. The Environmental Assessment Only Considers the Impacts of the Project

A cumulative impact is defined as "the impact on the environment which results from the incremental impact of the action *when added to* other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such

other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 C.F.R. 1508.7 (emphasis added)). Throughout the cumulative impact section, not only does the Environmental Assessment fail to identify any past activities in the project area, the Environmental Assessment only considers the impacts of the particular project in isolation, not environmental impacts that result from the project when added to other projects. For instance, the Air Quality subsection only discusses that *this project* would not result in adverse effects to the regional air quality environment or California's GHG reduction goals. (EA, p. 4-55–4-58.) Another example comes from the Public Services subsection, which concludes "Alternatives A or B would not result in significant cumulative impacts to public services." (EA, p. 4-67.) An Environmental Impact Statement is necessary to fully analyze and mitigate the cumulative impacts of all applicable past, present, and reasonably foreseeable projects.

L3-41 Cont.

V. MITIGATION MEASURES ARE INADEQUATE BECAUSE THEY LACK DETAIL AND CONTAIN NO DISCUSSION OF EFFECTIVENESS.

The mitigation measures identified in the Environmental Assessment are inadequate because they are a "mere listing" of mitigation measures and are insufficient to qualify as the reasoned discussion required by NEPA. (*Neighbors of Cuddy Mt. v. United States Forest Serv.*, 137 F.3d 1372, 1380 (9th Cir. Idaho 1998); *Okanogan Highlands Alliance v. Williams*, 236 F.3d 468, 473 (9th Cir. Or. 2000).) The Environmental Assessment discussion of mitigation fails to contain "sufficient detail to ensure that environmental consequences have been fairly evaluated." (*Roberison v. Methow Valley Citizens Council*, 490 U.S. 332, 350, 109 S. Ct. 1835, 104 L. Ed. 2d 351 (1989).) Additionally, the Environmental Assessment fails to provide an estimate of

L3-42

how effective mitigation measures would be if adopted, or give a reasoned explanation as to why such an estimate is not possible. (*Neighbors of Cuddy Mt, supra*, 137 F.3d at 1381.)

A. Mitigation Measures that Purport to Minimize Impact

The definition of mitigation includes "[m]inimizing impacts by limiting the degree or magnitude of the action and its implementation" (40 C.F.R. § 1508.20(b)), which the Environmental Assessment purports to do in the areas of Water Quality, Air Quality, and Public Service Resources (fire).

L3-42 Cont.

For Water Quality, the Environmental Assessment acknowledges that severe septic problems in the Uplands Basin have "led to significant nitrate contamination of the main groundwater body to the southern portion of the basin," (EA p. 3-15) yet inexplicably relies on water quality samples from 1999. Since 1999, there may have been changes in land use, accumulation of selected contaminants, and other factors that impact the results. (EA, p. 3-15; 3-16.) Water Quality mitigation measures lack sufficient detail to ensure that environmental consequences have been fairly evaluated and lack any data as to the effectiveness of the measures.

L3-43

For Air Quality, the Environmental Assessment says the mitigation measures in Section 5.3 would minimize criteria air pollutants under the cumulative year 2030 (EA, p. 4-55), but the mitigation measure merely refers to the Best Management Practices section which lists a number of general measures such as siting buildings to take advantage of shade, without providing an estimate of how effective the mitigation measures would be if adopted. (EA, p. 5-3; 2-10.) The Environmental Assessment also states the Tribe would assist the City of Solvang in expanding

L3-44

the current public transportation system, but the mitigation only vaguely says "[t]he Tribe shall work with the Santa Ynez Valley Transit to extend public transportation to the project site and construct public transportation stops on Baseline Road east of SR-154." (EA, p. 5-4.) The Environmental Assessment merely lists this mitigation measure, making it insufficient to qualify as the reasoned discussion required by NEPA. Additionally, regarding climate change, the Environmental Assessment says the Tribe will increase diversion from landfills by recycling 50% of the solid waste generated on-site; however, compliance with this measure does not meet the current 75% diversion goal required by AB 341. (EA, p. 4-57; 5-3.) This mitigation measure fails to contain sufficient detail to ensure that environmental consequences have been fairly evaluated.

L3-44 Cont.

For Public Service Resources, the Environmental Assessment states that for Alternative A, structural fire protection would be provided through compliance with a tribal ordinance and an assurance that appropriate water supply and pressure would be available for emergency fire flows (EA, p. 2-11). For Alternative B, fire protection for the tribal community facilities would be addressed through an early detection system that ensures an initial response to any fire alarm as well as smoke detection and automatic sprinkler systems. (EA, p. 2-14.) Code compliance does not mitigate the need for emergency fire response services to the project, and illustrates that the impact on local fire and emergency medical services responders has not been fairly evaluated or mitigated.

L3-45

B. Mitigation Measures that Purport to Compensate for Impact

The definition of mitigation includes "[c]ompensating for the impact by replacing or providing substitute resources or environments" (40 C.F.R. § 1508.20(e)), which the

L3-46

Environmental Assessment purports to do in the areas of Biological Resources (oak trees) and Public Services (law enforcement, fire).

For Biological Resources, the Environmental Assessment states that the impact of the removal of oak trees will be compensated for by a future Arborist Report which will provide a re-vegetation plan including proposed planting locations to ensure a "no net loss" of oak trees (EA, p. 5-4); however, the Environmental Assessment provides no estimate of how effective this measure would be to compensate for the biological impacts of habitat fragmentation, the removal of understory, alteration of drainage patterns, disruption of the canopy, or disruption of animal movement through the woodland.

L3-46 Cont.

For Public Services, the Environmental Assessment states that the impacts of special events on law enforcement will be compensated for by the Tribe entering into contracts with California Highway Patrol for speed enforcement, land closures, traffic breaks, and queuing control during special events (EA, p. 5-10); however, the Environmental Assessment's mitigation looks only to road impacts and provides no estimate of how effective this measure would be to compensate for the increased call load requesting law enforcement services anticipated with special events. The Environmental Assessment incorrectly states that there will be no impact to law enforcement or fire services because the Tribe will continue to fund the Sheriff and County Fire. (EA pp. 3-65; 3-66; 4-24.) In fact, past and future contributions to the Indian Gaming Special Distribution Fund may only be released by the Indian Gaming Local Community Benefit Committee for grant applications that "mitigate impacts from *casinos* on local jurisdictions." (Gov. Code § 12715(h) (emphasis added).) Therefore, the impacts of the project on law enforcement and fire services are not mitigated through current financial support

L3-47

from the Tribe and would not be mitigated by increased financial support through the Tribal-State Gaming Compact.

L3-47 Cont.

VI. THE ENVIRONMENTAL ASSESSMENT INACCURATELY DESCRIBES CAMP 4 AS AN "ON-RESERVATION" ACQUISITION REQUEST; HOWEVER, CAMP 4 IS NOT CONTIGUOUS TO THE EXISTING RESERVATION AND MUST NOT BE TREATED AS "ON-RESERVATION."

The Environmental Assessment inaccurately describes Camp 4 as a contiguous, "On-Reservation" acquisition. However, this is a fatal error that creates a misunderstanding throughout the Environmental Assessment. This error underlies the evaluation of impacts and creates an inaccurate analysis by implying that a contiguous acquisition has less impacts than a non-contiguous acquisition. In reality, Camp 4 is located 1.75 miles from the Tribe's existing 138-acre Reservation, and there are no shared boundaries. On September 11, 2013, the County filed a Notice of Appeal of the BIA's decision to approve the Consolidation. A copy of the County's Notice of Appeal ("Notice") is attached as Exhibit C.

L3-48

VII. THE ENVIRONMENTAL ASSESSMENT SHOULD PROPERLY DESCRIBE THE NO-ACTION AND OTHER REQUIRED ALTERNATIVES.

NEPA requires agencies to study, develop, and describe appropriate alternatives to recommended courses of action which involve unresolved conflicts concerning alternative uses of available resources. (42 USC § 4332(2)(E).) Consideration of alternatives is critical to the goals of NEPA even where a proposed action does not trigger an Environmental Impact Statement. (*Bob Marshall Alliance v. Hodel* (9th Cir. 1988) 852 F.2d 1223, 1228-1229.) NEPA

L3-49

requires an Environmental Assessment to include a brief discussion of the need for the proposal, of alternatives as required by 42 U.S.C. section 4332(2)(E), and of the environmental impacts of the proposed action and alternatives. (*Native Ecosystem Council v. US Forest Services* (9th Cir. 2005) 428 F.3d 1233, 1245.) Section 4332(2)(E) requires all agencies of the Federal Government to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." "The scope of reasonable alternatives that an agency must consider is shaped by the purpose and need statement articulated by that agency." (*'Ilio"Ulaokalani Coalition v. Rumsfield* 464 F.3d 1083, 1097-1098 (2006).) An agency "must consider all reasonable alternatives within the purpose and need it has defined." NEPA requires that alternatives be given full and meaningful consideration. (*Native Ecosystem Council v. US Forest Services* 428 F.3d at p. 1245).

L3-49 Cont.

The Environmental Assessment failed to adequately analyze the "No Action" Alternative and failed to analyze reasonable project alternatives such as an off-site, re-build, clustered development, or reduced acreage fee-to-trust acquisition.

A. No-Action Alternative

The Environmental Assessment improperly assumes that under the No-Action Alternative "the 1,433± acre project site would not be placed into trust for the benefit of the Tribe and the property would not be developed as identified under Alternatives A and B. As described in the EA, the Tribe would retain ownership of the properties in fee title, and jurisdiction would remain with Santa Barbara County. The existing vineyard would continue to operate on the project site." (EA p. 2-15.) That assumption describes the baseline, not the No-

Action Alternative. The No-Action Alternative should analyze the development that is reasonably foreseeable on the site if the proposed project does not go forward.

The Environmental Assessment states that if the property is not taken into trust, it would not be developed in the near future due to land use restrictions (EA p. 4-51); however, development on the property is not barred. Under current County regulations of the project area, even without seeking a rezoning or lot split, two additional single family dwellings could be constructed onsite, one each on two undeveloped parcels and the remaining parcel would be allowed up to four agricultural employee dwellings so long as justification is provided for the use of onsite employees. (P&D.)

An EIS should be prepared to investigate and assess the extent to which the true No-Action Alternative would meet the project's stated purpose and need, either by itself or in conjunction with other, off-site residential development. The EIS should further disclose that such development would not only be consistent with the adopted policies of the County, it could reduce both the cost of site improvements and the environmental consequences of the proposed development.

L3-49 Cont.

B. Off-Site, Re-build, Clustered Development, and Reduced Fee-to-Trust Alternative

An Environmental Impact Statement is required to correct the errors of the Environmental Assessment and analyze off-site alternatives, a re-build alternative on the current Reservation, a clustered development alternative, and a reduced acreage fee-to-trust acquisition. The purpose of the proposed action is "providing housing within the Tribal Consolidation Area to accommodate the Tribe's current members and anticipated growth." (EA p. 1-6.) When the purpose of a project "is not, by its own terms, tied to a specific parcel of land", off-site

alternatives are reasonable and should be considered as part of the EIS. (*See 'Ilio'ulaokalani Coalition v. Rumsfeld*, 464 F.3d 1083, 1098 (9th Cir. Haw. 2006).)

The Tribal Consolidation Area encompasses approximately 11,500 acres and housing for tribal members could be met by far more limited development on the project site itself, and/or in conjunction with nearby residential development consistent with local general plans and zoning. Such development could avoid land use conflicts, the removal of oaks and productive agriculture, the need for a site-specific wastewater treatment plant, and other significant adverse impacts. An EIS should be prepared to identify and analyze off-site locations that can accommodate housing development or other project components.

A re-build alternative should be analyzed that would study the impacts of redeveloping the existing residential area on the Reservation with a mixed-use, higher density 143 unit housing development with pedestrian and multi-modal transportation connections to the urban area of Santa Ynez and the Chumash casino. This would accomplish the stated purpose of providing more housing for tribal members and greatly reduce the identified significant impacts to the Camp 4 site and surrounding areas.

L3-49 Cont.

The Environmental Impact Statement should also consider a clustered development Alternative. Alternative A attempts to cluster development; however, with large 5-acre sites, it is difficult to reduce the impacts. Alternative B, which includes 1-acre home sites, does not cluster the sites and instead distributes the proposed lots across the entire property, which results in significantly more impact to biological and agricultural resources than if the lots were clustered. This alternative should be revised or replaced with a 1-acre clustered lot alternative.

The Environmental Impact Statement should consider an Alternative which takes less land into trust. To accomplish the goal of providing more tribal housing, it is unnecessary to take all 1,433 acres into trust. This alternative was mentioned but rejected in the Environmental Assessment without adequate explanation. (EA p. 2-1.) Even with one-acre sites, which are large for many Santa Barbara County subdivisions, the needed acreage is only 143 acres, with perhaps a few more acres to accommodate circulation but not all 1,433 acres. The existing Reservation already provides open space, economic development, recreation and commercial enterprise – other stated goals of Camp 4.

L3-49 Cont.

In summary, the Environmental Assessment's analysis of alternatives is completely inadequate. Alternative projects are possible and reasonable to accomplish the goals of Camp 4 without causing so many significant impacts to the environment and to Santa Barbara County residents.

CONCLUSION

Prior to any decision on Camp 4, the BIA, the County, and the public need to be fully informed about all potential significant environmental impacts. Therefore, the County respectfully requests that the BIA prepare a complete Environmental Impact Statement for Camp 4.

L3-50

BGOV CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp Fire 4 Fee to Trust Acquisition Project from Santa Ynez River Water Conservation District, Improvement District No. 1

1 message

Capili, Ivy <ICapili@bhfs.com> Mon, Oct 7, 2013 at 5:01 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: "De Felice, Diane" <DDeFelice@bhfs.com>, "Kvistad, Gary" <GKvistad@bhfs.com>

Mr. Broussard,

Please see attached comment letter submitted on behalf of Santa Ynez River Water Conservation District, Improvement District No. 1 for your consideration. The letter will also go out via first class mail to Mr. Dutschke. L4-01

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October 7, 2013

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VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region Office
2800 Cottage Way
Sacramento, CA 95825

RE: Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project

Dear Ms. Dutschke:

I. INTRODUCTION AND SUMMARY OF COMMENTS

We are general counsel for the Santa Ynez River Water Conservation District, Improvement District No. 1 (the "District"). The District appreciates the opportunity to comment on the Environmental Assessment (EA) for Camp 4 Fee to Trust Acquisition Project of the Santa Ynez Band of Chumash Indians (the "Tribe"). These comments are being submitted to help ensure compliance with the National Environmental Policy Act ("NEPA") (42 U.S.C. § 4321 et seq.). This letter has been prepared through the joint effort of the District, the District's water right engineers, Stetson Engineers, and our firm. The District requests that this comment letter and the attached reference materials be included as part of the administrative record in this matter.

L4-01 Cont.

The District was formed in 1959 under the Water Conservation District Law of 1931, Division 21, Section 74000 et seq. of the California Water Code as an Improvement District of the Santa Ynez River Water Conservation District for the purposes of furnishing water within the District's boundaries, and has operated continuously since 1959. The District functions as an Improvement District, which means it is an independent local governmental agency.

Located in the central portion of Santa Barbara County, the District serves the communities of Santa Ynez, Los Olivos, Ballard, the City of Solvang, the Tribe's Reservation and rural portions of the County. With a population of approximately 8,920 (excluding the City of Solvang), the District currently provides water directly to 2,608 municipal and industrial customers and including 110 agricultural customers.

The District currently has four sources of water supply: 1) groundwater pumped from the Santa Ynez Upland Groundwater Basin, which underlies the District; 2) the District's rights to underflow of the Santa Ynez River, 3) the water purchased from the United States Bureau of Reclamation's Cachuma Project and 4) State Water Project entitlement which the District began receiving September 12, 1997. The District's Cachuma Project water entitlement, which was unfiltered and disinfected, is now equally exchanged for State Project water entitlement owned by water agencies on the South Coast of Santa Barbara County, which is treated. The District receives delivery of 4% of its water from the State Water Project, 37% of the total supply as Cachuma Project/State Water exchange, 1% of its water supply directly diverted from the Cachuma Project, and pumps approximately 37% of its water supplies from the Santa Ynez Upland Groundwater Basin with approximately 21% from the Santa Ynez River alluvium. A map of the District's service area is attached hereto as Exhibit "A."

L4-01 Cont.

The EA arises from the Tribe's request that the Bureau of Indian Affairs ("BIA") take five parcels of land that are owned by the Tribe into trust (the "Proposed Action"). The five parcels total 1,433 acres and are located east of State Route 154 and north of Armour Ranch Road, in an unincorporated area of Santa Barbara County, east of the Town of Santa Ynez, 3.95 miles east of the City of Solvang, and 22.2 miles northwest of the City of Santa Barbara, California (the "Parcels"). The Parcels are within the 11,500 acre "Tribal Consolidation Area" for which a Tribal Consolidation and Acquisition Plan (TCAP) was approved on June 17, 2013. The Parcels are not contiguous to or within the exterior boundaries of the Tribe's existing reservation. The Parcels do not overlap with, but are immediately adjacent to, the District's service area. The Proposed Action will rely on groundwater pumped from the Uplands Basin, which is one of the District's significant water supply sources.

The alternatives evaluated in the EA consist of:

> **Alternative A** – 1,433± acre (1,411.1 acres plus rights of way) trust land acquisition within a Tribal Consolidation Area and assignment of 143 five-acre residential lots for tribal members. The residential lot assignments and access roadways would cover approximately 793 acres of the project site. The project site would include 300 acres of vineyards (256 existing acres with 44 acres dedicated for expansion), 206 acres of open space/recreational, 98 acres of riparian corridor and 33 acres of oak woodland conservation, and three acres of Special Purpose Zone- Utilities. Estimated annual water demand for Alternative A is 335 acre-feet per year (AFY).
>
> **Alternative B** – Identical trust land acquisition and development of 143 one-acre residential lots for tribal members. The residential lot assignments and access roadways would cover approximately 194 acres of the project site. The project site would include 775 acres of open space/recreational, 30 acres of tribal community facilities (including 80,000 square feet of tribal facilities), and the same acreages of vineyard, riparian corridor and oak woodland conservation, and utilities land uses as proposed under Alternative A. Estimated annual water demand for Alternative B is 106 AFY.

L4-02

Alternative C (No Action Alternative) – No federal action or proposed development.

L4-02 Cont.

As a threshold matter, the Secretary of the Interior lacks the authority to place the Parcels into trust because the Tribe was not under federal jurisdiction in 1934. *See Carcieri v. Salazar*, 555 U.S. 379 (2009) (holding that Secretary lacks the authority to place lands into trust for tribes not under federal jurisdiction by 1934). Moreover, the EA in its current form is defective for the following reasons and therefore cannot be used to support a decision by BIA on the Proposed Action: (1) the EA is based on an improperly adopted and therefore illegal TCAP; (2) the EA applies the wrong standard of review; and (3) the EA violates the NEPA by failing to consider a reasonable range of alternatives, adequately describe impacts associated with the Proposed Action's use of groundwater and by failing to properly consider the cumulative impacts of the proposed trust acquisition and other similar acquisitions based on the TCAP.

L4-03

II. THE SECRETARY DOES NOT HAVE THE AUTHORITY TO PLACE THE PARCELS INTO TRUST

The Proposed Action is based on the Secretary of the Interior's ("Secretary") purported authority to take the Parcels into trust status under 25 U.S.C. § 465[1], a provision of the Indian Reorganization Act (IRA). The United States Supreme Court has held, however, that the Secretary does not have the authority to take lands into trust for tribes that were not under federal jurisdiction in 1934, the date of the enactment of the IRA. *See Carcieri v. Salazar*, 555 U.S. 379 (2009).

L4-04

To the District's knowledge, the Tribe was not under federal jurisdiction in 1934. It was first organized as a tribe under the Articles of Organization, which its membership adopted on November 17, 1963. The Secretary approved the Articles of Organization on August 23, 1963, and later approved the Articles as a Constitution in 1964. Therefore, the Secretary does not have the authority to place the Parcels into trust for the Tribe. *See Carcieri*, 555 U.S. 379. Consequently, any environmental review associated with the Proposed Action should cease as the underlying federal action – the taking of lands into trust for the Tribe – is not authorized.

III. THE EA IS BASED ON AN IMPROPERLY ADOPTED TCAP

In the EA, BIA states that the purpose and need for taking the parcels into trust "is to fulfill the purpose of the Consolidation and Acquisition Plan." EA, p. 1-6. The TCAP, however, which was approved by BIA on June 17, 2013, was improperly adopted and therefore may not serve as the basis for the Proposed Action. The TCAP was improperly adopted because: (1) the BIA failed to give notice to interested parties before approving the TCAP; (2) BIA failed to apply a reasonable set of criteria in evaluating the TCAP; and (3) BIA failed to comply with NEPA. As a result of

L4-05

[1] 25 U.S.C. § 465 provides:

> The Secretary of the Interior is authorized, in his discretion, to acquire, through purchase, relinquishment, gift, exchange, or assignment, any interest in lands, water rights, or surface rights to lands, within or without existing reservations, including trust or otherwise restricted allotments, whether the allottee be living or deceased, for the purpose of providing land for Indians.

these improper procedures, on September 11, 2013 the County of Santa Barbara filed a Notice of Appeal challenging the decision to approve the TCAP. This appeal is currently pending and if successful, could render this EA invalid. For all the reasons set forth below, the District requests review of the EA be stayed until the County appeal process is complete.

A. BIA Failed to Provide Notice of its Consideration of the TCAP

The Tribe submitted its TCAP to BIA for approval in March 2013. The TCAP covers over 11,000 acres of both public and privately owned land, and has an obvious potential to significantly affect the ownership and use of that land. Notwithstanding that fact, BIA failed to give notice to any of the landowners within the area covered by the TCAP of the Tribe's request and afford them an opportunity to comment. BIA should thus revoke or suspend its approval of the TCAP, and should suspend its consideration of the Proposed Action, until it solicits and considers the comments of all parties interested in the TCAP.

B. BIA Failed to Apply a Reasonable Set of Criteria in Evaluating the TCAP

The Interior Board of Indian Appeals has ruled that a TCAP may only be adopted upon the basis of a reasonable set of criteria. Absentee Shawnee Tribe Of Indians of Oklahoma v. Anadarkon Area Director, BIA, IBIA 89-48-A. In approving the Tribe's TCAP, BIA failed to apply any criteria at all—let alone reasonable ones. BIA gave its approval in a two sentence decision that provided no explanation or rationale for approving the TCAP. BIA's approval of the TCAP was therefore arbitrary and capricious and must be revoked.

L4-05
Cont.

In this regard, it should be noted that BIA adopted without examination and without any record evidence the Tribe's self-serving description of the complex ownership history of the lands covered by the TCAP. If the BIA is to rely on the ownership history of the land as a reason for approving the TCAP, it must examine the title records and make specific findings on that history. It cannot simply take the Tribe's word for it.

It should also be noted that, contrary to the Tribe's claim, the TCAP is not a consolidation plan. The Tribe does not identify in the TCAP any fractionated interests or unconnected interests in lands that are owned by it or its members within the area covered by the TCAP and that the Tribe would like to be consolidated. The TCAP is nothing more than a tribal land expansion plan into an area that is publicly owned.

C. BIA Failed to Comply with NEPA

The TCAP covers over 11,000 acres of public and privately-owned land and clearly contemplates—indeed, was meant to facilitate—expansion of the Tribe's land base into that area. At a minimum, BIA's approval should have contemplated the District's title to land and existing easements, and whether it clouded title. Thus BIA's action was a federal action of significant consequence. Yet BIA failed to even consider whether NEPA applied to its approval of the TCAP, let alone to evaluate the environmental consequences of its action. For that reason, the TCAP must be revoked.

IV. THE EA APPLIES THE WRONG STANDARD OF REVIEW

Even if the TCAP had been properly approved, and could therefore be used as the basis for the Proposed Action, BIA failed to understand the legal significance of that approval and therefore applied the wrong standard of review in conducting its EA. BIA states in the EA that "property ... located within a Tribal Consolidation Area [is to be] given the same level of scrutiny as land acquisitions on or adjacent to a tribe's reservation." EA, p. 1-5. BIA is wrong. Thus, to the extent BIA's misunderstanding of the law influenced its consideration of the environmental impacts of the Proposed Action in the EA, the EA must be corrected.

BIA bases its assertion on 25 C.F.R. § 151.3(a), which states that "land may be acquired for a tribe in trust status...(1) [w]hen the property is located within the exterior boundaries of the tribe's reservation or adjacent thereto, or within a tribal consolidation area," 25 C.F.R. § 151.3. Because land "within a tribal consolidation area" is included in the same sentence as land "located within the exterior boundaries of the tribe's reservation or adjacent thereto," BIA wrongly assumes that the standard for reviewing a request to acquire land "within a tribal consolidation area" in trust (off reservation) is the same as the standard for reviewing a request to acquire on-reservation land in trust.

The standards for reviewing proposed trust acquisitions are found in 25 C.F.R. §§ 151.10 and 151.11. The standards in Section 151.10 apply only to on-reservation acquisitions, not to acquisition of lands outside the reservation that happen to be within a tribal consolidation area. For on-reservation tribal acquisitions, the Secretary must consider: (1) the existence of any statutory authority for the acquisition; (2) the tribal need for the land; (3) the purpose for which the land will be used; (4) the impact of the land's removal from state and local tax rolls; (5) the jurisdictional problems and potential conflicts of land use that may arise; (6) whether the BIA is equipped to discharge the additional responsibilities resulting from the acquisition of the land in trust status; and (7) environmental compliance. 25 C.F.R. § 151.10.

L4-05
Cont.

The standard for reviewing off-reservation acquisitions of land – i.e., acquisitions of lands that are located outside of and noncontiguous to the tribe's reservation – even if they are within a tribal consolidation area, is found in 25 C.F.R. § 151.11. For off-reservation acquisitions, the Secretary must consider the factors listed in 151.10 and, in addition, give "greater scrutiny to the tribe's justification of anticipated benefits from the acquisition" and "greater weight" to the "concerns raised by the state and local governments having regulatory jurisdiction over the land to be acquired." Specifically, Section 151.11(b) provides:

> (b) The location of the land relative to state boundaries, and its distance from the boundaries of the tribe's reservation, shall be considered as follows: **as the distance between the tribe's reservation and the land to be acquired increases, the Secretary shall give greater scrutiny to the tribe's justification of anticipated benefits from the acquisition. The Secretary**

> **shall give greater weight to the concerns raised pursuant to paragraph (d) of this section.**

25 C.F.R. § 151.11(b) (emphasis added).

L4-05 Cont.

This standard applies to all off-reservation acquisitions, without exception, and therefore must be applied to BIA's consideration of the Proposed Action. Thus, BIA must demonstrate in the EA that its analysis of the environmental impacts of the Proposed Action was not influenced in any way by its misunderstanding of the level of scrutiny that must be applied to the Proposed Action.

V. THE EA VIOLATES NEPA

A. BIA's Obligations under NEPA

NEPA compels federal agencies to consider the consequences of their proposed activities on the human environment. 42 U.S.C. § 4331. An EA is a concise public document which has three defined functions:

> (1) It briefly provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS);
>
> (2) It aids an agency's compliance with NEPA when no EIS is necessary, i.e., it helps to identify better alternatives and mitigation measures; and
>
> (3) It facilitates preparation of an EIS when one is necessary.

40 C.F.R. § 1508.9(a). An EA shall include brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E) of NEPA, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted. 40 C.F.R. § 1508.9(b).

L4-06

In determining whether to prepare an EIS, the federal agency must prepare an environmental assessment and involve environmental agencies, applicants, and the public, to the extent practicable, in preparing the EA, and then based on the EA make its determination whether to prepare an environmental impact statement. 40 C.F.R. § 1501.4(b)-(c). The agency must then determine whether it will prepare an EIS. 40 C.F.R. § 1501.4(c). If an agency determines an EIS will be prepared, it must begin the scoping process, but if the agency determines on the basis of the EA that no EIS will be prepared, it must prepare a finding of no significant impact (FONSI). 40 C.F.R. § 1501.4(d)-(e).

In preparing the appropriate environmental document, the BIA is governed not only by the text of the NEPA statute and the Council on Environmental Quality's (CEQ) implementing regulations, but also by the Department of the Interior's NEPA implementing procedures. See, e.g., 65 Fed. Reg. 52212 (Aug. 28, 2000). These procedures require that the underlying environmental analysis

> factually, objectively, and comprehensively analyze the environmental effects of the proposed actions and their reasonable alternatives. [The agency should] systematically analyze the environmental impacts of alternatives, and particularly those alternatives and measures that would reduce, mitigate or prevent adverse environmental impacts or which would enhance environmental quality.

65 Fed. Reg. at 55213.

Under NEPA, the Intergovernmental Coordination Act of 1968 (31 U.S.C. § 6506), and the Intergovernmental Coordination Executive Order (Exec. Order No. 12,372, reprinted in 31 U.S.C. § 6506), federal agencies are required to solicit and consider local views on their projects to the degree to which the potential impacts may produce serious conflicts with local entities and conditions.

Specifically, the CEQ NEPA Regulations "encourage" integration with state and local land use requirements (with the goal of "one project-one document"). As part of this process the lead agency can designate "cooperating agencies" that are involved in the NEPA document preparation and may use the document to satisfy their own environmental review requirements to the extent allowed by law. At the request of the lead agency, any federal, state, local or tribal agency with jurisdiction by law or special expertise can be a cooperating agency.

L4-06 Cont.

To the extent possible, all national, regional, State, and local viewpoints shall be considered in planning development programs and projects of the United States Government or assisted by the Government. State and local government objectives and the objectives of regional organizations shall be considered within a framework of national public objectives expressed in laws of the United States. Available projections of future conditions in the United States and needs of regions, States, and localities shall be considered in plan formulation, evaluation, and review. 31 U.S.C. § 6506(c).

Moreover, CEQ NEPA Regulations require federal agencies to address inconsistencies between a proposal and state/local laws or plans. The NEPA document should describe the extent to which the federal agency would reconcile the inconsistency. 40 C.F.R. § 1506.2(d); *see also Village of Palatine v. U.S. Postal Service*, 756 F.Supp. 1079 (N.D. Ill. 1990) (addressing the extent to which a federal agency must document compliance with the Intergovernmental Cooperation Act, explain a decision to conflict with local regulations, and consider project alternatives).

B. The EA Does Not Consider All Reasonably Foreseeable Alternatives.

NEPA requires the consideration of a reasonable range of alternatives to any proposed action. 40 C.F.R. § 1502.14. The EA does not comply with this requirement. It considers only those alternatives that reflect the Tribe's present plans for the development of the parcels. Once the

L4-07

land is taken into trust, however, the Tribe will presumably be free to change its development plans and, unless those changed plans require further BIA approval, they will escape review under NEPA. Thus, for BIA to comply with NEPA in approving the Proposed Action, it must consider all reasonably foreseeable development scenarios for the Parcels, and not just the ones that reflect the Tribe's current plans.

L4-07 Cont.

C. The EA's Analysis of Water Resources and Associated Impacts is Deficient

The EA states that for both Alternative A and Alternative B, the Tribe would develop an on-site water supply system that relies on groundwater. EA, pp. 2-7, 2-14. Agricultural irrigation demands are estimated to be 265 AFY with those demands being met through mixing groundwater from existing agricultural wells and recycled water from a wastewater treatment plant (WWTP).

The groundwater supply to be relied on for both Alternative A and Alternative B is groundwater pumped from the Uplands Basin. Figure 1 (attached) depicts the location of the Uplands Basin relative to the TCAP area. Figure 2 depicts the location of the Uplands Basin relative to the Parcels. About half of the TCAP area overlies the basin. The Parcels are entirely within the boundaries of the Uplands Basin. As noted in the EA, the Uplands Basin is in a state of overdraft (EA, pp. 3-11, 4-5.), meaning the annual extractions from the basin exceed annual recharge to the basin and without taking corrective actions to balance extractions and recharge, the volume of water in the basin will steadily decrease over time. The EA states that despite this state of overdraft, altered pumping patterns throughout the County and the importation of supplemental water has resulted in more balanced groundwater conditions. It further notes that these changes in water use and the rising water table in the area of the Proposed Action suggest that the three existing wells can be relied upon for agricultural use. EA, p. 4-5. This conclusion is incorrect.

L4-08

As noted in the technical comments below, the hydrograph in Appendix C of the EA indicates declining water levels in the Uplands Basin for the period 2003 to 2012. More importantly, the additional extractions associated with the Proposed Action will exacerbate the overdraft conditions in the basin and as groundwater levels continue to drop, the District wells may experience adverse impacts such as lower water levels and resulting decreased production. The Proposed Project's pumping may require the District to lower pump levels, deepen wells or add treatment due to changes in water quality. In addition, the concept that the Proposed Action can rely on groundwater because the importation of supplemental water by the District in the Uplands Basin has decreased total extractions ignores the fact that the District expended significant funds to purchase that supplemental water to offset its decreased reliance on groundwater. In other words, the Proposed Action does not include equitable cost sharing of the actual costs of water if the Tribe is simply permitted to extract groundwater while the District is spending significant sums on supplemental water. It is not clear that the proposed mitigation will adequately mitigate potential impacts to the District. The mitigation measure will certainly not avoid the general adverse impacts to the Uplands Basin associated with increased extractions since the basin is already in overdraft.

The EA also fails to provide clear, consistent information about water demands for the Proposed Action. For example, in the Project Alternatives discussion for Alternative A, the EA states that implementation of Alternative A would result in an increased water demand of 380 AFY. EA, p. 2-7. However, in the Alternative B discussion, there is no corresponding explanation of estimated increased water demand. See EA, p. 2-12 to 2-14. L4-09

Below are more specific technical comments regarding the deficiencies in the EA's impact analysis of water demand:

Water Quality Results. Appendix C, Table 2-6, page 2-11 shows electrical conductivity (EC) at 827 umhos/cm. At this EC level, additional irrigation water will need to be added to leach salts from the soil. The vineyard water demand calculation does not provide for additional leaching water. If the additional leaching water requirement is 12% of the net irrigation requirement then the estimated additional annual water use will be approximately 28 AFY. L4-10

Frost Protection Water Demand. Many vineyards in the Santa Ynez Valley use water for frost protection. The proposed/existing 300 acre vineyard water use assumes 0.75 acre-feet per acre for irrigation but does not include water use for frost protection. The EA also fails to discuss the potential location of storage ponds needed to supply the water demand for frost protection, which could be up to 50 gallons per minute (gpm) per acre or 15,000 gpm for the entire 300 acre vineyard. A conservative estimation for the water supply needed to combat frost is six frost events lasting for six hours each. The estimated additional annual water use to address this scenario is approximately 100 AFY.

Residential Outdoor Water Demand. Appendix C, Page 2-2 (Potable Water Demand) estimates the water demand for Alternative A, which involves construction of 143 single family home sites that are five acres each. The outdoor water use assumes 1.85 acres of each five acre lot will be irrigated with low water use landscaping with an annual water use of 1.85 acre-feet or 1.0 acre-feet per acre. Other outside water use assumes 0.15 acres of lawn at 3.0 acre-feet per acre per year. The EA omits an estimate of water use for gardens, swimming pools and/or irrigated pastures that may occur on the five-acre residential parcels. Many five-acre parcels located in the Santa Ynez area are used for grazing horses on irrigated pasture. If 50% of the five-acre lots have approximately 3 acres of irrigated pasture at 3.0 acre-feet per acre the estimated additional annual water use will be approximately 644 AFY for Alternative A. If each one acre parcels proposed for Alternative B has 0.5 acres of irrigated pasture then the estimated additional annual water use will be approximately 108 AFY for Alternative B. The potential additional annual water use is significant in comparison to the total estimated annual water demand for Alternative A and Alternative B, which are 335 AFY and 106 AFY, respectively. L4-11

Total Water Demand. The EA's omission of water demand for frost protection and underestimation of outdoor water use, as described above, has resulted in underestimation of total water demand for both Alternatives A and B. The EA estimates that Alternatives A and B would result in an increased water demand of approximately 380 AFY and 155 AFY, respectively. EA, p. 2-7. Adding in the additional water demands for leaching (28 AFY), frost protection (100

AFY), and irrigated pasture (644 AFY and 108 AFY respectively) that were overlooked in the EA as described above, the increased water demand is estimated at 722 AFY for Alternative A and 236 AFY for Alternative B. As noted above, all demand will be satisfied by extractions from the Uplands Groundwater Basin but the basin is already overdrafted and cannot sustain any increase in demand. The Thirty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District 2012-2013 (dated April 19, 2013) reports annual change in groundwater storage of -2,400 acre-feet (i.e., annual overdraft) for 2012 to 2013 and an accumulated overdraft of 41,800 acre-feet from 2001 to 2013. (Thirty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District 2012-2013, p. 38, Table 16.) The District spent a considerable amount of money on delivery infrastructure necessary to import supplemental water from the State Water Project (SWP) into the District's water system to reduce its groundwater pumping and mitigate the annual and accumulated overdraft in the overdrafted Uplands Basin. Alternative A is expected to result in a 30% increase (additional demand of 772 AFY/existing overdraft of 2,400 AFY) in the annual overdrafting of the basin and will exacerbate the accumulated overdraft. In the long term, the exacerbation of the overdraft condition will increase pumping costs and eventually exhaust the available groundwater supply. The increased water demand associated with the Proposed Action is not sustainable.

L4-11 Cont.

Water Table. The EA asserts that the groundwater table in the project area "is rising" which suggests that the groundwater supply "can be relied upon." EA, p. 4-5. But this assertion is refuted by information in Appendix C, page 2-18, Figure 2-5 which shows well hydrograph for well 32R1. Well 32R1 extracts water from the Uplands Basin and is located near the two production wells used to irrigate the existing vineyard. The vineyard was planted in 2003, and since that time well 32R1 hydrograph shows a steady decline from 2003 to 2012. The well hydrograph suggests that the groundwater table in the area of the Proposed Action is in a state of decline, which is consistent with the trend and overall state of overdraft in the Uplands Basin. The decline in the well 32R1 hydrograph supports the conclusion that the increased water demand associated with the Proposed Action is not sustainable.

L4-12

Sewer Service. In Appendix C, Figure 3-1 (Sewer Collection System Layout) Alternative A show the gravity sewer line at a higher elevation than the five-acre lots located at the south boundary of the property just north of Amour Ranch Road. An additional sewer line should be located at Amour Ranch Road for the southern parcels or each parcel will need a sewer lift pump.

L4-13

D. The EA Fails to Properly Consider Cumulative Impacts, Resulting in Improper Segmentation.

Under NEPA, an EA must assess the cumulative effects of the proposed action. The CEQ regulations define cumulative effects as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and **reasonably foreseeable future actions** regardless of what agency (Federal or non-Federal) or person undertakes such actions." 40 C.F.R. §1508.7 (emphasis added.) *See Te-Moak Tribe Of Western Shoshone of Nevada v. United States Department of The Interior*, 608 F.3d 592 (9th Cir. 2010).

L4-14

The purpose of cumulative effects analysis is to ensure that the federal decision-makers consider, and disclose to the public, the full range of consequences that may flow from a proposed action.

As discussed, the TCAP includes the "geographical area . . . encompassing approximately 11,500 acres." The Parcels subject to the EA, however, encompass only 1,433 acres within the Tribal Consolidation Area. The TCAP provides that: "[t]the Santa Ynez Band of Chumash Mission Indians has clear connections to the Tribal Consolidation Area based on law and cultural use. **The tribal government has the opportunity to return the lost land – which it has had to purchase back – to its jurisdiction and stewardship once more through federal trust status. The intent of this Plan is to assist the Tribe with that goal.**" TCAP, p. 3 (emphasis added).

Based on the TCAP, it is reasonably foreseeable that the Tribe will seek to place additional lands within the Tribal Consolidation Area into trust status. However, the EA fails to consider "the incremental impact of the [proposed action] action when added to" these "reasonably foreseeable" future actions by the Tribe and limits its environmental analysis to the Camp 4 trust acquisition. This deferral of consideration of impacts amounts reveals the "piecemealing" or "segmentation" of a larger integrated project into smaller projects that has occurred because as observed above, no environmental review of the broader TCAP was conducted prior to consideration of the Proposed Action. The additional acquisitions are reasonably expected as part of the TCAP and should be accounted for in the Draft EA by the Tribe. For example, potential water demand for the governmental, housing and economic development for the 11,500 acres under the TCAP would be substantially higher than the development under the Proposed Action. The EA is therefore deficient. Unless and until the TCAP is revoked, for the reasons described above, the reasonably foreseeable actions that may be taken pursuant to it must be taken into account in the cumulative effects analysis of the Proposed Action.

L4-14 Cont.

VI. CONCLUSION

For the reasons give above, the District respectfully requests that BIA cease its consideration of the Proposed Action unless and until it: (1) determines that it has jurisdiction to take land into trust for the Tribe; (2) has properly evaluated and adopted, following public notice and comment, a TCAP; and (3) has fully complied with NEPA in considering both the TCAP and the Proposed Action.

L4-15

///

Sincerely,

Gary M. Kvistad/Diane C. De Felice

GMK:ibc

Attachments

cc: Chad Broussard, Environmental Protection Specialist
Chris Dahlstrom, General Manager
Santa Ynez River Water Conservation District, Improvement District No. 1

TABLE OF CONTENTS

EXHIBIT A

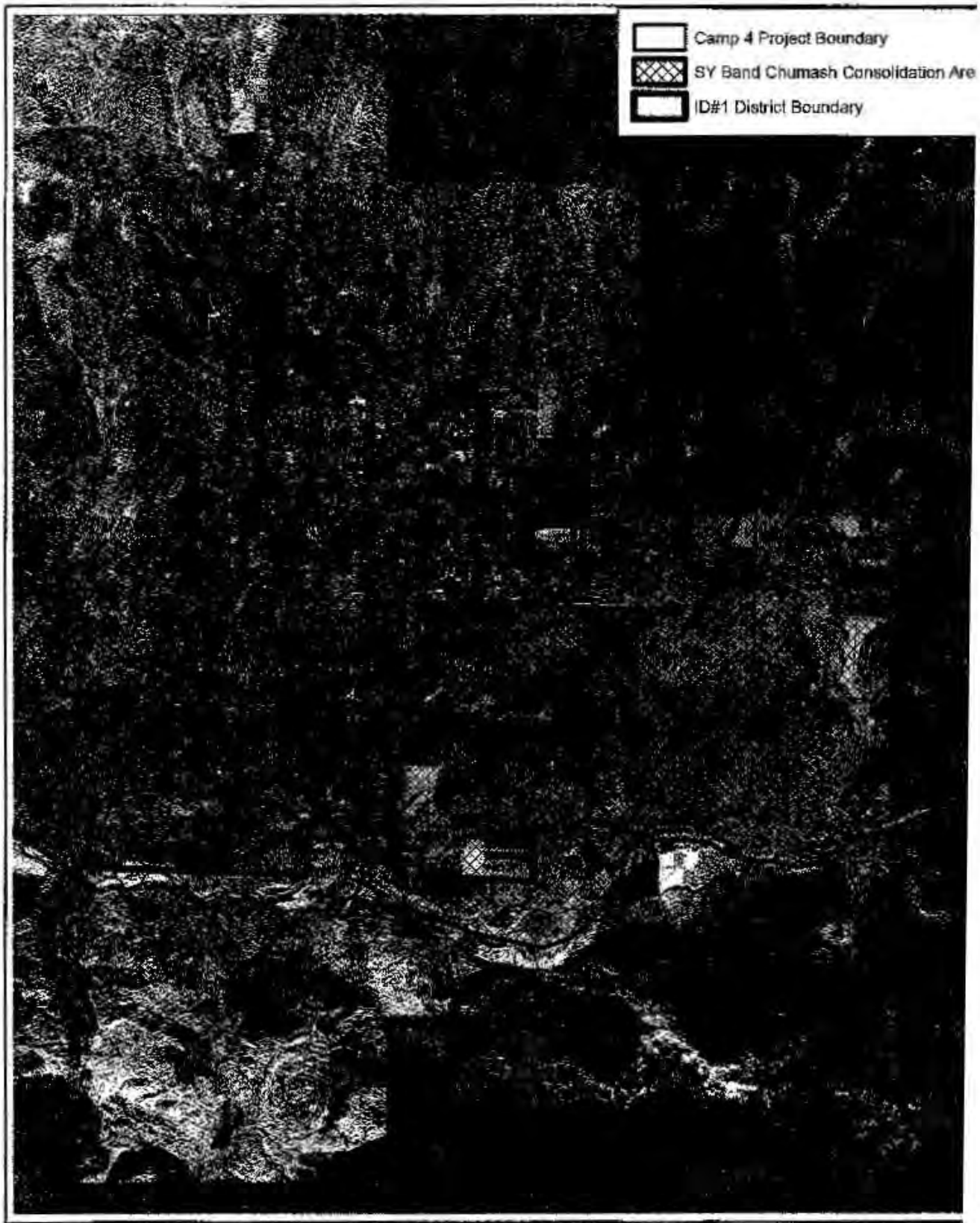
Camp 4 Project Boundary
SY Band Chumash Consolidation Are
ID#1 District Boundary
Notes: SYB Chumash boundaries estimated from Camp 4 Fee to Trust Enviro Assessment (2013)
Scale - 1:70,000
Santa Ynez River Water Conservation District, ID #1
Santa Ynez Band Of Chumash Indians
Camp 4 Site Overview
N
W
E
S
Date: 10/07/2013
Miles
0
0.75

FIGURE 1

FIGURE 1
11,500 Acre
Project Boundary
Santa Ynez Indian Reservation
0 1 2 3 4 5
Miles
SANTA YNEZ UPLAND GROUNDWATER BASIN AND PROJECT BOUNDARY
BASED ON LAND CONSOLIDATION AND ACQUISITION PLAN

FIGURE 2

SANTA YNEZ UPLAND GROUNDWATER BASIN AND
PROJECT BOUNDARY BASED ON CAMP 4 TRUST ACQUISITION

FIGURE 2

Comment Letter L4 (Cont.)

Comment Letter L5

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence from Cam Van Wingerden, on behalf of the Santa Barbara County Executive Officer Chandra Wallar, regarding submission of a comment letter from the County.

Comment Letter L6

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is solely correspondence from Cam Van Wingerden, on behalf of the Santa Barbara County Executive Officer Chandra Wallar, regarding submission of a comment letter from the County.

Brownstein Hyatt Farber Schreck

Ryan A. Smith
Attorney at Law
202.747.0507 tel
202.296.7009 fax
rsmith@bhfs.com

October 18, 2013

Ms. Amy Dutschke, Director
Bureau of Indian Affairs - Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Re: Supplement Comments on the Land Consolidation and Acquisition Plan of the Santa Ynez Band of Chumash Indians/Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project Based on New Information

Dear Director Dutschke:

We are writing on behalf of Santa Ynez River Water Conservation District, Improvement District No. 1 (the "District") concerning the (1) Santa Ynez Band of Chumash Indians' (the "Tribe") Land Consolidation and Acquisition Plan ("LCAP") and (2) the Environmental Assessment (EA) prepared in connection with the LCAP for the for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project (the "Fee-To-Trust Application"). BIA approved the LCAP on June 17, 2013, and is currently considering the Tribe's Fee-To-Trust Application. On October 7, 2013, the District provided you with comments on the EA. Since the District's submission of its comments, new information has become available that directly impacts the EA. Accordingly, the District is submitting these supplemental comments on the EA to specifically address this new information. L7-01

As discussed below, the underlying rationale for the EA is the Tribe's LCAP. Since the District filed its comments, the Tribe has withdrawn its LCAP. On October 11, 2013, the Tribal Chairman wrote to you stating that the Tribe "withdraw[s] without prejudice" the "Tribal Consolidation Area (TCA) application dated March 27, 2013 as approved on June 17, 2013." Enclosed with the letter is tribal Resolution #826A, dated October 9, 2013, in which the Tribal Business Committee resolves that the TCA Application be withdrawn and in which it authorizes the Tribe's Chairman "to negotiate, sign, and execute any and all documents required or necessary to implement such WITHDRAWAL WITHOUT PREJUDICE." L7-02

1350 I Street, NW, Suite 510
Washington, DC 20005-3305
main 202.296.7353

As you know, BIA's approval of the TCA Application (also referred to as the LCAP) has sparked significant controversy among the citizens of Santa Barbara County where the TCA is located. Among other things, there are presently six separate appeals of BIA's decision pending before the Interior Board of Indian Appeals (IBIA). The Tribe's letter, which was copied to IBIA, requests that "any appeals to such TCA" also be dismissed without prejudice, which should only occur if BIA approval of the TCA Application is revoked.

In view of the Tribe's withdrawal of its TCA Application, we respectfully request that the BIA immediately take the following actions to clarify the exact status of this matter for all concerned:

1. Confirm in writing and announce publicly that BIA's June 17, 2013, approval of the TCA Application is revoked and that BIA will take no further actions in reliance on it.

2. Confirm in writing and announce publicly that if the Tribe re-submits its TCA Application for approval, whether in its original form or with modifications, that the public will be given notice of the submission and will also be given an opportunity to comment on the LCAP before BIA takes any action on it.

3. Confirm in writing and announce publicly that BIA is ceasing its consideration of the Camp 4 Fee-To-Trust Application and has returned the application to the Tribe.

L7-02
Cont.

Request No. 3 is based on the fact that the draft EA, which was prepared by BIA in connection with the Fee-To-Trust Application, states that "[t]he Tribe's purpose for taking the 1,411.1 acres plus rights of way [of Camp 4] land into trust is to fulfill the purpose of the Consolidation and Acquisition Plan." As the underlying rationale for the Camp 4 fee-to-trust application has now been removed, BIA has no basis for continuing its consideration of it.

Moreover, even if BIA had a basis for continuing its consideration of the Camp 4 application, the draft EA, in light of the Tribe's withdrawal of its TCA Application, has a fatal flaw. As the EA states on page 1-5, it was prepared on the assumption that because the Camp 4 lands were within an approved TCA, they were to be "given the same level of scrutiny as land acquisition[s] on or adjacent to a tribe's reservation," even though the Camp 4 lands themselves are all off-reservation lands. However, as the Camp 4 lands are now no longer within an approved TCA, they must be given the "greater scrutiny" required by BIA's regulations for acquisitions of off-reservation lands. The regulations state that in such cases BIA "shall give greater scrutiny to the tribe's justification of anticipated benefits from the acquisition," and "greater weight to the concerns raised" by state and local governments "as to the acquisition's potential impacts on regulatory jurisdiction, real property taxes and special assessments." 25 CFR §151.11(b). In addition, in order to justify taking off-reservation lands into trust, BIA must affirmatively find that the "acquisition of [the] lands is necessary to facilitate tribal self-determination, economic development, or Indian housing." *Id.* at 151.3(a) (emphasis added). As the EA was not prepared with these legal considerations in mind, it is fatally flawed.

We look forward to a prompt response clarifying the status of this matter for the District and it customers as requested above. L7-03

Sincerely,

Ryan A. Smith

cc: Chris Dahlstrom, General Manager, Santa Ynez River Water conservation District, Improvement District No. 1
Gary M. Kvistad, General Counsel, Brownstein Hyatt Farber Schreck

Comment Letter L8

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter only provides comments from Santa Barbara County Executive Officer Chandra Wallar on the fee-to-trust application associated with the EA.

Comment Letter L9

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is from Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1 regarding legal actions associated with the TCA.

Comment Letter L10

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is from Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1 regarding legal actions associated with the TCA.

Comment Letter L11

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is from Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1 regarding legal actions associated with the TCA.

The City of SOLVANG
Danish Capital of America

Reg Dir ____
Trust ____
Dep RD IS ____
Route ____
Response Required ____
Due Date ____
Memo ____ Ltr ____
Fax ____

October 2, 2013

Amy Dutschke
Pacific Regional Office Director
2800 Cottage Way
Sacramento, CA 95825

RE: **Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Environmental Assessment Review**

Dear Ms. Dutschke:

The City of Solvang has reviewed the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition and has the following comment regarding the Traffic Impact Study, Appendix I to the EA. L12-01

On page 36 of the Study it states:

"It is noted that the SR246/Alamo Pintado Road intersection lies within the City of Solvang. The City prepared a Project Study Report to address the future deficiency. The project is now in the PA/ED phase and preferred alternative is to convert the intersections into a modern roundabout. The project is anticipated to be constructed in Year 2015."

The City of Solvang did prepare a PSR and moved into the PA/ED phase, but due to a Caltrans requirement for the City to show a full project funding commitment to receive approval of the Environmental Document the project was shelved by the City Council on February 13, 2012. Additionally while a roundabout was an alternative in the PSR, the City Council did not endorse it as the preferred alternative. So it is inaccurate to indicate that the project is anticipated to be constructed in 2015 or make that assumption that the improvement will be made in the analysis of the traffic impacts. L12-02

If you have any questions feel free to contact our City Manager, Brad Vidro at (805) 688-5575 or email at brady@cityofsolvang.com. L12-03

Sincerely,

Jim Richardson

Mayor
City of Solvang

Comment Letter L13

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter L3.

Comment Letter L14

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter L4.

Comment Letter L15

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter L3.

Comment Letter L16

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter L8.

Brownstein Hyatt Farber Schreck

Ryan A. Smith
Attorney at Law
202.747.0507 tel
202.296.7009 fax
rsmith@bhfs.com

October 30, 2013

Ms. Amy Dutschke, Director
Bureau of Indian Affairs-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

RE: Environmental Assessment for the Santa Ynez Band of Chumash Indians Camp 4 Fee-to-Trust Acquisition Project

Dear Director Dutschke:

On October 18, 2013, we wrote to you on behalf of the Santa Ynez River Water Conservation District, Improvement No. 1 concerning the (1) Santa Ynez Band of Chumash Indians (the "Tribe") Land Consolidation and Acquisition Plan ("LCAP") and the (2) Environmental Assessment (EA) prepared in connection with the LCAP for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project (the "Fee-To-Trust Application"). By a letter to you dated October 13, 2013, we noted that the Tribe had withdrawn its LCAP. In light of the Tribe's action, we requested that you take three specific steps to clarify for all concerned the status of the Tribe's pending request to have land taken into trust in accordance with the LCAP. As Step 1, we requested that you confirm that your approval of the LCAP is revoked and that BIA will take no further actions in reliance on it.

L17-01

On October 29, 2013, we received the attached Order from the Interior Board of Indian Appeals (IBIA). The Order dismissed as moot the several appeals of your June 17, 2013 decision that had been filed with it. Then, "in the interest of clarity and because parties sometimes seek to attach significance to a moot decision," IBIA did what we had requested that you do as Step 1--i.e., it vacated your decision.

Received
PRES 11-4-13

While we welcome and applaud IBIA's decision, we wish to make clear that it is still imperative that you take Steps 2 and 3, as set forth in our October 18 letter. We repeat our request that you, "in the interest of clarity":

> 1. Confirm in writing and announce publicly that if the Tribe re-submits its TCA Application for approval, whether in its original form or with modifications, that the public will be given notice of the submission and will also be given an opportunity to comment on the LCAP before BIA takes any action on it.
>
> 2. Confirm in writing and announce publicly that BIA is ceasing its consideration of the Camp 4 fee-to-trust application and has returned the application to the Tribe.

As we explained in our earlier letter, our request that BIA cease consideration of the Tribe's Camp 4 fee-to-trust application is based on the fact that the draft Environmental Assessment (EA) which was prepared by BIA in connection with the application states that "[t]he Tribe's purpose for taking the 1,411.1 acres plus rights of way [of Camp 4] land into trust is to fulfill the purpose of the Consolidation and Acquisition Plan." As the Tribe has now withdrawn its LCAP, and as IBIA has vacated your decision approving the LCAP, there is now no basis for continuing to consider the Tribe's application. L17-02

Moreover, even if BIA had a basis for continuing its consideration of the application, the draft EA, in light of the Tribe's withdrawal of its LCAP, has a fatal flaw. As the EA states on page 1-5, it was prepared on the assumption that because the Camp 4 lands were within an approved TCA, they were to be "given the same level of scrutiny as land acquisition[s] on or adjacent to a tribe's reservation," even though the Camp 4 lands themselves are all off-reservation lands. However, as the Camp 4 lands are now no longer within an approved TCA, they must be given the "greater scrutiny" required by BIA's regulations for acquisitions of off-reservation lands. The regulations state that in such cases BIA "shall give greater scrutiny to the tribe's justification of anticipated benefits from the acquisition," and "greater weight to the concerns raised" by state and local governments "as to the acquisition's potential impacts on regulatory jurisdiction, real property taxes and special assessments." 25 CFR §151.11(b). In addition, in order to justify taking off-reservation lands into trust, BIA must affirmatively find that the "acquisition of

[the] lands is necessary to facilitate tribal self-determination, economic development, or Indian housing." *Id.* at 151.3(a) (emphasis added). As the EA was not prepared with these legal considerations in mind, it is fatally flawed.

L17-02 Cont.

We look forward to a prompt response clarifying the status of this matter for ourselves and the public generally as we have requested.

L17-03

Sincerely,

Ryan A. Smith

cc:

Mr. Gary Kvistad

Brownstein Hyatt Farber Schreck

Gary M. Kvistad
Attorney at Law
805.882.1414 tel
805.965.4333 fax
GKvistad@bhfs.com

November 11, 2013

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region Office
2800 Cottage Way
Sacramento, CA 95825

RE: Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Application

Dear Ms. Dutschke:

This letter supplements Santa Ynez River Water Conservation District, Improvement District No. 1's (District) comments submitted to the Bureau of Indian Affairs (BIA) on October 7, 2013 and October 18, 2013 regarding the Environmental Assessment for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee-to-Trust (EA) application (Application). Copies of those comment letters are attached hereto as Exhibits A and B, respectively. In sum, the District requests reconsideration of the Application's completeness, as the underlying basis of the application, non-contiguous parcels sought to be put into trust within the Tribal Consolidation Area, no longer exists.

L18-01

L18-02

As you know, the EA arises from the Tribe's request that the BIA take five parcels of land that are owned by the Tribe into trust (the "Proposed Action"). The five parcels total 1,433 acres and are located east of State Route 154 and north of Armour Ranch Road, in an unincorporated area of Santa Barbara County. More particularly, the parcels are east of the Town of Santa Ynez, 3.95 miles east of the City of Solvang, and 22.2 miles northwest of the City of Santa Barbara, California (the "Parcels"). When the Application was submitted on July 12, 2012, the Parcels were within the 11,500 acre "Tribal Consolidation Area" for which the Regional Director of the BIA approved a Tribal Consolidation and Acquisition Plan (TCAP) on June 17, 2013. The Parcels are not contiguous to or within the exterior boundaries of the Tribe's existing reservation. The Parcels do not overlap with, but are immediately adjacent to, the District's service area.

By letter dated October 11, 2013, the Tribe withdrew its TCAP for the 11,500 acres of land, including the lands that are involved in the Tribe's Camp 4 Fee-to-Trust Application. *See* 58 IBIA 58, 59; *see also* October 11, 2013 letter attached hereto as Exhibit C. Accordingly, by order dated October 24, 2013, the Interior Board of Indian Appeals (IBIA) vacated the Regional Director's decision to approve the TCAP. 58 IBIA at 60. In its order, the IBIA further commented that in approving the TCAP, "[i]t appears that BIA neither sought public comment on the Plan nor issued a public notice of the Decision." *Id.* at 58. IBIA further stated that "should the Tribe resubmit its original Plan, or submit a new plan for approval, BIA must consider the situation with a 'clean slate,' [citation omitted] without regard for [its prior decision]." *Id.* at 60. IBIA thereafter also dismissed as moot the 11 appeals filed challenging BIA's June 17, 2013 approval of the TCAP. *Id.* at 59.

L18-03

1020 State Street
Santa Barbara, CA 93101-2711
main 805.963.7000

The EA states that the Tribe's fundamental purpose for taking the 1,411.1 acres of land plus rights of way into trust is to fulfill the purpose of the TCAP by providing housing within the Tribal Consolidation Area to accommodate the Tribe's current members and anticipated growth. EA, p. 1-6. However, given that the Tribe has withdrawn its TCAP and the IBIA vacated BIA's decision approving the TCAP, this stated purpose is no longer accurate. As a result, the Application and the EA rely on a set of underlying factual circumstances that no longer exist (i.e. an approved and operative TCAP) and thus BIA has no basis for continuing to consider the now incomplete Application. Accordingly, BIA should cease its consideration of the Application until the Tribe submits an updated Application accurately setting forth the underlying facts. If the Tribe submits an updated Application, the BIA would need to prepare an updated EA as indicated by the IBIA. L18-04

Even if the BIA had a basis for continuing its consideration of the Application as submitted, a new stricter scrutiny standard of review applies to consideration of the Application. See 25 C.F.R. § 151.11. According to the EA, the BIA's approval of the TCAP means that "the trust application for the proposed trust parcels constitutes a request for land acquisition within an approved Tribal Consolidation Area under the authority granted to the federal government under 25 CFR 151.3(a)(1)." EA, p. 1-5. Accordingly, the EA asserts that the decision regarding whether to take these lands into trust is to be "given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation." *Id.* Even assuming that is the proper standard of review where an approved TCAP is in place[1], under the present circumstances (i.e. no TCAP) this is clearly the incorrect standard of review. As the Camp 4 lands are no longer within an approved TCAP, they must be given the "greater scrutiny" required by BIA's regulations for acquisitions of off-reservation lands. See 25 C.F.R. § 151.11. Because the EA is now predicated on an improper standard of review, a new analysis must be conducted to demonstrate that analysis of the Proposed Action's environmental impacts has met the stricter review standard, and was not influenced in any way by the BIA's misunderstanding of the more lenient standard previously given to the Proposed Action. L18-05

Given that the Tribe has withdrawn its TCAP and the IBIA vacated the decision approving the TCAP, and for all the reasons above, the District respectfully requests that BIA cease its consideration of the Proposed Action or alternatively re-consider the Proposed Action after either a new TCAP is approved or the Tribe submits an updated Camp 4 Fee-to-Trust Application. L18-06

Please feel free to contact me directly with any questions regarding this request.

Sincerely,

Gary M. Kvistad

GMK:ibc

Attachments

cc: Chris Dahlstrom, General Manager
Santa Ynez River Water Conservation District, Improvement District No. 1

[1] In its October 7, 2013 letter, the District contested this characterization of the applicable standard of review. See Exhibit A at p. 5-6.

EXHIBIT A
TO NOVEMBER 11, 2013
CORRESPONDENCE

Brownstein Hyatt
Farber Schreck

October 7, 2013

Gary M. Kvistad
Attorney at Law
805.882.1414 tel
805.965.4333 fax
GKvistad@bhfs.com

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Region Office
2800 Cottage Way
Sacramento, CA 95825

RE: Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project

Dear Ms. Dutschke:

I. INTRODUCTION AND SUMMARY OF COMMENTS

We are general counsel for the Santa Ynez River Water Conservation District, Improvement District No. 1 (the "District"). The District appreciates the opportunity to comment on the Environmental Assessment (EA) for Camp 4 Fee to Trust Acquisition Project of the Santa Ynez Band of Chumash Indians (the "Tribe"). These comments are being submitted to help ensure compliance with the National Environmental Policy Act ("NEPA") (42 U.S.C. § 4321 et seq.). This letter has been prepared through the joint effort of the District, the District's water right engineers, Stetson Engineers, and our firm. The District requests that this comment letter and the attached reference materials be included as part of the administrative record in this matter.

Refer to Comment Letter L4

The District was formed in 1959 under the Water Conservation District Law of 1931, Division 21, Section 74000 et seq. of the California Water Code as an Improvement District of the Santa Ynez River Water Conservation District for the purposes of furnishing water within the District's boundaries, and has operated continuously since 1959. The District functions as an Improvement District, which means it is an independent local governmental agency.

Located in the central portion of Santa Barbara County, the District serves the communities of Santa Ynez, Los Olivos, Ballard, the City of Solvang, the Tribe's Reservation and rural portions of the County. With a population of approximately 8,920 (excluding the City of Solvang), the District currently provides water directly to 2,608 municipal and industrial customers and including 110 agricultural customers.

Brownstein Hyatt Farber Schreck

Ryan A. Smith
Attorney at Law
202.747.0507 tel
202.296.7009 fax
rsmith@bhfs.com

October 18, 2013

Ms. Amy Dutschke, Director
Bureau of Indian Affairs - Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Re: Supplement Comments on the Land Consolidation and Acquisition Plan of the Santa Ynez Band of Chumash Indians/Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project Based on New Information

Dear Director Dutschke:

We are writing on behalf of Santa Ynez River Water Conservation District, Improvement District No. 1 (the "District") concerning the (1) Santa Ynez Band of Chumash Indians' (the "Tribe") Land Consolidation and Acquisition Plan ("LCAP") and (2) the Environmental Assessment (EA) prepared in connection with the LCAP for the for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project (the "Fee-To-Trust Application"). BIA approved the LCAP on June 17, 2013, and is currently considering the Tribe's Fee-To-Trust Application. On October 7, 2013, the District provided you with comments on the EA. Since the District's submission of its comments, new information has become available that directly impacts the EA. Accordingly, the District is submitting these supplemental comments on the EA to specifically address this new information.

Refer to Comment Letter L7

As discussed below, the underlying rationale for the EA is the Tribe's LCAP. Since the District filed its comments, the Tribe has withdrawn its LCAP. On October 11, 2013, the Tribal Chairman wrote to you stating that the Tribe "withdraw[s] without prejudice" the "Tribal Consolidation Area (TCA) application dated March 27, 2013 as approved on June 17, 2013." Enclosed with the letter is tribal Resolution #926A, dated October 9, 2013, in which the Tribal Business Committee resolves that the TCA Application be withdrawn and in which it authorizes the Tribe's Chairman "to negotiate, sign, and execute any and all documents required or necessary to implement such WITHDRAWAL WITHOUT PREJUDICE."

Comment Letter L19

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter L17.

PRIVATE CITIZENS AND COMMERCIAL ENTITIES (P)

COMMENT LETTERS

Comment Letter P1

Stand Up For California!

"Citizens making a difference"

www.standupca.org

Cheryl Schmit - Director
P. O. Box 355
Penryn, CA. 95663

FAX

DATE: **August 26, 2013** **Pages 2 including cover page**

Attn: Amy Dutschke Regional Director 916-978-6099

FROM: Cheryl Schmit PH: 916-663-3207 Fax: 916-663-1415
cherylschmit@att.net

Message:

Request for a 30 day extension.

Thank you

Cheryl

Reg Dir ✓
Dep Reg Dir
Reg Adm Ofcr
Route
Response Required
Due Date 9-3-13
Memo Ltr
File Other

Stand Up For California!
"Citizens making a difference"

P. O. Box 355
Penryn, CA. 95663

August 26, 2013

Amy Dutschke
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension

Dear Regional Director Dutschke,

I received via Fed X the Notice of Availability (NOA) and CD of the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians of Santa Barbara, on August 22, 2013. I note that the EA is some 900 pages in length and covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources and the list continues. These subject areas require comprehensive reading and thoughtful analysis in order to provide appropriate comment. Clearly, the Tribe and the Bureau of Indian Affairs have expended considerable time and effort to prepare and present this document. P1-01

Considering this fee to trust application is within our states first ever "Tribal Consolidation Plan Area" and encompasses more than 1400 acres of land, our organization request an extension of 30 days beyond the September 19th deadline in order to provide suitable comment. P1-02

The Bureau of Indian Affairs has a history of granting 30 days extension when fee to trust acquisitions are this extensive. *Stand Up For California!* would like to provide meaningful comment for your review and consideration. We await your timely response. Thank you for your consideration. P1-03

Sincerely,

Cheryl Schmit – Director
916 663 3207
cherylschmit@att.net

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

SY Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

1 message

Jonathan Paulson <jrp@jonathanpaulson.com> Tue, Aug 27, 2013 at 5:50 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

Dear Mr. Broussard,

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P2-01

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P2-02

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P2-03

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P2-04

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P2-05

Respectfully,

Jonathan Paulson

Comment Letters P3 through P7

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Extension

1 message

Pamela Zwehl-Burke <milkjug@me.com> Tue, Aug 27, 2013 at 6:52 PM
To: Chad.broussard@bia.gov
Cc: Pamela Zwehl-Burke <milkjug@mac.com>

Please extend the public comment phase in addressing the fee-to-trust proposal by the Chumash Indians. The environmental assessment is recently available for perusal and citizens need time to consider its ramifications. Thank you, Pamela Zwehl-Burke

P8-01

Comment Letters P9 and P10

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

fee to trust

1 message

Nancy Englander <nenglander1@gmail.com> Tue, Aug 27, 2013 at 8:01 PM
To: chad.broussard@bia.gov
Cc: info@polosyv.org

August 27, 2013

Dear Mr. Broussard.

I am writing regarding the Environmental Assessment that is part of fee-to-trust application filed by the Santa Ynez Band of Mission Chumash Indians for what we know as Camp-4, a 1400 acre property on Baseline Avenue between Happy Canyon and Edison. As I am sure you realize, the use of a property of this size has implications not only for the immediate neighbors but also for the greater community. Given the size of the area and the complexity of the Environmental Assessment (EA), I believe that we need more than 30 days to review and comment upon the application and therefore request that you consider a 60 day extension of the comment period--bringing it to 90 days. P11-01

I am also deeply troubled by the fact that once the land is taken into trust, there is no way to assure that the tribe's use of the land is consistent with their application and the EA – in other words, unless there is a way to build into the process restrictions on use of the land so that it must remain consistent with the EA, one has to question the validity of the EA. P11-02

Finally, the EA mentions a "Tribal Consolidation Area" (TCA). As I am sure you realize, this is an overlay that includes thousands of acres and hundreds of privately owned homes. I am not sure of the significance of this overlay, why it is mentioned in the EA and what the ramifications are. As far as I know, this is unprecedented and the implications are immense. As a neighboring property owner, I need to understand this overlay, what it means and how it relates to the EA, if at all. This takes time. P11-03

So it is my hope that you and your colleagues are willing to extend the comment period by an additional 60 days -- to allow the time for a thorough review of the EA and the issues it raises and to enable members of the community to intelligently comment, in the expectation that the needs and best interests of all of us are considered. P11-04

Sincerely yours,

Nancy Englander
6660 Happy Canyon Road
Santa Ynez

Comment Letters P12 and P13

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Comment Letter P14

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1,400 acre Santa Ynez Valley EA and fee-to-trust, TA Chumash proposal

1 message

Beth Horvath <horvath@westmont.edu> Wed, Aug 28, 2013 at 7:02 AM
To: Chad.broussard@bia.gov

Please see attached. Thank for your consideration.

BIA EA letter for extension.docx
146K

To: Mr. Broussard, Bureau of Indian Affairs

From: Concerned citizen of the Santa Ynez Valley in California

Date: August 28, 2013

RE: Santa Ynez Band of Mission Chumash Indians, 1,400-acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

Dear Mr. Broussard,

I am very concerned that you fully understand the impact that this 1,400-acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P14-01

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P14-02

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P14-03

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land that has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless. P14-04
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf

The significant and negative impact that the proposal submitted by the Chumash Band (note: Band, not Tribe) has for all of Santa Barbara County, and most particularly the other residents of the Santa Ynez Valley is VERY significant (and rather insidious). All people who live, work or visit, simply want to live in/enjoy a rural setting, and raise their children with safe access to the "out of doors." The severe P14-05

impact this proposal will have on future water supply and usage, and which will completely undermine the very carefully laid out valley community plan for further development and the essential agricultural usage that occurs in the valley, demands that there be time to fully review the proposed plan.

P14-05 (Cont.)

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered.

P14-06

Respectfully,

E. A. Horvath
Concerned valley resident
and college ecology professor

Comment Letters P15 through P18

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1400 Acres

1 message

Mike Shuler <mikersh2003@yahoo.com> Tue, Aug 27, 2013 at 9:28 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,

I am a long time resident of the Santa Ynez Valley. Moved here in 1974.

This is a wonderful Valley, and great place to live.

P19-01

Since the "Indians" opened the Chumash casino, and hotel, plus some of the other acquisitions in Solvang, the crime rate has gone up substantially.

P19-02

As a long term resident of the Santa Ynez Valley, I'm totally against the development of the 1400 acres that Fess Parker sold.

P19-03

Many issues are at stake, water, roads, and in general the fact they are trying to become a "sovereign" nation status?

P19-04

This is ridiculous! Why should the "Indians" be allowed to pay no property, and other taxes, when they like us live in a beautiful area, and some have become filthy rich because of gambling, which I personally feel is ridden by crime, similar to when prohibition was run by the Mafia.

I would be glad to expand further, please take this note as my personal feeling. I am not connected with any citizens group against the expansion of the acres in question.

P19-05

Sincerely,

Mike Shuler

Mike Shuler
Mikersh 2003@yahoo..com
Cell- (805) 350-0063

Comment Letters P20 through P22

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1400 acre "Camp 4" lands of the Santa Ynez Valley

1 message

ttgorham@aol.com <ttgorham@aol.com> Wed, Aug 28, 2013 at 10:11 AM
To: Chad.broussard@bia.gov
Cc: dfarr@countyofsb.org

Dear Mr. Broussard,

My wife and I own a home in the Happy Canyon area adjacent to the lands described above. The Chumash Indians are attempting to transfer this land in the "Fee to Trust" process to their reservation. This would have serious negative environmental impact to the area including the impact to the water supply by increased usage, traffic and the overall pristine environment of the area. We in the Valley have already seen the development impact the Chumash have already done on their present lands with casinos, gas stations and other development projects. Please consider the many hundreds of good citizens in the Valley and how they will be negatively impacted by allowing the Chumash to transfer Camp 4 lands into their reservation and avoid County development restrictions. P23-01 P23-02 P23-03

We are the people that would be impacted by your decisions. Please consider our side of the story.

Sincerely,

Tim Gorham
5285 Baseline Rd
Santa Ynez, Ca 93460

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment, Santa Ynez Band of Chumash Indians 1400 acre fee-to-trust application

1 message

Bill Krauch <billkrauch@aol.com> Wed, Aug 28, 2013 at 10:32 AM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr.Broussard,
As a bordering property owner to the 1400 acres I hereby request a 60 day extension of the comment period on the recently released Environmental Assessment for the following reasons:

This document was probably in preparation for one year and it is difficult to thoroughly study in less than 30 days. P24-01

The 1400 acres is the size of one of the largest cities in the valley, Solvang, and if approved as requested would have many adverse impacts upon the community. P24-02

The inclusion of the Tribal Consolidation Area needs extensive legal research. P24-03

Please extend the review period by 60 days. P24-04

Respectfully,

Bill Krauch

Sent from my iPad

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Please extend the Comment Period on the Environmental Assessment for Chumash application

MESSAGE

Kyle Abello <kabello@ucsd.edu> Wed, Aug 28, 2013 at 11:51 AM
To: Chad.broussard@bia.gov

Re: Santa Ynez Band of Mission Chumash Indians, 1400 acre fee-to-trust application, Environmental Assessment

Dear Mr. Broussard,

I am a resident of the Santa Ynez Valley and neighbor of the Chumash Tribe and just became aware of the pending Environmental Assessment for their 1400 acre fee-to-trust application in rural Santa Ynez. Please extend the comment period so the many people like me who have just found out about this application and who would be profoundly affected by the development of this agriculturally zoned property can adequately review the Environmental Assessment. P25-01 P25-02

The sheer size of the proposed area is larger than the largest City, Solvang, in the Santa Ynez Valley, and the complexity of the document demands more time to review, especially since there is reference to even more land that the Tribe would like to take into trust (the TCA map shown in the Environmental Assessment). P25-03

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment and make sure that all of the affected residents of our Valley and County are able to comment. P25-04

Sincerely,
Kyle Abello
Solvang

Comment Letter P26

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

1 message

hiddenlakeranch@earthlink.net <hiddenlakeranch@earthlink.net> Wed, Aug 28, 2013 at 11:59 AM
Reply-To: hiddenlakeranch@earthlink.net
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

RE: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

Dear Mr. Broussard,

The impact that this 1,400 acre fee-to-trust application will have on my home of 33 years, which back up to this 1400 acres and the rest of the communities in Santa Barbara County is why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P26-01

The EA includes and references the Tribal Consolidation Area. This is an overlay that includes my home. As a property owner that both borders the 1400 acres and is with in the Tribal Consolidation Area I must have the time to research the TCA, and how it relates to the EA. P26-02

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P26-03

Respectfully,
Caryn Cantella
1551 Linda Vista Dr.
Santa Ynez, CA

Comment Letter P27

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P28

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P25.

Comment Letter P29

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

RE: Request for an Extension

1 message

Ginny Burroughs <gindog562000@yahoo.com> Wed, Aug 28, 2013 at 12:32 PM
Reply-To: Ginny Burroughs <gindog562000@yahoo.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: "info@syvconcernedcitizens.com" <info@syvconcernedcitizens.com>

August 28, 2013

RE: Request for an Extension

Dear Mr. Broussard,

I note that the EA is some 900 pages in length and covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources and the list continues. These subject areas require comprehensive reading and thoughtful analysis in order to provide appropriate comment. Clearly, the Tribe and the Bureau of Indian Affairs have expended considerable time and effort to prepare and present this document. P29-01

Considering this fee to trust application is within our state's first ever "Tribal Consolidation Plan Area" and encompasses more than 1400 acres of land, I am requesting an extension of 60 days beyond the September 19th deadline in order to provide suitable comment. The Bureau of Indian Affairs has a history of granting extension when fee to trust acquisitions are this extensive. P29-02

I live close to the Camp 4 property, and am very concerned about P29-03

the negative consequences of its annexation by the BIA. Camp 4 would effectively be removed from County and Santa Ynez Valley juristiction if annexation is accomplished. With no restrictions on this land's use, the value of my home, as well as the quality of living there would almost certainly diminish. I have already experienced increased light pollution, traffic, and noise from the existing casino.

Thank you for your consideration.

P29-03 (Cont.)

P29-04

P29-05

P29-06

Sincerely,

Virginia Burroughs
1185 Mustang Drive
Santa Ynez, ca 93460
805 688-6836
gindog321@verizon.net
Cheryl Schmit – Director
916 663 3207
cherylschmit@att.net

Comment Letter P30

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Tribal Consolidation Plan/Environmental Assessment deadline extension request

1 message

Michelle de Werd <michelle@dewerdfamily.com> Wed, Aug 28, 2013 at 12:52 PM
To: chad.broussard@bia.gov

Dear Mr. Broussard,

I write to urge you to give our community more time to evaluate the dramatic impact that the Chumash's Tribal Consolidation and Acquisition Plan will have on our town. This Plan was recently approved by the BIA on June 7th with no public notification. I believe our government should provide us with more transparency. P30-01

This Plan will have considerable impact on water and funding for our public schools and public safety. P30-02

I urge you to please allow for an extension of the September 19th deadline so we may review the 900 page application to comprehend the representations made in the Environmental Assessment. P30-03

I look forward to your response even if it is just to let me know you have received this email. P30-04

Best regards,

Michelle de Werd

Michelle de Werd

P.O. Box 277

3345 Foxen Canyon Road

Los Olivos, CA 934414-0277

Home: 805-688-0553

Mobile: 805-350-0300

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

EA for Santa Ynez Band of Mission Indians,Chumash

1 message

LINDA KASTNER <lkast6945@aol.com> Wed, Aug 28, 2013 at 12:57 PM
To: Chad.broussard@bia.gov

Dear Mr. Broussard,

Thank you so much for your time today on the phone.

As I said, I received a copy of the 930 page Environmental Assessment (EA) regarding the Santa Ynez Band of Mission Indians,Chumash,request to the BIA to take approximately 1400 acres of land in the Santa Ynez Valley from fee to trust. P31-01

There is reference in the EA to a Tribal Consolidation Area, TCA, which was approved in June by the BIA that profoundly affects all who own property in the Santa Ynez Valley.We residents and the Santa Barbara County Supervisors were never made aware of this document until the application by the Tribe was made to the BIA. P31-02

I,and my attorney, need more time to digest this TCA and the Environmental Assessment.

I am asking, for a extension of the comment period on this Environmental Assessment. A 60 day extension should be enough for us to read this 930 page Assessment and the TCA and fully understand its impacts. P31-03

Thank you so very much,
Linda and Sid Kastner
PO Box 402
Santa Ynez CA.93460
805-895-6343
lkast6945@aol.com

Linda Kastner

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Extension for Environmental Assessment Fee to Trust

1 message

Mary Jane Edalatpour <mjmcrthre@aol.com> Wed, Aug 28, 2013 at 1:09 PM
To: Chad.broussard@bia.gov

Please extend comment period for the fee to trust in Santa Ynez Valley for at least 60 days. More time needed to fairly represent the community at large. P32-01

Mary Jane Edalatpour
8615 Santa Rosa Road
Buellton CA 93427
805 688-1017
949 683-6287 cell
maryjaneedalatpour@me.com

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Tribal Consolidation & Acquisition Plan

1 message

Tucker <tuctip@comcast.net> Wed, Aug 28, 2013 at 1:29 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

Sirs:

We are concerned that the Bureau of Indian Affairs is considering annexation of properties under discussion to the Chumash tribe in the Santa Ynez Valley. Further, the Tribal Consolidation & Acquisition Plan, included in the application, goes against the Santa Ynez Valley Community Plan. P33-01

Our concerns remain:

1. Impact on the communities in the Santa Ynez Valley,
   ie: police, fire, emergency agencies and services
   increased traffic on congested highways
   devaluation of properties in the valley
   use of water supplies
   impact on ranches that have long been a part of our communities
   impact on local businesses
   lost tax monies P33-02
2. Legitimacy of the tribe, its members, and, therefore, its rights P33-03

We consider that the seriousness of the Chumash requests and the lack of public notification, makes it imperative that the public have an extended time to absorb the impacts of these issues and to format relevant comment. P33-04

We respectfully request a 60-day extension of the review period.

Robert P. and Ann Tucker
253 Alisal Road
Solvang, CA 93463

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

request 60-day extension

1 message

Michael/Mary Jane Delgado <mmjdelgado@comcast.net> Wed, Aug 28, 2013 at 1:34 PM
To: chad.broussard@bia.gov

Dear Mr. Broussard,

I am writing to strongly request 60-day extension of comment period to give me enough time to understand the 930-page long FTT application, and these are the reasons:

1. The Environmental Assessment submitted by the tribe in connection with its Fee-To-Trust application is 930 pages long. More than 30 days are needed to read, verify and evaluate the representations made in the EA before relevant comment can be articulated. P34-01
2. On June 7, 2013 the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 plus approximately 10,000 additional acres, with no notice to the community, governing bodies or private landowners who own land inside the TCA. The community needs additional time to determine options for action that can be taken to protect property owners, both inside and adjacent to the TCA. P34-02
3. The action by the BIA in approving the TCA is unprecedented and needs to be evaluated, particularly as there was no public notice given of this action. P34-03
4. The TCA's impact is inconsistent with the County Board of Supervisors-adopted Santa Ynez Valley Community Plan and needs to be evaluated. P34-04
5. The over-reaching of the BIA in approving the TCA has the legal effect of an inverse condemnation (a 'taking') for the properties inside and adjacent to the TCA. P34-05
6. The TCA incorporates property with an estimated aggregate value in the billions of dollars. The tax consequences to the state, county and local governments are astronomical and need to be evaluated. P34-06
7. Real properties in escrow in the area prior to the disclosure of the BIA's TCA approval have now fallen out of escrow. Realtors in the area need more time to evaluate these impacts. P34-07
8. There is a cloud on the title of all properties owned inside and adjacent to the TCA. P34-08

P34-09

Thank you for your service,
Mary Jane West-Delgado
Santa Ynez

Comment Letters P35 through P37

Comment Letter P35

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letters P36 and P37

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P1.

Broussard, Chad <chad.broussard@bia.gov>

Chusmash TCA designation - request for extension of comment period, if not outright reversal of request.

1 message

Rob Walton <rob.walton.consulting@gmail.com> Wed, Aug 28, 2013 at 2:08 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com, robyn.walton@gmail.com, feedback@ios.doi.gov

Rob Walton
305 White Oak Road
Santa Ynez, CA 93460

Voice: 805-722-0693
email: rob.walton.consulting@gmail.com

Dear Mr. Broussard,

As a property owner living within the Chumash effected area, which the BIA has decided to confirm as a Tribal Acquisition Area, I protest this designation and also demand an extension of the thirty-day comment period. P38-01

The TCA designation is typically applied to property that has ALREADY been acquired by a tribe, not property that belongs to private owners. Such as designation can negatively effect my property values, and has no business being applied to private lands. P38-02

The existing property that the Chumash are requesting a Fee-to-Trust designation is almost ten times (!!) their existing land. They wish to remove that land and other future acquisitions in the area from tax roles and any sort of local oversight and planning. P38-03

This is not appropriate, we all object, and I am writing every representative in the area. This is not right. It is not fair, and it is clear how the power of Indian casino money is influencing decisions that affect the local populace. P38-04

This TCA plan reflects how out of control the BIA and the tribal governments are. P38-05

There exists an insidious creeping of favoritism towards the native americans, over lands which are not even in their possession. P38-06

The expansion of tribal influences is not only inappropriate but is scary. Casinos are being built on out stationed lands that are not contiguous with tribal property. This is wrong and the BIA appears complicit. P38-07

1. The Environmental Assessment submitted by the tribe in connection with its Fee-To-Trust application is 930 pages long. More than 30 days are needed to read, verify and evaluate the representations made in the EA before relevant comment can be articulated. P38-08
2. On June 7, 2013 the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 plus approximately 10,000 additional acres, with no notice to P38-09

the community, governing bodies or private landowners who own land inside the TCA. The community needs additional time to determine options for action that can be taken to protect property owners, both inside and adjacent to the TCA. P38-09 (Cont.)

3. The action by the BIA in approving the TCA is unprecedented and needs to be evaluated, particularly as there was no public notice given of this action. P38-10
4. The TCA's impact is inconsistent with the County Board of Supervisors-adopted Santa Ynez Valley Community Plan and needs to be evaluated. P38-11
5. The over-reaching of the BIA in approving the TCA has the legal effect of an inverse condemnation (a 'taking') for the properties inside and adjacent to the TCA. P38-12
6. The TCA incorporates property with an estimated aggregate value in the billions of dollars. The tax consequences to the state, county and local governments are astronomical and need to be evaluated. P38-13
7. Real properties in escrow in the area prior to the disclosure of the BIA's TCA approval have now fallen out of escrow. Realtors in the area need more time to evaluate these impacts. P38-14
8. There is a cloud on the title of all properties owned inside and adjacent to the TCA. P38-15

As an effected individual, I am requesting the reversal of TCA or at minimum an extension of the comment time. P38-16

Sincerely, Robert Walton

Comment Letters P39 and P40

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Comment Letter P41

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash fee-to-trust EA...extend the time

1 message

Jordan Mo <jordanmo@verizon.net> Wed, Aug 28, 2013 at 2:33 PM
To: Chad.broussard@bia.gov

It may be unfair that various Indian Nations have been very badly treated in the past; it is also unfair to place the burden of reparation on only a few present day citizens. P41-01

We want to add our voices to those of the many, many of our community that deeply resent having our property rights violated by a distant bureaucracy. P41-02

Our former neighbor, a Chumash tribal member, received her monthly "stipend" from Casino earnings of $30,000/month. We all got on well, and we had no objection to her wealth. We do object to losing our homes to Washington politics. P41-03

At least give us another 60 days to study the EA and evaluate our situation. P41-04

Jordan Mo & Janet I. Hines
753 Hillside Drive
Solvang, CA 93463

Broussard, Chad <chad.broussard@bia.gov>

FW: vote no on annexation

1 message

Susie Snow <ssnow@uclabruins.net> Wed, Aug 28, 2013 at 2:54 PM
To: chad.broussard@bia.gov

From: Susie Snow [mailto:ssnow@uclabruins.net]
Sent: Monday, August 12, 2013 2:26 PM
To: 'sbcob@co.santa-barbara.ca.us'
Subject: vote no on annexation

August 12, 2013

Chad Broussard, Environmental Protection Specialist

Dept. of the Interior, Bureau of Indian Affairs

Pacific Regional Office, Suite 2820

2800 Cottage Way

Sacramento, CA 95825

Santa Barbara County Board of Supervisors

We need your help!

We are writing regarding the possible annexation of additional land to the Santa Ynez Valley Chumash Reservation. With the income from their

P42-01

gaming casino the approximate 150 members are now able to buy any property in the valley, for which we are very happy for them. According to the news releases the Tribe wants to annex any land they buy to the Reservation thus removing it from any State and County restrictions. We feel this is wrong and that they should be required to follow the same ordinance laws and zoning that we all have to follow.

P42-01 (Cont.)

P42-02

We are afraid if you approve this annexation that a precedent will be set allowing the use of this "loop hole" to bring their massive development to an area zoned agricultural and our beautiful rural valley will be changed forever. To give 150 people or anyone the right to do this is wrong.

P42-03

P42-04

We are sure this letter is mild compared to some you will be getting but the request is the same.....Save our rural paradise.

P42-05

PLEASE vote NO on any land annexation to the Chumash Reservation

Sincerely,

Susie Snow, Pat Wall and Jean Wall

285 Meadowlark Road Santa Ynez, California 93460 Ph. 805 688-0486

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Fee to Trust App Comment Period Extension

1 message

Karas Kenneth <kenkarast28@gmail.com> Wed, Aug 28, 2013 at 3:21 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

Mr. Broussard,

Pls find attached a letter requesting an extension of the comment period related to the Chumash's fee-to-trust application in Santa Ynez.

Thank you.

Ken Karas

Chumash Ltr to BIA026.pdf
139K

4500 Via Rancheros Road
Santa Ynez, CA 93460
kenkarast28@gmail.com

August 26, 2013

Ms. Amy Dutschke
Regional Director
Bureau of Indian Affairs
United States Department of the Interior
2800 Cottage Way,
Sacramento, CA 95825

RE: Request for an Extension re Chumash Indian Tribe, Santa Ynez, CA

Dear Regional Director Dutschke:

We just learned that the Chumash Indian Tribe in Santa Ynez, CA submitted to the Bureau of Indian Affairs (BIA) a "Fee-to-trust" application to annex a piece of property in our community known as "Camp 4", and that the comment period ends on September 19, a mere 23 days from now. The Environmental Assessment associated with this application is over 900 pages in length and covers significant issues such as land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resource and more. These subject areas require comprehensive reading and thoughtful analysis in order to provide appropriate comment. Clearly, the Tribe and the Bureau of Indian Affairs have expended considerable time and effort to prepare and present this document and we need adequate time to consider it.

P43-01

Given the magnitude of this application and its potential impact on our community, we are requesting an extension of 60 days beyond the September 19th deadline in order to provide suitable comment.

Thank you for your consideration

Sincerely,

Kenneth C. Karas

Comment Letter P44

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment - Extension Request

1 message

kelly rose <kelly.rose1@verizon.net> Wed, Aug 28, 2013 at 3:26 PM
Reply-To: kelly rose <kelly.rose1@verizon.net>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,

I am a resident and property owner in the Santa Ynez Valley. We operate a horse ranch which is located near the 1,400 acres owned in fee by the Santa Ynez Band of Chumash Indians. I was made aware of an Environmental Assessment submitted in August 2013 by the Chumash to the Bureau of Indian Affairs in connection with a request for transfer of this property from fee to trust. I also understand that the comment period established by the BIA ends September 15, 2013. Additionally, I am sure you know that the Environmental Assessment is more than 900 pages long. P45-01 P45-02

The Environmental Assessment Document, the proposed Fee to Trust request, and the information regarding the Tribal Consolidation Area personally impact me, my family and the value and future of our property. For example, Proposal A provides for 200+ acres of open space and Proposal B provides for nearly 800 acres of open space. Both 200 acres and 800 acres are substantial in size and would allow substantial future development which would not be restricted once the property was transferred to trust. Also, any future development would make all of the information and plans regarding water use, disposal of waste water, traffic and other impacts irrelevant and useless. It would be worse than comparing apples to oranges - - it would be comparing apples to elephants. P45-03

I am requesting an extension of at least 90 days so that my wife, my attorney and I can understand what is in these 900+ pages that directly impact us, our property, our livelihood, our direct environment and our quality of live so that we can respond intelligently with our concerns. P45-04

Thank you for your objective assessment of my request for a extension of the comment period.

Kelly and Sandy Rose

Comment Letter P46

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band Of Chumash Indians fee to trust

1 message

wendye950@aol.com <wendye950@aol.com> Wed, Aug 28, 2013 at 4:03 PM
To: Chad.broussard@bia.gov, info@polosyv.org, "info "@concernedcitizens.com, wendye950@aol.com

Dear Mr Broussard,

Please understand the impact that the 1,400 acre fee -to -trust application of the Santa Ynez Band of
Chumash Indians will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment. P47-01

The Environmental Assessment submitted by the Tribe is 930 pages long. More than 30 days are needed
to read, verify and evaluate this application. P47-02

In addition, the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 ,
1,400 acre site PLUS approximately 10,000 additional acres, with no notice to the community. P47-03

Because of the size of the area , the 1400 acres site equal to one of the largest cities in the Santa Ynez Valley,
Solvang, and the great complexity of the EA, the County and our community need a minimum of 60 days to review the application. P47-04

Because the Department of the Interior does not impose restrictions on a tribe's future use of land taken into trust,
the consequences to our communities, our way of life, needs immediate attention. P47-05

Please heed our concerns .
Respectfully,
Wendy L. Eisler

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Request for Extension for Review of Chumash Fee to Trust Action

1 message

MCHUGH HAROLD <mchughhr@yahoo.com> Wed, Aug 28, 2013 at 9:05 PM
Reply-To: MCHUGH HAROLD <mchughhr@yahoo.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: Mike Hadley <mhadley@silcom.com>, "info@syvconcernedcitizens.com" <info@syvconcernedcitizens.com>

Mr. Broussard:

There has been no public review of the Chumash Tribe Fee to Trust action. The property rights of people residing in the Santa Ynez Valley will be adversely affected by this action. The tribal members each have a monthly income exceeding $45,000. They presently have property rights equal to all other valley residents and should not be exempt from state and local zoning and land use regulations. They already operate a large gambling casino in the Santa Ynez Valley that adversely impacts everyone who lives here. Another large gambling enterprise would ruin the rural aspects of this valley and destroy our property values. P48-01 P48-02 P48-03 P48-04

Please delay your action until the residents of the Santa Ynez Valley can express their concerns about the fee to Trust action. P48-05

Thank you for your time and consideration,

Harold McHugh

Broussard, Chad <chad.broussard@bia.gov>

Chumash Camp 4 Fee-to-Trust Review and the TCA

1 message

Gary Waples <gary.waples@gmail.com> Wed, Aug 28, 2013 at 9:23 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com, SupervisorCarbajal@sbcbos1.org, jwolf@sbcbos2.org, dfarr@countyofsb.org, peter.adam@countyofsb.org, steve.lavagnino@countyofsb.org

Mr. Broussard,

First, I would like to protest the way the TCA was thrust upon the people who live in the Santa Ynez Valley. No notice, no time to appeal or even comment and it gets approved. That was and is a very deceitful and sneaky way to get things done. P49-01

Now, as to the Camp 4 Fee-to-Trust Review, please extend the length of the review process by at least another 60 days so that competent people can review and analyze the impacts of removing the land from the United States of America and placing it under the control of a different nation. P49-02

Even if an extension is granted, I have read the law review report published by Pepperdine Law School that shows that in the past decade or so, 100% of all application to the Fee-to-Trust process in the Western states have been approved. P49-03

Regardless, please do grant an extension. P49-04

Sincerely,

Gary E. Waples
3063 Horizon Drive
Santa Ynez, CA 93460

Comment Letter P50

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Land Consolidation

1 message

Jon Quirt <jonquirt@gmail.com> Thu, Aug 29, 2013 at 6:49 AM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

Mr. Broussard,

I am writing to request that you extend the public comment period from 30 days to 60 days. P51-01

I just acquired a home in Santa Ynez Valley within the Consolidation area.

Had this Consolidation Plan been conducted in an open, rather than the secret manner it was, I may not have purchased property within the consolidation area. P51-02

This has had an immediate effect of reducing my property value and is causing me hardship with the uncertainty it produces as to the future disposition of my property. P51-03

Thank you for your consideration.

Sincerely,

Jon Quirt
195 Meadowlark Road
Santa Ynez, CA

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Extension of Comment period

1 message

Tami Bollay <tami@bollay.com> Thu, Aug 29, 2013 at 7:19 AM
To: chad.broussard@bia.gov
Cc: info@syconcernedcitizens.com

Dear Sir:

We are requesting a 60-day extension of the public comment period regarding the application for the Chumash Tribal Consolidation Plan plus Camp 4 Annexation Application. P52-01

This document was NOT DISCLOSED TO THE PRIVATE PROPERTY HOLDERS until recently! P52-02

1. The Environmental Assessment submitted by the tribe in connection with its Fee-To-Trust application is 930 pages long. More than 30 days are needed to read, verify and evaluate the representations made in the EA before relevant comment can be articulated. P52-03
2. On June 7, 2013 the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 plus approximately 10,000 additional acres, with no notice to the community, governing bodies or private landowners who own land inside the TCA. The community needs additional time to determine options for action that can be taken to protect property owners, both inside and adjacent to the TCA. P52-04
3. The action by the BIA in approving the TCA is unprecedented and needs to be evaluated, particularly as there was no public notice given of this action. P52-05
4. The TCA's impact is inconsistent with the County Board of Supervisors-adopted Santa Ynez Valley Community Plan and needs to be evaluated. P52-06
5. The over-reaching of the BIA in approving the TCA has the legal effect of an inverse condemnation (a 'taking') for the properties inside and adjacent to the TCA. P52-07
6. The TCA incorporates property with an estimated aggregate value in the billions of dollars. The tax consequences to the state, county and local governments are astronomical and need to be evaluated. P52-08
7. Real properties in escrow in the area prior to the disclosure of the BIA's TCA approval have now fallen out of escrow. Realtors in the area need more time to evaluate these impacts. P52-09
8. There is a cloud on the title of all properties owned inside and adjacent to the TCA. P52-10

Santa Ynez residents agree that this maneuver at the hands of the Federal Government constitutes a taking of our private properties and clearly is a step towards wiping out the United States Constitution and Bill of Rights, while pitting one ethnic group against another. Look no further than the Middle East to understand the end result of class and ethnic injustices to find the result of actions such as this. Shame on you for harming good citizens and neighbors, while sowing the seeds of hatred. Your are not American and should be tried in Federal Court for P52-11

acts of war against private citizens.

P52-11
(Cont.)

Regards,

Tami & Denison Bollay

162 White Oak Road
Santa Ynez, CA 93460

Comment Letters P53 through P61

Comment Letter P53

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

Comment Letters P54 through P60

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Comment Letter P61

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Extension for Notice & Public Comment - Santa Ynez Valley TCA

1 message

SJBol4444@aol.com <SJBol4444@aol.com> Thu, Aug 29, 2013 at 11:06 AM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

chad.broussard@bia.gov

To Whom It May Concern:

Please grant an extension of sixty - ninety days for the normal public comment period regarding the "TCA" for the Santa Ynez Valley (CA) promoted by the local Chumash Tribe. P62-01

The Valley Public has had little or no notice or time to consider and comment on the impacts of this unprecedented action and procedure. P62-02

Respectfully,

Steve & Bonnie Bollinger
4062 Paseo Poco
Santa Ynez, CA 93460

sjbol4444@aol.com

Comment Letters P63 through P67

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

1400 acres in Santa Ynez Valley

1 message

Mark C. Rick, DVM <mrick@alamopintado.com> Thu, Aug 29, 2013 at 12:20 PM
To: Chad.broussard@bia.gov

Dear Mr. Broussard:

Please strongly consider the rights of the concerned citizens of the Santa Ynez Valley to review the documents before allowing "fee to trust" of the 1400 acres that that Chumash Tribal Nation wishes to annex. This small rural valley needs to be very careful of any changes of this magnitude and we need plenty of time to review and evaluate the documents. A 30-day period is simply not long enough for this to occur. Taking this entire property off tax roles and out of any oversight or jurisdiction could potentially destroy this area which is known for its raw natural beauty, rural character, vineyards, horse farms and robust restrictions on development without adequate and open public input. We need to move slowly and with care and concern on this complex issue. Thank you. P68-01 P68-02

Mark C. Rick

BISON CONNECT

Broussard, Chad <chad_broussard@bia.gov>

August 29, 2013 Letter to Chad Broussard, Environmental Protection, BIA

1 message

Carol Herrera <wcarol@gmail.com> Thu, Aug 29, 2013 at 12:22 PM
To: chad.broussard@bia.gov, Doreen Farr <dfarr@countyofsb.org>, "Farnum, Elizabeth" <efarnum@countyofsb.org>, Lois Capps <lois.capps@mail.house.gov>

8/29/13

TO: Chad Broussard, Environmental Protection Specialist
Department of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Sacramento, California

RE: **REQUEST DEADLINE EXTENSION: Fee to Trust Application by Santa Ynez Band of Mission (Chumash) Indians** for 1,400 acre Camp4 and Tribal Consolidation and Acquisition Plan.

Dear Sir:

I am writing in response to the Fee to Trust application submitted by the Santa Ynez Band of Mission (Chumash) Indians. You have given 30 days with a September 19, 2013 deadline to comment on the document. In order to carefully review the Environmental Assessment and the Tribal Consolidation and Acquisition Plan properly, I am requesting that you extend the deadline by 60 days for the following reasons. P69-01

The multiple concerns of the community and local government of the Santa Ynez Valley in addressing the environmental and economic impacts will take time to properly formulate. What is known at the present, is that both the 1,400 acres in this fee to trust application and the inclusion of the Tribal Consolidation and Acquisition Plan totaling 11,000 acres is unprecedented. P69-02

Up to now, California communities impacted by fee to trust have thrown up their hands in resignation and been unable to stem the tide of the inevitable gambling expansion by tribe's circumventing community land use policy. More than likely this application and the TCA included will be the "straw that broke the camel's back". P69-03

My property's title is now under a cloud since it is within the so called Tribal Consolidation and Acquisition Plan area. Neither I nor my neighbors will stand by and allow environmental and economic harm to our private properties or to our rural environmentally sensitive community. Through improper process and lenient interpretation of your own rules, the BIA's Pacific Regional Office has approved a mapped out area of Santa Barbara County for a special purpose. The stated purpose is to consolidate the Tribe's land base to an eventual 11,000 plus acres. This will be met with strong legal response and action from Santa Barbara County, private property owners and community organizations within the County. P69-04

In order for our family to address the multiple impacts and defend our home, environment and community, I respectfully request that the deadline to respond be extended for at least 60 days. P69-05

Thank you,

Carol Ann Herrera

Vista Verde Ranch
3900 Skylark Road
Santa Ynez, CA 93460
805-680-2225

wcarol@gmail.com

Comment Letter P70

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Request for extension of Environmental Assessment

1 message

Lee and George Weir <leeandgeorgeweir@verizon.net> Thu, Aug 29, 2013 at 12:35 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

Re: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, Environmental Assessment

Dear Mr.Broussard,

As a 36 year resident of the Santa Ynez Valley in California, I ask you to please extend the comment period by 60 days on the recently released above mentioned Environmental Assessment (EA). Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension. P70-01

The size of the area, the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P70-02

The EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have more time to research the TCA, and how it relates to the EA. P70-03

My husband and I were supporters of the Chumash when they wanted to build their first casino. I work at the local hospital and saw many tribal members with no insurance or only Medi-Cal come into our Emergency Department or be admitted to the hospital with no insurance and no primary care physician. I thought it would be good for them to have enough money to have health insurance for their members and a better standard of living.

Well....watch out what you wish for. They have made so much money in their casino that I no longer support them, as their objective seems to be to change the way the rest of their neighbors (myself and the other residents of the Santa Ynez Valley) live. P70-04

They have enough money to build houses on the 1,400 acres, after going through the same process any other builder needs to go through in Santa Barbara County. Unfortunately, they are not willing to do that, but instead want to control the 1,400 completely by the fee-to-trust process. They have hired very expensive lawyers (more expensive that us SY Valley Residents can afford) and are "hell bent" on getting their way. P70-05 P70-06

Thank you for listening and hopefully granting the 60 day extension. P70-07

Sincerely,

Lee and George Weir
leeandgeorgeweir@verizon.net

Broussard, Chad <chad.broussard@bia.gov>

Chumash Fee to Trust Application

1 message

Steve Raftopoulos <steveraftopoulos@me.com> Thu, Aug 29, 2013 at 1:52 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

Chad Broussard, Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Broussard,

I am writing to respectfully ask that you extend the public comment period for the Chumash fee to trust application by a meaningful time period of no less than 90 days, and hopefully more. Due to its size, particular location, and the history of the Chumash tribe in this community, this will be, by far, the most public, and most controversial fee to trust process ever undertaken by the BIA/DOI. P71-01

The opposition to this transfer is particularly deep and broad. Santa Barbara and Santa Ynez are recognized nationally and internationally for their natural beauty, and as a world class equestrian center and wine market. Due to the demographics our communities, which attracts full-time and part-time property owners from far reaching places this fee to trust action will have a broader impact than normal as it affects people with roots in many other locales around the country and world. Accordingly, this process will receive significant media attention and scrutiny at both the state and national level. P71-02 P71-03

As you are aware, the sheer size of the application is daunting. A thirty day comment period is woefully inadequate for our community and legal advisors to digest the application and impacts and to appropriately react. In fact, a thirty day comment period seems expressly designed to prevent us from doing that. P71-04

Sincerely,

Steve Raftopoulos
917 747 2225

Comment Letter P72

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P73

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

URGENT ATTENTION: Request for Extension

Nancy Eklund Hunsicker <fairoakfarm@hughes.net> Thu, Aug 29, 2013 at 3:47 PM
To: chad.broussard@bia.gov

Chad Broussard

Environmental Protection Specialist

Department of the Interior, Bureau of Indian Affairs

Pacific Regional Office, Suite 2820

2800 Cottage Way

Sacramento, CA 95825

Chad.Broussard@bia.gov

29 August 2013

RE: Request for Extension

Dear Mr Broussard,

With respect to the recent Fee to Trust Application, TCA Plan and Environmental Assessment filed by the Chumash Tribe in Santa Ynez Valley: We note that the EA is some 900 pages in length and covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources and the list continues. These subject areas require comprehensive reading and thoughtful analysis in order to provide appropriate comment. Clearly, the Tribe and the Bureau of Indian Affairs have expended considerable time and effort to prepare and present this document. P74-01

Additional points for consideration include:

1. The Environmental Assessment submitted by the tribe in connection with its Fee-To-Trust application is 930 pages long. More than 30 days are needed to read, verify and evaluate the representations made in the EA before relevant comment can be articulated. P74-02

2. On June 7, 2013 the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 P74-03

plus approximately 10,000 additional acres, with no notice to the community, governing bodies or private landowners who own land inside the TCA. The community needs additional time to determine options for action that can be taken to protect property owners, both inside and adjacent to the TCA. P74-03 (Cont.)

3. The action by the BIA in approving the TCA is unprecedented and needs to be evaluated, ***particularly as there was no public notice given of this action***. P74-04

4. The TCA's impact is inconsistent with the County Board of Supervisors-adopted Santa Ynez Valley Community Plan and needs to be evaluated. P74-05

5. **The over-reaching of the BIA in approving the TCA has the legal effect of an inverse condemnation (a 'taking') for the properties inside and adjacent to the TCA.** P74-06

6. **The TCA incorporates property with an estimated aggregate value in the billions of dollars. The tax consequences to the state, county and local governments are astronomical and need to be evaluated.** P74-07

7. **Real properties in escrow in the area prior to the disclosure of the BIA's TCA approval have now fallen out of escrow.** Realtors in the area need more time to evaluate these impacts. P74-08

8. **There is a cloud on the title of all properties owned inside and adjacent to the TCA** P74-09

Considering this fee to trust application is within our state's first ever "Tribal Consolidation Plan Area" and encompasses more than 1400 acres of land, we request an extension of 60 days beyond the September 19th deadline in order to provide suitable comment. P74-10

The Bureau of Indian Affairs has a history of granting extensions when fee to trust acquisitions are this extensive. We would like the opportunity to provide meaningful comment for your review and consideration, and await your timely response. Thank you for your consideration. P74-11

Sincerely,

David L Hunsicker

Nancy Eklund Hunsicker

1340 Quail Ridge Rd.

Solvang, CA 93463

fairoakfarm@hughes.net

dlhunsicker@hughes.net

805.688.2851

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Request Extension on Camp 4 EIA public comments

1 message

Michele Hinnrichs <micheleh@patinc.com> Thu, Aug 29, 2013 at 3:53 PM
To: chad.broussard@bia.gov
Cc: info@syvconcernedcitizens.com

Chad Broussard

Please find attached my request for an extension to the public comment period for the Camp 4 EIA an additional 60 days. P75-01

Michele

Michele Hinnrichs

CEO/Founder

Pacific Advanced Technology

Gas Imaging Technology wholly owned subsidiary

2029 Village Lane, Suite 102

PO Box 140

Solvang, CA 93464-0140

805 693-4012 Direct

805 688-2088

www.gitint.com

Camp 4 ERA Review Delay Request.pdf
184K

Michele Hinnrichs

August 29, 2013

Amy Dutschke
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension for the Fee to Trust Application Environmental Assessment for Camp 4 in the Santa Ynez Valley

Dear Regional Director Dutschke,

I understand that the EA is some 900 pages in length and covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources, and more. These subjects require a thoughtful analysis on my part in order to provide appropriate comments. Clearly, the Tribe and the Bureau of Indian Affairs have expended considerable time and effort to prepare and present this document and it warrants my careful review. P75-02

Considering this fee to trust application is the first ever "Tribal Consolidation Plan Area" in our state and encompasses more than 1400 acres of land, I am requesting an extension of 60 days beyond the September 19th deadline in order to provide meaningful comment. P75-03

I know that the Bureau of Indian Affairs has a history of granting extension when fee to trust acquisitions are this extensive. I would like to provide meaningful comment for your review and consideration. I await your timely response. Thank you for your consideration. P75-04

Sincerely,
Michele Hinnrichs
560 Rancho Alisal Dr.
Solvang, CA 93463
micheleh@patinc.com
805 688-6452

Comment Letter P76

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment - Santa Ynez Band of Chumash Indians Annexation Application

1 message

Gerry Shepherd <shepherd@west.net> Thu, Aug 29, 2013 at 7:28 PM
To: chad.broussard@bia.gov

Mr. Chad Broussard, Environmental Protection Specialist

Dept. of the Interior, Bureau of Indian Affairs

Pacific Regional Office, Suite 2820

2800 Cottage Way

Sacramento, CA 95825

via chad.broussard@bia.gov

Dear Mr. Broussard:

Please add this email to the many you have already received voicing opposition to the 30 day comment period, ending September 19, 2013, in which the public may submit comments to the Environmental Assessment for the Santa Ynez Band of Chumash Indians 'Camp 4' annexation application. The Environmental Assessment is 930 pages long, with significant potential impacts to the community plan, land use, water resources, air quality, to name a few. The public needs more than the allotted 30 days to comprehend, assess and analyze the impacts contained in this lengthy document. P77-01

I herein request that your office extend the comment period for at least 30 days, to October 19.

Respectfully submitted,

Gerry B. Shepherd

POBox 30

Santa Ynez, CA 93460

Gerry Shepherd

shepherd@wcai.net

805-688-3120

Comment Letters P78 and P79

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Stop it!

1 message

Jeanne Hollingsworth <jeannehollingsworth@mac.com> Thu, Aug 29, 2013 at 11:03 PM
To: Chad.broussard@bia.gov

Chad,

Please extend the 1,400 acre application by this group of "Indians" who are not Indians, they are megabuck reapers of gambling addictions. This is a complete scandal and will affect America in an unfavorable way. You cannot take land from the United Sates and speak to a band of people who no longer have any more than 1/16 Chumash blood as a separate government. That law that made fee to trust is archaic and should be cancelled just like homesteading or mining claims. P80-01 P80-02

If it were a situation of an unhealthy tribe that would be one thing, but this tribe is so well to do and so small with a population of less than 300 people, it is not right that they take this land out of county jurisdiction especially since the population of the Santa Ynez Valley is only 24,000 people. It was 20,000 people 20 years ago and cannot get above 26,000 people, ever, because of zoning. P80-03 P80-04

The impact of 1,400 acres is too much for the community to bear.

Please wake up and see the truth and the danger in what is proposed. P80-05

Best Regards,
Jeanne

Jeanne Hollingsworth
jeannehollingsworth@me.com

Comment Letters P81 through P83

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Fee to Trust Application by Chumash

message

Sheila@sbpr.org <Sheila@sbpr.org> Fri, Aug 30, 2013 at 12:23 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

Hello Mr. Broussard,

I was just made aware that the comment period on the Environmental Assessment (EA) of the 1400 Acre fee-to-trust application by the Santa Ynez Band of Chumash Indians expires soon. I am writing to ask for an extension of a minimum 60 days to give the Santa Ynez Valley community at large a chance to evaluate and send comments on the EA, which is very lengthy and extremely complex. P84-01

It is my understanding that this EA references a Tribal Consolidation Area (TSA) that overlaps on hundreds of privately owned homes and land. I find this unprecedented and think that property owners must have the time to research the TSA as it relates to the EA and other items. P84-02

Reading 25CFR151, I find that the interior Department imposes restrictions on future land use and that is a concern with the trust as spelled out for if this change is authorized, what happens to the EA? Is it meaningless at that point?. P84-03

This review of the complexities of the TSA is sincerely requested to make sure everyone in the Santa Ynez Valley has a chance for comment as the needs of everyone must be considered. P84-04

Thank you for the opportunity to address this very important issue.

Respectfully,

Sheila Benedict,

Resident – Santa Ynez Valley

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Fee to Trust -- Request for Extension of Review Time

1 message

Klaus Brown <klausbrownsyv@yahoo.com> Fri, Aug 30, 2013 at 2:08 PM
Reply-To: Klaus Brown <klausbrownsyv@yahoo.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: "info@syvconcernedcitizens.com" <info@syvconcernedcitizens.com>

To Mr. Chad Broussard, Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office,Suite 2820
2800 Cottage Way
Sacramento, CA 95825

Mr. Broussard,

My wife and I are home owners in the Santa Ynez Valley of Santa Barbara County. Our home is located a short distence from the Camp 4 property, the subject of a recent Fee To Trust Application by the Chumash Tribe. Our home is also within the Tribal Consolidation and Acquisition Plan filed by the Chumash. Therefore, the Camp 4 application and the associated Environmental Assessment is very important to us and we need more time beyond the current 19 Sept 2013 deadline to make known our comments on the topics listed below. P85-01

1. The Environmental Assessment submitted by the tribe in connection with its Fee-To-Trust application is 930 pages long. More than 30 days are needed to read, verify and evaluate the representations made in the EA before relevant comment can be articulated P85-02

2. On June 7, 2013 the BIA approved a Tribal Consolidation and Acquisition Plan encompassing Camp 4 plus approximately 10,000 additional acres, with no notice to the community, governing bodies or private landowners who own land inside the TCA. The community needs additional time to determine options for action that can be taken to protect property owners, both inside and adjacent to the TCA. P85-03

3. The action by the BIA in approving the TCA is unprecedented and needs to be evaluated, particularly as there was no public notice given of this action. P85-04

4. The TCA's impact is inconsistent with the County Board of Supervisors-adopted Santa Ynez Valley Community Plan and needs to be evaluated. P85-05

5. The BIA in approving the TCA has the effect of an inverse condemnation (a 'taking') for the properties inside and adjacent to the TCA. P85-06

6. The TCA incorporates property with an estimated aggregate value in the billions of dollars. The tax consequences to the state, county and local governments are astronomical and need to be evaluated. P85-07

7. Real properties in escrow in the area prior to the disclosure of the BIA's TCA approval have now fallen out of escrow. Realtors in the area need more time to evaluate these impacts. P85-08

8. There is a cloud on the title of all properties owned inside and adjacent to the TCA. P85-09

9. The EA covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation, and cultural resources. P85-10

Given breath and scope of these topics and the extensive review needed, I am requesting an extension of 60 days beyond the 19 Sept deadline in order to provide suitable comment. Such an extension is befitting the important local and state issues at hand. Thank you for your consideration. P85-11

Respectfully,

Klaus and Lois Brown

5465 Baseline Ave

Santa Ynez, CA 93460

Mobile -- 512 694 3750

email – klausbrownsyv@yahoo.com

Comment Letters P86 and P87

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

EA, Santa Ynez Band of Chumash Indians, 1400 acres

1 message

Kathy Cleary <kcleary@cfginc.us> Fri, Aug 30, 2013 at 4:17 PM
To: Chad.broussard@bia.gov

Dear Mr. Broassard,

Preservation of Los Olivos, P.O.L.O. is a grass roots citizen group. We represent over 1,000 residents in the Santa Ynez Valley and Santa Barbara County who believe all property owners should be treated equally. We are requesting a 60 day extension of the comment period on the Santa Ynez Band of Mission Indian's Environmental Analysis (1,400 acre fee-to-trust application). P88-01

Santa Barbara County has an established process for development that includes rigorous standards that are guided by the Santa Barbara County Master Plan, and in the Santa Ynez Valley the Santa Ynez Valley Community Plan (SYVCP). The SYVCP was 10 years in the making and included thousands of hours by not only county employees, but citizens who volunteered their time. P88-02

The Santa Ynez Band's proposed Environmental Analysis (EA) is over 900 pages long. It is an analysis of an area that is 1,400 acres. The transfer of this 1,400 acres into trust could have significant affect on surrounding property values. It is vitally important to our community that the County government, and its citizens, have adequate time to comment on this EA. The 1,400 acre parcel is accessed by three rural two lane highways. Water depletion of the aquifer is a paramount concern in this agricultural dependent valley. This is why the County, and the Valley have Community Plans. The SYVCP carefully outlines development to ensure all property owners can have reasonable expectation for future development. The EA must be evaluated to ensure its compliance with the established SYVCP. P88-03 P88-04

The EA also references the Tribal Consolidation Area. This "TCA" overlays hundreds of properties surrounding the 1,400 acres. The County, and property owners, must have sufficient time to understand this TCA. P88-05

In addition, P.O.L.O. requests additional time to comment as the EA does not appear to ensure that the use of the land will not be changed in the future, once the land is transferred into federal trust. Assistant Secretary of Indian Affairs, Carl Artman, explained in a 2008 letter that 25 CFR 151 does not allow the Secretary to impose restrictions on the future use of land by a tribal government, in order to allow them flexibility for the future. (http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf). If the 1,400 acres is in trust and the tribal government begins with this development plan for housing but there are no restrictions on future development, no future EA's may be required and this EA would be meaningless. P88-06 P88-07

For the above reasons, P.O.L.O. respectfully requests that you respect our County Government and the many citizens who are requesting an extension on this comment period. P88-08

Thank you very much,

Kathy Cleary,
P.O.L.O. Board President
805-693-5090

Comment Letters P89 through P95

Comment Letter P89

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P90

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

Comment Letters P91 through P95

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Comment Letter P96

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Re: Santa Ynez band of Chumash Indians,1400 acre fee- to - trust application environmental

1 message

Alice Olla <ollarealty@aol.com> Fri, Aug 30, 2013 at 7:51 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>
Cc: "info@polosyv.org" <info@polosyv.org>

Dear mr Broussard
We are requesting a 60 day extension on the comment period you and residents need more time to explore the ea ramifications Thank you joe and Alice Olla

P96-01

Sent from my iPhone

Broussard, Chad <chad.broussard@bia.gov>

Chumash issue extension request

1 message

Kathleen Ealand <kathleen.ealand@gmail.com> Fri, Aug 30, 2013 at 8:37 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

Dear Mr. Broussard,

As an interested citizen of the Santa Ynez Valley, I kindly ask you to extend the comment period for the Environmental Assessment of the 1400 acre property known as Camp 4, currently owned by the Band of Chumash Indians. P97-01

Respectfully yours,

Kathleen L. Ealand

1153 West Hwy 246

Buellton, CA 93427

805 686-5826

Comment Letter P98

Broussard, Chad <chad.broussard@bia.gov>

Extension

1 message

Richard Nagler <naglerr@mac.com> Fri, Aug 30, 2013 at 8:53 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Don't ruin the Santa Ynez Valley. More time is needed.

P98-01

Rich Nagler

Comment Letter P99

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash

1 message

cherie rivas <crivas1330@hotmail.com> Fri, Aug 30, 2013 at 9:16 PM
To: "Chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: "info@syvconcernedcitizens.com" <info@syvconcernedcitizens.com>

I am writing in regards to the Santa Ynez Band of Mission Chumash Indians' 1400 acre fee-to-trust application Environmental Assessment.
I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment. It is a very large report that will take a bit of time to go through and absorb. It is important to have that time so I can make well informed comments.
Thank you for your consideration on this matter.
Very truly yours,
Cherie Rivas
Santa Ynez Valley Resident

P100-01

Comment Letter P101

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Tribe Should Play By The Same Rules

1 message

Brad Ross <stirmach@verizon.net> Fri, Aug 30, 2013 at 9:42 PM
To: Chad.broussard@bia.gov

Please do not allow 1,400 acre fee-to-trust transaction to happen. This would allow the Chumash to do whatever they want on the land. It is more reasonable for them to play by the same rules that everyone else does. The fee-to-trust transaction will further isolate the tribe from the rest of the community. Don't do it. P101-01

Brad Ross
Los Olivos

Comment Letter P102

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1400 acres

1 message

Susan Vasek <javsav@peoplepc.com> Sat, Aug 31, 2013 at 6:05 AM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

I respectfully request further review on Santa Ynez land request by Chumash indians. This adversely affects our community and I am opposed to any further expansion of reservation lands. P103-01
Thank you, P103-02
Susan a vasek
Sent from my iPhone

Comment Letters P104 through P108

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Camp 4

1 message

Steve W wood <stevewwood@hughes.net> Sat, Aug 31, 2013 at 8:36 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Chad, I am another person requesting you extend the application period for "Camp 4" in Santa Ynez. It's a small thing to extend this application and a huge issue for thousands of residence in this area. We simply need time to study the application. P109-01

Steve Wood

Comment Letter P110

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1400 acre fee to trust application by the Chumash Band of Indians, Santa Ynez, CA

1 message

Virginia Cooper <art.adventures@hotmail.com> Sat, Aug 31, 2013 at 9:15 AM
To: Chad.broussard@bia.gov
Cc: "P.O.L.O." <info@polosyv.org>

Dear Mr. Broussard,
Please grant the residents of the Santa Ynez Valley a 60 day extension in order to allow time to study the environmental assessment on the land owned by the Chumash. The effects of the fee to trust are the removal of local government's ability to husband the land for all residents. Fee to trust agreements remove the local governmental authority over the land while local infrastructure is greatly impacted. P111-01 P111-02
Thank you for your consideration.
Yours truly, Virginia Cooper

Broussard, Chad <chad.broussard@bia.gov>

Chumash Fee to Trust Application-ENVIRONMENTAL ASSESSMENT

Message

Stan Freedman <stan13094@yahoo.com> Sat, Aug 31, 2013 at 9:36 AM
Reply-To: Stan Freedman <stan13094@yahoo.com>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>
Cc: "info@polosyv.org" <info@polosyv.org>

Dear Mr. Broussard:

I am a long time (23 years) resident/homeowner in the Meadowlark Ranches subdivision of Santa Ynez, which is located near the intersection of Highways 246 and 154. I am vehemently opposed to the Chumash's plan to annex the Camp 4 property to their reservation and forever remove the 1400 acres from the County tax rolls. P112-01

The Chumash have been essentially given an exclusive right to operate a very profitable casino and have amassed great wealth, individually and collectively, as a result. By putting their relatively recent real estate acquisition into a fee to trust, they will no longer pay needed property taxes and will develop the property any way they wish, with no regard to the same rules the rest of us must follow. Our beloved Santa Ynez Valley will be ruined forever. P112-02 P112-03

As a very concerned, tax-paying citizen, I implore you to not allow the Chumash tribe to take that scenic property off the County tax rolls and develop it any way they wish to the detriment of the other citizens of Santa Ynez and Santa Barbara County. I am one of many who are opposed to their annexation. P112-04

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P112-05

Respectfully,

Stanley S. Freedman

3985 Edgehill Lane
Santa Ynez, CA 93460
(805) 688-6098

Comment Letter P113

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the as the letter is a duplicate of Comment Letter P112.

Comment Letter P114

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Chumash Fee to Trust

1 message

Marguerite LePley <margueritelp@hotmail.com> Sat, Aug 31, 2013 at 11:18 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Dear Mr. Broussard - Please be thoughtful of the residents of Santa Ynez Valley and do what you can to have the Chumash Tribal entities be required to go through the environmental impact reports just like the rest of us do. P115-01

Their property is VERY visible to all who live and visit here and WE have been so careful to preserve it's beauty. Please do not be BOUGHT OFF by the tribe. P115-02

Thank you so much. We trust you to do right for our county.

Sincerely, Marguerite LePley, Santa Ynez

Comment Letter P116

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Fee to trust

1 message

Natalie <natred64@aol.com> Sat, Aug 31, 2013 at 12:54 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P117-01

Natalie Kaplan

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez band of Chumash 1,400 acre fee to trust

1 message

Patricia Murphy <secrets5@verizon.net> Sat, Aug 31, 2013 at 2:01 PM
To: chad.broussard@bia.gov
Cc: info@polosyv.org

Dear Mr Broussard,
Please study carefully the incredible impact that the 1,400 acre fee-to-trust application will have on the communities in Santa Barbara County. There will be big problems with substandard country roads, traffic,and water levels There is also great concern with future crime problems as these have greatly escalated since the Chumash Casino opened. Property owners must have additional time to study the impacts on their homes and peaceful way of life. We need a minimum of 60 additional days to study the EA.-Thank you, Patricia P. Murphy-land owner adjacent to the 1,400 acres.

P118-01

P118-02

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

RE: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENTRE:

1 message

ffk9@aol.com <ffk9@aol.com> Sat, Aug 31, 2013 at 2:13 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

Dear Mr. Broussard,

As a Santa Ynez Valley resident since 1986, I have lived 'side by side' with the Chumash. I have witnessed the negative impact of the gaming casino on what was once our beautiful and peaceful Valley. I do not appose the Tribe purchasing land for homes. I do appose any chance that a fee to trust might occur with the potential for further negative impacts on our environment and country lifestyle. I would hope to live 'side by side' following the same rules, laws, permit processes, and land use guidelines that we all must currently abide by. P119-01 P119-02 P119-03

I am including this letter supporting an extension for discussion and feedback, and hopefully a final end to the fee-to-trust possibilities...

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P119-04

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P119-05

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P119-06

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.

Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P119-07

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P119-08

Respectfully, *Mary Ann*

Mary Ann Sampson

110 White Oak Road
Santa Ynez, CA

Comment Letter P120

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P121

Broussard, Chad <chad.broussard@bia.gov>

BIA environmetal assesment.

1 message

David Wyatt <dfwyatt39@verizon.net> Sat, Aug 31, 2013 at 2:50 PM
To: Chad.broussard@bia.gov

Dear Mr Broussard,

This is a monumental decision affecting life in the Santa Ynez Valley.

Please delay the hearing by at least 60 days to give us time to study the impact of such a decision. P121-01

Thank you,
David & Nancy Wyatt
Solvang, CA

Comment Letters P122 through P125

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Comment Letter P126

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash Indians Fee to Trust Application, Environmental Assessment

1 message

James Riley <jimhriley@comcast.net> Sat, Aug 31, 2013 at 8:16 PM
To: Chad.broussard@bia.gov

Dear Mr. Broussard:

Please consider the impact this 1400 acre Fee to Trust application will have on our Santa Ynez Valley and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). Because of the size of the area under consideration (1400 Acres), and the need to study and understand the EA, The county and our community members need a minimum of 60 days to review the EA and to make comments.

P126-01

Thank you, Dr. James and Nadine Riley Long time Santa Ynez Valley residents

Comment Letters P127 and P128

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

RE: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

1 message

Jeanne Hollingsworth <jeannehollingsworth@mac.com> Sun, Sep 1, 2013 at 7:55 AM
To: Chad.broussard@bia.gov

Dear Mr Broussard,

Please request a 60 day extension for the comment period of the Environmental Assessment of the fee to trust application and EA analysis for the Santa Ynez Valley. P129-01

The small community with a population of 24,000 which is separated by over 30 miles from any other city and has limited county resources has specific demographics which make the impact of 1,400 acres monumental. P129-02

The tribal consolidation area includes private property. The future use of trust land is solely in the hands of 134 people who distinguish themselves as "Chumash Indians" and have billions of dollars to spend, gained solely from the gambling addictions of the surrounding cities. P129-03

Consideration is due to the members of this community who live wholesomely and by the rules. The only trouble brought into the community is from the people who visit the Casino from out of town. P129-04

The Cost versus benefit must be analyzed for the EA and a 60 day time extension is necessary for an assessment. P129-05

Respectfully,

Jeanne Hollingsworth

jeannehollingsworth@mac.com

Comment Letters P130 through P134

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment for SYV Band of Mission Chumash 1400-acre fee-to-trust application

1 message

Sybil Cline <sybilcline@gmail.com> Sun, Sep 1, 2013 at 4:24 PM
To: chad.broussard@bia.gov

Dear Mr. Broussard:

Would you please grant a sixty-day extension of the comment period for the recently released Environmental Assessment? At over 900 pages it is currently an all-too-brief period of time in which to digest a document of this magnitude. P135-01

An issue of such importance must be given in-depth, serious deliberation and study by *all* of the affected parties. The EA, with the inclusion of references to the Tribal Consolidation Area, concerns thousands of property owners within the Santa Ynez Valley and beyond. P135-02

Thank you for your consideration.

Sincerely,
Sybil K. Cline

Comment Letter P136

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Chumash Indians

Message

Ethel Larrabee <e.larrabee@verizon.net> Mon, Sep 2, 2013 at 6:01 AM
To: "BIA Broussard, Chad" <chad.broussard@bia.gov>
Cc: "P.O.L.O" <info@polosyv.org>, Concerned Citizens <info@syvconcernedcitizens.com>

Dear Mr. Broussard,

Regarding the Environmental Assessment of the Camp 4 fee-to-trust application submitted by the Santa Ynez Chumash Indians, please extend the review period by at least 60 days.

P137-01

Thank you,
Ethel Larrabee,
Resident of the Santa Ynez Valley

Comment Letters P138 through P145

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

60 day extension: Environmental Assessment comment period on Chumash 1400 acre fee-to-trust application

1 message

Gerry Schroeder <gerryschroeder@gmail.com> Mon, Sep 2, 2013 at 6:09 PM
To: Chad.broussard@bia.gov
Cc: info@polosyv.org

RE: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

Dear Mr. Broussard,

I live in Solvang, CA. I am very concerned about the potential loss of open space in the Santa Ynez Valley. As an individual I hope you listen to all those concerned instead of only attending to special interests backed by money. There is no doubt in my mind that the Chumash intend to develop this land for additional gaming/casino use. The development of these 1400 acres, which would be contrary to the general plan for the valley, would have a huge negative impact on this valley and the people living here. P146-01

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why **I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA).** P146-02

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P146-03

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P146-04

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P146-05

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P146-06

Respectfully,

Gerald Schroeder
1490 Aarhus Dr.
Solvang, CA 93463

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

1400 acres fee-to-trust/Chumash Indians

1 message

Kathi <klheringer@aol.com>
To: Chad.broussard@bia.gov

Mon, Sep 2, 2013 at 8:30 PM

Dear Mr. Broussard,

I cannot put it any better than the following letter. It would be completely unfair to the residents of Santa Barbara County and especially the Santa Ynez Valley for you to allow the Chumash application to proceed without allowing our community sufficient time to review the EA for the massive project being discussed by the Chumash Indian Tribe: P147-01

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P147-02

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P147-03

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P147-04

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P147-05

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P147-06

Respectfully,

Kathleen Heringer
Solvang

Broussard, Chad <chad.broussard@bia.gov>

Fw: Fwd: 1400 acres fee-to-trust/Chumash Indians

1 message

william heringer <wjheringer@yahoo.com> Mon, Sep 2, 2013 at 8:49 PM
Reply-To: william heringer <wjheringer@yahoo.com>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,

I cannot put it any better than the following letter. It would be completely unfair to the residents of Santa Barbara County and especially the Santa Ynez Valley for you to allow the Chumash application to proceed without allowing our community sufficient time to review the EA for the massive project being discussed by the Chumash Indian Tribe: P148-01

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P148-02

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P148-03

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P148-04

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P148-05

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P148-06

Respectfully,

William Heringer, MD
Solvang, California

Allen M. Segal

Mr. Chad Broussard, Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, Ca. 95825

August 30, 2013

Dear Mr. Broussard: As a citizen who is directly affected by the proposed Trust Acquisition of five parcels known as the Camp 4 Property by the Santa Ynez Band of Chumash Indians I am writing you to request a sixty day extension of the public comment deadline for the Environmental Assesment. P149-01

The County of Santa Barbara has extensive review requirements that must review the entire 930 pages of the submittal document. The 1400+- acre acquisition represents the largest non-contiguous Trust transfer to an Indian Tribe in the State of California and represents over 5% of the Agricultural designated and protected land within the Santa Ynez Valley. The impact on the surrounding area will be enormous if this transaction proceeds and most likely will be the subject of extensive litigation, both locally and nationally. P149-02

Mr. Broussard I realize that you are operating with a tacit mandate and bias which is understandable but I urge you to weigh the implications of this transaction very carefully as there is a lot at stake, both for the future of other Tribal expansions and the political ramifications that may follow. P149-03

Please consider my request for the time extension so an equitable review at the County level can take place. P149-04

Sincerely, Allen M. Segal, P.O. Box 717, Santa Ynez, Ca., 93460

RECEIVED BIA
2013 SEP 3 PM 2:2
REGIONAL
OFF

PO Box 717 | Santa Ynez | CA 93460
Office 805-686-1037 | Cell 805-478-7378
asegal@aandoranch.com

Comment Letters P150 and P151

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Indian Tribe Fee To Trust

1 message

linleebaum@aol.com <linleebaum@aol.com> Tue, Sep 3, 2013 at 8:34 AM
To: chad.broussard@bia.gov

This letter is to "Mr Chad Broussard and the BIA"

Dear Chad,

Concerning the Fee To Trust situation here in the Santa Ynez Valley. I am writing to ask why there is even consideration being given to the request of the Chumash Indian Tribe to take Camp 4 into Fee to Trust. P152-01

The Chumash Indian Tribe of Santa Barbara County has been purchasing land, hotels, building hotels and building gas stations to the tune of probably over $100,000,000 ... That figure is probably a conservative estimate. P152-02

The Chumash Indian Tribe as a nation and as individuals could buy and sell most of the people within Santa Barbara County and, for that matter, within the confines of all America.

> There is no need on their part to have the right to take land
> that has been, under the law, designated for 100 acre
> parcels. This beautiful land that has been taken care of by land owners for many
> years. These land owners have played by the rules as set forth
> in order to keep our air clean, our water as clean as possible, our
> traffic manageable and maintain the beauty of the Santa Ynez Valley P152-03

The Chumash Indian Tribe can afford to buy any ranch, home, condo, and land that they wish for their members. They call themselves members not family P152-04

I would like to know your definition of Fee to Trust and why any organization, nation or individual would qualify to take over land into Fee To Trust. As it is written, Fee to Trust could be considered if there is a dire need not just because an organization wants to add land to their trust in order to avoid County rules and taxes. P152-05

The Chumash Indian Tribe with their very large casino, 3 hotels 3 gas stations, etc are not in Need. As far as I know and from what I have heard if they want to build homes on the 1400 acres it will be not for themselves, but to sell. How do you suppose they would ever get back the $40,000,000 they spent to purchase the land called "Camp 4"?: if they built 14 ranches plus a guest house on each per parcel of land they could house probably 28 or so families, or they could sell each parcel and make probably over $3,000,000 per 100 acres. P152-06

> As a business person, it is my contention that they will need to
> recoup their $40,000,000. How do you suppose they will do that?
> It was always in their plans to build another casino and hotel on
> that land. Wouldn't that be a very strong business decision.
> so, by taking that land into Fee To Trust, they can build anything they want.

I come from several generations of families as do many thousands here in Santa Ynez and across our country. These families have struggled, toiled, suffered, no different from the Indians. These families are and have been P152-07

playing by the rules of our federal government and our local governments.
As you know from the 900 pages in your hands, there have been numerous studies as to environment impact when organizations and individuals want to build.

P152-07 Cont.

When the Chumash Indian Tribe purchased these 1400 acres there were rules and regulations they signed off on just like the rest of the land owners in and around our community. Other lands owners played by the rules and if the Chumash build 140 homes, a casino a hotel, it will not only be wrong it will destroy the environment of the our beautiful community.

P152-08

If, by chance, any of the members of the BIA or any segment of government has accepted any funds from the Chumash Indian Tribe, they should not be allowed to rule on this request.

P152-09

I know that there is a request for a 60 day extension so the parties involved can have an opportunity to read and understand the 900 plus pages of the EA.... That is a fair request but it is my feeling that because there is no NEED for the Chumash Indian Tribe to be given land that they do not need because they cannot afford land or homes, etc for their members. They can purchase 140 homes for their entire tribe members with Millions left over.

P152-10

Please protect the people and the land of our county. It is not fair for the Chumash Indian Tribe to take land and not abide by the laws of our county.

P152-11

Sincerely,

Lindalee Baumgarten

Comment Letter P153

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Indian...request for extension

1 message

Wendy Wergeles <wergeles@earthlink.net> Tue, Sep 3, 2013 at 10:03 AM
To: Chad.broussard@bia.gov
Cc: "P.O.L.O." <info@polosyv.org>

Dear Mr. Broussard,

I am writing to you as a longtime resident of Santa Barbara County regarding the 1,400 acre fee-to-trust application by the Chumash Indians.

To ensure that the needs of all people are considered and respected, please extend the comment period by 60 days to allow a thorough examination of this environmental assessment. P154-01

Most Sincerely,
Wendy Wergeles
P.O. Box 653
Los Alamos, CA 93440

Comment Letters P155 through P157

Comment Letter P155

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P156

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P34.

Comment Letter P157

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

RE: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

message

Andi Culbertson <mac@aculbertsonlaw.com> Tue, Sep 3, 2013 at 3:48 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Chad –

I am requesting an extension of time to review the EA for 60 days. P158-01

I am primarily concerned with the fact that the Project Description does not adequately account for public documents distributed by the Band which do not limit the use of the property to housing. Pursuant to 25 CFR 151.11, under those circumstances the Band must submit additional information critical to an adequate assessment. Because this information was not included, the analysis of alternatives, cumulative impact assessment, growth-inducing effects and, indeed, the entire document is flawed. P158-02

The very fact that this entire document is comprised of over 900 pages strongly suggests that an EIS would be the far superior course. P158-03

Please grant a 60-day extension so that I may offer carefully crafted comments for the consideration of your agency. P158-04

Andi Culbertson

Culbertson, Adams and Associates, Inc.

(805) 688-5327

(805) 688-5357 (fax)

mac@aculbertsonlaw.com

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment

1 message

Saint Lion <saint_lion@hotmail.com> Tue, Sep 3, 2013 at 4:20 PM
To: "Chad.broussard@bia.gov" <chad.broussard@bia.gov>

Dear Mr. Broussard,

Please understand the impact that this 1,400 acre fee to trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). Due to the size of the area involved and the complexity of the EA, the county and our community members need a minimum of 60 additional days to review the EA for comments. P159-01

Please extend the comment period by 60 days to allow a thorough examination of the EA to ensure that the needs of all people in the community and county are considered. P159-02

Respectfully,

Ann Young
236 White Oak Road
Santa Ynez, CA 93460

PETER VAN IDERSTINE

282 White Oak Road, Santa Ynez CA 93460 (805) 688-0257

August 30, 2013

Chad Broussard
Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, CA. 958

Re: TCA in the Santa Ynez Valley

Dear Chad,

I own five acres in the Santa Ynez Valley and recently became aware of the approval (with no public notification) of the local TCA.

Frankly, I am shocked something like this could happen without public notice or any consideration as to the potential impact this could have on the landowners. Everyone concerned about this issue should be allowed to voice their opinion on this important matter. P160-01

The Chumash tribe is slowly trying to overpower much of our valley. You must grant a 60-day extension to the County and our community to review the Environmental Assessment. P160-02

Sincerely yours,

Peter Van Iderstine

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Land trust

1 message

Kelli Pappas <kellisnailart@icloud.com> Tue, Sep 3, 2013 at 6:16 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Please extend your decision on the fee to trust decision for at least 60 days. The wealthy tribal members need to respect this community and work together. This is America, we need to compromise.

Thank you, long time valley girl

Sent from my iPad

P161-01

Comment Letter P162

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Comment Letter P163

Reg Dir ___ ack ✓
Dep Reg Dir ___ 7
Reg Adm Ofcr ___
Route Decern
Response Required ___ Yes
Due Date 9-10-13
Memo ___ Ltr ✓
File ___ Other ___

August 26, 2013

Amy Dutschke
Bureau of Indian Affairs – Pacific Region
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension

Dear Regional Director Dutschke,

I have been following the Santa Ynez Band of Chumash Indians' (The Tribe) actions regarding the 1,400 acres The Tribe currently owns in fee in the Santa Ynez Valley (Camp 4). Very shortly after the Land Consolidation Plan Area was approved by your office, without any prior notice that I was aware of to anyone, let alone private land owners whose property is included in the Area, I learned that The Tribe had filed a Fee-to-Trust application for Camp 4. P163-01

The Tribe's Environmental Assessment (EA), submitted separately to the BIA, is 930 pages long. The 30 day comment period presently expires on September 19, 2013. The EA covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources and the list continues. These subject areas require extensive, comprehensive reading and thoughtful analysis in order to provide appropriate comment. P163-02

Considering the fact that Camp 4 represents fee acreage in excess of 10% of <u>all</u> 111 Fee-to-Trust applications and resulting transfers that occurred during the period 2001 through 2011, and this is the first time a "Tribal Consolidation Plan Area" has been approved in California, I submit that there are significant issues to be reviewed and evaluated before informed comment can be formulated. Therefore, I am requesting an extension of 60 days beyond the current September 19th deadline for comment to be submitted for your consideration. P163-03

I await your timely response. Thank you for your consideration.

Sincerely,

[signature]
3445 Baseline Ave
Santa Ynez, Ca 93460

Comment Letter P164

August 29, 2013

Amy Dutschke
Regional Director
Bureau of Indian Affairs
2800 Cottage Way
Sacramento CA 95825

RECEIVED BIA
2013 SEP [illegible] PM 2: [illegible]
REGIONAL [illegible]

Reg Dir	[illegible] ✓
Dep Reg Dir	T
Reg Adm Ofcr	
Route	DECRMS
Response Required	yes
Date	9-9-13
[illegible]	Ltr ✓
[illegible]	Other

Dear Ms Dutschke,

I have sent you an email of the letter below. I just want to make sure this is received. P164-01

I received a copy of the 930 page Environmental Assessment (EA) regarding the Santa Ynez Band of Chumash Indians, Chumash, request to the BIA to take approximately 1400 acres of land in the Santa Ynez Valley from fee to trust. P164-02

There is reference in the EA to a Tribal Consolidation Area, TCA, which was approved in June by the BIA, which profoundly affects all who own property in the Santa Ynez Valley. We residents and the Santa Barbara County Supervisors were never made aware of this document until the application by the Tribe was made to the BIA. P164-03

I, and my attorney, need more P164-04

time & digest this EA and the Environmental Assessment. I am asking for an extention of the comment period on this Environment Assessment. A 60 day extension should be enough for us to read this 930 page assessment and EA and fully understand its impacts —

Thank you

Richard Sid Kaden
PO BOX 402
Santa Ynez CA 93460
805-895-6343

P164-04
(Cont.)

Comment Letter P165

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P163.

Comment Letter P166

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P1.

Comment Letter P167

Dir ✓
Res Dir T
Asst Dirs
Route RPM DECRMS
Response Required YES
Due Date 9-9-13
Memo Ltr L
File Other

August 31, 2013

Amy Dutschke
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension

Dear Regional Director Dutschke,

This letter is to request an extension of 60 days or more beyond the current September 19th deadline for comment concerning the Santa Ynez Chumash Indians actions regarding the 1400 acres, known as Camp 4, and the application they submitted to place this property from Fee-to-Trust. P167-01

The Tribe's Environmental Assessment (EA), submitted separately to the BIA, is 930 pages long. The 30 day comment period presently expires on September 19, 2013. The EA covers significant subjects of land and water resources, land use, air quality, federally listed wildlife, transportation and circulation, cultural resources and the list continues. These subject areas require extensive, comprehensive reading and thoughtful analysis in order to provide appropriate comment. P167-02

I submit that there are significant issues to be reviewed and evaluated before informed comment can be formulated. Therefore, I am requesting an extension of 60 days beyond the current September 19th deadline for comment to be submitted for your consideration. P167-03

I thank you for considering this letter and its request for an extension beyond the September 19th deadline. P167-04

Most sincerely,

R. Busby

R. Busby (home owner)
760 Hillside Drive
Solvang, CA 93463

RECEIVED BY 2013 SEP -4 P 2:31 REGIONAL

Reg Dir Del ✓
Dep Reg Dir
Reg Adm Ofcr
Route DECRMS
Response Required Yes
Due Date 9-9-13
Memo Ltr ✓
Tele Other

August 29, 2013

Amy Dutschke
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension

Dear Regional Director Dutschke,

Like most of the residents of the Valley, I have been opposed to Camp 4 becoming a holding of the Chumash Tribe's Sovereign Nation. As the owners of Camp 4, a parcel the size of Solvang, the Tribe should be subjected to all the same rules, rights, and responsibilities of any other land owner in the County. Alarmingly, buried in the application for Fee to Trust on Camp 4, was a map, the enormous 11,000 acre Tribal Consolidation Area. P168-01 P168-02 P168-03

This community is reeling, and needs time. An extension of at least 60 days seems appropriate. P168-04

I await your timely response. Thank you for your consideration. P168-05

Sincerely,

Donna Will

Donna & Patrick Will
Solvang Homeowners
1535 Gamby Way
Solvang, CA 93463

Patrick Will

Comment Letter P169

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P163.

RECEIVED BI-
2013 SEP PM 2:39
GIONAL

James Victor
3980 Skylark Rd
Santa Ynez, CA 93460

August 29, 2013

Reg Dir ____ ✓
Dep Reg Dir ____
Reg Adm Ofcr
Route ____ Decins
Response Required Yes
Due Date 9-9-13
Memo ____ Ltr ✓
Tele ____ Other ____

Amy Dutschke
Regional Director
2800 Cottage Way,
Sacramento, CA 95825
FAX: 916 978 6099

RE: Request for an Extension

Dear Regional Director Dutschke,

Regarding the Chumash Tribal Consolidation Plan Area, and Fee to Trust, I am very opposed to both! P170-01

Considering this fee to trust application is within our state's first ever "Tribal Consolidation Plan Area" and encompasses more than 1400 acres of land, I am requesting an extension of at least 60 days beyond the September 19th deadline in order to provide suitable comment. P170-02

Sincerely,

James Victor

Melinda Jensen

Post Office Box 249
7735 Happy Canyon Road
Santa Ynez CA 93460 USA

805 688-6119 Office & FAX
805 688-6183 Home
melinda.jensen@yahoo.com

Reg Dir
Dep Reg Dir
Reg Adm Ofcr
Route DecRm
Response Required Yes
Due Date 9-13-13
Memo Ltr
Tele Other

September 3, 2013

Ms. Amy Dutschke
Regional Director
Bureau of Indian Affairs - Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: Proposed 1400-Acre Annexation
Chumash Tribe - Santa Ynez

Dear Ms. Dutschke:

I strongly object to annexing 1400 acres to the Chumash Reservation in Santa Ynez. Please deny the annexation and keep the present zoning on this agricultural property. P171-01

This is a small sweet pristine Valley. I have lived here for forty-two years. We all moved here and cherish what we have. We all follow the zoning rules. P171-02

I believe it would be a zoning tragedy to have anything but what is currently zoned for this property, namely agriculture.

This property is on one of our Scenic Highways, it has always been zoned for agriculture, water is precious, and it is several miles away from the present Reservation. P171-03 P171-04

Comment Letters P172 through P175

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P163.

Broussard, Chad <chad.broussard@bia.gov>

Chumash Application for fee to trust application for 1400 acres in Santa Ynez Valley

1 message

Judy Ishkanian <drish@aol.com> Wed, Sep 4, 2013 at 10:47 AM
To: Chad.broussard@bia.gov

To: Mr. Chad Broussard,
From: Neighborhood Defense League
Judith Ishkanian, President

re: The Chumash Tribal Acquisition and Consolidation Plan

Dear Mr. Broussard:

On August 20, 2013, Our NDLC board members joined several hundred Santa Barbara County citizens to a board of Supervisors hearing on the application for Fee to Trust Application of the Chumash tribe of the 1400 acres it purchased, adjacent to the reservation. Upon arrival, attendees were handed a large document titled: Land Consolidation and Acquisition Plan. This document was nothing less than shocking, not only to attendees, but to all five Supervisors. This document spells out what amounts to a hostile takeover of non contiguous , developed lands amounting to over 11,000 acres in Santa Ynez Valley. The Board of Supervisors voted 3 to 2 to direct the Chumash tribe to seek development of their own 1400 acres through the regular channels of County Government. P176-01 P176-02 P176-03

Regarding the Land Consolidation and Acquisition Plan, and its amazingly brief window for public review, NDLC urges an very lengthy extension and the very least and a thorough rejection at the most. P176-04

The credibility of the BIA, as managers of the trust for Aboriginal peoples is at stake as well as traditional land use law. P176-05

Sincerely,

Judith Ishkanian, President
for the Board of Directors
Neighborhood Defense League

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Fwd: Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENTRE:

1 message

syvrancho@aol.com <syvrancho@aol.com> Wed, Sep 4, 2013 at 10:45 AM
To: Chad.broussard@bia.gov

Dear Mr. Broussard,

As a Santa Ynez Valley resident since 1982, I am quite astonished that my property falls within the 10,000 acres being considered for fee to trust conversion. I am also astonished that ANYONE could have property included with that potential conversion. This lacks any common sense or reason. P177-01

Considering the magnitude of this type of action, it would seem more than reasonable for the residents and tax payers of this area to have a MINIMUM of six months to study the ramifications and a course of action. P177-02

I strongly object to politicians and other people of 'influence' from outside of the Valley, and even the County of Santa Barbara, substantially influencing this process without having to live with the negative impact and consequences. P177-03

The Chumash have a reservation, and are actually a small tribe. The casino has afforded them the financial means to purchase property and businesses as investments and as places to live 'outside' of the reservation boundaries. They have made full use of the 'American way' of investing their casino generated income into local investment properties to further benefit their tribe. What the property owners of Santa Ynez are asking is that they also abide by the laws, rules, regulations, permits, environmental impact reviews, etc. that all of the property owners in this County, and in California, must follow. Specifically the 1400 acres known as Camp 4, and also the wide net they have now cast over many many additional acres.

This whole fee to trust fiasco will only benefit a few of the tribe members at the expense of all of the residents and taxpayers of Santa Barbara County and specifically of the Santa Ynez Valley. P177-04

I am attaching the letter requesting an extension of the review to acknowledge my support... P177-05

Respectfully, David

David M. Norcott
110 White Oak Road
Santa Ynez, CA

Please understand the impact that this 1,400 acre fee-to-trust application will have on P177-06

communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P177-06 (Cont.)

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P177-07

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P177-08

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.

Assistant Secretary Indian Affairs: Carl Artman, 2008 P177-09

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P177-10

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, ENVIRONMENTAL ASSESSMENT

1 message

fred kovol <fredkovol@yahoo.com> Wed, Sep 4, 2013 at 10:54 AM
Reply-To: fred kovol <fredkovol@yahoo.com>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,

Please understand the impact that this 1,400 acre fee-to-trust application will have on communities in Santa Barbara County and why I am requesting a 60 day extension of the comment period on the recently released Environmental Assessment (EA). P178-01

The 1,400 acres in this fee-to-trust application and EA analysis is the size of one of the largest cities in the valley, Solvang. Because of the size of the area, and the complexity of the EA, the County and our community members need a minimum of 60 additional days to review the EA for comments. P178-02

In addition, the EA includes and references the Tribal Consolidation Area. This is an overlay that includes hundreds of privately owned homes. This is unprecedented. Because the "TCA" is included and referenced in the EA, the County and property owners must have time to research the TCA, and how it relates to the EA. P178-03

In addition, 25 CFR 151 does not authorize the Department of the Interior to impose restrictions on a tribe's future use of land which has been taken into trust. If the tribe can change the use of the land, then this EA becomes meaningless.
Assistant Secretary Indian Affairs: Carl Artman, 2008

http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf P178-04

Please extend the comment period by 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered. P178-05

In particular, EA, 2.2.5 WATER SUPPLY has outdated information. No reference is made to Santa Barbara Counties annual assessment of the Santa Ynez Uplands Basin current status. Where is the annual report by the Santa Ynez River Water District tasked with monitoring basins from the Uplands and other basins to the Pacific Ocean. Will they be allowed to monitor Camp 4 wells to ascertain the overall health of the Basin? I served on the California AB3030 basin water management committee and after 2 years came to a different P178-06

conclusion than what is provided in the EA.

P178-06
(Cont.)

Sincerely,

Fred Kovol
1676 Nordentoft Way
Solvang, CA 93463-2115

Comment Letter P179

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application

1 message

Gregory Schipper <g@whiteassociates.com> Thu, Sep 5, 2013 at 5:31 AM
To: Chad.broussard@bia.gov

Hi Chad,

Thank you for this opportunity to make you aware of some very serious concerns I have about the fee to trust application for the Santa Ynez Chumash.

My family recently bought a home near the Camp Four property and in the TCA specified by the Chumash and want you to put a stop to this insanity. P180-01

We bought our home because of the unique rural nature of the area and don't want to see more development that will unregulated and off the tax rolls.

My understanding is the tribal members are each currently receiving $47,000 per month. Do they need more? We can't ever right the past wrongs, but at some point the rights of other landowners need to be considered. P180-02

Does anywhere need more casinos that take advantage of the people who can least afford it? P180-03

I am urging you to grant an extension to of 60 days to allow a thorough examination of this Environmental Assessment to ensure that the needs of all people are considered and to make certain we all think long and hard about the consequences of putting this massive piece of land into trust for future unregulated development. P180-04

Please feel free to call me if you would like to discuss in greater detail. P180-05

Respectfully,

Greg

Gregory A. Schipper

Comment Letter P181

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Requesting 60 Day Extension-Santa Ynez, California

1 message

Elizabeth Knowlton <ranchoquedito@gmail.com> Thu, Sep 5, 2013 at 7:42 AM
To: chad.broussard@bia.gov

Dear Mr. Broussard,
I have just learned of the 30 day period for public comment on the Chumash Indian Camp 4 Annexation plan and Tribal Consolidation & Acquisition Plan (TCA). I am requesting an extention of at least 60 days in order for myself and community to be more informed on such a gigantic application by a Sovereign state for changing Land Use in our Valley. P181-01

This will have a devastating impact on our small community, and proceeds in the opposite direction of our long worked on "Santa Ynez Valley Community Plan". P181-02

My friends and I have an unending list of concerns if this plan is approved:
>water
>loss of property tax revenue for local, county, & state
>public services / fire/police (they over burden the system now with the casino)
>traffic (Hwy 154 is already deadly)
>Loss in real estate values
>change in character of the Danish town of Solvang /Ranches /Vineyards...the reason people moved here in 1st place
>crime
>making exceptions for the ' few' (Chumash pop. just over 100) versus listening to the impact on the' many' ~10,000+
I can go on and on P181-03

I urge you to do the right thing for our beloved community and environment. Some are afraid to speak out because they have accepted $money$ from the Chumash and therefore it has unfortunately bought silence from many. But privately, the residents of the Santa Ynez Valley are worried sick about the ramifications of the Fee To Trust and the TCA. P181-04

Please provide a 'reasonable' window of time for all to be informed. Respectfully, Elizabeth Knowlton, Santa Ynez, resident P181-05

Comment Letter P182

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

RE: Santa Ynez Band of Chumash Indians

1 message

Thoma Martinov <thomamartinov@hotmail.com> Thu, Sep 5, 2013 at 10:02 AM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

RE: Santa Ynez Band of Chumash Indians, 1,400 acre fee to Trust, application, ENVIRONMENTAL ASSESSMENT

Mr. Broussard, As a resident of Meadowlark Ranches, Santa Ynez Valley, I am deeply concerned for my community.

Please extend the EA comment period to sixty days. Sincerely, Thoma Martinov P183-01

RE: Santa Ynez Band of Chumash Indians
Sent from my iPadRE: Santa Ynez Band of Chumash Indians

Comment Letters P184 through P188

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P163.

Comment Letter P189

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

60 day extension on comment period re Chumash fee-to-trust application & Camp 4 (at the moment, 1,400 acres in the Santa Ynez Valley, CA)

1 message

Sheridan Force <sfortor@gmail.com>
To: Chad.broussard@bia.gov

Thu, Sep 5, 2013 at 4:38 PM

Dear Mr. Broussard-

It grieves me that with all the mistakes we have all made, that we just can't seem to learn how to get 'it right'!

How does a reactionary 'flipping' of 180 degrees, in a misguided effort to right-past-wrongs, ever justify a future lapse of good judgement and intelligent thinking?

We are not the same nation or the same people of hundreds of years ago. And yet we are. We are the same created people, but a people 'of today', with issues 'of today', yet with the same 'ages-old' hopes of a better tomorrow for our children. We are from the same cloth. The 'where and the when' is just a matter of time on a history chart, not a matter of significance or import on a 'politically correct ' chart.

I ask that you let wisdom and reflection, foresight and sound reason, re-unite us as a common people. To let good judgment take precedence over hostility and counterproductive, even counterintuitive decision making. P189-01

I ask that you allow for a 60 day extension for comment on the recently released EA regarding the proposed fee-to-trust application of the Chumash 1,400 acre property called Camp 4. It is so hugely significant, potentially so precedent setting, that we must get this right! An extension would allow for the possibility of a more complete community impact report and ultimately, for a better resolve. P189-02

Additionally, I suggest that the fee-to-trust program be re-evaluated in the context of its current necessity and ultimate effectiveness in achieving proper planning goals meant to preserve and improve life for our entire community. (If only our ancestors had been so wise and performed their duties better.) At this juncture I believe the program to be antithetical to good planing and prosperity for future generations. P189-03

But moreover, I really ask that you help revamp, and redesign, the function of the BIA and how it relates to repairing, not old wounds impossible to repair, but rather to assure that all people are treated equally, respectfully, and fairly, under a common goal and plan. We need visionaries who can assure future progress, and yes, healings into a better body of Americans, one and all. No division of land, soul, and mind, but cooperation of process and agreement, void of unfairness, that was so apparently wrong of centuries past, for many peoples around the world. P189-04

Let us be cooperative in our ultimate goals. And let those goals be worthy ones.

We have had a wonderful Santa Ynez Valley community come together over the years to try and uphold the beauty and dignity of her residents and native sons and daughters. And by that I mean all who love the valley and have been born into it whether that be from 10,000 years ago or 1 generation ago, and for the 'huddled masses' that helped to make this country great, and to those who honor her lands and her democratic processes.

May our own children be represented and acknowledge as Native Americans, who were born of this era, who also look to the future for independence, freedom, and unity.

Did we teach our children well? P189-05

History will show, as the generations hence-forth look back at us and say, either, 'You did well, or you did not'.

Let's do the right thing.

Thank you,

Sheridan Force

P189-05
(Cont.)

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Chumash/Fee to Trust Application

1 message

William Otto <bovinebill@hotmail.com> Thu, Sep 5, 2013 at 10:39 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Dear Mr Broussard,

I recently moved to Santa Ynez and I am disturbed about the Fee to Trust application by the Chumash and it's effect on all of us in our community. I am happy for them that the Casino is successful such that they can purchase significant amounts of land in the valley. P190-01

I am requesting a 2 month extension of the comment period on the Environmental Assessment to give myself and others enough time to read and understand the report and all of it's implications. P190-02

This FTA will have a huge impact on this community and the entire county of Santa Barbara. Furthermore, the Tribal Consolidation Area includes over 10,000 acres and includes hundreds of small ranches, private homes, businesses. P190-03

Please extend the time period so we can really examine the Environmental Assessment and it's affect on all of the thousands of members in our community. P190-04

Thank you for the consideration.

William J Otto, DVM
380 Meadowlark Rd
Santa Ynez, CA 93460

Comment Letter P191

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment - Extension Request

1 message

kelly rose <kelly.rose1@verizon.net> Fri, Sep 6, 2013 at 7:31 AM
Reply-To: kelly rose <kelly.rose1@verizon.net>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

Dear Mr. Broussard,
I just received an email from the Bureau of Indian Affairs indicating that the comment period for the Environmental Assessment has been extended. I appreciate the fact that the BIA did listen to the voices of those of us who are affected by the proposed Fee to Trust transfer of the 1,400 acres referred to as Camp 4 as well as to the proposed Tribal Consolidation Area.

However, I would like to point out that a two (2) week extension is absolutely ridiculous and totally inadequate to review this 900+ page document. It appears to me that the BIA is simply going through the motions of "trying to be helpful" without actually making any reasonable concessions.

P192-01

Very truly yours,
Kelly Rose

----- Forwarded Message -----
From: kelly rose <kelly.rose1@verizon.net>
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>
Sent: Wednesday, August 28, 2013 3:26 PM
Subject: Environmental Assessment - Extension Request

Dear Mr. Broussard,
I am a resident and property owner in the Santa Ynez Valley. We operate a horse ranch which is located near the 1,400 acres owned in fee by the Santa Ynez Band of Chumash Indians. I was made aware of an Environmental Assessment submitted in August 2013 by the Chumash to the Bureau of Indian Affairs in connection with a request for transfer of this property from fee to trust. I also understand that the comment period established by the BIA ends September 15, 2013. Additionally, I am sure you know that the Environmental Assessment is more than 900 pages long.

The Environmental Assessment Document, the proposed Fee to Trust request, and the information regarding the Tribal Consolidation Area personally impact me, my family and the value and future of our property. For example, Proposal A provides for 200+ acres of open space and Proposal B provides for nearly 800 acres of open space. Both 200 acres and 800 acres are substantial in size and would allow substantial future development which would not be restricted once the property was transferred to trust. Also, any future development would make all of the information and plans regarding water use, disposal of waste water, traffic and other impacts irrelevant and useless. It would be worse than comparing apples to oranges - - it would be comparing apples to elephants.

I am requesting an extension of at least 90 days so that my wife, my attorney and I can understand what is in these 900+ pages that directly impact us, our property, our livelihood, our direct environment and our quality of live so that we can respond intelligently with our concerns.

P192-02 (Cont.)

Thank you for your objective assessment of my request for a extension of the comment period.

Kelly and Sandy Rose

Comment Letter P193

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P2.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Mission Chumash Indians, 1,400 acre fee-to-trust application, Environmental Assessment

1 message

Lynette Peavy <Lynette@sanlucasranch.com> Fri, Sep 6, 2013 at 4:01 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>
Cc: "info@polosyv.org" <info@polosyv.org>

Please see letter attached. P194-01

Thank you,

Holy Cow
PERFORMANCE HORSES LLC
HOME OF SHADY LIL STARLIGHT

www.holycowperformancehorses.com

P: (805) 688-4241 F: (805) 693-1702

LYNETTE PEAVY

doc20130906155144.pdf
289K

SAN LUCAS RANCH

9/06/2013

Dear Mr. Broussard:

I am asking you for a 90 day extension for public review of the Environmental Assessment for the 1400 acres in the Santa Ynez Valley known as Camp 4. P194-02

Due to the length of the document and the enormity of the technical data contained within it, it is impossible to fairly comprehend and respond to it in such a short time frame. P194-03

Also, because my family was an owner of this property for over 80 years, I am intimately familiar with the property and the major well on it (we drilled it), I would like to make sure that the plans for that property will not negatively impact my agricultural property next door. P194-04

Thank you for your prompt attention to this matter. P194-05

Sincerely,

Anne V. Crawford-Hall

Anne V. Crawford-Hall

East Highway 154
Mailing Address P.O. Box 338, Santa Ynez, CA 93460
Office: 805.688.4241 • Fax: 805.693.1702
info@sanlucasranch.com

Comment Letters P195 and P196

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P2.

Chad Broussard, Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, CA 95825

SUBJECT: Request for an Extension of Comment Period -- EA for Santa Ynez Band of Chumash Indians

Dear Mr. Broussard,

I/we are residents of Santa Ynez Rancho Estates, a rural residential neighborhood contiguous with the property known as Camp 4. In addition, our water provider is the Santa Ynez Rancho Estates Mutual Water Company with a service area contiguous to Camp 4, and all of that company's wells and water storage facilities are located within the "Tribal Consolidation Area". P197-01

The fee-to-trust application, the unprecedented "Tribal Consolidation Plan Area", and the potential development of Camp 4 without any local control or local taxes all present serious impacts to the character of our community, our quality of life, and our property values. The subject EA is some 900 pages in length and covers many significant subject areas. These complex issues require comprehensive reading and thoughtful analysis in order to submit informed comments. P197-02

We request an extension of at least 30 days beyond the September 19th deadline so that we and our Mutual Water Company have a fair chance to provide meaningful comment for your review and consideration. P197-03

Sincerely,

NAME(s): JERRY & CLAIRE SHOEMAKER DATE: 9-6-13

ADDRESS: 1721 SKY DR
SANTA YNEZ CA 93460

Comment Letters P198 through P205

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P197.

Comment Letter P206

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P197.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment Submitted by Santa Ynez Band of Chumash Indians re: Camp 4 Fee-To-Trust Application

1 message

kelly gray <dailylawma@gmail.com> Tue, Sep 10, 2013 at 4:16 PM
To: chad.broussard@bia.gov
Cc: Gerry Shepherd <shepherd@west.net>, Doreen Farr <dfarr@countyofsb.org>

Chad Broussard (via email only)
Environmental Protection Specialist,
Bureau of Indian Affairs, Pacific Regional Office

Dear Mr. Broussard:

I have read the 930 page Environmental Assessment submitted to you by the Santa Ynez Band of Chumash Indians in connection with their Fee-to-Trust application for the 1,400 acres of land in the Santa Ynez Valley known as "Camp 4".

What stands out to me in a glaring way is the number of unsubstantiated assertions of "fact" which are used to support global "conclusions" as to why alternatives less than full approval of the single largest Fee-to-Trust application located in the unprecedented, newly approved (with no prior notice to anyone) Tribal Consolidation Area, are "not reasonable" and, thus "not evaluated in the EA". As a research report for a high school project, this lack of foundation for such broad-reaching conclusions would merit a failing grade. P207-01

For example:

"To take fewer parcels into trust would not provide acreage for housing assignments; circulation; multiple access and egress points for residential safety; agriculture operations to diversify tribally-governed commercial enterprises; open space, recreation, and conservation in accordance with Tribal environmental ordinances; and associated utility infrastructure to support each of the designated land uses. **UNDOCUMENTED ASSERTION**...Because the purpose and need would not be met, **CONCLUSION WITHOUT FOUNDATION:<u>such an alternative is not considered reasonable and therefore is not evaluated</u>** within the Environmental Assessment (EA). There are no other available comparable lands that would provide a sufficient land base to support the proposed land uses to meet the purpose and need of the Proposed Action that are within the Tribe's Tribal Consolidation Area. In addition, **UNDOCUMENTED ASSERTION:** lands outside the Tribe's Tribal Consolidation Area would not meet the purpose and need and would constitute an Off-Reservation trust acquisition request. **CONCLUSION WITHOUT FOUNDATION:<u>alternative locations for the trust acquisition are not evaluated</u>** within the EA." [page 2-1 of 930 page EA] P207-02 P207-03

UNDOCUMENTED ASSERTION: "Inclusion of all eight one-acre concept plans as fully-evaluated alternatives within the EA would result in a high level of redundancy, would not provide the contrast in alternatives as required by CEQ, and would not further educate the decision makers as to the environmental impacts of the Proposed Action. Therefore, each variation of the one-acre concept plan has not been individually subject to detailed analysis in the EA. In addition, the potential that implementation of the other one-acre concept plans would result in significant environmental impacts not identified under Alternative B is minimal; and **CONCLUSION WITHOUT FOUNDATION: <u>therefore each one-acre concept plan does not warrant individual assessments</u>** within the EA." [page 2-2 of 930 page EA] P207-04

The examples above are clearly that - examples and not an exhaustive list. It is YOUR obligation to determine the relevant **facts**, determine what additional relevant facts are needed to perform your evaluation and obtain them from the Tribe, and only then form **your own conclusions.** P207-05

Following is a bullet list of some of my additional concerns. I reference the Santa Ynez Valley Community Plan. The link to the Plan is:

http://www.santaynezvalleyalliance.org/index_extras/SYVCommPlan_10-15-09[1].pdf

1. On page 2-3, the Chumash plan to provide their own waste water treatment plan. Camp 4 sits atop of the aquafer that supports a significant portion of Santa Barbara County. Who would represent the whole population that relies on that water in terms of oversight of the proposed Chumash waste water treatment? P207-06

2. On page 2-4, the following representation is made: **No gaming would occur on the subject property.** The Chumash obtained 2 gaming permits....they have used only one to date. It would be negligent for your analysis of the EA to ignore the potential construction of a casino on Camp 4/TCA land. P207-07

3. On pages 2-6/7, the following is stated: **The County, Solvang/Santa Ynez Sheriff Substation provides general public safety and law enforcement service for the project area. The Sheriff Substation is located in Solvang, approximately three miles from the project site. It provides 24-hour service to the Santa Ynez Valley and Solvang area.The County Fire Department (Fire Department) provides structural fire protection services to the project area. The Fire Department protects primarily residential areas and responds to calls for structural fires as well as medical emergencies.**
The Chumash have said they would be willing to pay $10 Million to compensate the County for the loss of tax revenue from Camp 4. The $10 Million in no way provides adequate compensation for the in perpetuity loss of tax revenues if the 1,400 acres is taken in Trust, let alone addresses the significant new demands the existing County law enforcement and fire services that would result from the proposed development of this now virtually undeveloped pristine land. P207-08

4. On page 2-7, the following is stated **To meet increased demands, the Tribe would develop an on-site water supply system using groundwater.** There is no information as to how the potential increased demand, let alone the stated increased demand will impact all of the existing and future needs of all of the populations who are dependent upon the aquifer. P207-09

5. On page 2-8, the following is stated: **Existing access roads would be improved and new roads constructed to provide access to the proposed residences and existing agricultural operations.** The EA does not speak to the impact of the additional traffic that would result from the stated proposed development of Camp 4, let alone the potential development that is NOT addressed but reasonably anticipated to fulfill the economic opportunities the Chumash have stated will be provided to allow **"the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises."** (Page 1-7) P207-10

6. On page 2-10, the following is stated: **"All identified wetland areas and California Live Oak would be avoided to the maximum extent feasible."** The term "feasible" is subjective. Although not bound by State and local laws on Trust lands, the Chumash have voted on State and local measures on their ballots. State and local laws have been enacted specifically to protect wetland areas and California Live Oak for the enjoyment of OUR future generations. "We the people" - including the Chumash - have elevated the future value of these environmental protection objectives over all other potential uses of the land on which they are located. P207-11

6. On page 2-12, the following is stated: **"The tribal facilities would include development of a banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, and a tribal community space including ceremony room and gymnasium....Approximately 400 parking spaces would be provided for the facilities."**
Nowhere in the 930 page EA does the Tribe address the environmental impact, let alone the broader community impact, of the use of a facility on Camp 4 that necessitates 400 parking spaces. The proposed "community event facilities are stated to encompass nearly 80,000 square feet!. (page 2-14).
Santa Ynez Valley residents already are gravely concerned about and pursuing laws to regulate and restrict the number of special events that may be hosted at wineries and other privately owned facilities due to the traffic, light and sound pollution, and other negative impacts caused by these events. P207-12

7. On page 2-16 the following is stated: **"Impacts to biological resources would be greater under Alternative A due to the size of the assignments. Under Alternative A, approximately 330.11 acres of critical habitat for a protected species would be removed from designation. Under Alternative B, approximately 65.28 acres of the critical habitat would be removed from designation. Both alternatives would adversely impact water of the U.S., special-status species, protected oak trees, and migratory birds without the implementation of mitigation."**
The Chumash concede that their proposed developments for Camp 4 adversely impact biological resources, protected species, protected trees and migratory birds. It is your obligation to determine, as a matter of fact, that the proposed development of Camp 4 by the Chumash warrant these adverse consequences.

P207-13

8. On page 2-15, the following is stated: **"No adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative..."**
This is a broad conclusion...not a statement of fact. Mr. Broussard, please fulfill your duty to exercise **your own due diligence** so that you may come to your own conclusions as to what adverse impacts would result from the pursuit of either Alternative A or Alternative B. Please review Alternative A and Alternative B against the background of the Santa Ynez Valley Community Plan.

P207-14

9. On page 4-69, the following is stated: **"A project that would induce "disorderly" growth (i.e., would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts."**
The County has spoken to what is deemed to be "orderly growth". This statement is incorporated in the Santa Ynez Valley Community Plan. Neither Alternative A nor Alternative B are incorporated in the county's vision of orderly growth.

P207-15

10. On the same page (4-69) the following is stated: **"No significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B."** Please exercise your own due diligence and do not merely adopt these conclusions. The term "significant" is highly subjective, and it is extremely significant to non-Chumash majority members of this community that any development of Camp 4 have minimal detrimental impacts on our use and enjoyment of our home.

P207-16

I leave it to the respective experts, those who act on behalf of members of the Santa Ynez Valley community as well as those consulted by the BIA, to address the specific statements regarding the land, water, air quality, biological resources, cultural resources, socioeconomic and environmental justice issues, transportation and circulation, land use, public services, noise, hazardous materials, and visual resources.

In closing, I invite you to spend some time discretely in our community - free from lobbying by either the Chumash or the non-Chumash residents of the Santa Ynez Valley. Walk around Camp 4. Drive Highway 154 between Lake Cachuma and Los Olivos during traffic hours and holidays. View this community as if it were your own. Then exercise your own due diligence and trust your spirit as you come to your own conclusions as to the true environmental impacts that would result from the development of Alternative A, Alternative B or anything else the Chumash may freely choose to develop on the land in issue.

P207-17

Thank you in advance for your consideration of these and all other matters related to the EA.

Sincerely,

Kelly B. Gray
P.O. Box 384
Los Olivos, California 93441
dailylawma@gmail.com

cc via USPS
BIA Regional Director, Amy Dutschke
Assistant Secretary, Indian Affairs, Kevin Washburn
U.S. Senator Diane Feinstein
U.S. Senator Barbara Boxer
U.S. Congresswoman Lois Capps

California Governor Jerry Brown
California Senator Hanna-Beth Jackson
California Assemblyman Das Williams
Santa Ynez Valley Alliance Chair Mark Oliver
Santa Barbara News Press
Santa Maria Times
Santa Ynez Valley Journal
Los Angeles Times

–
Kelly B. Gray

Comment Letter P208

Jane Quigley
630 Lillebakke Ct.
Solvang, CA 93463
805-688-1241

Reg Dir
Dep Reg Dir
Reg Adm Ofcr
Route Decrms
Response Yes
Due Date 9-17-13
Memo
Tele

RECEIVED BY
2013 SEP PM 3:20

Ms. Amy Dutschke
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

September 3, 2013

RE: Chumash Indian Tribal expansion fee to trust in Santa Ynez Valley

Dear Ms. Dutschke:

The Chumash Tribe is buying up land all over the Santa Ynez Valley, with expressed plans to add to the Chumash Reservation. These land grabs are to be added to the tribal lands through fee to trust application. The SY Valley is predominately agricultural land. P208-01

The Tribe already has built a large Casino and hotel complex. Those of us who live in the Valley have to live continually with the consequences of these Tribal activities. The Casino prospers, the Valley businesses struggle; the Casino prospers, crimes against persons and property increase; the Casino prospers, the traffic on the local streets and highways increase as do accidents and deaths. P208-02

Many in the Valley would have some peace if the leadership of the Tribe could be trusted, but the history of this leadership is that it can be counted on to be secretive, to be selfish and to be a divisive force in the Valley. *Let them read about it in the paper, after it has already happened*, is how they do business. P208-03

Finally there is the issue of water. No one is an expert on water issues, at best they are amateurs who get paid for their opinion. Two things are for sure: (1) the Tribe doesn't pay for water and (2) the availability of water diminishes year by year. So the Tribe gets free water and the rest of us pay more and more, and then the available ground water diminishes and the farmers' fields, the Valley businesses, and the gardens and trees and the lake all wither. Environment degrades. P208-04

Please listen to Valley residents concerns. Environmental impact is huge. P208-05

Sincerely,

Jane Quigley

Edward A. Quigley
630 Lillebakke Ct.
Solvang, CA 93463
805-688-1241
edwardaquigley79@gmail.com

RECEIVED BIA
2013 SEP 16 P 1:
REGIONAL

Ms. Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Reg Dir ✓
Dep Reg Dir T
Reg Admin Dir
Route Decrms
Response Required ✓
Due Date 9-17-13
Memo ___ Ltr ✓
Tele ___ Other ___

September 3, 2013

Dear Ms. Dutschke:

The Chumash Tribe is invading the Santa Ynez Valley and the surrounding territory and taking prisoners. The invasion is the ongoing attempts at land grabs to be added to the tribal lands and the prisoners are the rest of us in the valley who have to live continually with the consequences of Chumash Tribal activities. The Casino prospers, the valley businesses struggle; the Casino prospers, crimes against persons and property increase; the Casino prospers, the traffic on the local streets and highways increase as do accidents and deaths. P209-01

Many in the valley would have some peace if the leadership of the Tribe could be trusted, but the history of this leadership is that it can be counted on to be secretive, to be selfish and to be a divisive force in the valley. *Let them read about it in the paper, after it has already happened*, seems to be the leadership mantra. P209-02

Finally there is the issue of water. No one is an expert on water issues, at best they are amateurs who get paid for their opinion. Two things are for sure: (1) the Tribe P209-03 P209-04

doesn't pay for water and (2) the availability of water diminishes year by year. The Tribe's notion of responsibility to the larger public is to lay down some asphalt and name the section after themselves, and redoing the local high school football field. That all sounds like something significant, but compared to the plunder that they ring in every week from human frailty, it is nothing much. So the Tribe gets free water and the rest of us pay more and more, and then the available water will diminish and the last folks drinking will be the members of the Tribe and their guests.

P209-04 Cont.

P209-05

P209-06

Respectfully yours,

Edward A. Quigley

Comment Letter P210

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P163.

NELSON E OWENS

[redacted]

RECEIVED
2013 SEP 3: 2
REGIONAL

Reg Dir
Dep Reg Dir
Reg Adm Dir
Route DECRMS
Response Required Yes
Due Date 9-17-13
Memo Ltr
Tele Other

September 7,2013

Amy Dutschke
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento CA 95825

Subject: Santa Ynez Tribe of Chumash Indians proposal to change zoning of 1400 acres of agricultural land located off State Hwy 154 in Santa Barbara County, and place said property in a Trust, owned and controlled by the Chumash Tribe.

Dear Ms. Dutschke:

I am writing this letter as a concerned citizen to protest the proposed plan to remove the above mentioned land from the control of Santa Barbara County .The proposed plan would exempt the land from various taxes. It would have a negative impact the General Plan of Santa Barbara County. This proposed plan would exempt the Chumash from many regulations that all other Santa Barbara County residents are subject to complying with. P211-01 P211-02

If this land was placed into the proposed Trust, The Chumash would have complete freedom to develop this land any way they so desired. This move would have a huge negative impact on the Santa Ynez Valley and its residents, businesses and resources. I feel that the time has come that the Chumash Tribe in Santa Ynez Valley receive no more special considerations. P211-03

Sincerely,

Nelson E Owens

Nelson E Owens

PO Box 1711*Santa Ynez, CA 93460*805-688-7290*nelsoneowens@aol.com

Comment Letters P212 through P228

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P197.

Comment Letter P229

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P163.

Comment Letters P230 through P232

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P197.

Comment Letter P233

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is addressed to Santa Barbara County and not the BIA.

Comment Letters P234 through P244

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P197.

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Annexation

1 message

Gary Charness <charness@econ.ucsb.edu> Tue, Sep 17, 2013 at 10:23 PM
To: Chad.broussard@bia.gov

Dear Mr. Broussard,

I am deeply about the proposed Camp 4 annexation. Removing this large amount of land from the tax rolls (especially given the development that would ensue) and providing infrastructure and fire services is financially catastrophic. Further, this will depress real estate values in the proximity and will leave the government with considerable potential liability in the inevitable lawsuits.

P245-01

I personally don't think that a group of any people should be permitted to buy land in a completely separate area and annex it and then convert it to their own use.

Some additional and compelling comments are made below.

1. The Chumash plan to provide their own waste water treatment plan. Camp 4 sits atop of the aquifer that supports a significant portion of Santa Barbara County. Who would represent the **whole** population that relies on that water in terms of oversight of the proposed Chumash waste water treatment? P245-02
2. The following representation is made: **No gaming would occur on the subject property**. The Chumash obtained 2 gaming permits....they have used only one to date. It would be negligent for your analysis of the EA to ignore the potential construction of a casino on Camp 4/TCA land. P245-03
3. The following is stated: **The County, Solvang/Santa Ynez Sheriff Substation provides general public safety and law enforcement service for the project area. The Sheriff Substation is located in Solvang, approximately three miles from the project site. It provides 24-hour service to the Santa Ynez Valley and Solvang area.The County Fire Department (Fire Department) provides structural fire protection services to the project area. The Fire Department protects primarily residential areas, and responds to calls for structural fires as well as medical emergencies.** The Chumash have said they would be willing to pay $10 Million to compensate the County for the loss of tax revenue from Camp 4. The $10 Million in no way provides adequate compensation for the in perpetuity loss of tax revenues if the 1,400 acres is taken in Trust, let alone addresses the significant new demands the existing County law enforcement and fire services that would result from the proposed development of this now virtually undeveloped pristine land. P245-04
4. The following is stated:**To meet increased demands, the Tribe would develop an on-site water supply system using groundwater.** There is no information as to how the potential increased demand, let alone the stated increased demand will impact all of the existing and future needs of all of the populations who are dependent upon the aquifer. P245-05
5. The following is stated: **Existing access roads would be improved and new roads constructed to provide access to the proposed residences and existing agricultural operations.** The EA does not speak to the impact of the additional traffic that would result from the stated proposed development of Camp 4, let alone the potential development that is NOT addressed but reasonably anticipated to fulfill the economic opportunities the Chumash have stated will be provided to allow **"the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises."** (Page 1-7) P245-06
6. The following is stated: **"All identified wetland areas and California Live Oak would be avoided to the maximum extent feasible."** The term "feasible" is subjective. Although not bound by State and local laws on Trust lands, the Chumash have voted on State and local measures on their ballots. State and P245-07

local laws have been enacted specifically to protect wetland areas and California Live Oak for the enjoyment of OUR future generations. "We the people" - including the Chumash - have eleveted the future value of these environmental protection objectives over all other potential uses of the land on which they are located. P245-07 (Cont.)

7. The following is stated: **"The tribal facilities would include development of a banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, and a tribal community space including ceremony room and gymnasium....Approximately 400 parking spaces would be provided for the facilities."** Nowhere in the 930 page EA does the Tribe address the environmental impact, let alone the broader community impact, of the use of a facility on Camp 4 that necessitates 400 parking spaces. The proposed "community event facilities are stated to encompass nearly 80,000 square feet!. (page 2-14). Santa Ynez Valley residents already are gravely concerned about and pursuing laws to regulate and restrict the number of special events that may be hosted at wineries and other privately owned facilities due to the traffic, light and sound pollution, and other negative impacts caused by these events. P245-08
8. The following is stated: **"Impacts to biological resources would be greater under Alternative A due to the size of the assignments. Under Alternative A, approximately 330.11 acres of critical habitat for a protected species would be removed from designation. Under Alternative B, approximately 65.28 acres of the critical habitat would be removed from designation. Both alternatives would adversely impact water of the U.S., special-status species, protected oak trees, and migratory birds without the implementation of mitigation."** The Chumash concede that their proposed developments for Camp 4 adversely impact biological resources, protected species, protected trees and migratory birds. It is your obligation to determine, as a matter of fact, that the proposed development of Camp 4 by the Chumash warrant these adverse consequences. P245-09
9. The following is stated: **"No adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative..."** This is a broad conclusion...not a statement of fact. Mr. Broussard, please fulfill your duty to exercise your own due diligence so that you may come to your own conclusions as to what adverse impacts would result from the pursuit of either Alternative A or Alternative B. Please review Alternative A and Alternative B against the background of the Santa Ynez Valley Community Plan. P245-10
10. The following is stated: **"A project that would induce "disorderly" growth (i.e., would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts."** The County has spoken to what is deemed to be "orderly growth". This statement is incorporated in the Santa Ynez Valley Community Plan. Neither Alternative A nor Alternative B are incorporated in the county's vision of orderly growth. P245-11
11. The following is stated: **"No significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B."** Please exercise your own due diligence and do not merely adopt these conclusions. The term "significant" is highly subjective, and it is extremely significant to non-Chumash majority members of this community that any development of Camp 4 have minimal detrimental impacts on our use and enjoyment of our home. P245-12

Sincerely,

Dr. Gary Charness
763 Alamo Pintado Rd.
Solvang, CA 93463
charness@econ.ucsb.edu

Comment Letters P246 through P253

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P207.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Degradation of Camp 4 land

1 message

Kyle Abello <kabello@ucsd.edu> Wed, Sep 18, 2013 at 1:34 PM
To: chad.broussard@bia.gov

Dear Mr. Roussard,

I would urge you to reconsider the numerous irreversible environmental impacts that would occur on the Camp 4 property were annexation approved and residential development moved forward: drawing down the aquifer that the rest of the Valley residents and natural flora and fauna rely on, the lack of nearby waste treatment for the effluent generated by these homes, destruction of vernal pools on the property, additional traffic concerns from a development of this size, damage to watershed area that flows directly to the Santa Ynez River, possible commercial development that would increase negative impacts by increasing the numbers of people visiting the fragile Oak/Meadow ecosystem on the property, and the general degradation of biological resources. P254-01

Please convey my opposition to the placing of this property in trust and removing the protections that Santa Barbara County has put in place with the Santa Ynez Valley Community Plan to ensure that the environmental resources and rural character of the Valley will be preserved. P254-02

Sincerely,

Kyle Abello
2859 Stadium Dr.
Solvang, CA 93463

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

The BIA should reconsider Camp 4 Annexation

1 message

Donald Carter <jcdbo@comcast.net> Wed, Sep 18, 2013 at 2:46 PM
To: chad.broussard@bia.gov

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs

Dear Mr. Broussard,

I am concerned with the impact on Santa Barbara County water resources from the proposed Camp 4 development by the Chumash tribe near Santa Ynez. My two concerns are as follows: P255-01

Additional stress on a limited resource - The project will impact the same aquifer that supplies nearby communities as well as much of Santa Barbara County. Section 2.2.5 of the Camp 4 Environmental assessment states that 2 new groundwater wells will be required to meet the estimated 360 acre-feet per year. That is greater than Solvang city's upland wells use now and compares to the 373 acre-feet used in 2002 when ground water was more abundant. If this proposed development was not going before the the BIA, but was instead going to the county for approval, the significant impact on county water resources would be considered. P255-02

Impact of waste water from Camp 4 - On page 2-3, Table 1, of the environmental assessment waste water treatment is to be onsite. I am concerned with who oversees and regulates waste that returns to the ground water passing under Camp 4 from onsite plant. Like water usage, waste water treatment should fall under the jurisdiction and regulation Santa Barbara county. P255-03

The environmental assessment for Camp 4 falls short of addressing the diminishing water resources that all Santa Barbara county residents must help preserve. P255-04

Thank you for your consideration.

Don Carter
Judy Carter
2878 Quail Valley Road
Solvang, CA 93463
805-691-9350

jcdbo@comcast.net

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Valley/Camp Four

1 message

Julie Benson <julie@paninoinc.com> Wed, Sep 18, 2013 at 3:35 PM
To: chad.broussard@bia.gov

>>
>> Dear Sir: I am one of many living in the Santa Ynez Valley very concerned about the proposal of the Chumash here to annex Camp Four (or any more of the Santa Ynez Valley). Camp Four, in particular, is a main entrance to the "Santa Barbara Wine Country" - something that is becoming ever more important to the economy of the entire county. I am sure you are aware of the potential problems with the proposed waste water treatment plant, ground water concerns, the fire and police issues and the many unknown results of the development the Chumash propose. Ten million dollars will not remotely pay for the long term cost but even if the Tribe offered more it could not mitigate the major change their plans would have on the Valley. The relatively few members of the Chumash tribe derive very, very large sums from the existing casino and hotel. There can be no justification for the tribe taking over 1400 acres of the Santa Ynez valley and making it part of their reservation. The Chumash own it and are free to develop it according to the existing zoning. The reason the Santa Ynez Valley is such a desirable place for us to live and for others to visit is in no small part because of careful attention to how it has been developed in the past. Please help us to maintain this very lovely place.
>>
>> Sincerely,
>>
>> Julie Benson
>> P.O. Box 158 (2723 Grand Ave.)
>> Los Olivos, Ca. 93441
>

P256-01

P256-02

P256-03

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 annexation

1 message

Brandon Amyx <bamyx@montecito.com> Wed, Sep 18, 2013 at 3:42 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Mr. Broussard,

I am writing to ask my government to decline the Chumash application for annexation of the 1,443-acre "Camp 4" property into their nearby reservation on the basis that the environmental impacts on this land will be significant and irreversible. These are not your great, great, great grandfather's Indians, who would never dream of the scope of the development that the Chumash have planned for this land. P257-01

As a Santa Ynez Valley resident, I've witnessed the environmental impact of the gaming monopoly held by the tribe. The impacts include traffic congestion, litter, noise, and loss of aesthetic beauty. The Camp 4 property sits at the intersection of our two highways. The size and scope of the proposed development will only add to these unfortunate issues. P257-02

Because of the small size of our community and valley, a project of this scope will have a dramatic and permanent impact on our bucolic character. I don't want to halt all development in the valley. Rather, I believe that the environmental, land use and building codes that have been developed over time for traffic impacts, building materials usage, setbacks, view protection, wetland protection, native/invasive species protection, etc, are well considered and should be evaluated carefully with any project, let alone one of this magnitude. The Chumash are very wealthy. They no longer need a leg up from our government at the expense of our land or laws. They certainly don't have a right to develop land outside of the established approval process. They should be bound by the same rules that govern the behavior of their neighbor on the other side of the fence. P257-03

It is astounding to me that I have to write a letter like this. What could have possibly gone so wrong that our government would even consider a proposal that would permanently give up jurisdiction over this much land that is neither contiguous to a reservation, nor needed for housing purposes by a small group of individuals that receive more than $400,000 each per year? Please consider the scope of their proposed project, the potential environmental impacts of unregulated development, and the sovereignty of our nation against threats foreign and domestic. P257-04

Regards,

Brandon Amyx

Santa Ynez Valley resident

Comment Letter P258

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P207.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Chumash Indian Annexation application

1 message

David and Lauren Watts <watts1903@hotmail.com> Wed, Sep 18, 2013 at 4:53 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Dear Mr Broussard,

I stand in opposition to the Camp 4 Annexation application filed by the S. Y. Band of Chumash Indians. Our valley and county have gone to great lengths to plan the development of our area with the recently enacted Santa Ynez Valley Plan and other instruments. Granting this application would give carte blanch development authority to a tiny tribal government which has already demonstrated the ability to overgrow their own boundaries with little regard for sanitation, runoff, water resources or traffic. The Camp 4 area is currently used strictly in agricultural pursuits which are complimentary to our Valley Plan. The Chumash Tribe could, if allowed to take this land in 'fee to trust' by your Bureau, continue their pattern of massive overdevelopment. This over- development may result in a large scale overdraft of ground water in an area already in the throws of a drought. The Chumash Casino has also exhibited a pattern of incremental increase in their promotion of alcohol at their facilities which disregard the local crime increases and traffic fatalities on our highways. P259-01 P259-02 P259-03

The Chumash tribe is not an island. The unrestricted growth of otherwise agricultural land in the same pattern as shown above could be an environmental and safety nightmare for their neighbors and Santa Barbara County.

Please reject this application.

David K. Watts
1903 Old Mission Drive
Solvang, CA 93463

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Concerns--Chumansh Camp 4 annexation application

1 message

Michael A. Dunn <madunn@sbceo.org> Wed, Sep 18, 2013 at 4:58 PM
To: chad.broussard@bia.gov

Dear Mr. Broussard,
I am writing to you to express my many concerns that the Chumash 'Camp 4' annexation would have upon the population of the Santa Ynez Valley, if allowed. P260-01

First, the stated development plans to tap into an already fragile and high demand aquifer for its water needs. Indeed, the annexation would allow for many types of development not in keeping with our Santa Ynez Valley Community Plan or our WATER SUPPLY. Please deeply consider what negative impacts the potential growth could be with respect to our finite natural resources. P260-02

TRAFFIC is also a concern. I've driven the main feeder road for the existing casino for thirty (30) years and I have witnessed a significant increase in traffic, accidents and drunk driving arrests specifically associated with casino traffic. Increasing the development as dramatically as allowed under the annexation application would definitely have an impact on AIR QUALITY, SAFETY, INFRASTRUCTURE (ROADS) and LAW ENFORCEMENT. Please weigh your decision against these threats to our environment and safety of our traveling residents. P260-03

SEWER/SEPTIC is an issue for many valley areas and, in fact, has led to "special problem" areas especially with regard to WATER QUALITY. Again, with the potential growth, not in keeping with the Santa Ynez Valley Community Plan, that Alternative A and B of the annexation application could result in, please consider the very detrimental effects on the health of our water quality and thereby our population. P260-04

If this was your home, Mr. Broussard, where you and your family lived, I am certain you would not want your representative to simply "rubber stamp" this application, as proposed, for all of the reasons above. P260-05

Thank you for your analysis and sincere consideration,
Michael Dunn
P.O. Box 774
Los Olivos, CA 93441

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

The Recent TCA approval

message

Sheila Benedict <sheila93460@gmail.com> Thu, Sep 19, 2013 at 3:18 PM
To: chad.broussard@bia.gov

Hello Mr. Broussard,
The vast majority of residents of the Santa Ynez Valley STRONGLY opposed the TCA that was approved by the BIA recently and I want to add my voice to the protest. It is inconceivable to understand how in addition to the 1400 acre property, known as Camp 4, the TCA includes 11,000 acres of privately owned properties, residential and commercial, many roads, even our local airport. The impact on the residents of this area would be literal destruction of citizens rights. It would affect schools, recreation, tax collection, water rights and availability, businesses, and private property rights. I strongly encourage you to listen to the residents of this area and reverse the approval of the TCA. Our Santa Barbara County Board of Supervisors has filed an appeal and please tell the members of the BIA to respect the opinion of our supervisors and the people they represent.

P261-01

BRIAN KRAMER
Rancho Estates, Santa Ynez, California 93460

September 17, 2013

Reg Dir ald ✓
Dep Reg Dir T K
Reg Adm Ctr
Route DecRms
Response Required Yes
Due Date 9-25-13
Memo Ltr ✓
Tele Other

SENT VIA FACSIMILE & U.S. MAIL
FACSIMILE NO. (916) 978-6099

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

Chad Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

Re: Environmental Assessment for Camp 4 Property
Santa Ynez Band of Chumash Indians
Santa Barbara County, California

Dear Ms. Dutschke and Mr. Broussard:

My wife and I reside in Santa Ynez Rancho Estates which is a rural residential neighborhood contiguous to and east of the 1,433 acre Camp 4 property. The Environmental Assessment (EA) for the Camp 4 project raises many environmental concerns and leaves many questions unanswered concerning the major environmental impact the construction of 143 residences of 3,000 to 5,000 square feet over an estimated 4 to 9 year period will have on the subject property, the surrounding community and the Santa Ynez Valley. It appears this project will have a significant negative environmental impact if the proposed development goes forward. We request an Environmental Impact Statement (EIS) be prepared to address all of the physical and social impacts of the proposed development. P262-01 P262-02

Before any consideration is given to the application for land to be placed into federal trust, all environmental impacts should be addressed in an Environmental Impact Statement. The construction of 143 residences, among other things, in a concentrated area that has been traditionally agricultural or rural will have a major impact on the surrounding area and it requires further study. Placing the privately owned Camp 4 property into federal trust and removing it from County jurisdiction regarding land use will have a significant negative environmental impact on the property and the surrounding community. P262-03 P262-04

The proposed project is inconsistent with and contrary to the Santa Ynez Valley Community Plan adopted in 2009. The project will negatively impact the environment and place an unreasonable burden on the local infrastructure and surrounding community. The alternatives presented will adversely impact the environment by causing the removal of at least 50 to 70 protected mature and majestic oak trees (70 trees under Alternative "A" and 50 trees under Alternative "B"). The remedial measures proposed for the removal of these protected oak trees are inadequate as these mature oak trees cannot be adequately replaced. P262-05 P262-06

The proposed project will adversely affect jurisdictional waters of the United States, as defined by Section 404 of the Clean Water Act, through the discharge or fill of at least 2.28 acres of ephemeral drainages, seasonal wetlands and seasonal wetland swales on the property. The proposed project will forever change the contour and drainage of the property. The remedial measures proposed are inadequate and further study is required. P262-07

The proposed project and its construction activities will result in the disturbance of nest sites for migratory birds and birds of prey through increased ambient nosie and increased human activity that will result in abandonment of active nests. The noise and human activity on the proposed project will also have a harmful affect on nest sites on adjoining property and the surrounding community. The remedial measures proposed are inadequate and further study is required. P262-08

The proposed project will adversely impact Vernal Pool Fairy Shrimp (VPFS) habitat which is federally protected. Implementation of Alternative "A" will impact at least 330.11 acres of designated critical habitat for VPFS which will adversely impact VPFS. The remedial measures proposed are inadequate and further study is required. P262-09

The prolonged and ongoing construction will have a major environmental impact on the surrounding community, especially on the residents east and downwind of the project. An increase in noise and negative air quality will result from the construction activities. The EA offers no mitigating measures for the negative impact noise and construction activity will have on nearby residents, including their livestock, pets and wildlife. The construction impact on local residents and the community requires further study. P262-10

The EA's proposed alternatives for residential construction reveal residential construction immediately adjacent to the present private homes located immediately to the east of the Camp 4 property. Alternative "B" proposes 143 one-acre lots which is not consistent with the surrounding neighborhood. The lack of setbacks, local zoning or local oversight will cause a major impact on the properties adjacent to the Camp 4 project, including potential for excessive noise, pollution, nuisances, view impairment, etc. P262-11

The Camp 4 property is bordered on the north and south by rural scenic country roads, i.e., Baseline Avenue to the north and Armour Ranch Road to the south which are considered scenic rural roads. No view corridor is provided along Baseline Road or Armour Ranch Road such as the "view shed protection zone" provided along SR-154. Despite Baseline Avenue and Armour Ranch Road being scenic roads, the proposed residential development is contiguous to the roadways thereby impacting the scenic aspect of the roadways. The lack of adequate setbacks is not addressed in the EA. Further study is required. P262-12

Both alternatives for residential development show access off of Baseline Avenue and Armour Ranch Road. These rural county roads are narrow and lack a paved shoulder or any significant shoulder. These roads are commonly used by bicycle riders, joggers and horseback riders as well. The EA indicates construction will involve grading and excavation for building pads and roadways and "cut and fill" and "structural grade fill" may be imported to meet engineering requirements. The trucks bringing building supplies and land fill will create traffic, noise and safety hazards along Baseline Avenue and Armour Ranch Road. Moreover, the delivery times for construction materials and arrival and departure of project workers will correspond to the morning and afternoon peak traffic volumes for local residents. These local roads will become a breeding ground for traffic noise, delays and accidents if construction begins. The adverse impact of construction related traffic requires further study. P262-13

The increase in traffic from the creation of a new 143 resident community, along with its anticipated activities, will most likely lead to signalization at SR-154's intersections with Armour Road, Edision Street and Roblar Aveune, among others. This increase in traffic will have a negative impact on the surrounding area and the Santa Ynez Valley. Although the Tribe offers to pay a "fair share" contribution for the cost of signalization and road modification to SR-154, the increase in traffic effectuating signalization and road modification is solely caused by the project. Increases in traffic and signalization will adversely impact the area and further study is required. P262-14

Then there is the issue of what actually will be constructed on the project in the event the current private land owner of Camp 4 is not subject to local land use requirements or procedures by which the rest of the community is governed. It is difficult to fully respond to the EA as it is not clear what actually is being proposed or what will be constructed. Is it Alternative A? Alternative B? Or something else in the future? As mentioned above, Alternative "B" offers 143 one-acre lots abutting the rural roads and/or the adjacent residential community which is not consistent with the surrounding area. No matter what Alternative is considered, it will have an adverse environmental impact and it will forever change the environment, landscape and scenic nature of the land. P262-15

An Environmental Impact Statement is warranted and is needed to address the issues raised in the Environmental Assessment (EA). P262-16

If you have any questions concerning this matter, please do not hesitate to contact me at my office located at 1230 Rosecrans Avenue, Suite 410, Manhattan Beach, California 90266. P262-17

Thank you for your courtesy and cooperation in this matter.

Very truly yours,

Brian Kramer

cc:

U.S. Congresswoman Lois Capps
California Senator Dianne Feinstein
California Senator Barbara Boxer
S.B. County Supervisors:
Dorren Farr (Fax: 805-568-2883)
Salud Carbajal (Fax: 805-568-2534)
Janet Wolf (Fax: 805-568-2283)
Peter Adams
Steve Lavagnino (Fax: 805-346-8404)

Dear Ms. Dutschke

I am writing concerning the chumash camps 4 plan. Since I just had hand surgery, I am hoping you will take the time to read the article I have inclosed since it replects what I and many other valley residence feel about the proposed expansion. P263-01

Thankyou

Sincerely

Charlotte and John Valastro

3126 Horizon Dr.

Santa Ynez, Ca. 93460

RECEIVED BIA
2013 SEP 1 PM 3:2
REGIONAL

Reg Dir ded ✓
Dep Reg Dir TK
Reg Adm Ofer
Route DecRms
Response Required yes
Due Date 9-23-13
Memo Ltr ✓
Tele Other

Who is an Indian tribe?

James E. Marino

The author is an attorney in Santa Barbara.

Once again Andy Caldwell writes as a de facto champion of the community of Indian descendants operating the hotel and gambling casino at Santa Ynez. He apparently wasn't aware or chose to ignore the fact that they only began calling themselves "Chumash" about 10 years ago. Before that they were the "Indians at Santa Ynez," then the Santa Ynez Band of Mission Indians.

Contrary to well recognized journalistic ethics, he fails to disclose his personal and financial connection to the casino through his special interest organization calling themselves COLAB, the Coalition of Labor, Agriculture & Business.

His most recent comments in essence infer that many Santa Ynez Valley residents are merely envious of the millions of dollars this 150-member group takes in from the losses of gamblers, money taken in from gambling addicts and from many folks who cannot afford to lose that money. Nowhere in his articles does he even mention the key issues involved in the ongoing dispute in the valley existing with the current tribal government.

Under existing federal law, an Indian is anyone a federally acknowledged tribe says is an Indian by simply enrolling them in a tribe, and these [illegible] practices are not policed by any outside authority and cannot be challenged in court. A "tribe" is whomever the federal government says is a tribe.

There is now an acknowledgment process for establishing the existence of real American Indian tribes by applying seven mandatory criteria that must be met. These were established because many small groups claiming Indian ancestry were seeking federal acknowledgment as a tribe to receive the federal welfare, grant monies and other benefits provided only to bona fide acknowledged Indian tribes.

At a recent meeting in Solvang, representatives of the Department of Interior disclosed proposed changes to this rule in an effort to make it even easier for a group or community of Indian descendants to establish themselves as an acknowledged Indian tribe.

Once the federal and state governments legalized casino gambling for federally acknowledged Indian tribes in 1988 by federal law, and in 2000 under California law (whether they

Please see MARINO on [illegible]

Residents' concerns not based on envy

MARINO

Continued from Page G1

were correctly acknowledged or not), the number of heretofore unknown tribes applying for acknowledgment increased greatly. Some of the benefits that result from the status of an "acknowledged tribe" are the right to take land into trust and to operate a gambling casino.

Fee-owned land, taken into trust by such a tribe, no longer can be taxed to pay for all the public services and infrastructure used regularly by a tribe, its government, its members and all the customers patronizing the tribal businesses. The costs and demands must then be made up by the rest of the non-Indian taxpayers, the vast majority of whom are not making over half a million dollars each year like the Santa Ynez tribal members.

In addition to the many [illegible] taxes that all [illegible] Indian businesses and taxpayers must pay, trust status prevents the tribe, its members and officers, its businesses and employees from being sued for any misdeeds or violations of laws no matter how outrageous they may be.

Lastly, trust status removes the tribe from the thousands of state and local laws and rules enacted to protect the community, the customers patronizing any Indian business and any employee working for the tribe. Although the U.S. Supreme Court opined in a 1988 case that this legal immunity doctrine created by a series of court decisions should be eliminated in this day and age where tribes are operating huge profitable businesses, open to the public and employing thousands of non-Indian employees all over the country, in the end, the court left this antiquated doctrine to be eliminated by Congress. That was 13 years ago and nothing has happened yet.

So the concerns of valley residents about the legitimacy of the Santa Ynez band is about their status as a federally acknowledged tribe, not just as a group of fractional Indian descendants living in the area for decades and calling themselves a tribe, but as a lawfully created and acknowledged tribe using the mandatory criteria required. That is not a concern based on "envy." It is based on the manner in which these powerful legal rights and privileges were created and are being regulated.

Under current federal law and federal agency practice, they are effectively unregulated. Such a tribe can remove land from the control and taxing authority of local government, operate outside of state and federal constitutions and the thousands of existing laws, and basically do whatever they want on that land — and the citizens can do nothing about it and the federal government chooses to look the other way.

Agreements made with local governments and businesses are largely unenforceable in any court of law, rendering the operations of Indian businesses virtually lawless, unpoliced and unregulated by anyone.

So before Mr. Caldwell infers that the motivation of the thousands of valley residents in opposing many of the lawless activities of the Santa Ynez band is based on "envy" or some kind of "NIMBY-ism," he should at least inform himself of the real issues and disclose his and COLAB's connections to the current tribal government and their gambling casino.

Comment Letters P264 through P267

Comment Letters P264 and P265

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P163.

Comment Letter P266

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter P248.

Comment Letter P267

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter P258.

DELLA CASBERG-DEATS
2750 N. Refugio Rd.
Santa Ynez, CA 93460
(805) 688-6074

September 16, 2013

Amy Dutschke, Regional Director
Department of Interior, Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke,

As a citizen with roots in Santa Barbara and specifically the Santa Ynez Valley since 1956, I beseech you to refrain from support of Chumash Tribal Council Annexation of Camp 4, (1400 acres) off Armour Ranch Road in the Santa Ynez Valley.

The attempts to garner all possible tangential support in circumventing this local community's clearly spoken and majority negative response to this very significant "Fee to Trust" issue, has been without precedent. P268-01

The economic benefit to Chumash as individuals and local and surrounding communities in job potential is clear. Less clear is that some of the many charitable contributions by the Chumash, is in fact the mandate of their compact with the State of California as mitigation to gambling's very significant negative impacts in our local communities. P268-02

Having been vocal and clear in my pleasure that my friends and school classmates and my children's friends and classmates in the tribal community now enjoy a very enviable livelihood and quality of life, I must voice "enough". This is not an impoverished segment of our community, nor are their opportunities for housing limited by their reservation boundaries. When housing is needed, these individuals can and do afford any home of their choice in our valley. P268-03

There is no reasonable benefit to the Tribe being able to circumvent County Zoning, County Planning or County General Plan designations for this land. Yes, they purchased it fair and square for a sizeable expenditure! They purchased it knowing it's land uses and agricultural zoning. Many other owners have fought long and hard over the past two General Plan processes to prevent downzoning on their large ranch properties....to no avail. The General Plan is to protect us all with rules and guidelines for development. Annexation brings Sovereignty and negates all community guidelines and protections for itself. P268-04

We have seen an attempt to annex through special legislation and with petitions for support for annexation presented to neighboring community governments....folks not impacted by our very real increased traffic and increased crime. While spokesmen for the Tribal Council continue to profess that casino expansion is not "in any way a part of their plan", ANY land use WOULD be within their SOVEREIGN ability and control if this land were to gain Fee to Trust designation through special legislation or Bureau of Indian Affairs action. P268-05

Now we are presented, de novo, with a TCA!! Thankfully, the Santa Barbara County Board of Supervisors has listened to our community and stepped up to Appeal this action. The BIA is wrong on the history, wrong on the law, negligent in scrutinizing the tribe's assertions, in violation of the National Environmental Protection Act and negligent in noticing ANY, nor vested parties. Unprecedented! P268-06

Sincerely,

Della Casberg Deats

Della Casberg Deats

Comment Letter P269

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P268.

Comment Letter P270

1140 N. Refugio Rd
Santa Ynez Ca
93460

September 19 2013

Dear Sirs:

This letter states total opposition to the proposed fee-to-trust acquisition of the 1400 acre property known as "Camp 4" by the Chumash Tribe.

Because of their gaming income they all have every opportunity to build homes on this property, as it stands within Santa Barbara County's permits and fees. They do not need special protection and I cannot afford to help them get it. P270-01

Patricia Hunter
J. Bart Hunter

Comment Letter P271

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P31.

Comment Letter P272

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P249.

Broussard, Chad <chad.broussard@bia.gov>

Shepherd Easement Letter to BIA

1 message

Gerry Shepherd <shepherd@west.net> Mon, Sep 30, 2013 at 12:40 PM
To: chad.broussard@bia.gov

Hello, Mr. Broussard,

Attached is a copy of my letter mailed today to Regional Director Amy Dutschke.

Gerry Shepherd

shepherd@west.net

605-688-3120

SCAN_DOC0001.PDF
28K

SHEPHERD FARM

September 30, 2013

Ms. Amy Dutschke, Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Re Comments –due October 7, 2013
Environmental Assessment Portion of
Santa Ynez Band of Chumash Indians Camp 4 Fee-To-Trust Application

Dear Ms. Dutschke:

The following comments are submitted regarding the subject Camp 4 Environmental Assessment.

P273-01

1. Page 2-4 states: "No gaming would occur on the subject property." The Chumash have utilized only one of the two gaming permits issued to their tribe. The possibility of a casino on the subject property is very real. The BIA would be negligent in not considering this potential in your EA.

P273-02

2. Page 2-8,et al, including "Roadways" fails to identify, define and consider existing road easements on the property. In particular, it fails to identify, define and consider the adverse condemnation of an existing 40' x approximately .5 mile road easement on parcel 1 (APN 141-121-51). This easement was defined and granted to our family in 1955.

The BIA/Regional Director Dutschke must require the elimination of all liens, encumbrances or infirmities prior to taking final approval action of this fee-to-trust acquisition. BIA/Regional Director Dutschke has not given notice or contacted the Shepherd family regarding the elimination of or the ensuring of the recorded easement. Transferring this land into trust without directly contacting easement owners represents a *"taking or inverse condemnation"* without due process or just compensation.

Elimination of this easement land-locks 80 acres in the private ownership of the Shepherd family making this land unmarketable. Land-locking this property devalues it, making it worth pennies on the dollar.

This fee-to-trust creates irreparable harm.

P273-03

Respectfully submitted,

Gerry B. Shepherd

Copy via email: chad.broussard@bia.gov

1400 Highway 154 ▪ PO Box 30 ▪ Santa Ynez, CA 93460
805-688-3120 ▪ FAX 805-688-0505 ▪ shepherd@west.net

Broussard, Chad <chad.broussard@bia.gov>

Chumash Annexation of Camp 4 Property

Tafelski, Mark Corporate Tecolote <MTafelski@tecolote.com> Fri, Sep 20, 2013 at 3:21 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

I have been resident of Los Olivos for 25 years and have heard about the possible purchase of the Camp 4 property by the SYV Band of Chumash Indians, the actual purchase of the property and now the annexation of the property to the Reservation. I am not involved with any of the organizations opposing the annexation and unfamiliar with what annexation even means. I have friends of both sides of this and understand their positions. One item I have not heard raised in discussions is ownership of the mineral and water rights on the property. Although I do not know for certain, I would imagine that when the reservations were established way back when that the Indians were granted mineral and water rights for that which lies beneath their property. Unlike many valley residents, we do not own any mineral or water rights beneath our property. If Camp 4 is annexed, what becomes of the mineral and water rights beneath that property. Will the SYV Band of Chumash Indians be able to pump any unregulated amount of water that they feel fit to "support their needs" and what is the potential devastating effects to surrounding property and water availability. I bring this issue up because I have not yet heard this discussed. Since we are currently in a drought and our main reservoir at ~50% capacity, would like to have this addressed. If it is true that the SYV Band of Chumash Indians will retain all mineral and water rights, what controls are in place to mitigate damage to our wells and water sources. P274-01 P274-02

I write to you requesting that you investigate and respond so that our Santa Ynez Valley does not have a situation similar to that of the Barona Indian Tribe in 2003 found at the link below.

http://www.citizensalliance.org/Major%20Issues/Indian%20Gaming%20Issues/Tribal%20Gaming%20Funds%20Rights%20Issues%20%20.htm

Sincerely

Mark Tafelski

PO Box 534

Los Olivos, CA 93441

805-688-7810

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Santa Ynez, CA

1 message

Jon Quirt <jonquirt@gmail.com> Sat, Sep 21, 2013 at 6:53 AM
To: chad.broussard@bia.gov

Dear Mr Broussard,

I am writing to you to express my concern over the Environmental Assessment (EA)submitted with application for Camp 4 in Santa Ynez CA by the Chumash Tribe of Indians.

My concern is that water rights have not been fully addressed.(pages 2-7) Camp 4 sits atop a large aquifer and the entire community depends on it.

In the EA there is no assessment of how the additional water demand would affect the community.

For this reason I ask that you set aside the EA for Camp 4

Sincerely,

Jon Quirt
195 MEadowlark Road
Santa Ynez, CA 93460

P275-01

Comment Letter P276

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P207.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Annexation

1 message

Carol Petersen <camp22@comcast.net> Tue, Sep 24, 2013 at 3:39 PM
To: chad.broussard@bia.gov

Dear Mr. Broussard,

I am writing regarding the possible annexation of Camp 4 in the Santa Ynez Valley.

I am a life long resident of Solvang, my great-grandparents coming to the valley in 1911. I grew up with kids from the reservation and was proud to call them my friends. I have seen many changes in the valley in my 64 years. This possible annexation of Camp 4 is by far the most disturbing change I have ever imagined. My concerns range from the lost of such beautiful land to homes as it does to the environmental and infrastructure for the valley. P277-01

Other concerns include water, sewer, traffic, demands on police, hospitals and roads, all of which the tribe will not be contributing to as they will not be part of the tax roll if annexed. P277-02

I have no problems with the tribe conducting business as any other land owner in the valley, following the rules we must all abide by, put in place for our protection as well as the protection of this amazing valley we live in, for us and future generations to come.

In tribe has supported many worthwhile organizations and events in the valley. I personally appreciate it and hope they will continue, being the largest and most successful business in the valley, it is a responsibility that they have stepped up to and accepted. But I would happily forego all this to keep this beautiful place intact for many generations to enjoy in the future. P277-03

This intended project would have a huge impact on our valley, I sincerely hope you will consider this when making your decision. Just how long do we have to pay for the sins of our fathers? I think it has been long enough. P277-04

Sincerely,

Carol Petersen

73 Manzanita Dr.
Solvang, CA 93463
(805) 688-8617
camp22@comcast.net

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Annexation & TCA Opposition

message

Eric Baumgarten <ericbaumgarten@hwy246.net> Wed, Sep 25, 2013 at 5:13 AM
To: chad.broussard@bia.gov

Mr. Chad Roussard:

I am writing to give you my thoughts on the Santa Ynez Band of Mission Indians (Chumash) attempt to annex the 1443 acres (Camp 4). As I am sure you know, this property has been zoned for 100 acre minimum parcels. While we live approximately 3 miles from to this land, there are a lot of ranches that have been bought and developed assuming this zoning would hold up. Clearly they will be significantly damaged (environmentally and financially) if the Chumash even do just what they say they will do. I am sure you have heard from others that the citizens of the Santa Ynez Valley are very concerned that the development plans once they have control will be significantly greater than the initial plans. No matter what they do the citizens of our area will have no say; the County of Santa Barbara will also have no say and will receive no ongoing permit fees and taxes from this property. No matter what they do, there will be significant strains on the environment and on our governments budget to take care of all of the people this development will bring to the Valley. P278-01 P278-02

We live in a ranch development North of Camp 4. We, as well as several hundred other ranches, are dependent on our own water wells to provide water. We are all using the same aquifer that Camp 4 uses. With just the development they are talking about we are concerned that we may have a significant reduction in our water supply to the point that we may not meet our minimum water requirements. P278-03

Over 90% of the citizens in this Valley are adamantly against the kind of development that the Chumash are talking about. Their current casino has already brought traffic and people of questionable character to the Valley. As you may know, there are very few members of the Chumash tribe who will participate in this development. Each member already makes well over $300,000 a year which puts them in the top 5% income bracket in the Valley. They have done very well with the current casino and have bought several large properties in the Valley. We certainly do not mind them using their money to buy properties as long as they follow the same rules the rest of us have to follow. I see no reason why it would be considered fair to give them more privileges to avoid taxes which will ultimately have to be paid by those of us who have less resources than they do. P278-04 P278-05

I have not addressed the 11,000 are Land Consolidation & Acquisition Plan since I have only recently been aware of it. How did something like this ever get approved without informing the people who it will affect? Has anything like this ever been done before???????? If this plan goes forward, it will RUIN the Valley. We already know several people who are going to move before this gets publicized. What are the people at the BIA thinking when they approved this? Most of the land is developed and many people have their life savings in their property. The property values in the 11,000 acres will go down significantly when this is finalized. Surrounding properties will also see significant declines in property values. I strongly request that this plan be abandoned or at least postponed until you and we can get a better understanding of what the consequences will be. P278-06

Eric Baumgarten

PETER VAN IDERSTINE

282 White Oak Rd. Santa Inez, CA 93460 805-688-0257

September 25, 2013

Chad Broussard
Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, CA

Re Chumash Camp 4 Annexation

Dear Mr. Broussard,

I own five acres of land close to the Camp 4 property and I am strongly opposed to the annexation for several very important reasons. P279-01

1. I am on the Meadowlark Water Board and ground water is limited in this area. One hundred houses, or worse yet a major casino, would cripple the water supply. P279-02

2. The Chumash are proposing 400 parking spaces. The contaminates from the parked vehicles during rain would be impossible to collect and remove. Therefore, they would drain into the ground water. P279-02

3. The Chumash have stated the property is for housing only. Why would they need housing when they [the members] are all receiving in excess of $1000 per day. It is a perfect reason for another casino since they have previously obtained two gaming licenses. P279-03 P279-04

Thank you for your consideration.

Peter Van Iderstine

Broussard, Chad <chad.broussard@bia.gov>

FW: Opposition to Approval of the TCA

1 message

Amy Dutschke <amy.dutschke@bia.gov> Wed, Sep 25, 2013 at 12:57 PM
To: Chad Broussard <chad.broussard@bia.gov>, John Rydzik <john.rydzik@bia.gov>

Guess this goes to you guys.

From: Jay Richolson [mailto:jayricholson@icloud.com]
Sent: Wednesday, September 25, 2013 11:52 AM
To: amy.dutschke@bia.gov
Cc: dfarr@countyofsb.org; aaron.shapiro@mail.house.gov; devin_rhinerson@feinstein.senate.gov
Subject: Opposition to Approval of the TCA

Dear Amy Dutschke:

I'd like to formally record my opposition to the BIA approval of the TCA for these reasons:

- The BIA is wrong on the history of the tribe's relationship to this land
- The BIA is wrong on the law that is referenced to justify this TCA
- The BIA was negligent in failing to scrutinize the tribe's assertions
- The BIA approval was given improperly in violation of the National Environmental Policy Act (NEPA)
- The BIA failed to give proper notice to the County, local government agencies, and affected property owners

P280-01

Sincerely,

Jay Richolson

Jay Richolson

2896 San Marcos Avenue

P.O. Box 672

Los Olivos, CA 93441

Comment Letters P281 and P282

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P280.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Re: (EA) for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee to Trust Acquisition Project

1 message

Broussard, Chad <chad.broussard@bia.gov> Mon, Sep 30, 2013 at 8:20 AM
To: Anne Marie Balash <abalash@cappellonoel.com>

Ms. Balash,

I just left you a voicemail but figured I'd respond to your email as well. This is a received by deadline but you are welcome to send your comments in by email on that date. Comments in any readable form are accepted.

Chad A. Broussard
Environmental Protection Specialist
U.S. Department of Interior, Bureau of Indian Affairs, Pacific Region
Division of Environmental and Cultural Resources Management, and Safety
Office Phone: (916) 978-6165
Cell Phone: (916) 261-6160

On Thu, Sep 26, 2013 at 10:32 AM, Anne Marie Balash <abalash@cappellonoel.com> wrote:

Dear Mr. Broussard:

I am inquiring about the deadline and format for commenting on the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee to Trust Acquisition Project. The deadline is listed as October 7, 2013 for making public comments regarding the EA. Are the comments required to be received by the Bureau of Indian Affairs by or on the current deadline? Or, can the comments be mailed out by that date (October 7, 2013) with a proof of service? Can you please also advise if there is a required or preferred format for the public comments? P283-01

Thank you for your help in this matter.

Best regards,

Anne Marie Balash

Anne Marie Balash

Legal Secretary

Cappello & Noël LLP

Comment Letter P284

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Santa Ynez Band of Chumash Indians - Camp 4 property.

1 message

Charlotte Dodge <CDodge@peritusasset.com> Thu, Sep 26, 2013 at 10:45 AM
To: chad.broussard@bia.gov

Good morning Chad,

Thank you for your time in reading the attached letter. I strongly would hope that the Chumash tribe are able to incorporate their land – called Camp 4, into the Fee for Trust status so that their people may build homes, enjoying this beautiful country that was once completely theirs.

The work you've done is appreciated and I hope that my letter does not come across too strong, I dislike the anger that has been portrayed by many of the local town people and would hope that even though I disagree with them, I would never lower myself to acting as they do…anger is never an answer.

P284-01

Best,

Charlotte

Charlotte Dodge

HR Manager/Office Manager

Peritus Asset Management, LLC

25 W. Anapamu St., Floor 3

Santa Barbara, CA 93101

Ph: 805-679-5614 Fax: 805-882-1122

www.peritusasset.com

September 9, 2013

To Whom it May Concern,

As a member of the Santa Ynez community, I would highly encourage you to place Camp 4 into fee-to-trust land. I'm quite sure I'm not using the correct verbiage and apologize as this is not a matter to take lightly. Unfortunately my passion for this topic runs deep and I can not sit quietly any longer.

I've lived in this area for more than 30 years, and having done so have shared my life with many cattle farmers, shop owners and community members Native and non-Native Americans. Long before the movie "Sideways" came out and when the Casino was actually a Bingo Hall, I grew up working in the cache shops, always wondering what drew people to our beautiful valley. I suppose it's always been the truly magnificent countryside and quaint bed and breakfast specialty hotels and shops. It's a land untouched by time. Truly magical and special in it's own way. Magical in that I truly believe it's beauty holds many special healing powers. Many years later, as an adult, I've witnessed the local shop owners retiring with their children no longer wanting to carry on the traditions, leaving empty business spaces to be filled with wine-tasting rooms and specialty restaurants.

Still magical, the valley remains somewhat unchanged, even with the presence of a large Casino. This is because the Chumash have taken great steps to make the Casino blend in with the topography. Not only is the building beautifully concealed as it sits in the river-bed surrounded by fabulous gardens of trees and shrubbery, it's appealing in that the Chumash have kept the Spanish style feel throughout, featuring beautiful flowerbeds and fountains. Even the actual reservation is hidden from the public as the Chumash enjoy and are due their privacy. I believe this is how they intend to develop Camp 4 as well. I've seen the proposed design, with careful plans laid out to honor the tribal members in providing a beautiful environment to live in. And after viewing the plans and hearing the testimony, find myself asking "isn't this what we're hoping to accomplish?". These are a people who have had everything taken from them, a society that was once regarded as the elite members of a class of peaceful traders...the Catholic church once took everything away and soon after, the settlers came in and repeated the same criminal act! In fact, if I were to be honest, and I mean no disrespect, the 99 acres that were awarded to the Chumash people was, in my book, a bit of a slap in the face as it is NOT the nicest land in the valley. To have to have now purchased their land from a well known farmer (who we all love and respect), seems a bit strange as well. Now having to fight legal battles, spending a great deal of money fighting those people who oppose change, seems even more ridiculous. Especially when the funds used could go to setting up various programs for assistance in education.

P284-02

I suppose my bitterness for these people who oppose the development stems from the fact that they're the same people who oppose any growth other than for their own benefit. These same people are mostly ranchers who are grandfathered into tax relief programs ...yet they bring nothing to better the community themselves. They only look out for their own benefit...never giving to local children's

organization's or community groups. You would not believe the fight the town entered into when many wanted to build a recreation park for children. Thankfully a few large benefactors stepped forward and the project continued. The only people who give in this community are in fact the Chumash people – generously giving hundreds of thousands of dollars to many different organizations every year.

From everything I've witnessed from Chairman Vincent Armenta, I can tell you that they are a people who intend to keep our valley beautiful as they truly live through the beauty of the land, and not just on it.

I invite you to personally come out and visit our area, partake in a meeting and witness the greed that is put forth from the local farmers who oppose the development of Camp 4. Not to sound too harsh, but I believe that it would be a reenactment of times that should not be forgotten...a time where the white man dictated the rules...with little consideration to the Natives. I do not understand why this is still a debate and why we are wasting so much time and money on this battle.

P284-02
(Cont.)

Thank you for your time and consideration, I know you will make the right choice in granting the Chumash their desire to place Camp 4 into fee-for-trust status, as I cannot wait to see how they develop the land and in building new museums and education centers for all to enjoy! We all benefit from good!

Sincerely,

Charlotte Sizemore-Dodge

Broussard, Chad <chad.broussard@bia.gov>

FW: CHUMASH BAND OF INDIANS TRIBAL ANNEXATION & CONSOLIDATION ACT - MAJORITY OPPOSITION

1 message

Amy Dutschke <amy.dutschke@bia.gov> Thu, Sep 26, 2013 at 12:31 PM
To: John Rydzik <john.rydzik@bia.gov>, Chad Broussard <chad.broussard@bia.gov>

From: LGF msn [mailto:productionlogistics@msn.com]
Sent: Thursday, September 26, 2013 11:28 AM
To: amy.dutschke@bia.gov
Subject: CHUMASH BAND OF INDIANS TRIBAL ANNEXATION & CONSOLIDATION ACT - MAJORITY OPPOSITION

26 September 2013

Ms. Amy Dutschke, Regional Director

BUREAU OF INDIAN AFFAIRS – Pacific Regional Office

2800 Cottage Way

Sacramento, CA 95825

My family, neighbors, friends, business associates are vehemently opposed to the BIA's approval of the Chumash Band of Indians' TCA – in effect the Taking of County Assets.

- The Bureau is wrong on the history of the Tribe's relationship to this land
- The Bureau is wrong on the law that is referenced to justify this TCA
- The Bureau was and is negligent in failing to scrutinize the Tribes' multiple, non documented and erroneous assertions
- The Bureau approval was given improperly in violation of the National Environment Policy Act
- The Bureau failed to give notice to the County, local government agencies and hundreds affected private property owners – its actions have been by design wholly opaque and surreptitious

P285-01

Camp 4 land is presently in protective contract through the California Department of Food & Agriculture - resulting in the California Land Conservation Act, more popularly known as the Williamson Act and subsequent Super Williamson

P285-02

Act. By State law this land has protected the Public Trust from untold boom and bust developers. Beyond, this legal protection is put into automatic extension every 10 years. Over the past decade, the State of California has worked dutifully on behalf of its taxpaying citizenry to strengthen this law as countless real estate developers (including Fess Parker) and now the deep pocketed Santa Ynez Band of Chumash Indians exert tireless, voracious and unprecedented political and financial pressure upon local governments and their leaders to alter the law and transform it into Fee To Trust - making it not simply tax exempt from the public tax base but exempt from restriction of any kind. Under such no-holes barred Fee-To-Trust conditions:

P285-02 (Cont.)

- no building construct is too high
- no quantity of development too much
- no parking lot, hotel, golf course, bar, gambling casino or dance establishment too big
- no neon light too bright
- no cost too great
- no public plunder too extreme

P285-03

One need look no further than Foxwoods CT and the Mashantucket Pequot Indian Reservation to see such grossly disproportionate establishments. The Santa Ynez Band of Chumash Indians indeed espouse their desire to not simply consolidate the Santa Ynez Valley but annex 7000 square miles of "tribal" California land from Malibu to Morro Bay - though the 1934 Indian Reorganization Act requires them to have been recognized prior to this date. The Santa Ynez Band of Chumash were not recognized by the US Government until the mid-1970's.

P285-04

Unprotected, Camp 4's virgin 1400 acres would be subject to unrestricted development - transforming open wilderness into California's newest San Fernando Valley - an urban sprawl without limitation. Only such Developers' and Santa Ynez Band of Chumash Indians find this beneficial to the public good. What a travesty ... and in the fictitious name of good stewardship of native land.

By public voice and years of input the future development of Camp 4 has been unambiguously settled in the Santa Ynez Valley Community Plan, the one and ONLY official county government-sanctioned blueprint for development in the Santa Ynez Valley. It is the ONLY document which reflects the inputs, objectives and desires of all Santa Ynez Valley residents, businesses, government ... including Taxpayers.

P285-05

The Chumash Band of Indians are a private landowner as it relates to Camp 4. There is no tribal government status or element of sovereignty on this property. This so-called TCA and Fee-to-Trust Annexation of the Camp 4 property would create of major loss of local control and adverse economic and environmental impacts. Good governance relies upon local government and elected officials, adopted policy and comprehensive planning, to balance the needs of the community and plan for the future. The needs of the Many - outweigh the needs of the Few. Thousands of taxpayers and residents in the Santa Ynez Valley oppose the Camp 4 Annexation and Tribal Consolidation and Annexation Area including but not limited to every major land organization: Happy Canyon Home Owners, Meadowlark Home Owners Association, Rancho Estates Home Owners, Rancho Ynecita Home Owners, Neighborhood Defense League, Preservation of Los Olivos, Preservation of Santa Ynez, Santa Ynez Valley Alliance, Santa Ynez Valley Association of Realtors, Santa Ynez Valley Concerned Citizens and Women's Environmental Watch. This is NOT a small minority of vocal Santa Ynez residents as Mr. Armenta would have the public believe – this is the vast majority of taxpayers living and working in the Santa Ynez Valley. Furthermore:

P285-06

1. On page 2-3, the Chumash plan to provide their own waste water treatment plan. Camp 4 sits atop of the

P285-07

aquafer that supports a significant portion of Santa Barbara County. Who would represent the whole population that relies on that water in terms of oversight of the proposed Chumash waste water treatment? P285-07 (Cont.)

2. On page 2-4, the following representation is made: No gaming would occur on the subject property. The Chumash obtained 2 gaming permits....they have used only one to date. It would be negligent for your analysis of the EA to ignore the potential construction of a casino on Camp 4/TCA land. P285-08

3. On pages 2-6/7, the following is stated: The County, Solvang/Santa Ynez Sheriff Substation provides general public safety and law enforcement service for the project area. The Sheriff Substation is located in Solvang, approximately three miles from the project site. It provides 24-hour service to the Santa Ynez Valley and Solvang area.The County Fire Department (Fire Department) provides structural fire protection services to the project area. The Fire Department protects primarily residential areas, and responds to calls for structural fires as well as medical emergencies.
The Chumash have said they would be willing to pay $10 Million to compensate the County for the loss of tax revenue from Camp 4. The $10 Million in no way provides adequate compensation for the in perpetuity loss of tax revenues if the 1,400 acres is taken in Trust, let alone addresses the significant new demands the existing County law enforcement and fire services that would result from the proposed development of this now virtually undeveloped pristine land. P285-09

4. On page 2-7, the following is stated:To meet increased demands, the Tribe would develop an on-site water supply system using groundwater. There is no information as to how the potential increased demand, let alone the stated increased demand will impact all of the existing and future needs of all of the populations who are dependent upon the aquifer. P285-10

5. On page 2-8, the following is stated: Existing access roads would be improved and new roads constructed to provide access to the proposed residences and existing agricultural operations. The EA does not speak to the impact of the additional traffic that would result from the stated proposed development of Camp 4, let alone the potential development that is NOT addressed but reasonably anticipated to fulfill the economic opportunities the Chumash have stated will be provided to allow "the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises." (Page 1-7) P285-11

6. On page 2-10, the following is stated: "All identified wetland areas and California Live Oak would be avoided to the maximum extent feasible." The term "feasible" is subjective. Although not bound by State and local laws on Trust lands, the Chumash have voted on State and local measures on their ballots. State and local laws have been enacted specifically to protect wetland areas and California Live Oak for the enjoyment of OUR future generations. "We the people" - including the Chumash - have elevated the future value of these environmental protection objectives over all other potential uses of the land on which they are located. P285-12

7. On page 2-12, the following is stated: "The tribal facilities would include development of a banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, and a tribal community space including ceremony room and gymnasium....Approximately 400 parking spaces would be provided for the facilities."
Nowhere in the 930 page EA does the Tribe address the environmental impact, let alone the broader community impact, of the use of a facility on Camp 4 that necessitates 400 parking spaces. The proposed "community event facilities are stated to encompass nearly 80,000 square feet! (page 2-14). Santa Ynez Valley residents already are gravely concerned about and pursuing laws to regulate and restrict the number of special events that may be hosted at wineries and other privately owned facilities due to the traffic, light and sound pollution, and other negative impacts caused by these events. P285-13

8. On page 2-16 the following is stated: "Impacts to biological resources would be greater under Alternative A due to the size of the assignments. Under Alternative A, approximately 330.11 acres of critical habitat for a protected species would be removed from designation. Under Alternative B, approximately 65.28 acres of the critical habitat would be removed from designation. Both alternatives would adversely impact water of the U.S., special-status species, protected oak trees, and migratory birds without the implementation of mitigation."
The Chumash concede that their proposed developments for Camp 4 adversely impact biological resources, protected species, protected trees and migratory birds. It is your obligation to determine, as a matter of fact, that the proposed development of Camp 4 by the Chumash warrant these adverse consequences. P285-14

9. On page 2-16, the following is stated: "No adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative..."
This is a broad conclusion...not a statement of fact. Mr. Broussard, please fulfill your duty to exercise your own due diligence so that you may come to your own conclusions as to what adverse impacts would result from the pursuit of either Alternative A or Alternative B. Please review Alternative A and Alternative B against the background of the Santa Ynez Valley Community Plan. P285-15

10. On page 4-69, the following is stated: "A project that would induce disorderly growth (i.e., would conflict with P285-16

local land use plans) could indirectly cause adverse environmental or public service impacts."
The County has spoken to what is deemed to be "orderly growth". This statement is incorporated in the Santa Ynez Valley Community Plan. Neither Alternative A nor Alternative B are incorporated in the county's vision of orderly growth.

P285-16 (Cont.)

11. On the same page (4-69) the following is stated: "No significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B." Please exercise your own due diligence and do not merely adopt these conclusions. The term "significant" is highly subjective, and it is extremely significant to non-Chumash majority members of this community that any development of Camp 4 have minimal detrimental impacts on our use and enjoyment of our home.

P285-17

The community in its entirety relies upon tax revenues and impact fees to provide essential services and infrastructure and there presently exist a myriad of fiscal shortfalls. Unfunded tax subsidies and exemptions threaten the County's ability to further balance its budget and serve all its residents. Good governance demands that future development of the Camp 4 property be subject to County government elected for and by ALL the citizens of Santa Barbara County.

P285-18

Louis Friedman

Taxpayer, Santa Ynez, CA

Broussard, Chad <chad.broussard@bia.gov>

FW: Chumash TCA Proposal in Santa Ynez Valley, California

1 message

Amy Dutschke <amy.dutschke@bia.gov> Thu, Sep 26, 2013 at 4:15 PM
To: John Rydzik <john.rydzik@bia.gov>, Chad Broussard <chad.broussard@bia.gov>

From: Sandra Jankowski [mailto:sandyjrose@verizon.net]
Sent: Thursday, September 26, 2013 2:10 PM
To: amy.dutschke@bia.gov
Subject: Fwd: Chumash TCA Proposal in Santa Ynez Valley, California

Begin forwarded message:

From: Sandra Jankowski <sandyjrose@verizon.net>

Subject: Fwd: Chumash TCA Proposal in Santa Ynez Valley, California

Date: September 26, 2013 1:47:55 PM PDT

To: @bia.gov

Our Supervisor of the SB County that represents the Santa Ynez Valley gave me the address to send my letter in order to reach the BIA. This address does not work. please forward this e-mail , if you can find Amy Dutschke in your directory. Thank you, Sandra A. Jankowski

P286-01

Begin forwarded message:

From: Sandra Jankowski <sandyjrose@verizon.net>

Subject: Chumash TCA Proposal in Santa Ynez Valley, California

Date: September 26, 2013 11:09:45 AM PDT

To: amydutschke@bia.gov

Cc: dfarr@countyofsb.org, aaron.shapiro@mail.house.gov, devin_reinerson@feinstein.senate.gov

Bcc: Orly Segal <orlyssr@yahoo.com>

Sandra A. Jankowski

3210 Acampo Rd./P. O. Box 817

Los Olivos, California 93441

Amy Dutschke

Bureau of Indian Affairs

To: Amy Dutschke

I am writing to you today to let you know that I oppose the Camp 4 Annexation and the Tribal Consolidation & Annexation Areas in The Santa Ynez Valley of California.

There are numerous individuals and myself that oppose the approval of the TCA that has been filed with you by the Chumash Indian Tribe. The following reasons are why I oppose this TCA.

1) The BIA failed to give notice to the County of Santa Barbara, any local government and any of the affected homeowners. P286-02

2) The BIA approval of the Chumash's proposed TCA was given improperly in violation of the National Environmental Policy Act.

3) The BIA was negligent in failing to scrutinize the tribe's assertion

4 The BIA is not correct on the law that is referenced to justify this TCA.

5) The BIA is not correct on the history of the tribe's relationship to this land.

P286-02 (Cont.)

This action by the BIA is an egregious act in our civilized world. Times and circumstances have changed. The time for all the special treatment for the Indians is about over in my mind. The Chumash Indian tribe of the Santa Ynez Valley is very cash rich. The cash from our US Government needs to go to needy Americans, the Chumash Indians make enough money through their gaming that they do not need the handouts from the US Government on top of their gaming proceeds. The Chumash people's income far exceeds many residents of the Santa Ynez Valley resident's income.

P286-03

It is time The Chumash Tribe contribute to the community in which they live. They do not support the Santa Barbara County or the State of California with any tax payments. If and when they want to further expand their presence in the Santa Ynez Valley, they should follow the same rules that everyone else here in the valley have followed and go through the Santa Barbara County's Planning Commission.

P286-04

It is about time that our society does not allow the Indians to cry "wolf" over the injustices of the past that are over hundreds of years old. If the BIA is supposed to be a viable part of the US Federal Government, perhaps it would be time to start acting more civilized in your land acquisitions.

P286-05

Proudly American,

Sandra A. Jankowski

Broussard, Chad <chad.broussard@bia.gov>

Fwd: comments on EA fro Camp 4 annexation

1 message

LINDA KASTNER <lkast6945@aol.com> Fri, Sep 27, 2013 at 9:48 AM
To: chad.broussard@bia.gov
Cc: myriam.veldez@sen.ca.gov

Please forgive the misspelling and misdirected previous emails .

. Please accept these comments on the EA fro the annexation of land in the Santa Ynez Valley by the Santa Ynez Band of Mission Indians
Thank you

Linda Kastner
see below

-----Original Message-----
From: LINDA KASTNER <lkast6945@aol.com>
To: chad.brousard <chad.brousard@bia.gov>
Cc: supervisorcarbajal <supervisorcarbajal@sbbos1.org>; jwolf <jwolf@sbcbos2.org>; dfarr <dfarr@countyofsb.org>; peter.adam <peter.adam@countyofsb.org>; steve.lavagnino <steve.lavagnino@countyofsb.org>; myriam.valdez <myriam.valdez@sen.gov>; assemblymember.williams <assemblymember.williams@assembly.ca.gov>
Sent: Fri, Sep 27, 2013 9:41 am
Subject: comments on EA fro Camp 4 annexation

Dear Mr, Broussard,

Thank you for the opportunity to attempt to read, in its entirety, the EA for the annexation of 1400 acres in the Santa Ynez Valley by the Santa Ynez Band of Mission Indians (Chumash) by extending the comment period .

To my surprise I see a Tribal land consolidation and acquisition plan that encompasses aprox 10,000 more acres than the annexation request of 1400 acres that is Camp 4 included in this EA. There was no notice or discussion of such an action to any County Government or public notice of such an action. This action puts annexation requests at a lesser scrutiny than off reservation annexation requests. This now makes Camp 4, by approval of this TCA, contiguous to the Santa Ynez Band of Mission Indians reservation that is two miles away. I strongly protest this action.

The EA addresses traffic and states that existing roads would be improved and new roads be constructed to provide access.(page 2-8) The existing roads are two in number and are narrow two lane roads. The County roads that would have to be used are narrow and limited in sight .The County has posted signs to that effect on Baseline Avenue.

There is no mention as to how traffic would be handled by the suggested banquet and exhibition hall with 400 parking spaces.page (2-12). With parking spaces for 400 cars,that could easily be one thousand people at each 100 events mentioned.. With 143 homes built that could easily be 300 more cars to add to these already sub standard roads. Who would bear the cost of improving

P287-01

P287-02

P287-03

these County roads and who would bear the cost of maintaining these roads?
A more complete traffic study must be made to ensure that roads maintained by the County of Santa Barbara are to code and can handle this increased load.

P287-03 (Cont.)

Water would be provided by developing an on site system using ground water. I see no mention of how this increase in demand for water would affect the surrounding population. Wells are on land in the TCA which provide water to inhabitants of the Valley. Where is it addressed how, if land were purchased and annexed, these water systems would continue.

P287-04

These are but a few items I see that show this entire document is flawed and needs an entire EIA.

P287-05

Thank you ,
Linda Kastner

Linda Kastner
6945 Happy Canyon
Santa Ynez Ca 93460

CC:
Amy Detschke certified mail

Governer Jerry Brown certified mail

U.S Representative Lois Capps certified mail

U.S. Senator Barbara Boxer certified mail

U.S. Senator Dianne Feinstein certified mail

Comment Letter P288

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a forwarded email of Comment Letter P268.

Broussard, Chad <chad.broussard@bia.gov>

Letter of comment on Chumash EA

1 message

Andi Culbertson <mac@aculbertsonlaw.com> Fri, Sep 27, 2013 at 2:27 PM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Hello Chad – I know that the instructions for commenting require mailed comments, and I am mailing mine today, but I thought you would appreciate an electronic copy. Please let me know if you have questions. P289-01

M. Andriette Culbertson

(805) 688-5327

(805) 688-5357 (fax)

mac@aculbertsonlaw.com

Final EA letter.pdf
2966K

C. David and M. Andriette Culbertson

September 27, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

SUBJECT: Comments on Environmental Assessment, Santa Ynez Band of Chumash Indians, Camp 4 Fee-to-Trust

Dear Ms. Dutschke:

I am writing to present my comments on the above captioned Environmental Assessment (EA). P289-01 Cont.

The purpose of the Environmental Assessment (EA)

The purposes of an EA are to:

1. Provide evidence and analysis sufficient to determine whether an EIS is required;
2. Aid a federal agency's compliance with NEPA when no EIS is required; and
3. Facilitate preparation of an EIS when one is necessary. (40 C.F.R. 1508.9 (a)).

An EIS is required if the proposed federal action has the potential to significantly affect the quality of the human environment, including direct, indirect and cumulative effects. Federal agencies are directed by the Council on Environmental Quality (CEQ) NEPA regulations to the degree of public controversy over those effects in determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). P289-02

The EA presented for the Camp 4 Fee-Trust (FTT) application has fulfilled virtually none of these requirements, and nonetheless concludes that no significant effects will flow from the approval of the FTT application. In reaching this conclusion, the EA relies upon an incomplete and contradictory project description, incomplete studies, spurious conclusions and a complete failure to address cumulative impacts. The EA must be withdrawn and re-drafted in a manner adequate under the CEQ NEPA regulations, and the conclusion should be that an EIS is required.

Project Description

It is beyond legitimate argument that an adequate project description is the *sine qua non* of an adequate EA analysis. If the Project Description does not adequately describe the project and its setting, no adequate analysis can flow from it. P289-03

Yet, not only is the Project Description inadequate here, it is inaccurate in several respects. At the very least, it is inconsistent with the stated position of the Bureau of Indian Affairs (BIA) in its notice of the FTT application dated September 17, 2013[1].

Because the project and its setting are not adequately defined, the studies similarly fall well short of describing the direct, indirect and cumulative impacts of the project. This flaw persists throughout the document. It is not incumbent upon members of the public to painstakingly point out each and every manifestation of this flaw, and where the flaw results in shortcomings in the document. Plainly stated, the absence of true analysis is in part because of the absence of facts about the project description.

P289-03 Cont.

No one wants unnecessary EIS documents. But at the same time, the duty of the BIA under NEPA is to inform. No adequate information can be generated when the project description is so opaque and incomplete. In this case, an EIS is what is needed in order to take a hard look at the environmental consequences. Any other approach is arbitrary and capricious.

P289-04

The following shortcomings are but a handful of such problems with the EA that should be heavily weighed by the BIA before proceeding. Since the BIA is vested with a responsibility under NEPA to take a "hard look" at the environmental consequences before proceeding, these issues must be dealt with.

Comment 1: The standard of review for the Fee to Trust (FTT) application is inconsistent with the FTT notice and the verbal responses of the BIA personnel.

The Introduction section, Part 1.2, contains a fatal flaw. At p. 1-5, the following statement is made:

"According to the land acquisition policy defined in 25 CFR 151.3(a)(1), land may be acquired in trust status for a tribe when the property is located within a Tribal Consolidation Area and given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation."

This statement is also made, although somewhat more furtively, in the Application for FTT itself, in that the application is justified only on the basis of Section 151.10 standards, On-Reservation FTT, even though this property lies more than 3 miles from the current reservation and is clearly not contiguous. Moreover, in a conversation with Carmen Facio, Acting Regional Director (according to the notice itself), she emphasized that "the lawyers set the standard for review" and that "it was unlikely that [the lawyers] would determine that this FTT would be judged by 151.10 alone"[2]. Finally, the Facio notice itself states that the application will be judged by Code of Federal Regulations, Title 25, INDIANS, and Parts 151.10 and 151.11. It is clear that no consensus on this standard of review was reached prior to issuing the EA for review. Far from a simple consultant error, the EA represents the independent judgment of the BIA. The more lenient standards of Part 151.10 standing alone could very well explain the shortcomings in the EA itself. For this reason alone the EA should be re-drafted and re-issued for public review.

P289-05

[1] Notice of application seeking acceptance of title to real property "in trust" by United States of America, Carmen Facio, Acting Regional Director, September 17, 2013

[2] Personal communication, Andi Culbertson

Comment 2: The existing application is for housing *and* economic development, yet applies the less rigorous standard of review for applications that are solely for housing.

At p. 1-5, the EA states that there is "...an operating horse stable..." on the Camp 4 property. Contact with the County Planning Department indicates that there is no such record. There is no operating horse stable on the property. This is important, because the standards of review for FTT applications have rigorous requirements – unless the application is just for tribal housing. The project as described clearly admits this is not the case (a commercial stable and approximately 44 acres of additional commercial vineyards are proposed) but at the very least the mention creates an internal conflict in the document. Is there a stable there now? Will the new stable be established in its place? No details are presented.

P289-06

Comment 3: The Tribe's justification for the FTT based on a need for tribal housing is unsubstantiated, not legitimately analyzed in the EA in terms of the full effect and meaningful use of the existing reservation are for redevelopment is summarily dismissed.

At p. 1-6, the EA states that the proposed trust land would enable the Tribe to provide housing for its existing tribal members and continue to provide housing for descendants as they come of age. It argues that the current Reservation lands are highly constrained due to a variety of physical, social, and economic factors and that majority of the lands held in Trust for Santa Ynez are located in a flood plain. The EA goes on to claim, upon the basis of no evidence whatsoever, that the reservation land is not suitable for much, if any, development because of flooding and drainage problems.

As reported in the EA, the current reservation has a residential capability of approximately 26 acres or 18% of the Reservation and an economic development capability of approximately 16 acres or 11% of the Reservation. Somehow, the EA calculates that the usable part of the Reservation amounts to approximately 50 acres, much of which has already been developed.

P289-07

First, 50 acres is a more than adequate area to redevelop for 143 homes (the EA never explains why 143 homesites represent a "magic number" when there are only 136 members of the tribe, and a claimed 1300 descendants). At 143 homesites, 50 acres would yield approximately 143 15,000+ square foot sites, much in keeping with homes in the town of Santa Ynez, right across the street. In my example, I am presenting statistics for single family detached lots, but greater economies could be realized by a multi-family component being added as well.

But none of the arithmetic explains why the Tribe has a population of 136 tribal members and approximately 1300 lineal descendants but is planning and building for 143 homesites. There is no analysis of the prospective future development and, with 1300 claimed descendants, the development to accommodate all of them would be far beyond 143 homes. The arrangements of the various alternatives do not even suggest where this development might take place.

Simply stated, there is absolutely no nexus between the plans shown (143 homes, stable, vineyards) and the goals stated housing for 136 tribal members and 1300 lineal descendants), and therefore there must be another plan producing cumulative impacts which are not assessed. The

EA must be revised and recirculated with a stable and finite project description in order for the BIA and the public to responsibly determine the scope of impact.

P289-07 Cont.

Comment 4: **The EA does not include the more rigorous evaluation required for non-housing uses proposed by the Tribe.**

At p. 1-7, the EA clearly contemplates the pursuit of economic activity justifying closer inspection under the regulations of the BIA Handbook:

"Secondarily, the trust acquisition of the proposed trust land would also allow full tribal governance over its existing agricultural operations on the property; thereby allowing the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises."

P289-08

Since tribal housing only is excused for the more rigorous requirements of the FTT analytical process, and this is clearly not a proposal involving only tribal housing, the BIA is obligated to report out the results of the more rigorous analysis in the EA.

Comment 5: The Tribe can meet its goals by seeking entitlements through the County of Santa Barbara and does not need to take the land Fee-to-Trust in order to meet the stated goals.

At p. 2-1, the following statement appears in the EA:

"For the Proposed Action (Alternative A), the only reasonable alternatives are to either take no action or take the requested parcels located within the Tribe's Tribal Consolidation Area into trust on behalf of the Tribe to alleviate the existing shortage of developable land and associated housing on the Tribe's Reservation."

These are not the only reasonable alternatives. The Tribe can seek entitlements through the County of Santa Barbara, including an amendment to the Santa Ynez Community Plan. The Tribe bought the land knowing full well the limitations of the Community Plan, but that is not to say another plan could not be considered. The EA should discuss what would be necessary to amend the Community Plan, and how they would mitigate for the impacts. This is feasible, and is even the way the Tribe approaches some of their land acquisitions now, both in Solvang and Santa Ynez, as well as elsewhere. Evidence a quote from the Tribe's representative last year with regard to land in the 645-acre Santa Susanna Field Laboratory (SSFL) that the Tribe has indicated it wants to purchase:

P289-09

"Fee title protects the site, and putting the land in trust doesn't give us any additional protections." . . . . "Putting the land into trust gets us even more opposition than taking the fee ownership. It raises this casino issue and gets everyone upset." Ventura County Star, 10.15.2012

Clearly, if the Tribe's goals can be met at the SSFL property without FTT, they can be met here.

At p. 2-3, the EA states that Alternative C would represent "No federal action or proposed development." These are two separate ideas and should be treated as such. No federal action is one Alternative. This would be the abandonment or denial of the FTT application. As stated by Carl Artman, in a 2008 Memorandum to the Regional Directors of the BIA, not every parcel of land acquired by a tribe is entitled to be taken into trust, and a demonstrated need must be shown. Artman further states:

> "It should be noted that that tribes are free to pursue a wide variety of off-reservation business enterprises and initiatives **without the approval or supervision of the Department.**" [Emphasis added]

P289-10

The fact that no federal action would occur does not, as the EA states, preclude development of the property. The EA should have considered the alternatives of development under the existing County Santa Ynez Community Plan and via an amendment to the Santa Ynez Community Plan. Both of these alternatives are feasible, especially when only 17% of the tribal membership lives on the current reservation. There is no showing that tribal members who live off-reservation in the community (many do) would sell their fee simple interests in their homes and move to the Camp 4 property. In fact, given the small number of tribal members that live on the current reservation, it is likely that a redevelopment alternative is feasible.

Comment 6: The EA conducts a very superficial analysis of cultural resources, which for off reservation FTT are one of the factors weighed in determining whether there is a historical connection to the property which is the subject of the FTT.

I have stated previously that, given the shortcomings and flaws in the project description and also the alternatives, the analytical portions of the EA are necessarily inadequate because their impact evaluations are not based on a true picture of the scope of the project. Nonetheless, at least one area of the EA conducts such a superficial analysis that it really comes to no conclusion at all. This particular section was prominent to me because of the tribe's claims of cultural resources on site.

At p. 3-48, the following statement is made:

P289-11

"A total of 16 *potential* cultural resources were discovered during the intensive field survey. There were *no temporally diagnostic artifacts* observed during discovery and recording of any of the resources." [Emphasis added]

Amazingly, no attempt was made to further explore whether any of the *potential* artifacts was actually a *true* artifact, or something else. No excavation was done, and the entire analysis consisted of a records and literature search revealing no recorded sites, and a walkover in transects approximately 50 feet apart. This is completely inadequate, and surprising, since the Tribe claims a historic relationship with this land and one would suppose they would be more curious about the contents.

On the very next page, p. 3-49, we learn for the first time that they actually found "sites" – still shown as "potential":

"The results of the 2011 Archaeological Investigation and Supplemental Study documented the discovery of 16 *potential* cultural resources. These include 4 archaeological sites, 9 isolated artifacts, and 3 historic stock troughs. None of these resources appear to be accompanied by especially complex archaeological deposits."

In order for the Tribe to claim, as they do, a historic and modern connection to the land, more analysis is needed. The EA is completely deficient in this analysis, which is central to understanding whether the project has any effect on resources at all. The cavalier approach of this superficial study falls far beneath these standards.

P289-11 Cont.

This is just one of the many areas where the EA conducts an exceedingly superficial analysis of a very incomplete project description and falls well short of the "hard look" required by NEPA.

Comment 7: <u>The EA failed to analyze the cumulative impacts associated with potential development on the 11,500 acres within the BIA-approved Tribal Consolidation and Acquisition Area.</u>

Finally, the EA utterly fails to address the cumulative and growth inducing impacts of the project, particularly with regard to the more lenient standards it claims for FTT applications within a Tribal Consolidation Area. The public is left completely in the dark as to the potential implications – the "domino" effect – of the acquisition and FTT treatment of 11,500 acres. Of course, the public would have known the implications of the TCA had the BIA conducted a NEPA process for that decision, which it clearly did not. Since such analysis was not conducted at the time of TCA approval, it must be conducted here.

P289-12

<u>Conclusion</u>

The reason that the National Environmental Policy Act exists is to regulate the decisions of federal agencies in a way that forces them to understand the consequences of actions that they are considering. When a NEPA document such as an EA falls so far short of the requirements of the law, it not only does not inform, it <u>misleads</u>. Since the BIA is also the agency which makes the decision on the FTT through a Consortium paid for by the applicant, rigorous scrutiny is demanded to assure the State, the County and the public that the process is not *pro forma*.

The direct, indirect and cumulative effects of this FTT, and the need for an EIS, are self-evident. It is essential to the integrity of the NEPA process for the BIA to abandon this EA and pursue the preparation and completion of an EIS prior to making a decision on this FTT application.

P289-13

Sincerely,

M. Andriette Culbertson

M. Andriette Culbertson

Comment Letter P290

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash Camp 4 and TCA plans

1 message

Kendall Mills <kendallmills@me.com> Sun, Sep 29, 2013 at 2:03 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

To Chad Broussard, I have lived in Janin Acres near the SYV High School for over 41 years, and I love living here. P290-01
I am strongly opposed to the Chumash efforts to take Camp 4 from fee to trust. I am also strongly opposed to the P290-02
TCA plan to annex 11,500 acres east of Refugio Road in our Valley. I'm very worried about the future use of the aquifer under Camp 4. Thank you, Ken Mills P290-03

Comment Letter P291

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P290.

Comment Letter P292

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter P287.

Comment Letter P293

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P207.

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Environmental Assessment

1 message

Chris Mills <m5r@mac.com> Tue, Oct 1, 2013 at 9:28 AM
To: chad.broussard@bia.gov

Dear Mr. Broussard,
I'm writing to express my deep concern about the annexation of the Camp 4 property and the tribes TCA Plan. The 1,400 acre Camp 4 property sits atop an aquifer that is critical to the survival of the Santa Ynez Valley. It could have catastrophic consequences if the County of Santa Barbara were to loose regulatory authority of this land and aquifer. There are too many questions being left unanswered in regards to the potential harm to the aquifer.The Chumash tribe will not be required to follow any planning and development guidelines and will not adhere to the Santa Ynez Valley Community Plan. The tribe has conceded that their planned development will have an adverse environmental impact on biological resources, protected species & protected trees.
Please help us maintain county control of this highly valuable property.
Thank you.
-Chris Mills

P294-01

P294-02

P294-03

Comment Letter P295

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P273.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

FW: Chumash Tribal Consolidation Map

1 message

Amy Dutschke <amy.dutschke@bia.gov> Wed, Oct 2, 2013 at 8:27 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>
Cc: Lorrae Russell <lorrae.russell@bia.gov>

FYI

—Original Message—
From: Bruce McBroom [mailto:mcbroom1@earthlink.net]
Sent: Tuesday, October 01, 2013 6:34 PM
To: amy.dutschke@bia.gov
Subject: FW: Chumash Tribal Consolidation Map

October 1, 2013

Ms. Amy Dutschke. Regional Director,Bureau of Indian Affairs

We are long time residents and property owners in the village of Ballard, about 3 miles from the edge of the TCA map you recently approved. P296-01

Your Bureau gave no public notice of this, nor any provision to comment. We believe that your actions are improper and violate the provisions of the National Environmental Policy Act.

We also question your authority and precedent in making your decision,as well as your interpretation of the History of the Chumash in this area. P296-02

You appear to have accepted all of the Tribe's assertions without investigating or contacting interest parties.

You have now allowed only 30 days for comment from us as well as our County and State agencies. This is unfair and capricious in our opinion. P296-03

Respectfully,

Bruce & Kathie McBroom
2505 School St.
Ballard, CA 93463
805 455-1490

—— End of Forwarded Message

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

FW: Santa Ynez Valley Chumash TCA issue

1 message

Amy Dutschke <amy.dutschke@bia.gov> Wed, Oct 2, 2013 at 8:28 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>
Cc: Lorrae Russell <lorrae.russell@bia.gov>

From: Rebecca Flynn [mailto:rebkyf@msn.com]
Sent: Tuesday, October 01, 2013 5:27 PM
To: amy.dutschke@bia.gov; Devin_Rhinerson@feinstein.senate.gov
Subject: FW: Santa Ynez Valley Chumash TCA issue

From: rebkyf@msn.com
To: amydutschke@bia.gov; aaron.shapiro@mail.house.gov; devin_reinerson@feinstein.senate.gov; dfarr@countyofsb.org
Subject: Santa Ynez Valley Chumash TCA issue
Date: Tue, 1 Oct 2013 22:41:02 +0000

Hello Ms. Dutschke.

As a property owner in the TCA area of the Santa Ynez Valley I would like to convey my intense disappointment in the Bureau of Indian Affairs in regards to their hasty decision to approve the TCA of the Chumash Tribe here in the Santa Ynez Valley.

There are many reasons why this is SOOOO wrong as I'm sure you have been made aware of in the past few weeks, i.e. the failure to notify ANYONE involved, the history errors, the environmental issues, on and on..... But mainly I just cannot believe that the BIA would take this seriously! This involves almost the entire township of Santa Ynez. Do you really think this is the right thing to do, taking ALL of this land off of the County of SB's tax roll, destroying hundreds of people's homes and businesses? It may be different if this were a poor tribe who really needed the land, but as I'm sure you are aware this tribe is VERY wealthy.

P297-01

I beg you to do the right thing and retract this approval. It is completely without merit and has already caused a lot of trouble here in our hometown and many hard feelings towards the tribe. We need to live in harmony and there is no reason why we cannot, if everyone is reasonable. The TCA is NOT a reasonable option.

Thank you,

Rebecca Flynn

Broussard, Chad <chad.broussard@bia.gov>

FW: Opposition to Chumash TCA in Santa Ynez CA

1 message

Amy Dutschke <amy.dutschke@bia.gov> Wed, Oct 2, 2013 at 8:29 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>
Cc: Lorrae Russell <lorrae.russell@bia.gov>

—Original Message—
From: Donn Crummer [mailto:donncrummer@hughes.net]
Sent: Tuesday, October 01, 2013 4:32 PM
To: amy.dutschke@bia.gov
Subject: Fwd: Opposition to Chumash TCA in Santa Ynez CA

>
>
> Dear Amy Dutschke, Bureau of Indian Affairs,
>
> Is it any wonder people have less and less trust and confidence in their government and representatives when one is made aware of your recent approval of the Chumash Tribal Consolidation and Acquisition area (TCA), an unprecedented 'taking' of 11,500 acres from Santa Barbara county. I am shocked and incensed that my property and home of 30 years, along with hundreds of my neighbors', and even the beautiful town of SantaYnez could be secretly redesignated as part of this TCA for the benefit of our wealthy Chumash tribe! Where is transparency and due process???
>
> I am strongly opposed to this unprecedented and controversial Tribal Consolidation and Acquisition (TCA) approval and it needs to be repealed for several reasons, just a few of which are: the BIA failed to give ANY notice to any affected property owners, or to the county or any local government agencies; the BIA was negligent in failing to scrutinize the tribes inaccurate assertions, not the least of which is their inaccurate historical claim to this property; the BIA approval was improper as it is in violation of the National Environmental Policy Act.

P298-01

>
> This small group of Chumash Tribal members benefiting from the casino, hotel, restaurants, etc. on their sovereign reservation are already the wealthiest group in the valley, and this is evidenced by their recent burgeoning political influence. I certainly hope this does not explain how such an egregious and secretive approval could occur.
>
> Our public servants need to be reminded that they should serve with honesty and integrity and that they serve at the behest of 'we the people', and not just for the benefit of a powerful or politically-correct group. All people, including the Chumash, have the same rights and restrictions to develop their private property as they see fit, but under the auspices of the county regulations and taxing authority. On all property outside the established reservation, we should

P298-02

all live by the same rules, no more no less.
>
> This is a big deal...and will not be limited to those directly affected in this valley but soon throughout the county and state if this process and precedent is allowed to stand. The BIA, or powers that be, need to revisit this outrageous and undemocratic process and immediately and unequivocally repeal this recent TCA approval.
>
> Sincerely,
> Donn Crummer, Santa Ynez
>

P298-02 (Cont.)

P298-03

BIA ON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

FW: Chumash Tribe Tribal Consoldiation Area in Santa Ynez California

1 message

Amy Dutschke <amy.dutschke@bia.gov> Wed, Oct 2, 2013 at 8:31 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>
Cc: Lorrae Russell <lorrae.russell@bia.gov>

—Original Message—
From: Rob Walton [mailto:rob.walton.consulting@gmail.com]
Sent: Tuesday, October 01, 2013 12:48 PM
To: amy.dutschke@bia.gov
Cc: dfarr@countyofsb.org; aaron.shapiro@mail.house.gov; devin_rhinerson@feinstein.senate.gov
Subject: Chumash Tribe Tribal Consoldiation Area in Santa Ynez California

Hello Ms. Dutschke:

I am a property owner and resident in the area abutting the current Chumash Reservation, and in the area the BIA plans on designating as a tribal consolidation area (TCA).

As property owners my wife and I protest any designation of lands as fast-track eligible for becoming part of a reservation expansion. This property and the nearby parcels are NOT part of the tribe's land, and we object to any such designation.

Not the least, there was no public process for this designation. TCA does have a very real impact on the value of land within, since parcels purchased by the Chumash will in the future be able to become reservation land without any sort of land use restrictions such as normally required. Did you even seek any outside information as to the effect a TCA designation might have on the properties owned within that area? P299-01

We have, I repeat, we have absolutely zero concern about living next to Native Americans. In fact, the location of the Chumash being nearby was an interesting and positive issue when we bought our home.

But by the BIA creating a TCA, without the tribe actually owning the majority of land within, this is causing a negative effect on our home values because if moved fee-to-trust and part of the reservation there are no constraints on water table usage, no building or development review processes required.

If not already, you will be experiencing law suits against yourself and at the BIA for such a spurious and thoughtless act, one which has not involved the effected community and property owners AT ALL prior to the BIA's designation.

That the BIA has involvement in Indian Affairs is just fine, but it should be limited to lands that are actually owned by the tribe, not lands that they would LIKE to own. P299-02

In summary,

> the BIA is wrong on the history of the tribe's relationship to this
> land the BIA is wrong on the law that is referenced to justify this
> TCA the BIA was negligent in failing to scrutinize the tribe's
> assertions the BIA approval was given improperly in violation of the
> National Environmental Policy Act (NEPA) the BIA failed to give notice
> to the County, local government agencies, affected

It is shameful that the BIA, as a representative of the Obama administration, would take such ill thought out actions, listening ONLY to the request of the Chumash, and not even informing effected parties in advance.

We ask that you reverse the TCA designation and begin a public process if that is what the Chumash are requesting.

P299-03

You and your organization have in one step done more to reverse the largely positive impression of native americans and the services that provide for them.

P299-04

Make this right and reverse your course, please.

P299-05

Sincerely,

Rob Walton

Rob Walton, RN, MPA
305 White Oak Road
Santa Ynez, CA 93460
Voice: 805-722-0693
email: rob.walton.consulting@gmail.com

Rob Walton, RN, MPA
Health Care Consultant
Voice: 805-722-0693
email: rob.walton.consulting@gmail.com

Broussard, Chad <chad.broussard@bia.gov>

Oppositon to Chumash Tribe TCA and Camp 4

1 message

Kurt Alldredge <thechefstouch@earthlink.net> Wed, Oct 2, 2013 at 12:33 PM
To: chad.broussard@bia.gov
Cc: amydutschke@bia.gov, dfarr@countyofsb.org, aaron.shapiro@mail.house.gov, devin_reinerson@feinstein.senate.gov

Mr. Chad Roussard

Environmental Protection Specialist

Bureau of Indian Affairs, Department of the Interior

Dear Mr. Roussard,

As a concerned, long time citizen of Santa Ynez and current home owner within the Chumash Tribes outlined Tribal Consolidation and Acquisition Act. I am asking you to further consider the BIA's decision to grant approval of the tribes proposed TCA plans. This decision fails to take into account the community at large as well as the environmental impact of such a plan. The effects of the current casino on the community and land have been devastating with significant increases in traffic, crime, noise, light pollution and air pollution. P300-01 P300-02

The tribe's plans for the Camp 4 property and the TCA are vague and subjective with no real concrete answers to such matters as drinking water, waste water disposal, environmental impact to the land, animals and migratory birds, infrastructure impact and the cost of additional police and fire support.

The impact to the community would be devastating and not in line with the current community development plan. If the tribe is allowed to proceed with their plans for both the Camp 4 project and the TCA it will forever destroy the bucolic, natural beauty of the valley and has pitted neighbor against neighbor. P300-03

For the BIA to approve such a plan without notifying current land, home and business owners is to deny our legal rights and not within the realm of administrative process. Furthermore the BIA's decision fails to take into account the National Environmental Policy Act and the overall environmental impact of such a plan. For the BIA's regional director to disregard these matters is unacceptable and probably unlawful. P300-04

The tribe's current and past actions have proven them to be a neighbor that is not going to take good care of the lands that they occupy. And for them to assert that they need the additional lands for housing is manipulative. Many of the houses currently on the reservation are not occupied and many of the "Enrolled" money receiving members do not live on the reservation. For Mr. Armenta to assert that they need to provide additional housing for their members is without support. P-300-05 P300-06

I implore you to reconsider the BIA's approval of the Tribal Consolidation Plan and the fee-to-trust of the Camp 4 project until all of the residents of the Santa Ynez Valley have their opportunity to be heard. P300-07

Sincerely,

Kurt R. Alldredge

3563 Tivola St.

Santa Ynez, CA. 93460

805-686-1040

Comment Letter P301

Broussard, Chad <chad.broussard@bia.gov>

comments on EA for Camp 4 annexation Santa Ynez CA

1 message

hiddenlakeranch@earthlink.net <hiddenlakeranch@earthlink.net> Thu, Oct 3, 2013 at 12:43 PM
Reply-To: hiddenlakeranch@earthlink.net
To: chad.broussard@bia.gov

Dear Mr. Broudsard,

My Husband and I live in Santa Ynez Rancho Estates and our home borders the east side of the 1,400 acres know as camp 4. We have recently found out that our property is also in a Tribal land Consolidation and Acquisition plan and so are the water wells that supply all of SY Rancho Estates. P301-01

The TCA was approved without any notice or discussion to any County Government or private homeowners whose properties will be negatively impacted by this decision. P301-02

The EA for the annexation of the 1400 acres camp 4 only addresses the 1,400 acres that is camp 4. What about the other 10,000 acres? There must be a complete Environmental Impact Statement done on all of the property involved including the TCA.

The project is inconsistent with and contrary to the Santa Ynez Valley Community Plan. The plan will negatively impact the environment and place an unreasonable burden on local infrastructure and the surrounding homes and community. P301-03

The water wells for Rancho Estates are located in the TCA. There was no study done on how the developing of camp 4 on site systems using ground water would affect the ground water and exciting wells in the area. P301-04 P301-05

Camp 4 is bordered on the north and south by narrow county roads that do not have paved shoulders and limited in sight. The impact of construction of the 143 homes, suggested banquet and exhibition hall with 400 parking spaces and the related traffic requires further study. P301-06

If this is allowed to go forward as is, it will change the Santa Ynez Valley forever. Please an Environmental Impact Statement is warranted. P301-07

Thank you,
Caryn and Tom Cantella
1551 Linda Vista Dr.
Santa Ynez, CA 93460

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash TCA in Santa Ynez, CA and associated plan

message

kenneth day <kenpday@gmail.com> Thu, Oct 3, 2013 at 5:18 PM
To: chad.broussard@bia.gov

Mr. Broussard,

My specific comments below reflect one central concern. To date the Chumash plan has not addressed fundamental existing protections that our community depends on to protect our environment and govern development. P302-01

Currently water rights for over 20 ground water basins are in adjudication by the California State Superior Court. One of these, the Santa Maria Basin, is in our Central Coast area. I ask you to consider that the Chumash plan states that they would develop an on-site water supply using groundwater. Since the Chumash plan provides no explanation of how this would impact the underlying aquifer, the plan is deficient. BIA approval of the current Chumash plan would circumvent long-standing county planning requirements for oversight of our precious water resources. The Chumash plan would amount to a blank check to drain the aquifer without any level of government oversight. This is especially important during the current prolonged drought that has affected the entire Central Coast. P302-02

My specific thoughts in the above paragraph extend to a wider issue. There is an underlying tone throughout the Chumash plan that weakly masks the entire issue of county oversight. Approval of the current plan would create two classes of citizens, those who must comply with County oversight and those who do not. The Chumash have consistently said that they want to be part of our overall community; but the current plan places them in a special privileges category. Another example is access roads that would not have to comply with County guidelines. P302-03 P302-04

I will forward my concerns to our elected Federal and State representatives at all levels. P302-05

Kenneth P. Day
714 Hillside Drive, Solvang, CA

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Chumash reservation and Camp4 annexation

message

William Otto <bovinebill@hotmail.com> Thu, Oct 3, 2013 at 10:34 PM
To: Chad <chad.broussard@bia.gov>

Dear Mr Broussard,

I am a fairly recent resident of the Santa Ynez valley but in a short time we have come to love the valley and the rural quality of life here. I am very concerned about the potential adverse environmental and community effects of the annexation of Camp 4 to the Chumash reservation. I don't blame them for wanting to accomplish this goal, however it is inappropriate for this property and this community. The environmental effects can be monumental especially if this land is annexed to the reservation. At that point there would be absolutely no controls on what is done with the land vs leaving it as property owned by the tribe and developed under the guidelines of normal channels with the county of Santa Barbara. P303-01

Even though their proposals may not seem so much to an outsider, they will result in huge changes to the surrounding area with traffic, light pollution, loss of large numbers of CA oak trees, wetlands, and a huge increase in water consumption. And that is if they actually follow their proposals. Of course human nature tells us that they will not. The proposed need for a waste water plant suggests tremendous use of water and sewage production. They propose 100 events a year! with 400 parking spaces and how many more will be added once there are no controls put on their development plans. To think that there will be minimal environmental impacts is naive and to think that they will not add additional gaming facilities and commercial endeavors beyond their current proposals is also naive. When asked if they would put the bulk of the Camp 4 into a land trust since they say they will not develop it anyway, they responded with an absolute NO WAY. Further development would be an environmental disaster.....coming from someone who is not a rabid environmentalist. P303-02 P303-03 P303-04

Our water acquifers are already in trouble and any significant additional use will present problems for the rest of the Santa Ynez valley residents well into the future. Land use rules are in place for a reason: to prevent large scale degradation of the environment and the quality of life for all in the valley (including the chumash). P303-05

The current environmental report is clearly inadequate and clearly flawed and needs to be revisited. The fee to trust of Camp 4 must be stopped. The Chumash can and should develop the property only under the guidelines and restrictions that exist currently in the County of Santa Barbara. P303-06

Thank you for your consideration.

Sincerely,

William J Otto
380 Meadowlark Rd
Santa Ynez, CA 93460

Broussard, Chad <chad.broussard@bia.gov>

FW:

1 message

Amy Dutschke <amy.dutschke@bia.gov> Fri, Oct 4, 2013 at 9:10 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>

FYI, we have already granted a 15 day extension to Santa Barbara County.

—Original Message—
From: DAVID CROSBY [mailto:croz43@me.com]
Sent: Friday, October 04, 2013 1:18 AM
To: amy.dutschke@bia.gov
Subject:

>> RE: Notice of (Non-Gaming Land Acquisition Application Extension
>>
>> Dear Regional Director Dutschke,
>>
>> As a resident of Santa Ynez Valley I request that you grand the 60-day extension asked for by the Count of Santa Barbara for further review.
>> This application was granted by you on June 17. The county did not receive the request until September 23, 2013.
>>
>> We do not believe this is a sufficient review period for what would be a tremendous impact of the Santa Ynez Valley, landowners and questions of water rights to name just a few.
>>
>> Thank You, David Crosby

P304-01

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Opposition to Camp 4 Annexation Application and TCA

1 message

Jeanne Glover <jeanne.glover@gmail.com> Fri, Oct 4, 2013 at 10:27 AM
To: chad.broussard@bia.gov

Dear Mr. Broussard,

My name is Jeanne Glover and I have been a resident of the Santa Ynez Valley for over 25 years. My physical address is: 1401 Edison St.; Santa Ynez, CA 93460. My mailing address is: P.O. Box 1612; Santa Ynez, CA 93460. P305-01

I am writing this email to add my name to what I know is a lengthy list of opponents to the annexation of Camp 4, including the TCA by the Chumash tribe.

Aside from being personally affected by the resulting depreciation value of my home which is within the TCA, my opposition to this annexation is because of the severe environmental effects it will have on our Valley. P305-02 The tribe says they will develop an on-site water supply system using groundwater. P305-03 There is no information on just how this will affect the needs of all of the populations who are dependent upon the aquifer.

In addition, the protection of identified wetland areas and California Live Oak is at risk. The Chumash claim they will protect them to the "maximum extent feasible" – just what does that mean? And if this area goes into trust, just how will this "protection" be monitored? P305-04

The unprecedented increased traffic resulting from the proposed development of Camp 4 poses increased risks and dangers. P305-05

To say that "no significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B" is preposterous. P305-06 There is nothing advantageous about anything of this for residents of the Santa Ynez Valley. P305-07 Our environment – including our water, roads and protected wildlife will be destroyed and the very reasons that we grew to love this Valley will be gone. P305-08

Respectfully submitted,
Jeanne Glover

Comment Letter P306

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is nearly identical to that of Comment Letter P280.

Comment Letter P307

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is nearly identical to that of Comment Letter P327, with the exception of a missing footer.

Broussard, Chad <chad.broussard@bia.gov>

Stand Up For California's Comment on the Chumash Camp 4 EA

Inbox

Cheryl Schmit <cherylschmit@att.net> Fri, Oct 4, 2013 at 10:59 AM
To: chad.broussard@bia.gov
Cc: "Rydzik, John" <john.rydzik@bia.gov>, Arvada Wolfin <Arvada.Wolfin@bia.gov>

October 4, 2013

Dear Mr. Broussard,

Please find attached Stand Up For California's letter of comment on the proposed fee to trust at Camp 4 by the Chumash Mission Indians of Santa Ynez.

P308-01

Stand Up For California has sent a hard copy to Regional Director Amy Dutschke via priority mail with a signature request. In light of the Partial Government Shut Down, I am forwarding this letter to your office via email as a secondary measure.

Sincerely,

Cheryl Schmit, Director

Stand Up For California

916 663 3207

www.standupca.org

cherylschmit@att.net

Oct. 1, 2013 Stand Up ltr of Comment on Camp 4 EA.pdf
8441K

Stand Up For California!
"Citizens making a difference"

www.standupca.org

P. O. Box 355
Penryn, CA. 95663

October 1, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825

RE: Comment on Environmental Assessment (EA) of Proposed Trust Acquisition of Five Parcels known as the Camp 4 Property

Dear Regional Director Dutschke,

The following comments are submitted on behalf of *Stand Up For California*. First, thank you for your willingness to extend the comment deadline to October 7, 2013, in response to the County of Santa Barbara's letter requesting an extension. Clearly the size and scope of this proposed fee to trust acquisition combined with California's first ever approved Tribal Consolidation Area is significant and warranted an extension.

Stand Up For California reserves the right to submit additional comments on the proposed trust acquisition. In part, one of two of the Freedom of Information requests we have made to the Pacific Regional Office, Bureau of Indian Affairs (BIA) was returned with a partial denial. *Stand Up For California* has filed an Appeal. We are still awaiting documents on the second Freedom of Information Act request. Since the proposed Trust Acquisition is within the Tribal Consolidation Area (TCA), a full and fair evaluation of the EA is dependent on the responses of both the FOIA requests and FOIA Appeal.

P308-01 Cont.

Stand Up For California submits the following comments regarding: (1) Section M – Tribal Consolidation Plan, (2) purpose and need of the tribe for this fee to trust acquisition, (3) the deficiency of the alternatives listed and omitted, (4) its impact on the Santa Ynez Valley, (5) unaddressed impacts and (6) conclusion.

P308-02

Discussion

I. Section M – Tribal Consolidation Plan (TCA)

Section M of the EA includes the Tribal Consolidation Plan. This Plan was approved June 17, 2013 by the Pacific Regional Office of the BIA without notice to the private property owners or affected local governments. ***The TCA administratively creates what amounts to a claim of aboriginal lands or restored lands for the Tribe. Therefore, in order to appropriately evaluate the Fee to Trust Acquisition we must evaluate the TCA.***

P308-03

While there is no statutory or regulatory criteria upon which to develop a TCA based on the acquisition of new lands, there is specific regulatory authority to acquire land that is outside of a reservation boundary. The Chumash reservation is approximately 1.6 miles from the Camp 4 property. *These parcels do not share a boundary with the established reservation land and therefore must be reviewed under 151.11 an Off Reservation Acquisition.*

The EA appears to request the land as retribution to be ***"banked"*** [1] for use for future generations. The Tribe identifies the need for this retribution as the failure of the federal government to grant title to their claim on lands in 1851. The Tribe further asserts it was the intent of the Catholic Church and Mexican and or Spanish Government to give these lands to the Tribe. The very presents of this language in the EA and the TCA appears intended to sidetrack decision makers from the merits of the fee to trust transaction before them.

The TCA is currently being challenged by the County of Santa Barbara, Concerned Citizens of Santa Ynez, Meadowlark Ranches Association and the Santa Ynez Valley Association of Realtors before the Interior Board of Indian Affairs (IBIA). Therefore, for the purposes of preserving the arguments made in the Statement of Reasons by the County of the Santa Barbara, Concerned Citizens of Santa Ynez, Meadowlark Ranches Association and the Santa Ynez Valley Association of Realtors, ***Stand Up For California "adopts and incorporates" the Statement of Reasons for Appeal in the June 17, 2013 Decision by Pacific Regional Director to approve Land Consolidation and Acquisition Plan of the Santa Ynez Band of Chumash Indians submitted by all parties to the IBIA.***

P308-03
Cont.

The "concept" of the TCA is based solely on an IBIA ruling, *Absentee Shawnee Tribe v. Anadarko Area Director*, Bureau of Indian Affairs, 18 IBIA 156 (02/20/1990). This ruling has no statutory or regulatory law to support its conclusion. Administrative Judge Vogt in the *Absentee Shawnee Tribe v. Anadarko Area Director* reversed and remanded the prior negative decisions stating:

> "The Board finds that, *in the absence of statutory or regulatory criteria*, appellee had the discretionary authority to analyze appellant's plan under *reasonable criteria of his own devising*. Appellee's initial analysis which took into account *such factors as the geographic extent of proposed consolidation area vis-a-vis the tribes need for additional* und, and the BIA's ability to provide services to the land, appears to be *reasonably related to the ultimate development of a realistic and manageable land for the trust acquisition of additional land for the tribe." (Emphasis added)*

This ruling without statutory or regulatory criteria permits this *specific* Regional Director in this *specific* instance to create reasonable criteria of his/her own devising. Judge Vogt suggests the following are reasonable criteria:

(a) The extent of the geographic area,
(b) Ultimate plans for development of a trust land, and
(c) The tribes need for additional lands.

However, it is extremely questionable if Regional Director Amy Dutschke used or considered the suggestions of Judge Vogt, in devising her own *"reasonable criteria"*. It appears, Regional Director Dutschke provides no criteria for her approval at all! Let's consider the approved TCA under Judge Vogt's suggested criteria:

[1] ***"Land banking"*** is the acquisition of land by tribes for some future undisclosed use. This action circumvents the intent of federal regulations intended to address serious and critical taxation and jurisdictional issues.

(a) Extent of geographic area – suggested by Judge Vogt

The approved TCA encompasses approximately 11,500 ac of private property that has been under the control of the State of California and the County of Santa Barbara for 163 years. It has been in the private ownership of individual citizens for as many years. The Chumash Mission Indians of Santa Ynez (Tribe/Chumash) are asserting a claim of aboriginal lands through an administrative process. The history provided by the tribe in the proposed TCA Plan evidently was not verified or questioned. While the Tribe mentions the 1851 Act, the Tribe fails to provide the evidence submitted to the Commission for validation of their Spanish or Mexican Claim on the land. In the end, whatever evidence was submitted to the 1851 Commission was insufficient as the claim of title was rejected.

The assertion that the Spanish or the Mexican Government were intending to give the Mission lands back to the Indians raises many questions. History is clear that the actions of the Spanish and Mexican Governments were as Imperialistic nations assimilating populations on newly conquered lands.[2] When Spain or Mexico created colonies they did not recognize the existing governance but rather assimilated the populations under their authority, jurisdiction and governance. Recognition of Chumash Governance did not come till many years later under the superintendence of the United States government.

The Chumash fail to inform decision makers that the 1851 Act eliminated adverse claims on all California Titles. Even the adverse claims of Indians or quasi sovereigns were rejected making clear *there are no aboriginal land claims in California.* As a matter of federal law, it seems a very difficult task for the Pacific Regional Director to create reasonable and lawful criteria to develop a TCA *anywhere* in California. To do so, and take land into trust under the current guidelines established in this EA wrapped up in the TCA creates *irreparable harm*, clearly a standard that is ripe for a Temporary Restraining Order or Injunction.

P308-03 Cont.

To refresh the memory of decision makers, the Mexican War concluded in 1848. Mexico ceded to the United States what is now the southwestern United States, including all of the present day State of California. (Treaty of Peace, Friendship, Limits and Settlement, U.S. –Mex., May 30, 1948, 9 Stat. 922, T, T.S. No. 207 (1850). There is a general belief in Indian Country that the Mexican government betrayed Indians by not including their lands to be set aside for tribes in this treaty.

Shortly thereafter, Congress enacted a statue to settle land claims in the newly acquired territory. (Act of March 3, 1851, ch.41,9 Stat. 631). The 1851 Act created a Board of Commissioners to determine the validity of all claims, and it required every person including Indians "*claiming lands in California by virtue of any right to title derived from the Spanish or Mexican government*" to present the claim within two years. Any land not claimed within two years, and any land for which a claim was finally rejected was to be deemed "part of the public domain of the United States." (1851 Act 13, 9 Stat. at 633. *See - United States v. California*, 436 U.S. 32, 34 n.3 (1978). The Chumash and the BIA have missed the deadline for a land claim by 160 years. ***Development of the TCA is an abuse of the Regional Directors authority. The decision is arbitrary and capricious and based on erroneous facts.***

[2] The Spanish missions in California comprise a series of religious and military outposts established by Spanish Catholics of the Franciscan Order between 1769 and 1833 to spread the Christian faith among the local Native Americans. The missions represented the first major effort by Europeans to colonize the Pacific Coast region, and gave Spain a valuable toehold in the frontier land. The settlers introduced European livestock, fruits, vegetables, cattle, horses and ranching into the California region; however, the Spanish colonization of California also brought with it serious negative consequences to the Native American populations with whom the missionaries came in contact. The government of Mexico shut down the missions in the 1830s. In the end, the mission had mixed results in its objective to convert, educate, and "civilize" the indigenous population and transforming the natives into Spanish colonial citizens.

(b) Ultimate plans for development of a trust land suggested by Judge Vogt

The Tribe has only stated that they will build 143 homes, supporting utilities and maintain the existing grape orchard. There is significant acreage, more than half of the remaining 1433 acres for which ***"no ultimate plans"*** are describe. Instead, the Tribe has stated they are land banking for future needs of the Tribe. The concept of land banking for future undetermined needs was not foreseen in 1934 at the enactment of the Indian Reorganization Act.

While the Chumash have stated that this is a non-gaming application, there is strong likelihood that the intended use of the land will change. In fact, there is significant information that the Tribe wants to use the land for something other than 143 homes. In 2003, the Chumash proposed housing and "a casino/hotel complex development" on this same land.[3] It would appear now, the Tribe is attempting to piece-meal the *ultimate development plans* for this property. Further, there is no statement in the draft Cooperative Agreement offered by the Chumash to promise not to construct a casino/hotel or other commercial development on this property. ***The EA and TCA together send a strong message that the tribe wants to get the land safely in trust and change the intended use at some future date.***

While the concerns of the local government and the surrounding community of citizens may be considered speculative, the BIA must recall the recent actions of the Tule River Indian Tribe of Tulare County. The Tule River Indian Tribe and the BIA asserted the concerns expressed by local government and community members about future casino development were speculative. In 2011, the Tule River Indian Tribe submitted an application for 40 acres off reservation in the City of Porterville. The Tribe stated it was a non-gaming application. As evidenced in the County and State brief before the IBIA, the Tribe's intent was to use the land for gaming. As a result, the Tule River Indian Tribe withdrew its application. This is just the most recent example of a *bait and switch* transaction.

P308-03 Cont.

(c) The tribes need for additional lands suggested by Judge Vogt

In the *Absentee Shawnee Tribe v. Anadarko Area Director* the Tribe presented factors of high tribal unemployment rate, low educational level, substandard housing, low standard of living and high disease rate and its own inability to generate additional income from existing tribal lands to assist its people' economic development. The *purpose and need* of the Absentee Shawnee Tribe was to gain additional lands in order to increase the tribal land base and gain access to new economic markets within Oklahoma.

The Chumash *"Purpose and Need"* as stated in the EA, pales in comparison to that reviewed before Judge Vogt. The Chumash state, "the purpose and need is for Consolidation and Acquisition Plan by providing housing within the Tribal Consolidation Area to accommodate the Tribe's current members and anticipated growth". In the Chumash Application, the Tribe further states it wants the land in trust in order to remove the authority and jurisdiction of the County and the State.

The Chumash are truly a Tribe that tells a 'rag to riches' story. A story that became a reality due to the business oriented leadership of the Tribal Council and the Tribe's good fortune to be located in the Santa Ynez Valley. The Tribe's casino market area is free of competition from Los Angeles to Fresno County. A monthly stipend to members has been reported to be as high as $500,000.00 per enrolled tribal member per year. The enrolled

[3] The Tribe's 1999 tribal state compact in section 4.2 provides for two casinos

members (approximately 136)[4] have the means to purchase substantial housing anywhere in the United States or abroad. Tribal members have the ability to provide for private schools and advanced college educations for their children and future generations without tribal government assistance.

The Chumash exemplify the intended success of California's Proposition 1A passed in 2000 to provide a monopoly on casino style gaming that would generate revenue for tribal governments and raise the standard of living for all tribal members. The Tribe has purchased a number of other properties in the Santa Ynez Area and is a successful business model.

The Chumash have been and continue to be exceedingly influential in the State political system. The modern Chumash Tribe is not a victim of governmental policy nor is the voice of the Tribe discounted in local, state or federal policy actions.

II. Purpose and Need

The proposed trust acquisition encompasses 1,433 acres located east of Route 154 and north of Armour Ranch Road within a (TCA) in an unincorporated area of Santa Barbara County. Section 2.1 of the EA specially states that there is no other land comparable for a fee to trust acquisition within the TCA. Moreover, lands outside of the TCA would not meet the purpose and needs of the proposed action that is within the TCA. The stated *need and purpose* of this land acquisition is that lands outside of the TCA would constitute an Off Reservation acquisition. Using the federal regulations for Off Reservation acquisition creates a higher standard of review and provides for greater weight in the decision process to affected government. It would appear the Chumash *purpose and need* is to circumvent greater scrutiny of the fee to trust acquisition.[5]

The Tribe and the BIA are asserting that lands within the TCA approved on June 17, 2013, are to be considered an *On Reservation* acquisition. The Chumash reservation is approximately 1.6 miles from the Camp 4 property. These parcels do not share a boundary with the established reservation land and therefore must be reviewed under 151.11. *There is no statutory or regulatory law that supports this is to be an On Reservation Acquisition.*

P308-03 Cont.

III. Deficiency of Alternatives

The EA states it has been prepared, "...to comply with the National Environmental Policy Act, 40 USC §4332, and further defined in 40 CFR §§ 1510.10-218." Specifically, the EA does not include a reasonable range of project alternatives, it does not provide an adequate level of analysis of potential effects the proposed action may have on the physical or human environment, and it fails to consider the indirect and cumulative impacts of the Tribe's proposed action. As such, the EA does not provide the Tribe/BIA an adequate assessment of the potential effects that may result from the construction and operation of the proposed project.

P308-04

- The EA fails to state the *"ultimate total development"* of the land.
- The EA fails to consider land outside of the TCA as that would be considered an off reservation acquisition. The EA states the Tribe has an approved Tribal Consolidation Area over approximately 11,500 acres within the TCA, yet the project site is the only site where the proposed project (and only the proposed project) will satisfy the objectives of the Tribe. *The EA does not include sufficient evidence to support this conclusion.*

P308-05

[4] Tribal Application at page 9 of 16

[5] The Chumash have been members of the California Fee to Trust Consortium whose goal since 1998 has been to streamline the fee to trust process. In this instance, does "streamline" mean to circumvent a more stringent regulatory process that is required?

- The EA does not address the concerns that the project is contrary to the current zoning and general plan of the community. The recent ruling by the United States Supreme Court in Patchak, made clear that the Indian Reorganization Act is a *land use statute*. P308-06

- The EA does not address the full impact of the proposed action to the Agricultural Preserve of the Santa Ynez Valley. P308-07

IV After Acquired Lands and Impacts on Santa Ynez Valley

The Tribe further states that this is a non-gaming application. I disagree. This application must be considered and processed as gaming because the land is identified as within the recently approved TCA which determines that the land must be processed as an On Reservation transaction. The Tribes 1999 Tribal State Compact permits this tribe to have *two* casinos. The "California Fee to Trust Consortium" (Consortium) of which the Tribe is a member since its inception repeatedly fails to recognize gaming applications and process them accordingly. P308-08

The development of the TCA and the proposed fee to trust affects landowners *within and without* the boundaries of the TCA. The Tribe in its purchase of the 1,433 acres through the open market has regained control over the development of these parcels, however transferring this land from fee to trust grants the tribe governmental control over these lands. This creates a disruptive and practical consequence to the surrounding areas which are populated by non-Indians. Transferring these lands into trust creates a mix of state and tribal jurisdictions which burden the administration of state and local government and adversely affect landowners neighboring the tribal lands. Land will be removed from the tax rolls significantly affecting the future economics of the area. P308-09

This acquisition is a major federal action. Moreover, because the land has the potential to meet an exception under Section 20 of IGRA, *Stand Up For California* repeats, this proposed transaction requires a full Environmental Impact Statement (EIS). P308-10

V. Unaddressed Impacts

One of the Purposes of the National Environmental Policy Act (NEPA) is to provide a full and fair review of all adverse environmental impacts as well as listing all affected stakeholders. The EA submitted for the Camp 4 fee to trust acquisition does not meet this standard. The size and scope of the proposed fee to trust acquisition of 1433 acres raises substantial questions suggesting that project may have a significant environmental effect.

- These impacts must be judged against their local and regional context (40 CFR Sec. 1508.27 (a)) and an EIS prepared if either the impacts or the project itself is likely to be highly controversial. This proposed fee to trust has hit the pages of the Los Angeles Times beginning in 2005. It has been the topic of numerous news stories in state and nationally as well as many letters to the editor of local papers. It has been the subject of oversight hearings by the House Resources Sub-committee on American Indian and Alaskan Native Affairs. This is a controversial proposal.

- The proposed project does not describe the full use of the 1433 acres of land. An EIS is similarly required where the extent of impacts is "highly uncertain or involves unique or unknown risks." 40 CFR sec. 1508.27 (b)(5).

P308-10 Cont.

- The BIA must initiate a full EIS.

Ground Water:
Water throughout California is a scarce resource that must be properly managed. The EA discusses the Tribes use, but not a management plan that encompasses the off trust lands community. The acquisition of the 1433 ac. means a loss of local control of the aquifer to the entire valley. Major decisions regarding water usage will no longer be made by local people with locally-valued decision about the impacts and use. The water use projected by the 5-acre homes is 50-100% less than that actually used by the contiguous 5-acre neighborhood.

P308-11

Local water companies do not necessarily own the land that infrastructure (wells, reservoirs, pumping stations, etc.) is located on. "Easements and or leased land" supports the use of these properties for infrastructure. It is not clear if the encumbrances (easements, agreements, and leases) will survive if the 1,433 acres are taken into trust. Local water companies and the many private residences to which they provide service may potentially lose their water source. (*See* – Comment on Easements)

Easements:
The Secretary of the Interior must ensure and stipulate in any final decision that easements remain enforce on the trust parcels. Regional Directory Dutschke must require the elimination of all liens, encumbrances or infirmities prior to taking final approval action on this fee to trust acquisition. Transferring this land into trust without directly contacting easement owners represents a ***"taking or inverse condemnation"*** without due process or just compensation. Additionally, loss of access to private properties would devalue and make them unmarketable.

P308-12

Biological Resources:
While the EA provides general information and maps regarding biological resources it fails to analyze how the project impacts the surrounding regional area. A complete analysis of the potential biological impacts of the project is fully dependent upon an adequate and thorough survey and the significance of the potential impacts cannot be determined until surveys of impacts to the surrounding area are complete.

P308-13

Air Emissions:
Appendix B – provides rows and columns of numbers but this section fails to identify how this project conforms to Regional Air Quality Strategy for Santa Barbara County. Analysis to demonstrate conformance must be included.

P308-14

Cumulative Impacts:
The cumulative impacts analysis should include off-Reservation projects. The EA must consider the cumulative impacts on traffic and groundwater resources, and a thorough analysis must include all projects that contribute.

P308-15

Drainage and Water Quality:
The EA must include an inventory of the possible contaminants that may be generated on-site during the construction and operation of the proposed uses; and the direct and cumulative impact to existing water

P308-16

quality in the region. The EA must also provide information on how the proposed action will affect the beneficial uses of the region's water supply.

P308-16 Cont.

Transportation and Circulation:

Appendix I – The EA collected existing traffic volumes in March of 2012 for the roadway segments and intersections. The EA does not address the increase tourism traffic that exists during the summer months. The traffic *analysis* as in all reports by AES, is insufficient.

P308-17

Chumash Proposed Cooperative Agreement (CA): Enforceable Agreement between the Tribe and County of Santa Barbara:

The Chumash have offered a Cooperative Agreement (CA) to the County of Santa Barbara for 10 years. The proposed CA will pay one million dollars per year limited to10 years in exchange for the County to support their fee to trust project. However, the 1,433 acres if and when transferred into trust will be taken off of the tax rolls into perpetuity. The CA does not include any additional impacts to the County after year 10.

The proposed CA does not address necessary mitigations or services paid for at the expense of all County taxpayers. The CA does not offer mitigation funds for increased needs of services for law enforcement, fire or emergency services, nor does it offer in lieu of taxes for the property or for improvements to the property. Rather, the CA submitted to the County promises *"NO NEW REVENUES"*.

The payment in lieu of taxes in section III that is left blank comes to the tribe from federal and state sources, including the current Indian Gaming Special Distribution Fund (SDF). The California Court has ruled that SDF funds may only be used for gaming related impacts. Is this term in the CA *evidence* that the Tribe intends to use the 1,433 ac. of land for gaming in the future after it is safely in trust? The current SDF funds are inadequate to reimburse county tax payers for the costs of law enforcement, fire and emergency services generated by the Chumash casino development. How could these funds even be considered to offset future impacts?

P308-18

The CA does not offer monitoring of shared groundwater aquifers, establish threshold of water level declines or ensure that significant declines in groundwater levels do not extend off of the trust lands. It does not offer cooperation or mitigation measures that include a reduction or cessation in on site pumping until water levels in the monitoring wells rise above the thresholds. The CA does not offer an environmental assessment should future developments or land use changes occur. ***Terms such as these are critical in any agreement when land is taken out of the regulatory authority of the state and local government.***

The CA while providing a "Waiver" (Section 12) to the terms of the agreement fails to include the necessary language for a judicially bullet proof waiver. The CA describes but does not provide access to a fair and transparent solution for resolution to disputes in California District Court in Santa Barbara. The "Waiver language contained in this document" is nothing more than an unenforceable promise.[6] This CA may be a good

[6] Federal Indian law drastically affects and changes any contractual agreement. Tribal Governments must pass a resolution to bind it to a contractual agreement. Further when a tribe waives its sovereignty certain criteria must appear in the resolution to ensure it is in effect and operational; (1) The Resolution must agree to address matters arising under the terms of the contract in order to judicially waive the Tribes immunity to civil liability. (2) The Resolution must be adopted in a manner consistent with the Tribes Constitution. If the Tribe Constitution does not address waivers of immunity and some do not, then it will require a vote of the entire tribal membership, in order to waive the tribes immunity to civil liability. (3) The Resolution must identify who is to sign the agreement or authorize the entire Council to sign the Agreement and (4) If the Contract exceeds seven years and limits a tribal government's authority over the use of the land or impairs the title to the land, it then requires a review under USC Section 81 by the Secretary of the Interior. This may require the signature of the Secretary of the Interior. (25 CFR Part 81)

beginning for a negotiation, but commitment and execution is far from complete. ***The CA may require the signature of the Secretary of the Interior in accordance with Part 81.***

Any CA negotiated between a Tribe and a County outside of a tribal state compact requires the County to comply with the California Quality Environmental Act. The County cannot sign an agreement which contains provisions legally binding it to several definite courses of action that involve physical changes to the environment. The County will be required to perform a full EIS in order to enter into a CA with the Tribe. The terms and conditions of such an agreement must be voted on in an open public forum and subject to legal challenge. ***The Tribe must remember these issues are multi-jurisdictional and not just tribal.***

P308-18 Cont.

VI. Conclusion

Stand Up For California suggests that the BIA immediately require a full EIS to be prepared for recirculation and review of this proposed fee to trust acquisition under the proper regulation of CFR 151.11, Off Reservation Acquisition. Further, we strongly suggest the BIA and the Tribe withdraw the TCA.

P308-19

P308-20

Sincerely,

Cheryl Schmit, Director
916 663 3207
cherylschmit@att.net
www.standupca.org

Comment Letter P309

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is nearly identical to that of Comment Letter P207.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

environmental impact of land transfer in Santa Ynez Valley

1 message

carol white <cwcpsa@gmail.com> Fri, Oct 4, 2013 at 3:53 PM
To: chad.broussard@bia.gov

Dear Mr. Chad Broussard,

As a U.S. citizen, a native Californian, a descendant of a U.S. Indian tribe and a voting resident residing in the City of Solvang in the Santa Ynez Valley I am greatly concerned about the environmental impact of the Santa Ynez Chumash Tribe's T.C.A. plan and Camp 4 fee to trust application and related plans. P310-01

I am concerned about many of the environmental impact issues including the disparity created by loss of tax revenues and other financial revenues combined with an increase in demand for services and resources and also the impact on the ecology but I wish to highlight just a couple of my other concerns. P310-02

I am particularly concerned about water issues, both contamination and overuse. Most people do not understand the fragile nature of water systems particularly in arid climates such as exist here in the S.Y. Valley. If camp 4 goes into trust we lose control over usage and contamination of the aquifer that Camp 4 sits on top of and that provides water for a significant part of this county. The sharing of this water is a crucial issue. Very recently we have seen wells going dry in Paso Robles and problems in South San Luis Obispo County as well. Some say the water table has descended seventy to one hundred feet there in the last ten years, thirty feet in just the last year alone. They are trying to work out their significant water problems in SLO County but it is a difficult problem even when the parties are governed by the same court system and laws. To work out such problems with a separate, sovereign nation could be insurmountable and cause serious problems for everyone concerned. The Santa Ynez River presents an additional, perhaps even bigger problem. The TCA area map appears to include significant portions of this river. The "water wars" over this water source are already underway in our valley and it is a very significant and complicated issue requiring true expert evaluation and just and fair resolution. Water is our most precious resource and far too important to have ignored when approving the transfer of this land! P310-03

In regard to the Environmental Assessment portion of the annexing application the statement on page 2-4 that "no gaming would occur on the subject property" is irrelevant since we all know that if this land goes into trust the tribe can essentially do whatever it wants whenever it wants. One good look at the present "pinched" location of their casino and then at the subject property informs our common sense that it is in fact a very likely location for a much bigger operation of gaming and all the other businesses attached to the gaming activities and all of this in addition to the planned housing and other large activities and development. The need for water and all other resources to support this would be huge. P310-04

I am also concerned about the inadequacy of current roads in the region to withstand further development. These roads were built for rural traffic patterns and as a result of already increased traffic (a significant part due to the large number of visitors to the present casino) we not only have impacted traffic but more importantly the original design of these roads can not offer an adequate level of safety even at this time. The cost to change open access highways to limited access with on-ramps, etc. would be in the hundreds of millions if not billions. Yet tribal lands would contribute nothing to this. We already have unusually high accident and death rates particularly on highway 154 and the approaches to 154. Highway 154 traverses through the TCA property adjacent to the Camp 4 property. P310-05

I am greatly concerned for the eight hundred privately owned parcels as well as businesses inside the proposed TCA of which the greatest majority, by far are owned by U.S. citizens and has never been part of any reservation. The lack of consideration for thousands of people who have invested their lives and livelihoods in this location, many for generations, and the thousands more surrounding the TCA seems extremely short sighted. And all of P310-06

Comment Letter P310 (Cont.)

this at a time when many of them are still trying to recover from this past, and for many current recession. In an effort to correct historically past "wrongs" the Bureau of Indian Affairs is in fact doing the exact same "wrong" to these current residents and businesses . Two wrongs do not make a right. This current "wrong" becomes even more egregious when one considers that many of this small number of individuals who belong to this tribe receive monthly stipends equal to an average of what most families receive for the whole year. This is not about poverty on a reservation.

Please consider all environmental impacts, some of them monumental, before you acquiesce to such a questionable, large transfer of land from U.S. jurisdiction to a very different sovereign jurisdiction.

P310-06 Cont.

Thank You,

L. C. Smith
P.O. Box 1126, Solvang, CA 93464

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Comments on the EA for the Santa Ynez Band of Chumash Indians (Tribe)

1 message

Anne Marie Balash <abalash@cappellonoel.com> Fri, Oct 4, 2013 at 5:20 PM
To: "Broussard, Chad" <chad.broussard@bia.gov>
Cc: Wendy Welkom <wwelkom@cappellonoel.com>, Pamela Brinks <pbrinks@cappellonoel.com>

Dear Mr. Broussard:

Attached per your previous direction, please find the following: Comments on the Environmental Assessment for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee-to-Trust Acquisition Project on behalf of Ms. Nancy Crawford-Hall (including its Exhibit A, and Proof of Service). This document, as indicated on the Proof of Service, was also mailed to Ms. Dutschke on this date.

Best regards,

Anne Marie Balash

Anne Marie Balash

Legal Secretary

Cappello & Noël LLP

Phone: 805-564-2444

Fax: 805-965-5950

Email: abalash@cappellonoel.com

Comments on EA Camp 4 Fee-to-Trust.pdf
703K

CAPPELLO
& NOËL LLP
TRIAL LAWYERS

A. BARRY CAPPELLO

October 4, 2013

File No. 11012.001
225369.1

Via U.S. Mail

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Comments on the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee-to-Trust Acquisition Project

Dear Ms. Dutschke:

The following comments on the above-cited Environmental Assessment (EA) are submitted on behalf of Ms. Nancy Crawford-Hall. Ms. Crawford-Hall acts in various capacities to hold, manage, and operate real property in the Santa Ynez Valley, including property located directly across the street from Camp 4, and within the boundary of the Tribal Consolidation Area (TCA) approved by you on June 17, 2013. Both the Fee-to-Trust Application (FTT) and the instant EA which supports it are based on the TCA approval. (See, EA, §§ 1.2, 1.3, and Appendix M.) P311-01 P311-02

As an initial matter, an EA must: (1) provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (IES) or a finding of no significant impact (FONSI); (2) aid an agency's compliance with NEPA when no EIS is necessary; and (3) facilitate preparation of an EIS when one is necessary. It also must include, *inter alia*, a discussion of the need for the proposal, the alternatives, and the environmental impacts of the proposed action and alternatives. (40 C.F.R. § 1508.9.) P311-03

The instant EA fails to meet the above requirements. As a result, it does not provide a reasoned basis on which the BIA may proceed. The overriding problems, outlined in more detail below, are generally twofold. First, because the EA is predicated and relies on the TCA approval, it cannot ground any determination until the TCA appeal process is complete. P311-04

Second, or alternatively, because the EA reveals the need for additional and substantive analysis and evidence, it supports only one conclusion: an EIS must be prepared. The EA does not adequately define the project, let alone explain the need for the (undefined) project, the environmental impacts, or any reasonably foreseeable future impacts. This project is not the simple construction of a set number of residences. It is a major project which removes at least 1400 acres (and potentially 11,000+ acres under the TCA) from local and State regulation. It P311-05

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contains reasonably likely future impacts, unique risks, and the potential of setting precedent. (40 C.F.R. § 1508.27(a), (b).) It therefore requires the preparation of a substantive and thorough EIS.

P311-05 Cont.

A. The EA and FTT Improperly Assume Review Under the On-Reservation Standard For Off-Reservation Property. Because this Predicate Issue Is the Subject of Ongoing Appeal in connection with the TCA Approval, This Application Should Be Stayed.

Fee to trust applications are processed under two separate standards: on-reservation or off-reservation acquisition (25 C.F.R. §§ 151.10, 151.11). In processing an off-reservation proposal, the level of scrutiny is higher; the process also involves consideration of both the on-reservation criteria of § 151.10, and the additional factors such as business plan and economic analyses, of §151.11. The instant Camp 4 property is not on-reservation land. The FTT, and the supporting EA, therefore should be considered under the more rigorous standard of § 151.11.

The BIA has indicated that § 151.11 should apply. In its Notice of the FTT, dated September 17, 2013, the BIA expressly stated that the notice "is issued pursuant to Code of Federal Regulations, Title 25, INDIANS, and Parts 151.10 *and 151.11*." (Emphasis added.) Likewise, the FTT applicant indicated that § 151.11 should apply. It filed a "Notice of Non-renewal: Williamson Land Conservation Contract" as part of the FTT, in which it stated: "Notice of non-renewal is being given as part of that application to transfer the Property to the United States of America, to be held in trust for the Tribe (so-called "fee to trust" transfer) pursuant to 25 CFR 151.10 *and 151.11* . ." (EA, Appendix L, emphasis added.)

P311-06

However, the EA contradicts these statements. In section 1.2, the EA states: " . . land may be acquired in trust status for a tribe when the property is located within a Tribal Consolidation Area and *given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation*." (EA, page 1-5, emphasis added.) Based on the TCA approval, the EA therefore assumes that the lower level of scrutiny is involved for this FTT, and the EA does not address the additional criteria of § 151.11,[1] or provide an appropriate level of analysis to any of the factors actually discussed.

Thus, the only basis for invoking the off-reservation standard is the fact that the Camp 4 property is included in the TCA approval of 11,000+ acres. That approval, however, did not involve *any* environmental assessment. In effect, this turns NEPA policy and regulations upside down: it relies on a TCA procedure involving *no* environmental review to support lesser scrutiny in an FTT procedure which expressly requires strict scrutiny. Whether the TCA was properly approved, however, is the subject of numerous appeals. In addition, the TCA approval procedure has been questioned by letter dated September 20, 2013, from Senator Feinstein and

[1] As one example, the EA confirms that the acquisition will include "commercial enterprises." (EA p. 1-7.) However, no business plan or economic analyses are presented as to the agricultural operations, nor are there any commitments not to engage in other commercial operations.

Congresswoman Capps, to Director Michael Black. If the TCA approval is reversed, the instant EA is left entirely without foundation.

Both the FTT and the EA are grounded on the TCA approval. Because the validity of this approval is uncertain, however; and because this predicate, fundamental issue must be determined before any environmental review can be assessed, the matter should be stayed until the various appeals are final (including any subsequent judicial review).

P311-06 Cont.

B. The EA Does Not Provide Sufficient Evidence or Analysis of Relevant Matters and Demonstrates that an EIS Should Be Prepared.

P311-07

The EA provides an insufficient evaluation of numerous matters, among which are the following. The below listing is not comprehensive, and we reserve the right to comment further as appropriate, and to provide additional materials in furtherance of this process.

1. The EA Relies on Flawed Historical and Ethnographic Analysis

P311-08

The EA (and the FTT) are based on a purported geographical connection of the purported tribe to the Camp 4 property. This analysis is fundamentally flawed. There is no historical basis for a finding that there was a specific *Chumash* Santa Ynez tribe (until recent assertion), or that such a tribe had any rights in or to the property known as Camp 4. To the contrary, historical data confirm that the Camp 4 land was not intended by the Catholic Church to be held in trust for any individual or tribal group, but was expressly deeded by the Church to non-Indian persons.

2. The EA Does Not Adequately Address Water Resources and Impacts

P311-09

The EA generally describes water resources, but provides no clear analysis of the basin or the aquifer. It acknowledges, however, that the basin is "in a state of overdraft." (EA, Appendix C, p. 2-12.) The "project" analysis – based solely on the assumption that only 135 houses and existing vineyards will be involved – is flawed as it stands. In fact, substantial pumping will impact the aquifer system, and result in significant impacts beyond Camp 4. (See, Exhibit A, Comments by Phil Hall, B.Sc., M.Sc. ("Hall Comment").)

P311-10

It is important to note that typically a residential development such as the EA purports to propose would not need an expensive waste water treatment plant. Such a plant is generally only for commercial operations. (See, Hall Comment.) One must therefore assume that commercial operations are anticipated, although not discussed.

P311-11

In addition, because there are unexplained potential future impacts involving additional housing (1300 lineal descendents), and unknown commercial enterprises (a stable and horse facility are referenced but not explained; no business plan is provided for the vineyard operations; a second casino is provided for in the State Compact), the potential additional

impacts to water resources are grave. An EIS should be prepared which addresses these issues and properly analyzes potential water impacts. P311-11 Cont. P311-12

3. The EA Does Not Adequately Analyze the Stated Need For the Project Or the Alternatives

A basic factor required for fee to trust acquisition is an actual, existing need. (25 C.F.R. § 151.10(b).) The EA does not provide evidence of any such need. In fact, the applicant owns the Camp 4 property in fee. It may work through the available land use structure, as any other landowner may do, to obtain approval for reasonable uses, including housing development. Absent any showing of actual need, both the EA and the FTT are fundamentally flawed. P311-13

4. The EA Does Not Adequately Analyze Impacts to Surrounding Property Resulting From Incompatible Development

The EA fails to acknowledge numerous issues raised by the incompatibility of the use proposed to the existing local uses, the Santa Ynez Valley Community Plan (Plan) and other restrictions. One reading the EA would assume that the development, as proposed, would exist in a rural wasteland and not have any impact on adjacent properties. Not true.

For example, directly south of Camp 4 are existing horse facilities and agricultural operations. Drainage from Camp 4 runs to the south through adjacent parcels to the river. While the EA fails to consider the impact of development on these adjacent properties, substantial adverse impacts to these operations would result from the traffic, the use of reclaimed water, pollution, noise, and other features of the development. P311-14

In addition, the adjacent property has specific conservation easements in place which would be adversely impacted by the development. The withdrawal from the Williamson Act contract of the Camp 4 property, as well as the potential withdrawal of the TCA property if acquired and put into trust, would also have an enormous impact on the purposes and assumptions of the Plan and of the General Plan of Santa Barbara County.

5. The EA Does Not Assess Future or Cumulative Impacts

The EA does not consider the existence of future and cumulative impacts. There are reasonably likely future impacts, as shown above, by virtue of the EA admission that there are 1300 lineal descendents for whom housing (and/or land) is anticipated, as well as unexplained "commercial enterprises." This implicates substantial additional impacts to infrastructure (including, *inter alia*, roads, sewage, waste treatment, pollutants), and municipal services. P311-15

Additionally, the EA incorporates and is based on the TCA approval, thus involving additional potential acquisition which dwarfs Camp 4, and which would be removed from State and local regulation. The impacts of the TCA area, and its removal from State and local land use P311-16

regulation, must be considered. The TCA approval, in and of itself, impacts hundreds of privately owned parcels.

P311-16 Cont.

C. Conclusion

An EIS must be prepared where the impact is highly uncertain, there are unique risks, and the action has the potential of setting precedent. (40 C.F.R. § 1508.27(a), (b).) That is the case here. For the foregoing reasons, an EIS should be prepared, including substantive analysis and evidence.

P311-17

Thank you for your consideration of these comments.

Very truly yours,

CAPPELLO & NOËL LLP

A. Barry Cappello
Attorneys for Nancy Crawford-Hall

cc: Chad A. Broussard, Environmental Protection Specialist
via email: chad.broussard@bia.gov

Comments:

Proposed Groundwater Development, Camp Four

Points were raised at a recent Water Board meeting that the wells on Camp Four were outside the I.D. #1 area, they were far away and in a different aquifer, hence the impact will be negligible. I strongly disagree with this assumption.

It will take several years for the impact to be noticeable, but it will have severe impacts on the groundwater wells and groundwater resources of I.D. #1.and neighboring wells.

Each individual well on Camp Four can pump between 1,000 and 2,000 gallons per minute (gpm); this is equivalent 4.4 to 9 acre/ft/day or 1600 to 3000 acre/ft/year.

Recharge from precipitation in this area is roughly 5 to 10% of precipitation, zero in years like this. For 1400 acres this would yield recharge of roughly 120 acre/ft/year, assuming 1 inch of recharge.

Any pumping above this level will result in groundwater being taken from surrounding properties, lowering their water levels and possibly resulting in wells having to be drilled deeper.

Proposed developments for the site are 135 homes and 300 acre/ft/yr., using their own numbers, using I.D. #1 consumption rates this same development would require 500 acre/ft/yr. A housing development of this nature would normally have in individual household wells or small wells serving clusters of 5-10 homes. A central water system would not be cost effective. Also home developments like this would use septic tanks and drainage fields. Expensive waste water treatment plants are generally only used for commercial operations. We can thus assume that any actual development will be more commercial in nature and could thus easily use 1,000, 2,000 or 5,000 acre/ft/yr. or more.

P311-18

Grapes grown on 1400 acres would require 2,800 a/ft/yr., 2 feet per acre, which is almost twice the annual rainfall. We are currently witnessing major groundwater problems in San Luis Obispo County and the Paso Robles area, due to pumping groundwater for thousands of acres of grapes. These problems have taken 5-10-15 years to manifest themselves. It is being proposed to stop further development of groundwater in these areas. This will not stop the decline of groundwater levels. Only cutting back pumping severely will reduce the decline.

Clearly the pumping of more than the 100 acre/ft/yr.received from recharge will result in massive groundwater mining, which will impact the entire aquifer system. The cones of

depression will extend beyond Camp Four. Once the impact reaches the edges of the aquifers, the drawdown will accelerate and water will leak from one aquifer to another, impacting everyone.

For example, if groundwater levels fall 5 feet in the first 5 years they could easily continue to fall at more than a foot a year, after the cones of depression reach the edge of the aquifer.
Predicting the decline of groundwater levels requires the use of complex equations and computer models. However, these eruptions are linear, so that once we have solved the problem for one pumping rate, say 1000 acre/ft/yr., then the effects of pumping at 2000 acre/ft/yr will be approximately double.

What can be done to assess this problem?

I.D. #1 has a groundwater model of the aquifer basin, it could be modified and used to predict the impact of pumping at various pumping rates.

I would suggest the following steps:

(1) First run the groundwater model without including the new Camp Four pumping schedule. Contour water levels and drawdown for 5,10,15,20 and 25 years. This will be the baseline case. P311-18 Cont.

(2) Run the same model with 500; 1,000, 1,500 and 2,000 af/yr pumping from Camp Four.
Compare with the baseline model and contour/ graph the difference in drawdown or water levels with the baseline case.

(3) Identify wells that will be impacted and set up a monitoring program to record water levels.

(4) compare water levels with predicted levels and refine the model to improve predictions.

Using the model and keeping water level records can be used to show and prove the impacts of excessive groundwater pumping on Camp Four

Unintended Consequences

The above clearly shows that Camp Four cannot sustain large-scale groundwater withdrawals, even for use on the site itself. If hotels, casinos and resorts are built, there will come a point when the wells will run dry. What is going to happen then? Will I.D#1

have to come to the rescue? Or will pipelines be proposed? Bringing in pipelines will require a lot of money for construction and operation. The solution to this would be to develop another San Fernando Valley.

P311-18 Cont.

I hope that this problem is not pushed down the road for 5, 10 or 15 years. This is a major problem that is about to start now.

Phil Hall
Retired Hydrogeologist
P.O.BOX 1031
Santa Ynez, CA 93460

Email. phil@sanlucasranch.com

Phil Hall, Bio

B.Sc., Magna Cum Laude, Geology, with majors in Mathematics and Probability Theory, University of Wales, 1966
Post graduate Diploma in Hydrogeology, M.Sc. In Hydrogeology, University of London, 1967

Early career was spent on groundwater mapping and exploration in Western Canada. This was followed by the development of groundwater supplies for towns and irrigation projects in British Columbia for British Columbia Water Resources Service.

While Head of the Groundwater Division, James F. MacLaren, a Civil Engineering Consulting Company, he was responsible for the development of water supplies across Canada, Greece, Haiti and Jamaica, and developed techniques to monitor and control groundwater pollution from landfill sites and oil spills. He also wrote guidelines for the Federal Government on controlling groundwater pollution from oil spills.

Vice President of a Geotechnical firm in Alberta, involved in the dewatering major mines and other excavations.

President, Groundwater Consultants Group. Involved in the development of groundwater supplies; dewatering excavation sites; and groundwater pollution investigations. Clients included various Canadian Federal and Provincial Agencies. Major companies, including Esso, BP, Shell, Home Oil, Union Oil, Dow Chemical, plus numerous coal companies, including Syncrude Canada.

Principal Hydrogeologist, The Hydrodynamics Group; Earthware of California.
He developed groundwater software for data analysis, computer modeling and database management. The software was used in more than 100 countries, including the Geological Surveys of Canada, U.S.G.S, Britain, France, Germany, Botswana and the United Nations, U.S. E.P.A., and numerous State Agencies. He also taught groundwater modeling at several universities across North America, Cambridge and London. He also taught courses for E.P.A. and numerous State Water Agencies. He invented the use of graphic pre- and post-processors for computer models and pioneered the use of databases for managing groundwater data.

He was a consultant to E.P.A. and Corps of Engineers on major projects in the Phoenix area, San Fernando Valley, plus technical judicial arbitrator between R.W.Q.C.B. and Union Oil.

He has published numerous papers and reports and has written a text book on testing water wells and aquifer systems.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years and not a party to this action. My business address is 831 State Street, Santa Barbara, California 93101. On October 4, 2013, I served the foregoing document described as **Comments on the Environmental Assessment (EA) for the Santa Ynez Band of Chumash Indians (Tribe) Camp 4 Fee-to-Trust Acquisition Project** on the interested parties in this action:

SEE ATTACHED SERVICE LIST

☒ **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I enclosed the document in a sealed envelope or package addressed to the person(s) at the address(es) above and placed the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Santa Barbara, California, in a sealed envelope with postage fully paid.

☐ **BY FACSIMILE:** The document(s) were served by facsimile. The facsimile transmission was without error and completed prior to 5:00 p.m. A copy of the transmission report is available upon request.

☐ **BY OVERNIGHT DELIVERY:** The document(s) were served by overnight delivery via FedEx. I enclosed the document in a sealed envelope or package addressed to the person(s) and the address(es) above and placed the envelope(s) for pick-up by FedEx. I am readily familiar with the firm's practice of collection and processing correspondence on the same day with this courier service, for overnight delivery.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **BY HAND DELIVERY:** The document(s) were delivered by hand during the normal course of business, during regular business hours.

☒ (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☐ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 4, 2013, at Santa Barbara, California.

Anne Marie Balash

SERVICE LIST

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825
BY U.S. MAIL

Chad A. Broussard
Environmental Protection Specialist
Bureau of Indian Affairs
Pacific Regional Office
chad.broussard@bia.gov
BY E-MAIL

[redacted]

GERALD ROUNDS
4045 EAST OAK TRAIL
SANTA YNEZ, CA 93460
October 5, 2013

Mr. Chad Broussard
Bureau of Indian affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Broussard,

Re: My comments on the Chumash Camp 4 Environmental Assessment.

I have just opened the EA and looked at one portion, the list of encountered birds.
The birding community has been aware in the last several years of the presence of Longspurs wintering on the property. Each winter and spring, one can often see patient observers scaning the Camp 4 fields from the public road. The more skilled birders are able to spot McGowan's, Lapland and Chestnut-collared Longspurs amongst the flocks of Horned Larks. These birds breed in the far north and are considered rare in Southern California. Other birds found there subject to displacement include Merlin and Prairie Falcon. None of these species are found in the table "Wildlife Observed" on page 473.
Based upon the above, I conclude the EA to be incomplete, despite the 968 pages.

P312-01

Thank you.

Sincerely,

Gerald Rounds

Broussard, Chad <chad.broussard@bia.gov>

ENVIRONMENTAL IMPACT ASSESSMENT OF S.Y. CHUMASH TRIBE T.C.A. & CAMP 4

1 message

carol white <cwcpsa@gmail.com> Sat, Oct 5, 2013 at 4:05 PM
To: chad.broussard@bia.gov

DEAR MR. BROUSSARD,

I AM A RESIDENT OF THE SANTA YNEZ VALLEY, SANTA BARBARA COUNTY.....I STRONGLY OPPOSE THE UNPRECEDENTED CHUMASH "TRIBAL CONSOLIDATION AREA APPROVED BY YOUR OFFICE.....AND ALSO OPPOSE THE FEE TO TRUST OF CAMP 4.

THE CAMP 4 PROPERTY IS ONLY TWO MILES FROM THE SANTA YNEZ VALLEY HIGH SCHOOL AS WELL AS OTHER AREA SCHOOLS AND THE EXISTING CASINO IS ONLY ONE HALF MILE FROM OUR HIGH SCHOOL. I DONT KNOW IF YOU ARE AWARE OF THE HORRIFIC IMPACT THE CURRENT CASINO HAS ON OUR TEENAGE YOUTH IN THE SANTA YNEZ VALLEY.....I KNOW FROM CLERGY IN THE AREA THAT THEY HAVE BEEN NONSTOP COUNSELING FAMILIES AND TEENAGERS.....

RE: DRUGS, GAMBLING, AND DRINKING DONE IN AND AT THE PRESENT CASINO AND PARKING AREAS BY OUR RESIDENT TEENAGERS.

P313-01

SINCE THERE IS ANOTHER VIABLE GAMING PERMIT AVAILABLE TO THE TRIBE, IT WOULD BE UNWISE TO ALLOW THE TRIBE TO GO INTO TRUST WITH ADDITIONAL PROPERTY.....NOT ONLY UNWISE.....BUT DISASTROUS.

P313-02

I ALSO AGREE WITH ALL THE OPPOSITION LETTERS YOU HAVE RECEIVED REGARDING THE MANY OTHER ENVIRONMENTAL IMPACTS SOME OF WHICH ARE WATER RIGHTS, CONTROL OF USAGE AND CONTAMINATION OF WATER, THE IMPACT ON THE ECOLOGY, THE IMPACT ON THOUSANDS OF U.S. CITIZENS LIVING IN THE TCA, ECONOMICALLY AS WELL AS MORALLY, AND THE ECONOMIC IMPACT OF LOSS OF REVENUES COMBINED WITH AN INCREASE IN USE OF RESOURCES.

P313-03

VERY TRULY,

MIMI WALSTON
300 FREYA DR.
SOLVANG, CA 93463

Broussard, Chad <chad.broussard@bia.gov>

STOP Chumash fee to trust for Camp 4 and TCA

1 message

Lloyd Mills <lloydmills@verizon.net> Sat, Oct 5, 2013 at 10:07 PM
Reply-To: Lloyd Mills <lloydmills@verizon.net>
To: Chad.broussard@bia.gov

I am writing to ask you to further look into the case of the Santa Ynez Valley Chumash Tribe asking for approval of the TCA and also the Camp 4 Annexation. I understand that one of the requirements of putting Camp 4 into Fee to Trust is financial issue with the Chumash. This is not a poor tribe but one that earns very large amounts from its gambling Casino and distributes $45,000. non taxable funds per month to many of its members. I believe the BIA approved Chumash requests for Fee to Trust on Camp 4 and approved TCA without proper notice to community members and local government. All of a sudden, the TCA--which many of us have never heard of--has been approved. Please listen to our Santa Barbara County Board of Supervisors in their refusal to vote for these projects. P314-01 P314-02 P314-03

I and my family do not wish to see our beautiful Valley torn apart by the sudden Chumash claims to property. The Chumash already own the Camp 4 property and must they really have the right to pay no taxes on it and not have to follow community plans for this land, including the fact that Camp 4 is in Agricultural Preserve land? I urge you to give more thought to changing the status of this land on both Camp 4 and also the further step of TCA. P314-04 P314-05 P314-06

I have lived in the Santa Ynez Valley since 1972 and am a voter here. Mary Lloyd Mills

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment Protest of Camp 4 Annexation and TCA

1 message

Marvin Johnson <jandm@silcom.com> Sat, Oct 5, 2013 at 11:14 PM
To: amydutschke@bia.gov, chad.broussard@bia.gov
Cc: 3rd District Supervisor Doreen Farr <dfarr@countyofsb.org>, Congresswoman Lois Capps <aaron.shapiro@mail.house.gov>, Senator Dianne Feinstein <devin_reinerson@feinstein.senate.gov>, SYV Concerned Citizens <info@syvconcernedcitizens.com>

We are writing as a home owners in Santa Ynez, CA with concerns for the potential adverse effects to the environment that could impact our family and all of the Santa Ynez Valley community if the process of "Fee to Trust" of Camp 4 property and the TCA are allowed to go forward. We humbly ask you to use your positions with the BIA to stop this process from going forward and for you to reconsider the direction that these processes are going with the negative impacts these decisions could make on 1000's of people in our community and beyond now and in the future. P315-01

There are many reasons we are opposed to the annexation of Camp 4 property to the Santa Ynez Band of Chumash Indian Reservation and the TCA to expand that potential to over 11,000 acres being more easily annexed in the future. P315-02 We are not opposed to the Chumash owning these properties and using them as private U.S. citizens while following the rules and regulations of local and county governments as all U.S. citizens must. WE ARE OPPOSED to these lands being put into trust to become part of their reservation thus making them part of a sovereign nation and taking away any input or control of the land usage from all non-tribal citizens and local governments as well. The negative impacts including those to the environment need further consideration. If the BIA allows Camp 4 or any property within the TCA boundaries to be annexed to the Chumash Reservation there would be a total loss of influence or control of the SYV community over it which we feel would destroy the character of this rural community and would be contrary to the current general plan. P315-03

Two of the major environmental concerns we have that definitely need further consideration are: P315-04

1) Impact on water supply and quality for Santa Barbara County residents. It is our understanding that the Camp 4 property sits on top of an aquifer that supplies water for a large portion of SB County. The supply of water could be affected depending on how the tribe uses the property and the water beneath it. The proposed Chumash controlled waste water treatment plant on Camp 4 property could impact the quality of water coming through the aquifer and being used by other SB County residents. Our concern is not just for the stated plans that the tribe is proposing for the Camp 4 property. Once this or any other land is accepted into trust there would be no regulations from local government to restrict the development of the property to include uses way beyond what the Chumash are currently proposing in their application for "Fee to Trust" of Camp 4. That would inevitably affect both the supply and the quality of water to non-tribal citizens of SB County. Additional housing, large events held on the property and even a casino are all uses that could easily be added to their plans in the future without consideration of the general plan for land use of the SY community that was established to be in the best interest of the SY Valley as a whole. The tribe would no longer have to seek approval from the community or the local government to make any additions IF this property is annexed to the Chumash Reservation. We view this as wrong and totally unacceptable.

P315-04 Cont.

P315-05

2) Noise, traffic and light pollution are issues that will impact the environment in the Santa Ynez Valley without any input or control by either the citizens of our Valley or the local government if the tribe's application for "Fee to Trust" is approved. In addition to the housing that is being proposed to be built, the tribe's application includes the plans for building a banquet/exhibition hall with 400 parking spaces that would also allow special events to be held on this land. This part of the plan alone is of great concern for the environmental impacts that would occur due to the additional volume of people and traffic coming in and out of the area. This is totally contrary to the current agricultural land use that the general plan has set for that property.

P315-06

P315-07

Please listen to us and to all the other citizens in the Santa Ynez Valley and larger Santa Barbara County area that stand to be adversely affected if Camp 4 or any land in the TCA is allowed to be annexed to the Santa Ynez Band of Chumash Indian Reservation. We request you to use your influence in the BIA to stop the current Camp 4 "Fee to Trust" application from going forward

P315-08

and to eliminate the TCA which is part of that application. There are many vital concerns to consider including the environmental issues mentioned above.

P315-08 Cont.

Thank you,

Jane and Marvin Johnson

1329 Calzada Avenue

Santa Ynez, CA 93460

(805) 688-2006

2490 Baseline Ave.
Ballard, Ca 93463
Oct. 5, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Environmental Assessment for proposed Trust Acquisition of Five Parcels Knows as the Camp 4 Property, Santa Ynez Band of Chumash Indians, Santa Barbara County, California

Dear Ms. Dutschke:

I offer the following comments to the referenced EA.

An EA is a document to provide clarity and transparency in the analysis of impacts and alternatives considered in making a decision; taking a federal action. This EA says that the decision to be made, or Proposed Action, is to take fee title lands owned by the Chumash tribe into federal trust status.

NEPA requires a reasonable range of alternatives be considered. This analysis uses land assignments and housing development as the alternative to changing land status. This is not a reasonable alternative; it is another action.

While this analysis contains information regarding development alternatives and effects, the proposed action is not analyzed in similar detail.

The analysis as documented in the EA fails to meet the legislative intent and implementing regulations for NEPA as defined in the Code of Federal Regulations. As a consequence, this EA fails to provide sufficient information to make an informed decision regarding the proposed action of changing the land status. It is clear that the purpose and need is to provide tribal housing. It is also clear that the Chumash have a legal right to request trust status for the parcel. The affected environment should address more fully the legislation that provides this right to the tribe; the legislative intent, and the implementing regulations. What are the criteria to be addressed in making the decision to take lands into trust from fee title lands owned by a tribe? What is the relevant case law?

P316-01

The analysis does show considerable attention to environmental effects of proposed housing development alternatives. How to develop the housing is not the issue to be decided in this EA according to the proposed action. Though housing is the purpose and need, development of that housing is a separate action. The decision is a change in land status.

The issues and concerns, and effects, of the decision to take the land into trust status should be analyzed and documented. The existing EA is inadequate. In fact, it confuses the issue rather than clarifies.

The EA addresses a No Action alternative in Mitigations. No Action is defined as no development of the land – no change in use. Housing development under fee title status would be a reasonable alternative to the proposed action and No Action alternatives. What precludes housing development while in fee title land status?

P316-01 Cont.

The economic analysis documented does not speak to the Tribe's economic issues in requesting trust status. Does trust status allow for financial assistance for development; assistance that is not available if the land is held in fee title?

P316-02

The economic analysis of Santa Barbara County's loss of property tax revenue uses recent figures when the land is under Williamson Act tax reductions. The economic analysis for the loss of property tax should be based on the figures as if the land was developed, not under agricultural special tax reductions. The portion of the county's total tax revenue this represents is not relevant. The benefit from county services that that money represents is the relevant issue.

P316-03

I would like to see Cumulative Effects consider two large projects apparently approved but not yet developed; Mattei's Tavern Convention Center along Hwy. 154 in Los Olivos and the Senior Care facility at the corner of Refugio and Hwy. 246 near the reservation. All three projects will contribute to traffic load in the area and water use. They will have effect on the quality of the human environment in the valley as the added traffic demands accumulate. The recreation and tourist traffic has increased greatly over the last several years and continues to increase. Local roads are popular with tours, tourists, and bicyclists.

I do understand that existing and new wells on the parcel will provide for the proposed housing. However, the accumulated draw of all development projects and will have an effect on the finite supply of valley water. Wells are the legal right of the land owner, but the county is ignoring a larger issue when approving other development projects that affect the overall water supply. However, I would rather see water reserves spent on housing for locals such as the Tribe rather than on commercial enterprises funded by outside investors to provide for tourism.

P316-04

The existing documentation of the analysis regarding proposed fee title to trust for the Chumash confuses rather than clarifies the decision to be made. It is the issues and concerns, and effects, of that decision that should be analyzed, not effects of development. The existing document provides a great disservice in confusing the issue to be decided by analyzing another issue, development. The analysis should elucidate effects of the decision to be made.

P316-05

Sincerely,

Joan E. Brandoff

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

comments to Chumash EA

1 message

Joan Brandoff <joanbrandoff@outlook.com> Mon, Oct 7, 2013 at 8:13 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: "dfarr@countyofsb.org" <dfarr@countyofsb.org>

I submitted comments to the EA, but failed to include comments regarding the Cultural Resource section, which I provide here:

The EA did not include information about the archaeological sites found, but did include their locations on Figure 2-1, "Land Use Summary" for the Alt. A site plan. Standard practice is to provide some information about the constituents of sites, and an assessment of their significance. Publishing the site locations is definitely a breach of confidentiality and inappropriate.

36 CFR 800 requires consultation with SHPO regarding both the adequacy of the cultural resources inventory as well as concurrence with the assessed significance of the sites in order to determine which sites are entitled to protection. SHPO also comments on those protection measures for adequacy. There is no indication in the document that SHPO has or will be consulted as a requirement for federal actions. Protection measures are designated for the construction phase, but continuing use poses adverse effects as well and is not addressed. It appears that the determination of significance issue is dismissed; "None of these resources appear to be accompanied by especially complex archaeological deposits." If this is an argument for insignificance, it is an extremely weak one. Significance is not based on complexity of the deposit. In fact, sites with singular constituents, such as ground stone aggregates or chipped stone sites, can have depth of deposit and prove to have significant scientific information. Without information, other than site locations, and without SHPO consultation and concurrence, the Cultural Resource section does not meet NEPA and CFR requirements.

P317-01

Joan Brandoff

Broussard, Chad <chad.broussard@bia.gov>

Comments on the NEPA Process and the Environmental Assessment Prepared for the Camp 4 Annexation

1 message

rachel <rachel@platinumperformance.com> Mon, Oct 7, 2013 at 9:23 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: rachel <rachel@platinumperformance.com>

To Whom this may concern:

We are against the Annexation of Camp 4 in the Santa Ynez Valley, CA.

1.The project is controversial with many potentially significant impacts. Preparation of an EIS would provide a more robust and comprehensive analysis of potential impacts, a more transparent environmental review process, and more opportunities for public and agency involvement. P318-01

2.The EA does not adequately cover all potential future development. It is reasonably foreseeable that future development could include: P318-02

- A casino because the Chumash obtained two gaming permits and have only used one to date. P318-03
- A casino or other large revenue-generating development because such additional development would fulfill the economic opportunities the Chumash have stated would be provided to allow "the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises" (as stated on page 1-7).
- A banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, a tribal community space including ceremony room and gymnasium (nearly 80,000 sf), and approximately 400 parking spaces would be provided for the facilities (as stated on page 2-14 of the EA). The EA does not address the impacts of this potential future development. Thus, the potential impacts of the project have been underestimated in the EA and could be significant, particularly in terms of construction-related emissions, traffic, and noise; increased traffic, noise, and light from operation; increased demand for water supply and other services; and impacts on natural and biological resources. P318-04

3.The issue of water supply and impacts on the groundwater aquifer has not been adequately addressed. The proposal states that the tribe would develop an onsite water supply system using groundwater to meet the increased demand for water. The EA does not provide adequate information on the impacts to the aquifer and to the existing and future water supply of others dependent on the aquifer. P318-05

4.Traffic impacts have not been adequately addressed. The project description states that existing access roads would be improved (it does not specify how) and new roads would be constructed. The EA does not adequately address the impacts of additional traffic that would result from Camp 4 development or other potential future development such as a casino. P318-06

5.Impacts to biological resources have not been adequately addressed. The analysis focuses on federally listed plant and wildlife species, critical habitat for these species, and migratory birds. It should also properly address impacts to state-listed and non-listed species and habitat, not dismiss them in Sec 3 Affected Env. P318-07

6.Impacts to cultural resources have not been adequately vetted with respect to Native American Heritage Commission (NAHC). The EIR (p 3-48) indicates the NAHC provided a list of individuals and groups for consultation, but it does not indicate if such consultation occurred. P318-08

7.The Land Use analysis should disclose consistency with the Santa Ynez Valley Community Plan. Although the plan is described in Sec 3.8.2, it is dismissed in Sec 4.1.8 because project parcels are exempt from County land use regulations (25 CFR Part 151 Trust Acquisition). For full disclosure, the EA should discuss the project's consistency with local plans, even if potential inconsistencies are found less than significant because of the exemption. P318-09

8.In Sec 4.5.2, it is stated that no significant, unmitigated impacts have been identified for Alternative A and B. I argue that the potential impacts need to be fully analyzed in an EIS before this conclusion can be reached for the reasons stated in this letter. P318-10

9.Cumulative traffic impacts were determined less than significant based on mitigation measures provided in Section 5.7. However, there is no assurance that the mitigation can be implemented nor is there a timeframe for when they would be implemented, because they are under the control of other agencies and required additional funding not yet secured. Due to this uncertainty, this impact should be determined significant and unavoidable. P318-11

Sincerely,

Rachel Mojonnier

P.O. Box 959
370 Perkins Street
Los Alamos CA 93440

Broussard, Chad <chad.broussard@bia.gov>

A Santa Ynez resident's request for further investigation on the NEPA Process and the Environmental Assessment Prepared for the Camp 4 Annexation

1 message

Kelly McConnell <kmcconnell@princelionheart.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Mon, Oct 7, 2013 at 9:30 AM

Dear Mr. Broussard,

I have been a resident of Santa Ynez since 1988. My family moved there from Orange County to escape from the traffic and congestion and live a simpler life. I have returned to the Valley as a parent so that I can afford my son the same "simple" life in a community that comes together in times of need.

4 years after moving to the Valley, my brother was involved in a car accident, along with three other 16 year old valley residents. It was an innocent accident that rocked the valley as a teenage girl died, my brother was left a paraplegic, and the road to recovery for our valley was long and steep. I will never forget the many acts of kindness and concerned souls who lined the hallways for weeks on end outside of the ICU at Cottage Hospital, the flowers that were always kept fresh in the ICU family room, the water and snacks that turned up just in time, the offers to help with medical bills from complete strangers, the random acts of kindness were overwhelming and spoke volumes for a valley that embraced a transplant family from southern California. P319-01

The Valley is a very caring place with a concerned community. Though decades have passed, my family continues to call Santa Ynez its home as we raise the next generation there. We are constantly reminded of the care and concern that was shown to our family as we see the support rallied around valley families who have tragedy strike their lives. The concern comes from the right place, just as it does here today.

Our Valley has already seen a changed landscape with the arrival of the commercial hub of the Casino: more cars, the first stop lights EVER, more car accidents and emergency response incidents, more buses and fumes, higher crime, more lights at night to rob us our stars, the list goes on. To think that the expansion of sovereign rights to more territory wouldn't have an environmental impact would be short-sighted as it has and it will. There are many concerned citizens who are not receiving a penny to voice their concerns and stand to benefit in no way at all other than to preserve the valley that we residents love. Please allow us the chance to be P319-02

heard as a project of this magnitude certainly warrants additional analysis being conducted.

P319-02 (Cont.)

No one has a crystal ball, but after my layman's cursory review of the proposed project and my understanding of the purpose of the EA, it is clear that an Environmental Impact Statement (EIS) is the appropriate NEPA documentation and process – NOT a Finding of No Significant Impact (FONSI) - for the reasons described in the comments below:

1.

The project is controversial with many potentially significant impacts. Preparation of an EIS would provide a more robust and comprehensive analysis of potential impacts, a more transparent environmental review process, and more opportunities for public and agency involvement.

P319-03

2.

The EA does not adequately cover all potential future development. It is reasonably foreseeable that future development could include:

•

A casino because the Chumash obtained two gaming permits and have only used one to date.

•

A casino or other large revenue-generating development because such additional development would fulfill the economic opportunities the Chumash have stated would be provided to allow "the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises" (as stated on page 1-7).

•

A banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, a tribal community space including ceremony room and gymnasium (nearly 80,000 sf), and approximately 400 parking spaces would be provided for the facilities (as stated on page 2-14 of the EA).

The EA does not address the impacts of this potential future development. Thus, the potential impacts of the project have been underestimated in the EA and could be significant, particularly in terms of construction-related emissions, traffic, and noise; increased traffic, noise, and light from operation; increased demand for water supply and other services; and impacts on natural and biological resources.

P319-04

3.

The issue of water supply and impacts on the groundwater aquifer has not been adequately addressed. The proposal states that the tribe would develop an onsite water supply system using groundwater to meet the increased demand for water. The EA does not provide adequate information on the impacts to the aquifer and to the existing and future water supply of others dependent on the aquifer. P319-05

4.

Traffic impacts have not been adequately addressed. The project description states that existing access roads would be improved (it does not specify how) and new roads would be constructed. The EA does not adequately address the impacts of additional traffic that would result from Camp 4 development or other potential future development such as a casino. P319-06

5.

Impacts to biological resources have not been adequately addressed. The analysis focuses on federally listed plant and wildlife species, critical habitat for these species, and migratory birds. It should also properly address impacts to state-listed and non-listed species and habitat, not dismiss them in Sec 3 Affected Env. P319-07

6.

Impacts to cultural resources have not been adequately vetted with respect to Native American Heritage Commission (NAHC). The EIR (p 3-48) indicates the NAHC provided a list of individuals and groups for consultation, but it does not indicate if such consultation occurred. P319-08

7.

Impacts to schools were determined negligible with no quantification because a majority of potential residents already reside in the area. The number of students generated from the residential development should be quantified, and the capacity of schools disclosed. P319-09

8.

Noise impacts have not been adequately addressed. In Sec 4.1.10, it states that construction noise levels would fluctuate depending on the type, number, and duration of uses of various pieces of construction. This should be quantified with standard assumptions. Table 4-8 lists typical construction noise levels for different activities, but the analysis does not consider a worst case scenario with multiple activities and construction equipment in use at the same time. The nearest sensitive receptor is a residence located 200 feet from main area and 100 feet from haul routes. Potential impacts that are not properly disclosed, and no mitigation is proposed or required. P319-10

9.

Impacts to visual resources were determined less than significant because, as stated in Section 2.0, "Lighting would only occur at street intersections and residential areas. The lighting would consist of pole-mounted lights, limited to 18-feet tall, with cut-off lenses and down case illumination to the extent feasible". There would be no lighting at any of the non-residential facilities? There would be no exterior lights on structures (only pole-mounted lighting)? Lighting at proposed community facilities or at potential future development not addressed would surely include some exterior lighting that could create substantial night time light in the area. P319-11

10.

The Land Use analysis should disclose consistency with the Santa Ynez Valley Community Plan. Although the plan is described in Sec 3.8.2, it is dismissed in Sec 4.1.8 because project parcels are exempt from County land use regulations (25 CFR Part 151 Trust Acquisition). For full disclosure, the EA should discuss the project's consistency with local plans, even if potential inconsistencies are found less than significant because of the exemption. P319-12

11.

In Sec 4.5.2, it is stated that no significant, unmitigated impacts have been identified for Alternative A and B. I argue that the potential impacts need to be fully analyzed in an EIS before this conclusion can be reached for the reasons stated in this letter. P319-13

12.

Cumulative traffic impacts were determined less than significant based on mitigation measures provided in Section 5.7. However, there is no assurance that the mitigation can be implemented nor is there a timeframe for when they would be implemented, because they are under the control of other agencies and required additional funding not yet secured. Due to this uncertainty, this impact should be determined significant and unavoidable. P319-14

13.

Mitigation measures for several impacts are weak and do not include enough detail to ensure they will be implemented properly. Some examples:

a.

Sec 2 (p 2-10). It states that all identified wetland areas and California Live Oak would be avoided "to the maximum extent feasible". This is subjective and does not ensure appropriate mitigation, nor does the mitigation presented in Sec 5. P319-15

b.

Sec 5.4. The mitigation only addresses the loss of oak trees. The mitigation is deferred, relying on a future arborist report to identify oak trees required for removal and require no net loss. The mitigation measure should specify replacement ratios. Additionally, there should be mitigation for other tree loss.

c.

Sec 5.4. The mitigation includes replacement of waters of the U.S at a 1:1 ratio, but does not specify if this ratio is acceptable to the USACE and does not indicate where the new wetlands could be located.

P319-15 (Cont.)

d.

Sec 5.5. The mitigation only recommends (not requires) that there be a stop work order if any prehistoric, historic or paleontological resources or human remains are found. With 16 cultural resources identified during an intensive field survey (4 archaeological sites, 9 isolated artifacts, 3 historic stock troughs), required mitigation measures should include qualified professionals monitoring construction and stop work orders if any potential resources are found (the recommended measures should be required).

P319-16

e.

Sec 5.7. The mitigation for traffic includes the tribe contributing its fair share to the funding of traffic improvements, which does not ensure that these improvements will be made because it is the responsibility of other agencies and it is not certain that adequate funding from other sources will be available. Because of the lack of uncertainty with this mitigation, this impact should be determined significant and unavoidable (triggering preparation of an EIS and EIR).

P319-17

14.

The EA does not include a discussion of the secondary impacts from mitigation measures, such as constructing new groundwater wells, a new wastewater treatment plant, creating a wetland mitigation site, and traffic/transportation improvements.

P319-18

15.

Any "mitigation measures" (i.e., protective measures, best management practices) presented in Section 2.0 as part of the proposed project should be included in Section 5.0, Mitigation Measures. All mitigation measures listed in Section 5.0 should be required (not recommended) and agreed upon by the BIA with signature.

P319-19

16.

Several permits and approvals from regulatory agencies will be required. Informal consultation and coordination with these agencies should be initiated during the environmental assessment

P319-20

process to obtain their input on impacts and mitigation measures. This will help ensure consistency with permit requirements. Agencies to consult include, but are not limited to: U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), State Historic Preservation Officer (SHPO), California Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), Caltrans, County of Santa Barbara.

P319-20 (Cont.)

17.

A joint EIS/EIR should be prepared. Discretionary approvals by state and local public agencies require compliance with the California Environmental Quality Act (CEQA). The appropriate CEQA documentation for this project is clearly an environmental impact report (EIR). Both CEQA and NEPA encourage the preparation of joint documents for efficiency and consistency

P319-21

If you have not been to our Valley, please come pay us a visit. In very little time, you will get a feel for what a special place it is and how one large stone can make many waves that will be felt by all creatures great and small. Thank you for your time and consideration.

Warm regards,

Kelly McConnell

Broussard, Chad <chad.broussard@bia.gov>

NEPA Process and the Environmental Assessment Prepared for the Camp 4

1 message

Fred Garcia <freddygarcia805@gmail.com> Mon, Oct 7, 2013 at 10:19 AM
To: chad.broussard@bia.gov

Dear Mr. Broussard,

As a resident of the Santa Ynez Valley of 33 years, I have grown up to see this Valley change in many ways. It has been a life long dream to be able to raise my children in the same area I grew up in, which I am currently doing. Buying a home in a place I've called home has been a blessing, but I fear things are going to change rather quickly in this Valley. I am writing so I am heard and I can share my story of struggle to afford a home for my family and children in this valley. I fear that my home purchase after 33 years of residency will be in vain if the development of Chumash Camp 4 moves forward. P320-01

Schools will be impacted not only by the new residents, but of the massive amount of employees the casino will bring to the valley. Not to mention the traffic and accidents! Our small town's roads are already being clogged up by big casino employee buses and drunk drivers heading to the Casino. P320-02

This new development will destroy the Santa Ynez Valley and suck the Valley of every resource we have. P320-03

1. Water planning is not stated in any of the planning from what I've read. What's going to happen to our water supply? P320-04
2. Oak trees will be taken out of the landscape that have been there for hundreds of years!
3. Buildings will replace the beautiful area that many animals live on. Migrating ducks, endangered steal head trout, endangered nutes. What type of biological problems will this create? Why is that not in writing somewhere? Is that the Chumash way? P320-05
4. Why don't any analysis talk about the increased crime rate in the SY Valley in comparison to the small grants the Casino is giving to local law enforcement? Dozens of close friends and family have had their cars and homes burglarized! That's not the safe town I grew up and in fought so hard to stay in. P320-06
5. The Casino is granted one gambling permit. How will they split that into two areas? P320-07

Mr. Broussard, this valley/land is sacred to many of us, Chumash included. Development will bring crime, problems and destroy the land the Chumash once fought to preserve. The lust for money and capitalism has blinded many and will effect a large community of proud Americans who will suffer property value loss and home security. I worked hard and long to purchase a home in the place I called home. This development will effect the future of my children and possibly end the future generation of my family in this area. Please take that into consideration and please reconsider the approval of this land. P320-08

With the utmost respect and regards,

Fred Garcia
2069 Village Lane
Solvang CA, 93463
805-686-2050
freddygarcia805@gmail.com

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Camp 4 Santa Ynez Chumash

1 message

Stefani Batastini <Stefani@thelarsoncompanies.com> Mon, Oct 7, 2013 at 10:48 AM
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

We are opposed to the Camp 4 annexation as the indian tribe will not be held accountable for any use of the property in the future. The Chumash Mission Indian band state that they are going to build a housing complex. There will be no limit as to how large the homes will be, how much dirt will be moved to create 'building pads' and they will not have to comply with any government agencies including environmental agencies, county building codes, etc. to build on this property that has always been an agricultural property. At any time after annexation is complete, they will be able to change their minds and install gas stations, huge hotel properties, another casino, etc. all of which will have a much larger impact on the environment than home sites. P321-01

Thank you,

Stefani Batastini
246 Kim Sue Ln
Buellton, CA 93427
805-680-5273 - mobile
stefani@thelarsoncompanies.com

Broussard, Chad <chad.broussard@bia.gov>

Oppose the EA prepared for Camp 4 annexation

1 message

krelliott@comcast.net <krelliott@comcast.net> Mon, Oct 7, 2013 at 11:02 AM
To: chad.broussard@bia.gov

Mr. Chad Broussard, Environmental Protection Specialist, BIA
With family living in the area of the proposed annexation, I greatly oppose the Camp 4 annexation. It seems like the Environmental Assessment is being rushed through without thoroughly examining the significant impacts to local residents. P322-01

The potential for turning this rural, bucolic area into a residential nightmare is overwhelming. Water usage in this area is already a grave concern for my family as rates have steadily increased. P322-02

Other concerns include, traffic, noise, access to schools and stores. I urge you and your committee to further examine this project and eliminate rash decisions. P322-03

Sincerely,
Kathyn Elliott
1360 Wildman Drive
San Jose, CA 95127-4434

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Comments on the NEPA Process and the Environmental Assessment prepared for the Camp 4 Annexation

1 message

Jen Solem <jellissolem@gmail.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Mon, Oct 7, 2013 at 11:30 AM

Subject: Comments on the NEPA Process and the Environmental Assessment Prepared for the Camp 4 Annexation

The purpose of the Environmental Assessment (EA) is to disclose potential impacts and determine if a Finding of No Significant Impact (FONSI) should be prepared or additional analysis should be conducted. After reviewing the proposed project and the EA, it is clear that an Environmental Impact Statement (EIS) is the appropriate NEPA documentation and process – NOT a Finding of No Significant Impact (FONSI) - for the reasons described in the comments below.

P323-01

1.

The project is controversial with many potentially significant impacts. Preparation of an EIS would provide a more robust and comprehensive analysis of potential impacts, a more transparent environmental review process, and more opportunities for public and agency involvement.

2.

The EA does not adequately cover all potential future development. It is reasonably foreseeable that future development could include:

P323-02

- A casino because the Chumash obtained two gaming permits and have only used one to date.
- A casino or other large revenue-generating development because such additional development would fulfill the economic opportunities the Chumash have stated would be provided to allow "the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises" (as stated on page 1-7).
- A banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative

spaces, a tribal office complex, a tribal community space including ceremony room and gymnasium (nearly 80,000 sf), and approximately 400 parking spaces would be provided for the facilities (as stated on page 2-14 of the EA).

The EA does not address the impacts of this potential future development. Thus, the potential impacts of the project have been underestimated in the EA and could be significant, particularly in terms of construction-related emissions, traffic, and noise; increased traffic, noise, and light from operation; increased demand for water supply and other services; and impacts on natural and biological resources.

P323-02 (Cont.)

3.

The issue of water supply and impacts on the groundwater aquifer has not been adequately addressed. The proposal states that the tribe would develop an onsite water supply system using groundwater to meet the increased demand for water. The EA does not provide adequate information on the impacts to the aquifer and to the existing and future water supply of others dependent on the aquifer.

P323-03

4.

Traffic impacts have not been adequately addressed. The project description states that existing access roads would be improved (it does not specify how) and new roads would be constructed. The EA does not adequately address the impacts of additional traffic that would result from Camp 4 development or other potential future development such as a casino.

P323-04

5.

Impacts to biological resources have not been adequately addressed. The analysis focuses on federally listed plant and wildlife species, critical habitat for these species, and migratory birds. It should also properly address impacts to state-listed and non-listed species and habitat, not dismiss them in Sec 3 Affected Env.

P323-05

6.

Impacts to cultural resources have not been adequately vetted with respect to Native American Heritage Commission (NAHC). The EIR (p 3-48) indicates the NAHC provided a list of individuals and groups for consultation, but it does not indicate if such consultation occurred.

P323-06

7.

Impacts to schools were determined negligible with no quantification because a majority of potential residents already reside in the area. The number of students generated from the residential development should be quantified, and the capacity of schools disclosed.

P323-07

8.

Noise impacts have not been adequately addressed. In Sec 4.1.10, it states that construction noise levels would fluctuate depending on the type, number, and duration of uses of various pieces

P323-08

of construction. This should be quantified with standard assumptions. Table 4-8 lists typical construction noise levels for different activities, but the analysis does not consider a worst case scenario with multiple activities and construction equipment in use at the same time. The nearest sensitive receptor is a residence located 200 feet from main area and 100 feet from haul routes. Potential impacts that are not properly disclosed, and no mitigation is proposed or required.

P323-08 (Cont.)

9.

Impacts to visual resources were determined less than significant because, as stated in Section 2.0, "Lighting would only occur at street intersections and residential areas. The lighting would consist of pole-mounted lights, limited to 18-feet tall, with cut-off lenses and down case illumination to the extent feasible". There would be no lighting at any of the non-residential facilities? There would be no exterior lights on structures (only pole-mounted lighting)? Lighting at proposed community facilities or at potential future development not addressed would surely include some exterior lighting that could create substantial night time light in the area.

P323-09

10.

The Land Use analysis should disclose consistency with the Santa Ynez Valley Community Plan. Although the plan is described in Sec 3.8.2, it is dismissed in Sec 4.1.8 because project parcels are exempt from County land use regulations (25 CFR Part 151 Trust Acquisition). For full disclosure, the EA should discuss the project's consistency with local plans, even if potential inconsistencies are found less than significant because of the exemption.

P323-10

11.

In Sec 4.5.2, it is stated that no significant, unmitigated impacts have been identified for Alternative A and B. I argue that the potential impacts need to be fully analyzed in an EIS before this conclusion can be reached for the reasons stated in this letter.

P323-11

12.

Cumulative traffic impacts were determined less than significant based on mitigation measures provided in Section 5.7. However, there is no assurance that the mitigation can be implemented nor is there a timeframe for when they would be implemented, because they are under the control of other agencies and required additional funding not yet secured. Due to this uncertainty, this impact should be determined significant and unavoidable.

P323-12

13.

Mitigation measures for several impacts are weak and do not include enough detail to ensure they will be implemented properly. Some examples:

a.

Sec 2 (p 2-10). It states that all identified wetland areas and California Live Oak would be avoided "to the maximum extent feasible". This is subjective and does not ensure appropriate mitigation, nor does the mitigation presented in Sec 5.

b.

P323-13

Sec 5.4. The mitigation only addresses the loss of oak trees. The mitigation is deferred, relying on a future arborist report to identify oak trees required for removal and require no net loss. The mitigation measure should specify replacement ratios. Additionally, there should be mitigation for other tree loss.

P323-13 (Cont.)

c.

Sec 5.4. The mitigation includes replacement of waters of the U.S at a 1:1 ratio, but does not specify if this ratio is acceptable to the USACE and does not indicate where the new wetlands could be located.

d.

Sec 5.5. The mitigation only recommends (not requires) that there be a stop work order if any prehistoric, historic or paleontological resources or human remains are found. With 16 cultural resources identified during an intensive field survey (4 archaeological sites, 9 isolated artifacts, 3 historic stock troughs), required mitigation measures should include qualified professionals monitoring construction and stop work orders if any potential resources are found (the recommended measures should be required).

P323-14

e.

Sec 5.7. The mitigation for traffic includes the tribe contributing its fair share to the funding of traffic improvements, which does not ensure that these improvements will be made because it is the responsibility of other agencies and it is not certain that adequate funding from other sources will be available. Because of the lack of uncertainty with this mitigation, this impact should be determined significant and unavoidable (triggering preparation of an EIS and EIR).

P323-15

14.

The EA does not include a discussion of the secondary impacts from mitigation measures, such as constructing new groundwater wells, a new wastewater treatment plant, creating a wetland mitigation site, and traffic/transportation improvements.

P323-16

15.

Any "mitigation measures" (i.e., protective measures, best management practices) presented in Section 2.0 as part of the proposed project should be included in Section 5.0, Mitigation Measures. All mitigation measures listed in Section 5.0 should be required (not recommended) and agreed upon by the BIA with signature.

P323-17

16.

Several permits and approvals from regulatory agencies will be required. Informal consultation and coordination with these agencies should be initiated during the environmental assessment process to obtain their input on impacts and mitigation measures. This will help ensure consistency with permit requirements. Agencies to consult include, but are not limited to: U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), State Historic Preservation Officer (SHPO), California Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), Caltrans, County of Santa Barbara.

P323-18

17.

A joint EIS/EIR should be prepared. Discretionary approvals by state and local public agencies require compliance with the California Environmental Quality Act (CEQA). The appropriate CEQA documentation for this project is clearly an environmental impact report (EIR). Both CEQA and NEPA encourage the preparation of joint documents for efficiency and consistency

P323-19

Thank you,

Jennifer Solem

2814 Stadium Drive

Solvang, Ca 93463

805-680-0968

Comment Letter P324

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P308.

Broussard, Chad <chad.broussard@bia.gov>

Comments on the Environmental Assessment Prepared for the Camp 4 Annexation in the Santa Ynez Valley

1 message

Brendan Crowley <bcrowley82@gmail.com> Mon, Oct 7, 2013 at 12:54 PM
To: chad.broussard@bia.gov

Mr. Broussard,

I am writing you to express my concerns over the recent Environmental Assessment study that was prepared for the Camp 4 Annexation in the Santa Ynez Valley. I do not feel that the issues regarding the water supply and impacts on the groundwater aquifer has been adequately addressed. The proposal states that the tribe would develop an onsite water supply system using groundwater to meet the increased demand for water, but the EA study does not provide adequate information on the impacts to the aquifer and to the water supply of others dependent on the aquifer. On a similar note, the study does not adequately cover the potential for any future large commercial developments that have been proposed by the tribe and the impact that such developments would have on the aquifer and surrounding environment. I would argue that these potential major impacts on our local resources require further study and documentation in the form of an Environmental Impact Statement. I greatly appreciate your time and consideration.

P325-01

P325-02

P325-03

Warmest Regards,

Brendan Crowley
961 Stadium Place
Solvang, CA 93463
bcrowley82@gmail.com

Broussard, Chad <chad.broussard@bia.gov>

Fw: Camp 4

1 message

Suzan <suzan4@verizon.net>
To: Chad.broussard@bia.gov

Mon, Oct 7, 2013 at 1:24 PM

From: Suzan
Sent: Monday, October 07, 2013 12:12 PM
To: Suzan
Subject: Camp 4

Please Help Us Continue to soar above the open fields of Camp 4.....

thank you

The Hawks and Wildlife of Santa Ynez Valley.....

P326-01

Suzan Hamilton-Todd Studio
1721 Laurel Avenue
Solvang, California 93463
805.350.3164

SHamilton-Todd_looking ahead.jpg
2281K

Broussard, Chad <chad.broussard@bia.gov>

(no subject)

1 message

Charles Jackson <jackson4cj@gmail.com> Mon, Oct 7, 2013 at 2:50 PM
To: Chad.broussard@bia.gov

Dear Mr. Broussard,,

Last Friday I sent to you a copy of the Environmental Assessment Comments for the Santa Ynez Band of Chumash Indians for the Camp 4 Property in Santa Ynez, California, for the Santa Ynez Valley Concerned Citizens. Inadvertently a footnote was removed from the document. I have attached a corrected version of the document to include the omitted footnote. I am aware that the deadline for receipt is today October 7, 2013. A hard copy is to follow of this corrected version. A hard copy of the previous letter was sent via certified mail on Friday October 4, 2013. Due to the Government shutdown I am not aware of whether or not your office is presently receiving correspondence either by delivery or electronically. Are you open presently and receiving e-mail and regular Mail?

P327-01

Santa Ynez Valley Concerned Citizens

Corrected SYVCC Comments on Chumash EA0001.pdf
1100K

Santa Ynez Valley Concerned Citizens

October 4, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA. 95825

RE: Comment on Environmental Assessment (EA) of Proposed Trust Acquisition of Five Parcels known as the Camp 4 Property

Dear Regional Director Dutschke,

The following comments are submitted on behalf of *The Santa Ynez Valley Concerned Citizens*. First, thank you for your willingness to extend the comment deadline to October 7, 2013, in response to the County of Santa Barbara's letter requesting an extension. Clearly the size and scope of this proposed fee to trust acquisition combined with California's first ever approved Tribal Consolidation Area is significant and warranted an extension.

SYVCC reserves the right to submit additional comments on the proposed trust acquisition. Founded in 2000, the mission of the Santa Ynez Valley Concerned Citizens is to inform, mobilize and articulate the concerns of the 22,000+ citizens of the greater Santa Ynez Valley on issues of land use, private property and stewardship of community resources. Where appropriate, we promote constructive dialogue on issues of civic concern and request accountability from governmental entities and officials.

Santa Barbara County and particularly the Santa Ynez Valley possess a rich legacy of involvement and commitment to sound land use policies that allow us to live within locally available resources, preserve rural character, improve and maintains existing infrastructure, protect agriculture, encourage and creates permanent open spaces, protect the visual landscape and respect the unique visual and cultural characteristics that make up the distinctive nature and appeal of our communities. It is with these elements in mind that an exhaustive, rigorously researched and analyzed, Community Plan born of active public involvement, sacrifice, negotiation, energy, and expense was drafted, vetted approved and embraced by the citizens of the Santa Ynez Valley.

The residents of the Santa Ynez Valley and indeed of Santa Barbara County as a whole expect and demand rigorous, objective, unbiased, transparent and above all else thorough analysis and evaluation of significant land use decisions irrespective of jurisdiction. In addition, any contemplated Fee-to-Trust analysis must have a thorough evaluation of the cost shifting that occurs when fee land is taken into trust. The loss of property taxes can and does have a significant impact on the ability of local government to provide social and emergency services to the surrounding community. The loss of property tax affects local school district budgets further affecting the quality of education. The loss of jurisdictional authority affects a local government's ability to control the equitable sharing of the regions natural resources which include water, waste water disposal, traffic circulation, law enforcement and emergency services, management of urban sprawl, night sky conservation, pollution, mosquito abatement, conservation of agricultural resources as well as compatible land uses.

P327-01
Cont.

P.O. Box 244, Santa Ynez, CA 93460
www.syvconcernedcitizens.com
A 501(c)(4) Nonprofit Organization

As you are probably aware, the property in question for the above referenced Environmental Assessment involve 1400 acres of agricultural land within the state's Williamson Act agricultural preserve and within the AG-100 zone designation within the Santa Ynez Valley Community Plan. The property has been in continuous agriculture for well over 100 years and represents a visual gateway to the communities of the Santa Ynez Valley. In 2003, with much fanfare, the Tribe announced plans in partnership with then owner Fess Parker, to develop 756 acres or roughly half of the property with two (2) golf courses, a 300 unit Resort Hotel Complex, 250 Market rate homes and related elements also by taking the property into trust. At that time the proposed development would have purportedly earned the Chumash a coveted 5th diamond ranking for its resort operations. Since 2000, the Chumash have purchased additional parcels proximate to their original reservation, all in varying stages of pending application for fee-to-trust. At present, the tribal ownership represents the largest percentage ownership of undeveloped commercially zoned property in the township of Santa Ynez and this is in addition to the sizeable holdings some 3 miles away from the Tribe's reservation.

P327-02

We are aware that the purposes of an Environmental Assessment are the following:

a. Provide evidence an analysis sufficient to determine an EIS is required
b. Aid a federal agency's compliance with NEPA when no EIS is required and
c. Facilitate preparation of an EIS when one is necessary. (40 C.F.R. 1508.9 (a)

P327-03

The citizens of the Santa Ynez Valley need look no further than the significant off-reservation impacts posed by the Santa Ynez Band's intensive casino development and the extent of recent real property purchases to recognize that the proposed fee-to-Trust of Camp 4 and the concomitant additional burdens posed by the Tribal consolidation Area has the potential to significantly affect the quality of the human environment including direct, indirect, and cumulative effects. As"The EA presented for the Camp 4 Fee-to-trust application has fulfilled virtually none of the requirements and yet concludes that no significant effects will result from approval of the FTT application it is our strong conviction that this EA be withdrawn and re-drafted in a manner adequate under the CEQ/NEPA regulations reaching the obvious conclusion that an EIS is both warranted and necessary. The following fundamental flaws significantly defeat the credibility of the document and mitigate in favor of a complete re-analysis:

1. The standard of review for this Fee-to-Trust (FTT) application is inconsistent with the FTT notice and the verbal responses of BIA personal.

2. The existing application is for housing and economic development, yet applies the less rigorous standard of review for applications that are solely for housing.

P327-04

3. The Tribe's justification for the FTT based upon a need for tribal housing is unsubstantiated, not legitimately analyzed in the EA in terms of the full effect and meaningful use of the existing reservation are for redevelopment is summarily dismissed.

4. The EA does not include the more rigorous evaluation required for non-housing uses proposed by the Tribe.

5 The Tribe can meet its goals by seeking entitlements through the County of Santa Barbara and does not need to take the land Fee-to-Trust in order to meet the stated goals.

6. The EA conducts a very superficial analysis of cultural Resources, which for off-reservation FTT are one of the significant factors weighed in determining whether there is a historical connection to the property which is the subject of the FTT.

7 The EA failed to analyze the cumulative impacts associated with potential development on the 11,500 acres within the BIA approved Tribal Consolidation and Acquisition Area, nor was a separate NPA review made of the Tribal Consolidation Area undertaken prior to inclusion in the FTT." A1

8 We are concerned about the independence of the Environmental Consultant and the seeming abdication of critical oversight by the Lead Agency.

P327-04 Cont.

The following elements contained herein support and address the above conclusions and contribute to our overall finding that the Environmental Assessment provided for the Camp 4 FTT is both inaccurate and inadequate, and that a Full Environmental Survey is necessary before consideration of this FTT request is initiated.

I. Tribal Consolidation Plan (TCA)

Section M of the EA includes the Tribal Consolidation Plan. This Plan was approved June 17, 2013 by the Pacific Regional Office of the BIA without notice to the private property owners or affected local governments. ***The TCA administratively creates what amounts to a claim of aboriginal lands or restored lands for the Tribe. Therefore, in order to appropriately evaluate the Fee to Trust Acquisition we must evaluate the TCA.*** While there is no statutory or regulatory criteria upon which to develop a TCA based on the acquisition of new lands, there is specific regulatory authority to acquire land that is outside of a reservation boundary. The Chumash reservation is approximately 1.6 miles from the Camp 4 property. ***These parcels do not share a boundary with the established reservation land and therefore must be reviewed under 151.11 on Off Reservation Acquisition.***

The EA appears to request the land as retribution to be ***"banked"*** for use for future generations. The Tribe identifies the need for this retribution as the failure of the federal government to grant title to their claim on lands in 1851. The Tribe further asserts it was the intent of the Catholic Church and Mexican and or Spanish Government to give these lands to the Tribe. The very presence of this language in the EA and the TCA appears intended to sidetrack decision makers from the merits of the fee to trust transaction before them.

P327-05

The TCA is currently being challenged by the County of Santa Barbara, SYVCC, Meadowlark Ranches Association and the Santa Ynez Valley Association of Realtors before the Interior Board of Indian Affairs (IBIA). Therefore, for the purposes of preserving the arguments made in the Statement of Reasons by the County of the Santa Barbara, SYVCC, Meadowlark Ranches Association and the Santa Ynez Valley Association of Realtors, ***SYVCC "adopts and incorporates" the Statement of Reasons for Appeal in the June 17, 2013 Decision by Pacific Regional Director to approve Land Consolidation and Acquisition Plan of the Santa Ynez Band of Chumash Indians submitted by all parties to the IBIA.***

The "concept" of the TCA is based solely on an IBIA ruling, *Absentee Shawnee Tribe v. Anadarko Area Director*, Bureau of Indian Affairs, 18 IBIA 156 (02/20/1990). This ruling has no statutory or regulatory law to support its conclusion. Administrative Judge Vogt in the *Absentee Shawnee Tribe v. Anadarko Area Director* reversed and remanded the prior negative decisions stating:

"The Board finds that, *in the absence of statutory or regulatory criteria*, appellee had the discretionary authority to analyze appellant's plan under *reasonable criteria of his own devising*.

Appellee's initial analysis which took into account *such factors as the geographic extent of proposed consolidation area vis-a-vis the tribes need for additional* and the BIA's ability to provide services to the land, appears to be ***reasonably related to the ultimate development of a realistic and manageable land for the trust acquisition of additional land for the tribe.*** *(Emphasis added)*

This ruling without statutory or regulatory criteria permits this *specific* Regional Director in this *specific* instance to create reasonable criteria of his/her own devising. Judge Vogt suggests the following are reasonable criteria:

(a) The extent of the geographic area,
(b) Ultimate plans for development of a trust land, and
(c) The tribes need for additional lands.

However, it is extremely questionable if Regional Director Amy Dutschke used or considered the suggestions of Judge Vogt, in devising her own ***"reasonable criteria"***. It appears, Regional Director Dutschke provides no criteria for her approval at all! Let's consider the approved TCA under Judge Vogt's suggested criteria:

(a) Extent of geographic area – suggested by Judge Vogt

The approved TCA encompasses approximately 11,500 ac of private property that has been under the control of the State of California and the County of Santa Barbara for 163 years. It has been in the private ownership of individual citizens for as many years. The Chumash Mission Indians of Santa Ynez (Tribe/Chumash) are asserting a claim of aboriginal lands through an administrative process. The history provided by the tribe in the proposed TCA Plan evidently was not verified or questioned. While the Tribe mentions the 1851 Act, the Tribe fails to provide the evidence submitted to the Commission for validation of their Spanish or Mexican Claim on the land. In the end, whatever evidence was submitted to the 1851 Commission was insufficient as the claim of title was rejected.

P327-05
Cont.

The assertion that the Spanish or the Mexican Government were intending to give the Mission lands back to the Indians raises many questions. History is clear that the actions of the Spanish and Mexican Governments were as Imperialistic nations assimilating populations on newly conquered lands.2 When Spain or Mexico created colonies they did not recognize the existing governance but rather assimilated the populations under their authority, jurisdiction and governance. Recognition of Chumash Governance did not come till many years later under the superintendence of the United States government.

The Chumash fail to inform decision makers that the 1851 Act eliminated adverse claims on all California Titles. Even the adverse claims of Indians or quasi sovereigns were rejected making clear ***there are no aboriginal land claims in California***. As a matter of federal law, it seems a very difficult task for the Pacific Regional Director to create reasonable and lawful criteria to develop a TCA ***anywhere*** in California. To do so, and take land into trust under the current guidelines established in this EA wrapped up in the TCA creates ***irreparable harm***, clearly a standard that is ripe for a Temporary Restraining Order or Injunction.

To refresh the memory of decision makers, the Mexican War concluded in 1848. Mexico ceded to the United States what is now the southwestern United States, including all of the present day State of California. (*Treaty of Peace, Friendship, Limits and Settlement, U.S. –Mex., May 30, 1948, 9 Stat. 922, T. T.S. No. 207 (1850)*. There is a general belief in Indian Country that the Mexican government betrayed Indians by not including their lands to be set aside for tribes in this treaty.

Shortly thereafter, Congress enacted a statue to settle land claims in the newly acquired territory. (Act of March 3, 1851, ch.41,9 Stat. 631). The 1851 Act created a Board of Commissioners to determine the validity of all claims, and it required every person including Indians ***"claiming lands in California by virtue of any right to title derived from the Spanish or Mexican government"*** to present the claim within two years. Any land not claimed within two years, and any land for which a claim was finally rejected was to be deemed "part of the public domain of the United States." (1851 Act 13, 9 Stat. at 633. *See - United States v. California*, 436 U.S. 32, 34 n.3 (1978). The Chumash and the BIA have missed the deadline for a land claim by 160 years. ***Development of the TCA is an abuse of the Regional Directors authority. The decision is arbitrary and capricious and based on erroneous facts.***

(b) Ultimate plans for development of a trust land suggested by Judge Vogt

The Tribe has only stated that they will build 143 homes, supporting utilities and maintain the existing grape orchard. There is significant acreage, more than half of the remaining 1433 acres for which ***"no ultimate plans"*** are describe. Instead, the Tribe has stated they are land banking for future needs of the Tribe. The concept of land banking for future undetermined needs was not foreseen in 1934 at the enactment of the Indian Reorganization Act.

P327-05
Cont.

While the Chumash have stated that this is a non-gaming application, there is strong likelihood that the intended use of the land will change. In fact, there is significant information that the Tribe wants to use the land for something other than 143 homes. In 2003, the Chumash proposed housing and "a casino/hotel complex development" on this same land.3 It would appear now, the Tribe is attempting to piece-meal the ***ultimate development plans*** for this property. Further, there is no statement in the draft Cooperative Agreement offered by the Chumash to promise not to construct a casino/hotel or other commercial development on this property. ***The EA and TCA together send a strong message that the tribe wants to get the land safely in trust and change the intended use at some future date.***

While the concerns of the local government and the surrounding community of citizens may be considered speculative, the BIA must recall the recent actions of the Tule River Indian Tribe of Tulare County. The Tule River Indian Tribe and the BIA asserted the concerns expressed by local government and community members about future casino development were speculative. In 2011, the Tule River Indian Tribe submitted an application for 40 acres off reservation in the City of Porterville. The Tribe stated it was a non-gaming application. As evidenced in the County and State brief before the IBIA, the Tribe's intent was to use the land for gaming. As a result, the Tule River Indian Tribe withdrew its application. This is just the most recent example of a ***bait and switch*** transaction.

(c) The tribes need for additional lands suggested by Judge Vogt

In the *Absentee Shawnee Tribe v. Anadarko Area Director* the Tribe presented factors of high tribal unemployment rate, low educational level, substandard housing, low standard of living and high disease rate and its own inability to generate additional income from existing tribal lands to assist its people' economic development. The ***purpose and need*** of the Absentee Shawnee Tribe was to gain

additional lands in order to increase the tribal land base and gain access to new economic markets within Oklahoma.

The Chumash *"Purpose and Need"* as stated in the EA, pales in comparison to that reviewed before Judge Vogt. The Chumash state, "the purpose and need is for Consolidation and Acquisition Plan by providing housing within the Tribal Consolidation Area to accommodate the Tribe's current members and anticipated growth". In the Chumash Application, the Tribe further states it wants the land in trust in order to remove the authority and jurisdiction of the County and the State.

The Chumash are truly a remarkable success story. A story that became a reality due to the business oriented leadership of the Tribal Council and the Tribe's good fortune to be located in the Santa Ynez Valley. The Tribe's casino market area is free of competition from Los Angeles to Fresno County. A monthly stipend to members has been reported to be as high as $500,000.00 per enrolled tribal member per year. The enrolled members (approximately 136)4 have the means to purchase substantial housing anywhere in the United States or abroad. Tribal members have the ability to provide for private schools and advanced college educations for their children and future generations without tribal government assistance.

The Chumash exemplify the intended success of California's Proposition 1A passed in 2000 to provide a monopoly on casino style gaming that would generate revenue for tribal governments and raise the standard of living for all tribal members. The Tribe has purchased a number of other properties in the Santa Ynez Area and is a successful business model.

P327-05
Cont.

The Chumash have been and continue to be exceedingly influential in the State political system. The modern Chumash Tribe is not a victim of governmental policy nor is the voice of the Tribe discounted in local, state or federal policy actions.

II. Purpose and Need

The proposed trust acquisition encompasses 1,433 acres located east of Route 154 and north of Armour Ranch Road within a (TCA) in an unincorporated area of Santa Barbara County. Section 2.1 of the EA specially states that there is no other land comparable for a fee to trust acquisition within the TCA. Moreover, lands outside of the TCA would not meet the purpose and needs of the proposed action that is within the TCA. The stated *need and purpose* of this land acquisition is that lands outside of the TCA would constitute an Off Reservation acquisition. Using the federal regulations for Off Reservation acquisition creates a higher standard of review and provides for greater weight in the decision process to affected government. It would appear the Chumash *purpose and need* is to circumvent greater scrutiny of the fee to trust acquisition.5

The Tribe and the BIA are asserting that lands within the TCA approved on June 17, 2013, are to be considered an ***On Reservation*** acquisition. The Chumash reservation is approximately 1.6 miles from the Camp 4 property. These parcels do not share a boundary with the established reservation land and therefore must be reviewed under 151.11. ***There is no statutory or regulatory law that supports this is to be an On Reservation Acquisition.***

III. Deficiency of Alternatives

The EA states it has been prepared, "...to comply with the National Environmental Policy Act, 40 USC §4332, and further defined in 40 CFR §§ 1510.10-218." Specifically, the EA does not include a reasonable range of project alternatives, it does not provide an adequate level of analysis of potential effects the proposed action may have on the physical or human environment, and it fails to consider the indirect and cumulative impacts of the Tribe's proposed action. As such, the EA does not provide the Tribe/BIA an adequate assessment of the potential effects that may result from the construction and operation of the proposed project. P327-06

- The EA fails to state the ***"ultimate total development"*** of the land. P327-07

- The EA fails to consider land outside of the TCA as that would be considered an off reservation acquisition. The EA states the Tribe has an approved Tribal Consolidation Area over approximately 11,500 acres within the TCA, yet the project site is the only site where the proposed project (and only the proposed project) will satisfy the objectives of the Tribe. ***The EA does not include sufficient evidence to support this conclusion.*** P327-08

- The EA does not address the concerns that the project is contrary to the current zoning and general plan of the community. The recent ruling by the United States Supreme Court in Patchak, made clear that the Indian Reorganization Act is a ***land use statute.*** P327-09

- The EA does not address the full impact of the proposed action to the Agricultural Preserve of the Santa Ynez Valley. P327-10

IV After Acquired Lands and Impacts on Santa Ynez Valley

The Tribe further states that this is a non-gaming application, We disagree. This application must be considered and processed as gaming because the land is identified as within the recently approved TCA which determines that the land must be processed as an On Reservation transaction. The Tribes 1999 Tribal State Compact permits this tribe to have ***two*** casinos. The "California Fee to Trust Consortium" (Consortium) of which the Tribe is a member since its inception repeatedly fails to recognize gaming applications and process them accordingly. P327-11

The development of the TCA and the proposed fee to trust affects landowners ***within and without*** the boundaries of the TCA. The Tribe in its purchase of the 1,433 acres through the open market has regained control over the development of these parcels, however transferring this land from fee to trust grants the tribe governmental control over these lands. This creates a disruptive and practical consequence to the surrounding areas which are populated by non-Indians. Transferring these lands into trust creates a mix of state and tribal jurisdictions which burden the administration of state and local government and adversely affect landowners P327-12

neighboring the tribal lands. Land will be removed from the tax rolls significantly affecting the future economies of the area. This acquisition is a major federal action. Moreover, because the land has the potential to meet an exception under Section 20 of IGRA, *SFVCC* repeats, this proposed transaction requires a full Environmental Impact Statement (EIS). P327-13 P327-14

IV. Unaddressed Impacts

One of the Purposes of the National Environmental Policy Act (NEPA) is to provide a full and fair review of all adverse environmental impacts as well as listing all affected stakeholders. The EA submitted for the Camp 4 fee to trust acquisition does not meet this standard. The size and scope of the proposed fee to trust acquisition of 1433 acres raises substantial questions suggesting that project may have a significant environmental effect.

- These impacts must be judged against their local and regional context (40 CFR Sec. 1508.27 (a)) and an EIS prepared if either the impacts or the project itself is likely to be highly controversial. This proposed fee to trust has hit the pages of the Los Angeles Times beginning in 2005. It has been the topic of numerous news stories in state and nationally as well as many letters to the editor of local papers. It has been the subject of oversight hearings by the House Resources Sub-committee on American Indian and Alaskan Native Affairs. ***This is a controversial proposal.***

- The proposed project does not describe the full use of the 1433 acres of land. An EIS is similarly required where the extent of impacts is "highly uncertain or involves unique or unknown risks." 40 CFR sec. 1508.27 (b)(5).

- The BIA must initiate a full EIS.

P327-14 Cont.

Ground Water:

Water throughout California is a scarce resource that must be properly managed. The EA discusses the Tribes use, but not a management plan that encompasses the off trust lands community. The acquisition of the 1433 ac. means a loss of local control of the aquifer to the entire valley. Major decisions regarding water usage will no longer be made by local people with locally-valued decision about the impacts and use. The water use projected by the 5-acre homes is 50-100% less than that actually used by the contiguous 5- acre neighborhood.

Local water companies do not necessarily own the land that infrastructure (wells, reservoirs, pumping stations, etc.) is located on. "Easements and or leased land" supports the use of these properties for infrastructure. It is not clear if the encumbrances (easements, agreements, and leases) will survive if the 1,433 acres are taken into trust. Local water companies and the many private residences to which they provide service may potentially lose their water source. (*See* – Comment on Easements)

P327-15

Easements:

The Secretary of the Interior must ensure and stipulate in any final decision that easements remain enforce on the trust parcels. Regional Directory Dutschke must require the elimination of all liens, encumbrances or infirmities prior to taking final approval action on this fee to trust acquisition. Transferring this land into trust without directly contacting easement owners represents a ***"taking or inverse condemnation"*** without due process or just compensation. Additionally, loss of access to private properties would devalue and make them unmarketable.

P327-16

Biological Resources:

While the EA provides general information and maps regarding biological resources it fails to analyze how the project impacts the surrounding regional area. A complete analysis of the potential biological impacts of the project is fully dependent upon an adequate and thorough survey and the significance of the potential impacts cannot be determined until surveys of impacts to the surrounding area are complete.

P327-17

Air Emissions:

Appendix B - provides rows and columns of numbers but this section fails to identify how this project conforms to Regional Air Quality Strategy for Santa Barbara County. Analysis to demonstrate conformance must be included. No consideration is given to SB32 Green House gas Emissions strategy for the County will be impacted

P327-18

Cumulative Impacts:

The cumulative impacts analysis should include off-Reservation projects. The EA must consider the cumulative impacts on traffic and groundwater resources, and a thorough analysis must include all projects that contribute.

P327-19

Drainage and Water Quality:

The EA must include an inventory of the possible contaminants that may be generated on-site during the construction and operation of the proposed uses; and the direct and cumulative impact to existing water quality in the region. The EA must also provide information on how the proposed action will affect the beneficial uses of the region's water supply.

P327-20

Transportation and Circulation:

Appendix I - The EA collected existing traffic volumes in March of 2012 for the roadway segments and intersections. The EA does not address the increase tourism traffic that exists during the summer months. The traffic *analysis* as in all reports by AES, is insufficient.

P327-21

Chumash Proposed Cooperative Agreement (CA): Enforceable Agreement between the Tribe and County of Santa Barbara:

The Chumash have offered a Cooperative Agreement (CA) to the County of Santa Barbara for 10 years. The proposed CA will pay one million dollars per year limited to10 years in exchange for the County to support their fee to trust project. However, the 1,433 acres if and when transferred into trust will be taken off of the tax rolls into perpetuity. The CA does not include any additional impacts to the County after year 10.

The proposed CA does not address necessary mitigations or services paid for at the expense of all County taxpayers. The CA does not offer mitigation funds for increased needs of services for law enforcement, fire or emergency services, nor does it offer in lieu of taxes for the property or for improvements to the property. Rather, the CA submitted to the County promises ***"NO NEW REVENUES"***.

The payment in lieu of taxes in section III that is left blank comes to the tribe from federal and state sources, including the current Indian Gaming Special Distribution Fund (SDF). The California Court has ruled that SDF funds may ***only be used for gaming related impacts.*** Is this term in the CA *evidence* that the Tribe intends to use the 1,433 ac. of land for gaming in the future after it is safely in trust? The current SDF funds are inadequate to reimburse county tax payers for the costs of law

P327-22

enforcement, fire and emergency services generated by the Chumash casino development. How could these funds even be considered to offset future impacts?

The CA does not offer monitoring of shared groundwater aquifers, establish threshold of water level declines or ensure that significant declines in groundwater levels do not extend off of the trust lands. It does not offer cooperation or mitigation measures that include a reduction or cessation in on site pumping until water levels in the monitoring wells rise above the thresholds. The CA does not offer an environmental assessment should future developments or land use changes occur. ***Terms such as these are critical in any agreement when land is taken out of the regulatory authority of the state and local government.***

The CA while providing a "Waiver" (Section 12) to the terms of the agreement fails to include the necessary language for a judicially enforceable waiver. The CA describes but does not provide access to a fair and transparent solution for resolution to disputes in California District Court in Santa Barbara. The "Waiver language contained in this document" is nothing more than an unenforceable promise.6 This CA may be a good beginning for a negotiation, but commitment and execution is far from complete. ***The CA may require the signature of the Secretary of the Interior in accordance with Part 81.***

P327-22 Cont.

Any CA negotiated between a Tribe and a County outside of a tribal state compact requires the County to comply with the California Quality Environmental Act. The County cannot sign an agreement which contains provisions legally binding it to several definite courses of action that involve physical changes to the environment. The County will be required to perform a full EIS in order to enter into a CA with the Tribe. The terms and conditions of such an agreement must be voted on in an open public forum and subject to legal challenge. ***The Tribe must remember these issues are multi-jurisdictional and not just tribal.***

VI. Conclusion

Santa Ynez Valley Concerned Citizens demands that the BIA immediately require a full EIS to be prepared for recirculation and review of this proposed fee to trust acquisition under the proper regulation of CFR 151.11, Off Reservation Acquisition. Further, we strongly suggest the BIA and the Tribe withdraw the TCA.

P327-23

P327-24

Greg Simon, Chairman
Santa Ynez Valley Concerned Citizens

FOOTNOTES:

A1. Comments on Chumash Environmental Assessment for Camp 4 FTT (letter)by M. Andriette Culbertson 9/27/13, adopted and incorporated by reference as set forth herein.

1 ***"Land banking"*** is the acquisition of land by tribes for some future undisclosed use. This action circumvents the intent of federal regulations intended to address serious and critical taxation and jurisdictional issues.

2 **The Spanish missions in California** comprise a series of religious and military outposts established by Spanish Catholics of the Franciscan Order between 1769 and 1833 to spread the Christian faith among the local Native Americans. **The missions represented the first major effort by Europeans to colonize the Pacific Coast region,** and gave Spain a valuable toehold in the frontier land. The settlers introduced European livestock, fruits, vegetables, cattle, horses and ranching into the California region;
however, **the Spanish colonization of California** also brought with it serious negative consequences to the Native American populations with whom the missionaries came in contact. The government of Mexico shut down the missions in the 1830s. **In the end, the mission had mixed results in its objective to convert, educate, and "civilize" the indigenous population and transforming the natives into Spanish colonial citizens.**

3 The Tribe's 1999 tribal state compact in section 4.2 provides for two casinos

4 Tribal Application at page 9 of 16
5 The Chumash have been members of the California Fee to Trust Consortium whose goal since 1998 has been to streamline the fee to trust process. In this instance, does "streamline" mean to circumvent a more stringent regulatory process that is required?

6 Federal Indian law drastically affects and changes any contractual agreement. Tribal Governments must pass a resolution to bind it to a contractual agreement. Further when a tribe waives its sovereignty certain criteria must appear in the resolution to ensure it is in effect and operational; (1) The Resolution must agree to address matters arising under the terms of the contract in order to judicially waive the Tribes immunity to civil liability. (2) The Resolution must be adopted in a manner consistent with the Tribes Constitution. If the Tribe Constitution does not address waivers of immunity and some do not, then it will require a vote of the entire tribal membership, in order to waive the tribes immunity to civil liability, (3) The Resolution must identify who is to sign the agreement or authorize the entire Council to sign the Agreement and (4) If the Contract exceeds seven years and limits a tribal government's authority over the use of the land or impairs the title to the land, it then requires a review under USC Section 81 by the Secretary of the Interior. This may require the signature of the Secretary of the Interior. (25 CFR Part 84)

Comment Letter P328

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

Environmental Assessment for the Santa Ynez Band of Chumash Indians

1 message

Moore, Lyn <LMoore@bhfs.com>
To: "chad.broussard@bia.gov" <chad.broussard@bia.gov>

Mon, Oct 7, 2013 at 3:40 PM

Dear Mr. Broussard:

Please find attached correspondence (letter and exhibits) addressed to Ms. Amy Dutschke from Ms. Susan Petrovich. P328-01

Please confirm receipt of this email and letter.

Thank you.

Lyn

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3715K

Brownstein Hyatt
Farber Schreck

October 7, 2013

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VIA E-MAIL CHAD.BROUSSARD@BIA.GOV

Ms. Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Region Office
2800 Cottage Way
Sacramento, CA 95825

RE: Environmental Assessment for the Santa Ynez Band of Chumash Indians Camp 4 Fee to Trust Acquisition Project (Camp 4)

Dear Ms. Amy Dutschke:

Brownstein Hyatt Farber Schreck represents Charles Grimm, who owns two (2) parcels, each exceeding 100 acres in size, in what is commonly known as Santa Barbara Thoroughbred Farms. Mr. Grimm's property lies wholly within the newly described Tribal Consolidation Area (TCA) referenced in the EA and is located a short distance southeast of the Camp 4 parcels (Parcels). Mr. Grimm's southern property boundary is the Santa Ynez River.

P328-01 Cont.

The EA arises from the Santa Ynez Band of Chumash Indians (Tribe) request that BIA take the Parcels owned by the Tribe into trust (Proposed Action). The Parcels encompass a total of 1,433 acres located east of State Route 154 and north of Armour Ranch Road within the so-called "Tribal Consolidation Area" in the unincorporated area of Santa Barbara County (Parcels). The Parcels are not contiguous to (or even proximate to), nor do they lie within, the exterior boundaries of the Tribe's existing reservation. The Parcels are either adjacent to or proximate to all of the parcels within Santa Barbara Thoroughbred Farms, thirty (30) parcels comprising approximately 3100 acres of land, all which historically has been held and improved by individual parcel owners, not by the Tribe or its members. All parcels within Santa Barbara Thoroughbred Farms are owned by private property owners, none of whom are members of the Tribe or lineal descendants of tribal members. The Santa Barbara Thoroughbred Farms, as well as thousands of additional acres of privately-held, non-Tribe owned (and non-tribal member owned) land have been included in the TCA with neither the knowledge nor the consent of the private property owners.

P328-02

The Alternatives evaluated in detail in the EA consist of:

Alternative A – 1,433± acre (1,411.1 acres plus rights of way) trust land acquisition within a Tribal Consolidation Area and assignment of 143 five-acre residential lots for tribal members. The residential lot assignments and access roadways would cover approximately 793 acres of the project site. The project site would include 300 acres of vineyards (256 existing acres with 44 acres dedicated for expansion), 206 acres of open space/recreational, 98 acres of riparian corridor and 33 acres of oak woodland conservation, and 3 acres of Special Purpose Zone- Utilities; and,

Alternative B – Identical trust land acquisition and development of 143 one-acre residential lots for tribal members. The residential lot assignments and access roadways would cover approximately 194 acres of the project site. The project site would include 775 acres of open space/recreational, 30 acres of tribal community facilities (including 80,000 square feet of tribal facilities), and the same acreages of vineyard, riparian corridor and oak woodland conservation, and utilities land uses as proposed under Alternative A; and,

Alternative C (No Action Alternative) – No federal action or proposed development would occur at Camp 4.

P328-02 Cont.

I. INTRODUCTION

We contend that, for the reasons stated below, the proposed project is contrary to law. The Secretary of the Interior lacks the legal authority to place the Parcels into trust because the Tribe was not under federal jurisdiction in June 1934. *See Carcieri v. Salazar*, 555 U.S. 379, 129 S.Ct. 1058 (2009) (holding that Secretary lacks the authority to place lands into trust for tribes not under federal jurisdiction by 1934). Mr. Grimm has standing to assert the lack of authority based upon the recently decided case, *MATCH-E-BE-NASH-SHE-WISH Band of Pottawatomi Indians v. Patchak (2012) 132 S.Ct. 2199*, because he is a neighboring property owner whose land and life will be directly impacted by the significant change in land use – from rural agricultural to suburban residential, plus "events" – proposed by the Tribe. Even if the Tribe actually implements the project described in the EA and doesn't make significant changes to the project once the land is held in trust, this project will have significant environmental impacts upon the Parcels and upon the neighboring lands, including the property owned by Mr. Grimm.

P328-03

All environmental review associated with the proposed action is contrary to law and must terminate because there is no lawful action to be taken.

In the event that the environmental review proceeds despite this fatal legal flaw, the following defects in the EA must be addressed: (1) the EA applies the wrong standard of review; (2) the EA is based upon the improperly adopted and therefore illegal

P328-04

Tribal Consolidation and Acquisition Plan (TCAP), approved by BIA in violation of both the requirements of its own regulations and the requirements of the Indian Land Consolidation Act; and (3) the EA violates the National Environmental Policy Act (NEPA) by failing to properly consider the cumulative impacts of the project.

P328-04 Cont.

II. THE SECRETARY LACKS LEGAL AUTHORITY TO PLACE THE PARCELS INTO TRUST

The Proposed Action is based upon the flawed notion that the Secretary of the Interior has the legal authority to place the Parcels into trust status under 25 U.S.C. § 465[1], a provision of the Indian Reorganization Act (IRA). The United States Supreme Court has held, however, that the Secretary does not have the authority to take lands into trust for tribes that were not under federal jurisdiction in June 1934, the date of the enactment of the IRA. *See Carcieri v. Salazar,* 555 U.S. 379, 129 S.Ct. 1058 (2009).

The Tribe was not under federal jurisdiction until 1963. To our knowledge, it was first organized as a tribe when its members adopted the Articles of Organization on November 17, 1963. The Secretary of Interior approved the Articles of Organization on August 23, 1963 and later approved the Articles as a Constitution in 1964.

P328-05

The Tribe clearly was not under federal jurisdiction in 1934, and the Secretary of the Interior has no legal authority to place the Parcels into trust on behalf of the Tribe. *See Carcieri,* 555 U.S. 379, 129 S.Ct. 1058. Any environmental review – specifically, the pending EA – associated with the Proposed Action should cease because the underlying proposed federal action – the taking of lands into trust for the Tribe – is unlawful and cannot be completed.

III. BIA IMPROPERLY RELIED ON THE TCAP IN CONDUCTING ITS EA

On March 27,2013, the Tribe submitted a Proposed TCAP to BIA for approval. The TCAP identified the lands shown in Figure 1-2 in the EA as the Tribal Consolidation Area. (A copy of the Tribal Consolidation Plan is attached to the EA as Appendix M and is incorporated by reference in this letter.) According to the Tribe, the purpose of the Plan is to "assist the Tribe in acquiring additional lands in order to increase the tribal land base and provide sufficient land for housing, economic development and governmental

P328-06

[1] 25 U.S.C. § 465 provides:

> The Secretary of the Interior is authorized, in his discretion, to acquire, through purchase, relinquishment, gift, exchange, or assignment, any interest in lands, water rights, or surface rights to lands, within or without existing reservations, including trust or otherwise restricted allotments, whether the allottee be living or deceased, for the purpose of providing land for Indians.

purposes." P. 2. The TCAP includes the "geographical area . . . encompassing approximately 11,500 acres of the College Ranch" (Tribal Consolidation Area).[2]

On June 17, 2013, without giving the notice required by its own regulations and without conducting the environmental analysis required by NEPA, the Regional Director of the Pacific Region of the BIA approved the TCAP in a two sentence decision without any explanation or rationale for the decision. A copy of BIA's June, 2013 decision letter is included in the EA Appendix M as well. Mr. Grimm and his legal counsel were not provided with notice of the approval, or of its consideration, either before or after the fact.

A. The EA Is Based on An Incorrect Interpretation of the Law Governing Trust Acquisitions.

In the EA, BIA states that "property ... located within a Tribal Consolidation Area [is to be] given the same level of scrutiny as land acquisitions on or adjacent to a tribe's reservation." EA at 1-5. BIA is wrong. Thus, to the extent BIA's misunderstanding of the law influenced its consideration of the environmental impacts of the proposed action in the EA, the EA is inadequate, fatally flawed, and must be revised and recirculated.

P328-06 Cont.

BIA bases its assertion on 25 C.F.R. § 151.3(a), which states that "land may be acquired for a tribe in trust status (1) when the property is located within the exterior boundaries of the tribe's reservation or adjacent thereto, of within a tribal consolidation area." BIA assumes from the fact that land "within a tribal consolidation area" is included in the same sentence as land "located within the exterior boundaries of the tribe's reservation or adjacent thereto" that the standard for reviewing a request to acquire land "within a tribal consolidation area" in trust is the same as the standard for acquiring on-reservation land, or land adjacent thereto. It is not. BIA wrongly assumes that the standard for reviewing a request to acquire land "within a tribal consolidation area" in trust (off reservation) is the same as the standard for reviewing a request to acquire on-reservation land in trust.

The standards for reviewing proposed trust acquisitions are found in section 151.10 and 151.11. ***The standards in 151.10 apply only to on-reservation acquisitions***, not to lands outside the reservation that happen to be within a tribal consolidation area.

For on-reservation tribal acquisitions, the Secretary must consider: (1) the existence of any statutory authority for the acquisition; (2) the tribal need for the land; (3) the purpose for the which the land will be used; (4) the impact of the land's removal from state and local tax rolls; (5) the jurisdictional problems and potential conflicts of land use that may arise; (6) whether the BIA is equipped to discharge the additional

[2] A map of the Tribal Consolidation Area is shown in Figure 1-2 of the EA.

responsibilities resulting from the acquisition of the land in trust status; and (7) environmental compliance.

The standard for reviewing off-reservation acquisitions, even if they are within a tribal consolidation area, is found in section 151.11. For off-reservation acquisitions (i.e., acquisitions of lands that are located outside of and noncontiguous to the tribe's reservation – even if they are within a tribal consolidation area), the Secretary must consider the factors listed in 151.10 plus give "greater scrutiny to the tribe's justification of anticipated benefits from the acquisition" and give "greater weight" to the "concerns raised by the state and local governments having regulatory jurisdiction over the land to be acquired." Specifically, 25 C.F.R. § 151.11(b) and (d) provide:

> "The Secretary shall consider the following requirements in evaluating tribal requests for the acquisition of lands in trust status, when the land is located outside of and noncontiguous to the tribe's reservation, and the acquisition is not mandated:
>
> . . .
>
> (b) The location of the land relative to state boundaries, and its distance from the boundaries of the tribe's reservation, shall be considered as follows: as the distance between the tribe's reservation and the land to be acquired increases, the Secretary shall give greater scrutiny to the tribe's justification of anticipated benefits from the acquisition. The Secretary shall give greater weight to the concerns raised pursuant to paragraph (d) of this section. (Emphasis added.)
>
> (d) Contact with state and local governments pursuant to § 151.10 (e) and (f) shall be completed as follows: Upon receipt of a tribe's written request to have lands taken in trust, the Secretary shall notify the state and local governments having regulatory jurisdiction over the land to be acquired. The notice shall inform the state and local government that each will be given 30 days in which to provide written comment as to the acquisition's potential impacts on regulatory jurisdiction, real property taxes and special assessments." (Emphasis added.)

This standard applies to all off-reservation acquisitions, without exception, and therefore must be applied to BIA's consideration of the Proposed Action. Thus, BIA must demonstrate in the EA that its analysis of the environmental impacts of the Proposed Action was not influenced in any way by its misunderstanding of the level of scrutiny that must be applied to the Proposed Action.

P328-06
Cont.

In this instance, the BIA completely failed to notify any local governmental agency, or the property owners whose lands lie within the resulting TCAP, that approval was contemplated or that approval had been granted. A local government or interested party cannot comply with the 30-day comment period if kept in the dark regarding the entire process.

Notwithstanding the clear and unambiguous language of 25 C.F.R. § 151.11, the EA provides that: "[a]ccording to the land acquisition policy defined in 25 CFR 151.3(a)(1), land may be acquired in trust status for a tribe when the property is located within a Tribal Consolidation Area ***and given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation***." (Emphasis added.)

Nothing in the regulations or existing law supports this bold statement. Indeed, 25 C.F.R. 151.3(a)(1) provides:

"(a) Subject to the provisions contained in the acts of Congress which authorize land acquisitions, land may be acquired for a tribe in trust status:

(1) When the property is located within the exterior boundaries of the tribe's reservation or adjacent thereto, or within a tribal consolidation area."

P328-06
Cont.

Nothing in this language modifies the clear and unambiguous language of 25 CFR § 151.11, which requires the Secretary to give greater weight to the concerns raised by state and local governments and greater scrutiny to the Tribe's justification for the anticipated benefits of the acquisition.

There are no exemptions or exceptions to the applicability of this increased scrutiny for lands within a tribal consolidation area contained in 25 C.F.R. § 151.11 or any other applicable regulation. The mere fact that 25 C.F.R. §151.3 provides that the Secretary may place lands into trust "[w]hen the property is located within the exterior boundaries of the tribe's reservation or adjacent thereto, or within a tribal consolidation area" does not mean that the lands located within a tribal consolidation area located outside the exterior boundaries of an existing reservation, such as the Parcels, are exempt from the increased level of scrutiny as provided for in 25 C.F.R. § 151.11.

BIA must demonstrate in its EA that its analysis of the environmental impacts of the Proposed Action was not modified or influenced in any way by: (1) its failure to properly approve the TCAP; (2) its failure to provide proper notice and opportunity to comment in opposition to approval; and (3) its failure to invoke the heightened level of scrutiny that must be applied to off-reservation acquisitions, even if they are within a tribal consolidation area.

B. The Tribal Consolidation Plan is Inconsistent with the Indian Land Consolidation Act.

The EA's analysis is informed by BIA's approval of the TCAP. The stated purpose of the Plan is to "assist the Tribe in acquiring additional lands in order to increase the tribal land base and provide sufficient land for housing, economic development and government purposes." P. 2.

Although it is nowhere stated, BIA appears to have approved the TCAP under the purported authority of the Indian Land Consolidation Act (ILCA), which provides: ". . . any tribe. . . is authorized, with the approval of the Secretary to adopt a land consolidation plan providing for the sale or exchange of any tribal lands or interest in lands for the purpose of eliminating undivided fractional interests in Indian trust or restricted lands or consolidating its tribal landholdings." 25 U.S.C. § 2203(a).

The TCAP does not identify any undivided fractionalized interests within the Tribal Consolidation Area. In actual fact, the ***sole*** landholding owned by the Tribe within the Tribal Consolidation area is Camp 4 – the Parcels. All other land within the Tribal Consolidation Area is owned by non-Tribe private property owners. The TCAP fails to identify any fractionalized parcels that the Tribe proposes to eliminate.

P328-06
Cont.

The TCAP does not qualify as a "land consolidation plan" under ILCA and BIA lacked authority to approve it. Therefore, to the extent that the analysis in the EA is informed by the TCAP, the EA is deficient and must be corrected and recirculated.

C. BIA Failed to Give Proper Notice of the Tribal Consolidation Plan.

As discussed above, the analysis is informed by the TCAP. BIA, however, failed to provide proper notice under its own regulations that it was considering approving the TCAP. It also failed to provide notice to the state and local governments ***or to the private property owners who have substantial investments in their lands.*** The approval must be revoked.. 25 C.F.R. § 2.7 provides: "[t]he official making a decision shall give all interested parties known to the decisionmaker written notice of the decision by personal delivery or mail. 25 C.F.R. § 2.2 defines an "interested party" as "any person whose interests could be adversely affected by a decision in an appeal."

In this case, the BIA approved the plan on June 17, 2013, but failed to provide the County of Santa Barbara, one of the governments most directly impacted by the TCAP approval, with the required notice under 25 C.F.R. § 2.7.

IV. THE EA VIOLATES THE NATIONAL ENVIRONMENTAL POLICY ACT

NEPA compels federal agencies to consider the consequences of their proposed activities on the human environment. 42 U.S.C. § 4331. An EA is a concise public document which has three defined functions:

(1) it briefly provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS);

(2) it aids an agency's compliance with NEPA when no EIS is necessary, i.e., it helps to identify better alternatives and mitigation measures; and

(3) it facilitates preparation of an EIS when one is necessary.

40 C.F.R. § 1508.9(a).

An EA shall include brief discussions of the need for the proposal of alternatives as required by section 102(2)(E) of NEPA, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted. 40 C.F.R. § 1508.9(b).

A. NEPA Mandates that this Project Be Studied in an EIS.

P328-07

In determining whether to prepare an EIS, the federal agency must prepare an environmental assessment and involve environmental agencies, applicants, and the public, to the extent practicable, in preparing the EA, and then based on the EA make its determination whether to prepare an environmental impact statement. 40 C.F.R. § 1501.4(b)-(c). The agency must then determine whether it will prepare an EIS. 40 C.F.R. § 1501.4(c). If an agency determines an EIS will be prepared, it must begin the scoping process, but if the agency determines on the basis of the EA that no EIS will be prepared, it must prepare a finding of no significant impact (FONSI). 40 C.F.R. § 1501.4(d)-(e).

In this instance, the potential environmental impacts resulting from the project are extensive, have not been adequately addressed in the EA, and many are potentially significant and unmitigable as described in more detail in the enclosed consultant comments.

In preparing the appropriate environmental document, the BIA is governed not only by the text of the NEPA statute and the Council on Environmental Quality's (CEQ) implementing regulations, but also by the Department of the Interior's NEPA implementing procedures. See, e.g., 65 Fed. Reg. 52212 (Aug. 28, 2000). These procedures require that the underlying environmental analysis factually, objectively, and comprehensively analyze the environmental effects of the proposed actions and their

reasonable alternatives. [The agency should] systematically analyze the environmental impacts of alternatives, and particularly those alternatives and measures that would reduce, mitigate or prevent adverse environmental impacts or which would enhance environmental quality. 65 Fed. Reg. at 55213.

Under NEPA, the Intergovernmental Coordination Act of 1968 (31 U.S.C. § 6506), and the Intergovernmental Coordination Executive Order (Exec. Order No. 12,372, reprinted in 31 U.S.C. § 6506), federal agencies are required to solicit and consider local views on their projects to the degree to which the potential impacts may produce serious conflicts with local entities and conditions.

P328-07 Cont.

B. The EA Fails to Incorporate Local Agency Input.

Specifically, the CEQ NEPA Regulations "encourage" integration with state and local land use requirements (with the goal of "one project-one document"). As part of this process the lead agency can designate "cooperating agencies" that are involved in the NEPA document preparation and may use the document to satisfy their own environmental review requirements to the extent allowed by law. At the request of the lead agency, any federal, state, local or tribal agency with jurisdiction by law or special expertise can be a cooperating agency.

To the extent possible, all national, regional, State, and local viewpoints shall be considered in planning development programs and projects of the United States Government or assisted by the Government. State and local government objectives and the objectives of regional organizations shall be considered within a framework of national public objectives expressed in laws of the United States. Available projections of future conditions in the United States and needs of regions, States, and localities shall be considered in plan formulation, evaluation, and review. 31 U.S.C. § 6506(c).

P328-08

Moreover, CEQ NEPA Regulations require federal agencies to address inconsistencies between a proposal and state/local laws or plans. The NEPA document should describe the extent to which the federal agency would reconcile the inconsistency. 40 C.F.R. § 1506.2(d); see also Village of Palatine v. U.S. Postal Service, 756 F.Supp. 1079 (N.D. Ill. 1990) (addressing the extent to which a federal agency must document compliance with the Intergovernmental Cooperation Act, explain a decision to conflict with local regulations, and consider project alternatives).

C. The EA Does Not Consider All Reasonably Foreseeable Alternatives.

NEPA requires the consideration of a reasonable range of alternatives to any proposed action. 40 C.F.R. § 1502.14. The EA does not comply with this requirement. It considers only those alternatives that reflect the Tribe's present plans for the development of the parcels. Once the land is taken into trust, however, the Tribe will presumably be free to change its development plans and, unless those changed plans

P328-09

require further BIA approval, they will escape review under NEPA. Thus, for BIA to comply with NEPA in approving the Proposed Action, it must consider all reasonably foreseeable development scenarios for the Parcels, and not just the ones that reflect the Tribe's current plans.

P328-09 Cont.

D. The EA's Analysis of Water Resources and Associated Impacts Is Fatally Flawed

The EA states that for both Alternative A and Alternative B, the Tribe would develop an on-site water supply system that relies on groundwater. EA, pp. 2-7, 2-14. Agricultural irrigation demands are estimated to be 265 AFY with those demands being met through mixing groundwater from existing agricultural wells and recycled water from a wastewater treatment plant (WWTP).

The groundwater supply to be relied on for both Alternative A and Alternative B is groundwater pumped from the Uplands Basin. Figure 1 (attached) depicts the location of the Uplands Basin relative to the TCAP area. Figure 2 depicts the location of the Uplands Basin relative to the Parcels. About half of the TCAP area overlies the basin. The Parcels are entirely within the boundaries of the Uplands Basin. As noted in the EA, the Uplands Basin is in a state of overdraft (EA, pp. 3-11, 4-5,), meaning the annual extractions from the basin exceed annual recharge to the basin and without taking corrective actions to balance extractions and recharge, the volume of water in the basin will steadily decrease over time. The EA states that despite this state of overdraft, altered pumping patterns throughout the County and the importation of supplemental water has resulted in more balanced groundwater conditions. It further notes that these changes in water use and the rising water table in the area of the Proposed Action suggest that the three existing wells can be relied upon for agricultural use. EA, p. 4-5. This conclusion is incorrect.

P328-10

As noted in the technical comments below, the hydrograph in Appendix C of the EA indicates declining water levels in the Upland Basin for the period 2003 to 2012. More importantly, the additional extractions associated with the Proposed Action will exacerbate the overdraft conditions in the basin and as groundwater levels continue to drop, current users in the basin are likely to experience adverse impacts such as the drying up of wells and/or decreased production. The Proposed Project's pumping may require these users to deepen their wells or cause changes in water quality that will require additional treatment to make the water suitable for potable use. In addition, the concept that the Proposed Action can rely on groundwater because the importation of supplemental water by other users in the Uplands Basin has decreased total extractions ignores the fact that those other users, like the District, have expended significant funds to purchase that supplemental water to offset their decreased reliance on groundwater. In other words, the Proposed Action will not be paying its fair share of the actual costs of water if it is simply permitted to extract groundwater while other users are spending

significant sums on supplemental water. It is not clear that the proposed mitigation will adequately mitigate potential impacts to existing well users but the mitigation measure will certainly not avoid the general adverse impacts to the Uplands Basin associated with increased extractions since the basin is already in overdraft.

P328-10 Cont.

The EA also fails to provide clear, consistent information about water demands for the Proposed Action. For example, in the Project Alternatives discussion for Alternative A, the EA states that implementation of Alternative A would result in an increased water demand of 380 AFY. EA, p. 2-7. However, in the Alternative B discussion, there is no corresponding explanation of estimated increased water demand. See EA, p. 2-12 to 2-14.

P328-11

Below are more specific technical comments regarding the deficiencies in the EA's impact analysis of water demand:

Water Quality Results. Appendix C, Table 2-6, page 2-11 shows electrical conductivity (EC) at 827 umhos/cm. At this EC level, additional irrigation water will need to be added to leach salts from the soil. The vineyard water demand calculation does not provide for additional leaching water. If the additional leaching water requirement is 12% of the net irrigation requirement then the estimated additional annual water use will be approximately 28 AFY.

P328-12

Frost Protection Water Demand. Many vineyards in the Santa Ynez Valley use water for frost protection because frost in the early Spring is a common occurrence and can damage the new buds. The proposed/existing 300 acre vineyard water use assumes 0.75 acre-feet per acre for irrigation but does not include any water use for frost protection. The EA also fails to discuss the potential location of storage ponds needed to supply the water demand for frost protection, which could be up to 50 gallons per minute (gpm) per acre or 15,000 gpm for the entire 300 acre vineyard. A conservative estimation for the water supply needed to combat frost is two frost events lasting for one hour each. The EA, and ultimately the EIS, should include this impact and provide an accurate calculation for the water necessary for frost protection in this portion of Santa Ynez Valley.

P328-13

Residential Outdoor Water Demand. Appendix C, Page 2-2 (Potable Water Demand) estimates the water demand for Alternative A, which involves construction of 143 single family home sites that are five acres each. The outdoor water use assumes 1.85 acres of each five acre lot will be irrigated with low water use landscaping with an annual water use of 1.85 acre-feet or 1.0 acre-feet per acre. Other outside water use assumes 0.15 acres of lawn at 3.0 acre-feet per acre per year. The EA omits an estimate of water use for gardens, swimming pools or irrigated pastures that may occur on the five-acre residential parcels. Many five-acre parcels located in the Santa Ynez area are used for grazing horses on irrigated pasture. If each five-acre lot has

approximately 3 acres of irrigated pasture at 3.0 acre-feet per acre the estimated additional annual water use will be approximately 1,287 AFY for Alternative A. If each of the one acre parcels proposed for Alternative B have 0.5 acres of irrigated pasture then the estimated additional annual water use will be approximately 215 AFY for Alternative B. The potential additional annual water use is significant in comparison to the total estimated annual water demand for Alternative A and Alternative B, which are 335 AFY and 106 AFY, respectively.

Total Water Demand. The EA's omission of water demand for frost protection and underestimation of outdoor water use, as described above, has resulted in underestimation of total water demand for both Alternatives A and B. The EA estimates that Alternatives A and B would result in an increased water demand of approximately 380 AFY and 155 AFY, respectively. EA, PP. 2-7. Adding in the additional water demands for leaching, frost protection, and irrigated pasture that were overlooked in the EA as described above, the increased water demand is estimated at 1,701 AFY for Alternative A and 404 AFY for Alternative B. As noted above, all demand will be satisfied by extractions from the Uplands Basin but the basin is already overdrafted and cannot sustain any increase in demand. The Thirty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District 2012-2013 (dated April 19, 2013) reports annual change in groundwater storage of -2,400 acre-feet (i.e., annual overdraft) for 2012 to 2013 and an accumulated overdraft of 41,800 acre-feet from 2001 to 2013. (Thirty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District 2012-2013, p. 38, Table 16.) The District spent a considerable amount of money on delivery infrastructure necessary to import supplemental water from the State Water Project (SWP) into the District's water system to reduce its groundwater pumping and mitigate the annual and accumulated overdraft in the overdrafted Uplands Basin. The Proposed Action is expected to result in a 70% increase in the annual overdrafting of the basin and will exacerbate the accumulated overdraft. In the long term, the exacerbation of the overdraft condition will increase pumping costs and eventually exhaust the available groundwater supply. The increased water demand associated with the Proposed Action is not sustainable.

P328-13 Cont.

Water Table. The EA asserts that the groundwater table in the project area "is rising" which suggests that the groundwater supply "can be relied upon." EA, p. 4-5. But this assertion is refuted by information in Appendix C, page 2-18, Figure 2-5 which shows well hydrograph for well 32R1. Well 32R1 extracts water from the Uplands Basin and is located near the two production wells used to irrigate the existing vineyard. The vineyard was planted in 2003, and since that time well 32R1 hydrograph shows a steady decline from 2003 to 2012. The well hydrograph suggests that the groundwater table in the area of the Proposed Action is in a state of decline, which is consistent with the trend and overall state of overdraft in the Uplands Basin. The decline in the well 32R1 hydrograph

P328-14

supports the conclusion that the increased water demand associated with the Proposed Action is not sustainable.

Sewer Service. In Appendix C, Figure 3-1 (Sewer Collection System Layout) Alternative A show the gravity sewer line at a higher elevation than the five-acre lots located at the south boundary of the property just north of Amour Ranch Road. An additional sewer line should be located at Amour Ranch Road for the southern parcels or each parcel will need a sewer lift pump. The EA Fails to Properly Consider Cumulative Impacts, Resulting in Improper and Improperly Segmentation.

P328-14 Cont.

IV. THE EA FAILS TO PROPERLY CONSIDER THE CUMULATIVE IMPACTS OF THE PROPOSED ACTION.

Under NEPA, an EA must assess the cumulative effects of the proposed action. The CEQ regulations define cumulative effects as "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and **reasonably foreseeable future actions** regardless of what agency (Federal or non-Federal) or person undertakes such actions." 40 C.F.R. §1508.7 (emphasis added.) *See Te-Moak Tribe Of Western Shoshone of Nevada v. United States Department of The Interior*, 608 F.3d 592 (9th Cir. 2010). The purpose of cumulative effects analysis is to ensure that the Federal decision-makers consider the full range of consequences that may flow from the proposed action. "Analyzing cumulative effects is more challenging than analyzing direct or indirect effects, primarily because of the difficulty of defining the geographic (spatial) and time (temporal) boundaries. For example, . . . if they are defined too narrowly, significant issues may be missed, and decision-makers will be incompletely informed about the consequences of their actions" CEQ, "Considering Cumulative Effects Under the National Environmental Policy Act".

P328-15

The Tribal Consolidation Plan, approved without compliance with NEPA, includes a "geographical area . . . encompassing approximately 11,500 acres." The Parcels subject to the EA encompass only 1,433 acres of the Tribal Consolidation Area. The Tribal Consolidation Plan provides that: "[t]he Santa Ynez Band of Chumash Mission Indians has clear connections to the Tribal Consolidation Area based on law and cultural use. **The tribal government has the opportunity to return the lost land – which it has had to purchase back – to its jurisdiction and stewardship once more through federal trust status. The intent of this Plan is to assist the Tribe with that goal.**" P. 3 (emphasis added.)

Based on the Tribe's Plan, it is reasonably foreseeable – indeed, it is a stated intent – that the Tribe will seek to place additional lands within the Tribal Consolidation Area into trust status. However, the EA fails to consider the cumulative or incremental impact of the Proposed Action when added to these reasonably foreseeable future actions by the Tribe in seeking to acquire more and more of the TCA. The EA is deficient

and legally flawed. Unless and until the TCAP is revoked, the reasonably foreseeable actions that may be taken pursuant to it must be taken into account in the cumulative effects analysis and the potential impacts of those actions must be thoroughly analyzed and disclosed in the EA.

P328-15 Cont.

V. THE EA FAILS TO PROPERLY AND ADEQUATE ANALYZE A WIDE RANGE OF IMPACTS OF THE PROJECT

As described in great detail in the attached tables produced by land use and technical experts associated with Erler & Kalinowski, Inc. (EKI) and Kimley-Horn, Inc., the EA is flawed and inadequate in its analysis of such key issues as traffic, cultural resources, wastewater, water treatment, schools, visual, threatened and endangered species, air quality, water demand, water supply and quality, and surface water drainage and flooding. These shortcomings are so fundamental that the EA cannot provide the basis for any valid conclusions regarding environmental impacts other than that the impacts will be significant and many will be unmitigable.

V. CONCLUSION

P328-16

The environmental review associated with the Proposed Action is fatally flawed for a wide variety of reasons, stated herein and in the consultant communications included herewith. Environmental review in this instance is fruitless because the Secretary does not have the requisite legal authority to place the Parcels into trust. If the environmental review does proceed, the EA must be corrected for the reasons stated, not the least of which is that it is based on a tribal consolidation plan that was not approved in compliance with the ILCA. The EA would also have to be corrected to ensure that the correct and higher standard for taking off-reservation parcels into trust is applied [See 25 C.F.R. §151.11] and that the EA includes an adequate cumulative impacts analysis that addresses the environmental impacts associated with the Tribal Consolidation Plan and its implementation. Otherwise, the EA does not meet the adequacy standards imposed by NEPA. As described in more detail in the two enclosed consultant letters from EKI and Kimley-Horn and Associates, Inc., the environmental analysis of the EA is fatally flawed because of major omissions in its coverage of a variety of issue areas.

Sincerely,

Susan F. Petrovich

Susan F. Petrovich

Enclosures: 2

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc

Section	Section Name	Page # and Location	Comment	
1.0	**Introduction**			
1.1	Introduction	1-1, Table 1-1	APN areas should match with Figure 1-3. Parcel 3 has different APN information.	P328-17
			Provide a more clear definition of how the potential approval of 25 CFR Part 151 Trust Acquisition is related to the proposed project EA.	P328-18
		1-4, Figure 1-3	APN areas should match with Table 1-1. Parcel 3 has different APN information.	P328-19
			This section should identify nearby or adjacent parcels to provide baseline information on potential spill-over (indirect) effects. There are privately owned parcels in vicinity to the project site that will be affected and those private property owners should be considered as stakeholder parties in consultation and consideration of approval of the EA document.	P328-20
1.2	Location and Setting	1-5, Last paragraph	Would be helpful to reader to demarcate site features (vineyard, horse stable, etc.) on aerial photograph.	P328-21
1.3	Purpose and Need	General	The project's Purpose and Need is based on Chumash cultural preservation (through housing); the highly constrained nature of the existing site by drainage channel, flood plains; and lack of economic opportunities. However, the proposed project fails to support these stated goals because it comprises a sprawling suburban subdivision that disregards most existing site Land Resources and conditions. The Purpose and Need is not consistent with the Project Alternatives site plans.	
		General	Trust Land acquisition is stated to be part of a "tribal community revitalization effort that rebuilds tribal culture, customs and traditions," but the residential development alternatives do not, with exception of a Community Center, support this purpose and need.	P328-22
		1-6	The Need statement is unclear as to how building 134 residences would satisfy the housing needs of the entire Tribe. The EA states that presently 17% of Tribal members and lineal descendants have housing on tribal lands (the Reservation). So if 100% of Tribal members and lineal descendents were to be provided housing, the project would need to provide 5x the housing presently available (+/- 500 residences) but that is not the case. The Purpose and Needs statement needs to explain how the proposed project would satisfy the present and future housing needs of the Tribe and how the residential component (in terms of number of housing units) was derived.	
1.6	Regulatory	1-8, 4th bullet	A Section 404 permit would trigger the requirement to obtain a Section 401 RWQCB permit. Suggest adding 401 to approvals list.	P328-23
		General	The document should clarify whether the project Alternatives being evaluated in this EA need to comply with local land use regulations and whether the proposed development will be exempt from local land use regulations only AFTER the EA is approved.	P328-24

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

2.0	Project Alternatives			
2.1	Selection of Alternatives	2-2, 2nd sentence	"...in detail within the EA as Alternative A". Change B to A.	P328-25
		2-2, 1st paragraph	Cluster concepts R.0.1 and U.0.1, which are not being evaluated in the EA, would represent more realistic lower-impact alternatives than Alternative A and B. The alternatives analysis is limited in scope; additional alternatives should have been considered in the EA.	P328-26
		2-11, 1st paragraph	Applicant appears to commit to "incorporate Build it Green and LEED" but misleads by not committing to "complying" with Build it Green and pursuing LEED Certification. The first criterion for LEED is site selection, which project alternatives do not support. This section should clearly define what elements of LEED and Build it Green will be included in the project and support this commitment with descriptions of these elements in the Alternatives section.	P328-27
2.2	Alternative A – 5 acres allotment	2-6, 2nd paragraph, 2nd sentence	Change "plots" to "lots"	P328-28
		General	Project Alternative A represents a low density McMansion-type of sprawling rural development that is not consistent with the project Purpose and Need or with Chumash cultural preservation priorities as set forth in the Land Consolidation and Acquisition Plan.	P328-29
		2.8, 2nd paragraph, 3rd sentence	Under Roadways, roadway design standards should be indicated.	P328-30
		2-8, Project Construction	"It is assumed that construction of the project would begin in 2014 and would be phased over approximately 4 to 9 years as new tribal homes are needed". This construction timeframe should be reflected throughout the document; however, there is inconsistency with the construction time frame shown in Air Quality (Table 4-1), for example. The description in this section is vague as to how the 9-year construction timeframe would be phased, i.e., no phasing plan is mentioned in the analysis but clearly there is some intention to phase the project. "As new tribal homes are needed" is vague and potentially misleading. If the need for new homes is not a present concern, then the document should reconcile that with the Purpose and Need section and the analysis of the project should be consistent with the timeframe in which the project would be implemented. More information and clarity should be provided as to the timing of the project.	P328-31
2.3	Alternative B – Reduced development density	2-12, 1st paragraph	Project Alternative B, despite having 1-acre lots, sprawls over the entire site, is not clustered, would impact cultural resource sites, drainage channels, existing vistas, existing rural character and is not consistent with the project Purpose and Need or the Chumash cultural preservation priorities set forth in the Land Consolidation and Acquisition Plan.	P328-32
		2-12	It is not clear whether the 80,000 square foot tribal community facility (30 acres reserved for this purpose) includes the 400 space parking lot. Figure 2-2 should indicate where the parking lot would	P328-33

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			be situated on the project site.	P328-33 Cont.
		2-12	Information pertaining to the 100 events per year is inadequate. The description of this alternative indicates that the facility would "occasionally" be made available to the public. One hundred events per year aren't "occasional" because this would average about 2 events PER WEEK. This statement should be more specific.	P328-34
		2-12	This section does not indicate how lighting will be handled at the parking lot, i.e., are the lights in the parking area at 18' height similar to the rest of the site?	P328-35
		Figure 2-2	Alternative B appears to be drawn up in such a way that open space would be utilized for additional housing in the future. The description of Alternative B should be more precise as to the Tribe's intention to maintain currently proposed areas of recreational and open space or whether there are future plans to add housing, similar to Alternative A. Figure 2-2 should indicate the location of the 400 vehicle parking lot.	P328-36 P328-37
2.4	Alternative C – No Action	-	This is the No Action Alternative. This is the environmentally superior alternative.	P328-38
2.5	Comparison of Project Alternatives	2-16, 1st paragraph	Impact to Land Resources is misleading, by saying that despite the fact that Alternative A would have proportionally the greatest land resources impacts due to cut/fill, both alternatives' cut and fill volumes would be "balanced" on the site. This section should be reworded to more clearly compare the two alternatives' impact on Land Resources.	P328-39
		2-17, 4th paragraph	Provide more clear explanation in the document of the impacts and proposed mitigation measures resulting from the removal of critical habitat for protected species designation.	P328-40
			Impacts related to construction noise would NOT be greater under Alternative B, as stated in the section, when Alternative A covers more land area and requires more infrastructure development. This is misleading in the document.	P328-41
		2-16, 3rd paragraph	"As with Alternative A, long-term management goals would favor formal evaluation of eligibility prior to implementing Alternative B; as development at cultural resource locations would result in adverse impacts." This statement is ambiguous and unclear as to what should be evaluated (i.e., the location of resources) and the timing for such an evaluation to occur. Cultural Resource impacts should be thoroughly analyzed and disclosed in this document and eligibility for potentially significant resources onsite disclosed. The impact analysis is incomplete and inadequate.	P328-42
		2-17, 6th paragraph	"The visual character of both alternatives would be compatible with the neighboring East Baseline/Rancho Estates". This statement is unsupported by evidence in the EA. At minimum, there should be visual simulations of the proposed project and a visual comparison to the residential estates. Without visual simulations, the conclusion as to similarity in visual character of a residential subdivision with neighboring residences cannot plausibly be made.	P328-43

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

3.0	Affected Environment	3-1, 1st paragraph, 3rd sentence	"Existing setting descriptions are provided for the . . . "	
3.1	Land Resources		Land Parcels #2, 3, 4 and 5 are located within an Agricultural Preserve as shown Appendix N, however this is not mentioned or its implications discussed in the Affected Environment section. Cancellation of an Agricultural Preserve submits the land to potentially significant changes not permitted within the Agricultural Preserve.	P328-44
3.2	Water Resources	***See comments on Appendices C & D in following Table 2***	-	P328-45
3.3	Air Quality	3-16, Table 3.3-1	No CO 1-hour standard shown in Table 3.3-1. Should include this in the table or provide explanation as to why omitted.	P328-46
		3-22, 2nd to last paragraph	The document says that the analysis is consistent with CEQA but the CEQA requirements are not discussed in this section. This statement is unsupported by adequate documentation and discussion with the EA.	P328-47
			Broken hyperlink to SB County CAS.	P328-48
			Sensitive receptors should be shown on a map.	P328-49
			There is no discussion in this section about Carbon Monoxide Hot-Spots.	P328-50
3.4	Biological Resources	3-27, 3.4.2	Describe both Section 10 and Section 7 consultation processes since the section indicates that a Biological Opinion would be necessary under Section 7.	P328-51
		Figure 3-4	The figure includes three yellow/tan vegetation types but the legend only calls out non-native grassland and oak savanna. Identify the yellowish habitat type in the legend as shown on north end of the map.	P328-52
		3-27, 3.4.2	Indicate whether blue oak trees are protected under the Tribal Oak Tree Ordinance (consistent with statement on page 3-35).	P328-53
		3-34, 3.4.1	Indicate whether the wetlands meet ACOE's definition of a wetland. If unknown, then state in Section 4.0 that a formal jurisdictional delineation will be prepared during the 404 permit process. A formal jurisdictional analysis should be conducted prior to approval of the EA so mitigation measures can be included. At minimum, a requirement should be included in the project conditions of approval that the jurisdictional analysis will be conducted, and applicable mitigation measures incorporated, prior to commencement of grading and construction.	P328-54
		3-36, 3.4.1	A table listing all federally listed species provided by USFWS, CNPS and CNDDB searches for the site should be provided in Section 3.0. This table should describe habitat requirements and whether this habitat was identified on the site. The table should also discuss the likelihood of the species to be found on the site. The information included in this section is incomplete to form a basis of impact determination.	P328-55
3.5	Cultural Resources	3-43	This section does not discuss Traditional Cultural Properties (TCP), regulations and program requirements, and whether the Reservation	P328-56

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc

			itself and/or the project site qualify as a TCP. The regulatory section here should discuss TCPs and their applicability to the proposed project.	P328-56 Cont.
		3-48	A table showing the 16 resources found during the cultural resources investigation should be provided to the extent possible without violating confidentiality requirements. The information provided is inadequate and does not provide enough information to describe the affected environment.	P328-57
		3-49	Not enough information and analysis is provided for paleontological resources. The depth of potential resources should be indicated. The document should provide more information on geological formations that may contain fossils or provide relevant information from the geology section to provide an adequate discussion of the affected environment.	P328-58
3.6	Socioeconomics	3-51, 2nd paragraph	"The Tribe has 136 enrolled tribal members and the Reservation has reached maximum capacity of residential units at 97"... This is a Needs statement and does not belong in this section.	P328-59
3.7	Transportation and Traffic	3-54, 1st paragraph	This section should indicate the days when traffic counts were conducted.	P328-60
		Page 3.54	No significance criteria is provided for either Caltrans or County facilities	P328-61
			No LOS criteria is indicated for the State roadway segments	P328-62
			No LOS criteria is indicated for the County roadways	
			The EA indicates that HCM 2000 methodologies were used, yet the worksheets in Appendix I indicate HCM 2010.	P328-63
			Two-way stop controlled intersections only provides the minor street approach LOS and the methodology for stop controlled intersections vary between 2010 and 2000.	P328-64
		Table 3.7-3	Overall intersection LOS is indicated and not LOS for the side street, per the 2010 methodology for side street STOP controlled intersections. SR-246/SR-154 currently operates at LOS E on the westbound approach.	P328-65
		Table 3.7-4	No MOE (measures of effectiveness) (percent following or travel speed) is indicated.	P328-66
			Delay is not the HCM 2010 methodology for measuring rural streets operations per HCM 2000 and HCM 2010. Percent time following and travel speed are.	P328-67
3.8	Land Use	3-56	Santa Barbara County Zoning designation for the proposed site is AG-II-100 (minimum 100 acre lot size).	P328-68
			The Santa Ynez Valley Community Plan (2009) refers to existing residential rural land uses and states that, "The area is an island of smaller lot residential development that fits the definition of EDRN and *which should not expand to the surrounding large lot productive agricultural lands.*"	P328-69
			The statement, "Various types of residential land uses such as single family dwellings..." is misleading and does not reflect the Santa Barbara County Zoning Ordinance referenced in the section	P328-70

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			(35.42.210) and is not consistent with Section 3.12.1, paragraph three, of the EA. The intent of the County's zoning designation for Residential Agricultural Units is, "to preserve the integrity of agricultural areas," not to develop single-family homes, as indicated in the EA text. In any event, the County's Residential Agricultural Unit ordinance expired and no work is underway to reinstate it.	P328-70 Cont.
3.10	Noise		Section 3.10.3 Existing Noise and Vibration Levels states that noise measurements were taken at Sites 1, 2 and 3 for a 24-hour period, however the table in reference, Table 3.10-6 does not reference Sites 1-3 and has only 15-minute noise level measurements, and only Sites A-F are listed.	P328-71
			Figure 2-1 is stated to have the closest noise receptors shown, and it only shows a site plan for Alternative A. There is no figure in the section or document showing location of sensitive receptors for noise.	P328-72
3.11	Hazardous Materials	*See comments on Appendix H in following Table 2*	-	P328-73
3.12	Visual Resources	3-80	Recommend including a reference map showing location and direction of photos taken in Figure 3-11.	P328-74
		3-79	The discussion of regulatory requirements and visual standards is incomplete. Since the project site is visible from several surrounding roadways, including SR-154 (a state scenic highway) the evaluation of visual resources should follow the highest scrutiny. The Affected Environment discussion should incorporate FHWA guidelines or a similar program for evaluating the impact of a project on scenic roadway corridors and viewsheds. The discussion in this section is incomplete.	P328-75
4.0	**Environmental Consequences**			
4.1	**Alternative A**			
4.1.1	Land Resources		Characterization of construction of a Waste Water Treatment Plant on Parcel 1 as "minimal construction" is misleading.	P328-76
			Grading of equestrian and passive trails should be evaluated for impacts and identified on alternative site plans.	P328-77
			Additional grading recommendations included within Appendix D should be included as formal mitigation measures.	P328-78
			This alternative would impact the existing rural character of the site, which is bound by designated scenic highways, is potentially not consistent with local zoning regulations and would dominate the existing rural residential developments that are much smaller in scale and number of residential units. Section 35.42.210 of the County zoning ordinance requires residential buildings to "not intrude into the skyline." This would require residential structures to be built partially into the existing hills and may require more grading than described in the section.	P328-79
4.1.2	Water Resources	*See comments on*	-	P328-80

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

		Appendices C & D in following Table 2		
4.1.3	Air Quality	4-9, Table 4-1	The evaluation of construction impacts is based on the disturbance of 144 acres (see Appendix B). The text in this section should explain how this figure was derived.	P328-81
		4-9, Construction Impacts	This section should explain the mitigation measures used in the input file and those that would achieve a 50% reduction in DPM emissions from construction.	P328-82
4.1.4	Biological Resources	4-11, 4.1.4	Provide a map depicting the oak trees to be removed as a result of Alternative A.	P328-83
		4-12, 4.1.4	Provide an explanation of why CRLF and VPFS surveys are not required given there is a potential for them to occur on site. If protocol surveys will be required for either species, then they must be performed prior to completion of the EA, with the results of those surveys being disclosed in this EA. Additionally, any impacts to these species as a result of Alternative A should be described in this section.	P328-84
4.1.5	Cultural Resources	4-13, 2nd paragraph	The project site contains a total of 16 cultural resources but no additional information is provided regarding the nature, location, or potential importance of these resources. Thus, the evaluation is unsubstantiated when it determines that "during the final planning phase of the project, the residential units, associated facilities....would be designed to completely avoid physical destruction, damage, alteration, or removal of cultural resource" This needs to be explained in this section. The project's evaluation, including potential impact and avoidance measures, needs to be discussed in the EA and not deferred to a later phase of planning.	P328-85
		4-14, 3rd paragraph	The discussion of potential effects to paleontological resources is incomplete. This section needs to discuss potential cut and fill quantities proposed by the project and how excavation depths may encounter known resources due to the anticipated depth of those resources. The evaluation does not provide enough detail and is conclusory.	P328-86
4.1.6	Socioeconomics	4-15, 2nd paragraph	"The tribe has offered a first draft payment-in-lieu of taxes..., to date the County has not accepted this offer." This section should include the latest information in this regard because it is fairly arguable that if the Tribe and the County have reached no agreement, the lack of agreement constitutes a significant adverse effect.	P328-87
4.1.7	Transportation and Traffic	4-17	It is stated that the PM peak occurs between 4:30PM and 5:30PM. Traffic count data indicates that the peak occurs between 4PM and 5PM.	P328-88
		4-17	This section should clearly describe the "Near-Term" vs. "Horizon-Year" of the project and how those timeframes relate to the anticipated construction timeframe of "4 to 9 years". The information provided herein is incomplete.	P328-89
			This section should discuss the demand generated for bicycle trips and the need for public transit by the project. Bike lanes will be	P328-90

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			installed on SR 154 and SR 246 per the County General Plan.	P328-90 Cont.
		Table 4-5	Overall intersection LOS is indicated and not LOS for the side street, per the 2010 methodology for side street STOP controlled intersections.	P328-91
		Table 4-6	No MOE's are provided in the table to confirm the LOS results	P328-92
			There is no schedule provided for implementation of recommended traffic improvements.	P328-93
	Appendix I	Appendix I	No LOS results or worksheets are indicated for the roundabout alternatives.	P328-94
			No driveway analysis has been conducted on either Baseline Avenue or Amour Ranch Road to identify the need for turn lanes/LOS impacts.	P328-95
			Spacing of the driveways relative to the existing intersections and other driveways is not evaluated	P328-96
			The segment of SR 154 between Edison Street and SR 246 was omitted from the study. This segment should be included in the analysis and documented in the EA.	P328-97
			Page 5 indicates that "…existing data is no longer representative of existing conditions…". It is not clear what this implies.	P328-98
			No LOS significance criteria indicated	P328-99
			LOS worksheets indicate 2010 LOS methodology, yet EIR indicates 2000 methodology.	P328-100
			No MOE's indicted in Tables 3, 8, 11, 14,17	P328-101
			Incorrect MOE used for LOS in Tables 3, 8, 11, 14, 17, which not consistent with HCM 2000 or 2010.	P328-102
			Minor street approach LOS must be reported per HCM 2010 methodology. Existing westbound approach LOS at SR 154/SR 246 is E for all LOS results in the TIA.	P328-103
			A Peak Hour Factor of 1 is utilized for existing and near term rural conditions, which ignores rural peaks and understates delay for all study intersections.	P328-104
			AM and PM peak hour volumes on Figure 6 and 7 do not match the net trip generation for the project. Thus, all project LOS and delays are incorrectly reported for near term and cumulative conditions.	P328-105
			No project driveways on Baseline Street or Amour Ranch Road are evaluated for safety or operations. No LOS results are provided and no signal warrant worksheets are provided. No sight distance analyses are performed.	P328-106
			No side street delays at side street STOP locations are reported or potential impacts identified.	P328-107
			Signalized intersection left turn movements along SR 246 fail under near term and cumulative conditions, which will result in queues spilling onto through lanes, which impacts safety and operations and is a significant impact, which have not been identified.	P328-108
			No signal warrant analysis is provided, yet signals are identified as mitigation measures.	P328-109
			No mitigation geometry has been identified at study intersections, nor are any mitigation worksheets included in Appendix I.	P328-110
4.1.8	Land Use	4-19, 3rd	Methodology: This section assumes that approval of 25 CFR Part	P328-111

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

		paragraph	151 Trust Acquisition has occurred and is misleading. The analysis in this EA should assume full compliance with local land use regulations. The project parcels are not yet exempt from these regulations and the text should describe this more clearly.	P328-111 Cont.
4.1.9	Public Services	4-23, Water Supply	This section should discuss anticipated water demand created by the project. *(See comments on Appendix C in following Table 2.)*	P328-112
		4-23, Wastewater Service	This section should discuss anticipated waste water treatment demand created by the project. *(See comments on Appendix C in following Table 2.)*	P328-113
		4-23	Precise details of the Wastewater Treatment Plant (WWTP), including design considerations and capacity, should be explained in this section.	P328-114
		4-25, last paragraph	The public school districts should be consulted during the environmental process. "The impact of families relocating to the Tribal community after the development is completed would be negligible; therefore, no adverse impacts to local school districts would occur." What is the factual basis for this conclusory statement? This statement must be substantiated and should incorporate feedback from the school district. If this information cannot be provided, the statement cannot be made. Also, since the build-out year of the project is not clear, it cannot be determined what the effect on the school district would be. More evaluation should be provided in this section.	P328-115
4.1.11	Hazardous Materials	***See comments on Appendix H in following Table 2***	-	P328-116
4.1.12	Visual Resources	4-31, Visual Resources, 2nd paragraph	The entire 2nd paragraph is unsubstantiated since there are no visual renderings included in the document or design standards established for the project. The EA should include a formal Visual Impact Assessment, including visual renderings of proposed buildings and the project's effect on the surrounding viewshed and aesthetic character of the area.	P328-117
		4-32, 2nd paragraph	The project would double the number of residential structures on the project site. Local views would be affected by the project and the conclusion that "views would be similar" is not substantiated by any visual evidence. A formal Visual Impact Assessment including renderings of buildings and their location on the project site should be completed.	P328-118
4.2	**Alternative B**			
4.2.1	Land Resources	4-32, 5th paragraph	Additional grading recommendations included within Appendix D should be included as formal mitigation measures in Section 5.0.	P328-119
4.2.2	Water Resources	***See comments on Appendices C & D in following Table 2***	-	P328-120
4.2.3	Air Quality	4-35	Construction air quality impacts are evaluated over a 4-year period but the construction timeframe could range from 4 to 9 years as indicated in earlier sections. The evaluation in this section is inconsistent with the project description described in earlier	P328-121

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			sections. It is inadequate at present because it fails to include analysis of alternative build-out time scenarios.	P328-121 Cont.
		4-36	This section should discuss what mitigation measures were included in the evaluation such that construction emissions would be reduced by 50%. As it stands, the determination is unsubstantiated.	P328-122
4.2.4	Biological Resources	4-37, 4.2.4	Provide a map depicting the oak trees to be removed as a result of Alternative B.	P328-123
		4-39, 4.2.4	Any impacts to CRLF as a result of Alternative B should be quantified and described in more detail in this section.	P328-124
4.2.5	Cultural Resources	See above.	See above. It is plausible this alternative would reduce effects compared to Alternative A, however, more information is required to make that determination.	P328-125
4.2.6	Socioeconomics	-	The methodology used to determine project related adverse impacts to socioeconomics for Alternative B are the same as Alternative A. Please refer to the comments above.	P328-126

4.2.7	Transportation and Traffic	-	The methodology used to determine project related adverse impacts to transportation and circulation for Alternative B are the same as Alternative A. Refer to the Transportation and Traffic comments noted above.	P328-127
4.2.8	Land Use	4-44, 1st paragraph	Methodology: This section assumes that approval of 25 CFR Part 151 Trust Acquisition has already occurred and is misleading. The analysis in this EA should assume full compliance with local land use regulations. The project parcels are not yet exempt from these regulations and the text should describe this more clearly.	P328-128
4.2.9	Public Services	-	Impact assessment methodology is the same, refer to comments above.	P328-129
4.2.10	Noise	-	Impact assessment methodology is the same, refer to comments above.	P328-130
4.2.11	Hazardous Materials	***See comments on Appendix H in following Table 2***	-	P328-131
4.2.12	Visual Resources	4-49, 7th paragraph	This section only refers to proposed residential development being similar to existing housing surrounding the site, and does not disclose impacts to "important scenic vistas [or] introduce visual elements that would conflict with the Santa Ynez Valley's rural atmosphere." Describe the impacts related to the significance criteria as stated in the section.	P328-132
		General	The project fails to identify specific design guidelines and measures that will be included in the project to reduce or avoid impacts to existing scenic vistas and the rural character of the area from the design of the residential homes and other project facilities, including measures identified in the Santa Ynez Valley Community Plan, such as, building height limits, minimizing visual skyline intrusion, compatibility with surrounding environment, and building materials/colors that are compatible with the existing terrain. The document should be revised to address how the project	P328-133

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			would meet these guidelines and measures, and if not, how the impacts would be mitigated.	P328-133 Cont.
		General	Earlier sections stated the entire property was within view of SR-154, as the property's hills ascend up from SR-154, however this section states only low lying areas of the project site would be positioned within the viewshed of SR-154. Clarify what is visible from SR-154 and provide photo simulations of the project from the roadway to better illustrate impacts on visual resources and this designated scenic highway.	P328-134
4.3	**Alternative C – No Project Alternative**	General	Under Alternative C, the No-Action Alternative, no development or change in use would occur on the property for the foreseeable future. The site would operate as it does presently.	P328-135
4.4	**Cumulative Effects**			
4.4.1	Land Resources	4-54	This section says that future developments would be in compliance with local and state codes. The document needs to identify whether onsite development is, and once the property is in trust will be, subject to local zoning and land use/zoning regulations.	P328-136
4.4.2	Water Resources	***See comments on Appendices C & D in following Table 2***	-	P328-137
4.4.4	Biological Resources	4-58, 4.4.4	Explain how the County Santa Barbara regulates local endangered species. Indicate whether the County is signatory to a multiple species conservation plan and; therefore, would issue take permits for covered species. Also state that County regulations would apply to developments outside of tribal boundaries.	P328-138
4.4.5	Cultural Resources	-	Generally agree that following prevailing guidelines for cultural resources would reduce and minimize cumulative effects. However, the project's mitigation measures and the information provided in the analysis section are unsubstantiated and therefore determination of cumulative effect cannot be made.	P328-139
4.4.6	Socioeconomics	-	The project would generate "significant, short-term (2 years) employment benefits to a local construction sector…".. this is not entirely accurate since the buildout timeframe is stated to be 4 to 9 years.	P328-140
4.4.7	Transportation and Traffic	-	See comments on Appendix I, shown above.	P328-141
4.4.8	Land Use	4-64, 4th paragraph	The proposed alternatives could contribute to the conversion of surrounding agricultural land. The project inherently converts existing agricultural land and would thereby establish a precedent for surrounding lands. This section should be revised to reflect impacts, including growth inducement.	P328-142
4.4.9	Public Services	-	There is no mention of parks or school district enrollment in this section.	P328-143
4.4.10	Noise	-	No comments.	
4.4.11	Hazardous Materials	***See comments on Appendix H in***	-	P328-144

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

		following Table 2		
4.4.12	Visual Resources	General	The project fails to identify specific design guidelines and measures that will be implemented as part of the project to avoid interrupting or modifying existing scenic vistas and the rural character of the area from the design of the residential homes and other project facilities, including measures identified in the Santa Ynez Valley Community Plan, such as, building height limits, minimizing visual skyline intrusion, compatibility with surrounding environment, and building materials/colors that are compatible with the existing terrain. The EA should be revised to address how the project would meet these guidelines and measures, and if not, how the impacts would be mitigated.	P328-144 Cont. P328-145
		General	Earlier sections state that the entire property is within view of SR-154, as the property's hills ascend up from SR-154, however this section states that only low lying areas of the project site would be positioned within the viewshed of SR-154. Clarify what is visible from SR-154 and provide photo simulations of the project from the roadway to better illustrate impacts on visual resources and this designated scenic highway.	P328-146
4.5	**Indirect and Growth-Inducing Effects**			
4.5.1	Indirect Effects	4-68	Environmental issue areas other than local infrastructure should be considered in this section.	P328-147
4.5.2	Growth-Inducing Effects	4-69, 1st paragraph	"A project that would induce "disorderly" growth (i.e., would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts." This statement is generally true and should include an analysis of how the project is or is not orderly growth. This section and prior sections should discuss how the Proposed Action is/is not consistent with local and regional land use plans and included as foreseeable and planned growth.	P328-148
5.0	**Mitigation Measures**			
5.1	Land Resources	5-1, 2nd paragraph	Land Resources BMPs are only identified in the section, whereas the text refers to "mitigation measures below." Clearly identify required/committed mitigation measures for this section.	P328-149
		5-1, 2nd paragraph	BMPs referenced here, in Section 2.0, apply only to street signs and lighting. These BMPs are inadequate to mitigate for the impacts to visual resources (existing rural hillsides, vistas, etc.) according to the residential and community center development plans.	P328-150
5.2	Water Resources	*See comments on Appendices C & D In following Table 2*	-	P328-151
5.3	Air Quality	5-3	The mitigation measures shown in this section for air quality do not match the mitigation that was used in the CAP and HAP emissions	P328-152

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			analysis in previous sections. The mitigation measures should incorporate similar mitigation that was included in the URBEMIS air quality model and used to make the finding of no significant adverse effect.	P328-152 Cont.
		5-3.1	The mitigation measures under this section are incomplete in discussing timing and responsible party for ensuring that the mitigation is completed. The last mitigation measure, "The Tribe shall work with the Santa Ynez Valley Transit to extend public transportation to the project site…" is vague as to timing and seems merely as a symbolic measure. It is not a mitigation measure because it includes no standard for determining whether the mitigation measure has accomplished mitigation of the impact. Mere consultation without an action plan is not mitigation.	P328-153
5.4	Biological Resources	-	See previous comments regarding methodology of impact assessment and need for present and future studies to be included as mitigation for this project.	P328-154
5.5	Cultural Resources	5-7	It remains to be determined how the mitigation measures in this section would be effective in reducing potential adverse effects on cultural resources because little or no information of adequate detail with regard to cultural and paleontological resources within the project area is provided in earlier sections. Similarly, Section 4 says that future planning is required to help to avoid and reduce adverse impacts to cultural resources, but there is no mitigation measure that dictates how future planning would be implemented to accomplish that goal. Like consultation, "future planning" is not a mitigation measure. It provides absolutely no standard for determining successful mitigation.	P328-155
5.6	Socioeconomics	5-8	The County has not accepted the first draft agreement for payment of in-lieu of taxes offered from the Tribe (see Section 3.0). To avoid the potential for adverse environmental effect that an impasse could create, this section should address a potential resolution or steps that could be taken toward resolution of this issue. As written, the section is incomplete and should address what happens if no agreement is reached.	P328-156
5.7	Transportation and Traffic	Section 5.7	No funding mechanism is identified for the identified improvement/mitigation. If the project pays its fair share, it does not guarantee that the improvement will ultimately be implemented and will mitigate the impact. The County has not yet implemented the transportation mitigation fee system described in the Santa Ynez Valley Community Plan so there is no fund into which mitigation fee can be deposited and no standard for assessing those fees on development. In the absence of a mitigation fee system, each project must provide mitigation for the transportation and traffic impacts resulting from that project.	P328-157
5.8	Land Use	General	The section 4.1.8 states, "adverse impacts to land use would result if the implementation of Alternative A resulted in the conversion of a significant percentage of County designated prime agricultural	P328-158

TABLE 1 – COMMENTS ON TEXT AND APPENDIX I – TRAFFIC IMPACT STUDY

Kimley-Horn and Associates, Inc.

			lands or other protected lands," however Section 5.0 states that no impacts will result and no mitigation is required. Document the mitigation measures to eliminate these impacts.	P328-158 Cont.
		5-9, 4th paragraph	Mitigation measures should be included in this document, unless the Trust Lands action has been approved prior to this analysis.	P328-159
5.10	Noise	5-10	BMPs and periodic noise monitoring should be proposed for construction activities adjacent to existing residential receptors, and noise mitigation measures should be listed to ensure that construction noise stays within federal thresholds.	P328-160
5.11	Hazardous Materials	*See comments on Appendix H in following Table 2*	-	P328-161
5.12	Visual Resources	5-11	Identify the specific measures in Section 2.0 and the applicant's ability to commit to incorporating these measures into the project, in this section. A formal Visual Impact Assessment should be prepared and should conclude a requirement that additional aesthetic or architectural guidelines should be followed to reduce visual impacts to the area and surrounds.	P328-162
6.0	**Consultation**	-	-	
6.1	Federal Agencies	6-1	Tribe should consult with the ACOE and the RWQCB to develop acceptable minimization measures to reduce stream channel and adjacent upland area impacts to the greatest extent possible.	P328-163
6.3	Local Agencies	-	Tribe should consult with the local school districts. The tribe should also consult with property owners adjacent to the project site.	P328-164

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

Section	Section Name	Page #, and Location	Comment	
	Appendix C	3-17, Table 3-9	**The Demand Estimates Are Not Well Substantiated and Are Likely Under-Estimated.** The total water demand for the proposed development (including current and proposed additional demands) is not clearly stated; it only shows up in the Appendix C, Chapter 3 water balance calculations (Table 3-9) which are not well explained or annotated. Further, while unit indoor and outdoor demand factors are presented as the basis for estimating indoor and outdoor water demands, no technical or empirical basis is provided to substantiate the demand factors that have been assumed. This is of particular concern for the estimates of outdoor water use which encompass the majority of the projected demand for the development. The demand factors that have been assumed for turf irrigation (3 AFY/AC) and for vineyard irrigation (1.0 AFY/AC) seem extremely aggressive (i.e., low) and the total demand of the project appears to have been under-estimated. Information on vineyard irrigation demands based on historical operations of the vineyard irrigation wells, if available, should be considered as a basis for the assumed vineyard demands.	P328-165
	Appendix C	2-3 through 2-5, Tables 2-1 through 2-5	**Tables of Calculations Are Poorly Annotated.** Demand calculations presented in Tables 2-1 through 2-5 are poorly described and difficult to reproduce. The terms "Unit", "Demand", and "Quantity" are often applied inappropriately as column headings, and certain assumptions appear to be missing (e.g., factors relating the Community Center and "Admin" unit demands to total demands in gpm and AFY in Table 2-3).	P328-166
	Appendix C	2-4, Table 2-3	**Demands at the Tribal Government Center Do Not Include All Potential Uses.** Demands presented in Table 2-3 only consider "events" (up to 100 per year) at the Tribal Community Center and "Admin" demands for up to 75 employees. Demands associated with use of the tribal retreat are shown as being included in the "events" demands, but no further assumptions to support this are given. Tribal Government Center irrigation demand is described as being met with recycled water and non-potable irrigation water, but those demands are not quantified or accounted for elsewhere.	P328-167
		2-24 to 2-25, Table 2-8	**Potable Water Storage Does Not Include Adequate Operational Storage.** Potable water storage is stated to	P328-168

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

			include three storage components: emergency storage, storage for fire flows, and operational storage. Operational storage is stated to be 25% of the maximum day demand. There are no supporting data for the calculation but the operational storage is stated to be 23,000 gallons for alternative A and 25,000 gallons for Alternative B. The maximum day demand occurs during the summer months when the irrigation needs are high and is usually calculated as 2.5 to 3 times the average annual daily demand. The average annual daily demand is 235 gpm for Alternative A and 93.4 gpm for Alternative B. Assuming the factor of 2.5 as the ratio between average annual daily demand and maximum day demand, the operational storage for Alternative A is calculated to be 168,000 gallons and Alternative B is calculated to be 84,000 gallons. These values greatly exceed the stated operational storage values of 23,000 gallons for Alternative A and 25,000 gallons for Alternative B.
	Appendix C	2-12, 2-15, Figures 2-4 and 2-5	**The Long-Term Reliability of the Potable Water Supply Source Is Not Adequately Demonstrated.** The potable water supply source for the proposed development is the underlying Santa Ynez Uplands groundwater basin. The document acknowledges, in passing, that historically the groundwater basin was in overdraft, but states that recent rising water levels, as a result of the importation of State Water Project ("SWP") water to the region, indicate that the basin has recovered and is in a stable condition. The possible correlation between increased water imports to the region and rising groundwater levels in wells in the Project area is not discussed thoroughly enough (i.e., related to the timing, magnitude of both purported events, and the strength of the correlation). The sources that the document cites for information regarding the groundwater basin are significantly outdated. Further, while the hydrographs presented for nearby wells do show some water level recovery since the inception of SWP deliveries, the recent trends in the groundwater levels once more show a decline. The recently observed decline, and its implications on future groundwater basin yield, especially with respect to dry years, other potential future demands on the groundwater basin, and the continued loss of reliability in SWP water is not addressed in this document.

P328-168 Cont.

P328-169

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

	Appendix C	2-5	**No Map of the Project Site in the Context of the Larger Groundwater Basin is Provided.** A map showing the project location within the larger Santa Ynez Uplands Groundwater Basin should be provided in order to assess the project in relation to other hydrologic, hydrogeologic, and anthropogenic features, including recharge areas, major watercourses and population centers.	P328-170
	Appendix C	2-8	**Water Level and Groundwater Production Data for Existing Wells Should be Provided.** Irrigation Wells #2 and #3 are described as having air lines for measuring water levels and flow meters. However, no information is provided as to what water level measurements or groundwater production data exists for these two wells. This information would be useful in evaluation of the wells' production capacity and long-term water level trends.	P328-171
	Appendix C	2-9, Figure 2-2	**Figure 2-2 Does Not Provide Adequate Information.** Figure 2-2 shows wells with water level data available through the California Department of Water Resources. It is not clear how this information was or is intended to be used by the Project proponents. Furthermore, the map does not extend to the south of the Project property nearly as far as it does to the east and west, and north, and therefore it is impossible to ascertain whether there are wells south of the Project property that may be impacted by Project groundwater extraction.	P328-172
	Appendix C	2-10	**Peak Hour Demand for Alternative A Is Incorrect.** Following the method for calculating Peak Hourly Demand described in the report (i.e., multiplying the Average Day Demand by the Peak Hour Factor of 3.5), the peak hourly demand for Alternatives A is 727 gpm, not 655 gpm as stated on Page 2-10.	P328-173
	Appendix C	2-12, 2-15, 2-16	**The Offsite Impacts to Nearby Groundwater Wells Are Not Adequately Evaluated.** The impact to nearby wells of increased groundwater extraction to support the proposed development is not adequately addressed as part of this document. While the issue is raised that the water levels in offsite wells may be impacted by the proposed development, no quantitative assessment of the magnitude of those impacts is presented. Moreover, any potential water quality impacts are not addressed.	P328-174

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

	Appendix C	2-15	**The Options Presented to Mitigate Potential Offsite Well Impacts Are Insufficient to Address the Potential Issue.** The document discusses mitigation of potential off-site well impacts through the implementation of water conservation measures throughout the development. It was understood that the project water demands already encompassed water conservation measures, resulting in aggressively low landscape irrigation demand factors (e.g., 1.0 AFY/acre), and, as such, it is unclear what additional mitigation, if any, realistically could be achieved through the measures presented in the document. Further, as the proposed mitigation measures should be included in the basic design of the development, it is unrealistic to present them as actions that could be taken in response to an impact that was identified after the development was completed and groundwater extraction was occurring. At a minimum, this section should discuss real, practical mitigation efforts that will be implemented for offsite wells in response to water level and water quality impacts as a result of increased groundwater extraction for the development, including but not limited to actions such as lowering pumps, drilling new wells, or installing well-head treatment systems.	P328-175
	Appendix C	2-10	**There Is Inadequate Evaluation of the Potable Water Supply Quality and Treatment Needs.** Very limited and dated water quality data are presented in support of the adequacy of the groundwater to meet the potable water demands of the proposed development. The data presented for Well #2 show that the water is very hard (i.e., total hardness of 386 mg/L), suggesting that water softeners may be desirable or necessary for potable use, with resulting increased salinity in wastewater. Further, the document presents no discussion of possible treatment options; chlorination of the water is not even mentioned. This issue extends to the evaluation of the suitability of the recycled water for its intended use for irrigation (i.e., it is not clear that the recycled water will be of sufficient quality to support the landscaping that is intended for the project).	P328-176
	Appendix C	2-19, Figure 2-8	**Potable Water Upper Pressure Zone Has No Storage.** No storage is provided for the upper pressure zone to accommodate low flow conditions. It is proposed that a low flow "jockey pump" be used to keep the upper zone pressurized. This is not energy efficient.	P328-177

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

	Appendix D	General	**Analysis Does Not Consider All the Santa Barbara County Stormwater Management Requirements for New Development.** The Drainage Feasibility Analysis evaluates detention basins needed to maintain stormwater discharges at pre-development peak flow rates. This method is obtained from the *Santa Barbara County Flood Control and Water Conservation District ("Flood Control District") Standard Conditions of Project Plan Approval*, dated January 2011. Under both project scenarios evaluated, detention basins would be required within the Project to maintain predevelopment peak flow rates. The Drainage Feasibility Analysis also generically considers the incorporation of low-impact development features that would enhance stormwater quality. However, the Flood Control District has also adopted detailed stormwater quality management procedures in their guidance *Low-Impact Development Hydrologic Analysis*, dated July 1999, for conducting hydrological analyses for low-impact developments that, in addition to peak runoff rate control, also address (1) time of concentration (Tc) (i.e., the amount of time it takes for a watershed to be fully contributing flow at its point of discharge), (2) runoff volume control, (3) flow frequency/duration control, and (4) water quality control. These additional requirements are discussed further below.	P328-178
	Appendix D	General	**Maintaining the Pre-Development Time of Concentration.** The Flood Control District requires that a development maintain the Tc at pre-development levels. The Drainage Feasibility Analysis does not provide any calculations or estimates of whether Tc will be maintained in each watershed and sub-watershed.	P328-179
	Appendix D	General	**Maintaining the Pre-Development Runoff Volume.** The Flood Control District requires that not only the pre-development peak flow rates and Tc be maintained, but also that the total runoff volume not be increased as a result of the development. The goal is to select the appropriate combination of management techniques that emulate the hydrologic functions of the pre-development condition to maintain the existing runoff volume. The Drainage Feasibility Analysis does not include any discussion or calculations of how maintaining pre-development runoff volumes will be achieved.	P328-180

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

	Appendix D	General	**Maintaining Flow Frequency/Duration Control.** Flow duration control differs from the peak runoff control used to design detention facilities for flood control by requiring management of stormwater discharges over the full range of flows based upon a long-term precipitation record. Flow duration control requires that the increase in surface runoff resulting from new impervious surfaces be retained on-site with gradual discharge either to groundwater through infiltration, losses by evaporation, and/or discharge to the receiving stream at a level below the critical flow that causes sediment movement in the stream bed. The Drainage Feasibility Analysis does not evaluate flow duration controls for the Project.	P328-181
	Appendix D	General	**Providing Appropriate Water Quality Control.** The Flood Control District requires that low-impact development be designed to provide water quality treatment for the first ½ inch of runoff from impervious areas. The goal of providing water quality control is to remove pollutants from the initial stormwater runoff from impervious surfaces, which typically contains the majority of the stormwater pollutants. The Drainage Feasibility Analysis does not quantify how the development will treat the first ½ inch of runoff from impervious surfaces.	P328-182
	Appendix D	General	**Changes in Pollutants between Pre- and Post-Development Conditions.** The addition of roads, traffic, homes, and other development features will generate new sources of pollutants including metals, hydrocarbons, pesticides, and other anthropogenic pollutants that are not currently present in stormwater runoff. The Drainage Feasibility Analysis does not include any discussion about how low-impact development or other integrated management practices will control or attenuate the presence of these new stormwater pollutants.	P328-183
	Appendix H	1-1	**Phase I Should Have been Performed Under ASTM E2247-08.** The Phase I ESA was performed under ASTM E1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* However, given the size of the Subject Property (approximately 1,433 acres) and agricultural/rural nature of the Subject Property, the Phase I ESA should have been performed under ASTM E2247-08, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property.* ASTM E2247-08 allows for limitations	P328-184

TABLE 2 – COMMENTS ON:
APPENDIX C – WATER AND WASTEWATER FEASIBILITY ANALYSIS
APPENDIX D – GRADING AND DRAINAGE FEASIBILITY ANALYSIS
APPENDIX H – PHASE 1 ENVIRONMENTAL SITE ASSESSMENT

			made during the site reconnaissance where not all areas of Subject Property can be directly observed given the large size of the property. Not all areas of the Subject Property were observed during the site visit by AES, and no discussion of limitations due to the size of the Subject Property were made in the Phase I report, which is required under ASTM E1527-05. Thus, ASTM E2247-08 would have been the more appropriate standard under which the Phase I ESA should have been performed.	P328-184 Cont.
	Appendix H	General	**No User Defined in Phase I ESA Report and No User Questionnaire Completed.** The "User" of the Phase I ESA report is the entity seeking to use ASTM E1527-05 to complete the ESA of the Subject Property. The AES Phase I ESA report did not identify the User of the Phase I ESA report, which is required under ASTM 1527-05. Also, ASTM E1527-05 requires that the User provide any specialized knowledge of the Subject Property to the Environmental Professional that is conducting the ESA. This is typically provided in the former of responses to a "User Questionnaire". The AES Phase I ESA report did not contain a completed User Questionnaire. The lack of a completed User Questionnaire was not raised by AES in the Phase I ESA report as a "data gap" and the potential significance of such missing information was not discussed in the Phase I report.	P328-185
	Appendix H	General	**No Search for Environmental Liens or Activity or Use Limitations (AULs) Performed.** ASTM E1527-05 requires that either the User or the Environmental Professional conduct a search for environmental cleanup liens or AULs recorded against the Subject Property. There is no indication in the Phase I report that such search was conducted. Also, there is no discussion in the Phase I report whether this missing information presents a significant data gap in the performance of the Phase I ESA.	P328-186
	Appendix H	General	**No Apparent Observations Made of Building Interiors.** Section 9.2.2 of ASTM E1527-05 states that the interiors of structures should be "visually and/or physically observed", assuming there are no significant access limitations to such structures. It is unclear in the Phase I ESA report if the interiors of structures, e.g., barns and other storage structures, were visually observed during the site visit. ASTM requires that if certain access limitations are	P328-187

			encountered during the site visit, that such limitations be noted in the Phase I report. No access limitations were noted in the AES Phase I ESA report.	P328-187 Cont.
	Appendix H	5-1	**Information Presented in Conclusions Section not Discussed in Body of Report.** The "Findings and Conclusions" section of the Phase I ESA report (Section 5) indicates the presence of groundwater wells, large above ground storage tanks, 55-gallon drums, paint cans, 25-gallon fuel tanks, and pesticide storage on the Subject Property. These observations were not discussed or elaborated on earlier in the main body of the report, and the significance of the presence of such features was not discussed in the report.	P328-188
	Appendix H	General	**Agricultural Use of Property and No Discussion of Potential for Pesticides in Soils.** The Phase I ESA report indicates that approximately 240 acres of the Subject Property are in active vineyard production. There is no discussion of the current or past use of pesticides on the vineyard portion of the Subject Property. If pesticides were applied to the vineyard portion of the Subject Property, elevated concentrations of pesticides, e.g., DDT, dieldrin, chlordane, may be present in shallow soils.	P328-189
	Appendix H	Appendix F	**Discrepancies Between Owner Questionnaire and Site Observations Made by AES.** An environmental questionnaire reportedly completed by the current ranch manager of the Subject Property is contained within Appendix F of the Phase I ESA report. The answers to the questionnaire indicate that there are no chemical containers or above ground storage tanks located on the Subject Property. This is directly contrary to the site observations made by AES during the site visit in which chemical containers and petroleum storage tanks were observed on the Subject Property. A discussion of these discrepancies, and possibly a discussion of the reliability of the responses to the questionnaire, should have been included in the Phase I ESA report.	P328-190

Broussard, Chad <chad.broussard@bia.gov>

Comments to Environmental Assessment for Camp 4 Fee to Trust, Santa Barbara County,

1 message

Klaus Brown <klausbrownsyv@yahoo.com> Mon, Oct 7, 2013 at 12:11 PM
Reply-To: Klaus Brown <klausbrownsyv@yahoo.com>
To: Amy Dutschke <amy.dutschke@bia.gov>, "chad.broussard@bia.gov" <chad.broussard@bia.gov>
Cc: Devin Reinerson <devin_rhinerson@feinstein.senate.gov>, Aaron Shapiro <aaron.shapiro@mail.house.gov>, "dfarr@countyofsb.org" <dfarr@countyofsb.org>

Amy Dutschke October 7, 2013

Regional Director

Bureau of Indian Affairs, Pacific Region

2800 Cottage Way

Sacramento, CA 95825

Subject: Comments on Environment Assessment

Santa Ynez Band of Chumash Indians

Camp 4 Fee to Trust, dated August 2013

Santa Barbara County

Sent via email, fax or US Mail (as indicated below)

Ms. Dutschke,

My name is Klaus M. Brown. My wife Lois and I reside at 5465 Baseline Ave, Santa Ynez, CA, 93460, in Rancho Estates. Our home is in a rural residential area and is located within about one mile of the 1433 acre Camp 4 fee to trust area and well as within the area described as the Chumash Tribal Consolidation Area (TCA). P329-01

We believe there will be negative impacts to this rural area by both the Camp 4 and TCA actions. We have many substantial concerns, comments and questions regarding the subject Environment Assessment (EA) that require further review and correction on the part of the appropriate parties. We have read the entire EA and believe it is inadequate and unsuitable for the intended propose of understanding and evaluating the environmental impacts of this development project. The EA for P329-02

the Camp 4 project raises many environmental concerns regarding the construction of 143 single family residences ranging between 3000 to 5000 sf over an estimate 4 to 9 years as well as other unidentified potential economic development. The addition of 143 residences represents a more than doubling of the number of houses along Armour Ranch Road and Baseline Ave, with the resultant traffic, noise, and visual impairment. P329-02 Cont.

The points made below apply to both Alt A and Alt B, as described in the EA. Further, we believe it is more appropriate that an Environment Impact Statement be filed by the Chumash Tribe in accordance with NEPA. P329-03

1. **General Comments:** The actual process was and is flawed because there were no public meetings in which the public was notified that there was an environmental permitting process in progress for Camp 4, much less the TCA. I attended the meeting hosted by the Chumash on 21 Jan 2013 and have a copy of the handout (see Appendix N). There is no notice of a permitting process underway or that this meeting was intended as part of an EA or EIS. As a resident in the proximate area, we could be negatively impacted by the change in land use from agriculture to housing and other development. The development plan presented in the EA is not consistent with the Santa Ynez Valley Community Plan and the Santa Barbara zoning adopted for the Camp 4 and nearby areas (AG-II-100). The SYV Community Plan was adopted in 2009, including a sign-off by the Tribe. In general, there has been a lack of communication, transparency, and openness with local residents, agencies, and government. P329-04

2. **Economic Development** -- On page 2-4, the following representation is made: No gaming would occur on the subject property. The Chumash have written that federal rules would prevent the construction of a gaming facility on Camp 4. However, the EA does not detail how federal rules apply in such a case. The Chumash obtained 2 gaming permits....they have used only one to date. It would be negligent for the review of the EA to ignore the potential construction of a casino on Camp 4/TCA land. Other economic development concepts are only vaguely addressed in the EA. Those that are now, are mostly agricultural in type. The Camp 4 land is presently being used for agricultural purposes (vineyards and cattle grazing) which are already permitted within the County land use plan. It hardly seems necessary to take Camp 4 into trust for these same agricultural uses. Therefore, there is a concern that the economic development must be some other type which may not be compatible with current County or Santa Ynez Valley land use planning. The environmental process needs to have a more fully developed economic development plan from the Tribe. P329-05

3. **Public Safety and Public Services** -- The project will place an unreasonable burden on local infrastructure, remove the land from County and State rules regarding land use, and reduce tax revenue for all levels of government, yet be a drag on services provided by those governments. On pages 2-6/7, the following is stated: The County, Solvang/Santa Ynez Sheriff P329-06

Substation provides general public safety and law enforcement service for the project area. The Sheriff Substation is located in Solvang, approximately three miles from the project site. It provides 24-hour service to the Santa Ynez Valley and Solvang area. The County Fire Department (Fire Department) provides structural fire protection services to the project area. The Fire Department protects primarily residential areas, and responds to calls for structural fires as well as medical emergencies. P329-06 Cont.

The Chumash would be willing to pay $10 Million to compensate the County for the loss of tax revenue from Camp 4. The $10 Million in no way provides adequate compensation for in-perpetuity loss of tax revenues if the economic development and housing on 1,400 acres is taken in Trust, let alone addresses the significant new demands the existing County law enforcement and fire services that would result from the proposed development of this now virtually undeveloped pristine land.

4. **Roads, Traffic, Grading, and Drainage** – Sections 3.7 and 4.1.7 and Appendices D and I focus on the impact of the project on roads, traffic, grading and drainage. The following is stated: Existing access roads would be improved and new roads constructed to provide access to the proposed residences and existing agricultural operations. The EA does not adequately address to the impact of the additional traffic on Baseline Ave, Armour Ranch Road, SR 154 and SR 246 that would result from the stated proposed development of Camp 4, let alone the potential development that is NOT addressed but reasonably anticipated to fulfill the economic opportunities the Chumash have stated will be provided to allow "the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises." (Page 1-7). The Level of Service on the impacted roads and intersections will be worse than indicated in the EA because the traffic study underestimates the volume of traffic caused by construction, increased population, and the 100 tribal events. Also, the City of Solvang stated at its council meeting on 30 Sept that the traffic circle contemplated by Caltrans at the SR 154/246 intersection would not be built. It is unknown if a typical signaled intersection, which Caltrans did not prefer for this location, would be adequate to safely handle the added traffic caused by the proposed development. P329-07

Both Alt A and Alt B show access from Baseline Ave and Armour Ranch Road, both Santa Barbara County roads. These rural county roads are narrow, lack paved shoulders, and some areas either have blind corners or blind crests. They also experience much use by bicycle tour groups and other casual riders, joggers, and horseback riders. The existing county roads are not suited to the substantial increase in traffic during construction and later from the added residents and other facilities that are intended to be built on Camp 4 (80,000 sf of tribal facilities, for example).

The construction of 143 residences, tribal facilities, wastewater treatment plant and 40,000 lf of sewer system, 400 parking spaces, drinking water system, and new roadways will P329-08

require grading and moving some 180,000 cy of cut and 190,000 cy of fill with cut and fill depths up to 20 feet within the site. There will be importation of significant quantities of construction materials to the site on the existing roads. According to AASHTO, a loaded truck trip can cause as much damage as up 10,000 car trips. The EA indicates up 100 events annually with up to 1000 visitors each at the tribal facilities. These trips are not counted in the number of trips on the local state and county roads regarding impact on Level of Service on those roads or at the various intersections as well as the impact on the surrounding properties.

P329-08 Cont.

The EA fails to include line and grade drawings for the new internal roads, therefore it is not possible to evaluate the validity of the cut/fill figures. Appendix I contains a table listing the new roadways and showing grades up to 14.4%, and many grades of 9 and 10%, which could be unsuitable for emergency vehicles including fire trucks. Alt B shows 194 acres for home sites and roads, or about 10,000 cy of excavation per acre, which appears excessive, given the professed mitigation measures proposed in the EA.

5. **Wildlife, Trees, and Wetlands** – On page 2-16 the following is stated: "Impacts to biological resources would be greater under Alternative A due to the size of the assignments. Under Alternative A, approximately 330.11 acres of critical habitat for a protected species would be removed from designation. Under Alternative B, approximately 65.28 acres of the critical habitat would be removed from designation. Both alternatives would adversely impact water of the U.S., special-status species, protected oak trees, and migratory birds without the implementation of mitigation."

The Chumash concede that their proposed developments for Camp 4 adversely impact biological resources, protected species, protected trees and migratory birds. It is your obligation to determine, as a finding of fact, that the proposed development of Camp 4 leading to these adverse consequences to the habitat.

P329-09

State and local laws have been enacted specifically to protect wetland areas and California Live Oak for the enjoyment of OUR future generations. On page 2-10, the following is stated: "All identified wetland areas and California Live Oak would be avoided to the maximum extent feasible." The term "feasible" is subjective. The alternatives A and B would require the removal of between 50 and 70 mature oak trees, a significant number of the trees on Camp 4. The remedial measures proposed for the removal of these protected oak trees are inadequate as such mature trees cannot be replaced. The proposed project will adversely affect jurisdictional waters of the United States, as defined by Section 404 of the Clean Water Act, through the fill of at least 2.2 acres of ephemeral drainages and seasonal wetlands thereby forever changing the contour and drainage in the area. The wetlands remedial measures are inadequate and require further study. In addition, the noise and increased human activity for tree removal and housing construction will disturb nesting sites

for migratory birds and birds of prey. This development activity will also have a negative impact on the nearby properties outside of Camp 4. We have observed and talked to local bird watching groups along Armour Ranch Road watching various rare species of birds on Camp 4. These bird groups should be contacted to determine which birds are present. The remedial measures for all wildlife requires more study. P329-09 Cont.

6. **Tribal Facilities** -- On page 2-12, the following is stated: "The tribal facilities would include development of a banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, and a tribal community space including ceremony room and gymnasium...Approximately 400 parking spaces would be provided for the facilities.".

EA does not address the environmental impact, let alone the broader community impact, of the use of a facility on Camp 4 that necessitates 400 parking spaces. The proposed "community event facilities are stated to encompass nearly 80,000 square feet. (page 2-14). Santa Ynez Valley residents already are gravely concerned about and pursuing laws to regulate and restrict the number of special events that may be hosted at wineries and other privately owned facilities due to the traffic, light and sound pollution, and other negative impacts caused by these events. P329-10

7. **Socioeconomic Conditions and Environment Justice** -- On page 2-16, the following is stated: **"No adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative..."**

This is a broad conclusion...not a statement of fact. Please review Alternative A and Alternative B against the background of the Santa Ynez Valley Community Plan. P329-11

8. **Land Use** -- There is the issue that once taken into trust, Camp 4 would no longer be subject to local land use procedures by which all other County residents must abide. On page 4-69, the following is stated: **"A project that would induce disorderly growth (i.e., would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts."** The County has spoken to what is deemed to be "orderly growth". This statement is incorporated in the Santa Ynez Valley Community Plan adopted in 2009. Neither Alternative A nor Alternative B are incorporated in the county's vision of orderly growth. It is difficult to fully address or evaluate the EA as it is not clear what is actually being proposed or what will be constructed, Alt A or Alt B, or other facilities for economic development. P329-12

The current 138 acre reservation contains 97 units of housing, some of which may not be occupied. Section 1.3 states only 17% of the tribal members live on the reservation today. It is apparent the other 83% have found suitable and affordable housing in the nearby P329-13

community. The EA does not demonstrate if the Tribe spent the same dollars (the several hundred million dollars they plan to spend developing Camp 4) on developing additional housing on the remaining land on the reservation, or upgrading current housing, or finding/upgrading other housing in the community that it could not provide the housing the Tribe seeks. The EA does not address that if 143 new units are built on Camp 4, that tribal members are committed to occupy any or all of the new units. The EA also states that units on the current reservation will continue to be assigned as they are today, even if those units are unoccupied. All this seems to indicate, that developing Camp 4 with 143 new housing units is not the only solution.

P329-13 Cont.

The EA states the Tribe intends to use Camp 4 to reach "economic self-sufficiency through diversified tribal governed enterprises". They intend the keep 300 acres for vineyards. EA does not describe a plan on how the remaining undeveloped land will be used for economic activity other than the vineyard and housing. Thus, the future growth could include land uses incompatible with the surrounding area as well as with tribal residents. Since the economic growth plan is undefined, it is not possible to determine either short-term or long term cumulative impacts, thus making the EA flawed, unsuited, and incomplete.

P329-14

9. **Mitigation Measures** -- On the same page (4-69) the following is stated: "No significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B." Please exercise due diligence on the part of the BIA and do not merely adopt these conclusions. The term "significant" is highly subjective, and it is extremely important to non-Chumash members of this community that any development of Camp 4 have minimal detrimental impacts on our use and enjoyment of our homes.

P329-15

10. **Water and Waste Water Treatment** -- On page 2-3, the EA describes a plan to provide a waste water treatment plant on the project. Camp 4 sits atop the aquifer that supports a significant portion of Santa Ynez Valley. Who would represent the entire valley population that relies on that water in terms of oversight of the proposed Chumash waste water treatment? On page 2-7, the following is stated: To meet increased demands, the Tribe would develop an on-site water supply system using groundwater. The EA states 380 acre ft per year of groundwater will be taken from existing and two new wells. The EA also states in Section 4.1 that the local aquifer is already in overdraft by some 2000 acre ft per year and could alter pumping patterns throughout the County. Therefore the proposed groundwater plan contributes the problem with vague and incomplete mitigation measures. There is no information as to how the potential increased demand, let alone the stated increased demand will impact all of the existing and future needs of all of the populations who are dependent upon the aquifer. The WWTP will be situated above the groundwater aquifer. Appendix C bases the sizing of the WWTP on an average 3.5 persons per house, about 500 people. This figure does not appear to be consistent with the stated goal of providing housing for all the

P329-16

tribal members now (some 1500) or in the future. This 500 figure is also inconsistent with the traffic study in Appendix I.

P329-16 Cont.

11. **Alternative Evaluation and Process** – in Section 2.1, the EA endeavors to make a case for only evaluating Alt. A and Alt. B. It is a very weak case because it puts the cart before the horse. The Tribe purchased the Camp 4 (at a cost of $40 million) in 2010 and embarked on an off-reservation fee to trust initiative, at least 2 years before getting approval of the TCA that includes Camp 4. Then, the EA states "lands outside the Tribe's TCA would not meet the purpose and need and would constitute on off-reservation trust acquisition", thus were not evaluated, when "off-reservation" is exactly where the Tribe began with Camp 4. Therefore, the Tribe was and is in a position to evaluate off-reservation sites and should this be a requirement of any environmental permitting process by the BIA. The BIA has the obligation to evaluate all reasonable alternatives and discuss its reasoning. Alt A and Alt B in the EA do not facilitate this review and evaluation process. Environmental alternatives must also consider if the stated purpose and need goals in the EA could be accomplished at another location outside Camp 4 or the TCA, or on a more limited site within Camp 4, or the "no build" outcome.

P329-17

12. **Tribal Consolidation Area** – This EA is submitted under the umbrella of the BIA's recently approved TCA. The TCA map shown in Fig 1.2 of the EA is seriously flawed because it does not show the existing property lines for 654 current property owners within the TCA outline. EA is incomplete because it fails to address the cumulative impacts on these property owners. Since the TCA is being appealed by Santa Barbara County and several other local citizen groups, the TCA process and approval is in question. This EA should not move forward until there has been a full review of the TCA process.

P329-18

13. **Consultation with Agencies** – Section 6 contains the list of the handful of public agencies contacted during the course of the preparation of the EA. Key agencies not contacted include the Corps of Engineers, Caltrans, Santa Barbara Police and Fire, Solvang Police and Fire, Fish and Wildlife agencies, and the Santa Barbara Planning Dept (the only listed contact with SBPD is for the non-renewal of the Williamson Act contract). Lack of communication with these omitted agencies leaves a large whole in the input, documentation, evaluation those agencies could provide. Therefore, the EA is incomplete.

P329-19

Before any consideration is given to the application for Camp 4 to be placed into federal trust, all the environmental impacts should be addressed in an Environmental Impact Statement, not an EA. The focus of such a vast square footage of new housing, roads, tribal

P329-20

facilities, and other facilities in an area that has been and still is agricultural and rural will have a major impact on the proposed site as well as the surrounding area, neighbors, and wildlife. An EA is insufficient for the purpose of determining cumulative impacts.

P329-20 Cont.

Respectfully

Klaus M. Brown Lois S. Brown

CC:

U.S Congresswoman Lois Capps

California Senator Dianne Feinstein

California Senator Barbara Boxer

California Governor Jerry Brown

S.B County Supervisor Doreen Farr

Chad Broussard, Environmental Protection Specialist, BIA, Pacific Region

Santa Ynez Valley Concern Citizens

Comment Letter P330

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P280.

Broussard, Chad <chad.broussard@bia.gov>

FW: Santa Ynez camp 4

1 message

Amy Dutschke <amy.dutschke@bia.gov> Tue, Oct 8, 2013 at 2:41 PM
To: Chad Broussard <chad.broussard@bia.gov>, John Rydzik <john.rydzik@bia.gov>

—Original Message—
From: Steve W wood [mailto:stevewwood@hughes.net]
Sent: Thursday, October 03, 2013 5:38 PM
To: amy.dutschke@bia.gov
Cc: dfam@countyofsb.org
Subject: Santa Ynez camp 4

Dear Amy Dutschke, the list of reasons to deny approval of the 1400 acres to fee-to-trust in Santa Ynez is long and should be recognized. If there is approval, why have rules and guidelines? A civilized government must have rules and guidelines that can be trusted by the citizens. It should be an easy decision to deny this request. The good news, the Chumash already own this 1400 acres and can develop the property as any American citizen, "as they are". They are a very wealthy tribe and should be enjoying this country as stand-up American citizens. Hoping you agree.

P331-01

Steve Wood

Broussard, Chad <chad.broussard@bia.gov>

Letter of comment FTT Santa Ynez Band of Chumash -- 1400 ac. Camp 4

1 message

Cheryl Schmit <cherylschmit@att.net> Wed, Oct 16, 2013 at 10:43 PM
To: amy.dutschke@bia.gov, chad.broussard@bia.gov, "Rydzik, John" <john.rydzik@bia.gov>, Arvada Wolfin <Arvada.Wolfin@bia.gov>

Please find attached the letter of comment by Stand Up For California on the Santa Ynez Band of Chumash Mission Indians for the Fee to Trust acquisition of aprox. 1400 ac. or 5 parcels known as Camp 4 . P332-01

Cheryl Schmit, Director

Stand Up For California

916 663 3207

cherylschmit@att.net

www.standupca.org

ltr comment Santa Ynez Band of Mission Indians 1400 AC FTT.pdf
7919K

Stand Up For California!
"Citizens making a difference"

www.standupca.org

P. O. Box 355
Penryn, CA. 95663

October 17, 2013

Amy Dutschke, Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way, Room W-2820
Sacramento, CA. 95826
Fax: 916 978 6099

RE: Santa Ynez Band of Mission Indians of the Santa Ynez Reservation
Fee to Trust Land Acquisition Application for 1,427.78[1] Acres

Dear Regional Director Dutschke,

Stand Up For California submits this letter of comment to be included in the administrative record for the proposed Fee-to-Trust Application of the Santa Ynez Band of Mission Indians for 1,427.78 acres in Santa Ynez California.

The Santa Ynez Band of Mission Indians (Chumash/Tribe) has requested the Bureau of Indian Affairs (BIA) take approximately 1,427.78 acres into trust. In addition to the comments Stand Up For California has already submitted, we wish to adopt and incorporate, by this reference, the comments submitted by the County of Santa Barbara on October 7, 2013, with respect to the Environmental Assessment (EA) for the proposed acquisition. These comments are important and should be fully addressed when evaluating the EA and considering the Chumash application. P332-02

Stand Up For California will address each of the criteria in 25 Code of Federal Regulations Part 151.10 and 151.11.

I. The factors listed in 25 Code of Federal Regulations (C.F.R.) Part 151

The Chumash Fee-to-Trust Application does not fully address, or adhere to, all the factors in 25 P332-03

[1] **The Chumash EA states 1,433 acres, and the Application recites 1,427.78 acres –this inconsistency must be rectified.**

C.F.R. Part 151 which are the regulations that govern fee to trust applications and specify the factors that must be considered by the Department of the Interior. Further this application is inconsistent with the purposes of 25 U.S.C. 465. Section 465 was intended to restore tribal land lost through the federal allotment process and to allow for the acquisition of land in trust until such time as a tribe had sufficient land to be economically self-sufficient. In this case, the acquisition does not constitute land lost to the Chumash through the federal government's allotment process.

P332-03 (Cont.)

The Chumash exemplify the intended success of California's Proposition 1A passed in 2000 to provide a monopoly on casino style gaming that would generate revenue for tribal governments and raise the standard of living for all tribal members. The Tribe has purchased a number of other properties in the Santa Ynez Area and is a successful business model. The Chumash with its current land base and additional fee lands have achieved a diversified economic self-sufficiency!

On June 17, 2013, the Pacific Regional Office of the Bureau of Indian Affairs approved without notice to affected private property owners or affected local governments a Tribal Consolidation Plan (TCA). The TCA administratively creates what amounts to a claim of aboriginal lands or restored lands for the Chumash. The proposed trust acquisition encompasses 1,427.78 acres located east of Route 154 and north of Armour Ranch Road within a TCA in an unincorporated area of Santa Barbara County. ***The TCA destabilizes the social, cultural, political and economic systems of the entire region.***

The Chumash and the *BIA are asserting this is an On Reservation acquisition.* There is no statutory or regulatory law, no congressional act or stipulated judgment that supports this to be processed as an On Reservation acquisition. ***Section 2.1 of the EA specifically states that the fee to trust acquisition located within the TCA is to be considered an On Reservation acquisition and processed under 25 CFR 151.10.***[2] ***The Application at page 6 of 16 cites, "Thus, the preservation of the tribe's existing land base and the re-acquisition of its traditional lands have always been top philosophical priorities".*** **This is NOT a re-acquisition of former reservation lands, or lands that can demonstrate former Indian title. These are lands 1.6+ miles from the Reservation which was established December 1901 for the Tribe. There are no viable aboriginal land claims in California.**

P332-04

Stand Up For California respectfully requests the immediate denial of this application or re-submission of an amended application properly identifying the acquisition as an ***off reservation*** acquisition processed under 25 CFR 151.11.

25 CFR 151.11 Off Reservation: considers the factors for an On Reservation acquisition 25 CFR 151.10 (a) – (c) and (e) – (h). However an off reservation acquisition requires the Secretary to evaluate additional criteria when the request for land is located outside of the reservation or is noncontiguous to the tribe's reservation and the acquisition is not mandated. Mr. Sam Cohen the Chumash Legal and Governmental Affairs Consultant has been quoted in the press as stating the

[2] Page 2-1 of the EA: "There are no other available comparable lands that would provide sufficient land base to the Tribe's Tribal Consolidation Area. In addition lands outside of the TCA would not meet the purposes and would constitute an Off Reservation trust acquisition request."

TCA is a ***"concept"*** and does not cloud the title of the lands. ***Clearly, a concept is not a mandate for an On Reservation acquisition.***

151.1 (b) Off Reservation: Requires the distance from the boundaries of the tribe's reservation shall be considered as follows, ***"as the distance between the tribe's reservation and the land to be acquired increases, the Secretary shall give greater scrutiny to the tribe's justification of anticipated benefits from the acquisition ."*** Further, that: ***"The Secretary shall give greater weight to the concerns raised by local government".*** The proposed acquisition of Camp 4 parcels is 1.6+ miles from the reservation boundary. It is noncontiguous.

Stand Up For California suggests it is reasonable to assert the concerns of the local affected private property owners in the area as well as the regional area, all stakeholders ***must be considered equally*** along with affected local government since the *Patchak Ruling* by the United States Supreme Court.

P332-04 (Cont.)

151.11 (c) Off Reservation: Where land is being acquired for business purposes, the tribe shall provide a plan which specifies the anticipated economic benefits associated with the proposed use. The Chumash have not provided a detailed comprehensive economic business plan demonstrating the economic benefits associated with this proposed acquisition. The Chumash EA states at 1-7 of the Introduction; ***"Secondarily, the trust acquisition of the proposed trust land would also allow full tribal governance over its existing agricultural operations on the property; thereby allowing the Tribe to continue to build economic self-sufficiency through diversified tribally governed commercial enterprises".*** (Emphasis added)

P332-05

The application states and restates over-and-over; the intent is to eliminate the jurisdictional authority of the County of Santa Barbara and the State of California over the 5 parcels known as Camp 4. Here again, this phrase of ***"tribally governed commercial enterprises"*** and a goal to remove the authority and jurisdiction of both the State and the County raises a red flag. Off reservation acquisitions for gaming must be reviewed through a stringent two part determination process and require the concurrence of the Governor of the State. Paring this phrase with terms in the Chumash Cooperative Agreement offered to the County which includes in lieu of taxes in section III using Special Distribution Funds[3] leads to heighten concerns about a land use that includes gaming.

P332-06

II. 25 C.F.R. 151.10 – On Reservation (a) the existence of statutory authority for the acquisition and any limitations contained in such authority;

The BIA and the Chumash assert in the EA and Fee-to-Trust Application that the Camp 4 parcels are to be processed as an On Reservation acquisition. An On Reservation acquisition because of the approved Tribal Consolidation Area (TCA) must be considered a ***"On Reservation acquisition".*** An "On Reservation acquisition" gives very little consideration to the comments of affected local government and little if any to affected citizens. The only consideration that affected community members may receive is through a judicial review of the fee to trust transaction.

P332-07

[3] SDF funds can only be used to mitigate gaming impacts.

The BIA has approved the first ever TCA in California. The BIA is using the On Reservation regulation 151.10 for the Chumash acquisition of lands within the TCA. Arguably the Camp 4 parcels may meet an exception under Section 20 of the Indian Gaming Regulatory Act (IGRA) (U.S. C. 2719 (a) (1). This transaction becomes a major federal action and requires an Environmental Impact Statement (EIS). The Chumash must comply with the IGRA and its 1999 Tribal State Compact. This application cannot move forward until a complete EIS is prepared and recirculated. *Since the BIA is obligated to accommodate tribes, it would be wise to have an independent 3rd party be appointed as the lead agency managing the National Environmental Protection Act (NEPA) process. This will assure all affected parties a fair, objective and transparent process.*

P332-07 (Cont.)

The Chumash 1999 Tribal State Compact is potentially affected by the On Reservation acquisition within the TCA. The Tribe in the EA has stated its plans to create an **event center.** The EA ambiguously states that the event center will hold 100 events per year and accommodate 1000 persons. This equates to, two events per weekend year round. This raises a number of unanswered questions which heighten public concern and simultaneously ignores terms of the 1999 Tribal State Compact. Will events at the center be ancillary to the Tribes established casino? Will events at the center provide for overflow casino crowds, poker tournaments, high stakes bingo galas, or a ***satellite gaming facility***[4] ?

The Chumash Tribal State Compact permits a second casino or a "gaming facility". (Section 4.2)[5] Part of this land acquisition is a prime location for a casino ancillary development such as a hotel/spa/golf course complex.

P332-08

The proposed event center could potentially be used in accordance with the 1999 Tribal State Compact as a weekend gaming center (*"...any building in which class III gaming activities or gaming operations occur,...)* Chairman Armenta has passionately stated that there will be no *second casino*, but he has not stated that there will be no gaming whatsoever at the Camp 4 location.

The 1999 Tribal State Compact[6] (section 4.2) stipulates that land must meet the standards of *"Indian lands"* under IGRA. *Do the lands within the TCA meet the IGRA threshold for gaming? This question must be answered.* It does not matter that the Chumash have stated that this is a non-gaming acquisition. The Tribe's 1999 Tribal State Compact imposes a requirement

[4] **Sec.2.8** "Gaming Facility" or "facility" as defined at Section 4.2 of this Compact means **any building in which Class III gaming activities or gaming operations occur,** or in which the business records, receipts, or other funds of the gaming operation are maintained but excluding offsite facilities primarily dedicated to storage of those records, and financial institutions, and all rooms, building, and areas including (but not limited to) parking lots and walkways, **a principal purpose of which is to serve the activities of the Gaming Operation, provided that nothing herein prevents the conduct of Class II gaming (as defined under IGRA) there in. (Emphasis added)**

[5] **Sec. 4.2** Authorized Gaming Facilities. The Tribe may establish and operate not more than two Gaming Facilities, and only on those **Indian lands on which gaming may lawfully be conducted under the Indian Gaming Regulatory Act.** The Tribe may combine and operate in each Gaming Facility any forms and kinds of gaming permitted under law, except to the extent limited under IGRA, this Compact, or the Tribe's Gaming Ordinance.

[6] The 1999 Tribal State Compact expires in 2020 leaving approximately 6+ years. Tribes with 1999 Tribal State Compacts are currently in compact discussions/negotiations with the Governor's office. Terms of a new or amended compact have the potential to affect the Camp 4 Fee to Trust acquisition and its intended land use.

(Section 2.8) that the Fee-to-Trust Application be treated as a gaming application should these lands be determined eligible for gaming. This includes ancillary commercial developments that support or enhance the Tribes established casino operation.

P332-08 (Cont.)

The BIA has ignored the statutory limitations of 25 USC 465 and 25 CFR 151.11. The Chumash were not affected by the Dawes Act. The Chumash Reservation was not created until December of 1901.

P332-09

Further, the BIA in its creation of a TCA and asserted On Reservation acquisition of Camp 4 parcels has ignored the statutory limitations of the Consolidation Statute that addresses only the sale of Indian lands within the exterior boundaries of a reservation.

P332-10

And lastly, the BIA and the Chumash have ignored the statutory limitations of the California Land Commissions Act of 1851. The 1851 Act created a Board of Commissioners to determine the validity of all land claims, and it required every person including Indians "claiming lands in California by virtue of any right to title derived from the Spanish or Mexican government" to present the claim within two years. Any land not claimed within two years, and any land for which a claim was finally rejected was to be deemed "part of the public domain of the United States.". The Chumash and the BIA have missed the deadline for a land claim by 160 years. ***Development of the TCA is an abuse of the Regional Directors authority. Any decision to approve a fee to trust within the TCA creates irreparable harm.***

P332-11

III. 25 C.F.R.151.10 On Reservation (b) the "need" of the individual Indian or the tribe for additional lands:

The Chumash application is absent a showing of *"immediate need"* or *"necessity"*. The Chumash are confusing its desire to ***bank land*** with the actual need for the protections afforded tribes by trust status. The Chumash have not stated a clear economic benefit for acquiring ***all*** 1427.78 acres of land in trust. Nor has the Chumash clearly defined any economic benefit of the ambiguous event center. The Chumash purchased this land on the open market and have exercised successful economic control over this land and many other fee land purchases in Santa Ynez for a number of years. The Chumash have achieved sustained economic self-determination.

P332-12

The taking of this land into trust creates many negative impacts on the existing social-cultural, political and economic systems of the regional area. Citizens of the community lose control over the allowable developments of this land. Local government will lose ability to control developments significantly affecting its ability to protect the shared natural resources and the interests of the citizens that support it. The loss of this land is loss of taxable revenue that will be borne on the backs of all Santa Barbara County taxpayers, businesses, school districts, public safety and social services because the County of Santa Barbara must balance its budget. The proposed Cooperative Agreement offered by the Chumash does not wholly or fully address the economic impact to the County of Santa Barbara and all of its citizens through perpetuity.

P3323-13

The proposed use of open space and 143 homes has the potential of being worked out with the County of Santa Barbara and its Planning Department. The Tribe by holding the land in fee and

P332-14

developing it contributes to the strength of the local community as well as to the Tribe. The Tribe has not demonstrated that trust conveyance is necessary to facilitate tribal self-determination nor that the need of the land meets the statutory standards of 25 U.S.C. 465.

P332-14 (Cont.)

All Tribes are encouraged to strive for the greatest possible economic success. However the trust provisions of the Indian Reorganization Act (IRA) were not designed to subsidize tribes forever. Rather the IRA intent was to provide a secure foundation from which tribal sovereigns could grow and achieve economic self-governance. The Chumash have achieved economic self-determination as evidenced by its being a major employer in the Santa Ynez Valley, a major land owner, a generous charitable contributor and an influential political player in local, state and federal politics.

P332-15

Consequently any approval to acquire the land in trust would constitute an arbitrary and capricious action subject to judicial invalidation.

IV. 25 C.F.R. 151.10 On Reservation (c) The purposes for which the land will be used;

The Chumash first stated purpose for the additional 1,427.78 acres (5 parcels) to be taken into trust is for an additional 143 homes. Per the Chumash application there are 136 tribal members and 1300 lineal descendants. The Tribe in the EA has also stated their plans to create an event center. The event center will hold 100 events per year and accommodate 1000 persons. But the EA did not state the purpose or nature of the events. The Chumash application states that the trust acquisition of the proposed trust land would allow the Tribe to continue to build economic self-sufficiency through diversified tribally governed commercial enterprises". (Emphasis added) The Chumash have not clearly articulated what "*diversified tribally governed commercial enterprises*" it has in mind.

In a recent article posted in the Santa Maria Times, October 8, 2013 by Len Wood, *Extension granted for Camp 4 trust application comments*, Tribal Officials are attributed with stating;

> "Any construction on Camp 4 would be subject to rules and review by the U.S. Environmental Protection Agency and the Army Corps of Engineers. Oversight for development would be by the BIA in accordance with the National Environmental Policy Act, tribal officials said."

P332-16

This statement raises a number of red flags and questions that were not answered in the EA or the Application. The involvement of the EPA or Army Corps of Engineers suggests the need for approval of leasing under 25 CFR 162 or approvals under section 404 of the Clean Water Act.

- Is the Tribe planning to lease these 2.5 or 5 acres ranch homes to its 136 members or as a commercial venture to non-tribal citizens?
- Can tribal members who enter a lease then sub-lease these homes to non-tribal members or to tribal family members?
- Will the Tribe ensure that leases to non-Indians pay Possessory Interest taxes to the County of Santa Barbara?
- Will the Tribe lease to a major hotel or shopping mall chain for development of a

commercial facility after the land is in trust?

- Will the proposed event center be leased to a gaming contractor or slot contractor, internet gaming contractor?
- Is the Tribe planning on filling in a wetland or land that has been defined by the EPA as a navigable waterway of the U.S.?
- Is the Tribe planning on the development of another gas station with underground tanks that may affect a wetlands area? Will this be a new pump and play?

P332-16 (Cont.)

The Chumash Fee-to-Trust Application like the EA fails to disclose the total purpose for which this land will be used.

V. 25 C.F.R. 151.10 On Reservation (d) If the land is to be acquired for an individual Indian, the amount of trust or restricted land already owned by or for that individual and the degree to which he needs assistance in handling his affairs.

P332-17

The Fee-to-Trust Application is for the benefit of the tribal government of the Chumash. It is uncertain if any of the nearby or adjacent land or other lands in the valley are currently owned by individual Indians. The Chumash should confirm that it isn't, and identify all of the fee land owned by individual Indian members in the Santa Ynez Valley.

VI. 25 C.F.R. 151.10 On Reservation (e) If the land to be acquired is in unrestricted fee status, the impact on the State and its political subdivision resulting from the removal of the land from the tax rolls.

P332-18

The State of California has 110 Indian tribal governments and 78[7] additional tribal groups seeking federal recognition. If the Chumash are permitted to acquire land in trust when it has no immediate need for the land, other tribes throughout the state will claim entitlement to the same treatment by the Department of the Interior pursuant to the provisions of 25 USC section 476 subdivisions (f) and (g) which provide that no agency of the United States shall make a determination under the Indian Reorganization Act (IRA) that *"classifies, enhances, or diminishes the privileges and immunities available to an Indian tribe relative to other federally recognized tribes by virtues of their status as Indian tribes"*

Unlimited fee to trust acquisitions by tribes that have no *immediate need* for additional land or seek to acquire land when no land was lost due to the Dawes Act, constitutes federal interference with the powers reserved to the State in a manner patently at odds with the intent of the Tenth Amendment. The State's loss over land use and taxation, two fundamental attributes of its sovereignty has a serious negative generational impact on the non-tribal citizens of California.

P332-19

Moreover, Santa Barbara County's comments make clear there is a tremendous tax implications for county taxpayers should this property be taken into trust. The proposed Cooperative Agreement only takes into consideration the current assessed value of the property in calculating

[7] While the Office of Acknowledgement lists 78 groups several of the petitions for federal recognition have been denied, or Indian groups have been joined with established tribes or the Asst. Secretary has without congressional authority administratively recognized a group as a tribal sovereign. Approximately 69 groups are still petitioning for recognition.

the tax loses to the County and then only for a fixed number of years. Santa Ynez Valley residents have already experienced the negative impacts of on reservation developments that affect the off reservation community throughout the Valley. The Cooperative Agreement offered by the Chumash to the County of Santa Barbara ends in ten years and does not consider the ongoing impacts.

P332-19 (Cont.)

Placing the additional land into trust creates reduction in tax revenue for the Santa Ynez community as well as the local School District and other social services. Please see the County of Santa Barbara letter of Comment on the EA. Serious impacts to the School District have not been addressed.

VII. 25 C.F.R. 151.10 On Reservation (f) Jurisdictional problems and potential conflicts of land use which may arise;

The Chumash through open market purchases has regain control over the development on these lands, however transferring this land from fee to trust grants the Chumash governmental control over these lands. This creates a disruptive and practical consequence to the surrounding areas which are populated by non-Indians. Transferring these lands into trust creates a mix of state and tribal jurisdictions which burden the administration of state and local governments and adversely affects the private property of landowners neighboring the tribal lands. Any claim by the Chumash that jurisdictional issues have been resolved is belied by the lack of mutually beneficial agreements with affected governmental or public entities. Jurisdiction issues remain until there is a comprehensive mutually beneficial agreement that wholly and fully addresses the concerns of the County of Santa Barbara and the Santa Ynez Valley residents. Any agreement must consider and address the impacts that the Chumash Casino has already created in the Valley.

P332-20

It is without dispute that California's criminal law is fully enforceable in Indian Country granting California Sheriffs both the authority and the obligation to protect Indian and non-Indians from criminals on California's Reservation and Rancherias. At the same time, California Indian governments have a federal status that presents a number of gray areas to members of law enforcement in the exercise of this obligation.

P332-21

In 2010, President Obama signed into law the Tribal law and Order Act, tribes can now petition for the federal government to have concurrent jurisdiction with the state. Tribes can employ their own Federal Law Enforcement Officers with tribal and federal authority on the reservation and limited federal authority off-reservation. This includes limited authority over non-Indian citizens.

- Has a memorandum of understanding between the County Sheriff and the Chumash been developed to address jurisdictional issues related to law enforcement protocols and investigative procedures as well as a memorandum that considers concurrent jurisdiction with federal authorities?
- Is there a memorandum of understanding with the District Attorney's Office?

P332-22

VIII. 25 C.F.R. 151.10 On Reservation (g) If the land to be acquired is in fee status, whether the Bureau of Indian Affairs is equipped to discharge the additional responsibilities resulting from the acquisition of the land in trust status.

The property that the Chumash have proposed for trust status is in fee status. There are several easements and public rights on the properties that were specifically identified in the application. Also the Notice of Land Acquisition Application included copies of past litigation that identified potential monetary claims, private interests and public rights in the property. The Secretary of the Interior must ensure and stipulate in any final decision that easements, public rights on the properties remain enforce on the trust parcels. P332-23

Regional Director Dutschke must require the elimination of all liens, encumbrances or infirmities prior to taking final approval action on this fee to trust acquisition. Transferring this land into trust without directly contacting easement owners, addressing the issues of public rights represents a "taking or inverse condemnation" without due process or just compensation. Additionally, loss of access to private properties will devalue and make specific properties unmarketable, further creating *irreparable harm without just compensation*. The application does not fully or wholly address or resolve these real and immediate issues. P332-24

IX. 25 C.F.R. 151.10 On Reservation (h) The extent to which the applicant has provided information that allows the Secretary to comply with 516 DM 6, appendix 4, National Environmental Policy Act Revised Implementing Procedures, and 602 DM 2,Land Acquisitions: Hazardous Substances Determinations. (For copies, write to the Department of the Interior, Bureau of Indian Affairs, Branch of Environmental Services, 1849 C Street NW., Room 4525 MIB, Washington, DC 20240.)

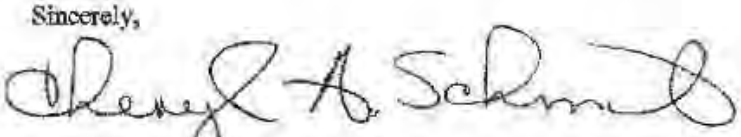
The application did not provide a report nor do we know if a report conforming to 516 DM 6, appendix 4, National Environmental Policy Act Revised Implementing Procedures, and 602 DM 2, Land Acquisitions has been submitted by the Chumash, the BIA or the Secretary of the Interior. Such a report is necessary now considering the Tribal Officials quote regarding the EPA and Army Core of Engineers. P332-25

The Camp 4 parcels have been and currently are used for agriculture. DDT and other outlawed pesticides were used regularly in agriculture in the not so distance past. A detailed report of surface and subsurface soil must be completed to prevent homes from being developed on land where still potentially hazardous substances may exist. P332-26

X. CONCLUSION:

This application as it is must be denied for all of the aforementioned reasons.

Sincerely,



Cheryl Schmit, Director
Stand Up For California
916 663 3207
cherylschmit@att.net
www.standupca.org

Comment Letter P333

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P327.

Comment Letter P334

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a near duplicate of Comment Letter P332.

Comment Letter P335

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter provides comments on the fee-to-trust application associated with the EA.

Comment Letter P336

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein the letter is correspondence regarding submission of a comment letter.

Comment Letter P337

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein the letter is correspondence confirming receipt of other comment letters.

September 17, 2013

Ms. Amy Dutschke
Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke:

I am writing in support of placing the Santa Ynez Band of Chumash Indians Camp 4 land into federal trust and also in support of the tribe's NEPA environmental assessment.

Santa Barbara County would experience a minimal decrease in the amount of assessable taxes in the county by placing the Camp 4 property into federal trust and removing it from the county tax rolls. The county generated $625 million in property taxes for the fiscal year 2011-2012 and is expected to generate $632 million for the fiscal year 2012-2013.

The total collectable taxes on the Camp 4 property for 2012-2013 was $83,255.20, which represents far less than 1% of the total that the county expects to generate from property taxes. Therefore, the percentage of tax revenue that will be lost by transferring the land into trust would be insignificant in comparison to the total amount of revenue enjoyed by the county.

P338-01

The tribe hopes to address the often-heard objection of the loss of property taxes when land is placed into federal trust with a Cooperative Agreement for Santa Barbara County. In that agreement the tribe would pledge to provide a payment in lieu of property taxes that would result in a million dollars per year for Santa Barbara County.

I hope that you will take this into consideration when making your decision to place the tribe's Camp 4 land into trust. Although the loss of property taxes would be minimal, the tribe is more than willing to offset that loss by negotiating a payment in lieu of taxes.

Thank you.

Sincerely,

Name: David Bonifacio
Address: 916 West Chestnut Ave Apt #B
Lompoc, CA 93436

Comment Letters P339 through P507

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P338.

September 18, 2013

Ms. Amy Dutschke
Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke:

I fully support the Santa Ynez Band of Chumash Indians' quest to place 1,390 acres into federal trust. The purchase of this ancestral land, known as "Camp 4," represented a significant milestone in the tribe's history. I also support the tribe's NEPA environmental assessment.

Located on Chumash Highway, the land is central to the Santa Ynez Chumash original territory and is historically significant to the tribe. To know that their ancestors lived, worked and played on this land thousands of years ago gives special meaning to this property.

Many tribal members have said that the land still has a sense of what it was like hundreds of years ago. When you stand in the middle of this beautiful piece of land and take a look around, you have unobstructed views of the landscape of Chumash ancestors including villages, shrine peaks, and trails. It is as if you are looking through the eyes of Chumash ancestors and seeing what they saw: the beauty of the gently rolling hills, the majestic oaks and a backdrop of the mountains in the distance.

The history of this land is inextricably linked to the tribe through their ancestors. It's rooted in their history, their heritage and their happiness about who they are as a tribe.

More than 200 years ago, the tribe owned this land. After years of stewardship by others, it's great for the tribe to have this portion of their ancestral land back. I hope that you make the right decision to place it into federal trust so that it can become part of the Santa Ynez Chumash Reservation.

Sincerely,

Name: Tomas Alvarado - Tomas Alvarado
Address: PO Box 5182
Sta. Maria, CA
93456

P508-01

Comment Letters P509 through P673

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P508.

September 19, 2013

Ms. Amy Dutschke
Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke:

As I understand it, the purpose of placing land into trust is to allow tribal communities to exist and function under and as tribal governments. I fully recognize the Santa Ynez Band of Chumash Indians as a government – and that's why I'm writing to show my support for placing the tribe's Camp 4 land into federal trust. I also support the tribe's NEPA environmental assessment.

Throughout the U.S., Native American tribes experience government-to-government relations at the federal, state and county level. The message comes through loud and clear that Native American tribes *are* governments and should be treated as such. But based on a recent vote by the Santa Barbara County Board of Supervisors, the county simply doesn't understand that the Santa Ynez Band of Chumash Indians is tribal government.

P674-01

More than two years ago the tribe submitted a Draft Cooperative Agreement to the county, hoping to discuss its Camp 4 land. Unfortunately, the tribe was unable to schedule a single meeting with the county.

At the August 20th Santa Barbara County Board of Supervisors meeting, Tribal Chairman Vincent Armenta asked, once again, to enter into a dialogue on a government-to-government basis with the county to discuss the tribe's Camp 4 project. But in a 3-2 vote, the Board refused.

I am looking forward to seeing the Camp 4 land placed into federal trust so that the tribe can exercise its self-determination and sovereignty over the property – as a tribal government should.

Sincerely,

Amber Ventura

Name: Amber Ventura
Address: 1738 Lynne Dr. Unit 30
Santa Maria CA 93454

Comment Letters P675 through P828

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P674.

September 20, 2013

Ms. Amy Dutschke
Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Dutschke:

I would like to take this opportunity to show my support for the Santa Ynez Band of Chumash Indians' application to place the tribe's Camp 4 land into federal trust and my support for the tribe's NEPA environmental assessment.

When the tribe purchased Camp 4 in 2010, one of the primary goals was to build housing for tribal members and their families. The tribe has simply run out of room on its existing reservation.

There is a strong desire for tribal members to live together in one community under the jurisdiction of their tribal government. Parents, children, grandparents, aunts, uncles, cousins – all within walking distance of one another in a tribal community. This situation is happening to some extent on the tribe's reservation, but there isn't enough room to accommodate the growing tribal family. Those who do live on the reservation with their family members are living in crowded quarters – some with two or three generations under one roof.

P829-01

Currently, only about 17% of the tribe's members and lineal descendents live on the reservation. Placing the Camp 4 land into federal trust would allow the tribe to accommodate current and future generations of Santa Ynez Chumash. It would also create a meaningful opportunity for tribal members and their families to be a part of a tribal community revitalization effort that rebuilds tribal culture, customs and traditions.

Please consider the tribe's housing needs when making your decision on the tribe's federal trust application for its Camp 4 land.

Thank you.

Sincerely,

Jeffrey N. Baugher
1783 Trilogy Parkway
Nipomo, CA 93444

Comment Letters P830 through P983

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P829.

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

Dear Mr. Broudsard,

My Husband and I live in Santa Ynez Rancho Estates and our home borders the east side of the 1,400 acres know as camp 4. We have recently found out that our property is also in a Tribal land Consolidation and Acquisition plan and so are the water wells that supply all of SY Rancho Estates. P984-01

The TCA was approved without any notice or discussion to any County Government or private homeowners whose properties will be negatively impacted by this decision. P984-02

The EA for the annexation of the 1400 acres camp 4 only addresses the 1,400 acres that is camp 4. What about the other 10,000 acres? There must be a complete Environmental Impact Statement done on all of the property involved including the TCA.

The project is inconsistent with and contrary to the Santa Ynez Valley Community Plan. The plan will negatively impact the environment and place an unreasonable burden on local infrastructure and the surrounding homes and community. P984-03

The water wells for Rancho Estates are located in the TCA. There was no study done on how the developing of camp 4 on site systems using ground water would affect the ground water and exciting wells in the area. P984-04

Camp 4 is bordered on the north and south by narrow county roads that do not have paved shoulders and limited in sight. The impact of construction of the 143 homes, suggested banquet and exhibition hall with 400 parking spaces and the related traffic requires further study. P984-05

If this is allowed to go forward as is, it will change the Santa Ynez Valley forever. Please an Environmental Impact Statement is warranted. P984-06

received
RES 10/21/13

Thank you,
Caryn and Tom Cantella
1551 Linda Vista Dr.
Santa Ynez, CA 93460

Comment Letters P985 and P986

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters is nearly identical to that of Comment Letter P280.

Comment Letter P987

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825

1 October, 2013

Subject: Camp 4 Chumash TCA, Santa Barbara County, CA.

My specific comments below reflect one central concern. To date the Chumash plan has not addressed fundamental existing protections that our community depends on to protect our environment and govern development. P987-01

We are in a severe and prolonged drought throughout the Central Coast. The current Chumash plan amounts to carte blanch rights to drain our Santa Ynez Valley aquifer without regard to County standards that every other citizen and group must comply with. Our County government needs time to assess water, and a variety of other, impacts before the plan is approved. This is a simple matter of courtesy from one branch of government to another. Please delay until Santa Barbara County can fully review the Chumash plan. P987-02

Kathleen S. Day

Kathleen S. Day
714 Hillside Drive, Solvang, CA.

Reg Dir. ADI
Dep RD Trust ✓
Dep RD IS
Route Delros
Response Required yes
Due Date
Memo Ltr
Fax

Comment Letter P988

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825

1 October, 2013

Subject: Camp 4 Chumash TCA, Santa Barbara County, CA.

My specific comments below reflect one central concern. To date the Chumash plan has not addressed fundamental existing protections that our community depends on to protect our environment and govern development. P988-01

Currently water rights for over 20 ground water basins are in adjudication by the California State Superior Court. One of these, the Santa Maria Basin, is in our Central Coast area. I ask you to consider that the Chumash plan states that they would develop an on-site water supply *using groundwater*. Since the Chumash plan provides no explanation of how this would impact the underlying aquifer, the plan is deficient. BIA approval of the current Chumash plan would circumvent long-standing county planning requirements for oversight of our precious water resources. The Chumash plan would amount to a blank check to drain the aquifer without any level of government oversight. This is especially important during the current prolonged drought that has affected the entire Central Coast. P988-02

My specific thoughts in the above paragraph extend to a wider issue. There is an underlying tone throughout the Chumash plan that weakly masks the entire issue of county oversight. Approval of the current plan would create two classes of citizens, those who must comply with County oversight and those who do not. The Chumash have consistently said that they want to be part of our overall community; but the current plan places them in a special privileges category. Another example is access roads that would not have to comply with County guidelines. P988-03

I will forward my concerns to our elected Federal and State representatives at all levels.

Kenneth P. Day

Kenneth P. Day
714 Hillside Drive, Solvang, CA.

Reg Dir. ___
Dep RD Trust ___
Dep RD IS ___
Memo ___
Fax ___

1 Oct 2013

Dear Ms Dutschke,

Please come to Santa Ynez and speak to those who live here ~~before completing~~ your enviconmental assessment. The Chumash Casino has already done severe damage to our beautiful valley. If the fee to trust application is approved for Camp 4 it will destroy the character & pristine beauty of the Santa Ynez Valley. P989-01 P989-02 P989-03

Do not let 140 wealthy casino beneficiaries lie and manipulate their way to exploit the law. The Chumash Tribal government has demonstrated a blatant disregard for the natural beauty of this small rural community. P989-04

There are tens of thousands of people entering our valley to gamble. They leave trash, destruct nature and cause pollution. P989-05

Sincerely,
Karen Jones

Reg Dir
Dep RD Trust
Dep RD Is
Route
Response Required
Due Date
Memo Ltr
Fax

October 2, 2013

Amy Dutschke, Regional Director, Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Dear Ms Dutschke,

I am a fairly recent resident of the Santa Ynez valley, but in a short time we have come to love the valley, it's residents, and the rural quality of life here. I am very concerned about the potential adverse environmental and community effects of the annexation of Camp 4 to the Chumash reservation. I don't blame them for wanting to accomplish this goal, however it is inappropriate for this property and this community. The environmental effects can be monumental especially if this land is annexed to the reservation. At that point there would be absolutely no controls on what is done with the land vs. leaving it as property owned by the tribe and developed under the guidelines of normal channels with the county of Santa Barbara. P990-01 P990-02 P990-03

Even though their proposals may not seem so much to an outsider not familiar with the area, they will result in huge changes to the surrounding area with traffic, light pollution, loss of large numbers of CA oak trees, wetlands, and a huge increase in water consumption. And that is if they actually follow their proposals. Of course human nature tells us that they will not. The proposed need for a waste water plant suggests a tremendous use of water and sewage production. They propose 100 events a year, with 400 parking spaces plus how many more will be added once there are no controls put on any development plans. To think that there will be minimal environmental impacts is naive and to think that they will not add additional gaming facilities, hotel accomodations, and commercial endeavors beyond the current proposals is also naive. When the tribal leadership was asked if they would put the bulk of Camp 4 into a land trust since they say they will not develop it anyway, they responded with an absolute NO WAY. Further development would be an environmental disaster to the valley.....coming from someone who is not a rabid environmentalist. P990-04 P990-05

Our water aquifers are already in trouble and any additional water use will present huge problems for the immediate neighbors and the rest of the Santa Ynez valley residents well into the future. Land use rules are in place for a reason: to prevent large scale degradation of the environment, our resources and the quality of life for all in the valley (including the Chumash).

The current environmental report is clearly inadequate and inaccurate and needs to be revisited. P990-06
The fee to trust of Camp 4 must be stopped. The Chumash can and should develop the property only under the guidelines and restrictions that exist currently in the county of Santa Barbara. P990-07

Sincerely,
William J Otto
380 Meadowlark Rd
Santa Ynez, CA 93460

William J Otto

John D. Wrench
105 Cañon Dr.
Santa Barbara, CA 93105
805-569-1023
email: jdwrench@cox.net

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

October 1, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Dear Director Dutschke, Re: Chumash Camp 4 fee-to-trust EA

I have reviewed the Environmental Assessment (EA) prepared by Analytical Environmental Services on behalf of the Chumash Tribe for their Camp 4 fee-to-trust application and hope you will consider the following comments in making your decision about the application. I urge you to make no finding on this inadequate and speculative assessment, and allow the proposal to die (Proposed Alternative C in the EA). P991-01

In section 1.3 on the need for the project the EA states that the land needs to be in trust to provide housing for tribal members and "Secondarily, the trust acquisition of the proposed trust land would also allow full tribal governance over its existing agricultural operations on the property; thereby allowing the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises." Neither of these goals requires additional land be placed into a reservation, protected from county land use regulations and taxation. There is no reason that the tribe cannot use its considerable resources to purchase housing for tribal members, and the agricultural businesses described in the paragraph as well as any other business can be pursued whether or not the land is in trust. There is simply no merit to these assertions. P991-02

Section 2 describes the three alternatives put forth in their proposed large scale 1411-acre development:
A, five acre lots with common areas, with existing ag business
B, one acre lots with 33 acres of "tribal facilities" and the existing ag business (vineyard), or
C, no federal action/development. P991-03

With respect to the tribal facilities in option B: 400 parking spaces and 33 acres of development with "up to 100 events/year" represents a gigantic environmental impact on the local water, air, and traffic resources. In addition, while the

"environmental justice" portion of section 4 talks a lot about impacts on low income housing and minority communities, it leaves out entirely the effects of such a massive development, essentially a medium-sized convention center, on local people and their desire for a rural ambiance in their part of the county.

P991-03 Cont.

Sections 2.2.5 and 2.2.6 describe plans for developing groundwater supplies on site and dealing with wastewater treatment and recycling on site. Simply put, these plans are wholly unrealistic and will have huge negative local impact, especially the plan to supply the additional water for the giant development from just two additional water wells whose output is completely theoretical. One of the four existing wells on the property is completely dry, and later in the EA the severely stressed status of all surrounded waterways (Santa Ynez river, other creeks) and groundwater resources is admitted. To imagine that a bone-dry area of grazing land in a water-starved county can suddenly sustain two or more new 750GPM water wells without seriously affecting the groundwater supplies for all surrounding properties is not credible. Later in the report some old well tests are quoted to support this. One of the tests is from 1984, the other from 1999 (Section 3.2.2). It's unlikely these wells are producing anything close to what they were then. Appendix C clearly states that the Santa Ynez Uplands Groundwater basin is currently pumping more water than can be sustained. The proposed development compounds this problem.

P991-04

In addition, the proposed wastewater treatment plant (WWTP) would have to recycle a huge percentage of their total wastewater production to avoid discharge into the local aquifer (90% or more, in Appendix C). They have proposed using the existing small vineyard irrigation reservoir to store this graywater. But now it would need to store water for a development now 6 times the size of the existing vineyard. This is not realistic.

P991-05

One very amusing statement is that native trees would be protected in accordance with the "Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians." This sounds good, but as admitted later in the EA, the Tribal Ordinance allows for removal of any oaks that "interfere with the construction of Tribal facilities," which, on a Reservation, is pretty much anything. 70 oaks would fall in option A, 35 in option B.

P991-06

Section 3 is devoted to listing local resources that would be affected by this proposed development. The EA admits that all of the local land, water, air, traffic, biological, and visual resources of this part of the county would be negatively affected, some in a big way. This section emphasizes the benefits to a minority community, the Chumash, who would definitely benefit. However, option C (no federal action) would not prevent the Chumash from applying to develop the land, currently zoned largely for agriculture in 100 acre lots. They would simply have to follow the same application procedures that any large developer of agricultural land would have to follow in California to change a zoning designation. Or, they could simply purchase housing for their lineal descendants on the open market,

P991-07

like everyone else.

P991-07 Cont.

Some of the affected resources listed in Section 3.8 are the Santa Barbara County Comprehensive Land Use Plan, and the subsidiary Santa Ynez Valley Community Plan. Federal approval of either option A or option B directly contradicts the policy of local governments. These plans were developed over many years with great effort on the part of county staff and government resources. Approval would also contradict the inlent of the federal Farmland Protection Policy Act (FPPA) of 1981 and the Williamson Act, as well as SB county Right to Farm laws and certain Federal Dept. of Agriculture soil and water cconservation policies regarding existing farm/grazing land. Do you really want to run roughshod over so many carefully constructed government policies with laudable goals in order to allow relatively unregulated development of a new Indian Reservation?

P991-08

Section 4 is especially disturbing when revealing the cumulative impacts of either option A or B on traffic congestion at intersections. Section 5 suggests mitigation by construction of roundabouts, with the Tribe to pay a small percentage of the cost (3.5 to 33%, depending on the intersection -Table 5.7-1). This will help a little, but at the cost of fundamentally changing the character of a rural road.

P991-09

Finally, Section 5 suggests a series of minor mitigation maneuvers none of which truly mitigate the effects of this proposed large development. What is being proposed here with Options A or B is nothing less that the creation of a small city on agricultural land, with its own water supply and WWTP based on questionable projections, and the development of which would violate the letter and spirit of the SB County Comprehensive Land Use Plan and Santa Ynez Valley Community Plan. It is opposed by a large majority of local residents, and we urge you strongly not to approve the Fee-to-trust application (select option C in the EA), meaning no Federal action should be taken on this application.

P991-10

P991-11

P991-12

Please don't hesitate to contact me with any questions. Thank you for your consideration of these comments.

Sincerely,

John D. Wrench

Comment Letter P992

Response Required Yes
Due Date
Memo Ltr
Fax

Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825
September 28, 2013

Re: Camp 4 annexation and TCA

Dear Ms. Dutschke:

Many environmental and traffic concerns are obvious to valley residents. P992-01

Highways 101 and 154 serve the area. The project calls for 400 parking spaces, which suggest a facility open to the public and attracting people from outside the Santa Ynez Valley area. Highway 154 is nationally known for its spectacular scenic views. Please drive 154 between Santa Barbara and Chumash/Santa Ynez to confirm that usage is often heavy. The CHC (California Highway Commission) has widened and added passing lanes but 154 remains a dangerous highway. CHC has statistics on fatalities and accidents on 154. The topography permits almost no shoulders; bicyclists have not more than a foot allotted to them in most areas. Cars and trucks often travel in long lines. A survey of how much traffic will be added to 154 is necessary. P992-02

Water sources also need to be investigated thoroughly. The area is notoriously dry. The reservoir serving Santa Barbara can be seen by the naked eye and has run very low in past years. Would similar dry spells affect the aquifer intended to provide water for the project? Has an analysis been done on water supply vs. demand associated with the housing and other demands from the proposed annexation? P992-03

It is my understanding that EPA rules require a full environmental review of a project of this size. P992-04

Please hold approval of annexation until a full environmental review has been undertaken.

With respect,

Elizabeth Gill

Elizabeth Gill
Owner-4315 Oak View Road
Mailing address-4475 Oak View Road
Santa Ynez, CA 93460.

Comment Letter P993

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter is a duplicate of Comment Letter P311.

John & Cynthia Sanger
1678 Sky Drive
Santa Ynez, CA 93460

September 23, 2013

Amy Dutschke, Regional Director
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Impact of the Santa Ynez Band of Mission Indians' (Chumash) proposed annexation of Camp IV and TCA

Dear Amy,

Over a decade ago my wife and I moved north from Santa Barbara to a home on a quiet country lane with no street lights, considerable open space and expansive views of two mountain ranges. The title company assured us of unencumbered title and we were apprised of applicable building ordinances, local CC&R's and property taxes through which we are happy to support our schools, firefighters, Sheriffs and police. We are part of the Rancho Estates, a community whose own water company has two well sites on privately owned land. We are pleased that much of the surrounding land is agricultural or in agricultural preserve status, ensuring very little development. P994-01

About three years ago the Santa Ynez Band of Chumash Indians purchased 1,400 acres from the Fess Parker family (referred to as Camp 4) for the stated purpose of providing housing for tribal members. A number of months ago we as Valley residents learned the tribe was seeking fee-to-trust status for the Parker family property and, more recently, of the tribe's Consolidation and Acquisition Plan (TCA) which proposes in addition to the annexation of the Parker family property, the "fast track" procedure for individual private properties purchased within a designated 11,500 acres in the community, which includes Rancho Estates. P994-02

My wife and I object to this plan, but not because we "dislike the prospect of living near Native Americans" (Sam Cohen, Chumash legal advisor, Santa Barbara News Press, Sept. 22, 2013); in fact, we have traveled extensively for many years the coastal waters of British Columbia and have utmost respect and admiration for the First Peoples' efforts to revitalize their native tribal roots and seafaring culture. P994-03

The second and third of the tribe's stated objectives in the TCA (the first being to locate land for housing) are to provide space for "economic development" and "tribal government activities." If the tribe's purchased land can easily be removed from the local and county ordinances, regulations and taxes members of our community abide by, there is no assurance to present landowners that an adjacent property will not be commercially developed or have multiple dwellings – presently prohibited. It is recognized as well that only one of the two granted tribal gaming permits is presently activated; we wonder where and when the second will be put to use. Additionally, the aquifer from which Rancho Estates draws its water could be gravely impacted and tribal purchase of the private well lands could remove our water sources altogether. P994-04 P994-05 P994-06

Unfortunately, in past years representatives of the Chumash tribe have been less than forthcoming with their intended plans for development, perhaps beginning with minimal participation some years ago in helping to put together the Santa Ynez Valley Community Plan – a vision by Valley residents (including the Chumash Tribe) and businesses for the future of the Valley. Possibly the Valley Blueprint was the ideal vehicle to have fostered a cooperative working relationship between the community and Tribe, a relationship which sadly seems to have become increasingly fraught with rancor and polarization on both sides. Recent tribal initiatives appear to disregard the Blueprint altogether. P994-07

In summary, under the provisions of the TCA those who live within the designated 11,500 acres are given no assurance that our surrounding lands and water sources will not be deeply impacted by uncontrolled commercial and residential development. As non-Santa Ynez Valley Chumash tribal members, private owners will gradually lose local governmental representation and oversight of their adjacent neighborhood as stewards of their individual lands. On these grounds, posing so many unknowns, my wife and I herewith file our objection to the granting of annexation and the TCA plan for the Santa Ynez Valley. P994-08 P994-09

Respectfully submitted,

John H. Sanger
Cynthia R. Sanger

John H. Sanger

cc: Chad Broussard, E.P.S.
Dept. of the Interior, B.I.A.

AMY DUTSCHKE, REGIONAL DIRECTOR
BUREAU OF INDIAN AFFAIRS, PACIFIC REGIONAL OFFICE
2800 COTTAGE WAY
SACRAMENTO, CA 95825

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

OCTOBER 3. 2013

DEAR MS. DUTSCHKE,

RE: ENVIRONMENTAL IMPACT ASSESSMENT

I AM A RESIDENT OF THE SANTA YNEZ VALLEY, SANTA BARBARA COUNTY.....I STRONGLY OPPOSE THE UNPRECEDENTED CHUMASH "TRIBAL CONSOLIDATION AREA APPROVED BY YOUR OFFICE.....AND ALSO OPPOSE THE FEE TO TRUST OF CAMP 4. P995-01

I DON'T KNOW IF YOU ARE AWARE OF THE HORRIFIC IMPACT THE CURRENT CASINO HAS ON OUR TEENAGE YOUTH IN THE SANT YNEZ VALLEY.....I KNOW FROM CLERGY IN THE AREA THAT THEY HAVE BEEN NONSTOP COUNSELING FAMILIES AND TEENAGERS....

RE: DRUGS, GAMBLING, AND DRINKING DONE AT SAID AREA BY OUR RESIDENT TEENAGERS. High School is ½ mile from Casino P995-02

SINCE THERE IS ANOTHER VIABLE GAMING PERMIT AVAILABLE TO THE TRIBE, IT WOULD BE UNWISE TO ALLOW THE TRIBE TO GO INTO TRUST WITH ADDITIONAL PROPERTY .....NOT ONLY UNWISE.....BUT DIASTROUS.....

I ALSO AGREE WITH ALL THE OPPOSITION LETTERS YOU HAVE RECEIVED REGARDING THE MANY OTHER ENVIRONMENTAL IMPACTS SOME OF WHICH ARE WATER RIGHTS, CONTROL OF USAGE AND CONTAMINATION OF WATER, THE IMPACT ON THE ECOLOGY, THE IMPACT ON THOUSANDS OF U.S. CITIZENS LIVING IN THE TCA, ECONOMICALLY AS WELL AS MORALLY, AND THE ECONOMIC IMPACT OF LOSS OF REVENUES COMBINED WITH AN INCREASE IN USE OF RESOURCES. P995-03

VERY TRULY,

Mimi (Mireille) S. M. Walston

MIMI WALSTON
300 FREYA DR.
SOLVANG, CA 93463

Santa Barbara Audubon Society, Inc.
A Chapter of the National Audubon Society

5679 Hollister Avenue Suite 5B, Goleta, CA 93117 (805) 964-1468

October 5, 2013

Amy Dutschke
Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

Subject: Comments on Santa Ynez Band of Chumash Indians Camp 4 Fee-to-Trust Draft Environmental Assessment, Santa Ynez Valley, Santa Barbara County, California

Dear Ms. Dutschke:

Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society. SBAS educates members of the Santa Barbara community about birds and their habitats and advocates responsible legislation and public policies which help preserve our natural resources. SBAS has about 1100 members in Santa Barbara County. P996-01

SBAS believes that the assessment of biological resources in the Environmental Assessment (EA) is inadequate and flawed for the following reasons:

The impact evaluation in the EA is restricted to federally-listed species. By limiting the evaluation to federally-listed species the EA presents an incomplete picture of the full range of special-status species that occur or which could potentially occur on the project site and which could be affected by the proposed project. These species include a wide variety of plants and animals classified as Special Concern by the California Department of Fish and Wildlife.

The project site is an important wintering ground for several migratory bird species and birds of prey, yet there were no surveys conducted in any month between September and March. Point-count surveys should conducted at several different times of the year, in order to characterize use of the site as foraging and nesting habitat for migratory birds and raptors. P996-02

The EA states, "No migratory birds or other birds of prey were observed nesting during the 2011, 2012, and 2013 biological surveys of the project site." This statement severely strains credibility and demonstrates the inadequacy of the survey. A thorough survey of all habitats within the project area would have certainly detected several species nesting, including western meadowlark and red-tailed hawk. California horned larks, a Watch List species, have been observed breeding on the property by local birders as well.

The EA, in Appendix E, Species Lists and Biological Assessment, shows only 16 bird species observed on the site. In contrast, an on-line bird occurrence site, e-Bird[1], shows 110 species at the Happy Canyon Road "hot spot" adjacent to the site. Again, this severe discrepancy demonstrates the inadequacy of the biological survey.

Other examples of inadequacy of the EA:

The EA does not mention of the occurrence of the golden eagle on the project site. The site has nearly perfect grassland and oak savanna foraging habitat for golden eagles. Golden eagles have been reported near the site on Happy Canyon Road[2].

Bald eagles are known to winter at nearby Cachuma Lake; Santa Barbara County even offers eagle cruises in the winter months. In addition, it is widely known among Santa Barbara County birders that bald eagles nest within approximately two miles of the site. It is highly likely that bald eagles at least pass over the site.

The fact that the impact of the project on golden and bald eagles is not stated is a serious flaw in the EA. These two species are protected by the Bald and Golden Eagle Protection Act. The impact of the project on these species must be determined.

P996-02
Cont.

Prairie Falcons and Ferruginous Hawks, also Watch List species, forage here regularly. Also, Burrowing Owl and Grasshopper Sparrow are Species of Concern with potential to occur here.

In addition, the only nesting pair of Vermilion Flycatchers in the Santa Barbara County are found on the site and possibly the biggest wintering population of Chestnut-collared Longspurs in cismontane California is found there.

SBAS again emphasizes the inadequacy of the biological survey done for this project. We urge the BIA to significantly improve the survey methodology and conduct a thorough, complete, and accurate survey. Then an unbiased professional assessment of the environmental impact of the project should be completed.

Yours truly,

Stephen J. Ferry
Co-President
Santa Barbara Audubon Society

[1] See http://ebird.org/ebird/hotspot/L367318 .
[2] Golden eagles are regularly observed in this area. See, for example, http://groups.yahoo.com/neo/groups/sbcobirding/conversations/messages/18439 and http://groups.yahoo.com/neo/groups/sbcobirding/conversations/messages/18492 .

Reg Dir ald
Dep RD Trust
Dep RD IS
Route DECRMS
Response Required YES
Due Date
Memo Ltr
Fax

10/07/2013

Amy Dutschke, Regional Director

Bureau of Indian Affairs

Pacific Regional Office

2800 Cottage Way

Sacramento, CA 95825

Ref: WATER AND WASTEWATER FEASIBILITY ANALYSIS FOR CHUMASH CAMP 4 PROPERTY FEE-TO-TRUST APPLICATION ENVIRONMENTAL ASSESSMENT

Dear Amy,

This letter is to point out the deficiencies in the EA and the problems that would occur if a Fee to Trust were approved. P997-01

The data is cherry picked to support their cause.

Where are the results of California Basin Management study mandated by AB3030? This study was performed by the Santa Ynez Water Conservation District, Improvement District No. 1 (ID#1). If Fee-to-Trust were granted, would the basin be exempt and the Chumash be free to pump any amount from the Santa Ynez Uplands Basin? P997-02

The Chumash state there is no water available to them except from the Santa Ynez Uplands Basin. But the surrounding area residences and ranches use, in addition to wells in the Basin, ID#1 water which could be made available to them. P997-03

Why isn't the parent district, Santa Ynez River Water Conservation District, not used as a resource? P997-04

The parent district is tasked with monitoring this basin and others to the Pacific Ocean to determine the health of each of the basins. Are the basins in under or over draft. P997-05

The County of Santa Barbara, each year in March, measures the water level in selected wells to determine the health of each basin. Where is that data in the EA? P997-06

Pumping of the basin resulting in a severe overdraft can affect water quality as well as water quantity. In the late 1990s, the City of Solvang, situated 5 miles west and south of Camp 4, drilled well #22. After developing the well with 6 weeks of continuous pumping, H2S (hydrogen sulfide) P997-07

levels increased to where no amount of clorine injection could burn out the H2S. An unaffordable treatment plant would be required to make the water potable. This situation could occur in the Camp 4 area and would render the residential and farm wells in the area unusable.

P997-07
Cont.

Sincerely,

Fred Kovol

1676 Nordentoft Way

Solvang, CA 93463-2115

VA

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

October 4, 2013

Santa Ynez Valley Alliance

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

Interior Board of Indian Appeals
Offices of Hearings and Appeals
U.S. Department of the Interior
801 N. Quincy Street, Suite 300
Arlington, VA 22203

RE: Comments on Santa Ynez Band of Chumash Indians Camp 4 Fee-to-Trust Draft Environmental Assessment

Dear Ms. Dutschke:

Thank you for the opportunity to comment on the Environmental Assessment (EA) for the Camp 4 Fee-to-Trust Annexation.

The Santa Ynez Valley Alliance works collaboratively with individuals, groups and governments to protect the rural character of the Santa Ynez Valley and support good stewardship of natural and agricultural resources through education, comprehensive planning and public participation. The Board of Directors of the Valley Alliance, many of whom have significant land use and planning experience, worked extensively for several years on the Santa Ynez Community Plan update, attending hearings and submitting detailed comments. As a result, the Alliance was able to support the adoption of the Plan by the Board of Supervisors. P998-01

The Valley Alliance has been monitoring the Camp 4 issue for more than three years and has a number of comments on the EA as follows:

1.2 LOCATION AND SETTING

First and foremost, we are concerned about the statement made on page 1-5 in the Environmental Assessment that this application will be treated as "on-reservation". Our research confirms that the rule that would have allowed this application to be treated in that manner was withdrawn in November of 2001 (66 Federal Register 56608, 11-9-2001). P998-02

POST OFFICE BOX 941
SANTA YNEZ, CA 93460
info@santaynezvalleyalliance.org
www.santaynezvalleyalliance.org

The current regulations are found in 25 CFR Part 151. Although 25 CFR 151.3(a)(1) states that land may be acquired for a tribe in trust status when the property is located "within the exterior boundaries of the tribe's reservation or adjacent thereto, or within a tribal consolidation area," this provision does *not* discuss the *process* by which land may be acquired. Contrary to the statement in the Environmental Assessment, 25 CFR 151(a)(1) does *not* provide that property located within a tribal consolidation area is given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation.

Instead, the requirements, process and criteria for considering applications for trust acquisitions are set forth in 25 CFR 151.9-15. The section that addresses on-reservation acquisitions is 25 CFR 151.10. This section applies to situations "when the land is located within or contiguous to an Indian reservation." Section 151.11, on the other hand, deals with off-reservation acquisitions and applies to land that "is located outside of and noncontiguous to the tribe's reservation." This section requires greater scrutiny as the distance between the land the tribe's existing reservation increases, and gives greater weight to concerns raised by state and local governments. (*See* 25 CFR 151.11(b).) Nothing in either of these sections references tribal consolidation areas. Accordingly, land acquisition requests are handled as either on-reservation or off-reservation, depending upon whether the land is located within, contiguous or outside the tribe's existing reservation. Because the Camp 4 property is not located within or contiguous to the Santa Ynez reservation, the application must be treated as off-reservation and thus subject to greater scrutiny.

The statements in the Band's Plan and the BIA's Environmental Assessment do not comport with existing regulations. As such, the Valley Alliance requests that they be corrected.

P998-02 Cont.

2.0 PROJECT ALTERNATIVES

It is important to note that the Purpose and Need of the proposed annexation are to provide tribal housing. Therefore, the Alternatives in the document must adhere to that purpose and need. The EA should focus on Alternatives that provide the desired housing while protecting the rest of the property from adverse impacts. Hence, Alternative B should cluster the proposed housing sites, or the EA should include an additional alternative that provides clustered, 1-acre lots.

P998-03

3.4 AFFECTED ENVIRONMENT - BIOLOGICAL RESOURCES

As noted in the attached Environmental Setting report for the proposed Camp 4 development property, the project site supports two major vegetation alliances, grasslands and oak savanna in particular, which cover approximately 80% of the site. The oak savannas include both coast live and valley oaks, both of which are protected by County ordinances. These habitats provide cover, foraging, denning, and nesting habitat for a broad diversity of animal species, including habitat that is being used or could be used by the federally-threatened California red-legged frog,

P998-04

vernal pool fairy shrimp and Swainson's hawk and the fully protected golden eagle, white-tailed kite and black bear (see documentation in attached report). Given the size and location of the property, its value as a wildlife movement corridor must also be considered. P998-04 Cont.

4.1.4 ENVIRONMENTAL CONSEQUENCES - BIOLOGICAL RESOURCES
According to the attached letter by Lawrence E. Hunt, consulting biologist, the evaluation of impacts to biological resources is insufficient and fails to adequately evaluate and disclose the significant impacts of the proposed project. An Environmental Impact Statement (EIS) must be prepared to address the issues raised by Mr. Hunt's letter. P998-05

4.1.8 LAND USE
The EA notes the inconsistency with County's zoning and general plan land use designation, but nevertheless says that there would be no land use impacts because development would be compatible with surrounding land uses. Given that this significant inconsistency with the zoning and land use designation (e.g., 143 units plus potential community center vs. 14 units) must be considered a significant impact, this conclusion is incorrect. Furthermore, the loss of agriculture would be inconsistent with County policy. Both development alternatives would convert most of the project site to non-agricultural uses, resulting in a loss of more than 1100 acres of agricultural land, leaving only 300 acres (less than 1/4 of the site). P998-06 P998-07

4.4 CUMULATIVE EFFECTS
The EA states that long-term cumulative conditions were established based upon the County's Santa Ynez Valley Community Plan. While this Plan is an appropriate resource upon which to evaluate cumulative effects, the EA should also include information from the Santa Ynez Band's Tribal Consolidation and Acquisition Plan (Appendix M to the EA). P998-08

CONCLUSION
Based upon the above information, including the attached Environmental Setting report and comment letter from Lawrence E. Hunt dated October 3, 2013, the Santa Ynez Valley Alliance respectfully respects that the BIA prepare a full Environmental Impact Statement for this proposal. P998-09

Sincerely,

Mark Oliver, President

Atts: Hunt, Lawrence E. *Environmental Setting for Proposed Camp 4 Development Project, Santa Ynez Valley, Santa Barbara,* California. September 13, 2013.

Hunt, Lawrence E. *Comments on Santa Ynez Band of Chumash Indians Camp 4 Fee-to-Trust Draft Biological Assessment and Environmental Assessment, Santa Ynez Valley, Santa Barbara County, California.* October 3, 2013.

cc: U.S. Senator Dianne Feinstein
U.S. Senator Barbara Boxer
Congresswoman Lois Capps
County of Santa Barbara

Lawrence E. Hunt
Consulting Biologist

Amy Dutschke, Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

3 October 2013

Subject: Comments on Santa Ynez Band of Chumash Indians Camp 4 Fee-to-Trust Draft Biological Assessment and Environmental Assessment, Santa Ynez Valley, Santa Barbara County, California.

The Biological Assessment (BA) and Environmental Assessment (EA) prepared for the proposed project identify adverse impacts to these biological resources:

- Special-status species;
- Oak trees and oak savanna habitat;
- Critical habitat for vernal pool fairy shrimp (*Branchinecta lynchi*) (VPFS);
- California red-legged frog (*Rana draytonii*);
- Waters of the U.S.;
- Nesting migratory birds and raptors;
- Migration corridors.

P998-10

The EA states that implementation of the mitigation measures described in the document would reduce project-related impacts to these resources to less than significant levels. This letter comments on the thoroughness of the BA and EA and the effectiveness of the proposed mitigation measures.

Occurrence of Special-Status Species. The impact evaluation in the BA and EA is restricted to federally-listed species, per NEPA allowances. However, this does not change the fact that, by limiting the evaluation in this way, these documents necessarily present an incomplete picture of the full range of special-status species that are known from or which potentially occur on the project site and which could be affected by the proposed project. These species include a wide variety of plants and animals considered Special Concern by the California Department of Fish and Wildlife (CDFG, 2009) and the California Native Plant Society (Tibor, 2001), species protected by various County policies and regulations, and a number of wildlife species on "Watch Lists" prepared by the Audubon Society, CDFW, CNPS, or County of Santa Barbara (2008).

P998-11

Page 3-36 of the EA claims that no federally-listed plants occur on-site, but there are a number of List 1B plants with a moderate to high potential of occurring on-site and

Hunt & Associates
Biological Consulting Services
5290 Overpass Road, Suite 108
Santa Barbara, California 93111

Phone: (805) 967-8512 Fax: (805) 967-4633
e-mail: annielia@verizon.net

which have some federal status. Protocol level-surveys conducted at appropriate times of the year are needed to rule out occurrence of these species on-site:

P998-11 Cont.

Special-Status Plants with Moderate to High Potential of Occurring On-Site.

Common Name (Scientific Name)	CNPS Listing Status*	Flowering Time and Habitat	Nearest Known Occurrence	Potential for Occurrence
Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)	List 1B	February-June Vernal pools and vernal flats	Edge of Hwy 154 between Santa Ynez River and San Lucas Creek, about 2 air mi SE project site (1997)	Moderate to high potential in stony grasslands in central and southern portions of project site
Dwarf calycadenia (*Calycadenia villosa*)	List 1B	May-October Chaparral, woodland, grassland, seeps	Old record for vicinity of Los Alamos; about 6 mi NW of project site (no date)	Moderate potential in grasslands on project site
Hoover's bent grass (*Agrostis hooveri*)	List 1B	April-July Chaparral, oak woodland, grassland	Upper west fork of Ballard Cyn., approx. 3.5 air mi NW project site (no date)	Moderate to High potential in grassland and savanna on-site
Late-flowered mariposa lily (*Calochortus weedii vestus*)	List 1B	June-August Chaparral, woodland, often on serpentine	San Marcos Pass, E of summit, about 12 air mi SE project site (1955) Painted Cave Road, S of jct E Camino Cielo, about 14 air mi SE project site (2006) E Camino Cielo at Laurel Springs, about 13 air mi SE project site (2006)	Moderate potential in oak savanna on-site, but all known occurrences are in montane areas surrounding the Santa Ynez Valley
Mesa horkelia (*Horkelia cuneata* subsp. *puberula*)	List 1B	February-September Chaparral, oak woodland, coastal sage scrub, and sand hill scrub on sandy soils	Solomon Hills approx. 3.3 air mi SE jct Clark Ave x Hwy 101, about 10 mi NW project area	Moderate potential, most soils on-site may be unsuitable for this species (clays and silts; could be found in sandy portions of washes
Mile's milk-vetch (*Astragalus didymocarpus* var. *milesianus*)	List 1B	March-June Coastal sage scrub on clay soils	2.5 mi NW Buellton, approx. 7.5 air mi WNW project site (1935) N side San Marcos Pass, about 12 air mi SE project site (1930)	Moderate potential in grassland and savanna on clay soils
Ojai fritillary (*Fritillaria ojaiensis*)	List 1B	March-May Woodland, chaparral on rocky soils	Upper Oso Canyon, about 14 air mi E project site (1961)	Moderate potential in stony grasslands on-site
Southern tarplant (*Centromadia parryi* ssp.	List 1B	July-September	Coastal plain W of Goleta, about 12 air mi	Typically found in coastal grasslands,

P998-12

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summer)		Vernal flats and grassland	S project site (2005)	but project site grasslands and soils closely resemble coastal sites where this species has been found

Some of these species are not the same ones evaluated in the BA, but are included in the checklist prepared by USFWS and in Appendix E of the EA. The BA and EA do not provide much detail on how the field surveys were conducted, stating only that botanical inventories were conducted in accordance with CDFG protocols. Additional information on field methods (number of persons, transect vs. random walk surveys, transect spacing, project site coverage, etc.), is needed to evaluate the thoroughness of the surveys. More importantly, the botanical surveys for the BA and EA were conducted on 7-9 March 2012 and 23-25 April 2012, which was not adequate to note the presence of special-status annual plants in this area at that time. Rainfall totals for the 2012/2013 rainy season were significantly below average and the timing of most storms occurred relatively early in the season. Consequently, many annual wildflowers bloomed earlier than is typical for this area. In addition to the March and April surveys, botanical surveys should have been conducted in January and February in 2012 in order to more completely capture year-to-year variation in floral phenology. Additional botanical surveys should be conducted to more fully evaluate the site status of annual special-status plants.

P998-12 Cont.

Additionally, needlegrass (*Nassella pulchra* and/or *N. lepida*), species of local concern, are likely present on-site and may be extensive enough to meet the criteria for consideration as "native grasslands" (County of Santa Barbara, 2008).

P998-13

Wildlife surveys were conducted on 12-14 Sept 2011 and 16-17 July 2013, the height of the dry season, which is insufficient to adequately characterize wildlife occurrence on-site or use of on-site habitats, including seasonal water features. Additional wildlife surveys, designed to characterize the full range of wildlife resource use on-site, should be conducted from late fall through mid-summer. These surveys should include acoustic surveys for bats, time-constrained or drift fence-pitfall trap surveys for reptiles and amphibians, monthly surveys of seasonal water features (see below), track and camera stations for nocturnal carnivores, time-constrained surveys for birds, and an analysis of raptor use of the site, including owls.

P998-14

Impacts to Oak Trees and Oak Savanna. Oak savanna, an iconic habitat of the California landscape, has been diminished in extent and isolated by development to the point that this plant community is considered threatened and of high priority for conservation by the State of California (Davis, n.d., Brown and Davis, 1990; CDFG, 2002; Sawyer et al., 2008). Indeed, valley oaks, coast live oaks, and blue oaks have been described as the "keystone structures" that govern biodiversity and ecosystem function in savanna habitats (Manning et al., 2006; Tietje and Vreeland, 1997; Tietje et al, 1997). Oak tree density across the project site, while relatively stable over the time period that

P998-15

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aerial photography has been available (1928-present), is severely threatened by lack of recruitment due to competing land uses, including livestock grazing and vineyard expansion. The loss of oak trees across the project site will result in significant impacts to local and regional biodiversity. Given that both Alternatives A and B result in significant loss of individual oak trees and fragmentation of existing oak savanna habitat, these project designs should be interpreted as Class I impacts to these resources at the County and State level of protection.

P998-15 Cont.

Mapping of oak savanna habitat in Fig. 3-4 of the EA appears subjective. The Methods section in the BA does not describe minimum mapping units or provide criteria for distinguishing mapping of non-native annual grassland vs. oak savanna (e.g., inter-tree spacing and canopy cover). For example, several areas on Parcels 2, 3, and 4 in Figure 6 of the BA support oak trees in densities mapped elsewhere on this figure as "oak savanna", but are not mapped as such. As a result, acreages of and impacts to oak savanna habitat on-site have been underestimated (Table 3.4-1).

P998-16

There is no rationale given for translating areas mapped as oak savanna in Figure 6 of the BA into the "RMZ zones" mapped in Figures 2-1 and 2-2 of the EA. What is the basis for determining the size, shape, and location of the RMZs?

Rodents (pocket gophers, ground squirrels, and mice) play a significant role in blue, valley, and coast live oak seeding mortality in Santa Ynez Valley oak savanna and woodland (Tyler et al., 2006; 2008). Alternatives A and B will significantly fragment what is now open oak savanna and annual grassland. This could result in reduced rates of raptor and carnivore predation on rodent populations in the resulting fragments because it may become more difficult for these predators to access the fragments because of increased human presence, noise, and movement barriers. Increased oak seedling predation by rodents in these "protected" habitat fragments could result in long-term or permanent reduction in oak tree recruitment. Recruitment is one of the natural processes that governs persistence of oak savanna habitat, so any factor that inhibits or prevents recruitment runs counter to the stated goals of the RMZs. Given existing trends of little or no recruitment, it is only a matter of time before areas currently supporting oak savanna revert to annual grassland as mature trees die or are intentionally removed and are not replaced. The RMZs should strive to create self-sustaining oak savanna habitat.

P998-17

The EA makes reference to the *Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians* as a "built-in" mitigation measure. However, this ordinance states that, "there will be no loss of oak trees...unless they impede development of Tribal facilities." (pp. 3-27 and 3-28 of EA). Likewise, the mitigation measure proposed in Section 5.4 of the EA will not reduce project-related impacts to individual oak trees or oak savanna habitat to less than significant levels because is lacks specificity, purpose, performance standards, and long-term goals.

P998-18

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A biologically meaningful mitigation measure would include: a) no loss of existing mature oaks on the project site, and; b) restoration of ecosystem function and self-sustainability to existing oak savanna habitat through preservation and enhancement of patch connectivity. Additionally, the geographic coordinates, dbh (diameter at breast height), and canopy diameter of all oak trees on the project site should be mapped in order to establish baseline conditions of current patterns of oak dispersion and age class structure. This would allow a more informed basis for preserving oak savanna and ecosystem function going forward.

P998-18 Cont.

Mitigation measures should include preparation of a comprehensive, biologically-based, long-term oak savanna restoration and preservation program prepared by a qualified biologist (not an arborist, as stated in the EA). The goals of this program should include significantly increasing oak survivorship, recruitment, and self-sustainability throughout the project site through a long-term effort of collecting acorns from existing trees on-site, growing them in a nursery setting until large enough to be planted, and strategically planting them such that they enhance ecosystem function of existing oak savanna habitats that have been degraded by decades of adverse agricultural practices. Whipple et al. (2010) outline such an approach for areas that formerly supported oak savanna but which now support only a few isolated, remnant trees in a semi-urban landscape. Such a program should focus on intensive oak tree planting in areas of the project site proposed for development together with preservation and enhancement of connectivity, function, and genetic integrity of oak savanna habitat. The plan should also include preservation of representative types of oak savanna formed by single species or combinations of species, such as valley oak savanna, blue oak savanna, and coast live oak-blue oak or coast live oak-valley oak savanna.

P998-19

Description of On-Site Drainages. Page 3-8 of the EA does not mention that two major tributaries of Zanja de Cota Creek drain the northwestern and central portions of the project site (Parcels 1,2, and 3). Zanja de Cota Creek is the major water feature of the Los Olivos Hydrologic Area, where the project site is located. Further on, the EA states that the northwestern and western portions of the project site drain to the north and northwest. This is not correct—most of the site drains to the west and southwest. The descriptions in the text are contradicted by Fig. 3-3 in the EA (FEMA Flood Zones), which shows 100-year floodways draining southwestward across Parcels 1, 2, and 3.

P998-20

Seasonal Water Features. The EA does not explain the difference between an, "ephemeral drainage" and a "seasonal wetland swale". According to p. 3-34 in the EA, none of the ephemeral drainages contained water during any of the site visits. Site visits to these ephemeral drainages should have been timed to occur during or immediately following rain events in order to characterize their status and function. Later, the EA states that the seasonal wetland swale in the northeastern portion of the site was inundated during the April 2012 surveys. Under the paragraph, "Habitat Types" on p. 12 of the BA, there is no mention of vernal pools on-site, but Photos 9 and 12 in Figure 7b describe vernal pools in the south-central and southwestern portions of the project site.

P998-21

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The entire evaluation of seasonal water features on-site is summarized in one sentence (p. 12), a map that is too large a scale to adequately show aquatic features (Figure 6), and six photos (Figure 7b). The description, mapping, and analysis of these important resources are inadequate to fully address project-related impacts, which include changes in hydrology, sedimentation, and water quality.

P998-21 Cont.

Impacts to Vernal Pool Fairy Shrimp (VPFS) Critical Habitat. The BA and EA correctly identify the regulatory circumstances involving this species and accurately map Unit 31 of the VPFS Critical Habitat designation as covering the southern half of the project site. In the absence of surveys for this species because the on-site seasonal water features wetlands did not contain water during their site visits, the BA and EA assume that VPFS may occur on-site. However, the EA states on p. 4-12 that, "The 2.13 acres of ephemeral drainages on the project site do not provide adequate habitat for VPFS". This statement has no factual basis without adequate surveys timed to coincide when water is present in these features. VPFS can be found in a variety of seasonal water features, including isolated pools in ephemeral drainages, tire ruts, and other natural and man-made habitats that may be very limited in size (Eriksen and Belk, 1999; Hunt, pers. observ.). Moreover, this species can, under optimal conditions, complete its life cycle in as little as 18 days (Eriksen and Belk, 1999). Consequently, determining presence or absence at a water feature involves regular sampling throughout the winter and spring. At a minimum, site surveys should occur every two to three weeks between December and early May.

Under "*Potential Impacts*" (p. 19), the BA fails to describe the type, location, or severity of potential impacts to VPFS or VPFS habitat. For example, which seasonal wetlands are "...proposed to be impacted."? The primary mitigation measure proposed to reduce potential impacts to VPFS and VPFS habitats is confusing. On p. 19 the BA recommends establishing a 500-foot buffer around wetland habitats, but goes on to allow construction to occur within this zone. The EA reduces this buffer zone to 50 feet (p. 5-5). A 50-foot buffer around wetland features that potentially support VPFS is inadequate to prevent long-term degradation of these habitats from soil erosion and/or sedimentation. Ideally, the hydrological basin contributing to the vernal feature should be protected from development for long-term management of these sites.

P998-22

The EA states that the measures included in the BA, together with additional mitigation measures created in a future Biological Opinion from the USFWS, will reduce potential impacts to less than significant levels. Again, there is no discussion of the nature, timing, location, or severity of potential impacts. The first mitigation measure described in the EA states that, "...the Tribe shall purchase preservation [credits at a two-to-one ratio] and creation credits [at a one-to-one ratio] from a USFWS-approved conservation bank. There is no conservation or creation bank for VPFS in Santa Barbara County, let alone elsewhere in Unit 31. USFWS (2005) shows that the nearest mitigation banks for VPFS are located in the Central Valley (p. II-201). Off-site mitigation will not offset significant

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impacts to critical habitat in Unit 31. Why is there no discussion of creating seasonal water features habitat on-site?

The Recovery Plans for VPFS prepared by the USFWS (USFWS, 1998; 2005) identify historic habitat loss and fragmentation as one of the major threats that have eliminated or degraded 90% of the historic vernal pools along the Central California coast. Alternative A proposes to eliminate 330 acres of VPFS habitat. In fact, impacts to critical habitat would be much greater because of habitat fragmentation that would occur under either development scenario. Approximately 65 acres would be removed under Alternative B. All of this disturbance would occur within the Lake Cachuma Core Area (USFWS, 2005-Fig. III-12a). The primary goal of the 1998 and 2005 USFWS recovery plans was preservation of core areas within critical habitat (p. III-89).

P998-22 Cont.

Overall, the EA fails to adequately describe, locate, or even identify the severity of potential impacts to critical habitat for VPFS habitat. Moreover, the mitigation measures proposed in the EA to offset potential impacts do not rise to any standard of protection. Off-site mitigation for what amounts to very significant loss and fragmentation of core area critical habitat for VPFS is inadequate and inappropriate. Loss and fragmentation of VPFS habitat under either development scenario should be considered Class I.

Impacts to California Red-Legged Frogs (CRLF). The BA and EA correctly asserts that breeding habitat for CRLF is absent from the project site and notes the occurrence of nearby, off-site records from the CNDDB. However, these nearby records document that CRLF occur in the vicinity of the project site. The documents also state that at least 11 natural and man-made water features that could provide breeding habitat for CRLF occur with a mile of the eastern and western boundaries of the project site. Additionally, Santa Agueda Creek, located east of the project site, may provide breeding habitat for CRLF. The documents note that upland habitat on-site is suitable for CRLF. CRLF use upland habitats for foraging and dispersal, and long-range dispersal between breeding sites is a key feature of metapopulation persistence in this species (Bulger et al., 2003; Fellers and Kleeman, 2007).

P998-23

CRLF can move distances greater than the one mile (1.6 kilometer) limit used in the BA and EA. Movements in excess of 1.8 and 1.9 miles through upland habitat between aquatic sites have been documented by Bulger et al. (2003) and Fellers and Kleeman (2007), respectively. Hunt (pers. observ.) also found CRLF in upland habitats up to 1.5 to 2 air miles from the nearest aquatic site. CRLF could disperse into the project site from known and potential sites that are location near the site. These dispersal movements may cumulatively exceed the observed distances noted above as individuals use rodent burrows as short-term or long-term upland refugia in moving to other aquatic sites. Strategic placement of drift fence-pitfall trap lines during the winter and early spring offer the best means of evaluating CRLF use of the project site.

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The EA offers a number of avoidance and minimization (A&M) measures designed to avoid adverse impacts to CRLF during project construction. While these measures might be sufficient to reduce impacts to less than significant levels during construction, they do not address potential impacts caused by project occupancy. For example, finding CRLF on-site during implementation of the A&M measures would mean that project occupancy could result in take of CRLF for the life of the project by interfering with dispersal. Currently, the project site can allow unrestricted movement of CRLF, if present, across the site. Increased potential for take from creating interior roadways (mortality) and barriers to dispersal (interference with movements) could occur for the life of the project. These long-term impacts associated with occupancy cannot be reduced to less than significant levels and must be classified as Class I impacts. P998-23 Cont.

Impacts to Nesting Migratory Birds, Raptors, and Bats. BA and EA make no mention of the known occurrence of the golden eagle on the project site (Hunt, pers. observ.) or, at a minimum, the use of grassland and oak savanna as foraging habitat for this species. Oak trees on-site offer potential raptor nest sites, but the BA makes no mention of seeing raptor nests during site visits.

Loss of individual oak trees and fragmentation of oak savanna would significantly impact roost/nest sites for raptors and entire guilds of other birds. For example, oak trees and oak savanna on the project site support eight species of woodpeckers, including two migratory species (acorn, Nuttall's, Lewis', downy, hairy, northern flicker, Williamson's sapsucker, and red-breasted sapsucker). The oak savanna habitat on the project site represents some of the best remaining habitat for Lewis' woodpeckers, a Watch List species, in the Santa Ynez Valley. Acorn woodpeckers form complex, long-term family units around granary trees, typically valley and blue oaks, which could be eradicated as oak trees are removed under either development scenario. P998-24

Additionally, several species of special-status bats likely forage in oak savanna and/or have seasonal or permanent roosts in oak trees on the project site. These species include: pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*), both of which have established roosts less than two miles from the project site. Loss of oak trees and fragmentation of oak savanna and annual grassland would significantly impact both of these species as well as a host of other bats. Acoustic surveys, conducted at different times of the year, are needed to better characterize use of the site as foraging and roosting habitat for bats. P998-25

Appendix E in the EA lists four species of raptors and 2 two species of migratory birds that were observed on-site during the surveys for the BA, but the discussion of migratory birds on-site on p. 3-40 is cursory and should state that there is more than a "potential [for these species] to nest within the project site". The Cultural Resources section (p. 3-48) states that rodent diggings were 'ubiquitous' across the project site, so there is evidently an abundant prey base for raptors and carnivores. Point-count surveys, conducted at P998-26

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different times of the year, are needed to characterize use of the site as foraging and nesting habitat for migratory birds and raptors.

P998-26 Cont.

Impact of Tribal Government Facilities. The BA and EA do not analyze potential impacts to biological resources caused by locating the proposed 30-acre Tribal Government facilities and parking lot in the approximate center of the project site. In addition to the obvious significant long-term impacts to habitat loss and fragmentation associated with construction of the facility, there are a number of significant, long-term impacts to wildlife associated with operation of the facility, including, but not limited to: increased noise and human presence, night-lighting, trash, and changes to the seasonal hydrology and ecological function of surrounding ephemeral drainages if surface runoff from the facility and parking lot is directed to them.

P998-27

Impacts to Wildlife Movement and Corridors. A tenet of conservation biology is that fragmentation and isolation of formerly extensive habitats is a major contributor to the loss of biodiversity. Consequently, it makes intuitive sense that maintaining habitat connectivity as landscapes are developed offers the best opportunity for conserving plant and animal biodiversity. Habitat corridors are promoted as important features of reserves that allow dispersal between high-quality habitats. This means that corridor location and design are critical to maintaining ecological function of connected habitats and wildlife populations (Sutcliffe and Thomas. 1996; Quintana-Ascencio and Menges, 1996; Meffe, Carroll, et al., 1997; Aars and Ims 1999; Beier and Loe, 1992; Beier and Noss. 1998, Mech and Hallett, 2001; Tewsbury, et al., 2002; Damschen, et al., 2006).

P998-28

At a minimum, the project site provides foraging, nesting, or denning habitat for the following raptors and carnivores: golden eagle, red-tailed hawk, red-shouldered hawk, ferruginous hawk, Cooper's hawk, American kestrel, striped skunk, American badger, long-tailed weasel, bobcat, mountain lion, coyote, grey fox, and black bear. The site provides excellent habitat for their prey, including ground squirrels and other rodents, rabbits and hares, and black-tailed deer. Consequently, much of the project site can be considered a wildlife corridor for these species (and others) moving between similar habitats north, southeast, south, and west of the site. The BA and EA identify one "wildlife corridor"—the NE-SW trending drainage in the vineyard, but grassland and oak savanna can function as a "wildlife corridor", not just riparian areas. Any discussion of "wildlife corridors" should recognize the complexity of this issue. One of the most significant impacts of development of Alternative A or B is its potential effect on wildlife movements.

Page 4-11 of the EA states that Alternatives A and B would not impact native resident or migratory fish, but the document fails to evaluate the effects of increased erosion and sedimentation in Zanja de Cota Creek and other ephemeral drainages on-site that flow into the Santa Ynez River, a steelhead (*Oncorhynchus mykiss*) stream.

P998-29

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Pages 4-11 and 4-37 of the EA contain brief discussions of potential wildlife movement "corridors" on the project site. These discussions have no basis in fact and only vaguely evaluate the potential impacts of project development on wildlife movement. The Alternative B section on "migratory corridors" on p. 4-37 expands this discussion to include "...overland migration through the project site [between] agricultural and annual grassland areas to the southwest, south, and west of the project site." Additionally, it states that, "Alternative B was designed to avoid the ephemeral drainage that provides a migratory corridor between the northern and western portion of the project site." How and why does the EA assume that ephemeral drainages provide the sole or even primary wildlife movement corridors within and through the project site? Although riparian corridors and drainages may connect otherwise disconnected habitats, wildlife movement is not strictly or primarily associated with these corridors. If a goal of Alternative B is to conserve grassland and oak savanna habitat on-site, then the ephemeral drainages, with a suitable habitat buffer around them, could function as landscape elements that foster connectivity between upland habitat patches on-site and similar habitats north, south, and west of the project site, but only if adequate upland habitat buffers (several hundreds of feet) surround each drainage.

In the absence of specific studies, it is better to speak of habitat connectivity and assume that more connected habitats allow for better dispersal of, and therefore persistence of, wildlife and plant biodiversity. In this case, a more thorough analysis of corridor function is necessary. Specifically, the ephemeral drainages could provide movement corridors for some species, but the buffer areas surrounding various drainages will be much more important in creating and maintaining dispersal opportunities for most of the plants and animal species found on-site and in the region. Buffer width is critical in this function. In the absence of specific studies detailing wildlife movement, wider buffers will offer the greatest opportunity for movement of a diverse assemblage of local species with widely disparate body sizes, dispersal ability, and guild ecology, ranging from annual plants, trees, beetles, butterflies, snails, snakes, birds, rodents, and carnivores. P998-30

Barriers to dispersal are the counterpoint to habitat corridors and connectivity. Barriers are species-specific. In the case of ground-dwelling wildlife (snakes, terrestrial birds, owls, rodents, rabbits, deer, and carnivores), the most significant barrier to dispersal to and from the site is Highway 154 because of its width and high likelihood for mortality as animals attempt to cross it or forage alongside it. Armour Ranch Road, Baseline Road, low-density ranchette development northeast of the project site, agricultural development west, northwest, and north of the site, and small-mesh fencing around otherwise open grassland and oak savanna habitat southeast and south of the project site are secondary barriers to unrestricted movement. These barriers are, depending on the species, more or less porous to movements of most ground-dwelling wildlife. Reducing the impacts of these existing barriers involves providing safe and effective means for ground-dwelling wildlife to cross (e.g., wildlife undercrossings).

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The great value of the project site as wildlife habitat is the fact that it provides extensive, connected grassland and oak savanna habitat for a wide variety of plants and animals, especially medium- and large carnivores and raptors whose foraging, breeding, and dispersal habitat is shrinking regionally as their prey base becomes degraded by habitat fragmentation. In this regard, the EA correctly asserts that development of Alternative B would result in less habitat fragmentation and provide more habitat connectivity than Alternative A. However, the design of the development and associated mitigation measures do not reduce impacts to habitat connectivity and wildlife dispersal to less than significant levels. Either development scenario could result in Class I impacts to wildlife movement, and although Alternative B may reduce impacts compared to Alternative A, the environmentally preferable alternative is one that clusters one-acre development parcels in the northwestern corner of the project site and incorporates associated design changes:

- cluster the one-acre development parcels, the proposed Tribal Government Center, and associated roadways and parking lots (approximately 224 total acres) to the northwestern portion of the project site that is currently in vineyard production (approximately 269 acres);
- retain all valley, blue, and coast live trees greater than 6 inches dbh trees in the existing vineyard areas during development and use these trees as "source" trees for re-creating and maintaining "urban oak savanna" in this portion of the project site, similar to that proposed in Guisti, et al. (2005) and Whipple, et al. (2010);
- place the remainder of grassland and oak savanna on the project site under a permanent conservation easement to be used for passive recreational purposes only, e.g., hiking, horseback riding, bird watching, etc.;
- have a qualified biologist create and implement an Oak Savanna Restoration Plan whose goals include retaining all existing oak savanna habitat on-site, increasing oak tree density and recruitment with on-site seed sources, and promoting ecological processes that ensure long-term oak savanna persistence and habitat function (also see comments under "Impacts to Oak Trees and Oak Savanna" above).

P998-30 Cont.

P998-31

P998-32

P998-33

P998-34

References.

Aars, J. and R.A. Ims. 1999. The effect of habitat corridors on rates of transfer and interbreeding between vole demes. *Ecology* 80: 1648-1655.

Beier, P. and R.F. Noss. 1998. Do habitat corridors provide connectivity? *Conservation Biol.*, 12(6): 1241-1252.

Beier, P. and S. Loe. 1992. In my experience: a checklist for evaluating impacts to wildlife movement corridors. *Wildlife Society Bull.*, 20(4): 434-440.

P998-35

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Brown, R.W. and F.W. Davis. 1990. Historic mortality of valley oaks in the Santa Ynez Valley, Santa Barbara County, California, *In*: Proceedings of the symposium on oak woodlands and hardwood rangeland management. Oct 31-Nov 2.

Bulger, J.B., N.J. Scott, and R.B. Seymour. 2003. Terrestrial activity and conservation of adult California red-legged frogs *Rana aurora draytonii* in coastal forests and grasslands. *Biological Conservation*, 110(1): 85-95.

CDFG (California Department of Fish and Game). 2009. Special-Status Animals List for the California Natural Diversity Database (CNDDB). Sacramento, CA. July. 59 pp.

County of Santa Barbara. 2008. Environmental thresholds and guidelines manual. Prep. by the Planning and Development Dept., Santa Barbara. October. 172 pp.

Damschen, E., et al., 2006. Landscape corridors promote plant diversity by preventing species loss. *Science*, in: *ScienceDaily*. 2008. How wildlife corridors work over time. www.sciencedaily.com/releases/2008/12/081201200115.html.

Davis, F.W. n.d. Distribution and status of valley oaks (*Quercus lobata* Nee) in California. www.biogeog.ucsb.edu/projects/sboak/final_report/section1.pdf.

Fellers, G.M. and P.M. Kleeman. 2007. California red-legged frog (*Rana draytonii*) movement and habitat use: implications for conservation. *Journal of Herpetology* 41(2): 276-286.

Guisti, G.A., D.D. McCreary, and R.B. Standiford. 2005. A planner's guide for oak woodlands. Publ. No. 3491, Univ. California, Div. Agriculture and Natural Resources. Oakland, CA. 116 pp.

Manning, A.D., J. Fischer, and D.B. Lindenmayer. 2006. Scattered trees are keystone structures: implications for conservation. *Biological Conservation*, 132: 311-321.

Mech, S.G. and J.G. Hallett. 2001. Evaluating the effect of corridors: a genetic approach. *Conservation Biol.*, 15(2): 467-474.

Meffe, G.K., C.R. Carroll, et al. 1997. Principles of conservation biology, 2nd ed. Sinauer Associates, Inc., Sunderland, MA. 729 pp.

Quintana-Ascencio, P.F. and E.S. Menges. 1996. Inferring metapopulation dynamics from patch-level incidence of Florida scrub plants. *Conservation Biol.*, 10: 1210-1219.

P998-35
Cont.

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Sutcliffe, O.L. and C.D. Thomas. 1996. Open corridors appear to facilitate dispersal by ringlet butterflies (*Aphantopus hyperantus*) between woodland clearings. *Conservation Biol.*, 10(5): 1359-1365.

Tewsbury, J.J., et al. 2002. Corridors affect plants, animals, and their interactions in fragmented landscapes. *Ecology* 99(20): 1223-1226.

Tibor, D. (ed.). 2001. Inventory of rare and endangered plants of California, 6th ed. California Native Plant Society, Special Publ. No. 1, Sacramento, CA. 387 pp.

Tietje, W.D. and J.K. Vreeland. 1997. The use of plywood coverboards to sample herpetofauna in a California oak woodland. *Trans. Western Section of the Wildlife Soc.*, 33: 67-74.

_____, N.R. Siepel, and J.L. Doekter 1997. Relative abundance and habitat associations of vertebrates in oak woodlands in coastal Central California, pp. 391-399 *In*: Management of Hardwood Rangeland Resources in California, USDA Forest Service Genl. Tech. Rept. PSW-GTR-160.

Tyler, C.M., B. Kuhn, and F.W. Davis. 2006. Demographic and recruitment limitations of three oak species in California. *Quarterly Review of Biol.*, 81(2): 127-152.

Tyler, C.M., F.W. Davis, and B.E. Mahall. 2008. The relative importance of factors affecting age-specific seedling survival of two co-occurring oak species in southern California. *Forest Ecology and Mgmt.*, 255(7): 3063-3074.

USFWS. 1998. Recovery plan for vernal pools of southern California. Portland, OR. 113 pp, plus appendices.

_____. 2005. Recovery plan for vernal pool ecosystems of California and southern Oregon. Portland, OR. xxvi + 606 pp.

Whipple, A., R.M. Grossinger, and F.W. Davis. 2010. Shifting baselines in a California oak savanna: Nineteenth Century data inform restoration scenarios. *Restoration Ecology*. 30(2): 130-144.

P998-35 Cont.

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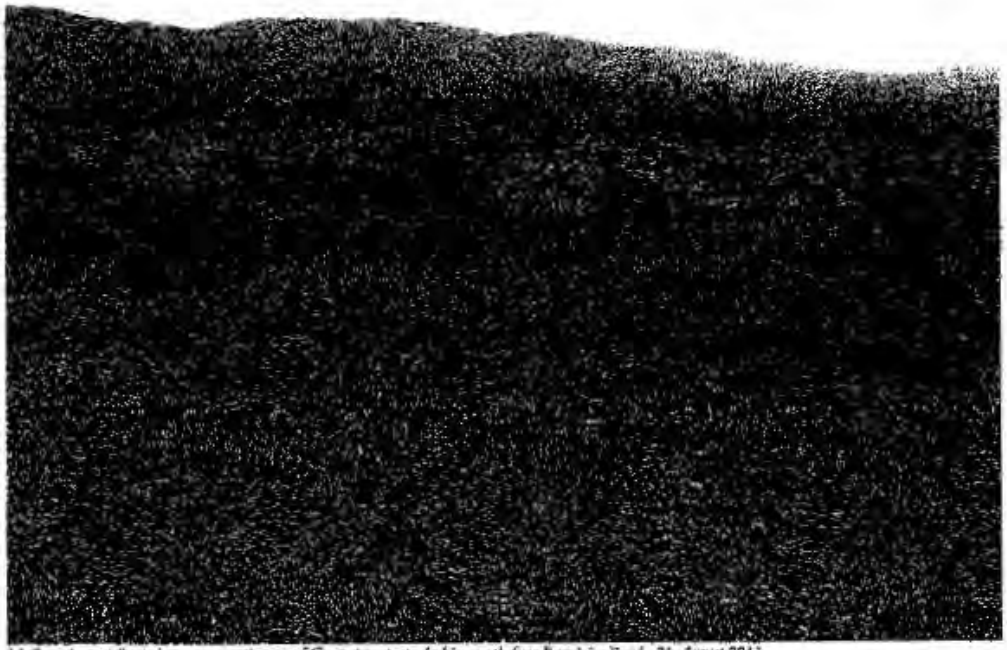
ENVIRONMENTAL SETTING FOR PROPOSED CAMP 4 DEVELOPMENT PROJECT, SANTA YNEZ VALLEY, SANTA BARBARA COUNTY, CALIFORNIA



Valley oak-coast live oak savanna, east-center of Camp 4 property, looking south from Baseline Road. 21 August 2013.

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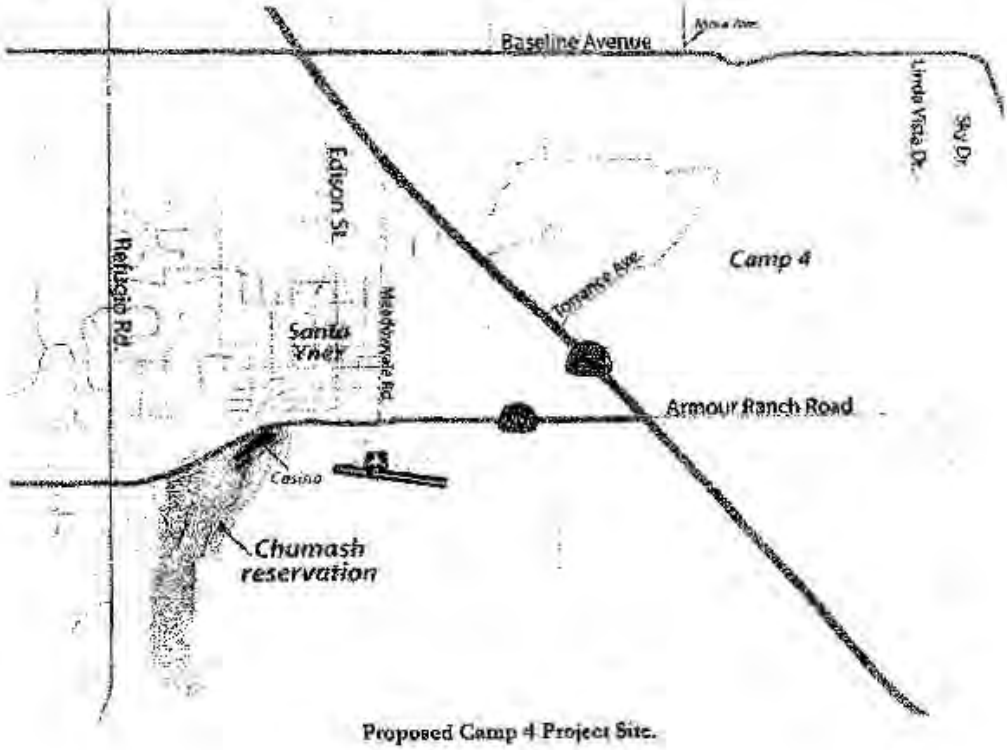
13 September 2013

Environmental Setting for Proposed Camp 4 Development Project, Santa Ynez Valley, Santa Barbara County, California

This document summarizes the environmental baseline for the proposed Camp 4 Development Project, located in the eastern Santa Ynez Valley, northeast of the junction of Highway 154 and Highway 246 (Fig. 1).



Proposed Camp 4 Project Site.

Methodology. The following description of vegetation and plant communities on the project site is based upon site visits conducted by Lawrence E. Hunt in August and September 2013 along public roadways around the perimeter of the southern, western, northern, and portions of the eastern sides of the project site. In total, approximately 75% of the site was visible with binoculars from these perimeter roads. Aerial photographs of the project vicinity dating from 1928 to 2013 were consulted to gain insight into past land use practices within and around the project site (County of Santa Barbara, 2013; GoogleEarth, 2013).

Pre-existing data sources were consulted to gain insight into plant and animal occurrences from the area. These sources included the California Natural Diversity Data Base for areas within and surrounding the project site (Santa Ynez, Solvang, Figueroa Mountain, San Rafael Mountain, Los Olivos, San Marcos Pass, Zaca Creek, Gaviota, Dos Pueblos Canyon, and

P998-36

Tajiguas quadrangles), discussions with local botanists and wildlife biologists familiar with the area, general floristic and faunal references (Smith, 1998; Hickman, 1993; Lehman, 1994; Stebbins, 2003; Jennings and Hayes, 1994; Jameson and Peeters, 2004), and pertinent scientific and environmental documents (Aspen Environmental Group, 1996; Hunt and Associates, 2011, 2012) conducted in this region. A complete list of references consulted are presented at the end of this document

P998-36 Cont.

Land Use. The following discussion is based on interpretation of aerial photographs taken in 1928, 1938, 1964, 1994, and 2013. Surprisingly, the project site has changed very little during this 85-year range. Livestock grazing (rangeland) is the dominant, recurring land use during this time up to present-day. The northeastern and northern portions of the site were dry-farmed up until the mid-1960s, then converted to irrigated row crops (see current site photographs in Appendix 1).

1928: These may be the earliest aerial photographs of the future project site. The project site is open space, used for grazing and dry farming. Dry farming is evident in the NW portions of the site that today (2013) are under cultivation. There are more oaks present throughout the northern half of the site, including the dry-farmed areas, than at present. Zanja de Cota Creek is better-developed than today. There is no Highway 154. A roadway that follows the present-day track of Highway 246 terminates at today's intersection of Highways 246 and 154. A roadway that follows the present-day track of Base Line Avenue is plainly visible in these photographs. The Santa Agueda Creek floodplain is open space—no development. Portions of the floodplain of the Santa Ynez River appear to be under cultivation.

1938: A roadway following the track of present-day Highway 154 is visible; other main roadways are still present. The dominant land use across most of the future project site is livestock grazing, except in NW corner, which is still dry-farmed. Most of the trees visible on the project site in these photos are still visible in 2013 aerial photographs. The Santa Agueda Creek floodplain is still mostly ranchland, but there is some dry farming in the areas currently occupied by low-density residential housing east of the project site. The areas north of the future project site are dry farmed, but in general, there is unbroken open space between the foothills to the north, across the project site, and the Santa Ynez River to the south.

P998-37

1964 (Shipman, 1972): Northwestern corner of future project site is under cultivation (formerly dry-farmed). Other northern portions of site also are dry-farmed, but *the site is basically in the same condition as today*. There is no residential development in the Santa Agueda Creek floodplain east of the project site, but some parts of the floodplain are under cultivation. Tree density is basically what is visible today in aerial photographs.

1994 and 2013 (Figs. 2 and 3): Land use practices within the project site are surprisingly similar to those found in the 1928-1964 aerial photographs. Surrounding land use changes include large expansion of cultivated land north, west, and east of the site, and expansion of low-density residential development north and east of the site.

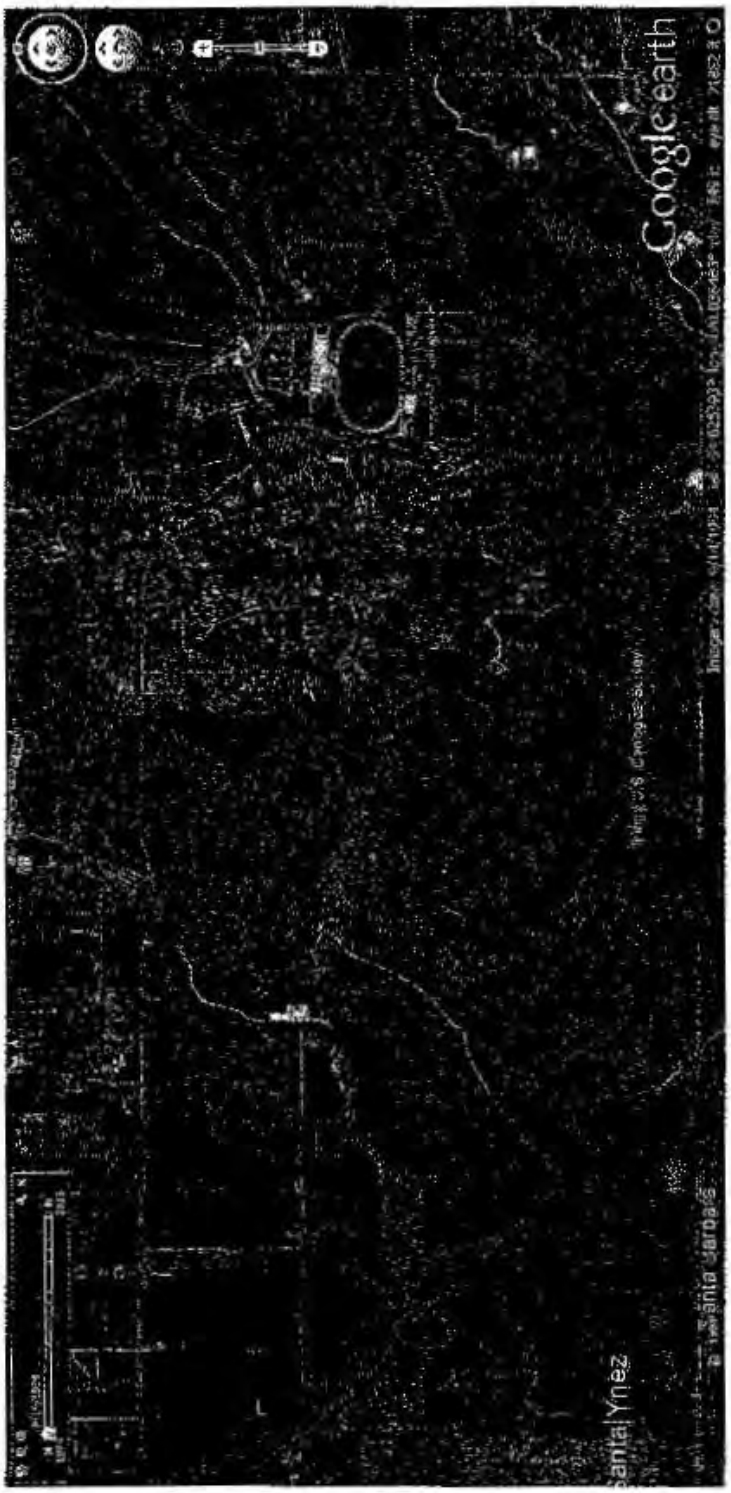


Figure 2. Land use in and around Camp 4 project site, September 1994.

P998-37
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Figure 3. Land use in and around Camp 4 project site, April 2013.

P998-37
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Geology and Soils. Jennings (1991) maps the geology of the area including the project site as Quaternary (Pliocent-Pleistocene), non-marine, mostly unconsolidated alluvium and terrace deposits. The rolling hills in the northern and central portions of the project site are composed of non-marine Paso Robles Formation deposits of Plio-Pleistocene age (2-5 mybp), with younger alluvium throughout the southern portions of the site. These terrace deposits (old stream and floodplain alluvium) are dissected by numerous small gullies and some larger streams (e.g., Santa Agueda Creek) that drain to the Santa Ynez River. The Miocene (5-24 mybp), marine Monterey Formation is exposed in the bottom and side walls of many of the drainages that have cut below these younger terrace deposits (Norris, 2003).

Surface elevations range across the project site from about 675 feet above sea level in the southeastern portions to approximately 845 feet on hilltops along a ridgeline in the south-central portion of the site.

Soils in the project site are derived from this parent material and are described by Shipman (1972) as consisting of three series:

Santa Ynez Series: The Santa Ynez soil series (SnC) consists of moderately well-drained, gravelly, fine sandy loams underlain by gravelly clay subsoils. These soils developed on old water-deposited terraces, commonly in swales. This soils type is restricted to a few drainages and swales and an upland area in the southwestern portions of the project area, north of the junction of Highways 154 and 246. Permeability is very slow. Depth to the clay subsoil is 20-30 inches and on gentle slopes a perched water table forms above the clay subsoil after rains that may be conducive to vernal pool formation. Olson (1992) describes vernal pools in this soil type from sites located approximately 2-3 air miles east of the southeastern edge of the project site.

P998-38

Chamise Series: The Chamise series consists of well-drained soils that developed over gravelly beds of silt and clay and sandy, water-deposited materials. These soils contain a large number of water-rounded fragments of Monterey Shale and are on dissected high terraces. Chamise shaly loam (ChF) occurs on dissected, old terraces throughout the central portion of the project site. Permeability is moderately slow and runoff is rapid. The subsoil of this soil type consists of a very sticky, plastic clay that may function as a hardpan layer in vernal pool formation. Olson (1992) describes vernal pools in this soil type on Sedgwick Ranch, approximately three air miles north of the northern edge of the project site.

Positas Series: The Positas series consists of well-drained fine, sandy loams with a clay subsoil. These soils occur throughout the upper Santa Ynez Valley on smooth, bench-like terraces that are broken by narrow, steep-sided drainages. Positas fine sandy loam (PtC, PtD, and PtE variants, depending on slope) occurs throughout the project site. Permeability is very slow and in a representative soil profile of this series, the subsoil is a heavy, plastic clay that forms the hardpan beneath vernal pools. The distribution of the PtE soil variant in the southern half of the site broadly coincides with the mapped limits of Critical Habitat Unit 31 for the vernal pool fairy shrimp (*Branchinecta lynchi*), a federally-listed vernal pool crustacean (USFWS, 2006).

Vegetation Alliances (Plant Communities). The following descriptions of plant communities observed within the 1,433-acre project site are based on field observations

P998-39

from public roads around the perimeter of the site and analysis of recent aerial photographs. Because the site could not be accessed, these descriptions are necessarily general. Based on these observations, the project site supports several major vegetation alliances. Vegetation alliances are based on recurring associations of dominant plant species and are used by the National Vegetation Classification System and the Manual of California Vegetation (CDFG, 2002; Barbour et al., 2007; Sawyer et al., 2008) to provide specific descriptions of plant communities.

***Bromus (diandrus, hordeaceus)-Brachypodium distachyon* Semi-Natural Stand (Non-Native Annual Grassland).** This is the most common vegetation alliance in the project site, covering all areas that have not been converted to agriculture. It occurs as an understory in oak savanna and as a distinct plant community in areas that historically may have been oak savanna, but which, through a combination of intentional removal and/or incompatible agricultural practices, have lost oak trees.

Because the field observations that form the basis for this report were conducted in the dry season, it is possible that this vegetation alliance could be defined on the basis of annual native indicator species (e.g., *Deinandra fasciculata* alliance or *Eschscholtzia (californicus)* alliance of Sawyer et al., 2008). Representative understory species observed from the perimeter roads around the project site include: rip-gut brome (*Bromus diandrus*), soft chess (*B. mollis*), red brome (*Bromus madritensis* subsp. *rubens*), wild oats (*Avena* sp.), redstem filaree (*Erodium cicutarium*), doveweed (*Eremocarpus setigera*), narrow-leaved milkweed (*Asclepias fasciculatus*), broad-leaved milkweed (*Asclepias eriocarpa*), star-thistle (*Centaurea* sp.), telegraph weed (*Heterotheca grandiflora*). Patches of native grasslands (e.g., *Nassella* spp.) may be present on-site, but could not be observed or evaluated given the constraint on site access.

P998-39
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Ruderal vegetation is non-native and some native grasses, forbs, and some shrubs that share the ability to rapidly colonize disturbed sites. These species are also common elements of non-native annual grassland and may include: broad-leaved filaree (*Erodium botrys*), redstem filaree (*Erodium cicutarium*), scarlet pimpernel (*Anagallis arvensis*), several species of mustards (*Brassica* spp.), various species of clover (*Trifolium* spp.), wild radish (*Raphanus sativa*), vetch (*Vicia* sp.), dock (*Rumex* sp.), smilo (*Pipatherum miliaceum*), telegraph weed (*Heterotheca grandiflora*), Russian thistle (*Salsola tragus*), and horehound (*Marrubium vulgare*).

***Quercus lobata-Quercus agrifolia*-Grass Alliance.** This vegetation alliance describes an association between valley oak, coast live oak, and grassland and covers most of the project area. This alliance is characterized by widely scattered valley oaks (*Quercus lobata*) (generally on deeper terrace soils) and coast live oak (*Quercus agrifolia*) (generally on shallower soils on slopes), with an understory of non-native annual grassland. For the purposes of this document, this alliance is called oak savanna and includes an understory of annual grassland (see discussion of grassland alliance). This alliance is classified as having high conservation priority by the State of California (CDFG , 2002).

The quality of oak savanna habitat varies widely across the project site, from relatively densely arboreal savanna in the central and northwestern portions, to widely spaced mature trees that are remnants of formerly more dense savanna over much of the southern and eastern half of the site. Long-term agricultural practices (grazing, dry farming, and row crop agriculture) have reduced oak tree density, eliminated oaks, and significantly reduced oak recruitment for decades. The observed result today are widely scattered, very old trees with very low or no recruitment. Over time, savanna habitats have been and are converting to non-native annual grassland.

Along the north-facing slopes of a central ridgeline that runs west-east across the north-central portion of the site, the density of coast live oaks and valley oaks is higher, almost approaching a woodland canopy structure in places. The northwestern portion of the project site is currently under cultivation, mostly as vineyard or clover/alfalfa production. The vineyards still support several dozen mature valley and coast live oaks.

***Artemisia californica-Eriogonum fasciculatum* Alliance.** Small, highly disjunct patches of this regionally widespread vegetation alliance occur on some north-facing slopes in the project site. Dominant species (visible with binoculars) include: California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), coyote bush (*Baccharia pilularis*), coast sunflower (*Encelia californica*), coast goldenbush (*Isocoma menziesii*), and poison oak (*Toxicodendron diversilobum*).

P998-39
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***Baccharis salicifolia* Shrubland Alliance.** This alliance occurs in seasonal and intermittent drainages and drainage swales, such as Zanja de Cota Creek, Santa Agueda Creek, and along the Santa Ynez River floodplain. Stands usually form open shrublands or thickets in riparian corridors with coyote bush (*Baccharis pilularis*), tree tobacco (*Nicotiana glauca*), sandbar willow (*Salix exigua*), arroyo willow (*S. lasiolepis*), elderberry (*Sambucus mexicana*). Trees, represented by coast live oak (*Quercus agrifolia*) and valley oak (*Q. lobata*), are scattered along the edges and top-of-bank along these drainages. The herbaceous layer is sparse to non-existent.

Southern Vernal Pool Alliance. See discussion below under ***Special-Status Biological Resources.***

P998-40

General Wildlife Resources. The predominant wildlife habitat on-site is grassland and oak savanna and this habitat is extensive and connected. Consequently, the project site is expected to support a broad diversity of animal species. Common wildlife species expected to inhabit open grassland include: western fence lizard, southern alligator lizard, western skink, common kingsnake, gopher snake, mourning dove, western kingbird, common raven, northern mockingbird, European starling, house finch, turkey vulture, American kestrel, red-tailed hawk, long-billed curlew, ornate shrew, black-tailed jackrabbit, California ground squirrel, California vole, Botta's pocket gopher, western harvest mouse, coyote, grey fox, bobcat, long-tailed weasel, American badger, and black-tailed deer.

P998-41

Oak savanna and oak woodland habitat occurs extensively in the northern, central, and southwestern portions of the project site and these open woodlands are known to support a diverse resident fauna that overlaps broadly with grassland fauna. Depending on ground

cover, cover objects, and proximity to seasonal drainages, amphibians such as black-bellied slender salamander, arboreal salamander, ensatina, western spadefoot, Pacific tree frog, and western toad are expected to inhabit oak savanna in the project site. Some of the more common reptiles known to frequent this habitat include southern alligator lizard, western fence lizard, western skink, common kingsnake, ringneck snake, gopher snake, American kestrel, red-tailed hawk, white-tailed kite, western kingbird, California quail, yellow-billed magpie, acorn woodpecker, Lewis's woodpecker, California towhee, American robin, American crow, European starling, house finch, Virginia opossum, raccoon, Botta's pocket gopher, broad-footed mole, Audubon's cottontail, brush rabbit, California ground squirrel, deer mouse, brush mouse, California mouse, dusky-footed woodrat, striped skunk, coyote, bobcat, black bear, mountain lion, and black-tailed deer.

P998-41 Cont.

Patches of scrub habitat on-site are small and disjunct, but include riparian scrub along seasonal drainages. These habitats are expected to support Pacific treefrog, coast horned lizard, southern alligator lizard, California quail, Anna's hummingbird, wrentit, bushtit, Bewick's wren, western scrub-jay, California towhee, American kestrel, and brush rabbit.

Seasonal water features may be used by a wide variety of wildlife and they provide specialized habitat for many plant and animal species. Wildlife that may occur in seasonal water features on-site include one or more species of vernal pool crustaceans (e.g., fairy shrimp), western spadefoot, Pacific treefrog, western toad, long-billed curlew, and killdeer.

Special-Status Biological Resources. This section summarizes the distribution and status of plant, wildlife, and aquatic species that are known from or potentially occur in the project area. These species are listed or proposed for listing under Federal and State Endangered Species Acts, as well as species recognized as Rare by the California Native Plant Society (Tibor, 2001), or are considered Species of Special Concern by the California Department of Fish and Wildlife (CDFG, 2009; CNDDB, 2013). The status and known or potential occurrence of special-status plants and animals in and around the project site is summarized in Tables 1 and 2, respectively. There are potentially three special-status plant communities on-site (see following discussion).

P998-42

Special-Status Plant Communities. Vernal wetlands, if present, belong to the ***Southern Vernal Pool Vegetation Alliance*** and would be part of the Santa Barbara Vernal Pool Region of Keeler-Wolf et al. (1998) and Sawyer et al. (2008, and references therein). This vegetation alliance is considered to be of high conservation priority by the State of California (CDFG, 2002). Although the project site does not support any permanent drainages or well-developed riparian corridors, the tablelands throughout the central and southern portions of the site are dissected by a series of seasonal swales and small, unnamed seasonal drainages that generally run southward and southwestward to the Santa Ynez River. Tributaries of Zanja de Cota Creek, the largest on-site drainage, run northeast to southwest across the northwestern portion and east to west across the center of the site. Santa Agueda Creek runs north to south approximately 0.9 air miles east of the eastern edge of the project site. The Santa Ynez River runs east to west approximately 1.3 air miles south of the southern edge of the project site (Fig. 4).

P998-43

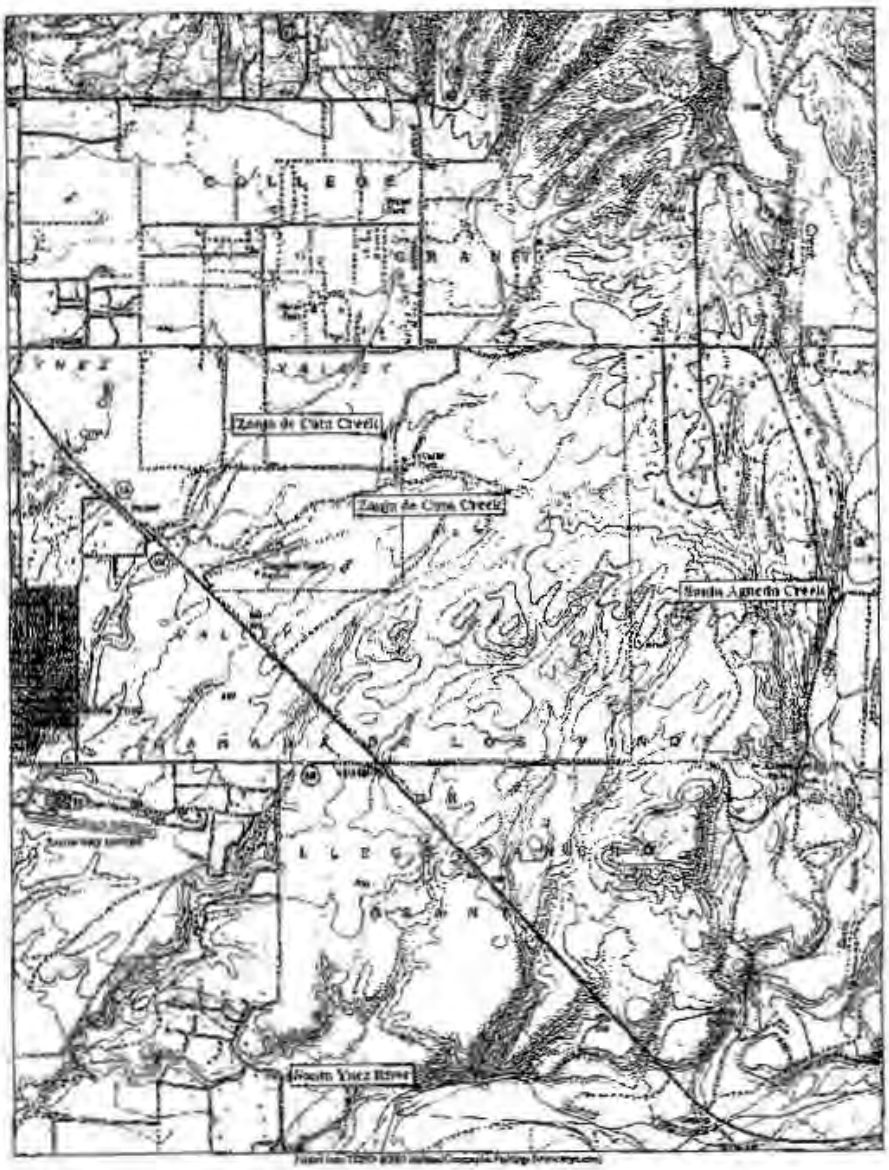

Figure 4. Drainages on and around project site. Note number of unnamed swales and drainages running northeast to southwest across project site. These drainages may support seasonal water features of biological interest. Approximate site boundaries are indicated by red line.

The presence of vernal wetlands or other seasonal water features occur on-site could not be determined by observations from the perimeter observation points, but there is strong circumstantial evidence that the project site supports these special-status resources. For example, Olson (1992) describes vernal pools on the University of California (UC) Sedgwick Ranch Natural Reserve that are located approximately 2-3 air miles north of the project site

P998-43
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on the same soil type that occurs extensively on the project site, Chamise shaly loam (ChF). The USFWS mapped Critical Habitat Unit 31 the federally-listed vernal pool fairy shrimp (*Branchinecta lynchi*) to include the southern half of the project site (USFWS, 2006). Other protected fairy shrimp, e.g., *Linderiella occidentalis*, are known from vernal pools in the region (Table 2). Swales and some of the more well-defined drainage channels, including Zanja de Cota creek and its tributaries, may support seasonal wetlands or seasonal water features that may provide habitat for facultative and/or obligate vernal pool flora and fauna.

These wetlands are potentially regulated by State- and or Federal agencies. Formal wetland delineations are necessary to determine their status and map the wetland/upland boundary within each feature. Such delineations were beyond the scope of work of the present document, but should be investigated further if future development could affect these drainages and/or their respective watershed slopes.

The ***Valley Oak-Coast Live Oak-Grass Vegetation Alliance***, which occurs over much of the project site, is classified as having high conservation priority by the State of California (CDFG, 2002). Additionally, individual coast live oaks and valley oaks are protected by County regulations, which also recognize the local and regional importance of oak savanna and oak woodlands in maintaining biodiversity in the region (County of Santa Barbara, 2008). Large numbers of mature coast live oak and smaller numbers of mature valley oaks are scattered throughout the project site. These trees are integral structural components upon which much of the animal biodiversity found on-site depends because they provide cover, food, roosting, and/or nesting sites. For example, several large oaks scattered throughout the North and South parcels are "granary trees", i.e., trees used by family groups of acorn woodpeckers as acorn storage sites and around which these family groups focus their activities for many decades. Valley oaks and coast live oaks are slowly disappearing from the project site because old trees die and are not replaced by recruitment. The gradual loss of oaks transforms oak savanna to non-native, annual grassland, significantly lowering biodiversity and degrading the character of the landscape.

P998-43
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Native Grassland. Native grasses may be present on-site, but could not be evaluated given the limitations on site access. If present, patches of native grasses would have to be analyzed to see if they meet minimum County thresholds for classification as "native grasslands. The County's Environmental Thresholds and Guidelines Manual defines native grasslands on the basis of density (>10% relative cover) and areal extent (>0.25 acres of >10% relative cover). The Manual defines relative cover as, "the cover of a particular species as a percentage of total plant cover of a given area." The Manual also instructs that, *"Native grasslands which are dominated by perennial bunch grasses such as purple needlegrass (Stipa pulchra) tend to be patchy (the individual plants and groups of plants tend to be distributed in patches). Therefore, for example, where a high density of small patches occurs in an area of one acre, the whole acre should be delineated if native grassland species comprise 10 percent or more of the total relative cover, rather than merely delineating the patches that would sum to less than one acre." Removal or disturbance to a patch or patches of native grasses less than 0.25 acres, which is clearly isolated and is not part of a significant native grassland or an integral component of a larger ecosystem, is usually considered insignificant."* (County of Santa Barbara, 2008).

Special-Status Plants. Table 1 lists rare, threatened, or endangered plants that are known from the project region and potentially may occur on the project site because it contains suitable habitat.

Table 1. Rare, Threatened, and Endangered Plants Known From or Potentially Occurring in Project Site.

Common Name (Scientific Name)	CNPS Listing Status*	Flowering Time and Habitat	Nearest Known Occurrence	Potential for Occurring in Project Site
Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)	List 1B	February-June Vernal pools and vernal flats	Edge of Hwy 154 between Santa Ynez River and San Lucas Creek, about 2 air mi SE project site (1997)	Moderate to high potential in stony grasslands in central and southern portions of project site
Davidson's saltscale (*Atriplex serenana* var. *davidsonii*)	List 1B	April-October Coastal sage scrub on alkaline soils	Near Hwy 101, N of runoff to Zaca Canyon, about 7 air mi NW project site	Low potential; if present, would occur in coastal sage scrub, which is uncommon on project site
Dwarf calycadenia (*Calycadenia villosa*)	List 1B	May-October Chaparral, woodland, grassland, seeps	Old record for vicinity of Los Alamos; about 6 mi NW of project site (no date)	Moderate potential in grasslands on project site
Hoover's bent grass (*Agrostis hooveri*)	List 1B	April-July Chaparral, oak woodland, grassland	Upper west fork of Ballard Cyn., approx. 3.5 air mi NW project site (no date)	Moderate to High potential in grassland and savanna on-site
Late-flowered mariposa lily (*Calochortus weedii vestus*)	List 1B	June-August Chaparral, woodland, often on serpentine	San Marcos Pass, E of summit, about 12 air mi SE project site (1955) Painted Cave Road, S of jct E. Camino Cielo, about 14 air mi SE project site (2006) E Camino Cielo at Laurel Springs, about 13 air mi SE project site (2006)	Moderate potential in oak savanna on-site, but all known occurrences are in montane areas surrounding the Santa Ynez Valley
Mesa horkelia (*Horkelia cuneata* subsp. *puberula*)	List 1B	February-September Chaparral, oak woodland, coastal sage scrub, and sand hill scrub on sandy soils	Solomon Hills approx. 3.3 air mi SE jct Clark Ave x Hwy 101, about 10 mi NW project area	Low potential; soils on-site may be unsuitable for this species (clays or silts
Mile's milk-vetch (*Astragalus didymocarpus* var. *milesianus*)	List 1B	March-June Coastal sage scrub on clay soils	2.5 mi NW Buellton, approx. 7.5 air mi WNW project site (1935)	Moderate potential in grassland and savanna on clay soils

P998-43
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Comment Letter P998 (Cont.)

			N side San Marcos Pass, about 12 air mi SE project site (1930)	
Needlegrass (*Nassella pulchra* and/or *N. lepida*)	Local Concern	February-June	Grassland; coastal sage scrub and chaparral, oak savanna	High potential of occurring on-site
Ojai fritillary (*Fritillaria ojaiensis*)	List 1B	March-May Woodland, chaparral on rocky soils	Upper Oso Canyon, about 14 air mi E project site (1961)	Moderate potential in stony grasslands on-site
Round-leaved filaree (*Erodium macrophylla*)	List 2	March-May Coastal sage scrub and grassland	Sedgwick Ranch (UC Natural Reserve), 2.3 air mi W of summit of Figueroa Mountain, about 7 air mi NNW project site (2008)	Moderate potential in grassland on-site
Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*)	List 1B	May-September Coastal sage scrub and chaparral	Alamo Pintado Creek, 7-8 mi N Los Olivos, about 10-11 air mi NW project site (1961)	Low potential because of lack of coastal sage scrub habitat
Santa Lucia dwarf rush (*Juncus luciensis*)	List 1	May-July Vernal pools and vernal flats	3-5 mi W San Marcos Pass along W Camino Cielo, about 8-10 air mi SE project site (1956)	Moderate potential in vernal flats or other seasonal water features associated with swales and seasonal drainages on-site
Saw-grass (*Cladium californicum*)	List 2	April-July Freshwater marsh, seeps, seasonal wetlands	Vernal wetland off Price Canyon Rd, NE of Los Alamos, about 3.5 mi NW of project area	Moderate potential in vernal flats or other seasonal water features associated with swales and seasonal drainages on-site
Southern tarplant (*Centromadia parryi* ssp. *australis*)	List 1B	July-September Vernal flats and grassland	Coastal plain W of Goleta, about 12 air mi S project site (2005)	Typically found in coastal grasslands, but project site grasslands closely resemble coastal sites where this species has been found
Umbrella larkspur (*Delphinium umbraculorum*)	List 1B	April-June Coastal sage scrub and chaparral	Alamo Pintado Creek, approx. 7 mi N Los Olivos, about 10 air mi NW project site (1962) Lower Oso Cyn, N of Santa Ynez River near Los Prietos Boys Camp, about 10 air mi ESE project site (1962) Spring between Cachuma Saddle and McKinley Mtn, about 10 air mi NE project site (1976)	Low potential because of lack of coastal sage scrub on-site

P998-43
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Comment Letter P998 (Cont.)

White-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*)	List 1B	June-August Coastal sage scrub, chaparral, and woodland	Camino Cielo btw San Marcos Pass and Paradise Cyn Rd, about 10 air mi SE project site (1964)	Low potential because of lack of suitable coastal sage scrub on-site

* ***CNPS Status codes:***

List 1B = species classified as rare-threatened, or endangered in California and elsewhere
List 2 = species classified as rare, threatened, or endangered in California but more common elsewhere.
List 3 = rare, need more information on distribution and abundance.
Local Concern = Species uncommon or endemic to Santa Barbara County.

P998-43
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Comment Letter P998 (Cont.)

Table 2. Rare, Threatened, and Endangered Wildlife Known From or Potentially Occurring in Project Region.

Common Name (Scientific Name)	Regulatory Status*	Habitat	Nearest Known Occurrence	Distribution and Status in Project Site
INVERTEBRATES				
California linderiella (*Linderiella occidentalis*)	SSC	Vernal pools; man-made, seasonal water features, including stock ponds and ditches	Cachuma Canyon near Lake Cachuma, about 5 air mi E project site (Eriksen and Belk, 1999)	Moderate potential in vernal wetlands and other seasonal water features on-site
San Diego fairy shrimp (*Branchinecta sandiegonensis*)	FE	Vernal pools; man-made, seasonal water features, including stock ponds and ditches	Coastal plain W of Goleta, about 12 air mi S project site (Fugate, 1993)	Moderate potential in vernal wetlands and other seasonal water features on-site
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT	Vernal pools; man-made, seasonal water features, including stock ponds and ditches	Cachuma Canyon near Lake Cachuma, about 5 air mi E project site (Eriksen and Belk, 1999) 1 air mi NW and 0.25 air mi SW jct Dominion Road x Circuit-Garey Road, eastern Santa Maria Valley, about 18 air mi NW project site (Hunt, pers. observ., 2000, 2001) UPRR ROW approx. 0.5 mi W Dos Pueblos Cyn, W of Goleta, about 12 air mi S project site (Hunt, pers. observ., 2001)	Moderate to high potential in vernal wetlands and other seasonal water features on-site
FISHES				
Southern steelhead (*Oncorhynchus mykiss*)	FE	Permanent and intermittent streams and rivers	Formerly occurred in Zaoja de Cota Creek in 1930s (DFG, 1934; Becker, 2007); other tributaries in vicinity; main stem of Santa Ynez River	Potential impacts to this species from proposed project as it affects the hydrology, sedimentation, and pollution of Zaoja de Cota Creek
AMPHIBIANS				
Western spadefoot	SSC	Grassland, oak savanna	Alkios Cyn Road at W edge of	Moderate potential in vernal

(*Spea hammondii*)			South Parcel (1987-UCSB specimen) and at several sites within 2 miles SW and W of project area (2000-2009) Alamo Pintado Canyon, about 3 air mi WNW project site (no date – sighting, UCSB record)	wetlands and other seasonal water features on-site. Man-made ponds and lakes B of project site may provide breeding habitat for this species
California red-legged frog (*Rana draytonii*)	FT	Intermittent and perennial streams and ponds, oak woodland, chaparral, grassland	Zaca Creek, W jct Hwy 101 x 154, about 6 air mi NW project site (Hunt, pers. observ., 1999) Santa Ynez River, 2 mi W Solvang, about 7 air mi WSW project site (2007) Zaca Creek near Jonata Park Rd, about 6 air mi W project site (2000) Tributary of Santa Ynez River, 1 mi SE jct Hwy 246 x 154 (= Zanja de Cota Creek), about 1 air mi W project site (2003) Quiota Creek, 3 mi S Santa Ynez, about 4 air mi W project site (2002)	Moderate potential; suitable breeding habitat is apparently absent on-site, but suitable man-made breeding sites occur several hundred feet E of project site; CRLF occur in main stem Santa Ynez River and probably occur in tributaries such as Zanja de Cota Creek; these aquatic sites are broadly connected to upland grassland and oak savanna habitats on the project site, which provide foraging and oversummering habitat for frogs
REPTILES				
Coast horned lizard (*Phrynosoma coronatum*)	SSC	Found in sand hills, grassland, open scrub, and open woodland habitats	Santa Ynez River floodplain between Lake Cachuma and Buellton, about 2-5 air mi S and SW of project site (Hunt, pers. observ., 1998-2011) Solomon Hills, approx. 3.3 air mi SE jct Clark Ave x Hwy 101 in Nov 2010 (Hunt, pers. observ), about 10 air mi NW project site	Moderate potential in oak savanna and grassland areas on-site

P998-44
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Comment Letter P998 (Cont.)

			Cachuma Saddle, about 7 air mi NE project site (1980)	
California legless lizard (*Anniella pulchra*)	SSC	Found in friable, sandy soils in coastal dunes, dune scrub, chaparral, and woodland	Sedgwick Ranch (UC Natural Reserve), about 6.5 air mi NNW project site (1999) Figueroa Mtn Rd, about 3 mi N Los Olivos, about 6 air mi NNW project site (2000) Tequepis Canyon, N slope Santa Ynez Mtns, about 5 air mi SE project site (Hunt, pers. observ., 1988)	Low potential; on-site soils have significant silt and clay component as consequence of derivation from Monterey Shale
Coast patch-nosed snake (*Salvadora hexalepis virgultea*)	SSC	Found in sand hills, grassland, savanna, and open scrub habitats	Santa Maria Valley (Hunt, pers. observ), about 18 air mi NNW project site Coastal sage scrub along N slope Santa Ynez Mtns and S slope San Rafael Mtns (Hunt, pers. observ.)	Moderate potential in oak savanna and grassland
Two-striped garter snake (*Thamnophis hammondii*)	SSC	Floodplain habitats associated with perennial and intermittent streams, and adjacent grassland and scrub habitats	Birabent Canyon, 1 mi N Figueroa Guard Station, about 6 air mi N project site (1986) 3.2 mi NE jct Hwy 154 x Figueroa Mtn Road, about 5 air mi NNW project site (1995) Happy Canyon Road, 2 mi S Cachuma Saddle, about 6 air mi NE project site (1993)	Moderate potential in seasonal drainages and swales on-site
Western pond turtle (*Actinemys marmorata*)	SSC	Populations associated with permanent water features (rivers, streams, ponds), but individuals range widely along intermittent and seasonal drainages	Known from permanent and intermittent streams at several locations along N slope of Santa Ynez Mtns (e.g., Nojoqui Creek, Quiota Creek, Santa Ynez River) and S slope San Rafael Mtns (e.g., Cachuma Creek, Birabent Cyn Creek) Santa Ynez River between Quiota	No suitable aquatic habitat on-site, but project site is within dispersal distance from man-made ponds E of project site; could disperse along Zanja de Cota floodplain

P998-44
Cont.

Comment Letter P998 (Cont.)

			Creek and Bradbury Dam, about 2 air mi S project site (Hunt, pers. observ.)	
BIRDS				
Golden eagle (*Aquila chrysaetos*)	FP	Resident in region; forages in grassland and oak savanna; nests in mountains or grasslands on steep slopes and in isolated trees	Pair regularly observed foraging and courting in Solomon Hills in 2011, approx. 10-12 miles NW of project site (Hunt, pers. observ.) Regularly observed on Sedgwick Ranch (UC Natural Reserve and vicinity, including project site (Hunt, pers. observ.)	High potential to use grasslands and savanna on-site as foraging habitat; unlikely to nest on project site
Ferruginous hawk (*Buteo regalis*)	SSC	Uncommon fall transient and winter visitor to grasslands and savanna in region	Observed several times over past 10 years in Santa Ynez Valley (Hunt, pers. observ.) Near jct Hwy 101 x Hwy 246 at Buellton, about 7 air mi W project site (1992)	High potential to use grasslands and savanna on-site as foraging habitat during fall and winter
Swainson's hawk (*Buteo swainsoni*)	FT	Winter transient to grassland, oak savanna, and open woodland habitats	Broadly distributed over region	Project area and surrounding open spaces provide suitable winter foraging habitat
Northern harrier (*Circus cyaneus*)	SSC	Grassland, open scrub habitats, and agricultural fields	Observed in Santa Ynez Valley on several occasions (Hunt, pers. observ.)	High potential, especially around agricultural fields in northwestern portion of project site
White-tailed kite (*Elanus leucurus*)	FP	Grassland, oak savanna, and open scrub; forms communal roosts in fall/winter in willow woodlands	Regularly observed foraging in Los Alamos Valley grasslands and Barka Slough area, 1-5 miles from project area (Hunt, pers. observ.)	High potential in grasslands and savanna on-site as foraging habitat; suitable nesting habitat in oaks
Cooper's hawk (*Accipiter cooperi*)	SSC	Resident in oak riparian woodland throughout region	Found throughout region (Hunt, pers. observ.). Nearest CNDDB record is from W of Zaca de Cota Crk, 1 mi S Santa Ynez, about 1.5 air mi W project site (1989)	High potential in oak savanna habitat on-site
Sharp-shinned hawk (*Accipiter striatus*)	WL	Fall and winter transient to open riparian and oak woodlands throughout region	Figueroa Mtn and Sedgwick Ranch (UC Natural Reserve), about 5 air mi N of project site (Lehman, 1994)	Moderate to high potential in oak savanna on-site, particularly in NE and E portions near residential areas

P998-44
Cont.

Comment Letter P998 (Cont.)

Prairie falcon (*Falco mexicanus*)	WL	Resident to region; frequents grassland and savanna habitats while foraging	Observed in Solomon Hills, about 10 air mi NW project area (Hunt, pers. observ., 2011)	Moderate to High potential in grassland and savanna
Long-billed curlew (*Numenius americanus*)	WL	Frequents sand hills, grasslands, oak savanna, and agricultural fields	Small flocks observed in Los Alamos Valley and western Santa Ynez Valley (Hunt, pers. observ.)	Moderate to High potential in grassland, savanna, and agricultural fields
Nesting hummingbirds (Allen's, Costa's, and rufous hummingbirds)	WL (nesting)	Uncommon spring migrant to shrublands and woodlands	Found throughout region	High potential in oak savanna habitats on-site; likely nests on-site in oaks and scrub habitat
Burrowing owl (*Athene cunicularia*)	SSC	Winter transient to grasslands, savanna, and coastal sage scrub habitats	Regularly observed in winter in Santa Ynez Valley (Lehman, 1994)	Moderate to high potential in grassland and oak savanna as wintering species
Loggerhead shrike (*Lanius ludovicianus*)	SSC	Resident in oak savanna and scrub habitats in region	Observed in Santa Ynez Valley at various times (Hunt, pers. observ.)	High potential to forage and nest in oak savanna on-site
Yellow-billed magpie (*Pica nuttalli*)	WL	Resident in oak savannah and open oak woodland in region. Nests and communal roosts are protected	Found throughout region	Observed on-site; communal roosts in oak trees on-site; nests here
Lewis's woodpecker	WL	Irregular fall transient and winter visitor	Irregularly observed in oak savanna in Santa Ynez Valley (Lehman, 1994)	High potential in oak savanna on-site
Nuttall's woodpecker (*Picoides nuttallii*)	WL	Resident in oak woodland and oak savanna	Observed throughout region	High potential to forage and nest in oak savanna
Red-breasted sapsucker (*Sphyrapicus ruber*)	WL	Uncommon transient and winter visitor to region	San Rafael Mtns (Lehman, 1994)	Moderate to high potential to use oak savanna as foraging habitat; low potential as nesting species
California horned lark (*Eremophila alpestris actia*)	WL	Occurs in grassland, open scrub, and savanna habitats; relatively common in region in early spring and summer; found throughout region	Found throughout region	High potential in grassland and oak savanna; may nest here in summer
Oak titmouse (*Baeolophus inornatus*)	WL	Resident in oak savanna and oak woodland; found throughout region	Found throughout region	Observed on-site in oak savanna; nests in oak savanna on-site
Grasshopper sparrow (*Ammodramus savannarum*)	SSC	Uncommon and local summer resident in savanna, grassland, and coastal sage scrub	Found throughout region	Moderate to high potential in grassland and oak savanna on-site
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*)	WL	Rocky, hilly grassland and oak savanna	Found throughout region	Moderate to high potential in rocky grassland on-site
Lark sparrow	WL	Resident in grassland and oak	Commonly observed in Santa	High potential to forage and nest

P998-44
Cont.

Comment Letter P998 (Cont.)

(*Chondestes grammacus*)		savanna throughout region	Ynez Valley (Hunt, pers. observ.)	in grassland and oak savanna on-site
Tricolored blackbird (*Agelaius tricolor*)	SSC	Uncommon in freshwater marshes, lakes, ponds, and irrigated agricultural areas	Sedgwick Ranch (UC Natural Reserve), N confluence Lisque Creek x Figueroa Creek, about 3.5 air mi NNW project site (2005)	Moderate potential to forage around swales and other seasonal water features on-site and around agricultural fields in northwestern portion of project site
Lawrence's goldfinch (*Carduelis lawrencei*)	WL	Locally uncommon in grassland and open woodland habitats throughout region	Irregularly observed in Santa Ynez Valley (Hunt, pers. observ.)	Moderate to high potential to forage in grassland and oak savanna habitats on-site, as well as weedy agricultural areas in N and NW portions of site
MAMMALS				
Pallid bat (*Antrozous pallidus*)	SSC	Grassland and open scrub and woodland; riparian woodland	Roost site shared with *Corynorhinus* on Santa Ynez River, approx. 2 air mi S project site (2005) Roost site with *Corynorhinus* in Zaca Creek, about 7.5 air mi WNW project site (2001) Vandenberg Air Force Base, about 15 air mi SW of project site (Pierson et al., 2002)	High potential to use grassland and oak savanna habitats on-site as foraging habitat; roost sites in vicinity of project site; may use oak trees as temporary roosts
Townsend's big-eared bat (*Corynorhinus townsendii*)	SSC	Grassland and open scrub and woodland; riparian woodland	Roost site shared with *Antrozous* on Santa Ynez River, approx. 2 air mi S project site (2005) Roost site with *Antrozous* in Zaca Creek, about 7.5 air mi WNW project site (2001)	High potential to forage over grasslands and oak savanna habitat on-site; roost sites near project site
Western red bat (*Lasiurus blossevillii*)	SSC	Grassland and woodland habitats	Migratory species; overwinters along coastal regions of SB County; nearest observations are from Vandenberg AFB, about 30 mi SW of project area	Moderate to high potential to forage in grassland and oak savanna habitat on-site in fall and winter when moving from interior to coastal locations; may use oak trees as temporary covers
Hoary bat (*Lasiurus blossevillii*)	SSC	Grassland and woodland habitats	Migratory species; overwinters along coastal regions of SB County; observed at Camulos	Moderate to high potential to forage in grassland and oak savanna habitat on-site in fall and

P998-44
Cont.

Comment Letter P998 (Cont.)

			Landfill and Vandenberg Air Force Base, about 15-18 air mi W of project site in 2002 (Pierson et al., 2002; Heady, 2002)	winter when moving from interior to coastal locations; may use oak trees as temporary roosts
Yuma myotis (*Myotis yumanensis*)	SSC	Woodland and riparian habitats	Observed foraging along riparian corridor of Santa Ynez River (Hunt, pers. observ.)	High potential to forage in grassland and oak savanna habitats on-site, roost in oak trees
Mastiff bat (*Eumops perotis californicus*)	SSC	Forages over woodland and riparian habitats	White Rock Recreational Area, N of Paradise Canyon, about 5 air mi ESE project site (1998) Vandenberg Air Force Base, about 15 air mi SW of project site (Pierson et al., 2007), coastal Santa Barbara County (Constantine, 1998)	High potential to forage in grassland and oak savanna habitats on-site; roosts in nearby mountains
San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)	SSC	Grassland, oak savannah, and open scrub and woodland habitats	Bobcat Springs area W of Buellton and Santa Ynez Valley (Hunt, pers. observ., 2013); broadly distributed in grassland and open scrub habitat throughout region	High potential; project area and surrounding open spaces provide suitable foraging habitat
San Diego desert woodrat (*Neotoma lepida intermedia*)	SSC	Rocky grassland and scrub habitats	Several localities where UPRR tracks cross drainages along S slope Santa Ynez Mtns (Hunt, pers. observ.); observed in Santa Ynez Valley and Santa Ynez River riparian corridor (Hunt, pers. observ.), but subspecific identity of individuals from this region is unknown	Low to moderate potential in rocky oak savanna on-site because extent of habitat is limited
American badger (*Taxidea taxus*)	SSC	Open grassland and oak savanna	Several records of DOR individuals along Hwy 101 N and S of Buellton, about 6.5 air mi W project site (1987, 1989, 2013) and near jct Hwy 101 & Hwy 154, about 5 air mi NW project site (1987)	High potential to den and forage in grassland/savanna on both North and South parcels
Mountain lion (*Felis concolor*)	FPP	Oak and riparian woodland, chaparral, oak savanna	Broadly distributed throughout region	High potential for one or more individuals to include project site in home range, dens probably located in Santa Ynez River and

P998-44
Cont.

Comment Letter P998 (Cont.)

				Santa Ynez or San Rafael mountains
Black bear (*Ursus americanus*)	PP	Oak and riparian woodland, chaparral, oak savanna	Broadly distributed throughout region	High potential for one or more individuals to include project site in home range; dens probably located in Santa Ynez River and Santa Ynez or San Rafael mountains

* ***Regulatory Status Key:***

FE: Listed as Endangered by the U.S. Fish and Wildlife Service or National Marine Fisheries Service, according to the statutes of the Federal Endangered Species Act

FT: Listed as Threatened by the U.S. Fish and Wildlife Service or National Marine Fisheries Service, according to the statutes of the Federal Endangered Species Act

SSC: California Species of Special Concern (California Department of Fish and Wildlife), and protected by the California Environmental Quality Act

FP: Fully Protected (California Department of Fish and Wildlife and/or Federal Eagle Protection Act)

FPF and PF: Fully Protected Furbearer (California Department of Fish and Wildlife)

WL: American Bird Conservancy, National Audubon Society, and/or CDFW Watch List species because of regional population declines

P998-44
Cont.

Comment Letter P998 (Cont.)

Special-Status Wildlife. The project site potentially supports a large number of special-status animals. The species listed in Table 2 are known from the project region and are evaluated herein because the project site contains suitable habitat.

P998-44 Cont.

Habitat Connectivity and Wildlife Movement Corridors. Documenting the existence and relative importance of wildlife movement corridors requires long-term field studies that are beyond the scope of this document (e.g., see discussion and references in Stralberg, 2000 and Gehrt et al., 2010). Any discussion of movement corridors is necessarily species-specific and focuses on dispersal ability, which differs widely for ground-dwelling species versus birds, plants versus animals, animals of different body sizes, etc. In the absence of such field studies, extensive research has shown that biodiversity is generally best conserved by keeping habitats broadly connected, i.e., minimizing habitat fragmentation by anthropogenic disturbance. In other words, the most "porous" movement corridors for wildlife are large landscapes that are broadly connected to other open space.

The project site is large (1,433 acres) and much of the land use therein is compatible with wildlife habitat use and wildlife movement (rangeland). The project site is connected to other open space rangeland to the south and southwest, which more or less retains connectivity to the Santa Ynez River floodplain and riparian corridor and the adjacent north-facing slopes of the Santa Ynez Mountains. Immediately north and west of the project site, land use activities north and west of the project site has converted broad areas of rangeland to row crop agriculture (vineyards, alfalfa/clover production, etc.) and low- to medium density residential/urban uses. Areas east and north of the project site have experienced some fragmentation and conversion of open space, but broad expanses remain on large ranches and preserves, such as the Sedwick Ranch Natural Reserve, which foster connectivity with extensive open space in the San Rafael Mountains. An increasingly uncommon feature of the project site as surrounding areas are developed, is the fact that most of the site is relatively flat, which promotes seasonal wetland formation and has important consequences for the structure and function of wildlife communities.

P998-45

The most significant barrier to dispersal of ground-dwelling wildlife to and from the project site is Highway 154, which is "semi-porous". Wildlife can move through agricultural fields if there are no fences, however, small-acreage "ranchettes" along the northeastern border of the project site as well as large vineyard areas north and southeast of the project site have erected fences that are complete barriers to wildlife movement.

In a general sense, grassland and oak savanna habitats on the undeveloped portions of the project site, which constitutes approximately 80% of the 1,433-acre property, provides cover, foraging, denning, and nesting habitat for a broad diversity of animal species. Of special note are the large number of raptor and carnivore species known from or potentially occurring on-site by virtue of its size and connectivity to important landscape elements nearby (e.g., Santa Ynez River, Santa Ynez Mountains, San Rafael Mountains).

Literature Cited.

Aspen Environmental Services. 1996. Final Environmental Impact Statement, Pacific Pipeline Project. Prep. for Calif. Public Utilities Commission and USDA Forest Service, Angeles National Forest. January.

Barbour. M.G., T. Keeler-Wolf, and A.A. Schoenherr (eds.). 2007. Terrestrial vegetation of California, 3rd ed. University of California Press, Berkeley, CA. 712 pp.

Becker, G.S., I.J. Reining, and D.A. Asbury. 2007. Steelhead/rainbow trout (*Oncorhynchus mykiss*) resources south of the Golden Gate, California. Prep. for the Calif. State Coastal Conservancy and The Resources Legacy Fund Foundation. Center for Ecosystem Management and Restoration, Oakland, CA. 389 pp.

Brenzel, K.N. (ed.). 2007. Sunset Western Garden Book. Sunset Publishing Corp, Menlo Park, CA. 768 pp.

Brown R. and Davis F. 1991. Historical mortality of valley oak (*Quercus lobata*) in the Santa Ynez Valley, Santa Barbara County, 1938-1989. USDA Forest Service Gen. Tech. Rep. PSW-126.

Brylski, P.V., P.W. Collins, E.D. Pierson, W.E. Rainey, and T.E. Kucera. 1998. Mammal species of special concern in California. Draft Final Report to Calif. Dept. Fish and Game, Wildlife Mgmt. Div., Sacramento, CA. 206 pp.

CDFG (California Department of Fish and Game). 1934. Zanja de Cota Creek stream survey. Report by H.C. Jackson, Sacramento, CA.

_____. 2002. List of California terrestrial natural communities recognized by the California Natural Diversity Database. Sacramento, CA. February. 75 pp. Available at http://www.dfg.ca.gov/biogeodata/vegcamp/natural_communities.asp

_____. 2009. Special Animals List for the California Natural Diversity Database (CNDDB). Sacramento, CA. July. 59 pp.

CNDDB (California Natural Diversity Database). 2013. Special-status plants and animals reported from the Dos Pueblos, Figueroa Mountain, Gaviota, Los Olivos, San Marcos Pass, San Rafael Mountains, Santa Ynez, Solvang, Tajiguas, and Zaca Creek 7.5-minute quadrangles. California Department of Fish and Game Nongame Heritage Program, Sacramento, CA. 25 August.

CNPS (California Native Plant Society). 2007. Vegetation Rapid Assessment Protocol, revised. CNPS Vegetation Committee, Sacramento, CA. 21 February. 9 pp.

Constantine, D.G. 1998. Range extensions of ten species of bats in California. Bull. Southern Calif. Acad. Sci., 97(2): 49-75.

County of Santa Barbara. 2008. Santa Barbara County environmental thresholds and guidelines manual. Planning and Development Department, Santa Barbara, CA. October. 172 pp.

_____. 2009. Santa Ynez Valley Community Plan EIR. Prep. by Rincon Consultants, San Luis Obispo, CA.

Crampton, B. 1974. Grasses in California. University of California Press, Berkeley, CA. 178 pp.

Doell, J. and R. Doell. 2000. A guide to some common California lichens. California Lichen Society. 89 pp.

Eriksen, C. and D. Belk. 1999. Fairy shrimps of California's puddles, pools, and playas. Mad River Press, Inc., Eureka, CA. 196 pp.

Fugate, M.L. 1993. *Branchinecta sandiegonensis*, a new species of fairy shrimp (Crustacea: Anostraca) from western North America. Proc. Biological Society of Washington, 106: 296-304.

Gehrt, S.D., Seth P.D. Riley, and B.L. Cypher (eds.). 2010. Urban carnivores: ecology, conflict, and conservation. Johns Hopkins Univ. Press, Baltimore, MD. 285 pp.

Heady, P.A., III. 2004. Results of bat surveys at Casmalia Landfill, Casmalia Hills, Santa Barbara County, CA. Prep. for Hunt & Associates Biological Consulting Services, Santa Barbara, CA. 13 pp.

Hickman, J.C. (ed.). 1993. The Jepson manual: higher plants of California. University of California Press, Berkeley, CA. 1,400 pp.

Holland, R.F. 1986. Preliminary descriptions of the terrestrial natural communities of California. The Resources Agency, Dept. of Fish and Game, Sacramento, CA. 164 pp.

Hunt and Associates Biological Consulting Services. 2011. Biological assessment of proposed Rusack Vineyard expansion, 1819 Ballard Canyon Road, Santa Barbara County, California. Prep. for Suzanne Elledge Planning and Permitting Services, Santa Barbara, CA. 20 pp.

_____. 2012. Biological assessment of proposed lot split, Alisos Canyon Ranch, 9303 Alisos Canyon Road, Santa Barbara County, California. Prep. for Suzanne Elledge Planning and Permitting Services, Santa Barbara, CA. 35 pp.

Jameson, E.W. and H.J. Peeters. 2004. Mammals of California, revised ed. University of California Press, Berkeley, CA. 429 pp.

Jennings, C.W. 1991. Geologic map of California. State of California, The Resources Agency, Dept. of Conservation. Sacramento, CA.

Keeler-Wolf, T. et al. 1998. California vernal pool assessment. Prelim. report to Calif. Dept. Fish and Game. Sacramento, CA.

Lehman, P. 1994. The birds of Santa Barbara County, California. Vertebrate Museum, University of California, Santa Barbara, CA. 335 pp.

Norris, R.M. 2003. The geology and landscape of Santa Barbara County, California and its offshore islands. Santa Barbara Museum of Natural History Monographs No. 3, Santa Barbara, CA. 246 pp.

Olson, Mark. 1992. Vernal pools of northern Santa Barbara County, California. Prep. for the Santa Barbara County Resource Management Dept. 30 September. Contract No. 8100428. 41 pp.

Pierson, E.D., et al. 2002. Final report on the distribution, status, and habitat associations of bat species on Vandenberg Air Force Base, Santa Barbara County, California. Prep. for VAFB, 30 CES/CEVPN, Vandenberg Air Force Base, CA. 135 pp, plus appendices.

Ross, A. 1967. Ecological aspects of the food habits of insectivorous bats. Proc. Western Foundation of Vertebrate Zoology, 1 (4): 202-264.

Santa Barbara Botanic Garden. 1988. Rare and/or endangered plants listed by the California Native Plant Society or State and Federal agencies. Upland habitats of the Santa Barbara South Coast Area between Point Conception and the Ventura River, from the summits of the Santa Ynez Mtns. to the coastline. Unpubl. ms.

Sawyer, J.O., T. Keeler-Wolf, and J.M. Evers. 2008. A manual of California vegetation, 2nd ed. California Native Plant Society and California Department of Fish and Game, Sacramento, CA. 1,300 pp.

Shipman, G.E. 1972. Soil survey of northern Santa Barbara area, California. U.S. Department of Agriculture Soil Conservation Service and Forest Service, Washington, D.C. 116 pp, plus maps.

Smith, C.F. 1998. A flora of the Santa Barbara Region, California, 2nd ed. Santa Barbara Botanic Garden and Capra Press, Santa Barbara, CA. 391 pp.

Stebbins, R.C. 2003. A field guide to western reptiles and amphibians, 3rd ed., Houghton-Mifflin Co., Boston, MA. 533 pp.

Stralberg, D. 2000. Landscape-level urbanization effects on chaparral birds: A Santa Monica Mountains case study, pp. 125-136, *in:* Keeley, J, M. Baer-Keeley, and C.

Fotheringham (eds.). Second Interface Between Ecology and Land Development in California. U.S. Geological Survey, Sacramento, CA.

Tibor, D. (ed.). 2001. Inventory of rare and endangered plants of California, 6th ed. California Native Plant Society, Special Publ. No. 1, Sacramento, CA. 387 pp.

USFWS (U.S. Fish and Wildlife Service), 2005. Recovery plan for vernal pool ecosystems of California and southern Oregon. Portland, Oregon. xxvi + 606 pp.

_____. 2005. Revised guidance on site assessments and field surveys for the California red-legged frog. Ventura Field Office, Ventura, CA. August. 26 pp.

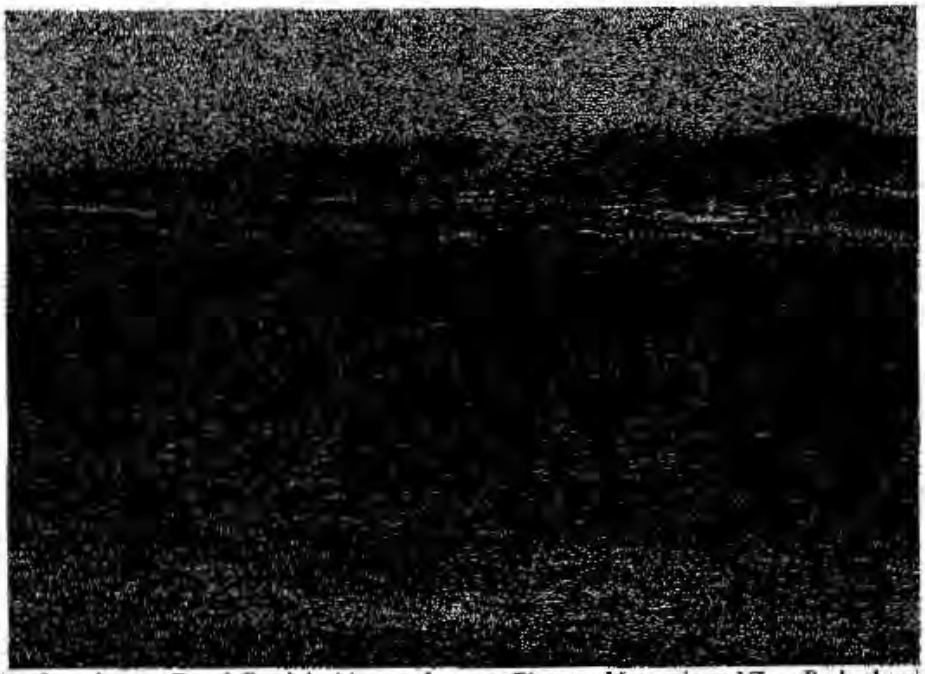
_____. 2006. Critical habitat designation for the vernal pool fairy shrimp (*Branchinecta lynchi*). Federal Register, Vol. 71, No. 28, p. 7180.

Williams, D.F. 1986. Mammalian species of special concern in California. The Resources Agency, Calif. Dept. Fish and Game, Wildl. Mgmt. Div., Sacramento, CA. 112 pp.

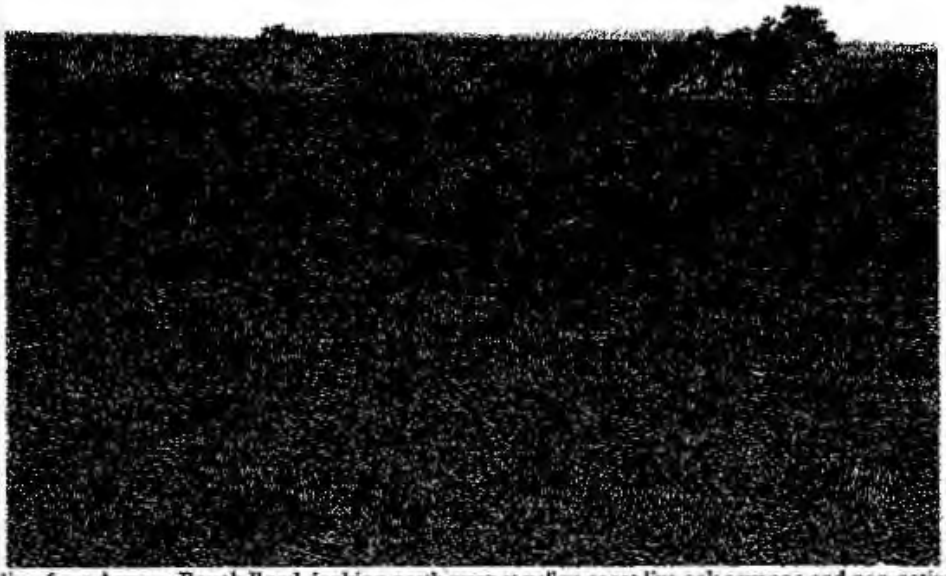
APPENDIX L CAMP 4 SITE PHOTOGRAPHS TAKEN FROM PERIMETER ROADS (August - September 2013)

Fence lines along borders of some ranchland southeast of the project site that presents a barrier to movement of medium- and large mammals.

P998-46



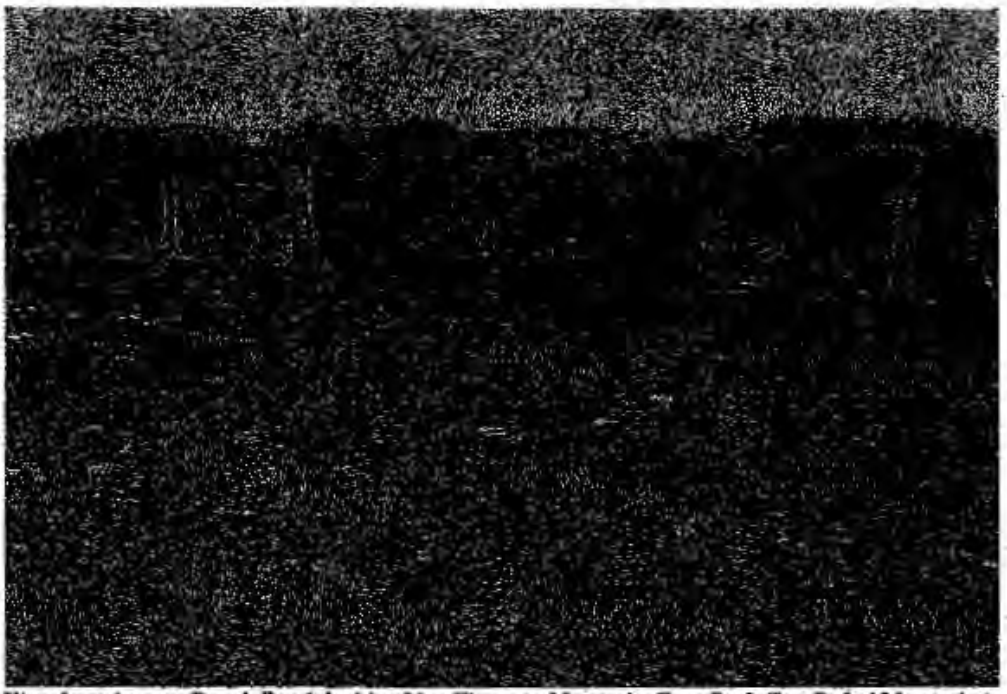
View from Armour Ranch Road, looking northwest at Figueroa Mountain and Zaca Peak, showing habitat fragmentation caused by low-density residential development and agriculture.



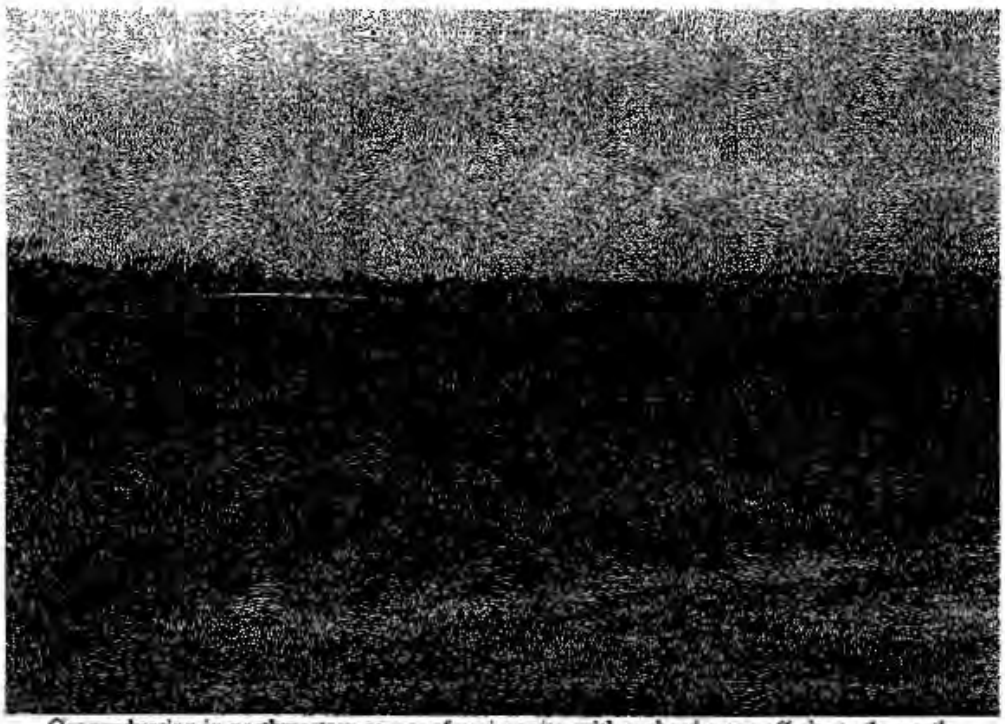
View from Armour Ranch Road, looking north west at valley-coast live oak savanna and non-native annual grassland habitat on project site.

P998-46
Cont.

Non-native annual grassland and oak savanna habitat, looking S at Santa Ynez Mountains from Base Line Road.

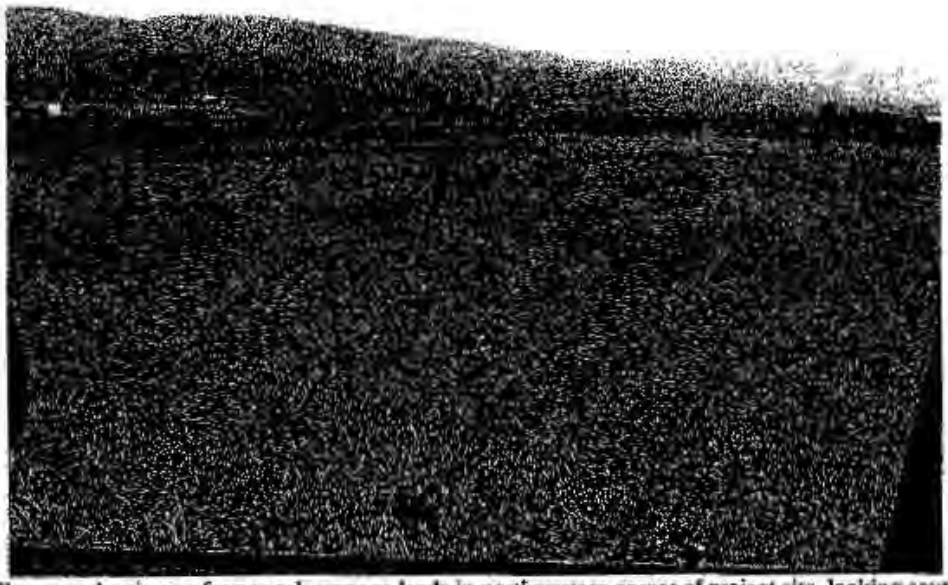


View from Armour Ranch Road, looking N at Figueroa Mountain, Zaca Peak (San Rafael Mountains).



Oat production in northwestern corner of project site, with orchard crops off-site to the north.

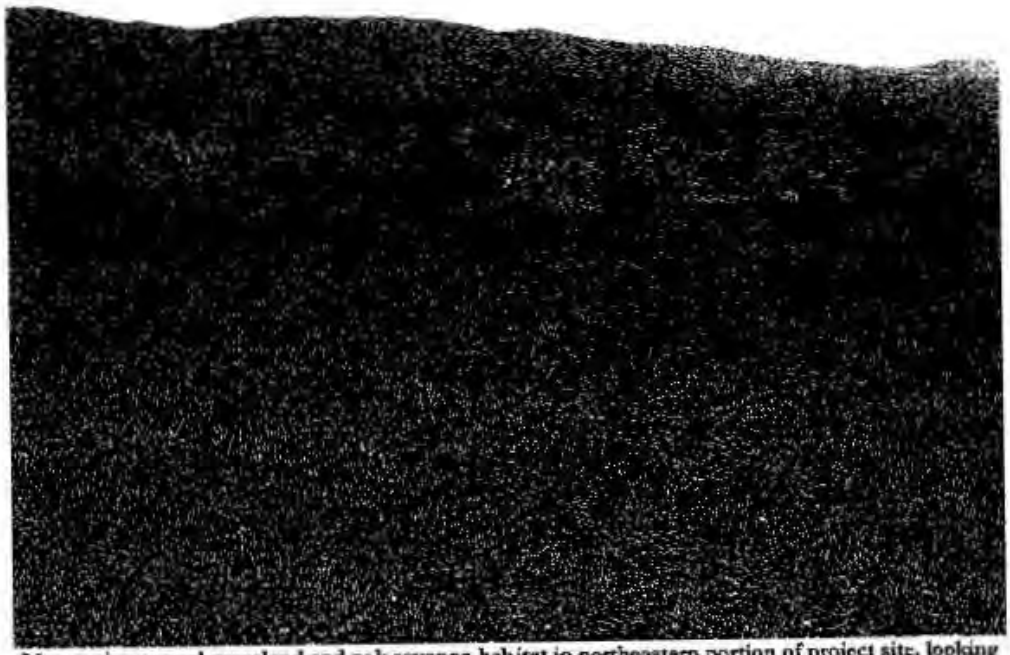
P998-46
Cont.



Clover production on former oak savanna lands in northwestern corner of project site, looking south from Base Line Road.

P998-46
Cont.

Vineyard production on former oak savanna land in northwestern portions of project site, looking south from Base Line Road.



Non-native annual grassland and oak savanna habitat in northeastern portion of project site, looking south from Base Line Road. Note higher density of oaks on north-facing slopes associated with tributary of Zanja de Cota Creek. Santa Ynez Mountains in background.

P998-46
Cont.

Comment Letter P999

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P998.

Comment Letter P1000

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P327.

Comment Letter P1001

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P308.

1460 Highway 154
Santa Ynez, CA 93460
September 30, 2013

Reg Dir ALD
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

Ms. Amy Dutschke
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Re Comments –due October 7, 2013
Environmental Assessment Portion of
Santa Ynez Band of Chumash Indians Camp 4 Fee-To-Trust Application

Dear Ms. Dutschke:

The Environmental Assessment, page 2-8 et al, regarding 'Roadways' does not identify or define existing road easements on the FTT application. I am particularly concerned with the easement on FTT parcel 1 (APN 141-121-51) as I am now an owner of this easement, which has been in our family since 1955.

This easement is used for ingress and egress from Baseline Avenue to the back portion of our ranch. We have no other access to this property for large horse trailers, hay trucks, construction and farm machinery.

It is my understanding that the BIA must require elimination of liens, encumbrances or infirmities prior to taking final approval action of this FTT acquisition. I have not been contacted or given notice regarding the elimination of or the ensuring of the recorded easement. Transfer of this land into FTT without directly contacting us represents a "taking or inverse condemnation" without due process or just compensation.

This fee-to-trust creates irreparable harm.

P1002-01

Sincerely,

Bunnie Shepherd Sexton

Copy via email: chad.broussard@bia.gov

Comment Letters P1003 through P1005

Comment Letters P1003 and P1004

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the content of the letters are nearly identical to that of Comment Letter P273.

Comment Letter P1005

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P328.

Comment Letter P1006

Wim van Dam
wim.van.dam@gmail.com
1240 Quail Ridge Rd
Solvang, CA 93463

To: Amy Dutschke
amy.dutschke@bia.gov
Regional Director
Bureau of Indian Affairs, Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Reg Dir___
Dep RD Trust___
Dep RD IS___
Route DECRAS
Response Required yes
Due Date___
Memo___ Ltr___
Fax___

October 6, 2013

RE: Environmental Assessment, Camp 4 Fee-to-Trust

Dear Ms. Dutschke,

With this letter, we would like to comment on the Camp 4 Fee-to-Trust Environmental Assessment (EA) by the Santa Ynez Band of Chumash Indians (http://www.chumashea.com/wp-content/uploads/2013/08/Environmental-Assessment.pdf). We feel that this EA severely underestimates the role that the current habitat of Camp 4 plays in supporting a wide variety of bird species, many of which winter at this location.

In its Appendix E, the EA lists only 16 species of birds that have been observed during surveys on September 2011, March 2012, and April 2012 (cf. Section 3.4.1). It is hard to take this data seriously as it is straightforward to determine that the Camp 4 location in fact supports close to 100 different bird species. As an appendix to this letter, we have attached a list of 93 species that have been observed the past few years at the south edge of the Camp 4 area, along Armour Ranch Road. (The parcel itself is inaccessible.) This list was compiled using data from the citizen science project eBird, and can be accessed at http://ebird.org/ebird/hotspot/L419284 .

The following few examples concerning specific bird species give further proof of the inadequacy of the EA.

- Northern Harriers, Burrowing Owls, and Grasshopper Sparrows (all California Bird Species of Special Concern) are well known to winter at this site. (For unexplained reasons, the EA did not survey the site during the winter months, which is the period in which the site hosts the most important set of birds.)
- During the winter months, the grasslands of this site hosts flocks of literally hundreds of Horned Larks. Moreover, as part of these flocks, dozens of Chestnut-collared Longspurs (IUCN conservation status: near threatened) and other longspurs winter at this location as well. This is one of the few known wintering grounds for this species in all of California. (The EA completely ignores the role that the site plays in supporting grassland birds.)
- Golden Eagles, which are known to breed nearby, frequently use this site as their hunting grounds.
- Other bird species that are regularly observed at the Camp 4 site and that are on the Audubon WatchList of California Birds are: Nuttall's Woodpecker, Yellow-billed Magpie, Oak Titmouse, Wrentit, California Thrasher, Tricolored Blackbird, Lawrence's Goldfinch.

P1006-01

All of the above facts are missing from the EA.

APPENDIX:
Bird species (93) observed at the south border of Camp 4 (at Armour Ranch Rd, Santa Ynez, CA) as part of the citizen science project eBird(ref.: http://ebird.org/ebird/hotspot/1419284)

California Quail	American Kestrel	European Starling
Double-crested Cormorant	Merlin	American Pipit
Great Blue Heron	Peregrine Falcon	Lapland Longspur
Turkey Vulture	Prairie Falcon	Chestnut-collared Longspur
Osprey	Black Phoebe	McCown's Longspur
White-tailed Kite	Say's Phoebe	Yellow-rumped Warbler
Golden Eagle	Ash-throated Flycatcher	Spotted Towhee
Northern Harrier	Cassin's Kingbird	California Towhee
Sharp-shinned Hawk	Western Kingbird	Chipping Sparrow
Cooper's Hawk	Loggerhead Shrike	Vesper Sparrow
Bald Eagle	Western Scrub-Jay	Lark Sparrow
Red-shouldered Hawk	Yellow-billed Magpie	Savannah Sparrow
Red-tailed Hawk	American Crow	Grasshopper Sparrow
Ferruginous Hawk	Common Raven	Song Sparrow
Killdeer	Horned Lark	Lincoln's Sparrow
Greater Yellowlegs	Northern Rough-winged Swallow	White-crowned Sparrow
Rock Pigeon	Tree Swallow	Golden-crowned Sparrow
Band-tailed Pigeon	Violet-green Swallow	Dark-eyed Junco
Eurasian-Collared-Dove	Barn Swallow	Lazuli Bunting
White-winged Dove	Cliff Swallow	Red-winged Blackbird
Mourning Dove	Oak Titmouse	Tricolored Blackbird
Greater Roadrunner	Bushtit	Western Meadowlark
Burrowing Owl	White-breasted Nuthatch	Brewer's Blackbird
White-throated Swift	Bewick's Wren	Great-tailed Grackle
Anna's Hummingbird	Wrentit	Brown-headed Cowbird
Lewis's Woodpecker	Western Bluebird	Bullock's Oriole
Acorn Woodpecker	Mountain Bluebird	House Finch
Nuttall's Woodpecker	American Robin	Lesser Goldfinch
Downy Woodpecker	California Thrasher	Lawrence's Goldfinch
Hairy Woodpecker	Sage Thrasher	American Goldfinch
Northern Flicker	Northern Mockingbird	House Sparrow

P1006-01 Cont.

Comment Letters P1007 and P1008

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the letters only provide comments on the fee-to-trust application associated with the EA.

10/4/13

W.E. WATCH, INC.

P. O. BOX 830
SOLVANG, CA 93464
WWW.WE-WATCH.ORG

Required

Ltr

October 3, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Environmental Assessment, Santa Ynez Band of Chumash Indians, Camp 4 Fee-to-Trust

Dear Ms. Dutschke.

W.E. Watch, Inc., is a 501(c)(3) which was organized in 1992. We strive to work with others to sustain the beauty and environment of the Santa Ynez Valley. We support careful analysis of proposed land development adhering to a long-term vision for growth that maintains the quality of life for all. P1009-01

We are writing to submit our comments on the above referenced Environmental Assessment (EA).

The stated purposes of an EA are to:

> Provide evidence and analysis sufficient to determine whether an EIS is required.
> Aid a federal agency's compliance with NEPA when no EIS is required
> Facilitate preparation of an EIS when one is necessary

An EIS is required if the proposed federal action has the potential to significantly affect the quality of the human environment, including direct, indirect and cumulative effects. Federal agencies are directed by the Council on Environmental Quality (CEQ) NEPA regulations to the degree of public controversy over these effects in determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). P1009-02

The EA for the Camp 4 Fee-Trust (FTT) application satisfies none of these requirements. Yet the EA states that no significant effects will result of the approval of the FTT application. The EA relies on incomplete and inaccurate data and completely fails to address cumulative impacts. The EA should be withdrawn. An EIS is required.

Comment 1: Tribal Consolidation Plan (TCA) is included in the EA. This TCA is currently being challenged by several entities including the County of Santa Barbara and the undersigned. The Approval is not supported by evidence in the record; no notice was given to all interested parties; approval is contrary to the law governing tribal land acquisitions because the land was never part of the reservation; the Santa Ynez Indians have no remaining ancestral or historical title claims to the land; etc. See attached copy Notice of Appeal. P1009-03

Comment 2: The justification for the FTT based on the need for tribal housing is unsubstantiated and not legitimately analyzed in the EA in terms of the full effect and meaningful use of the existing reservation. The EA concludes based on no apparent evidence that approximately 50 acres of the existing reservation are available but unsuited for development. Fifty acres is more than adequate for 143 homes. This leads us to the more troubling issue. The Tribe has a population of 136 members and roughly 1300 descendants. There is no explanation of why the Tribe with a population of 136 and 1300 descendants is planning 143 home sites. Indeed there is no mention or analysis of the prospective future development to accommodate all of them. The presented alternatives do not even mention the possibility of this development. There must be another plan which would of necessity produce cumulative impacts which have not been analyzed. The EA fails to state the ultimate total development of the land. P1009-04

Comment 3: The Tribe can meet its goals by seeking entitlement through the County of Santa Barbara and does not need to take the land Fee-to-Trust. The EA should have considered the alternatives of development under the existing County Santa Ynez Community Plan and via an amendment to the Santa Ynez Community Plan. Both of these alternatives are feasible, especially when only 17% of the tribal membership lives on the current reservation. There is no showing that tribal members who live off-reservation in the community, and many do, would sell their fee simple interests in their homes and move to the Camp 4 property. Given the small number of tribal members who live on the current reservation, it is likely that a redevelopment alternative is feasible. P1009-05

Comment 4: The analysis of the impact on ground water is completely insufficient. The EA discusses the Tribes uses, but not a plan that includes the off trust lands community. The acquisition of Camp 4 means a loss of local control of the aquifer to the valley. Major decisions regarding usage will be made without consideration of local impacts. Local water companies do not necessarily own the land on which infrastructure is located. Easement supports the use of these properties for infrastructure. Would these easements survive an FTT? Many small water companies and private residences could potentially lose their water source. This impact demands thorough analysis. P1009-06

Comment 5: The Secretary of Interior must ensure and stipulate that easements remain enforce on trust parcels. The Regional Director must require the elimination of all liens, encumbrances or infirmities prior to taking final approval of the FTT. Transferring this land into trust without directly contacting easement owners represents a "taking or inverse condemnation" without due process. P1009-07

Comment 6: FTT must be evaluated as an off reservation acquisition. The Chumash reservation is approximately 1.6 miles from the Camp 4 property. These parcels do not share a boundary with the established reservation land and must be reviewed under the regulations governing an Off Reservation Acquisition. P1009-08

Conclusion: The direct, indirect and cumulative effects of this FTT, and the need for an EIS are undeniable. The integrity of the NEPA process demands the BIA to reject this EA and pursue an EIS prior to any decision on this FTT application. P1009-09

These comments do not include every impact and are not intended to limit any future documents regarding "Camp 4" including future environmental impact studies. P1009-10

Sincerely,

Cathie McHenry
President

Attachment: Notice of Appeal

Cathie McHenry
President
W.E. Watch, Inc.
P.O. Box 830
Solvang, CA 93464

UNITED STATES DEPARTMENT OF INTERIOR

INTERIOR BOARD OF INDIAN APPEALS

W.E. WATCH, Inc. Appellant, v. PACIFIC REGIONAL DIRECTOR, BUREAU OF INDIAN AFFAIRS, Appellee.	Case No. **NOTICE OF APPEAL**

P1009-11

W.E. Watch, Inc., is a 501(c)(3) which was organized in 1992. We strive to work with others to sustain the beauty and environment of the Santa Ynez Valley. We support careful analysis of proposed land development adhering to a long-term vision for growth that maintains the quality of life for all.

W.E. Watch, appeals the June 17, 2013, Approval of the Land Consolidation Acquisition Plan of the Santa Ynez Indians by the Bureau of Indian Affairs for the following reasons:

1. The Approval is not supported by evidence in the record. Instead, the BIA approved the proposal as submitted by the Santa Ynez Band of Indians.

2. The BIA failed to give notice of the Approval to all interested parties, including W.E. Watch as required by the regulations. The time to appeal this decision has not started to run.
3. The purpose of the Approval is to promote fee-to-trust applications by the Santa Ynez Indians. But they were not a recognized tribe in 1934 and do not qualify for these benefits.
4. The Approval is contrary to the law governing tribal land acquisitions because the land was never part of a reservation.
5. The Santa Ynez Indians have no remaining ancestral or historical title claims to the land within the proposed acquisition plan area that was approved by the BIA
6. The Approval will have significant adverse environmental impacts on the Santa Ynez Valley. The BIA should be required to comply with NEPA before issuing the Approval.
7. The BIA failed to insure that there was compliance with State and local laws before approving the Land Consolidation and Acquisition Plan.
8. Only the Secretary of Interior has the authority to approve a tribal acquisition plan. The BIA Regional Director does not have that authority.

Dated: September 21, 2013

CATHIE McHENRY
President
W.E. Watch, Inc.

Comment Letter P1010

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P327.

Comment Letter P1011

Kelly B. Gray
2657 Stow Street / P.O. Box 384
Los Olivos, California 93441
Phone: 805-350-0261 dailylawma@gmail.com

October 2, 2013

To: Amy L. Dutschke, BIA Pacific Regional Director
Chad Broussard , Environmental Protection Specialist,BIA Pacific Regional Office
2800 Cottage Way, Sacramento, CA 95825

Michael S. Black, Director, Bureau of Indian Affairs
MS-4606, 1849 C Street, NW, Washington, DC, 20240

Reg Dir. ___
Dep RD Trust ___
Dep RD IS ___
Route ___
Response Required ___
Due Date ___
Memo ___ Ltr ___
Fax ___

Re: Public Comment re: Chumash Fee-to-Trust Application

As a matter of law, you, the Bureau of Indian Affairs (BIA), are **required** to use the appropriate level of scrutiny to when you exercise your authority pursuant to 25 C.F.R. §151 to evaluate a Fee-to-Trust Application, including the Environmental Assessment submitted in connection with the Application. 25 C.F.R. §151 **expressly prescribes two different levels of scrutiny** to be applied when the BIA evaluates Fee-to-Trust applications. There is one level of scrutiny for land that is contiguous with the existing reservation and a second, higher level of scrutiny for land that is **not** contiguous with the existing reservation.

The Santa Ynez Valley Band of Chumash Indians (The SYV Band) own - in fee - the 1,400 acre property in the Santa Ynez Valley referred to as "Camp 4". Camp 4 is **not** contiguous with the existing Chumash Reservation. P1011-01

On June 17, 2014, the BIA approve a Land Consolidation & Acquisition Plan (TCA) submitted by the SYV Band dated June 2013. The TCA includes "Camp 4". The TCA provides that **any** land that is within its boundaries will be treated as if it were contiguous for purposes of Fee-to-Trust application evaluations. As a result of the TCA, the level of scrutiny that would be applied to the Camp 4 Fee-to-Trust application would be pursuant to 25 CFR § 151.3(a)(1).

On July 12, 2013, the BIA received an Application for Transfer of Title for Fee Lands Into Trust (Fee-to-Trust Application) for "Camp 4" from the SYV Band dated July 2013. P1011-02

On September 11, 2013, the County of Santa Barbara filed an Appeal of the TCA (the Appeal).

In light of the foregoing, **until such time as the ruling on the Appeal has become final**, the BIA cannot know what level of scrutiny to apply to the July 12, 2013 Fee-to-Trust Application. Thus, until there is a final ruling on the Appeal, **the BIA must stay any consideration of the Fee-to-Trust Application.**

Respectfully,

Kelly B. Gray

Kelly B. Gray

cc: Distribution List Attached

Service List

Honorable Barbara Boxer
112 Hart Senate Office Building
Washington, DC 20510

District Director
Honorable Dianne Feinstein
750 "B" Street, Suite 1030
San Diego, CA 92101

Honorable Lois Capps
U.S. House of Representatives
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Santa Barbara, CA 93101

Legal Affairs Secretary
Office of the Governor of California
State Capitol Buliding
Sacramento, CA 95814

Office of the Solicitor
Pacific Southwest Region
2800 Cottage Way, Rm E-2753
Sacramento, CA 95825-1890

Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Joginder Dhillon
Senior Advisor for Tribal Negotiations
Office of the Governor
State Capitol, Suite 1173
Sacramento, CA 95814

Ms. Sara J. Drake
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PO Box 944255
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San Diego, CA 92186-5266

Superintendent
Southern California Agency, BIA
1451 Research Park Drive, Suite 100
Riverside, CA 92507

Salud Carbajal
County Board of Supervisiors
Santa Barbara County
105 East Anapamu Street, 4th Floor
Santa Barbara, CA 93101

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County Board of Supervisiors
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Chandra Waller
County Executive Officer
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

Santa Barbara City Hall
735 Anacapa Street
Santa Barbara, CA 93101

Mr. Brad Vidro
City Manager
City of Solvang
1644 Oak Street
Solvang, CA 93463

Santa Ynez Rancho Estates Mutual Water Company, Inc.
Post Office Box 297 -- Santa Ynez, CA 93460

Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

October 4, 2013

Amy Dutschke, Regional Director
Chad Broussard, Environmental Protection Specialist
Dept. of the Interior, Bureau of Indian Affairs
Pacific Regional Office, Suite 2820
2800 Cottage Way
Sacramento, CA 95825

RE: Comment on Environmental Assessment (EA) of Proposed Trust Acquisition of Five Parcels known as the Camp 4 Property

Dear Ms. Dutschke and Mr. Broussard,

Thank you for extending the comment period on this document in response to numerous requests, including ours. Thank you in advance for giving serious consideration to the criticisms of the analysis which have been solicited and are herein provided.

P1012-01

THESE COMMENTS ARE FILED UNDER PROTEST:

First, the comments filed on this EA by the Santa Ynez Rancho Estates Mutual Water Company, Inc. are filed under protest for two reasons:

> This entire process to consider annexation of Camp 4 is based upon a materially false premise: that a TCA has been lawfully approved which includes the property. Numerous legal appeals have been filed (including ours) challenging this premise on multiple material counts. *Until all legal issues are fully resolved regarding the TCA there should be no action taken on this fee-to-trust application, including no action on the associated EA.*

P1012-02

> The magnitude and foreseeable impacts from this application to annex 1,400 acres -- over 2 square miles -- of land in the Santa Ynez Valley go well beyond that which can be analyzed in an EA. Under existing development practices in Santa Barbara County, this is enough land area to develop a town of between 5,000 and 10,000 population. (Solvang is same size, population is 5,000; Carpinteria is only 200 acres larger, population is 13,000.) In addition, this is a highly controversial project that has been receiving national news coverage since 2005, and it has been the subject of oversight hearings by the House Resources Sub-committee on American Indian and Alaskan Native Affairs. *Therefore, an EIS is unquestionably required in this case.*

P1012-03

There are material faults with proceeding with this process and it has the highly adverse effect on the public interest by unnecessarily consuming valuable and scarce public time, energy, and money.

COMMENTS RELATED TO WATER ISSUES :

1) The EA's forecast demand for water usage by the 143 5-acre homes in Alternative A

We start with the Conclusion: *the Alternative A forecast of 379 acre feet per year (or 2.6 ac. ft. per parcel) is low by over 4X.*

The Data upon which this conclusion is based:

> Our service area is contiguous with Camp 4, and identical in nature

> The Chumash proposal is for 143 tribal homes, 3,000-5,000 square feet each, on 5 acre parcels. Since this is represented as "desperately needed housing", it must be assumed that they are full-time residences, not second homes.

> In contrast, we serve 91 properties, most commonly 2,000-3,000 square feet homes, also on 5 acre parcels. Many of these are second homes which are occupied only occasionally.

> The EA assumption is 3.5 people per home; our actual population in full-time residence is about 1.5 people per home. Second home effects reduce the full time equivalent population further.

P1012-04

> Analysis of actual water usage by our users most comparable to the Chumash proposal (similar size, quality, and occupancy) is an annual water usage of 11.6 acre feet per year each --- in contrast with the EA assumption of only 2.6 acre feet per year each.

> Conclusion: actual water usage by Alternative A will be 4.4 times as much as forecast and analyzed by the EA.

2) The EA's forecast demand for water usage by the 143 homes in Alternative B

> The water usage forecast for the 143 homes in Alternative B is similarly understated and unrealistic. An accurate assessment of the environmental impacts cannot be based on numbers which have been selected to favorably skew the analysis in favor of the applicant and against the public.

3) Only a small fraction of reasonably foreseeable development is analyzed

The EA analyzes the water demand for only a tiny percentage of the clearly foreseeable development of the Camp 4 property. In addition to what was analyzed in this document, the applicant has already publicly displayed its desire on this property for a casino, a multi-hundred room hotel, two golf courses, an equestrian center and 175 related condominiums. All that proposed development used significantly less than half of the land area of Camp 4.

P1012-05

4) Overall water usage issues

Each individual well on Camp Four can pump between 1,000 and 2,000 gallons per minute (gpm) this is equivalent 4.4 to 9 acre/ft/day or 1600 to 3000 acre/ft/year. In contrast, recharge from precipitation in this area is roughly 5 to 10% of precipitation, close to zero in years like the past two.

For 1400 acres this yields recharge of roughly 120 acre'ft/year, assuming 1 inch of recharge. Pumping above this level will result in groundwater being taken from surrounding properties, lowering their water levels and possibly resulting in wells having to be drilled deeper and/or the development of new wells.

Even the minimal development which is analyzed by this EA exceeds this recharge significantly, and the foreseeable potential development is many times what was analyzed.

P1012-06

OTHER AREAS OF CONCERN

1) Potential for casino development not analyzed

This EA must consider this application as including "gaming". First, the tribe has already publicly demonstrated with their joint proposal with Fess Parker in 2005 that they wish to have their second casino on this property. In addition, the robust history of tribes -- with the active support of the BIA -- changing actual land use from that which is proposed during the fee-to-trust process makes it imperative that this be analyzed a a gaming application. The implications of this are dramatic, and cover virtually all areas of NEPA concerns.

P1012-07

2) Impacts of numerous proposed developments are not analyzed

The EA states: "The tribal facilities would include development of a banquet/exhibition hall designed with an agriculture/equestrian theme, associated administrative spaces, a tribal office complex, and a tribal community space including ceremony room and gymnasium....Approximately 400 parking spaces would be provided for the facilities."

However, nowhere in the EA are the impacts of the use of this facility analyzed. The proposed "community event facilities" are stated to encompass nearly 80,000 square feet, include 400 parking spaces (enough for 1,000 or more simultaneous visitors), and is proposed (but not limited to) being used 100 times per year.

Santa Ynez Valley residents already are troubled by and pursuing ordinances to regulate and restrict the number of special events that may be hosted at wineries and other privately owned facilities due to the traffic, light and sound pollution, and other negative impacts caused by these events.

The impacts from these proposed facilities must be realistically forecast and analyzed.

P1012-08

3) Traffic impacts are not adequately forecast or analyzed

The EA in no way adequately forecasts or analyzes the significant impacts on County roads and circulation that would obviously result from the reasonably foreseeable development of this currently undeveloped 1400 acres -- 2.2 square miles -- of Santa Ynez Valley land. P1012-09

4) Impacts on Public Safety services not adequately forecast or analyzed

The EA in no way adequately forecasts or analyzes the significant new demands for County law enforcement and fire services that would result from the proposed development of this currently undeveloped 1400 acres – 2.2 square miles -- of Santa Ynez Valley land. P1012-10

5) Impacts to Biological Resources are not adequately forecast or analyzed

While the EA provides general information and maps regarding biological resources it fails to adequately analyze the impacts of reasonably foreseeable development on the Camp 4 property and completely fails to analyze how the project impacts the surrounding regional area. NEPA requires such an analysis. P1012-11

6) Cumulative Impacts are completely ignored

The cumulative impacts analysis must include all reasonably foreseeable projects, on and off the subject property. This analysis is missing in the EA, and it affects numerous areas of required impact analysis. P1012-12

CONCLUSION

Santa Ynez Rancho Estates Mutual Water Company, Inc. respectfully requests that the BIA immediately stay the processing of this EA and the associated fee-to-trust application for Camp 4 until all legal issues involving the TCA upon which they are predicated have been resolved. P1012-13

In addition, we respectfully request that after such issues have been resolved the BIA prepare a full EIS for recirculation and review of this proposed fee to trust acquisition, as required by law, which includes addressing of all public comments received in response to this defective EA as well as all comments to be received in response to the EIS. P1012-14

Sincerely,

RB Field

Robert B. Field, President
on behalf of the Board Of Directors
Santa Ynez Rancho Estates Mutual Water Company, Inc

Comment Letter P1013

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P289.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

EA COMMENTS, 1,400 acre fee to trust, SY BAND

1 message

Kathy Cleary <kcleary@cfginc.us> Thu, Oct 3, 2013 at 5:02 PM
To: "Chad.broussard@bia.gov" <Chad.broussard@bia.gov>

RE: Santa Ynez Band of Mission Chumash Indians fee-to-trust, 1,400 acres

Dear Mr. Broussard,

I was advised to send P.O.L.O.'s comment on the EA to Amy Dutschke. It was mailed today. I wanted to send the letter to you.. this does not include the attachments. Ms. Dutschke will have the attachments with the entire document. If you need me to email the attachments, please let me know. Here is our letter.

Kathy Cleary
P.O.L.O. Board President

POLO EA COMMENTS KEN.docx
122K

October 3, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs (BIA)
Pacific Regional Office
2800 Cottage Way
Sacramento, ca. 95825

SUBJECT: Comment, Environmental Assessment, Santa Ynez Band of Chumash Mission Indians, "Camp 4", approximately 1,400 acres, Santa Ynez, Ca. fee-to-trust.

Dear Ms. Dutschke,

Preservation of Los Olivos, P.O.L.O., is a grass roots citizen group in the Santa Ynez Valley representing approximately 1,000 people. P.O.L.O. has appeared as an interested party in BIA and IBIA cases, and has commented on many issues regarding BIA decision-making that is aggressively promoting expansion of Tribal land into federal trust. The BIA's expansion of Tribal land into federal trust is of critical importance to our community, and communities throughout the United States. Tribal governments claim that when land is in federal trust it is outside local and state jurisdiction and taxation. Tribal government leadership is not accountable to the non-Indian community - the non-Indian community does not elect them - yet their decision-making impacts the community. P1014-01

Impacts of placing land into federal trust include public health, safety and welfare, property values, and also taxation. Tribal businesses on land in trust are not subject to taxation. Consequently, expansion impacts such as crime, water usage, road repair and school funding are paid for by the taxpayer. In addition, even Tribes with casinos generating hundreds of millions of dollars in revenue receive federal subsidies from taxpayer dollars. P1014-02

The BIA has consistently ignored these impacts on communities.

Please refer to www.polosyv.org for our Mission Statement and for documents demonstrating P.O.L.O.'s longstanding involvement with this issue. In particular, refer to P.O.L.O.'s Written Statement for the Record submitted to the United States House of Representatives House Resources Committee Subcommittee on Indian and Alaska Native Affairs, July 22, 2011.
(http://www.polosyv.org/images2/pages/index/POLOCongressmanYoung4.pdf) P1014-03

P.O.L.O. is now taking this public comment opportunity to *request an Environmental Impact Statement, and referral to an outside agency for its review*.

P.O.L.O. will document that the Environmental Assessment, Santa Ynez Band of Chumash Mission Indians, "Camp 4", approximately 1,400 acres, Santa Ynez, Ca. is inaccurate, incomplete and fails to address many issues that will negatively impact the public health, safety and welfare, and private property values. These comments do not include every impact, and they are not intended to limit comments on any future documents regarding "Camp 4", including future Environmental Impact Studies.

P1014-04

The purpose of the Environmental Assessment (EA)

(http://www.epa.gov/Compliance/basics/nepa.html#requirement)

The Council on Environmental Quality (CEQ) coordinates Federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. CEQ was established within the Executive Office of the President by Congress as part of the National Environmental Policy Act of 1969 (NEPA) and additional responsibilities were provided by the Environmental Quality Improvement Act of 1970.

The NEPA process consists of an evaluation of the environmental effects of a federal undertaking including its alternatives. There are three levels of analysis: categorical exclusion determination; preparation of an environmental assessment/finding of no significant impact (EA/FONSI); and preparation of an environmental impact statement (EIS).

An EA is described in Section 1508.9 of the CEQ NEPA regulations. Generally, an EA includes brief discussions of the following:

P1014-05

- The need for the proposal
- Alternatives (when there is an unresolved conflict concerning alternative uses of available resources)
- The environmental impacts of the proposed action and alternatives

A listing of agencies and persons consulted.

Federal Agency Role

The role of a federal agency in the NEPA process depends on the agency's expertise and relationship to the proposed undertaking. The agency carrying out the federal action is responsible for complying with the requirements of NEPA.

- **Lead Agency:** In some cases, there may be more than one federal agency involved in an undertaking. In this situation, a lead agency is designated to supervise

preparation of the environmental analysis. Federal agencies, together with state, tribal or local agencies, may act as joint lead agencies.

- **Cooperating Agency:** A federal, state, tribal or local agency having special expertise with respect to an environmental issue or jurisdiction by law may be a cooperating agency in the NEPA process. A cooperating agency has the responsibility to assist the lead agency by participating in the NEPA process at the earliest possible time; by participating in the scoping process; in developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise; and in making available staff support at the lead agency's request to enhance the lead agency's interdisciplinary capabilities.
- **Council of Environmental Quality (CEQ):** Under Section 1504 of CEQ's NEPA regulations, federal agencies may refer to CEQ on interagency disagreements concerning proposed federal actions that might cause unsatisfactory environmental effects. CEQ's role, when it accepts a referral, is generally to develop findings and recommendations, consistent with the policy goals of Section 101 of NEPA.

P1014-05 Cont.

P.O.L.O. requests that the BIA relinquish its role as lead agency regarding this EA to an alternate agency, including but not limited to the Council of Environmental Quality, that will provide objective decision-making on this Environmental Assessment to ensure that the rights of all people are represented, for the following reasons:

1. The Bureau of Indian Affairs is inherently biased towards decision-making favoring people of Indian descent.

"The Bureau of Indian Affairs' (BIA) mission is to "... enhance the quality of life, to promote economic opportunity, and to carry out the responsibility to protect and improve the trust assets of American Indians, Indian tribes, and Alaska Natives."

P1014-06

Pepperdine Law Review, 12-15-2012, "Extreme Rubber Stamping: The Fee-to-Trust Process of the Indian Reorganization Act of 1934"

"Most significantly, *100% of the proposed fee-to-trust acquisitions submitted to the Pacific Region BIA from 2001 through 2011 were granted.*[183] Additionally, across all 111 decisions, the Pacific Region *BIA did not conclude that a single factor weighed against acceptance of the land into trust.* This resulted in a total of 10,538.03 acres being accepted into trust for individual Indians and tribes in California over that period." (page 278)(Appendix A or go to: http://digitalcommons.pepperdine.edu/cgi/viewcontent.cgi?article=1727&context=plr)

NEPA requires that the lead agency take a "hard look" at the environmental

P1014-07

consequences before proceeding. The BIA may be unwilling or unable to require full compliance with NEPA because to do so would be incompatible with its mission to protect and fully support tribal economic development.

P1014-07 Cont.

This Environmental Assessment is inaccurate and incomplete. An Environmental Impact Statement is warranted for the following reasons:

1. Once in federal trust, the use of the land can be changed. 25 CFR Part 151 does not authorize the Department of the Interior to impose restrictions on a Tribe's future use of land that has been taken into trust. In a 2008 letter from then Assistant Secretary of Indian Affairs, Carl J Artman: "In addition, the Department has been reluctant in the past to take any action to eliminate the flexibility that Indian tribes enjoy to change the use of lands both because it is an aspect of tribal sovereignty, and because it is a needed tool to adapt to changed economic conditions." (Appendix B or go to: http://www.polosyv.org/hotTopics/pdf/DOI_to_Congressman_Hunter-no_restrictions.pdf)

P1014-08

The Secretary would have to approve any restrictions or encumbrances on the land and there are no such Secretarial approved restrictions. (Appendix C or go to: http://www.polosyv.org/images2/pages/index/2005_oic_opinion.pdf)

NEPA requires that all foreseeable uses be considered. Since the Department is taking the position that development on land in trust is outside State jurisdiction, then an EA or EIS must consider all possible development. Development on the 1,400 acres, an area the size of the adjacent city of Solvang, could include a second Casino (as allowed by their Tribal State Gaming Compact), a power plant, massive commercial development, or thousands of homes. This EA fails to address all foreseeable uses.

2. The EA fails to address the impact of the "TCA"; its parameters and conclusions are based on this land falling in a Tribal Consolidation and Acquisition Area. Paragraph 1 of the Introduction of the EA states the following: "The land proposed for trust acquisition, which is known as the Camp 4 site and is currently owned in fee by the Tribe, consists of approximately 1,411.1 acres plus rights of way in Santa Barbara County, California and is located within the Tribal Consolidation Area (project site)."

At least nine Appeals of this Tribal Consolidation Area are now on record with the BIA, including an appeal by Santa Barbara County, objecting to the Pacific Region BIA approval of this area as a Tribal Consolidation and Acquisition Area for the Santa Ynez Band. The boundary of this TCA was approved with no legal or outside review and determination of its accuracy. It is based on an 1897 Roman Catholic Church lawsuit. However, in in 2002 the attorney for the Santa Ynez Band stated there were no lineal descendants of the individual Indians involved in that lawsuit. (Appendix D or go to: http://www.polosyv.org/images2/pages/index/2002_letter.pdf)

P1014-09

This decision by the BIA was also completed with no notification to property owners within the TCA, nor notification to the County or the State. (See Appendix E). It has caused immediate impact on property values, with documented escrow failures (See Appendix E or go to: http://www.polosyv.org/hotTopics/pdf/realtor-robert-etling-speaks.pdf...) and the necessity of disclosure by realtors (See Appendix F)

The nine pending IBIA Appeals are challenging the TCA, which is being used as a basis of the EA for the Camp 4 fee to trust application.

Congresswomen Lois Capps and Diane Feinstein have sent questions about the TCA to the BIA. (See Appendix G.) Those questions should be fully answered as a part of the EA process.

In addition, the EA did not include any discussion of the impact of the TCA that facilitates fee-to-trust land transfers on all land within the TCA. If the TCA is approved, this 11,500 acres could be considered contiguous to a reservation. The standards are lower for contiguous or "on-reservation" fee-to-trust decision-making than the standards for "off reservation" fee to trust applications. Without the TCA, Camp 4 is clearly not contiguous and would be an "off reservation" acquisition subject to the stricter standards and other restrictions.

P1014-09 Cont.

3. The EA and TCA fail to address the impact on hundreds of property owners that are within the TCA. (See Appendix H) Every one of the affected property owners are obviously "interested parties" with respect to the TCA and EA. As such they are entitled to receive direct notice of the TCA and EA from the BIA by personal delivery or mail. They have a due process right to receive direct notice and to have an opportunity to provide meaningful comment on the TCA before the EA is completed.

4. The EA fails to address the claimed 1,300 lineal descendants. The EA references 1,300 lineal descendants, page 1-6, "Purpose and Need": "The Tribe has a population of 136 tribal members and approximately 1300 lineal descendants which it must provide for." Although the application states the need to provide housing for 1,436 people, it only addresses 143 home sites. This EA fails to address this stated Purpose and Need.

P1014-10

5. The EA fails to address "commercial enterprises", page 1-7, "Purpose and Need": "Secondarily, the trust acquisition of the proposed trust land would also allow full tribal governance over its existing agricultural operations on the property; thereby allowing the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises. Under the Proposed Action, the tribal government would be able to fully exercise its sovereignty over its own future growth."

P1014-11

As explained above, according to the BIA, once land is in federal trust the use can be changed without limitation. The Santa Ynez Band is clearly stating their intent to expand development on this land to provide for these 1,436 people, and future

generations. This EA fails to address that stated Purpose and Need.

P1014-11 Cont.

6. The EA fails to address the impact on water. Potential unrestricted development could impact the water supply to residents in the Santa Ynez Valley and Santa Barbara. In addition, tribes are making claims to water rights. A Hastings College Law Review Article, Summer, 2013 states: "...This note will lay out arguments the Santa Ynez Chumash Band of Indians could use to secure a right to groundwater..." (Appendix I or go to: http://www.polosyv.org/hotTopics/pdf/Research-LR-Santa-Ynez-Ground-Water-19%20HastingsWNWJEnLPoly_277.pdf)

P1014-12

7. The EA fails to address the TCA and fee-to-trust transfer of land outside the Santa Ynez Valley Community Plan (SYVCP). The SYVCP was adopted in 2009 after 10 years. It provides guidance for thoughtful decision-making. The TCA removes land from the SYVCP.
(http://longrange.sbcountyplanning.org/planareas/santaynez/documents/Board%20of%20Supervisors%20Adoption/Electronic%20Docket/Master%20Final%2010-15-09.pdf)

Santa Barbara attorney Barry Cappello informed Congresswoman Capps in 2011 about the removal of the 1,400 acres from the Santa Ynez Valley Community Plan outside of the established process.(See Appendix J or go to:
http://www.polosyv.org/hotTopics/pdf/11-18-11-CN_Lois_Capps.pdf)

The Santa Ynez Band is required to comply with applicable State and local law, including the Santa Ynez Valley Community Plan, regardless of whether the lands are taken into trust. See *Hawaii v. Office of Hawaiian Affairs*, 129 S.Ct. 1436 (2009).

P1014-13

8. The EA fails to address increased crime that occurs on land in trust- Indian Reservations. This is well documented: "The Country's 310 Indian reservations have violent crime rates that are more than two and a half times higher than the national average, according to data compiled by the Justice Department. American Indian women are 10 times more likely to be murdered than other Americans. They are raped or sexually assaulted at a rate four times the national average." (Appendix K or go to:
http://www.nytimes.com/2012/02/21/us/on-indian-reservations-higher-crime-and-fewer-prosecutions.html?pagewanted=1&_r=0)

P1014-14

9. The EA fails to address the impact of the Santa Ynez Band's claim of land as aboriginal territory on the State of California. In a 2005 letter from the Office of Governor Schwarzenegger, the Governor wrote: "Further, while the Tribe seeks to justify the acquisition as a re-acquisition of the "Chumash cultural group's" aboriginal territory, it has not demonstrated either a political entitlement to that territory...Allowing up to 108 federally recognized tribes in California to place into trust land for which they have an aboriginal claim could involve more than 75 million acres... Such a result would constitute federal interference with the powers reserved to the State in a manner patently at odds with the intent of the Tenth Amendment." (See Appendix L or go to:
http://www.polosyv.org/hotTopics/pdf/LetterFromGov.pdf)

P1014-15

10. The EA fails to address the impact of the removal of 1,400 acres for the fee-to-trust, and 11,500 acres for the TCA, from the Williamson Act. P1014-16

11. The EA fails to address the impact of the removal of 1,400 acres for the fee-to-trust, and 11,500 acres for the TCA, on agriculture. P1014-17

12. The EA fails to address the impact of development on the Scenic Highway. P1014-18

13. The EA was completed by AES. There are allegations that AES has violated NEPA with its work with other tribes: "Martin found that the Cowlitz tribe, its attorneys, partners and lobbyists had "at least 71 formal telephonic or in-person meetings" with AES while the lead agency, the Bureau of Indian Affairs (BIA), had virtually no active role in the preparation of the environmental study. This is illegal under NEPA." Because of these allegations, a different, more independent consultant should be hired to prepare the EIS to avoid future issues. (See Appendix M or go to: http://archive.constantcontact.com/fs096/1102324248697/archive/1109368311474.html) P1014-19

Conclusion: This Environmental Assessment is inaccurate, incomplete, and the TCA is being legally challenged in at least nine separate appeals, including an Appeal by the County of Santa Barbara.

P.O.L.O. *requests an Environmental Impact Statement and referral to an outside agency for its review.* P1014-20

These comments do not include every impact, and they are not intended to limit comments on any future documents regarding "Camp 4", including future Environmental Impact Studies.

Sincerely,

The Board of Preservation of Los Olivos, P.O.L.O.

P.O. Box 722

Los Olivos, Ca. 93441

www.polosyv.org

Comment Letters P1015 and P1016

Comment Letter P1015

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the letter presents appendices to Comment Letter P1014, which do not address the Proposed Action, project alternatives, or analysis presented in the EA.

Comment Letter P1016

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letters P1014 and P1015.

BISON CONNECT

Broussard, Chad <chad.broussard@bia.gov>

FW: Santa Ynez Band of Chumash Indians

1 message

Amy Dutschke <amy.dutschke@bia.gov> Thu, Oct 24, 2013 at 8:52 AM
To: Arvada Wolfin <arvada.wolfin@bia.gov>, Chad Broussard <chad.broussard@bia.gov>

FYI

From: John G. Traller [mailto:jayteehere@verizon.net]
Sent: Wednesday, October 23, 2013 7:58 PM
To: Amy.dutschke@bia.gov
Subject: Santa Ynez Band of Chumash Indians
Importance: High

Hello Ms. Dutschke

This email concerns the pending application of the above tribe to place additional lands within their reservation.

I am a former resident of Santa Ynez; still reside in Santa Barbara County within 15 minutes of the Santa Ynez Valley; and have absolutely no ties, directly or indirectly, with the Tribe. I have observed with dismay the negative reactions displayed by some residents to the Tribe's application. Such reactions appear at times to approach near-hysteric proportions. It may be those residents hope to affect the outcome by the sheer shrillness of their protests.

The sole reason for emailing you is to assure you that such attitudes are by no means unanimous. In my opinion, and in the opinion of others with whom I have spoken, the application should be considered solely on its merits, and independently of the small-minded, self-serving, and at times irrelevant comments which have been generated by certain elements of the community. P1017-01

The Tribe has repeatedly shown, by past actions over the long term, that they are extremely good citizens who are mindful of the overall welfare of the Santa Ynez Valley community.

Your services in your present capacity are much appreciated. Thank you.

John G. Traller, CPA

Comment Letter P1018

This comment letter is included in **Table 2-1** as it is part of the administrative record but a copy was not provided herein as the content of the letter is nearly identical to that of Comment Letter P327.

Allen Matkins

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Reg Dir
Dep RD Trust
Dep RD IS
Route Trust Decisions
Response Required Yes
Due Date
Memo Ltr
Fax

October 3, 2013

Amy Dutschke, Regional Director
Bureau of Indian Affairs (BIA)
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

Re: Comments on the Environmental Assessment for the Santa Ynez Band of Chumash Indians Camp 4 Fee-To-Trust Proposed Action

Dear Ms. Dutschke:

Save The Valley Plan ("STVP") is an unincorporated association which includes landowners in the Santa Ynez Valley who will be significantly impacted by the proposed Fee-To-Trust ("FTT") proposal. The implications of having 1,400 acres transferred from local and state jurisdiction and taxation to tribal control are well beyond significant. If the FTT proposal is approved, then land use control over 1,400 acres in the middle of the Santa Ynez Valley will be completely outside the control of the local and state government. This has the likelihood, let alone the potential, of causing a wide variety of significant impacts on the current and future residents of the Santa Ynez Valley, including the members of STVP. Among others, the propsed project will have significant negative impacts on public health, safety and welfare, land use planning, aesthetics, water supply, biological resources, noise, population growth and housing, and transportation and traffic. P1019-01 P1019-02

For all the reasons noted below, STVP requests that the Environmental Assessment ("EA") be withdrawn and prepared in a manner consistent with the comments below so that it meets the minimal requirements under the National Environmental Policy Act ("NEPA") and re-circulated for public comment or that the BIA prepare a detailed Environmental Impact Statement ("EIS") which adequately and thoroughly addresses all potential impacts of this proposed action. P1019-03

DETAILED COMMENTS

NEPA establishes a process by which federal agencies must study and understand the environmental effects of any of their proposed actions. One of the specific purposes of NEPA is to promote efforts that will prevent or eliminate damage to the environment and protect human health and welfare. Public involvement is a critical part of the NEPA process. In order for NEPA's goal of full environmental disclosure and problem-solving to be achieved, there must be full public disclosure and open decision-making on the part of federal agencies prior to taking action on a P1019-04

proposed project or approval. Thus, in order for NEPA to fulfill its intended purpose, federal agencies must make diligent efforts to involve the public and to consider the concerns of the public.

Once the federal agency decides that a proposed action falls within the scope of NEPA, it must determine whether the proposed action may "significantly affect the quality of the human environment." In order to make this determination, the federal agency first prepares an EA. The purpose of the EA is to provide the federal agency with an initial analysis of the environmental impacts that could possibly arise as a result of the proposed action. Thus, it is critical that the EA contain enough information and address all of the potential impacts in order for it to adequately inform the federal agency as well as the public on whether or not the proposed action will or will not have a significant impact.

Federal agencies do have some discretion in reaching this determination but it is certainly not unlimited. In fact, pursuant to numerous Federal Appellate and U.S. Supreme Court decisions, the agency must provide "convincing reasons" why an EIS is not necessary. In one of those decisions, Maryland-National Capital Park and Planning Commission v. United States Postal Service, 487 F.2d 1029 (D.C. Cir. 1973), the Court stated the following:

P1019-04 Cont.

> *"There are a number of criteria that can be used by a court to make such a determination. First, did the agency take a "hard look" at the problem, as opposed to bald conclusions, unaided by preliminary investigation? Second, did the agency identify the relevant areas of environmental concern? Third, as to problems studied and identified, did the agency make a convincing case that the impact is insignificant?"*

Essentially, reviewing courts need to take a hard look at an agency' decision not to prepare an EIS to ensure that the agency took a hard look pursuant to this hard-look doctrine. Aassumptions must be spelled out, inconsistencies explained, methodologies disclosed, contradictory evidence rebutted, record references solidly grounded, guesswork eliminated and conclusions supported in a manner capable of judicial understanding.

With these standards in mind, please note all the comments below which failed to meet even the minimal standards just described.

1. The EA states that the tribe's Consolidation and Acquisition Plan (CAP") was approved June 17, 2013, by the Regional Director. The purpose for this comment is to then conclude that, according to the land acquisition policy defined in 25 C.F.R. 151.3(a)(1), "land may be acquired in trust status for a tribe when a property is located within a Tribal Consolidation Area ("TCA") and given the same level of scrutiny of land acquisition on or adjacent to a tribe's reservation." The BIA then concludes that "the trust application for the proposed trust's proposal constitutes a request for land acquisition within an approved TCA under the authority granted to the federal government under 25 C.F.R. 151.3(a)(1)."

P1019-05

There are two significant and serious flaws with this analysis. Unfortunately for the BIA, these fatal flaws constitute the entire basis upon which the FTT application, and the related EA, are being processed. First, the referenced CAP was indeed approved by the Regional Director but was done without following appropriate procedure and without any opportunity for a hearing or discussion or a consideration of evidence. This decision by the Regional Director has been appealed by at least nine different organizations including the County of Santa Barbara. As a result, the CAP is invalid and cannot serve as the basis for moving forward with the FTT proposal. Second, the statement that a FTT proposal for property located within a TCA is given the same level of scrutiny as a FTT proposal on land within on or adjacent to a tribe's reservation is completely false. None of the regulations referenced by BIA support this conclusion. In fact, the regulations, specifically 25 C.F.R. Sections 151.10 and 151.11, and that BIA's own Fee To Trust Handbook, dated July 13, 2011, contradicts the statement contained in the EA. On-reservations discretionary trust acquisitions are governed by 25 C.F.R. Section 151.10 while off-reservations discretionary trust acquisitions are governed by 25 C.F.R. Section 151.11. The off-reservation discretionary trust acquisitions have a higher level of scrutiny than do on-reservation acquisitions. Pursuant to the BIA's own Handbook, the on-reservation discretionary trust acquisition procedures are for trust acquisitions on reservation and/or contiguous to a reservation. There is no mention anywhere of property within a TCA. Off-reservation discretionary trust acquisitions are governed by a separate set of procedures which deal strictly with off-reservation lands. The creation of a TCA does not make a property part of a reservation and there is nothing in any federal regulation that supports such a conclusion. Thus, the premise of the BIA in their opening section of the EA is erroneous and unsupported by law. Based on this alone, the EA should be returned to the BIA for further review and consideration in light of the different standards applicable to off-reservation fee to trust acquisitions.

P1019-05 Cont.

2. In discussing purpose and need, the EA states that the CAP constitutes the area historically held for the tribe by the Roman Catholic Church and sets forth a series of conclusory statements regarding this with absolutely no supporting evidence. The EA then states that the purpose of the CAP is to provide housing to the current members and anticipated growth. However, the suggested development proposal, 143 five-acre residential lots, is inherently inconsistent with the notion of housing 136 tribal members and approximately 1,300 lineal descendents. This inherent conflict is never addressed in the EA. For both of these reasons, the EA is inadequate and unsupported.

P1019-06

3. According to the regulations for implementing NEPA, lead agencies are required to evaluate a reasonable range of alternatives. In this case, the EA only considered one real alternative. The other alternative is the proposed project. Clearly, the use of only one alternative fails to meet the minimal NEPA requirements. This is especially important in light of the fact that once the land is placed in trust, the tribe would then have the authority to implement its own land use decision-making process and develop anything on the property. Given this significant issue, a reasonable range of alternatives should include a much larger variety of alternatives.

P1019-07

4. In discussing current proposal, Alternative A, the EA acknowledges that this FTT action would shift civil regulatory jurisdiction over the 1,433 acres from the State of California and Santa Barbara County to the tribe and the BIA. However, it fails to acknowledge the implications of this and simply assumes that the property will be developed as currently proposed by the tribe. As a result, the discussion in the EA of each of the potential environmental consequences of the project is fatally defective in that it fails to consider any development on the 1,400 acres other than the currently proposed five-acre lots. This is a fatal flaw because it fails to address the very foreseeable likelihood that the tribe, once the land has been secured in trust, will alter their land development plans for the property. The only way to legally rely on the proposed development plan for establishing a legally defensible environmental analysis, is to preclude the tribe from engaging in any other development plans other than that proposed as Alternative A. As everyone knows, that will never happen. Thus, it is reasonably foreseeable that the land uses on the 1,400 acres will be considerably more intense than that proposed. Unless a worst case analysis is prepared along with environmental consequences of that, the analysis contained in the EA is utterly lacking in evidentiary support and is making assumptions and presumptions that are unsupportable. P1019-08

5. The EA states that the development of Alternative A with the referenced mitigation measures will not result in significant adverse impacts to ground water resources. The mitigation measures do nothing to limit the use of ground water. In addition, it is reasonably foreseeable that the tribes will develop more intensely on the site and will seek to establish reserved ground water rights for the site which would have significant detrimental impacts on the surrounding community. P1019-09

6. The impacts to biological resources, especially oak trees, are clearly significant. The various proposed mitigation measures identified are completely inadequate to address these significant impacts. These impacts will be much more significant with more intense development which is not even addressed in the EA. P1019-10

7. The proposed project will create significant socioeconomic impacts to the residents of the Santa Ynez Valley including displacement, decreased property values, and a variety of related matters that are not even addressed in the EA. P1019-11

8. The EA concludes that impacts to land use will be less than significant with no necessary mitigation. This conclusion is reached with absolutely no support and is completely contradictory to the reality. As the EA acknowledges, if approved, the FTT would remove over 1,400 acres from the land use control of the state and the county right in the middle of the Santa Ynez Valley. Once that happens, the tribe will be able to implement whatever land uses they desire on the site without regard to the uses neighboring the 1,400 acres. To suggest that the removal of 1,400 acres from local land use control does not create a significant impact demonstrates, perhaps more than anything else in the EA, the arbitrary and capricious manner in which the BIA is acting with regard to this proposal. P1019-12

9. The EA suggests that development would be compatible with existing local conditions and visual impacts would be at a minimum. The reality is that development of any kind, even assuming such development is consistent with Alternative A, would have a significant impact on the visual character of the Santa Ynez Valley and all the areas surrounding the proposed project. Clearly, there will be a significant impact. P1019-13

10. The EA goes on to make similar unsupportable conclusions with regard to land resources, air quality, transportation and circulation, public services, and noise. In addition, the EA fails to even address health and safety concerns. P1019-14

For all of the reasons noted above, including the many unstated assumptions, inconsistencies, undisclosed methodologies, and unsupported conclusions, based on the minimal standards established by NEPA and its implementing guidelines, the EA is legally inadequate under NEPA. The failure of BIA to acknowledge these inadequacies and prepare a detailed and thorough EIS will result in a clear violation of NEPA. Based on all of the above, we request that the BIA prepare a detailed EIS regarding this proposed action. In addition, we request that the BIA acknowledge that any FTT proposal regarding this property be handled in a manner consistent with 25 C.F.R. Section 151.11 for off-reservation discretionary trust acquisitions. P1019-15

Sincerely,

William R. Devine

WRD:meg

COLAB

The Coalition of Labor, Agriculture & Business

10-28-2013

Ms. Amy Dutschke, Director
BIA Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Dear Director Dutschke,

We are submitting this letter in support of the proposed annexation of the Camp 4 Property by the Santa Ynez Band of Chumash Indians. We believe the existing reservation is too small in area and too burdened by geographical constraints to serve the housing needs of the Chumash. P1020-01

We also want to testify to the opposition against this project from members of the Santa Ynez Community and the County Board of Supervisors. We acknowledge the community has concerns about the "loss of control" should the BIA approve this project. However, what the BIA needs to understand is that the community itself is out of control when it comes to being anti-development and it is particularly obsessed with opposing any and all projects having anything to do with tribal enterprises and affairs, no matter how benign and regardless of whether the particular project involves property being taken off the tax rolls. P1020-02

The County and the community claim the Tribe should go through the normal channels and the routine permit path and thereby waive the right to ask for fee to trust. However, the truth of the matter is the previous owner of this property, the late Fess Parker, opted to do just that and was repeatedly rebuffed. He was told in no uncertain terms to not waste his time, energy and money because ANY project to develop Camp 4 would be soundly rejected. Mr. Parker is not the only property owner to be told to "not bother" asking for a change in zoning. We can cite numerous other recent examples including an infill development project in the middle of an existing golf course, and numerous other projects from throughout the county. The county has a notorious and national reputation as being anti-growth and anti- development. One particular development project has been tied up continuously in red tape despite the fact that the California Supreme Court ruled in favor of the property owner more than twenty years ago. Routine projects that conform to zoning can take years to get through the permit process and that is the case in the absence of organized opposition. P1020-03

All of this serves to justify the need for the fee to trust process because we believe it would be absolutely impossible for the Chumash to succeed any other way, except enabling legislation.

We believe the BIA must consider the community's and the Boards opposition to the annexation request in context. Most importantly, the County's controlling document affecting the Camp 4

COLAB PO Box 7523, Santa Maria, CA 93456 Ph. (805) 929-3148 Email: Andy@colabsbc.org

COLAB

The Coalition of Labor, Agriculture & Business

covers the entire Central Coast, and in my capacity as Executive Director, I am the primary guest editorial writer for the Santa Barbara News Press, the region's oldest and most prestigious newspaper. We submit four columns per week.

We indicate these things to denote that we are considered bonafide opinion leaders of the Central Coast and to certify that most people outside the Santa Ynez Valley do not resent the Tribe.

1020-03
(Cont.)

It is a fact, that many citizens throughout the region hold the Santa Ynez Band of Chumash Indians in high regard for the jobs they have created, the charities they have sustained, and the progress they have made in bettering the lives of their members and sustaining their ancestral traditions. We wish them the best.

Thank you for your consideration of our comments.

Sincerely,

J. Andrew Caldwell
Executive Director
COLAB

cc:

Vincent Armenta, Tribal Chairman
Santa Ynez Band of Chumash Indians
PO Box 517
Santa Ynez, CA 93460

Congresswoman Lois Capps
2231 Rayburn House Office Building
Washington, D.C. 20515

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COLAB

The Coalition of Labor, Agriculture & Business

10-28-2013

Ms. Amy Dutschke, Director
BIA Pacific Region
2800 Cottage Way
Sacramento, CA 95825

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We also want to testify to the opposition against this project from members of the Santa Ynez Community and the County Board of Supervisors. We acknowledge the community has concerns about the "loss of control" should the BIA approve this project. However, what the BIA needs to understand is that the community itself is out of control when it comes to being anti-development and it is particularly obsessed with opposing any and all projects having anything to do with tribal enterprises and affairs, no matter how benign and regardless of whether the particular project involves property being taken off the tax rolls. P1020-02

The County and the community claim the Tribe should go through the normal channels and the routine permit path and thereby waive the right to ask for fee to trust. However, the truth of the matter is the previous owner of this property, the late Fess Parker, opted to do just that and was repeatedly rebuffed. He was told in no uncertain terms to not waste his time, energy and money because ANY project to develop Camp 4 would be soundly rejected. Mr. Parker is not the only property owner to be told to "not bother" asking for a change in zoning. We can cite numerous other recent examples including an infill development project in the middle of an existing golf course, and numerous other projects from throughout the county. The county has a notorious and national reputation as being anti-growth and anti- development. One particular development project has been tied up continuously in red tape despite the fact that the California Supreme Court ruled in favor of the property owner more than twenty years ago. Routine projects that conform to zoning can take years to get through the permit process and that is the case in the absence of organized opposition. P1020-03

All of this serves to justify the need for the fee to trust process because we believe it would be absolutely impossible for the Chumash to succeed any other way, except enabling legislation.

We believe the BIA must consider the community's and the Boards opposition to the annexation request in context. Most importantly, the County's controlling document affecting the Camp 4

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COLAB

The Coalition of Labor, Agriculture & Business

covers the entire Central Coast, and in my capacity as Executive Director, I am the primary guest editorial writer for the Santa Barbara News Press, the region's oldest and most prestigious newspaper. We submit four columns per week.

We indicate these things to denote that we are considered bonafide opinion leaders of the Central Coast and to certify that most people outside the Santa Ynez Valley do not resent the Tribe.

1020-03
(Cont.)

It is a fact, that many citizens throughout the region hold the Santa Ynez Band of Chumash Indians in high regard for the jobs they have created, the charities they have sustained, and the progress they have made in bettering the lives of their members and sustaining their ancestral traditions. We wish them the best.

Thank you for your consideration of our comments.

Sincerely,

J. Andrew Caldwell
Executive Director
COLAB

cc:

Vincent Armenta, Tribal Chairman
Santa Ynez Band of Chumash Indians
PO Box 517
Santa Ynez, CA 93460

Congresswoman Lois Capps
2231 Rayburn House Office Building
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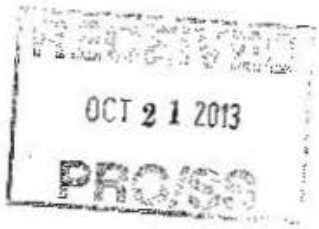

7 October 2013

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Comments of No More Slots on the Proposed Environmental Assessment For the Off-Reservation Transfer to Trust as Currently Proposed

Dear Director Dutschke;

Please find enclosed the comments submitted by No More Slots [NMS] concerning the Environmental Assessment for the proposed transfer of approximately 1,400 acres of off-reservation fee land commonly called the Camp 4 property owned by the Santa Ynez Band of Mission Indians, now calling themselves "Chumash". This parcel is situated within a purported "Tribal Land Consolidation Area" [TCA] approved by you shortly before the current fee to trust application was filed and which Environmental Assessment is based upon this erroneous T.C.A.

P1021-01

Respectfully submitted,

James E. Marino

THESE COMMENTS ARE MADE ON BEHALF OF THE COMMUNITY ASSOCIATION NO MORE SLOTS [N.M.S.] CONCERNING THE ENVIRONMENTAL ASSESSMENT SUBMITTED IN SUPPORT OF THE PROPOSED TRANSFER TO FEDERAL TRUST OF 1,400 ACRES OF "OFF-RESERVATION" LANDS OWED IN FEE BY THE SANTA YNEZ BAND OF MISSION INDIANS UNDER 25 C.F.R. 151.11.

Legal Deficiency and Complete Inadequacy of the Proposed Environmental Assessment

Virtually all of the analysis and findings set out in the Environmental Assessment [EA] for a proposed transfer of approximately 1,400 acres of off-reservation fee lands owned by the Santa Ynez band of Mission [Chumash] Indians, are based on a false and legally fatal premises. The Santa Ynez Band drew an arbitrary boundary line around approximately 14,500 acres, of largely private fee owned non-Indian lands, and made application to the Pacific Regional Director to create a "Tribal Land Consolidation Area." This area of land fictitiously claimed to be a "Land Consolidation and Tribal Acquisition Area" is not an Indian reservation or any part of one. Moreover it never was an Indian reservation or in any category of restricted lands. This Band of Indian descendants never had any rights to that land or exercised any tribal dominion, authority or control over it. The approval of that area of land as a tribal land consolidation area by the Pacific Regional director was made with no notice to interested parties and affected land owners and no verification of any of the relevant and critical facts in the application submitted by the Santa Ynez band. The approval of that land as a Tribal Land Consolidation Area is

P1021-02

arbitrary, capricious and contrary to law and that unlawful approval has been appealed by the County of Santa Barbara and numerous other groups and individual and land owners. Unless and until these appeals are determined the Environmental Assessment based entirely upon the erroneous existence of the Tribal Land Consolidation Area cannot be valid.

P1021-02 Cont.

Overview

Although voluminous, at over 900 pages in length the assessment contains a large number of attached computer-generated statistical documentation data not specific to the proposed fee to trust transfer and containing a great deal of redundancy and irrelevant information as discussed herein.

P1021-03

Patent Conflicts of Interest

In addition to the completely arbitrary, capricious and unlawful use of the Tribal Consolidation Area designation, the Pacific Regional offices are disqualified from approving any purported "application and approval of either a "Tribal Land Consolidation and Acquisition Plan" or approval of the proposed fee to trust transfer of the 1,400 acre Camp 4 property because of the existence of the overwhelming bias and conflict of interest that is so extensive as to prevent any fair and objective analysis and investigation required for review and approval of any tribal land consolidation and acquisition plan" or any transfer of fee owned Indian land from fee ownership into trust. It is a notorious fact that this agency has never denied any single tribal fee to trust application. In a recent Pepperdine University Law Review article the fee to trust

P1021-04

processes of this agency had been described as a "rubber stamp" bureaucracy that has permitted the existence of an improper "consortium" agreement whereby the tribe's seeking approvals for fee to trust transfers have paid their salary and evaluated their job performance and this is done by the very same tribal governments seeking those approvals.

P1021-04 Cont.

This constitutes a patent and unlawful conflict of interest preventing the unbiased analysis required of this agency by the applicable federal laws and rules in applying the criteria set out in both 25 C.F.R. 151.10 and 25 C.F.R. 151.11 in cases such as this one involving off-reservation fee to trust applications.

In addition, the same company furnishing environmental analysis for fee to trust transfers by Indian tribal governments and repeatedly concluding Findings of No Significant Impacts [F.O.N.S.I.] is a company hired over and over again and paid by the ostensible "lead agency" which is the very same B.I.A. Pacific Regional Offices making these same decisions.

P1021-05

Lack of Important Consultation

Although virtually all the public services and infrastructure impacted by the transfer of an initial minimum of 1,400 acres of land within the 11,500 acre so-called tribal land consolidation area, are provided by County and State agencies and other independent local agencies, it is conspicuous that these agencies, such as he Santa Barbara County Sheriff's Department, Fire Department, Air Pollution Control District, CALTRANS, the

P1021-06

3 affected school districts, Cachuma Operations Management Board, U.S. Forest Service and several other agencies were never even consulted. Section 6.0 of the EA listing agencies "consulted" demonstrate that none of these essential agencies, many of whom are directly impacted by providing required public services and infrastructure, were consulted.

P1021-06 Cont.

Hazardous Waste Sites

Having asserted that this 1,400 acre parcel is in effect part of a tribal land consolidation area or to be treated as a reservation then the existence of all hazardous waste sites must be identified and included in any EA. There are at least 4 known hazardous waste and contamination sites in the TCA, and the environmental assessment does not address any of them. These include the airport, Sanja Cota Creek used as a dump site by the tribe for many years, the "upper reservation" dump site, and the tribal land at the corners of Edison and State Route 246 where underground plumes of gasoline and hazardous chemicals have been detected, have not been cleaned up and threaten the existing water table and aquifers. The environmental assessment including the tribal land consolidation area is incomplete and inadequate in addressing hazardous waste.

P1021-07

Critical and integral Legal issues

As set out above the applicant tribe is claiming that by obtaining the approval of the Pacific regional Director the tribe has unilaterally created a 1,400 plus acre "Tribal Land Consolidation Area" and therefore the environmental assessment can be based upon criteria contained in 25 C.F.R. 151.10 instead of those required by 25 C.F.R. 151.11

P1021-08

As a result the Environmental Assessment fails to adequate address numerous key issues required to be considered acutely by 25 C.F.R. 151.11 before any proposed transfer of off-reservation fee lands to Indian trust can occur and be approved for lands that are now within the false and fictitious area, designated as a "Tribal Land Consolidation Area." That erroneous approach fails to recognize that the TCA determination is inextricably bound up with the EA for the 1,400 acre transfer to trust of land now purportedly lying within that erroneous TCA.

As a result of this false assumption the EA fails to consult with numerous local government agencies as required by 25 C.F.R. 151.11(c)(d). In addition the EA falsely assumes the fact that the proposed fee to trust transfer of the 1,400+ acre Camp 4 property is to be treated as if it were a fee to trust transfer to be made from within an existing reservation or treated as if it were a reservation, pursuant to 25 C.F.R. 151.10 and 25 C.F.R. 151.2 and 25 C.F.R. 151.3. In fact, even 25 C.F.R. 151.10(a) requires a showing of the statutory and underlying authority to transfer on-reservation fee lands into trust and this EA makes no effort whatsoever to do so and to establish any of the facts required to demonstrate this Camp 4 parcel is in fact located inside of any lawfully established Tribal Land consolidation area and therefore fails to meet the burden required by 25 C.F.R. 151.10(a).

P1021-08 Cont.

As a result of the erroneous reliance upon 25 C.F.R .151.10 instead of 25 C.F.R. 151.11 the EA is deficient in numerous instances in its analysis and facts set out therein to even discuss critical issues required let alone propose any required mitigations or alternatives.

Rather the writers of the EA glibly dismiss these issues by repeatedly stating "the land once in trust will be outside of the jurisdiction and control of the County government and other important regulatory agencies, as if to dismiss any need to even consider the impacts on these various State and local government agencies or even consult with them in direct violation of 25 C.F.R. 151.11(a), (c), and (d), and also 25 C.F.R. 151.10 (a), (b), (c), (d), and (e) as incorporated into 25 C.F.R. 151.11, the proper applicable rules.

P1021-08 Cont.

These defects in the analysis, based on the improper failure to apply criteria as required in 25 C.F.R. 151.11, is demonstrated throughout the EA and that is fatal to all and any conclusions reached as to impacts and any need for mitigation or alternatives.

Also the inclusion of the Santa Ynez airport into the "Tribal Land Consolidation Area," forming the basis for the fee to trust transfer of the 1,400 acre Camp 4 property thereby necessarily incorporates numerous federal regulations and rules imposed by the Federal Aviation Agency which was not only not consulted at all but that airport and those complex regulations are not even mentioned in the EA.

P1021-09

Lastly the findings and conclusions are violative of the National Environmental Policy Act [NEPA] for all the reasons hereinbefore set out and also for failing to comply with

P1021-10

the California Environmental Quality Act [CEQA] which is required for any tribal project being undertaken by a gaming tribe by the terms and conditions of the Tribal-State compact in effect.

P1021-10 Cont.

Respectfully submitted,

James E. Marino
Attorney for and on behalf of
No More Slots

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Reg Dir
Dep RD Trust
Dep RD IS
Route
Response Required
Due Date
Memo Ltr
Fax

22 October 2013

Amy Dutschke
Regional Director
Bureau of Indian Affairs
Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

Re: Comments of No More Slots on the Proposed Environmental Assessment For the Off-Reservation Transfer to Trust as Currently Proposed

Dear Director Dutschke;

Please find enclosed the comments submitted by No More Slots [NMS] concerning the Environmental Assessment for the proposed transfer of approximately 1,400 acres of off-reservation fee land commonly called the Camp 4 property owned by the Santa Ynez Band of Mission Indians, now calling themselves "Chumash". This parcel is situated within a purported "Tribal Land Consolidation Area" [TCA] approved by you shortly before the current fee to trust application was filed and which Environmental Assessment is based upon this erroneous T.C.A.

P1022-01

Respectfully submitted,

James E. Marino

Comments on the proposed fee to trust transfer proposed by the Santa Ynez Band of Mission Indians (now calling themselves The Santa Ynez Band of "Chumash" Indians) and based upon the earlier approval of a purported "Tribal Consolidation and Acquisition Area.

These comments are submitted on behalf of the community group No More Slots.

P1022-02

A. The 1,400 acre parcel of land proposed for fee to trust transfer.

The Santa Ynez Band purchased a parcel of land from the estate of the late Actor/land developer Fess Parker's probate estate. The parcel of approximately 1,400 acres was purchased in fee and is located in the Santa Ynez Valley near the intersection of State Routes 154 and 246.

This land was never part of any Indian reservation and never held in Indian trust status by the United State nor was it reserved by the United States at the time California became a State of the Union. There is no evidence that any Indian village or encampment of any Bands, Colonies, or Tribes of any particular recognized historical Indians ever inhabited this land and archeological surveys did not disclose and significant Native Indian artifacts or villages of any kind.

The Santa Ynez Band of Mission Indians, formerly referred to simply as "the Indians at Santa Ynez" or "the Santa Ynez Indians" was not a historical tribe as defined by 25 *Code of Federal Regulations* part 83 but rather was an unorganized community of Indians who settled on land near Santa Ynez where there was evidence of earlier Indian occupation. This group of mixed race Indian descendants only became a federally acknowledged Indian tribe sometime around 1964. Although this band was offered the opportunity to vote for or against the Indian Reorganization Act after it was enacted

P1022-03

on 18 June 1934 they never completed the process of seeking federal approval and acknowledgment or tribal recognition for thirty (30) years.

As set out in the Supreme Court's 2009 decision in *Carcieri v. Salazar* [555 U.S. 379] in order to be able to transfer land into trust a group of Indians must have been":

1. A functioning Indian ***tribe*** on or before 18 June 1934. A *functioning* Indian ***"tribe"*** entitled to acknowledgment and recognition is defined in 25 CFR part 83.7. The mandatory requirements to establish what it takes to be a functioning and valid Indian **tribe** are discussed thoroughly in the 2013 case heard before the Washington Circuit Court of Appeals and determined in their decision entered in *Muwekma Ohlone Tribe v Salazar*, [708 F. 3d 209]. The Indians at Santa Ynez were never a functioning **tribe** on or before 18 June 1934 and are not entitled to bring any land into trust using the administrative process and discretion of the Secretary of

P1022-03 (Cont.)

Interior as set out in the *Indian Reorganization Act 25 U.S.C. 465, et. seq.(I.R.A)*

2. Also, the Supreme Court in *Carcieri, supra.* held, that in addition to being a lawfully existing and functioning Indian tribe on the date the IRA was enacted, they also had to be under the federal government's superintendence, control and jurisdiction on 18 June 1934. The Indian community at Santa Ynez was ***not*** under federal superintendence, jurisdiction and control at that time.

P1022-03 (Cont.)

Therefore, as a preliminary matter, the currently described Santa Ynez Band of "Chumash" Indians, is not eligible to transfer any lands they own in fee into federal Indian trust status, because of the holding in the *Carcieri* case.

In addition to this disqualification, the Santa Ynez Band applied for and obtained the approval of the Pacific B.I.A. regional Director Amy Dutschke to define a large tract of land, encircled by a boundary line the band had arbitrarily drawn around some 11,500 acres of

P1022-04

privately owned fee lands, and called it a **"Tribal Land Consolidation and Acquisition Area" and alleged that this was authorized by 25 C.F.R. part 151.2(h) and 25 C.F.R. part 151.3** *et.seq.*
This approval by the Regional Director was without authority and was arbitrary, capricious and contrary to law, and the Director did not even notify the affected land owners who's land was included within this fictitious boundary nor any of the interested parties, including the governmental agencies having lawful jurisdiction, authority and control over these encircled privately owned fee lands.

P1022-04 (Cont.)

The proposed fee to trust transfer, as set out in the application filed by the Santa Ynez Indian community, relies entirely on this erroneous classification of the area as a *"Tribal Land Consolidation and Acquisition Area"* to justify the transfer into trust of this 1,400 acre parcel of ***"off-reservation", land owned by them in fee,*** and thereby attempt to utilize the analysis and criteria for such fee to trust transfer set out in 25 C.F.R. 151.10 instead of the mandatory criteria

set out in 25 C.F.R. 151.11 that must be applied in cases such as this.

P1022-04 (Cont.)

B. The improper analysis of trust transfer rules.

The fee to trust transfer of the 1,400 acre, so called "Camp 4" property, cannot be transferred into trust as applied for. The application to classify the 11,500 acres of fee land as a *"Tribal Land Consolidation and Acquisition Area"* was based on numerous false statements concerning that land. The entire area was part of a land grant that was given to the Catholic Church.

Because of claims that were being made by some members of a group of 5 families of Native Indians of mixed background, who had been occupying a small section of the grant with the permission of the Church, the Church had to file a lawsuit in Superior Court to Quiet the Title to the entire tract. In that Superior Court lawsuit, case no. 3926, the Plaintiff Church had to name all of the individuals occupying the land at that time as defendants because there was no tribe in

P1022-05

Comment Letters P1023 through P1102

Comment Letters P1023 through P1086

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the letters only provide comments on the fee-to-trust application associated with the EA.

Comment Letters P1087 through P1102

These comment letters are included in **Table 2-1** as they are part of the administrative record but copies were not provided herein as the letters were received by the BIA after the comment period deadline of November 18, 2013. The comments contained within these comment letters do not present any new topics or issues that are not already presented in the comment letters received within the comment period.

CHAPTER 3.0
RESPONSES TO COMMENTS

Responses to comments are organized below in two sections. General comments about the project and issues that were raised by multiple commenters are addressed first in **Section 3.1**. **Section 3.2** provides individual responses to each unique comment. All comment letters were reviewed; similar and identical letters and/or comments were grouped together and responded to in a single response. All of the comments, which have been bracketed for ease of reference, are provided in **Section 2.0** of this document. Refer to **Table 2-1** which provides an index of all of the comments received on the Environmental Assessment (EA). Once an issue is addressed, either in the General Responses (**Section 3.1**) or in an individual response to a comment (**Section 3.2**), subsequent responses to similar comments reference the initial response. Identical letters reference the initial letter and associated response. This format eliminates redundancy where multiple comments have been submitted on the same issue.

3.1 GENERAL RESPONSES

3.1.1 Extension of the Comment Period

Summary of Comments

Several commenters requested an extension of the comment period presented in the Notice of Availability released August 20, 2013. Commenters also expressed concern related to the furlough of government employees associated with the partial government shutdown on October 1 through October 16, 2013.

Response

The 30-day public comment period for the EA, established consistent with Section 6.2 of the Bureau of Indian Affairs National Environmental Policy Act (NEPA) Guidebook (59 IAM 3-H) (BIA NEPA Guidebook), began on August 20, 2013 and was noticed to end on September 19, 2013. In response to requests received, the public comment period was extended to October 7, 2013, providing an extension of 19 days. During the public comment period, the federal government was partially shut down on October 1, 2013 and returned to full operation on October 16, 2013. The Council on Environmental Quality (CEQ) issued guidance regarding NEPA documents under public review during the government shutdown that recommended extending any comment period deadlines held during the government shutdown by a minimum of the period of time equal to the shutdown (16 days). The comment period was therefore extended a second time to November 18, 2013. Overall, the EA was released for public review and comment for 90 days.

3.1.2 Tribal Consolidation Area (TCA)

Summary of Comments – BIA Approval of the TCA

Several comment letters included questions and concerns related to the Tribe's Tribal Consolidation and Acquisition Plan (Plan) and corresponding Tribal Consolidation Area (TCA). These concerns included jurisdiction of the Bureau of Indian Affairs (BIA) to approve a TCA under the Tribe's Plan, environmental review procedures relating to Plan approval, socioeconomic impacts of the TCA associated with private lands identified within the TCA, and consideration of cumulatively considerable impacts associated with taking all lands within the TCA into trust.

Response

In March 2013, the Tribe submitted the Plan to the BIA. The Plan identified a TCA encompassing approximately 11,500 acres within the Santa Ynez Valley, including the project site of the EA; the BIA approved the Plan on June 17, 2013. Several appeals were filed to the Interior Board of Indian Appeals (IBIA) requesting review of the BIA Regional Director's approval of the TCA. On October 11, 2013, the Tribe withdrew without prejudice the approved Plan and corresponding TCA via Resolution #926 Santa Ynez Band of Chumash Indians-Tribal Land Consolidation Area (included as Appendix P of the Final EA). The Tribe also requested that the BIA dismiss any appeals on the TCA without prejudice. In response to this request, the IBIA dismissed the appeals (Appendix Q of the Final EA). Accordingly, the Final EA has been updated to remove mention of the Plan and corresponding TCA.

Summary of Comments – Withdrawal of the Plan and TCA

Several comment letters were received stating that the EA was no longer valid as a result of the withdrawal of the TCA by the Tribe since the purpose and need of the EA as presented was no longer valid. In addition, several commenters stated that, with the withdrawal of the TCA, the EA does not provide an adequate assessment of the potential environmental impacts because, as stated in Section 1.2 of the EA, a trust acquisition within a TCA may be "given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation" (Section 1.2, page 1-5).

Response

The overall purpose of the trust acquisition request, as stated in Section 1.3, is to alleviate a housing shortage on existing tribal lands while providing full tribal governance over existing agricultural operations on the project site. The removal of the Plan and corresponding TCA from consideration in the Final EA does not alter the purpose and need as presented in the EA:

> This trust land acquisition is an integral part of the Tribe's efforts to bring tribal members and lineal descendants back to the Tribe, accommodate future generations, and create a meaningful opportunity for those tribal members and lineal descendants to be a part of a tribal community revitalization effort that rebuilds tribal culture, customs and traditions.

> In order to meet these goals, the Tribe needs additional trust land to provide housing for tribal members and lineal descendants who currently are not accommodated with tribal housing. (Section 1.3, page 1-7)

As stated in Section 1.2 of the EA, under the land acquisition policy defined under 25 CFR 151.3(a)(1), land may be acquired in trust status for a tribe when the property is located within a TCA and given the same level of scrutiny as land acquisition on or adjacent to a tribe's reservation. Off-reservation acquisition requests are addressed under 25 CFR 151.11. Additional scrutiny of the Tribe's justification of anticipated benefits from the trust acquisition is required by the Secretary of the Department of the Interior for off-reservation trust acquisition requests. The additional level of scrutiny does not apply to the environmental review process. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. The EA represents the BIA's "hard look" at the potential environmental impacts associated with the trust acquisition and proposed development by the Tribe. The Final EA has been updated to reflect the Tribe's request to withdraw the Plan and associated TCA.

3.1.3 Need for an Environmental Assessment (EA)/Finding of No Significant Impact (FONSI) Versus an Environmental Impact Statement (EIS)

Summary of Comments

Several commenters requested an Environmental Impact Statement (EIS) be prepared for the Proposed Action and subsequent development project. Comment letters stated that the EA is inadequate because it fails to take the "hard look" at potential significant impacts; fails to disclose all project components; uses an inaccurate baseline; contains inadequate mitigation; and incorrectly describes Camp 4 as an "On-Reservation" acquisition request. Commenters stated that the BIA, Santa Barbara County (County), and the public need to be fully informed about all potential significant environmental impacts of the proposed alternatives prior to any decision, and an EIS is therefore requested to provide such information.

Response

The Final EA has been prepared to address the impacts associated with the Tribe's revised application to have the project site taken into trust given the withdrawal of the Plan and associated TCA. The Final EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and addresses the potential impacts of the Proposed Action and development on all required resources. The Final EA provides adequate analysis to provide for a "hard look" at the trust acquisition's and proposed alternatives' environmental impacts. Preparation of the Final EA is consistent with the level of environmental review and scrutiny provided for other similar BIA actions for trust acquisition requests for tribal housing projects.

The Final EA has been prepared to address all components of the Proposed Action and project alternatives. The project description is provided in Section 2.0 of the Final EA, which clearly states that several site plans are being considered by the Tribe and provides two representative site plans incorporated as the alternatives for analysis within Section 4.0 of the EA (all site plans being considered are included as Appendix N of the EA). The project description provides the necessary level of detail required to assess the potential environmental impacts of each proposed alternative and includes such details as a description of the proposed land uses on the project site; the proposed residential development intensity, including the proposed area of disturbance for each residence; a description of the proposed tribal facilities and square footages for each component; and the anticipated number of events, employees, and parking spaces. Section 2.0 of the EA also includes details regarding the ancillary development projects that would support the proposed development, such as public safety and fire protection, water and wastewater demands, circulation, grading and drainage, project construction, and BMPs that would be incorporated into project design to reduce the environmental impact of development. Per the BIA NEPA Guidebook, the Final EA incorporates the required components of the project description, including the identification of the lead agency and the applicant, descriptions of the project alternatives, and timing considerations. The level of detail provided within Section 2.0 of the Final EA allows for the comparison of the project alternatives to the environmental baseline presented in Section 3.0 and the subsequent discussion and analysis of associated environmental impacts presented in Section 4.0 of the Final EA. For example, Section 2.0 provides a summary of various technical studies conducted to determine the appropriate supporting infrastructure required to develop each project alterative. These studies, including a Grading and Drainage Study and Water and Wastewater Feasibility Study, are referenced in Section 2.0 and are included as appendices to the Final EA.

In accordance with the BIA NEPA Guidebook, the Final EA assesses the existing conditions of the environmental resources that may be impacted by the trust acquisition and subsequent tribal development. The baseline of the existing resources consists of the existing conditions anticipated at the time the project would be developed. The appropriate baseline conditions per each resource are presented in Section 3.0. For example, soil resources on the project site are the appropriate baseline condition to determine erosion impacts associated with the construction of the project components, whereas the off-site roadway network is assessed as the appropriate baseline condition for impacts to transportation and traffic from construction activities. In addition, the baseline conditions assume that providing new tribal housing would not result in a substantial change in the population. While some homes vacated by tribal members living in the area may result in new residents moving to the area, many of the tribal members currently live in multiple-family units on the Reservation. Accordingly, there wouldn't be a substantial increase in population in the Santa Ynez region.

Mitigation, as defined by the CEQ Regulations for Implementing NEPA (40 CFR 1508.20), can include avoidance measures; decreases in the magnitude of the action and its implementation; reparation, rehabilitation, or restoration of the affected environment; preservation and maintenance activities; and compensation through replacement or substitution of the affected resource or environment. Mitigation

measures are presented in Section 5.0 of the Final EA. As stated in Section 5.0, the mitigation measures presented would minimize identified impacts and incorporate the definition of mitigation presented by the CEQ Regulations for Implementing NEPA. The Tribe will be legally bound to implement mitigation measures, which are necessary to reduce adverse impacts to a minimal level, because it is intrinsic to the project, required by federal law, required by agreements between the Tribe and local agencies, and/or subject to a tribal resolution. Refer to **General Comment 3.1.2** regarding the withdrawn Plan and corresponding TCA. Accordingly, the trust acquisition project constitutes an off-reservation acquisition request, and the Final EA meets the environmental review requirements under NEPA for such a trust acquisition.

Furthermore, the BIA NEPA Guidebook (2012) states an "EA is the document that provides sufficient analysis for determining whether a proposed action may or will have a significant impact on the quality of the human environment and therefore requiring the preparation of an EIS. If the EA does not reveal any significant impacts, a FONSI is prepared… [whereas if] the analysis in the EA identifies significant impacts, then an EIS will be prepared" (BIA, 2012). Since the Responses in the above-referenced sections and Final EA provide sufficient analysis to support the conclusion that the Proposed Action would not have a significant impact on the quality of the human environment, an EIS is not required.

3.1.4 Chumash Casino Resort

Summary of Comments

Several commenters raised concerns related to environmental impacts of the existing Chumash Casino Resort.

Response

Impacts associated with the existing operations at the Chumash Casino Resort constitute the baseline condition of the existing environment and, although they are not explicitly referenced, are addressed where relevant in the baseline discussion within Section 3.0 of the EA. For example, traffic counts were collected along the existing roadway network during peak hours to determine baseline traffic conditions, and any trips generated by the existing casino were captured within the collected traffic counts. Aside from contributing to the baseline condition of the existing environment, environmental impacts associated with the existing operations at the Chumash Casino Resort are not relevant to this EA.

3.1.5 Purpose and Need

Summary of Comments – Proposed Number of Residences Compared to Tribe Population

Several commenters questioned the purpose and need for the proposed development. In particular, commenters requested justification for the proposed 143 home sites if the Tribe has 136 members and 1,300 lineal decedents.

Response

As stated in Section 1.3 of the EA, the purpose of the proposed development (development of 143 residential units) is to provide housing for its existing tribal members and continue to provide housing for descendants as they come of age. The construction of 143 homes would provide the necessary number of units to address the current housing shortage.

Summary of Comments – Preference to Trust Acquisition Process versus County Process

Several commenters stated that the need for a trust acquisition was not justified because the Tribe could still achieve its purpose of providing tribal housing for members by developing the project site through the County approval process.

Response

The trust acquisition process is codified in 25 CFR 151 and outlines the process for the federal government to take land into trust on behalf of a tribe (or tribal member). The purpose of the trust process is to establish land bases for tribes to support their sovereign right to self-governance. Trust acquisition is one of the federal Indian trust responsibilities of the federal government. The federal Indian trust responsibility is a legal obligation under which the United States "has charged itself with moral obligations of the highest responsibility and trust" toward Indian tribes (Seminole Nation v. United States, 1942). This obligation was first discussed by Chief Justice John Marshall in Cherokee Nation v. Georgia (1831). Over the years, the trust doctrine has been at the center of numerous other Supreme Court cases, thus making it one of the most important principles in federal Indian law. The federal Indian trust responsibility is also a legally enforceable fiduciary obligation on the part of the United States to protect tribal treaty rights, lands, assets, and resources as well as a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes and villages. In several cases discussing the trust responsibility, the Supreme Court has used language suggesting that it entails legal duties, moral obligations, and the fulfillment of understandings and expectations that have arisen over the entire course of the relationship between the United States and the federally recognized tribes.

Furthermore, because the Constitution vested the Legislative Branch with plenary power over Indian Affairs, states have no authority over tribal governments unless expressly authorized by Congress. While federally recognized tribes generally are not subordinate to states, they can have a government-to-government relationship with these other sovereigns as well. Federally recognized tribes possess both the right and the authority to regulate activities on their lands independently from state government control. They can enact and enforce stricter or more lenient laws and regulations than those of the surrounding or neighboring state(s) wherein they are located. Yet, tribes frequently collaborate and cooperate with states through compacts or other agreements on matters of mutual concern such as environmental protection and law enforcement. For the Tribe to fully submit to the jurisdiction of the State and local jurisdictions would contradict the right of tribal self-governance. Therefore, the Tribe is seeking the trust acquisition

of the project site to extend its sovereign right to self-governance in additional to meeting the Tribe's need for housing.

3.1.6 Air Quality and Traffic

Summary of Comments

Several commenters expressed concerns as to the amount of traffic that would be generated by the development of new residences and tribal facilities in a rural area of the County, in particular the traffic that would be generated by the anticipated 100 annual events at the banquet/exhibition hall proposed under Alternative B. Concerns included the impact on safety and road infrastructure as well as the impact on air quality in the Santa Ynez Valley associated with an increase in the volume and frequency of traffic on rural roads. Some commenters acknowledged that the EA states that existing roads would be improved but request additional information and details of such improvements. Comments also stated that the EA fails to analyze the impacts of additional traffic that would result from future development on the project site.

Response

Traffic that would be generated by the proposed alternatives is analyzed in the April 12, 2012, Traffic Impact Study (TIS) prepared by Associated Transportation Engineers (Appendix I of the EA). The results of the TIS are summarized in Sections 3.7, 4.1.7, 4.2.7, and 4.4.7 of the EA. An additional 260 P.M. peak hour trips, including 166 trips attributed to the banquet/exhibition hall (Alternative B), would be added to local roadways under Alternative B, which has the highest trip generation of both alternatives (refer to Table 5 of the TIS). The results of the impacts assessment indicate that one study roadway intersection would operate at a less-than-acceptable level of service (LOS) with the addition of project-related traffic: the intersection of SR-246 at SR-154, which would operate at LOS F (Tables 11 and 12 of the TIS). However, since the release of the EA, the California Department of Transportation (Caltrans) has begun construction of a traffic circle at the intersection of SR-246 at SR-154, which was recommended in the TIS and included in Section 5.7 of the EA. With implementation of this safety improvement, the intersection of SR-246 at SR-154 would operate acceptably both in the near-term and cumulative conditions. The impact on safety and road infrastructure from either project alternative would therefore not be significant under the roadway operational criteria of either the County or Caltrans.

An air quality analysis is provided in Sections 4.1.3 and 4.2.3 of the EA. Traffic trips generated by proposed alternatives are included in the air quality analysis, as shown in the URBEMIS 9.2.4 (URBEMIS, 2007) air quality output files provided in Appendix B of the EA. Emissions of criteria air pollutants (CAPs) would not exceed federal de minimis levels of 100 tons per year (the significance threshold for CAP emissions), and accordingly impacts to regional air quality would be less than significant.

Commenters are correct in that implementation of Alternative A or B would require improvements at the intersection of SR-246 and SR-154. Mitigation is included in Section 5.7 is provided which would result in a level of service A in the near term cumulative with project. Caltrans is currently implementing this mitigation with a completion date of 2015. No reasonably foreseeable future development would occur on the project site beyond what is described in the Final EA.

The analysis of impacts to traffic and transportation has been updated in Sections 4.2.7 and 4.4.7 and Appendix I of the Final EA to reflect revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17** for further discussion) and to reflect updates in the cumulative environment. The analysis of impacts to air quality has been updated in Sections 4.1.3, 4.2.3, and 4.4.3 and Appendix B of the Final EA also to reflect revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17** for further discussion), to reflect updates in the cumulative environment, and to utilize the California Emission Estimator Model 2013.2.2 (CalEEMod), which has become the preferred air emissions modeling software since the release of the EA.

3.1.7 Biological Resources

Summary of Comments – Analysis Inadequate

Several comments stated that the impacts to biological resources are inadequately addressed in the EA.

Response

Biological resources are addressed in Sections 3.4, 4.1.4, 4.2.4, and 5.4 of the EA. A list of regionally occurring federally-listed species in the vicinity of the project site was compiled based upon a review of pertinent literature, aerial photographs, site topographic maps, a map of special-status species reported within five miles of the project site, a map of U.S. Fish and Wildlife Service (USFWS) designated critical habitat for federally-listed species in the vicinity of the project site, informal consultation with the USFWS, and lists of regionally occurring special-status species. In addition, a biologist and botanist conducted biological surveys and informal delineations of the project site. The biological surveys consisted of walking and/or driving throughout the project site to characterize terrestrial and aquatic habitat types and evaluate their potential to support regionally occurring federally-listed species. Terrestrial habitats were classified, where applicable, using California Wildlife Habitat Relationships (CDFW, 2005). Potentially jurisdictional waters of the U.S., other than wetlands, were determined using the U.S. Army Corps of Engineers (USACE) regulations (33 CFR Part 328). Aerial photographs were used to document preliminary boundaries of habitat types during the fieldwork. All visible plants and wildlife were noted and identified to the lowest possible taxon necessary to determine rarity and listing status.

Botanists also conducted focused botanical surveys in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW Protocols) (CDFW, 2009). The protocol recommends one or multiple surveys should be conducted

during a season when species are evident and identifiable. Results were not observed to change notably over multiple surveys conducted over multiple seasons and years; therefore it can be concluded that false-negative results (such as missed species verifications) were minimized to the greatest extent feasible. The surveys were performed by a CDFW approved, qualified botanist familiar with plant communities in the area and who has performed numerous botanical surveys for CDFW and other agencies throughout the state of California. All plants observed within the project site were documented during the botanical inventories (Appendix E of the Final EA).

Global Positioning System (GPS) technology, a Trimble Geo XT™ receiver, was used to locate and map preliminary boundaries of waters of the U.S. during the 2011 and 2012 fieldwork. The geographic coordinate system used to reference the data was Universal Transverse Mercator (UTM–Zone 10), North American Datum (NAD83) in meters. Potential wetland boundaries (including vernal pools) were mapped at a level of accuracy of less than one meter. Habitat boundaries were identified during the biological surveys on an aerial photograph. Environmental Systems Research Institute (ESRI) shape files were generated based on the habitat boundaries, potentially jurisdictional waters of the U.S., and other sensitive biological resources mapped within the project site. Geographic analyses were performed using Geographic Information System (GIS) software (ArcView 3.3 GIS, ESRI, Inc.). The ESRI data and GIS software were used to calculate the acreages of habitat types and wetland features.

A list of regionally occurring federally-listed species was compiled based on the USFWS, California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) lists. The potential for each of the regionally occurring federally-listed species to occur on the project site was subsequently evaluated based on the results of the biological surveys and the focused botanical surveys, review of applicable literature, and proximity of known occurrences of special-status species within five miles of the project site. The distribution and habitat types for each federally-listed species and the potential for each species to occur on the project site are included in a list provided in Appendix E of the Final EA. Several regionally occurring federally-listed species were eliminated from consideration either because the project site lacks suitable habitat or the project site occurs outside of the known elevation range or geographical distribution of the species. Based on the potential presence of federally-listed special-status species (or associated habitat), avoidance measures were incorporated as mitigation in Section 5.0 of the Final EA. As explained in the Final EA, implementation of either alternative with mitigation measures identified in Section 5.4 would not result in a significant adverse impact to biological resources.

As discussed in Section 3.4 of the EA, the Vernal Pool Fairy Shrimp (VPFS) is a federally-listed species and is listed under the *Recovery Plan for Vernal Pool Ecosystems for California and Southern Oregon* (Vernal Pool Recovery Plan) (USFWS, 2005). The southern portion of the project site occurs within the Santa Barbara Vernal Pool Region within the Lake Cachuma core area of the Vernal Pool Recovery Plan (USFWS, 2005). Although the vernal pools present on site did not contain water during the September 2011, March 2012, and April 2012 biological surveys (text was updated in Section 3.4 of the Final EA to be consistent with this finding), and consequentially, no VPFS were observed during those surveys, VPFS

are considered to have the potential to occur within the project site because the project site falls within the Lake Cachuma core area. Because the impact assessment in Sections 4.1.4 and 4.2.4 of the EA assumes presence, protocol-level VPFS surveys are not required. The EA states that implementation of the Alternatives A and B could adversely impact VPFS due to the assumed fill of habitat on the project site. A Biological Assessment (2013 EA Appendix E) has been prepared and has been submitted to the USFWS pursuant to Section 7 of the FESA (Appendix R of the Final EA). Sections 4.1.4, 4.2.4, and 5.4 of the Final EA have been updated to incorporate the mitigation included in the Biological Assessment, and the Tribe is committed to avoiding development within VPFS habitat on the project site. Avoidance measures, such as proper placement of high-visibility fencing and establishment of staging areas away from confirmed wetland features during construction, will be implemented so that potential habitat is more fully protected from the effects of construction. VPFS habitat sensitivity training will also occur to reduce potential impacts to VPFS to a minimal level.

Although State-listed special-status species are sometimes not afforded protection under FESA, Section 3.4 of the EA addresses the potential for state-listed special-status species to occur on the project site. As discussed therein, while one State-listed species, the western pond turtle (*Emys marmorata*), may have potential to occur within the project site, the likelihood of occurrence within the project boundaries is minimal. The nearest recorded occurrence of the western pond turtle is approximately four miles southwest of the project site. While the manmade storage basin within the vineyard provides a ponded water source, the habitat is marginal given the lack of emergent vegetation. In addition, this species was not observed during the September 2011, March 2012, and April 2012 surveys. Considering the western pond turtle is not afforded protection under FESA, minimal suitable habitat is located within the project site, and the species was not observed during the biological surveys, potential impacts associated with the western pond turtle are not further addressed within the EA.

3.1.8 Cultural Resources

Summary of Comments

Various comment letters contended that the EA failed to adequately address cultural resources and failed to demonstrate the cultural significance of project site to the Tribe.

Response

Existing cultural resources and the historical significance of the project site are addressed in Section 3.5 of the EA. The Tribe's historical and cultural ties to the project site are discussed therein. A Phase 1 and Phase 1.5 Archaeological Investigation of the project site was conducted in June 2011 and revised in December 2013 and February 2014 (Archaeological Investigation) (Archaeology Assessment and Management, 2011). The Archaeological Investigation included a records search, Native American consultation, and intensive field survey to identify and evaluate any prehistoric and historic-period resources, including traditional cultural properties, within or adjacent to the project site. The Archaeological Investigation is confidential due to the sensitive nature of historic resources. Therefore,

the document is included as a confidential appendix to the Final EA (Appendix F) to ensure sensitive information is protected. The cultural resources study has been reviewed by the appropriate State and Federal agencies to ensure compliance with Federal regulations. Potential impacts to cultural resources are evaluated in Sections 4.1.5, 4.2.5, 4.3.5, and 4.4.5 of the EA, and mitigation measures were included in Section 5.5 of the EA to reduce or avoid adverse impacts in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Impacts to cultural resources were assessed in accordance with Section 106 of the National Historic Preservation Act (NHPA), and concurrence was received from the SHPO on March 6, 2014 that no adverse impacts to cultural resources would occur from the implementation of the Proposed Action (included as Appendix S of the Final EA). Cultural resources were adequately addressed within the EA.

3.1.9 Water Resources

Summary of Comments – Drainage and Water Quality

Several commenters stated that the EA did not clearly describe how the Tribe would protect water quality during construction and operation of the proposed alternatives.

Response

The impacts of Alternatives A and B related to drainage and water quality are addressed in Sections 4.1.2 and 4.2.2 of the EA, respectively. As discussed, construction activities and runoff from residential and community facilities could transport debris, oil, sediments, and grease into adjoining surface waters, potentially affecting surface water and groundwater quality. Increased runoff could create scouring and could impact riparian and aquatic habitats and seep into groundwater aquifers. To reduce the effects of increased surface runoff volume and associated pollutants, the Tribe will comply with the terms of the U.S. Environmental Protection Agency's (USEPA's) National Pollutant Discharge Elimination System (NPDES) Construction General Permit and will prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to ensure that Best Management Practices (BMPs) and mitigation measures, including as those listed in Section 2.2.10 and Section 5.2, are used to reduce the risk of soil erosion and polluted discharge. This would reduce potential construction-related adverse impacts to surface and ground waters to a minimal level. Additionally, roadways will be designed with improvements such as culverts, bridges, basins, and crossings to reduce adverse impacts to minimal levels. In addition, BMPs listed in **Section 2.2.10** and mitigation measures listed into **Section 5.2** would ensure irrigation rates of treated wastewater are monitored and are appropriate for the time of year to minimize incidental runoff. During the non-irrigation season, recycled water would be stored in the existing water reservoir that located near the WWTP building on Parcel 1. Adverse impacts to surface water and groundwater quality associated with wastewater treatment and disposal would be minimal and would be in full compliance with USEPA standards. Accordingly, implementation of Alternatives A and B would not adversely impact beneficial use designations of regional water resources.

The wastewater treatment plant (WWTP) under both Alternative A and B would be designed to ensure recycled water meets the same requirements as California Code of Regulations, Title 22, which is indicative of water quality that is acceptable for irrigation of crops, including edible crops. BMPs listed in Section 2.2.10 and mitigation measures listed into Section 5.2 would ensure irrigation rates are monitored and are appropriate for the time of year to minimize incidental runoff. During the non-irrigation season, recycled water would be stored in the existing water reservoir located near the WWTP on Parcel 1. Impacts to surface water and groundwater quality associated with wastewater treatment and disposal would be minimal and not constitute a significant impact as the WWTP would be in full compliance with USEPA standards.

Alternative A would increase impervious areas on Parcels 1, 2, 3, and 4 by three percent as a result of the construction of tribal residences, the WWTP, utilities, and improvements to and construction of roads and sidewalks. This change is minimal and the increase in peak flows on the project site varies between less than 1 cubic foot per second (cfs) to a maximum of 9 cfs compared to existing conditions for 2- to 100-year storm event peak flows (Appendix D of the Final EA). Drainage would flow through a total of 21 road crossings prior to being discharged from the project site, which would pass over potential Waters of the U.S and may require permits from the USACE (Appendix D of the Final EA). The grading and drainage feasibility analysis for Alternative A recommends the incorporation of 7 detention basins within Parcels 2 and 4 into the project design to ensure discharge of stormwater runoff occurs at the same rate as during existing conditions for 2 to 100 year, 24-hour storms (Appendix D of the Final EA). Alternative B would minimally increase impervious surfaces by approximately 4 percent on Parcels 2 and 4. The increase in peak flows would be up to 14 cfs compared to existing conditions for the 100-year, 24 hour peak storm events (Appendix D of the Final EA). Stormwater runoff generated on the project site would flow through a total of 13 road crossing, surface swales, and permeable surfaces to 1 of 7 detention basins within Parcel 2 to ensure off-site stormwater peak discharge rates are the same rate as those under existing conditions for the 2- to 100-year storm events. Basins developed under both alternatives would be approximately 100 feet by 400 feet, with depths of up to 15 feet, and would be shaped and designed to match the project site's terrain. Other minor drainage improvements for both alternatives include the incorporation of Low Impact Development (LID) features into the project design, such as: designing roads of minimal paved width to lessen the impermeable area; vegetative swales along unpaved shoulders to help further the velocity of the runoff and allow for sediment to drop out of the flow prior to entering the existing channels; and infiltration planters incorporated into open space and recreation areas. Culverts would be constructed to assure that drainage is not impeded at sites where the proposed access road crosses existing drainage courses. Culvert crossings would be sized to allow a 25-year, 24-hour storm event to drain without creating backwater or flooding of existing and proposed roads. Bridge crossings and detention basins would be designed for the 100-year, 24-hour storm events (Appendix D of the Final EA). Additionally, the Tribe would address drainage-related concerns at the WWTP proposed under both alternatives by re-purposing and, if necessary, enlarging the existing man-made water reservoir to store recycled water from the WWTP. The Tribe would install drainage control along the perimeter of the recycled water irrigation areas to prevent comingling with stormwater runoff and capture recycled water

runoff for disposal at the WWTP. With the implementation of stormwater drainage improvements recommended in Appendix D of the Final EA and the protective measures and BMPs discussed in Sections 2.2.8, stormwater flows on the project site, including from the WWTP facility, post-development would equal existing runoff rates. Thus, both alternatives would result in no significant adverse impacts from stormwater runoff generated as a result of the proposed development.

Summary of Comments – Groundwater Use

Numerous commenters expressed concerns that the EA failed to adequately address the use of groundwater as the water source for the proposed alternatives. Commenters stated that insufficiencies included a dated and therefore inaccurate characterization of the capacity and water quality of the existing wells on the project site, inaccurate assessment of water demands for the proposed alternatives, insufficient mitigation measures given that the aquifer is in overdraft, and a lack of analysis of potential impacts to groundwater resources in the cumulative scenario.

Response

Existing groundwater resources are described in Section 3.2. A Water and Wastewater Feasibility Analysis (Appendix C of the EA) was prepared to assess water needs of Alternatives A and B. The impact assessment in Section 4.1.2 of the EA states that although the Santa Ynez Uplands Groundwater Basin (Uplands Basin) may be in a state of overdraft (based on 2001 data), altered pumping patterns throughout the County and importation of supplemental water has resulted in more balanced groundwater conditions that have the capacity to serve the needs of the project alternatives. These changes in water use and the rising water table in the project area suggest that the three existing wells can be relied upon for agricultural use (Appendix C of the EA). As described in Sections 4.1.2 and 4.2.2 of the EA, the Tribe would develop two new wells to meet potable water demands of Alternatives A and B. The mitigation included in Section 5.2 of the EA would ensure the new wells would tap the relatively unexploited Careaga Formation and therefore would not adversely impact neighboring wells.

To more accurately determine the production capabilities and water quality of the three existing wells, the Tribe conducted additional field well pumping tests and water quality analysis in January and February 2014 (Appendix C to the Final EA). The results of these tests and analyses confirm that the existing wells have adequate capacity and water quality is sufficient to support the existing and proposed agricultural land use on the project site. Further, with the use of recycled water for irrigation of the vineyard, agricultural demands for groundwater would be reduced compared to existing conditions.

The California Department of Water Resources estimates the storage capacity of the Upland Basin at about 10 million acre feet (AF), and the available water in storage is estimated to be approximately 900,000 AF (DWR, 2004). The safe yield (annual basin withdrawal rate at which no long term significant impacts to water levels are anticipated) is estimated at approximately 11,500 acre-feet per year (AFY) (Santa Barbara County, 2012). The EA stated that groundwater within the Uplands Basin is in a state of overdraft, which was based on a 2001 study that stated the Uplands Basin was estimated to be in a state of

overdraft by about 2,000 AFY (Santa Barbara County, 2012). At that time, water agencies in the region were reducing demand on groundwater and supplementing water demands with the State Water Project. In 2002, the Santa Barbara County Water Agency (SBCWA) commissioned an independent study of the Uplands Basin, which concluded that increases in imported water resulted in a basin that was balanced or in a state of slight surplus (Santa Barbara County, 2012). Additionally, more recent planning documents have indicated that the Uplands Basin has surplus supply. The 2009 Final EIR for the Santa Ynez Valley Community Plan (SYVCP) identified a surplus of approximately 513 AFY within the Uplands Basin (Table 4.9-2; Santa Barbara County, 2009b). The SYVCP states that at least several hundred AF of new long-term demand on the Uplands Basin could be accommodated without substantial effects on the basin (including impacts to flows of regionally important surface waters such as the Zanja de Cota Creek) (Santa Barbara County, 2009a). SBCWA's 2011 report (page 53) further states that groundwater pumped by the City of Solvang may actually be from a perched aquifer that is not within the Uplands Basin. The pumpage rates may therefore have erroneously been included in prior Uplands Basin pumpage estimates. Regardless, the Tribe is committed to conserving water and minimizing its impact on groundwater supplies during operation of the selected project alternative.

Since the release of the EA and in response to current economic conditions in the Santa Ynez Valley and surrounding area, the Tribe revised the vineyard development plans under Alternatives A and B to reduce vineyard production by 50 acres and to exclude the banquet/exhibition hall as a component of the proposed tribal facilities (refer to **General Response 3.1.17**). Potable water supply demands for the residential aspects of Alternative A would be met via connection to two new wells. These two new wells would provide groundwater supply redundancy as well as allow flexible pumping schedules. The net water demand for Alternative A (agricultural demands plus residential demands minus recycled water use) is 348 AFY (refer to Table 2-4 of Appendix C of the Final EA). Under existing conditions, approximately 256 AFY of groundwater is utilized on the project site, with an increase to 300 AFY under the No Action Alternative (refer to **General Response 3.1.18**). Accordingly, implementation of Alternative A would result in a net increase in water use of approximately 92 AFY compared to existing conditions and a net increase in water use of approximately 48 AFY compared to the No Action Alternative. As discussed above, according to local planning documents, the Uplands Basin has a surplus of several hundred AFY (estimate in the SYVCP to be approximately 513 AFY) of safe yield. Therefore the increase in use with the implementation of Alternative A over existing conditions would result in less than significant impacts to the Uplands Basin. Because less residential landscape would be irrigated under Alternative B, even taking into account water use at the tribal facilities, implementation of Alternative B would result in a slight net increase in water use of approximately 4 AFY compared to existing conditions and a net reduction in water use of approximately 40 AFY compared to the No Action Alternative. Compared to the No Action Alternative, the decrease in net water use of Alternative B would result in a beneficial impact to the Uplands Basin.

3.1.10 Land Use

Summary of Comments – Incompatible with Existing State and Local Government Plans and Existing Land Uses

Several comment letters expressed concerns that the proposed alternatives are incompatible with existing State and local government plans and would thereby constitute an adverse impact on land use. These concerns were primarily related to the goals and polices contained in the Santa Barbara County Comprehensive Plan and the SYVCP. Additionally, several comments contended that the EA fails to assess if the proposed land uses of Alternative A and Alternative B on the project site are compatible with the existing land uses of the surrounding area, stating that the residential and tribal facilities, including the banquet/exhibition hall, are incompatible with the surrounding agricultural community for reasons such as an increased potential for trespassing, vandalism, theft, and grass fires on agricultural lands as well as increased nuisance complaints from farmers. Comments also stated that the proposed alternatives would result in decreased farming productivity because growers would have to implement special management practices due to the close proximity of a residential development and because traffic, noise, and proximity of attendees at the banquet/exhibition hall would negatively impact farm production.

Response

Existing conditions for the project site with regards to local government and land use plans are fully described Section 3.8 of the EA, and potential impacts of the proposed alternatives to land use designations are fully described in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA. These sections correctly note that local land use and zoning designations would no longer apply after the land is taken into trust. NEPA requires an assessment of the project effects on and compatibility with adopted land use plans. Accordingly, the land use assessment methodology presented in Section 4.1.8 of the EA states that adverse impacts to land use would result if an incompatible land use within the project parcels would result in the inability of the County to continue to implement existing land use policies outside of the project boundaries.

As acknowledged in Section 4.1.8, the development of tribal housing on the 1,433-acre property would not be consistent with the allowed land uses under the AG-II-100 zoning and AC land use designation identified by the Santa Barbara County Comprehensive Plan if it remained under the jurisdiction of the County; however, it would be compatible with the surrounding low density rural residential developments to the north and moderately dense residential development adjacent to the northeastern border of the project site. These adjacent residential areas are clearly visible in the aerial photo in Figure 1-3 of the EA. Growers in the vicinity of the project site should already be implementing special management practices related to residential development given that the nearby surrounding areas are zoned for AG-I-5, AG-I-10, AG-I-20, and AG-II-40, which allow for single-family dwellings, residential accessory uses and structures, and residential agricultural units on minimum lots sizes of 5, 10, 20, and 40 acres, respectively. The dedicated land uses for the remainder of the project site under Alternative A (agriculture, open space, and resource management zone) would account for 44 percent of the total land uses on the project site

after taken into trust and would be consistent with the zoning and land uses north, west, and south of the project site. Therefore, implementation of Alternative A would not conflict with surrounding land uses and would not impede the County's ability to enforce the Santa Barbara County Comprehensive Plan, SYVCP, and other relevant land use regulations. Additionally, the proposed development on the project site is consistent with the many ranchette subdivisions that have been developed in the Santa Ynez Valley over the last forty years, setting a historical precedent (Urban Planning Concepts, 2014). Implementation of Alternative A would result in less than significant impacts to land uses.

As discussed in Section 4.2.8, Alternative B would generally result in the same impacts to land use as Alternative A although to a slightly lesser extent given that Alternative B is a reduced-intensity version of Alternative A. Total residential land use and utilities would cover approximately 197 acres compared to the approximately 796 acres proposed under Alternative A. The 1-acre resident plots proposed under Alternative B would be slightly smaller than existing designated land uses of minimum lots sizes of 5, 10, 20, 40 and 100 acres in the vicinity of the project site, but the 1-acre resident plots would be clustered so as to retain larger open spaces and preserve the rural character of the Santa Ynez Valley while still being large enough plots such that the clusters do not constitute a suburban subdivision. Land preserved for agricultural uses under Alternative B would be the same as Alternative A (206 acres; refer to **General Response 3.1.9**). Because less acreage would be designated for residential purposes under this alternative, even when including the proposed 30 acres of tribal facilities, more acreage would be preserved for open space and recreational uses than Alternative A and more acreage would therefore be consistent with local zoning and adjacent land uses. Approximately 825 acres would remain undeveloped and used as open space/recreation areas compared to approximately 256 acres proposed under Alternative A.

The tribal facilities proposed under Alternative B have been revised to exclude the banquet/exhibition hall and instead would serve as a tribal meeting area with space to accommodate up to 400 attendees plus vendors as well as administrative offices and support space, similar to that of the existing Tribal Administrative Building on the Reservation (refer to **General Response 3.1.17** for further discussion). The tribal facilities are not consistent with local land use plans or existing land uses, as stated in Section 4.2.8 of the EA. However, as stated in Section 2.3 of the Final EA, the tribal facilities are designed to be consistent with the visual character and distinctive style of the Santa Ynez Valley. In addition, the community facilities would be positioned at the center of the project site, thereby creating a buffer between the facilities and surrounding, off-site residential and agricultural land uses. Further, because the Tribe will also have low density residential development and agricultural land uses on site, it would therefore be in the Tribe's best interest to limit impact of the community facilities on residential and agriculture land use. Lastly, adverse impacts to land use would only result if an incompatible land use would result in the inability of the County to continue to implement existing land use policies; the proposed tribal facilities would not prohibit the County from implementing its existing land use polices in the vicinity of the project site under the County's jurisdiction. Operation of the tribal facilities would

therefore not create a significant adverse impact to local land use plans or existing land uses. The text in Section 4.2.8 of the Final EA was updated for clarification.

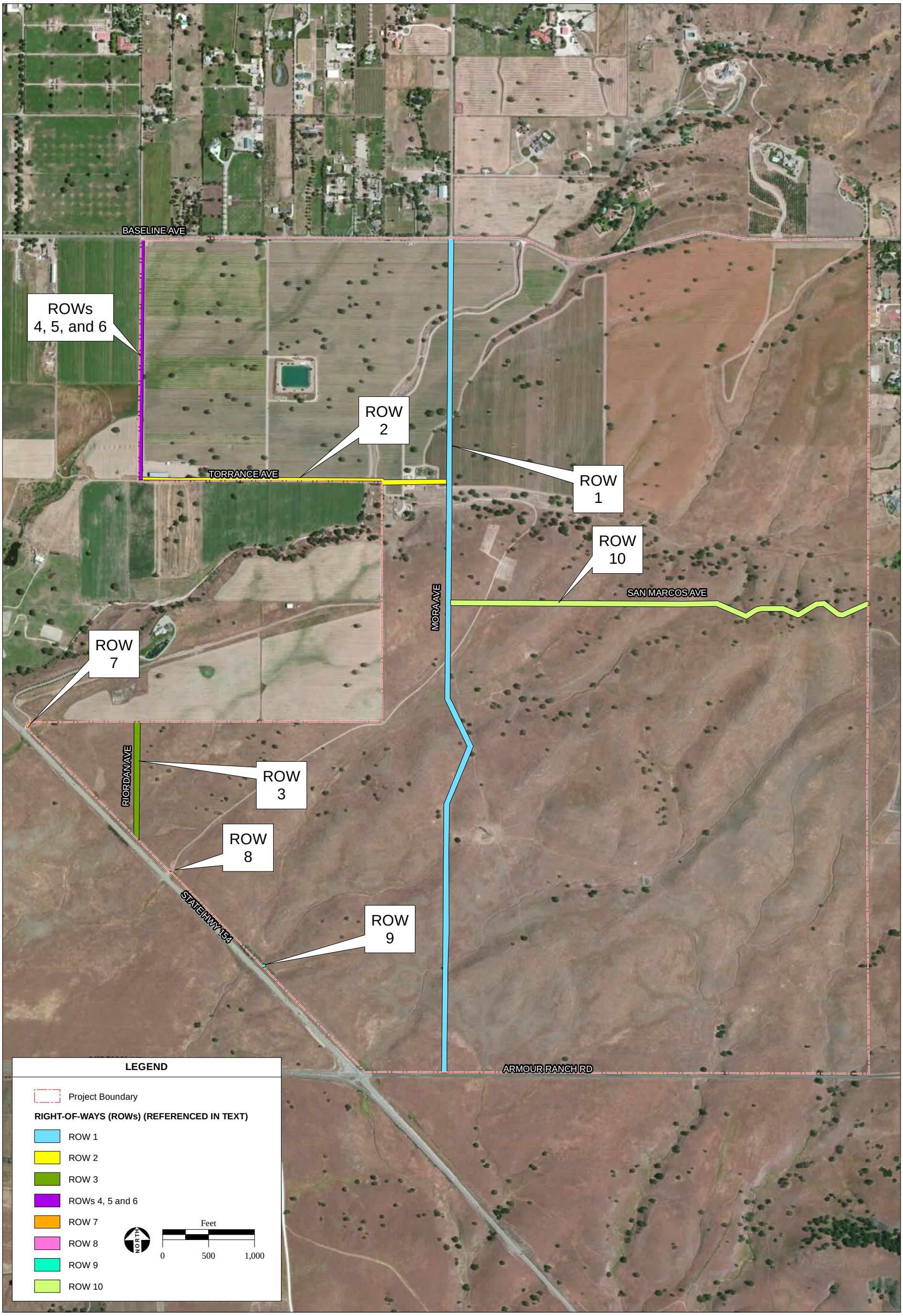
Summary of Comments – Easements and Right-of-Ways

Several commenters expressed concerns related to rights-of-ways (ROWs) within the project site and the TCA. The EA states that the Tribe proposes a trust acquisition of 1,433± acres (1,411.1 acres plus 21.9 acres of ROWs). Comments indicated that further research is needed to determine the owner of the ROWs, and, if it is determined an entity other than the Tribe owns the ROWs, then the 21.9 acres cannot be taken in to trust and/or ROWs on the 21.9 acres must remain in place.

Response

Existing ROWs on the project site are shown in **Figure 3.1-1** and include the following (the numbering corresponds to the labels on **Figure 3.1-1**):

1. A 60-foot wide, approximately 9,190-foot long, north-south ROW located at the center of and extending the north-south length of project site for the planned Mora Avenue;
2. A 60-foot wide, approximately 3,320-foot long, east-west ROW located in the northwestern portion of project site that extends west from the Mora Avenue ROW (number 1 above) to the western boundary of the project site for the planned Torrance Avenue;
3. A 60-foot wide, approximately 1,290-foot long, north-south ROW located in the southwestern portion of the project site that extends north from SR-154 to the northern edge of the project site for the planned Riordan Avenue;
4. A 40-foot wide, approximately 2,580-foot long, north-south ROW located just within the western boundary of the project site that extends south from Baseline Road to the southern boundary of the project site for road ingress, egress, public utilities, and incidental purposes in favor of Williard W. Shepherd and Norma D. Shepherd;
   A 40-foot wide, approximately 2,580-foot long, north-south ROW located just within the western boundary of the project site that extends south from Baseline Road to the southern boundary of the project site for road ingress, egress, public utilities, and incidental purposes in favor of Titus A. Giorgi and wife;
5. A 40-foot wide, approximately 2,580-foot long, north-south ROW located just within the western boundary of the project site that extends south from Baseline Road to the southern boundary of the project site for repair and maintenance of the ROW area;
6. A ROW for a 30.44-foot wide access point located at the northwestern corner of the project site for abutter's rights of ingress and egress to or from SR-154;
7. A ROW located at a point along the southwestern boundary of the project site for a water line, equipment passing, and incidental purposes in favor of Joan Vickers Crawford, Executor of the Will of Anna V. Crawford;
8. A ROW for a 20-foot wide access point located at the northwestern corner of the project site for abutter's rights of ingress and egress to or from SR-154; and



SOURCE: Santa Barbara County GIS Data, 2012; Santa Ynez Band of Chumash Indians, 2011; NAIP Aerial Photograph, 6/17/2009; AES, 2013

Figure 3.1-1
Right-of-Ways

1. A 60-foot wide, approximately 4,770-foot long, east-west ROW located in the northeastern portion of project site that extends east from the Mora Avenue ROW (number 1 above) to the eastern boundary of the project site for the planned San Marcos Avenue; this ROW is noted as abandoned on the ALTA/ACSM Land Title Survey but is not listed in the title report (ALTA, 2013).

The Tribe conducted a review of the title and concluded the above-listed ROWs are easements not dedications; therefore, the Tribe is the owner in fee of the ROWs and the areas can be taken in to trust (L&P Consultants, 2014). If the trust acquisition is approved, the Tribe would honor all ROWs that provide primary access to land-locked parcels (e.g. ROWs 4, 5, and 6 in **Figure 3.1-1**) unless otherwise negotiated. Preservation of other existing ROWs not providing primary access would be assessed on a case by case basis. The purpose of the EA is to analyze the potential environmental impacts resulting from implementation of the proposed alternatives, including impacts related to existing ROWs. Thus, the project site was defined to include these ROWs, and the existing ROWs were therefore considered within the environmental impact analysis of the EA.

3.1.11 Public Services and Utilities

Summary of Comments

Several commenters expressed concerns as to how public services that would be utilized by the proposed alternatives, such as law enforcement and public schools, would be funded if the project site were removed from the County tax base. Additionally, some comments stated that utilities would be disproportionally affected if the project site were removed from the County tax base.

Response

As discussed in Section 4.1.9 and 4.2.9 of the EA, residents of the new housing units would be tribal members who move from existing homes within the County. Employees of the Tribe working at the site would generally be current County residents. Because residents and employees are already being provided with these public services, impacts to law enforcement, public schools, and parks and recreational facilities would not constitute a significant effect. The SBCPD and the Tribe has completed negotiations for law enforcement services on the Reservation, existing trust lands, and parcels currently owned in fee by the Tribe that may be conveyed to trust status within the four-year period (e.g. the project site); text has been added to Section 3.9.5 of the Final EA to reflect this negotiated agreement. Mitigation was included in Section 5.9 of the Final EA to ensure that either 1.) the Tribe would grant permission to the SBCFD to enter the project site after it has been taken into trust, or 2.) the existing agreement between the Tribe and the SBCFD for fire protection services would be updated to include services at the project site and the County would coordinate with the California Department of Forestry and Fire Protection (CAL FIRE) to continue the Cooperative Wildland Fire Management and Stafford Act Response Agreement if the Proposed Action is approved. Additionally, the Tribe included mitigation measures in Section 5.9 of the EA to further reduce the risk of fire during construction, which also further reduces the

impact on fire protection services. The Tribe would develop its own water supply and WWTP as well as coordinate with solid waste, electricity, natural gas, and telecommunications providers to establish services, thereby minimizing any impact.

In addition, as discussed in Section 3.9 of the EA, the County currently receives payments for law enforcement and fire protection services through special agreements with the Tribe. The Special Distribution Fund in the 1999 Tribal-State Gaming Compact provides for law enforcement funding to the County, which has totaled approximately $4.6 million since the 2003-2004 fiscal year. As discussed above, the Tribe and SBCSD negotiated agreement for law enforcement services on tribal lands and lands owned in fee by the Tribe in exchange for the Tribe providing funding for one patrol vehicle and associated equipment, estimated at a one-time cost of $65,000; funding for Full Time Equivalent (FTE) position, at a cost of $840,900 per year; and funding for maintenance on the patrol vehicle, at a cost of $8,231 per year. In addition, the Tribe and Santa Barbara County Fire Department (SBCFD) entered in to an Agreement in 2002 that the Tribe would fund one additional firefighter/ paramedic position in exchange for fire protection services at and around the Chumash Casino Resort. The SBCFD was originally paid under the Agreement, and funding transitioned to payments from the Special Distribution Fund in 2006. To date, the Tribe has paid $1.58 million under the Agreement, and $3 million has been paid by the Special Distribution Fund for fire protection services. In total, just over $9 million has been paid to the County to compensate for law enforcement and fire protection services on tribal lands. Text has been added to Section 3.9 of the Final EA to clarify these payments.

The Tribe has also made substantial donations to public schools and recreational facilities in the Santa Ynez Valley. Examples include a donation from the Tribe's Chumash Foundation of $3 million to the Santa Ynez Valley Union High School for complete renovation of its athletic fields and the Tribe's partnership with the Santa Ynez Valley Youth Recreation to fund the renovation of the tennis courts at Los Olivos Elementary School. Over the years the Tribe has contributed over $4.5 million to Santa Barbara County educational institutions, including $3.1 million to local schools in the Santa Ynez Valley.

3.1.12 Development of Proposed Alternatives

Summary of Comments – Future Plans and Development Would Not Be Regulated

Several commenters expressed concern that future development on the project site would not be regulated by local or regional laws. Commenters stated that there is nothing binding the Tribe to adhere to the plans presented within the EA, thereby creating the potential for future development that may be incompatible with local and/or regional plans. Comments also contended that if State and local authorities no longer have jurisdiction, the goals and purposes of local land use plans and policies cannot be realized affecting the safety of current residents, viability of existing economic enterprises, and organized growth in the region.

Response

If the project site is taken into trust, the Tribe would establish governmental control over the land through Tribal Council decisions as allowed for in the Tribe's constitution. Therefore, any future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe, USEPA, and other federal agencies in accordance with applicable federal regulations such as the Clean Water Act and Clean Air Act. Refer to **General Response 3.1.10** regarding the impacts of development on the project site that is incompatible with local plans and adjacent land uses.

Summary of Comments – Potential for Future Casino on Project Site

Comments were received including questions and concerns regarding the future use of the project site for gaming purposes. Some commenters acknowledged that the EA specifies that no gaming would occur on the project site but requested an analysis of a potential gaming facility on the project site regardless.

Response

The EA evaluates reasonably foreseeable alternatives, which do not include gaming. Gaming is not reasonably foreseeable because the Tribe already owns and operates a casino resort 1.7 miles west of the project site. Hundreds of millions of dollars have been invested in the existing casino resort and associated infrastructure, and it would not be reasonable to expect the Tribe to duplicate this effort and expense for a similar facility 1.7 miles away. The EA states "No gaming would occur on the subject property" under Alternative A (page 2-4) and Alternative B (page 2-12). As explained in Section 2.0 of the EA, Alternative A includes plans for residences, agricultural, open space, resource management zones, and associated utilities. No community facilities are proposed under Alternative A. Alternative B includes all project components of Alternative A and the addition of tribal facilities that include a banquet/exhibition hall, tribal office complex, and tribal community space. The details of the proposed Alternative B tribal facilities are provided in Table 2-2 and do not include square footage for a gaming facility. No development would occur under Alternative C, and therefore no gaming facility would be constructed under Alternative C. No gaming would occur on the subject property regardless of the selected alternative; therefore, no analysis of a gaming facility is warranted in this EA.

Furthermore, the use of newly acquired trust property for gaming purposes must either meet one of the exceptions under the Indian Gaming Regulatory Act (IGRA) Section 20 (25 U.S.C. 2719(a)) or achieve approval under the process identified under 25 U.S.C. 2719(b) (hereinafter "two-part process") which requires approval by the Secretary of the Interior and concurrence by the Governor of the State. Both such processes require further documentation, submissions, and approvals which would be in addition to the current trust acquisition application process. The Tribe would therefore have to submit a full request (and likely additional environmental documents) to the Secretary of the Interior seeking approval under the two-part process. Thus, gaming uses of the property could not be achieved by approval of the trust application but rather further submissions and documentation would be required in a separate process.

3.1.13 Alternatives

Summary of Comments

Several comment letters stated the EA did not evaluate an adequate range of alternatives. Commenters also stated that the alternatives selected for detailed analysis in the EA are not representative of all the concept plans presented in Appendix N of the EA. Additionally, commenters contended that the discussions and details presented of selected alternatives were insufficient.

Response

Refer to **General Response 3.1.3** for a discussion as to how the description of the alternatives in Section 2.1 of the EA provides the necessary level of detail required to assess the potential environmental impacts of each proposed alternative.

The EA and Final EA appropriately consider a reasonable range of alternatives that were determined with a consideration for each alternative's ability to meet the purpose and need (see Section 1.3 of the Final EA). The discussion in Section 2.1 of the EA provides the reasoning as to why some alternatives were not further considered. As stated therein, the only reasonable alternatives are to either take no action or take the requested parcels into trust on behalf of the Tribe to alleviate the existing shortage of developable land and associated housing on the Tribe's Reservation. Other potential alternatives to the Proposed Action, such as a reduction in the number of parcels taken into trust or alternative locations do not meet the definition of "reasonable" under the CEQ Regulations for Implementing NEPA. As shown in the Tribe's various concept plans under consideration for development on the project site (Appendix N of the EA), all requested parcels are integral to meeting the purpose and need, as stated in Section 1.3. To take fewer parcels into trust would not provide acreage for housing assignments; circulation; multiple access and egress points for residential safety; agriculture operations to diversify tribally-governed commercial enterprises; open space, recreation, and conservation in accordance with tribal environmental ordinances; and associated utility infrastructure to support each of the designated land uses. Because the purpose and need would not be met, such an alternative is not considered reasonable and therefore is not evaluated within the EA. There are no other available comparable lands that would provide a sufficient land base to support the proposed land uses to meet the stated purpose and need within the immediate area of the existing Reservation and within the Tribe's ancestral and historic territory. The Tribe reevaluated its selection of alternatives for detailed analysis in the EA and concluded that, regardless of the withdrawal of the TCA (refer to **General Response 3.1.2**), the project site is the only property that would meet the purpose and need of the Proposed Action in the immediate area of the existing Reservation. Placing a housing development on the existing Reservation would not achieve the stated purpose and need as there is not enough undeveloped acreage to provide for residences for current and future generations and rebuilding on the Reservation is extremely difficult because it involves canceling existing land assignments. Therefore, alternative locations for the housing development are not evaluated in the EA.

Additionally, the EA and Final EA appropriately consider alternatives that are representative of all concept plans proposed for the project site. The discussion in Section 2.1 of the EA provides the reasoning as to the selection of alternatives for detailed evaluation within the EA. As stated therein, the Tribe is considering various project alternatives including clustered development plans (Appendix N of the EA). The five-acre concept plan was selected to be evaluated in detail within the EA as Alternative A because it is the only concept plan identifying five-acre assignments and is comparatively different from the remaining eight concept plans. Although eight one-acre concept plans are being considered by the Tribe, based on the similarities in the developments, one layout (Concept Plan Option M.0.1) was selected as the representative layout to be evaluated in detail within the EA as Alternative B. This layout includes the largest distance between assignment clusters and therefore covers a majority of the area that could be developed once a concept plan is approved by the Tribe for development. Inclusion of all eight one-acre concept plans as fully-evaluated alternatives within the EA would result in a high level of redundancy, would not provide the contrast in alternatives as required by the CEQ Regulations for Implementing NEPA, and would not further educate the decision makers as to the environmental impacts of the Proposed Action. Given the similarities in development footprint, density and layout, and project components among the eight one-acre concept plans and that all eight one-acre concept plans are proposed for the same project site, there is minimal potential that implementation of one of the seven other one-acre concept plans not fully evaluated within the EA would result in significant environmental impacts not identified under Alternative B. Therefore, each variation of the one-acre concept plan has not been individually subject to detailed analysis in the EA. In addition, the potential that implementation of the other one-acre concept plans would result in significant environmental impacts not identified under Alternative B is minimal; and therefore each one-acre concept plan does not warrant individual assessments within the EA. The alternatives that were selected to be evaluated in detail allow for contrast in alternatives as required by the CEQ Regulations for Implementing NEPA and further educate the decision makers as to the environmental impacts of the Proposed Action without resulting in redundant analyses.

3.1.14 Visual Resources

Summary of Comments – Lighting and Glare

Several letters commented that the EA fails to analyze the impact of nighttime and outdoor lighting associated with the proposed residential development and banquet/exhibition hall.

Response

The design of the proposed alternatives minimizes the impact of nighttime and outdoor lighting through incorporation of protective measures and BMPs, which are discussed in Section 2.2.10. The impacts of nighttime and outdoor lighting associated with roadways, parking lots, the WWTP facility, and individual residences proposed under Alternative A are analyzed in Section 4.1.12. As stated in Section 4.2.12, Alternative B would involve the construction of a similar residential development of reduced intensity. Therefore, nighttime and outdoor lighting associated with roadways, parking lots, the WWTP facility, and

individual residences proposed under Alternative B would be similar to those proposed under Alternative A. External lighting at the tribal facilities, including the building and parking lot, would be downcast and shielded, in accordance with "dark sky" principals to minimize light pollution, glare, and light trespass. Additional text has been added to Section 4.2.12 of the Final EA to clarify that the impacts of lighting associated with all components of Alternative B would be insignificant.

Summary of Comments – Scenery

Commenters expressed concern that the proposed alternatives may cause significant impacts to visual resources due to the development of 143 residential units and 80,000 square feet of tribal facilities (under Alternative B) on relatively undisturbed, agriculturally-centered lands. Several commenters requested additional information as to how 1-acre lots are similar in visual character to surrounding development if surrounding development is rural residential lots that range from a minimum of 5 acres to a maximum of 20 acres. Commenters stated that the banquet/exhibition hall is not similar to any surrounding development and requested mitigation be included to ensure it will be compatible with the distinctive style of the Santa Ynez Valley.

Response

The 5-acre residential plots proposed under Alternative A would be similar to existing designated land uses in the vicinity of the project site whereas the 1-acre resident plots proposed under Alternative B would be slightly smaller than existing designated land uses of minimum lots sizes of 5, 10, 20, 40 and 100 acres in the vicinity of the project site. However, as discussed in **General Response 3.1.10**, 1-acre resident plots would be clustered so as to retain larger open spaces and preserve the rural character of the Santa Ynez Valley while still being large enough plots such that the clusters do not constitute a suburban subdivision. Additionally, as shown on Figures 2-1 and 2-2 of the EA, an approximately 1,000 foot view corridor of open space would be established along the project site's southwestern boundary with SR-154 under both Alternatives A and B, thereby preserving the scenic views from the roadway. The hilly nature of the terrain along SR-154 is such that none of the proposed residences will be visible from roadway. All residential structures would be designed to be compatible with surrounding residential structures and the rural character of the Santa Ynez Valley; text was added to Sections 2.2 and 2.3 of the Final EA to clarify this.

The tribal facilities proposed under Alternative B would constitute a land use that differs from existing 5-acre (minimum) residential land uses in the vicinity of the project site. The community facilities would be positioned at the center of the project site, creating a buffer between the facilities and surrounding residential and agricultural land uses. Additionally, as discussed in Section 4.2.12 of the EA, the visual character of the development under Alternative B would be compatible with the neighboring East Baseline/Rancho Estates and would be designed similar to that of structures on nearby farms and ranches, thereby keeping consistent with the distinctive style of the Santa Ynez Valley. Mitigation measures to ensure the design is consistent with the style of the Santa Ynez Valley are therefore not necessary. Further, the tribal facilities proposed under Alternative B have been revised to exclude the

banquet/exhibition hall, and therefore constitute an approximately 12,042 square foot (sf) facility as opposed to an 80,000 sf facility (refer to **General Response 3.1.17** for further discussion); the analysis presented in Section 4.2.12 of the EA has been updated accordingly. The level of detail and analysis provided within the Final EA constitutes the required "hard look" at the potential impacts of the Proposed Action and project alternatives to visual resources.

3.1.15 Expressions of Opinion/Non-Substantive Comments

Summary of Comments

Many of the comments received were expressions of opinion either for or against the trust acquisition and subsequent proposed development. Many other comments were received which do not raise a substantive environmental issue. Several other comments were statements of information related to the commenter, such as a mailing address.

Response

To warrant a detailed response in the Final EA, comments must fulfill two minimum requirements: 1) the comments must raise a substantive environmental issue, and 2) they must be related to either the decisions to be made by the Lead Agency based on the EA or to the expected result of these decisions. Responses have not been provided to comments failing to raise substantive environmental issues; however, all comments are in the administrative record for the project and will be considered by the BIA in making its decision.

3.1.16 Impact to Oak Trees and Oak Habitat

Summary of Comments

Several of the comments received expressed concern related to the impact to oak trees and oak habitat. Commenters requested additional information as to how no net loss of oaks would be achieved as well as expressed concerns related to habitat fragmentation, removal of understory, disruption of the canopy, and disruption of animal movement through the woodland.

Response

The Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians (Oak Tree Ordinance) protects species of oak tree native to the County including Valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), and canyon live oak (*Quercus chrysolepis*) but does not include blue oak (*Quercus douglasii*). Blue oak would be protected at a level consistent with the Tribal Oak Tree Ordinance if the Proposed Action is approved; text was updated in Section 3.4, 4.1.4, 4.2.4, and 5.4 of the Final EA to provide clarity. The Tribal Oak Tree Ordinance requires that there shall be "no net loss of oak trees from the Reservation unless they pose a threat to human health or impede development of tribal facilities."

Similar to the tree ordinance which applies to County projects, Section 5.4 of the EA states that the location of specific trees anticipated for removal as part of a project will be identified prior to groundbreaking. Under the selected project alternative, identification of trees which cannot be avoided will be performed by the site contractor. A qualified arborist with experience working with biological resources will survey trees which have been slated for removal by the contractor, identify the specific location, species, size, and health of those trees within the construction footprint, and prepare an Arborist Report describing findings and recommendations. All oak trees anticipated for removal will be assessed and replaced. No net loss of oak trees will occur.

The Arborist Report will provide a revegetation plan which will include proposed planting locations and a five-year plan to ensure successful oak tree replacement. As outlined in Section 5.4 of the EA, specific actions both to preserve existing trees and to encourage recruitment and growth of young trees would be required to offset potential impacts associated with proposed development under Alternatives A and B. In response to comments, the Tribe updated the mitigation measure in Section 5.4.1 of the Final EA to incorporate some of the recommendations from commenters related to replacement oak tree plantings:

> Once the construction footprint is finalized, the contractor shall flag any oak trees slated for removal prior to groundbreaking. A qualified arborist shall survey trees anticipated for removal, identify any oak trees within the selected footprint, and prepare an Arborist Report. The Arborist Report shall identify all oak trees anticipated for removal and require a no net loss of oak trees. The Arborist Report shall provide a revegetation plan that includes proposed planting locations within the project site with a minimum spacing of 20 feet, protection within the dripline of newly planted trees, and a five-year monitoring plan to ensure that the revegetation effort is successful.

As part of the oak tree mitigation program (refer to Section 5.4 of the EA), much of the oak replacement would focus on the riparian corridor and surrounding microhabitats. This process would encourage the recruitment of new trees and would include monitoring to ensure survival, thereby encouraging the establishment of younger trees. To protect oak trees, ground disturbance in these areas would be limited within the dripline of any oak tree in this zone and hand tools would be used whenever feasible to minimize ground disturbance. The oak tree mitigation program would outline provisions that aim to improve the quality of and propagate the habitat available.

Placement of a portion of the new oak trees along the existing riparian corridor would increase habitat complexity and contribute beneficial features including control of stream bank erosion, increased shade, and increased connectivity between existing patches of riparian habitat. Riparian corridors are generally focused movement areas for wildlife relative to upland habitat due to increased forage associated with proximity to water. By planting a significant portion of replacement trees in the on-site riparian habitat, the beneficial effect upon wildlife by new plantings will be maximized. The Arborist Report will also detail the number and placement of additional oaks so that plantings will contribute to reducing runoff.

Understory vegetation has been described in Section 3.4 of the EA as being similar in composition to surrounding non-native annual grassland. Non-native grassland covers a significant portion of the property. During several vegetation surveys performed by qualified botanists within the suitable identification period, it was determined that the project site does not provide habitat for any federally-listed plants. With installation of replacement trees, the type and quantity of which will be determined within the Arborist Report, effects of tree removal on understory vegetation will be reduced to a minimal level.

Establishment of 33 acres of Oak Woodland Resource Management Zone will ensure that large patches of oak woodland are preserved. In these areas, pruning will be closely monitored for the purpose of public safety and tree health. Trimming or other disturbance associated with vegetation management will be limited within the drip line of any oak tree within these designated resource management zones.

Plantings required by the Arborist Report will be subjected to a 5-year monitoring plan to ensure the re-vegetation effort is successful based on provisions outlined and approved in that Report.

3.1.17 Impacts of Alternative B – Tribal Facilities

Summary of Comments

Several of the comments received stated that the EA did not address impacts associated with the tribal facilities included in Alternative B.

Response

Impacts associated with the development of the tribal facilities included within Alternative B are addressed in Section 4.2 of the EA. For example, Section 4.2.7 of the EA addresses impacts to transportation and circulation from Alternative B, including trips generated by the tribal development. Table 4-13 in Section 4.2.7 of the EA provides the estimated number of peak hour trips generated by Alternative B, and the tribal facilities are clearly represented through the incorporation of a trip generation rate identified as "Community Center." The Tribe has revised the program for the tribal facilities as the development of a banquet/exhibition hall is no longer economically feasible. Instead, the Tribe would develop approximately 12,000 square feet of tribal facilities nearly identical to the facilities on the existing Reservation. The tribal facilities would include a meeting hall, private offices, general office space, conference room, break room and kitchen, and associated circulation and miscellaneous spaces (lobby, bathrooms, reception, storage, etc). A breakdown of the components of the proposed tribal facilities is displayed in Table 2-2 in Section 2.3 of the Final EA. It is anticipated that the tribal development would include office space for up to 40 tribal employees and result in up to 100 events per year being held at the facilities with up to 400 attendees plus vendors. The analysis of impacts within the Final EA has been updated to account for the reduction in size of the facilities and intensity of anticipated use. For example, the TIS has been updated to account for the lower number of trips that would be

generated by the smaller facilities (refer to Appendix I of the Final EA). To accommodate the reduced intensity of the development, approximately 250 parking spaces would be provided.

3.1.18 Impacts of Alternative C

Summary of Comments

Several commenters stated that the No Action Alternative (Alternative C) was inaccurate because it assumed no development would occur on the property. Comments contended that the project site could be developed consistent with existing zoning laws.

Response

The Tribe reevaluated its options and decided that, if the Proposed Action is not approved, the Tribe would likely increase vineyard production to maximize the use of the prime farmland on the project site that would continue to be held under fee title and governed by County land use restrictions. The No Action Alternative (Alternative C) has been updated in the Final EA to include development of approximately 44 acres of vineyard (refer to Section 2.4 of the Final EA). The Tribe may keep all parcels of the project site under Williamson Act contracts under the No Action Alternative.

3.2 INDIVIDUAL RESPONSES

This section provides direct responses to individual comments received from public agencies, governmental bodies, organizations, as well as private citizens during the comment period. All of the comments, which have been bracketed and numbered for ease of reference, are provided in **Section 2.0** of this document.

3.2.1 Federal Comment Letters (F)

No comment letters were received from federal agencies.

3.2.2 State Comment Letters (S)

Response to Comment Letter S1 – California Department of Transportation, District 5

S1-01 The Traffic Impact Study (TIS) (Appendix I to the Final EA) applied the Caltrans LOS D significant criteria for SR-154 and SR-246 as found in the *Caltrans Transportation Concept Report*. This approach is the same used, and therefore consistent with, the County's traffic analysis prepared for the Santa Ynez Valley Community Plan (SYVCP). The traffic study prepared for the SYVCP was reviewed by Caltrans staff, and LOS C was not specified by Caltrans as the applicable significance criteria. The Santa Barbara County Congestion Management Program adopted by the Santa Barbara County Association of Governments uses LOS D as the standard for SR-154 and SR-246. Accordingly, a LOS D was used as significance criteria to determine adverse traffic impacts to State highway facilities.

The commenter suggests using LOS C as the standard for SR-154 and SR-246, stating, "The current minimum standard for all state highways is LOS C, as outlined in the *Caltrans Guide for the Preparation of Traffic Impact Studies* [*Caltrans Guide*]." Caltrans published the *Caltrans Guide* to provide "better quality and consistency in the analysis of traffic impacts generated by local development and land use change proposals that effect State highway facilities" (Caltrans, 2002). The *Caltrans Guide* was developed by Caltrans staff and then adapted for State-wide use by a team of Headquarters and District staff; however, the LOS C reference in the *Caltrans Guide* is not an LOS standard or significance criteria that has been adopted pursuant to CEQA or NEPA requirements. Accordingly, a LOS C was not used to evaluate the impacts of Alternatives A and B to State highway facilities.

Additionally, the *Caltrans Guide* states "Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained" (Caltrans, 2002). As shown in the TIS, most of the study-area roadway segments and intersections are forecast to operate at LOS C or better with the addition of project traffic in the near-term. For those study-area State highway facilities and intersections that are forecast to operate at LOS D or worse, the existing LOS would not be degraded by Alternatives A and B in most cases (refer to Tables 3.7-3 through 3.7-5 in Section 3.7, Tables 4-5 through 4-7 of Section 4.1.7, and Tables 4-14 through 4-16 of Section 4.2.7 in the Final EA). The SR-246/SR-154 intersection currently operates at LOS C but would degrade to LOS F with the addition of project traffic in the near-term, which is a significant impact. The mitigation recommended in Section 5.7 of the EA is to signalize or convert the intersection to a roundabout. A roundabout project is now under construction and scheduled for completion in 2015, which will mitigate the impact generated by Alternatives A and B. In the cumulative scenario, several of the study-area State highway facilities and intersections are forecast to operate at worse than LOS D (refer to Tables 4-23 through 4-28 of Section 4.4.7 in the Final EA); mitigation included in Section 5.7 of the EA would provide fair share funding from the Tribe for recommended traffic improvements that would reduce the impact of Alternatives A and B to minimal level.

S1-02 The commenter is incorrect in stating, "A Peak Hour Factor (PHF) of 1.00 was used for all traffic analysis in this traffic study." The TIS applied a PHF of 0.88 for the roadway segment analyses prepared for SR-154 north and south of the SR-246 connection. For intersections, the traffic study applied a PHF of 1.0, which is consistent with the traffic analysis prepared by the County for the SYVCP.

The comment includes several definitions and descriptions of volumes and flow rates from the Highway Capacity Manual (HCM). However, application of PHFs that are less than 1.0 is not required by the HCM. Use of PHFs less than one are intended to evaluate traffic operations for the busiest 15-minute period within the peak one-hour period, instead of analyzing the one-hour peak period. Both the County and SBCAG have adopted LOS standards for the one-hour peak period (i.e. PHFs = 1.0). Therefore, the intersection analysis contained in the TIS and EA for Alternatives A and B is consistent with the standards adopted by the County and SBCAG. Furthermore, the analysis contained in the TIS and EA is consistent with that used in the traffic study developed by the County for the SYVCP.

S1-03 The LOS analysis for the unsignalized intersections provided in the TIS prepared for Alternatives A and B is consistent with the analysis used by the County for unsignalized intersections in the traffic study prepared for the SYVCP (Appendix I of the Final EA). Caltrans is correct in stating that the HCM does not provide procedures for determining the overall LOS for unsignalized intersections. However, the traffic analysis for the unsignalized intersections provided in the TIS does not "*violate HCM methodology*," as stated by the commenter. Instead, the LOS reported in the TIS use a weighted average of the delays for vehicles that are required to stop and wait for a gap prior to traversing the intersection (major road left-turn movements and minor street left-turn, thru, and right-turn movements). This method was developed by Associate Transportation Engineers (ATE) and the County evaluating LOS at unsignalized intersections within the County.

S1-04 Comment noted. Refer to the response to **Comment S1-01** for a discussion of the LOS criteria used to determine significant impacts to intersections.

Response to Comment Letter S2 – California Department of Fish and Wildlife, South Coast Region

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely correspondence between the BIA and commenter regarding the end of the comment period on the EA.

Response to Comment Letter S3 – California State Clearinghouse

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely correspondence from the commenter regarding comment letters received at the State Clearinghouse during the comment period on the EA.

Response to Comment Letter S4 – California Department of Fish and Wildlife, South Coast Region

S4-01 Comment noted, and the comment letter and attachments are hereby incorporated into the administrative record. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

S4-02 and **S4-03** Comment noted.

S4-04 Comment noted. Refer to **General Response 3.1.16** for a discussion of the Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians (Oak Tree Ordinance) and actions that would be taken by the Tribe to ensure no net loss of oak trees on the project site.

S4-05 Comment noted. Sections 3.4 and 5.4 of the Final EA have been updated to reflect a raptor nesting season of February 1 through September 15.

S4-06 The project site is bound by roads on its north and south borders. Currently developed land uses in the vicinity of the project site include residential development to the north and east. Agricultural crops are located to the north, east, and west. Oak savannah is located to the west and south, and non-native annual grassland can be found to the southeast, south, and southwest of the project site. The ephemeral drainage that extends in a southwestern direction through the vineyard is comprised of highly incised three and ten-foot high banks with shrubby upland vegetation present, which provides cover and a link to other habitats located to the north and southwest of the project site. Appropriate buffer zones will be established surrounding each ephemeral drainage identified on the property as described in Section 5.4 of the Final EA. These buffers will restrict construction activities so that no equipment storage, grading, or structural development will occur within the identified corridor. Alternatives A and B have both been designed to avoid the identified wildlife corridor and its associated migratory value. Planting of replacement oak trees, as described in **General Response 3.1.16**, will improve the habitat resources available within the corridor by increasing beneficial effects associated with habitat diversification. Enhancement of the wildlife corridor will improve the linkage between. No habitats associated with native or resident migratory fish or wildlife nursery habitats are found on the project site.

Edge effects that may result from implementation of Alternatives A and B would either result in a minimal impact due to the project design (e.g. maximizing the size of resource management zones) or would be mitigated to a minimal impact (e.g. development of a spill prevention and countermeasure plan for construction, as required by mitigation in Section 5.11).

The Tribe will consider factors that would maximize animal wildlife corridors, such as placement, size, and links between resource management zones, when developing the final site plan of the selected project alternative. In particular, the designated open space/recreational such as Passive Trails and an Equestrian Area create a transition between residential and riparian areas in many portions of the property (EA **Figures 2-1** and **2-2**).

As stated in Section 2.2 of the EA, structural fire protection would be provided through compliance with tribal ordinances no less stringent than applicable International Fire Code requirements. During development of the final site plan of the selected project alternative, the Tribe will consider the location of proposed structures location and roadways as they relate to fuel modification zones and consult with the SBCFD as needed. Hand tools for fuel modification activities will be utilized where feasible.

The Tribe will consider invasive species, including ants, when designing the project site landscaping plan. The analysis within the EA is consistent with the CEQ Regulations for Implementing NEPA, the BIA NEPA Guidebook, and the FESA.

S4-07 Comment noted.

S4-08 Comment noted. The Tribe will retain open space wherever feasible in accordance with its commitment to conservation. Maintenance of riparian corridors, including implementation of buffers, management of invasive vegetation, and encouragement of oak woodland establishment will act to ensure protection/enhancement of habitat and existing migratory corridors. It is appreciated that the commenter will be available for future consultation.

S4-09 Comment noted. It is appreciated that the commenter will be available for future consultation. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter S5 – California Native American Heritage Commission

S5-01 Comment noted.

S5-02 Comment noted.

S5-03 Comment noted. For comments related to contacting the commenter, refer to **General Response 3.1.15**.

Response to Comment Letter S6 – California Native American Heritage Commission

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter S5. Refer to **Response to Comment Letter S5**.

Response to Comment Letter S7 – California State Clearinghouse

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely correspondence from the commenter regarding comment letters received at the State Clearinghouse during the comment period on the EA.

Response to Comment Letter S8 – California State Clearinghouse

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely correspondence from the commenter regarding comment letters received at the State Clearinghouse during the comment period on the EA.

3.2.3 Local Comment Letters (L)

Response to Comment Letter L1 – Santa Barbara County Executive Officer Chandra L. Wallar

L1-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

L1-02 Comments noted.

L1-03 The commenter is correct that acreage of the project site (approximately 1,433 acres) accounts for approximately six percent of the rural lands identified in the Santa Ynez Valley Community Plan (SYVCP) area (approximately 22,690 acres), which could be considered a substantial amount. However, the majority of the project site would remain rural. As stated in Appendix D to the EA, the development footprint of residences and new roadways would be approximately 43 acres under Alternative A and approximately 57 acres under Alternative B. Including the 3 acres for utilities, the total conversion from rural land on the project site would be approximately 46 and 60 acres for Alternatives A and B, respectively. These acreages represent approximately less than one percent of the rural lands identified in the SYVCP area.

L1-04 Comment noted. Land use is adequately addressed in Sections 3.8, 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA.

L1-05 Refer to **General Response 3.1.8** regarding requests to review the cultural resources appendix of the EA (Appendix F of the EA).

Response to Comment Letter L2 – Cathy Christian, Attorney for Santa Barbara County

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely a request from the commenter to receive notice of any

information regarding the EA, the associated NEPA process, the associated fee-to-trust application, and the TCA.

Response to Comment Letter L3 – Santa Barbara County Executive Officer Chandra L. Wallar

L3-01 Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L3-02 Refer to **General Response 3.1.3** for further discussion as to why an EIS is not required. The commenter cites the case of *Natural Resources Defense Council v. Duvall*, 777 F. Supp. 1533 (E.D. Cal. 1991) to support the comment that the Tribe's EA is inadequate because there are "substantial questions as to whether Camp 4 may cause significant environmental impacts." The referenced case does not support the proposition that a third party's questions can trigger a requirement to prepare an EIS. Instead, the case states that "only in those obvious circumstances where no effect on the environment is possible, will an EA be sufficient for the environmental review required under NEPA" (*Natural Resources Defense Council v. Duvall*, 777 F. Supp. 1533 (E.D. Cal. 1991)). However, this is an older case in which the court held that the EA in that case failed the test of "reasonableness" (*Natural Resources Defense Council v. Duvall*, 777 F. Supp. 1533, 1539 (E.D. Cal. 1991)). Recent cases have identified more objective criteria, such as the intensity of the environmental effects and context, for determining if an EA is sufficient (e.g. *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846 (9th Cir. 2005); *Ctr. for Envtl. Law & Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1007-1011 (9th Cir. 2011); *Rohnert Park Citizens to Enforce CEQA v. U.S. Dept. of Transportation*, 2009 WL 595384 (N.D. Cal. Mar. 5, 2009)). The commenter cannot simply state that there are "substantial questions" to require an EIS; it must show that the project may cause significant effects. As demonstrated in *Ocean Advocates v. U.S. Army Corps of Engineers*, 402 F.3d 846, 864–865 (9th Cir. 2005), an EIS was required for a dock extension because Ocean Advocates showed an increasing market demand for use of the dock over time.

Finally, there are no significant environmental impacts from the Proposed Action and project alternatives after mitigation. The EA addresses all required impacts in Section 4.0; as Section 2.2.10 of the EA further states, protective measures and BMPs have been incorporated into the project design to eliminate or substantially reduce environmental impacts.

L3-03 Refer to **General Response 3.1.1** regarding extension of the comment review period equal to the length of the government shutdown.

L3-04 Refer to the response to **Comment L3-02** regarding the case cited by the County to support its claim that the BIA should prepare an EIS for the Proposed Action and project alternatives.

L3-05 Comment noted. Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe.

L3-06 Comment noted.

L3-07 Comment noted. Refer to **General Response 3.1.1** regarding the extended comment period.

L3-08 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L3-09 The commenter states that the Proposed Action and project alternatives may have a significant environmental impact on land use, agriculture, public services including fire and sheriff, water resources, biology, air quality, traffic, and visual resources. The existing settings of these resources are assessed in Section 3.0 of the EA, and the corresponding environmental impacts to these resources from the implementation of the project alternatives are assessed in Section 4.0 of the EA. As stated therein, impacts to these resources would be minimized with the incorporation of mitigation or through project design; no significant adverse impacts would occur as a result of the Proposed Action and project alternatives.

The commenter further states that the project alternatives are inconsistent with land use regulations, including: the Santa Barbara County Comprehensive Plan, SYVCP, the Williamson Act, County Uniform Rules, County zoning ordinance, and County Codes including Agricultural Buffer and Grading; refer to **General Response 3.1.10**. The Tribe is planning to continue to operation of approximately 200 acres of the existing vineyard under Alternatives A and B, as discussed in Sections 2.2 and 2.3 of the Final EA (refer to **General Response 3.1.9**). As discussed in Section 4.1.8 of the EA, all parcels of the project site are under Williamson Act contracts. The Tribe has submitted a notice of non-renewal for the Williamson Act contracts (Appendix L to the EA). In addition, the Tribe passed Resolution 931 dated July 1, 2013 which requires compliance with the provisions of the existing Williamson Act contracts and the associated non-renewal process until the contracts expire in 2023.

Refer to **General Response 3.1.11** regarding removal of the project site from the County tax base and impacts to public services and utilities.

The commenter states than an EIS is required to disclose all project components and correct factual errors, to establish a clear and accurate baseline, to evaluate a full range of alternatives, and to disclose and analyze the reasonably foreseeable uses of Camp 4. The comment further states that the project description is inadequate because it fails to disclose components of the project that are vital to evaluating the impacts and what is reasonably

foreseeable. An EIS is not required for such disclosure and analysis as the EA provides this information; refer to **General Response 3.1.3**.

The commenter also states than an EIS is required to analyze all potentially significant direct and cumulative impacts and to require measures to mitigate or avoid significant impacts. An EIS is not required for such disclosure and analysis, as the EA provides the same analysis. The EA includes a comprehensive description and sufficient analysis in Section 4.0 of the foreseeable consequences of the trust acquisition, the tribal residential development, and the additional proposed land uses and supportive development to provide the BIA with a "hard look" at the potential environmental effects of the Proposed Action and project alternatives. With incorporation of the protective measures and BMPs discussed in Section 2.2.10 and 2.3.1 of the EA and the mitigation measures presented in Section 5.0 of the EA, environmental impacts of the Proposed Action and project alternatives would be reduced to minimum levels. The commenter cites *Center for Environmental Law and Policy v US Bureau of Reclamation* (655 F.3d 1000 (9th Cir. 2011)) and argues that "Agencies conducting NEPA review must also consider the indirect effects of the proposed project—i.e.[,] effects caused by the agency action that are later in time or farther removed in distances, but are still reasonably foreseeable." But where "an action 'could conceivably' occur but 'it is at least as likely that it will never' occur, the 'future activity is not reasonably foreseeable,' (refer to, e.g., *Building a Better Bellevue v. U.S. Dept. of Transportation*, 2013 WL 865843 at *6 (W.D. Wash. Mar. 7, 2013) ("[W]hen) (quoting *Headwaters, Inc. v. Bureau of Land Mgmt*., 914 F.2d 1174, 1182 (9th Cir. 1990)) and need not be considered. Here, the EA thoroughly discusses indirect and reasonably foreseeable environmental effects in Section 4.0. In *Center for Environmental Law*, the EA in question was deemed adequate because the EA discussed cumulative effects. The court also held that the EA did not need to include discussion of impacts of a future project (*Ctr. for Envtl. Law & Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1007-1011 (9th Cir. 2011)). Although the discussion of past cumulative effects was "perfunctory," the court held that the rest of the EA in question displayed Reclamation's sensitivity to those effects:

> The perfunctory discussion in the "Cumulative Impacts" section of the EA is not, however, reflective of Reclamation's overall approach. The analysis of various effects in other portions of the EA displays sensitivity to, and consideration of, the multitude of changes previously wrought by mankind on the Columbia River Basin (*Ctr. for Envtl. Law & Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1007-1011 (9th Cir. 2011)).

Table 4-17 in Section 4.4 of the EA expressly presents a summary of the approved and pending development projects in the Santa Ynez Valley, and Section 4.4 of the EA discusses potential cumulative impacts, easily meeting the standard applied in *Center for*

Environmental Law. Finally, the court further stated that although another project was reasonably foreseeable—since the government had issued a Notice of Intent to conduct the project—the impact of that project would be addressed in the NEPA review for that project (*Ctr. for Envtl. Law & Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1007-1011 (9th Cir. 2011)). Since the completion of the EA, the Tribe has proposed a hotel expansion project on the existing Reservation. Section 4.4 of the Final EA has been updated to include the cumulative impacts associated with the Tribe's proposed expansion of the hotel.

L3-10 Refer to **General Response 3.1.10** regarding the existing Right-of-Ways (ROWs) on the project site.

L3-11 As stated in Section 2.2.2 of the EA, the residential units proposed under Alternative A would be single-family detached houses. Residential units proposed under Alternative B would also be single-family detached houses; text was added to Section 2.3 of the Final EA for clarification. Accessory structures on the residential lots would be typical of those associated with single-family, rural residences. If the Proposed Action is approved and the project site is taken into trust, rules and regulations associated with allowable structures and permitted land uses on residential lots would be at the discretion of the Tribe (refer to **General Response 3.1.12** for further discussion).

The EA is a planning level document. Consequently, the exact details of the type, number, timing, and size of events to be hosted at the banquet/exhibition hall proposed in the EA have not yet been determined. As stated in Section 2.3 of the EA, it is anticipated that the banquet/exhibition hall would result in up to 100 events per year, a highly conservative number (approximately two events per week). The actual number of events and number of attendees would likely be less. Environmental impacts associated with the banquet/exhibition hall are assessed in Section 4.2 of the EA using the conservative assumption of hosting up to 100 events per year with up to 1,000 people in attendance at each event. For example, the proposed trip generation rate for peak hour trips of the tribal facilities presented in Table 4-13 in Section 4.2.7 of the EA conservatively estimated that all 80,000 square feet of development would add new trips to the study roadway network simultaneously during peak hours (refer to Appendix I of the EA). This assessment provides a worst-case impact assessment scenario. The tribal development trips were estimated using the trip generation rate for land use category 495 Recreational Community Center published in the ITE *Trip Generation* Manual for all 80,000 square feet of development. Utilization of ITE and use category 495 provides a conservative assessment of the entire development (use of office ITE rates for some of the spaces would result in a lower overall trip generation rate). To produce a conservative estimate of water supply and wastewater treatment needs, the Water and Wastewater Feasibility Study (Appendix C of the EA) assumed 100 events per year with 1,000 people in attendance at each event. As with the traffic analysis, the actual number of

events and attendees will likely be less. Accordingly, the comprehensive description provided in Section 2.0 of the EA provides adequate detail for the BIA to fully evaluate the potential impacts of the Proposed Action and proposed alternatives.

Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall. The Final EA and associated technical studies have been updated accordingly; refer to **General Response 3.1.17** for further discussion.

L3-12 Baseline conditions are presented in Section 3.0 of the EA. In regards to population and housing, the baseline accurately presents data from the U.S. Census. Refer to Table 3.6-1 of the EA for the population data and Section 3.6.1 of the EA for a discussion of housing inventory in the project region. These population estimates and housing inventories are utilized in Section 4.0 of the EA to assess impacts of the project alternatives. For example, Section 4.1.6 of the EA assesses the impacts of Alternative A to socioeconomic conditions and clearly outlines the corresponding analysis methodology. As stated therein, an adverse impact to socioeconomic conditions would result from the implementation of Alternative A if the project alternative would result in:

- The substantial alteration of the ability of the local economy to perform at existing levels, from the effects of substantial losses to businesses (for example revenues or employees) or governments (for example tax revenues);
- The displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- The displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The commenter states that the document assumes that there will be no increase in residents of the Santa Ynez Valley. On the contrary, Section 4.1.6 of the EA states that there will be an increase in residents associated with Alternatives A and B; however, the population and demographics of the region would not change "in a substantial way." Furthermore, the analysis states that additional indirect growth would result as people move into the area for construction work or to staff the jobs created indirectly from Alternative A; however, the growth would be minor. Conservatively assuming that all of the 143 new tribal residences would be constructed at once and filled immediately by tribal members residing in the surrounding area and assuming 2.9 persons per household, approximately 415 new residents could move into the region from the homes vacated by tribal members. Based on the population of the region (Santa Ynez, Solvang, Los Olivos, and Buelton), 415 new residents would account for a 2.6 percent increase over the 2010 combined census population of the region. Considering that the project would be constructed in phases as each residence is

needed, such an increase would not occur all at once. The phased growth would not be considered substantial. Therefore, the baseline assumptions are accurate within the EA and the assessment of population growth and number of visitors to the tribal facilities under Alternative B (e.g., refer to Section 4.2.7 of the EA for an analysis of the traffic impacts of the tribal facilities), do not require revisions to the traffic, air quality, or public services analyses presented in Section 4.0 of the Final EA.

L3-13 For comments related to the requirement for an EIS, refer to **General Response 3.1.3**.

The County relies on *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989) for the rule that "NEPA requires the BIA to take a 'hard look' at the environmental consequences of Camp 4." This case so holds, and the BIA did take a "hard look" at the impacts of the Proposed Action.

The County relies on *Natural Resources Defense Council v. Duvall*, 777 F. Supp. 1533, 1539 (E.D. Cal. 1991) for the rule that "An Environmental Assessment in [sic] only appropriate 'in those obvious circumstances where no effect on the environment is possible'" (*Natural Resources Defense Council v. Duvall*, 777 F. Supp. 1533, 1539 (E.D. Cal. 1991)). Refer to the response to **Comment L3-02** regarding the applicability of this case.

The commenter cites *Greenpeace Action v. Franklin*, 14 F.3d 1324 (9th Cir. 1992) and *Blue Mountain Biodiversity Project v. Blackwood*, 161 F.3d 1208 (9th Cir. 1998) as support for the comment that "NEPA requires the BIA to prepare an Environmental Impact Statement because there are substantial questions about whether Camp 4 may have a significant effect on the environment." *Greenpeace*, however, does not support an argument that "substantial questions" about a project that "may" have an effect on the environment triggers the requirement to prepare an EIS. In *Greenpeace*, the court stated that the issue is not the presence of uncertain effects on the human environment, but whether the mitigation measures allowed the reasonable conclusion that there was an adequate buffer against the environmental impact:

> The issue, then, is not whether the uncertainty surrounding the effect of pollock depletions on the Steller sea lion mandated the preparation of an EIS. It is whether, assuming that pollock depletion has had an adverse impact, the 1991 TAC in combination with the mitigation measures formed such an adequate buffer against that depletion that any possible depletion would be too minor to warrant an impact statement (*Greenpeace Action v. Franklin*, 14 F.3d 1324 (9th Cir. 1992)).

This case therefore confirms that the commenter's mere assertion that there are "substantial questions" is insufficient to trigger an EIS.

Blue Mountain likewise stands for the proposition that a third party, such as the commenter, cannot trigger an EIS by simply posing questions. The case states: "As a preliminary step, an agency may prepare an EA to decide whether the environmental impact of a proposed action is significant enough to warrant preparation of an EIS" (*Blue Mountain Biodiversity Project v. Blackwood*, 161 F.3d 1208 (9th Cir. 1998)).

L3-14 Existing agricultural resources, including existing grazing operations, are discussed in Section 3.8.1 of the EA. Impacts to agricultural resources are analyzed in Section 4.1.8, 4.2.8 and 4.3.8 of the EA, and cumulative impacts of Alternatives A and B are discussed in Section 4.4.8 of the EA. Consistent with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, the impact analysis considered potential impacts to the resource of agricultural land, including the impact to livestock, crops, prime and unique farmland, and land use patterns. Specific to existing grazing activities on the project site, implementation of Alternatives A or B would remove less than 0.1 percent of the grazing land within the County, as discussed in Sections 4.1.8 and 4.2.8 of the EA. Livestock and other animals that are currently grazed within the footprint of the proposed housing development would be relocated to other grazing land. Further, the open space retained on Parcels 1, 2, 3, and 5 in Alternative A and on Parcels 2 through 5 in Alternative B would be available for grazing operations; text was added to Section 4.1.8 of the Final EA to correct inconsistencies in statements. The fact that the existing grazing activities on the project site would cease or be significantly reduced in scale does not constitute an impact to an agricultural resource under NEPA. The Tribe would maintain approximately 80 percent of existing vineyard operations on the project site with implementation of Alternatives A or B (refer to **General Response 3.1.9**).

L3-15 Refer to **General Response 3.1.10** regarding applicable land use policies.

L3-16 Construction of the selected project alternative would begin in 2023 at the earliest to comply with the Williamson Act contracts for the project site and Tribal Resolution 931 dated July 1, 2013, unless the contracts are terminated at an earlier date. For the purpose of evaluating impacts to other resources (e.g. air quality, land use) in the EA, the construction date was assumed to be 2014 to apply conservative assumptions. For example, air quality modeling assumes vehicle emission rates reduce over time; accordingly a vehicle emissions factor for 2023 is lower than those used in the 2014 analysis. The cumulative environment in Section 4.4 of the EA assesses impacts to the region under the 2030 planning horizon, which assumes full build-out of the project alternatives. This is an accurate assumption given that the Tribe would then have seven years to develop the residential units before the 2030 planning horizon. Text was added to Section 2.2.9 of the Final EA for clarification.

L3-17 Refer to **General Response 3.1.10** regarding land use on the project site.

L3-18 Agricultural resources are listed under the general headings of Living Resources and Resource Use Patterns and are not listed under the general heading of Land Resources in the BIA NEPA Guidebook. The EA was organized to be consistent with the organizational structure presented in the BIA NEPA Guidebook; therefore, agricultural resources are considered under the resource heading of Land Use in the EA (Sections 3.8, 4.1.8, 4.2.8, 4.3.8, 4.4.8, and 5.8). As in Section 4.1.8 of the EA, impacts to land use resources, which were defined in Section 3.8 of the EA to include agricultural resources, would occur if implementation of the project alternatives would result in the inability of the County to continue to implement existing land use policies or would result in the conversion of a significant percentage of County designated prime agricultural lands or other protected agricultural lands. Therefore, the EA considered land use policies as well as the type of agricultural lands proposed for development when evaluating impacts to on-site and off-site agricultural resources.

As discussed in Section 4.1.8 of the EA, implementation of Alternative A would impact approximately 3 acres of unique farmland, 76 acres of farmland of local importance, and 704 acres of grazing land on the project site. The Agricultural Element of the Santa Barbara County Comprehensive Plan indicates that there are approximately 105,060 acres of irrigated farmland within the County, including prime farmland, farmland of statewide importance, and unique farmland. The 3 acres of unique farmland and 76 acres of farmland of local importance proposed for conversion by Alternative A represent a statistically insignificant percentage of agricultural land in the County. There are roughly 1,330,280 acres of grazing land in the County (Santa Barbara County, 2011a), and implementation of Alternative A would remove approximately 0.05 percent (± 704 acres) of this grazing land from the jurisdiction of the County. Because this land is non-prime farmland, impact to agriculture would minimal.

The EA utilized the Farmland Conversion Impact Rating (FCIR) system to evaluate impacts to agricultural resources. The FCIR rating system is a tool used under the Farmland Protection Policy Act (FPPA) to establish a FCIR score on proposed sites of federally-authorized projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on farmland exceed the recommended allowable level. The purpose of the FPPA is to minimize the impact federal programs have on the conversion of farmland to nonagricultural uses and assures that, to the extent possible, federal programs are administered to be compatible with state and local units of government and private programs and policies to protect farmland. The FCIR form was completed in compliance with the instructions and submitted the form to the Natural Resources Conservation Service (NRCS). The design and factors considered in the FCIR rating system is not within the control of the BIA.

The project site received a FCIR score of 141 points for Alternative A, which is less than the threshold of 160 points and therefore does not warrant consideration of alternative project locations. The impact to agricultural resources would therefore be minimal. Text was updated in Section 4.1.8 of the Final EA to correct typos and add clarity.

No prime farmland would be converted under Alternative A or Alternative B. The area designated as prime farmland constitutes the existing vineyard, the area proposed for designation as a Resource Management Zone, and a portion of the areas proposed for designation as open space (refer to **General Response 3.1.9**).

As discussed in Section 4.2.8 of the EA, Alternative B would convert the same acres of unique farmland and would convert fewer acres of farmland of local importance and grazing land. This project site received a FCIR score of 137 points for Alternative B, which is less than the threshold of 160 points and therefore does not warrant consideration of alternative project locations. The impact to agricultural resources would therefore be minimal.

Refer to the response to **Comment L3-14** for a discussion of the evaluation of impacts to on-site existing agricultural operations, including grazing operations.

L3-19 Refer to **General Response 3.1.10** regarding land use authorities and compatibilities.

L3-20 Refer to the response to **Comment L3-16** concerning the dates utilized within the assessment sections of the EA.

L3-21 Refer to **General Response 3.1.10** regarding land use restrictions on the project site.

L3-22 Refer to **General Response 3.1.14** regarding lighting and glare impacts.

L3-23 Comment noted. Text was updated on page 3-59 of Section 3.8.3 of the Final EA to reflect the expiration of the ordinance.

L3-24 Refer to **General Response 3.1.10** for a discussion of land use compatibility related to residential lot sizes proposed under Alternatives A and B. If the project site were taken into trust, the County Agricultural Buffer ordinance and California pesticide regulatory program would no longer apply. Additionally, the development footprint of the tribal residences would account for approximately 50.1 and 35.8 acres for Alternative A and B, respectively, of the 1,433 acre project site. The remaining undeveloped areas would serve the purpose of an agricultural buffer to off-site agricultural operations by helping to prevent against the spread of insects, diseases, and weeds from the proposed residences.

L3-25 Comment noted. The EA is a planning level document, and as described in the Grading and Drainage Feasibility Analysis (included as Appendix D of the EA), the 7 detention basins included in the project design of Alternatives A and B will generally be 100 feet by 400 feet, with depths up to 15 feet. However, the final shape and design of the detention basins will depend on final placement, local terrain, and flow requirements (Appendix D of the EA). As stated in Section 4.1.1 of the EA, approximately 10,000 cubic yards of fill material would be required for Alternative A, and, as stated in Section 4.2.1 of the EA, approximately 75,000 cubic yards of fill material would be required for Alternative B. The Grading and Drainage Feasibility Analysis states that the required fill material will be reduced by including the amount of asphalt concrete and aggregate base needed for the road sections (including road shoulders), and excavated material from the on-site detention basins could be used as one source for the required fill. Once a project alternative is selected and the roadway structural section is finalized, these items could be adjusted to achieve a near-balanced cut and fill (Appendix D to the EA). Over-sizing a detention basin to obtain additional fill material would not result in an adverse effect on the detention basin's capacity or functionality. That being said, some structural grade fill may be imported to meet engineering requirements, as stated in both Section 4.1.1 of the EA regarding Alternative A and Section 4.2.1 of the EA regarding Alternative B. Accordingly, although Alternative B when compared to Alternative A would require more infill material and is designed with smaller detention basins, the infill material would be obtained from either excavated material from the on-site detention basins and/or import.

L3-26 Comment noted. Refer to responses to **Comments L3-27** through **L3-30**, **L3-45** and, **L3-47**. For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-27 An EIS is not necessary to provide a description of the existing level of service for fire fighting in the area and the capacity to provide such needs to the project site. Existing fire protection and emergency services as well as potential impacts that may result after implementation of project alternatives are discussed in Sections 3.9.6, 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA. As discussed therein, the Tribe currently provides financial support to the SBCFD to alleviate impacts to services from existing service to tribal operations and use of the project site for residential purposes could create additional demand for fire protection and require more frequent responses from local fire-fighting agencies. In addition, given that a majority of proposed residents of the housing development currently live in the Santa Ynez Valley, a significant increase in demands on the SBCFD would not occur (refer to the response to **Comment L3-12** for further discussion related to the project induced population growth).

The commenter states that there is currently no agreement in place that gives the SBCFD permission to access the tribal trust land; this is incorrect. The existing five-year agreement

between the Tribe and the SBCFD that renews annually grants permission to SBCFD to access tribal trust land at and around the existing Casino. The Tribe is in the process of working with Fire Chief Michael Dyer to update this service agreement, which will include provisions for structural and wildland fire protection at the project site if the trust acquisition is approved. This updated agreement will also address the commenter's concerns related to SBCFD's existing service agreement with CAL FIRE. Text was added to Section 4.1.9 of the Final EA to clarify this potential impact, and a mitigation measure was added to Section 5.9 of the Final EA to reduce this potential impact to a minimal level.

The commenter stated that the SBCFD does not use firefighter-to-population ratio to determine Standards of Cover and that the five minute response time standard in urban areas does not apply to the project alternatives as the project site is not within an urban area; associated text was updated in Section 3.9.6 of the Final EA for clarification.

As stated in Section 4.1.9 of the EA, an adverse impact to fire protection and emergency medical services would occur if project-related demands on public services would cause an exceedance of system capacities that result in a need for additional facilities, the construction and operation of which would result in adverse effects to the physical environment. Analysis related to specialized firefighting equipment to provide fire protection services to a non-residential structure (the proposed banquet/exhibition hall under Alternative B), is not necessary because such equipment is available in the County and, regardless, the impact would not result a physical impact on the environment.

As stated previously, the EA is a planning level document. Consequently, final plans for a water supply system for fire protection, such as the number, size, and location of storage tanks and location of associated water supply connections, has not yet been determined. Preliminary analysis of the water supply system, including the flow and storage requirements needed for fire protection, is presented in Appendix C of the EA. As stated therein, an estimated flow of 1,500 gpm for 2 hours and storage capacity of approximately 180,000 gallons would supply adequate fire suppression for Alternative A and for Alternative B, including the banquet/exhibition hall. The water supply system for fire protection will be designed such that water storage tanks would meet current standards for tank design and seismic requirements and tanks would be sited at locations to allow advantageous gravity flow while ensuring accessibility for maintenance, as discussed in Section 4.1.2 of the EA. Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall; refer to **General Response 3.1.17**. However, for a conservative estimate, no changes to the requirements for fire flow rate and water storage have been made.

Comments related to recommendations that the Tribe adopt the Santa Barbara County Fire Code of the California Fire Code are noted. As stated in Section 4.1.9 of the EA, all

development would be designed to meet the Tribe's building codes that include fire safety requirements, established under a tribal ordinance that is similar to International Building Code (IBC) standards.

For comments related to funding for public services, refer to **General Response 3.1.11**. For comments related to preparing an EIS to more completely analyze the impact to fire and emergency services, refer to **General Response 3.1.3**.

L3-28 Existing law enforcement services as well as potential impacts that may result after implementation of project alternatives are discussed in Sections 3.9.5, 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA. As discussed therein, use of the project site for residential purposes would result in a negligible increase in demands on the SBCSD. Calls for service would not be disproportionate to other residential development in the County. In addition, the proposed tribal residents are expected to relocate from existing housing units in the Santa Ynez Valley; therefore a significant increase in calls to the SBCSD would not occur (refer to the response to **Comment L3-12** for further discussion related to the project induced population growth). The Tribe would continue to provide funding to the SBCSD. No significant adverse impacts to law enforcement would occur that would result in physically adverse impacts to the environment. The analysis of potential impacts to law enforcement service within Section 4.0 of the EA provides a "hard look" at the potential impact to law enforcement services.

The commenter states that the SBCSD is responsible for search and rescue and 9-1-1 dispatch; text was updated in Section 3.9.7 of the Final EA to reflect this.

As discussed in Section 4.2.9 of the EA, planned special events at the banquet/exhibition hall may impact public services. The main access driveways would be utilized during special events, and mitigation was included in Section 5.9 of the EA to ensure a minimal impact to the California Highway Patrol (CHP). Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall; refer to **General Response 3.1.17**. As stated in Section 2.3 of the Final EA, the primary events at the tribal facilities would include for tribal events, functions, and ceremonies similar to events currently hosted at the existing Tribal Administrative Building on the Reservation. These facilities would be open to tribal members and their guests and would accommodate up to 400 attendees. Additional law enforcement staff would not be necessary to promote an orderly event or ensure the safety of attendees.

L3-29 Text was updated in Section 3.9.3 of the Final EA to reflect the more recently adopted Assembly Bill (AB) 341, and the analysis contained within the Final EA considers the existing diversion rate of 75 percent. The mitigation in Section 5.3.1 of the Final EA was updated to be consistent with these standards, as the Tribe is committed to reducing the amount of solid waste transported to landfills. Text was updated in Sections 3.9.3, 4.1.9, and

4.2.9 of the Final EA to reflect the information provided by the commenter regarding the Tajiguas Sanitary Landfill. The Final EA therefore accurately depicts existing resources related to solid waste and the potential impacts of the Proposed Action and project alternatives to public services related to solid waste. Accordingly, an EIS is not necessary to achieve the objective of factual correction.

Solid waste generation associated with construction activities is described in Section 4.1.9 of the EA and would be temporary in nature. The amount of construction waste would be consistent with projects of similar size and scope, and the Tribe would recycle as much of the construction waste as possible. The Tribe anticipates diverting approximately 50 percent of construction solid waste. Text was added to Section 4.1.9 of the Final EA to provide additional information. The amount of solid waste generated by construction activities would not create the need for an expanded, upgraded, or new solid waste transfer and disposal facilities, and therefore would not result in a significant impact.

Solid waste generated by agricultural operations under Alternatives A and B would be less than currently generated on the project site. Alternatives A and B would remove approximately 704 acres and 135 acres, respectively, from grazing operations and both alternatives would remove approximately 50 acres of vineyards (refer to **General Response 3.1.9**), which would reduce the amount of agricultural solid waste generated on site. For the purpose of analysis in the EA, it was assumed a negligible change would occur in the amount of solid waste generated by existing and proposed agricultural operations; text was added to Section 4.1.9 and 4.2.9 of the Final EA for clarification.

The rate of solid waste generation from events at the banquet/exhibition hall would depend on various factors, such as the type of event and event attendance. As stated in Section 4.2.9 of the EA, solid waste accumulated during special events at the exhibition hall would be collected at the time of the event through contractors hired by the Tribe and disposed of. Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall; refer to **General Response 3.1.17**. Assuming a standard generation rate of 244 pound per 100 attendees (CalRecycle, 2006) and a conservative maximum of 400 attendees per event, the facility would generate approximately 976 pounds (0.5 tons) of waste per event. Text was added to Section 4.2.9 of the Final EA to provide this additional quantification. With 170 tons per day of remaining capacity at the local transfer station and 850 tons per day of remaining capacity at the local landfill, these intermittent events would not adversely impact solid waste facilities. Additionally, implementation of the BMPs presented in Sections 2.2.10 and 2.3.1 of the EA would further reduce impacts to solid waste facilities. Text was added to Section 4.2.9 of the Final EA for clarification as to the estimated quantity of solid waste that would be generated by the proposed banquet/exhibition hall.

For comments related to project induced population growth, refer to the response to **Comment L3-12**.

An EIS is therefore not necessary to update the information and analysis regarding solid waste.

L3-30 The existing public schools and park and recreational facilities are described in Section 3.9 of the EA, and impacts of the project alternatives to these facilities are considered in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA. As discussed therein, the impact to public schools and recreational facilities would be minimal with implementation of Alternatives A or B because any increase in population from the newly vacant residences by tribal members moving off-reservation to the project site would be minimal. The purpose of the Proposed Action and project alternatives is to provide new tribal housing. As stated in Section 1.3 of the EA, the Tribe has a population of 136 tribal members and approximately 1,300 lineal descendants. Approximately 17 percent of members and lineal descendants (approximately 244 people) have housing on tribal lands; the majority of the remaining balance of members and lineal descendants live within the Santa Ynez Valley and surrounding region. Even though the existing land assignments on the Reservation would remain unchanged, there is enough of a demand from members and lineal descendants not currently on the Reservation for additional housing. It is possible that new residents from outside of the region could move into homes vacated by tribal members; however, this would not result in a substantial increase in population of the Santa Ynez Valley. Refer to the response to **Comment L3-12** for further discussion related to the project induced population growth. Further, tribal members and lineal descendants under the existing tribal education policy have the option of attending private elementary schools which is 100 percent paid by the Tribal Education Department. The Tribe has also made substantial donations to public schools and recreational facilities; refer to **General Response 3.1.11** for further discussion. The EA therefore considers all impacts to schools, parks, and recreational facilities. Any potential increase in enrollment in local schools would not be significant. Development of the project would not increase the number of park users enough to adversely impact local parks and recreation. Therefore, an EIS is not necessary to provide further analysis.

It is unclear how the commenter calculated the projected student growth from the project based on methodology in the SYVCP, as it appears no such methodology is contained within the SYVCP. Regardless, as discussed above, Alternatives A and B would result in minimal increase in enrollment to public schools as the majority of new tribal residents currently reside within the Santa Ynez Valley, the impact of families relocating to residences vacated by tribal members would be negligible, and the proposed housing would be developed over time as needed. The commenter goes on to state that an EIS is necessary for an updated analysis of the capacity of nearby schools to serve the project given that the SYVCP is four

years old. As discussed above, the EA presents a complete and detailed assessment of the potential impacts of the project alternatives to public schools, and an EIS is not necessary to provide additional analysis.

L3-31 Comment noted. Refer to responses to **Comments L3-32** through **L3-34** and **L3-43**. For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-32 Refer to **General Response 3.1.9** for a discussion of the analysis presented in the EA of potential impacts of the project alternatives to groundwater resources. Although the commenter is correct that Table 2 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (Santa Barbara County, 2008) defines a withdrawal of 61 acre-feet per year (AFY) as significantly adverse, the source of the supportive data is more than 20 years old (last revised August 20, 1992). Groundwater levels in U.S. Geological Survey monitored wells to the north, east, and west of the project site have risen since the mid-1990s (Appendix C to the EA). The analysis presented in the EA and the Water and Wastewater Feasibility Study (Appendix C to the Final EA) considered more recent data, including the Santa Barbara County Groundwater Report (2008), and concluded that, with implementation of mitigation presented in Section 5.2 of the EA, the water demands of either project alternative would not have an adverse impact on groundwater resources. The Santa Barbara County Groundwater Report released May 1, 2012 (after publication of the Water and Wastewater Feasibility Study) presented findings consistent with those presented in the 2008 report with respect to the Santa Ynez Uplands Groundwater Basin (Uplands Basin). Further, more recent planning documents have indicated that the Uplands Basin has surplus supply; refer to **General Response 3.1.9** for further discussion.

The EA considers supplemental supplies and potential future demand for potable water. As stated in Section 3.2.2 of the EA, groundwater levels are influenced by riparian underflow in local tributaries to and from the Santa Ynez River, precipitation, and irrigation using surface water from Lake Cachuma and the State Water Project (Tetra Tech, 2010). As discussed in Section 3.9.1 of the EA, existing water requirements in the vicinity of the project site are met either via private groundwater wells or via connection to the Santa Ynez River Water Conservation District, Improvement District #1 (ID1). The project site is located just outside of the jurisdictional boundary of ID1. ID1 water supplies consist of allotments from the State Water Project, allotments from the Central Coast Water Authority, and 19 groundwater supply wells. As discussed in Section 4.4.2 of the EA, with implementation of mitigation included in Section 5.2 of the EA, providing potable water for the selected alternative would not impact other existing and proposed projects in the vicinity. Future projects would be subject to County provisions regarding potable water supplies and water conservation, thereby preventing any cumulative impacts of the selected alternative in the future.

The purpose of the commenter's statement "that the Cachuma Project does not constitute an additional water source" is unclear, as the EA never implies that water from Lake Cachuma would supply the selected project alternative or any other project considered in the cumulative scenario.

For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-33 The Tribe conducted additional field well pumping tests and water quality analysis in January and February 2014 (Appendix C to the Final EA; refer to **General Response 3.1.9** for further discussion). The results of these tests and analyses confirm that the water quality of the existing wells is sufficient for use as no analytes were present in concentrations above the primary or secondary standards for drinking water, including nitrate and other chemicals related to septic system contamination. Text in Section 3.2 and Appendix C of the Final EA were updated to incorporate these additional data. For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-34 The solid waste and liquid sludge generated by operation of the proposed WWTP would be hauled off site and appropriately disposed of via a private contractor, similar to the process in place at the Tribe's WWTP located on the Tribe's Reservation. Text has been added to Section 2.2.6 of the Final EA for clarification. An EIS is not required to provide the information regarding waste generated at the proposed WWTP to allow the BIA to take a "hard look" at the associated environmental impacts.

L3-35 Refer to **General Response 3.1.7** regarding impacts to oak trees.

L3-36 Refer to **General Response 3.1.7** regarding impacts to vernal pool fairy shrimp (VPFS). An EIS is therefore not necessary to analyze impacts to VPFS.

L3-37 Biological resources are discussed in Sections 3.4.1, 4.1.4, 4.2.4, and 5.4.3 of the EA in accordance with the CEQ Regulations for Implementing NEPA, the BIA NEPA Guidebook, and federal requirements under the Endangered Species Act. Refer to **General Response 3.1.7** for additional discussion. Also, because of minimal quality and quantity of habitat on the project site to support western pond turtles, impacts to on-site habitat associated with construction are anticipated to be minimal. Combined with mitigation and avoidance of wetlands and streams that shall occur as part of the selected project alternative, as required under the Clean Water Act, the western pond turtle will be protected without implementation of additional mitigation measures.

L3-38 Potential impacts of global climate change are discussed in Section 4.3.3 of the EA. Language has been added to Section 4.1.3 of the EA to define the climate change significance criteria. It is unclear why the commenter feels the EA relies on conclusory statements based

on vague description of the Santa Barbara County Climate Action Strategy (CAS). As shown in Section 4.4.3 of the EA, a direct comparison of the CAS and project mitigation or BMPs is provided, as well as a quantification of project-related greenhouse gas (GHG) emissions. Language has been added to Sections 3.3 and 4.1.3 the EA to clarify the CAS has not yet been adopted by the County; however, the County strategies are consistent with the State's AB 32 reduction strategies and are therefore reasonable criteria for determining the project's climate change significance.

Section 5.3 of the EA provides mitigation which would minimize project-related emissions of criteria pollutants. Quantification of the mitigation measures and BMPs provided within the EA for air quality were not quantified as the impacts were not determined to be significant.

L3-39 The commenter believes the EA lacks specific information to fully evaluate traffic impacts. Traffic impacts are fully evaluated in Section 4.0 and Appendix I of the EA. Alternatives A and B would increase traffic on local roadways. However, as shown in Section 4.0 and Appendix I of the EA, Alternatives A and B would not significantly increase congestion. As shown in Section 4.0 and Appendix I of the EA, all roadways and intersections in the study area (as defined in the TIS) would operate acceptably under the County's level of service criteria. It is unclear what questions the commenter is referring to.

Once the project site is in trust, it will not be under the jurisdiction of the County; however, as stated by the commenter, the EA does not provide County permit requirement for accessing the project site. Language has been added to Section 1.6 of the Final EA stating that the County regulatory requirement for access permitting would be completed. These permits will dictate the design of the access to the project site; therefore, the access will be designed according to County standards.

As shown in Section 4.0 and Appendix I of the EA, project-related traffic would not result in an unacceptable capacity on County roadways. An acceptable County roadway capacity is based on the County's LOS B standard, adopted for the Santa Ynez area. Therefore, no mitigation is required for County roadways and no fair share contribution is necessary. Since County roadways would operate under acceptable conditions with the implementation of the proposed alternatives, a turn lane warrant assessment for County roadway access unnecessary. No further traffic analysis would be warranted. However, since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall. The Final EA and associated technical studies have been updated accordingly; refer to **General Response 3.1.17** for further discussion.

Because it is not known exactly what type of events will be held at the banquet/exhibition hall, a conservative trip generation rate of 22.88 trips per thousand square feet is used. The trip generation rate is from the Institute of Transportation Engineer's Trip Generation Report,

8th Edition, 2008, land use code 495. The land use generally defines a standalone structure that facilitates a variety of events. At the time the EA was prepared, the exact type of events was not known; therefore, the land use code 495 is an appropriate trip generation rate. Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall. The Final EA and associated technical studies have been updated accordingly; refer to **General Response 3.1.17** for further discussion. As the exact type of events that would be held at the revised tribal facilities is not known at this time, the analysis used land use code 495.

The commenter is correct that the EA states that the Tribe will be required to contract with the CHP to ensure visitor access to the project site does not interfere with roadway operations, and mitigation that was developed in consultation with CHP is included in Section 5.9 of the EA. However, since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall; refer to **General Response 3.1.17** for further discussion. Given the reduced maximum attendance at events at the tribal facilities, there would be no need for traffic management or coordination with the CHP and/or the County; Section 5.9 of the Final EA has been updated accordingly.

For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-40 Refer to **General Response 3.1.14** for a discussion of the impact to visual resources, including the scenic resources of SR-154, the potential impacts of the proposed one-acre housing development, the potential impacts of the proposed banquet/exhibition hall, and the potential impacts on night and outdoor lighting. If the project site is taken into trust, the County's Outdoor Lighting Regulations for the SYVCP area would no longer be applicable. An EIS is not required to provide the information regarding visual resources to allow the BIA to take a "hard look" at the associated environmental impacts.

L3-41 The EA (referred to as the 'Camp 4 EA' in the following response for clarity) provides the appropriate level of detail to evaluate the potential cumulative impacts of the project alternatives and all past, present, and reasonably foreseeable actions and projects in Section 4.4 of the Camp 4 EA. In addition, the cumulative setting accurately describes development in the project areas that could result in cumulative impacts from the Proposed Action. The Tribe's proposed hotel expansion project, proposed by the Tribe in February 2014, has been included in the cumulative setting in Section 4.4 of the Final Camp 4 EA; text in Section 4.4 of the Final Camp 4 EA and technical studies were updated accordingly (for example, the cumulative setting of the TIS was updated to account for the hotel expansion). The commenter states that incremental impacts of past, present, and reasonably foreseeable future actions, even if all development complies with codes, standards, and ordinances, are exactly what an EA is required to consider, referencing 40 CFR 1508.7. This reference is to the CEQ

Regulations for Implementing NEPA, in particular the definition of a cumulative impact. This reference by the commenter states that a:

> *Cumulative impact* is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The reference does mention other actions' compliance with codes, standards, and ordinances. The cumulative analysis within Section 4.4 of the Camp 4 EA adequately assesses such actions in accordance with the definition referenced by the commenter.

The commenter cites *Ocean Advocates v. U.S. Army Corps of Engineers,* 402 F.3d 846 (9th Cir. 2005) as support for the comment that "[t]he Environmental Assessment's discussion of cumulative impacts consists of perfunctory general statements about possible effects and fails to provide a useful analysis of the cumulative impacts of past, present, and future projects." Ocean Advocates states that the "cumulative [impact] analysis 'must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects'" (*Ocean Advocates v. U.S. Army Corps of Engineers,* 402 F.3d 846, 868 (9th Cir. 2005)). It does not, however, provide any examples of what it considered "perfunctory" statements. In Ocean Advocates, the U.S. Army Corps of Engineers approved a dock extension, but the Ninth Circuit held that the conclusion that the extension would not result in increased ship traffic was unsupported because "The Corps based this conclusion on an unsubstantiated letter from BP [which used the dock for the purpose of shipping oil], claiming that it had many options other than sea travel for transporting crude and refined oil to and from its refinery" (*Ocean Advocates v. U.S. Army Corps of Engineers,* 402 F.3d 846, 868 (9th Cir. 2005)). However, the Camp 4 EA does contain a thorough discussion of the cumulative impacts in Section 4.4. *Shasta Resources Council v. U.S. Dept. of Interior,* 629 F. Supp. 2d 1045, 1062 (E.D. Cal. 2009) held that an EA adequately addressed the cumulative impacts of a project as it addressed "air quality . . . cultural resources . . . fisheries . . . water quality . . . .wildlife," and five other items, which is comparable to the Camp 4 EA as it discusses the "Potential cumulative impacts" on land resources, water resources, air quality, biological resources, cultural resources, and seven other items.

The commenter cites *Kern v. U.S. Bureau of Land Management,* 284 F.3d 1062 (9th Cir. 2002) as support for the comment that "[t]he Environmental Assessment fails to provide quantified and detailed information regarding cumulative impacts and thus does not constitute the 'hard look' required by NEPA." Kern states that "Consideration of cumulative impacts requires 'some quantified or detailed information; . . . General statements about 'possible'

effects and 'some risk' do not constitute a 'hard look' absent a justification regarding why more definitive information could not be provided'" (*Kern v. U.S. Bureau of Land Management*, 284 F.3d 1062, 1075 (9th Cir. 2002)). The EA at issue in Kern County, unlike the Camp 4 EA, included no cumulative impact analysis beyond the area covered by a timber sale plan and thus was deemed inadequate. Conversely, the Camp 4 EA contains sufficient information about the cumulative impacts of the project alternatives in Section 4.4 to allow the BIA to take a "hard look" as required by NEPA.

The County cites *Center for Environmental Law and Policy v. US Bureau of Reclamation* (655 F.3d 1000 (9th Cir. 2011)) as support for the statement that "Consideration of cumulative impacts 'requires some quantified or detailed information' in order to result in a useful analysis." Refer to the response to **Comment L3-09** for a discussion as to why this case is not applicable to the Camp 4 EA.

The commenter cites *Te-Moak Tribe of Western Shoshone of Nev. v. United States DOI,* 608 F.3d 592 (9th Cir. 2010) as support for the comment that "the Environmental Assessment's cumulative impact section incorrectly focuses on the impacts of the project, rather than the combined impacts resulting from the activities of the project along with past, present, and reasonably foreseeable projects." This case involves the amendment of a project and the combined impacts from other projects:

> We note that the bulk of the EA's discussion in these two sections focuses on the effects of the Amendment itself, rather than the combined impacts resulting from the activities of the Amendment with other projects. Although part of the BLM's analysis discusses "[t]he effects of the activities to be conducted under the [proposed Amendment] within the cumulative effects study area," only two of the seven paragraphs in these two sections refer to cumulative effects. The majority of the discussion focuses on how effects of the Amendment's additional exploration activities will be avoided or mitigated. The EA's discussion of the Amendment's direct effects in lieu of a discussion of cumulative impacts is inadequate (*Te-Moak Tribe of Western Shoshone of Nev. v. United States DOI*, 608 F.3d 592, 603–604 (9th Cir. 2010)).

In contrast, the Camp 4 EA adequately analyzes the cumulative effects of the project alternatives in Section 4.4.

The commenter cites *Bering Strait Citizens for Responsible Res. Dev. v. United States Army Corps of Engineers,* 511 F.3d 1011 (9th Cir. 2008) as support for its assertion that the "Environmental Assessment's 'generalized conclusory statements that the effects are not significant or will be effectively mitigated' are the type of statements that 'do not constitute a

hard look.'" However, in Bering Strait Citizens, the challenged EA was deemed adequate by the court because it "succinctly but adequately discusses the cumulative impacts of the project and points out the Corps' determination that the project will leave portions of the drainage in "more natural conditions than currently exist" due to mitigation measures included in the permit (*Bering Strait Citizens for Responsible Res. Dev. v. United States Army Corps of Engineers,* 511 F.3d 1011 (9th Cir. 2008)). To be sure, the EA does not discuss at length other projects taking place in the Nome region. However, the record indicates—and we were assured at oral argument—that this is because there are no projects of similar magnitude at this time" (*Bering Strait Citizens for Responsible Res. Dev. v. United States Army Corps of Engineers,* 511 F.3d 1011 (9th Cir. 2008)). The opinion cited was amended and superseded at 524 F.3d 938 (9th Cir. 2008), which also upheld the cumulative impact analysis in the EA. The Camp 4 EA does adequately discuss all environmental effects, including cumulative effects in Sections 3.0 through 5.0.

The commenter cites *Neighbors of Cuddy Mountain v. U.S. Forest Service,* 137 F.3d 1372 (9th Cir. 1998) as support for the comment that the Camp 4 "Environmental Assessment's 'generalized conclusory statements that the effects are not significant or will be effectively mitigated' are the type of statements that 'do not constitute a hard look.'" In *Neighbors of Cuddy Mountain*, the court stated that "[t]he Forest Service provided some information in regard to the cumulative effects of all proposed timber sales on old growth habitat, but the analysis provided was very general, and did not constitute the hard look that the Forest Service is obligated to provide under NEPA" (*Neighbors of Cuddy Mountain. v. U.S. Forest Service,* 137 F.3d 1372 (9th Cir. 1998)). The EA was held to be inadequate because it failed to address three reasonably foreseeable future timber sales and "[t]he sole reference to future sales stated, 'Future timber sales over the next several years would propose to treat additional old-growth habitat'" (*Neighbors of Cuddy Mountain. v. U.S. Forest Service,* 137 F.3d 1372 (9th Cir. 1998)). The court concluded that "Without such information, neither the courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide" (*Neighbors of Cuddy Mountain. v. U.S. Forest Service,* 137 F.3d 1372 (9th Cir. 1998)). Conversely, the Camp 4 EA considers all past, present and reasonably foreseeable future projects in Section 4.4 and presents quantified, where appropriate (e.g. Section 4.4.3), and detailed information. The Camp 4 EA therefore provides the "hard look" as required by NEPA.

In Section 4.4 of the Camp 4 EA, impacts of the project alternatives are considered as they would interact with or add to the impacts of other past, present, and reasonably foreseeable projects. For example, in Section 4.4.1:

> Reasonably foreseeable development projects could result in alterations to land resources to accommodate development in urban areas or areas

> designated under the Santa Ynez Valley Community Plan and Santa Barbara General Plan. Future developments would be required to be in compliance with local and state building codes and ordinances to ensure buildings are constructed to appropriate seismic standards and with local, state, and federal requirements to prevent water quality degradation from soil erosion. Accordingly, potential cumulative impacts to land and mineral resources would be minimal.

Regarding air quality, the Camp 4 EA discusses that the project alternatives would not result in adverse cumulative affects to regional air quality or GHG emissions because, as explained in Section 4.4.3, "If a project's individual emissions contribute toward exceedance of the NAAQS, then the project's impact on air quality would be cumulatively considerable." This is due to the fact that, as stated in Section 4.4.3 of the Camp 4 EA, "Past, present and future development projects contribute to a regions air quality conditions on a cumulative basis; therefore by its very nature, air pollution is largely a cumulative impact." Lastly, the commenter is misinterpreting the text in Section 4.4.10 of the Camp 4 EA, which states "Alternatives A or B would not result in significant cumulative impacts to public services." In accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, cumulative effects are defined as "the impact on the environment which results from the incremental impact *of the action* when added to other past, present, and reasonably foreseeable future actions" (40 CFR 1508.7) (emphasis added). Only the addition of the impacts of the Proposed Action and project alternatives in the context of the cumulative setting, which includes other past, present, and reasonably foreseeable projects, is relevant.

For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

L3-42 The mitigation measures presented in the EA (referred to as the 'Camp 4 EA' in the following response for clarity) are adequate as they provide the appropriate level of detail and measures of effectiveness. The commenter cites *Neighbors of Cuddy Mountain v. U.S. Forest Service,* 137 F.3d 1372 (9th Cir. 1998) as support for the comment that the "mitigation measures identified in the [Camp 4] Environmental Assessment are inadequate because they are a 'mere listing' of mitigation measures and are insufficient to qualify as the reasoned discussion required by NEPA" and the "the EA fails to provide an estimate of how effective mitigation measure would be if adopted, or give a reasoned explanation as to why such an estimate is not possible." In *Neighbors of Cuddy Mountain*, unlike the Camp 4 EA, the EA did not discuss mitigation measures. Mitigation measures are discussed in Section 5.0 of the Camp 4 EA, and therefore the referenced case-law does not apply. Section 5.0 of the Camp 4 EA presents BMPs, contractual obligations, and avoidance measures that will reduce adverse impacts to the environment.

The commenter cites *Okanogan Highlands Alliance v. Williams,* 236 F.3d 468 (9th Cir. 2000) as support for the comment that "[t]he mitigation measures identified in the Environmental Assessment are inadequate because they are a 'mere listing' of mitigation measures and are insufficient to qualify as the reasoned discussion required by NEPA." But Okanogan involves a challenge to an EIS, not an EA:

> An EIS is not complete unless it contains "a reasonably complete discussion of possible mitigation measures." *Robertson v. Methow Valley Citizens Council,* 490 U.S. 332, 352, 109 S.Ct. 1835, 104 L.Ed.2d 351 (1989). That requirement is implicit in NEPA's demand that an EIS must discuss " 'any adverse environmental effects which cannot be avoided should the proposal be implemented.' " Id. at 351-52, 109 S.Ct. 1835 (quoting NEPA, 42 U.S.C. § 4332(C)(ii)); see also 40 C.F.R. § 1502.16(h) (stating that an EIS must contain "[m]eans to mitigate adverse environmental impacts"). NEPA does not contain, however, "a substantive requirement that a complete mitigation plan be actually formulated and adopted" (*Okanogan Highlands Alliance v. Williams,* 236 F.3d 468 (9th Cir. 2000)).

Okanogan also held that the EIS was adequate because it "provide[d] methods for ensuring that environmental problems do not develop" (*Okanogan Highlands Alliance v. Williams,* 236 F.3d 468 (9th Cir. 2000)). The discussion of the mitigation measures in the Camp 4 EA is adequate because Section 5.0 of the Camp 4 EA also provides methods for ensuring that environmental problems will not develop. In addition, should a FONSI be prepared for the Proposed Action, a mitigation monitoring and enforcement program (MMEP) will be included for adoption.

The commenter cites *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989) as support for the comment that the Camp 4 "Environmental Assessment discussion of mitigation fails to contain 'sufficient detail to ensure that environmental consequences have been fairly evaluated.'" In *Robertson*, the court rejected the argument that NEPA requires a fully developed mitigation plan:

> There is a fundamental distinction, however, between a requirement that mitigation be discussed in sufficient detail to ensure that environmental consequences have been fairly evaluated, on the one hand, and a substantive requirement that a complete mitigation plan be actually formulated and adopted, on the other (*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989)).

Here, the Camp 4 EA does contain sufficient detail about the mitigation plan in Section 5.0 to satisfy the "hard look" requirement of NEPA.

With implementation of the mitigation measures contained in Section 5.0 of the Camp 4 EA, all impacts of the Proposed Action and project alternatives would be reduced to a minimal level. This therefore provides a measure of the effectiveness of mitigation measures, as requested by the commenter. Additionally, the mitigation provided in the Camp 4 EA does minimize the impacts of the project alternatives to water quality, air quality and public service resources (fire); this is further discussed in the responses to **Comment L3-43** (water quality), **Comment L3-44** (air quality), and **Comment L3-45** (public service resources) below.

L3-43 Refer to **General Response 3.1.9** regarding water quality data. Refer to the response to **Comment L3-42** regarding the effectiveness of mitigation measures presented in Section 5.0 of the EA.

L3-44 Comment noted. Section 5.3 of the EA provides emissions reduction measures to further minimize project-related emissions. As shown in Section 4.0 of the EA, project-related criteria pollutant and GHG emissions do not cause an adverse impact to local or regional air quality; therefore, mitigation and associated quantification of effectiveness is not warranted. The Tribe provides BMPs in Section 5.0 of the EA and project design features provided in Section 2.0 of the EA to further minimize project-related emission.

The Tribe will work with the City of Solvang to assess new stops for the Santa Ynez Valley Transit system to the needs of the selected alternative. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared, which will specify the implementation and timing of the mitigation measures. The Tribe is not required to be in compliance with California requirements, such as AB 341. That being said, the Tribe is committed to diverting 75 percent of solid waste from landfills to further reduce project-related GHG emissions. The mitigation measures in Section 5.3 of the EA provide sufficient detail to ensure that adverse environmental impacts identified in Section 4.0 have been minimized.

L3-45 The commenter is correct that code compliance does not mitigate the need for emergency fire response services for Alternatives A and B. Accordingly, several mitigation measures are included in Section 5.9 of the EA that consist of protective measures that will reduce the risk of fire during construction and operation of the selected project alternative as well as ensure fire protection services are provided by the SBCFD (refer to the response to **Comment L3-27** for further discussion). The existing setting related to fire protection and emergency response services is adequately described in Sections 3.9.6 and 3.9.7 of the EA, and potential impacts to fire protection services are fully evaluated in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA.

L3-46 Refer to **General Response 3.1.7** and the response to **Comment L3-42** regarding the effectiveness of mitigation measures presented in Section 5.0 of the EA.

L3-47 Comment noted. Since the release of the EA, the Tribe has revised the tribal facilities proposed under Alternative B to exclude the banquet/exhibition hall; refer to **General Response 3.1.17**. As stated in Section 2.3 of the Final EA, the primary events at the tribal facilities would include for tribal events, functions, and ceremonies similar to events currently hosted at the existing Tribal Administrative Building on the existing Reservation. It is therefore not anticipated, with the revision to the type of and maximum attendance at events that would occur at the proposed tribal facilities, that a significant increase in calls requesting law enforcement services would occur. Mitigation has been added to Section 5.9 of the Final EA to address concerns related to contracts and agreements for fire protection services (refer to the response to **Comment L3-27** for further discussion). The current financial support provided by the Tribe to the County for law enforcement and fire protection and emergency services is not limited to funding from the Indian Gaming Special Distribution Fund; refer to **General Response 3.1.11**. The ongoing funding from these agreements, not only the Indian Gaming Special Distribution Fund, will continue to support these services at the project site.

L3-48 Refer to **General Response 3.1.2** concerning the withdrawn TCA and the effort of review required for an off-reservation fee-to-trust acquisition request. The EA states that a trust acquisition request within a TCA is given the same level of scrutiny as a trust acquisition request contiguous to a Tribe's existing trust lands. As discussed in **General Response 3.1.2**, this level of scrutiny pertains to the Secretary of the Interior's review of the purpose and need of the project. The level of environmental review is the same regardless of the request being contiguous to or distant from the Tribe's existing trust lands.

L3-49 The commenter is correct that the No Action Alternative often includes development that is reasonably foreseeable on the site if the Proposed Action never happens. However, it is not always reasonably foreseeable under NEPA that development will occur under the No Action Alternative. Existing land use controls would prevent development that would benefit the Tribe in accordance with the purpose and need presented in the EA. The Tribe initially had no plans to develop the property if it is not taken into trust; however, since the release of the EA, the Tribe has revised its plans to expand the existing vineyard by approximately 44 acres if the Proposed Action is not approved; refer to **General Response 3.1.18** regarding revisions the No Action Alternative.

For comments related to analysis of additional alternative actions and projects, refer to **General Response 3.1.13**

For comments related to requirements for an EIS, refer to **General Response 3.1.3**.

For comments related to the TCA, refer to **General Response 3.1.2**.

L3-50 Refer to **General Response 3.1.3** for a discussion related to the requirements for an EIS.

Response to Comment Letter L4 – Gary M. Kvistad and Diane C. De Felice, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1

L4-01 Comment noted and the comment letter and attachments are hereby incorporated into the administrative record. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L4-02 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

L4-03 and **L4-04**

The Secretary of the Interior has the authority to place the project site into trust for the Tribe. Section 5 of the Indian Reorganization Act of 1934 (48 Stat. 984), as amended, provides the authority for this acquisition. The process for securing this land acquisition is governed generally by 25 CFR Part 151. The Santa Ynez Band of Chumash Mission Indians (Tribe) is recognized as an American Indian Tribe by the Secretary of the Interior ["Indian Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs" Federal Register 78 (6 May 2013): 26384-26389] and has been determined by the Department of the Interior to have "been under Federal jurisdiction in 1934" according to the Solicitor's Opinion dated May 23, 2012. For comments related to the TCA, including associated standards of review of the EA, refer to **General Response 3.1.2**. For comments related to the range of alternatives evaluated within the EA, refer to **General Response 3.1.13**. Potential impacts resulting from the use of groundwater by the project alternatives are discussed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA. Mitigation is included in Section 5.2 of the EA to ensure potential impacts are reduced to a minimal level; refer to **General Response 3.1.9** for further discussion. Cumulative impacts, including an accurate discussion of the cumulative setting, are addressed in Section 4.4 of the EA. For comments related to consideration of cumulative impacts in the EA, refer to the responses to **Comments L3-09** and **L3-41**.

L4-05 Refer to **General Response 3.1.2** for comments related to the TCA, including associated standards of review of the EA.

L4-06 Comment noted. Refer to **General Response 3.1.10** and the response to **Comment L3-09** regarding land use consistency and associated analysis within the EA.

L4-07 For comments related to consideration of a reasonable range of alternatives evaluated within the EA, refer to **General Response 3.1.13**. The Tribe's development plans for the project

site are included in Appendix N of the EA; refer to **General Response 3.1.12** for further discussion of regulation of future development on the project site.

L4-08 Section 4.1.2 of the EA offers several pieces of evidence to support the conclusion that the three existing wells on the project site can be relied upon for agricultural use. As stated by the commenter and stated in Section 4.1.2 of the EA, altered pumping patterns throughout the County and the importation of supplemental water has resulted in more balanced groundwater conditions; these changes in water use and more recent planning documents indicating a surplus in groundwater supply in the Uplands Basin (refer to **General Response 3.1.9**) suggest that the three existing wells can be relied upon for agricultural use. Additionally, as stated in Section 4.1.2 of the EA but not stated by the commenter, the three existing wells are reliable for future irrigation use based on their design, location within the project site, and their location within the deepest part of the groundwater basin. Further, as stated in Section 4.1.2 of the EA but not stated by the commenter, agricultural demands for potable water would be reduced with the use of recycled water for irrigation of the vineyard. In response to comments, the Tribe conducted field well pumping tests which confirm the existing wells have adequate capacity to support the existing agricultural land use on the project site (refer to **General Response 3.1.9**). Additionally, since the release of the EA, the Tribe has revised the vineyard development plans under Alternatives A and B to reduce vineyard production by 50 acres thereby further reducing agricultural water demand; refer to **General Response 3.1.9**.

Refer to **General Response 3.1.2** regarding the TCA. As the TCA has been withdrawn, comments related to the TCA are moot.

The commenter is correct that the hydrographs displayed in Figure 2-5 of Appendix C generally indicate declining water levels in the associated wells since the early to mid-2000s until approximately 2010. Refer to **General Response 3.1.9** regarding concerns that the Uplands Basin is in a state of overdraft, that additional extractions associated with the Proposed Action would exacerbate the overdraft conditions, and that mitigation measures would ensure minimal impacts to off-site wells, including those owned and operated by the ID1.

The Tribe would bear the costs associated with providing a water supply for the selected project alternative, which would include any associated development studies, installation, and operation of new groundwater wells. Per the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, analysis and mitigation of the impacts of the project alternatives on costs associated with obtaining water for other entities, such as the ID1, are not required within an EA as the EA should only consider impacts to environmental resources.

L4-09 Section 2.3 of the EA refers the reader to Appendix C of the EA (Water and Wastewater Feasibility Study) for a discussion of the water facilities required for Alternative B. Table 2-2 of Appendix C of the EA indicates that the net increase in water demand for Alternative B would be 106 AFY. Since the release of the EA and in response to current economic conditions in the Santa Ynez Valley and surrounding area, the Tribe has revised the development components included in Alternative A and B. Water demands in the Final EA have been revised accordingly; refer to **General Response 3.1.9** for further discussion. Text was added to Section 4.2.2 of the Final EA to clarify the net increase in water demand over existing conditions for Alternative B would be 54 AFY.

L4-10 Water quality analysis of the existing on-site groundwater wells was performed in January 2014 (Appendix C to the Final EA). Results indicate the specific conductivity is nearly the same magnitude, at 845 umhos/cm. A corresponding total dissolved solids (TDS) value of 420 mg/L was also measured during the January 2014 analysis. This level of TDS is common in drinking water across the nation and, for California, would be considered a very desirable quality from a drinking water standpoint. Irrigation of crops is accomplished throughout the nation and world with water of this quality without the need for leaching/ flushing of salts. The Monterey Regional Water Pollution Control Association (MRWPCA) operates one of the largest scale water recycling operations in the world, in the heart of the "salad bowl," Salinas Valley, California. Farmers in this area utilize treated wastewater for direct food crop irrigation, with TDS values ranging between 800 and 1,000 mg/L, and a sodium absorption ratio (SAR) (adjusted) of around 5.5 to 7.5. According to the U.S. Environmental Protection Agency (USEPA, 2012) 2012 Guidelines for Water Reuse (Table 3-4, Guidelines for Interpretation of Water Quality for Irrigation), MRWPCA's water quality would be considered to have a slight to moderate degree of restriction on irrigation; however, recycled water is used year-round on food crops with no documented ill effects from recycled water quality. Given that the potable water quality at the project site has a specific conductivity value of approximately 0.85 mmhos/cm (845 umhos/cm) and a SAR value of 0.7, water quality restrictions of this water for irrigation would be slight to none per the USEPA 2012 Guidelines for Water Reuse. Wastewater quality would be expected to be of equal or better mineral quality than MRWPCA's wastewater, and restrictions on irrigation expected to be minimal. The Tribe does not anticipate the need to flush salts to augment irrigation practices on site. Furthermore, the Tribe plans to blend existing well water with recycled water from the treatment plant, and thus the blended water quality is expected to be suitable for irrigation on site.

L4-11 The Tribe uses wind turbines for frost protection of the vineyards, and thus no supplemental water demand is anticipated for frost protection.

Although not specifically listed as demands for gardens, swimming pools and/or irrigated pastures, such demands are included in the 0.5 acres of low water use landscaping for Alternative A at 1.0 acre-feet per acre (or 0.5 AFY per 5-acre parcel) and are included in the 0.1 acre of low water use landscaping for Alternative B at 1.0 acre-feet per acre (or 0.1 AFY per 1 acre parcel). In reviewing existing neighboring parcels in the area, there are parcels with irrigated pastures, large lawn areas, and plentiful landscaping. However, there are also a number of existing homes with no irrigated pasture and minimal landscaping. The Tribe maintains that the projected outdoor water demands are a reasonable estimate of anticipated outdoor water demands.

Therefore, the EA does not underestimate total water demand for Alternatives A and B as there is no water demand for frost protection and all outdoor water demands were considered. The EA accurately estimates that Alternatives A and B would result in an increased water demand compared to existing conditions.

The Tribe revised the components proposed as Alternatives A and B and has adjusted water demands accordingly; refer to **General Response 3.1.9** for further details. The commenter's discussion of the Thirty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Sana Ynez River Water Conservation District 2012-2013 is noted; additional reference materials were consulted in preparation of the Final EA and are discussed in **General Response 3.1.9**. Additionally, refer to **General Response 3.1.9** regarding concerns that additional extractions associated with the Proposed Action will exacerbate overdraft conditions and how mitigation measures will ensure minimal impacts to off-site wells, including those owned and operated by the ID1.

L4-12 The commenter is correct that the hydrographs displayed in Figure 2-5 of Appendix C generally indicate declining water levels in the associated wells since the early to mid- 2000s, including the Well 32R1. Refer to the response to **Comment L4-08** regarding the reliability of the existing wells to support agricultural use on the project site.

L4-13 Given the topography of the project site, it is possible that some of the homes on the five-acre lots located near at the south boundary of the project site just north of Amour Ranch Road (the south side of Road 2 as shown on Figure 3-1 of Appendix C of the EA) may require individual sewage pumps. This will have no bearing on the recommended design of Alternatives A and B and wastewater requirements of Alternatives A and B. During detailed design of the selected alternative, site grades will be designed to promote as much gravity drainage as possible. Where infeasible, individual sewage lift stations will be provided for houses on those lots not able to discharge sewage by gravity.

L4-14 As previously discussed, the Tribe has withdrawn without prejudice the approved TCA; refer to **General Response 3.1.2** for further discussion. Therefore, additional consideration of

actions pursuant to the TCA in the cumulative analysis presented in the Final EA is not warranted.

L4-15 The BIA has the jurisdiction to take the project site into trust for the Tribe; refer to the response to **Comment L4-03** for further discussion. For comments related to the TCA, refer to **General Response 3.1.2**. The BIA has fully complied with NEPA in considering the Proposed Action and associated project alternatives; refer to **General Response 3.1.3** for further discussion.

Response to Comment Letter L5 – Cam Van Wingerden on behalf of Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is solely correspondence regarding submission of a comment letter from the County. The correspondence does not include comments on the Proposed Action or the EA.

Response to Comment Letter L6 – Cam Van Wingerden on behalf of Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it provides a duplicate of the correspondence provided as Comment Letter L5. Refer to **Response to Comment Letter L5**.

Response to Comment Letter L7 – Ryan A. Smith, Attorney for Santa Ynez River Water Conservation District, Improvement District No. 1

L7-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L7-02 Comment noted. Refer to **General Response 3.1.2** regarding the purpose and need of the trust acquisition given the withdrawal of the TCA. As stated in the comment, the Tribe withdrew without prejudice the TCA and requested that the BIA dismiss any appeals on the TCA without prejudice. In response to this request, the IBIA dismissed the appeals (Appendix Q of the Final EA). It was never necessary for the BIA to revoke its approval of the TCA. If any Indian tribe submits a tribal consolidation and acquisition plan to the BIA, the BIA will take all appropriate actions as dictated by federal law.

The commenter is correct that the original Camp 4 Fee-To-Trust application submitted by the Tribe is no longer accurate given the withdrawal of the TCA. Accordingly, the Tribe submitted a revised application to the BIA, as indicated by the BIA's release of a Notice of (Non-Gaming) Land Acquisition Application on November 19, 2013 identifying the vacation of the Tribe's TCA and submission of a revised application by the Tribe. The BIA has prepared a Final EA in part to reflect withdrawal of the TCA.

For comments related to the level of scrutiny given to the Proposed Action and project alternatives, refer to **General Response 3.1.2**. The EA is not fatally flawed as it was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and presents the BIA's "hard look" at the potential environmental impacts associated with the trust acquisition and proposed development by the Tribe.

L7-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to the response to **Comment L7-02** regarding the Tribe's trust acquisition. Accordingly, the notice meets the request by the commenter.

Response to Comment Letter L8 – Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter only provides comments on the fee-to-trust application associated with the EA.

Response to Comment Letter L9 – Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is regarding legal actions associated with the TCA.

Response to Comment Letter L10 – Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is regarding legal actions associated with the TCA.

Response to Comment Letter L11 – Gary M. Kvistad and Ryan A. Smith, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is regarding legal actions associated with the TCA.

Response to Comment Letter L12 – The City of Solvang Mayor Jim Richardson

L12-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L12-02 Comment noted. The language on page 36 of the Traffic Impact Study (TIS) (Appendix I to the Final EA) regarding the intersection at SR-246 and Alamo Pintado Road and the City of Solvang's construction of a modern roundabout has been removed. The traffic analysis

provided in Section 4.1.7, 4.2.7, and 4.4.7 of the EA did not assume the modern roundabout would be implemented; therefore, no changes to the EA are warranted.

L12-03 Commented noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter L13 – Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter L3. Refer to **Response to Comment Letter L3**.

Response to Comment Letter L14 – Gary M. Kvistad and Diane C. De Felice, Attorneys for Santa Ynez River Water Conservation District, Improvement District No. 1

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter L4. Refer to **Response to Comment Letter L4**.

Response to Comment Letter L15 – Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter L3. Refer to **Response to Comment Letter L3**.

Response to Comment Letter L16 – Santa Barbara County Executive Officer Chandra L. Wallar

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter L8. Refer to **Response to Comment Letter L8**.

Response to Comment Letter L17 – Ryan A. Smith, Attorney for Santa Ynez River Water Conservation District, Improvement District No. 1

L17-01 Comment noted.

L17-02 Comment noted. The language and issues raised in this comment are nearly identical to **Comment L7-02**; refer to the response to **Comment L7-02** for a discussion of the BIA's future actions regarding any future tribal consolidation and acquisition plans, the original and revised Camp 4 Fee-To-Trust applications, and a refute of a fatal flaw in the EA.

L17-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter L18 – Gary M. Kvistad, Attorney for Santa Ynez River Water Conservation District, Improvement District No. 1

L18-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

L18-02 Refer to **General Response 3.1.2** for a discussion of the TCA, including associated standards of review of the EA.

L18-03 Comment noted and a Final EA has been completed in response to comments received on the EA as well as the withdrawal of the TCA by the Tribe.

L18-04 and **L18-05**

Refer to **General Response 3.1.2** for a discussion of the overall purpose of the EA and the level of scrutiny given to the Proposed Action and project alternatives given the withdrawal of the TCA.

L18-06 The BIA will consider the Proposed Action and alternative as they are presented and evaluated in the Final EA. Refer to the response to **Comment L7-02** as the language and issues presented in this comment are very similar. For comments related to contacting the commenter, refer to **General Response 3.1.15**.

Response to Comment Letter L19 – Ryan A. Smith, Attorney for Santa Ynez River Water Conservation District, Improvement District No. 1

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter L17. Refer to **Response to Comment Letter L17**.

3.2.4 Private Citizens/Commercial Entities Comment Letters (P)

Response to Comment Letter P1 – Stand Up For California! Director Cheryl Schmit

P1-01 Comment noted.

P1-02 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P1-03 For comments related to requesting an extension of the comment period, refer to **General Response 3.1.1**. For comments related to the commenter's intentions, refer to **General Response 3.1.15**.

Response to Comment Letter P2 – Jonathan Paulson

P2-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P2-02 The City of Solvang is 2.43 square miles, which is equivalent to 1,555 acres (U.S. Census Bureau, 2014). Therefore, the project site is smaller than the City of Solvang as the project site is 1,433 acres. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P2-03 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P2-04 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P2-05 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P3 through P7

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P8 – Pamela Zwehl-Burke

P8-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P9 and P10

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P11 – Nancy Englander

P11-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P11-02 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P11-03 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P11-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P12 and P13

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P14 – Beth and E.A. Horvath

P14-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P14-02 Refer to the response to **Comment P2-02** regarding the size of the project site compared to the City of Solvang. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P14-03 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P14-04 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P14-05 Comment noted. Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe. Potential impacts to water supply are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. Potential impacts to land use and agriculture are addressed in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts to land use and agriculture would occur. For comments related to requests to extend the comment period on the EA, refer to **General Response 3.1.1**.

P14-06 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P15 through P18

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P19 – Mike Shuler

P19-01 Comment noted.

P19-02 Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe. Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

P19-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P19-04 Potential impacts of project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. The analysis includes potential impacts to water supply, which are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and to roads, which are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA. Adverse impacts to water supply and roads would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.7, respectively, of the EA. Refer to the response to **Comment L4-03** for further discussion regarding the U.S. Department of the Interior's recognition of the Tribe.

P19-05 Comment noted. Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe. If the Proposed Action is approved and the project site is taken in to trust for the Tribe, the Tribe would not be required to pay County property taxes on the project site because the project site would no longer be within the jurisdiction of the County. Refer to **General Response 3.1.5** for further discussion of the purpose of the trust acquisition. That being said, the Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. The Tribe would still be required to pay other taxes as applicable. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letters P20 through P22

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P23 – Tim Gorham

P23-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Potential impacts of project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. The analysis includes potential impacts to water supply, which are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and to traffic, which are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA. Adverse impacts to water supply and traffic would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.7, respectively, of the EA.

P23-02 Comment noted. The Tribe's existing Chumash Casino Resort, gas station, and other development projects, and impacts associated with these entities, constitute the baseline condition of the existing environment and are addressed where relevant in the baseline discussion within Section 3.0 of the EA; refer to **General Response 3.1.4** for further discussion regarding the baseline condition.

P23-03 Comment noted. Potential impacts of the Proposed Action and project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.10** regarding the impact to land use and applicability of County development restrictions, and refer to **General Response 3.1.5** regarding the preference of the fee-to-trust process compared to development per the County land use approval process. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P24 – Bill Krauch

P24-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P24-02 Refer to the response to **Comment P2-02** regarding the size of the project site compared to the City of Solvang. Potential impacts of the Proposed Action and project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts

would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P24-03 Refer to **General Response 3.1.2** regarding the TCA.

P24-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P25 – Kyle Abello

P25-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P25-02 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P25-03 Refer to the response to **Comment P2-02** regarding the size of the project site compared to the City of Solvang. For comments regarding requests to extend the comment period on the EA, refer to **General Response 3.1.1**. For comments related to the impacts of the TCA, refer to **General Response 3.1.2**.

P25-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P26 – Caryn Cantella

P26-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Potential impacts of the Proposed Action and project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P26-02 Refer to **General Response 3.1.2** regarding impacts of the TCA.

P26-03 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P27 – Mary Conway

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P28 – Neal Abello

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P25. Refer to **Response to Comment Letter P25**.

Response to Comment Letter P29 – Virginia Burroughs

P29-01 Comment noted.

P29-02 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the impacts of the TCA.

P29-03 Comment noted. The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. With mitigation measures included in Section 5.0 of the EA, adverse impacts would be reduced or avoided.

P29-04 Comment noted. Refer to **General Response 3.1.12** regarding the regulation of future land use.

P29-05 Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

P29-06 Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P30 – Michelle de Werd

P30-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the impacts of the TCA.

P30-02 Comment noted. Potential impacts to water are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to public service, including schools and public safety, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Refer to **General Response 3.1.2** regarding the impacts of the TCA.

P30-03 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P30-04 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P31 – Linda and Sid Kastner

P31-01 Comment noted.

P31-02 and **P31-03**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P32 – Mary Jane Edalatpour

P32-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P33 – Robert P. and Ann Tucker

P33-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.10** for a discussion of the compatibility of the project alternatives with the Santa Ynez Valley Community Plan (SYVCP).

P33-02 Comment noted. Potential impacts to public services; including police, fire, emergency agencies and services, and loss of tax monies that support these services; are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to water are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to socioeconomic conditions and environmental justice (including local businesses) are addressed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA; as discussed therein, no adverse impacts would occur. Refer to **General Response 3.1.11** regarding lost tax revenue and support of public services.

P33-03 Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe.

P33-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P34 – Mary Jane West-Delgardo

P34-01 and **P34-02**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P34-03 through **P34-09**

Refer to **General Response 3.1.2** regarding the TCA. As the TCA has been withdrawn, comments related to the TCA are moot.

Response to Comment Letter P35 – Prince Lionheart, Inc. CEO Kelly McConnell

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letters P36 and P37

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P38 – Robert Walton

P38-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P38-02 Refer to **General Response 3.1.2** regarding the TCA.

P38-03 Comment noted. Refer to **General Response 3.1.5** regarding the purpose of the proposed trust acquisition and project alternatives. Refer to **General Response 3.1.12** regarding future oversight of the project site. Additionally, if the project site is placed into trust for the Tribe, the state and County would no longer have jurisdiction over the property and County property taxes would not be applicable. That being said, the Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion.

P38-04 through **P38-07**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA. Currently, the Tribe owns the project site in fee.

P38-08 through **P38-15**

The comments are nearly identical to that of Comment Letter P34. Refer to **Response to Comment Letter P34**.

P38-16 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letters P39 and P40

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P41 – Jordan Mo and Janet I. Hines

P41-01 through **P41-03**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P41-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P42 – Susie Snow, Pat Wall and Jean Wall

P42-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P42-02 and **P42-03**

Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process.

P42-04 and **P42-05**

Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P43 – Kenneth Karas

P43-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P44 – Ann Janis

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P45 – Kelly and Sandy Rose

P45-01 Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P45-02 Comment noted.

P45-03 Refer to **General Response 3.1.2** regarding the TCA. For comments related to future development on the project site if the land is taken into trust, refer to **General Response 3.1.12**. For comments related to the applicability of existing land use policies and plans, refer to **General Response 3.1.10**.

P45-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P46 – Lynn North

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P47 – Wendy Eisler

P47-01 and **P47-02**

Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P47-03 Refer to **General Response 3.1.2** regarding the TCA.

P47-04 Refer to the response to **Comment P2-02** regarding the size of the project site compared to the City of Solvang. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P47-05 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

Response to Comment Letter P48 – Harold McHugh

P48-01 The public comment period for the EA, which considers the Proposed Action of transferring the project site to trust status, began on August 20, 2013 and ended on November 18, 2013; refer to **General Response 3.1.1** for further discussion.

P48-02 Comment noted. It is unclear why the commenter believes the Proposed Action and project alternatives would impact the property rights of people residing in the Santa Ynez Valley. Refer to **General Response 3.1.5** for a discussion of the trust acquisition process.

P48-03 Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort.

P48-04 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P48-05 In response to comments received on the EA, a Final EA has been prepared. The responses to comments received and the Final EA provide sufficient analysis to support the conclusion that the Proposed Action would not have a significant impact on the quality of the human environment. The BIA may make its decision regarding the Proposed Action following the release of the Final EA.

Response to Comment Letter P49 – Gary Waples

P49-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P49-02 It is assumed the commenter is referring to the public comment period for the EA; refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P49-03 Comment noted.

P49-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P50 – Heather Elliott

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P51 – Jon Quirt

P51-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P51-02 and **P51-03**

Comments noted. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P52 – Tami and Denison Bollay

P52-01 and **P52-02**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P52-03 through **P52-10**

The comments are nearly identical to that of Comment Letter P34. Refer to **Response to Comment Letter P34**.

P52-11 Comment noted. The parcels proposed for trust acquisition are owned in fee by the Tribe; therefore the Proposed Action would not constitute the taking of a private property.

Response to Comment Letter P53 – George Newbern

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letters P54 through P60

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P61 – Scott and Claudia Matthews

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P62 – Steve and Bonnie Bollinger

P62-01and **P62-02** Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letters P63 through P67

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P68 – Mark Rick

P68-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P68-02 Comment noted. Refer to **General Response 3.1.11** regarding removing the project site from the County tax roll. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site if the land is taken into trust.

Response to Comment Letter P69 – Carol Ann Herrera with Vista Verde Ranch

P69-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P69-02 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P69-03 Comment noted. Refer to **General Response 3.1.5** regarding the trust acquisition process. Community land use policies relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to community land use policies are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA. As discussed in Section 4.1.8, there would be no adverse impacts related to community land use policies because the Proposed Action would not result in the inability of the County to continue to implement existing land use policies. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion. Refer to **General Response 3.1.2** regarding the TCA.

P69-04 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P69-05 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P70 – Lee and George Weir

P70-01 and **P70-02**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P70-03 Refer to **General Response 3.1.2** regarding the TCA.

P70-04 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.5** for a discussion of the Tribe's purpose and need for the Proposed Action and project alternatives.

P70-05 Comment noted. Refer to **General Response 3.1.5** regarding the purpose of the proposed trust acquisition and project alternatives.

P70-06 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P70-07 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P71 – Steve Raftopoulos

P71-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P71-02 and **P71-03**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P71-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P72 – Patrick and Lucy McCarthy

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P73 – John H. Werden

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P74 – Nancy and David Hunsicker

P74-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P74-02 through **P74-09**

The comments are nearly identical to that of Comment Letter P34. Refer to **Response to Comment Letter P34**.

P74-10 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P74-11 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P75 – Michele Hinnrichs

P75-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P75-02 Comment noted.

P75-03 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P75-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.15** to the commenter's intentions.

Response to Comment Letter P76 – Shirley DiCroce

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P77 – Gerry B. Shepherd

P77-01 Comment noted. The commenter is correct that the EA addresses several environmental resources; including land use, water resources, and air quality; and considers community plans as they relate to the Proposed Action and project alternatives. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P78 and P79

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P80 – Jeanne Hollingsworth

P80-01 Comment noted. It is unclear what is meant by the commenter's request to "please extend the 1,400 acre application." It is assumed the commenter is referring to the comment period on the EA; refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe.

P80-02 Comment noted. The trust acquisition process is codified in 25 CFR 151 and outlines the process for the federal government to take land into trust on behalf of a tribe (or tribal member) for the purpose of establishing land bases for tribes to support their sovereign right to self-governance; refer to **General Response 3.1.5** for further discussion. Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe.

P80-03 Comment noted. Refer to **General Response 3.1.5** regarding the trust acquisition process. As discussed in Section 1.3 of the EA, the Tribe has a population of 136 tribal members and approximately 1,300 lineal descendants.

P80-04 Refer to **General Response 3.1.5** regarding the purpose of the trust acquisition process. It is unclear why the commenter thinks the population of the Santa Ynez Valley is relevant to the Proposed Action and therefore difficult to provide a response to the commenter's concerns. It is also unclear what source the commenter used to determine the current (2013) population is 24,000 in the Santa Ynez Valley or what source the commenter used to determine the zoning in the Santa Ynez Valley would not allow the population to exceed 28,000.

Per the SYVCP (Santa Barbara County, 2009a), the population of the SYVCP area (which includes all unincorporated areas within the Santa Ynez Valley) was approximately 9,900 people in 2000. Including the incorporated towns of Buelton (population of approximately 3,800 in 2000; Department of Finance, 2012) and Solvang (population of approximately 5,300 in 2000; Department of Finance, 2012), the total population in the Santa Ynez Valley 13 years ago was approximately 19,000. Assuming the average annual growth rate in the Santa Ynez Valley was similar to other unincorporated areas in the County from 2000 through 2010 (-1.8 percent; Department of Finance, 2012) and from 2011 through 2013 (0.3 percent; Department of Finance, 2013), the unincorporated population in the Santa Ynez Valley was approximately 8,200 people in 2013. Including the populations of Buelton (approximately 4,900 in 2013; Department of Finance, 2013) and Solvang (approximately 5,300 in 2013; Department of Finance, 2013), the population in 2013 was approximately 18,400 in the Santa Ynez Valley. Therefore, in the last 13 years, the population in the Santa Ynez Valley has decreased slightly.

P80-05 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letters P81 through P83

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P84 – Sheila Benedict

P84-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P84-02 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P84-03 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P84-04 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P85 – Klaus and Lois Brown

P85-01 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P85-02 through **P85-09**

The comments are nearly identical to that of Comment Letter P34. Refer to **Response to Comment Letter P34**.

P85-10 The commenter is correct that the EA addresses several environmental resources, including land and water resources, land use, air quality, federally-listed wildlife, transportation, and cultural resources. The existing settings of these resources are discussed in Section 3.0 of the EA, and the potential impacts to these resources are discussed throughout Section 4.0 of the EA. With implementation of the mitigation measures identified in Section 5.0, adverse impacts to land and water resources, air quality, federally-listed wildlife, transportation, and cultural resources would be reduced or avoided.

P85-11 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letters P86 and P87

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P88 – Preservation of Los Olivos (P.O.L.O) Board President Kathy Cleary

P88-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P88-02 Comment noted. It is assumed that the commenter is referring to the Santa Barbara County Comprehensive Plan when mentioning the Santa Barbara County Master Plan. Elements of the Santa Barbara County Comprehensive Plan and SYVCP relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the

Proposed Action and project alternatives related to the Santa Barbara County Comprehensive Plan and SYVCP are evaluated throughout Section 4.0 of the EA.

P88-03 and **P88-04**

Comments noted. Potential impacts to transportation infrastructure are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to water are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to the response to **Comment P88-02** regarding the consideration of the Santa Barbara County Comprehensive Plan and SYVCP.

P88-05 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P88-06 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P88-07 Refer to **General Response 3.1.12** regarding regulation of future land use.

P88-08 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P89 – Susie Snow

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P90 – Maria Costa

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P91 through P95

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P96 – Alice Olla

P96-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P97 – Kathleen L. Ealand

P97-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P98 – Rich Nagler

P98-01 It is unclear what the commenter is referring to. Assuming the commenter is referring to more time needed to review the EA, refer to **General Response 3.1.1**.

Response to Comment Letter P99 – Susan M. Brooks

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P100 – Cherie Rivas

P100-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P101 – Brad Ross

P101-01 Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process.

Response to Comment Letter P102 – Louis Friedman

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P103 – Susan Vasek

P103-01 Request noted. The Final EA, including the responses to comments received on the EA, completes the BIA's review of the Proposed Action pursuant to the BIA NEPA Guidebook; refer to **General Response 3.1.3** for further discussion.

P103-02 Comment noted. Impacts of the Proposed Action to environmental resources, including those within the surrounding community, are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letters P104 through P108

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P109 – Steve Wood

P109-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P110 – Diane Petras

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P111 – Virginia Cooper

P111-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P111-02 Comment noted. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process. Potential impacts of the Proposed Action to local infrastructure are analyzed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; refer to **General Response 3.1.11** for further discussion.

Response to Comment Letter P112 – Stanley Freedman

P112-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P112-02 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P112-03 If the Proposed Action is approved and the project site is taken into trust for the Tribe, the Tribe would not be required to pay County property taxes on the project. Refer to **General Response 3.1.5** for further discussion of the purpose of the trust acquisition process. That

being said, the Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P112-04 Comment noted. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Refer to **General Response 3.1.14** for further discussion. Refer to the response to **Comment P112-03** regarding County tax rolls and regulation of future development. Potential impacts of the Proposed Action to environmental resources available to and used by other citizens of Santa Ynez and the County are analyzed throughout Section 4.0 of the EA. With implementation of mitigation measures identified in Section 5.0 of the EA, adverse impacts would be reduced or avoided.

P112-05 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P113 – Stanley Freedman

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter P112. Refer to **Response to Comment Letter P112**.

Response to Comment Letter P114 – Dr. Virgil Elings

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P115 – Marguerite LePley

P115-01 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P115-02 Comment noted. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Refer to **General Response 3.1.14** for further discussion. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P116 – Mary Lloyd Mills

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P117 – Natalie Kaplan

P117-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P118 – Patricia P. Murphy

P118-01 Comment noted. Potential impacts to public services are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts to traffic and transportation are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to water are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to socioeconomic conditions and environmental justice are addressed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA; as discussed therein, no adverse impacts related to socioeconomic conditions and environmental justice would occur with implementation of the Proposed Action.

P118-02 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P119 – Mary Ann Sampson

P119-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P119-02 Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

P119-03 The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process.

P119-04 through **P119-08**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P120 – Karin Roser

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P121 – David and Nancy Wyatt

P121-01 Commented noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P122 through P125

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P126 – Dr. James and Nadine Riley

P126-01 Commented noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P127 and P128

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P129 – Jeanne Hollingsworth

P129-01 The commenter's intent is unclear as the BIA cannot request an extension for the comment period on the EA. It is assumed the commenter intended to request an extension for the comment period on the EA; refer to **General Response 3.1.1**.

P129-02 Comment noted. The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. With mitigation measures included in Section 5.0 of the EA, adverse impacts would be reduced or avoided.

P129-03 Refer to **General Response 3.1.2** regarding the TCA. Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe.

P129-04 Comment noted. Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

P129-05 The potential impacts of the Proposed Action and project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Socioeconomic impacts are evaluated in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA; as stated therein, no adverse impacts were identified. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P130 through P134

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P135 – Sybil K. Cline

P135-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P135-02 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P136 – Eric Durst

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P137 – Ethel Larrabee

P137-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P138 through P145

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P146 – Gerald Schroeder

P146-01 Comment noted. As assessed in the Final EA, Alternative A includes approximately 431 acres of open space (300 acres of open space and 131 acres preserved as a resource

management zones). Alternative B includes approximately 1,000 acres of open space (869 acres of open space and 131 acres preserved as a resource management zones). Refer to **General Response 3.1.9** regarding revisions to the vineyard and open space acreage under Alternatives A and B. Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort. Potential impacts of the Proposed Action and project alternatives to environmental resources are addressed in Section 4.0 of the EA, which includes consideration of the Santa Barbara County Comprehensive Plan and SYVCP.

P146-02 through **P146-06**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P147 – Kathleen Heringer

P147-01 and **P147-02**

Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P147-03 through **P147-06**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P148 – William Heringer, MD

P148-01 and **P148-02**

Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P148-03 through **P148-06**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P149 – Allen M. Segal

P149-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P149-02 Refer to the response to **Comment L3-18** regarding the insignificant percentage of farmland that would be converted to other land uses under Alternatives A and B.

P149-03 Comment noted. Potential impacts of the Proposed Action and project alternatives to environmental resources, including agricultural resources, are addressed in Sections 4.1.8,

4.2.8, 4.3.8, and 4.4.8 of the EA. As discussed therein, no adverse impacts to agricultural resources would result from implementation of the Proposed Action and project alternatives.

P149-04 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P150 and P151

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P152 – Lindalee Baumgarten

P152-01 Refer to **General Response 3.1.5** regarding the purpose of the trust acquisition process.

P152-02 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P152-03 Refer to **General Response 3.1.5** regarding the Tribe's purpose and need for the Proposed Action. If the Proposed Action is approved and the project site is taken in to trust for the Tribe, local land use policies and guidelines would no longer apply.

P152-04 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P152-05 Refer to **General Response 3.1.5** for a discussion as to the purpose of the fee-to-trust process and the rationale as to why the Tribe can request a property be transferred from fee title to trust status. Additionally, refer to **General Response 3.1.5** for a discussion of the Tribe's purpose and need for the Proposed Action.

P152-06 Refer to **General Response 3.1.5** regarding the purpose of the Proposed Action and project alternatives. The Tribe has no plans to develop a casino on the project site, and future development on the project site, if it were taken in to trust, would be governed by the Tribe with oversight provided by applicable federal agencies; refer to **General Response 3.1.12** for further discussion.

P152-07 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P152-08 As noted in Section 3.8 of the EA, the project site as it currently exists is compatible with local land use policies. If the Proposed Action is approved and the project site is taken in to

trust for the Tribe, local land use policies would no longer be applicable. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P152-09 Comment noted.

P152-10 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.5** regarding the purpose and need of the trust acquisition and proposed housing development.

P152-11 Comment noted. Refer to the response to **Comment L4-03** regarding the laws that govern trust acquisition.

Response to Comment Letter P153 – CNC Machining, Inc. CEO Greg Brous

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P154 – Wendy Wegeles

P154-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P155 – Don Sheldon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P156 – Belinda Hart

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P34. Refer to **Response to Comment Letter P34**.

Response to Comment Letter P157 – Kerry Perez

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P158 – Andriette Culbertson

P158-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P158-02 Refer to **General Response 3.1.13** regarding the appropriateness of the alternatives selected for full analysis in the EA. The potential impacts associated with the selected alternatives are evaluated in Section 4.0, including the cumulative impacts and growth-inducing effects. Sections 2.0 and 4.0 of the EA are prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and provide sufficient analysis to allow the lead agency to make an informed decision. Refer to **General Response 3.1.3** for further discussion.

P158-03 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P158-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P159 – Ann Young

P159-01 and **P159-02**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P160 – Peter Van Iderstine

P160-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P160-02 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P161 – Kelli Pappas

P161-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P162 – John H. Harmon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P163 – D.B.

P163-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P163-02 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P163-03 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P164 – Linda and Sid Kastner

P164-01 and **P164-02**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P164-03 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P164-04 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P165 – William L. Jackson

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P166 – Wendall B. Shepherd

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P1. Refer to **Response to Comment Letter P1**.

Response to Comment Letter P167 – R. Busby

P167-01 Although the commenter does not mention the EA and only mentions the fee-to-trust application, it is assumed the commenter is requesting an extension to the comment period on the EA given that the commenter references the original end-date of the EA public comment period; refer to **General Response 3.1.1**.

P167-02 Comment noted.

P167-03 and **P167-04**

Comments noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P168 – Donna and Patrick Will

P168-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P168-02 Refer to the response to **Comment P2-02** regarding the size of the project site compared to the City of Solvang. Refer to **General Response 3.1.5** regarding the regulations that govern the fee-to-trust process.

P168-03 Refer to **General Response 3.1.2** regarding the TCA.

P168-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P168-05 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P169 – Christine Beebe

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P170 – James Victor

P170-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P170-02 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P171 – Melinda Jensen

P171-01 and **P171-02**

Comments noted. The existing land use zoning for the project site is presented in Section 3.8 of the EA, and analysis of the potential impacts of the Proposed Action and project alternatives that could result from land use conflicts or incompatible land uses is provided in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA. As discussed therein, no adverse impacts to land use would result from implementation of the Proposed Action and project alternatives. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P171-03 Refer to **General Response 3.1.14** regarding the potential impacts to scenic highways.

P171-04 Comment noted. Potential impacts to visual resources, including scenic highways, are evaluated in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA; adverse impacts to visual resources would be reduced or avoided with implementation of the protective measures and BMPs identified in Section 2.2.10 of the EA. Potential impacts to land use, including agriculture, are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts would result from implementation of the Proposed Action.

Potential impacts to water are evaluated in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA.

Response to Comment Letters P172 through P175

These comment letters are included in **Table 2-1** in **Section 2.0** as they are a part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P176 – Board of Directors Neighborhood Defense League President Judith Ishkanian

P176-01 Comment noted.

P176-02 Refer to **General Response 3.1.2** regarding the TCA. As the TCA has been withdrawn, comments related to the TCA are moot.

P176-03 Comment noted.

P176-04 Refer to **General Response 3.1.2** regarding the TCA.

P176-05 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P177 – David Norcott

P177-01 It is unclear what 10,000 acres being considered for fee-to-trust acquisition the commenter is referring to. As discussed in Section 1.0 of the EA, the Tribe is proposing a trust acquisition of the land known as "Camp 4" (project site), which includes approximately 1,433 acres. Presently, the Tribe owns the project site in fee, and there are no private residences located on the project site. If the commenter is referring to the TCA, the TCA has been withdrawn; refer to **General Response 3.1.2** for further discussion.

P177-02 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P177-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P177-04 Comment noted. The purpose of the trust acquisition process is to establish land bases for Tribes to support their sovereign right to self-governance; refer to **General Response 3.1.5** for further discussion. Section 4.0 of the EA evaluates the impact of the Proposed Action to

environmental resources available to and used by the residents and taxpayers of the County and the Santa Ynez Valley. The mitigation included in Section 5.0 of the EA reduces adverse impacts to a minimal level such that the Proposed Action would not have a significant impact on the quality of the human environment.

P177-05 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P177-06 through **P177-10**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P178 – Fred Kovol

P178-01 through **P178-05**

The comments are nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

P178-06 A Water and Wastewater Feasibility Analysis was prepared to analyze the potential impacts of Alternatives A and B on water resources (Appendix C to the EA). As indicated in the References section of Appendix C to the Final EA (page R-1), the 2008 Santa Barbara County Groundwater Report was consulted during the analysis. The 2011 Santa Barbara County Groundwater Report was released on May 1, 2012, which was four days after the Water and Wastewater Feasibility Analysis was completed on April 27, 2012. The Final EA has been updated to include data from the 2011 Santa Barbara County Groundwater Report. The Santa Ynez Valley Community Plan Final Environmental Impact Report (Santa Barbara County, 2009b), which compiled information from the Santa Ynez River Water Conservation District, Improvement District #1 (ID1) reports, was also consulted during development of the Water and Wastewater Feasibility Analysis (References section of Appendix C to the EA). Additionally, the Tribe conducted field well pumping and water quality tests in January and February 2014 to provide more recent data of the capacities and water quality of the existing groundwater wells on the project site (Appendix C to the Final EA). Refer to **General Response 3.1.9** for further discussion.

Presently, there are three active groundwater wells on the project site, and the Tribe proposes to add two additional wells if the Proposed Action is approved. The Tribe will discuss with the ID1 the possibility of monitoring on-site wells if the Proposed Action is approved. Regardless, there are several other wells located near the project site (Figure 2-2 of Appendix C of the EA) that could be monitored by the ID1 to ascertain the overall health of the Santa Ynez Uplands Groundwater Basin (Uplands Basin).

Response to Comment Letter P179 – Chuck and Laura Evans

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P180 – Gregory Schipper

P180-01 and **P180-02**

Comments noted.

P180-03 A casino is not part of the project alternatives; refer to **General Response 3.1.12** for further discussion.

P180-04 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P180-05 Comment noted.

Response to Comment Letter P181 – Elizabeth Knowlton

P181-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA. Refer to **General Response 3.1.2** regarding the TCA.

P181-02 Comment noted. Potential impacts of the Proposed Action and project alternatives to environmental resources are addressed throughout Section 4.0 of the EA, which includes consideration of the SYVCP.

P181-03 Comment noted. Potential impacts to public services are evaluated in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.9 of the EA. Potential impacts to traffic and transportation are evaluated in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.7 of the EA. Potential impacts to land use are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts would result from implementation of the Proposed Action. Potential impacts to water are evaluated in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to visual resources are evaluated in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA; adverse impacts to visual resources would be reduced or avoided with implementation of the protective measures and BMPs identified in Section 2.2.10 of the EA. Development of 143 residential units on

the 1,433-acre project site is not anticipated to affect property values in the area. Socioeconomic impacts are analyzed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. For comments related to a loss of property taxes if the project site is taken into trust, refer to **General Response 3.1.11**.

P181-04 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA.

P181-05 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P182 – Jim Kelley

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P183 – Thoma Martinov

P183-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letters P184 through P188

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P189 – Sheridan Force

P189-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P189-02 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P189-03 Comment noted. Evaluation of the trust acquisition program is beyond the scope of the EA. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process.

P189-04 Comment noted. Evaluation of the function of the BIA is beyond the scope of the EA.

P189-05 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P190 – William Otto

P190-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P190-02 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P190-03 It is unclear what is meant by the commenter's reference to "FTA" as that acronym is not used anywhere in the EA and is not defined in the commenter's letter. Assuming the commenter is referring to the fee trust acquisition, the potential impacts of the Proposed Action to environmental resources are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0. Refer to **General Response 3.1.2** regarding the TCA.

P190-04 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P191 – Gerald Rounds

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P192 – Kelly and Sandy Rose

P192-01 Comment noted. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P192-02 The comment is identical to Comment Letter P45. Refer to the **Response to Comment Letter P45**.

Response to Comment Letter P193 – Denise C. Schipper

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P194 – Anne Crawford-Hall

P194-01 Comment noted.

P194-02 and **P194-03**

Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P194-04 Comment noted. Potential impacts to groundwater are evaluated in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.2 of the EA. Potential impacts to adjacent land use, including agriculture, are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts would result from implementation of the Proposed Action.

P194-05 Comment noted.

Response to Comment Letters P195 and P196

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P2. Refer to **Response to Comment Letter P2**.

Response to Comment Letter P197 – Jerry and Clarire Shoemaker

P197-01 Comment noted. The TCA has been withdrawn, and therefore the wells and water storage facilities referenced in the comment are no longer within the TCA. Refer to **General Response 3.1.2** for further discussion.

P197-02 Refer to **General Response 3.1.2** regarding the TCA. Section 4.0 of the EA addresses the potential impacts of the Proposed Action and project alternatives to environmental resources, including visual resources, public services, and conflicts with local plans. The Final EA, including the responses to public comments received on the EA, provides sufficient analysis to support the conclusion that the Proposed Action would not have a significant impact on the quality of the human environment. If the Proposed Action is approved and the project site is taken in to trust for the Tribe, the project site would no longer be within the jurisdiction of the County or State and would therefore no longer be subject to local control or property taxes. The Tribe, with applicable oversight from the federal government, would regulate future development on the site; refer to **General Response 3.1.12** for further discussion. Additionally, the Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. The Tribe would still be required to pay other taxes as applicable. Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

P197-03 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P198 through P205

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P197. Refer to **Response to Comment Letter P197**.

Response to Comment Letter P206 – Robert B. Field, President on behalf of Board of Directors Santa Ynez Rancho Estates Mutual Water Company, Inc.

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P197. Refer to **Response to Comment Letter P197**.

Response to Comment Letter P207 – Kelly Gray

P207-01 through **P207-04**

Comments noted. Refer to **General Response 3.1.13** regarding the evidence supporting the conclusions that the EA both considers an appropriate range of alternatives and considers alternatives representative of all concept plans proposed for the project site. Refer to **General Response 3.1.2** regarding the TCA.

P207-05 The Final EA and entire NEPA record provide adequate analysis to provide for the BIA's hard look at the Proposed Action's environmental impacts. All work in developing the EA, Final EA, and NEPA record was conducted under the direction of the BIA. Based on the EA, response to comments, and the Final EA, the BIA will determine if the Proposed Action would adversely impact the environment and an Environmental Impact Statement (EIS) would therefore be required or if adequate information is presented to develop a Finding of No Significant Impact (FONSI). The BIA may also direct further investigation prior to a decision to move forward with an EIS or FONSI.

P207-06 As discussed in Section 4.1.2, if the project site is taken in trust, the Tribe would be required to comply with the Clean Water Act with oversight provided by the U.S. Environmental Protection Agency (USEPA). Furthermore, the WWTP would be designed to ensure recycled water meets the same requirements as California Code of Regulations, Title 22, which is indicative of water quality that is acceptable for irrigation of agricultural crops, including edible crops. As shown in Appendix C of the EA, wastewater would be treated using a tertiary treatment process, including disinfection (such as the use of ultraviolet light or chemical disinfectants), ensuring that the final effluent meets the requirements of effluent for unrestricted use. With the design of the WWTP to meet California Code of Regulations, Title

22 requirements for recycled water production, impacts to the groundwater table would be minimal. The Tribe has operated a WWTP on its Reservation since 2004 under NPDES Permit No. CA0050008. There have been no violations of this permit since the WWTP came online, thereby demonstrating the Tribe's ability to operate a WWTP in accordance with environmental protection laws.

P207-07 Refer to **General Response 3.1.4** regarding the future use of the project site for gaming purposes.

P207-08 Refer to **General Response 3.11.1** regarding impact to public services, including law enforcement and fire protection, and removal of the project site from the County's tax base.

P207-09 Increases in water demand as a result of the implementation of Alternatives A and B are described in Section 2.2.5, Appendix C, and Sections 4.1.2 and 4.2.2 of the EA. Impacts to the regional groundwater basin are described in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA. Section 2.0, 3.0, and 4.0 have been updated to expand the discussion of impacts to groundwater resources and additional project design features and mitigation measures have been included within Section 2.0 and 5.0 of the Final EA to address drought conditions. Refer to **General Response 3.1.9** regarding groundwater use associated with the Proposed Action and updated water demand estimates presented in the Final EA given the revisions to the vineyard development plans under Alternatives A and B.

P207-10 Transportation and circulation are addressed in Section 3.7 (baseline conditions) of the EA, and impacts associated with an increase in traffic generated by Alternatives A and B are addressed in Sections 4.1.7, 4.2.7, and 4.4.7 of the EA. A Traffic Impact Study (TIS) was conducted to assess the existing conditions of the transportation network and assess associated impacts from Alternatives A and B. The TIS is included as revised Appendix I to the Final EA as it contains updated traffic data given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, and the results are incorporated into the above-mentioned sections of the EA. Section 2.0 of the EA provides a description of the proposed alternatives under consideration by the Tribe should the project site be taken into trust. Refer to **General Response 3.1.12** regarding development of the Proposed Alternatives.

P207-11 The commenter is referencing a project design feature incorporated into Alternatives A and B as a Protective Measure and BMP. These are provisions that are incorporated into the project design to reduce impacts to wetlands and oak trees to the extent feasible. Impacts to these resources as assessed in Sections 4.1.4, 4.2.4, and 4.4.4 of the EA, which take into consideration the Protective Measure and BMPs presented in Section 2.0. However, even with these measures, the impact analyses within Sections 4.1.4, 4.2.4, and 4.4.4 indicate that without mitigation, an adverse impact to wetlands and oak trees would result from the

implementation of Alternatives A and B. As stated in Sections 4.1.4 and 4.2.4 the EA, implementation of Alternatives A and B could impact 0.15 acre and 0.01 acre, respectively, of seasonal wetlands and seasonal wetland swales located within the project site (refer to Tables 4-3 and 4-12 of the EA). A Biological Assessment (2013 EA Appendix E) has been prepared and has been submitted to the USFWS pursuant to Section 7 of the FESA (Appendix R of the Final EA). Sections 4.1.4, 4.2.4, and 5.4 of the Final EA have been updated to incorporate the mitigation included in the Biological Assessment, which includes avoiding development within the seasonal wetlands and seasonal wetland swales on the project site; refer to **General Response 3.1.7** for further discussion regarding impacts to wetlands. Even with the protective measures and BMPs for oak trees incorporated into project design, implementation of Alternatives A and B would also adversely affect oak trees protected under the Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians (Oak Tree Ordinance) (Santa Ynez Band of Chumash Indians, 2000) through removal of up to 70 oak trees within the project site. The measures listed under Section 5.4 of the EA would mitigate for adverse affects to protected oak trees. Refer to **General Response 3.1.16** regarding further discussion of impacts to oak trees and oak habitat.

P207-12 Refer to **General Response 3.1.17** regarding impacts associated with tribal facilities and the revisions to the planned tribal facilities assessed within the Final EA. Refer to **General Response 3.1.10** regarding land use authority once the project site is taken into trust.

P207-13 Comment noted. Potential impacts to biological resources are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and mitigation measures are presented in Section 5.4 that would reduce identified impacts to a minimal level.

P207-14 Socioeconomic conditions and impacts associated with Alternatives A and B are addressed in Sections 4.1.6, 4.2.6, and 4.4.6 of the EA. In accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, the project alternatives were assessed to determine if implementation would result in adverse effects related to socioeconomic and environmental justice. Significance criteria to determine if an adverse effect would occur with implementation of the project alternatives are listed in Section 4.1.6 of the EA.

Under this methodology, the analysis within the EA provides the "hard look" required to assess the environment impacts of the Proposed Action under NEPA. Given the analysis presented in Sections 4.1.6, 4.2.6, and 4.4.6 of the EA, no adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative.

P207-15 Comment noted. Refer to **General Response 3.1.10** regarding incompatibility with existing local planning documents.

P207-16 Comment noted. Impacts of the Proposed Action are assessed in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Refer to the response to **Comment P207-05** regarding the BIA's involvement with the preparation of the EA.

P207-17 Comment noted. Refer to the response to **Comment P207-05** regarding the BIA's involvement with the preparation of the EA.

Response to Comment Letter P208 – Jane Quigley

P208-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P208-02 Comment noted. Public services including law enforcement are addressed in Sections 3.10, 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as stated therein, no adverse impacts would occur with implementation of the project alternatives. Transportation and circulation are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA. A TIS was conducted to assess the existing conditions of the transportation network and assess associated impacts from Alternatives A and B. The TIS is included as revised Appendix I to the Final EA as it contains updated traffic data given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, and the results are incorporated into the above-mentioned sections of the EA. With the implementation of mitigation identified in Section 5.7 of the EA, impacts would be minimal.

P208-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P208-04 The commenter is incorrect that the Tribe does not pay for water. The Tribe currently contracts with ID-1 for water at the existing Reservation. Refer to **General Response 3.1.9** regarding impacts to groundwater supplies.

P208-05 In accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook a comment period was made available for the community to express their concern. Refer to **General Response 3.1.1** regarding the public comment period. As noted in Section 4.0 of the EA, identified impacts would be mitigated to minimal levels and implementation of the Proposed Action would not result in a significant impact on the environment.

Response to Comment Letter P209 – Edward Quigley

P209-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P209-02 through **P209-06**

These comments are nearly identical to those under **Comment Letter P208**. Refer to the responses to **Comments P208-02** through **P208-05**.

Response to Comment Letter P210 – D.B.

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P211 – Nelson E. Owens

P211-01 Comment noted.

P211-02 If the project site is placed into trust for the Tribe, the State and County would no longer have jurisdiction over the property and County property taxes would not be applicable. It is assumed that the commenter is referring to the Santa Barbara County Comprehensive Plan when mentioning the General Plan of Santa Barbara County. Elements of the Santa Barbara County Comprehensive Plan relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to the Santa Barbara County Comprehensive Plan are evaluated throughout Section 4.0 of the EA. If the Proposed Action is approved, oversight of future development would be provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion.

P211-03 Potential impacts to the Santa Ynez Valley and its residents are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.5** for a discussion as to the purpose of the fee-to-trust process and the rationale as to why the Tribe can request a property be transferred from fee title to trust status.

Response to Comment Letter P212 through P228

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P197. Refer to **Response to Comment Letter P197**.

Response to Comment Letter P229 – Ingerid J. Ekeland

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P230 through P232

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P197. Refer to **Response to Comment Letter P197**.

Response to Comment Letter P233 – William Zeutzius, Jr.

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is addressed to Santa Barbara County and not the BIA.

Response to Comment Letter P234 through P244

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P197. Refer to **Response to Comment Letter P197**.

Response to Comment Letter P245 – Dr. Gary Charness

P245-01 Comment noted. If the project site is placed into trust for the Tribe, the State and County would no longer have jurisdiction over the property and County property taxes would not be applicable. That being said, the Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. Development of 143 residential units on the 1,433-acre project site is not anticipated to affect property values in the area. Socioeconomic impacts are analyzed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Refer to **General Response 3.1.5** for a discussion as to the purpose of the fee-to-trust process and the rationale as to why the Tribe can request a property be transferred from fee title to trust status.

P245-02 through **P245-12**

The comments are nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letters P246 through P253

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P254 – Kyle Abello

P254-01 Potential impacts to water resources, including to groundwater and as related to treated wastewater, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. Potential impacts to biological resources; including to natural flora and fauna, to vernal pools, and to oak savanna and grassland habitats; are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

P254-02 Comment noted. Elements of the SYVCP relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to the SYVCP are evaluated throughout Section 4.0 of the EA.

Response to Comment Letter P255 – Don and Judy Carter

P255-01 Comment noted.

P255-02 Potential impacts to groundwater are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA, which require the new groundwater wells be located south of the Baseline fault within the relatively unexploited Careaga Formation. Refer to **General Response 3.1.9** regarding revisions to the design of the tribal facilities under Alternative B and drought mitigation incorporated into the Final EA.

P255-03 Comment noted. If the land is taken into trust, the Tribe would be responsible for regulation of the WWTP with further oversight provided by the USEPA and other federal agencies in accordance with applicable federal regulations including the Clean Water Act. As discussed in the EA, the recycled water from the WWTP would meet the requirements set forth in California Code of Regulations, Title 22 for release into the environment. Refer to **General Response 3.1.9** for additional discussion as to the protection of existing water quality and to **General Response 3.1.12** for additional discussion regarding future development and regulation.

P255-04 Potential impacts to water resources are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. The Final EA has been prepared in accordance with the CEQ Regulations for Implementing

NEPA and the BIA NEPA Guidebook and provides adequate analysis to provide for a "hard look" at the Proposed Action's and proposed alternatives' environmental impacts, including to water resources. Refer to **General Response 3.1.3** for further discussion.

Response to Comment Letter P256 – Julie Benson

P256-01 Impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Potential impacts to water resources, including to groundwater and as related to treating wastewater, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. Potential impacts to public services; including to fire and police; are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. The Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion.

P256-02 Comment noted.

P256-03 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process. If the Proposed Action is approved, future oversight would be provided by federal agencies; refer to **General Response 3.1.12** for further discussion.

Response to Comment Letter P257 – Brandon Amyx

P257-01 Comment noted. Potential impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P257-02 Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts associated with solid waste are addressed in Section 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and as discussed therein, no adverse impacts are identified. Potential impacts related to noise are addressed in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9 of the EA, and as discussed therein, no adverse impacts were identified. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would

be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

P257-03 Comment noted. Potential impacts of the Proposed Action to visual resources; including view protection, consistency with surrounding development, and consistency with existing character; are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to biological resources; including wetland protection and concerns related to native/invasive species; are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA.

P257-04 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process and regarding the Tribe's need for housing. The EA considers the Proposed Action and project alternatives in their entirety. If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion.

Response to Comment Letter P258 – Josiah Jenkins

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P259 – David and Lauren Watts

P259-01 Comment noted. If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion. Existing environmental conditions relevant to the Proposed Action and project alternatives; including sanitation, runoff, water resource, and traffic concerns; are presented in Section 3.0 of the EA.

P259-02 It is assumed that the commenter is referring to the SYVCP when mentioning the Valley Plan. If the trust acquisition is approved, all of the project parcels would be exempt from County land use regulations, including the SYVCP. Refer to the response to **Comment L3-09** regarding the Williamson Act contracts on the project site parcels.

P259-03 Potential impacts to water resources, including to groundwater, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. The Tribe has incorporated mitigation specific to drought conditions that will be implemented during official drought declarations by the County; text was added to Section 5.2 of the Final EA to describe the drought mitigation measures.

Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort. If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion.

Response to Comment Letter P260 – Michael Dunn

P260-01 Comment noted.

P260-02 Comment noted. The existing condition of the Uplands Basin is presented in Section 3.2 of the EA. Potential impacts to groundwater are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. Refer to **General Response 3.1.9** for further discussion.

P260-03 Comment noted. Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort. Potential impacts to air quality are addressed in Sections 4.1.3, 4.2.3, 4.3.3, and 4.4.3 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.3 of the EA. Potential impacts associated with safety are addressed as appropriate under each environmental resource throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Potential impacts to roadways are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to law enforcement services are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as stated therein, no adverse impacts would occur with implementation of the project alternatives

P260-04 As discussed in Sections 2.2 and 2.3 of the EA, the Tribe proposes to develop and operate a sewer system and WWTP to treat wastewater; refer to **General Response 3.1.9** for a discussion of water quality relevant to the proposed WWTP. The existing water quality in the vicinity of the project site is presented in Section 3.2 of the EA. Potential impacts to water resources, including water quality, are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4,

4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA.

P260-05 Comment noted.

Response to Comment Letter P261 – Shelia Benedict

P261-01 Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P262 – Brian Kramer

P262-01 Comment noted.

P262-02 Potential impacts to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P262-03 and **P262-04**

Potential impacts to the surrounding land uses are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts would result from implementation of the Proposed Action. Refer to **General Response 3.1.10** for further discussion. The analysis within the Final EA regarding land use was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and provides a "hard look" at the Proposed Action's and proposed alternatives' environmental impacts. Further study related to land use is therefore not required; refer to **General Response 3.1.3** for further discussion.

P262-05 Regarding the inconsistency of Alternatives A and B with the SYVCP, refer to **General Response 3.1.10**. Potential impacts to public services, including infrastructure, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts to transportation, including infrastructure, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

P262-06 Potential impacts to oak trees are discussed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4.3 of the EA. The mitigation measures presented in the EA were prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and are therefore sufficient to minimize the impact of Alternatives A and B. Refer to **General Response 3.1.16** for further discussion.

P262-07 through **P262-09**

Potential impacts to biological resources; including jurisdictional waters of the U.S., nest sites for migratory birds, and Vernal Pool Fairy Shrimp (VPFS) habitat; are discussed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. The mitigation measures presented in the EA were prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and are therefore sufficient to minimize the impact of Alternatives A and B. Refer to **General Response 3.1.7** for further discussion regarding biological impacts analyzed within the EA. Refer to **General Response 3.1.3** for an explanation as to why further study is not required.

P262-10 A comprehensive air quality analysis, including construction impacts of Alternatives A and B, is provided in Sections 4.1.3 and 4.2.3 of the EA. As shown in Section 3.4 of the EA, the project site is located in the South Central Coast Air Basin (SCCAB), which is classified as attainment or unclassifiable for all National Ambient Air Quality Standards (NAAQS). Accordingly, a federal general conformity determination analysis is not required, and construction of the Alternatives A and B would not cause an exceedance of NAAQS per 40 CFR 93 of the Clean Air Act. The NAAQS are air quality standards which provide public health protection, including protecting the health of "sensitive" populations. Because construction of the Alternatives A and B would not cause an exceedance of the NAAQS, the project construction would not have a major environmental impact on the surrounding community or downwind residences, and no mitigation measures are warranted. Regardless, the Tribe proposed BMPs in Section 5.3 of the EA that would reduce construction-related emissions. Refer to **General Response 3.1.6** regarding updates to the air quality analysis included in the Final EA.

Noise impacts are discussed in Sections 4.1.10 and 4.2.10 of the EA. As discussed therein, the construction noise at the nearest sensitive receptor would be 77.0 dBA under both Project Alternative A and B, which is less than the daytime federal construction noise threshold of 78 dBA; therefore, no mitigation measures are warranted. The commenter is correct there would be an increase in the noise level during construction of Alternatives A and B; however, the increase would be intermittent, temporary, and would not exceed the federal noise standard for construction.

Accordingly, no further study of air quality or noise issues from construction activities is warranted; refer to **General Response 3.1.3** for further discussion.

P262-11 Refer to **General Response 3.1.10** for a discussion of the project alternatives as they relate to existing land use on properties surrounding the project site and existing local land use policies. The impacts of the project alternatives to land use are discussed in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as stated therein, no adverse impacts would result due to

implementation of the Proposed Action. Potential impacts related to noise are addressed in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9 of the EA, and as discussed therein, no adverse impacts were identified. Potential impacts to land resources are addressed in Sections 4.1.1, 4.2.1, 4.3.1, and 4.4.1 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.1 of the EA. Potential impacts to water resources are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to air resources are addressed in Sections 4.1.3, 4.2.3, 4.3.3, and 4.4.3 of the EA; no adverse impacts to air resources would occur with implementation of the project alternatives, and additional protective measures are included in Section 5.3 to further reduce impacts. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

P262-12 Comment noted. The Viewshed Protection Zone is to protect the scenic designation of SR-154. As stated in Section 2.1.12 and 2.2.12, the housing developments proposed under Alternatives A and B that would be visible from Baseline Avenue and Armour Ranch Road would be similar in visual character to the surrounding rural residences. Refer to **General Response 3.1.14** for further discussion. With implementation of the measures and BMPs outlined in Section 2.0 of the EA, the impact to visual resources would be minimal and no viewshed protection zones between the project site and Baseline Avenue and/or Armour Ranch Road are necessary. The analysis within the Final EA regarding visual resources was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and provides a "hard look" at the Proposed Action's and proposed alternatives' environmental impacts. Further study related to visual resources is therefore not required; refer to **General Response 3.1.3** for further discussion.

P262-13 Comment noted. Traffic related to the construction of the project alternatives, including related safety concerns, was addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7. As discussed therein, trips associated with the delivery and removal of heavy equipment and materials to the site would occur intermittently during construction, as large vehicles would remain on-site during most phases of construction and materials would be stockpiled to reduce costs associated with transportation. Delivery trips would be slightly increased under Alternative B compared to A to provide additional materials for construction of the tribal facilities. Construction worker trips would be the same under Alternatives A and B and would not overlap with morning commute peak hours but would overlap by 30 minutes with evening commute peak hour. Due to the temporary and intermittent nature of construction traffic associated with the phased construction of the alternatives, the limited number of trips

expected, and the timing of these trips, construction trips on study intersections and roadways would result in minimal impacts to traffic.

As discussed in Section 4.1.10, the traffic noise resulting from construction material delivery and worker trips would increase the existing ambient noise level of roadways by a maximum of 3.6 dBA, Leq to 63.4 dBA, Leq at the nearest sensitive receptor (located 50 feet from haul routes) under Alternative A, which is less than the federal construction noise threshold of 78 dBA. As discussed in Section 4.2.10, under Alternative B, the existing ambient noise level of roadways would increase by a maximum of 4.9 dBA, Leq to 64.7 dBA, Leq at the nearest sensitive receptor (located 50 feet from haul routes) due to construction traffic; this is less than the federal construction noise threshold of 78 dBA.

The analysis within the EA regarding traffic and noise was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and provides a "hard look" at the Proposed Action's and proposed alternatives' environmental impacts. Further study related to traffic, including related safety, and noise is therefore not required; refer to **General Response 3.1.3** for further discussion. Note that an updated TIS is included as revised Appendix I to the Final EA as it contains updated traffic data given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, and the results are incorporated into the appropriate sections of the Final EA.

P262-14 Transportation and circulation are addressed in Section 3.7 (baseline conditions) of the EA, and impacts associated with an increase in traffic generated by Alternatives A and B are addressed in Sections 4.1.7, 4.2.7, and 4.4.7 of the EA. A TIS was conducted to assess the existing conditions of the transportation network and assess associated impacts from Alternatives A and B. The TIS is included as revised Appendix I to the Final EA as it contains updated traffic data given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, and the results are incorporated into the above-mentioned sections of the EA. Sections 4.1.7, 4.2.7, and 4.4.7 of the EA identify the intersections and roadway segments that would operate at an unacceptable LOS in the near-term and cumulative scenarios, and the mitigation measures provided in Section 5.7 of the EA would reduce these impacts to a minimal level. In the cumulative scenario, all intersections impacted by Alternatives A and B would operate at an unacceptable LOS with or without implementation of Alternatives A and B. The fair share funding amounts provided in the mitigation measures were calculated using the Caltrans formula derived from the Caltrans traffic study guidelines (Caltrans, 2002) and represent adequate mitigation to minimize impacts of Alternatives A and B in the near-term and cumulative scenarios.

P262-15 Pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, the BIA analyzed all reasonable alternatives in the EA; refer to **General Response 3.1.13** for further discussion. Refer to **General Response 3.1.12** regarding future development on the project site. Potential impacts of the Proposed Action and project alternatives to environmental resources are analyzed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P262-16 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P262-17 Comment noted.

Response to Comment Letter P263 – Charlotte and John Valestra

P263-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P264 and P265

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P163. Refer to **Response to Comment Letter P163**.

Response to Comment Letter P266 – Mark Taylor

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter P248. Refer to **Response to Comment Letter P248**.

Response to Comment Letter P267 – Josiah Jenkins

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a duplicate of Comment Letter P258. Refer to **Response to Comment Letter P258**.

Response to Comment Letter P268 – Della Casberg Deats

P268-01 Comment noted.

P268-02 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P268-03 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process and regarding the Tribe's need for

housing. For comments related to the applicability of existing land use policies and plans relevant to the Proposed Action and project alternatives, refer to **General Response 3.1.10**.

P268-05 Comment noted. Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort. Refer to **General Response 3.1.4** regarding the future use of the project site for gaming purposes.

P268-06 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to the response to **Comment L4-03** regarding the laws that govern trust acquisition. Refer to **General Response 3.1.2** for a discussion regarding the level of environmental review provided by the BIA for the Proposed Action and an explanation as to how the Final EA constitutes compliance with NEPA.

Response to Comment Letter P269 – Paul R. Deats

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P268. Refer to **Response to Comment Letter P268**.

Response to Comment Letter P270 – Patricia and J.B. Hunter

P270-01 Comment noted. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process and regarding the Tribe's need for housing.

Response to Comment Letter P271 – Linda and Sid Kastner

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P31. Refer to **Response to Comment Letter P31**.

Response to Comment Letter P272 – Denison and Tami Bollay

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P249. Refer to **Response to Comment Letter P249**.

Response to Comment Letter P273 – Gary Shepherd

P273-01 Comment noted.

P273-02 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P273-03 Refer to **General Response 3.1.10** regarding Right-of-Ways (ROWs) on the project site.

Response to Comment Letter P274 – Mark Tafelski

P274-01 Comment noted.

P274-02 If the project site were taken into trust, the Tribe would maintain rights to mineral resources and groundwater resources on the property. However, as required by NEPA, the BIA must evaluate the impact of the Proposed Action and project alternatives to existing mineral and groundwater resources. As stated in Section 3.1 of the EA, the project site contains no mineral resources of importance to the County or Mineral Resource Zones (considered valuable by the State of California); therefore no impacts would occur relevant to mineral resources. The project site does provide access to groundwater, and the Tribe proposes to utilize groundwater as the drinking water source for Alternatives A and B. As stated in Section 4.1.2 of the EA, an adverse impact to groundwater would occur if either construction or operation would result in a significant decline in groundwater levels, a significant decline in groundwater recharge rates, and/or cause an exceedance of applicable groundwater quality criteria. With the mitigation measures presented in Section 5.2 of the EA, Alternatives A and B would not have an adverse impact to groundwater levels, groundwater recharge rates, and/or groundwater quality. Refer to **General Response 3.1.9** for further discussion.

The Tribe has incorporated mitigation specific to drought conditions that will be implemented during official drought declarations by the County; text was added to Section 5.2 of the Final EA to describe the drought mitigation measures.

Response to Comment Letter P275 – Jon Quirt

P275-01 Comment noted. Potential impacts to water resources, including to groundwater and water supply, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA. Refer to **General Response 3.1.9** for further groundwater discussion.

Response to Comment Letter P276 – Michael Loman

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P277 – Carol Petersen

P277-01 Comment noted. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

Potential impacts to public services, including infrastructure, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts to transportation, including infrastructure, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

P277-02 Potential impacts to water resources are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to traffic, including infrastructure, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to public services; including infrastructure, demands on police, and demands on hospitals; are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. As discussed in Sections 2.2, 2.3, 4.1.2, 4.1.9, 4.2.2, 4.2.9, 4.4.2, and 4.4.10 of the EA, the Tribe proposes to develop its own water supply on the project site using groundwater and to treat its own wastewater on the project site using a sewer system and WWTP. The commenter is correct that if the project site is placed into trust for the Tribe, the State and County would no longer have jurisdiction over the property and County property taxes would not be applicable. The Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion.

P277-03 Comment noted. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process.

P277-04 Comment noted. Potential impacts to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

Response to Comment Letter P278 – Eric Baumgarten

P278-01 Comment noted. Potential environmental and fiscal impacts are addressed throughout Section 4.0 of the EA consistent with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. For example, loss of County tax revenue is addressed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA; as stated therein, implementation of Alternatives A and B would result in a de minims loss (0.01

percent) of the County's total property tax revenue. Refer to **General Response 3.1.12** regarding regulation of future development on the project site.

P278-02 The purpose of the EA public comment period is to solicit comments from the public on the Proposed Action and project alternatives, thereby giving the public an opportunity to voice their thoughts regarding the Proposed Action and project alternatives analyzed within the EA. The public comment period for the EA was established consistent with Section 6.2 of the BIA NEPA Guidebook. The commenter is correct that if the project site is placed into trust for the Tribe, the State and County would no longer have jurisdiction over the property and County property taxes and permit fees would not be applicable. The Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion.

P278-03 Comment noted. Potential impacts to water resources are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. With the proposed two additional groundwater wells located south of the Baseline fault within the relatively unexploited Careaga Formation, impacts to neighboring wells would be minimal. Refer to **General Response 3.1.9** for further groundwater discussion.

P278-04 Comment noted. Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort.

P278-05 Comment noted. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process. Refer to the response to **Comment P278-03** regarding jurisdiction of the County and funding of public services.

P278-06 Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P279 – Peter Van Iderstine

P279-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P279-02 Refer to **General Response 3.1.9** regarding groundwater use and drainage and groundwater quality concerns.

P279-03 Refer to **General Response 3.1.5** regarding the purpose and need of the Proposed Action and project alternatives.

P279-04 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

Response to Comment Letter P280 – Jay Richolson

P280-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P281 and P282

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

Response to Comment Letter P283 – Cappello and Noel, LLP Legal Secretary Anne Marie Balash

P283-01 Refer to **General Response 3.1.1** regarding the comment period deadline on the EA. All comment letters received on the EA were reviewed. Responses are provided to comment letters received at the BIA offices before or on the deadline. Responses to comment letters received after the deadline are only provided if the comment letter brought up an entirely new issue not addressed in a comment letter received prior to the deadline.

Response to Comment Letter P284 – Peritus Asset Management, LLC HR Manager/Office Manager Charlotte Dodge

P284-01 and **P284-02**

Comments noted.

Response to Comment Letter P285 – Louis Friedman

P285-01 This comment is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

P285-02 Refer to the response to **Comment P259-02** regarding the Williamson Act contracts on the project site.

P285-03 If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P285-04 The Proposed Action evaluated within this EA is the trust acquisition of the 1,433-acre project site; any items not within this project scope are beyond the scope of the EA. The Tribe is recognized as an American Indian Tribe by the Secretary of the Interior ["Indian

Entities Recognized and Eligible to Receive Services from the United States Bureau of Indian Affairs" Federal Register 78 (6 May 2013): 26384-26389] and has been determined by the Department of the Interior to have "been under Federal jurisdiction in 1934" according to the Solicitor's Opinion dated May 23, 2012.

P285-05 If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion. Elements of the SYVCP relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to the SYVCP are evaluated throughout Section 4.0 of the EA. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process. Refer to **General Response 3.1.2** regarding the TCA.

P285-06 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process.

P285-07 through **P285-18**

These comments are nearly identical to those of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P286 – Sandra Jankowski

P286-01 Comment noted.

P286-02 This comment is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

P286-03 through **P286-05**

Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process. The Tribe pays property taxes to the County for the land it owns in fee, which presently includes the project site. Additionally, the Tribe and County have agreements in place for the Tribe to provide financial support to the County for public services, such as law enforcement and fire protection, provided by the County on trust land; refer to **General Response 3.1.11** for further discussion.

P286-05 Refer to the response to **Comment L4-03** regarding the laws that govern trust acquisition.

Response to Comment Letter P287 – Linda Kastner

P287-01 Comment noted.

P287-02 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P287-03 Refer to the response to **Comment P207-10** regarding the analysis of transportation and circulation impacts provided in the EA. The Tribe would finance the installation and maintenance of new roadways within the project site if the Proposed Action were approved. As stated in the mitigation measures identified in Section 5.7, the Tribe would provide fair share funding contributions for State and County roadway improvements required to maintain acceptable LOSs with implementation of the selected project alternative. With implementation of the mitigation measures identified in Section 5.7, no adverse impacts to transportation and circulation would result with implementation of Alternatives A and B. Further study of transportation and circulation impacts related to the Proposed Action and project alternatives is therefore not necessary. Refer to **General Response 3.1.17** regarding impacts associated to the tribal facilities and the revisions to the planned tribal facilities assessed within the Final EA.

P287-04 Refer to **General Response 3.1.9** regarding concerns about impacts to groundwater supply. Refer to **General Response 3.1.2** regarding the TCA.

P287-05 Potential impacts to environmental resources are addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook; refer to **General Response 3.1.3** for further explanation as to why the document is not flawed. It is unclear what the commenter is referring to with the reference of "an entire EIA."

Response to Comment Letter P288 – Sandra Jankowski

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a forwarded email of Comment Letter P286. Refer to **Response to Comment Letter P286**.

Response to Comment Letter P289 – David and Andriette Culbertson

P289-01 Comment noted.

P289-02 through **P289-04**

Refer to **General Response 3.1.3** regarding the requirements for an EIS. Refer to **General Response 3.1.3** regarding the sufficiency and adequacy of the project description provided in Section 2.0 of the EA.

P289-05 Given the withdrawal of the TCA, the Proposed Action constitutes an off-reservation acquisition request, which is addressed under 25 CFR 151.11. Additional scrutiny of the

Tribe's justification of anticipated benefits from the trust acquisition is required by the Secretary of the U.S. Department of the Interior. However, the additional level of scrutiny does not apply to the environmental review process; refer to **General Response 3.1.2** for further discussion. The Final EA has been updated to reflect the withdrawal of the TCA.

P289-06 As discussed in Section 1.2 of the EA, there is a small operating horse stable on the project site. There would be no change to operations at the horse stable under either alternative and the facility therefore does not constitute a commercial development. The commenter is correct that Alternatives A and B as initially proposed included commercial components: expansion of the existing vineyard by approximately 40 acres (both alternatives) and development of an exhibition/banquet facility (Alternative B only). However, the Tribe has since revised the components proposed as Alternatives A and B to exclude these commercial developments; refer to **General Responses 3.1.9** and **3.1.17**, respectively, for further discussion.

The commenter is correct that fee-to-trust applications require rigorous standards of review. The BIA will adhere to the applicable standards of review for the fee-to-trust application supported by the EA. The applicable standards of review of the EA, however, do not differ based on the purpose and need of the fee-to-trust acquisition and associated project components. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and constitutes the BIA's "hard look" at the environmental impacts of the Proposed Action and project alternatives.

P289-07 Comment noted. As stated by the commenter and in Section 1.3 of the EA, the current Reservation has a residential area of approximately 26 acres and an economic development area of approximately 16 acres. Accordingly, the size of the usable portion of the Reservation amounts to approximately 50 acres, much of which has already been developed. Since much of the usable portion has already been developed, the assumption by the commenter that there is 50 acres available to develop residences is incorrect. Refer to **General Response 3.1.5** as to the justification for 143 home sites.

The Tribe is considering nine concept plans for development on the project site; these are included as Appendix N to the EA. The Tribe selected two concept plans to evaluate in detail in the EA as these two plans are most representative of the nine plans. The two selected plans are identified as Alternative A and Alternative B in the EA and are presented in detail in Sections 2.2 and 2.3, respectively.

P289-08 Refer to the response to **Comment P289-06** regarding the standards of review required for fee-to-trust applications and EAs.

P289-09 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process.

P289-10 Comment noted. Refer to **General Response 3.1.18** regarding the development of the site for agricultural purposes.

P289-11 Refer to **General Response 3.1.8** regarding the analysis of cultural resources in the EA.

P289-12 Refer to **General Response 3.1.2** regarding the TCA.

P289-13 Comment noted. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P290 – Kendall Mills

P290-01 Comment noted.

P290-02 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P290-03 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.9** regarding groundwater use at the project site.

Response to Comment Letter P291 – Kendall Mills

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P290 as it only adds commenter's email address. Refer to **Response to Comment Letter P290**.

Response to Comment Letter P292 – Linda Kastner

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a duplicate of Comment Letter P287. Refer to **Response to Comment Letter P287**.

Response to Comment Letter P293 – Dr. Jim and Mrs. Marilyn Elam

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P294 – Chris Mills

P294-01 and **P297-02**

Comment noted. Refer to **General Response 3.1.2** regarding the TCA. The Tribe currently owns the project site in fee and therefore retains groundwater rights on the property. The commenter does not provide specific questions regarding groundwater that have been "unanswered" and therefore a response cannot be provided. Refer to **General Response 3.1.9** for further discussion of groundwater impacts. The commenter is correct that local land use, planning, and development guidelines would no longer apply after the land is taken into trust. If the Proposed Action is approved, future development on tribal lands would be at the discretion of the Tribe with environmental oversight provided by the Tribe and federal agencies; refer to **General Response 3.1.12** for further discussion.

P294-03 As discussed in Sections 4.1.4, 4.2.4, and 4.4.4 of the EA, the impacts of Alternatives A and B to biological resources would be reduced or avoided with implementation of the mitigation measures included in Section 5.4.

Response to Comment Letter P295 – Earl Shepherd

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as it is a near duplicate of Comment Letter P273. Refer to the response to **Comment P273-03**.

Response to Comment Letter P296 – Bruce and Kathie McBroom

P296-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P296-02 It is assumed the commenter is referring to the TCA; refer to **General Response 3.1.2** regarding the TCA.

P296-03 It is assumed the commenter is referring to the TCA; refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P297 – Rebecca Flynn

P297-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P298 – Donn Crummer

P298-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P298-02 Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process.

P298-03 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P299 – Rob Walton

P299-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P299-02 The Tribe currently owns the project site in fee.

P299-03 This comment is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

P299-04 and **P299-05**

Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P300 – Kurt Alldredge

P300-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P300-02 Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort.

P300-03 Refer to **General Response 3.1.2** regarding the TCA. The Tribe's plans for the project site (referred to as "Camp 4" in the comment) are clearly laid out in Section 2.0 of the EA. The Tribe is considering nine concept plans for development on the project site; these are included as Appendix N to the EA. The Tribe selected two concept plans to evaluate in detail in the EA as these two plans are most representative of the nine plans. The two selected plans are identified as Alternative A and Alternative B in the EA and are presented in detail in Sections 2.2 and 2.3, respectively. As described therein, under both alternatives, groundwater would be developed as the water supply and the Tribe would install and operate a dedicated sewer system and WWTP on the project site. Potential impacts to land resources are addressed in Sections 4.1.1, 4.2.1, 4.3.1, and 4.4.1 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.1 of the EA. Potential impacts to biological resources, including impacts to animals and migratory birds, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. Potential impacts to traffic, including infrastructure, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be

reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to public services; including to infrastructure, fire, and police; are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Regarding the inconsistency of the project alternatives with the SYVCP, refer to **General Response 3.1.10**. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

P300-04 It is assumed the commenter is referring to the TCA; refer to **General Response 3.1.2** regarding the TCA.

P300-05 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P300-06 Refer to **General Response 3.1.5** regarding the need for the Proposed Action and project alternatives.

P300-07 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to the response to **Comment P278-02** regarding the opportunity for the public to voice their thoughts regarding the Proposed Action and project alternatives as analyzed in the EA.

Response to Comment Letter P301 – Caryn and Tom Cantella

P301-01 and **P301-02**

Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P301-03 It is assumed that the commenter is referring to the Proposed Action and project alternatives when referencing "the project." Refer to **General Response 3.1.10** regarding the inconsistency of the project alternatives with the SYVCP.

P301-04 It is assumed that the commenter is referring to the TCA when referencing "the plan." Refer to **General Response 3.1.2** regarding the TCA.

P301-05 A Revised Water and Wastewater Feasibility Analysis, included as Appendix C of the Final EA, was prepared to analyze the impacts of using groundwater as the water supply for the developments proposed under Alternatives A and B as revised in the Final EA. Refer to **General Response 3.1.9** for further discussion.

P301-06 Refer to the response to **Comment P287-03** regarding the sufficiency of the analysis of transportation and circulation impacts provided in the EA.

P301-07 Comment noted. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P302 – Kenneth P. Day

P302-01 Comment noted. It is assumed that the commenter is referring to the TCA when referencing "the plan." Refer to **General Response 3.1.2** regarding the TCA.

P302-02 There are 22 adjudicated groundwater basins in California (DWR, 2013). However, the Uplands Basin, the water source for the project alternatives, is not one of the adjudicated groundwater basins in California. A Revised Water and Wastewater Feasibility Analysis, included as Appendix C of the Final EA, was prepared to further expand upon the analysis of impacts that would occur using groundwater as the water supply for the developments proposed under Alternatives A and B. Refer to **General Response 3.1.9** for further discussion.

P302-03 Refer to **General Response 3.1.5** regarding the purpose of the fee-to-trust process. The commenter is correct that if the project site is placed into trust for the Tribe, the State and County would no longer have jurisdiction over the property. The Tribe would be responsible for overseeing the property, with additional oversight provided by federal agencies as applicable; refer to **General Response 3.1.12** for further discussion.

P302-04 Refer to **General Response 3.1.10** regarding existing ROWs on the project site. Any new roadways included in the proposed development on the project site that are not within an existing ROW would be part of the trust land and would therefore be under the control of the Tribe.

P302-05 Comment noted.

Response to Comment Letter P303 – William J. Otto

P303-01 Comment noted. Potential impacts to environmental resources, including those resources of the surrounding community, are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P303-02 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts of the Proposed Action to visual resources, including light and glare, are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Potential

impacts to biological resources, including oak trees and wetlands, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and mitigation measures are presented in Section 5.4 that would reduce identified impacts to a minimal level. Potential impacts to water, including water supply, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA.

P303-03 The WWTP is sized to support the proposed developments under Alternatives A and B; refer to Appendix C of the Final EA for the methodology used to determine water supply needs. Refer to **General Response 3.1.17** regarding the revisions to the planned tribal facilities assessed within the Final EA.

P303-04 Refer to **General Response 3.1.17** regarding the revisions to the planned tribal facilities assessed within the Final EA. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion regarding a future casino and regarding the regulation of future development on the project site. Potential impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P303-05 Refer to **General Response 3.1.9** regarding impacts to groundwater.

P303-06 Potential impacts to land use are addressed in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse land use impacts would occur. Refer to **General Response 3.1.3** regarding the adequacy of the EA. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process.

Response to Comment Letter P304 – David Crosby

P304-01 Refer to **General Response 3.1.1** regarding requests to extend the comment period on the EA.

Response to Comment Letter P305 – Jeanne Glover

P305-01 and **P305-02**

Comments noted. Refer to **General Response 3.1.2** regarding the TCA.

P305-03 Potential impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.9** regarding impacts to groundwater resources.

P305-04 Refer to **General Response 3.1.7** regarding the protection of wetland areas. Refer to **General Response 3.1.16** regarding the protection of oak trees and oak habitat. The Tribe will implement and monitor implementation of the mitigation measures identified in Section 5.4, with collaboration and/or additional oversight provided by federal agencies as applicable.

P305-05 Refer to the response to **Comment P287-03** regarding traffic impacts.

P305-06 The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and identified no significant, unmitigated impacts; refer to **General Response 3.1.3** for further discussion.

P305-07 Refer to **General Response 3.1.5** regarding the purpose of the fee-to-trust process.

P305-08 Potential impacts to water are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to biological resources, including protected wildlife, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and mitigation measures are presented in Section 5.4 that would reduce identified impacts to a minimal level.

Response to Comment Letter P306 – Caryn and Tom Cantella

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

Response to Comment Letter P307 – Santa Ynez Valley Concerned Citizens Chairman Gregory Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P327, with the exception of a missing footer. Refer to **Response to Comment Letter P327**.

Response to Comment Letter P308 – Stand Up for California Director Cheryl Schmit

P308-01 and **P308-02**

Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P308-03 Refer to **General Response 3.1.2** regarding the TCA, including the additional level of scrutiny necessary for off-Reservation fee-to-trust acquisitions and the purpose and need given the withdrawal of the TCA.

P308-04 Refer to **General Response 3.1.13** regarding the adequacy of the range of alternatives and sufficiency of analysis of selected alternatives in the EA. Potential indirect impacts of the Proposed Action and project alternatives are evaluated throughout Section 4.0 of the EA. For example, implementation of Alternative A would not directly pollute groundwater; however, as discussed in Section 4.1.2 of the EA, construction activities and runoff from new impervious surface could contaminate surface waters, which could mix with or percolate to groundwater thereby affecting groundwater quality. Potential cumulative impacts of the Proposed Action are evaluated in Section 4.4 of the EA. For example, traffic impacts in the cumulative scenario are evaluated in Section 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

The Tribe's development plans for the project site are included in Appendix N of the EA; refer to **General Response 3.1.12** for further discussion of regulation of future development on the project site.

P308-05 Given the withdrawal of the TCA (refer to **General Response 3.1.2** for further discussion), the Proposed Action constitutes an off-reservation trust acquisition. Refer to **General Response 3.1.13** for an explanation as to how the Final EA provides sufficient evidence to support the conclusion that the project site is the only property that would meet the purpose and need of the Proposed Action in the immediate area of the existing Reservation.

P308-06 The discussion of the proposed land use and development plans for the project included in Sections 2.2, 2.3, and 2.4 of the EA provides the necessary level of detail required to assess the potential environmental impacts of each proposed alternative; refer to **General Response 3.1.3** for further discussion. The EA analyzes the incompatibility of the proposed development with existing zoning and planning regulations in Sections 4.1.8, 4.2.8, and 4.4.8 of the EA; refer to **General Response 3.1.10** for further discussion regarding the adequacy of this analysis.

P308-07 Refer to the response to **Comment L3-14** for a discussion of the evaluation of impacts to on-site existing agricultural operations. Refer to the response to **Comment L3-18** for a discussion of the adequacy of the evaluation of impacts to agricultural resources contained within the EA.

P308-08 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P308-09 Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.5** regarding the purpose of the fee-to-trust process. Potential impacts to public service, including those provided by State and local governments, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts to environmental resources that are utilized by landowners neighboring the project site are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. For example, impacts to neighboring groundwater wells are considered in Sections 4.1.2, 4.2.2, and 4.2.4 of the EA, and adverse impacts would be reduced to a minimal level with implementation of the mitigation measures identified in Section 5.2 of the EA. Refer to **General Response 3.1.11** regarding removal of the project site from the County tax base and impacts to public services and utilities.

P308-10 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P308-11 and **P308-12**

Refer to **General Response 3.1.9** regarding how mitigation measures will ensure less than significant impacts to off-site wells and local groundwater resources. Refer to the response to **Comment P178-06** regarding the possibility of the local water district monitoring wells on the project site if the trust acquisition is approved. Refer to **General Response 3.1.10** regarding ROWs on the project site.

P308-13 Refer to **General Response 3.1.7** regarding the adequacy of the analysis of impacts to biological resources provided in the EA.

P308-14 Appendix B of the EA provides the output data of the air emissions model; analyses of these data related to applicable air quality standards are provided in Sections 4.1.3, 4.2.3, and 4.4.3. Regional and local air quality rules and regulations, including provisions within the state implementation plans (SIP), do not apply directly to federal actions such as the fee-to-trust acquisition. However, as discussed in Section 3.3 and 4.1.3 of the EA, impacts to local and regional air quality are assessed under the General Conformity Rule of the CAA. Under the General Conformity Rule, the lead agency with respect to a federal action is required to demonstrate that a proposed federal action conforms to the applicable SIP(s) before the action is taken. The Conformity Review requires the lead agency to compare estimated emissions attributable to the federal action to the applicable general conformity *de minimis* threshold(s) for all CAPs for which the applicable air basin or region is in nonattainment for the applicable NAAQS. If the emission estimates are below the applicable *de minimis* thresholds, then a General Conformity Determination is not required under the CAA (40 CFR Part 93). If emission estimates are greater than *de minimis* levels, the lead agency must conduct a Conformity Determination. As discussed in Section 3.3, the project site is located

in the South Central Coast Air Basin (SCCAB), which is classified as attainment or unclassifiable for all NAAQS; therefore, a federal General Conformity Determination analysis is not required for the any of the alternatives. As shown in Sections 4.1.3, 4.2.3, and 4.4.3 and in accordance with 40 CFR 93, emissions generated from Alternatives A and B would not cause exceedences of NAAQS. Therefore, implementation of Alternatives A and B would not result in an adverse effect associated with the local or regional air quality environment.

Refer to **General Response 3.1.6** regarding updates to the air quality analysis included in the Final EA.

P308-15 Cumulative impacts are addressed in Section 4.4 of the EA; cumulative impacts to groundwater resources and traffic are addressed in Section 4.4.2 and 4.4.7 of the EA, respectively. The cumulative environment is defined in Section 4.4, and a list of approved and pending projects in the Santa Ynez Valley, which includes off-Reservation projects, is provided in Table 4-17. As shown in the footer of Table 4-17, these projects were tabulated from the Santa Barbara County – Cumulative Project Map located online (refer to Section 7.0 of the EA for the online reference); projects in the proposal phase are not included in the analysis of cumulative development. For groundwater resources, the increase in potable water demands from the implementation of Alternatives A or B will not result in potable water impacts on or from any of the other proposed projects. Potential off-site projects would be required to comply with County provisions concerning potable water supplies and water conservation. Therefore, with the siting of the new water wells for Alternatives A and B outside of influence zones of off-site wells, impacts to water supplies would not be cumulatively considerable. In addition, the Tribe has agreed to implement additional mitigation in the Final EA to reduce impacts during times of drought declaration by the County. Refer to **General Response 3.1.9** regarding how mitigation measures will ensure minimal impacts to off-site wells and local groundwater resources. As discussed in Section 4.4.7, the A.M. and P.M. peak-hour level of service at each study intersection, state highway segment, and County roadway for the long-term cumulative setting was established using 20-year projections for the Santa Ynez Valley provided by the County. The results are provided in Tables 4-23, 4-24, and 4-25 of the EA. Trips generated by Alternatives A and B were then added to the 20-year projected operations of the roadway network to assess cumulative impacts. Mitigation measures are provided in Section 5.7 to reduce identified cumulative impacts to the study roadway network. Note the cumulative environment was updated in Section 4.4 of the Final EA to reflect the Tribe's e planned hotel expansion project on the Reservation; analysis was updated accordingly in the Final EA.

P308-16 Refer to **General Response 3.1.9** regarding impacts to water quality.

P308-17 The TIS included as Appendix I of the EA was conducted following County and Caltrans methodologies, which focus on weekday commuter peak periods (both A.M. and P.M.). The tourist season in the region is typically year round, and while it may peak in the summer, schools, which generate a considerable number of trips during the weekday peak hours, are not in session during the summer. Therefore, collecting existing trip counts during the summer tourism peak would not present an appropriate baseline to assess impacts in the EA. In addition, a similar issue was raised during the environmental review of the SYVCP. In response, additional analysis was conducted comparing weekend peak-hour traffic (associated with tourism) to weekday peak hour traffic (associated with the standard commute). The results indicated that weekend peak hour traffic volumes are actually lower than the weekday commute peak hour. Accordingly, the analysis within the EA accurately assesses the potential impacts from the Proposed Action and utilizes the appropriate baseline conditions.

P308-18 Comment noted. Refer to **General Response 3.1.11** regarding removal of the project site from the County tax base and impacts to public services and utilities.

P308-19 and **P308-20**

Refer to **General Response 3.1.3** regarding the requirements for an EIS. Refer to the **Response to Comment P308-05** regarding the TCA and designation of the trust acquisition request as "off-reservation."

Response to Comment Letter P309 – Russell Radom

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P207. Refer to **Response to Comment Letter P207**.

Response to Comment Letter P310 – L.C. Smith

P310-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P310-02 Comment noted. Refer to **General Response 3.1.11** regarding removal of the project site from the County tax base and impacts to public services and utilities.

P310-03 Refer to **General Response 3.1.9** regarding mitigation measures for impacts to off-site groundwater wells and local groundwater resources as well as regarding impacts to water quality.

P310-04 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P310-05 Refer to **General Response 3.1.2** regarding the TCA. Traffic and impacts are addressed in Sections 3.7, 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA. With the incorporation of mitigation measures presented in Section 5.7 of the EA, impacts would be reduced to minimal levels.

P310-06 Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P311 – Barry Cappello (Attorney for Nancy Crawford-Hall)

P311-01 through **P311-03**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P311-04 Refer to **General Response 3.1.2** regarding the TCA.

P311-05 Refer to **General Response 3.1.13** regarding the adequacy of the alternatives discussion. The purpose and need of the Proposed Action and project alternatives is presented in Section 1.3 of the EA. The environmental impacts of the Proposed Action and project alternatives are addressed throughout Section 4.0 of the EA and include reasonably foreseeable impacts including future cumulative impacts, which are specifically addressed in Section 4.4 of the EA.

P311-06 Refer to **General Response 3.1.2** regarding the TCA and associated level of scrutiny involved with off-reservation fee-to-trust acquisition requests.

P311-07 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P311-08 The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. The Tribe's ties to the land are not discussed in the EA. Cultural resources are addressed in Section 3.5 and 4.1.5, 4.2.5, 4.3.5, and 4.4.5 of the EA; refer to **General Response 3.1.8** regarding the adequacy of the analysis of impacts to cultural resources in the EA.

P311-09 Analysis associated with impacts to groundwater resources is presented in Section 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA. As discussed there within, specific water demand requirements are presented and are far below the estimated pumping levels described in the referenced Exhibit A provided by the commenter. For example, the analysis specifically indicates that the implementation of Alternatives A and B would result in groundwater demands of 335 acre-feet per year (AFY) and 110 AFY, respectively. The comments referenced by the commenter in Exhibit A assume the actual development by the Tribe would pump up to 5,000 AFY or assumes that all 1,400 acres would be developed with grapevines requiring 2,800 AFY of irrigation water. The water demands presented within the EA are

supported by the engineering study included as Appendix C and impacts are assessed accordingly throughout Section 4.0. Refer to **General Response 3.1.9** for additional discussion regarding mitigation measures for impacts to off-site groundwater wells and local groundwater resources and for an updated discussion regarding groundwater use incorporated into the Final EA.

P311-10 Comment noted. Centralized WWTPs are not solely developed for commercial entities. Development of a centralized WWTP provides an opportunity to supply recycled water to reduce the potable water irrigation demands of the vineyard operation. The alternatives are presented in Section 2.0 of the EA. Alternative B includes tribal facilities that would benefit from a centralized WWTP.

P311-11 Refer to **General Response 3.1.12** regarding the development of the proposed alternatives as presented in the EA.

P311-12 Refer to **General Response 3.1.3** regarding the requirements for an EIS. Refer to **General Response 3.1.9** for discussions regarding mitigation measures for impacts to off-site groundwater wells and local groundwater resources.

P311-13 Refer to Section 1.3 of the EA that clearly outlines the purpose and need of the Proposed Action. Refer to **General Response 3.1.5** regarding the preference for the trust acquisition process versus the County land use approval process.

P311-14 Comment noted. Refer to **General Response 3.1.10** regarding incompatibility with existing land uses. Impacts to adjacent properties are addressed through Section 4.0 of the EA. For example, stormwater drainage for Alternative A is assessed in Section 4.1.2 of the EA. As discussed there within, a grading and drainage feasibility analysis was conducted to assess the impacts of increasing impervious surface area on the project site. The results indicate that with the inclusion of the recommended stormwater drainage improvements, stormwater flows on the project site post-development would equal existing runoff rates. In addition, development would include the incorporation of culverts to prevent impediment of existing drainages preventing the alteration of the existing drainage system on the project site. By ensuring post-development runoff rates equal pre-development rates and existing drainages are not impeded, project development would not adversely impact offsite drainage systems. Impacts to offsite traffic operations are addressed in the TIS included as Appendix I and Sections 4.1.7, 4.2.7, and 4.4.7 of the EA. Potential impacts from the utilization of recycled water are addressed in Sections 4.1.2, 4.2.2, and 4.4.2 of the EA. As discussed therein, BMPs listed in Section 2.2.10 of the EA and mitigation measures listed in Section 5.2 of the EA would ensure irrigation rates are monitored and are appropriate for the time of year to minimize incidental runoff. During the non-irrigation season, recycled water would be stored in the existing water reservoir that is located near the WWTP building on Parcel 1. Adverse

impacts to surface water and groundwater quality associated with wastewater treatment and disposal would be minimal and would be in full compliance with USEPA standards. Off-site noise impacts are addressed in Sections 4.1.10, 4.2.10, and 4.4.10 of the EA, and no adverse impacts to offsite resource were identified.

P311-15 Cumulative impacts of the proposed alternatives in combination with future off-Reservation projects are addressed in Section 4.4 of the EA. Refer to the responses to **Comments L3-09**, **L3-41**, and **P308-15** for further discussion of the cumulative impact analysis in the EA.

P311-16 Refer to **General Response 3.1.2** regarding the TCA.

P311-17 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P311-18 Refer to the **Response to Comment P311-09** regarding Exhibit A provided by the commenter.

Response to Comment Letter P312 – Gerald Rounds

P312-01 Refer to **General Response 3.1.7** regarding the adequacy of the biological resources analysis provided in Section 3.4, 4.1.4, 4.2.4, 4.3.4, and 4.1.4 of the EA. In addition, Mitigation Measure 5.4.4 of the EA would reduce potential impacts to federally-protected bird species.

Response to Comment Letter P313 – Mimi Walston

P313-01 Refer to **General Response 3.1.4** regarding the existing operations at the Chumash Casino Resort.

P313-02 Refer **to General Response 3.1.12** regarding the potential for future gaming on the project site.

P313-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P314 – Mary Lloyd Mills

P314-01 Refer to **General Response 3.1.2** regarding the TCA.

P314-02 The purpose and need of the Proposed Action is presented in Section 1.3 of the EA. As stated therein, the primary purpose and need is to address the limited availability of land to develop additional housing units on the Reservation. Secondarily, placing the vineyards into trust would allow full tribal governance over its existing agricultural operations on the property, thereby allowing the Tribe to continue to build economic self sufficiency through

diversified tribally-governed commercial enterprises. Refer to **General Response 3.1.2** regarding the TCA.

P314-03 through **P314-06**

Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.5** regarding the preference to the trust acquisition process versus the County land use development process. Refer to the response to **Comment P259-02** regarding the Williamson Act contracts on the project site.

Response to Comment Letter P315 – Jane and Marvin Johnson

P315-01 through **P315-03**

Comments noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA.

P315-04 Refer to **General Response 3.1.9** for a discussion regarding mitigation measures for impacts to off-site groundwater wells and local groundwater resources. Refer to the response to **Comment P311-14** regarding mitigation to minimize impacts related with the use of recycled water for irrigation on the project site.

P315-05 Refer to **General Response 3.1.12** regarding development on the project site and associated oversight and potential for future gaming on the project site.

315-06 Impacts associated with the tribal facilities proposed under Alternative B are addressed throughout Section 4.2 of the EA. For example, vehicle trips generated by the tribal facilities and potential impacts to the study roadway network are assessed in Section 4.2.7 of the EA. Refer to **General Response 3.1.17** regarding the revision to the tribal facilities presented in the Final EA.

315-07 Comment noted. Land use and associated conflicts associated with Alternatives A and B are addressed in Section 4.1.8, 4.2.8, and 4.4.8 of the EA.

315-08 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P316 – Joan Brandoff

P316-01 The EA was prepared in accordance with CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. As defined in Section 2.0 of the EA, the Proposed Action by the BIA is to accept the land into trust, with the foreseeable consequence of that action being the Tribe's proposed residential development. Both actions are interlinked and therefore are incorporated into the analysis in Section 4.0 as the Alternative A and B analyses.

Alternatives A and B that are linked to the Proposed Action are the nexus that determines the level of environmental review. The preparation of an EA for trust acquisition request and subsequent tribal housing project is typically reviewed under NEPA by the BIA with an EA if all impacts can be mitigated. The environmental issues and impacts of the BIA taking the land into trust under Alternatives A and B are analyzed throughout Section 4.0 of the EA. For example, under the socioeconomic conditions analysis in Section 4.1.6 of the EA, the impact of removal of the project site from the County tax base is assessed. The existing County zoning and land use prohibitions preclude development under fee title on the project site. Refer to **General Response 3.1.18** regarding the revision to the No Action Alternative in the Final EA. Refer to **General Response 3.1.5** as to why development under the County land use approval process would not achieve the objectives of the Proposed Action.

P316-02 Comment noted. The socioeconomic conditions analysis in Sections 4.1.6 and 4.2.6 of the EA for Alternatives A and B, respectively, are consistent with the BIA NEPA Guidebook for the determination of environmental impacts associated with the Proposed Action and project alternatives. The economic status of the Tribe does not offer information that provides the BIA with a "hard look" at the environmental impacts of the Proposed Action. No further discussion is warranted in the Final EA.

P316-03 The Tribe is the owner in fee of the project site and, as discussed under the No Action Alternative in Section 2.4 of the Final EA (refer to **General Response 3.1.18** regarding revisions to the No Action Alternative in the Final EA), the Tribe would develop additional vineyards on the project site if the Proposed Action is not approved. Therefore, continuing the Williamson Act contracts in place on the project site would be reasonable. Refer to **General Response 3.1.11** regarding the loss of County tax revenue as it relates to County services that would be provided on the project site if the Proposed Action were approved.

P316-04 Refer to the response to **Comment P308-15** regarding the data used to define the cumulative environment in the EA. The Inn at Mattei's Tavern (County Case Number 09DVP-00000-00019) located along SR-154 in Los Olivos was included in the cumulative conditions. Cumulative impacts related to traffic are evaluated in Section 4.4.7 of the EA, and adverse impacts would be reduced with implementation of the mitigation measures included in Section 5.7 of the EA. Cumulative impacts related to water resources, including water use, are evaluated in Section 4.4.2 of the EA, and adverse impacts would be reduced with implementation of the mitigation measures included in Section 5.2 of the EA.

At the time the EA was prepared, the Santa Ynez Valley Senior Housing Project (County Case Number 10PRE-00000-00003) (also known as the Golden Inn and Village Project), located near the intersection of North Refugio Road and SR-246 west of the Chumash Casino Resort, was in the proposal phase and hence was not included in the analysis of cumulative development. The project requires a General Plan Amendment and Rezone to change the

property's land use and zoning designations, respectively. A Draft Initial Study/Mitigated Negative Declaration for the project, including the request for a General Plan Amendment and Rezone, was available for public review and comment until April 25, 2014 (County Number 14NGD-00000-00007). A decision by the County regarding the project is anticipated to occur during the summer of 2014. To date, the project remains in the proposal phase and therefore is not included in the updated analysis of cumulative development presented in Section 4.4 of the Final EA (Santa Barbara County, 2014).

P316-05 Refer to the response to **Comment P316-01** for a discussion of the Proposed Action and project alternatives analyzed within the EA.

Response to Comment Letter P317 – Joan Brandoff

P317-01 Comment noted. Figure 2-1 of the EA shows the approximate locations of known cultural resources. Cultural resources were removed from Figure 2-1 of the Final EA, and the Cultural Resources Study remains confidential (included as confidential Appendix F of the EA). Refer to **General Response 3.1.8** regarding consultation with State agencies about identified on-site cultural resources and compliance with NEPA regulations.

Response to Comment Letter P318 – Rachel Mojonnier

P318-01 Comment noted. Potential impacts to environmental resources are evaluated throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.0 of the EA. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P318-02 The Tribe's development plans for the project site are included in Appendix N of the EA. Refer to **General Response 3.1.13** for a discussion as to why only two of the nine concept plans in Appendix N are fully evaluated in the EA.

P318-03 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P318-04 The Tribe's development plans for the project site are included in Appendix N of the EA. The design of the tribal facilities has been updated; refer to **General Response 3.1.17** for details. Potential impacts associated with development of the tribal facilities under Alternative B are evaluated throughout Section 4.2 of the Final EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.0 of the EA.

P318-05 Refer to **General Response 3.1.9** regarding impacts to groundwater associated with the proposed water supply.

P318-06 Traffic that would be generated by the proposed alternatives is analyzed in the TIS, included as Appendix I of the Final EA. The results of the TIS are summarized in Sections 3.7, 4.1.7, 4.2.7, and 4.4.7 of the EA. The existing access roads leading to the project site would be improved in accordance with County standards to allow ingress and egress to the project site for the anticipated volume of traffic that would be generated by operation of the selected project alternative. For example, improvements would include development of a connection from the project site to Armour Ranch Road within an existing ROW. The impacts of additional traffic are adequately addressed within the EA, as discussed further in **General Response 3.1.6**. With implementation of the mitigation measures identified in Section 5.7 of the EA, the adverse impacts of traffic would be reduced to a minimum level in the near-term and cumulative scenarios.

P318-07 Refer to **General Response 3.1.7** regarding the adequacy of the biological impact analysis in the EA, including State-listed special-status species.

P318-08 Refer to **General Response 3.1.8** regarding the analysis of cultural resources and the confidential archaeological investigation. Letters were sent to the list of individuals and groups received from the NAHC; to date, no responses have been received. Section 3.5.3 of the Final EA has been updated to reflect this.

P318-09 Refer to **General Response 3.1.10** regarding the inconsistencies with the existing land use plans in the EA.

P318-10 Potential impacts to environmental resources are evaluated throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.0 of the EA. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P318-11 The commenter is correct that the Tribe is not the agency that would have jurisdiction over traffic improvements. If the Proposed Action is approved, a Monitoring and Reporting Program Plan (MRPP) will be prepared with either a mitigated FONSI or a Record of Decision (ROD) that will specify the timing and responsible party for ensuring mitigation is implemented. The traffic mitigation presented in Section 5.7 was prepared in accordance with Section 1508.20(c) of the CEQ Regulations for Implementing NEPA.

Response to Comment Letter P319 – Kelly McConnell

P319-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P319-02 Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort. The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. With mitigation measures included in Section 5.0 of the EA, adverse impacts would be reduced or avoided. Refer to the response to **Comment P278-02** regarding the opportunity to comment on the Proposed Action and project alternatives as analyzed in the EA.

P319-03 through **P319-08**

These comments are nearly identical to those under **Comment Letter P318**. Refer to the responses to **Comments P318-01** through **P318-08**.

P319-09 Refer to the response to **Comment L3-12** regarding project induced population growth and evidence to support the conclusion that Alternatives A and B would have a negligible impact to local school districts. Further analysis related to the quantification of impacts to schools is not warranted.

P319-10 The analysis of impacts related to noise was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. The analysis presented in Section 4.1.10 of the EA presents a worst case scenario as it evaluates the noise that would be heard at the nearest sensitive receptor, a residence located 200 feet from the eastern property boundary. Table 4-8 in Section 4.1.10 of the EA displays the noise level at 50 feet for each construction phase of the project. Each construction phase considers all equipment typically used for that phase; therefore, Table 4-8 presents noise data associated with the use of multiple pieces of equipment at one time. Two construction phases would not be ongoing at one location as, for example, the foundation phase of construction cannot occur until after the excavation phase is complete. Given the selected alternative is anticipated to be construct in phases over a four to nine year timeframe, it is possible that different phases of construction may occur at various locations on the project site at the same time. However, different phases of construction would not occur at the exact same time in close enough proximity to each other and a sensitive receptor to result in a cumulative noise impact given the layout of the concept plans, the vastness of the project site, and the rural character of the surrounding area. Once tribal residences are occupied on the project site, it will be in the Tribe's best interest to minimize noise impacts of ongoing construction given that the tribal residences will be sensitive receptors.

Refer to the response to **Comment P262-13** regarding noise impacts associated with material haul routes traffic.

P319-11 As stated in Section 4.1.12 of the EA, project design would incorporate understated signage and safety lighting within public areas. Text has been added to Section 2.2.10 of the Final

EA to clarify the lighting included in the project design. Refer to **General Response 3.1.14** for further discussion regarding impacts related to lighting.

P319-12 through **P319-14**

These comments are nearly identical to those under **Comment Letter P318**. Refer to the responses to **Comments P318-09** through **P318-11**.

P319-15 The statement "All identified wetland areas and California Live Oak would be avoided to the maximum extent feasible" referred to by the commenter from page 2-10 of the EA is discussing the project design of Alternative A, not mitigation to reduce adverse impacts. The final layout of development components of Alternative A would be designed such as to avoid identified wetland areas and California live oak as much as possible given the purpose and need of the project. Consistent with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook, the protective measures outlined in Section 2.2.10 of the EA are design elements whereas the mitigation measures included in Section 5.0 of the EA includes specific means, measures, or practices that would reduce or eliminate effects of the proposed action or alternatives.

P319-16 It is unclear why the commenter believes the mitigation only recommends (not requires) work to stop if cultural resources are discovered and why the commenter believes that the mitigation does not require that qualified professionals monitor construction. Regarding known cultural resources, the mitigation in Section 5.5 of the EA states that "a qualified archaeologist shall identify appropriate buffer zones around each cultural resource…[and a] qualified Tribal Cultural Resource Monitor shall monitor construction activities occurring within 500 feet of the buffer zone." Regarding unknown cultural resources, the mitigation in Section 5.5 of the EA states that "In the event that any prehistoric or historic cultural resources, or paleontological resources, are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and the Tribe and the Bureau of Indian Affairs (BIA) archaeologist shall be consulted to assess the significance of the find… If human remains are encountered, work shall halt in the vicinity of the find and the Santa Barbara County Coroner shall be notified immediately."

P319-17 Refer to the response to **Comment P318-11** regarding ensuring traffic mitigation is implemented. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P319-18 New groundwater wells and a new WWTP are not mitigation measures. These components are part of the project design of Alternatives A and B, as discussed in Sections 2.2 and 2.3 of the EA. The environmental impacts, including indirect and cumulative impacts, associated with water supply and wastewater are evaluated in Sections 4.1.2, 4.2.2, and 4.4.2 of the EA. The mitigation measures in Section 5.4.2 of the EA require creation of waters of the U.S. at a 1:1 ratio for any affected waters of the U.S.; if wetlands are affected, creation of a wetland

mitigation site is an option. Creation of a wetland would be subject to applicable local, State, and/or federal laws, including environmental review as necessary, which would therefore ensure any potential impacts are reduced to a minimal level. The implementation of traffic improvements as required by mitigation measures in Section 5.7 of the EA would also be subject to applicable local, State, and/or federal laws, including environmental review as necessary, which would therefore ensure any potential impacts are reduced to a minimal level.

P319-19 As stated in the BIA NEPA Guidebook (BIA, 2012), "Measures or practices will only be termed mitigation measures if they have not been incorporated into the proposed action or alternatives. If mitigation measures are incorporated into the proposed action or alternatives, they are design elements, not mitigation measures." Therefore, the protective measures and BMPs listed in Section 2.0 of the EA are not included as mitigation measures in Section 5.0 of the EA. If the Proposed Action is approved, the BIA will adopt a monitoring and enforcement program and summarize the program in either a FONSI or ROD.

P319-20 Comment noted. Permits and/or approvals from regulatory agencies would not be required until after the Proposed Action is approved. If the Proposed Action is approved, the Tribe would work with the appropriate agencies to obtain all necessary permits and approvals. The mitigation measures included in Section 5.0 of the EA incorporate protective measures that would be implemented by the Tribe to meet permit requirements. For example, the mitigation measure in Section 5.4.2 of the EA specifies that if a Section 404 Clean Water Act permits is required, the Tribe shall, at a minimum, require creation of waters of the U.S. at a 1:1 ratio for affected waters of the U.S.

P319-21 Refer to **General Response 3.1.3** regarding the requirements for an EIS. The Proposed Action (placing land in to trust for the Tribe) is under the jurisdiction of and requires the approval of the BIA; refer to the response to **Comment L4-03** for further discussion. CEQA does not apply to the Proposed Action or project alternatives. Discretionary approval by State and local agencies of developments associated with or included as mitigation measures of the Proposed Action would be subject to the applicable environmental laws, which would therefore ensure any potential impacts are reduced to a minimal level. For example, approval of intersection improvements along the SR-154 corridor would be at the discretion of Caltrans, and Caltrans would be required to assess the environmental impacts associated with developing roundabouts and/or signalization.

Response to Comment Letter P320 – Fred Garcia

P320-01 Comment noted.

P320-02 It is unclear what casino the commenter is referring to as the project alternatives contain no plans for a new casino; refer to **General Response 3.1.12**. If the commenter is referring to the environmental impacts of the existing Chumash Casino Resort, refer to **General Response 3.1.4**. Potential impacts to public services, including schools, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as discussed therein, no adverse impacts to public schools would occur. Potential impacts to traffic, including related safety concerns, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

P320-03 The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P320-04 Potential impacts to water resources, including water supply, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA.

P320-05 Comment noted. Refer to **General Response 3.1.16** regarding impacts to oak trees. Potential impacts to biological resources, including special-status species, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. Refer to **General Response 3.1.7** for further discussion regarding the adequacy of the analysis of impacts to biological resources presented in the EA.

P320-06 Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort.

P320-07 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P320-08 Comment noted. The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Potential impacts to public services, including law enforcement and crime, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as discussed therein, no adverse impacts related to law enforcement or crime rates would occur with implementation of the Proposed Action. Development of 143 residential units on the 1,433-acre project site is not anticipated to affect property values in the area. Socioeconomic impacts are analyzed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA in accordance with the CEQ Regulations for Implementing

NEPA and the BIA NEPA Guidebook. Refer to **General Response 3.1.11** regarding lost tax revenue and support of public services.

Response to Comment Letter P321 – Stefani Batastini

P321-01 Refer to **General Response 3.1.12** regarding regulation of future development on the project site, including environmental agency oversight, and future plans for a casino on the project site.

Response to Comment Letter P322 – Kathyrn Elliott

P322-01 Refer to **General Response 3.1.15** for non-substantive comments or opinions. The EA and Final EA were prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook and address the potential impacts of the Proposed Action and development on all required resources; refer to **General Response 3.1.3** for further discussion as to the adequacy of the EA. The EA was released for a 90-day comment period, which exceeds the minimum 30-day comment period required by the BIA NEPA Guidebook. The EA and Final EA were not rushed. Potential impacts to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

P322-02 Potential impacts to water resources are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Refer to **General Response 3.1.9** for further discussion regarding analysis of impacts to water resources within the EA.

P322-03 Comment noted. Potential impacts to traffic, including access to existing facilities such as schools and stores, are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts related to noise are addressed in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9 of the EA, and as discussed therein, no adverse impacts were identified.

Response to Comment Letter P323 – Jennifer Solem

P323-01 through **P323-14**

These comments are nearly identical to those in **Comment Letters P318** and **P319**. Refer to the responses to **Comments P318-01** through **P318-11**, **Comments P319-09** through **P319-11**, and **Comments P319-15** through **P319-21**.

Response to Comment Letter P324 – Stand Up for California Director Cheryl Schmit

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P308. Refer to **Response to Comment Letter P308**.

Response to Comment Letter P325 – Brendan Crowley

P325-01 Comment noted. Refer to **General Response 3.1.9** regarding the adequacy of the analysis of impacts to water resources; including water supply, groundwater and the Uplands Basin, and neighboring wells; within the EA.

P325-02 and **P325-03**

The Tribe is considering nine concept plans for development on the project site; these are included as Appendix N to the EA. All nine concept plans are primarily residential developments and include minimal commercial components that would not constitute a large commercial development project. The Tribe will regulate future development on the project site with oversight provided by the Tribe and applicable federal agencies; refer to **General Response 3.1.12** for further discussion. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P326 – Suzan Hamilton with Todd Studio

P326-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P327 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

P327-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Potential impacts to the resources listed by the commenter are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. For example, potential impacts related to socioeconomic conditions, including property taxes, are addressed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA, and as discussed therein, no adverse impacts were identified.

P327-02 Comment noted.

P327-03 Bullet point (a) in the comment is unclear. From Section 1508.9(a) of the CEQ Regulations for Implementing NEPA, an EA serves to:

1) Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact.
2) Aid an agency's compliance with the Act when no environmental impact statement is necessary.
3) Aid an agency's compliance with the Act when no environmental impact statement is necessary.

P327-04 Refer to **General Response 3.1.4** regarding the impacts of the existing Chumash Casino Resort. Impacts associated with the Tribe's existing real estate holdings constitute the baseline condition of the existing environment and, although they are not explicitly referenced, are addressed where relevant in the baseline discussion within Section 3.0 of the EA. For example, traffic counts were collected along the existing roadway network during peak hours to determine baseline traffic conditions, and any trips generated by the existing gas station owned by the Tribe were captured within the collected traffic counts. Aside from contributing to the baseline condition of the existing environment, environmental impacts associated with the Tribe's existing real estate holdings are not relevant to this EA.

Refer to **General Response 3.1.2** regarding the TCA.

Regarding the commenter's assertion that the EA is insufficient, inaccurate, and inadequate and that an EIS is warranted, refer to **General Response 3.1.3**.

Regarding the bullet points one (1) through seven (7) listed by the commenter and citing M. Andriette Culbertson's September 27, 2013 Comment Letter (Comment Letter P289), refer to responses to **Comments P289-05** through **P289-12**.

Regarding bullet point eight (8) listed by the commenter that discusses the independence of the environmental consultant and the oversight by the Lead Agency, the commenter does not provide specific questions or statements. Therefore, a response cannot be provided.

P327-05 through **P327-24**

These comments are nearly identical to those of Comment Letter P308. Refer to the responses to **Comments P308-03** through **P308-20**.

Response to Comment Letter P328 – Susan Petrovich, Attorney for Charles Grimm

P328-01 Comment noted.

P328-02 Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P328-03 Refer to the response to **Comment L4-03** regarding the authority of the Secretary of the Interior to place the project site into trust for the Tribe and the U.S. Department of the Interior's recognition of the Tribe. It is assumed that the commenter is referring to proposed events to be hosted by the Tribe at the proposed tribal facilities when referencing "events"; refer to **General Response 3.1.17** regarding the revisions to the proposed tribal facilities. The Tribe's development plans for the project site are included in Appendix N of the EA; refer to **General Response 3.1.12** for further discussion of regulation of future development on the project site. The potential impacts of the Proposed Action to environmental resources are analyzed throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P328-04 For comments related to the TCA and standards of review for the EA, refer to **General Response 3.1.2**. Refer to response to **Comment L4-14** regarding the analysis of cumulative impacts in the EA.

P328-05 Refer to the response to **Comment L4-03** regarding the authority of the Secretary of the Interior to place the project site into trust for the Tribe and the U.S. Department of the Interior's recognition of the Tribe.

P328-06 Refer to **General Response 3.1.2** for comments related to the TCA, including associated standards of review of the EA.

P328-07 Comment noted. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P328-08 As stated in Section 6.3 of the EA, the County Planning Department and County Public Works Department were consulted during the preparation of the EA. Additionally, the BIA extended the EA public comment period to allow public, including State and local agencies, sufficient time to submit comments on the document; refer to **General Response 3.1.1** for further discussion. Comments from State and local agencies were considered in development of the Final EA.

The EA evaluates inconsistencies between the Proposed Action and State and local laws and plans as required by the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. For example, it is noted in Sections 4.1.8 and 4.2.8 that the development of tribal housing on the 1,433-acre property would not be consistent with the allowed land uses under the AG-II-100 zoning and AC land use designation identified by the Santa Barbara County Comprehensive Plan. The discussions provided in the above-referenced sections in the EA go on to conclude that, despite the inconsistencies, implementation of Alternatives A and B would not conflict with surrounding land uses and therefore would result in minimal adverse impacts to land uses; refer to **General Response 3.1.10** for further discussion.

P328-09 Refer to response to **Comment L4-07** regarding the reasonable range of alternatives evaluated within the EA and the regulation of future development on the project site.

P328-10 Refer to response to **Comment L4-08** regarding the EA's analysis of water resources and associated impacts.

P328-11 Refer to response to **Comment L4-09** regarding the water demands of the project alternatives.

P328-12 Refer to response to **Comment L4-10** regarding the water quality of groundwater on the project site.

P328-13 Refer to response to **Comment L4-11** regarding total water demand of the project alternatives.

P328-14 Refer to the responses to **Comments L4-08** and **L4-12** regarding the groundwater water levels in the project area. Refer to response to **Comment L4-13** regarding sewer service under Alternatives A and B.

P328-15 Refer to response to **Comment L4-14** regarding the analysis of cumulative impacts in the EA.

P328-16 The commenter does not provide specific examples to support their comment that the EA is flawed and inadequate and therefore a specific response cannot be provided. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Cultural resources are addressed in Section 3.5 and 4.1.5, 4.2.5, 4.3.5, and 4.4.5 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.5 of the EA. Potential impacts to water; including wastewater, water treatment, water demand, water supply and quality, and surface water drainage and flooding; are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to public service, including schools, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.9 of the EA. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Potential impacts to biological resources, including threatened and endangered species, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and implementation of the mitigation

measures presented in Section 5.4 would reduce identified impacts to a minimal level. Potential impacts to air resources are addressed in Sections 4.1.3, 4.2.3, 4.3.3, and 4.4.3 of the EA; no adverse impacts to air resources would occur with implementation of the project alternatives, and additional protective measures are included in Section 5.3 to further reduce impacts.

The BIA has the jurisdiction to take the project site into trust for the Tribe; refer to the response to **Comment L4-03** for further discussion. For comments related to the TCA and standards of review for the EA, refer to **General Response 3.1.2**. Refer to response to **Comment L4-14** regarding the analysis of cumulative impacts in the EA. Refer to **General Response 3.1.3** for an explanation as to how the EA meets the adequacy standards imposed by NEPA.

P328-17 Parcel 3 contains Assessor Parcel Numbers (APNs) 141-230-023 and 141-140-010. Figure 1-3 in the Final EA has been updated to clarify this.

P328-18 There is no mention of 25 CFR Part 151 in Section 1.1 of the EA. As described in Section 1.3 of the Final EA, the Tribe cannot exercise its right to sovereignty nor develop the necessary number of homes on the project site to fulfill the purpose and need of the project without approval of the Proposed Action. Given the withdrawal of the TCA (refer to **General Response 3.1.2** for further discussion) approval of the requested fee-to-trust acquisition pursuant to 25 CFR Part 151.3(a)(3) is needed to allow the Tribe to proceed.

P328-19 Refer to the response to **Comment P328-17** regarding the APN information for Parcel 3.

P328-20 Figures 1-1 through 1-3 of the Final EA show the location of the project site and surrounding properties. Consultation during preparation of the EA was conducted in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook; local agencies consulted with during preparation of the EA are listed in Section 6.0 of the EA. As stated in the BIA NEPA Guidebook, preparation of an EA includes limited public notification and review. The Lead Agency, the BIA, will consider approval of the Proposed Action utilizing the information and analysis presented in the EA, the response to comments, and the Final EA, along with the entire administrative record.

P328-21 Comment noted. The exact location of site features within each parcel is not necessary for the baseline or analysis of the Proposed Action and project alternatives.

P328-22 Refer to **General Response 3.1.5** regarding the purpose and need of the Proposed Action and project alternatives. The concept plans (included in Appendix N of the EA) were developed to meet the purpose and need while preserving the rural character of the Santa Ynez Valley; refer to **General Response 3.1.14** for further discussion.

As stated in Section 1.3 of the EA, the trust land acquisition will allow the Tribe to provide necessary housing within the Tribe's ancestral and historic territory for its current members and future generations and thereby would protect the Tribe's heritage and culture by ensuring existing and future generations are afforded the ability to live under tribal governance as a community within the Tribe's ancestral and historic land holdings. Providing the Tribe with a land base upon which existing and future generations of tribal members can live in close proximity to one another will promote cultural preservation.

Refer to **General Response 3.1.5** regarding the number of housing units necessary to meet the Tribe's purpose and need.

P328-23 Comment noted. The text has been updated in Section 1.6 of the Final EA to include a Section 401 permit.

P328-24 As stated in Section 4.1.8 of the EA, following approval of 25 CFR Part 151 Trust Acquisition, all of the project parcels would be exempt from County land use regulations.

P328-25 Comment noted. The text has been updated in Section 2.1 of the Final EA to refer to the appropriate project alternative.

P328-26 Comment noted. Refer to **General Response 3.1.13** regarding the appropriateness of the alternatives analyzed with the EA. Alternatives considered must include those that offer substantial environmental advantages over Alternative A but are not required to be the alternative that is presumed to most reduce the intensity of impacts. In fact, Concept Plan Option M.0.1 was selected as the representative layout of the eight one-acre concept plans to be evaluated in detail within the EA because the layout includes the largest distance between assignment clusters and therefore covers a majority of the area that could be developed once a concept plan is approved by the Tribe for development. Accordingly, Concept Plan Option M.0.1 represents the maximum potential environmental impacts that could occur with implementation of any of the one-acre concept plans and was selected for this reason.

P328-27 If the Proposed Action were approved, the residential units on the project site would not be required to comply with the "Build it Green" 2005 Green Building Guidelines for New Home Construction or the Leadership in Energy and Environmental Design (LEED) for Homes criteria certifications as the Tribe would be the governing body. Regardless, the Tribe is committed to incorporating these standards. The bullet points provided under the Green Building heading in Section 2.2.10 along with the BMPs and protective measures listed in Section 2.2.10 are specific examples of the elements that will be included in the proposed development to support this commitment.

P328-28 Comment noted. The text has been updated throughout Section 2.0 of the Final EA to appropriately refer to residential lots.

P328-29 Refer to the response to **Comment P328-22** for an explanation as to how Alternatives A and B meet the Tribe's purpose and need. Refer to **General Response 3.1.2** regarding the TCA.

P328-30 As stated in Section 2.2.7 of the EA, the rural roadways would be constructed using standards comparable to Santa Barbara County requirements.

P328-31 Refer to the response to **Comment L3-16** for an explanation of the proposed start date of the project. As stated in Section 2.2 of the EA, construction would occur over a period of four to nine years. Construction of the selected project alternative would emit a finite amount of pollution during the construction phase of the project. Therefore, the shortest time period estimated (four years) is used in Section 4.3 of the EA to estimate the greatest annual emissions of each pollutant. The construction air quality analysis provided in the EA is adequate because it analyzes construction impacts for the most conservative scenario, four years. It is not known at this time when or at what rate the residences and facilities would be constructed.

The Tribe cannot anticipate the exact number of residences that will be needed each year. The Tribe has 136 tribal members and approximately 1,300 lineal descendants; however, the Tribe cannot predict the exact number of those members and descendants that will want to relocate to the project site; nor can the Tribe predict in exactly which year they will want to relocate. Hence, a phased plan more specific than is presented in Section 2.0 is not available.

P328-32 As shown in Figure 2-2 of the EA, the one-acre residential lots and tribal facilities of Alternative B are clustered into three general areas. Substantial open space exists under the site plan of Alternative B, in particular compared to the open space existing under the site plan of Alternative A, as shown in Figure 2-1 of the EA. The commenter is correct that implementation of Alternative B would have potential impacts to cultural resources (as discussed in Section 4.2.5 of the EA), to drainage channels (as discussed in Section 4.2.4 of the EA), and to visual resources (as discussed in Section 4.2.12 of the EA). Adverse impacts to cultural resources and biological resources would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.5 and 5.4, respectively. Adverse impacts to visual resources would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA. Refer to the response to **Comment P328-22** for an explanation as to how implementation of Alternative B would achieve the Tribe's purpose and need. Refer to **General Response 3.1.2** regarding the TCA.

P328-33 through **P328-35**

Comment noted. The Tribe updated the development plan for the tribal facilities as the development of an exhibition hall is no longer economically feasible; refer to **General Response 3.1.17** for further discussion. A parking lot that would be constructed to support the proposed tribal facilities would be located within the area identified as "Government" in Figure 2-2 of the Final EA. As the EA is a planning level document, the finalized site plan of the tribal facilities, including the exact location of the parking lot, is not yet available. Lighting in the parking lot of the tribal facilities would be consistent with the lighting proposed for Alternative A; text has been updated in Section 2.3 of the Final EA to provide clarity.

P328-36 The Tribe's development plans for the project site are included in Appendix N of the EA; refer to **General Response 3.1.12** for further discussion of regulation of future development on the project site.

P328-37 The Tribe updated the development plan for the tribal facilities as the development of an exhibition hall is no longer economically feasible; refer to **General Response 3.1.17** for further discussion. Refer to the response to **Comment P328-33** regarding the location of the proposed parking lot.

P328-38 Comment noted. The commenter is correct that, given that the No Action Alternative, discussed in Section 2.4 of the Final EA (refer to **General Response 3.1.18** regarding revisions to the No Action Alternative in the Final EA), would result in the lowest amount and magnitude of environmental impacts, it would indeed be the environmentally superior alternative.

P328-39 Refer to the response to **Comment L3-25** for an explanation as to how the cut and fill of Alternatives A and B would be near-balanced.

P328-40 Comment noted. The impacts related to the removal of critical habitat for a protected species are discussed in Sections 4.1.4, 4.2.4, and 4.4.4 of the EA. The mitigation measures proposed to reduce or avoid impacts are detailed in Section 5.4 of the EA.

P328-41 As discussed in Sections 4.1.10 and 4.2.10 of the EA, noise generated by construction equipment on site would be approximately 77.0 dBA at the nearest sensitive receptor for development of either alternative. However, as discussed in Section 4.1.10, construction traffic associated with development of Alternative A would increase the existing ambient noise level by approximately 3.6 dBA, Leq, whereas construction traffic associated with development of Alternative B would increase the existing ambient noise level by approximately 4.9 dBA, Leq. Accordingly, impacts related to construction noise would be slightly greater under Alternative B compared to Alternative A, as stated in Section 2.5 of the EA.

P328-42 Comment noted. As discussed in Section 5.5, prior to the final siting of all development components of the selected project alternative (residential units, utility corridors, etc.), a qualified archeologist shall identify appropriate buffer zones around each cultural resource. Refer to **General Response 3.1.8** regarding the adequacy and completeness of the analysis of impacts to cultural resources.

P328-43 Comment noted. The analysis of impacts to visual resources in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA was prepared per the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Refer to **General Response 3.1.14** for further discussion as to the evidence that supports the conclusion that Alternatives A and B are similar in visual character to that of the existing setting.

P328-44 Lands designated as Agricultural Preserve in the County are lands that are under a Williamson Act contract. The Williamson Act and associated potential impacts are discussed in Sections 4.1.1, 4.2.1, 4.3.1, and 4.4.1 of the EA.

P328-45 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-46 The 1-hour CO NAAQS has been added to Table 3.3-1 in Section 3.3 of the Final EA.

P328-47 Comment noted. The statement regarding CEQA has been removed from Section 3.3.1 of the Final EA.

P328-48 Comment noted. The commenter believes the hyperlink to the Santa Barbra County Climate Action Strategies is not operational; however, this is inaccurate as the hyperlink is operational.

P328-49 Comment noted. Sensitive receptor locations are provided under the Sensitive Receptors heading in Section 3.3.2 of the EA. The existing air quality setting was prepared in accordance with CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. A map is not necessary.

P328-50 An analysis of Carbon Monoxide Hotspots has been performed; no adverse impact was found. A discussion of the analysis and findings has been added to Sections 4.1.3 and 4.2.3 of the EA.

P328-51 A description of Section 7 consultation can be found in Section 7of the ESA (16 USC § 1536). A description of the permits available under Section 10 can be found in Section 10 of the ESA (16 USC § 1539).

P328-52 The area on Figure 3-4 of Section 3.4 of the EA referenced by the commenter is also grassland.

P328-53 Refer to **General Response 3.1.16** regarding blue oaks and the Tribal Oak Tree Ordinance.

P328-54 Wetlands are defined based on the presence of hydric soils, the ratio of wetland-obligate vegetation to upland species, and presence of a water source. As explained in Section 3.4.1 of the EA, the National Wetlands Inventory (NWI; USFWS, 1976, 1981, 1984, and 2006) map does not identify any wetland features within the project site. Qualified biologists conducted preliminary delineations of waters of the U.S. during September 2011, March 2012, and April 2012 (refer to Appendix E of the EA). The ephemeral drainage, seasonal wetland swale, and vernal pools are considered potentially jurisdictional waters of the U.S., subject to Section 404 of the CWA. Mitigation measures included in Section 5.4.2 of the EA would reduce impacts to waters of the U.S., including complete avoidance of the seasonal wetland swale and vernal pools.

P328-55 Copies of special-status species searches of CNDDB and CNPS within the vicinity of the project site are included in Appendix E of the Final EA. A table detailing federally-listed special-status species and their potential to occur on the project site is included in Appendix E of the Final EA. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook to assess impacts to environmental resources. Section 3.4.1 of the EA describes special-status species and discusses their habitat needs; accordingly, the text therein presents a complete description of the existing biological resources at the project site.

P328-56 Refer to **General Response 3.1.8** for further discussion regarding the adequacy and completeness of the cultural resources analysis presented in the EA.

P328-57 and **P328-58**

Comments noted. Refer to **General Response 3.1.8** regarding the adequacy of and information provided in the cultural resources setting (Section 3.5 of the EA).

P328-59 The information presented in Section 3.6.2 describes the existing demographic and housing conditions of the Tribe and is consistent with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook (specifically, Appendix 18). The number of tribal members and available housing units on the Santa Ynez Reservation are part of the baseline used to assess impacts associated with environmental justice.

P328-60 New counts were collected at all study-area roadway segments and at all but three of the study-area intersections. New counts were collected on March 13, 2012 for Baseline Avenue east of Edison Street and Armour Ranch Road east of SR 154 and for all of the intersections,

except for SR 154/Grand Avenue, SR-154/Roblar Ave, and Edison St/SR-154. The SR 154/Grand Avenue count was taken on March 10 (P.M.) and March 15 (A.M.), 2011 and determined to be representative of existing conditions (traffic conditions in the Santa Ynez area have not changed substantially in the near past). The SR-154/Roblar Ave count was taken on May 12, 2011, and the Edison St/SR-154 count was taken on July 21, 2011; both were also determined to be representative of existing conditions. New counts taken on March 13, 2012 were also used for the analyses of the State Highway segments (SR 154 north of Edison Street, SR 154 south of SR 246, and SR 246 west of SR 154). The timeframe of traffic counts has been updated to specify the exact day of data collection in Section 3.7 of the Final EA.

P328-61 Comment noted. Significance criteria for Caltrans and County facilities are provided in Section 3.7.2 and Appendix I of the Final EA.

P328-62 As stated in Section 3.7 of the EA, the following minimum operating criteria have been established by the appropriate jurisdictional agencies for roadways in the project area roadway network:

- Caltrans' has established a LOS D minimal operating standard for state highways and intersections associated with state highways in the project area.
- The County has established a LOS B minimal operating standard for County roadways. The County LOS standard is based on the capacity of the roadway.

P328-63 The text in Section 3.7 of the EA was updated to reflect the 2010 Highway Capacity Manual (HCM).

P328-64 and **P328-65**

The LOS for two-way stop controlled intersections was performed using the County's methods, which provides an overall LOS for assessing impacts. This is the method that was used by the County for the SYVCP traffic analysis. The 2010 HCM was used for the roadway and intersection impact analyses.

P328-66 The measures of effectiveness for roadway segments SR-154 North of Edison Street and SR-154 South of SR-246-Amour Ranch Road shown in Table 3.7-4 of Section 3.7 of the EA are based on percent time following and speed, as indicated in the footnote of Table 3.7-4 and on the LOS sheets contained in the Technical Appendix of the TIS provided as Appendix I of the Final EA. The values shown in Table 3.7-4 for the roadway segment SR-246 from SR-154 to Solvang is based on signalized segments LOS, which are used to assess impacts pursuant to the County's and Caltrans' standards and is noted in the footnote of Table 3.7-4.

P328-67 Pursuant to the 2010 HCM, as well as criteria developed by Santa Barbara County Association of Governments (SBCAG) for the Congestion Management Program (CMP), LOS for motorists using a highway segment with intersections at regular intervals is based on operations at the intersections (where the delays occur). The segment of SR-246 from SR-154 to the City of Solvang is based on delay at the intersections along the roadway, which is consistent with the analysis used by the County for the SYVCP as well as analysis used by SBCAG for CMP monitoring.

P328-68 Comment noted. As stated in Section 3.8.2, the entire project site is zoned Agricultural II (AG-II-100), which specifies areas appropriate for agricultural land uses with a minimum gross lot area of 100 acres on prime and non-prime agricultural lands located within the County's Rural Area, with the intention of preserving land for long-term agricultural use (Santa Barbara County Code 35.21.020).

P328-69 Comment noted. Refer to **General Response 3.1.10** regarding the analysis of existing land uses in the vicinity of the project site and the inconsistencies with the SYVCP.

P328-70 The text has been updated in Section 3.8.2 of the Final EA to reflect the appropriate Santa Barbara County Code Section 35.21.030. It is unclear as to why the commenter believes the statement is misleading as the County Code 35.21.030 clearly indicates that single-family dwellings, residential accessory uses and structures, and residential agricultural units are permitted land uses within AG-II zoned areas. The County Code 35.21.030 permits these uses regardless of the expiration of the County Residential Agricultural Unit ordinance (35.42.210). It is also unclear as to why the commenter believes the text in Section 3.8.2 of the EA is inconsistent with the text in Section 3.12.1 of the EA, which states that the County Comprehensive Plan designation for the project site is Agriculture Zone Two (AG-II-100). The text in Section 3.12.1 states that Agriculture Zone Two (AG-II-100) allows all agricultural uses as well as low-density residential housing related to owner- or tenant-operated agricultural uses (Santa Barbara County, 2011b), which is consistent with the description provided in Section 3.8.2 of the EA.

P328-71 Comment noted. The text in Section 3.10 has been updated to reflect the accurate noise measurement sites and durations displayed in Table 3.10-6.

P328-72 Comment noted. The reference to Section 2, Figure 2-1, in Section 3.10 of the Final EA has been removed.

P328-73 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-74 Comment noted. The purpose of Figure 3-11 in Section 3.12 of the EA is to show representative scenic views of the project site and surrounding areas. A map depicting the exact location of each photograph is not necessary to understand the existing visual resources setting. Additionally, representative photographs of biological communities are shown in Figure 3-5a and Figure 3-5b of Section 3.4. The locations identifying where the photographs were taken within the project site are mapped on Figure 3-4 of Section 3.4.

P328-75 As discussed in Section 3.12, Baseline Avenue and Armour Ranch Road are also considered scenic rural roads. To protect local aesthetics within the SYVCP area, a Design Control Overlay has been applied to areas valued as scenic and visual resources. All development under County jurisdiction that is visible from public viewing areas, and/or is a non-agricultural structure, and/or is an agricultural structure greater than 1,000 square feet must be reviewed by the County Board of Architectural Review to be determined acceptable within these areas (Santa Barbara County, 2009a). If the Proposed Action is approved, the project site would no longer be within the County's jurisdiction and the existing Design Control Overlay would no longer be applicable. Additionally, the proposed development under Alternatives A and B is designed to be consistent with the character and style of the Santa Ynez Valley; refer to **General Response 3.1.14** for further discussion.

P328-76 Relative to the construction proposed for Parcels 2, 3, and 4 under Alternative A, the construction on Parcel 1 would be minimal.

P328-77 Comment noted. If the Proposed Action and development are approved, the final layout of the equestrian and passive trails would be determined when the development plans are finalized. As stated in Section 2.2.8, stormwater would be detained on-site and would be discharged at rates equivalent to pre-development conditions.

P328-78 Comment noted. The recommendations provided in Appendix D of the EA present various options and suggestions for further reducing impacts however are not necessary to reduce or avoid any adverse impact and therefore are not necessary to include as mitigation. If the Proposed Action and development are approved, the recommendations will be considered when developing the final development plans.

P328-79 Alternative A is designed to be consistent with the rural character of the Santa Ynez Valley. Although County ordinances would not be applicable if the project site were taken into trust, the residences under Alternative A would be designed to be consistent with the architecture and aesthetic aspects of surrounding residences. Refer to **General Response 3.1.14** for further discussion.

P328-80 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-81 The development footprint of the 143 residences would disturb approximately 93 acres of land. The trenching for water connections, resurfacing of access roads, building of roads and driveways, wastewater treatment plant, and trenching for utilities that would occur on the project site would disturb approximately 51 acres of land. Accordingly, 144 acres of land would be disturbed under Alternative A. Text has been added to Section 4.1.3 of the Final EA to provide clarity.

P328-82 The following mitigation measure, presented in Section 5.3 of the EA, is the mitigation measure used in the input file for the URBEMIS air quality model that would reduce diesel particulate matter (DPM) by 50 percent:

> Through contractual obligations, the Tribe shall ensure heavy duty construction equipment is equipped with diesel particulate matter filters.

Additional text has been added to Section 5.3 of the EA to provide clarification. Because the text in Section 4.1.3 of the EA provides a clear reference to the mitigation measures in Section 5.3 of the EA, including an explanation of these mitigation measures in Section 4.1.3 of the EA is not warranted. Refer to **General Response 3.1.6** regarding updates to the air quality analysis included in the Final EA.

P328-83 An aerial view of existing oak trees is included as Figure 1-3 of Section 1.0 of the EA. The EA is a planning level document. Oak trees that would be required to be removed with implementation of the selected project alternative would be determined by the site contractor prior to construction. A qualified arborist will survey trees which have been slated for removal by the contractor prepare an Arborist Report describing findings and recommendations; refer to **General Response 3.1.16** for further discussion.

P328-84 Surveys were performed for both VPFS and CRLF on the project site in September 2011, March and April 2012, and July of 2013. Potential CRLF ponds located on adjacent property were not surveyed because the property is private. Because surveys are designed to focus on presence or absence of a federally-listed species such as CRLF on the project site, omitting surveys of off-site ponds due to restricted private property access is a reasonable action. Potential impacts, avoidance measures, and associated discussion are in Section 7.2 of the BA, which is included as Appendix E of the EA.

P328-85 Refer to **General Response 3.1.8** regarding the adequacy and completeness of the analysis of impacts to cultural resources. Mitigation measures included in Section 5.5 require the identification of buffer zones around the 16 cultural resources and the presence of a Tribal Cultural Resource Monitor during construction activities within 500 feet of buffer zones to ensure protection of said resources. The selected alternative cannot be designed to impact cultural resources as the mitigation does not allow for such; accordingly, the analysis of

potential impacts to cultural resources and associated avoidance measures are within the EA and are not deferred to a later phase of planning.

P328-86 As stated in Section 4.1.5, the project region contains known paleontological resources and the geology of the project site is consistent with those areas of known resources. However, there are no known paleontological resources on the project site and none were observed during the site reconnaissance visits in 2011 and 2012. Hence, a discussion of how excavation may encounter known resources is impossible given there are no known resources. The mitigation included in Section 5.5 would reduce impacts to unknown cultural, including paleontological, resources.

P328-87 The Final EA has been updated with the most up-to-date information available pertaining to the Tribe's offer of a first draft payment-in-lieu of taxes agreement to the County. The information presented in Section 4.1.6 remains correct: the County has not accepted the Tribe's offer and no further discussions have ensued.

P328-88 In response to the comment, the trip distribution and assignment of project-generated traffic were reviewed. All A.M. peak hour trips are correctly assigned. All P.M. peak hour trips are correctly assigned, with one exception: six extra trips were erroneously assigned at the SR 246/SR 154 intersection. Appendix I of the EA reported a total of 141 P.M. peak hour trips at the SR 246/SR 154 intersection; however, the correct number of trips is 135 P.M. peak hour trips. Nevertheless, the erroneous trip assignment did not affect the conclusions of the TIS. As shown in Sections 4.1.7, 4.2.7, and 4.4.7 of the EA, the SR 246/SR 154 intersection is forecast to operate at LOS F during the P.M. peak hour under near-term with project and cumulative with project conditions. Correcting the trip assignment (135 P.M. peak hour trips instead of 141 P.M. peak hour trips) also results in LOS F operations at the SR 246/SR 154 intersection during the P.M. peak hour under these conditions. Accordingly, the area-wide evening commute peak hour therefore occurs from 4:30 P.M. to 5:30 P.M., as stated in Section 4.1.7 of the EA. An updated TIS is included as Appendix I of the Final EA.

P328-89 Comment noted. The near-term and horizon years refer to operation of the project, not construction; therefore, it is not appropriate to discuss operational terms in the construction analysis. Near-term refers to the operation year 2017 and the horizon year is 2030.

P328-90 As stated in Sections 4.1.7 and 4.2.7 of the EA, the project would not generate pedestrian trips, bicycling activity, or transit riders along Baseline Road, Armour Road, SR-154, SR-246, or the other public roads in the area.

P328-91 Refer to the responses to **Comments P328-64** and **P328-65** regarding the application of overall LOS.

P328-92 The measures of effectiveness for roadway segments SR-154 North of Edison Street and SR-154 South of SR-246-Amour Ranch Road shown in Table 4-6 of Section 4.1.7 of the EA are based on percent time following and speed, as indicated in the footnote of Table 4-6 and on the LOS sheets contained in the Technical Appendix of the TIS provided as Appendix I of the Final EA. The values shown in Table 4-6 for the roadway segment SR-246 from SR-154 to Solvang is based on signalized segments LOS, which are used to assess impacts pursuant to the County's and Caltrans' standards and is noted in the footnote of Table 4-6.

P328-93 Since the Tribe does not have jurisdiction over State, County, or local roadways, it cannot provide a schedule of completion of traffic improvements. Recommended traffic improvements to State, County, or local intersections are subject to the appropriate jurisdiction's schedule. The Tribe provides reasonable mitigation in Section 5.7 of the EA to reduce project-related adverse traffic impacts. If the Proposed Action and development are approved, the Tribe is committed to providing a fair share contribution per the mitigation measures. Given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, the TIS was updated and is included as revised Appendix I to the Final EA; the results are incorporated into the appropriate sections of the Final EA.

P328-94 LOS results from the mitigation measures are provided in Section 5.7 and Appendix I of the Final EA. Implementation of roundabouts at impacted intersections would result in an LOS A, and implementation of signals at impacted intersections would result in an LOS B, both of which are acceptable under the State and County's significance criteria. Given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, the TIS was updated and is included as revised Appendix I to the Final EA; the results are incorporated into the appropriate sections of the Final EA.

P328-95 The Tribe does not have jurisdiction over Baseline Avenue or Amour Ranch Road. Any need for turn lanes or expansion of these roadways would be completed by the jurisdictional agency, the County. As shown in Appendix I of the EA, both roadways operate as acceptable under the County's significance criteria with the addition of project traffic. No further analysis is warranted. Given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, the TIS was updated and is included as revised Appendix I to the Final EA; the results are incorporated into the appropriate sections of the Final EA.

P328-96 As discussed in Appendix I of the EA, site access would occur at one point along Amour Ranch Road and two points along Baseline Avenue. It was determined that site access should be stopped controlled and signalization is not warranted. As shown in Figures 2 and 3 in Appendix I of the EA, the nearest intersection or driveway to the proposed driveway is greater than 1,300 feet. Due to the small volume of project related traffic and the distance

between project access points and other existing facilities, the analysis provided in Appendix I of the EA is reasonable pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook; therefore, no additional analysis is warranted.

P328-97 Comment noted. The roadway segment of SR-154 between SR-246 and Edison Road was not included in the traffic study because the intersections SR-154/SR-246 and Edison Road/SR-154 are analyzed. These two intersections control the flow of traffic along the segment of SR-154 between SR-246 and Edison Road; therefore, if the intersections are operating at an acceptable level, then the roadway segment between them would operate at an acceptable level. As shown in Sections 4.1.7 and 4.2.7 and Appendix I of the EA, these intersections would operate at or above the County's and Caltrans' LOS D significance criteria with mitigation. Given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, the TIS was updated and is included as revised Appendix I to the Final EA; the results are incorporated into the appropriate sections of the Final EA.

P328-98 Traffic counts were collected at all study-area County and State roadway segments and intersections (refer to the response to **Comment P328-60** for dates of collection), and the count data are presented in the Technical Appendix to Appendix I of the EA. The traffic counts collected in 2011 at SR 154/Grand Avenue, SR-154/Roblar Ave, and Edison St/SR-154 were determined to be representative of existing 2012 conditions (traffic conditions in the Santa Ynez area have not changed substantially in the recent years). The statement in Appendix I of the EA that "existing data is no longer representative of existing conditions" refers to all traffic count data except the data collected at SR 154/Grand Avenue, SR-154/Roblar Ave, and Edison St/SR-154. Traffic counts were re-collected for all other intersections and roadway segments in March 2012 to ensure the data are representative of existing 2012 conditions.

P328-99 LOS significance criteria is provided on page 6 and 7 of Appendix I of the EA.

P328-100 Comment noted. Refer to the response to **Comment P328-63** regarding methodology used in the TIS provided as Appendix I of the EA.

P328-101 The measures of effectiveness are indicated in the footnotes of Tables 3, 8, 11, 14, and 17 of Appendix I of the EA; refer to the responses to **Comments P328-66** and **P328-92** for further discussion.

P328-102 Refer to the response to **Comment S1-03** regarding the appropriateness of the measures of effectiveness used in the analysis. Refer to the responses to **Comments P328-66** and **P328-92** regarding which measures of effectiveness were used per each roadway and intersection.

Refer to the response to **Comment P328-63** regarding the HCM used in the analysis presented in the EA.

P328-103 Refer to the response to **Comment S1-03** regarding minor street approach.

P328-104 Comment noted. Refer to the response to **Comment S1-02** regarding the use of the Peak Hour Factor.

P328-105 Refer to the response to **Comment P328-88** regarding the A.M. and P.M. peak hour volumes.

P328-106 Refer to response to **Comment P328-96** regarding evaluation of safety and operation for the three project driveways located on Baseline Avenue and Amour Ranch Road.

P328-107 Refer to the response to **Comment S1-03** regarding minor street approach and LOS.

P328-108 The commenter does not provide supporting analysis that indicates "queues spilling onto through lanes, which impacts safety and operation." The left-turn movements at signalized intersections along SR 246 do not "fail" under near-term or cumulative conditions (refer to Appendix I of the Final EA). The overall operation of signalized intersections is based on the average delay for all movement pursuant to methods outlined in the 2010 HCM. Left-turn delays at signalized intersections are typically higher than delays for through and right-turn movements since left-turn movements are typically lower in volume and generally receive less green light time. The TIS indicates that four of the five intersections along SR-246 will degrade to LOS E and LOS F under cumulative and cumulative with project conditions; mitigation measures are outlined in Section 5.7 of the EA for those locations. The mitigation measures are consistent with what is being planned by the County for the Santa Ynez area since they are derived from the adopted SYVCP. Implementation of mitigation provided in Section 5.7 of the EA would result in roundabouts or signalized intersections operating at an acceptable LOS under the County's and Caltrans' significance criteria. Given the revisions to the tribal facilities under Alternative B (refer to **General Response 3.1.17**) and an updated cumulative environment, the TIS was updated and is included as revised Appendix I to the Final EA; the results are incorporated into the appropriate sections of the Final EA.

P328-109 The Tribe does not have jurisdiction over installation of signals at County or State controlled intersections. It is therefore not appropriate for the Tribe to conduct a signal warrant analysis; the applicable jurisdictional agency, either Caltrans or the County, will provide signal warrant analysis if it determined signal control is the best mitigation.

P328-110 The Tribe does not have jurisdiction over the geometry of the proposed mitigation, and it is therefore not appropriate for the Tribe to identify the geometry of the proposed mitigation

measure. The applicable jurisdictional agency will provide the geometry when the intersection control is selected.

P328-111 Alternative A includes the land trust action; the proposed development would not be approved without approval of the trust acquisition. Accordingly, excluding consideration of the impacts of the Proposed Action when analyzing the impacts of the proposed development is inconsistent with the components of Alternative A as described in Section 2.2 of the EA.

P328-112 As stated under the Water Supply heading in Section 4.1.9 of the EA, adverse impacts to surface water and groundwater resources from the development of the water supply system for Alternative A are addressed under Section 4.1.2 of the EA. Repeating this information in multiple sections of the EA would be redundant.

P328-113 and **P328-114**

Text was added to Section 4.1.9 of the Final EA to refer the reader to Section 4.1.2 of the Final EA regarding impacts of the proposed WWTP and to Appendix C of the EA regarding specifications of the proposed WWTP. Repeating this information in multiple sections of the EA would be redundant.

P328-115 Refer to the response to **Comment L3-12** regarding project induced population growth and evidence to support the conclusion that Alternative A would have a negligible impact to local school districts.

P328-116 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-117 and **P328-118**

Design standards are presented in Section 2.2.10 of the EA. Visual renderings are not necessary as the text in Sections 2.2 and 4.1.12 describe the proposed development. Refer to **General Response 3.1.14** for further discussion of the potential impacts of Alternative A to visual resources. It is unclear the commenter's intent behind the comment that the "project would double the number of residential structures on the project site" as there is only a single residential structure (ranch house) existing on the project site while Alternatives A and B both propose 143 housing units.

P328-119 Refer to the response to **Comment P328-78** regarding recommendations included in Appendix D of the EA.

P328-120 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-121 Refer to response to **Comment P328-31** regarding the timing of development as related to air quality analysis.

P328-122 Refer to the response to **Comment P328-82** for a discussion as to where mitigation measures are explained within the EA. Because the text in Section 4.2.3 of the EA provides a clear reference to the mitigation measures in Section 5.3 of the EA, including an explanation of these mitigation measures in Section 4.2.3 of the EA is not necessary.

P328-123 Refer to the response to **Comment P328-83** regarding the location of oak trees on the project site.

P328-124 The discussion of impacts related to CRLF presented in Section 4.2.4 of the EA is sufficient per the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Potential impacts to CRLF are further detailed in Section 7.2 of the BA (Appendix E of the EA).

P328-125 Refer to **General Response 3.1.8** regarding the adequacy and completeness of the analysis of impacts to cultural resources.

P328-126 The commenter is correct that the methodologies for determining project-related impacts for Alternative B are the same as Alternative A, as stated in Section 4.2.6 of the EA. It is unclear what is meant by the commenter's statement "please refer to the comments above," and no response to this statement is provided.

P328-127 The commenter is correct that the methodologies for determining project-related impacts for Alternative B are the same as Alternative A, as stated in Section 4.2.7 of the EA. Refer to the responses to **Comments P328-88** to **P328-110** regarding the commenter's statement "refer to the Transportation and Traffic comments noted above."

P328-128 Alternative B includes the land trust action; the proposed development would not be approved without approval of the trust acquisition. Accordingly, excluding consideration of the impacts of the Proposed Action when analyzing the impacts of the proposed development is inconsistent with the components of Alternative B as described in Section 2.3 of the EA.

P328-129 The commenter states that "impact assessment methodology is the same," but it is unclear as to what impact assessment methodology is the same as. Assuming the commenter is referring to the public services impact assessment methodology, the commenter is correct that the analysis is the same, as stated in Section 4.2.9 of the EA.

The commenter states "refer to comments above," but it is unclear which above comments should be referred to. Assuming the commenter is indicating the previous public service

comments in the commenter's Table 1 – Comments on Text and Appendix I – TIS, refer to responses to **Comments P328-112** through **P328-115**.

P328-130 The commenter states that "impact assessment methodology is the same," but it is unclear as to what the impact assessment methodology is the same as. Assuming the commenter is referring to the noise impact assessment methodology, the commenter is correct that the analysis is the same, as stated in Section 4.2.10.

The commenter states "refer to comments above," but it is unclear which above comments should be referred to. Assuming the commenter is indicating the previous noise comments in the commenter's Table 1 – Comments on Text and Appendix I – TIS, refer to responses to **Comments P328-71** and **P328-72**.

P328-131 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-132 Refer to **General Response 3.1.14** regarding the impacts to visual resources from implementation of Alternative B.

P328-133 Design standards are presented in Section 2.2.10 of the EA. If the project site is taken into trust, County and local ordinances and guidelines related to the design and aesthetic characteristics of development would not be applicable. However, all residential structures would be designed to be compatible with surrounding residential structures and the rural character of the Santa Ynez Valley; text was added to Sections 2.2 and 2.3 of the Final EA to clarify this. As discussed in Section 5.12 of the EA, implementation of the protective measures and BMPs identified in Section 2.2.10 of the EA would reduce or avoid adverse impacts to visual resources; refer to **General Response 3.1.14** for further discussion.

P328-134 As stated in Section 3.12, the project site is visible along its entire length from SR-154; refer to **General Response 3.1.13** as to how the design of Alternatives A and B would preserve scenic views from SR-154. The analysis of impacts to visual resources presented in the EA was prepared pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook; photo simulations are not necessary to describe the potential impacts.

P328-135 Refer to **General Response 3.1.18** regarding revisions to Alternative C in the Final EA.

P328-136 As stated in Sections 4.1.8 and 4.2.8 of the EA, if the trust acquisition is approved, all project parcels would be except from County and local land use regulations. Accordingly, future development on the project site would not be subject to County and local land use regulations (refer to **General Response 3.1.12** for further discussion). The discussion in Section 4.4.1 of the EA is referring to future off-site development; text was added to Section 4.4.1 of the Final

EA for clarification. The development on the project site would be designed to be consistent with surrounding structures and the rural character of the Santa Ynez Valley.

P328-137 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-138 If the Proposed Action were approved, County regulations on the project site would not be applicable and including a discussion of the County's regulations relevant to endangered species in the EA is therefore unnecessary. Those species with the potential to occur in off-site habitat within the immediate vicinity of the proposed development would only be influenced by activities with consequences which could extend beyond the borders of the project site. Identified, non-biological effects and their potential to influence biotic resources have been discussed in each respective section within the EA. In addition, Section 4.1.4 and Section 4.2.4 of the EA specifically address biological influences of the project to on- and off-site resources including large- and small-scale movements of native resident or migratory species, wildlife corridor accessibility, and potential effects on nursery sites by the project alternatives.

P328-139 Refer to the responses to **Comments P328-56** through **P328-58**, **P328-85**, and **P328-86** for a discussion as to the adequacy and completeness of the analysis of impacts to cultural resources.

P328-140 Comment noted. Text was added to Section 4.4.6 of the Final EA to provide clarification regarding the timeline of construction employment benefits.

P328-141 Refer to responses to **Comments P328-94** through **P328-110** regarding Appendix I of the Final EA.

P328-142 As stated in Section 4.4.8, any surrounding cumulative projects not located on tribal trust lands would be subject to existing local land use regulations and the implementation of Alternatives A and B would not result in changes to surrounding land use patterns. Any changes would be attributable to County policies only. Development of the selected project alternative would not establish a precedent for surrounding lands as surrounding lands would remain within County and local jurisdictions and subject to County and local policies. Refer to the response to **Comment L3-12** regarding project induced population growth.

P328-143 Comment noted. Text has been updated in Section 4.4.10 of the Final EA to include parks and schools.

P328-144 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-145 Refer to the response to **Comment P328-133** regarding potential impacts to visual resources.

P328-146 Refer to the response to **Comment P328-134** regarding potential impacts to visual resources.

P328-147 Comment noted. The analysis of indirect effects was prepared pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. The analysis considered effects which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Text was added to Section 4.5.1 to clarify that indirect effects to all resources are considered.

P328-148 Comment noted. Text was added to Section 4.5.2 of the Final EA to provide an analysis of orderliness of growth entailed by the Proposed Action and project alternatives. Elements of the Santa Barbara County Comprehensive Plan and SYVCP relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to the Santa Barbara County Comprehensive Plan and SYVCP are evaluated throughout Section 4.0 of the EA. Refer to the response to **Comment L3-09** for further discussion regarding the Proposed Action's consistency with local and regional land use plans.

P328-149 As stated in Section 5.1 of the EA, the mitigation measures related to land resources specifically require:

- Compliance with the NPDES permit and development of a SWPPP that would include, at a minimum, the BMPs listed in Section 5.1;
- All workers be trained in proper handling and storage of chemicals; and
- All contractors be trained on the potential environmental damages resulting from soil erosion.

No revisions or updates to the text in Section 5.1 of the EA are necessary.

P328-150 The intent of the comment is unclear. The commenter appears to be referencing both land resources as discussed in Section 5.1 of the EA and visual resources. Assuming the commenter is only referring to visual resources, the measures and BMPs outlined in Section 2.0 of the EA would reduce or avoid adverse impacts related to visual resources as the only potential adverse impacts are related to signage and lighting. As discussed in Sections 4.1.12, 4.2.12, and 4.4.12, Alternative A and B would have no adverse impacts related to existing scenery; refer to **General Response 3.1.14** for discussion.

P328-151 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-152 Comment noted. As stated in Sections 4.1.3, 4.2.3, and 4.4.3 of the EA, implementation of Alternative A or B would not result in adverse impacts to air quality but mitigation measures are included in Section 5.3 of the EA to further reduce impacts to air quality. The air quality analysis presented in the Final EA was performed using the CalEEMod (refer to **General Response 3.1.6** for further discussion) with no mitigation included; as stated in Sections 4.1.3, 4.2.3, and 4.4.3 of the Final EA, the impact of Alternative A and B to air quality was determined to be minimal. The Tribe elected to include additional measures in Section 5.3 of the EA to further reduce impacts to air quality; some additional measures were added to Section 5.3 of the Final EA.

P328-153 A Monitoring and Reporting Program Plan (MRPP) will be prepared that will specify the timing and responsible party for ensuring mitigation is implemented.

P328-154 Refer to responses to **Comments P328-83**, **P328-84**, **P328-123**, **P328-124**, and **P328-138** for responses to previous comments regarding methodology of impact assessment and need for additional studies.

P328-155 Refer to **General Response 3.1.8** regarding the adequacy and completeness of the analysis of impacts to cultural resources. Refer to the response to **Comment P328-85** for an explanation as to how mitigation for cultural resources is not deferred to a later phase of planning.

P328-156 As discussed in Section 4.1.6, the tax on the project site was approximately 0.01 percent of the County's total tax revenue. In determining impacts to the County's tax base, the 0.01 percent loss in property taxes is de minimis and would not lead to any adverse physical effects, and therefore would not be significant under NEPA. The payment-in-lieu of taxes agreement proposed by the Tribe was not required pursuant to NEPA.

P328-157 The commenter is correct that no funding mechanism is identified. Since the Tribe does not have jurisdiction over the transportation facility, it can only provide a fair share contribution. The Tribe cannot guarantee the identified mitigation will be implemented, even if the Tribe's contribution was 100 percent.

P328-158 Refer to the response to **Comment L3-18** regarding the insignificant percentage of farmland that would be converted to other land uses under Alternatives A and B.

P328-159 Refer to the responses to **Comments P328-111** and **P328-128** regarding the approval of the trust land acquisition as it relates to the development of a project alternative.

P328-160 As discussed in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9, no adverse impacts related to noise would result with implementation of the project alternatives. Accordingly, no mitigation measures are necessary.

P328-161 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P328-162 As stated in Section 2.2.10 of the EA, the measures and BMPs included therein are part of the project design; hence the Tribe is committed to implementing these measures and BMPs. Refer to the responses to **Comments P328-74**, **P328-75**, **P328-117**, **P328-118**, and **P328-132** through **P328-134** regarding the adequacy and completeness of the analysis of impact to visual resources presented in the EA.

P328-163 Comment noted. The Tribe consulted with federal agencies pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Consultation with the Army Corps of Engineers and the RWQCB during preparation of the EA is not necessary to analyze the impact to waterways. Pursuant to the CWA, the Tribe will apply to the appropriate agencies to obtain the necessary permits and regulatory approvals if the Proposed Action is approved (i.e. Section 404 Permit, SWPPP, etc.).

P328-164 Comment noted. The Tribe consulted with local agencies pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook.

P328-165 As shown in Table 2-4 of Appendix C of the EA, residential indoor use would require 51 AFY, residential landscape drought-tolerant irrigation would require 265 AFY, and residential lawn irrigation would require 64 AFY; this equates to a gross water demand of 380 AFY under Alternative A. As shown in Table 2-4 of Appendix C of the EA, use of tertiary treated wastewater for irrigation would reduce water demand by 45 AFY. Accordingly, the net water demand for Alternative A is 335 AFY, as stated in Section 4.1.2 of the EA. As shown in Table 2-5 of Appendix C of the EA, residential indoor use would require 51 AFY, residential landscape drought-tolerant irrigation would require 57 AFY, and residential lawn irrigation would require 43 AFY, and the tribal facilities would require 4 AFY; this equates to a gross water demand of 155 AFY under Alternative B. As shown in Table 2-4 of Appendix C of the EA, use of tertiary treated wastewater for irrigation would reduce water demand by 49 AFY. Accordingly, the net water demand for Alternative B is 106 AFY, as stated in Section 4.2.2 of the EA. In response to comments received regarding water use of Alternatives A and B on the project site, the Tribe made revisions to the development plans under Alternatives A and B, reducing overall anticipated water demands; refer to **General Response 3.1.9** for further discussion.

The table title, column headings, row headings, footnotes, and associated discussion in the text of Appendix C of the EA accurately and appropriately describe Table 3-9 of Appendix C of the EA, which summarizes the expected irrigation supply of recycled water. It is unclear why the commenter believes Table 3-9 is not well explained or annotated as the commenter does not provide specific details; hence a detailed response cannot be provided.

Refer to the response to **Comment P311-09** regarding the determination of water demand in Appendix C of the EA

P328-166 Comment noted. The table titles, column headings, row headings, footnotes, and associated discussion in the text of Appendix C of the EA accurately and appropriately describe Tables 2-1 through 2-5 of Appendix C of the EA. In Tables 2-1, 2-2, 2-4, and 2-5 of Appendix C of the EA, the information listed under the column header "Unit" indicates the number of units being considered, and the term "unit" is defined under the column header "Type of Unit" per each table. In Table 2-3 of Appendix C of the EA, the information under the column header "Unit" defines the term "unit," the information under the column header "Demand" indicates the number of "units," and the information under the column header "Quantity" indicates the number of "units" pear each year. The text associated with each table of Appendix C of the EA explains assumptions used in the tables.

P328-167 The Tribe developed and defined the events expected to occur at the tribal facilities, and the events listed and number of attendees per event presented in Table 2-3 of Appendix C of the EA are based on these defined events. Outside of the described and listed 100 events with a maximum of 1,000 attendees per event, normal administrative functions of the tribal facilities are expected, based on the estimated staffing of 75 employees. The irrigation demands of the tribal facilities would be minimal and would be met using recycled water and non-potable irrigation water, as described in the footnote to Table 2-3 of Appendix C of the Final EA. In response to comments received regarding water use of Alternatives A and B on the project site, the Tribe made revisions to the development plans under Alternatives A and B, reducing overall anticipated water demands; refer to **General Response 3.1.9** for further discussion.

P328-168 Comment noted. The operational demands have been updated in Appendix C of the Final EA to include both indoor and outdoor demand as well as to reflect the changes in water demand given the revisions to the project components under Alternatives A and B (refer to **General Responses 3.1.9** and **3.1.17**). Under Alternative A, the average day demand is 0.154 mgd, and a factor of 2 was used to derive maximum day demand of 0.31 mgd. The operational storage for Alternative A at 25 percent of maximum day demand equals 76,910 gallons. Under Alternative B, the average day demand is 0.074 mgd, and a factor of 2 was used to derive maximum day demand of 0.148 mgd. The operational storage for Alternative B at 25 percent of maximum day equals 37,013 gallons. Corresponding total storage requirements for Alternatives A and B are 330,000 gallons and 300,000 gallons, respectively.

P328-169 Refer to **General Response 3.1.9** regarding the long term reliability of the potable water supply.

P328-170 Appendix C of the EA (page 2-5) describes the hydrogeologic setting of the project site and references the 2008 SBCWA Groundwater Report. The geologic map provided as Figure 2-1

in Appendix C of the EA uses a USGS topographic base map from which the location of the project site with respect to local water courses, the Santa Ynez River, and the community of Santa Ynez can be determined. Other project location maps of varying scale are also in the EA that may be used for the same purpose (e.g. Figure 1-1 and 1-2 of Section 1.0 of the EA). Maps published by the County within the referenced 2008 SBCWA Groundwater Report, which are reproduced in the more recent 2011 SBCWA Groundwater Report (Santa Barbara County, 2012), are appropriate for referencing the project site location with respect to the Uplands Basin boundaries and to related conservation district boundaries. The referenced county maps are available at the following web address:

http://www.countyofsb.org/uploadedFiles/pwd/Water/WaterAgency/Report%20Document%20FINAL.pdf

P328-171 Refer to **General Response 3.1.9** regarding the request for additional well production data for existing wells.

P328-172 The purpose of Figure 2-2 in Appendix C of the EA is to provide available information on historical well locations in the site vicinity to support the associated discussion in the text regarding the location of neighboring wells on page 2-8 of Appendix C of the EA. Figure 2-2 in Appendix C of the EA is centered on the wells located on the project site, as opposed to being centered on the project site boundary, because water level drawdown impacts typically decrease with increasing distance from a pumping well, not from a property line. The south property boundary happens to be farther from the on-site wells than the other property boundaries. Furthermore, as stated in the text in Appendix C of the EA (page 2-8), no wells were observed south of Armour Ranch Road (the south property boundary) during a site visit in March 2012.

P328-173 The peak hourly demand calculations for Alternative A were updated in the updated Water & Wastewater Feasibility Analysis Study included as Appendix C of the Final EA (refer to **General Response 3.1.9** for further discussion). The peak hourly demand for Alternative A is 284 gpm.

P328-174 Refer to **General Response 3.1.9** regarding the evaluation of impacts to nearby groundwater wells presented in the EA and water quality.

P328-175 Comment noted. Conservation measures are not included as mitigation measures in Section 5.2 of the EA for the reason cited by the commenter: the project water demands incorporate water conservation measures. Refer to **General Response 3.1.9** regarding the adequacy of mitigation measures presented in Section 5.2 of the EA to reduce impacts to groundwater resources, including off-site wells and water quality and revisions to the water supply demand presented in the Final EA.

P328-176 Refer to the response to **Comment L4-10** regarding the quality of groundwater that would serve the proposed development. Final testing for volatile organics and other priority pollutants would be required to be analyzed just prior to initiating the well for service. Community-level treatment of groundwater for potable use is not anticipated to be necessary to comply with applicable health regulations as the quality of the groundwater from a health standpoint appears to be adequate. If individual residents elect to use water softeners, the non-self-regenerating type of softeners (canister) would be required to limit the amount of salts discharged to the wastewater. Refer to the response to **Comment P207-06** regarding the quality of recycled water produced by the proposed WWTP.

P328-177 Comment noted. The commenter is correct that a small pump may not be the most energy efficient solution to accommodate low flow conditions for the upper pressure zone. An elevated gravity storage tank on a hillside would be the preferred solution. However, there is no suitable location for a tank site as a stand-alone elevated water storage tank would adversely impact visual resources. The Tribe will consider an updated water system storage layout that is more energy efficient should a better solution arise during detailed design.

P328-178 through **P328-183**

The Tribe is aware of the Santa Barbara County Flood Control requirements for treating storm water runoff for water quality. The Tribe is also familiar with the new Central Coast Regional Water Quality Control Board (CCRWQCB) Post-Construction Stormwater Requirements. If the Proposed Action were approved, the Santa Barbara County Flood Control and CCRWQCB requirements would not be applicable on the project site. However, the Tribe would incorporate, as appropriate, measures and BMPs from the Santa Barbara County Flood Control and CCRWQCB requirements, such as pervious materials for driveways, vegetated and/or swales for treating roadway runoff, and filters for catch basins. The EA is a planning level document, and specific post-construction treatments have not yet been determined. Refer to **General Response 3.1.9** for further discussion of off-site drainage.

P328-184 Comment noted. BIA guidelines state that in accordance with 602 DM 2, pre-acquisition environmental site assessment procedures shall adapt American Society of Testing and Materials (ASTM) Standards on Environmental Site Assessments for Commercial Real Estate (ASTM E-1527) in effect at the time (602 DM 2(d)). At the time of development of the Phase I Environmental Site Assessment (ESA), provided as Appendix H of the EA, the applicable ASTM standard was ASTM E-1527-05. On December 30, 2013, subsequent to the release of the EA, the USEPA adopted ASTM E1527-13.

Therefore, the Phase I ESA was conducted under an appropriate ASTM standard to assess hazardous materials conditions on the project site. In addition, as stated in Section 1.4.3 of the Phase I ESA provided as Appendix H of the EA, a reconnaissance inspection of the

subject property and adjacent was completed. No limitations due to size were noted in the Phase I ESA since the entire subject property was assessed during the reconnaissance inspections as all areas are accessible via four-wheel drive vehicle or within walking distance of vehicle accessible areas.

As stated in the ASTM Standard E2247-08 for the standard practice of environmental site assessments for forestland or rural property, the practice is intended for use on a voluntary basis. In addition, ASTM Standard E2247-08 states that it is essential to consider this standard with ASTM Standard E1527 titled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" as two alternative practices to conduct an all appropriate inquiry for forestland or rural property. ASTM states that both practices are intended to meet the requirements to conduct the all appropriate inquiry to assess recognized environmental conditions. Neither ASTM standard excludes the use of the other nor does ASTM provide a preference for use of one or the other to conduct assessments of rural property.

P328-185 User, as defined under the ASTM standard, is unique under a fee-to-trust acquisition since the Tribe is the owner of the property and user of the Phase I ESA in coordination with the BIA, which is also a user of the Phase I ESA to assist in the real estate aspects of accepting the project site into trust. Because the BIA does not have special knowledge of the project site since the site is owned in fee by the Tribe, the Tribe is identified as the owner and user and therefore one questionnaire was provided to the Tribe.

P328-186 Question number fourteen (#14) of the questionnaire submitted to the Tribe, the owner of the subject property, provided an appropriate inquiry of environmental liens or government notification related past or recurrent violations. Question number seventeen (#17) of the questionnaire inquires about existing or pending administrative proceeding concerning hazardous substances or petroleum produces on the subject property. Therefore this identification of a "data gap" in not warranted.

P328-187 Section 2 of the Phase I ESA identifies the structures on the subject property and Section 5 of the Phase I ESA provides information pertaining to the presence of these structures. No documentation of hazardous materials was identified in these structures.

P328-188 The materials in question, appropriately listed in Section 5 of the Phase I ESA (Findings and Conclusions), were noted in an area associated with active vineyard agriculture. The identification of the subject property as containing active vineyard agricultural is documented throughout the Phase I ESA and EA, in particular in Section 1.2 of the EA. The findings provided in Section 5 are as follows: "No spills or improper storage of chemicals were noted during the site reconnaissance."

P328-189 The findings provided in Section 5 of the Phase I ESA are as follows: "No spills or improper storage of chemicals were noted during the site reconnaissance." Standard applications of pesticides, which occur on vineyards throughout the region, are not anticipated to have been applied in amounts that would warrant additional study. In addition, as stated in Sections 2.2 and 2.3 of the Final EA, the majority of the vineyard on the project site would remain in operation under the Alternatives A and B. Standard procedures would be employed when removing the proposed 50 acres of the vineyard such that pesticide in localized soils, if present, would not be disturbed or transported off site. Development is not proposed for the 50 acres of previous vineyard, which reduces the risk of soil disturbance in the future.

P328-190 Comment noted. Discrepancies exist between the questionnaire and the text of the Phase I ESA; however, as noted in response to **Comment P328-188**, the above-ground tanks and chemical containers, appropriately documented in the Phase I ESA, did not show signs of spills or faulty containment. A new questionnaire will be completed by the Tribe's land manager to provide the most up-to-date information. Additionally, an update to the Phase I ESA will be conducted by the BIA prior to approval of the fee-to-trust acquisition. The information in the Phase I ESA included as Appendix H of the EA is adequate to assess potential hazardous materials impacts under NEPA.

Response to Comment Letter P329 – Klaus Brown

P329-01 Comment noted.

P329-02 Refer to **General Response 3.1.2** regarding the TCA. Potential impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.3** for a discussion of the adequacy of the analysis presented in the EA. Potential impacts to traffic are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts related to noise are addressed in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9 of the EA, and as discussed therein, no adverse impacts were identified. Potential impacts of the Proposed Action to visual resources are analyzed in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA, and adverse impacts would be reduced or avoided with implementation of the measures and BMPs outlined in Section 2.0 of the EA.

P329-03 Comment noted. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P329-04 Public notice regarding the EA was given in accordance the BIA NEPA Guidebook. Refer to **General Response 3.1.2** regarding the TCA. Potential impacts to environmental resources are identified and addressed throughout Section 4.0 of the EA, and adverse impacts would be

reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.10** regarding the inconsistencies of the proposed development with the SYVCP and County zoning. The purpose of the EA public comment period is to solicit comments from the public on the Proposed Action and project alternatives.

P329-05 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion. The federal laws that prohibit the development of a casino on the project site are not relevant to the Proposed Action and are therefore not discussed in the EA. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.5** regarding the purpose of the Proposed Action. Alternatives A and B have been updated to exclude development of an additional 50 acres of vineyard; refer to **General Response 3.1.9** for further discussion. Alternative B has been updated to eliminate the banquet/exhibition hall at the tribal facilities; refer to **General Response 3.1.17** for further discussion. Refer to the response to **Comment P314-02** regarding the economic self-sufficiency aspect of the Proposed Action.

P329-06 The Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. Loss of County tax revenue is addressed in Sections 4.1.6, 4.2.6, and 4.4.6 of the EA; as stated therein, implementation of Alternatives A and B would result in a de minims loss (0.01 percent) of the County's total property tax revenue.

P329-07 Transportation and circulation are addressed in Section 3.7 (baseline conditions) of the EA, and impacts associated with an increase in traffic generated by Alternatives A and B are addressed in Sections 4.1.7, 4.2.7, and 4.4.7 of the EA. A TIS was conducted to assess the existing conditions of the transportation network and assess associated impacts from Alternatives A and B. The TIS was included as Appendix I of the EA, and the results are incorporated into the above-mentioned sections of the EA. As discussed in Section 3.7.2 of the EA, the existing transportation network includes Baseline Avenue, Armour Ranch Road, SR-154, and SR-246. The trip generation rates used in the TIS for estimating traffic associated with construction and operation of Alternatives A and B were developed using the rates in the Institute of Transportation Engineers' trip generation report, 8th Edition (2008), and present realistic projections of increased traffic volumes. Refer to the response to **Comment S1-01** regarding upgrades to the SR-246/SR-154 intersection. As discussed in Section 3.7, LOS, which is a qualitative measure describing traffic conditions in terms of various factors including safety, was used to evaluate traffic impacts. With implementation of the mitigation measures included in Section 5.7, all intersections would operate at an acceptable LOS; hence minimal impacts to non-vehicular transit networks would occur.

Refer to the response to **Comment P329-05** regarding economic developments on the project site.

The Tribe removed the banquet/exhibition hall from Alternative B; refer to **General Response 3.1.17** for further discussion. Analysis of impacts related to the updated tribal facilities, including trips generated by operation of the facilities, and associated mitigation has been updated in Sections 4.2.7, 4.4.7, and 5.7 of the Final EA.

P329-08 Traffic associated with construction of Alternatives A and B is discussed in Sections 4.1.7 and 4.2.7 of the EA, respectively. As stated therein, construction trips generated would be less than the new trips anticipated during operation, would be temporary, and would be intermittent; hence, traffic impacts associated with construction would be minimal. Traffic associated with the tribal facilities is discussed in Section 4.2.7; as shown in Table 4-13, the facilities would add approximately 130 A.M. peak hour trips and 116 P.M. peak hour trips. Accordingly, trips generated by construction and operation of the tribal facilities are included in the analysis of impacts to LOS.

The Tribe removed the banquet/exhibition hall from Alternative B; refer to **General Response 3.1.17** for further discussion. Analysis of impacts related to the updated tribal facilities, including trips generated by operation of the facilities, and associated mitigation has been updated in Sections 4.2.7, 4.4.7, and 5.7 of the Final EA.

The EA is a planning level document. Grading design for Alternatives A and B is discussed in Chapter 2 of the Grading and Drainage Feasibility Analysis, included as Appendix D of the EA. The road layout and grading limits are depicted in Figures 2-1 and 2-2 of Appendix D of the EA, and the roadway grading is summarized in Tables 2-1 and 2-2 of Appendix D of the EA. It is unclear how the commenter came to the conclusion that Alternative B would require 10,000 cubic yards of excavation per acre. The commenter is incorrect in stating that Alternative B shows 194 acres for home site and roads. Alternative B includes 194 acres for home sites only; roads are not included in the 194 acres. As stated in Appendix D of the EA, there will be minimal grading to construct the building pads for Alternative B. Accordingly, there will not be 10,000 cubic yards of excavation per acre within the 194 acres referenced by the commenter. The development of the proposed roadways in Alternative B would require excavation of approximately 75,000 cubic yards, which is not excessive given the layout and design of the proposed roadways and the existing topography of the project site.

P329-09 The commenter is correct that implementation of Alternative A and B would result in an adverse impact to biological resources, as discussed in Sections 4.1.4 and 4.2.4 of the EA. However, as stated in Section 5.4 of the EA, these impacts would be reduced or avoided with implementation of the proposed mitigation measures. Refer to the response to **Comment P319-15** regarding the feasible avoidance of oak trees. The mitigation measures included in

Section 5.4.1 of the EA specify that a revegetation plan that includes proposed planting locations within the project site shall be prepared by a qualified arborist to ensure no net loss of oak trees. Additionally, the mitigation measure is similar to the County's Deciduous Oak Tree Protection and Regeneration Code (Chapter 35, Article IX), which also requires replacement plantings for removal of mature oak trees. The mitigation measures included in Section 5.4.2 of the EA require, at a minimum, creation of water of the U.S. at a 1:1 ratio for any affected waters of the U.S. and implementation of all mitigation in compliance with the provisions that would be included under a Section 404 Clean Water Act permit and Section 401 Water Quality Certification permit. Both proposed mitigation measures would restore the affected environment and/or provide replacement or substitute resources and are therefore consistent with the CEQ Regulations for Implementing NEPA (40 CFR 1508.20(3) and (5)).

Potential impacts to nesting migratory birds and other birds of prey are evaluated in Sections 4.1.4, 4.2.4, and 4.4.4. Contacting local bird watching groups is unnecessary as the mitigation measures included in Section 5.4.4 of the EA require pre-construction surveys be conducted by a qualified wildlife biologist within 14 days of construction. The mitigation measures require avoidance of impacts to bird species by specifying that tree removal can only occur outside of the nesting season and by requiring complete avoidance of trees containing nesting species until all birds have fledged and the nest is no longer occupied. These mitigation measures are therefore consistent with the CEQ Regulations for Implementing NEPA (40 CFR 1508.20(1)). If avoidance of impacts to bird species is infeasible, consultation with the USFWS will occur to establish the appropriate and acceptable course of action, which is consistent with the CEQ Regulations for Implementing NEPA (40 CFR 1508.20).

P329-10 A banquet/exhibition hall is no longer a component of the planned tribal facilities; refer to **General Response 3.1.17** regarding the revisions to the planned tribal facilities assessed within the Final EA.

P329-11 The commenter is correct that the statement "No adverse impacts to socioeconomic conditions or environmental justice would result from the implementation of either project alternative" is a conclusion. The conclusion is based on the evaluation of impacts presented in Sections 4.1.6, 4.2.6, and 4.4.6 of the EA. Refer to the response to **Comment P207-14** for discussion in support of the above-referenced conclusion. Elements of SYVCP relevant to the Proposed Action and project alternatives are described in Section 3.0 of the EA, and potential impacts of the Proposed Action and project alternatives related to the SYVCP are evaluated throughout Section 4.0 of the EA. The commenter did not indicate any specific insufficiencies or inaccuracies in regards to the analysis of the SYVCP; therefore, further review is not warranted.

P329-12 The statement, "A project that would induce "disorderly" growth (i.e., would conflict with local land use plans) could indirectly cause adverse environmental or public service impacts" referenced by the commenter on page 4-69 of the EA is accurate. In the paragraphs following this statement of page 4-69 of the EA, it is stated that "Analyses of the adequacy of local infrastructure and services are included in the discussion of environmental consequences for each proposed alternative. No significant, unmitigated impacts have been identified that would result from the implementation of Alternative A or Alternative B." In addition, text was added to Section 4.5.2 of the Final EA to clarify that orderly development and growth on the project site would occur consistent with the stated purpose and need of the Tribe, if the Proposed Action is approved. Regarding the development proposed for the project site, refer to the response to **Comment P158-02**.

P329-13 As discussed in Section 1.3 of the EA, much of the usable portion of the existing Reservation has already been developed; refer to the response to **Comment P289-07** for further discussion. The purpose of the Proposed Action is to alleviate the tribal housing shortage as well as protect the Tribe's heritage and culture; refer to the response to **Comment P328-22** for further discussion. Refer to **General Response 3.1.13** as to why other locations for the proposed development are not reasonable alternatives.

P329-14 The Tribe has revised Alternatives A and B to reduce the vineyard acreage (both alternatives) and exclude the banquet/exhibition hall (Alternative B); refer to **General Responses 3.1.9** and **3.1.17**, respectively, for further discussion. Refer to the response to **Comment P314-02** regarding the economic self-sufficiency aspect of the Proposed Action. Appendix N of the EA contains concept plans for the project site. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Refer to **General Response 3.1.3** regarding the adequacy and completeness of the EA.

P329-15 The criteria used to define significant and/or adverse impacts to resources are listed in Section 4.0 of the EA. For example, the criteria to determine if an adverse impact to cultural resources would occur is in Section 4.1.5 of the EA, and the criteria to determine if an adverse impact to the areas of socioeconomic and environmental justice would occur are listed in Section 4.1.6 of the EA.

P329-16 Refer to the response to **Comment P207-06** regarding regulation of the proposed WWTP. Refer to **General Response 3.1.9** regarding the adequacy of the analysis and appropriateness of the mitigation measures to reduce impacts to water supply and groundwater. As stated in the Water and Wastewater Feasibility Study, included as Appendix C of the Final EA and updated per the changes to the proposed tribal facility (refer to **General Response 3.1.17**) and proposed vineyard acreage (refer to **General Response 3.1.9**), the wastewater flows were calculated based on:

- 90 percent of domestic water demand generates wastewater flow
- Permanent population of 500 (3.5)
- 40 employees at the tribal facility
- 100 tribal events with up to 400 people per event

Accordingly, the calculation is consistent with the stated purpose of the proposed development and the analysis presented in Appendix I of the Final EA.

P329-17 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA. Refer to **General Response 3.1.2** regarding the range of alternatives considered within the EA.

P329-18 Refer to **General Response 3.1.2** regarding the TCA.

P329-19 Consultation with appropriate agencies, organizations, and individuals during preparation of the EA occurred pursuant to the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. Refer to **General Response 3.1.3** regarding the adequacy of the EA.

P329-20 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P330 – Peter Van Iderstine

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

Response to Comment Letter P331 – Steve Wood

P331-01 Comment noted. Refer to the response to **Comment L4-03** regarding the laws that govern trust acquisition. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition as contrasted with the County land use approval process.

Response to Comment Letter P332 – Stand Up for California Director Cheryl Schmit

P332-01 and **P333-02**

Comments noted.

P332-03 The commenter refers to the fee-to-trust application and not the EA; no response is warranted.

P332-04 The comment is primarily concerning the fee-to-trust application. Refer to **General Response 3.1.2** regarding the revision of the EA given the withdrawal of the TCA.

P332-05 Refer to the response to **Comment P329-05** regarding economic developments on the project site.

P332-06 The commenter refers to the fee-to-trust application and not the EA; no response is warranted.

P332-07 Refer to **General Response 3.1.2** regarding the revision of the EA and consideration of an off-reservation trust acquisition request given the withdrawal of the TCA. Refer to **General Response 3.1.3** for a discussion related to the requirements for an EIS.

P332-08 The tribal facilities have been updated to exclude the banquet/exhibition center; refer to **General Response 3.1.17** for further discussion. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P332-09 through **P332-11**

Refer to the response to **Comment L4-03** regarding the U.S. Department of the Interior's recognition of the Tribe. Refer to **General Response 3.1.2** regarding the TCA.

P332-12 The commenter refers to the fee-to-trust application and not the EA; no response is warranted.

P332-13 Potential impacts to environmental resources are evaluated throughout Section 4.0 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures included in Section 5.0 of the EA. Refer to **General Response 3.1.11** regarding lost tax revenue and support of public services.

P332-14 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process.

P332-15 Refer to **General Response 3.1.5** for a discussion of the need of the proposed development.

P332-16 The Tribe has revised Alternatives A and B to reduce the vineyard acreage (both alternatives) and exclude the banquet/exhibition hall (Alternative B); refer to **General Responses 3.1.9** and **3.1.17**, respectively, for further discussion.

It is unclear why the commenter believes a statement that development on the project site would be subject to applicable federal laws is indicative of unanswered questions in the EA. If the project site is taken into trust, federal regulations such as the Clean Water Act and Clean Air Act would be applicable on trust land. Section 1.6 of the EA clearly identifies regulatory requirements and approval that would be applicable to the Proposed Action and

proposed development. For example, consultation with the USACE under Section 404 of the Clean Water Act would be required if waters of the U.S. are impacted.

The Tribe's development plans for the project site are included in Appendix N of the EA. Development of a major hotel, shopping mall chain, gas station, or other similar commercial development is not included in the concept plans presented in Appendix N of the EA. As stated in Section 2.0 of the EA, the primary purpose of the proposed development is to provide housing for existing tribal members and descendants as they come of age. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion. Potential impacts to waters of the U.S., including wetlands, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA. As discussed therein, Alternatives A and B have the potential to impact 0.15 and 0.01 acre of wetlands, respectively; however, mitigation measures presented in Section 5.4 of the Final EA require no construction nor development occur within wetlands; refer to **General Response 3.1.7** for further discussion. Refer to **General Response 3.1.5** for further discussion as to the purpose and need of the Proposed Action.

P332-17 The commenter refers to the fee-to-trust application and not the EA; no response is warranted.

P332-18 Refer to **General Response 3.1.5** for a discussion as to the need of the Proposed Action. Potential impacts to land use are evaluated in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA; as discussed therein, no adverse impacts would result from implementation of the Proposed Action. Potential impacts to socioeconomic conditions/environmental justice, including loss of property taxes, are addressed in Sections 4.1.6, 4.2.6, and 4.4.6 of the EA; as discussed therein, no adverse impacts would occur.

P332-19 The Tribe would provide financial support for public services, such as law enforcement and fire protection, provided by the County on the project site if the trust acquisition were approved; refer to **General Response 3.1.11** for further discussion. Refer to the response to **Comment P316-03** regarding loss of property taxes to the County. For responses to the County Comment Letter, refer to the responses to **Comment Letter L3**. Potential impacts to public services, including schools, are addressed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as discussed therein, no adverse impacts to public schools would occur; refer to the response to **Comment L3-12** and **General Response 3.1.11** for further discussion.

P332-20 Refer to **General Response 3.1.10** regarding the inconsistency of the proposed development compared to the surrounding land uses. Refer to **General Response 3.1.11** regarding the existing service agreements between the Tribe and County. As discussed in Section 4.1.6 of the EA, the Tribe has offered a comprehensive agreement to the County which includes payments in lieu of taxes; however, the County has not acted upon the offer. Refer to

General Response 3.1.4 regarding the environmental impacts of the existing Chumash Casino Resort.

P332-21 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P332-22 As discussed in Section 4.1.9 of the EA, the SBCSD would provide law enforcement services to the project site. The Tribe is not proposing to employ federal law enforcement officers if the project site is taken into trust as California is a Public Law 280 State. Refer to **General Response 3.1.11** regarding the existing service agreements between the Tribe and County, including the SBCSD.

P332-23 and **P332-24**

Refer to **General Response 3.1.10** regarding ROWs on the project site.

P332-25 The commenter refers to the fee-to-trust application and not the EA; no response is warranted.

P332-26 Refer to the response to **Comment P328-189** regarding pesticide use at the vineyard on the project site. A detailed report of surface and subsurface soil is not warranted.

Response to Comment Letter P333 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P327. Refer to **Response to Comment Letter P327**.

Response to Comment Letter P334 – Stand Up for California Director Cheryl Schmit

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P332. Refer to **Response to Comment Letter P332**.

Response to Comment Letter P335 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter explicitly states the comments are regarding the fee-to-trust application associated with the EA.

Response to Comment Letter P336 – Susan F. Petrovichm, Attorney for Charles Grimm

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is correspondence regarding submission of a comment letter.

Response to Comment Letter P337 – Lyn Moore

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is correspondence confirming receipt of other comment letters.

Response to Comment Letter P338 – David Bonifaci

P338-01 Comment noted. Refer to **General Response 3.1.11** regarding the loss of tax revenue if the trust acquisition is approved.

Response to Comment Letters 339 through P507

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P338. Refer to **Response to Comment Letter P338**.

Response to Comment Letter 508 – Tomas Alvarrog

P508-01 Comment noted. Existing cultural resources, including a discussion of the historical significance of the project site to the Tribe, are discussed in Section 3.5 of the EA.

Response to Comment Letters 509 through P673

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P508. Refer to **Response to Comment Letter P508**.

Response to Comment Letter P674 – Amber Ventura

P674-01 Comment noted. Refer to **General Response 3.1.5** for further discussion of the purpose of the trust acquisition.

Response to Comment Letters 675 through P828

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P674. Refer to **Response to Comment Letter P674**.

Response to Comment Letter P829 – Jefferey N. Baugher

P829-01 Comment noted. Refer to **General Response 3.1.5** for further discussion regarding the need for housing.

Response to Comment Letters P830 through P983

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P674. Refer to **Response to Comment Letter P829**.

Response to Comment Letter P984 – Caryn and Tom Cantella

P984-01 and **P984-02**

Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P984-03 Refer to **General Response 3.1.10** regarding the inconsistencies of Alternatives A and B with the SYVCP. It is assumed the commenter is referring to the TCA when mentioning "the plan"; refer to **General Response 3.1.2** regarding the TCA.

P984-04 Refer to **General Response 3.1.2** regarding the TCA.

P984-05 Refer to the response to **Comment L3-39** regarding the adequacy of the traffic analysis of County roadways included in the EA.

P984-06 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P985 and P986

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P280. Refer to **Response to Comment Letter P280**.

Response to Comment Letter P987 – Kathleen S. Day

P987-01 and **P987-02**

It is assumed the commenter is referring to the TCA when mentioning "the plan"; refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P988 – Kenneth P. Day

P988-01 through **P988-03**

It is assumed the commenter is referring to the TCA when mentioning "the plan"; refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P989 – Kenneth P. Day

P989-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P989-02 Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

P989-03 Refer to **General Response 3.1.14** regarding impacts to visual resources.

P989-04 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P989-05 Refer to **General Response 3.1.4** regarding the environmental impacts of the existing Chumash Casino Resort.

Response to Comment Letter P990 – William J. Otto

P990-01 Comment noted.

P990-02 The potential impacts of the Proposed Action to environmental resources are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA.

P990-03 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process.

P990-04 Potential impacts to traffic and transportation are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Potential impacts to visual resources, including light and glare, are evaluated in Sections 4.1.12, 4.2.12, 4.3.12, and 4.4.12 of the EA; adverse impacts to visual resources would be reduced or avoided with implementation of the protective measures and BMPs identified in Section 2.2.10 of the EA. Potential impacts to biological resources, including oak trees and wetlands, are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and mitigation measures are presented in Section 5.4 of the EA that would reduce identified impacts to a minimal level. Potential impacts to water, including water supply, are addressed in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.2 of the EA.

P990-05 The Tribe is considering nine concept plans for development on the project site; these are included as Appendix N to the EA. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Refer to the response to **Comment P303-03** regarding the WWTP. Refer to **General Response 3.1.17** regarding the revisions to the planned tribal facilities assessed within the Final EA. The potential impacts of the Proposed Action to environmental resources are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion. Refer to **General Response 3.1.9** regarding impacts to groundwater resources, including impacts to neighboring wells. Regarding the comment that land use rules are in place for a reason; comment noted.

P990-06 Refer to **General Response 3.1.3** regarding the adequacy and accuracy of the EA.

P990-07 Comment noted. Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process.

Response to Comment Letter P991 – John D. Wrench

P991-01 Comment noted.

P991-02 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process compared to the County land use approval process. Refer to the response to **Comment P328-22** regarding the preference for on-reservation housing compared to off-reservation housing.

P991-03 Potential impacts of Alternative B to water resources are addressed in Sections 4.2.2, 4.2.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts of Alternative B to air resources are addressed in Sections 4.2.3 and 4.4.3 of the EA; no adverse impacts to air resources would occur with implementation of the project alternatives, and additional protective measures are included in Section 5.3 of the EA to further reduce impacts. Potential impacts of Alternative B to traffic are addressed in Sections 4.2.7 and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA. Refer to **General Response 3.1.17** regarding impacts associated with the tribal facilities and the revisions to the planned tribal facilities assessed within the Final EA.

The analysis of impacts to socioeconomic conditions and environmental justice presented in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA was prepared in accordance with the BIA NEPA Guidebook and appropriately considers impacts to minority populations, low income

populations, and Indian tribes. Impacts to people residing in the local region not within one of the three aforementioned categories are evaluated throughout Section 4.0 of the EA by considering impacts to resources utilized by those residents. For example, the analysis presented in Section 4.1.2 of the EA considers the impacts to neighboring groundwater wells.

P991-04 Comment noted. Refer to **General Response 3.1.9** for a discussion regarding the analysis of impacts to groundwater resources.

P991-05 Comment noted. The proposed WWTP would be designed to recycle the maximum amount of wastewater possible. Excess recycled water not used for irrigation would be stored in the existing water reservoir, which would be repurposed for tertiary-treated effluent storage and enlarged as necessary, as stated in Section 2.2.6 of the EA.

P991-06 Comment noted. Refer to **General Response 3.1.16** regarding the Tribal Oak Ordinance.

P991-07 The commenter is incorrect as the purpose of Section 3.0 of the EA is to present relevant information concerning existing resources to establish the baseline for determining environmental effects in Section 4.0 of the EA. The commenter is correct that the EA identifies impacts to resources throughout Section 4.0 of the EA, and if the identified impact would be adverse, mitigation measures are provided in Section 5.0 of the EA to reduce or avoid the impact. As stated in Section 2.5 of the EA, the No-Action Alternative (Alternative C) would result in less substantial environmental effects compared to those identified for Alternatives A or B; however, this alternative would not meet the Tribe's objectives of providing a sufficient number of housing units for tribal families. Developing the project site under the County land use approval process would not allow for tribal governance over tribal residences or the existing tribal economic activities on the project site; refer to **General Response 3.1.5** for further discussion. Similarly, purchasing housing units in various locations across the region would not allow for the Tribe to enhance and protect its heritage and culture by ensuring existing and future generations are afforded the ability to live under tribal governance as a community; refer to the response to **Comment P328-22** for further discussion.

P991-08 Refer to **General Response 3.1.10** regarding the inconsistencies of Alternatives A and B with the Santa Barbara County Comprehensive Plan and SYVCP. The potential impacts of the Proposed Action related to agriculture are analyzed in Sections 4.1.8, 4.2.8, 4.3.8, and 4.4.8 of the EA, and no adverse impacts were identified; refer to the response to **Comment L3-18** for further discussion, including regarding the Williamson Act contracts on the project site. Refer to the response to **Comment L3-09** regarding the inconsistencies of Alternatives A and B with the County Codes, including the agricultural buffer ordinance. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P991-09 Refer to the response to **Comment P262-14** regarding the analysis of traffic in the cumulative scenario.

P991-10 Refer to **General Response 3.1.3** regarding the adequacy of the mitigation measures presented in Section 5.0 of the EA.

P991-11 Comment noted. Refer to **General Response 3.1.9** for a discussion regarding the analysis of impacts to water supply. Refer to the responses to **Comments P991-04** and **P991-05** regarding concerns about the WWTP. Refer to **General Response 3.1.10** regarding the inconsistencies of Alternatives A and B with the Santa Barbara County Comprehensive Plan and SYVCP.

P991-12 Comment noted.

Response to Comment Letter P992 – Elizabeth Gill

P992-01 The potential impacts of the Proposed Action to environmental resources are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Potential impacts to traffic and transportation are addressed in Sections 4.1.7, 4.2.7, 4.3.7, and 4.4.7 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.7 of the EA.

P992-02 Refer to the response to **Comment L3-39** regarding the traffic analysis included in the EA.

P992-03 Refer to **General Response 3.1.9** regarding the water supply and demand analysis included in the EA.

P992-04 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P993 – Barry Cappello (Attorney for Nancy Crawford-Hall)

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter is a near duplicate of Comment Letter P311. Refer to **Response to Comment Letter P311**.

Response to Comment Letter P994 – John and Cynthia Sanger

P994-01 Comment noted.

P994-02 Refer to **General Response 3.1.2** regarding the TCA.

P994-03 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P994-04 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site.

P994-05 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P994-06 Refer to **General Response 3.1.9** regarding impacts to groundwater resources.

P994-07 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.10** regarding the inconsistencies with the existing local land use plans in the EA.

P994-08 Refer to **General Response 3.1.2** regarding the TCA.

P994-09 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions. Refer to **General Response 3.1.2** regarding the TCA.

Response to Comment Letter P995 – Mimi Watson

P995-01 Comment noted. Refer to **General Response 3.1.2** regarding the TCA

P995-02 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P995-03 The potential impacts of the Proposed Action to environmental resources are evaluated throughout Section 4.0 of the EA. Adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. Potential impacts to water; including water rights, water use, and water quality; are addressed in Sections 4.1.2, 4.1.4, 4.2.2, 4.2.4, 4.3.2, 4.3.4, 4.4.2, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Sections 5.2 and 5.4 of the EA. Potential impacts to biological resources are addressed in Sections 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA, and adverse impacts would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. Refer to **General Response 3.1.2** regarding the TCA. Refer to **General Response 3.1.11** regarding removal of the project site from the County tax base and impacts to public services and utilities.

Response to Comment Letter P996 – Santa Barbara Audubon Society Co-President Stephen J. Ferry

P996-01 Comment noted.

P996-02 The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook to examine potential environmental impacts associated with the trust acquisition and proposed development by the Tribe. Under these guidelines, a discussion of federally-listed species is sufficient for an EA and to meet BIA requirements under the ESA. As stated in Section 3.4 of the EA, the lists of regionally occurring special-status species consulted to develop the analysis presented in the EA include:

- USFWS letter of listed and candidate species that may occur in the vicinity of the project site, Santa Barbara County, California (USFWS, 2011);
- California Native Plant Society (CNPS) list, dated March 19, 2012, of reported occurrences of special-status plants within the Santa Ynez and Los Olivos U.S. Geographical Survey (USGS) 7.5-minute topographic quadrangles (quads); and
- California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) list, dated March 2, 2012, of reported occurrences of special-status species within the Santa Ynez and Los Olivos quads (CDFW, 2003).

Section 3.4.1 of the EA describes federally-listed species and discusses their habitat needs. No federally-listed bird species were identified by USFWS to have the potential to occur on the project site. Furthermore, no migratory birds or other birds of prey, including eagles, were observed nesting during field surveys. Refer to **General Response 3.1.7** for further discussion regarding the methods used to assess the potential of listed species to occur on the project site.

As stated in Section 5.4.4 of the EA, nesting bird surveys, which would include raptors such as eagles, would be performed within 14 days prior to commencement of construction activities. All identified active nests would be protected as required under the Migratory Bird Treaty Act.

Response to Comment Letter P997 – Fred Kovol

P997-01 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

P997-02 Comment noted. While the Uplands Basin is defined in the Department of Water Resources (DWR) Bulletin 118, no voluntary groundwater management plan in accordance with AB 3030 has been developed. Refer to **General Response 3.1.9** for further discussion regarding groundwater impacts.

P997-03 and **P997-04**

As stated in Section 3.9.1 of the EA, water in the general vicinity of the project site is supplied by service connections to the ID1. However, the project site is outside the ID1 service area, and there are no existing plans for expansion of the service area.

P997-05 through **P997-07**

Refer to **General Response 3.1.9** regarding the status of the Uplands Basin, groundwater monitoring data presented in the EA, and the quality of the groundwater.

Response to Comment Letter P998 – Santa Ynez Valley Alliance President Mark Oliver

P998-01 Comment noted.

P998-02 Given the withdrawal of the TCA, the Proposed Action constitutes an off-reservation trust acquisition request pursuant to 25 CFR 151.3(a)(3); text was updated in Section 1.0 of the Final EA to remove the reference to 25 CFR 151.3(a)(1). Refer to **General Response 3.1.2** for further discussion.

P998-03 Refer to **General Response 3.1.13** regarding the concept plan chosen for full evaluation in the EA as Alternative B.

P998-04 Roadways are located adjacent to the northern, southern, and a portion of the western boundaries of the project site. Currently, developed land uses in the vicinity of the project site include residential development to the north and east. Agricultural crops are located to the west. Non-native annual grassland can be found to the southeast, south, and southwest of the project site. As described in Section 3.4 of the EA, the existing corridor serves as the primary mechanism for linking the project site to other habitats located to the north and southwest of the project site. Because it is bounded on a majority of sides by non-habitat land uses, the property does not serve to link any other significant natural habitat regions to one another; therefore, no additional wildlife corridors were identified in the EA.

The ephemeral drainage identified as a wildlife corridor in Section 3.4 of the EA currently supports limited habitat resources such as shrubby upland vegetation. Alternatives A and B are designed to avoid the identified wildlife corridor, thereby allowing its continued usage for migration. Buffers would restrict construction activities so that no equipment storage, grading, or structural development would occur within the identified corridor.

P998-05 Refer to **General Response 3.1.7** regarding the adequacy of the analysis of impacts to biological resources presented in the EA. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P998-06 Refer to **General Response 3.1.10** regarding the inconsistencies with the existing local planning and land use plans.

P998-07 Refer to the responses to **Comments L3-14** and **L3-18** regarding the analysis of impacts to agricultural resources presented in the EA.

P998-08 The cumulative analysis presented in Section 4.4 of the EA accurately and adequately analyzes potential impacts to resources; with implementation of the mitigation measures identified in Section 5.0 of the EA, adverse impacts in the cumulative scenario would be reduced or avoided. Refer to **General Response 3.1.3** regarding the TCA.

P998-09 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P998-10 Comment noted.

P998-11 Refer to the response to **Comment P996-02** regarding the criteria and sources used to assess special-status species that have the potential to occur on the project site. The site has the potential to support the federally threatened California red legged frog (CRLF) and the VPFS.

The "list 1B" designation is assigned to plants by the CNPS and by the CDFW via CNDDB listings; it is not assigned by a federal agency. As stated in Section 3.4 of the EA, no federally-listed plants were identified that have the potential to occur on the project site.

Refer to **General Response 3.1.7** for additional discussion regarding special-status species.

P998-12 Special-status species searches occurred per the parameters described in the response to **Comment P996-02**. As stated in Section 3.4 of the EA, no federally-listed plants were identified that have the potential to occur on the project site.

A CNPS list was reviewed during preparation of the EA. The attached list of plants and designation of their potential to occur as prepared by the commenter is noted. Appendix E of the EA lists those species confirmed to be present on the project site by a qualified botanist and provides copies of documented research. However, only federally-listed species are addressed in Sections 3.4, 4.1.4, 4.2.4, 4.3.4, and 4.4.4 of the EA as is required by NEPA and the ESA. No additional survey is necessary to provide the level of discussion required under the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook.

Although a dry trend in rainfall has been continuous for several years, survey coverage over multiple years minimizes the likelihood of overlooking early or late bloom occurrences. Surveys were conducted on the project site on September 12 through 14, 2011, March 7 through 9, 2012, April 23 through 25, 2012, and July 16 and 17, 2013. Refer to **General**

Response 3.1.7 for further discussion as to the adequacy of the analysis of impacts to biological resources presented in the EA.

P998-13 *Stipa pulchra* is the basionym (or original name) for *Nassella pulchra*, which is commonly referred to as purple needlegrass. This species was included on the list of plants and wildlife observed on the project site, which was submitted as part of Appendix E of the EA. Although documented to occur on the project site, purple needlegrass is not considered to be abundant enough to constitute designation as a separate habitat type. Dominant grassland vegetation was observed to be soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), Bermuda grass (*Cynodon dactylon*), barnyard grass (*Echinochloa crus-gali*), wild oat (*Avena fatua*), and English plantain (*Plantago lanceoleta*), among others. Despite being present on the project site, purple needlegrass was not observed as a dominant vegetative species. Therefore, listing the grassland present on the project site as non-native, brome-based is accurate.

P998-14 The intensity of the survey is directly correlated with the intensity of desired survey coverage relative to the quality of data collected, habitat accessibility, and the ecology of the subject species. Specialized surveys are most commonly performed to assess a particular species when that species has the potential to occur on the project site based on a review of documented records and preliminary site surveys. The EA considers those species which are of federal concern pursuant to the ESA. Of the federally-listed species, only VPFS and CRLF are identified to have the potential to occur on the project site. A thorough general survey was performed for the entire site and included inspection for signs of wildlife, such as scat/guano, dens/burrows, beds, and tracks. No federally-listed wildlife was observed during multiple surveys, including surveys performed in fall and summer (September 2011 and July 2013, respectively). Surveys were also conducted in March and April 2012, and no federally-listed species were observed during these surveys.

P998-15 The Tribal Oak Tree Ordinance serves to protect trees similar to ordinances developed for non-tribal lands (e.g. the County's Deciduous Oak Tree Protection and Regeneration Code). Refer to **General Response 3.1.16** for further discussion.

P998-16 The oak savanna habitat type, as indicated in Figure 3-4 of Section 3.4 of the EA, was identified and mapped using a series of tools beginning with hand-held aerial maps. The perimeters of habitat areas were confirmed by an on-ground assessment during site surveys and then incorporated into a digital format based on guided interpretation of those field notes by a graphics expert. Refer to **General Response 3.1.7** for further discussion of the technology used to generate site maps.

Identification of habitat through a ground-truth assessment allows a comparison of overall features of the habitat including ecological relationships with other species of plants or trees.

In general, oak savanna is defined by an area that is dominated by oak trees acting as a "keystone species" (ecologically defined, this term refers to a species which is integral in establishing a habitat type). Habitats dominated by oak trees exhibit a density of oaks which is higher than surrounding grassland, may support micro-habitats as a result of shade or a different subset of resident species, and may experience different fluctuations in surface water availability relative to surrounding grassland. Figure 3-4 of Section 3.4 of the EA depicts the project site survey results as reported by qualified biologists and botanists and is ultimately a function of the best determination of a boundary in a system which experiences natural gradations in character.

The term Resource Management Zone (RMZ) was developed by the Tribe to refer to areas within which the Tribe would protect, preserve, and/or enhance the native habitat. As stated in Section 2.2 of the EA, approximately 98 acres of riparian corridors and approximately 33 acres of oak woodland would be protected from development and, where necessary, enhanced in accordance with tribal ordinances under Alternatives A and B. These RMZs were designated based on various factors, such as type and quality of the existing habitat, the purpose and needs of the project, and the Tribe's commitment to conservation.

P998-17 Both Alternative A and Alternative B outline an Oak Woodland RMZ. As planned, the Oak Woodland RMZ will protect approximately 33 acres of oak woodland from development, as shown in Figures 2-2 and 2-3 of Section 2.0 of the EA. To protect oak trees, ground disturbance in these areas would be limited within the dripline of any oak tree in this zone and hand tools would be used whenever feasible to minimize ground disturbance.

Figure 3-4 of Section 3.4 of the EA, which presents the habitat types on the project site, depicts four small areas identified as oak savanna habitat. Almost all of these patches of oak savanna habitat were identified as the Oak Woodland RMZs included in Alternatives A and B. The larger patch in the eastern-central portion of the project site is split into two smaller Oak Woodland RMZs and is joined by an area designated as open space/recreation zone. Additionally, the Oak Woodland RMZ located in the central portion of the project site is connected to the project site boundary in both Alternatives A and B via an area of open space to the west to allow wildlife to enter or exit the area. It is likely that raptors would still access the Oak Woodland RMZs to hunt rodents, as a wildlife corridor exists and much of the oak habitat will remain.

As part of the oak tree mitigation program (refer to Section 5.4 of the EA), much of the oak replacement would focus on the riparian corridor and surrounding microhabitats. This process would encourage the recruitment of new trees and would include monitoring to ensure survival, thereby encouraging the establishment of younger trees. The oak tree mitigation program would outline provisions that aim to improve the quality of and propagate the habitat available, consistent with the goals of the Oak Woodland RMZs and the Tribe.

P998-18 Comment noted. Refer to **General Response 3.1.16** regarding the adequacy of the mitigation measures proposed to reduce impacts to oak trees.

P998-19 Comment and recommended program features noted. Refer to **General Response 3.1.16** regarding the long term biologically-based oak savanna restoration and preservation program in association with the Tribal Oak Tree Ordinance. If the trust acquisition is approved, the Tribe would choose an arborist with acceptable qualifications to fit the Tribe's objectives. It is within the Tribe's discretion to select an arborist with experience working with biological resources. Implementation of the Oak Tree RMZs, as discussed in the response to **Comment P998-17**, will act to preserve representative types of oak savanna habitat.

P998-20 Comment noted. The drainages mentioned by the commenter were accurately depicted on Figure 3-4 of Section 3.4 of the EA. Drainage patterns were surveyed, mapped, and incorporated in the Grading and Drainage Feasibility Analysis conducted by a licensed engineer and included as Appendix D of the EA. The results of the drainage survey were accurately depicted in Section 3.2 of the EA.

P998-21 A drainage channel exhibits defined bed, bank, and channel and may also be characterized by a change in riparian vegetation relative to surrounding upland habitat, as well as fluctuations in substrate morphology, cumulatively indicative of a consistent or occasional hydromorphic regime in the channel. An ephemeral drainage is one which, by definition, may be only seasonally wetted, typically from a surface water source as opposed to groundwater. A swale does not exhibit channel characteristics as described above and is not defined to be a jurisdictional water of the U.S. under the Clean Water Act. Ecogeomorphological features evident in a dry stream including bankfull width, channel profile, cover (and allochanthous associations), gradient, and associated features of channel diversification such as woody debris and boulders, are acceptable methods to characterize a stream even when dry. The March and April surveys of the project site in 2012 were conducted within a suitable survey window.

Vernal pools are considered a type of seasonal wetland in the analysis presented in the EA; text was added to Section 3.4 of the Final EA for clarification. Refer to **General Response 3.1.7** regarding the adequacy of the analysis of impacts to VPFS.

P998-22 Section 3.4.1 of the EA describes the on-site ephemeral drainages as being highly scoured with a cobble substrate. Scour would quickly overturn most if not all incubating eggs. Although VPFS can be found in a variety of standing water features, the hydrodynamic diversity of a highly scoured stream does not constitute suitable habitat. This species lives predominantly in pools which are mud or grassy bottomed, usually have no flow, and which provide benthos suitable for egg-laying. Vegetation observed in association with ephemeral channels on the project site consisted of coarse weedy varieties, distinctly different from the

grassy species commonly found in suitable VPFS habitat. Although this species has been known to occur in isolated pools and other natural and man-made features within ephemeral drainages, the identified features of the ephemeral drainages present on the project site indicate that even when wetted, these features do not contain suitable habitat to support VPFS.

The Final EA has been updated to clarify that no development would occur within the vernal pool (seasonal wetlands and seasonal swale) habitat areas of the project site under Alternatives A and B; refer to **General Response 3.1.7** for further discussion. As described in Section 7.2 of the BA (included as Appendix E of the EA) and Section 5.4.3 of the Final EA, prior to the final siting of the residential units, utility corridors, roadways, and any other project components that would result in ground disturbance, a qualified biologist shall identify appropriate wetland habitat buffer zones around seasonal wetland habitat within the project site to assure avoidance during construction. Should construction activities be anticipated to occur within 500 feet of the seasonal wetlands, a qualified biologist must be present to demarcate the buffer zone and to provide training prior to commencement of said activity; text was updated in Section 5.2 of the Final EA to clarify this. Construction activities and staging shall not occur within identified wetlands or wetland buffer zones. The BIA has requested informal consultation with the USFWS to concur that the above-mentioned mitigation would reduce impacts to VPFS to minimal levels. A copy of the informal consultation request is included as Appendix R of the Final EA. Avoidance measures are acceptable mitigation according to the definition of "mitigation" presented in Section 1508.20 of the CEQ Regulations for the Implementation of NEPA (40 CFR Parts 1500 -1508). Furthermore, as discussed in Section 3.4 of the EA, the total area of potentially impacted VPFS habitat on the approximately 1,400 acre parcel within the designated critical habitat is 0.15 acre for Alternative A and 0.01 acre for Alternative B. The acreages present on the project site do not constitute a significant area of core critical habitat area; regardless, mitigation was incorporated into the project to avoid impacts to these habitats. With the implementation of the mitigation listed in Section 5.4 of the Final EA, all seasonal wetlands and wetland swales would be avoided and no development would occur within appropriate buffer zones as established by a qualified biologists.

P998-23 Comment noted. A qualified biologist shall monitor construction activities during initial grading activities within the project site. Should one or more CRLF be detected within the construction footprint, grading activities shall halt and the USFWS shall be consulted. No grading activities shall commence until the biologist determines that the CRLF has vacated the construction footprint on its own accord and the USFWS authorizes the re-initiation of grading activities. Once the project is developed, regulation of protected species would fall under the jurisdiction of the Tribe with oversight from the USFWS. Once construction is completed, residential disturbance of habitat is not covered under the ESA.

P998-24 Comment noted. Mitigation measures required to offset impacts to nesting birds are discussed in Section 5.4.4 of the EA. Actions include preconstruction nesting surveys, removal of any unavoidable trees only outside of the nesting season (generally March 1 to September 15 of each year for the project area), and avoidance. Because nesting sites are highly variable on a year-to-year basis, presence or absence of nests and verification of activity therein can only be confirmed during the pre-construction survey immediately prior to commencement of construction activities. Should sensitive nests be identified within the project site at that time, appropriate measures would be implemented following consultation with USFWS. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook to examine potential environmental impacts associated with the trust acquisition and proposed development by the Tribe. Under these guidelines and in accordance with BIA's requirements under the ESA, a discussion of federally-protected nesting migratory birds and raptors is sufficient for an EA. No federally-listed bird species were identified to potentially occur on the project site through the methodologies discussed in the response to **Comment P998-10**. For a discussion of the effects of fragmentation on bird species, refer to the response to **Comment P998-16**.

P998-25 No federally-listed bats were determined to have the potential to occur on the project site. The EA was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook to examine potential environmental impacts associated with the trust acquisition and proposed development by the Tribe. Under these guidelines, and in accordance with BIA's requirements under the ESA, a discussion of federally-listed bat species is sufficient for the EA. The general wildlife survey conducted for the project site did not identify any signs of bats present on the project site, such as guano. Refer to the response to **Comment P998-16** for a discussion of fragmentation of habitats.

P998-26 As stated in Section 3.4 of the EA, migratory birds and other birds of prey, protected under 50 CFR 10 of the Migratory Bird Treaty Act, have the potential to nest within the trees within the nonnative annual grassland, oak savanna, vineyard, and ruderal/developed areas. A nesting bird survey would be performed within 14 days prior to commencement of construction activities to verify presence or absence of any active nests. While raptors and migratory birds were observed on-site during the survey, no migratory birds or other birds of prey were observed nesting during the 2011, 2012, and 2013 biological surveys of the project site.

Comment noted.

P998-27 The impacts of Alternative B, including the proposed tribal facilities, to biological resources are analyzed in Sections 4.2.4 and 4.4.4 of the EA, and adverse impacts of Alternative B would be reduced or avoided with implementation of the mitigation measures identified in Section 5.4 of the EA. Refer to the response to **Comment P998-16** regarding the purpose

and functionality of the proposed RMZs. Refer to the response to **Comment P998-04** regarding wildlife corridors.

P998-28 Comment noted. Refer to the discussion of wildlife corridors in the response to **Comment P998-04**.

Only one wildlife corridor was identified on the project site. Wildlife corridors must provide connectivity between two noteworthy patches of suitable habitat to be considered as such. Wildlife corridors are recognized for their increased potential to support continuous, concentrated, and/or frequent directionalized movement. They differ from a territory or foraging area because the primary function of corridors is to link preferable habitats for many interconnected ecological groups, whereas randomized foraging may be used intermittently by select individuals or associations. Designation is not based on the availability of a water feature; however, in general, the presence of a water feature increases the chance of a particular habitat being used as a corridor by providing resources such as food items and cover. Existing roadways surround the project site on the north and south and a portion of the western boundary, and existing housing developments to the north and east and existing agricultural operations to the west already impede movement. These areas do not provide suitable patches of habitat which wildlife would be motivated to utilize as a travel route.

For a discussion of management of other areas for wildlife which were not designated as a wildlife corridor, refer to the discussion of RMZs in the EA, including **Figure 2-1** and **Figure 2-2**. Also, as discussed in the BA (included as Appendix E of the EA), avoidance measures would consist of the establishment of appropriate buffers around each ephemeral drainage as determined by the Tribe under applicable regulations and of establishment of appropriate buffer areas around each U.S. jurisdictional water feature as determined by a qualified biologist under applicable regulations.

Comments regarding wildlife undercrossing are noted. Installation of such features would be under the discretion of the Tribe and is only potentially applicable on those lands covered by the project site. Comments regarding preference of Alternative B by the commenter compared to Alternative A are also noted.

P998-29 With implementation of appropriate erosion control measures (refer to Section 5.1 of the EA) and maintenance of stream buffers, effects of erosion would be reduced to a minimal level. As described in Section 3.1 of the BA (included as Appendix E of the EA), construction would involve grading and excavation for building pads and roadways. Potential stormwater runoff generated from development of the residential units and associated roadways would be conveyed by a combination of open channels, storm drains, and culverts. Runoff from the project site would be directed into vegetated swales, which would serve as energy dissipaters and filtering mechanisms for runoff generated on site prior to release into the on-site drainage

channels. Stormwater would be retained on site within detention basins prior to discharging off the project site at rates equivalent to pre-development conditions.

P998-30 Comment noted. Refer to the responses to **Comments P998-04** and **P998-28** for a discussion of wildlife corridor features and associated mitigation for identified impacts. Implementation of the avoidance measures described in the BA (included as Appendix E of the EA) and Section 5.4.3 of the Final EA would aid to reduce effects of parcel development. However, except with regard to these measures and other applicable regulations, the Tribe shall determine the optimum placement of development. The commenter's recommendation to cluster development as to provide a smaller environmental footprint is noted.

P998-31 The Arborist Report would be prepared by a qualified arborist selected by the Tribe, who would assess the trees currently present on the project site and develop a suitable mitigation plan for those trees which are concluded to be unavoidable. The comment that the trees in the existing vineyard area may provide suitable acorns is noted. For additional discussion of tree surveys and reporting, refer to **General Response 3.1.16**.

P998-32 Comment noted. Status of "Open Space" areas on the project site would be considered by the Tribe.

P998-33 It is acknowledged that the commenter was able to sufficiently view approximately 75 percent of the project site using only public roadways and binoculars, with no walking survey conducted. This differs from the protocol used by AES biologists and botanists to survey the project site as discussed in the response to **Comment P998-11**.

The commenter's consultation of pre-existing data sources was similar to that conducted by AES. AES performed CNDDB searches of the ten quads surrounding the two central quads covered by the project site. Included in the text of the EA were the documented occurrences within the two central quads covered by the project site: Santa Ynez and Los Olivos. The response to **Comment P998-10** details the parameters used to assess the potential for federally-listed special-status species to occur on the project site.

P998-34 Comment noted. While the comment provides a history of the past uses of the project site in and of itself, there is no comment on either the Proposed Action or the EA. No response is required.

P998-35 Comment noted. While the comment provides a geological background of the project site, including soils that could support vernal pools, the comment does not comment on either the Proposed Action or the EA. No response is required.

P998-36 through **P998-41**

The commenter provides a summary report of the existing biological resources setting for the project site; however, a pedestrian survey of the project site was not conducted by the commenter. The attachment does not provide a comment on the Proposed Action or EA, and therefore no response is required. Refer to the response to **Comment P998-11** for a description of protocols used by AES during biological and botanical surveys performed to survey biological communities on the project site.

Response to Comment Letter P999 – Lawrence E. Hunt

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is identical to that of Comment Letter P998. Refer to the responses to **Comment P998-10** through **P998-41**.

Response to Comment Letter P1000 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P327. Refer to **Response to Comment Letter P327**.

Response to Comment Letter P1001 – Stand Up for California Director Cheryl Schmit

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P308. Refer to **Response to Comment Letter P308**.

Response to Comment Letter P1002 – Bunnie Shepherd Sexton

P1002-01 Refer to **General Response 3.1.10** regarding the existing ROWs on the project site.

Response to Comment Letters P1003 and P1004

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the content of the letters is nearly identical to that of Comment Letter P273. Refer to **Response to Comment Letter P273**.

Response to Comment Letter P1005 – Susan F. Petrovichm, Attorney for Charles Grimm

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P328. Refer to **Response to Comment Letter P328**.

Response to Comment Letter P1006 – Wim van Dam

P1006-01 Refer to the response to **Comment P996-02** regarding the criteria and sources used to assess special-status bird species that have the potential to occur on the project site.

Response to Comment Letters P1007 and P1008

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the letters only provide comments on the fee-to-trust application associated with the EA.

Response to Comment Letter P1009 – W.E. Watch, Inc. President Cathie McHenry

P1009-01 Comment noted.

P1009-02 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P1009-03 Refer to **General Response 3.1.2** regarding the TCA.

P1009-04 Refer to the response to **Comment P289-07** regarding the 50 acres on the existing Reservation and the proposed development plans for the project site. Refer to **General Response 3.1.5** as to the justification for 143 home sites.

P1009-05 Refer to **General Response 3.1.5** for a discussion of the purpose of the trust acquisition process and preference over the County land use approval process. As stated in Section 1.3 of the EA, this trust land acquisition is an integral part of the Tribe's efforts to bring tribal members and lineal descendants back to the Tribe, accommodate future generations, and create a meaningful opportunity for those tribal members and lineal descendants to be a part of a tribal community revitalization effort that rebuilds tribal culture, customs, and traditions. In order to meet these goals, the Tribe needs additional trust land to provide housing for tribal members and lineal descendants who currently are not accommodated with tribal housing.

P1009-06 and **P1009-07**

Refer to **General Response 3.1.9** regarding the adequacy of the analysis of impacts to groundwater resources presented in the EA, which included an assessment of impacts to neighboring wells. Refer to the response to **Comment P178-06** regarding coordination of management of groundwater with the ID1. Refer to **General Response 3.1.10** regarding ROWs on the project site.

P1009-08 Given the withdrawal of the TCA, the Proposed Action is now considered an off-reservation trust acquisition request. Refer to **General Response 3.1.2** regarding the level of review required for off-reservation trust acquisition requests.

P1009-09 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P1009-10 Comment noted.

Response to Comment Letter P1010 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P327. Refer to **Response to Comment Letter P327**.

Response to Comment Letter P1011 – Kelly Gray

P1011-01 and **P1011-02**

Given the withdrawal of the TCA, the Proposed Action is now considered an off-reservation trust acquisition request. Refer to **General Response 3.1.2** regarding the level of review required for off-reservation trust acquisition requests.

Response to Comment Letter P1012 – Santa Ynez Rancho Estates Mutual Water Company, Inc. President Robert B. Field

P1012-01 Comment noted. Refer to **General Response 3.1.1** regarding the comment period deadline on the EA.

P1012-02 Comment noted. The TCA has been withdrawn; refer to **General Response 3.1.2** for further discussion.

P1012-03 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P1012-04 The water usage assumptions presented in the Water and Wastewater Feasibility Study (Appendix C of the Final EA) are prepared consistent with other planning documents in the Santa Ynez Valley. The Tribe is committed to minimizing water demands on the underlying aquifer through conservation efforts such as the installation of low-flow fixtures and eliminating residential lawn watering during County declarations of drought. Water usage was updated in the Final EA given the revisions to the development proposed under Alternatives A and B; refer to **General Response 3.1.9** for further discussion.

P1012-05 The Tribe's development plans for the project site are included in Appendix N of the EA; refer to **General Response 3.1.9** regarding the analysis of water demand presented in the EA. Refer to **General Response 3.1.12** for further discussion of regulation of future development on the project site, including a future casino.

P1012-06 Refer to **General Response 3.1.9** regarding groundwater use.

P1012-07 No casino would be developed on the project site; refer to **General Response 3.1.12** for further discussion.

P1012-08 Potential environmental impacts associated with Alternative B are analyzed throughout Section 4.2 of the EA. For example, the impacts of the estimated traffic trips that would be generated by the tribal facilities are analyzed in Section 4.2.7 of the EA (refer to Table 4-13 of the EA). The Tribe updated the development plan for the tribal facilities as the development of an exhibition hall is no longer economically feasible; refer to **General Response 3.1.17** for further discussion.

P1012-09 Refer to **General Response 3.1.6** regarding the adequacy of the traffic impact analysis presented in the EA.

P1012-10 Impacts to public services are analyzed in Sections 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA. The analysis was prepared in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook. The commenter does not offer any specific details regarding the inadequacy of the public services impact analysis; therefore, a more detailed response cannot be provided.

P1012-11 Refer to the response to **Comment L4-07** regarding the Tribe's development plans for the project site. Refer to **General Response 3.1.7** regarding the adequacy of the analysis of impacts to biological resources presented in the EA.

P1012-12 Refer to the response to **Comment L4-07** regarding the Tribe's development plans for the project site. Refer to the response to **Comment P308-15** regarding the cumulative impact analysis in the EA.

P1012-13 Comment noted. The TCA has been withdrawn; refer to **General Response 3.1.2** for further discussion.

P1012-14 Refer to **General Response 3.1.3** regarding the requirements for an EIS.

Response to Comment Letter P1013 – David and Andriette Culbertson

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P289. Refer to **Response to Comment Letter P289**.

Response to Comment Letter P1014 – Preservation of Los Olivos (P.O.L.O) Board President Kathy Cleary

P1014-01 Comment noted. If a property is approved for trust acquisition, the property is no longer within State and local jurisdiction and is instead under tribal and federal jurisdiction; refer to **General Response 3.1.5** for further discussion.

P1014-02 The impacts of the project alternatives to public health, safety and welfare, property values, taxation, crime, water usage, road repair, and school funding are evaluated by the BIA throughout Section 4.0 of the EA, and adverse impacts would be minimized or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. For example, impacts to groundwater supplies are evaluated in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and mitigation measures included in Section 5.2 of the EA would reduce impacts to a minimal level.

P1014-03 Comment noted.

P1014-04 Refer to **General Response 3.1.3** regarding the requirements for an EIS. The commenter does not provide any specific details to support the conclusions presented in the comment; therefore, a detailed response cannot be provided.

P1014-05 Comment noted.

P1014-06 Comment noted. In accordance with the regulations for land acquisitions (25 CFR Part 151), the Secretary of the Interior has regulatory authority to take lands into trust on behalf of tribes. The BIA has been delegated various responsibilities by the Secretary of the Interior and is thereby the appropriate lead agency to develop the EA. Outside of the Secretary of the Interior, no other agency has appropriate standing to be designated as lead agency for the trust acquisition request by the Tribe.

P1014-07 Refer to **General Response 3.1.3** regarding the adequacy of the EA to provide the BIA with a "hard look" at potentially significant environmental impacts in accordance with NEPA requirements. Comment noted.

P1014-08 Refer to **General Response 3.1.12** regarding the regulation of future development on the project site if the trust acquisition were approved and the potential for a future casino on the project site. Refer to **General Response 3.1.13** regarding the adequacy of the range of alternatives addressed in the EA.

P1014-09 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe.

P1014-10 Refer to **General Response 3.1.5** regarding the purpose and need of the Proposed Action.

P1014-11 Refer to **General Response 3.1.5** regarding the purpose and need of the Proposed Action. The commercial enterprises referenced in the purpose and need refer to the commercial vineyard currently in operation on the project site. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site if the trust acquisition were approved and the potential for a future casino on the project site**.**

P1014-12 Refer to **General Response 3.1.9** regarding groundwater use.

P1014-13 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe. Refer to **General Response 3.1.5** regarding the lack of authority of states and local agencies, including requirements outlined within the SYVCP, over tribal governments unless specifically authorized by the U.S. Congress.

P1014-14 Comment noted. Public services including law enforcement are addressed in Sections 3.10, 4.1.9, 4.2.9, 4.3.9, and 4.4.10 of the EA; as stated therein, no adverse impacts would occur with implementation of the project alternatives.

P1014-15 Refer to **General Response 3.1.8** regarding the cultural significance of the project site to the Tribe.

P1014-16 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe. Refer to the response to **Comment L3-09** regarding the Williamson Act contracts for the parcels that constitute the project site.

P1014-17 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe. Refer to the response to **Comment L3-18** regarding impacts to agricultural resources.

P1014-18 Refer to **General Response 3.1.14** regarding the potential impacts to scenic highways.

P1014-19 Comment noted. Refer to the response to **Comment P207-05** regarding BIA's involvement with the EA and NEPA environmental review process.

P1014-20 Refer to **General Response 3.1.2** regarding the withdrawal of the TCA by the Tribe. Refer to **General Response 3.1.3** for further discussion as to why an EIS is not required.

Response to Comment Letter P1015 – Preservation of Los Olivos (P.O.L.O) Board President Kathy Cleary

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the letter presents appendices to Comment Letter P1014, which do not address the Proposed Action, project alternatives, or analysis presented in the EA.

Response to Comment Letter P1016 – Preservation of Los Olivos (P.O.L.O) Board President Kathy Cleary

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letters P1014 and P1015. Refer to **Response to Comment Letters P1014** and **P1015**.

Response to Comment Letter P1017 – John G. Traller

P1017 Comment noted. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P1018 – Santa Ynez Valley Concerned Citizens Chairman Greg Simon

This comment letter is included in **Table 2-1** in **Section 2.0** as it is part of the administrative record but requires no response as the content of the letter is nearly identical to that of Comment Letter P327. Refer to **Response to Comment Letter P327**.

Response to Comment Letter P1019 – William R. Devine (Attorney for Save The Valley Plan (SVTP))

P1019-01 Comment noted.

P1019-02 Comment noted. The potential impacts of the Proposed Action are evaluated throughout Section 4.0 of the EA, and adverse impacts would be minimized or avoided with implementation of the mitigation measures identified in Section 5.0 of the EA. For example, impacts to groundwater supplies are evaluated in Sections 4.1.2, 4.2.2, 4.3.2, and 4.4.2 of the EA, and mitigation measures included in Section 5.2 of the EA would reduce impacts to a minimal level.

P1019-03 Comment noted. Refer to **General Response 3.1.3** regarding the requirements for an EIS.

P1019-04 Comment noted.

P1019-05 Comment noted. The TCA has been withdrawn and the Final EA has been updated accordingly; refer to **General Response 3.1.2** for further discussion.

P1019-06 Refer to **General Response 3.1.2** regarding the overall purpose of the Proposed Action given the withdrawal of the TCA. Refer to **General Response 3.1.5** as to the justification for 143 home sites.

P1019-07 Refer to **General Response 3.1.13** regarding the adequacy of the range of alternatives selected for detailed analysis within the EA. Refer to **General Response 3.1.12** regarding regulation of future development on the project site.

P1019-08 Nine concept plans are being considered for development on the project site; refer to **General Response 3.1.13** for further discussion. In addition to Alternative A, a one-acre residential site plan was selected as a representative layout to be evaluated in detail in the EA as Alternative B, as described in Section 2.1 of the EA. Alternative B is described in detail in Section 2.0 of the EA. The potential impacts of Alternative B to environmental resources are evaluated in Section 4.2 of the EA, and adverse impacts of Alternative B would be reduced or minimized with the implementation of the mitigation measures identified in Section 5.0 of the EA. Refer to **General Response 3.1.12** regarding regulation of future development on the project site.

P1019-09 Refer to **General Response 3.1.9** regarding the potential impacts to groundwater resources analyzed within the EA. Refer to **General Response 3.1.12** regarding regulation of future development on the project site.

P1019-10 Refer to **General Response 3.1.7** regarding the adequacy of the analysis of impacts to biological resources presented in the EA. Refer to **General Response 3.1.16** regarding the adequacy of the proposed mitigation measures to reduce impacts to oak trees and oak tree habitat. Refer to **General Response 3.1.12** regarding regulation of future development on the project site.

P1019-11 Potential impacts to socioeconomic conditions and environmental justice are addressed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA; as discussed therein, no adverse impacts would occur. The project site is currently uninhabited open space and is owned in fee by the Tribe; therefore, no residents of Santa Ynez Valley would be displaced if the Proposed Action were approved. Development of 143 residential units on the 1,433-acre project site is not anticipated to affect property values in the area. Socioeconomic impacts are analyzed in Sections 4.1.6, 4.2.6, 4.3.6, and 4.4.6 of the EA in accordance with the CEQ Regulations for Implementing NEPA and the BIA NEPA Guidebook.

P1019-12 Refer to **General Response 3.1.10** regarding the adequacy of the analysis of impacts to land use presented in the EA.

P1019-13 Refer to **General Response 3.1.14** regarding impacts of the proposed development to visual resources.

P1019-14 Comment noted. The commenter did not provide specific details as to why the commenter believes that the conclusions regarding land resources, air quality, transportation and

circulation, public services, and noise are unsupported in the EA. Therefore, a detailed response cannot be provided. Potential impacts to health and safety are addressed throughout Section 4.0 of the EA. For example, the potential impact of traffic noise is evaluated in Sections 4.1.10, 4.2.10, 4.3.10, and 4.4.9 of the EA; as discussed therein, no adverse impacts would occur during construction or operation of either project alternative.

P1019-15 Refer to **General Response 3.1.3** regarding the adequacy of the EA and requirements for an EIS.

Response to Comment Letter P1020 – J. Andrew Caldwell with Coalition of Agriculture and Business (COLAB)

P1020-01 Comment noted.

P1020-02 Comment noted. Refer to **General Response 3.1.12** regarding the regulation of future development on the project site. Refer to **General Response 3.1.11** regarding lost tax revenue.

P1020-03 Refer to **General Response 3.1.5** regarding the preference of the fee-to-trust process compared to the County land use approval process. Refer to **General Response 3.1.15** for non-substantive comments or opinions.

Response to Comment Letter P1021 – James E. Marino (Attorney for No More Slots)

P1021-01 Comment noted.

P1021-02 Comment noted. The TCA has been withdrawn and the Final EA has been updated accordingly; refer to **General Response 3.1.2** for further discussion.

P1021-03 The appendices attached to the EA are necessary to provide the detailed data and analysis used to support the conclusions presented within the EA. For example, the wastewater generation rates are summarized in Section 4.1.2 of the EA but are presented in detail in the Water and Wastewater Feasibility Analysis, which is included as Appendix C of the EA.

P1021-04 Refer to the response to **Comment P1014-06** regarding the BIA's role in the trust acquisition process. Refer to **General Response 3.1.2** regarding the TCA.

P1021-05 Comment noted. Refer to the response to **Comment P207-05** regarding BIA's involvement with the EA and NEPA environmental review process.

P1021-06 through **P1221-09**

Refer to the response to **Comment P328-20** regarding consultation during preparation of the EA. The TCA has been withdrawn and the Final EA has been updated accordingly; refer to

General Response 3.1.2 for further discussion, including the level of detail required for review of an off-reservation trust acquisition request. Refer to **General Response 3.1.3** regarding the adequacy of the EA.

P1021-10 The commenter misinterprets the requirement of the Tribe's Tribal-State Gaming Compact (Compact). The Compact requires that the Tribe develop an environmental ordinance establishing a methodology to assess off-reservation impacts of a project related to the casino. This environmental review process is not applicable to the Proposed Action, and CEQA is neither applicable nor required.

Response to Comment Letter P1022 – James E. Marino (Attorney for No More Slots)

P1022-01 and **P1022-02**

Comment noted. Refer to **General Response 3.1.2** regarding the TCA.

P1022-03 Refer to **General Response 3.1.8** regarding the cultural significance of the project site to the Tribe. Refer to the response to **Comment L4-03** regarding the authority of the Secretary of the Interior to place the project site into trust for the Tribe.

P1022-04 Refer to **General Response 3.1.2** regarding the TCA.

P1022-05 Refer to **General Response 3.1.2** regarding the TCA. Refer to the response to **Comment L4-03** regarding the authority of the Secretary of the Interior to place the project site into trust for the Tribe.

It appears the commenter may have intended to include additional pages in **Comment Letter P1022** that may have contained additional comments on the EA, Proposed Action, and/or project alternatives. However, no additional documentation was provided by the commenter, and the pages included in **Comment Letter P1022** in **Section 2.0** are all pages that were received by the BIA. Accordingly, no additional responses are provided for **Comment Letter P1022**.

Response to Comment Letters P1023 through P1086

These comment letters are included in **Table 2-1** in **Section 2.0** as they are part of the administrative record but require no response as the letters only provide comments on the fee-to-trust application associated with the EA.

3.2.5 Comment Letters Received Past the Deadline

Comment Letters P1087 through P1102 were received by the BIA after the comment period deadline of November 18, 2013. These letters were reviewed and are included in the administrative record. The comments contained within these comment letters received after the deadline do not present any new topics or issues that are not already presented in the comment letters received within the comment period.

Accordingly, the responses to Comment Letters S1 through S8, L1 through L19, and P1 through P1086 address the comments presented in Comment Letters P1087 through P1102. Refer to **Responses to Comment Letters S1** through **S8**, **L1** through **L19**, and **P1** through **P1086**.

CHAPTER 4.0
REFERENCES

American Land Title Association (ALTA), 2013. ALTA/ACSM Land Title Survey. Certificates of Compliance 2011-105580 through 2001-105584, Portions of Lands Shown on the Map of the Subdivisions of Canada De Los Pinos or College Rancho, Rack 3, Map 4, Santa Barbara County, CA. Date of Map: April 5, 2013. Surveyed by: George Marchenko, LS 6964.

Archaeology Assessment and Management, 2011. Phase 1 and 1.5 Archaeological Investigations for the Project 1390/Camp Four/Parker Ranch. June 2011. Confidential (not for public distribution; official and professional use only).

Bureau of Indian Affairs (BIA), 2012. Indian Affairs National Environmental Policy Act (NEPA) Guidebook. August 2012. Available online at: http://www.bia.gov/cs/groups/xraca/documents/text/idc009157.pdf. Accessed November 12, 2013 by AES Staff.

California Department of Finance, 2012. E-4 Population Estimates for Cities, Counties, and the State, 2001-2010, with 2000 & 2010 Census Counts. Sacramento, California. Last revised November 9, 2012. Available online at: http://www.dof.ca.gov/research/demographic/reports/estimates/e-4/2001-10/view.php. Accessed by AES staff on February 25, 2014.

California Department of Finance, 2013. E4 Population Estimates for Cities, Counties, and the State, 2011-2013, with 2010 Benchmark. Sacramento, California. Last revised May 10, 2013. Available online at: http://www.dof.ca.gov/research/demographic/reports/estimates/e-4/2011-20/view.php. Accessed by AES staff on February 25, 2014.

California Department of Fish and Wildlife (CDFW), 2003. RareFind 3 Version 3.1.0, California Natural Diversity Data Base. Natural Heritage Division, CNDDB, Sacramento, California. Updated on March 2, 2012. Accessed on March 19, 2012.

California Department of Fish and Wildlife (CDFW), 2005. Habitat Classification Rules: California Wildlife Habitat Relationships System. California Interagency Wildlife Task Group. April, 2005. Available online at: https://www.dfg.ca.gov/biogeodata/cwhr/pdfs/cwhr_rules.pdf.

California Department of Fish and Wildlife (CDFW), 2009. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. State of California. California Natural Resources Agency, Department of Fish and Game. November 24, 2009.

California Department of Resources Recycling and Recovery (CalRecycle), 2006. Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups. June 2006. Available online at:

http://www.calrecycle.ca.gov/Publications/Documents/Disposal/34106006.pdf. Accessed by AES Staff on February 12, 2014.

California Department of Transportation (Caltrans), 2002. Caltrans Guide for the Preparation of Traffic Impact Studies. December 2002.

California Emissions Estimator Model (CalEEMod) 2013.2.2, 2013. Computer modeling program, Version 2.2. Available online at http://www.aqmd.gov/caleemod/download.htm.

California Department of Water Resources (DWR). 2004. Bulletin 118. Available online at: http://www.dpla2.water.ca.gov/publications/groundwater/bulletin118/basins/pdfs_desc/1-55.01.pdf. Accessed: October 2008.

California Department of Water Resources (DWR). 2013. Groundwater Management: Court Adjudications. Last updated July 24, 2013. Available at: http://www.water.ca.gov/groundwater/gwmanagement/court_adjudications.cfm. Accessed: March 19, 2014.

Institute of Transportation Engineers, 2008. Trip Generation Report, 8th Edition.

L&P Consultants, 2014. Letter to Mr. Chip Wulbrandt, Price, Postal & Parma, LLP regarding Camp 4 Property. April 30, 2014.

Santa Barbara County, 2008. Environmental Thresholds and Guidelines Manual. October, 2008. Available online at: http://www.sbcountyplanning.org/pdf/ManualsReports/Manuals/Environmental%20Thresholds%20October%202008%20corrected%206-1-2009.pdf. Accessed May 5, 2014.

Santa Barbara County, 2009a. Santa Ynez Valley Community Plan; Adopted October 6, 2009. Available online at: http://longrange.sbcountyplanning.org/planareas/santaynez/documents/Board%20of%20Supervisors%20Adoption/Electronic%20Docket/Master%20Final%2010-15-09.pdf. Accessed December, 2011.

Santa Barbara County, 2009b. Final Santa Ynez Valley Community Plan Environmental Impact Report (EIR). September 2009. Available online at: http://longrange.sbcountyplanning.org/planareas/santaynez/sy_EIR.php. Accessed April 24, 2014.

Santa Barbara County, 2011a. Santa Barbara County Comprehensive Plan; Amended 1980, Adopted February 2011. Available online at: http://longrange.sbcountyplanning.org/general_plan.php. Accessed December, 2011.

Santa Barbara County, 2011b. Santa Barbara County Implementing Ordinances; Land Use and Development Codes and Zoning Ordinances. Available online at:

http://www.sbcountyplanning.org/permitting/ldpp/auth_reg/ordinances.cfm#chapter35. Accessed December, 2011.

Santa Barbara County, 2012. Santa Barbara County 2011 Groundwater Report. May 1, 2012. Available online at: http://www.countyofsb.org/uploadedFiles/pwd/Water/WaterAgency/Report%20Document%20FINAL.pdf. Viewed on March 5, 2014.

Santa Barbara County, 2014. Santa Barbara County – Cumulative Projects Map. June, 2012. Available online at: http://www.arcgis.com/home/webmap/viewer.html?webmap=8d94e5b903be47d2ad1d8c35af7c9635. Viewed on April 30, 2014.

Santa Ynez Band of Chumash Indians, 2000. Tribal Ordinance Regarding Oak Tree Preservation for the Santa Ynez Band of Chumash Indians

Tetra Tech, 2010. Assessment of Groundwater Availability on the Santa Ynez Chumash Reservation. March 2010.

Urban Emissions (URBEMIS), 2007. California Air Resource Board approved air quality emissions model program, using EMFAC, 2007 emission factors.

Urban Planning Concepts, 2014. Interim Memo on Historical Review, Land use Considerations; Camp 4. February 25, 2014.

U.S. Census Bureau, 2014. State & County QuickFacts: Solvang (city), California. Available at: http://quickfacts.census.gov/qfd/states/06/0672576.html. Accessed by AES staff on February 19, 2014.

U.S. Environmental Protection Agency (USEPA), 2012. Guidelines for Water Reuse. Available online at: http://water.epa.gov/infrastructure/sustain/availability_wp.cfm.

U.S. Fish and Wildlife Service (USFWS), 1976, 1981, 1984, and 2006. National Wetlands Inventory. Available online at: http://www.fws.gov/wetlands/.

U.S. Fish and Wildlife Service (USFWS), 2005. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Portland, Oregon. Available at: http://www.fws.gov/sacramento/es/Recovery-Planning/Vernal-Pool/es_recovery_vernal-pool-recovery.htm. Accessed on March 20, 2009.

U. S. Fish and Wildlife Service (USFWS), 2011. List and Candidate Species that may Occur in the Vicinity of the Proposed Project, Santa Barbara County, California. Dated November 16, 2011. U.S. Department of the Interior, Fish and Wildlife Service, Ventura Fish and Wildlife Office, Ventura, California.

APPENDIX P

RESOLUTION #926A – APPROVAL OF WITHDRAWAL OF TRIBAL CONSOLIDATION AND ACQUISITION PLAN (NEW)

Santa Ynez Band of Chumash Indians
P.O. Box 517 • Santa Ynez, CA 93460
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October 11, 2013

Ms. Amy Dutschke, Director
BIA Pacific Region
2800 Cottage Way
Sacramento, CA 95825

~~IN RE: June 17, 2013 Decision by Pacific Regional Director to Approve Land~~
Consolidation and Acquisition Plan of the Santa Ynez Band of Chumash Indians;
REQUEST TO WITHDRAW PLAN WITHOUT PREJUDICE;
AND DISMISS IBIA APPEAL WITHOUT PREJUDICE.

Dear Pacific Regional Director Dutschke:

The Santa Ynez Band of Chumash Indians hereby withdraws without prejudice the following:

That Tribal Consolidation Area (TCA) application dated March 27, 2013 as approved on June 17, 2013.

In addition, Resolution #926 Santa Ynez Band of Chumash Indians—Tribal Land Consolidation Area is hereby superseded by Resolution #926A Santa Ynez Band of Chumash Indians—Withdrawal Without Prejudice of Tribal Land Consolidation Area, an original of which is attached hereto.

Please dismiss any appeals to such TCA without prejudice also.

Sincerely,

Vincent P. Armenta
Tribal Chairman

CC:

Interior Board of Indian Appeals
Office of Hearings and Appeals
U.S. Department of the Interior
801 N. Quincy Street, Suite 300
Arlington, VA 22203
703-235-3816 (phone)
703-235-3799 (facsimile)

Santa Ynez Band of Chumash Indians
P.O. Box 517 • Santa Ynez, CA 93460
805-688-7997 • Fax 805-686-9578
www.santaynezchumash.org

RESOLUTION #926A

Re: **Santa Ynez Band of Chumash Mission Indians–Tribal Land Consolidation Area; ~~WITHDRAWAL WITHOUT PREJUDICE~~**

Whereas: The Santa Ynez Band of Chumash Indians (the 'Tribe') is a federally recognized Indian Tribe under the United States Department of the Interior, Bureau of Indian Affairs; and

Whereas: The Tribal Business Committee of the Santa Ynez Band of Chumash Indians is the duly authorized body of the Tribe to exercise full governmental responsibilities, and is empowered to make tribal policy and carry out tribal business; and

Whereas: The Santa Ynez Chumash have an approximately 137 acre Reservation much of it is undevelopable wetlands and riverbanks of the Zanja De Cota Creek. Housing and government buildings cover the remainder of the Reservation.

Whereas: Such 137 acre Santa Ynez Reservation is part of a larger approximately 11,500 acre parcel that was the basis for a quiet title action by the Bishop of Monterey in 1897. Such quiet title action was against the individual members of the Santa Ynez Band of Chumash Indians and the Indian Agent at that time to cut off any legal rights they had as to such parcel.

Whereas: By Resolution #926, the Tribe requested the designation of such approximately 11,500 acre parcel as a Tribal Consolidation Area (TCA). The Tribe would now like to withdraw without prejudice such request to designate such TCA.

Now Therefore Be It Resolved that the Santa Ynez Band of Chumash Indians hereby requests that the application to the Secretary or his designee dated March 27, 2013 for a Tribal Consolidation Area pursuant to 25 CFR 151.2(h) and 25 CFR 151.3(j)(1) be WITHDRAWN WITHOUT PREJUDICE, and authorizes the Chairman of the Tribe (or the Vice Chairman if the Chairman is unavailable) to negotiate, sign, and execute any and all documents required or necessary to implement such WITHDRAWAL WITHOUT PREJUDICE.

This resolution supersedes any previous Tribal resolutions.

CERTIFICATION

This is to certify that the foregoing resolution was adopted by the Santa Ynez Business Committee at a duly called meeting of the Tribal Business Committee on Oct. 9, 2013 by a vote of 4 in FAVOR, 0 OPPOSED, and 0 ABSTAINING.

Vincent Armenta, Chairman

Richard Gomez, Vice Chairman

Kenneth Kahn, Secretary-Treasurer

David Dominguez, Committee Member

Gary Pace, Committee Member

APPENDIX Q

INTERIOR BOARD OF APPEALS ORDER VACATING DECISION AND DISMISSING CASE AS MOOT (NEW)

United States Department of the Interior

OFFICE OF HEARINGS AND APPEALS
INTERIOR BOARD OF INDIAN APPEALS
801 NORTH QUINCY STREET
SUITE 300
ARLINGTON, VA 22203

COUNTY OF SANTA BARBARA, CALIFORNIA; NO MORE SLOTS; NEIGHBORHOOD DEFENSE LEAGUE OF CALIFORNIA; NANCY CRAWFORD-HALL; CONCERNED CITIZENS OF THE SANTA YNEZ VALLEY, MEADOWLARK RANCHES ASSOCIATION, and SANTA YNEZ VALLEY ASSOCIATION OF REALTORS; PRESERVATION OF LOS OLIVOS and PRESERVATION OF SANTA YNEZ; SAVE THE VALLEY PLAN; W.E. WATCH, INC.; SANTA YNEZ RANCHO ESTATES MUTUAL WATER COMPANY, INC.; MARY KIANI, TRUSTEE, KIANI FAMILY REMAINDER TRUST; and SANTA YNEZ RIVER WATER CONSERVATION DISTRICT, IMPROVEMENT DISTRICT NO. 1 Appellants, v. PACIFIC REGIONAL DIRECTOR, BUREAU OF INDIAN AFFAIRS, Appellee.	)	Order Vacating Decision and Dismissing Case as Moot Docket Nos. IBIA 14-001 14-003 14-004 14-005 14-006 14-007 14-009 14-010 14-018 14-019 14-020 October 24, 2013

Appellants seek review of a June 17, 2013, decision (Decision) of the Pacific Regional Director (Regional Director), Bureau of Indian Affairs (BIA) approving a tribal Land Consolidation and Acquisition Plan (Plan) proposed by the Santa Ynez Band of Chumash Indians (Tribe). The Board now dismisses this case as moot because the Tribe has withdrawn its Plan.

Background

The Tribe submitted a "Land Consolidation and Acquisition Plan" to the Regional Director for approval under BIA's land-into-trust regulations at 25 C.F.R. §§ 151.2(h) (definition of "tribal consolidation area")[1] and 151.3(a)(1) (land acquisition policy).[2] The Plan identifies an approximately 11,500-acre area—which purportedly "was part of the Tribe's ancestral territory and comprised most of its historic territory," and which is outside the Tribe's roughly 137-acre current reservation—as the Tribe's area of focus for possible future trust acquisitions. Plan at 2-3, 8-9 & Ex. A (map). The Plan construes § 151.3(a)(1) as providing that "tribal consolidation areas, like on-reservation or adjacent lands, do not require the high level of scrutiny that off-reservation acquisitions do, and further affords such acquisitions a greater level of credibility as part of a plan which has already been reviewed and approved by the BIA." Plan at 2.

The Regional Director approved the Plan pursuant to §§ 151.2(h) and 151.3(a)(1). *See* Decision. The Decision states that "[a]ll acquisition applications submitted pursuant to said plan shall be considered within the Secretary's discretion and under all applicable laws and regulations, including the National Environmental Policy Act of 1969." *Id.* Thus, BIA's approval of the Plan did not signify its evaluation and approval of any application to place land into trust. *See id.* Through a letter dated June 19, 2013, the Acting Regional Director notified the Tribe that the Plan had been approved. It appears that BIA neither sought public comment on the Plan nor issued a public notice of the Decision.

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[1] Section 151.2(h) defines a tribal consolidation area as "a specific area of land with respect to which the tribe has prepared, and the Secretary has approved, a plan for the acquisition of land in trust status for the tribe."

[2] Section 151.3(a)(1) states that, "Subject to the provisions contained in the acts of Congress which authorize land acquisitions, land may be acquired for a tribe in trust status: (1) When the property is located within the exterior boundaries of the tribe's reservation or adjacent thereto, or within a tribal consolidation area." For the sake of completeness, we note that under the policy, land may also be acquired in trust for a tribe "(2) [w]hen the tribe already owns an interest in the land; or (3) [w]hen the Secretary determines that the acquisition is necessary to facilitate tribal self-determination, economic development, or Indian housing." 25 C.F.R. § 151.3(a)(2)-(3).

Numerous parties filed appeals of the Decision, alleging procedural and substantive errors.[3] The Board consolidates all of the appeals and now dismisses this case as moot. After several of the appeals were filed, the Tribe sent to the Regional Director, with a copy to the Board, a letter in which the Tribe withdrew its Plan without prejudice. *See* Letter from Tribal Chairman to Regional Director, Oct. 11, 2013. The Tribe also requested that BIA "dismiss any appeals to such [tribal consolidation area] without prejudice." *Id.*

Discussion

The Board, while recognizing that it is not bound by the case-or-controversy requirement set forth in the U.S. Constitution, art. III, § 2, has in the interest of administrative economy consistently applied the doctrine of mootness. *See Pueblo of Tesuque v. Acting Southwest Regional Director*, 40 IBIA 273, 274 (2005) (citing *Estate of Peshlakai v. Area Director, Navajo Area Office*, 15 IBIA 24, 32-33 (1986)). "Mootness may arise in various contexts, but each is based on the requirement that an active case or controversy be present at all stages of litigation." *Pueblo of Tesuque*, 40 IBIA at 274 (citations omitted).

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[3] On September 26 the Board consolidated six appeals, after which five more were received. The appeals have been docketed as follows: County of Santa Barbara, California (Dkt. No. IBIA 14-001); No More Slots (Dkt. No. IBIA 14-003); Neighborhood Defense League of California (Dkt. No. IBIA 14-004); Nancy Crawford-Hall (Dkt. No. IBIA 14-005); Concerned Citizens of the Santa Ynez Valley, Meadowlark Ranches Association, and Santa Ynez Valley Association of Realtors (Dkt. No. IBIA 14-006); Preservation of Los Olivos and Preservation of Santa Ynez (Dkt. No. IBIA 14-007); Save the Valley Plan (Dkt. No. IBIA 14-009); W.E. Watch, Inc. (Dkt. No. IBIA 14-010); Santa Ynez Rancho Estates Mutual Water Company, Inc. (Dkt. No. IBIA 14-018); Mary Kiani, Trustee, "Kiani Family Rem[a]inder Trust" (Dkt. No. IBIA 14-019); and Santa Ynez River Water Conservation District, Improvement District No. 1 (Dkt. No. IBIA 14-020).

The Board received entries of appearance from the following parties: Charles Grimm, Grimm Investments, LLC, Michael Sinclair, Lynn Sinclair, Paul Skinner, Robin Hunt, Jr., Vicki Schuman Hunt, Thomas J. Barrack, Donald Petroni, Ann Petroni, Lawrence Grassini, Kathleen S. Grassini, Grassini Vineyard, LLC, Tom Stull, Deborah Stull, Aspen Properties, Michael Focht, Sandra Focht, Gerald Thomas, Janet Thomas, Priscilla Tamkin, James Vogelzang, Mary Beth Vogelzang, Julie McGinley, Jack McGinley, Shawn Addison, Antoinette Addison, Kentucky West, Donald Shackelford, Kim Shackelford, Santa Barbara Vineyards, LLC, Roger K. Bower, Joe E. Kiani, Mary Kiani, Santa Ynez River Water Conservation District, Improvement District No. 1, and the Tribe.

Additionally, we received a letter from Santa Ynez Valley Alliance providing "comments" in opposition to the Decision.

The Board may well dismiss an appeal as moot when, as a result of a change in the circumstances that gave rise to the appeal, the Board determines that "nothing turns on its outcome." *Id.* (citation omitted). In *Pueblo of Tesuque*, the Board dismissed as moot an appeal, the aim of which was to terminate a utility right-of-way (ROW), when the utility informed the Board that it no longer intended to use the ROW. *Id.* at 274-75. The Board explained that, "whether or not the Regional Director's decision was correct or incorrect, the active case or controversy over [the utility's] use of Pueblo lands no longer exists." *Id.* at 275. In accordance with *Pueblo of Tesuque*, in *Hamaatsa, Inc. v. Southwest Regional Director*, 55 IBIA 132, 134-35 (2012), we dismissed an appeal of a regional director's decision to acquire land in trust as moot when the tribe withdrew its application.

Now that the Tribe has withdrawn the Plan, the Regional Director's decision to approve the Plan has lost whatever significance, if any, it might otherwise have carried. We conclude that nothing may now turn on the outcome of a decision by the Board on Appellants' appeal of the Regional Director's decision. Accordingly, we dismiss this case as moot.

We recognize the possibility that issues could re-emerge in a new controversy. But that does not mean that the original controversy is not moot. Appellants' filing of their appeals precluded the Decision from taking effect, *see* 25 C.F.R. § 2.6, and consequently should the Tribe resubmit its original Plan, or submit a new plan for approval, BIA must consider the situation with a "clean slate," *Hamaatsa*, 55 IBIA at 135, without regard for the Decision. An order of vacatur is therefore unnecessary as a matter of law. *See id.* Nevertheless, in the interest of clarity and because parties sometimes seek to attach continuing significance to a moot decision, we vacate the Regional Director's decision. *See id.* (citing *Pueblo of Tesuque*, 40 IBIA at 275; *Paul Spicer v. Eastern Oklahoma Regional Director*, 50 IBIA 328, 333 (2009)).

Therefore, pursuant to the authority delegated to the Board of Indian Appeals by the Secretary of the Interior, 43 C.F.R. § 4.1, the Board dockets the appeals, vacates the Regional Director's June 17, 2013, decision, and dismisses this case as moot.

I concur:

Thomas A. Blaser
Administrative Judge

Steven K. Linscheid
Chief Administrative Judge

County of Santa Barbara, et al. v. Pacific Regional Director, Bureau of Indian Affairs
Docket Nos. IBIA 14-001, -003, -004, -005, -006, -007, -009, -010, -018, -019, & -020
Order Vacating Decision and Dismissing Case as Moot
Issued October 24, 2013
58 IBIA 57

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APPENDIX R

USFWS INFORMATION CONSULTATION LETTER (NEW)

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825

MAR 1 1 2014

U.S. Fish and Wildlife Service
Attention: Steve Henry
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003

Dear Mr. Henry:

The Bureau of Indian Affairs (BIA), Pacific Regional Office, hereby submits this informal consultation request under Section 7 of the Endangered Species Act (ESA) for the proposed fee-to-trust land acquisition (Proposed Action) in Santa Barbara County, California for the Santa Ynez Band of Chumash Indians (Tribe). The Proposed Action will include the development of either 143 five-acre residential lots or alternatively 143 one-acre residential lots for tribal members and would include the conveyance of approximately 1,433± acres (Project Site) into Federal trust status for the benefit of the Tribe, as described in the Environmental Assessment (EA) dated August 2013. The August 2013 EA can be viewed in its entirety online at the following address: http://www.chumashea.com/. A Final EA is currently being prepared that considers comments received on the August 2013 EA.

Federally Listed Species
The November 2013 Biological Assessment (BA) addresses all potentially occurring federally listed species in the vicinity of the Project Site. No federally listed species are known to occur on the Project Site. The following is a review of the potentially occurring federally listed species for the Project Site as outlined in greater detail in the enclosed BA.

The following listed species may be affected by the Proposed Action:

- Federal threatened vernal pool fairy shrimp (*Branchinecta lynchi*, VPFS); and
- Federal threatened California red-legged frog (*Rana aurora draytonii*, CRLF).

The action area addressed within the BA falls within critical habitat for:

- Federal threatened vernal pool fairy shrimp (*Branchinecta lynchi*, VPFS).

As described in the enclosed BA, the Proposed Action may affect but is not likely to adversely affect VPFS. No VPFS were observed during the three focused surveys performed on the site in 2011 and 2012, in part because the seasonal wetlands did not contain water during any of the three surveys. In addition, no seasonal wetlands with hydrological connectivity occur within 250 feet of the seasonal wetlands proposed to be impacted. Nonetheless, for the purposes of ESA/NEPA compliance, we are assuming the presence of VPFS on the Project Site. Even with assumed

presence on the Project Site, implementation of the recommended mitigation measures described in the BA and EA will ensure that any potential impacts will be less-than-significant or completely avoided.

The Proposed Project may affect but is not likely to adversely affect CRLF. No CRLF have been observed on the project site. The project site does not provide breeding habitat for CRLF. The Proposed Project could impact CRLF should it be determined that CRLF occupy the wetland features occurring outside of the Project Site. For the purposes of ESA/NEPA compliance, we are assuming the presence of CRLF on the Project Site. Even with assumed presence in the vicinity of wetlands occurring outside of the Project Site, implementation of the recommended mitigation measures described in the BA and EA will ensure that any potential impacts will be less-than-significant or completely avoided.

As described in the enclosed BA, the project site does not provide habitat for any federally listed plant species. In addition, no special-status plant species have been observed within the project site during any of the floristic surveys that have been conducted to date.

The BIA has determined that the revised Proposed Action **may affect but is not likely to adversely affect** VPFS or CRLF and is anticipated to have **no effect** on special status plant species based on the surveys conducted and the protective mitigation measures that are proposed, and hereby requests your concurrence with this finding.

Please do not hesitate to contact Chad Broussard, Environmental Protection Specialist, at (916) 978-6165 if you have any questions or would like to discuss further.

Sincerely,

Amy Dutschke

Regional Director

Enclosure

BIOLOGICAL ASSESSMENT

SANTA YNEZ BAND OF CHUMASH INDIANS
CAMP 4 FEE-TO-TRUST

NOVEMBER 2013

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825-1846

BIOLOGICAL ASSESSMENT

SANTA YNEZ BAND OF CHUMASH INDIANS
CAMP 4 FEE-TO-TRUST

NOVEMBER 2013

LEAD AGENCY:

U.S. Department of the Interior
Bureau of Indian Affairs
Pacific Region Office
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PREPARED BY:

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TABLE OF CONTENTS

BIOLOGICAL ASSESSMENT
CHUMASH CAMP 4 FEE-TO-TRUST ACQUISITION

LIST OF FIGURES

ATTACHMENTS

1.0 INTRODUCTION

This Biological Assessment (BA) has been prepared in support of an application to the Bureau of Indian Affairs (BIA) to place the approximately 1,433-acre project site (project site) into federal trust status on the behalf of the Santa Ynez Band of Chumash Indians (Tribe) for the development of either 143 five-acre (Alternative A, Proposed Project) or 143 one-acre (Alternative B, Reduced Impact Alternative) residential lots for tribal members. This BA has been prepared to document the extent to which the Proposed Project may affect federally listed species and to facilitate consultation with the U.S. Fish and Wildlife Service (USFWS), in accordance with the legal requirements set forth under Section 7 of the Federal Endangered Species Act (FESA) (16 U.S.C. 1536 [c]). An Environmental Assessment (EA) has been submitted to the BIA for approval of the project (AES, 2013). The EA evaluates impacts associated with the three alternatives: the Proposed Project, a reduced impact alternative, and a no project alternative. This BA evaluates impacts associated with the Proposed Project, described as Alternative A in the EA, because it has the greatest potential impact of the three alternatives. Should the decision maker determine that the preferred project be the reduced impact alternative, the potential impacts would be less than those discussed within this BA.

For the purposes of this BA, federally listed species include those plant and animal species that are listed as endangered or threatened, formally proposed for listing, or candidates for listing under the FESA.

To fulfill its purpose, this BA:

- Characterizes the habitat types present within the project site;
- Evaluates the potential for the occurrence of federally listed endangered, threatened, proposed, or candidate species within the project site;
- Assesses the potential for the Proposed Project to adversely impact federally listed endangered, threatened, proposed, or candidate species; and
- Recommends mitigation measures designed to avoid or minimize project-related impacts.

1.1 THREATENED, ENDANGERED, PROPOSED THREATENED, AND PROPOSED ENDANGERED SPECIES

The following listed species may be affected by the Proposed Action:

- Federal threatened vernal pool fairy shrimp (*Branchinecta lynchi*; VPFS); and
- Federal threatened California red-legged frog (*Rana aurora draytonii*; CRLF).

1.2 CRITICAL HABITAT

The action area addressed within this document falls within critical habitat for:

- Federal threatened vernal pool fairy shrimp (*Branchinecta lynchi*; VPFS).

2.0 PROJECT LOCATION/ACTION AREA

The project site is located east of the Town of Santa Ynez, 3.95 miles east of the City of Solvang, and 22.2 miles northwest of the City of Santa Barbara, California (**Figure 1**). The project site is situated within Section 8, Township 6 North, Range 30 West, of the Santa Ynez, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (quad). The centroid of the project site is 39° 36' 52.92" North 120° 2' 55.64" West. The project site is bound by State Route (SR) 154 to the west, by Armour Ranch Road to the south, by Baseline Avenue to the north, and by residential development/agricultural land to the east (**Figure 2**). Elevation within the project site ranges from approximately 640 feet in the central-west to approximately 810 feet in the northeast. A topographic map and an aerial photograph of the project site are provided in **Figures 2** and **3**, respectively.

3.0 PROJECT DESCRIPTION

3.1 PROJECT COMPONENTS

The Proposed Project consists of two main components: (1) the placement of 5 parcels totaling approximately 1,433 acres (the 5 parcels encompass a total of 4 assessors parcel numbers (APN): APN 141-121-051, APN 141-140-10, APN 141-230-023 and APN 141-240-002) into federal trust status for the Tribe; and (2) the development of 143 five-acre residential plots with the remaining acreage dedicated to agriculture, open space/recreational, conservation of riparian corridors and oak woodland, and development of utilities. Development of the site would include domestic water connections, a wastewater treatment plant (WWTP), and supporting roads and infrastructure. The project design is provided in **Figure 4**. The Components of the Proposed Project are described in more detail below.

Land Trust Action

The Proposed Project consists of the fee simple conveyance of 5 parcels totaling 1,433± acres (referred to as the Camp 4 site) into federal trust status for the benefit of the Tribe. This trust action would shift civil regulatory jurisdiction over the 1,433 acres from the State of California (State) and Santa Barbara County (County) to the Tribe and the BIA.

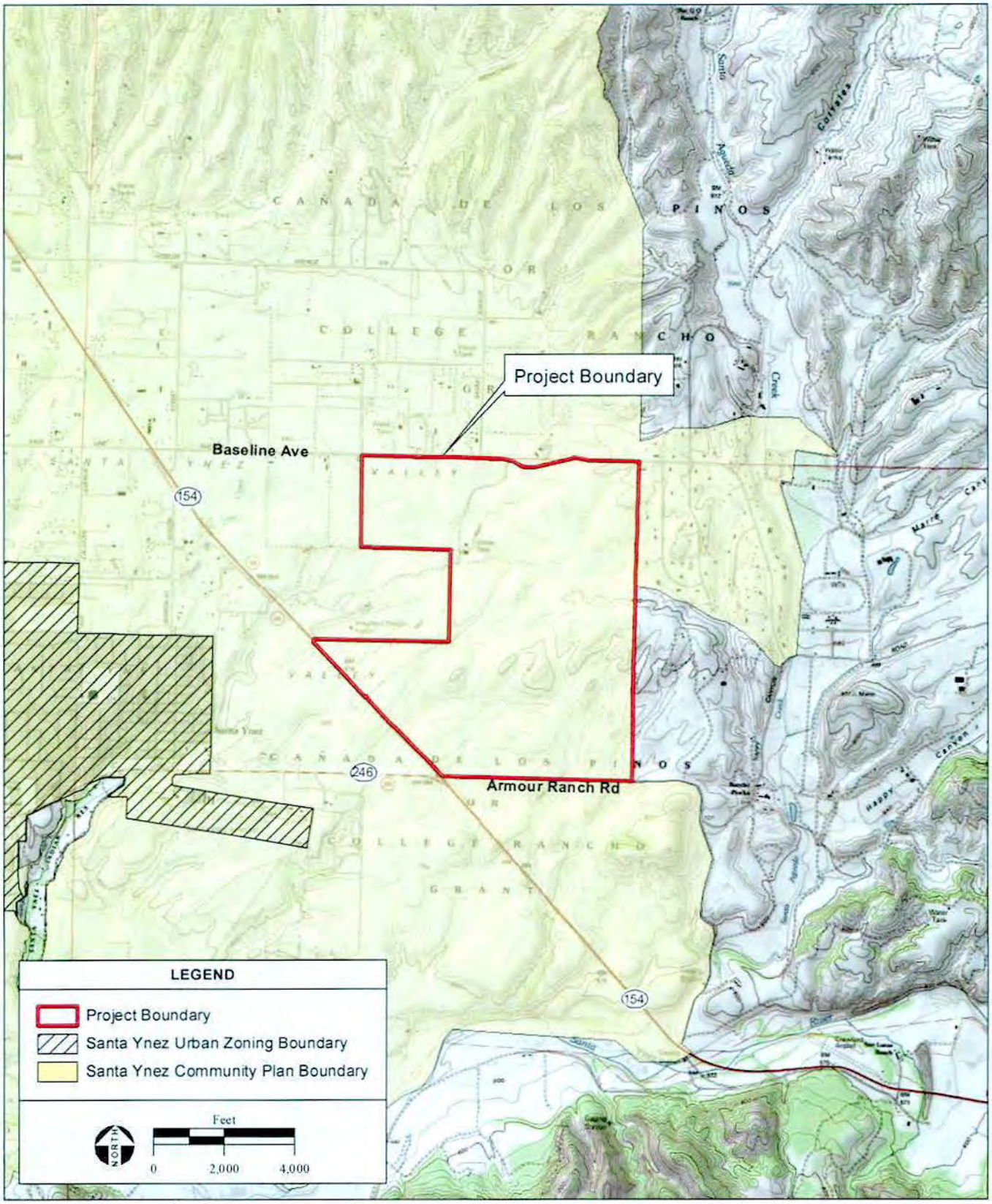
Proposed Residential Development

The Tribe proposes to develop residential plots on Parcels 2, 3, and 4 of the project site, supplementing the tribal housing on existing trust land (**Figure 4**). The proposed housing would consist of up to 143 five-acre residential plots with construction of single-family detached houses of varying sizes ranging from 3,000 to 5,000 square feet. The housing development would be phased over time as needed. Development on each five-acre plot would include approximately 0.35 acre of disturbance for building pad development, driveway construction, utility installations, and landscaping. As discussed above, new domestic water connections, improved access roads, driveways, a new WWTP, and utilities would also be constructed to support the residences.

SOURCE: Streetmap World, 2011; AES, 2013

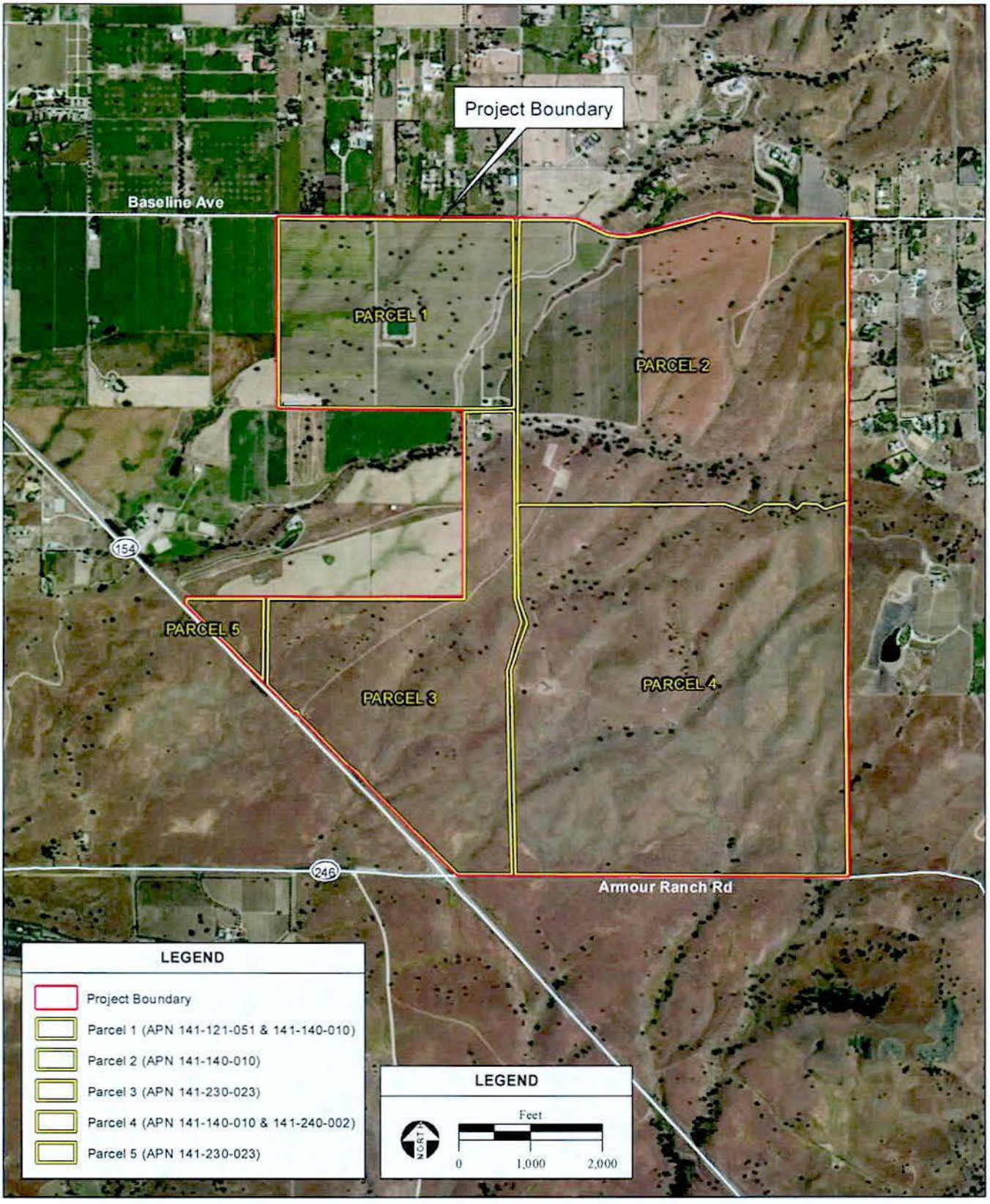
Santa Ynez Camp 4 BA / 201551 ■

Figure 1
Regional Location



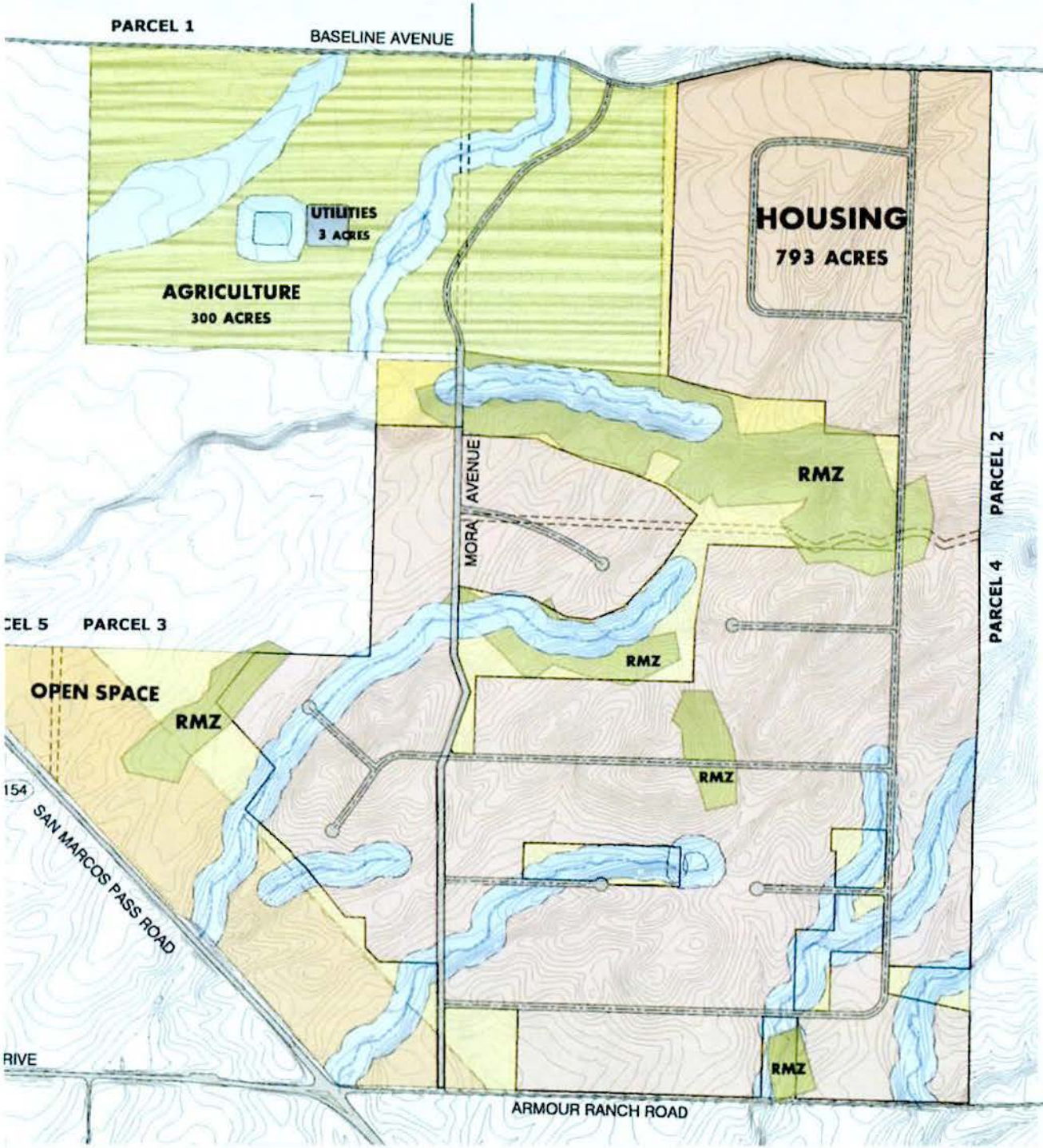
SOURCE: "Los Olivos, CA" & "Santa Ynez" USGS 7.5 Minute Topographic Quadranges, T7N, R 31W & T6N, R29W, Unsectioned Area of Santa Ynez Valley, Mt. Diablo Baseline & Meridian; Santa Barbara County GIS Data, 2012; AES, 2013

Figure 2
Site and Vicinity



SOURCE: Santa Barbara County GIS Data, 2012; Santa Ynez Band of Chumash Indians, 2011; NAIP Aerial Photograph, 6/17/2009; AES, 2013

Figure 3
Aerial Photograph



LAND USE SUMMARY

143 - 5 ACRE LOTS

DEVELOPABLE LAND	1,302 ACRES
RESIDENTIAL PRD	793 ACRES
AGRICULTURAL	300 ACRES
OPEN SPACE/RECREATION - GENERAL/TRAILS	206 ACRES
SPECIAL PURPOSE ZONE - GOVERNMENT	00 ACRES
SPECIAL PURPOSE ZONE - UTILITIES	3 ACRES

NON-DEVELOPABLE LAND	131 ACRES
RESOURCE MANAGEMENT ZONE - OAK WOODLAND	33 ACRES
RESOURCE MANAGEMENT ZONE - RIPARIAN CORRIDORS	98 ACRES

TOTAL SITE ACREAGE 1,433 ACRES

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Designated Tribal Land Uses

In addition to the proposed residential development, the Tribe would designate the following land uses on the subject project site.

The Tribe would continue operating an existing 256-acre vineyard located on Parcel 1 and a portion of Parcel 2 (**Figure 4**). An additional 44 acres would be designated for agricultural use on Parcel 2 to allow for expansion of the existing vineyard operation. The vineyard is currently in operation and includes a storage reservoir, existing access roadways, and a processing/shipping area.

Approximately 206 acres of the project site would be designated as open space and recreation. Passive trails would be designated for pedestrian use and equestrian trails would be developed to provide recreation for residents and guests in coordination with the horse stables located on the existing agricultural lands. The open space areas will be utilized for runoff control and will include the development of detention basins and vegetated swales. The open space/recreational area adjacent to SR 154 would be utilized as a viewshed protection zone; no residential development is planned within the zone to protect the viewshed of the scenic highway.

In accordance with the Tribe's commitment to conservation, 98 acres of land surrounding drainage corridors would be protected from development and, where necessary, enhanced in accordance with tribal ordinances. These corridors would be protected/enhanced to ensure adequate stormwater drainage is provided within the project site and to reduce the potential impact from development of the residential plots. These areas would be protected even where located on a specified residential plot. A qualified biologist would develop a Riparian Corridor Improvement Plan (Riparian Plan) for these areas. The Riparian Plan would provide for re-establishment of native vegetation in areas were invasive plant species have overwhelmed native vegetation.

In accordance with tribal ordinances, approximately 33 acres of oak woodland would be protected from development. Cutting, trimming, and pruning of the oak (*Quercus* sp.) trees within the oak woodland management zone would be monitored and controlled. Ground disturbance would be limited within the dripline of any oak tree within the zone.

Water Supply

The Proposed Project would result in an increased water demand of approximately 380 acre-feet per year (AFY). To meet increased demands, the Tribe would develop an on-site water supply system using groundwater. Two new groundwater wells with a target rated capacity of 750 gallons per minute (gpm) would be developed and located in reasonable proximity to the proposed residential developments in the center or southern portion of the project site. The Tribe would install an on-site domestic water storage tank as well as the appropriate water distribution pipelines to the proposed tribal residences. Water quality would be no less stringent than Federal Safe Drinking Water Act standards. Tertiary treated wastewater would be utilized to meet the irrigation water demands of the vineyard operation, common area landscaping, and other irrigated uses as feasible. The existing agriculture storage reservoir would be

repurposed as necessary, to be used to meet the recycled water storage requirements. The agricultural irrigation demands at the vineyard (approximately 265 AFY; increased to approximately 300 AFY at full build) would be met through mixing groundwater from the existing agricultural wells and recycled water from the WWTP as described below.

Wastewater Treatment and Disposal

A tertiary WWTP would be constructed on Parcel 1 adjacent to the existing reservoir within the vineyards (**Figure 4**). The WWTP would be sized to accommodate the proposed wastewater generation rates of the Proposed Project. The treated effluent would be disposed of via recycling for use as agricultural irrigation for the existing agricultural operations, common area landscaping, and other irrigated uses as feasible on the project site. Drainage control would be installed along the perimeter of recycled water irrigation areas to prevent comingling with stormwater runoff. Recycled water runoff would be collected and disposed of via discharge to the WWTP.

Wastewater facilities would include a tertiary WWTP, sewer lift stations, conveyance systems, emergency storage, runoff/spill control, and a recycled water reservoir. The sewer lift stations would be developed within the residential areas as needed. The existing water reservoir located on Parcel 1 would be repurposed to store recycled water from the WWTP and enlarged, if necessary. As discussed above, the recycled water would be used for irrigation. The existing water reservoir is currently lined and, prior to use as a recycled water reservoir, the lining would be inspected and repaired if necessary. The proposed wastewater treatment system would be operated pursuant to U.S. Environmental Protection Agency (EPA) regulations.

Roadways

Existing access roads would be improved and new roads constructed to provide access to the proposed residences and existing agricultural operations. The rural roadways would be 24 feet wide two-lane asphalt travel ways, with gravel shoulders that would be constructed using standards comparable to Santa Barbara County requirements. Signage would be provided for the new roadways. Crossing of potential Waters of the U.S. would be limited to the extent feasible; however, span bridges would be utilized where necessary. Access and egress from the project site would be provided from one existing easement onto Armour Ranch Road and two existing easements onto Baseline Avenue.

Grading and Drainage

Construction would involve grading and excavation for building pads and roadways. Cut and fill would be balanced to the extent feasible; however, some structural grade fill may be imported to meet engineering requirements. Stormwater runoff generated from development of the residential units and associated roadways would be conveyed by a combination of open channels, storm drains, and culverts. Runoff from the project site would be directed into vegetated swales, which would serve as energy dissipaters and filtering mechanisms for runoff generated on site prior to release into the on-site drainage

channels. Stormwater would be retained on site within detention basins prior to discharging off the subject project site at rates equivalent to pre-development conditions.

Construction Schedule

The project components would be constructed after the project site has been placed into federal trust for the Tribe. It is assumed that construction of the project would begin in 2014 and would be phased over approximately four to nine years as new tribal homes are needed.

3.2 PURPOSE AND NEED

The proposed conversion of 1,411.1 acres plus rights of way land into trust would enable the Tribe to provide housing for its existing tribal members and continue to provide housing for descendants as they come of age. The current Reservation lands are highly constrained due to a variety of physical, social, and economic factors. A majority of the lands held in Trust for the Tribe are located in a flood plain. This land is not suitable for much, if any, development because of flooding and drainage problems. The irregular topography and flood hazards are associated with the multiple creek corridors which run throughout the property resulting in severe limitations of efficient land utilization. The current Reservation has a residential capability of approximately 26 acres or 18% of the Reservation and an economic development capability of approximately 16 acres or 11% of the Reservation. The remaining 99 acres or 71% of the Reservation is creek corridor and sloped areas which are difficult to impossible to develop. Therefore, the size of the usable portion of the Santa Ynez Reservation amounts to approximately 50 acres, much of which has already been developed.

The Tribe has a population of 136 tribal members and approximately 1,300 lineal descendants which it must provide for. Currently, only about 17 percent of the tribal members and lineal descendants bave housing on tribal lands. All current land assignments on the existing Reservation shall continue to be maintained unchanged as it is difficult to cancel any existing land assignment on the Reservation. Article VIII of the Articles of Organization of the Tribe expressly states that only the General Council composed of all adult members of the Tribe over the age of 18 can veto or cancel an existing land assignment on the Reservation. This trust land acquisition is an integral part of the Tribe's efforts to bring tribal members and lineal descendants back to the Tribe, accommodate future generations, and create a meaningful opportunity for those tribal members and lineal descendants to be a part of a tribal community revitalization effort that rebuilds tribal culture, customs and traditions. In order to meet these goals, the Tribe needs additional trust land to provide housing for tribal members and lineal descendants who currently are not accommodated with tribal housing.

Based on these constraints, the Tribe is unable to provide adequate housing for its current members, and will be unable to provide housing for future tribal members on the existing Reservation, risking the Tribe's ability to provide for future generations and maintain its cultural foundations within its ancestral lands. The transfer to trust would thereby protect the Tribe's heritage and culture by ensuring existing and future generations are afforded the ability to live under tribal governance as a community within the

Tribe's ancestral and historic land holdings. Secondarily, the trust acquisition of the proposed trust land would also allow full tribal governance over its existing agricultural operations on the property; thereby allowing the Tribe to continue to build economic self sufficiency through diversified tribally-governed commercial enterprises. Under the Proposed Project, the tribal government would be able to fully exercise its sovereignty over its own future growth.

4.0 STUDY METHODS

For the purposes of this BA, the Action Area includes the location of any construction activity anticipated to occur within the project site.

4.1 PRELIMINARY DATA GATHERING AND RESEARCH

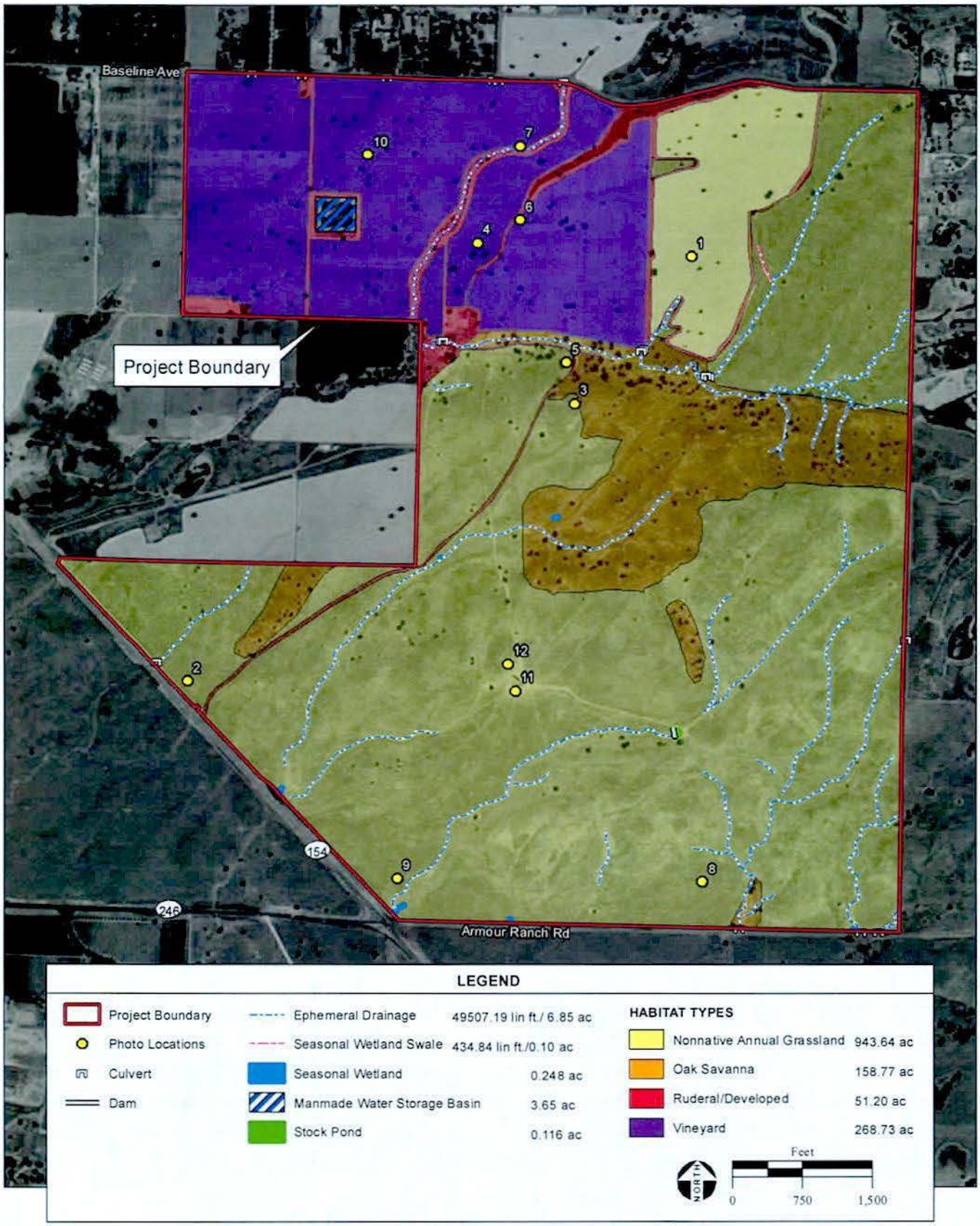
Prior to conducting the biological and focused botanical surveys, Analytical Environmental Services (AES) obtained biological information for the project site from the following sources: Santa Ynez and Los Olivos quads; color aerial photography of the project site; USFWS letter of listed and candidate species that may occur in the vicinity of the Proposed Project, Santa Barbara County, California (USFWS, 2011); California Native Plant Society (CNPS) Rare Plant Inventory of special status plants documented on the Los Olivos and Santa Ynez U.S. Geographical Survey (USGS) 7.5-minute topographic quadrangles (quad) (CNPS, 2013); California Natural Diversity Database (CNDDB) list of special status species documented on the Los Olivos and Santa Ynez quads (CDFG, 2013); and special status species documented within a five-mile radius of the project site (**Figure 5**). The USFWS, CNPS, and CNDDB lists are provided in **Attachment 1.**

Field Surveys and Analysis

AES senior biologist Kelly Bayne, M.S. and botanist Laura Burris conducted general biological surveys of the project site on September 12, 13, and 14, 2011 and focused botanical surveys on March 7, 8, and 9, 2012 and April 23, 24, and 25, 2012. The biological surveys consisted of walking and/or driving throughout the project site to characterize terrestrial and aquatic habitat types, conduct botanical inventories, and document potential habitat to support regionally occurring special status species.

Botanical inventories were conducted in accordance with the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFG, 2009). All visible plants and wildlife were noted and identified to the lowest possible taxon necessary to determine rarity and listing status. Lists of all plants and wildlife observed during the 2011 and 2012 surveys are provided in **Attachment 2.**

Global Positioning System (GPS) technology, a Trimble Geo XT™ receiver, was used to locate and map preliminary boundaries of waters of the U.S. during the 2011 and 2012 surveys. The geographic coordinate system used to reference the data was Universal Transverse Mercator (UTM–Zone 10), North American Datum (NAD83) in meters. Potential wetland boundaries were mapped at a level of accuracy of less than one meter. Habitat boundaries were identified during the September 12, 13, and 14, 2011



SOURCE: Santa Ynez Band of Chumash Indians, 2011; NAIP Aerial Photograph, 6/17/2009; AES, 2013

Figure 5
Habitat Map

biological surveys on an aerial photograph. Environmental Systems Research Institute (ESRI) shape files were generated based on the habitat boundaries, potentially jurisdictional waters of the U.S., and other sensitive biological resources mapped within the project site. Geographic analyses were performed using Geographic Information System (GIS) software (ArcView 3.3 GIS, ESRI, Inc.). The ESRI data and GIS software were used to calculate the acreages of habitat types and wetland features.

A list of regionally occurring federally listed species was compiled into a table based on the USFWS, CNDDB, and CNPS lists (**Attachment 3**). The potential for each of the species to occur on the project site was subsequently evaluated based on the results of the 2011 and 2012 surveys, review of applicable literature, and proximity of known occurrences of federally listed species within five miles of the project site. The table provides a list of the distributions, habitat types, and potential for each regionally occurring federally listed species to occur on the project site. Several regionally occurring federally listed species were determined to not have the potential to occur within the Project Site because either the project site lacks suitable habitat or the Project Site occurs outside of the known elevation range or geographical distribution. Federally listed species without the potential to occur within the project site are not discussed further.

5.0 HABITAT TYPES

Four terrestrial and five aquatic habitat types occur within the project site. The four terrestrial habitat types include: nonnative annual grassland, oak savanna, vineyard, and ruderal/disturbed areas. The five aquatic habitat types include: ephemeral drainage, seasonal wetland swale, seasonal wetland, manmade storage basin, and stock pond. A habitat map of the project site is shown in **Figure 6**. Photographs of the project site are included in **Figures 7a** and **7b**. A critical habitat map is provided in **Figure 8**. The impact area of the Proposed Project relative to habitat types is shown in **Figure 9**.

6.0 FEDERALLY LISTED SPECIES

6.1 FEDERALLY LISTED PLANTS

The project site does not provide habitat for any federally listed plants. No federally listed plants occur within the project site.

6.2 FEDERALLY LISTED WILDLIFE

Two federally listed wildlife species have the potential to occur within the project site: vernal pool fairy shrimp (*Branchinecta lynchi*; VPFS) and California red-legged frog (*Rana aurora draytonii*; CRLF). These species are discussed in detail below.

Vernal Pool Fairy Shrimp (Branchinecta lynchi; VPFS)
Federal Status: Threatened

PHOTO 1: View northwest of nonnative annual grassland. Photograph taken from the northeastern portion of the project site.

PHOTO 2: View north of nonnative annual grassland. Photograph taken from the western portion of the project site.

PHOTO 3: View north of oak savanna surrounded by nonnative annual grassland. Photograph taken from the central portion of the project site.

PHOTO 4: View northwest of vineyard. Photograph taken from the north-central portion of the project site.

PHOTO 5: View north of ruderal/disturbed areas. Photograph taken from the west-central portion of the project site.

PHOTO 6: View west of ruderal/disturbed areas and vineyard. Photograph taken from the north-central portion of the project site.

SOURCE: AES, 2013

Figure 6a
Site Photographs

PHOTO 7: View north of ruderal/disturbed areas and ephemeral drainage. Photograph taken from the northern portion of the project site.

PHOTO 8: View southeast of nonnative annual grassland, oak savanna, and ephemeral drainage. Photograph taken from the southwestern portion of the project site.

PHOTO 9: View southwest of vernal pool. Photograph taken from the southwestern portion of the project site.

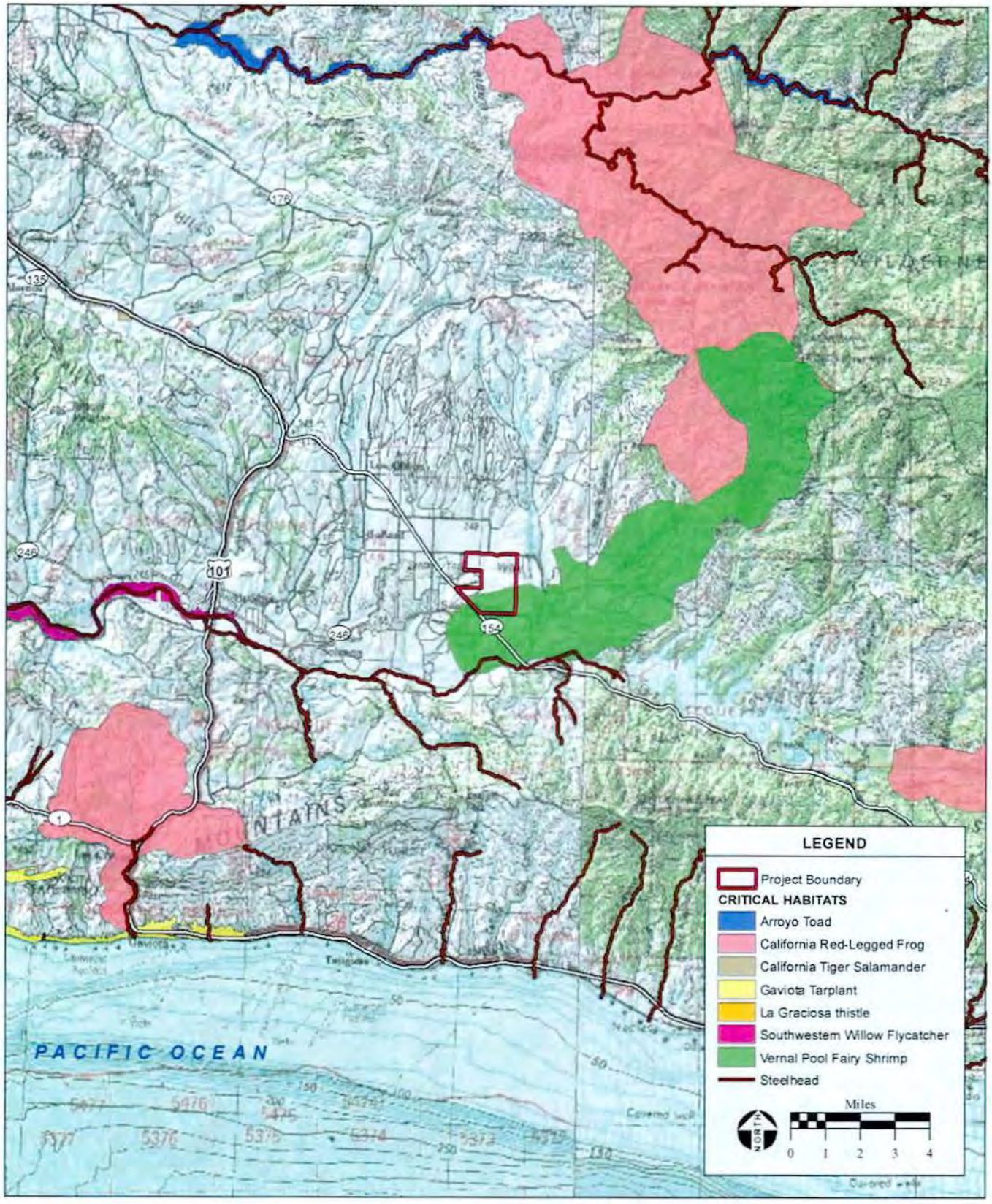
PHOTO 10: View west of manmade basin. Photograph taken from the northwestern portion of the project site.

PHOTO 11: View south of ephemeral drainage just south of levee. Photograph taken from the south-central portion of the project site.

PHOTO 12: View southeast of vernal pool that formed as a result of construction of the manmade levee. Photograph taken from the south-central portion of the project site.

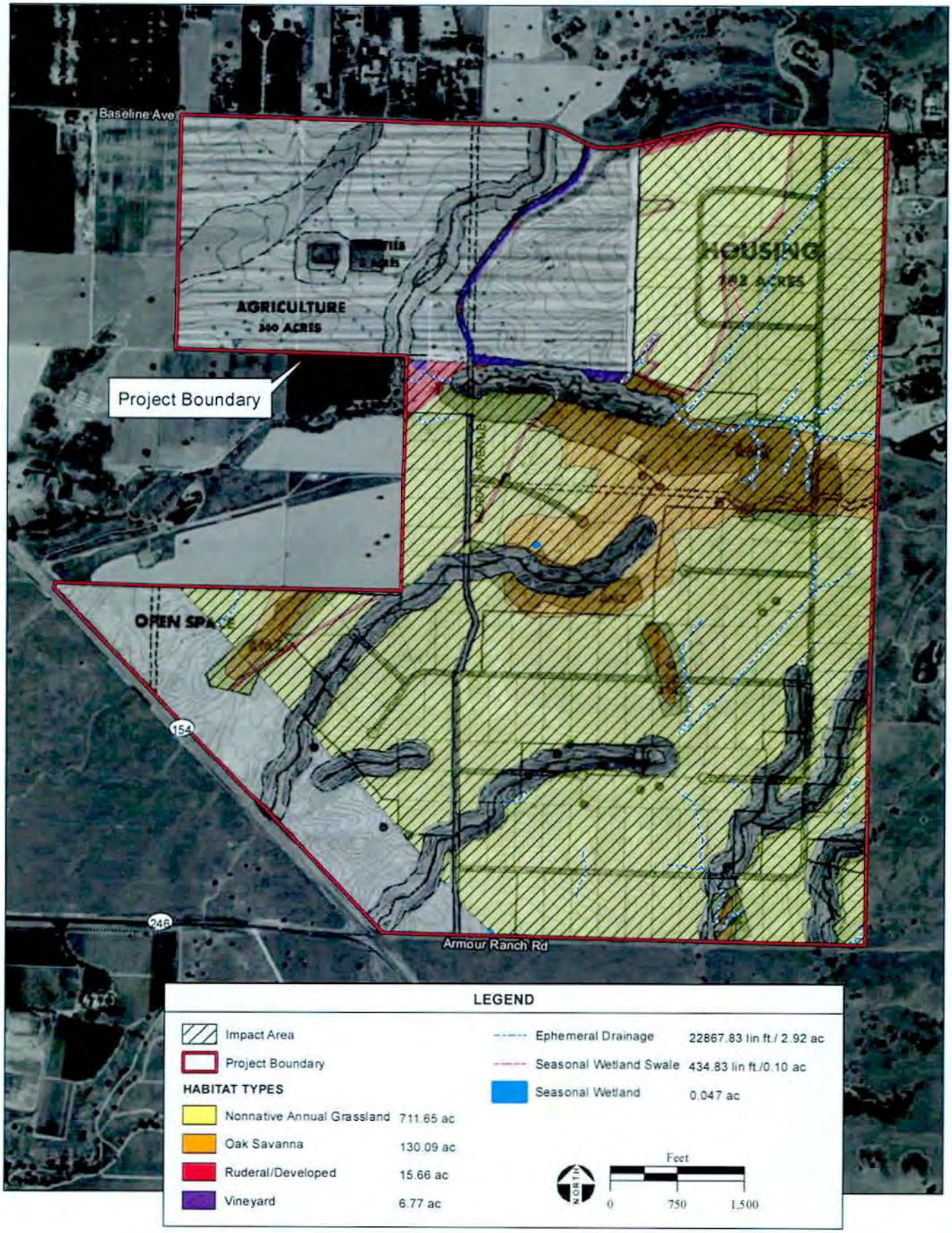
SOURCE: AES, 2013

Figure 6b
Site Photographs



SOURCE: "Santa Maria, CA" USGS 100k Topographic Quadrangle, San Bernadino Baseline and Meridian; USFWS Critical Habitats Surveys, 1977,1994,2002, and 2004-2006; AES, 2013

Figure 7
Critical Habitats



SOURCE: Santa Ynez Band of Chumash Indians, 2011; NAIP Aerial Photograph, 6/17/2009, AES, 2013

Figure 8
Habitat Impact Map

Biology: VPFS inhabit vernal pools of the Central Valley and Coast Ranges from 10 to 290 meters. VPFS are most commonly found in small swales, earth slumps, or basalt-flow depression basins with grassy or muddy bottoms in unplowed soils, and occasionally in clear depressions less than one meter in diameter in sandstone outcrops surrounded by foothill grasslands. VPFS occur in waters between 4.5 and 23°C, with low to moderate total dissolved solids (48 to 481 parts per million [ppm]), and a pH between 6.3 and 8.5 (Syrdahl, 1993; Eriksen and Belk, 1999). When the vernal pools fill with rainwater, VPFS hatch from eggs (shell-covered dormant embryos) present in the soil from previous years of breeding. Eggs normally hatch when water less than 10°C fills vernal pools. VPFS reach maturity in approximately 18 days under conditions when daytime temperatures reach 20°C, but 41 days are more typical if water remains near 15°C (Gallagher, 1996; Helm, 1998).

Regional Distribution: VPFS are known from Alameda, Butte, Calaveras, Colusa, Contra Costa, El Dorado, Fresno, Glenn, Kings, Madera, Merced, Monterey, Napa, Placer, Riverside, Sacramento, San Benito, San Joaquin, San Luis Obispo, Santa Barbara, Shasta, Solano, Stanislaus, Sutter, Tehama, Tulare, Tuolumne, Ventura, Yolo, and Yuba counties in California and in southern Oregon (NatureServe, 2011). There are no CNDDB records for VPFS within five miles of the project site. There is only one documented CNDDB record for VPFS within Santa Barbara County. The record is from 2004 and is mapped approximately 48.3 kilometers (30 miles) north of the project site (CNDDB occurrence number: 359). The record states that an estimated 10,000 VPFS adults were observed within a small swale comprised of rocky, clay soil surrounded by grazed blue oak/grassland.

Recovery Plan: VPFS is covered as a federally listed threatened species under the *Recovery Plan for Vernal Pool Ecosystems for California and Southern Oregon* (Vernal Pool Recovery Plan) (USFWS, 2005a). The USFWS published the Vernal Pool Recovery Plan on December 15, 2005. The Vernal Pool Recovery Plan covers 20 federally threatened or endangered species and 13 special status species that inhabit vernal pool ecosystems in California and southern Oregon. The southern portion of the project site occurs within the Santa Barbara Vernal Pool Region within the Lake Cachuma core area of the Vernal Pool Recovery Plan (USFWS, 2005a).

Potential to Occur in the Action Area: The project site provides habitat for VPFS within the seasonal wetlands and is located within a core area of the Vernal Pool Recovery Plan. The seasonal wetlands did not contain water during the September 2011, March 2012, and April 2012 biological surveys of the project site. Because of the factors above and that the no protocol level surveys for VPFS have been conducted, VPFS may occur within the project site.

Potential Impacts: The Proposed Project could impact seasonal wetlands located within a core area of the Vernal Pool Recovery Plan that provide habitat for VPFS. No indirect effects would occur to seasonal wetlands since no other seasonal wetlands with hydrological connectivity occur within 250 feet of the seasonal wetlands proposed to be impacted. The avoidance and minimization measures identified below would ensure that the Proposed Project **may affect but is not likely to adversely affect** VPFS.

Mitigation Measures: The following mitigation measures are required to avoid or minimize potential adverse affects to VPFS. Upon implementation of the mitigation measures identified below, potential impacts to VPFS would be reduced to a less-than-significant level.

- Prior to the final site determination of the residential units, utility corridors, roadways, and any other project component that would result in ground disturbance, a qualified biologist shall identify appropriate wetland habitat buffer zones around seasonal wetland habitat within the project site to assure avoidance during construction.
- Prior to construction within 500 feet of a wetland habitat buffer zone, a qualified biologist shall demarcate each buffer zone using appropriate materials such as high visibility construction fencing, which will not be removed until the completion of construction activities within 500 feet of the wetland habitat buffer zone.
- Staging areas shall be located away from the wetland habitat buffer zones. Temporary stockpiling of excavated or imported material shall occur only in approved construction staging areas.
- Prior to construction within 500 feet of a wetland buffer zone, a USFWS-approved biologist shall conduct a habitat sensitivity training related to VPFS for project contractors and personnel. Supporting materials containing training information shall be prepared and distributed. Upon completion of training, all construction personnel shall sign a form stating that they have attended the training and understand all the conservation measures. Training shall be conducted in languages other than English, as appropriate. Proof of this instruction will be kept on file with the Tribe. The Tribe will provide the USFWS with a copy of the training materials and copies of the signed forms by project staff indicating that training has been completed within 30 days of the completion of the first training session. Copies of signed forms will be submitted monthly as additional training occurs for new employees. The crew foreman will be responsible for ensuring that construction personnel adhere to the guidelines and restrictions. If new construction personnel are hired following the habitat sensitivity training, the crew foreman will ensure that the personnel receive the mandatory training before starting work.

California Red-Legged Frog (Rana aurora draytonii; CRLF)
Federal Status: Threatened

Biology: CRLF require aquatic breeding areas embedded within a matrix of riparian and upland dispersal habitats from sea level to approximately 1,500 meters (75 FR 12816-12959). Breeding aquatic habitats include pools and backwaters within streams, creeks, ponds, marshes, springs, sag ponds, dune ponds, and lagoons. CRLF also breed in artificial impoundments including stock ponds. The breeding period is from November through April. CRLF mate between February and March. The eggs hatch into tadpoles in approximately three weeks. The tadpoles subsequently metamorphose into juveniles between 11 and 20 weeks, which generally occurs between June and September. CRLF use a variety of areas, including aquatic, riparian, and upland habitats. CRLF require a breeding pond, slow-flowing stream reach, or deep pool within a stream with vegetation or other material to which egg masses may be attached. These areas must hold water long enough for tadpoles to complete their metamorphosis into juvenile frogs that

can survive outside of water. The CRLF use riparian and upland habitats for foraging, shelter, cover, and dispersal movement (75 FR 12816-12959). Upland habitats include crevices under boulders or rocks and organic debris, such as downed trees or logs; industrial debris; and agricultural features, such as drains, watering troughs, abandoned sheds, or hay-ricks. Beginning with the first rains of fall, CRLF may make overland excursions through upland habitats during the night. CRLF may move distances up to 1.6 kilometers (one mile) throughout one wet season (USFWS, 2002).

Regional Distribution: CRLF are known from Alameda, Butte, Contra Costa, El Dorado, Fresno, Kern, Los Angeles, Marin, Mariposa, Mendocino, Merced, Monterey, Napa, San Benito, San Bernardino, San Diego, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Siskiyou, Solano, Sonoma, Stanislaus, Tehama, Trinity, Tuolumne, and Ventura counties (NatureServe, 2011). There are two CNDDB records for CRLF within five miles of the project site. The nearest CNDDB record is from 2003 and is approximately 1.13 kilometers (0.7 miles) south of the project site (occurrence number: 769). The record states that one juvenile CRLF was observed within a narrow riparian corridor within a tributary to the Santa Ynez River below a six-foot high impassible waterfall. The other CNDDB record is from 2002 and is approximately 6.12 kilometers (3.8 miles) southwest of the project site (occurrence number: 665). The record states that eight CRLF adults and 27 juveniles were observed on a bank within a small pool within Quiota Creek (CDFG, 2003).

Recovery Plan: The USFWS published the *Recovery Plan for the California Red-legged Frog (Rana aurora draytonii)* (CRLF Recovery Plan) on May 28, 2002 (USFWS, 2002). The objective of the CRLF Recovery Plan is to reduce any threats to the species and to improve the status of the CRLF populations sufficiently to warrant delisting. The CRLF Recovery Plan designated eight recovery unit boundaries throughout California and 35 Core Areas within the unit boundaries. Recovery units are "regions of the species' distribution that are distinct from one another based on ecological characteristics, status of the species, threats to the continued existence of the species, or recovery actions needed within the area." Core Areas are "watersheds, or portions thereof, that have been determined to be essential to the recovery of the CRLF." Core Areas have no legal mandate for protection under FESA and solely rely upon voluntary implementation (USFWS, 2002). The project site does not occur within any of the recovery unit boundaries for CRLF.

Potential to Occur in the Action Area: The project site does not provide breeding habitat for CRLF as the manmade water storage basin is concrete lined and lacks vegetation and the ephemeral drainages do not hold permanent water long enough for CRLF larvae to develop into adults (USFWS, 2013). Aquatic features, including manmade ponds that that appear to hold water for the majority of the year, occur to the east and west of the project site, which may provide habitat for CRLF (**Figure 3**). Six of these wetland features occur within 1.6 kilometers (one mile) to the west of the project site and five wetland features within 1.6 kilometers (one mile) to the east of the project site. Because these features occur on private land, they were not ground-truthed during the September 2011, March 2012, and April 2012 surveys. Therefore, it is uncertain whether these features lack barriers between the wetland features and potential upland habitat within the project site and/or whether the wetland features are comprised of

emergent vegetation required for CRLF to breed. CRLF has the potential to utilize upland habitat within the project site.

Potential Impacts: The project site does not provide breeding habitat for CRLF. The Proposed Project would have no effect on CRLF breeding habitat because none exists within the proposed action area. The project site provides upland habitat within all land located within 1.6 kilometers of wetland features occurring outside of the eastern and western boundaries of the proposed action area. The Proposed Project could impact CRLF should it be determined that CRLF occupy the wetland features occurring outside of the project site. The avoidance and minimization measures identified below would ensure that the Proposed Project **may affect but is not likely to adversely affect** CRLF.

Mitigation Measures: The following mitigation measures are required to avoid or minimize potential adverse affects to CRLF. Upon implementation of the mitigation measures identified below, potential impacts to CRLF would be reduced to a less-than-significant level.

- A qualified biologist shall conduct a habitat sensitivity training related to CRLF for project contractors and personnel, as identified under the mitigation measures for VPFS.
- A qualified biologist shall conduct a preconstruction survey within 14 days prior to the onset of construction activities occurring within 1.6 kilometers of potential breeding habitat.
- A qualified biologist shall monitor construction activities during initial grading activities within the project site. Should a CRLF be detected within the construction footprint, grading activities shall halt and the USFWS shall be consulted. No grading activities shall commence until the biologist determines that the CRLF has vacated the construction footprint on its own accord and the USFWS authorizes the re-initiation of grading activities.

7.0 CRITICAL HABITAT

7.1 VERNAL POOL FAIRY SHRIMP (*BRANCHINECTA LYNCHI*; VPFS)

The USFWS designated critical habitat for 15 vernal pool species on August 11, 2005 (50 CFR 17) (USFWS, 2005a). The primary constituent elements of critical habitat for VPFS are the habitat components that provide: topographic features characterized by mounds and swales and depressions within a matrix of surrounding uplands that result in complexes of continuously, or intermittently, flowing surface water in the swales connecting the pools, providing for dispersal and promoting hydroperiods of adequate length in the pools; depressional features including isolated vernal pools with underlying restrictive soil layers that become inundated during winter rains and that continuously hold water for a minimum of 18 days, in all but the driest years; thereby providing adequate water for incubation, maturation, and reproduction; sources of food, expected to be detritus occurring in the pools, contributed by overland flow from the pools' watershed, or the results of biological processes within the pools themselves, such as single-celled bacteria, algae, and dead organic matter, to provide for feeding; and pool structure consisting of organic and inorganic materials, such as living and dead plants from plant species adapted to seasonally inundated environments, rocks, and other inorganic debris that may be washed, blown, or otherwise transported into the pools, that provide shelter. The USFWS (2011) list

identifies VPFS as having critical habitat within the vicinity of the Proposed Project. The southern portion of the project site occurs within Critical Habitat Unit 31 (**Figure 8**).

No adverse modification would occur to the 330.11 acres of critical habitat for VPFS as a result of the Proposed Action. The Proposed Project will avoid removal of potential habitat in the seasonal wetlands within the action area. The Proposed Action is **not likely to adversely affect** critical habitat for VPFS because of the limited size and the avoidance measures that would be implemented for the species.

7.2 CALIFORNIA RED-LEGGED FROG (*RANA AURORA DRAYTONII*; CRLF)

The USFWS revised the critical habitat designated for CRLF on March 17, 2010 (USFWS, 2010; 75 FR 12816-12959). The USFWS designated approximately 1,636,609 acres of critical habitat within 48 units of 27 counties in California. The project site does not occur within critical habitat for CRLF. The nearest critical habitat units in the vicinity of the project site include SBT-3 and SBT-6. SBT-3 occurs approximately 8.88 kilometers (5.6 miles) northeast of the project site. SBT-6 occurs approximately 8.1 kilometers (5.5) miles south of the project site. The Proposed Project would have no effect on critical habitat for CRLF because none occurs within the project site.

8.0 INTERRELATED AND INTERDEPENDENT EFFECTS

Interrelated and interdependent effects are direct or indirect effects that occur as a result of activities that are closely affiliated with a project. The development of the Proposed Project is an interrelated and interdependent activity to the proposed federal actions. The Proposed Project would not be developed but for the transfer of land into trust. No additional interrelated and interdependent effects would occur as a result of the Proposed Action.

9.0 CUMULATIVE EFFECTS

For the purposes of this BA, cumulative effects are defined as the effects of future state, local, or private activities that are reasonably foreseeable in the Action Area. This BA only discusses future state, local, or private activities occurring outside the Action Area if they result in effects within the Action Area. Future federal actions that are unrelated to the Proposed Project are not considered in this BA because they will be subject to separate consultation pursuant to Section 7 of FESA. No cumulative projects are anticipated to occur in the vicinity of the Action Area. Any future development in the area would be required to mitigate impacts to biological resources based on the California Environmental Quality Act (CEQA), the California Endangered Species Act, the federal Clean Water Act, and the FESA. No significant cumulative effects would occur.

10.0 CONCLUSIONS AND DETERMINATION

The Proposed Project could impact 0.15 acres of seasonal wetlands located within a core area of the Vernal Pool Recovery Plan that provide habitat for VPFS. The avoidance measures including establishment of appropriate buffer zones by a qualified biologist, environmental awareness training, and monitoring grading activities within 500 feet of wetland features located within the project site would ensure that the Proposed Action **is not likely to adversely affect** VPFS.

The Proposed Project would have no effect on CRLF breeding habitat because none exists within the proposed action area. The Proposed Project could impact upland habitat for CRLF should it be determined that CRLF occupy the wetland features occurring outside of the project site. The avoidance and minimization measures including conducting preconstruction surveys and environmental awareness training and monitoring grading activities within 1.6 kilometers of the wetland features located outside of the project site would ensure that the Proposed Action **is not likely to adversely affect** CRLF.

11.0 REFERENCES

Analytical Environmental Services (AES). 2012. Draft Environmental Assessment for the Chumash Camp 4 Fee-To-Trust.

California Department of Fish and Game (CDFG), 2003. RareFind 3 Version 3.1.0, California Natural Diversity Data Base. Natural Heritage Division, CNDDB, Sacramento, California. Updated on March 2, 2012. Accessed on March 19, 2012.

California Department of Fish and Game (CDFG), 2009. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. State of California. California Natural Resources Agency, Department of Fish and Game. November 24, 2009.

CaliforniaHerps.com, 2012. Information About California Frogs, Snakes, Lizards, Turtles and Salamanders. Available at: www.californiaherps.com. Accessed on February 3, 2012.

California Native Plant Society (CNPS), 2012. Inventory of Rare and Endangered Plants" (online edition). Native Plant Society. Sacramento, California. Available at: http://www.northcoastcnps.org/cgi-bin/inv/inventory.cgi. Accessed February 3, 2012.

Eriksen, C. and D. Belk, 1999. Fairy Shrimps of California's Puddles, Pools, and Playas. Mad River Press, Inc. Eureka, California.

Gallagher, S.P., 1996. Seasonal Occurrence and Habitat Characteristics of Some Vernal Pool Branchiopoda in Northern California. J. Crustac. Biol. 16.

Helm, B.P., 1998. Biogeography of Eight Large Branchiopods Endemic to California. Pages 124-139 in C.W. Witham, E.T. Bauder, D. Belk, W.R. Ferren, Jr. and R. Ornduff (eds.) Ecology, Conservation, and Management of Vernal Pool Ecosystems- Proceedings from a 1996 Conference. California Native Plant Society, Sacramento, California.

Moyle, P.B., 2002. Inland Fishes of California. Revised and Expanded Edition. University of California Press, Berkley, California.

NatureServe, 2011. NatureServe Explorer: An Online Encyclopedia of Life [Web Application]. (Last updated: July 2011) Version 7.1. NatureServe, Arlington, Virginia. Available at: http://www.natureserve.org/explorer. Accessed February 3, 2012.

Stebbins, R.C., 2003. A Field Guide to Western Reptiles and Amphibians, 3rd ed. Houghton Mifflin, Boston, Massachusetts.

Syrdahl, R.L., 1993. Distribution Patterns of Some Key Macroinvertebrates in a Series of Vernal Pools at Vina Plains Preserve, Tehama County, California. M.S. Thesis, California State University, Chico, California.

U.S. Fish and Wildlife Service (USFWS), 2002. Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*). U.S. Fish and Wildlife Service, Portland, Oregon. viii + 173 pp.

U.S. Fish and Wildlife Service (USFWS), 2005a. Endangered and Threatened Wildlife and Plants; Final Designation of Critical Habitat for Four Vernal Pool Crustaceans and Eleven Vernal Pool Plants in California and Southern Oregon; Evaluation of Economic Exclusions From August 2003 Final Designation. U.S. Department of the Interior, Fish and Wildlife Service. 50 CFR Part 17. RIN 1018–AU06. pp. 46924-46999.

U.S. Fish and Wildlife Service (USFWS), 2005b. Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon. Portland, Oregon. Available at: http://Fresno.fws.gov/es/spp_lists/auto_list_form.cfm. Accessed on March 20, 2009.

U.S. Fish and Wildlife Service (USFWS), 2010. Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the California Red-Legged Frog (Fish and Wildlife Service) 50 CFR Part 17. Department of the Interior. Fish and Wildlife Service. March 17, 2010. 75 FR 12816-12959.

ATTACHMENT 1

USFWS, CNDDB, AND CNPS LISTS

United States Department of the Interior

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

IN REPLY REFER TO:
08EVEN00-2012-SLI-0005

November 16, 2011

Kelly Bayne
1801 7th Street, Suite 100
Sacramento, California 95811

Subject: Species List Request for the SYI-Camp 4 Project, Santa Barbara County, California

Dear Mr. Phillips:

This letter responds to your request, dated October 6, 2011, and received in our office via IPaC the same day, for a list of endangered, threatened, proposed, or candidate species that may occur in the vicinity of the SYI-Camp 4 project, Santa Barbara County, California. The project is for an unspecified development project located at 34.624387° N latitude 120.051079° W longitude.

The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibit the taking of any federally listed endangered or threatened species. Section 3(19) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species.

Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways. If the subject project is to be funded, authorized, or carried out by a Federal agency and may affect a listed species, the Federal agency must consult with the Service, pursuant to section 7(a)(2) of the Act. If a proposed project does not involve a Federal agency but may result in the take of a listed animal species, the project proponent should apply for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. Once you have determined if the proposed project will have a lead Federal agency, we can provide you with more detailed information regarding the section 7 or 10(a)(1)(B) permitting process.

LISTED AND CANDIDATE SPECIES
THAT MAY OCCUR IN THE VICINITY OF
THE PROPOSED PROJECT, SANTA BARBARA COUNTY, CALIFORNIA

Birds		
Least Bell's vireo	*Vireo bellii pusillus*	E
Amphibians		
California red-legged frog	*Rana draytonii*	T
California tiger salamander	*Ambystoma californiense*	E
Invertebrates		
Vernal pool fairy shrimp	*Branchinecta lynchi*	T, CH
Plants		
Gambel's watercress	*Rorippa gambellii*	E
Marsh sandwort	*Arenaria paludicola*	E

Key:
E - Endangered T - Threatened CH - Critical habitat

	Scientific Name/Common Name	Element Code	Federal Status	State Status	GRank	SRank	CDFG or CNPS
1	***Accipiter cooperii*** Cooper's hawk	ABNKC12040			G5	S3	
2	***Agelaius tricolor*** tricolored blackbird	ABPBXB0020			G2G3	S2	SC
3	***Agrostis hooveri*** Hoover's bent grass	PMPOA040M0			G2	S2.2	1B.2
4	***Anniella pulchra pulchra*** silvery legless lizard	ARACC01012			G3G4T3T4Q	S3	SC
5	***Arctostaphylos refugioensis*** Refugio manzanita	PDERI041B0			G2	S2?	1B.2
6	***Atriplex serenana var. davidsonii*** Davidson's saltscale	PDCHE041T1			G5T2?	S2?	1B.2
7	***California macrophylla*** round-leaved filaree	PDGER01070			G2	S2	1B.1
8	***Calochortus fimbriatus*** late-flowered mariposa-lily	PMLIL0D1J2			G3G4	S2.2	1B.2
9	***Cordylanthus rigidus ssp. littoralis*** seaside bird's-beak	PDSCR0J0P2		Endangered	G5T1	S1.1	1B.1
10	***Delphinium umbraculorum*** umbrella larkspur	PDRAN0B1W0			G2G3	S2S3.3	1B.3
11	***Emys marmorata*** western pond turtle	ARAAD02030			G3G4	S3	SC
12	***Lasthenia glabrata ssp. coulteri*** Coulter's goldfields	PDAST5L0A1			G4T3	S2.1	1B.1
13	***Lonicera subspicata var. subspicata*** Santa Barbara honeysuckle	PDCPR030R3			G5T2	S2.2	1B.2
14	***Oncorhynchus mykiss irideus*** southern steelhead - southern California DPS	AFCHA0209J	Endangered		G5T2Q	S2	SC
15	***Rana draytonii*** California red-legged frog	AAABH01022	Threatened		G4T2T3	S2S3	SC
16	***Senecio aphanactis*** chaparral ragwort	PDAST8H060			G3?	S1.2	2.2
17	***Southern California Steelhead Stream***	CARE2310CA			G?	SNR	
18	***Southern Coast Live Oak Riparian Forest***	CTT61310CA			G4	S4	
19	***Southern Cottonwood Willow Riparian Forest***	CTT61330CA			G3	S3.2	
20	***Southern Vernal Pool***	CTT44300CA			G?	SNR	
21	***Southern Willow Scrub***	CTT63320CA			G3	S2.1	
22	***Thamnophis hammondii*** two-striped garter snake	ARADB36160			G3	S2	SC
23	***Thelypteris puberula var. sonorensis*** Sonoran maiden fern	PPTHE05192			G5T3	S2.2?	2.2
24	***Thermopsis macrophylla*** Santa Ynez false lupine	PDFAB3Z0E0		Rare	G1	S1.3	1B.3

CNPS Inventory of Rare and Endangered Plants

Status: Plant Press Manager window with 13 items - Mon, Mar. 19, 2012 15:35 c

- During each visit, we provide you with an empty "Plant Press" for collecting items of interest.
- Several report formats are available. Use the CSV and XML options to download raw data.

Reformat list as: Standard List - with Plant Press controls

DELETE unchecked items | check all | check none

open	save	scientific	common	family	CNPS
	☑	Agrostis hooveri	Hoover's bent grass	Poaceae	List 1B.2
	☑	Arctostaphylos refugioensis	Refugio manzanita	Ericaceae	List 1B.2
	☑	California macrophylla	round-leaved filaree	Geraniaceae	List 1B.1
	☑	Calochortus fimbriatus	late-flowered mariposa lily	Liliaceae	List 1B.2
	☑	Caulanthus amplexicaulis var. barbarae	Santa Barbara jewel-flower	Brassicaceae	List 1B.1
	☑	Cordylanthus rigidus ssp. littoralis	seaside bird's-beak	Orobanchaceae	List 1B.1
	☑	Delphinium umbraculorum	umbrella larkspur	Ranunculaceae	List 1B.3
	☑	Fritillaria ojaiensis	Ojai fritillary	Liliaceae	List 1B.2
	☑	Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	List 1B.1
	☑	Lonicera subspicata var. subspicata	Santa Barbara honeysuckle	Caprifoliaceae	List 1B.2
	☑	Ribes amarum var. hoffmannii	Hoffmann's bitter gooseberry	Grossulariaceae	List 3
	☑	Senecio aphanactis	chaparral ragwort	Asteraceae	List 2.2
	☑	Thermopsis macrophylla	Santa Ynez false lupine	Fabaceae	List 1B.3

DELETE unchecked items | check all | check none

ATTACHMENT 2

PLANTS AND WILDLIFE OBSERVED

Plants and Wildlife Observed within the Project Site.

Plants observed.

Family	Scientific Name	Common Name
Agavaceae	*Chlorogalum pomeridianum* var. *pomeridianum*	Soaproot
Amaranthaceae	*Amaranthus retroflexus*	Pigweed
Apiaceae	*Lomatium* spp.	
Asclepiadaceae	*Asclepias californica*	California milkweed
	Asclepias fasicularis	Narrow-leaf milkweed
Asteraceae	*Acherachaena mollis*	Blow-wives
	Baccharis pilularis	Coyote bush
	Calendula arvensis	Field marigold
	Carduus pycnocephalus	Italian thistle
	Centaurea melitensis	Tocalote
	Centaurea solstitialis	Yellow star-thistle
	Conyza canadensis	Horseweed
	Lasthenia gracilis	Goldfields
	Layia platyglossa	Tidy-tips
	Matricaria discoidea	Pineapple weed
	Silybum murianum	Milk thistle
	Sonchus oleraceus	Prickly lettuce
	Taraxicum officianale	Dandelion
	Amsinckia menziesii	Common fiddleneck
Boraginaceae	*Plagiobothrys nothofulvus*	Popcorn flower
	Plagiobothrys stipitatus var. *micranthus*	Popcorn flower
Brassicaceae	*Brassica nigra*	Wild mustard
	Capsella bursa-pastoris	Shepherds purse
	Hirschfeldia incana	Short pod mustard
	Lepidium nitidum var. *nitidum*	Peppergrass
	Raphanus sativus	Wild radish
Cactaceae	*Opuntia* sp.	Prickly pear cactus
Chenopodaceae	*Atriplex triangularis*	Spearscale
Convolvulaceae	*Convolvulus arvensis*	Field bindweed
Cyperaceae	*Cyperus eragrostis*	Nutsedge
	Eleocharis macrostachya	Creeping spike-rush
Euphorbiaceae	*Croton setigerus*	Doveweed
Fabaceae	*Acmispon wrangelianus*	Foothill lotus
	Lupinus bicolor	Bicolor lupine
	Medicago polymorpha	Bur clover
	Trifolium depauperatum var. *amplectens*	Clover
	Vicia sativa	Spring vetch
Fagaceae	*Quercus lobata*	Valley oak
	Quercus agrifolia	Coast live oak
Geraneaceae	*Erodium cicutarium*	Filaree
	Geranium dissecta	Cutleaf geranium
Lamiaceae	*Lamium amplexicaule*	Henbit

	Mentha arvensis	Field mint
	Mentha pulegium	Pennyroyal
	Trichostema lanceolatum	Vinegar weed
Lythraceae	*Lythrum hyssopifolium*	Hyssop loosestrife
Malvaceae	*Malva parviflora*	Cheeseweed
	Sidalcea sp.	Checkerbloom
Montiaceae	*Calandrinia ciliate*	Red maids
Onagraceae	*Epilobium ciliatum*	Willow herb
Papaveraceae	*Eschscholzia californica*	California poppy
Plantaginaceae	*Plantago erecta*	California plantain
	Plantago lanceoleta	English plantain
Poaceae	*Avena fatua*	Wild oat
	Bromus diandrus	Ripgut brome
	Bromus hordeaceus	Soft chess
	Crypsis alopecuroides	Prickle grass
	Cynodon dactylon	Bermuda grass
	Echinochloa crus-gali	Barnyard grass
	Hordeum murinum	Foxtail barley
	Lolium multiflorum	Italian rye grass
	Poa pratensis	Kentucky bluegrass
	Stipa pulchra	Purple needlegrass
	Vulpia myuros	Zorro fescue
Polemoniaceae	*Navarretia squarrosa*	Skunkweed
Polygonaceae	*Polygonum arenastrum*	Common knotweed
	Polygonum californicum	California knotweed
	Rumex crispus	Curly dock
Ranunculaceae	*Ranunculus californicus* var. *californicus*	California buttercup
Rubiaceae	*Galium aparine*	
Salicaceae	*Populus femontii*	Fremont's cottonwood
Solanaceae	*Datura discolor*	Jimsonweed
	Solanum nigra	Nightshade
Themidaceae	*Dichelostemma capitatum ssp. capitatum*	Bluedicks
	Muilla maritime	Common muilla
Violaceae	*Viola pedunculata*	Johnny-jump-up
Vitaceae	*Vitis vinifera* var.	Wine grape varietal
Zygophyllaceae	*Tibulus terrestris*	Puncture vine

Wildlife observed.

Family	Scientific Name	Common Name
Mammals		
Bovidae	*Bos taurus*	Domestic cow
Canidae	*Canis latrans*	Coyote
Equidae	*Equus caballus*	Domestic horse
Leporidae	*Lepus californicus*	Black-tailed jackrabbit
Sciuridae	*Spermophilus beecheyi*	California ground squirrel
Reptiles		
Phrynosomatidae	*Sceloporus occidentalis*	Western fence lizard
Birds		
Accipitridae	*Buteo jamaicensis*	Red-tailed hawk
Accipitridae	*Buteo lineatus*	Red-shouldered hawk

Cathartidae	*Cathartes aura*	Turkey vulture
Columbidae	*Zenaida macroura*	Mourning dove
Corvidae	*Corvus brachyrhynchos*	American crow
	Corvus corax	Common raven
Cucilidae	*Geococcyx californianus*	Greater roadrunner
Falconidae	*Falco sparverius*	American kestrel
Hirundinidae	*Hirundo rustica*	Barn swallow
Icteridae	*Agelaius phoeniceus*	Red-winged blackbird
	Molothrus ater	Brown-headed cowbird
	Sturnella neglecta	Western meadowlark
Mimidae	*Mimus polyglottos*	Northern mockingbird
Parulidae	*Setophaga coronata*	Yellow-rumped warbler
Picidae	*Melanerpes formicivorus*	Acorn woodpecker
Turdidae	*Sialia mexicana*	Western bluebird

ATTACHMENT 3

REGIONALLY OCCURRING FEDERALLY LISTED SPECIES

TABLE 1
Regionally Occurring Federally Listed Species

SCIENTIFIC NAME COMMON NAME	FEDERAL STATUS	DISTRIBUTION	HABITAT REQUIREMENTS	PERIOD OF IDENTIFICATION	POTENTIAL TO OCCUR ONSITE
Plants					
Arenaria paludicola Marsh sandwort	Endangered	Known from Los Angeles, San Bernardino, Santa Cruz, San Francisco, and San Luis Obispo counties in California and in Washington (CNPS, 2012).	Stoloniferous shrub usually found on sandy openings in marshes and swamps, which are occasionally freshwater or brackish, from 3 to 170 meters (CNPS, 2012).	May-August	No. The project site does not provide habitat for this species.
Nasturtium (=Rorippa) gambellii Gambel's watercress	Endangered	Known from Los Angeles, Orange, Santa Barbara, San Bernardino, San Diego, and San Luis Obispo counties and from Baja California (CNPS, 2012).	Rhizomatous herb occasionally found in brackish or freshwater meadows and swamps from 5 to 330 meters (CNPS, 2012).	April-October	No. The project site does not provide habitat for this species.
Wildlife					
Invertebrates					
Branchinecta lynchi Vernal pool fairy shrimp	Threatened, Critical Habitat	Known from Alameda, Butte, Calaveras, Colusa, Contra Costa, El Dorado, Fresno, Glenn, Kings, Madera, Merced, Monterey, Napa, Placer, Riverside, Sacramento, San Benito, San Joaquin, San Luis Obispo, Santa Barbara, Shasta, Solano, Stanislaus, Sutter, Tehama, Tulare, Tuolumne, Ventura, Yolo, and Yuba counties in California and in southern Oregon (NatureServe, 2011).	Found commonly in a small swale earth slump or basalt-flow depression basin with grassy or muddy bottoms in unplowed grassland from 10 to 290 meters in the Central Valley and up to 1,159 meters in the South Coast Mountains Region (Eriksen and Belk, 1999).	Wet season: December-May (adults) Dry season: June-November (cysts)	Yes. See text.
Fish					
Oncorhynchus mykiss irideus Southern steelhead	Endangered	Known from Santa Maria River south to the southern extent of San Mateo Creek in San Diego County (Moyle, 2002).	Found in cool, clear, fast-flowing permanent streams and rivers with riffles and ample cover from riparian vegetation or overhanging banks. Spawning occurs in streams with pool and riffle complexes. Requires cold water and gravelly streambed to successfully breed (Moyle, 2002).	January-April	No. The project site does not provide habitat for this species.
Amphibians					
Ambystoma californiense California tiger salamander, Santa Barbara County Population	Endangered	Known from Alameda, Butte, Contra Costa, Fresno, Glenn, Kern, Madera, Merced, Monterey, Sacramento, San Benito, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Solano, Sonoma, Stanislaus, Tulare, and Yolo counties (Stebbins, 2003).	Found in vernal pools, ephemeral wetlands, and seasonal ponds, including constructed stockponds, in grassland and oak savannah plant communities from 3 to 1,054 meters (Stebbins, 2003).	November-February (adults) March 15 -May15 (larvae)	No. The project site does not contain habitat for this species.
Rana aurora draytonii California red-legged frog	Threatened	Known along the Coast from Mendocino County to Baja California, and inland through the northern Sacramento valley into the foothills of the Sierra Nevada mountains, south to eastern Tulare County, and possibly eastern Kern County. Currently accepted range excludes the Central valley (NatureServe, 2011).	Found in permanent and temporary pools of streams, marshes, and ponds with dense grassy and/or shrubby vegetation from 0 to 1,160 meters (NatureServe, 2011).	November-June	Yes. See text.

STATUS CODES

FEDERAL: United States Fish and Wildlife Service
FE = Federally Endangered; FT = Federally Threatened; CH = Federally Listed Critical Habitat

ATTACHMENT 4

UPDATED SPECIES LISTS

Database last updated: September 18, 2011

Report Date: December 12, 2013

Listed Species

Invertebrates

Branchinecta lynchi

Critical habitat, vernal pool fairy shrimp (X)

Amphibians

Rana draytonii

Critical habitat, California red-legged frog (X)

Key:

- (E) Endangered - Listed as being in danger of extinction.
- (T) Threatened - Listed as likely to become endangered within the foreseeable future.
- (P) Proposed - Officially proposed in the Federal Register for listing as endangered or threatened.
- (NMFS) Species under the Jurisdiction of the National Oceanic & Atmospheric Administration Fisheries Service. Consult with them directly about these species.
- Critical Habitat - Area essential to the conservation of a species.
- (PX) Proposed Critical Habitat - The species is already listed. Critical habitat is being proposed for it.
- (C) Candidate - Candidate to become a proposed species.
- (V) Vacated by a court order. Not currently in effect. Being reviewed by the Service.
- (X) Critical Habitat designated for this species

Database last updated: September 18, 2011

Report Date: December 12, 2013

Listed Species

Invertebrates

Branchinecta lynchi

Critical habitat, vernal pool fairy shrimp (X)

Key:

- (E) Endangered - Listed as being in danger of extinction.
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- Critical Habitat - Area essential to the conservation of a species.
- (PX) Proposed Critical Habitat - The species is already listed. Critical habitat is being proposed for it.
- (C) Candidate - Candidate to become a proposed species.
- (V) Vacated by a court order. Not currently in effect. Being reviewed by the Service.
- (X) Critical Habitat designated for this species

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad is (Santa Ynez (3412051) or Los Olivos (3412061))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Accipiter cooperii Cooper's hawk	ABNKC12040	None	None	G5	S3	WL
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	None	G2G3	S2	SSC
Agrostis hooveri Hoover's bent grass	PMPOA040M0	None	None	G2	S2	1B.2
Anniella pulchra pulchra silvery legless lizard	ARACC01012	None	None	G3G4T3T4Q	S3	SSC
Arctostaphylos refugioensis Refugio manzanita	PDERI041B0	None	None	G2?	S2?	1B.2
California macrophylla round-leaved filaree	PDGER01070	None	None	G2	S2	1B.1
Calochortus fimbriatus late-flowered mariposa-lily	PMLIL0D1J2	None	None	G3	S3	1B.2
Cordylanthus rigidus ssp. littoralis seaside bird's-beak	PDSCR0J0P2	None	Endangered	G5T2	S2	1B.1
Delphinium umbraculorum umbrella larkspur	PDRAN0B1W0	None	None	G2G3	S2S3.3	1B.3
Emys marmorata western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
Lasthenia glabrata ssp. coulteri Coulter's goldfields	PDAST5L0A1	None	None	G4T3	S2.1	1B.1
Lonicera subspicata var. subspicata Santa Barbara honeysuckle	PDCPR030R3	None	None	G5T2	S2	1B.2
Monardella hypoleuca ssp. hypoleuca white-veined monardella	PDLAM180A3	None	None	G4T2T3	S2S3	1B.3
Oncorhynchus mykiss irideus southern steelhead - southern California DPS	AFCHA0209J	Endangered	None	G5T2Q	S2	SSC
Rana draytonii California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
Senecio aphanactis chaparral ragwort	PDAST8H060	None	None	G3?	S2	2B.2
Southern California Steelhead Stream Southern California Steelhead Stream	CARE2310CA	None	None	GNR	SNR	
Southern Coast Live Oak Riparian Forest Southern Coast Live Oak Riparian Forest	CTT61310CA	None	None	G4	S4	
Southern Cottonwood Willow Riparian Forest Southern Cottonwood Willow Riparian Forest	CTT61330CA	None	None	G3	S3.2	
Southern Vernal Pool Southern Vernal Pool	CTT44300CA	None	None	GNR	SNR	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Southern Willow Scrub Southern Willow Scrub	CTT63320CA	None	None	G3	S2.1	
Thamnophis hammondii two-striped garter snake	ARADB36160	None	None	G4	S2	SSC
Thelypteris puberula var. sonorensis Sonoran maiden fern	PPTHE05192	None	None	G5T3	S2.2?	2B.2
Thermopsis macrophylla Santa Ynez false lupine	PDFAB3Z0E0	None	Rare	G1	S1	1B.3

Record Count: 24

CNPS California Native Plant Society Rare and Endangered Plant Inventory

Plant List

14 matches found. *Click on scientific name for details*

Search Criteria

Found in Quad 34120E1

Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Arctostaphylos refugioensis	Refugio manzanita	Ericaceae	perennial evergreen shrub	1B.2	S2?	G2?
Calandrinia breweri	Brewer's calandrinia	Montiaceae	annual herb	4.2	S3.2?	G4
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S3.2	G3
Calochortus fimbriatus	late-flowered mariposa lily	Liliaceae	perennial bulbiferous herb	1B.3	S3	G3
Cordylanthus rigidus ssp. littoralis	seaside bird's-beak	Orobanchaceae	annual herb (hemiparasitic)	1B.1	S2	G5T2
Deinandra paniculata	paniculate tarplant	Asteraceae	annual herb	4.2	S3.2	G3G4
Delphinium umbraculorum	umbrella larkspur	Ranunculaceae	perennial herb	1B.3	S2S3.3	G2G3
Fritillaria ojaiensis	Ojai fritillary	Liliaceae	perennial bulbiferous herb	1B.2	S2	G2
Lasthenia glabrata ssp. coulteri	Coulter's goldfields	Asteraceae	annual herb	1B.1	S2.1	G4T3
Monardella hypoleuca ssp. hypoleuca	white-veined monardella	Lamiaceae	herb	1B.3	S2S3	G4T2T3
Phacelia hubbyi	Hubby's phacelia	Boraginaceae	annual herb	4.2	S3.2	G3
Ribes amarum var. hoffmannii	Hoffmann's bitter gooseberry	Grossulariaceae	perennial deciduous shrub	3	S2S3	G4? T2T3
Senecio aphanactis	chaparral ragwort	Asteraceae	annual herb	2B.2	S2	G3?
Thermopsis macrophylla	Santa Ynez false lupine	Fabaceae	perennial rhizomatous herb	1B.3	S1	G1

Suggested Citation

California Native Plant Society (CNPS). 2013. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, CA. Accessed on Thursday, December 12, 2013.

CNPS California Native Plant Society Rare and Endangered Plant Inventory

Plant List

12 matches found. *Click on scientific name for details*

Search Criteria

Found in Quad 34120F1

Scientific Name	Common Name	Family	Lifeform	Rare Plant Rank	State Rank	Global Rank
Agrostis hooveri	Hoover's bent grass	Poaceae	perennial herb	1B.2	S2	G2
Amsinckia douglasiana	Douglas' fiddleneck	Boraginaceae	annual herb	4.2	S3.2	G3
Arctostaphylos refugioensis	Refugio manzanita	Ericaceae	perennial evergreen shrub	1B.2	S2?	G2?
California macrophylla	round-leaved filaree	Geraniaceae	annual herb	1B.1	S2	G2
Calochortus catalinae	Catalina mariposa lily	Liliaceae	perennial bulbiferous herb	4.2	S3.2	G3
Calochortus clavatus var. clavatus	club-haired mariposa lily	Liliaceae	perennial bulbiferous herb	4.3	S3	G4T3
Calystegia collina ssp. venusta	South Coast Range morning-glory	Convolvulaceae	perennial rhizomatous herb	4.3	S3.2	G4T3
Caulanthus amplexicaulis var. barbarae	Santa Barbara jewel-flower	Brassicaceae	annual herb	1B.1	S1	G4T1
Clinopodium mimuloides	monkey-flower savory	Lamiaceae	perennial herb	4.2	S3.2	G3
Convolvulus simulans	small-flowered morning-glory	Convolvulaceae	annual herb	4.2	S3.2	G3
Delphinium umbraculorum	umbrella larkspur	Ranunculaceae	perennial herb	1B.3	S2S3.3	G2G3
Lonicera subspicata var. subspicata	Santa Barbara honeysuckle	Caprifoliaceae	perennial evergreen shrub	1B.2	S2	G5T2

Suggested Citation

California Native Plant Society (CNPS). 2013. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, CA. Accessed on Thursday, December 12, 2013.

APPENDIX S

SHPO CONCURRENCE LETTER (NEW)

STATE OF CALIFORNIA – THE RESOURCES AGENCY EDMUND G. BROWN Jr., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street Suite 100
SACRAMENTO CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov / www.ohp.parks.ca.gov

Reply in Reference to: **BIA_2014_0303_001**

March 6, 2014

Amy Dutschke - Regional Director
United States Department of Interior
Bureau of Indian Affairs - Pacific Regional Office
2800 Cottage Way
Sacramento, CA 95825

RE: Section 106 consultation for a *Fee to Trust Conveyance-1390 acres for Santa Ynez Band of Mission Indians, Santa Barbara County*

Dear Ms. Dutschke:

Thank you for your letter of 24 February 2014 consulting pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800. You determined the above noted action is a Federal undertaking and request my concurrence on a finding of "*No Adverse Effect.*"

BIA is proposing a fee-to-trust transfer of four parcels of land (identified as APN 141-121-051, 141-140-010, 141-230-023 and 141-240-002) for the Santa Ynez Band of Mission Indians in Santa Barbara County. Encompassing a total of 1390-acres in the Santa Ynez Valley, BIA determined the Area of Potential Effect (APE) to be the aforementioned acreage and depicted it in Map-1 and -2 of the following study documenting the results of a CHRIS records search and field-survey that identified 10 unevaluated cultural resources in the APE:

- *Phase 1 and 1.5 Archaeological Investigations for the Project 1390/Camp Four/Parker Ranch, Vicinity of Santa Ynez, Santa Barbara County, California* (Archaeological Assessment and Management/Spanne 2011)

The 10 cultural resources in the APE are as follows:

- **AS-1 (CA-SBA-4019)** - A small prehistoric light density lithic scatter consisting of flaked-stone waste, utilized flakes and a core tool.
- **AS-2 (CA-SBA-4020)** - A small prehistoric light density lithic scatter of primary and secondary flakes, blades and small cores.
- **AS-3-H (CA-SBA-4021H)** - A moderate size historic resource containing a well head, a concrete block water tank foundation, stock troughs with pipe, and a light scatter of historic artifacts.
- **AS-4-H (CA-SBA-4022H)** - A multi-component resources containing a light density scatter of historic refuse and flaked-stone.
- **T-1 and T-2** - Both sites consist of one concrete stock trough.
- **PS-1, -2, -3 and -4** - The four sites consist of one rock pile each

BIA will treat the above resources as eligible properties for purposes of the proposed undertaking.

Based on a review of submitted materials, I **concur** with "*No Adverse Effect*" pursuant to 36 CFR Part 800.5(b) for the fee-to-trust undertaking.

You may have additional Section 106 responsibilities for conditions such as changes in project scope or unanticipated discoveries. Thank you for including historic properties and my comments in your project planning. Please direct questions to Jeff Brooke at (916) 445-7003 or Jeff.Brooke@parks.ca.gov.

Sincerely,

Carol Roland Nawi, Ph.D.

Carol Roland Nawi, PhD
State Historic Preservation Officer