



STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER  
GOVERNOR

CYNTHIA BRYANT  
DIRECTOR

Notice of Preparation

May 3, 2010

**received**  
5/6/10

To: Reviewing Agencies

Re: Grover Beach Lodge  
SCH# 2010051002

Attached for your review and comment is the Notice of Preparation (NOP) for the Grover Beach Lodge draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Bruce Buckingham**  
City of Grover Beach  
154 S. 8th Street  
Grover Beach, CA 93433

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Acting Director

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2010051002  
**Project Title** Grover Beach Lodge  
**Lead Agency** Grover Beach, City of

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**Type** NOP Notice of Preparation

**Description** The City of Grover Beach and the State of California have an agreement with Pacifica Companies to develop a hotel and conference center within Pismo State Beach at the end of West Grand Avenue. This destination lodging facility includes three main buildings, with 150 rooms totaling 119,770 gross square feet. Additional project components would include landscaping, parking areas (459 spaces total), public amenities including a plaza, picnic area, walkways, restroom and shower facilities, and beach drop-off areas, a new golf course practice green, and a beach concessions building.

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**Lead Agency Contact**

**Name** Bruce Buckingham  
**Agency** City of Grover Beach  
**Phone** (805) 473-4520 **Fax**  
**email** bbuckingham@grover.org  
**Address** 154 S. 8th Street  
**City** Grover Beach **State** CA **Zip** 93433

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**Project Location**

**County** San Luis Obispo  
**City** Grover Beach  
**Region**  
**Cross Streets** West Grand Ave. & Le Sage Dr.  
**Lat / Long**  
**Parcel No.**  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** GPLU: Visitor Serving-Mixed Use and Open Space/Resource Conservation  
Surrounding LU: Le Sage Riviera RV Park and Mobile Home Park to the east on the other side of Meadow Creek, the golf course to the north, and the Pismo State Beach to the west and south.

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**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Archaeologic-Historic; Geologic/Seismic; Other Issues; Toxic/Hazardous; Water Quality; Landuse; Traffic/Circulation; Noise

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**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 4; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3

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**Date Received** 05/03/2010 **Start of Review** 05/03/2010 **End of Review** 06/01/2010



## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-4082  
(916) 657-5390 - Fax



May 13, 2010



Bruce Buckingham  
City of Grover Beach  
154 S. 8<sup>th</sup> Street  
Grover Beach, CA 93433

RE: SCH#2010051002 Grover Beach Lodge; San Luis Obispo County.

Dear Mr. Buckingham:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez  
Program Analyst  
(916) 653-4040

CC: State Clearinghouse

**Native American Contact List**  
San Luis Obispo County  
May 11, 2010

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Ferrnandeño

San Luis Obispo County Chumash Council  
Chief Mark Steven Vigil  
1030 Ritchie Road Chumash  
Grover Beach CA 93433  
cheifmvgil@fix.net  
(805) 481-2461  
(805) 474-4729 - Fax

Santa Ynez Band of Mission Indians  
Vincent Armenta, Chairperson  
P.O. Box 517  
Santa Ynez , CA 93460  
varmenta@santaynezchumash.  
(805) 688-7997  
(805) 686-9578 Fax

Chumash

Diane Napoleone and Associates  
Diane Napoleone  
1433 Camino Trillado Chumash  
Carpinteria , CA 93013  
805-684-4213

Julie Lynn Tumamait  
365 North Poli Ave  
Ojai , CA 93023  
jtumamait@sbcglobal.net  
(805) 646-6214

Chumash

Santa Ynez Tribal Elders Council  
Adelina Alva-Padilla, Chair Woman  
P.O. Box 365 Chumash  
Santa Ynez , CA 93460  
elders@santaynezchumash.org  
(805) 688-8446  
(805) 693-1768 FAX

Lei Lynn Odom  
1339 24th Street  
Oceano , CA 93445  
(805) 489-5390

Chumash

Randy Guzman - Folkes  
655 Los Angeles Avenue, Unit E  
Moorpark , CA 93021  
ndnRandy@gmail.com  
(805) 905-1675 - cell  
Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2010051002 Grover Beach Lodge; San Luis Obispo County.

**Native American Contact List**  
San Luis Obispo County  
May 11, 2010

Coastal Band of the Chumash Nation  
Vennise Miller, Chairperson  
P.O. Box 4464 Chumash  
Santa Barbara CA 93140  
805-964-3447

Salinan-Chumash Nation  
Xielolixii  
3901 Q Street, Suite 31B Salinan  
Bakersfield , CA 93301 Chumash  
xielolixii@yahoo.com  
408-966-8807 - cell

Mona Olivas Tucker  
660 Camino Del Rey Chumash  
Arroyo Grande CA 93420  
(805) 489-1052 Home  
(805) 748-2121 Cell

Northern Chumash Tribal Council  
Fred Collins, Spokesperson  
67 South Street Chumash  
San Luis Obispo CA 93401  
(805) 801-0347 (Cell)

Matthew Darian Goldman  
495 Mentone Chumash  
Grover Beach CA 93433  
805-748-6913

Frank Arredondo  
PO Box 161 Chumash  
Santa Barbara Ca 93102  
805-617-6884  
ksen\_sku\_mu@yahoo.com

Santa Ynez Band of Mission Indians  
Sam Cohen, Tribal Administrator  
P.O. Box 517 Chumash  
Santa Ynez , CA 93460  
(805) 688-7997  
(805) 686-9578 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2010051002 Grover Beach Lodge; San Luis Obispo County.



# United States Department of the Interior

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



**received**  
6/4/10

IN REPLY REFER TO:  
81440-2010-CPA-0103

June 3, 2010

Bruce Buckingham  
Community Development Director  
City of Grover Beach  
154 South 8<sup>th</sup> Street  
Grover Beach, California 93433

**Subject:** Notice of Preparation of an Environmental Impact Report for the Grover Beach Lodge, Grover Beach, San Luis Obispo County, California

Dear Mr. Buckingham:

We are responding to your request for comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the subject project. Your request was dated April 30, 2010, and received in our office on May 3, 2010. The proposed project would construct a hotel and conference facilities on a lot west of Mission Creek at the end of Grand Avenue in the city of Grover Beach, California. Your request included a general project description involving the construction of buildings and parking areas, modification of existing structures, installation of landscaping, relocation of an equestrian staging area to the south side of Grand Avenue, and restoration of sand dune and wetland areas. Your request stated that a botanical survey was conducted in the project site in 2005; however, you did not include a list of the plant species that were observed or that have the potential to occur in the project area. Your request specifically identified the California red-legged frog (*Rana draytonii*) and western snowy plover (*Charadrius alexandrinus nivosus*) as federally-listed species that may occur in or near the project area.

This comment letter is based on your April 30, 2010, request, and our current understanding of species distributions and how the proposed project activities may impact listed species occurring in the project area. This letter does not constitute a full review of the impacts of the proposed project. The U.S. Fish and Wildlife Service (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibits the taking of any federally listed endangered or threatened species. Section 3(18) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential

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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 in the Act may be obtained through coordination with the Service in two ways. If a 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 the proposed project does not involve a Federal agency, but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit, pursuant to section 10(a)(1)(B) of the Act. To qualify for the permit, you would need to submit an application to the Service together with a habitat conservation plan (HCP) that describes, among other things, how the impacts of the proposed taking of federally listed species would be minimized and mitigated and how the plan would be funded. A complete description of the permitting process and the requirements for an HCP can be found at 50 CFR 17.32 and on the internet at: <http://endangered.fws.gov/hcp/hcpbook.html>.

We agree that the California red-legged frog and western snowy plover have the potential to occur in the project area. In addition to these species, we enclosed a list of other federally-listed species and critical habitat that could occur in the project area. To assist our office in adequately evaluating the proposed project, we recommend that the EIR address the projects' potential effects on these federally-listed species during construction and restoration activities, as well as daily operation of the facility. The EIR should consider measures intended to minimize potential adverse impacts on any federally-listed species. These measures could include preconstruction surveys, monitoring project activities, and avoidance of breeding bird species. We also recommend that the EIR address a situation in which an individual of a non-migratory, federally-listed species is found in the project area and cannot be avoided. Solutions may include ceasing project activities until the individual leaves on its own accord, or capturing and relocating the individual. As a reminder, capture is a form of take and would require consultation with our office.

We recommend that a botanical survey of the project site be conducted in spring when both annual and perennial plant species are detectable. This survey should include focused searches for the federally-listed plants that could occur within the vicinity of the proposed project site. We are enclosing a copy of the Service's guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants.

Bruce Buckingham

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We appreciate the opportunity to provide comments on the proposed project and look forward to working with you in the future. If you have any questions regarding this matter, please contact David Simmons of our staff at (805) 644-1766, extension 368.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Dellith", with a large, stylized flourish at the end.

Chris Dellith  
Senior Biologist

Enclosures

cc:

Deborah Hilliard, California Department of Fish and Game  
Bob Stafford, California Department of Fish and Game  
Bruce Henderson, U.S. Army Corps of Engineers

**ENDANGERED AND THREATENED SPECIES WHICH MAY OCCUR IN THE  
PROPOSED GROVER BEACH LODGE PROJECT AREA,  
CITY OF GROVER BEACH, SAN LUIS OBISPO COUNTY, CALIFORNIA**

Birds

California least tern	<i>Sterna antillarum browni</i>	E
Least Bell's vireo	<i>Vireo bellii pusillus</i>	E
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	T

Amphibians

California red-legged frog	<i>Rana draytonii</i>	T
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Fish

Steelhead trout*	<i>Oncorhynchus mykiss</i>	*
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Plants

Gambel's watercress	<i>Rorippa gambellii</i>	E
La Graciosa thistle	<i>Cirsium loncholepis</i>	E, CH
Marsh sandwort	<i>Arenaria paludicola</i>	E
Nipomo Mesa lupine	<i>Lupinus nipomensis</i>	E
Pismo clarkia	<i>Clarkia speciosa ssp. immaculata</i>	E

**Key:**

- E        Endangered
- T        Threatened
- CH      Critical Habitat
- \*        The National Marine Fisheries Service is the responsible agency for the steelhead.

## **Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants**

These guidelines describe protocols for conducting botanical inventories for federally listed, proposed and candidate plants, and describe minimum standards for reporting results. The Service will use, in part, the information outlined below in determining whether the project under consideration may affect any listed, proposed, or candidate plants, and in determining the direct, indirect, and cumulative effects.

Field inventories should be conducted in a manner that will locate listed, proposed, or candidate species (target species) that may be present. The entire project area requires a botanical inventory, except developed agricultural lands. The field investigator(s) should:

1. Conduct inventories at the appropriate times of year when target species are present and identifiable. Inventories will include all potential habitats. Multiple site visits during a field season may be necessary to make observations during the appropriate phenological stage of all target species.
2. If available, use a regional or local reference population to obtain a visual image of the target species and associated habitat(s). If access to reference populations(s) is not available, investigators should study specimens from local herbaria.
3. List every species observed and compile a comprehensive list of vascular plants for the entire project site. Vascular plants need to be identified to a taxonomic level which allows rarity to be determined.
4. Report results of botanical field inventories that include:
  - a. a description of the biological setting, including plant community, topography, soils, potential habitat of target species, and an evaluation of environmental conditions, such as timing or quantity of rainfall, which may influence the performance and expression of target species
  - b. a map of project location showing scale, orientation, project boundaries, parcel size, and map quadrangle name
  - c. survey dates and survey methodology(ies)
  - d. if a reference population is available, provide a written narrative describing the target species reference population(s) used, and date(s) when observations were made
  - e. a comprehensive list of all vascular plants occurring on the project site for each habitat type
  - f. current and historic land uses of the habitat(s) and degree of site alteration
  - g. presence of target species off-site on adjacent parcels, if known





**AIR POLLUTION  
CONTROL DISTRICT**  
COUNTY OF SAN LUIS OBISPO

June 4, 2010

Bruce Buckingham  
Community Development Director  
City of Grover Beach  
154 South 8th Street  
Grover Beach, CA 93433

**SUBJECT:** Air Pollution Control District (APCD) Comments Regarding the Grover Beach  
Lodge Notice of Preparation (NOP).

Dear Mr. Buckingham,

Thank you for including the San Luis Obispo (SLO) County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at California Highway 1 and the west end of West Grand Avenue in Grover Beach. The City of Grover Beach and the State of California have an agreement with Pacifica Companies to develop a hotel and conference center within Pismo State Beach at the end of West Grand Avenue. The project includes three main buildings with 150 rooms and 119,770 gross square feet. Additional project components include landscaping, 459 parking spaces, a plaza, picnic area, golf course practice green, restroom and shower facilities and a beach concessions building. The project includes patio seating areas for the existing Fins Seafood Restaurant. The pro golf shop and special events tent area will remain in place. The project proposes to relocate the existing equestrian parking and sanitary dump station areas to a location immediately south of Grand Avenue.

*The following are APCD comments that are pertinent to this project.*

1. APCD Contact Person:

Gary Arcemont  
Air Pollution Control District  
3433 Roberto Court  
San Luis Obispo, CA 93401  
(805) 781-5912

2. Permit(s) or Approval(s) Authority:

Permits for Portable Equipment

Portable equipment used during construction activities may require statewide registration or an APCD permit. Additionally, future developments may require APCD permits and/or applicants may need to apply for an Authority to Construct. Please contact our Engineering Division at (805) 781-5912 prior to final permit approval for more information on APCD permits.

#### Naturally Occurring Asbestos

The project site is located in a candidate area for Naturally Occurring Asbestos (NOA), which has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, **prior to any grading activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine whether NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District (see Attachment 1). If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM.** This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. Please refer to the APCD web page at <http://www.slocleanair.org/business/asbestos.asp> for more information or contact the APCD Enforcement Division at 781-5912.

#### Demolition Activities

The project referral did not indicate whether the existing structures on the proposed site will be demolished. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). **If utility pipelines are scheduled for removal or relocation; or building(s) are removed or renovated this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).** These requirements include but are not limited to: 1) notification requirements to the District, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at 781-5912 for further information.

#### Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the APCD's 2009 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Internal combustion engines;
- Unconfined abrasive blasting operations;
- Concrete batch plants;
- Rock and pavement crushing;
- Tub grinders; and
- Trommel screens.

**To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

Operational Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the APCD's 2009 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Boilers;
- Internal combustion engines; and
- Cogeneration facilities.

**To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

3. Environmental Information:

The potential air quality impacts should be assessed in the Environmental Impact Report (EIR). This analysis should address both short-term and long-term emissions impacts (including traditional air pollutants and greenhouse gas emissions) and include the following information:

- a) A description of existing air quality and emissions in the impact area, including the attainment status of SLO County relative to State and Federal air quality standards and any existing regulatory restrictions to development. The most recent Clean Air Plan should be consulted for applicable information.
- b) A complete emission analysis should be performed on all relevant emission sources, using emission factors from the EPA document AP-42 "Compilation of Air Pollutant Emission Factors", the latest approved version of URBEMIS, EMFAC, OFF-ROAD or other approved emission calculator tools. The emissions analysis should include calculations for estimated emissions from both construction and operational activities. Documentation of emission factors and all assumptions (i.e. anticipated land uses, average daily trip rate from trip generation studies, average trip length, vehicle and equipment emission factors, etc.) should be provided in an appendix to the EIR. The quantitative analysis should address criteria pollutants, greenhouse gases, toxics, diesel particulate matter and fugitive dust.
- c) The EIR should include a range of feasible alternatives to the proposed project that could effectively minimize air quality impacts. A thorough emissions analysis should be conducted for each of the proposed alternatives identified. The EIR author should contact the SLO County APCD if additional information and guidance is required. All calculations and assumptions used should be fully documented in an appendix to the EIR.

- d) Assembly Bill 32, the California Global Warming Solution Act of 2006 and California Governor Schwarzenegger Executive Order S-3-05 (June 1, 2005), both require reductions of greenhouse gases (GHG) in the State of California. The Governor has recognized mitigation efforts will be necessary to reduce greenhouse gas emissions. In order to address these issues, greenhouse gas emissions should be evaluated for construction and operational impacts in the EIR, and appropriate mitigation identified.
- e) A cumulative impact analysis should be performed to evaluate the combined air quality impacts of this project and impacts from existing and proposed future development in the area. This should encompass all planned construction activities within one mile of the project.
- f) The data analyses should address local and regional impacts with respect to maintaining applicable air quality standards. Authors should consult the SLO County APCD to determine whether a modeling analysis should be performed and included in the EIR.
- g) Any temporary construction impacts, such as fugitive dust and combustion emissions from construction and grading activities, should be quantified and mitigation measures proposed.
- h) Mitigation measures to reduce or avoid significant air quality impacts should be recommended. The EIR should address any proposed off-site mitigation measures and describe feasible mitigation measures to reduce air quality impacts on-site. Offsite mitigation may be required in the event that emissions cannot be reduced below APCD specified thresholds.

4. Permit Stipulations/Conditions:

See Section 2 for applicable construction and operational phase permit requirements. It is recommended that you refer to the "2009 CEQA Air Quality Handbook" (the Handbook). If you do not have a copy, it can be accessed on the APCD web page ([www.slocleanair.org](http://www.slocleanair.org)) in the Business Assistance section, listed under Regulations, or a hardcopy can be requested by contacting the APCD. The Handbook provides information on mitigating emissions from development which should be referenced in the Draft EIR.

5. Alternatives:

Any alternatives described in the Draft EIR should involve the same level of air quality analysis as described in bullet items 3.b, 3.c and 3.d listed above.

6. Reasonably Foreseeable Projects, Programs, or Plans:

The 2009 version of the APCD's CEQA Air Quality Handbook provides guidance for preparing the EIR.

7. Relevant Information:

The 2009 version of the APCD's CEQA Air Quality Handbook should be referenced in the EIR for determining the significance of impacts and level of mitigation recommended.

8. Further Comments:

Estimate the construction and operational phase impacts of this project in the EIR. The air quality assessment should include all associated construction activities and pollutants identified in Chapter 2 of the 2009 version of the APCD's CEQA Air Quality Handbook.

Sensitive Receptors

This project is located next to an existing residential area, which includes sensitive receptors. The EIR should include an evaluation of the project air quality impact on the sensitive receptors. See Section 2.1.1 of the APCD 2009 CEQA Handbook for guidance.

Car Free Mitigation

The APCD encourages promotion of the APCD Car Free program and promotion of Amtrak train travel to the nearby Grover Beach Amtrak Station as a means of reducing vehicle trips to the facility.

Thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Gary Arcemont  
Air Quality Specialist

GJA/AJM/MAG/AAG/lmg

cc: Pacifica Companies, 1785 Hancock, Ste 100 San Diego, CA 92110  
California Office of Planning & Research, 1400 10<sup>th</sup> St. Sacramento, CA 95814  
Tim Fuhs, Enforcement Division, APCD  
Karen Brooks, Enforcement Division, APCD  
Gary Willey, Engineering Division, APCD

Attachments:

1. Naturally Occurring Asbestos – Construction & Grading Project Exemption Request Form, Construction & Grading Project Form