

# CHAPTER 9

## RESPONSE TO COMMENTS

Information received in this Response to Comments chapter clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR that would result in a new or substantially increased environmental impact as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document under CEQA Guidelines §15088.5.

The Response to Comments chapter includes comment letters received on the Draft Environmental Impact Report (EIR) for the City of Grover Beach Lodge and Conference Center. Any changes referenced in this chapter will be noted in the Final EIR through use of ~~strike through~~ for deleted text and underline for inserted text as well as a vertical line in the outside margin.

### 9.1 DRAFT EIR AGENCY COMMENT LETTERS AND RESPONSES

The following federal, state, and local agencies have prepared comments on the Draft EIR:

Respondent	Code	Contact	Page
<b>State of California</b> <b>Office of Planning and Research</b> <b>State Clearinghouse and Planning Unit</b> Notification of Submittal Letter dated: January 28, 2011	SCH	1400 10th Street Sacramento, CA 95812 www.ceqanet.ca.gov	9-3
<b>San Luis Obispo County</b> <b>Air Pollution Control District</b> Letter dated: January 26, 2011	APCD	3433 Roberto Court San Luis Obispo, CA 93401 (805) 781-5912 info@slocleanair.org <i>Contact: Gary Arcemont,            Air Quality Specialist</i>	9-8
<b>State of California</b> <b>Department of Transportation, District 5</b> Letter dated: January 28, 2011	Caltrans	50 Higuera Street San Luis Obispo, CA 93401 (805) 549-3101 <i>Contact: Chris Shaeffer,            Development Review</i>	9-10
<b>San Luis Obispo Council of Governments</b> Letter dated: January 28, 2011	SLOCOG	1114 Marsh Street San Luis Obispo, CA 93401 (805) 781-4219 <i>Contact: Richard Murphy,            Programming and            Project Delivery Manager</i>	9-13

Respondent	Code	Contact	Page
<b>California Coastal Commission</b> Letter dated: February 4, 2011	CCC	Central Coast District Office 725 Front Street, Suite 300 Santa Cruz, CA 95080 (831) 427-4863 <i>Contact: Madeline Cavaliere, Coastal Planner</i>	9-17

The letters of comment are given in the above chronological order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.



JERRY BROWN  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



January 28, 2011

**received**  
1/31/11

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

Subject: Grover Beach Lodge and Conference Center  
SCH#: 2010051002

Dear Bruce Buckingham:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 27, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
(916) 445-0613 FAX (916) 323-9018 www.opr.ca.gov

Document Details Report  
State Clearinghouse Data Base

<b>SCH#</b>	2010051002		
<b>Project Title</b>	Grover Beach Lodge and Conference Center		
<b>Lead Agency</b>	Grover Beach, City of		
<b>Type</b>	EIR	Draft EIR	
<b>Description</b>	The goal of the project is to construct a lodge and conference center on State Parks property in the City of Grover beach consistent with the Joint Powers Agreement between the City of Grover Beach and the California Department of Parks and Recreation, Pacifica Hosts, Inc., will be the developer and concessionaire under Concession Contract with State Parks. The City will amend the zoning ordinance, request an amendment to the LCP, issue a use permit and approve a Site and Architectural Plan.		
<b>Lead Agency Contact</b>			
<b>Name</b>	Bruce Buckingham		
<b>Agency</b>	City of Grover Beach		
<b>Phone</b>	(805) 473-4525	<b>Fax</b>	
<b>email</b>			
<b>Address</b>	154 S. 8th Street	<b>State</b>	CA
<b>City</b>	Grover Beach	<b>Zip</b>	93433
<b>Project Location</b>			
<b>County</b>	San Luis Obispo		
<b>City</b>	Grover Beach		
<b>Region</b>			
<b>Lat / Long</b>	35° 7' 21" N / 120° 38' 38" W		
<b>Cross Streets</b>	Hwy 1 and West Grand Ave.		
<b>Parcel No.</b>	060-361-010,011		
<b>Township</b>	32S	<b>Range</b>	12E
		<b>Section</b>	24
		<b>Base</b>	MDB&M
<b>Proximity to:</b>			
<b>Highways</b>	Hwy 1		
<b>Airports</b>	Oceano		
<b>Railways</b>	UPRR		
<b>Waterways</b>	Meadow Creek		
<b>Schools</b>	No		
<b>Land Use</b>	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.		
<b>Project Issues</b>			
	Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Economics/Jobs; Landuse; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Cumulative Effects		
<b>Reviewing Agencies</b>			
	Resources Agency; California Coastal Commission; Department of Fish and Game, Region 4; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Native American Heritage Commission		
<b>Date Received</b>	12/14/2010	<b>Start of Review</b>	12/14/2010
		<b>End of Review</b>	01/27/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

**State Clearinghouse Notification of Submittal, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
SCH-1	This notification acknowledges compliance with State Clearinghouse review requirements and identifies the agencies that were notified by the State Clearinghouse. This notification is included for informational purposes and no further response to this letter is necessary.



January 26, 2011

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

SUBJECT: Air Pollution Control District (APCD) Comments Regarding the Grover Beach Lodge Draft Environmental Impact Report (DEIR)

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. Table 4.2-1, Page 4-37 Attainment Status:

Use current status available on the APCD website, located:

[http://www.slocleanair.org/air/sd92010/SLO\\_Attain\\_Nov2010.pdf](http://www.slocleanair.org/air/sd92010/SLO_Attain_Nov2010.pdf)

2. 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). NOA was mentioned in Section 4.2.3.2 on page 4-40, however the following information was not included in the DEIR. The DEIR should be modified to include the text below:

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

3433 Roberto Court, San Luis Obispo, CA 93401 • 805-781-5912 • FAX: 805-781-1002  
info@slocleanair.org • www.slocleanair.org

DEIR for Grover Beach Lodge  
January 26, 2011  
Page 2 of 3

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.

3. Demolition Activities

Demolition operations were mentioned in Section 4.2.3.2 on page 4-40, however the following information was not included in the DEIR. The DEIR should be modified to include the text below:

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.

4. Air Quality Impact 1: Operational and Area Source Emissions:

As stated in the APCD's 2009 CEQA Handbook (page 3-14, Table 3-4 titled Mitigation Threshold Guide) off-site mitigation may be necessary for high vehicle dependent projects. The statement found in the DEIR under Residual Impacts on page 4-49 is not accurate and should be corrected as follows:

Due to the vehicle dependent nature of the proposed project, it may be difficult to reduce ROG + NO<sub>x</sub> emissions from the 18 selected on-site mitigation measures to a level of insignificance. The project proponent should calculate the emission reduction effectiveness of the 18 selected mitigation measures and compare the mitigated emissions total to the APCD's 25 lb/day ROG + NO<sub>x</sub> CEQA threshold.

If operational phase emissions cannot be adequately mitigated with on-site mitigation measures alone, off-site mitigation measures are needed in order to reduce air quality impacts to a level of insignificance. Whenever off-site mitigation measures are deemed necessary, it is important that the developer, lead agency and APCD to work together to develop and implement the measures to ensure successful outcome. This work should begin at least six months prior to issuance of occupancy permits for the project.

Examples of potential off-site mitigation for this project may include:

- Support of the SLO Car Free program to promote of Amtrak train travel to the nearby Grover Beach Amtrak Station as a means of reducing vehicle trips to the facility;
- Install a rapid charge electric vehicle (EV) station;
- Assist in the implementation of Grover Beach's Bicycle Master Plan; and/or
- Contribute to funding of new bike lanes.

APCD-3  
(cont'd)

APCD-4

APCD-1

APCD-2

APCD-3

APCD-5

DEIR for Grover Beach Lodge  
 January 26, 2011  
 Page 3 of 3

5. Air Quality Impact 2: Construction Activity Management Plan (CAMP)

Air Quality Mitigation Measure #2 on page 4-51 of the DEIR titled "Construction Activity Management Plan" should be modified to include the following: Please submit the CAMP to the APCD for review and approval. The APCD will review the CAMP to verify that mitigation measures are implemented to reduce emissions below CEQA thresholds.

6. Greenhouse Gas Impacts and Mitigation

Assembly Bill 32, the California Global Warming Solution Act of 2006 requires reductions of greenhouse gases (GHG) in the State of California. Following the adoption of SB 97, the Natural Resources Agency adopted Amendments to the CEQA Guidelines for greenhouse gas emissions. Based on these guidelines, GHGs (e.g., CO<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub>) from all projects subject to CEQA must be quantified and mitigated to the extent feasible. Estimated CO<sub>2</sub> emissions from the construction and operational phases of the project are provided in Tables 4.2-7 and 4.2-8.

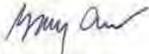
The California Office of Planning and Research has provided the following direction to lead agencies for the assessment and mitigation of GHG emissions:

- Regardless of the size, projects are cumulatively considerable. Lead agencies shall evaluate a proposed project's direct and/or indirect climate change impacts; and,
- Implement all feasible mitigation measures to reduce GHG emissions.

Prior to finalizing the project's EIR, the applicant will need to present to the APCD for review and approval their good-faith effort to add a GHG mitigation measure that lists the feasible mitigation that would be implemented, should the project move forward.

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

Sincerely,



Gary Arcemont  
 Air Quality Specialist

GJA/AAG/arr

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:

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

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**Naturally Occurring Asbestos  
 Construction & Grading Project Exemption Request Form**

APCD-6

APCD-7

Applicant Information/ Property Owner		Project Name	
Address		Project Address and /or Assessor's Parcel Number	
City, State, Zip		City, State, Zip	
Email Address		Email Address	
Phone Number	Date Submitted	Agent	Phone Number

The District may provide an exemption from Section 93105 of the California Code of Regulations - **Asbestos Airborne Toxic Control Measure For Construction, Grading, Quarrying, And Surface Mining Operations** for any property that has any portion of the area to be disturbed located in a geographic ultramafic rock unit; if a registered geologist has conducted a geologic evaluation of the property and determined that no serpentine or ultramafic rock is likely to be found in the area to be disturbed. Before an exemption can be granted, the owner/operator must provide a copy of a report detailing the geologic evaluation to the District for consideration. The District will approve or deny the exemption within 90 days. An outline of the required geological evaluation is provided in the District handout "ASBESTOS AIRBORNE TOXIC CONTROL MEASURES FOR CONSTRUCTION, GRADING, QUARRYING, AND SURFACE MINING OPERATIONS – Geological Evaluation Requirements."

**NOTE: A basic exemption evaluation fee of \$165.00 will be charged.**

**APPLICANT MUST SIGN BELOW:**

I request the San Luis Obispo County Air Pollution Control District grant this project exemption from the requirements of the ATCM based on the attached geological evaluation.

Legal Declaration/Authorized Signature \_\_\_\_\_ Date: \_\_\_\_\_

OFFICE USE ONLY - APCD Required Element - Geological Evaluation			
Intake Date:	APCD Staff:	OIS Site #:	OIS Project #:
Date Reviewed:	APCD Staff:	Approved	Not Approved
Comments:			

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July 30, 2009



**Naturally Occurring Asbestos  
Construction and Grading Project Form**

Applicant Information/Property Owner		Project Name	
Address		Project Address and/or Assessor's Parcel Number	
City, State, Zip		City, State, Zip	
Email		Email	
Phone Number	Date Submitted	Agent	Phone Number
Check Applicable	DESCRIPTION (attach applicable required information)	APCD REQUIREMENT 1	APCD REQUIREMENT 2
	Project is subject to NOA requirements but NOT disturbing NOA	Geological Evaluation	Exemption Request Form
	Project is subject to NOA requirements and project is disturbing NOA – more than one acre	Geological Evaluation	Dust Control Measure Plan
	Project is subject to NOA requirements and project is disturbing NOA – one acre or less	Geological Evaluation	Mini Dust Control Measure Plan

Please note that the applicant will be invoiced for any associated fees

REQUIRED APPLICANT SIGNATURE:

Legal Declaration/Authorized Signature \_\_\_\_\_ Date \_\_\_\_\_

APCD OFFICE USE ONLY				
Geological Evaluation	Exemption Request Form	Dust Control Measure Plan	Monitoring, Health and Safety Plan	
Approved: Yes <input type="checkbox"/> No <input type="checkbox"/>				
Comments:	Comments:	Comments:		
APCD Staff:	Intake Date:	Date Reviewed	OIS Site #	OIS Proj #
Invoice No.	Basic Fee	Additional Fees	Billable Hrs	Total Fees

\\ENFORCE\PROGRAM\FORMS\NOAC&G\_Project\_Form (2009 Version).doc

July 20, 2009

**Response to Letter from San Luis Obispo County Air Pollution Control District, dated January 26, 2011**

Comment No.	Response
APCD-1	This comment introduces the Air Pollution Control District's comments on the air quality, greenhouse gas, and naturally occurring asbestos impacts associated with the proposed projects. No further response is necessary.
APCD-2	This comment corrects a mistake in Table 4.2-1, "Attainment Status in San Luis Obispo." The table is edited to include the updated attainment status information available at <a href="http://www.slocleanair.org/air/pdf/2010/SLO_Attain_Nov2010.pdf">www.slocleanair.org/air/pdf/2010/SLO_Attain_Nov2010.pdf</a> . Table 4.2-1, as amended, is reproduced in Section 4.2, Air Quality, of the EIR.
APCD-3	The comment discusses the potential for naturally occurring asbestos at the project site, and recommends compliance with the measures listed in the ARB's Asbestos Toxics Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations as they relate to naturally occurring asbestos. The San Luis Obispo region is known to contain areas of ultramafic, or serpentine, rocks which contain naturally occurring forms of asbestos. Exposure and disturbance of rock and soil that contains naturally occurring asbestos can result in a release of fibers into the air and a consequent exposure to workers or the public. However, based on review of geologic maps and the Geology Report for the project (EIR Appendix I), the project site is underlain entirely by sand dune deposits, older sand dune deposits, and alluvial deposits. There are no areas of ultramafic or serpentine rocks at the project site that could potentially be disturbed during project construction. Therefore, the potential for naturally occurring asbestos to be present is not likely, and this is not considered to be an environmental concern. Language clarifying this result has been added to the Final EIR.
APCD-4	<p>The comment provides clarification to the potential impacts that could be caused by demolition activities where asbestos-containing materials may be encountered. The following language has been included in the EIR:</p> <p>"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). Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). 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 (40 CFR 61, 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."</p>
APCD-5	<p>This comment discusses the APCD's policy of requiring off-site mitigation for high vehicle dependent projects, when operational and area source emissions cannot be mitigated to a level of insignificance. The following language has been included in the EIR:</p> <p>"Due to the vehicle dependent nature of the proposed project, it may be difficult to reduce ROG and NOx emissions from the 18 selected on-site mitigation measures to a level of insignificance. The project proponent should calculate the emission reduction effectiveness of the 18 selected mitigation measures and compare the mitigated emissions total to the APCD's 25 lb/day ROG and NOx CEQA threshold.</p> <p>If operational phase emissions cannot be adequately mitigated with on-site mitigation measures alone, off-site mitigation measures are needed in order to reduce air quality impacts to a level of insignificance. Whenever off-site mitigation measures are deemed necessary, it is important</p>

Comment No.	Response
	<p>that the developer, lead agency and APCD work together to develop and implement the measures to ensure successful outcome. This work should begin at least six months prior to issuance of occupancy permits for the project.</p> <p>Examples of potential off-site mitigation for this project include:</p> <ul style="list-style-type: none"> <li>▪ Support of the SLO Car Free program to promote use of Amtrak train travel to the nearby Grover Beach Amtrak Station as a means of reducing vehicle trips to the facility;</li> <li>▪ Installation of a rapid charge electric vehicle (EV) station;</li> <li>▪ Assistance in the implementation of the West Grand Avenue Master Plan; and/or</li> <li>▪ Contribution to funding of new bike lanes.”</li> </ul>
APCD-6	<p>This comment clarifies the requirement in AQ/mm-2 that the CAMP be submitted to the APCD for approval. Mitigation measure AQ/mm-2 has been edited to clarify APCD requirements as follows:</p> <p><b>“Construction Activity Management Plan.</b> <i>Prior to issuance of any grading permits for All Areas of the project, a comprehensive Construction Activity Management Plan (CAMP), shall be developed and the following construction mitigation measures shall be itemized on the construction plans. The CAMP will be submitted to the City of Grover Beach Community Development Director and the APCD for review and approval. Revised post-mitigation emission calculations will be quantified and compared to the 2009 APCD CEQA Handbook thresholds and the Community Development Director and APCD will review the CAMP to verify that mitigation measures are implemented to reduce emissions below CEQA thresholds. The Plan shall include the Best Available Control Technology for Construction equipment (CBACT) measures that the SLOAPCD has identified to reduce construction emissions. The Plan shall also stipulate compliance with the requirements of APCD Rule 403 to reduce fugitive dust emissions. The construction mitigation measures applicable to the proposed project are summarized below...”</i></p>
APCD-7	<p>The comment states that, pursuant to AB 32, SB 97 and Office of Planning and Research guidance, assessment and mitigation of GHG emissions is necessary in the EIR. The comment recommends that a good-faith effort be made to add a GHG mitigation measure that lists the feasible mitigation that would be implemented should the project move forward.</p> <p>GHGs are discussed separate from Air Quality impacts in the EIR. Section 4.5, Greenhouse Gas Emissions and Adaptations, of the EIR addresses GHG emissions and adaptations associated with the proposed project. Evaluation of the project’s direct and/or indirect impacts on climate change and GHGs are included in Section 4.5 of the EIR. Mitigation measures that would be implemented should the project move forward are listed in Section 4.5.5, Project-Specific Impacts and Mitigation Measures, of the EIR, including five construction measures and 14 operation measures. This analysis meets the requirements of AB 32, SB 97, and OPR requirements.</p>

DEPARTMENT OF TRANSPORTATION

50 HUBBARD STREET  
SAN LUIS OBISPO, CA 93401-5415  
PHONE: (805) 549-3101  
FAX: (805) 549-3329  
TDD: (805) 549-3259  
http://www.dot.ca.gov/dist05/



*Flex your power!  
Be energy efficient!*

January 28, 2011

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

SLO – 1 – 14.09  
SCH 2010051002

Subject: Grover Beach Lodge and Conference Center Draft Environmental Impact Report

Dear Mr. Buckingham:

Thank you for the opportunity to review and comment upon the subject project and Draft Environmental Impact Report. The project is located adjacent to Meadow Creek. This creek historically has a propensity to flood State Route 1 during significant storm events. The DEIR does not appear to adequately appreciate or analyze this relationship and the proposed project's additional contributory impacts. Caltrans offers the following comments which are specific to hydrology:

Caltrans-1

The project proposes to detain the flow created by an increase in impervious area. Detention may not be sufficient at this location. Detaining flows only reduces the peak flow rate, but the total volume of runoff from the development will be increased. Meadow Creek is very heavily vegetated and its outlet is controlled by the Oceano Lagoon. The combination of these factors causes the creek to back up and take a long time to drain. The increased runoff coming from the Lodge project will likely take much less time to reach the creek than the time required for the creek's flows to diminish during and after a significant storm event.

Caltrans-2

Because of the known capacity and flood challenges in Meadow Creek, it is Caltrans' perspective that the total volume of flow from the development will be added to an already overcapacity creek and exacerbate the existing flooding problems.

Caltrans-3

The only way to ensure that this will not occur is to retain, rather than detain, the additional flow. i.e., all the additional runoff created by the development would have to be captured and kept from getting to Meadow Creek at all. This is usually done by building a large basin, or perhaps series of basins, to hold the flow until it infiltrates into the ground. However, this concept in itself is of concern in this location due to water table elevation

Caltrans-4

*"Caltrans improves mobility across California"*

*"Caltrans improves mobility across California"*

Bruce Buckingham, Director  
January 28, 2011  
Page 2

and soil saturation during a storm event. Additional analysis regarding retention feasibility would be required.

Caltrans-4  
(cont'd)

With this said, San Luis Obispo County Flood Control should be thoroughly apprised of this project's proposed course of action and sought for guidance. Following their input, either the applicant, the County, or the lead agency should provide evidence to Caltrans that the proposed project's flow volume increases will not impact the highway, or other downstream properties.

Caltrans-5  
Caltrans-6

If you have any questions about this letter or would like to follow up with staff further, I can be reached at (805) 549-3632.

Sincerely,

Chris Shaeffer  
Development Review  
Caltrans District 5

cc. L. Newland, CT  
L. Wickham, CT  
F. Boyle, CT

**Response to Letter from California Department of Transportation, District 5, dated January 28, 2011**

Comment No.	Response
Caltrans-1	<p>This comment introduces Caltrans's comments on Section 4.6, Hydrology and Water Quality, of the EIR. It is noted that Meadow Creek historically has flooded State Route 1 during significant storm events. No further response is necessary.</p>
Caltrans-2	<p>This comment states that detention of storm waters may not be sufficient at this site due to the current condition and capacity of Meadow Creek and the potential increase in total volume of runoff resulting from the development. It is noted that Meadow Creek is heavily vegetated and its outlet is controlled by Oceano Lagoon.</p> <p>The project site currently drains naturally into Meadow Creek. The <u>revised Preliminary Hydrology Study</u>, in Appendix <del>N</del><sup>K</sup>, reports that in a 100-year storm event, the existing site creates <del>22.33</del> <del>18.14</del> cfs of peak flow runoff into Meadow Creek. Although the proposed project increases impervious surfaces by approximately 11%, because the proposed project would utilize detention basins to slow surface water runoff into Meadow Creek and allow percolation into the ground, in a 100-year storm event the proposed project would result in <del>15.88</del> <del>17.51</del> cfs of peak flow runoff into Meadow Creek. The project would result in a net peak flow reduction of <del>6.45</del> <del>0.63</del> cfs into Meadow Creek. The Hydrology Study also shows net reductions in peak flows during 2-year, 10-year, and 25-year storms.</p> <p>In response to Caltrans' comments related to the potential increase in volume of runoff, the project applicant has provided additional hydrology calculations, which support the original report and provide an additional comparison of pre- and post-development runoff volumes in a 100-year storm event. The <del>January 19, 2012</del> <del>May 2, 2011</del> <u>revised Preliminary Hydrology Study Addendum</u> (which has been included in the <u>Revised Final EIR</u> as Appendix <del>N</del><sup>K-4</sup>) concludes that the existing site creates <del>2.760</del> <del>2.679</del> acre feet of runoff volume in a 100-year storm. Utilizing the detention basins identified in the EIR and detailed in the Project Description, the post-development project would result in <del>2.761</del> <del>2.634</del> acre feet of volume in a 100-year storm. Therefore, the proposed project would <del>also result in a 0.001 increase in runoff volume</del> <del>net reduction of volume of runoff of 0.048 acre feet in a 100-year storm event.</del> <u>The project applicant proposes to utilize the proposed basins located in areas PR-1A, 2, 3, and 5 for additional detention, which will decrease the post-development runoff volume to pre-existing rates for the entire project.</u></p> <p>The City and project applicant have conferred with Caltrans throughout the comment period, and Caltrans staff have confirmed that the volume analysis contained in the <u>original Hydrology Addendum</u> satisfies their concern that the project would contribute to the existing flooding in the area of Highway 1 and Meadow Creek. Caltrans reviewed the Hydrology Addendum and had no further comments on the project. <u>It is anticipated that the data contained in the January 19, 2012 revised Preliminary Hydrology Study would be similarly acceptable to Caltrans.</u></p> <p>Please refer to Chapter 2, Project Description, and Appendices <del>K</del> <sup>K</sup> and <del>N</del> <sup>N</sup> of the EIR for information related to the proposed drainage improvements. <del>Refer also to the Hydrology Addendum located at Appendix K-4.</del></p>
Caltrans-3	<p>This comment states that it is Caltrans's position that the total volume of flow from the proposed project would be added to an already overcapacity creek and exacerbate the existing flooding problems.</p> <p>According to the preliminary hydrologic study prepared by the applicant's engineer, the proposed project would not increase peak flow runoff to Meadow Creek. The <u>May 2, 2011 Hydrology Addendum</u> <u>and January 19, 2012 revised</u> similarly concludes that the proposed project would not result in an increase in overall volume of runoff generated by a 100-year storm. Low Impact Development standards are proposed to detain drainage on site and the <u>original and revised Preliminary Hydrology Reports and Addendum</u> prepared for the proposed project indicates that peak flowrate and volume of runoff to Meadow Creek would be <u>maintained or slightly reduced</u> by on site drainage improvements. Caltrans staff</p>

Comment No.	Response
	<p>have reviewed the Hydrology Addendum and have stated that it adequately satisfies their concerns that the project would exacerbate the existing flooding problems on Highway 1.</p> <p>Please refer to the response to Caltrans-2, above, and Chapter 2, Project Description, and Appendices <u>K and N</u> of the EIR for information related to the proposed drainage improvements.</p>
Caltrans-4	<p>The comment claims that the only way to ensure that the project will not further exacerbate flooding problems at the project site and/or associated with Meadow Creek is to retain, rather than detain, all additional flows and runoff created by the development.</p> <p>The proposed project includes detention basins throughout the design (refer to Figure 2-9 of Chapter 2, Project Description). The LID proposal allows the sandy soil to absorb drainage on site and slightly reduces existing flow into Meadow Creek. The <u>onsite basins and parking areas</u> would also function as detention facilities and detain flows during flood periods. The Hydrology Reports (Appendices <u>K and N</u>) concludes that the project would result in a slight decrease in peak flows using the detention basins as designed. The Hydrology Addendum further concludes that the project would result in a slight decrease in overall volume of runoff using the detention basins as designed.</p> <p>The Hydrology Addendum (May 2011) also incorporated the results of FEMA's Flood Insurance Study for a 100-year storm in the Meadow Creek Basin. The Addendum concludes that peak flows will be reduced by 4.39 cfs in a 100-year storm. The FEMA study does not include information for 2-year, 10-year, or 25-year storms; thus, the conclusions reached in the original Hydrology Report for these storm events continue to be based on the best information available. The FEMA Flood Insurance Study is available for review at City of Grover Beach offices. <u>The revised Preliminary Hydrology Study (January 2012), which analyzed the proposed project revisions, also concludes that peak flows would be reduced by 6.45 cfs in a 100-year storm, as well as in a 2-year, 10-year, and 25-year storm.</u></p> <p>Because the detention basins <u>and proposed ponds</u>, as designed, would create net decreases in both peak flows and overall volume, retention basins are not necessary. Caltrans has reviewed the Hydrology Addendum and had no further comments on the project.</p> <p>Please also refer to the response to Caltrans-2 and Caltrans-3, above.</p>
Caltrans-5	<p>The commenter recommends that San Luis Obispo County Flood Control be thoroughly apprised of the project's proposed course of action and contacted for guidance regarding the potential for flooding at the project site. It is understood that Highway 1 flooded during the December 2010 rains and there was considerable flooding south of Pier Avenue and north of the project site in the North Beach Campground where both Meadow Creek and Pismo Creek contribute to flooding. City staff contacted the County regarding the project but received no comments or recommendations from the County.</p>
Caltrans-6	<p>The comment states that Caltrans should be consulted and provided with sufficient evidence to show that the proposed project's flow volume increases will not impact the highway or downstream properties. The City and project applicant have conferred with Caltrans throughout the comment period, and Caltrans has confirmed that the volume analysis contained in the Hydrology Addendum satisfies their concerns that the project would contribute to the existing hydrologic challenges in the area of Highway 1 and Meadow Creek. Caltrans reviewed the Hydrology Addendum and had no further comments on the project. <u>Caltrans will be further apprised of and consulted in regards to the proposed project revisions and findings of the January 19, 2012 revised Preliminary Hydrology Study.</u></p> <p>Please refer to Appendices <u>K and N</u> of the EIR for information regarding the calculation of flood detention on site consistent with City policies.</p>

# San Luis Obispo Council of Governments



Regional Transportation Planning Agency  
Metropolitan Planning Organization  
Census Data Affiliate/ Rideshare Program  
Service Authority for Freeways and Expressways

Arroyo Grande  
Arroyadero  
Grover Beach  
Morro Bay  
Paso Robles  
Pismo Beach  
San Luis Obispo  
San Luis Obispo County

Ronald De Carl, Executive Director

January 28, 2011

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reeris  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

RE: Grover Beach Lodge and Conference Center Draft EIR

Dear Mr. Buckingham,

Thank you for the opportunity to review the DEIR for the Grover Beach Lodge and Conference Center. As the Regional Transportation Planning Agency, SLOCOG works closely with Grover Beach and other jurisdictions to plan and fund regional transportation projects. SLOCOG understands that the Grover Beach Lodge and Conference Center will provide a significant regional benefit for tourism, linking the City and train station to the beach and visitor services. In addition SLOCOG commends the LEED Certification of the project. SLOCOG is concerned with the project impacts on State Route 1 and Highway 101 as well as impacts to local routes in Pismo Beach and Grover Beach. SLOCOG's 2010 Regional Transportation Plan recognizes that Transportation Demand Management (TDM) and non-motorized transportation infrastructure reduce vehicle demand. SLOCOG works to reduce demand on vehicle infrastructure through funding non-motorized infrastructure and through incentive programs provided by SLOCOG's Rideshare division. SLOCOG recommends incorporating several TDM and Non-motorized strategies into the mitigation measures in the manner shown below. SLOCOG also recommends establishing a developer-funded mechanism for implementing the TDM measures prior to construction.

1. Regarding: Greenhouse Gas Emissions and Adaptations (GHG) Impact 1, Operational Mitigation Measures. Please add the following, consistent with RTP policy:
  - Adequate long term bicycle storage (bike lockers). (RTP Policy NM-10)
  - Adequate short term bicycle parking (bike racks) at a ratio of 1 bike rack per 10 parking spaces (Non-Motorized Strategy 3)
  - Required enrollment in the iRideShare rewards program wherein the employer pays into a program that rewards non-Single Occupant drivers based on how often they do not drive alone to work (details available at [www.rideshare.org](http://www.rideshare.org))
2. Regarding: Transportation/Traffic (TC) impact 2 and TC Mitigation Measure (MM) 2. The language in TC MM 2 regarding striping, does not expressly include Class II bike lanes, which are part of the Grover Beach Bicycle Master Plan as well as consistent with the SLOCOG 2010 RTP and the stated LEED goal on page LS-4, "using alternative forms of access to the project site". Please include reference to Class II bike lanes as well as vehicular through lanes and center turn lane.
3. Regarding: page 4-165 the conference center is proposed to create 60 to 100 jobs at occupancy
  - SLOCOG TDM strategy 1.b. recommends "Major Employers" to "provide facilities to facilitate alternative modes of transportation for commuting, such as carpool and vanpool parking, secure bicycle parking, showers and lockers, bus benches, and shelters"

- SLOCOG TDM Strategy 1.i. recommends "major hotels and tourist attractions to enable public transportation, education, and marketing through schedule display and marketing." Please consider adding both of these strategies to TC Mitigation Measures

4. The project site is within both the California Coastal Trail and Juan Bautista de Anza Trail Corridors, as identified in the Regional Transportation Plan. SLOCOG 2010 RTP policy NM 6 recommends, "the development of boardwalks, Class I and II bikeways, and recreational trails that travel through and connect to scenic areas or other recreation destinations in both the Coastal Trail and Anza Trail Corridors." Please add language to ensure that both the California Coastal Trail and the Anza Trail Corridors are not precluded on the project site.

In addition to the TDM and non-motorized recommendations above, SLOCOG also recommends the following in order to reduce impacts in the City of Pismo Beach:

5. Regarding: TC Impacts 5-8, Significant, unavoidable, adverse impacts to several intersections in Pismo Beach: The City could reduce impact on Pismo Beach LOS at Price street and Highway 1 by working with Caltrans to install appropriate signage on US 101 to encourage travelers to use the 4<sup>th</sup> Street on/off ramps and direct traffic south on 4th Street to West Grand Avenue. Please add language to work with Caltrans to include signage at US 101 and 4th Street directing travelers to the City of Grover Beach and/or the facility.

SLOCOG-1

Finally, regarding Class I (significant, unavoidable, adverse) Transportation/Traffic impacts to intersections in the City of Pismo Beach, SLOCOG encourages the City of Grover Beach to act as a regional partner by requiring development pay for its fair share of mitigation of impacts for any areas outside the city limits. At this time there is no Regional Impact Fee program and SLOCOG is not acting in that capacity, however SLOCOG would be willing to work with the affected communities and developer to facilitate that discussion.

SLOCOG-7

Thank you again for the opportunity to review this Draft EIR. As a regional funding partner, SLOCOG seeks to ensure that projects minimize negative regional impacts and reflect healthy, sustainable, multimodal regional goals. If you have any questions about this letter, feel free to contact me at 805-781-5754 or Jessica Barry at 805-781-5764.

Sincerely,

SLOCOG-2

  
Richard Murphy  
Programming and Project Delivery Manager

SLOCOG-3

SLOCOG-4

**Response to Letter from San Luis Obispo Council of Governments, dated January 28, 2011**

Comment No.	Response
SLOCOG-1	<p>This comment introduces the San Luis Obispo Council of Governments's (SLOCOG) comments on Section 4.5, Greenhouse Gas Emissions and Adaptations, and Section 4.8, Transportation/Traffic, of the EIR. No further response is necessary.</p>
SLOCOG-2	<p>The comment discusses the Regional Transportation Plan's policies regarding GHG mitigation through increase in non-motorized transportation. The comment recommends inclusion of the following measures: adequate long-term bicycle storage; adequate short term bicycle parking at a ratio of one bike rack per ten parking spaces; and required enrollment in the iRideShare rewards program, wherein the employer pays into a program that rewards ridesharing.</p> <p>Mitigation measure GHG/mm-1, in Section 4.5.5, Greenhouse Gas Emissions and Adaptations – Project-Specific Impacts and Mitigation Measures, includes the following related measures:</p> <ul style="list-style-type: none"> <li>▪ The applicant shall demonstrate that measures have been included to promote ridesharing programs such as, but not necessarily including, publishing ridesharing information for all of the project employees, designating a certain percentage of parking spaces for ridesharing vehicles, designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and providing a web site or message board for coordinating rides.</li> <li>▪ The applicant shall demonstrate that measures have been included to provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience.</li> </ul> <p>These measures meet the requirements of RTP's Policy NM-10 by promoting bicycle parking at convenient locations and destination points. The need for long-term bicycle storage at the project site is not likely because of the short-term nature of visits to a hotel and tourist destination such as this one. Visitors to the lodge site will presumably be temporary guests at the lodge, and local residents who bike to and from the beach will not need long-term storage because they will be riding their bikes back to their houses.</p> <p>Although long-term bicycle storage lockers are not suitable for the proposed project, it is agreed that sufficient short-term bicycle parking, including bike racks, is appropriate for the project location and will be successful at encouraging non-motorized travel and recreational uses at the location. The project proposes a total of <del>393</del> <del>425-430</del> parking spaces, which would equate to about <del>403</del> bike racks under SLOCOG's preferred ratio of one bike rack per every 10 parking spaces. Because of the very large parking areas associated with the proposed project and public beach access, the proposed requirement for one bike rack per every ten parking spaces is not considered feasible or necessary for this location. The applicant will be required through existing mitigation measures to demonstrate adequate bicycle parking through the use of bike racks or other measures, consistent with the non-motorized transportation goals of the RTP. While the City recognizes the benefits of the iRideShare program, forced or required enrollment in the iRideShare program is not considered an appropriate mitigation measure for this project because of the numerous alternative measures included to promote ridesharing among project employees. Additionally, voluntary participation in the program is encouraged through existing mitigation measures to promote ridesharing.</p>

Comment No.	Response
SLOCOG-3	<p>The comment notes that TC Impact 2 and TC/mm-2 do not expressly include a reference to Class II bike lanes and recommends referencing bike lanes, vehicular through lanes and a center turn lane. The inclusion of a Class II bike lane along Grand Avenue will be a standard condition of approval for the project pursuant to the Grover Beach Master Bicycle Plan. Because it is a standard condition of approval, it is not necessary that the need be expressly stated in this EIR. Incidentally, TC Impact 2 and TC/mm-2 have also been deleted from the EIR as the Draft EIR originally overlooked the existence of a second westbound lane<sup>d</sup>. The project traffic engineer has confirmed that no additional center turn lane is necessary, eliminating the need for TC Impact 2 and TC/mm-2.</p> <p>Note that project design includes considerable access through the site and some of these pathways would be utilized by bikes, as appropriate. In addition, bike parking on State Park property would be under the purview of State Parks. State Parks is part of the JPA and would be in receipt of SLOCOG's comments regarding the need for bike parking.</p> <p>Due to deletion of TC Impact 2 and Mitigation Measure TC/mm-2, the remainder of the impacts and mitigation measures in the Transportation/Traffic section have been renumbered (e.g., TC Impact 3 becomes TC Impact 2, TC/mm-3 becomes TC/mm-2, etc.).</p>
SLOCOG-4	<p>The comment discusses the RTP's Transportation Demand Management Strategy 1(b) and recommends providing facilities to assist in the use of alternative modes of transportation for commuting, including carpool and vanpool parking, secure bicycle parking, showers and lockers, bus turnouts, benches and shelters. The EIR includes measures to encourage carpooling, vanpooling, and ridesharing, and provisions for the addition of adequate bicycle parking to promote cyclist safety and convenience (refer to Section 4.5.5, Greenhouse Gas Emissions and Adaptations – Project-Specific Impacts and Mitigation Measures). The project location also provides picnic areas, benches and various visitor serving opportunities within walking distance of the project location that would promote a reduction in vehicle trips. The project's location near the Grover Beach Amtrak Station and downtown bus stop facilitate the use of alternative modes of transportation for lodge employees and guests.</p> <p>The comment also addresses SLOCOG's TDM Strategy 1(i), which recommends that major hotels and tourist attractions enable public transportation, education, and marketing through schedule display and marketing. GHG/mm-1 provides measures intended to meet this strategy, by promoting the rideshare program and recommending the development of a website or message board for coordinating rides.</p>
SLOCOG-5	<p>The comment discusses the location of the California Coastal Trail and Juan Bautista de Anza Trail Corridors within the project location and recommends that language be added to ensure the trail corridors are not precluded at the project site. The project has been designed to enhance these trail corridors and walkability and connectivity at the project location, through the inclusion of multiple trails, connectivity pathways, and outdoor areas to encourage public recreational activities at the beach. The project connects to an existing boardwalk and walking trail that extends from the northwest corner of the project site into Pismo Beach. The proposed project would provide additional recreational facilities to the city by providing, in addition to the lodge and conference facility, considerable boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property. Because the project would enhance these trail corridors and trail connectivity throughout the project location and surrounding areas, no significant impacts to these trails would occur.</p>

Comment No.	Response
SLOCOG-6	<p>The comment recommends the use of signage on Highway 101 to reduce traffic-related impacts in Pismo Beach and encourage travelers to use the 4<sup>th</sup> Street on/off ramps and direct traffic south on 4<sup>th</sup> Street to access the Lodge facility. Although these measures could assist in directing traffic to 4<sup>th</sup> Street, the signage would create the potential for additional impacts along 4<sup>th</sup> Street and would not reduce the significant unavoidable impacts to Pismo Beach intersections as stated in the EIR. Both the City of Pismo Beach and the City of Grover Beach continually work with Caltrans to reduce significant traffic impacts to state highways. Note also that neither Caltrans nor the City of Pismo Beach commented on the potential adverse impacts to intersections in Pismo Beach.</p>
SLOCOG-7	<p>The comment recommends that the City of Grover Beach act as a regional partner by requiring the project developer to pay its fair share of mitigation of impacts for any areas outside of the Grover Beach city limits. It is noted that no regional impact fee program currently exists under which Grover Beach could require payment of such fees. The City has sought out the guidance and recommendation from the City of Pismo Beach related to potential traffic impacts occurring within Pismo Beach jurisdiction as a result of the proposed project. The City of Pismo Beach was consulted and invited to participate in and comment on the EIR process. No comments were received from the City of Pismo Beach during the public comment period or otherwise, and the City has indicated that it does not foresee the need to make improvements to these intersections at this time. Caltrans also declined to comment on traffic issues in the City of Pismo Beach.</p> <p>Therefore, a regional partnership does not appear to be feasible as it relates to the proposed project. The coordination of Pismo Beach and Grover Beach on future projects will continue to be encouraged and facilitated, at least to some extent, by the EIR process, until a regional fee share program can be implemented to better facilitate co-jurisdictional coordination on projects affecting areas outside of the permitting agency's jurisdiction.</p>

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY  
**CALIFORNIA COASTAL COMMISSION**  
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EDMUND G. BROWN, JR., Governor



received  
 2/11/11

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 Grover Beach Lodge and Conference Center DEIR  
 February 4, 2011  
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February 4, 2011

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

Subject: **Draft Environmental Impact Report (DEIR) for the Grover Beach Lodge and Conference Center, SCH #2010051002**

Dear Mr. Buckingham:

Thank you for forwarding the DEIR for the Grover Beach Lodge and Conference Center to our attention for input and comment. The proposed project would provide the City with a significant, visitor-serving facility and has the potential to greatly enhance the ability of visitors to access this valuable stretch of California's coast. As we have said previously, we are generally supportive of the proposed project in concept, as it could provide important visitor-serving overnight accommodations, recreational access improvements, and other resource enhancements. That said, and as we have long likewise indicated, such potential benefits must be addressed within the constraints of the site, and adjusted to avoid resource impacts that would be inconsistent with the Coastal Act and the City's certified local coastal program (LCP).

CCC-1

The standard of review for the proposed project is the City's LCP and the public access and recreation policies of the Coastal Act. In order for this project to be considered consistent with the City's LCP, some changes to the existing certified LCP will be necessary. The DEIR includes the proposed language for such an amendment to the LCP, which must be approved by the City, and then submitted to the Coastal Commission for certification. The standard of review for the land use plan amendment is the Coastal Act.

CCC-2

In summary, and as we have previously stated, it appears that the proposed project has not been adequately modified in light of the constraints present at this site. In fact, it continues to be too large in scale for the site and surrounding development, and the proposed siting, design, and scale of the project exacerbates many of the project's significant coastal resource impacts. First, the DEIR indicates that the proposed project would be in a floodplain and directly adjacent to the shoreline and would require shoreline protection to protect the project from future wave run-up. Such shoreline protection for new development cannot be found consistent with the LCP or the Coastal Act, and it is not clear if a reduced project size or a different design could obviate the need for such shoreline protection. Second, the proposed equestrian parking area in the vegetated dunes south of Grand Avenue is inconsistent with the LCP and would have significant and unallowable impacts on environmentally sensitive habitat areas (ESHAs). A reduced project size may improve the site design that would incorporate the equestrian parking to the area north of Grand Avenue. Third, the significant visual impacts of the project would be minimized with a

CCC-3

smaller scale project. And finally, the significant, unavoidable impacts to public access due to traffic congestion could be minimized or avoided through a smaller-scale project proposal. Because a reduced scale alternative has the potential to minimize or avoid all of these coastal resource impacts, comprehensive information about such an alternative must be provided in the EIR to allow for evaluation of the project and associated LCP amendment for consistency with the policies of the existing certified LCP and the Coastal Act.

CCC-3  
 (cont'd)

The proposed LCP amendment includes two components: (1) focused changes to the design guidelines for the proposed project; and (2) a comprehensive update to the existing LCP public works chapter. When submitting this amendment for certification by the Commission, the City will be required to submit information necessary for a thorough review of the proposed LCP amendment in light of the Chapter 3 policies of the Coastal Act. To the extent the City intends to use the DEIR process as a vehicle for developing some of this required information, we have included a preliminary review of the amendment and suggestions regarding what additional information will be necessary in order for the City to submit a complete LCP amendment package at a later date. We look forward to working closely with the City as it continues to develop this LCP amendment language and the materials necessary to allow its evaluation by the Commission.

CCC-4

Please consider the following:

**Biological Resources**

The proposed equestrian parking is located within the vegetated dunes south of Grand Avenue. As described in the DEIR, these dunes are habitat for several sensitive species and are considered ESHA. Further, the LCP protects this specific dune area, and prohibits any development within it. As we have stated previously, development in this area is inconsistent with the LCP and the Coastal Act, and therefore, the City should not continue to consider development that impacts this ESHA any further, and the preferred project should not provide for any development south of Grand Avenue.

CCC-5

In addition, the new RV dump station would be directly adjacent to wetlands. The City should not make any decisions about this portion of the proposed project without additional information, developed in the EIR or otherwise, that provides detailed biological information and a wetlands delineation for this project area to allow for evaluation of this project component for consistency with the LCP. Further, should wetland impacts and/or inappropriate buffer space be associated with any preferred options, the EIR should provide information about alternative locations for this development that would not adversely impact wetlands or sensitive habitat, or their associated buffer areas.

CCC-6

**Hazards**

The project site is in the 100-year floodplain adjacent to Meadow Creek and directly adjacent to the dunes and shoreline. The shoreline erosion analysis in the DEIR is not adequate to evaluate

CCC-7

Grover Beach Lodge DEIR comment letter Z.4.11

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the project for consistency with the LCP. It should be revised to include information on shoreline erosion rates (both long-term and seasonal), current high water levels, waves and sea level rise. To determine the safety of the site, the EIR should examine the site and determine the likely inland-most location of the shoreline over the life of the structure. This is normally the erosion that could occur over the full life of the structure plus the seasonal erosion that occurs throughout the year.

The DEIR assumes some new shoreline protection will be necessary for the project, but does not identify the location or design of the needed protection. The DEIR must provide this information to allow for a complete evaluation of the project. Further, because shoreline protection is prohibited by the LCP, except in cases where it would protect existing structures or beaches in danger of erosion, the EIR must provide details about a project alternative that would not rely on such shoreline protection. A reduced scale alternative, located on a portion of the site that would not be impacted by erosion over the life of the project, may be necessary to make such a project possible. In addition, the project should include an evaluation of managed retreat options, where parts of the building are removed as they become threatened by erosion over the long term.

**Visual Resources**

The proposed project is located in a visually sensitive area along the immediate dune shoreline; one that is visible from Highway 1 and other major public view corridors, including from the beach itself, Grand Avenue, and the dune boardwalk. As we have stated previously, the EIR should include an evaluation of the visual impacts of multiple reduced project alternatives, including at least one alternative that is of size and scope to meet existing LCP requirements in this respect. Other alternatives should include a reduced number and reduced size/scale of proposed buildings, a reorientation of buildings to cluster them away from primary viewsheds and the beach, and a dispersed option that may include a series of smaller buildings. The information in the EIR should include a full visual analysis of these alternatives using photo simulations and renderings, to allow for analysis of the project's consistency with the certified LCP and the Coastal Act. We understand and support the primary design premise of bringing the dunes and the natural environment into the site and the development, and we believe that this aesthetic can work well at this location, but we are concerned that the scale proposed will overwhelm the ability of the site to adequately function in this way. Therefore, the EIR should provide information about the visual impacts of a range of alternatives, including a reduced-scale alternative.

**Public Access and Recreation**

The proposed project is located seaward of the first public road and thus it must be consistent with the certified LCP as well as the Public Access and Recreation provisions of the Coastal Act. The Coastal Act requires that lower cost visitor and recreational facilities be protected, encouraged, and where feasible, provided. Developments providing public recreational opportunities are preferred. The Act also requires that visitor-serving commercial recreational

CCC-7  
(cont'd)

CCC-8

CCC-9

CCC-10

CCC-11

facilities have priority over other land uses on suitable sites. Thus, as we have discussed previously, it will be critical that the EIR fully evaluate the ways in which this project provides or could provide for low cost visitor serving opportunities, including low cost overnight accommodations, and the way in which it relates to the provision of such facilities in the area, so that a full range of such visitor serving opportunities area-wide, including lodging opportunities, can be provided. This evaluation should at a minimum document the range of low cost opportunities in the area and the way in which this project fits into that range. As discussed, to the extent necessary to meet Coastal Act and LCP tests, it may be necessary to incorporate low cost features (including low cost overnight accommodations) into the project, and/or to provide an in lieu fee to offset inconsistencies between the project and existing requirements to provide low cost accommodations. In addition, the EIR should evaluate how such facilities and/or fees would affect the overall project.

In addition, the proposed project would create multiple, significant impacts on traffic congestion in the area, several of which may not be able to be mitigated. To be consistent with the LCP and the Coastal Act, the project must protect existing public access to the coast, which, at this location, relies heavily of vehicle access via Highway 1. Therefore, the EIR should provide information about alternative projects and project designs that would reduce the traffic congestion impacts that would be caused by the proposed project. Such alternative projects may include the reduced-scale alternative discussed throughout this letter, as well as a project that incorporates more measures to reduce the number of vehicle trips generated by the project, such as increased connectivity to public transportation and other alternative modes of transportation.

Finally, according to the LCP, the parking lots at this site provide free beach parking and are at or beyond capacity during peak use. The EIR should provide information about what the impacts would be to the existing parking availability for beachgoers who do not wish to use the lodge facilities. In addition, the EIR should provide information about how those impacts could be mitigated.

**LCP Amendment**

As discussed above, the City must provide adequate information to provide for an analysis of the consistency of the LCP amendment with the Coastal Act when it submits the amendment for certification by the Commission. The information necessary for this analysis may or may not be included in the subject EIR, but it must be provided as part of any City amendment submittal. The following comments are general comments on the amendment and the issues it raises, and are being provided as preliminary feedback. The information that the City provides in response to these comments may lead to additional recommendations for changes to the proposed LCP amendment and/or requests for different information in order to allow such a submittal to be properly filed and brought to the Commission for hearing. We look forward to working with the City as the amendment progresses through the City's approval process, including to identify information gaps and filing needs, as well as to help the City with LCP language suggestions.

CCC-11  
(cont'd)

CCC-12

CCC-13

CCC-14

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**Public Access and Recreation Component.** The proposed amendments to the public access and recreation component make changes to the conceptual site plan and design guidelines that are in the LCP to accommodate the proposed lodge and conference center. These changes, and the development itself, including its size and scale must be analyzed for consistency with the Coastal Act. In terms of public access and recreation, the City should analyze whether the proposed project provides for maximum public access. Such an analysis should consider the negative impacts of the project to public access, such as increased vehicle congestion, as well as a review of whether the project could go farther to provide lower cost visitor serving amenities. In addition, the analysis should include a review of the biological resources on the site, and an evaluation of whether these resources would be protected by the project's design, as required in the Coastal Act. The analysis should also look at the existing hazards from flooding and wave run-up, and evaluate the project for consistency with the hazards policies of the Coastal Act, including 30235 and 30253. And finally, the analysis should include an evaluation of the visual resources in the area and the visual impacts of the project. The comments above are instructive on this point, and are incorporated herein by reference.

Given the significant constraints on this site, after performing this Coastal Act analysis, the City may find it necessary to change some of the proposed project design. We recommend that the proposal also be amended so that the language of the LCP will acknowledge the constraints on the site and ensure protection of coastal resources in whatever ultimate project design is chosen. We also recommend that the language is clarified to indicate that the existing and proposed design requirements serve as maximum design requirements, and that a smaller and/or different project may be necessary to accommodate the site resource constraints.

**Public Works Component.** The proposed amendment includes a comprehensive update to the public works component of the certified LCP. There is extensive background information included about the status of water resources and public works infrastructure. There are also new proposed policies to protect public works capacity for Coastal Act priority uses.

The City should provide the documentation to support the background information in the proposal. Please also include the methodology and information about the City's build out and public works demand projections. The term 'build out' should be used to describe the ultimate demand for services based on the number of residential and transient units, in addition to commercial and industrial development that could be permitted consistent with the LCP. Such build out is constrained not only by zoning restrictions, but also by limitations on development that would be required to protect coastal resources, including biological resources, public access and availability of public works capacity. In other words, LCP consistent build out is not a rote arithmetic exercise based on multiplying acreages by maximum allowed development. Rather, LCP consistent build out figures would use the amount of development allowed by the current zoning standards as a starting point, but would be reduced in a way so that all development within the figures would be consistent with the LCP, taking into account coastal resource constraints such as avoidance of wetlands and ESHA, avoidance of significant public view blockage, etc.

CCC-15

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The City should also provide information supporting the availability of water supplies and the location, use and capacity of the existing public and private wells. Please provide any hydrological reports on the health of the aquifer and other water supplies. Although the City may be entitled to a certain quantity of groundwater according to previous Court adjudication, the public works section of the LCP must rely on information about the actual availability of water supplies. This type of information about groundwater resources may also inform the development of appropriate policies to address existing private wells in the City. Because the City is almost entirely urban, it should generally be served by public utilities. Please consider what limitations on new private wells or the repair or replacement of existing wells may be appropriate given the resource limitations and the need to supply existing agricultural uses.

The proposed section on circulation refers to the design capacity of the City's major access roads, but does include information about the existing level of service, or a proposed acceptable level of service. In order to guide new development to ensure public access to the coast is protected, enhanced, and maximized consistent with the LCP and the Coastal Act, it is likely that LOS criteria should be included in these policies. Such LOS criteria should address traffic during peak commuter as well as peak recreational periods, such as Saturday afternoon. Further, depending on existing and projected traffic congestion, it may be necessary to include policies requiring new projects to mitigate congestion impacts, including through the use of transportation demand management measures.

Finally, depending in part on the nature of the requested information about the status of water, sewer, and road capacity, the public works component should be understood within a context based on the sustainable use of these resources. Policies should address the feasibility and demand for reclaimed water, especially in uses such as agriculture and irrigation (e.g., golf course, municipal landscaping, etc.); additional requirements for new and improved water conservation measures; and increased availability of public transportation including requirements for new development to provide for a share of public transportation funding and/or improvements. In addition, the LCP should not cross-reference the policies of the City's Water Master Plan and/or Urban Water Management Plan, unless these documents are intended to be incorporated into the LCP. If they are incorporated into the LCP, any changes to them will need to be certified by the Commission. If they are not incorporated into the LCP, it may be appropriate to state some of their existing policies into this component of the LCP.

**Conclusion**

We have identified several major constraints at the project site that have not been adequately addressed in the DEIR or otherwise. We strongly recommend that these issues be adequately addressed in the final EIR or a revised and re-circulated DEIR to allow for a complete analysis of the proposed project for consistency with the certified LCP and the Coastal Act. With regard to the LCP amendment, we look forward to receiving the additional information and analysis requested in this letter, and to working with the City in developing an LCP amendment that is

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consistent with the Coastal Act. If you have any questions or concerns about this letter, please contact me at (831) 427-4863.

CCC-26  
(cont'd)

Sincerely,



Madeline Cavalieri  
Coastal Planner

**Response to Letter from California Coastal Commission, dated February 4, 2011**

Comment No.	Response
CCC-1	This comment introduces the Coastal Commission's (CCC) comments on the proposed project and discusses the Commission's general support of the project concept as well as its concern that the project avoids inconsistencies with the LCP and Coastal Act. No further response is necessary.
CCC-2	This comment indicates that the standard for review for the proposed project is the City's LCP. It is noted that the City is proposing amendments to access and recreation policies in the LCP. The proposed amendments would be approved by the City and then submitted to the Coastal Commission for approval. The standard of review for the amendments would be the Coastal Act. No further response is necessary.
CCC-3	This comment summarizes the CCC's comments on the proposed project set forth in more detail in later portions of the letter, including comments related to the project's size and scale, location in a floodplain, wave run-up issues, impacts to ESHAs at the proposed equestrian parking area, visual impacts, and traffic congestion impacts. The comment states that a smaller-scale project would have the potential to minimize or avoid all of these potential coastal resource impacts, and recommends that such an alternative be analyzed in the EIR. Because this comment only provides a summary of these issues, which are discussed in more detail in the following sections, no further response is necessary. Please refer to the responses to comment CCC-4 through CCC-13, below, for additional information.
CCC-4	This comment summarizes the CCC's comments regarding the proposed LCP amendment. The comment states that additional information will be necessary for a thorough review of the proposed LCP amendment, and that the CCC looks forward to working with the City through the amendment process. Because this comment only provides an introduction and summary of the comments related to the proposed LCP amendment discussed in more detail in the following sections, no further response is necessary. Please refer to the responses to Comments CCC-15 through CCC-25 below, for additional information.
CCC-5	This comment states that the proposed equestrian parking area south of Grand Avenue is located within vegetated dunes that serve as habitat for several sensitive species and could be considered ESHA. The comment further points out that the LCP specifically protects this dune area and prohibits any development within it. The EIR recognized that placing the equestrian parking in this location would potentially create significant unavoidable impacts to potential ESHAs and violate LCP policies (refer to BIO Impacts 1 through 7 in Section 4.3.6, Biological Resources – Project-Specific Impacts and Mitigation Measures, of the EIR). Therefore, the EIR recommended an environmentally superior alternative location for such parking within the large parking area designated for public and lodge uses at the southeastern corner of the project area. As discussed in Chapter 5, Alternatives Analysis, of the EIR, impacts would be minimal at this alternative location and would not lead to impacts on dune vegetation or potential ESHA. The EIR recommends an environmentally superior alternative that includes relocating the equestrian parking area to the north side of Grand Avenue and out of potential ESHA in compliance with CEQA. No other project components are proposed south of Grand Avenue.
CCC-6	The comment recommends that the City not make any decisions regarding the proposed RV dump station until additional biological information and a wetland delineation is provided to allow evaluation of the project for consistency with the LCP. The EIR includes a preliminary analysis that identifies a 0.061-acre area adjacent to the proposed RV dump station expansion as potential wetlands. However, the State Park

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	<p>campground has already been significantly altered, and this area is currently routinely mowed as part of campground maintenance. As proposed, the expansion of the existing dump station would disturb a very small portion of known parameter wetlands, although this area does not appear to have existing connectivity to Meadow Creek.</p> <p>An alternative would be to redesign the proposed dump station expansion to avoid the area of known parameter wetlands. A figure has been included in the FEIAR that depicts the area of known parameter wetlands and the dump station redesign that avoids this area. SWCA biologists have visited the site and determined that new areas of disturbance identified in the redesigned RV dump station do not support significant coverage of wetland species or other wetland indicators. Since there is a lack of wetland indicators in the new disturbance areas, the redesigned project would avoid impacts to wetlands.</p> <p>Since there appears to be sufficient space to accommodate a modified project design, BIO/mm-21 has been modified to recommend avoidance of the 0.061 acres of wetland disturbance as follows:</p> <p>“BIO/mm-21 Prior to issuance of a grading permit for Area D to expand the North Beach Campground RV Dump Station, the applicant shall redesign the dump station layout and proposed improvements to avoid take of any wetland areas as shown in Figure 4.3-2.”</p> <p>The proposed dump station expansion would require issuance of a coastal development permit from the City of Pismo Beach. The EIR has been amended to reflect Pismo Beach as a responsible agency for this action.</p>
CCC-7	<p>This comment questions the safety of the project site in relation to the 100-year floodplain and shoreline erosion. The comment states that the shoreline erosion analysis in the EIR is not adequate to evaluate project consistency with the LCP, and recommends revisions to include information on shoreline erosion rates, current high water levels, waves, and sea level rise. The CCC has recommended that the EIR determine the likely inland-most location of the shoreline over the lifetime of the structure, and provide details as to the location and design of any proposed shoreline protection components.</p> <p><i>According to the shoreline study completed by the CCC in 2001 (Overview of Sea Level Rise and Some Implications for Coastal California), “by 2100, it is very likely that water levels will be 3 feet higher than they are currently.” The same CCC study states that as a general rule of thumb, between 50 and 100 feet of beach width on a gently sloping beach would be lost for every foot of sea level rise (CCC 2001). Therefore, based on the CCC’s own report, it can be estimated for this project that approximately 150-300 feet of beach from the mean high high water line may be affected by sea level rise by 2100 (and within the lifetime of the structure). The same amount of sea level rise would result in less than 150-300 feet of beach loss on a moderately or steeply sloping beach.</i></p> <p><i>More specifically, the CCC report shows that Port San Luis experienced approximately 1.5 mm/yr of sea level rise between 1945 and 1993 for a total of 72 mm (0.24 feet) over 48 years (CCC 2001, Figure 4). Therefore, Port San Luis has experienced sea level rise of approximately 0.005 feet per year since 1945. Using this rate, sea level rise at Port San Luis from existing conditions would be approximately 0.445 feet in 2100 (0.005 x 89 years). Specific information for Port San Luis shows a lower sea level rise than that estimated by the CCC report.</i></p> <p>In the <u>Final EIR</u>, GeoSolutions used the USGS Coastal Vulnerability Assessment for Santa Barbara’s estimates and the National Oceanic and Atmospheric Administration’s estimates for sea level rise as the background for its wave run-up study. The study conservatively estimated one foot of sea level rise by 2100 (refer to Section 4.6.1.2, Hydrology and Water Quality – Flooding and Drainage, and Appendix K of the EIR). According to the CCC study, this would only result in 50 to 100 feet of beach loss in this area. Please refer to Appendix K for the wave run-up analysis, excerpts from various sources including elevation maps.</p>

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	<p><u>Based on additional comments received by the CCC, the project applicant has requested that GeoSolutions revise the original Wave Runup Study to include a 4.6 foot sea level rise. The revised report calculated a worst case high stillwater elevation of 9.24 feet as follows: mean high high water (MHHW) of 5.32 feet + 2.33 maximum water level above MHHW + 4.6 sea level rise = 9.24 feet. The revised Wave Runup Study has been added to Appendix N of the Revised Final EIR. The approximate low elevation at the site is 9 feet and below the estimated stillwater elevation. However, the report has determined that the low elevation in the dune complex that separates the project site from the Pacific Ocean to be 18.2 feet. Therefore, the dune complex would appear to be of sufficient height to deter a worst case estimate of 4.6 foot sea level rise. The report also estimates a 7.5 foot potential wave run-up, which would result in potential run-up to 16.74 (9.24 worst case stillwater elevation + 7.5). The low elevation of the dune complex adjacent to the project site would also be of sufficient height to deter the estimated wave run-up.</u></p> <p><del>Most recently, the Pacific Institute conducted an in-depth analysis of sea-level rise on the California coastline in 2009. The report, <i>The Impacts of Sea-Level Rise on the California Coast</i>, estimated between a 1.0 and 1.4 meter (3.28 to 4.6 feet) rise in sea levels in California by 2100. The full report can be found at <a href="http://www.pacinst.org/reports/sea_level_rise/">http://www.pacinst.org/reports/sea_level_rise/</a>.</del></p> <p><del>The EIR used the most conservative estimate of 4.6 feet in sea level rise, based on the Pacific Institute report as well as consistent results of a County study on climate change funded by a grant from the Local Government Commission. The EIR found that wave run up could potentially occur in Areas A and B through a low point in the dune complex located adjacent to the existing beach viewing deck and picnic area. Mitigation was proposed to reduce this impact, including construction of a dune or other obstacle to deter wave run up and associated dune erosion. The conclusions of the revised Wave Runup Study conclude that this measure is no longer necessary, as the low elevation in the dune complex is higher than previously estimated. The project refers to an existing low sea wall in this area (refer to Section 4.6, Hydrology and Water Quality) that could be extended and/or heightened to provide additional wave run-up protection. The CCC has stated that this is not an allowable use for new development.</del></p> <p><del>Even without construction of any type of barrier, the Pacific Institute and CCC reports on sea level rise would indicate that the potential for impacts on the proposed project would not be likely. The westernmost point of the proposed project boundary is located approximately 430 feet from the mean high high water line (MHHW) and does not affect the existing dune structures or the shoreline. The first proposed structure is located approximately 630 feet inland of the MHHW. This is well beyond the CCC's estimated zone of disturbance (between 150 and 300 feet). The revised Wave Runup Study and Pacific Institute also indicates a potential 4.6 foot sea-level rise along the coast. Based on tide data calculated by NOAA between 1983 and 2001, the MHHW line at Port San Luis is at about 1.6 meters. GPS data indicates that the dune complex located between the proposed project and the ocean is of sufficient height to block a 4.6 foot rise in sea levels. Maps prepared by the Pacific Institute to demonstrate impacts of sea-level rise along the California coast indicate that no portion of the project site would be impacted by the estimated 4.6 foot sea level rise scenario (Refer to California Flood Risk: Sea Level Rise, Pismo Beach Quadrangle Map, available at: <a href="http://www.pacinst.org/reports/sea_level_rise/hazmaps.html">http://www.pacinst.org/reports/sea_level_rise/hazmaps.html</a>).</del></p> <p><del>A figure has been added to the EIR that shows the potential run-up area based on the CCC report (between 150 and 300 feet of beach loss) and the approximate MHHW line after a 3 foot sea-level rise (estimated by the CCC) and a worst case 5 foot sea-level rise (4.6 feet estimated by the revised GeoSolutions report and Pacific Institute). The project site is situated approximately 360 additional feet inland from the estimated MHHW after a 5 foot rise in sea levels. Safety at the project site does not appear to be an issue due to the distance from the shore.</del></p> <p><del>Since determination of erosion 50 years into the future is speculative at best, the worst-case wave run-up was used in the EIR (4.6 foot increase in sea level 7.5 feet, resulting in a worst case run-up elevation of 16.74 feet). The CCC, in the 2001 report, estimates a 3 foot rise. If a 3 foot rise is used, then the wave run up would be adjusted to an elevation of 15.74 feet, which is less than the elevation of the drainage that was of concern. Under this analysis, a dune, landscape berm or other improvement (as opposed to extension of the existing sea wall) would not be</del></p>

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	<p>necessary. At 165.74 feet wave run-up, water would not likely encroach into the project area.</p> <p>Using Coastal Commission numbers, the impact would be less significant and DES/mm-7 would not be necessary. Taking a more conservative approach, DES/mm-7 has been amended to remove the mention of the existing sea wall, as follows:</p> <p>“Prior to issuance of a grading permit for Area B, the City shall review wave run-up information and determine the elevations along the periphery of Area B to ensure that measures are in place to deter wave run-up into Area A. If necessary, a constructed dune, landscape berm, or other method to deter wave run-up and associated dune erosion shall be designed by the applicant and approved by the City. Sea level rise shall either be the worst case estimate of 16.74 feet or at an elevation that has been accepted by the State or County of San Luis Obispo for the life of the concession (50 years). A figure showing the project location, the mean high high water line, the expected area of sea level rise based on the CCC’s <i>Overview of Sea Level Rise</i> report has been added to the EIR (refer to Section 4.6, Hydrology and Water Quality).</p>
CCC-8	<p>This comment points out that shoreline protection is prohibited by the LCP except in cases where it would protect existing structures or beaches in danger of erosion, and states that a project alternative that would not rely on any shoreline protection must be analyzed.</p> <p><u>Based on the revised GeoSolutions Wave Runup Report (2012), it has been determined that the low elevation of the dune complex would be of sufficient height to block any water from entering the site after calculation of the worst case 4.6 foot sea level rise and 7.5 wave run-up.</u> Given the CCC estimate of 3 foot sea level rise in this area, and using CCC estimates, the potential for wave run-up to encroach into the small depression located just north of the existing State Park overlook is not likely (refer to the response to Comment No. CCC-7, above, and Figure 4.6-3, added to Section 4.6, Hydrology and Water Quality). There would be no need for any “sea wall” or blockage to deter nuisance damages onto the site and the reference to the existing sea wall has been removed from the EIR. Based on site elevations generated through onsite field reconnaissance and GIS mapping, the Pacific Institute’s estimated 4.6 foot sea-level rise would result in a MHHW line that would extend no closer than approximately 360 feet from the westernmost project boundary (refer to Figure 4.6-3). Because of the distance from the shore, the proposed project is not in danger of erosion from climate change or sea level rise.</p>
CCC-9	<p>The comment recommends that the EIR address managed retreat options, where parts of the building are removed as they become threatened by erosion over the long term. The EIR did not identify any significant impacts that would warrant a reduced scale alternative. Shoreline protection is not necessary for this project. Managed retreat options are not necessary since <u>the existing dune complex is of sufficient height to block sea water from entering the site and</u> there is an approximately 330-foot buffer between the worst-case sea level rise estimates and the most seaward proposed structures. Refer to the responses to CCC-7 and CCC-8, above, and Figure 4.6-3 in Section 4.6, Hydrology and Water Quality.</p>
CCC-10	<p>This comment discusses the visual impacts associated with the proposed project, and recommends various project alternative be analyzed to evaluate visual impacts, including multiple reduced scale alternatives, alternatives utilizing reorientation and/or clustering of the buildings, and a dispersed option that may include a series of smaller buildings. The comment requests full visual analysis of these alternatives, including photo simulations and renderings.</p> <p>Section 4.1, Aesthetic Resources, of the EIR analyzed potential visual impacts associated with the proposed project and found that the project, as designed, would be consistent with a resort-style project of this type in a semi-urban setting. The design of the structures effectively utilizes a great deal of form and surface articulation in order to reduce the overall perceived scale and visual mass of the buildings. The building heights</p>

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	<p>would not exceed the City zoning standard, and the scale of the structures would not be uncharacteristic of many hotel and resorts in other urban/beach settings. The proposed LCP amendment would modify the existing height requirements to be consistent with the proposed project design. <u>Project revisions proposed since the July 21, 2011 Planning Commission hearing have reduced the size and scale of Building 1 by detaching the conference center. The Building 1 footprint has been reduced from 31,579 to 25,920 square feet, or an 18% reduction, which reduces the size, scale and bulk of the building especially when viewed from the public plaza area. Further, the addition of a detached conference center (Building 4) helps re-orient the cluster of buildings away from the beach and primary viewshed areas.</u></p> <p>The site layout, placing most of the urbanizing features (such as buildings and parking lots) on the eastern portion of the site near other existing development, and the less intense uses (such as paths, picnic and open areas) closer to the beach, creates an appropriate transition from the natural setting of the beach to the built areas. The EIR also proposes measures for undergrounding of all existing and planned utility lines along West Grand Avenue.</p> <p>The EIR did not identify any impacts that could not be mitigated to a level of insignificance through implemented design features and recommended mitigation measures. Therefore, the threshold for justifying the need for a smaller scale project was not met and no smaller scale alternatives were considered. Although it is correct that a smaller scale project would reduce visual impacts, the EIR didn't conclude that any significant impacts would result from the proposed project design necessitating a reduction in scale. Even a smaller project would be visible from Highway 1, the beach, Grand Avenue, and the dune boardwalk, and would also increase vehicle trips, and be subject to the need to raise the buildings above flood levels consistent with City standards. The project meets many Coastal Act policies regarding public access to the beach and the higher number of rooms helps to keep costs down. There is no justification under CEQA to recommend a smaller scale project.</p>
CCC-11	<p>This comment discusses the provisions of the Coastal Act that require lower cost visitor-serving and recreational facilities within the Coastal Zone. The comment notes that developments providing public recreational opportunities and visitor-serving commercial recreational facilities have priority over other land uses on suitable sites. Note that the project does not endanger the existing lower cost visitor-serving uses in the State Park, but rather provides for all income levels by increasing moderate cost hotel facilities and a conference center within the State Park system. Facilities of this economic category are sorely needed in Grover Beach, which has lower cost hotel rooms, RV Parks, and campgrounds, but <u>no</u> moderate cost beachfront hotel rooms. This project supports the concept that a "full range" of facilities be provided. Please refer to the economic study prepared for the City by Keysar Marsten that discusses the need for a facility such as the proposed project in Grover Beach. Also note that the provision of in lieu fees and the cost of hotel rooms is not generally an EIR issue, but rather a Coastal Act issue.</p>
CCC-12	<p>This comment relates to multiple, significant impacts on traffic congestion in the area, particularly along Highway 1, several of which may not be able to be mitigated. The project would add 20 peak hour trips to the two impacted Pismo Beach intersections, or one additional vehicle every three minutes. Any development along Highway 1 within the City of Pismo Beach would exacerbate the LOS F conditions at the two Pismo Beach intersections. The LOS F at the Highway 1/Ocean View intersection stems from traffic congestion entering Highway 1 from Ocean View, not traffic flows along Highway 1. Pismo Beach declined to comment on the EIR and has indicated that it does not foresee the need to make improvements to the two intersections in connection with the proposed project and Caltrans similarly did not comment on the traffic impacts at these two intersections.</p>
CCC-13	<p>The comment states that the site currently provides free beach parking that is at or beyond capacity during peak hours and questions the impacts</p>

Comment No.	Response
	<p>to the existing parking availability for beachgoers that do not wish to use the lodge facilities.</p> <p>The project proposes that all parking be free parking. Parking does not appear to be at or beyond capacity unless this comment disregards the large dirt overflow parking area and refers to paved beach parking only. All site visits conducted during the preparation of the EIR have viewed the site parking as very adequate and there have been empty striped spaces in addition to unpaved overflow parking spaces. The JPA has determined that the proposed project must retain the existing parking (160 spaces) in addition to the proposed hotel parking (233<del>55</del> spaces) in accordance with LCP §5.7 Public Access Recommendations, A.2(a), which requires 160 public parking spaces at this location. Please refer to Table 2-1 in Chapter 2, Project Description, that indicates the total number of spaces to be provided for public, all concessions, and equestrian parking. The 233<del>55</del> proposed Lodge parking spaces exceed the City’s parking requirement for hotels, and the City has determined that the proposed number of parking spaces shown on the project plans is adequate to meet all user needs based on city and State Parks parking requirements.</p> <p>However, the traffic engineer, Omni-Means has indicated that the proposed parking plan is poorly designed with several dead end parking areas. <u>The proposed project revisions have reduced these impacts to a large extent, but</u> the EIR includes mitigation measures specifying that the parking lots should be redesigned to allow for flow between the lots and to reconfigure the parking to incorporate equestrian parking and to maximize parking on site. To clarify Coastal Commission concerns, mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR) has been amended to read as follows:</p> <p>“Prior to issuance of a grading permit for Area A, the circulation parking patterns shall be reviewed and approved by the City to improve ingress and egress between the individual parking areas in Area A, to allow turn-around space in each parking area to avoid vehicles from having to back up to turn around or exit the lots or Grand Avenue, and to maximize parking onsite.”</p>
CCC-14	<p>This comment summarized the CCC’s comments regarding the proposed LCP amendment. The comment states that additional information will be necessary for a thorough review of the proposed LCP amendment, and that the CCC looks forward to working with the City through the amendment process. Because this comment only provides an introduction and summary of the comments related to the proposed LCP amendment discussed in more detail in the following sections, no further response is necessary. Please refer to the responses to Comments CCC-15 through CCC-25, below, for additional information.</p>
CCC-15	<p>The comment discusses proposed changes to the public access and recreation component of the LCP, and expresses concerns regarding consistency of the proposed amendment with the Coastal Act. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application.</p> <p>The EIR acknowledges that all mitigation measures would be incorporated into the environmentally superior alternative, including measures related to redesign of the parking areas to accommodate parking for all users of the area, including RV users, equestrians, bicyclists, pedestrians, beachgoers, hotel guests, conference center guests, employees, golfers, etc. TC/mm-2 (TC/mm-3 in the Draft EIR) has been amended to provide for maximization of parking in the redesign of the parking areas. Refer to the response to CCC-13, above.</p>
CCC-16	<p>The comment states that the LCP amendment application should consider biological resources and include an evaluation of whether or not these resources would be protected by the project’s design guidelines set forth in the proposed amendment. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application.</p>

Comment No.	Response
CCC-17	This comment states that the LCP amendment application should consider flooding and wave run-up hazards, and evaluate the amendment for consistency with relevant Coastal Act policies. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. Refer also to the response to CCC-7, above.
CCC-18	This comment states that the LCP amendment application should consider visual resources and include an evaluation of whether or not these resources would be protected by the LCP amendment as it relates to the proposed project. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. Refer also to the response to CCC-10, above.
CCC-19	The CCC states that the City may need to make some changes to the proposed project design given the significant constraints on the site. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. Refer also to the responses to CCC-4 through CCC-13, above.
CCC-20	The comment discusses the need for the language of the LCP amendment to acknowledge the constraints on the project site and ensure protection of coastal resources in whatever ultimate project design is chosen. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. It should be noted that the EIR recommends an environmentally superior alternative that moves the equestrian parking to the north side of West Grand Avenue in order to avoid <u>potential</u> ESHA.
CCC-21	<p>The comment recommends that the LCP amendment language be clarified to indicate that the existing and proposed design requirements serve as maximum design requirements, and that a smaller and/or different project may be necessary to accommodate resource constraints at the site.</p> <p>None of the impacts identified for the project indicate the need to reduce the size of the project. The significant unavoidable impacts identified for the project include traffic impacts at two intersections in Pismo Beach that are currently at design capacity. These intersections are located a moderate distance away from the project site and the City of Pismo Beach has indicated that it does not want to pursue improvements to the intersections at this time. The City of Grover Beach and the City of Pismo Beach have discussed the two intersections and the City of Pismo Beach does not wish to pursue any in lieu fees for intersection improvements; Pismo Beach does not plan to improve these intersections in the near future and Caltrans similarly declined to comment on the potential adverse impacts on these two intersections. Reducing the size of the project will not lessen the impacts to these intersections since the number of trips allocated to these two intersections is relatively small and would not substantially decrease with a smaller scale development.</p> <p>Visual Resources evaluation does not indicate that a reduction in size and scale of the buildings would reduce visual impacts. It is impossible to hide this development from view, and the buildings would be seen from all surrounding areas regardless of size. Actually, in the public perception, the availability of such a pleasing development at this entrance to the State Park would be viewed as an improvement to the view and a potential visual enjoyment of a pleasing place to visit.</p> <p>Please refer to the visual simulations in the visual impact section, specifically Figures 4.1-15 and 4.1-16 that show the proposed project from the boardwalk view and the beach view. The existing views show palm trees located off the project site within the RV park. These palm trees are seen from the beach and are taller than the buildings, which show scale. The palm trees are visible even though the hotel buildings are placed</p>

Comment No.	Response
	<p>on the project site. Reducing the size of the buildings or moving them back on the lot isn't going to result in a significant reduction in the visibility of the buildings. In addition, the buildings mimic the scale of the buildings along Highway 1 and are consistent with the viewer's perception of urban development at the intersection of Grand Avenue and Highway 1.</p> <p>The reference to the Asilomar Lodge in the JPA and Coastal Act documents is vague. Recent visits to Asilomar by the EIR team and a guided tour of the facilities by a park ranger emphasized the Asilomar architecture as varied and representative of the various architects who designed the buildings. Emphasis was placed on the ability to provide large modern-designed buildings adjacent to the beach using building materials to blend in with the coastal surroundings. These same techniques have been requested by State Parks for this site. Variations of design materials could be used based on the individual requests of the JPA and Coastal Commission through review of the building designs once designs are in final stages. Aesthetically, if the proposals are followed as specified in the project description and the mitigation measures in the EIR, the project would conform to the use of natural colors and materials consistent with the coastline character at the West Grand Avenue entrance to the Vehicular Recreation Area, the entrance to the Pismo Beach State Park and the North Beach Campground, while still providing much needed moderately priced hotel space and conference facilities that pay for themselves and possibly derive a small profit for the State Park system.</p> <p>Note that there is a trade-off with the provision of hotel and conference facilities and the size of the buildings. The project must provide revenue for the concessionaire and State Parks in order to be a viable project. Reducing the number of rooms or the conference facilities would not be viable. The amenities required by the project could not be provided with a smaller project due to cost. There is no nexus in terms of environmental impacts per CEQA Guidelines at Appendix G to warrant a reduced project alternative. The project appears mostly consistent with the City's LCP, specifically with regard to the guidelines in the LCP related to size and scale.</p> <p>The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application.</p>
CCC-22	<p>This comment addresses background information and analysis necessary for the proposed comprehensive update to the public works component of the LCP.</p> <p>Please refer to the Master EIR for the Land Use Element Update. The buildout for the city includes public works demand projections for all uses in the city, including transient, visitor, residential, commercial, agricultural, and industrial development. Based on the Master EIR for the LUE Update and the City's projections for ultimate buildout for the city, including the proposed project, adequate utilities exist to serve the buildout needs, including adequate water, waste water demand, drainage, etc. If there are errors in the arithmetic exercise based on multiplying acreages by maximum allowed development, the error overestimates demand to ensure that there are adequate services available. It is unlikely that every lot will be constructed to utilize the maximum coverage that is used in projecting buildout utility demands. Using a "worst case" buildout in the LUE Update ensures that the City will have adequate utility service and water for Coastal Act priority uses. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application.</p>
CCC-23	<p>The comment provides a recommendation that the City provide information in the LCP amendment application supporting the availability of water supplies and the location, use and capacity of the existing public and private wells. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. Refer also to the response to CCC-22, above.</p>

Comment No.	Response
CCC-24	<p>The comment discusses the potential need for LOS criteria to be used in the LCP amendment to address traffic during peak commuter as well as peak recreational periods. The comment also states that it may be necessary to include policies requiring new projects to mitigate congestion impacts.</p> <p>The City's Circulation Element includes the design capacities for local streets. This information is readily available to the public. The concern is not the design capacities of the roads but whether or not the roads can accommodate increased traffic. LOS is one means to determine if there is a significant impact from the development on local roads. Tables in Section 4.8, Transportation/Traffic, of the EIR indicate that all roads and intersection would operate at a level of service C or better with the proposed project with the exception of <del>the Highway 1/Lo Sage Drive intersection and</del> two intersections in Pismo Beach. These intersections are unavoidably locally impacted—meaning it is difficult to access Highway 1 at peak hours from these <del>two</del> <u>three</u> roads. Neither the City of Pismo Beach nor Caltrans commented on this issue.</p> <p>The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application.</p>
CCC-25	<p>This comment states that LCP policies, particularly within the public works component, should address the sustainability of water, sewer, and road capacity resources. The comment will be brought to the attention of the City so that it can be considered when reviewing the LCP amendment and preparing the LCP amendment application. Refer also to the response to CCC-22, above.</p>
CCC-26	<p>This comment concludes the CCC's letter and does not contain any substantive statements or questions about the EIR. No further response is necessary.</p>

## 9.2 DRAFT EIR PUBLIC COMMENT LETTERS AND RESPONSES

### 9.2.1 Master Responses

Many comments submitted by members of the public related to substantially similar issues. The following 13 responses are master responses intended to address all of the comments submitted in relation to these issue areas. All individual responses set out in Section 9.2.2, Public Comments, below, related to comments regarding one of these issue areas are referred back to the appropriate master response to avoid unnecessary length and duplication in this document.

Response No.	Master Response
<b><i>Equestrian Issues</i></b>	
EQ-1	Potential Loss of Equestrian Parking Spaces
EQ-2	Adequacy of the Equestrian Parking Survey
EQ-3	Design/Safety of the Equestrian Parking Area
EQ-4	Equestrian Beach Access Issues
EQ-5	Finding and Sufficiency of Five Equestrian Parking Spaces
EQ-6	Leasing of State Park Lands to a Commercial Developer
EQ-7	Consideration of Dune Area for Equestrian Parking
EQ-8	Grand Avenue Re-Alignment Alternative
EQ-9	Equestrians' First Choice for Alternative Parking Area
EQ-10	Parking for Large Non-Equestrian Vehicles
EQ-11	Economic Benefits of Equestrian Uses
EQ-12	Understanding that Twenty-Five Equestrian Spaces Would Be Provided
EQ-13	Agreement for Equestrian Parking at Close of Oso Flaco Lake Access

## **Master Response EQ-1. Potential Loss of Equestrian Parking Spaces**

Although phrased in several different ways, the most frequently expressed comment from members of the public regarding the proposed Grover Beach Lodge was that more parking was needed for equestrian uses than are included in the proposed project. Commenters state that they need as many as 50 spaces to fulfill the growing needs of equestrian riders in this area, and feel the project minimizes the importance of this recreational use. Commenters claim that there are not enough places left to ride horses in the state, and that the closure of Oso Flaco Lake in 1982 limited the available spaces even further. They also have concerns about the lodge being an inappropriate commercial development in this beach town, and a step towards “Los Angelesation” of the Central Coast – uses which should not take priority over their established equestrian uses.

CEQA requires an EIR to analyze a project to determine if it would result in significant environmental impacts to resources, such as recreation, and if so to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment (CEQA Guidelines §15041). Equestrian rides are a protected recreational activity under CEQA. Appendix G of CEQA states that a significant impact would potentially occur if the project:

- a) increases the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- b) includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian (CEQA Guidelines §15021(d)). Nevertheless, potential impacts on a particular recreational use at a particular location as a result of a proposed project do not fall within the Appendix G framework listed above. This impact is not necessarily one that impacts the physical environment, which is what CEQA is intended to protect. The issue of the amount of equestrian parking is a policy issue, which the City should consider, in consultation with State Parks, as part of balancing this interest with all other interests for the proposed project. This frames the question at issue: Is it appropriate for the City to approve the proposed project under CEQA if the project would result in the loss in equestrian parking spaces?

Utilizing the thresholds of significance set forth in Appendix G of the CEQA Guidelines (see above), it is not anticipated that the project would result in a significant impact on recreational resources, including equestrian uses. The project is not expected to result in an increase in the use of existing neighborhood parks and recreational facilities such that the facilities would deteriorate more quickly. Use of existing onsite recreational facilities, including the existing boardwalk, beach access routes, adjacent golf course, and Monarch butterfly grove, are expected to experience additional activity as a result of the lodge and conference center guests. However, these facilities have sufficient capacity to accommodate the additional use and no deterioration of those facilities is expected to occur. The Lodge is not expected to bring additional equestrian riders into the area. It is unlikely that an increase in horse riders will result

from the lodge facilities being built, as the lodge and conference center do not provide amenities needed by equestrians or that would encourage that use. (See (a), above).

The project does include recreational facilities and requires the relocation of existing recreational facilities, but these have been designed to avoid adverse physical effects on the environment. The EIR recommends the environmentally superior alternative where equestrian parking would be designed within the proposed parking areas to serve the lodge guests and public (the project proposes 132,464 square feet of parking and hardscape coverage). This alternative would avoid impacts to ESHA and dune habitat located south of Grand Avenue. Therefore, the EIR also found that the proposed project did not meet the significance thresholds under subsection (b), above. The potential loss of equestrian parking is not a significant environmental impact as defined by CEQA Guidelines Appendix G.

Interestingly, the CEQA Guidelines have recently been changed to delete a reference to adequate parking capacity. Appendix G of the 2009 CEQA Guidelines, under Transportation/Traffic, states that impacts may be significant if the project “would result in inadequate parking capacity” (Appendix G (2009) XV(f)). However, this item was deleted from the 2010 CEQA Guidelines’ thresholds of significance. This indicates an intent by the legislature to minimize the importance of parking in a CEQA analysis. This could be because parking spaces are generally governed by local zoning ordinances and municipal codes. The change in policy could also reflect an effort to encourage non-motorized travel.

The EIR found that the proposed project would provide additional recreational facilities to the city by providing, in addition to the needed lodge and conference facilities, added boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property. The proposed use is consistent with the State Parks Development Plan and the City’s General Plan and LCP. Revenue increase is expected to occur through concession contracts and through increased user fees as a result of the attractiveness of the proposed project and potential assistance in providing funds for added maintenance of nearby recreational uses, thereby resulting in a net benefit to recreational resources for all Californians. Nevertheless, the project would result in a decrease in equestrian parking, which could potentially reduce equestrian uses at peak times. As stated above, this potential loss does not constitute a significant impact under CEQA thresholds, and the impacts are further minimized by the applicant’s and City’s effort to preserve equestrian parking as part of the project design.

Currently, this property is being underutilized, with a large vacant dirt lot located in an area with great potential to serve as a public access point and visitor-serving location for beach users. The proposed project would increase recreational activities and interest at this beach access point, as well as create a better use of the property through design techniques and planning. The project is designed to preserve equestrian uses onsite, while also permitting additional uses and growth in this visitor-serving area. This would result in a net benefit to recreational users of this location.

Equestrians have questioned whether or not there may be prescriptive easements at issue, based on their historical use of this site for parking. While State Parks has been allowing equestrian parking on this site for many years, such use has always been informal and is not an explicit provision of any LUE, LCP, Coastal Act, or other policy permitting its use. Permissive uses cannot create prescriptive rights. In addition, government property is not susceptible to

prescriptive easements by public use. Therefore, no legally enforceable right to park in this location has been created.

Certainly, the numerous equestrian comments and concerns brought forward in the public review period are appropriate concerns from community members and tax payers in and outside of this area. Their concerns need to be taken into account by the City in approving and/or making physical changes to the project. However, the potential loss of equestrian parking spaces through development of the proposed project is not an environmental issue that can rely on CEQA guidance for prevention. This policy decision on the size of the equestrian parking area must be made by the City Council, in consultation with State Parks.

### **Master Response EQ-2. Adequacy of the Equestrian Parking Survey**

Numerous equestrian commenters challenged the adequacy of the equestrian parking survey taken by State Parks and included in Appendix F of the EIR. Commenters claim that the survey, taken over the course of more than a month, was insufficient to accurately gauge existing equestrian use at the project location for the following reasons, among others:

- a) There are substantial inconsistencies between morning and afternoon usage of the parking area;
- b) There are substantial inconsistencies between summer and winter usage of the parking area;
- c) The survey included counts over the Labor Day holiday weekend, when most equestrians stay away from the beach;
- d) The survey excludes times when families with children at home can ride;
- e) The survey underestimates usage because it was taken after the beginning of the school year, when usage is reduced;
- f) The survey needs to be done in the mornings and weekends for a minimum of two weeks in good weather;
- g) Equestrians generally ride early in the morning;
- h) The study did not include a “studies outline defining the criteria needed to provide a comprehensive evaluation of the communities equestrian needs for the dunes area”;
- i) The survey only includes summer months when equestrian usage is potentially lower due to the presence of heavy non-equestrian crowds at the beach;
- j) The survey counts occurred entirely in afternoon hours, at times when equestrians are less likely to ride the beach because of strong winds and heavier crowds and beach traffic;
- k) The study is being used to minimize equestrian usage, potentially due to the cost of developing a comprehensive staging area of size to accommodate true usage;
- l) The survey didn’t include Tuesday or Wednesday counts;
- m) The survey didn’t take into account group rides that occur on a weekly basis; and
- n) Often, equestrians choose not to ride on days that are best for them because it is crowded with holiday and/or out-of-town crowds.

There has been significant confusion regarding the purpose and results of the survey, including the determination that an average of five horse trailers were parked onsite, and that the project applicant is therefore proposing five parking spots for equestrians. Both of these assumptions are incorrect. First, the survey includes counts of (1) equestrian trailers parked in the dirt lot, (2) the capacity for horses of those trailers parked in the dirt lot, and (3) other non-equestrian vehicles parked in the dirt lot. Results of the survey show that no more than six trailers were

present at any one time and that there was only an average of 1.5 equestrian trailers parked at the project site at any given time during the month-long survey period. These trailers had an average combined capacity to hold five horses (third column, "Trailer Capacity"). There was also an average of three non-equestrian vehicles parked in the dirt lot over the course of the survey, though these numbers varied greatly (ranging from zero to 23) depending on the day of the week and holiday weekend usage. Therefore, the survey did not conclude that five horse trailers were parked at the site on average, but rather, that only 1.5 trailers were utilizing parking spaces on average, which had the average capacity to house 5 horses. The maximum number of horse trailers present at any survey count was six.

However, the results of the survey did not dictate the size of the proposed equestrian parking area. State Parks has been monitoring and managing the area for many years. Based on observations from State Parks' personnel, the typical peak usage rarely exceeds approximately 12 trailers, except for special events. Therefore, space for 10 to 15 horse trailer spots would likely be sufficient to accommodate the typical equestrian use on most occasions.

While the area may not be sufficient to accommodate 100% of equestrians on the busiest days or special events, the City and State Parks believe there are other alternatives to address peak usage. In the event of large organized events, with advanced notice and application for a Special Events permit from State Parks, Parks' personnel could reserve public parking on the north side of Grand Avenue for equestrian trailers. In addition, State Parks could also work with the Lodge operators to make additional private parking available. In this scenario, horses could be unloaded at the equestrian area and trailers parked across the street. Since large equestrian events are not likely to occur in the peak summer season, it is anticipated that public and private parking would be available.

For non-special events when the equestrian parking area is full, a similar approach could be used. The public parking areas has been designed to have diagonal parking spaces with the intent of allowing over-sized vehicles to use them as a pull through parking space. State Parks could work with equestrians to post temporary signage to reserve this parking for equestrians.

The EIR conservatively estimated five horse trailers parked at the lot at any given time, and therefore found that the proposal to provide between 10 and 15 spaces was reasonable. These numbers are not intended to minimize the claim that at times there are many more trailers in the parking area. Many accounts of heavy equestrian usage of the parking lot have been brought forward for consideration by the City through the comment period and public review process. A few commenters stated that as many as 50 spaces are needed to accommodate the growing need for parking. Others pointed out that there are frequently as many as 25 trailers in the parking area. These anecdotal accounts of current usage are valuable in evaluating the parking needs of equestrians, and provide insight into what should be considered to accommodate fluctuations in equestrian use and large group rides.

The proposed project includes plans for an equestrian parking and staging area that will accommodate between 10 and 15 horse trailers depending on the size of the trailers and configuration of the area (Refer to Sections 2.5.3, Equestrian Parking (Area C), and 2.5.3.1, Equestrian Staging Area, of Chapter 2, Project Description). The highest number of horse trailers counted in the parking lot over the course of the five-week survey was six, on Saturday August 14, 2010 at 3:00 p.m. The proposed plans for equestrian parking and staging would be able to accommodate approximately double this number of trailers.

Usage was also generally consistent throughout the week, as show in the table below. Results tend to show that equestrian usage was similar on week days and weekends (when non-equestrian traffic and crowds are generally heavier), despite reports that equestrians typically avoid the beach on weekends. However, it is not unreasonable that equestrian uses are scheduled to avoid the busiest beach crowds and it is presumed that this does occur to some degree. Similarly, the survey may have overestimated non-equestrian parking in the dirt lot, as other beachgoers predominantly visit the beach in the afternoons and on weekends (times when survey counts were made).

Day	Sundays	Mondays	Thursdays	Fridays	Saturdays
Average Horse Trailers Present Over the Entire Day	4.2	4.2	3.2	4.8	4.0

*Note: These numbers include two to four counts in a single day, and are therefore higher than the 1.5 average horse trailers counted onsite at any specific time.*

It is important to note that CEQA requires an analysis and mitigation of *significant* impacts. Complete removal of equestrian access from this location would potentially be a significant impact on that recreational use. However, failure of the proposed parking to completely accommodate 100% of equestrian users at any given time will not necessarily result in a significant impact. If proposed parking is sufficient to accommodate typical equestrian uses on most days, then it is considered to be in compliance with CEQA. The lack of parking spaces on the busiest of days would not be considered significant unless it was shown that typical usage exceeded available parking on a significantly frequent basis.

Several commenters have expressed concern for equestrians that travel from outside of Grover Beach and/or San Luis Obispo County to ride at Pismo State Beach. It would be a significant burden on equestrians who have traveled a substantial distance to Grover Beach to arrive and be unable to find parking. However, as discussed herein, the amount of parking proposed appears to be sufficient to meet the average equestrian parking need and other alternatives are available to address peak usage and special events. Therefore, out-of-area travelers would have sufficient parking on most days.

One equestrian user provided a similar survey of horse trailer use of the project site in a comment letter (Refer to Comment Letter from Deah Rudd (DRu), below). This survey included morning and/or afternoon counts taken every day for over a week. Results were as follows:

Number of Horse Trailers Present	Sunday	Monday	Tuesday	Wednesday	Thursdays (Average)	Friday	Saturday	Weekly Average
Mornings	2	4	2	5	6	8	5.5	4.6
Afternoons	6	NA	NA	NA	2	NA	NA	4

Although the survey is limited in its applicability because it only covers a period of one week, the survey did not show significantly greater use in the morning times or on weekdays, when crowding may generally be lower at the beach. More importantly, the survey did not show any greater use than was analyzed in the EIR. The EIR assumed an average of five horse trailers onsite, while this survey found slightly lower average uses. The maximum number of trailers at the site at any given time was eight, on Friday morning. The proposed parking area of 10 to 15 spaces would also be sufficient to accommodate this number of users. Under either set of circumstances, the proposal for 10 to 15 spaces would appear to meet existing needs on most occasions.

These comments will be forwarded to the City for their consideration. Ultimately the City, in consultation with State Parks, will have to determine whether or not the survey and other information available to them is sufficient to accurately estimate equestrian usage and parking needs at the project location. However, it is the professional opinion of the EIR preparer that based on survey results, site visits, and concern for other uses at the site, the proposal for providing 10 to 15 spaces is adequate to protect existing equestrian access at this site per CEQA requirements.

### **Master Response EQ-3. Design/Safety of the Equestrian Parking Area**

Many commenters expressed concerns related to accidents and safety conditions that can be caused by the presence of large trailers with limited space and maneuverability. The EIR evaluated the safety impacts associated with the project and determined that safety of equestrian users would be increased by the proposed location south of Grand Avenue, which creates a lot separate from other users and prevents the need for equestrians to cross Grand Avenue to reach the main trail head. Entrance and internal circulation would be improved with development of a left-turn pocket on West Grand Avenue and one-way travel within the parking area, with trailers leaving at the western driveway and turning right on Grand Avenue. The environmentally superior alternative proposes relocation of the equestrian parking and staging area to the southeast corner of the project site. This alternative location would result in the need for horses to travel a greater distance along and across Grand Avenue to reach the trail head, creating a greater potential for conflicts between horses and automobiles. However, this parking area would also be designated specifically for equestrian uses and striping and signage would be utilized to reduce this safety risk.

Limited space and maneuverability at either location could create additional dangers associated with blind views, insufficient space to enter, park and/or exit the area, and unsafe spacing between and around vehicles to allow horses and riders to move in and out. If the City determines that the alternative location for equestrian parking north of Grand Avenue is preferred, the City could explore other parking designs that could be considered during plan review. The EIR recommends that the City's traffic engineer evaluate the final parking designs and incorporate the design that best meets overall user needs (refer to Chapter 5, Alternatives Analysis).

While the EIR states that the parking lot will be designed for equestrian uses, and will be of sufficient size and configured to allow adequate horse trailer parking, comments point out that the Site Plan (refer to Figure 2-5 of Chapter 2, Project Description) does not appear to provide adequate spacing around vehicles to allow horse movement, staging, saddling, etc. The equestrian parking area is not proposing to delineate parking spaces because there is such a wide variety in the size and type of equestrian trailers. The estimated range of 10 to 15 spaces is based on the current area accommodating 12 parking spaces with an average width of 12 feet and length of 50 feet. However, the maximum utility of the parking area will be based on the size and type of trailers and the ability of equestrians to gauge the needs of their trailer and other trailers.

#### **Master Response EQ-4. Equestrian Beach Access Issues**

Equestrian commenters make several claims that because of the small parking area proposed, the proposed project is improperly limiting their right to access the beach and utilize this spot for horse riding activities. Please also refer to Master Responses EQ-1 related to the potential loss of equestrian parking spaces and EQ-2 regarding the existing usage and need for horse trailer spaces.

The EIR analyzed the project for consistency with the LCP, Coastal Act, Land Use Element, Pismo State Beach-Oceano Dunes State Vehicular Recreation Area General Development Plan, and Amendment to the General Development Plan and found the project to be consistent with public access policies located in all documents. The City of Grover Beach LCP, Policy 5.7.D, requires that adequate parking and other recreational support facilities are available to the public. The EIR found the proposed project to be consistent with this policy, finding that the parking proposed for the public, lodge guests, and equestrian users was adequate to sustain existing levels and/or support existing uses. Each of these documents has envisioned utilization of this property for a major lodge/hotel/convention center since the early 1980s. The project incorporates public parking and preserves 100% of existing public parking at the site, and protects and enhances public access to the beach and dunes through added boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.

While the project would serve to benefit public beach access in general, equestrians believe their access rights are being minimized by the smaller, defined equestrian parking area. As previously discussed, the project proposes an area sufficient to accommodate 10 to 15 horse trailers depending on trailer size and area configuration. According to the equestrian parking survey performed by the State, observations by State Parks' personnel, and observations from commenters, there do not appear to be many occurrences of more than a dozen trailers using the site at any one time. Therefore, space for 10 to 15 horse trailer spots would likely be sufficient to accommodate all equestrian uses on most occasions. While the area may not be sufficient to accommodate 100% of equestrians on the busiest days, this impact does not violate any applicable public access policy or standard and does not rise to a level of significance under CEQA. Refer to Master Response EQ-2, above, regarding challenges to the survey results and a discussion about when a significant impact may result from the lack of parking on peak days.

As the EIR has found that the project, and specifically the proposed parking area, does not conflict with applicable policies regarding the protection and preservation of public access and parking at the beach, no significant impact to beach access would occur.

**Master Response EQ-5. Sufficiency of Five Equestrian Parking Spaces**

Many commenters stated that five equestrian parking spaces were not sufficient to accommodate the equestrian uses at the park. These comments appear to be the result of confusion regarding how many spaces were being provided and the results of the equestrian parking survey included in Appendix F of the EIR. The survey conducted by State Parks over a month-long period found that there was an average of 1.5 trailers parked at the location with an average trailer capacity for five horses on the beach at any given time. No more than six trailers were noted at the beach at any specific time during the survey period.

However, the survey had no bearing on the design of the equestrian area and the project applicant is proposing 10 to 15 equestrian parking spaces, depending on the size of trailers and configuration of the parking area. Please refer to Section 2.5.3.1, Equestrian Staging Area, of Chapter 2, Project Description, and Table 2-1 for a breakdown of equestrian parking spaces. Because the project does not propose five equestrian parking spaces, no further response to these comments is necessary.

Please refer to Master Responses EQ-1, EQ-2, EQ-3, EQ-4, and EQ-12 for additional information regarding the number of equestrian parking spots to be provided.

**Master Response EQ-6. Leasing of State Park Lands to a Commercial Developer**

Many comments challenge the utilization of state park lands for commercial development and claim that such lands are better suited for open space public use. While the basis for these concerns are recognized as important ones, this is not an environmental issue and these comments do not raise substantive questions or issues regarding information contained within the EIR. It should be recognized that in 1994, the state legislature enacted legislation related specifically to the development of extensive new facilities at this site. Public Resources Code §5003.02.1 provides that:

“(a) The Legislature hereby finds and declares that the department and the City of Grover Beach, in a joint project, are in the process of entering into an operating agreement for the purpose of negotiating a concession contract for the development of extensive new facilities at Pismo Beach State Park, and that the standard, 20-year term is insufficient to enable the concessionaire to amortize the type and scale of improvements that the department and the city will require the concessionaire to make.

(b) The Legislature further finds and declares that approval of commercial development at Pismo Beach State Park does not provide precedent for commercial development in other units of the state park system and is a one-time exception to Sections 5019.53 and 5080.03 by reason of the following circumstances:

- 1) The general plan for the state park provides for the area.
- 2) The site is located on the perimeter of the state park and adjacent to State Route 1.
- 3) The development will not impact the resources or the public's use of the state park.
- 4) The land proposed to be developed is suitable for commercial development.

(c) Pursuant to subdivision (a) of §5080.18, the term of the concession contract entered into by the department and the City of Grover Beach with a concessionaire for the development of new facilities at Pismo Beach State Park may be for a period not to exceed 50 years if the contract also provides that the rent be reviewed and adjusted at least every five years to reflect market rates and economic conditions prevailing in the area in which the concession is located.

(d) No contract subject to this section may be advertised for bid, negotiated, renegotiated, or amended in any material respect unless the Legislature reviews and approves the proposed contract in the annual Budget Act.”

Furthermore, State Parks' General Development Plan and the City's General Plan and LCP all identify the site for commercial development. The proposed project would provide additional important visitor-serving overnight accommodations, recreational access improvements, and other resource enhancement at this location.

### **Master Response EQ-7. Consideration of Dune Area for Equestrian Parking**

Many commenters raise the question of why equestrian parking was located and analyzed in the dune area south of West Grand Avenue when it was generally clear that Coastal Commission staff was opposed to any development in this area and would not approve this location. Commenters cite a letter from Coastal Planner Madeline Cavalieri, stating that CCC staff cannot support proposed development in this dune area.

The EIR preparers were aware of the Coastal Commission staff's previous statements that this area could potentially support Environmentally Sensitive Habitat Areas, and that CCC staff was opposed to any development in this dune area. However, this is the location for equestrian parking that was brought forward by the project applicant. The EIR must analyze the project as proposed; therefore, the EIR was predominantly focused on analyzing the environmental impacts associated with locating the equestrian parking area in this location. The EIR also considered several alternatives to this parking area, including the following:

- a) Alternative C1 – relocate equestrian parking to north of Grand Avenue onto the southeast corner of the proposed lodge site and provide suitable base for horses. This alternative was carried forward for consideration because it met project objectives, eliminated impacts to potential ESHAs south of Grand Avenue, and resulted in minimal impacts generally associated with a slight reduction in vehicular parking, maintenance issues, and safety issues related to horses crossing Grand Avenue.
- b) Alternative C2 – relocation of the equestrian parking to the Highway 1 multi-use site (refer to Figure 5-2 of Chapter 5, Alternatives Analysis), a small vacant area immediately adjacent to the Meadow Creek riparian area and the State Parks Ranger Station. This alternative was not brought forward for consideration because the environmental impacts associated with locating equestrian parking in this area would be more environmentally damaging than other alternatives, including impacts to biological resources associated with Meadow Creek and impacts to a known archaeological site in this area based on State Parks information. Therefore, this alternative was not considered to be preferable.
- c) Alternative C3 – relocation of the equestrian parking to the Pier Avenue beach entrance in the vicinity of the Oceano Campground. This alternative was not carried forward for consideration because it was determined that insufficient space existed in disturbed areas to allow for expansion of parking, and significant environmental impacts would result. Therefore, this alternative was considered less preferable than Alternative C1.
- d) Alternative C4 – relocation of the equestrian parking area to the Silver Spur Road area, and utilization of the Arroyo Grande Creek levee as beach access. This alternative was not carried forward for consideration because private property ownership made its suitability for this purpose speculative at best.
- e) No Project Alternative – leave equestrian parking as it currently exists in the site's disturbed dirt lot area.

Refer to Chapter 5 of the EIR for the alternatives analysis.

In analyzing the impacts associated with the proposed location of the equestrian parking area south of Grand Avenue, the City and the applicant have taken into account several benefits that would result from this design. The proposed location would create a separate area for horse

parking, rather than integrating it within other public or lodge parking. It would also eliminate the need for equestrians to cross Grand Avenue, improving safety of riders and other beach users. The proposed location south of Grand Avenue is directly adjacent to the trail head and would provide the best accessibility to the dune trails. Therefore, with appropriate mitigation to minimize impacts to biological resources, the proposed site is an appropriate and beneficial option suitable for analysis.

Because project plans included equestrian parking in the dune area south of Grand Avenue, this is the location used as the basis of the EIR analysis. Other alternatives were identified, as described above, and the EIR recommended an environmentally superior alternative that moves the equestrian parking to the north side of West Grand Avenue in order to avoid potential ESHA.

**Master Response EQ-8. Grand Avenue Re-Alignment Alternative**

Several commenters state that the placement of parking within the Grand Avenue right-of-way through realignment of that street should have been considered as an alternative. CEQA requires that an EIR describe a range of reasonable alternatives to the project, or the location of the project, that would feasibly attain most of the basic objectives of the project but would substantially lessen any of the significant effects of the project. An EIR need not consider every conceivable alternative to the project (CEQA Guidelines §15126.6(a)). Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible or those whose implementation is remote or speculative.

The EIR discussed five alternatives to the proposed equestrian parking area south of Grand Avenue, including reconfiguration of parking on site, a variety of off-site locations, and the no project alternative. The EIR need not consider every alternative to the project, and the placement of equestrian parking in the Grand Avenue right-of-way could create additional impacts in this area. While the EIR did not analyze this alternative, nothing precludes decision-makers from considering it in their analysis of the project. This comment will be forwarded to the City for its review.

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**Master Response EQ-9. Equestrians' First Choice for Alternative Parking Area**

Many equestrian comments expressed a preference for an alternative equestrian parking area located north of the ranger station west of and alongside Highway 1 just north of the State Parks Corporation Yard. While the location may provide all the benefits mentioned by the comments (no dunes, suitable distance from crowded Grand Avenue entrance, separate access to dune trail system, sufficient size, no earth moving required), this location is not property that the project applicant has any authority to utilize for equestrian or other project purposes. As stated by the comments, this property is owned by State Parks, who is under no obligation to offer it up for equestrian uses in order to accommodate this project development. Additionally, moving equestrian parking to this location would likely result in impacts to existing uses at the ranger station/maintenance yard, including impacts to biological resources associated with Meadow Creek and impacts to a known archaeological site in the area according to State Parks information. State Parks currently uses this property as a storage and staging area for equipment, sand and any other necessary materials. Unlike the project site, this area does not serve as a public beach access and creating a public use in this area could expose State Parks to increased liability for uses occurring onsite. Designing the proposed project in a manner that continues to allow existing equestrian uses at the same location is the only way to avoid impacts that would occur if the parking were moved into other areas.

As stated in Master Response EQ-8, above, an EIR is not required to consider alternatives that are infeasible or those whose implementation is remote or speculative. The feasibility of this alternative is speculative at best because the project applicant has no authority to offer or recommend that it be used for equestrian parking.

### **Master Response EQ-10. Parking for Large Non-Equestrian Vehicles**

Many equestrians in the community expressed concern over the fact that no separate parking was allotted for large non-equestrian vehicles, such as RVs, campers, and trucks pulling trailers for off-road vehicles, four-wheelers, etc. This is incorrect. State Parks has required that the area of public parking at the southeast corner of the site include diagonal pull-through parking spaces to accommodate over-sized vehicles. In addition, the applicant has included diagonal pull-through parking spaces within the hotel parking lot to accommodate over-sized vehicles for hotel and restaurant guests.

It should be noted that the issue of which vehicles park in which parking spots is not necessarily an environmental issue appropriate for discussion in the EIR. However, as the issue relates to public access to the beach for all users and project consistency with the City's LCP and the Coastal Act, it is important to address.

It is possible for parking areas consisting only of regular sized spaces to accommodate larger vehicles or vehicles pulling trailers if spaces are striped to allow those vehicles to take up more than one space. For example, RVs, commercial trucks and vehicles pulling trailers often park in large box store parking lots by pulling forward into two spaces and utilizing the length of both spaces to accommodate the vehicle.

The City and State Parks have indicated the desire to retain formal parking for all public uses currently existing at the project location. Thus, the project will retain the 160 public parking spaces presently located at the end of Grand Avenue. The existing dirt lot is currently used by equestrians and large non-equestrian vehicles, as well as for overflow parking during peak times. It should be noted that these large non-equestrian vehicles also have ample parking available on the beach, should they choose to drive onto the sand south of the Grand Avenue entrance.

Transportation/Traffic mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR) (as amended by other comments herein) directs the City as follows:

“Prior to issuance of a grading permit for Area A, the circulation parking patterns shall be reviewed and approved by the City to improve ingress and egress between the individual parking areas in Area A, to allow turn-around space in each parking area to avoid vehicles from having to back up to turn around or exit the lots, and to maximize parking on site.”

**Master Response EQ-11. Economic Benefits of Equestrian Use**

Many comments reference the economic benefit derived from equestrians from both within and outside of San Luis Obispo County. It is agreeable that equestrians bring not only an economic benefit to this area, but also a level of recreational and personal enjoyment to riders and spectators of the horses in this natural setting. While this is a valid point, it is not one directly related to any environmental impacts or effects resulting from the proposed project. Economics is generally not discussed in the environmental review process other than to assess the economic feasibility of various project components or alternatives. CEQA Guidelines §15131 specifically states:

“Economic or social information may be included in an EIR or may be presented in whatever form the agency desires.

- (a) Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis should be on the physical changes.”

If the economic impact of a project was so significant as to impact area resources, then a discussion would appropriately be made in an EIR. However, while the economic impact of equestrians in this area and the state is recognized, these conditions do not rise to the level of significance that would implicate an economics analysis.

**Master Response EQ-12. Understanding that Twenty-Five Equestrian Parking Spaces Would Be Provided**

Several commenters refer to an understanding or agreement that 25 equestrian parking spaces would be provided by the applicant and City to accommodate their use at the project site. There have been many meetings and discussions between the City, State Parks, the applicant, and community members regarding the effect of the project on equestrian parking at the beach and how best to gauge and accommodate their need for parking at this location. However, at no time has the City or State Parks made any promises regarding the number or location of spaces that would be allotted to equestrians.

The State has managed and monitored the existing equestrian area for years and is knowledgeable about the existing usage and need for equestrian parking at the project location. The City has also committed to including separate equestrian parking as a part of this project's design. However, the proposed number of spaces ultimately lies with the City and State Parks as part of the Joint Authority. The City Council has final approval authority on the number of spaces and the discretion to provide less parking.

Refer also to Master Response EQ-1 related to the potential reduction of equestrian parking spaces at the beach.

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**Master Response EQ-13. Agreement for Equestrian Parking at Close of Oso Flaco Lake Access**

Many equestrian comments have referred to an agreement entered into at the close of horse access at Oso Flaco Lake that equestrian parking would be provided and protected at the end of Grand Avenue. State Parks has unofficially allowed use of the project site for equestrian staging since 1982 when the previous facility near Oso Flaco Lake was closed. However, there are no adopted State Park policies designating the site for use by equestrians. While the City and State Parks seek to preserve the ability for equestrians to park and use this area, they are under no legal obligation to provide, protect, or maintain the equestrian parking at its current capacity in this location.

Other comments have requested that the adoption of formal policies defining and protecting the equestrian use be made mandatory conditions of approval of the proposed project. The City has the discretion to adopt and implement policies such as this one, but none currently exist in the City's General Plan that would be inconsistent with the proposed project.

The City recognizes that there are limited opportunities to ride horses in public places in California, and recognizes the benefits derived from protecting this activity. Thus, the City has taken special steps to assure that equestrian parking will not be terminated by the proposed project. That being said, it is within the discretion of the City to balance the need for equestrian parking with all other uses appropriate for the location, including the development of a lodge and conference center facility such as the proposed project. This particular use has been identified as appropriate for this location in the City's General Plan, LCP, Land Use Element Update, and the Pismo State Beach/Pismo Dunes Vehicular Recreation Area Amendment to the General Development Plan (among others) and must be balanced with the existing equestrian use.

Please refer also to Master Responses EQ-1, EQ-2, and EQ-4, above.

## 9.2.2 Public Comments

The following members of the public have prepared comments on the Draft EIR:

<b>Respondent</b>	<b>Code</b>	<b>Contact</b>	<b>Page</b>
<b>Sigrid Bylsma</b> Email dated: January 14, 2011	SB	805.896.6706 sig424@gmail.com	9-58
<b>Carole Gallegos</b> Email dated: January 14, 2011	CG	cowgirlcarole@gmail.com	9-60
<b>Sheila Harmer</b> Email dated: January 14, 2011	SHa	jbsaharmer@prodigy.net	9-62
<b>Dorothy Hull</b> Email dated: January 14, 2011	DH	djhull@att.net	9-64
<b>Jeannie Keeffe</b> Email dated: January 14, 2011	JK	jeanniekeffe@mac.com	9-66
<b>Sandra Kramp</b> Email dated: January 14, 2011	SK	1417 23 <sup>rd</sup> Street Oceano, CA 93445 (805) 305-9778 sekramp@yahoo.com	9-68
<b>Bill Naylor</b> Email dated: January 14, 2011	BN	bnaylor4@sbcglobal.net	9-70
<b>Patty Rogers</b> Email dated: January 14, 2011	PR	peppermint35@gmail.com	9-72
<b>Janet Sally-Lee</b> Email dated: January 14, 2011	JSL	janetsally@gmail.com	9-74
<b>Lenore Spelbring</b> Email dated: January 14, 2011	LS	nogrownups2@gmail.com	9-76
<b>Susan Spicer</b> Email dated: January 14, 2011	SSp	susanspicer47@aol.com	9-78
<b>Susan Swagerty</b> Email dated: January 14, 2011	SSw	scswag@verizon.net	9-80

<b>Respondent</b>	<b>Code</b>	<b>Contact</b>	<b>Page</b>
<b>Janis Tremper</b> Email dated: January 14, 2011	JT	U.S. Forest Service Santa Lucia Ranger District 1616 North Carlotti Drive Santa Maria, CA 93454-1504  (805) 925-9538 jtremper@fs.fed.us	9-82
<b>Linda Walden</b> Email dated: January 14, 2011	LW(a)	jetspirit@gmail.com	9-84
<b>Jerry Williams</b> Letter dated: January 14, 2011	JW	1270 Humboldt Drive Nipomo, CA 93444  (805) 929-3212 jerry@williams.ms	9-86
<b>Jean L Boyd</b> Email dated: January 15, 2011	JLB	windyjesse@aol.com	9-88
<b>Carla Byrd</b> Email dated: January 15, 2011	CB	cmbyrd12@yahoo.com	9-90
<b>EI-Jay Hansson</b> Email dated: January 15, 2011	EJH(a)	2315 Idyllwild Place Arroyo Grande, CA 93420  (805) 343-1949 hansson@verizon.net	9-92
<b>Mary Wunder</b> Email dated: January 15, 2011	MW	wundermary@yahoo.com	9-94
<b>Marcia Baskin</b> Email dated: January 16, 2011	MB	mkloebel@yahoo.com	9-96
<b>Laurie Gage</b> Email dated: January 16, 2011	LG	fullsail@onemain.com	9-98
<b>Susan Holt</b> Email dated: January 16, 2011	SHo	twobayhorses@msn.com	9-100
<b>Christina and Gerald Sugarman</b> Email dated: January 16, 2011	CGS	CBA01@aol.com	9-102
<b>CJ Foglietta</b> Email dated: January 17, 2011	CJF(a)	jcfolietta@yahoo.com	9-104

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<b>John Keyes</b> <b>California Equestrian Trails and Lands Coalition</b> Email dated: January 17, 2011	CETLC	keymac@ocsnet.net	9-106
<b>Kelly Krambs</b> Email dated: January 17, 2011	KK	doolittledoc@att.net	9-108
<b>Claudia Salot-Engel</b> Email dated: January 17, 2011	CSE	claudia@thunderheadranch.com	9-110
<b>Cherie Dodds</b> Email dated: January 19, 2011	CD	rcdodds@sbcglobal.net	9-112
<b>John Laferriere</b> Letter dated: January 19, 2011	JL	1123 Loreto Court Grover Beach, CA 93433 (805) 473-0545 jl-slo@sbcglobal.net	9-114
<b>P.D. Smith</b> Email dated: January 20, 2011	PDS	PDSCOCO@aol.com	9-123
<b>Lee Ashworth</b> Email dated: January 21, 2011	LA	1485 Camino Mariposa Nipomo, CA 93444 LeKlein@aol.com	9-125
<b>Nora Hernandez</b> Email dated: January 21, 2011	NH	(805) 801-4557 nora@bonnetslace.com	9-127
<b>Dianna and Ed Muraski, Ph.D.</b> Email dated: January 21, 2011	DEM	(805) 474-9217 demuraski@charter.net	9-129
<b>Linda Clarke</b> Letter dated: January 22, 2011	LC	ljclarke@thegrid.net	9-134
<b>Pamela Krahl</b> Email dated: January 24, 2011	PK(a)	pkrahl@wildblue.net	9-136
<b>Patricia L Mensing</b> Letter dated: January 24, 2011	PLM	plmensing@yahoo.com	9-139
<b>Mark and Ellen Morris</b> Email dated: January 24, 2011	MEM	emorris2572@yahoo.com	9-141

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<b>Jackie Pamplona</b> Email dated: January 24, 2011	JP	jpamplona@earthlink.net	9-143
<b>Steve Sassoon</b> Email dated: January 24, 2011	SSa	P.O. Box 221505 Newhall, CA 91322  (661) 733-6534  ssassoon@abf.com	9-145
<b>Superior Guest Care Inc. dba Fin's Seafood Restaurant, Pismo Beach Golf Course</b> Letter dated: January 24, 2011	SGC	25 West Grand Avenue Grover Beach, CA 93433  <i>Contact: Bruce Van Nort and Lucille T Osborn</i>	9-147
<b>Ann Crain</b> Email dated: January 25, 2011	AC	wcrain@att.net	9-150
<b>Gail Kemble</b> Letter dated: January 25, 2011	GK	825 Bear Canyon Lane Arroyo Grande, CA 93420  (805) 440-9708  gaikemble@aol.com	9-152
<b>Doug Le Sage</b> Phone call: January 25, 2011	DLS	(no contact information)	9-156
<b>Bill Chaides Backcountry Horsemen of California</b> Letter dated: January 26, 2011	BHC	Los Padres Unit P.O. Box 6773 Santa Maria, CA 93456	9-158
<b>Kathleen Deragon</b> Email dated: January 26, 2011	KD	kathleen.deragon@sbcglobal.net	9-161
<b>Carol Kennedy</b> Email dated: January 26, 2011	CK	kittykeno@att.net	9-163
<b>Mary Jane Alumbaugh</b> Letter dated: January 27, 2011	MJA	1216 Huasna Road Arroyo Grande, CA 93420  (805) 441-4124	9-165
<b>Leann Bettencourt</b> Email dated: January 27, 2011	LB	leannbettencourt@yahoo.com	9-167
<b>Marney Montgomery Briggs</b> Letter dated: January 27, 2011	MMB	(no contact information)	9-169

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<b>Patti Chambers</b> Email dated: January 27, 2011	PC	patti0555@sbcglobal.net	9-171
<b>Anne R Dunbar</b> Letter dated: January 27, 2011	ARD	898 South Halcyon Road Arroyo Grande, CA 93420 (805) 441-7391	9-173
<b>CJ Foglietta</b> Email dated: January 27, 2011	CJF(b)	jcfoglietta@yahoo.com	9-175
<b>Friends of the Oceano Dunes</b> Letter dated: January 27, 2011	FOD	15131 Garcal Drive San Jose, CA 95127 (408) 242-4445 jim@oceanodunes.org <i>Contact: Jim Suty, President</i>	9-177
<b>Stephanie Greene</b> Letter dated: January 27, 2011	SG	1075 Cheyenne Court Nipomo, CA 93444 realvoiceoftwh@aol.com	9-181
<b>Marcia Guthrie</b> Letter dated: January 27, 2011	MG	112 Frances Way Pismo Beach, CA 93449 (805) 709-0500	9-183
<b>El-Jay Hansson</b> Email dated: January 27, 2011	EJH(b)	2315 Idyllwild Place Arroyo Grande, CA 93420 (805) 343-1949 hansson@verizon.net	9-185
<b>Diane Kastama</b> Email dated: January 27, 2011	DK	(805) 343-6026 dkastama@verizon.net	9-187
<b>Pamela Krahl</b> Additional information received: January 27, 2011	PK(b)	pkrahl@wildblue.net	9-189
<b>Le Sage Enterprises, Inc.</b> Letter dated: January 27, 2011	LSE	Andre, Morris & Buttery 1102 Laurel Lane San Luis Obispo, CA 93406 (805) 543-4171 <i>Contact: Karen Gjerdrum Fothergill</i>	9-198
<b>Karen Luce</b> Letter dated: January 27, 2011	KL	1525 Scenic View Way Nipomo, CA 93444	9-206

<b>Respondent</b>	<b>Code</b>	<b>Contact</b>	<b>Page</b>
<b>Dawn McVey</b> Letter dated: January 27, 2011	DMV	(no contact information)	9-208
<b>Vicki Moore</b> Letter dated: January 27, 2011	VM	(no contact information)	9-210
<b>Gloria Northcote</b> Letter dated: January 27, 2011	GN	1500 Big Baldy Way Arroyo Grande, CA 93420	9-212
<b>Shannon Orr</b> Letter dated: January 27, 2011	SO	(208) 720-3923 roanyrider2@gmail.com	9-214
<b>Beverly L Poorman</b> Letter dated: January 27, 2011	BLP	1196 Carpenter Canyon Road Arroyo Grande, CA 93420	9-216
<b>Ride Nipomo Equestrian Trails Alliance, Inc.</b> Email dated: January 27, 2011	RNETA	P.O. Box 1738 Nipomo, CA 93444 <i>Contact: Hans Hansson, President</i>	9-218
<b>David Rosenthal</b> Letter dated: January 27, 2011	DRo	(no contact information)	9-220
<b>Deah Rudd</b> Letter dated: January 27, 2011	DRu	(no contact information)	9-222
<b>David and Anne Sommerville</b> Letter dated: January 27, 2011	DAS	6010 Las Pilitas Road Santa Margarita, CA 93453	9-234
<b>Jiordana Stark</b> Letter dated: January 27, 2011	JS	1505 Tiffany Ranch Road Arroyo Grande, CA 93420	9-236
<b>Dr. &amp; Mrs. Richard D Tarver</b> Letter dated: January 27, 2011	RDT	(no contact information)	9-238
<b>Stephanie Tippitt</b> Letter dated: January 27, 2011	STi	(no contact information)	9-240
<b>Susan Tuttle</b> Letter dated: January 27, 2011	STu	(805) 720-2418	9-242
<b>Janette and Larry Wesch</b> Email dated: January 27, 2011	JLW(a)	863 Eastview Avenue Arroyo Grande, CA 93420 jwesch71@gmail.com	9-244

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<b>Janette and Larry Wesch</b> Email dated: January 27, 2011	JLW(b)	863 Eastview Avenue Arroyo Grande, CA 93420 jwesch71@gmail.com	9-246
<b>Rob Dodds</b> Letter dated: January 28, 2011	RD	(no contact information)	9-248
<b>Lisa Fiske</b> Email dated: January 28, 2011	LF	928 Anna Circle Nipomo, CA 93444 (805) 343-6020 fiskelisa@msn.com	9-250
<b>Brenda Gilardone</b> Email dated: January 28, 2011	BG	gilardoneb@yahoo.com	9-252
<b>Nora and Kitt Jenaе</b> Letter dated: January 28, 2011	NKJ	(no contact information)	9-254
<b>Hillary Klein</b> Email dated: January 28, 2011	HK	hillary@hillaryklein.com	9-256
<b>Pamela Krahl</b> Email dated: January 28, 2011	PK(c)	pkrahl@wildblue.net	9-258
<b>Lisa Margulies-Chadwick</b> Letter dated: January 28, 2011	LMC	2610 Chamisal Lane Arroyo Grande, CA 93420	9-260
<b>Maureen Martin</b> Email dated: January 28, 2011	MM	maureendmartin@aol.com	9-262
<b>Pamela Michaelis</b> Email dated: January 28, 2011	PM	494 Vista Del Robles Arroyo Grande, CA 93420 horses@surfari.net	9-264
<b>Kathy Schwartz</b> Letter dated: January 28, 2011	KS	(no contact information)	9-266
<b>Denise Seidman</b> Email dated: January 28, 2011	DS	380 Butterfly Lane Nipomo, CA 93444 (805) 267-7228 deniseseidman@yahoo.com	9-268

<b>Respondent</b>	<b>Code</b>	<b>Contact</b>	<b>Page</b>
<b>Saragail Standish</b> Letter dated: January 28, 2011	SSt	1578 Illinois Way Nipomo, CA 93444	9-270
<b>Laura Linda Strickland</b> Letter dated: January 28, 2011	LLS	2139 Equestrian Road Paso Robles, CA 93446 (805) 550-2711	9-272
<b>Linda Walden</b> Email dated: January 28, 2011	LW(b)	jetspirit@gmail.com	9-274
<b>Else Wolff</b> Email dated: January 28, 2011	EW	1152 Easy Lane Nipomo, CA 93444 (805) 929-6815 Else_Wolff@URSCorp.com	9-276
<b>Donna Joyce</b> Letter dated: January 29, 2011	DJ	(no contact information)	9-278
<b>Darcy Murphy</b> Email dated: January 29, 2011	DM	DMurphy81@aol.com	9-280

The comment letters are provided in this section in the above chronological order with the responses following the individual letters. Comment letters are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section. All comments related to issues discussed in the master responses, above, are referred to the appropriate response in the previous section.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:51 PM  
**To:** Emily Creel  
**Subject:** FW: proposed equestrian parking lot

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**From:** sig [mailto:sig424@gmail.com]  
**Sent:** Fri 1/14/2011 1:34 PM  
**To:** Mary Reents  
**Subject:** proposed equestrian parking lot

Ladies and Gentlemen,

I would like to offer the details of my experiences at this parking lot. I ride in the mornings between 9am and noon, during the week and on weekends. Your usage survey did not consider mornings but this is a time when a mother, such as myself, can get away for a few hours while the kids are in school. By surveying only the afternoon hours, you are excluding an entire population of families with children still at home. At this time of day, there are usually 5-8 trailers in the parking lot. The other item that I would like to point out is that most locals do not ride during the summer months as this is a very busy time for the beach and not suitable for most horses. The survey is not sufficient and the results should not be considered until a new and improved survey can be done.

Besides the fact that more than 5 trailer spaces are needed for a new parking lot, having only 5 spaces would be a major safety issue as trucks and trailers must maneuver easily with plenty of room to spare between riders and horses going in and out. The last thing anybody wants to worry about is an accident that occurs because of poor planning.

thank you for your time,  
Sigrid Bylsma  
805 896-6706

**SB-1**

**SB-2**

**SB-3**

**Response to Email from Sigrid Bylsma, dated January 14, 2011**

<b>Comment No.</b>	<b>Response</b>
SB-1	The comment questions the adequacy of the equestrian usage survey. Please refer to Master Response EQ-2.
SB-2	The comment states that more than 5 horse trailer spaces are needed. Please refer to Master Response EQ-5.
SB-3	The comment concerns safety issues related to parking lot design and maneuverability of trailers. Please refer to Master Response EQ-3.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:27 AM  
**To:** Emily Creel  
**Subject:** FW: Parking

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**From:** Carole Gallegos [mailto:cowgirlcarole@gmail.com]  
**Sent:** Fri 1/14/2011 5:01 PM  
**To:** Mary Reents  
**Subject:** Parking

It seems that more and more horse privialges are being taken away. The western states of the USA would not be what they are today without the horse. Please help preserve peoples right to own and ride horses by not taking any parking places away at the beach.  
Thank you  
Carole Gallegos

CG-1

**Response to Email from Carole Gallegos, dated January 14, 2011**

Comment No.	Response
CG-1	The comment concerns the potential taking of equestrian parking places at the beach. Please refer to Master Response EQ-1.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:26 AM  
**To:** Emily Creel  
**Subject:** FW: Grover beach lodge & Conference Center Draft EIR

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**From:** jbsaharmer@prodigy.net [mailto:jbsaharmer@prodigy.net]  
**Sent:** Fri 1/14/2011 10:33 PM  
**To:** Mary Reents  
**Subject:** Grover beach lodge & Conference Center Draft EIR

I request you reconsider eliminating 20 equestrian parking spaces. You were to provide 25 so plan for it correctly. Your survey results are questionable and were not conducted during peak times of equestrian use such as Weekend mornings & weekday use in months prior to August when many schools periods begin in Southern California. This makes your survey somewhat biased and inaccurate. The plan was for 25 equestrian spaces. Each space must be able to accommodate a truck & trailer + have room for horses to stand outside of the trailer. Many folks today have motor homes or larger trailers with living arrangements. I hope you have planned to accommodate them.

SHa-1  
SHa-2  
SHa-3  
SHa-4

As a possible compromise you could always request reservations for the equestrian spaces and utilize the unused spaces for whatever appropriate needs you may have but who will be the management for that task? Beach space is very precious to all and the opportunity for beach equestrians is so very limited in a state with 100% shoreline. Don't go back on the plan for 25 adequate spaces. Sheila Harmer, Burbank CA

SHa-5  
SHa-6

**Response to Email from Sheila Harmer, dated January 14, 2011**

Comment No.	Response
SHa-1	This comment claims that 20 equestrian parking spaces are being eliminated. Please refer to Master Response EQ-1.
SHa-2	This comment states that the City was to provide 25 equestrian parking spaces. Please refer to Master Response EQ-12.
SHa-3	This comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2.
SHa-4	This comment concerns the design and spacing needed to accommodate large horse trailers and motor homes. Please refer to Master Response EQ-3.
SHa-5	The comment recommends a requirement for reservations of the equestrian parking spots and questions the feasibility of managing that task. Reservations are not considered necessary for parking at this location. Usage estimates show that sufficient parking would exist onsite to accommodate average and above-average equestrian activity. The requirement may also serve to discourage equestrians from using the site if they are required to plan ahead with a reservation.
SHa-6	Please refer to Master Responses EQ-4 related to beach access and EQ-12 regarding the comment's reference to a "plan for 25 adequate spaces."

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:52 PM  
**To:** Emily Creel  
**Subject:** FW: horse trailer parking

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**From:** DOROTHY HULL [mailto:djhull@att.net]  
**Sent:** Fri 1/14/2011 1:32 PM  
**To:** Mary Reents  
**Subject:** horse trailer parking

Please, don't restrict us to only a few spaces. There are only a few places on the whole of California's beaches where we can ride. California has over 1000 miles of coast.. Let us have our little bit. Please. Dorothy Hull, Nipomo.

DH-1

**Response to Email from Dorothy Hull, dated January 14, 2011**

<b>Comment No.</b>	<b>Response</b>
DH-1	The comment states that California has over 1,000 miles of coast but there are only a few places on California beaches where equestrians can ride, and requests that the City allow equestrians to have their little bit of coast. Please refer to Master Responses EQ-1 regarding the potential loss of equestrian parking spaces and EQ-4 related to beach access.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:51 PM  
**To:** Emily Creel  
**Subject:** FW: URGENT - Equestrians we NEED your support - you must respond by 5:00 p.m. on Friday 1/28/11  
**Attachments:** grover doc 001.jpg; ATT1288004.htm; Grover.doc 2.001.jpg; ATT1288005.htm; Equestrian Staging Area.doc; ATT1288006.htm; Figure F - Equestrian Numbers.doc; ATT1288007.htm

**From:** jeannie keeffe [mailto:jeanniekeeffe@mac.com]  
**Sent:** Fri 1/14/2011 1:09 PM  
**To:** Mary Reents  
**Subject:** URGENT - Equestrians we NEED your support - you must respond by 5:00 p.m. on Friday 1/28/11

I can't believe this.! Only 5 horse trailer parking spaces is not going to work.! When groups go to the beach to ride their horses they usually go as Groups of anything from 4 to 10 rigs.! Many groups drive up from the Santa Ynez and Santa Barbara area to ride the Pismo State Beach. Many groups drive down from 'Over The Grade' to ride the Pismo State Beach. I will do all that is possible for me to do to keep the Equestrian World from losing even More space ... please reconsider this allotment of only 5 parking spaces for horse and rider.

Thank you,

Jeanne

"My treasures do not clink together or glitter, they gleam in the sun and neigh in the night."

[jeanniekeeffe@mac.com](mailto:jeanniekeeffe@mac.com)

Fellow Equestrians:

**You must respond by 5:00 p.m. on Friday 1/28/11** by e-mail to [mreents@swca.com](mailto:mreents@swca.com) to The Draft Environmental Impact Report for the Grover Beach Lodge and Conference Center which is proposing ONLY 5 horse trailer parking spaces (no dimension listed) to ride on Pismo Beach (equestrians only access to ride on Pismo State Beach).

I have attached the:

Notice of Availability of Draft EIR and Notice of Public Hearing

Equestrian Portion of DEIR

Equestrian Survey (Figure F) showing how they determined equestrians only need 5 parking spaces.

To view the entire report you can go to [www.grover.org](http://www.grover.org) and search DEIR.

You will notice the survey was done when most schools were already in session and vacationers gone home, for five day periods beginning August 5, 2010 through September 12, 2010,

and only done in the afternoons when most equestrians are already done riding and gone home. This snapshot in time also includes Labor Day Weekend weeks when most equestrians stay away from the beach when it is jam packed with visitors with their ATVs. We have all seen 25 and more horse trailer rigs with many 4 horse trailers and larger rigs parked in the lot. With only 5 parking spaces planned, if you come to ride Pismo Beach there will be a **very** high likelihood you will have no place to park and therefore not be able to ride. Group rides would be impossible.

When the Oso Flaco Lakes trailer access closed State Parks agreed to provide a minimum of 25 trailer parking spaces for equestrians at the site of the lodge but it is now being downsized to 5 (of an unknown size). We also need space to tie our horses to the sides of our trailers, unload buggies, unload horses from side load trailers, accommodate 4 and 6 horse trailers, and motor homes with horse trailers.

**You must respond with your comments by 5:00 p.m. on Friday 1/28/11** by e-mail to [mreents@swca.com](mailto:mreents@swca.com).

Please feel free to share this e-mail with fellow equestrians.

**JK-4  
(cont'd)**

**JK-5**

**JK-6**

**JK-7**

**JK-1**

**JK-2**

**JK-3**

**JK-4**

**Response to Email from Jeannie Keefe, dated January 14, 2011**

Comment No.	Response
JK-1	This comment states that five equestrian parking spaces are not enough. Please refer to Master Response EQ-5.
JK-2	The comment points out that many equestrians come from outside of Grover Beach and/or San Luis Obispo County to ride at Pismo State Beach. Refer to Master Response EQ-2. Please also refer to Master Response EQ-5 related to the provision of five parking spaces.
JK-3	The comment discusses the process and deadline for commenting on the Draft EIR and does not contain any substantive comments or questions about the EIR. No further response is necessary.
JK-4	This comment discusses the equestrian parking survey times and dates. Please refer to Master Response EQ-2.
JK-5	This comment states that there is a high likelihood that parking will be unavailable, and group rides will be impossible, if only five equestrian parking spaces are allowed. Please refer to Master Response EQ-5.
JK-6	This comment refers to an agreement to provide a minimum of 25 trailer parking spaces when State Parks closed trailer access at Oso Flaco Lake. Please refer to Master Response EQ-13.
JK-7	The comment discusses the need for spaces to tie horses to the sides of trailers, load and unload buggies, and accommodate large trailers and motor homes with trailers. Please refer to Master Response EQ-3.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:50 PM  
**To:** Emily Creel  
**Subject:** FW: Horse Trailer Parking

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**From:** sandra erb kramp [mailto:sekramp@yahoo.com]  
**Sent:** Fri 1/14/2011 2:54 PM  
**To:** Mary Reents  
**Subject:** Horse Trailer Parking

To Whom it may Concern, 1-14-11

I am a homeowner in Oceano. I have recently purchased a trailer for my horse in hopes of going to the beach to ride. I purchased from a local resident and paid the taxes. My next step would be to buy a truck from a local dealer. I would like to be assured that there will be adequate parking before I make such a large purchase.

SK-1

I believe the original amount of 25 spaces is more appropriate than the 5 you are now proposing. As with most parking plans made years in advance there must be adjustments. Usually thats to INCREASE slots because of growing demands and population not decrease.

SK-2

I would be happy to get a list of trailer owners in AG, Pismo, GB, Oceano, and Nipomo, who use the beach.

SK-3

Please remember that local business prophets from local riders!

SK-4

Sincerely,  
Sandra Kramp  
1417 23rd St  
Oceano, Ca. 93445  
805 305 9778

**Response to Email from Sandra Kramp, dated January 14, 2011**

Comment No.	Response
SK-1	This comment discusses the need to know sufficient parking would exist at Pismo State Beach before significant equestrian purchases are made. The EIR very conservatively estimated that on average, five horse trailers were utilizing the parking area at any given time. The proposed 10-15 space area would be sufficient to meet equestrian needs on most days. Please also refer to Master Responses EQ-1 related to the potential loss of equestrian parking and EQ-2 regarding the determination of average equestrian usage.
SK-2	The comment suggests providing 25 spaces, rather than five. Please refer to Master Responses EQ-1, EQ-5, and EQ-12, related to the number of equestrian spaces to be provided. The commenter states that typically parking plans are made to increase parking because of growing demands and populations. The project has been designed to retain existing on-site parking (all 160 public spaces as well as equestrian parking). CEQA requires a review of the project to determine whether or not it would significantly impact existing conditions. Because all existing parking is being accommodated, the EIR did not conclude that any significant impacts to parking would occur.
SK-3	The commenter offers to gather a list of trailer owners in the project vicinity who use the beach. Thank you for the assistance; the offer will be forwarded to the City for their consideration.
SK-4	The comment states that local businesses profit from local riders. Please refer to Master Response EQ-11 regarding the economic benefits of equestrian use.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:26 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Lodge and Conference Center

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**From:** Bnaylor [mailto:bnaylor4@sbcglobat.net]  
**Sent:** Fri 1/14/2011 5:05 PM  
**To:** Mary Reents  
**Subject:** Grover Beach Lodge and Conference Center

To Whom It Concerns:

I would like to express my concern about the Environmental Report on Grover Beach. The amount of parking for equestrians is too limited. It does not appear to take into consideration the larger living quarters/horse trailer for parking. I have a three horse/living quarters trailer (goose neck) and need a 45 foot parking stall. Please be advised that horse trailers also need double the width of a normal parking stall to tie up horses while being saddled. Many do not understand the economic impact the horse industry has in the State. It is well into the billions of Dollars.

**BN-1**  
**BN-2**  
**BN-3**

Many agencies, Cities, Counties, State, and Federal, utilize volunteer mounted groups and individuals to help patrol and monitor public areas for the public good. I personally belong to three volunteer groups and put in close to 1,000 volunteer hours per year helping to monitor and protect our natural resources on horseback. One group I belong to helps LA County Parks and put in over 2,500 hours last year alone.

**BN-4**

I hope you will take these concerns into consideration prior to finalizing your report.

Sincerely,

Bill Naylor

**Response to Email from Bill Naylor, January 14, 2011**

Comment No.	Response
BN-1	This comment states that parking for equestrians is too limited. Please refer to Master Response EQ-1 regarding the potential loss of equestrian parking spaces, Master Response EQ-2 regarding adequacy of the parking survey, and Master Response EQ-5 regarding the sufficiency of five parking spaces.
BN-2	The comment discusses the dimensions and spaces needed to accommodate large horse trailers and horse staging activities. Please refer to Master Comment EQ-3 regarding design and safety of the equestrian parking area.
BN-3	This comment raises the issue of the economic impact that the horse industry has on the state. Please refer to Master Response EQ-11 related to economic benefits of equestrian use.
BN-4	The commenter discusses his participation in various volunteer mounted groups that help patrol and monitor public areas for the public good and to help protect our natural resources. We recognize the benefit these groups provide to local communities and state-wide and the hours spent advocating these causes, and appreciate your service in these organizations.

**Emily Creel**

**Subject:** FW: Grover Beach Parking for Equestrians

**From:** patricia rogers [mailto:peppermint35@gmail.com]  
**Sent:** Fri 1/14/2011 3:46 PM  
**To:** Mary Reents  
**Subject:** Grover Beach Parking for Equestrians

To whom it may concern:

I am very concerned about the issue of parking for horse trailers when the proposed development takes place at the corner of Grande Avenue and Highway 1 in Grover Beach. I have never felt that I had a right to do something because I have lived here longer than someone else or enjoyed a certain quiet area or private area longer than someone else. I do believe, however, we all have the right to enjoy the state parks equally. After all, we all pay taxes equally don't we?

PR-1

I am beginning to wonder why kiteboarders, shoppers, diners, RVers, motorcyclists, and just plain imprudent drivers have more rights than I do to quietly ride my horse up and down the beach.

I believe that the findings for the EIR regarding 5 horsetrailer spaces (size unknown) is absurd. On any given good weather day, particularly in the morning, there can be as many as 20 horse trailers parked in the area currently used for that purpose (not to mention the trucks and RV's with motorcycle trailers who randomly park in the middle of the area). Many of the members of our horse community avoid the beach in the afternoon because of the wind, and the weekends because of the aforementioned users.

PR-2

PR-3

There is also an advantage to having horsebackriders on the beach, not to mention the good PR. I've never ridden on the beach without people coming up and asking to pet my horse, or being amazed that there is still an area where people can do this. In addition, most riders, along with the CMA group, will look out for unusual things going on in the dunes such as trash, a wayward bicycle, unauthorized camping, etc, and report it to the park rangers.

PR-4

Please reconsider the space you are allotting for horse trailers. Equestrians need at least as much space as they have enjoyed in the past as there are more and more groups coming to the area to do this. It is a special thing, and we should all be able to enjoy the beach equally.

PR-5

Thank you.

Patty Rogers  
Horse Owner/ Taxpayer  
Nipomo, Ca

**Response to Email from Patty Rogers, January 14, 2011**

Comment No.	Response
PR-1	The commenter states that we all have the right to enjoy the state parks equally and questions why kiteboarders, shoppers, diners, RVers, motorcyclists, and just plain imprudent drivers have more rights than she does to quietly ride her horse up and down the beach. Please refer to Master Response EQ-4 related to equestrian beach access issues.
PR-2	This comment claims that the finding regarding five horse trailer spaces is absurd. Please refer to Master Response EQ-5 regarding the finding and sufficiency of five equestrian parking spaces.
PR-3	This comment discusses the tendency of equestrians to avoid the beach during afternoons and weekends because of winds and crowding. It is noted that equestrian users are selective in the days/times they choose to go to the beach, just as all other users would be. As the comment relates to the adequacy of the equestrian parking survey, please refer to Master Response EQ-2.
PR-4	The City recognizes and appreciated the benefits and advantages provided by equestrians at Pismo State Beach. That has been a guiding factor in the City's efforts at preserving that use at this location. The EIR preparers feel that the proposed project has adequately protected this use through design of an individual parking area for these users with capacity to meet average and above-average usage. Please refer to Master Response EQ-2 for additional information.
PR-5	The commenter states that equestrians need at least as much space as they have had in the past as there are more groups coming to the area to ride at Pismo State Beach. Please refer to Master Responses EQ-1, EQ-2, and EQ-4 related to equestrian parking and beach access issues.

**Emily Creel**

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**Subject:** FW: Trailer parking on Grand Ave.

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**From:** Janet Sally [mailto:janetsally@gmail.com]

**Sent:** Fri 1/14/2011 11:58 AM

**To:** Mary Reents

**Subject:** Trailer parking on Grand Ave.

I am writing to state my opposition to the proposal to limit the area of horse trailer parking at the staging site on Grand Ave. This is a well used, popular place to ride and the riders are respectful. So many people count on the ability to come to the dunes for a short, or long ride. Thank you for allowing me to express my opinion.  
Janet Sally-Lee

JSL-1

**Response to Email from Janet Sally-Lee, dated January 14, 2011**

<b>Comment No.</b>	<b>Response</b>
JSL-1	The commenter states her opposition to the proposal to limit the area of horse trailer parking at the staging site on Grand Avenue. Please refer to Master Response EQ-1 related to the potential loss of equestrian parking spaces.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:26 AM  
**To:** Emily Creel  
**Subject:** FW: Horse trailer parking

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**From:** Lenore and Gary Spelbring [mailto:nogrownups2@gmail.com]  
**Sent:** Fri 1/14/2011 8:08 PM  
**To:** Mary Reents; robert dodds  
**Subject:** Horse trailer parking

The proposed Horse trailer for five trailers is inadequate. I am at the beach at least five days a week, sometimes with my horse sometime without. There are frequently 10 or more trucks and horse trailers parked.

LS-1

Visitors love to see the horses on the beach. This will come to a halt as many equestrians will think about loading up horses, driving to the beach only to be turned away due to inadequate parking.

LS-2

This is the only area for parking a horse trailer. Please reconsider this proposal.

LS-3

Thank you for your consideration

Lenore Spelbring

Home owner  
Arroyo Grande

**Response to Email from Lenore Spelbring, January 14, 2011**

Comment No.	Response
LS-1	The comment states that the proposed horse trailer parking for five trailers is inadequate, and that there are frequently 10 or more trucks and trailers parked at the project location. Please refer to Master Response EQ-5 regarding the finding and sufficiency of five equestrian parking spaces. Note that the proposed project would accommodate a minimum of 10 horse trailers at the site.
LS-2	The commenter points out the benefit of seeing horses on the beach. The City recognizes that this is an important recreational use of this area, and in conjunction with the project applicant, has made specific provisions for equestrian parking to protect this use. Please also refer to Master Responses EQ-1 and EQ-2 related to equestrian parking needs and spaces to be provided.
LS-3	The comment states that this is the only area for parking a horse trailer. The EIR analyzes various locations for horse trailer parking at the project site as well as three offsite locations, and different project site designs would be able to accommodate a wide range of alternative locations for on-site equestrian parking.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:51 PM  
**To:** Emily Creel  
**Subject:** FW: Pismo

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**From:** Susanspicer47@aol.com [mailto:Susanspicer47@aol.com]  
**Sent:** Fri 1/14/2011 2:15 PM  
**To:** Mary Reents  
**Subject:** Pismo

5 horse trailer parking places is not enough for this popular equestrian area. I come from So Cal to ride and I need to know I have a chance to have a place to park. This would require me to find street parking and that is not very safe. Please provide more spaces for trailer parking!

Thank you,  
Susan Spicer

| **SSp-1**  
| **SSp-2**  
| **SSp-3**

**Response to Email from Susan Spicer, dated January 14, 2011**

<b>Comment No.</b>	<b>Response</b>
SSp-1	The commenter states that five horse trailer parking spaces are not enough for this popular equestrian area. Please refer to Master Response EQ-5.
SSp-2	The commenter states that she drives from southern California to ride on Pismo Beach and needs to know she has a chance at finding parking. Please refer to Master Comment EQ-2 related to parking for out-of-area users.
SSp-3	This comment raises safety issues related to parking on the street and the need for more parking for horse trailers. It is agreed that parking on the street would raise potential safety concerns for equestrians, adjacent traffic, and other beach users. However, parking for 10 to 15 equestrian trailers has been proposed, which appears sufficient to accommodate equestrian demand at the site on most occasions. Therefore, this impact is considered insignificant. Please also refer to Master Response EQ-3 regarding design and safety of the equestrian parking area.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:56 PM  
**To:** Emily Creel  
**Subject:** FW: DEIR - Grover Beach Lodge Equestrian Parking

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**From:** Susan [mailto:scswag@verizon.net]  
**Sent:** Fri 1/14/2011 12:30 PM  
**To:** Mary Reents  
**Subject:** DEIR - Grover Beach Lodge Equestrian Parking

Ms Reents,

I am sending this email in the hopes that the proposed Equestrian parking be increased to allow a minimum of 25 truck & horse trailer combinations. I have lived in this area since 1997 and been riding horses since 2000. More and more public land is being taken away from Equestrians; however, we still support many local businesses through our sport and taxes. A few come to mind feed stores (Lemos & Farm Supply), equipment stores, Veterinarians, local boarding facilities, trainers etc.

SSw-1

SSw-2

Currently the areas we can legally ride are the Woodlands, Lake Lopez, Montano de Oro, the beach at the Dunes, and recently opened Los Flores Park in Santa Maria. On most days the parking lot at the Woodlands is full with only 6 spaces that is very easy to pull in and out, the Los Flores park has a wonderful parking area where we can pull our trailers in and easily pull out to get to the freeway, A recent survey of horse trails at the Dunes didn't seem to be done at times when most Equestrians go to the beach. I feel this was an un fair survey and needs to be done in the mornings and weekends for a minimum of two weeks in good weather.

SSw-3

SSw-4

In order for us to enjoy our sport we use horse trailer's like the hundreds of ATV'ers use to transport their vehicles to the Dunes. We need an area to not only to park our truck & trailers but to unload and tack up our horses. We do not want to interfere with the ATV'ers, hikers, surfers or anyone else who enjoys our beaches. We just want our small share of space to enjoy our sport. I see skate parks, baseball fields, soccer fields, dog parks, golf courses; let alone the acres for ATV'ers at the dunes. I pay taxes; property and sales tax in SLO County and I wonder why our County doesn't feel I have a right to a place to enjoy my sport. The group Ride Nipomo does a wonderful job helping with community outreach and work tirelessly to keep what trails we have cleaned up. Which at times include picking up household items dumped alongside the local roads & Blacklake Canyon in Nipomo. I think just their efforts alone in helping our community should be rewarded by a section of the Dunes area with adequate parking.

SSw-5

SSw-6

SSw-7

Sincerely,

Susan Swagerty  
Nipomo, CA

**Response to Email from Susan Swagerty, dated January 14, 2011**

Comment No.	Response
SSw-1	The commenter requests that the project be amended to provide a minimum of 25 parking spaces for truck and horse trailer combinations. Please also refer to Master Responses EQ-1 regarding a potential loss of equestrian parking spaces and EQ-12 related to the understanding that 25 parking spaces would be provided.
SSw-2	This comment discusses the various ways equestrians support local business. Please refer to Master Response EQ-11 regarding the economic benefit of equestrian uses.
SSw-3	The comment discusses the areas where equestrians can legally ride along the central coast, but does not include any substantive comments or statements on the EIR. No further response is necessary.
SSw-4	This comment requests that another survey of equestrian parking be done in the mornings and weekends in good weather. Please refer to Master Response EQ-2 related to the adequacy of the equestrian parking survey.
SSw-5	The comment states that equestrians need not only a place to park, but also space to unload and tack up their horses. Please refer to Master Response EQ-3 regarding design of the parking area.
SSw-6	The commenter discusses the equestrians' right to use the beach along with all other users and states that San Luis Obispo County is not recognizing their right to a place to enjoy their sport. Please refer to Master Response EQ-4 related to equestrian beach access issues.
SSw-7	This comment discusses the volunteer community outreach and service work performed by the group Ride Nipomo. Their efforts are appreciated and acknowledged as a benefit to surrounding communities. No further response is necessary.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:56 PM  
**To:** Emily Creel  
**Subject:** FW: trailer space Equine

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**From:** Janis Tremper [mailto:jtremper@fs.fed.us]  
**Sent:** Fri 1/14/2011 12:35 PM  
**To:** Mary Reents  
**Subject:** trailer space Equine

Janis Tremper USFS  
Santa Lucia Ranger District  
1616 North Carlotti Drive  
Santa Maria, Ca. 93454-1604  
805-925-9638

My name is Janis and my friends and I always ride early in the morning. I have heard you did a survey on trailer in the afternoon in the parking lot. Its seems most riders like the mornings as there are not as many people kites etc... Please considered re doing the survey as we need more than 5 spaces for trailers.

JT-1  
JT-2

Thank you so much

Janis Tremper

**Response to Email from Janis Tremper, dated January 14, 2011**

Comment No.	Response
JT-1	The commenter states that she and her friends typically ride early in the morning to avoid crowds, kites, etc., and questions the survey of trailers in the lot during the afternoons. Please refer to Master Response EQ-2 regarding the adequacy of the equestrian parking survey.
JT-2	This comment states that the equestrians need more than five spaces for trailer parking. Please refer to Master Response EQ-5.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 14, 2011 3:57 PM  
**To:** Emily Creel  
**Subject:** FW: equestrian parking GB plan

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**From:** Linda Walden [mailto:jetspirit@gmail.com]  
**Sent:** Fri 1/14/2011 12:03 PM  
**To:** Mary Reents  
**Cc:** Linda Walden  
**Subject:** equestrian parking GB plan

Equestrians NEED up to 25 minimum parking spaces reserved solely for horse trailers and horses.

| **LW(a)-1**

Planning for 5 spaces is just totally off center; the survey days and times were inadequate and need to properly adjusted to take into facts the time of day, week or weekend, summer, spring winter, fall and single riders up to large groups of riders in order for an accurate setting of the number of spaces needed.

| **LW(a)-2**

| **LW(a)-3**

Please ensure that other and more accurate and adequate surveys are done. If help is needed in this endeavor, call on the riders who consider the beach a wonderful outing for both horses and riders. Don't shut out a major group of SLOCO's users.

| **LW(a)-4**

Linda Walden  
Nipomo, CA.

**Response to Email from Linda Walden, dated January 14, 2011**

Comment No.	Response
LW(a)-1	This comment states that equestrians need up to a minimum of 25 spaces reserved solely for horse trailers and horses. Refer to Master Responses EQ-1, EQ-2, and EQ-12 for additional information.
LW(a)-2	The comment states that planning for five spaces is off center. Please refer to Master Response EQ-5.
LW(a)-3	This comment claims that the survey days and times were inadequate to accurately determine the number of equestrian spaces needed. Please refer to Master Response EQ-2 regarding the adequacy of the equestrian parking survey.
LW(a)-4	The commenter requests that the City not shut out a major group of San Luis Obispo County's beach users. Please refer to Master Response EQ-4 relating to equestrian beach access issues.

Jerry Williams  
Board member; Ride Nipomo  
Committee member; TAC  
1270 Humboldt Dr.  
Nipomo, CA 93444  
805.929.3212  
jerry@williams.ms

January 14, 2011

RE: The Draft Environmental Impact Report for the Grover Beach Lodge and Conference Center.

Specifically; Equestrian Survey (Figure F) showing equestrians only need 5 parking spaces.

To Whom it Concerns;

The survey you published in the for mentioned document is grossly inadequate to determine the equestrians needs for staging area for horse back riding on the dunes. The time frame is only reflective of a short span of two months and reflects stats taken only across afternoon hours, it does not encompass the true usage as observed by those who use the staging areas. So it's obvious to the equestrian community that the equestrian usage of the dunes has taken a low priority in the quest to capitalize on the values the lodge and convention center for the city. A comprehensive study would defiantly reflect other trends not demonstrated in you study. I would ask the question; Where is this studies outline defining the criteria needed to provide a comprehensive evaluation of the communities equestrian needs for the dunes area? I would surmise due to the lack of one being referenced in this report that it at any level, one was not prepared and does not exist. Therefore be warned that what your survey reflects is just a quick arbitrary accounting not preformed with any valid scientific methodology.

It would seem the equestrians in this county, local adjacent cities, coastal region, and those equestrians in Grove Beach are being minimized in this effort to make this project come to fruition, I personally have must draw the conclusion from this shoddy study that the equestrians are being minimized due possibly to, the cost of developing a comprehensive staging area of size to accommodate the true usage that would be reflected in a scientific study. These motivations may back-fire on the project due to the equestrian community engaging possible legal processes that will further delay the project. No one wants this.

The equestrian community has stated to the project community at all of public meetings that the true usage of the dunes on many days can be ten or twelve units, and when clubs stage for rides along with private riders using the area it can be as many as twenty or

thirty units of various sizes off loading, loading, and tacking animals.

It would be in the best interest of this project to realistically accommodate the historical usage of the dunes for the equestrian community. We are doctors, lawyers, business people, civil servants, engineers, home owners, and visitors from all the above from around the area. Horse back riding is a expensive hobby, we are part of the core of this community both as citizens and are part of the primary tax base of the areas, we want our equestrian availability recognized not minimized with a token staging area. We only want to supplement what we already have with new equal space to accommodate our real usage and profile. Our profile should not be minimized, our dune riding history should be endeared in this project to protect the flavor of who lives and plays here. We live here, we play here now! Please don't attempt to destroy part of the extreme recreational value of the area by minimizing the equestrian community for other goals!

Jerry A. Williams

JW-3 (cont'd)

JW-4

JW-1

JW-2

JW-3

**Response to Letter from Jerry Williams, dated January 14, 2011**

Comment No.	Response
JW-1	This comment addresses the adequacy of the equestrian parking survey conducted by State Parks. Please refer to Master Response EQ-2.
JW-2	This comment states that equestrian uses in this county are being minimized because of the cost of developing a parking area that would accommodate the true usage of the site. Please refer to Master Responses EQ-2 regarding the adequacy of the parking usage survey and EQ-4 regarding equestrian beach access issues.
JW-3	The comment states that true equestrian usage of the dunes is 10 to 12 units, and can be as high as 20 to 30 units when clubs stage for rides. Please refer to Master Comments EQ-1 and EQ-2 regarding the amount of equestrian parking.
JW-4	The commenter claims that the equestrian profile should not be minimized with a "token staging area" but should instead reflect the realistic historical usage of the dunes for the equestrian community. Please refer to Master Responses EQ-2 regarding the adequacy of the equestrian parking survey, EQ-11 related to the economic benefits of equestrian uses, EQ-4 for information on beach access, and EQ-6 regarding the appropriateness of commercial development at this location.

**Emily Creel**

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**Subject:** FW: pismo beach horse trailer parking

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**From:** windyjesse@aol.com [mailto:windyjesse@aol.com]

**Sent:** Sat 1/15/2011 10:22 PM

**To:** Mary Reents

**Subject:** pismo beach horse trailer parking

It is not right to put restrictions on the horse trailer parking at pismo beach. Limiting it to five horse trailers is ridiculous. Outdoor activities of this nature are healthy and what the beach access are all about. Jean L. Boyd

| JLB-1

| JLB-2

**Response to Email from Jean L Boyd, dated January 15, 2011**

Comment No.	Response
JLB-1	This comment relates to limiting parking to space for five horse trailers and restrictions on horse trailer parking at the beach. Please refer to Master Response EQ-1 related to the potential loss of equestrian parking spaces and EQ-5 regarding the sufficiency of five parking spots for horse trailers.
JLB-2	The comment points out that outdoor activities such as equestrian riding are what beach access is all about. The benefits of this recreational use are recognized by the City and project applicant. No further response is necessary.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:24 AM  
**To:** Emily Creel  
**Subject:** FW: Horse parking

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**From:** cmbyrd12@yahoo.com [mailto:cmbyrd12@yahoo.com]  
**Sent:** Sat 1/15/2011 7:34 PM  
**To:** Mary Reents  
**Subject:** Horse parking.

Have been riding at pismo for close to 20 years. It is an amazing recreational spot for equestrians and hugely unfair to put on such restrictions. It would be a great disservice to us in the equestrian community to limit our parking. Surely accommodations can be made.

Regards, Carla Byrd

Sent from my iPhone

CB-1

**Response to Email from Carla Byrd, dated January 15, 2011**

<b>Comment No.</b>	<b>Response</b>
CB-1	This comment relates to restrictions on equestrian parking at the project location. Please refer to Master Response EQ-1 related to the potential loss of equestrian parking spaces.

Emily Creel

El-Jay Hansson

From: Mary Reents  
Sent: Tuesday, January 18, 2011 8:24 AM  
To: Emily Creel  
Subject: FW: Grover Beach Parking

From: Hans & El-Jay Hansson [mailto:hansson@verizon.net]  
Sent: Sat 1/15/2011 12:09 PM  
To: Mary Reents  
Subject: Grover Beach Parking

EL-JAY HANSSON AND FAMILY  
2316 Idyllwild Place  
Arroyo Grande, California 93420  
805/343-1949

January 15th, 2011

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street C200  
San Luis Obispo, Ca. 93401

Reference: Proposed Convention Center EIR

Gentlemen:

We understand that the draft EIR is coming up for closure, and there are several items that must be modified, especially the equestrian parking.

EJH(a)-1

The proposed area across the street from the convention center, sounds plausible, but it is pretty obvious the Coastal Commission will reject the development of more of the dunes. Unless the developer gets permission "in writing" from the Coastal Commission, it is a useless suggestion.

Also the survey on vehicles using the present area is terribly flawed. No mornings?? No Tuesdays or Wednesdays? What about group rides that occur on a weekly basis?

EJH(a)-2

This area has been used for many years, so would not prescriptive rites come into play?

EJH(a)-3

Please do not approve this EIR until a proper mitigation is made regarding the equestrian parking. Remember there must be room on the side of the vehicles to tie the horses as they get saddled and/or cool down. There is a need for at least 25 parking spaces.

EJH(a)-4  
EJH(a)-5

Sincerely

**Response to Email from El-Jay Hansson, dated January 15, 2011**

Comment No.	Response
EJH(a)-1	The comment related to the proposed location of equestrian parking in the dune area, which the Coastal Commission has previously indicated would not be allowed. Please refer to Master Response EQ-7 related to this issue.
EJH(a)-2	This comment challenges the sufficiency of the parking survey based on the failure to include morning and Tuesday and Wednesday counts. Please refer to Master Response EQ-2 related to the adequacy of the equestrian parking survey.
EJH(a)-3	This comment asks whether prescriptive rights for equestrian uses have been established at the project location. Refer to Master Response EQ-1 for a discussion of prescriptive rights.
EJH(a)-4	The commenter states that there must be adequate room on the side of the vehicles to tie horses as they get saddled and/or cool down. Please refer to Master Response EQ-3 related to design of the equestrian parking area.
EJH(a)-5	The commenter states that there is a need for at least 25 parking spaces. Please refer to Master Responses EQ-1, EQ-2, EQ-4, and EQ-12 for additional information.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:24 AM  
**To:** Emily Creel  
**Subject:** FW:

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**From:** Mary Wunder [mailto:wundermary@yahoo.com]  
**Sent:** Sat 1/15/2011 9:33 PM  
**To:** Mary Reents  
**Subject:**

More horse trailer spaces are need at Grover Beach

| **MW-1**

MAY GOD HOLD YOU IN THE PALM OF HIS HAND UNTIL WE MEET AGAIN,  
Praiselujah!

**Response to Email from Mary Wunder, dated January 15, 2011**

<b>Comment No.</b>	<b>Response</b>
MW-1	The commenter states that more horse trailer parking spaces are needed at Grover Beach. Please also refer to Master Responses EQ-1 related to the potential loss of equestrian spaces, EQ-2 related to the equestrian parking survey, and EQ-4 regarding beach access issues.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:22 AM  
**To:** Emily Creel  
**Subject:** FW: Equestrian Parking

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**From:** Marci Baskin [mailto:mkloebel@yahoo.com]  
**Sent:** Sun 1/16/2011 10:36 AM  
**To:** Mary Reents  
**Subject:** Equestrian Parking

I am opposed to the current proposal for equestrian parking at the end of Grand Ave. in Grover Beach. Whoever is making this decision has no concept of space required to park, unload, and saddle a horse oh, and what about a trailer that comes in with 6 horses to unload. Yes, many times large trailers come in and a group of riders abound. This was a designated area and now because of the almighty dollar your recognition of our right to have this space is dismissed. The experts now believe that only a minimum space is sufficient. Please make note of my opposition. I ride the beaches and have 3 horses.

**MB-1**

**MB-2**

Marcia Baskin

**Response to Email from Marcia Baskin, dated January 16, 2011**

<b>Comment No.</b>	<b>Response</b>
MB-1	This comment discusses the space needed to park, unload, and saddle a horse with vehicles as large as a six-horse trailer. Please refer to Master Response EQ-3 related to the design and safety of the equestrian parking area.
MB-2	The commenter states that the project site was a designated area and that the City's recognition of the equestrians' right to have this space is being diminished as the experts believe that only a minimum space is sufficient. Note that although State Parks has allowed this use in the past, there is no established "right" of equestrians to use this area for parking. Please refer to Master Responses EQ-4 and EQ-13 regarding equestrian beach access issues and established uses.

Emily Creel

From: Mary Reents  
Sent: Tuesday, January 18, 2011 8:21 AM  
To: Emily Creel  
Subject: FW: - Equestrians we NEED your support - you must respond by 5:00 p.m. on Friday 1/28/11

From: Karl and Laurie Gage [mailto:fullsail@onemain.com]  
Sent: Sun 1/16/2011 8:29 PM  
To: Mary Reents  
Subject: Fw: - Equestrians we NEED your support - you must respond by 5:00 p.m. on Friday 1/28/11

Please consider the comments below - they make a good point regarding when the studies were done and other salient points. Thank you.

Laurie Gage

[fullsail@onemain.com](mailto:fullsail@onemain.com)

Fellow Equestrians:

**You must respond by 5:00 p.m. on Friday 1/28/11** by e-mail to [mreents@swca.com](mailto:mreents@swca.com) to The Draft Environmental Impact Report for the **Grover Beach Lodge and Conference Center** which is proposing ONLY 5 horse trailer parking spaces (no dimension listed) to ride on Pismo Beach (equestrians only access to ride on Pismo State Beach).

I have attached the:

Notice of Availability of Draft EIR and Notice of Public Hearing

Equestrian Portion of DEIR

Equestrian Survey (Figure F) showing how they determined equestrians only need 5 parking spaces.

To view the entire report you can go to [www.grover.org](http://www.grover.org) and search DEIR.

You will notice the survey was done when most schools were already in session and vacationers gone home, for five day periods beginning August 5, 2010 through September 12, 2010, and only done in the afternoons when most equestrians are already done riding and gone home. This snapshot in time also includes Labor Day Weekend weeks when most equestrians stay away from the beach when it is jam packed with visitors with their ATVs. We have all seen 25 and more horse trailer rigs with many 4 horse trailers and larger rigs parked in the lot. With only 5 parking spaces planned, if you come to ride Pismo Beach there will be a very high likelihood you will have no place to park and therefore not be able to ride. Group rides would be impossible.

LG-1

When the Oso Flaco Lakes trailer access closed State Parks agreed to provide a minimum of 25 trailer parking spaces for equestrians at the site of the lodge but it is now being downsized to 5 (of an unknown size). We also need space to tie our horses to the sides of our trailers, unload buggies, unload horses from side load trailers, accommodate 4 and 6 horse trailers, and motor homes with horse trailers.

**You must respond with your comments by 5:00 p.m. on Friday 1/28/11** by e-mail to [mreents@swca.com](mailto:mreents@swca.com).

LG-2

Please feel free to share this e-mail with fellow equestrians.

LG-2  
(cont'd)

**Response to Email from Laurie Gage, dated January 16, 2011**

<b>Comment No.</b>	<b>Response</b>
LG-1	The comment requests consideration of comments set out later in the letter, pointing out that several salient points are made. The comment does not contain any substantive comments or questions about the EIR and no further response is necessary.
LG-2	This comment is substantially identical to Comments JK-3 through JK-7, above. Please refer to the responses to those comments.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:22 AM  
**To:** Emily Creel  
**Subject:** FW: Horse Trailer parking

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**From:** Susan Holt [mailto:twobayhorses@msn.com]  
**Sent:** Sun 1/16/2011 9:38 AM  
**To:** Mary Reents  
**Subject:** Horse Trailer parking

Hi,

I am writing to protest the change in parking for horse trailers. 5 spaces is simply not enough to accommodate the equestrians who want to enjoy Pismo Beach.

| **SHo-1**

I sincerely hope this decision will be re-considered.

Regards,

Susan Holt  
San Luis Obispo, CA

**Response to Email from Susan Holt, dated January 16, 2011**

<b>Comment No.</b>	<b>Response</b>
SHo-1	The commenter states that five spaces is not enough to accommodate the equestrians who want to enjoy Pismo Beach. Please refer to Master Responses EQ-2 regarding the equestrian parking survey and EQ-5 related to the sufficiency of five parking spaces.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:21 AM  
**To:** Emily Creel  
**Subject:** FW: Equestrian Access

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**From:** CBA01@aol.com [mailto:CBA01@aol.com]  
**Sent:** Sun 1/16/2011 6:08 PM  
**To:** Mary Reents  
**Subject:** Equestrian Access

It is vital to the tourism attractions of Pismo Beach to continue the long standing practice of providing access to the trails of Pismo Beach and in this regard to provide safe parking for trailers and vehicles. Failure to do so may eventually discourage equestrian tourists from considering Pismo Beach a prime destination but in the short term, it will result in hazardous conditions for the people who do arrive (as well as the locals who ride the beach) from having safe parking. Since this issue has been discussed, to ignore the common sense plan of providing safe access as outlined in the city plans, you are disregarding the needs of travelers and tourists alike and creating a potential legal liability for the city.

CGS-1

Please plan safe accommodations for the equestrians.

Christina Sugarman DC  
Gerald Sugarman ESQ

**Response to Email from Christina and Gerald Sugarman, dated January 16, 2011**

<b>Comment No.</b>	<b>Response</b>
CGS-1	This comment addresses the need for safe parking for trailers and vehicles at Pismo Beach. Please refer to Master Responses EQ-1, EQ-2, and EQ-3 related to the need, adequacy and design and safety of the proposed equestrian parking area.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:20 AM  
**To:** Emily Creel  
**Subject:** FW: Oppose the limited space for horse trailers

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**From:** CJ Foglietta [mailto:cfoglietta@yahoo.com]  
**Sent:** Mon 1/17/2011 9:15 PM  
**To:** Mary Reents  
**Subject:** Oppose the limited space for horse trailers

Unacceptable..This is a miniscule amount of space and differs drastically from what we were told.  
I totally oppose the Environmental Impact Report for the **Grover Beach Lodge and Conference Center** for ONLY 5 horse trailer parking spaces (no dimension listed) to ride on Pismo Beach (equestrians only access to ride on Pismo State Beach).

CJF(a)-1

"You will always be lucky if you know how to make friends with animals." -peter  
Adopt your next pet from a shelter. <http://www.petfinder.com/pet-adoption>

**Response to Email from CJ Foglietta, dated January 17, 2011**

Comment No.	Response
CJF(a)-1	The comment states that the proposed equestrian parking area is a miniscule amount of space and differs drastically from what equestrians were told they would be provided. Please also refer to Master Responses EQ-12 related to the understanding that 25 spaces would be provided. Also refer to Master Responses EQ-2 related to adequacy of the parking survey and EQ-5 regarding the sufficiency of five equestrian parking spaces.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:20 AM  
**To:** Emily Creel  
**Subject:** FW: Horse Staging Area Concern

**From:** jkeyes [mailto:jkeymac@ocsnet.net]  
**Sent:** Mon 1/17/2011 3:16 PM  
**To:** Mary Reents  
**Subject:** Re: Horse Staging Area Concern

Hello;

I am John Keyes Chairman for the California Equestrian Trails and Lands Coalition.  
 I am sending this letter to find out if anything there is anything CET&LC needs to send to you concerning the Pismo Horse Staging Area? I sent to you on July 22, 2010 a letter concerning this area. Will this letter be sufficient? Or do you need another response from CET&LC?

John Keyes

Chairman: CET&LC  
 On Jul 22, 2010, at 9:16 AM, Mary Reents wrote:

> Thank you for your letter. It will be included with the responses  
 > received at the Scoping meeting and will be contained in the Notice of  
 > Preparation portion of the EIR. We will also address your concerns as  
 > part of the review of the project.

>  
 > Mary B. Reents  
 > Senior Consultant  
 > SWCA Environmental Consultants  
 > 1422 Monterey Street, Suite C200  
 > San Luis Obispo, CA 93401  
 > (805) 543-7095X103  
 > (805) 543-2367 (FAX)  
 > mreents@swca.com  
 > www.swca.com

> -----Original Message-----  
 > From: jkeyes [mailto:jkeymac@ocsnet.net]  
 > Sent: Wednesday, July 21, 2010 11:01 AM  
 > To: lbuckingham@groves.org  
 > Cc: Mary Reents  
 > Subject: Horse Staging Area Concern

>  
 > Mr. Bruce Buckingham  
 > City of Grover beach

>  
 > c/o Mary Reents

CETLC-1

> SWCA Environmental Consultants  
 > 1422 Monterey Street, Suite C200  
 > San Luis Obispo, California 93401

>  
 >  
 >  
 >  
 > Reference: Equestrian Staging Area

>  
 > To Who it May Concern:

>  
 > My name is John Keyes and I am the Chairman for the California  
 > Equestrian Trails and Lands Coalition.  
 > <http://www.calequestriancoalition.com/>

>  
 > CET&LC represents 15 horse organizations, with a combined total  
 > membership of over 35,000 horse owners.  
 > CET&LC is very concerned by the move to change the access for horses  
 > in your area.

>  
 > If you remember in the early 1990's State Parks closed Gro Flaco to  
 > animals, we were assured equestrians would have access to the beach at  
 > the end of Grand Ave in Grover City.

>  
 > For almost twenty years, the equestrian community has enjoyed  
 > approximately one and one half acres of unpaved area, next to the  
 > parking lot for the restaurant; State Parks even put in hitching post  
 > for our future use.

>  
 > When this convention motel project was first proposed on the site  
 > presently used by the equestrians, there was an understanding 25  
 > spaces for horse trailers units would be provided. After studying the  
 > 25 spaces we feel that this space is not an adequate staging area for  
 > the needs of the current equestrian use in this area.

> Fifty parking spaces for trailers, with the room to tie horses on at  
 > least one side of the trailer, would be a preferable alternative.  
 > As noted by equestrians at your scoping meetings, the presently  
 > suggested eleven parking spaces are not adequate for the needs of the  
 > equestrian community.  
 > We hope you will reassess this staging area.

>  
 > Sincerely,  
 > John Keyes  
 > Chairman: California Equestrian Trails and Lands Coalition

CETLC-2

CETLC-3

CETLC-4

CETLC-5

**Response to Email from John Keyes, Chairman, California Equestrian Trails and Lands Coalition, dated January 17, 2011**

Comment No.	Response
CETLC-1	The commenter asks whether he needs to send additional comments concerning the horse staging area. A response email was sent on January 18, 2011 stating that he was welcome to submit additional comments before the deadline for responding, and that all previous comments made in his letter would be addressed in this section. No further response is necessary.
CETLC-2	The comment describes the California Equestrian Trails and Lands Coalition structure and membership and expresses concern over the change of access for horses at the project site. The comment does not contain substantive statements or questions about the EIR, and no further response is necessary.
CETLC-3	The comment states that equestrians were assured they would be provided access to the beach at the end of Grand Avenue in Grover Beach in the early 1990's when State Parks closed Oso Flaco Lake to animals. Please refer to Master Response EQ-13 regarding this issue.
CETLC-4	This comment references an understanding that 25 spaces for equestrians would be provided on the site. Please refer to Master Response EQ-12 related to this issue.
CETLC-5	The commenter states that current equestrian use in the area supports the need for 50 parking spaces for trailers in the project location, with space to tie horses on at least one side of the trailers, and states that the 11 spaces proposed is insufficient. Please refer to Master Responses EQ-1, EQ-2, and EQ-4 related to equestrian parking needs, spots, and beach access issues.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:20 AM  
**To:** Emily Creel  
**Subject:** FW: parking at Pismo Beach

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**From:** Kelly Krambs [mailto:doolittleloc@att.net]  
**Sent:** Mon 1/17/2011 7:46 PM  
**To:** Mary Reents  
**Subject:** parking at Pismo Beach

To Whom It May Concern:

This letter is in regards to the number of parking spaces available to equestrians at Pismo Beach according to the Draft Environmental Impact Report for the Grover Beach Lodge and Conference Center.

KK-1

As an equestrian, I drive from over an hour when I come to ride at the beach and it would pose a great problem to drive that far with horses to find all the spaces occupied. Also, trailers vary significantly in size and sometimes they are pulled by large motor homes. The report did not specify size, etc.. The report is also flawed in its estimation of need due to the time of day/year when the study was performed. Holiday weekends such as Memorial or Labor day, typically most equestrians would avoid the beach due to high recreational vehicle usage.

KK-2

KK-3

I vote for continuing to provide the 25 spaces currently allotted for equestrian usage.

KK-4

Thank you.

Sincerely,  
Kelly Krambs

**Response to Email from Kelly Krambs, dated January 17, 2011**

Comment No.	Response
KK-1	The commenter discusses the problems that would arise if out-of-town visitors/equestrians arrived at the beach and found that no parking was available to accommodate them. Refer to Master Response EQ-2 related to parking for out-of-area users, and also to Master Response EQ-1, EQ-4 related to equestrian usage and beach access issues.
KK-2	This comment raises the issue of accommodating trailers and motor homes of various sizes. Please refer to Master Response EQ-3 related to the design and safety of the equestrian parking area.
KK-3	The comment states that the survey is flawed because of its inclusion of afternoons only and Labor Day weekend in the counts, when most equestrians would avoid the beach. Note that the survey period did not include Memorial Day or any other holiday weekend in its counts. Please refer to Master Response EQ-2 regarding the adequacy of the equestrian parking survey.
KK-4	The commenter recommends continuing to provide the 25 spaces currently allotted for equestrian use. Please refer to Master Responses EQ-1 related to the potential loss of equestrian parking and EQ-12 regarding an understanding that 25 spaces would be provided.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Tuesday, January 18, 2011 8:20 AM  
**To:** Emily Creel  
**Subject:** FW: Parking for Horse Trailers

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**From:** Claudia Engel [mailto:claudia@thunderheadranch.com]  
**Sent:** Mon 1/17/2011 1:00 PM  
**To:** Mary Reents  
**Cc:** ELLEN COROB  
**Subject:** PARKING for Horse Trailers

To the Planners of the Grover Beach Lodge and Conference Center,

The Central Coast has a proud history of being Horse country. The limited places left to ride along the beach has been a special feature of the Central Coast. The need to haul horses to the coast requires the ability to park and prepare for the ride. Many people share that journey with larger trailers and one truck. Being a past professional horsewoman at the Los Angeles Equestrian Center, Playing Polo around the country exercising our Polo Horses along the Santa Barbara Coast line, and also being a ranch owner in Creston, I urge you to take notice of the Equestrians in this area and those who travel here to enjoy the coast and how special that opportunity is.

We need parking spaces to enjoy this adventure and exercise. The coast has provided many set-ups for campers to park their vehicles for days. We wish in most cases to park for a day or half of a day in that our horses are on a schedule and traffic is of concern to keep the schedule. In this planning stage of celebrating the nature and clean beauty of the California Coast I urge that you recognize your horseman in this area and make space for parking at the Grover Beach Lodge and Conference Center so that all can continue to enjoy our special clean and open coast.

Thank you  
Claudia Salot-Engel  
Thunderhead Ranch

CSE-1

CSE-2

CSE-3

CSE-4

**Response to Email from Claudia Salot-Engel, dated January 17, 2011**

Comment No.	Response
CSE-1	The comment discusses the equestrian history of the area and points out that the ability to ride horses on Pismo Beach is a special feature of the Central Coast. The comment does not contain any substantive statements or questions about the EIR, and no further response is needed.
CSE-2	The commenter describes the need for a place to park and prepare for the ride for a variety of large trailer/truck combinations. Please refer to Master Response EQ-3 related to the design of the equestrian parking area.
CSE-3	The commenter describes her longstanding and involvement in professional and personal equestrian history and urges the City to take notice of the equestrians in the area who enjoy the special opportunity to ride at Pismo Beach. The City recognizes the importance of the opportunity to ride at Pismo Beach to the local and extended equestrian community. However, they must rely on available information in gauging the needs of this community. Please refer to Master Response EQ-2 related to the adequacy of the equestrian parking survey.
CSE-4	This comment states that equestrians need parking for half of a day in most cases to keep their horses on schedule, and urges the City to provide parking at the lodge site so that all can continue to enjoy the beach. Please refer to Master Response EQ-1 regarding the potential loss of parking spaces and EQ-4 related to equestrian beach access issues.

Emily Creel

From: Mary Reents  
Sent: Wednesday, January 19, 2011 10:22 AM  
To: Emily Creel  
Subject: FW: Grover Beach Parking for Equestrians

From: robert.dodds [mailto:rcdodds@sbcglobal.net]  
Sent: Wed 1/19/2011 2:45 AM  
To: Mary Reents  
Subject: Grover Beach Parking for Equestrians

To whom it may concern:

In the early 70's I chose to go to Cal Poly because it offered a safe campus, not one that was run by liberal student bodies who wanted to burn banks and make it a point to protest against the Vietnam War. I also liked the surrounding atmosphere of an equine environment along with bovines and other farm animals. I decided to spend my life here to continue this lifestyle. I did not move here to change it for an existence that one would find elsewhere, like Los Angeles, San Francisco or San Diego. In my mind this was Nirvana.

CD-1

Horses and other animals have always played a large role in my life and I work very hard with many welfare groups locally and national to insure that animal cruelty is corrected whenever found. One of the greatest joys I see in San Luis County is people riding on the beach, not only from our county but from the San Joaquin Valley, and other areas as far away as Northern California. Often times when it is the best riding time for us, we choose not to ride those days as it is a Holiday and crowded with the QVR's from out of town. We make this sacrifice because we know that they bring in a cash flow that helps the local economy. Montana de Oro, Grover Beach, Above Moro Rock, is what we have left to ride. What a shame that the access we did have was stricken from us at Oso Flaco Beach. In my opinion it would be wise for the state to revisit Oso Flaco Beach and rethink allowing horses & trailers even if there is a charge. We often ride on private ranches and pay fees, as our riding areas have diminished to less than half of what we used to have.

CD-2

We need at least an acre of land to park the trailers and have our horses tied to our vehicles. There are handicapped people who use the beach and they have bigger rigs and need more space. It would be unfair to take away those parking spaces for regular trailers to put in the ones for the handicapped ones. So in this planning faze we really hope you will work with the advisory horse group we have put together representing the county for all the various equestrian groups. We want to make it easier on you to have one voice, than to have you listen to 100's.

CD-3

CD-4

CD-5

CD-6

Horses have gone from the working beast to companion animals. Those of us lucky enough to own them bring in millions of dollars county wide. We spend more on vet bills, feed stores, clothing stores, farriers, vehicles, and many more items that bring in revenues to this county. Please consider that we are a large part of what makes this county so special, and we are a group that spends money when others don't. We keep it local.

CD-7

Sincerely, Cherie Dodds  
Ride Nipomo Board Member  
Rocky Mountain Horse Club Member  
Monterey Bay Equestrian Member  
Back Country Horseman Member  
Tax Paying and Law Abiding Citizen

**Response to Email from Cherie Dodds, dated January 19, 2011**

Comment No.	Response
CD-1	The commenter discusses her history with horses, and decision to relocate to Cal Poly and the Central Coast. The comment does not contain substantive comments or questions about the EIR and no further response is necessary.
CD-2	This comment states that many equestrians choose not to ride on days that would be most convenient for them to avoid crowds and holiday travelers from out of town and because they recognize the economic benefit provided by those crowds. Please refer to Master Response EQ-2 related to the adequacy of the equestrian parking survey and EQ-11 related to the economic benefits of equestrian uses.
CD-3	The comment discusses the limited places left for equestrians to ride, and requests that the state consider re-opening Oso Flaco Beach to horses even if there is a fee. The request is outside of the scope of the proposed project and this document. This comment does not contain substantive comments about the EIR, and no further response is needed. For more information related to equestrian beach access, please refer to Master Response EQ-4.
CD-4	The commenter states that equestrians need at least an acre of land to park their trailers and have horses tied to their vehicles. Please refer to Master Response EQ-1 related to potential loss of equestrian parking spaces and EQ-2 regarding the survey of equestrian use at the project location.
CD-5	This comment states that it would be unfair to take away parking for regular trailers to put in spaces for handicapped spaces that require more room. The proposed project has not differentiated between regular and handicap equestrian spaces. The requirements for handicap access are set out in the ADA. The City of Grover Beach considers handicap beach access as an integral component of the beach area and handicap spots are proposed in the Fin's Restaurant parking area. The project applicant has contemplated leaving the equestrian parking area un-striped, much the same as the existing parking area, so that no spaces would be specifically designed for regular or handicap users.
CD-6	This comment references an advisory horse group put together for all the various equestrian groups in the county to coordinate their opinions in regards to this project. The City appreciates the coordinated effort put forth by the equestrian community in reviewing this project.
CD-7	This comment points out the economic benefit of equestrian uses in the county. Please refer to Master Response EQ-11.

19 January 2011

John Laferriere  
 1123 Loreto Court  
 Grover Beach, CA 93433  
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Mr. Bruce Buckingham  
 City of Grover Beach  
 c/o Mary B. Reents  
 SWCA Environmental Consultants  
 1422 Monterey St. Suite C200  
 San Luis Obispo, CA 93401

Re: Public Comments on the Grover Beach Lodge and Conference Center EIR

I have taken the opportunity to review the draft of the Grover Beach Lodge and Conference Center EIR. I have also taken the approach that "draft" means all areas and all comments are welcome for your consideration in the final version of this EIR. Comments are primarily related to the environmental impact issues. However, some project-specific comments are interspersed. My intent was to properly identify each issue and give a reasonable description of the concern. I do recognize that it may not be possible to address some of these comments.

Page 2-12, Section 2.5.2.1, first paragraph:

"Upon reissuance of the concession contract in 2014, ...". Earlier, on page 1-3, Section 1.4.1, it says that the current 10-year concession contract is through August 31, 2012. Won't another 10-year contract be issued in mid-2012? Is the 2014 date a mistake, or is there expected to be a delay before the concessionaire can "revise the building architecture to be compatible with the lodge buildings". A timeline of these events might be helpful.

JL-1

Page 2-13, Figure 2-5:

Vehicle access off of Grand Avenue to parking areas is unclear. There appears to be a dead-end lot at the entrance near the eastern-most monument sign. The legend indicates that this is both for the public (#9) and hotel parking (#12). The lot just west of that doesn't have an obvious entrance/exit for this hotel only parking. Is it perhaps the "grass pavers rated for emergency vehicles" next to the public boardwalk to the north? The same comment applies to the next lot to the east that appears to be a dead-end as well for both public and hotel parking. Is there a break in the landscaping missing somewhere? Is the intent for parking in the south eastern lots supposed to be difficult to reach from Le Sage Drive? Some directional arrows might help this figure (i.e. similar to RV dump station in Figure 2-8).

JL-2

Laferriere GB Lodge EIR Comments  
 Page 1

Appendix M (Page 15) appears to offer related commentary to what I have offered. It shouldn't be left hidden in several hundred pages of Appendices.

JL-3

*"Cross-Lot Access The proposed parking layout currently lacks adequate cross access for vehicles to circulate within the project site. Some of the parking lots appear to be isolated facilities that are only accessed by a single driveway. Unless drivers want to navigate the circuitous hotel parking and drop-off areas, vehicles will be forced to re-enter Grand Avenue in order to access adjacent parking facilities. This may create additional traffic on Highway 1 and at the Le Sage and Grand Avenue project access driveways.*

Also, some clarification should be made in terms of the number of parking spaces for public and hotel. There appears to be three flavors of parking: 1) public only near Fin's and golf course; 2) public and hotel along the eastern boundary in 3 separate areas; and 3) hotel only between the mixed parking and the lodge. This will likely require additional signs, create confusion, and doesn't seem enforceable for either public or private party. Might a better approach be to designate two flavors of just hotel only and the rest public?

JL-4

Page 2-16, Section 2.5.2.3, second paragraph:

"The existing parking area would become Building 3...". Figure 2.6 on the proceeding page makes this statement likely to be Building 2.

JL-5

Page 2-18, Section 2.5.4, first paragraph:

"The two existing inbound lanes will allow for campground check-ins and bypass land...". This likely should change to "bypass lane".

JL-6

Page 2-19, Figure 2-7:

The design call-outs should be enlarged. They are very difficult to see on electronic version of the document as well. There's plenty of space in the rendering for larger text.

JL-7

Page 2-24, Section 2.5.7.1, second paragraph:

"1,600 cy of soil amendments will be imported". This likely should change to "1,600".

JL-8

Page 2-26, Section 2.5.8.4, both paragraphs:

Should telephone service be mentioned in this section with other utilities? Figure 2-11 on page 2-33 lists "Telephone: SBC" (now AT&T) as a utility district.

JL-9

Page 4-12, Section 4.1.4, 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs:

These paragraphs leave the reader to believe that "reference flags" should be visible for "confirming structure height and massing". For Figures 4.1-13 through 16 one might expect

JL-10

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 Page 2

to see these reference flags in the top photo of each comparison. They should be most visible in Figure 4.1-15 view from the Boardwalk looking south where relatively small palm tree fronds and tree trunks are discernable. These flags were described to be “used to ensure the accuracy of the photo simulations”. These photos will likely be a key component of project discussions and showing the photographed reference flags in the top grid would add credibility to the photo simulations.

**JL-10  
(cont'd)**

Page 4-47, Section 4.2.5-1, second paragraph:

“Build out of the project would generate 1,727 average daily trips (Saturday).” This area may require reconsideration after comments made regarding the 1,727 daily trips in the traffic analysis, discussed later during the Transportation/Traffic topic.

**JL-13**

Page 4-15, Section 4.1.5.1, second paragraph:

Here and other areas of the document we see that Buildings 2 and 3 are three feet shorter than Building 1. Earlier in Section 3-4.1.1, in regards to the Land Use Element on Page 3-6 it states: “The project should consist of more than one building with staggered heights and bulk to break up the building mass and allow for view corridors from the site”. The project clearly conforms to 3 of the 4 objectives. It is (1) multiple buildings; (2) breaks up the building mass; and (3) and allows for view corridors. However, a building of 37 feet versus 40 feet hardly qualifies as “staggered heights”. A more substantial reduction in height would likely be more in-line with the spirit of the LUE language.

**JL-11**

Page 4-106, Section 4.6.1.2, sixth paragraph:

<http://nei10.org>. Website is defunct. Eliminate reference. However, the article can be read in a Google search by typing in the search box – [ site:sanluisobispo.com sea level "3.3 to 4.6 feet"] in order to see the July 3, 2010 article if you prefer.

**JL-14**

Page 4-128, Table 4.7-2:

Spacing for the labels “55 60 65 70 75 80” is incorrectly aligned. The darkest shade in Residential is likely at 60 dB, the grey shade likely extends to 70 dB, and the four other categories likely peak at 75 dB. If so, 55 and 80 could also be eliminated.

**JL-15**

Page 4-44, Table 4.2-5:

The table of screening emission rates for construction operations appears to be of good potential benefit, but the document does not appear to use the information. It states that this table “should only be used when no other project information is available” but presents it for our consideration just above the levels for construction activity requiring mitigation (Table 4.2-6). To assess the 7 pounds daily Diesel Particulate Matter (DPM), Table 4.2-5 would allow 1429 (=7 / 0.0049) cubic yards to be moved daily. The 11,470 cubic yards of cut & fill added to the 1,600 cubic yards of import soil requires activity of just over 9 days at that emissions level limit. Similarly, to assess the 137 pounds daily for the combined the Reactive Organic Gases (ROG) plus Oxides of Nitrogen (NOx), Table 4.2-5 would allow 1,204 (= 137 / (.0203 + .0907)) 1,204 cubic yards to be moved daily. For the soils amounts listed, that would equate to 10.9 days. If this were true and accurate, maintaining emissions within the stated pounds per day limit is either simple vehicle operation scheduling or not a problem given that all work might not occur in less than the 11 days.

**JL-12**

Page 4-130, Table 4.7-3:

The number of autos, particularly at monitoring station #2 and #4 defies belief based on personal experience. Per 15 minute measurement interval, there is more than 1 vehicle per second continuously. Can you imagine how long the backup would be with the near 90 second light cycle at Grand and Highway 1? If this is true, it completely invalidates the traffic analysis in the following section which experiences significantly less peak hour vehicle counts during a continuous 3-day period monitoring period. Perhaps the auto measurement was a per/hour rate that should be divided by 4 in the 15 minute table. (See related comments for the Transportation/Traffic topic discussed on the next page).

**JL-16**

While I remain skeptical that a one-sized formula can account for a variety of construction projects irrespective of site size and distance of soil movements, the guideline seems in stark contrast to the analysis method chosen. Table 4.2-8 which uses the URBEMIS simulation results shows dramatically greater emissions for periods spanning portions of 2 years. Either the SLOAPCD construction operations screening emission rates bear no resemblance to physical emissions, or the URBEMIS analysis is significantly overestimating the potential emissions during construction of this project.

The conflict of the guideline that was offered in Table 4.2-5 and the summary based on results in Table 4.2-8 should be revisited and resolved.

Page 4-135, Table 4.7-6:

The table summarizes maximum noise levels at 50 feet. The question is who is at 50 feet during these “short-term construction related” periods described in Section 4.7.5.4? Above this table we are told that “noise experience by construction equipment would be reduced over distance at a rate of 6 dB per doubling of distance”. The closest residences to the project boundary are not permanent, but are part of the RV park. Also, they are closer to 200 feet from the project boundary given the width of Meadow creek and stated mitigation efforts around a 50 foot buffer on the western side. So, these few “unlucky campers” at the closest site to construction should receive close to a 12 dB reduction due to distance doubling twice from 50 to 200 feet. If these were permanent residences, it might be appropriately treated with the most conservative analysis. However, that camping location may be vacant and the analysis shouldn’t use that as the bounding condition. The table should be altered or include an additional column representing the distance that residents, both temporary and permanent, would be impacted. Most of the permanent residences are much further away so this EIR should more clearly communicate the expected noise nuisance levels.

**JL-17**

Page 4-140, Section 4.8.1.1:

In the “Existing Train Services”, the Pacific Surfliner is the only train that stops in Grover Beach. The Coast Starlight doesn’t stop in Grover Beach, but does stop in San Luis Obispo. Revise the paragraph accordingly to clarify.

JL-18

quiet that they expected from the lodge, so they drove out again to a movie. Staff at the hotel is part-time and each drives themselves there for irregular shifts, sometimes more than once per day. This is the type of story that is needed to support these additional 1,757 car trips per day. This figure is 50% more than the peak Saturday hour at Le Sage Drive and Highway; and, all of them are an additional result of the lodge’s presence. Isn’t at least one of the rooms filled by the couple that shows up on a Friday and enjoys the many resort-like amenities and doesn’t choose to get in the car until Sunday after check-out (i.e. 2 trips / 3 days = )0.67 plus there share of he staff’s trips? Is the 1.51 trip/room really a credible average?

JL-21  
(cont’d)

Page 4.143, Figure 4.8-2:

Earlier, I made a comment regarding the number of vehicles tabulated during the Noise survey. The peak hour volume at Le Sage Drive is shown to be 392 Southbound Highway 1, 105 + 226 West Le Sage, 55 + 140 East Le Sage and 345 Northbound Highway 1 for a total of 1263. Note this is the Saturday peak hour. However, the Noise survey chose a random 15 minute period and found 928 vehicles for a 15 minute period equivalent to 3,712 per hour. Something clearly does not agree. A similar large discrepancy can be found by comparing traffic volumes at the other three noise monitoring stations.

JL-19

This initial assumption of car trips clearly results in impacts in the traffic analysis. It begs the question, how many trips would be a result of the project if it were constrained to 135 rooms? 120 rooms? I have reviewed the 90 plus page traffic analysis (Appendix G-1) that results from this key assumption. It may be solid analysis, but the initial assumption of the per room trip traffic may need to be derived from other methods. How about a sample count of all of the “Ins” and “Outs” from the parking lot of a nearby 100+ room Pismo Beach hotel for comparison? Is there other real data from other projects to use for comparison?

Page 4-144, Section 4.8.3.1:

A comparison review of the Initial Study and this EIR in sections 4.1 through 4.8 for CEQA Guidelines and related potential areas for significant and less than significant impacts shows good consistency with the exception of section 4.8. Two items: (1) “Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)” and (2) “Result in inadequate emergency access” were classified as “No Impact” in the Initial Study. This may be a simple mistake. Perhaps they should be eliminated in the EIR, particularly if no descriptive case is made to contradict the Initial Study’s findings.

JL-20

Page 4-157, Section 4.9, first paragraph:

The first sentence containing “...agricultural resources, cultural resources, land use, hazards, paleontological resources, land use, population and housing, public services, utilities and service systems and recreation” needs attention. That sentence incorrectly summarized the Initial Study (Appendix A-1) which found insignificant impacts to “agricultural and forest resources, mineral resources, population/housing, public services, recreation, and utilities/service systems. It appears both “hazards” and both occurrences of “land use” should be removed.

JL-22

Page 4-146, Section 4.8.4.1, second paragraph:

The entire analysis is predicated on the assumption that “the project is estimated to generate 1,727 new daily vehicular trips”. While it may be true that the ITE Trip Generation Manual (8<sup>th</sup> edition) lists this per room rate for a “resort hotel”, something as critical as this needs some additional explanation. As an example, earlier on page 4-47 when this figure is first introduced in the document, there is an accompanying description of weekly deliveries of “two beer vendors, two or three liquor/wine vendors, one large food and beverage delivery, two or three smaller specialty food deliveries (seafood/produce/bakery), and one linen delivery.” It is this type of common sense description that is needed to help justify the 1,757 (11.7 trips per each 150 rooms) of this project.

JL-21

The Initial Study listed eight items of significant impact leading to sections 4.1 – 4.8 in the EIR. I was expecting Section 4.9 to capture the remaining three “less than significant” areas of (1) cultural resources; (2) hazards/hazardous materials; and (3) land use planning identified in the Initial Study. Although the first sentence does have the clause “and further environmental review” the organization of section 4.9 is surprising and may be in error.

Instead, it starts with section 4.9.1 “Agricultural Resources” which two paragraphs earlier was an insignificant category. Sections 4.9.2-4.9.4 contains the three areas with “less than significant findings.” These three sections appear to be well done. However, section 4.9.5 through 4.9.9 addresses other areas that were deemed insignificant in the “less than significant” section 4.9. I chose not to make a number of comments regarding sections 4.9.1 and 4.9.5-4.9.9, because I’m hoping this entire section is redone to eliminate the inconsistencies and address only items that are “less than significant” in the “less than significant” section 4.9 of the document.

Consider how hard this would be to describe to support this trip level. Dick and Jane arrive from Bakersfield. After checking in, they found they forgot items and went to Rite Aid. Local friends Bob and Sue drove to meet them at the lodge for dinner. They tried to get into the lodge restaurant for dinner, but local residents had the place filled to capacity. Unfortunately, they all had to pile into Bob’s car and drive to a lesser-crowded Grover Beach establishment. Meanwhile tables at the lodge’s restaurant continued to turn a couple times during dinner hours and waits were long. After returning, the group didn’t find the peace and

Page 5-3 Section 5.3.1:

This section properly dismisses lower-level lodging of camping and motels. However, a reduction or reallocation in scale could be reviewed as well. In section 1.3 we are reminded

JL-23

that “the JA indicated that it requires a project to be comparable in uniqueness of style and design and in quality of construction to lodge facilities located within the Asilomar Conference Grounds...”. Asilomar has 300 rooms and 30,000 square feet of conference area including 28 separate meeting rooms (video at [www.visitasilomar.com](http://www.visitasilomar.com)). Perhaps a version of this lodge and conference center project with fewer hotel rooms and more conference center area should have been evaluated given that the ratio is well below that at Asilomar. It is likely that the 150 rooms could not have an associated 15,000 of indoor conference area. Perhaps 135 rooms could have 13,500 square feet? I do not place much emphasis on the proposed project’s potential for additional outdoor conference space. Conferences with audio/video presentations and papers don’t work well with wind and sun. To be clear, this is an idea not captured in the evaluation of alternatives A3 and A4 in Table 5.1.

JL-23  
(cont’d)

Page 7-1, Section 7.1:

In the last sentence, “change sin” should become “changes in”.

JL-24

Page 8-6, Section 8.2:

“...in association with the County of San Luis Obispo” may be a leftover from another EIR and should be replaced (or at least supplemented) with City of Grover Beach.

JL-25

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Several of my comments may also pertain to some of the corresponding areas of the Executive Summary, if changes result in the other sections. I have no additional comments related to the Executive Summary section itself.

JL-26

Thank you for the opportunity to review this draft EIR.

Respectfully,

John Laferriere

cc Bruce Buckingham, via email, sent 1/19/2011

**Response to Letter from John Laferriere, dated January 19, 2011**

Comment No.	Response
JL-1	<p>Thank you for the time and consideration spent reviewing the EIR and for your thoughtful comments.</p> <p>This comment points out a discrepancy regarding the expiration date of the Fin's Restaurant concession contract. The concession contract expires in August 2012. Incidentally, State Parks has preliminarily indicated that renewal of the concession contract may not be considered until after the proposed project has completed construction. Therefore, the reference to the contract in Section 2.5.2.1, Fin's Restaurant and Outdoor Concessions, of Chapter 2, Project Description, has been deleted and that section amended as follows:</p> <p>"The restaurant building may be enlarged approximately 700 square feet to include a beach equipment rental concession area. As a result, the outdoor patio area would be reconfigured to retain the existing seating. The improvements to the restaurant may occur as part of the new concession contract awarded by State Parks after completion of the lodge project. Upon reissuance of the concession contract, the State will require the new restaurant concessionaire to revise the building architecture to be compatible with the lodge buildings. The State envisions this area to support visitors to the public non-vehicular beachfront area as well as lodge guests."</p>
JL-2	<p>This comment discusses dead-end lots and the lack of entrances for various lots shown on project site plans. The commenter is correct that various deficiencies exist in the parking lot design and configuration. TC Impact 2 (TC Impact 3 in the Draft EIR) identified these deficiencies and TC/mm-2 (TC/mm-3 in the Draft EIR) provides that "Prior to issuance of a grading permit for Area A, the circulation parking patterns shall be reviewed and approved by the City to improve ingress and egress between the individual parking areas in Area A, and allow turn-around space in each parking area to avoid vehicles from having to back up to turn around or exit the lots." This mitigation measure has also been amended in response to Comment No. CCC-13 to maximize parking.</p>
JL-3	<p>The comment refers to language related to parking lot configuration in Appendix M of the EIR, and states that this language is hidden in the several hundred pages of Appendices. The commenter correctly points out that information exists indicating the proposed parking lot configuration includes inadequate access and circulation within the proposed parking layout. This language is also discussed in the body of the EIR, however, in Section 4.8.4.1, Transportation/Traffic – Project Trip Generation-Project Conditions, along with other concerns related to parking layout and maneuverability and a recommendation that the parking lot design be re-evaluated.</p>
JL-4	<p>This comment discusses the distinguishing lots for public and lodge parking. Please refer to Table 2-1, in Section 2.5.1, Lodge and Conference Center (Area A), of Chapter 2, Project Description, for the Total project Parking Summary, and discussion in Sections 2.5.1.4, Lodge Parking, and 2.5.2.2, State Park Parking. The comment recommends separation of public and lodge parking (as opposed to public, lodge, and a mix of public and lodge parking currently proposed). The commenter is correct that enforceability between public and private parking will be difficult. TC/mm-3 (TC/mm-4 in the Draft EIR) recommends that the City post parking areas for specific uses using time limits, permits, meters, or other measures acceptable to the City and concessionaires.</p> <p>Note also that a mixed parking lot for public and lodge parking could serve as overflow parking should either use need additional space, whereas completely separate parking areas would limit users to the existing designated spaces with no flexibility. As the parking lot configuration will be redesigned for City approval prior to project permitting, this comment has been forwarded to the City for their consideration in that re-design process.</p>

Comment No.	Response
JL-5	<p>The comment points out a mistake in the reference to the building in Section 2.5.2.3, Golf Course Facilities, in Chapter 2, Project Description. The EIR has been corrected to state:</p> <p>“The existing parking area would become Building 2 of the lodge facility...”</p>
JL-6	<p>The comment points out a mistake in Section 2.5.4, RV Sewer Dump Station (Area D), of Chapter 2, Project Description. The EIR has been corrected to state:</p> <p>“The two existing inbound lanes will allow for campground check-ins and a bypass lane for RV’s to enter the sewer dump station.”</p>
JL-7	<p>The comment points out the difficulty reading call-outs in Figure 2-7 of Chapter 2, Project Description. This figure was submitted by the project applicant and then reduced in scale to allow inclusion in the EIR. Full size plans are available for review at the City offices.</p>
JL-8	<p>This comment points out a mistake in section 2.5.7.1, Natural Areas, of Chapter 2, Project Description. The EIR has been corrected to state:</p> <p>“1,600 cy of soil amendments will be imported.”</p>
JL-9	<p>The comment questions whether or not telephone service should be included in the discussion regarding Electricity, Natural Gas, and Cable in Section 2.5.8.4 of Chapter 2, Project Description. This section has been edited to read:</p> <p>“2.5.8.4 Electricity, Natural Gas, Telephone Service, and Cable</p> <p>Other private utilities would provide gas, electricity, telephone service, and cable. Natural gas would be provided by Southern California Gas Company, electricity would be provided by Pacific Gas and Electric Company (PG&amp;E), cable would be provided by Charter Communications, and telephone service could be provided by various available service providers.”</p>
JL-10	<p>The comments discusses the use of reference flags to establish visual models for the proposed project, and recommends that the flags be shown in the top of the photo comparisons of the project site from various viewing points. The reference flags are used to determine the height of various building components, and determine the scale of the proposed structures so that an accurate computer-generated model of the structures can be developed and inserted onto existing photos of the site to show what the proposed project would look like after constructed. The location of the flags corresponds with the critical points and corners of the buildings, but are not shown in the photos once the modeled buildings (configured based on the reference flags) have been inserted. The top photo of each photo simulation represents the existing view of the project site from each viewing point. Therefore, inclusion of the reference flags is not appropriate, as they do not make up part of the existing view.</p>
JL-11	<p>The comment discusses the Land Use Element’s “staggered height” requirement for project buildings to break up building mass and allow view corridors. Buildings 2 and 3 are <del>three-six</del> feet shorter than Building 1. While the LUE may have envisioned greater staggering of building heights, this design does technically comply with the LUE. In addition, each building incorporates staggered heights in its individual design, including two- and three-story elements and varying roof lines. <u>Proposed project revisions would further stagger building heights by separating</u></p>

Comment No.	Response
	<p><u>the conference center to a fourth, standalone, one-story building.</u> As no significant unavoidable impacts to aesthetic or visual resources were identified in the EIR, this impact is not considered significant.</p>
<p>JL-12</p>	<p>The comment discusses inconsistencies between the construction emission rates information located in Table 4.2-5 and Table 4.2-6. Table 4.2-5 provides non-project-specific information on general construction emissions based only on the volume of soil removed and the area disturbed. This information is provided by the APCD, but is not used to quantify emissions of the proposed project. It is included in the EIR for general informational purposes only. If project-specific data were not available, this Table would provide a basis for estimating emissions, though potentially less accurate.</p> <p>Projected project construction emissions were calculated through URBEMIS modeling and listed in Table 4.2-6. This information takes into consideration all project components, activities, and equipment, and considers the entire life of the project rather than just looking at the volume of soil removed and the area disturbed. This method is more inclusive and more accurate and the APCD prefers this method be used when analyzing air quality impacts of projects.</p>
<p>JL-13</p>	<p>This comment refers to Transportation/Traffic comments made later in the letter. No further response is necessary.</p>
<p>JL-14</p>	<p>The commenter points out that a website referenced in Section 4.6.1.2, Hydrology and Water Quality – Flooding and Drainage, does not provide the relevant information referenced in the EIR. The article <i>Climate Change is Hot Topic In County</i> can be found at:  <a href="http://www.sanluisobispo.com/2010/07/03/1203748/climate-change-is-a-hot-issue.html#">http://www.sanluisobispo.com/2010/07/03/1203748/climate-change-is-a-hot-issue.html#</a>                      or by entering the following information in the Google search box:                      site:sanluisobispo.com sea level “3.3 to 4.6 feet”                      Refer also to the response to comment CCC-7, above.</p>
<p>JL-15</p>	<p>The comment points out a spacing error in the labeling of Table 4.7-2 in Section 4.7, Noise. The spacing has been corrected to match the table in the City of Grover Beach General Plan (1993).</p>
<p>JL-16</p>	<p>The commenter discusses inconsistencies found between the traffic counts used in Section 4.7, Noise, and Section 4.8, Transportation/Traffic. The EIR preparers have double-checked their counts and confirmed that the numbers are correct. The Noise counts, which the commenter believed to be very high, were taken from actual field counts by the noise specialist. The Noise counts were taken at peak times, on a Friday night, and very heavy traffic was present. While traffic conditions of more than one vehicle per second may sound incredible, this count includes cross-directional traffic from all directions, turn lanes, etc. Traffic counts used in a noise analysis are rarely the same as those used to determine roadway and intersection level of service (LOS). The noise counts were taken during the peak period of the peak day during the peak month of the year. The EIR does not aim to design improvements for this specific condition.</p>

Comment No.	Response
JL-17	The comment questions why maximum noise levels are analyzed at a distance of 50 feet. This distance is merely a reference distance used for all construction activities to quantify the amount of noise and allow comparative analysis between different equipment, areas, topographical conditions, etc. All published materials use the 50 foot reference distance in analyzing noise impacts.
JL-18	This comment identifies the Pacific Surfliner as the only train that stops in Grover Beach. The EIR has been amended to include this information.
JL-19	<p>This comment refers to the discrepancy in Noise traffic counts and Transportation/Traffic modeling. The traffic counts collected by OMNI-MEANS are consistent through the Highway 1 corridor and are largely consistent with counts taken in the past, including the Caltrans-published AADT traffic data. OMNI-MEANS's counts were taken during the summer months, which is the peak vacation time. Therefore the counts in the traffic study represent a reasonably conservative estimate of vehicular conditions during typical weekdays and weekend periods. However, it appears that the Noise data was collected on a Friday evening during the summer, which is the peak period of the peak day during the peak month of the year. The traffic study does not aim to design improvements for this specific condition.</p> <p>Please also refer to Response to JL-16, above.</p>
JL-20	The comment addresses the threshold criteria identified in the Transportation/Traffic analysis. These are significance criteria that are included in the CEQA initial study checklist. It is appropriate to include these items here, even if the project itself causes no impact to them, as they are part of the CEQA significance criteria.
JL-21	<p>This comment questions the estimated new daily vehicular trips associated with the proposed project. The project's daily trip generation estimates from the ITE trip generation manual are average trip rated from "Resort Hotel" land uses across the country. These sites have generally similar facilities. The ITE trip generation manual describes the sites as such:</p> <p>"Resort hotels are similar to hotels in that they provide sleeping accommodations, restaurants, cocktail lounges, retail shops and guest services. The primary difference is that resort hotels cater to the tourist and vacation industry, often providing a wide variety of recreational facilities/programs (golf courses, tennis courts, beach access, or other amenities) rather than convention and meeting business. Resort hotels are normally located in suburban or outlying locations on larger sites than conventional hotels."</p> <p>Of all ITE land use categories, this is the most consistent with the proposed project. However, because the project also includes a conference center, the "Hotel" land use is also applicable. The "Hotel" land use has a higher AM and PM weekday peak hour trip generation. To provide a conservative, reasonable worst-case scenario analysis, the greater "Hotel" AM and PM weekday trip generation rates were used. For Saturday mid-day peak and daily trip generation, the higher "Resort Hotel" trip generation was used, because it accounts for the increased recreational use typical of a recreational resort destination.</p> <p>The trip generation estimates are conservative in that they provide an analysis of the hotel's trip generation characteristics under high occupancy and full use. Despite the high trip generation rate, the traffic impacts are minimal, and it is not recommended that the study use any other trip rates.</p> <p>Other nearby hotels could be surveyed to provide comparisons of trip generation characteristics per room, but it is unclear whether the results of these surveys would provide any more reliable data than the ITE trip generation manual. Given that unique attributes of nearby communities,</p>

Comment No.	Response
	such as walkability and beach destinations for example, the validity of the comparison between the other hotel sites and the proposed project could be brought into question.
JL-22	The comment appears to make a distinction between “less than significant” and “insignificant” impacts. These terms are used interchangeably throughout Section 4.9, Issue Areas with Less than Significant Impacts, to discuss all CEQA issue areas that were determined <i>not</i> to have significant impacts. The finding of <i>no significant impact</i> for these issue areas was based on the Initial Study as well as additional environmental review of the project. Each of the issue areas discussed in Section 4.9 were determined <i>not</i> to result in significant impacts that would justify a more in-depth discussion (agricultural resources, cultural resources, hazards, land use, paleontological resources, population and housing, public services, utilities and service systems, and recreation).
JL-23	This comment suggests that the EIR should have looked at a reduced scale alternative to the proposed project. Please refer to the response to Comment No. CCC-10, above, related to the exclusion of a reduced scale alternative.
JL-24	This comment corrects a typo. This change has been reflected in the EIR.
JL-25	This comment corrects an improper reference to the County of San Luis Obispo. The EIR has been edited to refer to the City of Grover Beach.
JL-26	This comment concludes the letter and no further response is necessary.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Thursday, January 20, 2011 2:59 PM  
**To:** Emily Creel  
**Subject:** FW: GROVER BEACH LODGE AND CONFERENCE CENTER

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**From:** PDSCOCO@aol.com [mailto:PDSCOCO@aol.com]  
**Sent:** Thu 1/20/2011 2:06 PM  
**To:** Mary Reents  
**Subject:** GROVER BEACH LODGE AND CONFERENCE CENTER

Hello,

I am very concerned about this conference center. I use the beach to walk, walk my dog and bike. I believe this center is way too large for the area. The cutting down on public parking is bad for all the tax payers in the area. It looks like the city is so anxious to get the monies from this center that they have forgotten the people that live here and pay taxes.

Please consider more public parking.

Thanks you for considering this.

P. D. Smith

PDS-1  
PDS-2

**Response to Email from P.D. Smith, dated January 20, 2011**

Comment No.	Response
PDS-1	This comment states that the proposed conference center is way too large for the area. Please refer to the response to Comment No. CCC-10, above, related to the decision not to carry forward a reduced scale alternative. <u>Also refer to Chapter 1, Introduction, for a discussion related to the decision to relocate and increase the size of the conference center subsequent to preparation of the Final EIR and July 21, 2012 Planning Commission hearing.</u>
PDS-2	The commenter states that the reduction in public parking is bad for all tax payers in the area. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. Therefore, the EIR found this to be an insignificant impact. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above to include maximization of parking.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 21, 2011 11:58 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach

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**From:** LeKlein@aol.com [mailto:LeKlein@aol.com]  
**Sent:** Fri 1/21/2011 10:04 AM  
**To:** Mary Reents  
**Subject:** Grover Beach

To Whom It May Concern,

I moved to Nipomo two years ago to make a lifetime dream come true. I wanted to leave the confusion of the populated area of Southern California and return to the sanity of open spaces. Nothing makes the Central Coast more unique than being able to ride a horse along the beach. I don't know how many videos I am in but I know it is numerous with all of the visitors that have taken a picture or video of my horse and I as we go down the shoreline. They stop, smile, ask to pat my horse, and ALWAYS comment on the beauty of seeing horses by the ocean.

LA-1

I go to the beach in the morning and afternoons at least once every week during the week days. There are always between 5 to 15 trailers parked there (your survey did not include the mornings). I ride other areas on week-ends since the beach is generally too crowded with out-of-town visitors.

LA-2

I can assure you that taking away parking places for horse trailers is the beginning of becoming just another crowded Southern California beach without any unique qualities. I ask that you keep your earlier promise to provide ample space for parking for horse trailers to continue the draw of seeing horses and riders enjoy the coast.

LA-3

Sincerely,

Lee Ashworth  
1485 Camino Mariposa  
Nipomo, Ca 93444

**Response to Email from Lee Ashworth, dated January 21, 2011**

<b>Comment No.</b>	<b>Response</b>
LA-1	This comment describes the commenter's experience riding horses at Pismo State Beach, but makes no substantive comments on the EIR. No further response is necessary.
LA-2	This comment questions the validity of the equestrian parking survey. Refer to Master Response EQ-2.
LA-3	The comment requests that ample space for parking be provided as promised. Please refer to Master Responses EQ-1 and EQ-12 regarding equestrian parking.

Emily Creel

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**From:** Mary Reents  
**Sent:** Friday, January 21, 2011 6:43 PM  
**To:** Emily Creel  
**Subject:** FW: vote

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**From:** hanorahflood@gmail.com on behalf of Hanorah Hernandez  
**Sent:** Fri 1/21/2011 6:50 PM  
**To:** Mary Reents  
**Subject:** vote

Unacceptable..This is a miniscule amount of space and differs drastically from what we were told.  
I totally oppose the Environmental Impact Report for the **Grover Beach Lodge and Conference Center** for ONLY 5 horse trailer parking spaces (no dimension listed) to ride on Pismo Beach (equestrians only access to ride on Pismo State Beach).

NH-1

Nora Hernandez  
[nora@bonnetslace.com](mailto:nora@bonnetslace.com)  
(805) 801-4557  
[www.bonnetslace.com](http://www.bonnetslace.com)

**Response to Email from Nora Hernandez, dated January 21, 2011**

<b>Comment No.</b>	<b>Response</b>
NH-1	This comment opposes the proposal to provide five equestrian parking spots. Refer to Master Response EQ-5.

Emily Creel

From: Mary Reents  
 Sent: Friday, January 21, 2011 3:34 PM  
 To: Emily Creel  
 Subject: FW: response to the proposed Grover Beach Conference Center and Lodge

From: Ed Muraski [mailto:demuraski@charter.net]  
 Sent: Fri 1/21/2011 3:24 PM  
 To: Mary Reents  
 Subject: response to the proposed Grover Beach Conference Center and Lodge

Dear Mary B. Reents and city planners,

At the last meeting to inform the public who found out about the proposed development of a Conference Center and Lodge at the corners of Grand and Hwy 1, we and other members of the community felt your plan had many concerns. We would like to address several issues concerning the proposed Grover Beach development. Dianna and I are members of the community who walk our animals, ride horses and ride our bikes on these beaches and our tax money supports the state park system, roads to and parking at the beach, yet we are being pushed aside and our parking and access will be reduced by this development. We also own a B & B Health Spa and send visitors to the beach as well.

We are not happy that this development is removing areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less. We are concerned about using public park land to build a commercial resort. This is setting an unacceptable precedent for our area.

This affects every one in our Coastal Community. We are concerned about the reduced number of parking places for everyone. The parking area for Fins restaurant and the parking area behind it are frequently full, but you propose to reduce that parking which will affect horse riders, motor home campers, ATVers with toy boxes, dog walkers and the community in general from accessing the beach. The attached pictures show RV's parked with horse trailers and at Fins, but no RV parking is in the plan. This limits our access to the beach.

The proposed parking for horses is inadequate. It has very little room between rigs which creates a dangerous situation because it does not allow for saddling, brushing, and rigging the horses for a ride. Horses are easily frightened by close quarters and noise and could buck and damage the horses, riders and rigs. These tight spaces also create hazard since riders generally tie horses to the side of their rig. The water troughs and ties planned are not necessary. Riders carry their water and tie their horses to the trailer where the saddles are.

DEM-4

Since you are reducing all parking, the horse parking will not be used for horses alone. Since motor home parking is being reduced also Motor homes will park in the horse parking area reducing horse parking even more. The proposed plan has a lack of parking for large motor homes, waiting for spaces in the park, eating at Fins and letting air out or putting air in their tires. The city does not have staff to police the parking, so motor homes will park there too.

DEM-5

DEM-6

The State Park signed a statement indicating they would keep parking for horses in the park after they eliminated parking for and horse riding in Oso Flocko. That agreement is available and the state park has copies as well.

DEM-7

We also spoke to people in motor homes parked in the lot and asked them if they would stay in the hotel as the proposed Grover Beach development contractor representative suggested they would and they said absolutely not. They said that's why they purchased motor homes.

DEM-8

Why are we using resources to build a new resort while several hotels and resorts in the surrounding community are in receivership and one completed Resort on 101 remains unoccupied? Why are we removing State Park land from the community who paid for it?

DEM-9

DEM-10

We have talked to several people on rides at the beach who said they signed up at the Grover Beach City Office at the last meeting to be contacted to attend the next discussion or planning meeting regarding this development, but were not contacted. Why were people not contacted when it was promised that they would be? We left our name to be contacted and were not contacted as well.

DEM-11

DEM-1

DEM-2

DEM-3

Ride Nipomo Horse Riders

The attached pictures were taken on the day after Grover Beaches last planning meeting. It was not a week end or holiday. There were ten (10) horse trailers, two 5th wheelers, one Hummer, 3 large rigs, and one delivery truck for Fins at the lot in the one hour of time Dianna was there. See attached pictures which were not enhanced or altered. On a normal week end there are usually more motor rigs, horse trailers and community members and visitors parking in the parking lots available. We are documenting the parking use with each visit. Most community members do not go to the beach area when we know it is crowded. Motor homes must park at Fins or the horse area at tide high and wait for the tide to come down. Where are they going to park?

DEM-12 e-mailed: 1-21-2011

Ed J. Muraski, Ed.D.  
Centaur Health Resort and Spa  
Web: [www.centaurspa.com](http://www.centaurspa.com)  
Phone: 805 474-9217

This fact that the city has not planned for adequate horse parking, motor home parking or parking for local citizens who wish to access the beach, concerns us about the planning for the overall proposed project. The idea of removing public State Park areas from public use and removing this area from the public use is unacceptable. Again, you can see from the pictures that during the day these pictures were taken there are more horse trailers on the lot than you they propose parking on this weekday. If there is not adequate parking for our B&B Spa guests here we will send our Spa guests to Pismo Beach, not Grover Beach.

DEM-13

DEM-14

DEM-15

DEM-16

The city is not addressing the needs of the community when their idea of a survey is to check the parking lot from 12 noon to 4P.M. That is the same concept as checking a golf course usage at 4:30 in the afternoon. That is a low use time. Highest parking for horses is frequently morning times. We are losing State Park Land of which the citizens own. Telling the public we can park at the lodge is unacceptable. At the last meeting the city manager said this development has not been formally presented to the public. It needs to be.

DEM-17

DEM-18

DEM-19

Sincerely,

Ed and Dianna Muraski

Attached are pictures of the parking areas, Tuesday following the last city meeting 6-28-10.

Copies: Tribune

**Response to Email from Dianna and Ed Muraski, Ph.D., dated January 21, 2011**

Comment No.	Response
DEM-1	The comment introduces the comment letter and provides a history on the commenters' activities in the area. The comment does not make substantive comments on the EIR and no further response is necessary.
DEM-2	The comment questions the appropriateness of removing public State Park lands and leasing them for commercial development. Please refer to Master Response EQ-6 related to the leasing of park lands to a commercial developer.
DEM-3	This comment discusses a reduction in parking spaces that will affect everyone who uses the recreational area. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. While parking areas may be situated in various onsite inland locations at a further distance from the beach, all formal existing parking is being retained onsite. Impacts related to moving public parking back a couple hundred feet are not impacts falling under CEQA. Therefore, the EIR found this to be an insignificant impact. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking.
DEM-4	This comment states that the proposed equestrian parking is inadequate and improperly designed. Please refer to Master Responses EQ-1, EQ-2, and EQ-3 related to the amount, need, and design of the equestrian parking area.
DEM-5	The comment states that the proposed water troughs and ties are not necessary. The equestrian parking area was intentionally left open to many different designs and configurations to allow for equestrian input in the design process. The applicant is considering leaving the entire parking area un-striped and open (like existing conditions) in order to accommodate many different types of vehicles and trailer setups. This would allow equestrian users to design the parking area to best fit their needs.
DEM-6	This comment states that large non-equestrian vehicles will utilize the equestrian parking area. Please refer to Master Response EQ-10.
DEM-7	This comment relates to the agreement to provide equestrian parking at the project location at the close of Oso Flaco Lake to horses. Refer to Master Response EQ-13, above. Also note that equestrian parking is not being removed from the site; an equestrian parking area sufficient to accommodate 10 to 15 horse trailers has been proposed to retain this use.
DEM-8	This comment states that motor home owners that utilize onsite parking would not stay in the lodge. It is unclear how this comment relates to the environmental analysis of the EIR. However, it is noted that motor home owners are more likely to stay in their motor homes than rent out other accommodations.

Comment No.	Response
DEM-9	The comment questions the need for a new hotel when several other area hotels are unoccupied. This is not an issue covered by CEQA. CEQA only requires an analysis of the proposed project’s consistency with local plans, policies, and regulations. This project was found to be generally in compliance with all applicable policies (Refer to Section 3.5, Environmental Setting – Consistency Analysis, and Table 3-1 for the Consistency Analysis).
DEM-10	The comment questions the removal of state park land from the community who paid for it. The project does not propose the removal of state park lands, but rather would result in better utilization of these lands through project design and public facility improvements. The project would benefit public beach access in general, through added boardwalks and paths throughout the project, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, additional concessions in the form of lower cost snack bar, outdoor seating, public parking, a public drop off area, and landscape enhancements to increases the aesthetic value of the property.
DEM-11	This comment states that several people have requested that they be contacted to attend any discussions and/or public meetings regarding this development, but were not contacted. The City has not conducted any additional public meetings or discussions on the project, and the project is not expected to be agendized in front of the Planning Commission until July 2011. The City has complied with all public noticing and meeting requirements under CEQA and the municipal code.
DEM-12	The comment refers to pictures taken at the project site, but the email did not contain any pictures attached. A response was sent to the commenter requesting the pictures, but no response was received. The commenter states that there were as many as 17 large vehicles in the dirt parking area and that most equestrians do not come to the beach when it is crowded. Please refer to Master Response EQ-2 regarding the equestrian usage survey.
DEM-13	This comment states that motor homes and RVs utilize the dirt parking lot when they are unable to drive onto the beach. Please refer to Master Response EQ-10.
DEM-14	The commenter expresses concern for adequate horse, motor home, and public parking. The proposed project has been designed to retain all 160 formal public parking spaces currently existing at the project location. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact. Refer also to Master Responses EQ-1, EQ-2, and EQ-10 related to motor home and equestrian parking.
DEM-15	This comment questions the removal of public state park areas from public use. Please refer to the response to Comment No. DEM-10 and Master Response EQ-6, above.

Comment No.	Response
DEM-16	This comment challenges the amount of equestrian spaces being proposed in relation to existing needs. Please refer to Master Responses EQ-1 and EQ-2, above, related to equestrian usage and spaces proposed. The commenter also states that if sufficient parking is not provided, their health spa guests would be forced to go to Pismo Beach. While the City recognizes the importance of maintaining the local tax base and providing amenities for the local citizens, the EIR did not find that the amount of parking proposed was insufficient. Refer to response to Comment No. DEM-14, above.
DEM-17	This comment challenges the results of the equestrian parking survey. Refer to Master Response EQ-2, above.
DEM-18	The comment states that the project would result in the loss of state park land which citizens own. Note that local citizens do not “own” state park land. That land is owned and managed by the state for the public benefit. Please refer to Master Response EQ-6 above.
DEM-19	This comment requests that the proposed project be formally presented to the public. The project has properly been through the CEQA-required public comment period. This 30-day period provides all members of the public to participate in the process by submitting comments on the EIR and project.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 22, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed conference center and have several concerns and comments. They are related to the Equestrian parking and are as follows:

- The suggested equestrian parking location South of Grand Avenue is on existing dunes. However, it is a good location and I believe the minor environment issues can be dealt with. Those particular dunes are primarily covered with Iceplant, a non-native cover. Making a parking area adjacent to the street and bathrooms would be a good choice, of the ones offered. I do request that it be enlarged from 21,000 sq ft. to 30,000 sq ft. to accommodate the number of users it would have. Just as other user groups do, many equestrian groups hold "group" rides at the beach as a special ride bringing members together. I have often witnessed as many as 25 trailers with multiple horses parked for these gatherings. If spaces are limited, then equestrians are being denied public access, yet other user groups are not limited in a like manner.
- The suggested alternative location North of the ranger station West of and alongside Highway 1 (for the Equestrian parking) received little or no consideration. This would also be an excellent location, is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.
- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

LC-1

LC-2

LC-3

Response to Draft EIR:

- Accomodation for Disabled equestrians (riders and drivers) needs to be addressed. They require more than the normal space for parking and accommodating their carts and wheeled vehicles.

LC-4

Sincerely,

*Linda Clarke*

Linda Clarke  
West Coast Rocky Mountain Horse Club  
San Luis Obispo Parks, Open Space and Trails Foundation

**Response to Letter from Linda Clarke, dated January 22, 2011**

Comment No.	Response
LC-1	This comment discusses the need for additional equestrian parking. Please refer to Master Response EQ-1 and EQ-2 related to the need and number of spaces provided. The comment also states that the suggested parking location south of Grand Avenue is a good location where environmental impacts could be mitigated. The City and applicant agree and have brought forward this design because of the numerous benefit of locating equestrian parking in this area. However, the EIR recommended an alternative location as the environmentally superior alternative to avoid ESHAs and dune habitat. Refer to Master Response EQ-7, above.
LC-2	This comment suggests an alternative location for equestrian parking north of the ranger station along Highway 1. Please refer to Master Response EQ-9, above.
LC-3	The comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2, above. Note that the survey included a period of over a month; therefore, it does not appear to be a last minute addition to the EIR. The EIR preparers do not believe a year-long survey, with counts taken at morning, afternoon and night every single day is necessary to establish an estimated use of this parking lot.
LC-4	This comment states that accommodation for disabled equestrians needs to be addressed. The EIR does not distinguish between disabled and non-disabled equestrian parking needs. However, the project applicant is proposing to leave the equestrian area un-striped, much like existing conditions. This would enable any variety of trailer types and sizes to utilize the parking area. Refer also to Master Response EQ-3, above, related to design and safety of the equestrian parking area.

Emily Creel

From: Mary Reents  
Sent: Monday, January 24, 2011 11:39 AM  
To: Emily Creel  
Subject: FW: ltr.Grover 1.24.11

From: Pamela Krahl [mailto:pkrahl@wildblue.net]  
Sent: Mon 1/24/2011 11:10 AM  
To: Mary Reents  
Subject: ltr.Grover 1.24.11

January 24, 2011

Ms. Mary B. Reents  
1422 Monterey St., Suite C200  
San Luis Obispo, CA

Mr. Bruce Buckingham  
City of Grover Beach

Dear Ms. Reents, and Mr. Buckingham,

This letter is to reiterate my concerns as to the development of the hotel and convention center in Grover Beach and the information in the draft Environmental Impact Statement.

First, it is indeed a rare project, especially in a waterfront area, that does not limit access to the existing area for current users. I appreciate that in planning this development, efforts have been made with paths, etc. to allow patrons of the facility to access the beach, but no mention of where local people hoping to park and walk onto the beach will be able to park.

It is still not clear as to the number and location of the oversize parking spaces within the planned parking areas, to accommodate motor homes and RV's with trailers or ATV carriers. Will those currently using the dirt lot shift to "Finn's" lot?

My biggest concerns are with the equestrian parking area proposed. In reviewing the draft EIR, the proposed lot on the south side of West Grand Ave. seems to be essentially the only option on the table. One other site is being considered, within the main parking area of the project ("B") but this will be very limited and inadequate. Several other options were discarded as "not feasible."

Again, usage of the current lot was underestimated by the recent, limited "snap shot" survey. Key days and times were not evaluated, and even by the spotty tally, some days showed as many as 5-22 other types of vehicles sharing the parking with multiple horse trailers of all sizes.

PK(a)-4

The area labeled "C", as proposed at 22,000 square feet is also too small for the projected number of vehicles now using the space, and for future growth. Please reference the detailed and useful document [www.fhwa.dot.gov/environment/txpubs/0723281](http://www.fhwa.dot.gov/environment/txpubs/0723281) which indicates requirements for parking equestrian vehicles, from the Department of Transportation. I will also send a hard copy of this document, as well as a sketch of a proposed lot, indicating the need for at least 33,000 square feet.

PK(a)-5

Even at this size, there will need to be a plan for overflow parking, at a nearby site. If the entry and exit lanes to area "C" are designed at the proper angles and curves, as I think has been proposed, I believe this will cut down on the use of the equestrian lot by RV's and campers exiting the beach.

PK(a)-6

PK(a)-7

I have significant concerns that the Coastal Commission will not allow the removal of this dune area, and thus feel a real alternative(s) must be available in case this option fails. What details are available on this other option? If it does pass the commission, the details of the management of drifting sand that may escape the retaining wall proposed, should be addressed.

PK(a)-8

PK(a)-9

Thank you for your consideration of these issues.

Yours truly,

*Pamela Krahl*

Central Coast of California  
Arabian Horse Association

PK(a)-1

PK(a)-2

PK(a)-3

## Response to Email from Pamela Krahl, dated January 24, 2011

Comment No.	Response
PK(a)-1	The comment states that the project does not describe where beach visitors will park and be able to walk to the beach. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. While public parking has been relocated and situated in various onsite location that may require beach goers to walk a further distance to reach the beach, this is not an impact that would be considered significant for CEQA purposes. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
PK(a)-2	The comment questions the location of motor home and RV parking. Please refer to Master Response EQ-10, above.
PK(a)-3	This comment challenges the proposed equestrian parking area and alternatives analyzed in the EIR. CEQA requires a range of reasonable alternatives to be analyzed in an EIR. The EIR is not required to discuss alternatives that are not feasible or that would result in greater environmental impacts. The commenter states that alternative parking north of Grand Avenue would be inadequate. However, this space is of equal size and provides equal flexibility as the proposed location south of Grand Avenue. The EIR concluded that the environmentally superior alternative would be to locate equestrian parking in this location in order to avoid impacts to <u>potential</u> ESHA and dune habitat. This location would provide 10 to 15 equestrian spaces. Please refer also to Master Response EQ-8 related to alternatives brought forward for analysis in the EIR.
PK(a)-4	The comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2, above.
PK(a)-5	This comment states that the proposed parking areas are too small and that 30,000 feet are needed. The commenter refers to the <i>Equestrian Design Guidebook for Trails, Trailheads and Campgrounds</i> for references of equestrian parking design requirements. This document will be forwarded to the City for their consideration. Please refer to responses to Comment Nos. PK(b)-1 and PK(b)-2, below, for responses to the Guidebook and parking configuration sketch. Also refer to Master Responses EQ-1 and EQ-2 related to the number of equestrian spaces needed/to be provided.
PK(a)-6	The comment states that, even with a 30,000 square foot parking area, there would still be the need for overflow parking at a nearby site. Please refer to Master Responses EQ-1 and EQ-2, related to the need and number of equestrian spaces.
PK(a)-7	This comment refers to use of the equestrian parking area by other large vehicles and campers. Please refer to Master Response EQ-10.
PK(a)-8	The commenter questions the likelihood of the Coastal Commission's approval of the equestrian parking area south of Grand Avenue and states that details for the other alternative need to be made available. Please refer to Master Response EQ-7 related to the CCC's statements that they will not support development in the dune area south of Grand Avenue and the EIR discussion of equestrian parking alternatives. Also note that CEQA does not require alternatives to be analyzed with the same level of detail required for the proposed project components. If the CCC

Comment No.	Response
	rejects the proposed location, a new location and design could be commented on as part of the public hearing process.
PK(a)-9	<p>The comment states that the management of drifting sand that may escape the retaining wall proposed should be addressed. Please refer to Geology and Soils mitigation measure GS/mm-5, which addresses this concern:</p> <p>“Prior to issuance of a grading permit for the equestrian parking area, the applicant shall include a retaining wall and fencing or other method, if needed, along the interior perimeter of the parking area to retain sand and to act as a deterrent to equestrians and horses from crossing the fill area to gain access to trails. The retaining wall shall be of sufficient height to reduce fill from falling back into the parking area.”</p>

Mary B. Reents SWCA Environmental Consultant  
1422 Monterey St Suite C200  
San Luis Obispo, CA 93201

RECEIVED JAN 27 2011

January 24, 2011

Mary B. Reents,

The City of Grover Beach is collaborating with the State park officials in planning a Lodge and Conference Center (LCC) at the corner of Grand and Hwy 1.

We became aware of this plan and noticed that the city is reducing the number of parking spaces for parking. After reviewing the Environmental Impact Report (EIR) we noticed they were reducing all parking and limiting everyone's access to the beach. The LCC will have a large parking lot for their guest.

PLM-1

We are not happy that this development is removing areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less. We are concerned about using public park land to build a commercial resort.

PLM-2

The project does not show adequate horse parking, motor home parking, or parking for local citizens who wish to access the beach. This concerns us about the overall planning for this proposed project. The idea of removing public State Park areas from public use is unacceptable. This issue limits access to the beach, and our land and park will be gone. Where will the dog walkers, joggers, walkers, bike riders, and horse riders park?

PLM-3

PLM-4

PLM-5

We do not approve the City of Grover Beach plan for the Lodge and Conference Center or the use of State park land for this use.

PLM-6

Sincerely,



Patricia L. Mensing

E-mail: plmensing@yahoo.com

**Response to Letter from Patricia L. Mensing, dated January 24, 2011**

Comment No.	Response
PLM-1	<p>The commenter states that the project will reduce parking for all uses at the site. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p> <p>The project would also protect and enhance public access to the beach through added boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, additional concessions, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.</p>
PLM-2	<p>The comment objects to the taking public lands out of public use and leasing it to a commercial developer. Please refer to Master Response EQ-6 related to the commercial leasing of state park lands.</p>
PLM-3	<p>This comment states that the project does not show adequate parking for equestrians, motor homes, or local citizens. The proposed project has been designed to retain all 160 formal public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p>
PLM-4	<p>This comment objects to the use of public lands for commercial purposes. Refer to Master Response EQ-6, above.</p>
PLM-5	<p>The commenter asks where public beach users will park. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. While these spaces are reconfigured and situated in several onsite locations and would require users to walk a greater distance to the beach, this does not rise to the level of a significant impact covered by CEQA. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p>
PLM-6	<p>The commenter opposes the project and the use of state park land for this use. Refer to Master Response EQ-6 and responses to Comment Nos. PLM-1 through PLM-5, above.</p>

Emily Creel

**From:** Mary Reents  
**Sent:** Monday, January 24, 2011 11:39 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Development

**From:** Ellen Morris [mailto:emorris2572@yahoo.com]  
**Sent:** Mon 1/24/2011 12:16 PM  
**To:** Mary Reents  
**Subject:** Grover Beach Development

Mary B. Reents SWCA Environmental Consultant  
1422 Monterey St Suite C200  
San Luis Obispo, CA 93201

Mary B Reents and Grover Beach City officials,

We are not happy that Grover Beach is planning to remove areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less.

**MEM-1**

We are concerned about using public park land to build a commercial resort. Private lands are for developers not State Park lands paid for by the tax payers for our use. We recommend using the land for more parking not a conference center.

**MEM-2**

Sincerely,

Mark and Ellen Morris

**Response to Email from Mark and Ellen Morris, dated January 24, 2011**

Comment No.	Response
MEM-1	This comment objects to the use of public state park lands for commercial development. Please refer to Master Response EQ-6, above.
MEM-2	The comment recommends using the land for more parking rather than for the proposed lodge and conference center facilities. This comment does not make substantive comments on the environmental analysis in the EIR, but will be forwarded on the City for their consideration. The city is required to balance a large variety of public objectives in approving/permitting projects. The City will take this and other comments into consideration when making their decision on whether or not to approve this project. However, the desire to use the land for other purposes is not an issue that requires discussion under CEQA.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Monday, January 24, 2011 11:37 AM  
**To:** Emily Creel  
**Subject:** FW: Equestrian parking

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**From:** Jacqueline Pamplona [mailto:jpamplona@earthlink.net]  
**Sent:** Mon 1/24/2011 8:57 AM  
**To:** Mary Reents  
**Subject:** Equestrian parking

I am a resident of Arroyo Grande and ride and drive my carriage on Pismo Beach frequently. I have a 20 foot trailer and need enough room to unload both horse and carriage. I belong to a driving club and other members also drive and ride on the beach. We avoid the times when the beach is crowded and usually go in the morning. I doubt if any of our rigs were included in the count taken. I also have visitors who come from out of town who come just to be able to ride on the beach. These people keep their horses at my house but stay in hotels, and do the tourist things while they are here. It will be a shame if you do not have adequate parking for equestrians as promised.

Sincerely, Jackie Pamplona

JP-1  
JP-2  
JP-3  
JP-4

**Response to Email from Jackie Pamplona, dated January 24, 2011**

<b>Comment No.</b>	<b>Response</b>
JP-1	This comment relates to the design requirements for equestrian parking. Please refer to Master Response EQ-3.
JP-2	This comment states that equestrians typically ride in the mornings. Please refer to Master Response EQ-2.
JP-3	The comment discusses out-of-town users who ride at Pismo State Beach and contribute to the local tax base. Please refer to the discussion of out-of-area users in Master Response EQ-2.
JP-4	The comment reiterates the need for adequate parking for equestrians. Please refer to Master Response EQ-1.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Monday, January 24, 2011 11:37 AM  
**To:** Emily Creel  
**Subject:** FW: Grover beach parking

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**From:** Steve Sassoon [mailto:ssassoon@abf.com]  
**Sent:** Mon 1/24/2011 9:14 AM  
**To:** Mary Reents  
**Cc:** kowgrl@juno.com  
**Subject:** Grover beach parking

Mary B. Reents SWCA Environmental Consultant  
1422 Monterey St Suite C200  
San Luis Obispo, CA 93201

Mary B Reents and Grover Beach City officials,

We are not happy that Grover Beach is planning to remove areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less.

We are concerned about using public park land to build a commercial resort. Private lands are for developers not State Park lands paid for by the tax payers for our use. We recommend using the land for more parking not a conference center.

Sincerely, Steven A. Sassoon  
P.o. Box 221505  
Newhall, Ca 91322

661-733-6534

SSa-1

SSa-2

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**Steve Sassoon**  
SR Account Executive  
818-897-2266  
818-897-6658 Fax:  
ssassoon@abf.com



**TimeKeeper**  
800-874-2061  
Whatever, Whenever, Wherever, Guaranteed.

**Response to Email from Steve Sassoon, dated January 24, 2011**

<b>Comment No.</b>	<b>Response</b>
SSa-1	This comment challenges the use of public state park lands for commercial uses. Please refer to Master Response EQ-6, above.
SSa-2	The comment recommends using the land for additional parking rather than the proposed lodge and conference facilities. This comment does not make substantive comments on the environmental analysis in the EIR, but will be forwarded on the City for their consideration. The city is required to balance a large variety of public objectives in approving/permitting projects. The City will take this and other comments into consideration when making their decision on whether or not to approve this project. However, the desire to use the land for other purposes is not an issue that requires discussion under CEQA.

**Superior Guest Care Inc.**

RECEIVED JAN 27 2011

DBA: Fin's Seafood Restaurant  
Pismo Beach Golf Course

Bruce Buckingham  
25 W. Grand Ave.  
Grover Beach, Calif. 93433

Community Development Director  
City of Grover Beach

RE: Notice of Availability for the GB Lodge Draft EIR

Dear Mr. Buckingham, January 24, 2011

We have a list of concerns regarding the Environmental Impact Report Draft on the Grover Beach Lodge and Convention Center. They are as follows:

1. Meadow Creek

During the heavy December rains, Meadow Creek flooded onto surrounding areas, including the golf course. We are concerned that any additional run-off from this project will exacerbate this problem.

**SGC-1**

2. Parking

The proposed parking area designated adjacent to Fin's Restaurant does not provide adequate parking for the restaurant. There is no exclusive enforceable parking for Fin's customers who will be competing against the beach users. This will directly impact Fin's ability to exist and succeed financially. Pursuant to Table 2-1 Proposed Project Improvements, the existing state park spaces to be replaced are 160. This does not take into account the dirt overflow parking that holds in excess of a minimum 125 additional spaces.

**SGC-2**

**SGC-3**

We strongly believe that the proposed parking is inadequate. As an example, on Monday of the Martin Luther King holiday weekend 2011, all 160 spaces were filled during most of the daylight hours. The dirt field was used as an overflow for over 50 cars, 10-15 travel trailers as well as 5-10 horse trailers. This is very typical of summer and all holiday weekends.

**SGC-4**

3. Traffic Flow

Currently, the traffic flow from Grand Ave. and Highway 1 from the north is extremely congested. Current entry onto La Sage Drive is dangerous. Any additional usage should require upgrades to the existing conditions.

**SGC-5**

Thank you for your consideration on these matters.

President  
*Bruce Van Vort*  
Superior Guest Care

Vice President  
Superior Guest Care

Bruce Van Vort

Lucille T. Osborn  
*Lucille T. Osborn*

**Response to Letter from Superior Guest Care Inc. dba Fin’s Seafood Restaurant, Pismo Beach Golf Course, dated January 24, 2011**

Comment No.	Response
SGC-1	The comment raises issues associated with flooding of Meadow Creek. Please refer to the response to Comment No. Caltrans-2 through Caltrans-6, above.
SGC-2	The comment states that the parking area adjacent to Fin’s Restaurant does not provide adequate parking and that there is no exclusively enforceable parking for Fin’s customers competing against other beach users. Approximately <del>40</del> <u>52</u> parking spaces are proposed directly adjacent to Fin’s. This parking area would be for short-term parking, principally for the restaurant. However, the amount of parking for the restaurant will be determined by State Parks as part of the concession contract. All other public parking has been retained under the proposed project, but has been reconfigured and situated at various onsite locations. These public users will be required to walk a greater distance to the beach and/or Fin’s; however, this is not an impact that would rise to the level of significance under CEQA. This amount of parking is considered sufficient to accommodate Fin’s customers under average conditions, and impacts are considered less than significant under CEQA thresholds.
SGC-3	<p>The comment raises the issue related to the overflow parking that currently exists in the dirt lot, and claims that parking is not being preserved with the proposed project. The project has included 160 public parking spots to retain existing formal parking at the site consistent with LCP requirements. The project also includes a separate equestrian parking area that is intended to replace the equestrian parking in the adjacent dirt lot. However, the State Park parking survey (Appendix F of the EIR) found that non-equestrian vehicles also use this lot for overflow parking, particularly on peak days and holidays. The survey identified as many as 23 vehicles in the lot over Labor Day weekend.</p> <p>Although State Parks has historically allowed parking in this area, no formal right to park has ever existed at this location. State Parks is under no obligation to provide, protect, or maintain parking at its current capacity at this location. The City and project applicant have taken considerable effort in preserving onsite parking and have met all requirements of the LCP.</p> <p>The EIR preparers recognize that this parking use may not entirely be preserved by the project, which has proposed approximately <del>37,000</del><u>21,000</u> square feet for equestrian trailer parking as well as pull through spaces within the public and lodge parking areas that would accommodate other oversized vehicles. However, this is not an impact that would rise to a level of significance under CEQA thresholds. Ultimately, this is a policy decision in which the City must balance potential adverse impacts against all beneficial aspects of the proposed project.</p>
SGC-4	This comment reiterates the commenter’s belief that proposed parking is inadequate. Note that the information relating to parking conditions on Martin Luther King weekend, while useful in gauging peak usage, constitutes the maximum peak usage and congestion at the site. The EIR does not aim to design improvements for this specific condition, but rather mitigates project impacts to accommodate reasonable demand on most days under normal circumstances. State Parks has monitored and maintained this parking area for many years. Based on their observations, the proposed parking would be sufficient to accommodate typical demand on most days. Please refer to the response to SGC-2 and SGC-3, above, for additional information.

Comment No.	Response
SGC-5	<p>The comment states that traffic flow from Grand Avenue and Highway 1 is currently extremely congested. The EIR calculated Level of Service levels for this intersection, and concluded that the intersection currently operates at LOS B (LOS levels range from LOS A to LOS F, with LOS A being the best traffic conditions and LOS F representing major traffic constraints). With implementation of the proposed project, the Highway 1/Grand Avenue intersection would operate at LOS B to C during peak hours. This level of service meets the target LOS for this intersection established by the Grover Beach Circulation Element (LOS C). Therefore, the project is not expected to push traffic at the intersection to unacceptable levels. Re-striping of lanes at this intersection has been proposed to reduce confusion and improve traffic conditions. This is considered an insignificant impact.</p> <p>The comment points out that entry onto Le Sage Drive is dangerous and recommends upgrades to existing conditions. <del>Transportation and Traffic Impact 4 recognizes the impacts the project would have on the Highway 1/LeSage Drive intersection. Traffic mitigation measure TC/mm-5 (TC/mm-6 in the Draft EIR) mitigates these impacts to insignificance by recommending the addition of a left turn pocket to allow for improved access.</del> Refer to Section 4.8.5, Transportation/Traffic – Project-Specific Impacts and Mitigation Measures, of the EIR.</p>

**Emily Creel**

**From:** Mary Reents  
**Sent:** Tuesday, January 25, 2011 10:10 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Development

**From:** Warren and Ann Crain [mailto:wcrain@att.net]  
**Sent:** Tue 1/25/2011 7:25 AM  
**To:** Mary Reents  
**Subject:** Grover Beach Development

Mary B. Reents SWCA Environmental Consultant  
1422 Monterey St Suite C200  
San Luis Obispo, CA 93201

Mary B Reents and Grover Beach City officials,

I am not happy that Grover Beach is planning to remove areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less.

AC-1

I am concerned about using public park land to build a commercial resort. Private lands are for developers not State Park lands paid for by the tax payers for our use. We recommend using the land for more parking not a conference center.

AC-2

I'm very concerned that the project does not show adequate horse parking, motor home parking, or parking for local citizens who wish to access the beach. This concerns us about the overall planning for this proposed project. The idea of removing public State Park areas from public use is unacceptable. This issue limits access to the beach, and our land and park will be gone. Where will the dog walkers, joggers, walkers, bike riders, and horse riders park?

AC-3

AC-4

AC-5

I was there last Friday, 1/22, to ride my horse with a friend. When we arrived in the morning at the dirt parking lot next to Finn's I counted 9 horse trailers, two RV's and a trailer and this was a week day, not a busy weekend. When my friend and I returned to our trailer in the afternoon I could see that several more trailers had pulled in and more riders where getting their horses ready for an afternoon ride.

AC-6

The proposed parking for horses is inadequate. A large area is need for horse trailers. People need room to get their horses in and out of the trailer safely and room to tie up their horses on the side of the trailer. Room is also needed to maneuver the bigger horse trailers and RV's.

AC-7

The Pismo Dunes is a south county treasure. It's a wonderful place to bring a horse for a ride through the Dunes. Please do not limit access to this wonderful park to local San Luis Obispo

AC-8

county residents by not providing adequate parking. It would be a shame if only those that can drive down on the beach had access to the Pismo Dunes

AC-8 (cont'd)

I do not approve the City of Grover Beach plan for the Lodge and Conference Center or the use of State park land for this use.

AC-9

Sincerely,

Ann Crain  
[wcrain@att.net](mailto:wcrain@att.net)

**Response to Email from Ann Crain, dated January 25, 2011**

Comment No.	Response
AC-1	This comment relates to the removal of state park lands from public use and leasing for commercial development. Please refer to Master Response EQ-6.
AC-2	The comment recommends using the land for additional parking rather than the proposed lodge and conference facilities. This comment does not make substantive comments on the environmental analysis in the EIR, but will be forwarded on the City for their consideration. The City is required to balance a large variety of public objectives in approving/permitting projects. The City will take this and other comments into consideration when making their decision on whether or not to approve this project. However, the desire to use the land for other purposes is not an issue that requires discussion under CEQA.
AC-3	This comment states that the project does not show adequate parking for equestrians, motor homes, or local citizens. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
AC-4	This comment objects to the use of public lands for commercial purposes. Refer to Master Response EQ-6, above.
AC-5	The commenter asks where public beach users will park. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. While these spaces are reconfigured and situated in several onsite locations and would require users to walk a greater distance to the beach, this does not rise to the level of a significant impact covered by CEQA. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
AC-6	The commenter states that on Friday, January 22, 2011, there were 11 vehicles in the dirt lot. Refer to Master Response EQ-2.
AC-7	This comment addresses the size and spacing needed in an equestrian parking area. Please refer to Master Response EQ-3.
AC-8	This comment requests that access to Pismo State Beach not be restricted through inadequate parking. Please refer to the response to Comment No. AC-5, above, and Master Response EQ-1.
AC-9	The commenter opposes the project and the use of state park land for this use. Refer to Master Response EQ-6 and responses to Comment Nos. PLM-1 through PLM-5, above.

January 25, 2011

Gail Kemble; Gailkemble@aol.com

Broker Associate, Century 21 Hometown Realty, Pismo Beach

Owner Rainbow Ventures Property Management

Member of CMA

Member of Pismo Beach Chamber of Commerce

Member of Ride Nipomo, Longriders, West Coast Rocky Mountain Horse Club

President of Thundering Hooves of the Central Coast

825 Bear Canyon Lane, Arroyo Grande, CA 93420

805-440-9708

RE: The Draft Environmental Impact Report for the Grover Beach Lodge and Conference Center; Equestrian Survey reflecting # of parking spaces allocated to riders.

To Whom It May Concern:

Good afternoon,

As you can see from my letterhead above, I am a member of various riding clubs as well as other organizations on the Central Coast and have been since 1996. So I feel my experience with both public interest as well as my own should be heard in regards to the proposed staging area for equestrians at the end of Grand Avenue in Grover Beach.

As a full time real estate agent, I have been one of the top producers of Century 21 Hometown Realty for many years. I specialize in listing both beach and ranch properties. I can absolutely assure you that one of the reasons equestrians move here and even rent our beach houses in the Oceano Strand area is to be able to utilize the beach as one of their main places to ride and enjoy the Central Coast. Even if I sell homes all the way to Paso Robles and as far south as Santa Barbara, one of the main draws for these horse lovers is to be able to trailer up to Grover Beach, have a safe place to park their rigs, and oftentimes stay for lunch, thereby spending their money at the local restaurants.

GK-1

In addition, I manage 8 beach houses in the Oceano Strand area as vacation rentals. We have literally thousands of tourists that rent these houses, bringing thousands of dollars of revenue into the area. Many of them bring their horses and trailers with them, knowing there is a safe place to park with their animals. In addition, there is a new County rule as of November, 2010, that states that guests staying less than 30 days now have to pay an 11% bed tax to the County.

GK-1 (cont'd)

On any given day, there could be as many as 20-25 horse trailers parked in the area that is currently used for that purpose at the end of Grand. I have just become a member of CMA and I am now starting to make a log of the number of trailers, trucks, RV's and the actual number of horses from each trailer. I alone have 4 horses and 2 trailers and many times, I have all of them at the beach at one time along with a lot of other people who do the same thing. There is one individual who brings his 6 horse trailer to the beach and rents his horses to designated guests and takes them for rides up and down the beach. His truck and trailer alone take up a large space for parking.

GK-2

GK-3

The most important thing is safety for the people and their animals. Many members of the horse community even avoid riding in the afternoon because of the wind and the late afternoon weekends when there is a mass exodus of RVs and trailers coming up the end of Grand from the beach. These vehicles many times pull over into the current parking area and sometimes frighten the horses with their loud motors and roudy people. Again, safety is a huge concern for everyone.

GK-4

The space you are allotting for trailers is totally unreasonable. Just this morning, I was riding at The Woodlands which is right off Highway 1 and borders Nipomo. Many equestrians ride there. It was very prudent of the County to designate some space for the trailers to park at the entrance to the trailheads. However, again, whoever designed the parking spaces didn't consider the fact that when you have a horse trailer and truck, a certain amount of space is necessary to just pull into the designated space. Then you have to consider when you have the horses out of the trailer, tied to the sides of the trailer, there is another amount of space that is needed to SAFELY tie a horse not to interfere with the horse tied from the adjacent trailer. I am attaching 5 pictures that I took this morning to make my point. There is no way that it can be considered safe for either the horse or the rider to put these 1,000-plus pound animals on top of each other, especially when people and their horses have never ridden together and the horses have never seen each other. That is danger in the making and an accident waiting to happen.

GK-5

As you can clearly see, when you have a horse trailer and a truck pulling it, you need the length to fit both vehicles in a designated parking spot. Then you need at least the equivalent of 3 parking spaces between the rigs to safely tie up the horses and be able to even walk behind them. On top of that, you also need the turning radius to be able to turn your truck, pulling your trailer out of the space to exit.

Taking into account how many cars are already on Highway 1 and the amount of cars that go up and down Grand and Pier onto the beach, oftentimes pulling their giant trailers with 4-wheel vehicles, and now compounding the fact that there won't be a large enough space for equestrians to park their trucks and rigs SAFELY, I think there are going to be massive traffic jams and accidents created because of the fact you want to take up so much space for parking at a convention center/hotel facility that is not going

GK-6

to be utilized full time. I am sure you realize this is a vacation/retirement community. As a Realtor, I can assure you that the 5 Cities area is based a lot on tourism. While I believe you will get a lot of tourists and will book your convention center, I don't think it is fair that you disregard the needs and safety of the local equestrian community as we have supported this area for years.

**GK-7**

I suggest you designate the area equivalent to at least 30 spaces to accommodate at least 10 trucks and trailers in order to be able to SAFELY park, mount, dismount, reload and exit without accidents occurring.

**GK-8**

Thank you for your consideration.

Sincerely,

Gail Kemble

**Response to Letter from Gail Kemble, dated January 25, 2011**

Comment No.	Response
GK-1	The comment discusses the commenter's participation in various equestrian groups as well as the economic benefit derived by the City and San Luis Obispo County from equestrians. Please refer to Master Response EQ-11.
GK-2	The commenter states that there could be as many as 20-25 horse trailers parked in the dirt lot at the end of Grand Avenue. Please refer to Master Responses EQ-1 and EQ-2 above.
GK-3	The comment discusses the various sizes, capacities, and combinations of horse trailers that use the existing parking area. Please refer to Master Response EQ-3 related to design of the proposed equestrian parking area.
GK-4	This comment expresses safety concerns related to riding at the beach, but does not make substantive comments on the EIR or environmental analysis of the project. The City recognizes and commends the equestrian community's commitment to maintaining a safe environment.
GK-5	This comment discusses the spacing needed to safely accommodate horse trailer parking and staging. Please refer to Master Response EQ-3.
GK-6	<p>The comment states that the project would likely result in massive traffic jams. Project-specific and cumulative impacts related to transportation/traffic were analyzed in Section 4.8, Transportation/Traffic, of the EIR. The EIR recognized several traffic impacts that would result from the proposed project, including impacts along Highway 1 and Grand Avenue. Most of those impacts can be mitigated to less than significant levels through the implementation of recommended mitigation measures. However, impacts to two intersections in Pismo Beach were determined to be significant and unavoidable due to the infeasibility of mitigation at these locations. The City of Grover Beach does not have the authority to require improvements within the city limits of Pismo Beach. The City of Pismo Beach has indicated that they did not want to pursue improvements at these intersections at this time and Caltrans did not comment on the potential impacts to Pismo Beach intersections.</p> <p>For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (CEQA Guidelines §15093[a]). The proposed project will provide many benefits to the area, including increased beach access and amenities, improved utilization and revitalization of an important visitor-serving area located in the central core area of the City, increased social benefits through an enhanced beachfront experience, and an economic benefit derived from onsite concessions.</p>
GK-7	The commenter states that the tourist draw that would result from the proposed project should not come at the cost of disregarding local equestrians. Please refer to Master Responses EQ-1, EQ-2, EQ-4, and EQ-6.

Comment No.	Response
GK-8	<p>The commenter recommends providing sufficient space to accommodate at least 10 trailers with sufficient room to safely park, mount, dismount, reload, and exit without accidents. The project has proposed 10 to 15 equestrian parking spaces, and has left the specific design of the spaces undefined at this time to allow equestrian input and guidance in designing this area to best fit their needs. The project applicant is considering leaving the area un-striped, much like existing conditions, so that it could accommodate any number of situations.</p>

**MEMORANDUM TO FILE**

TO: Grover Beach Lodge & Conference Center, File No. 16706  
FROM: Emily Creel, Environmental Planner, SWCA Environmental Consultants  
DATE: January 25, 2011  
RE: Comments to Grover Beach Lodge DEIR

I received a phone call this afternoon, at approximately 3:00 p.m., from Doug LeSage. Mr. LeSage is the owner of the LeSage Mobilehome Park located adjacent to the proposed lodge site. He wanted to call and make the following verbal comments on the project:

1. He is opposed to the project.
2. He owns the mobilehome park and previously owned surrounding properties for many years (45 years). The project proposes access to the lodge along LeSage Drive. However, the section of the street between Highway 1 and the bridge crossing Meadow Creek is not a public street, but his private road. It has never been offered to the City, and the City has never accepted it for public use.
3. The City has been informed of this and he has provided them all the paperwork related to the road, but their "heads are elsewhere".
4. He is submitting formal comments through his attorney at Andre, Morris & Buttery, and would like a call to let him know that we received those comments as well.

**DLS-1**

**DLS-2**

**DLS-3**

Emily Creel

**Response to Phone Call from Doug Le Sage, dated January 25, 2011**

<b>Comment No.</b>	<b>Response</b>
DLS-1	This comment introduces the phone call received from the commenter, and his desire to make verbal comments on the project. The commenter states that he is opposed to the proposed project. The commenter's opposition is noted, but no specific substantive comments on the EIR are included, so no further response is necessary.
DLS-2	The comment states that the proposed accessway along Le Sage Drive is improper because this is a private road. State Parks was granted an easement across Le Sage Drive concurrently with the transfer of the project location property in a deed dated December 10, 1971. Please refer to the response to Comment No. LSE-1, below, for additional information.
DLS-3	The commenter advised that formal comments would be submitted through his attorney at Andre, Morris & Buttery. Such comments were received and have been addressed in Comment Nos. LSE-1 through LSE-22, below.

Backcountry Horsemen of California  
Los Padres Unit  
Post Office Box 6773  
Santa Maria CA 93456

January 26, 2011

Mary B. Reents  
SWCA Environment Consultant  
1422 Monterey Street, Ste C200  
San Luis Obispo CA 93401

Email: [mreents@swca.com](mailto:mreents@swca.com)

Dear Ms. Reents:

It has been brought to our members' attention that the City of Grover Beach and the State Park officials are planning a Lodge and Conference Center (LCC) at the corner of Grand and Highway 1. This complex will take both sides of the street from Highway 1 to the ocean. Some of members have expressed a concern about the Environment Impact Report. They have noticed that it reduces all parking and limits everyone's access to the beach.

The project does not show adequate horse parking, motor home parking, or parking for local citizens who wish to access the beach. This is a concern for many of our locals regarding the overall planning for this proposed project. Removing public State Park areas from public use will limit access to the beach. The EIR proposes parking for horses with very little room between rigs and will not allow for preparing our horses for a ride.

Since you are reducing all parking, the horse parking will more than likely be used for motor home parking, reducing the area for horse parking. The survey that was conducted was during hours when most horse people are already finished with their ride. Many horse riders ride early and finish early afternoon. Most of the days the survey was conducted were after the noon hour. Not a very accurate assessment of who uses the parking area. The City is not addressing the needs of the community when their idea of a survey is to check the parking lot from 12 noon to 4:00 p.m.

State Parks has allowed use of the project site for equestrian staging since 1982 when the previous facility near Oso Flaco Lake was closed. The community is losing the use of State Park Land.

I would hope some common sensibility would enable the governing bodies to realize our Central Coast Equestrian Groups' occasional use of this access facility, sometimes in low volume of approximately 5 – 10 truck and horse trailer rigs, on other occasions possibly 10 – 20 rigs, depending on economy feasibility. Our Central Coast is a high equestrian activity area. Please be responsible and address this concerned high use area. Overflow use will occur and should be provided for to accommodate our community interest of our spectacular Central Coast.

Bill Chaides – President of Los Padres Unit  
Backcountry Horsemen of California

**BHC-8**

**BHC-9**

**BHC-10**

**BHC-1**

**BHC-2**

**BHC-3**

**BHC-4**

**BHC-5**

**BHC-6**

**BHC-7**

**Response to Letter from Bill Chaides, Backcountry Horsemen of California, dated January 26, 2011**

Comment No.	Response
BHC-1	The comment describes the proposed project. As it makes no specific substantive comments on the EIR, no further response is necessary.
BHC-2	<p>The comment states that the project reduces all parking and limits everyone's access to the beach. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location consistent with LCP requirements. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p> <p>The project would also protect and enhance public access to the beach through added boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.</p> <p>Please refer to Master Response EQ-4, above, for additional information.</p>
BHC-3	This comment states that the project does not show adequate parking for equestrians, motor homes, or local citizens. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location consistent with LCP requirements. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
BHC-4	The comment states that removing public state park lands from public use will limit access to the beach. All 160 existing parking spaces will be retained in the proposed project design consistent with LCP requirements, and a separate parking area for equestrian users has also been proposed. The project would also protect and enhance public access to the beach through added boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.
BHC-5	This comment discusses the space needed between horse trailers to safely accommodate the horses and riders. Please refer to Master Response EQ-3 related to the design and safety of the proposed equestrian parking area.
BHC-6	This comment relates to motor homes utilizing the proposed equestrian parking. Please refer to Master Response EQ-10.
BHC-7	This comment relates to the adequacy of the equestrian parking survey in determining actual existing usage. Please refer to Master Response EQ-2.

Comment No.	Response
BHC-8	The comment states that equestrians have used this site for parking since the closure of Oso Flaco Lake to horses in 1982. Please refer to Master Responses EQ-4 and EQ-13.
BHC-9	The comment states equestrian usage is sometime five to 10 trailers, but can be between 10 and 20 rigs. Please refer to Master Responses EQ-1 and EQ-2 related to the amount of spaces proposed. Note also that the City and State Parks has taken considerable consideration in protecting equestrian use of this site, although no formal policy, provision or agreement has ever granted equestrians the formal right to utilize this area for parking.
BHC-10	<p>This comment concerns overflow use that would occur at the project site and states that this need should be accommodated. The project has included 160 public parking spots to retain existing formal parking at the site consistent with LCP requirements. The project also includes a separate equestrian parking area that is intended to replace the equestrian parking in the adjacent dirt lot as well as pull through parking within public and lodge lots to accommodate other oversized vehicles. However, the State Park parking survey (Appendix F of the EIR) found that non-equestrian vehicles use this lot for overflow parking, particularly on peak days and holidays. The survey identified as many as 23 vehicles in the lot over Labor Day weekend.</p> <p>Although State Parks has historically allowed parking in this area, no formal right to park has ever existed at this location. State Parks is under no obligation to provide, protect, or maintain parking at its current capacity at this location. The City and project applicant have taken considerable effort in preserving onsite parking.</p> <p>The EIR preparers recognize that this parking use may not entirely be preserved by the project, which has proposed approximately <del>37,000</del>21,000 square feet for trailer parking. However, this is not an impact that would rise to a level of significance under CEQA thresholds. Ultimately, this is a policy decision in which the City must balance potential adverse impacts against all beneficial aspects of the proposed project.</p>

**Emily Creel**

**From:** Mary Reents  
**Sent:** Wednesday, January 26, 2011 12:39 PM  
**To:** Emily Creel  
**Subject:** FW: Comment on development of conference center on park land

**From:** Kathleen Deragon [mailto:kathleen.deragon@sbcglobal.net]  
**Sent:** Wed 1/26/2011 12:36 PM  
**To:** Mary Reents  
**Subject:** Comment on development of conference center on park land

Mary B. Reents and Grover Beach city officials,

I am concerned that Grover Beach is planning to remove from public use state park land and lease it to a commercial developer in an area which is growing rapidly and needs more parking spaces not fewer.

**KD-1**

I am disturbed about using public park land to build a commercial resort. Private lands are for developers not park lands paid for by taxpayers.

I hope you will avoid the lure of tax moneys from this project and consider the long-term effect on the appearance and access to the beach for residents at that location. Please choose to use the land for more parking not a conference center.

**KD-2**

Sincerely,  
Kathleen Deragon  
Grover Beach resident

**Response to Email from Kathleen Deragon, dated January 26, 2011**

Comment No.	Response
KD-1	The comment concerns the removal of public state park land for commercial purposes. Please refer to Master Response EQ-6.
KD-2	<p>The comment recommends that the site be used for more parking rather than the proposed lodge and conference facilities. This comment does not make substantive comments on the environmental analysis in the EIR, but will be forwarded on the City for their consideration. The City is required to balance a large variety of public objectives in approving/permitting projects. The City will take this and other comments into consideration when making their decision on whether or not to approve this project. However, the desire to use the land for other purposes is not an issue that requires discussion under CEQA.</p> <p>The comment also concerns aesthetic impacts and beach access. Please refer to responses to Comment Nos. CCC-10 and Master Response EQ-4, above.</p>

**Emily Creel**

**From:** Mary Reents  
**Sent:** Thursday, January 27, 2011 9:15 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach parking and the Grover Beach Lodge Project

**From:** Carol Kennedy [mailto:kittykeno@att.net]  
**Sent:** Wed 1/26/2011 8:41 PM  
**To:** Mary Reents  
**Subject:** Grover Beach parking and the Grover Beach Lodge Project

Dear Ms. Reents,

I do not support the Grover Beach Lodge Project. I am very concerned about loosing the ability to park on the dirt lot behind Fin's. I have been coming to Grover Beach to ride my horse on that beautiful beach for nearly twenty years.

CK-1

It is not possible for me to drive my 2-wheel drive truck and trailer down the ramp and onto the sand. My rig is much too heavy and I fear getting stuck on the beach or not being able to get enough traction to even get back up the ramp.

CK-2

I want you to know that I am not a local....I live in Burbank and access the beach with my horse on a monthly to bi-monthly basis. I drive up there for the day, enjoy the beach and take a lunch at Fin's. It's the most enjoyable thing to be able to do this. Without parking available to horsemen at Grover Beach my access to beach riding will be null and void. The only other parks that allow beach riding are in Northern California....a distance much too great for me to travel to and fro in one day.

CK-3

I really have a hard time wrapping my head around the plan to build a hotel/conference center at this location. It seems that so much of the natural beauty of CA is constantly being destroyed. I object to this proposal.

CK-4

Thank you for listening.

Sincerely,

Carol Kennedy, Burbank, CA

**Response to Email from Carol Kennedy, dated January 26, 2011**

Comment No.	Response
CK-1	The comment concerns the loss of equestrian parking in the dirt lot. Please refer to Master Response EQ-1.
CK-2	The commenter states that it is not possible to park on the sandy beach because of the trailer weight and traction concerns. The inability of some equestrian trailers to park on the beach is noted. The comment does not make specific substantive comments on the EIR; no further response is necessary.
CK-3	The commenter expresses concern that the ability to ride on the beach will be lost due to the inability to park. Please refer to Master Responses EQ-1 and EQ-2 related to the number of spaces needed and being proposed.
CK-4	The comment states that a hotel/conference center is not appropriate for this location. This location is a significant component of the City's visitor-serving downtown/beachfront area, and a vital component of the City's goal to revitalize this area and provide connectivity to adjacent shops, restaurants, and other concessions. The site is currently being underutilized and would be improved through site design and improvement of visitor-serving beach amenities. Please refer to the response to Comment No. CCC-10 above, as well as Master Response EQ-6.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
C/O Mary B.Reents SWCA Environmental Consultants

1/27/11

RE: Equestrienne Parking

Dear Sir:

The proposed parking is of course no solution whatsoever. It does appear to be a hastily drafted halfhearted stab at placating some people while giving the developers the final say. Once that piece of property is gone it will never come back; much as our famous clams and the snowy plover.

MJA-1

MJA-2

This matter is clearly not ready for resolution and the hasty push towards a haphazard solution smacks of yet another land give away. The equestrienne community represents the "quiet users" of the area; the nature watchers/walkers/animal lovers who support this community in a steady and solid manner. We don't have the flash and noise of the gas/wheel community who use the beach but we are just as important. I have been riding and walking on this beach for over twenty years. I am a member of this community since 1988 and a previous resident of Grover Beach.

MJA-3

I believe the current plan could destroy a part of this community that gives intangible values and is part of the draw from all over the country to our beautiful coast. As we all say, "We live in paradise". Why are you in such a hurry to destroy yet another piece of our community and give in to "development" at any price?

MJA-4

What is the big hurry? As my grandmother used to say. "Marry in haste, repent in leisure". Once you give this piece away—it is gone forever. I think you need to take more time; look for better alternatives and consider the future; not the immediate present. Your current plan will eventually force riders off the beach. Is that the plan? One hopes not.

MJA-5

MJA-6

Respectfully,

  
Mary Jane Alumbaugh, Ph.D.

1216 Huasna Road

Arroyo Grande, Ca 93420

805-441-4124

831-427-4877

c/c M. Cabralles

mreents@swca.com

**Response to Letter from Mary Jane Alumbaugh, dated January 27, 2011**

Comment No.	Response
MJA-1	The comment states that the proposed parking is no solution, and constitutes a halfhearted stab at placating some people while allowing the developer the final say on parking in the area. The comment makes no specific substantive comments on the EIR or environmental analysis and no further response is necessary.
MJA-2	The comment references the snowy plover and Pismo clams, and states that once the property is gone it will never come back. The proposed project does not result in the take or removal of any land. The current site is being underutilized and is a significant component to the City's downtown/beachfront visitor-serving area. Project design and revitalization of the onsite recreational amenities will improve beach access and recreational activities at the site.
MJA-3	The comment states that the project is not ready for resolution and has been hastily pushed towards a haphazard solution. However, according to relevant City and Coastal Commission documents, a lodge and conference facility has been planned at this location since the early 1980s.  The comment also provides a background on the quiet equestrian users of this site. The EIR has recognized their use, and equestrian uses are the only recreational use singled out for specific attention in the EIR. Please refer to Master Responses EQ-1 and EQ-4.
MJA-4	This comment questions the purported decision to destroy a piece of the community and give in to development. CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian (CEQA Guidelines §15021(d)). Nevertheless, potential impacts on a particular recreational use at a particular location as a result of a proposed project do not fall within the CEQA framework. This impact is not necessarily one that impacts the physical environment, which is what CEQA is intended to protect. This issue is a policy issue, whereby the City must consider balancing this interest with all others at issue in considering and/or planning the development of this project.  This comment has been forwarded to the City for their consideration. Refer also to Master Response EQ-6, related to the leasing of State Park lands to a commercial developer.
MJA-5	This comment recommends delaying development of this property and considers the project a land giveaway. As stated above, this development of a lodge facility at this location has been discussed for approximately 30 years. The project does not "giveaway" any property. It serves to better utilize this property, which has remained underutilized and vacant despite its importance to Grover Beach's downtown/beachfront visitor-serving area. Refer also to Master Response EQ-6, above, related to the leasing of State Park lands to a commercial developer.
MJA-6	The comment states that the project will eventually force riders off the beach. Please refer to Master Response EQ-1 and EQ-4.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:20 PM  
**To:** Emily Creel  
**Subject:** FW: Response to Grover Beach Lodge and Conference Center Draft Environmental Impact Report

**From:** Leeann Bettencourt [mailto:leeannbettencourt@yahoo.com]  
**Sent:** Thu 1/27/2011 2:58 PM  
**To:** Mary Reents  
**Subject:** Response to Grover Beach Lodge and Conference Center Draft Environmental Impact Report

Good Afternoon,

I am writing in response to the Grover Beach Lodge and Conference Center Environmental Impact report. As a resident of the central coast for the last 7 years I have truly enjoyed and taken advantage of the equestrian beach access at Pismo Beach. Not only is it a gorgeous setting, but it is a great place to take my horses year around to keep them in shape.

I am very concerned with the proposed 5 spaces reserved for trailer parking. Several times I have pulled in the current parking lot and found up to 10 trailers of various sizes in the lot with multiple horse each. Not only is it important to plan for adequate trailer space, but the horse's and rider's safety must also be kept in mind. Horse trailers are designed for the horses to be tied to the sides, plenty of space must be provided in order for the rider to safely saddle their horses.

I hope you will consider my concerns, as I truly treasure the time I have spent riding my horses on the beach. Everyone should have accessibility to this and I hope we will all have convenient and safe access for many years to come.

Sincerely,  
Leeann Bettencourt  
Arroyo Grande, CA

LB-1

LB-2

LB-3

LB-4

**Response to Email from Leann Bettencourt, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
LB-1	The commenter provides a history of her equestrian use of the location. As the comment does not contain substantive comments or questions related to the EIR, no further response is necessary.
LB-2	The comment relates to the adequacy of five equestrian parking spaces. Please refer to Master Response EQ-5.
LB-3	This comment states that plenty of space is needed to tie horses to the sides of trailers. Please refer to Master Response EQ-3.
LB-4	The comment concerns the preservation of convenient and safe access to the beach. Please refer to Master Responses EQ-1, EQ-2, EQ-3, and EQ-4.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **in Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

MMB-1

MMB-2

MMB-3

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

MMB-4

Sincerely,

Marney Montgomery Briggs

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

**Response to Letter from Marney Montgomery Briggs, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
MMB-1	This comment discusses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
MMB-2	This comment relates to the re-alignment of Grand Avenue alternative. Please refer to Master Response EQ-8.
MMB-3	This comment discusses a suggested alternative brought forward by equestrians north of the ranger station along Highway 1. Please refer to Master Response EQ-9.
MMB-4	The comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:21 PM  
**To:** Emily Creel  
**Subject:** FW: Horse trailer parking spaces at Grover Beach ramp

**From:** Patti Chambers [mailto:patt0555@sbcglobal.net]  
**Sent:** Thu 1/27/2011 12:08 PM  
**To:** Mary Reents  
**Subject:** Horse trailer parking spaces at Grover Beach ramp

I am writing in response to the area designated for horse trailer parking at the newly proposed event center to be located at the Grover Beach ramp. I am VERY concerned the area will be inadequate at best, and will inhibit my ability to access the beach for riding--which I dearly love and cherish!!! There is no other safe alternative-- Oceano ramp is too busy and too dangerous. The parking lot needs to be large enough to safely load and unload our horses with safe distance in between each other, just like we have had for as long as I can remember!!! I am a long-time resident--55 years and counting and can't imagine the pleasure of trailering to the beach for a wonderful ride being taken away. Then replacing it with a HUMONGOUS event center for out-of-towners is just insult to injury. This is being done by the City of Grover Beach to it's local tax payers!! I implore you to reconsider this project which does NOT reflect the local flavor and environment it is going to so greatly impact--NEGATIVELY!!!! It is too large of a structure and is going to spoil the town. Please take our pleas seriously and take time to RECONSIDER. Thank You, Patti Chambers

PC-1  
PC-2  
PC-3  
PC-4

**Response to Email from Patti Chambers, dated January 27, 2011**

Comment No.	Response
PC-1	This comment states that horse trailer parking is inadequate and will inhibit equestrians' ability to access the beach for riding. Please refer to Master Responses EQ-1, EQ-2, and EQ-4.
PC-2	The comment discusses the need for a safe amount of space between vehicles to accommodate horses, riders and other vehicles. Please refer to Master Response EQ-3.
PC-3	<p>This comment challenges the replacement of long-established equestrian parking with a "humongous event center." CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian (CEQA Guidelines §15021(d)). Nevertheless, potential impacts on a particular recreational use at a particular location as a result of a proposed project do not fall within the CEQA framework. This impact is not necessarily one that impacts the physical environment, which is what CEQA is intended to protect. This issue is a policy issue, whereby the City must consider balancing this interest with all others at issue in considering and/or planning the development of this project.</p> <p>This comment has been forwarded to the City for their consideration.</p>
PC-4	This comment states that the project is too large of a structure for this location. Please refer to the response to Comment No. CCC-10.

Mr. Bruce Buckingham  
 Community Development Director  
 City of Grover Beach  
 c/o Mary B. Reents, SWCA Environmental Consultants  
 1422 Monterey Street, Suite C200  
 San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center – second letter

Dear Mr. Buckingham;

I have again reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **in Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

ARD-4

Sincerely,

Anne R. Dunbar

Member Ride Nipomo  
 805-441-7391  
 898 S. Halcyon Road, AG, Ca 93420

ARD-1

ARD-2

ARD-3

**Response to Letter from Anne R Dunbar, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
ARD-1	This comment discusses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
ARD-2	This comment relates to the re-alignment of Grand Avenue alternative. Please refer to Master Response EQ-8.
ARD-3	This comment discusses a suggested alternative brought forward by equestrians north of the ranger station along Highway 1. Please refer to Master Response EQ-9.
ARD-4	The comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2.

Emily Creel

Subject: FW: Protest current plan to limit Grover Beach Equestrian Parking

From: CJ Foglietta [mailto:cfoglietta@yahoo.com]  
Sent: Thu 1/27/2011 9:47 PM  
To: Mary Reents  
Subject: Protest current plan to limit Grover Beach Equestrian Parking

A letter dated September 15, 2010 from the Coastal Commission to the redevelopment Coordinator, Bruce Buckingham (of Grover Beach) states very clearly that the Coastal Commission WILL NOT consider disturbing the dunes south of Grand Avenue. **This is the project's First Choice to relocate us to** (See below)

CJF(b)-1

Deah wrote: In reading the following in the letter to Mr. Buckingham dated September 15, 2010, from the Coastal Commission, and in particular, page 2 paragraph 3:

**"Biological Resources:** GB-"The proposed horse trailer parking and staging area would be located south of Grand Avenue in vegetated dune habitat." CC- **Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area. The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives."**

**By the Way-**

Grand Avenue was re-paved Grand from Hwy 1 to the Ramp 1/25/11.

CJF(b)-2

This proposal to realign Grand ave. was not evaluated in the DEIR or mentioned to us at the Advisory Committee meeting we had on the 19h of January. It was also not brought up in the public meetings by the City or the State.

CJF(b)-3

I am demanding to know why this was not included in the alternatives for Equestrian parking.???

**Response to Email from CJ Foglietta, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
CJF(b)-1	This comment addresses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
CJF(b)-2	The comment points out that Grand Avenue was recently re-paved. No further response is necessary.
CJF(b)-3	This comment relates to the re-alignment of Grand Avenue alternative. Please refer to Master Response EQ-8.



Jim Suty, President  
 15131 GarcaI Drive  
 San Jose, CA 95127  
 408-242-4445  
 E-mail: [jim@oceanodunes.org](mailto:jim@oceanodunes.org)  
[www.oceanodunes.org](http://www.oceanodunes.org)

January 27, 2011

City of Grover Beach  
 c/o Mary Reents  
 SWCA Environmental Consultants  
 1422 Monterey Street, Suite C200  
 San Luis Obispo, CA 93401

Subject: Response to the Grover Beach Lodge & Conference Center Draft Environmental Impact Report (DEIR).

Dear Ms. Reents,

FRIENDS OF OCEANO DUNES, INC. ("FRIENDS"), is a California not-for-profit corporation representing approximately 28,000 members and users of Oceano Dunes State Vehicular Recreation Area ("Oceano Dunes SVRA") located near Pismo Beach, California. According to its Articles of Incorporation, FRIENDS is formed for the express purpose of preserving and developing recreational uses in the Oceano Dunes area of San Luis Obispo County, California.

FOD-1

The FRIENDS Board of Directors has three main concerns about the proposed Grover Beach Lodge & Conference Center Draft Environmental Impact Report (DEIR).

1. Currently the proposed site encompasses a large open area used for equestrians and visitors to the Oceano Dunes SVRA. This area is a popular stopping point used by many of the FRIENDS members as a convenient and safe location to park their large RV's as they enter and exit the park for airing down tires, transferring vehicles and eating at the Fin's restaurant. This is the only open and safe location for these large RV's to stop and air down their tires without impeding traffic.

FOD-2

The new proposed location is not large enough to accommodate numerous

vehicles, or have the ability for RVs to turn around, disconnect trailers or enter and exit easily with tires aired down.

FOD-2  
(cont'd)

Without this location, large RV's will be required to stop and air down on the beach or public roads causing traffic congestion and safety concerns. We think this issue requires additional discussion.

2. Relocation of the RV sewer dump station will require the large RV's to travel down Highway 1 towards town causing more congestion and at times long lines can form. It would also improperly encourage these large RV's to drive through the very narrow streets of Pismo on their way towards Highway 1, as opposed to up Grand Avenue to 4<sup>th</sup> street.

FOD-3

FOD-4

Many business owners might think more traffic is good, but there is no parking available for the large RV's, therefore they will merely be driving through the small congested town. FRIENDS believes this added congestion will raise frustration of the local citizens, store owners and increase safety problems.

FOD-5

FRIENDS believes more discussion should occur and would like to see the new equestrian area South of Grand to be expanded to allow more parking area for RV's as well as a large RV dump station. This would accommodate all concerns and limit traffic congestion in the down town area.

FOD-6

3. FRIENDS is concerned that construction efforts might limit access to the Oceano Dunes or force more traffic through the town of Oceano. Currently the town of Oceano has had many vocal residents expressing concerns about traffic and congestion, therefore redirecting more traffic through Oceano would exacerbate the problem.

FOD-7

In conclusion, FRIENDS is concerned that this large development will have direct impacts to the recreational aspects of the park. FRIENDS thinks it is time for a long term strategy to improve beach access, provide RV parking areas, areas for airing down tires, provide the equestrian community with facilities for parking and enjoyment of the beach and dunes.

FOD-8

The Public Resources Code (5003.021.) for this development project was clear:

FOD-9

"(3) The development will not impact the resources or the public's use of the state park."

Friends of Oceano Dunes is a 501(c)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 28,000 supporters. We represent businesses, environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

Friends of Oceano Dunes is a 501(c)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 28,000 supporters. We represent businesses, environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

Unfortunately, we feel the development, as written, is having a direct negative impact on the public's use of the park.

FOD-9 (cont'd)

Sincerely,



Jim Suty  
President – Friends of Oceano Dunes

OHV Representative on the Oceano Dunes  
SVRA Technical Review Team

CC: Tom Roth  
FoOD BOD

---

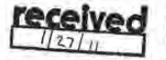
Friends of Oceano Dunes is a 501(c)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 28,000 supporters. We represent businesses, environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

**Response to Letter from Friends of the Oceano Dunes, dated January 27, 2011**

Comment No.	Response
FOD-1	This comment introduces the Friends of Oceano Dunes organization and its comments on the proposed project. No further response is necessary.
FOD-2	<p>This comment addresses the need for a large area for RVs to stop as they enter and exit the park. Several portions of the main public and lodge parking areas have been designed to allow large RVs, motor homes and other oversized vehicles room to pull through two spaces and park. All 160 existing parking spaces have been retained by project design consistent with LCP requirements.</p> <p>The ultimate design and layout of the project lies with the decision of the City in consultation with State Parks. No significant environmental impacts associated with RV parking were identified. This comment has been forwarded to the City for its consideration.</p>
FOD-3	<p>This comment addresses traffic impacts associated with relocation of the RV sewer dump station. Project-specific and cumulative impacts related to transportation/traffic were analyzed in Section 4.8, Transportation/Traffic, of the EIR. The EIR recognized several traffic impacts that would result from the proposed project, including impacts along Highway 1, Grand Avenue and several Pismo Beach intersections. Most of those impacts can be mitigated to less than significant levels through the implementation of recommended mitigation measures. However, impacts to several intersections in Pismo Beach were determined to be significant and unavoidable due to the infeasibility of mitigation at these locations. The City of Grover Beach does not have the authority to require improvements within the city limits of Pismo Beach and the City of Pismo Beach has indicated that they did not want to pursue improvements at these intersections at this time. Both the City of Pismo Beach and Caltrans declined to comment on this issue.</p> <p>For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (CEQA Guidelines §15093[a]). The proposed project will provide many benefits to the area, including increased beach access and amenities, improved utilization and revitalization of an important visitor-serving area located in the central core area of the City, increased social benefits through an enhanced beachfront experience, and an economic benefit derived from onsite concessions.</p> <p>This comment has been forwarded to the City for its consideration.</p>
FOD-4	Refer to the response to Comment No. FOD-3, above.
FOD-5	Refer to the response to Comment No. FOD-3, above.
FOD-6	This comment recommends an expanded equestrian parking area to accommodate RVs and a large RV dump station. The EIR evaluated impacts associated with development in the dune area south of Grand Avenue and determined that impacts to biological resources would occur. The EIR recommended in the environmentally superior alternative that the equestrian parking be relocated north of Grand Avenue within the main parking area. Several portions of the main public parking area have been designed to allow large RVs and motor homes room to pull

Comment No.	Response
	<p>through two spaces and park.</p> <p>The ultimate design and layout of the project lies with the decision of the City in consultation with State Parks. No significant environmental impacts associated with RV parking were identified. This comment has been forwarded to the City for its consideration.</p>
FOD-7	<p>The comment relates to potential short-term traffic impacts associated with construction of the proposed project. Short-term construction impacts generally do not rise to a level of significant under CEQA due to their limited nature. Construction activities will be subject to standard Caltrans and City measures to mitigate any potential impacts to the extent feasible.</p>
FOD-8	<p>The comment recommends development of a long-term strategy to improve beach access parking and public facilities. The project would protect and enhance public access to the beach and dunes through added boardwalks and paths throughout the site, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property. RV and equestrian parking has been retained at levels that are considered by the EIR preparers to be sufficient for average usage.</p>
FOD-9	<p>This comment refers to the Public Resources Code (5003.02.1) and states that the development would have a negative impact on the public's use of the park. The legislature, in this statute, found and declared that the development <i>would not</i> impact the resources or the public's use of the state park and that the land proposed to be developed was suitable for commercial development. The EIR concluded that recreational resources would be protected.</p> <p>Please also refer to Master Response EQ-4.</p>

City of Grover Beach  
Re: Staging Area - Horse Trailer Parking -  
Grand Avenue -  
January 27, 2011



Respectfully request the Draft EIR evaluate as an option and analyze alternatives for the Horse Trailer Parking/Staging area, specifically "the suggested area, off-site, in Grand Avenue right-of-way with realignment of street, etc." and/or other feasible alternatives that need to be discussed also.

SG-1

The fact that the Coastal Commission would not allow the Horse Parking/Staging area in the dunes was specifically mentioned at the two recent meetings and still all emphasis was directed to the known, unallowed dunes area.

SG-2

The proposed project does not respect the HorseParking/Staging area because it immediately placed it into the dunes, knowing full well the Coastal Commission would not allow it; and it is of no consequence to the proposed project as their only goal is building (as the Coastal Commission stated in its 9-15-2010 letter) a bulky, massive project already known to be detrimental and inconsistent to the Coastal Commission. A known builder method is to "ask for the moon and take what the Coastal Commission allows" and in this case, "the heck with the Horse Trailer/Staging area."

SG-3

The proposed mega structure project is simply a step in the "LosAngelesization" of wonderful Grover Beach... a step in the wrong direction.

SG-4

Respectfully requesting Grover Beach to protect its established Horse Trailer/Staging history for the future with a proper option(s) evaluation.

SG-5

Sincerely,  
*Stephanie Greene*  
STEPHANIE GREENE, California Mounted Assistance  
1075 Cheyenne Court  
Nipomo, CA 93444  
realvoiceoftwh@aol.com

**Response to Letter from Stephanie Greene, dated January 27, 2011**

Comment No.	Response
SG-1	This comment relates to the re-alignment of Grand Avenue alternative. Please refer to Master Response EQ-8.
SG-2	This comment discusses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
SG-3	The comment states that the only goal is building a bulky, massive project and that no regard has been taken in respect to the equestrian parking area. Please refer to Master Responses EQ-1, EQ-7, EQ-12, and EQ-13.
SG-4	<p>The comment states that the project is a step towards “LosAngelezation” of the area. CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian (CEQA Guidelines §15021(d)). Nevertheless, potential impacts on a particular sport at a particular location as a result of a proposed project do not fall within the CEQA framework. This impact is not necessarily one that impacts the physical environment, which is what CEQA is intended to protect. This issue is more of a planning issue, whereby the City is forced to balance this interest with all others at issue in considering and/or planning the development of this project.</p> <p>This comment has been forwarded to the City for their consideration.</p>
SG-5	The comment requests protection of historical equestrian uses at this site and discussion of proper options. Please refer to Master Responses EQ-1, EQ-2, EQ-4, EQ-7, EQ-8, and EQ-9.

Mr. Bruce Buckingham  
 Community Development Director  
 City of Grover Beach  
 c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
 1422 Monterey Street, Suite C200  
 San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **In Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

1

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

MG-4

Sincerely,

Marcia Guthrie  
 112 Frances Way  
 Pismo Beach, CA 93449  
 (805) 709-0500

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
 FAX (831) 427-4877

MG-1

MG-2

MG-3

2

**Response to Letter from Marcia Guthrie, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
MG-1	This comment discusses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
MG-2	This comment relates to the re-alignment of Grand Avenue alternative. Please refer to Master Response EQ-8.
MG-3	This comment discusses a suggested alternative brought forward by equestrians north of the ranger station along Highway 1. Please refer to Master Response EQ-9.
MG-4	The comment challenges the adequacy of the equestrian parking survey. Please refer to Master Response EQ-2.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:30 PM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Parking

**From:** Hans & El-Jay Hansson [mailto:hansson@verizon.net]  
**Sent:** Thu 1/27/2011 11:17 AM  
**To:** Mary Reents  
**Subject:** Fw: Grover Beach Parking

EL-JAY HANSSON AND FAMILY  
 2315 Idyllwild Place  
 Arroyo Grande, California 93420  
 805/343-1949

January 27th, 2011

Mr. Bruce Buckingham  
 Community Development Director  
 City of Grover Beach  
 c/o Mary B. Reents  
 SWCA Environmental Consultants  
 1422 Monterey Street C200  
 San Luis Obispo, Ca. 93401

Reference: Proposed Convention Center EIR

Gentlemen:

In addition to our previous letter we have learned more information which must be evaluated prior to any approvals.

**Biological Resources 2.1.5.A - What we understand is that this would not allow an equestrian staging area in the proposed area. Is this correct? If so what is the developer talking about?**

**Also the following remarks from the Coastal Commission must be addressed.**

1. The proposed project does not respect the site and the surrounding environment.
2. The proposed project size, scale, and scope of the project far exceeds what is envisioned and allowed by the Coastal Act certified LCP,
3. The proposed project height, bulk and overall massing will have detrimental impact on public views from Highway 1, Grand Avenue looking north, from the ocean looking east, golf

courers and campers to the north looking south and east, and from Grover Heights looking towards the ocean.

4. Move the buildings farther away from the beach and the primary viewsheds because of their sensitive nature

5. That the size and mass of the project will substantially degrade the existing local natural visual character and quality of the site and its surroundings.

5. The buildings do not blend with the natural environment.

6. The project is too large scale for the site and does not work well to bring the dunes and the natural environment into the site.

8. That the project will substantially alters the defining visual character of the surrounding area and the height, scale, and bulk overwhelms the site.

Sincerely

El-Jay Hansson

EJH(b)-4  
(cont'd)

EJH(b)-5

EJH(b)-6

EJH(b)-7

EJH(b)-8

EJH(b)-9

EJH(b)-1

EJH(b)-2

EJH(b)-3

EJH(b)-4

**Response to Email from El-Jay Hansson, dated January 27, 2011**

Comment No.	Response
EJH(b)-1	This comment discusses communications by the Coastal Commission that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
EJH(b)-2	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-3	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-4	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-5	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-6	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-7	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-8	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
EJH(b)-9	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.

**Emily Creel**

---

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:20 PM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Equestrian Parking

---

**From:** Diane Kastama [mailto:dkastama@verizon.net]  
**Sent:** Thu 1/27/2011 4:25 PM  
**To:** Mary Reents  
**Subject:** Grover Beach Equestrian Parking

It has come to my attention that the proposed location of the Grover Beach Equestrian Parking area south of Grand will not be approved by the Coastal Commission. If so why have we had all these meetings about a place that won't ever get approved. The Equestrian Parking area needs to be located to allow access to the beach. I am a frequent user of the beach with my horses, I drive them with a carriage I am paralyzed and in a wheelchair and this is the way I can enjoy our beaches is with my horses. This can not possibly be taken away from the equestrians.

DK-1

DK-2

Feel free to contact me.  
Diane Kastama  
[dkastama@verizon.net](mailto:dkastama@verizon.net)  
805-343-6026

**Response to Email from Diane Kastama, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
DK-1	This comment discusses communications by Coastal Commission staff that no development in the dunes south of Grand Avenue would be allowed. Please refer to Master Response EQ-7.
DK-2	The commenter states that she is paralyzed and needs parking capable of accommodating her continued use of the beach for riding. Please refer to Master Response EQ-3 and the response to Comment No. CD-5, above.

*John Paul Krueger*

Chapter 8--Designing Roads and Parking Areas, Equestrian Design Guidebook for Trails, Trailheads and C... Page 1 of 15

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Federal Highway Administration

Environment

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FOREST SERVICE  
TECHNOLOGY &  
DEVELOPMENT  
PROGRAM

## Equestrian Design Guidebook for Trails, Trailheads and Campgrounds

### Chapter 8--Designing Roads and Parking Areas

Proper road and parking area design is critical in recreation sites, especially for vehicles towing trailers. Traffic circulation should be simple, functional, and avoid dead ends.

#### Road System Design

Designing roads is a complex process that is beyond the scope of this guidebook. Road geometry and components, including turning radii, sight distances, horizontal and vertical alignments, and intersections, must conform to AASHTO requirements and any other applicable standards. Consult with a qualified transportation engineer. Designers need to know not only engineering essentials, but also basic equestrian needs when designing recreation site roads.

#### Recreation Site Entrances

The access to most recreation sites is from a State or county highway. Any work performed within the rights-of-way of Federal, State, or county roads requires applicable permits. The road agencies also may require acceleration, deceleration, or turning lanes. During design, carefully analyze the location of intersections. Use only one site entrance to minimize conflicts with highway traffic. One entrance also simplifies incoming traffic flow and makes site management easier. Safe exits avoid steep grades and have adequate clear sight distance for approaches and departures. Vehicles towing heavy horse trailers need a lot of time to merge with highway traffic, so make sure merge lanes are long enough.

Avoid locating intersections on sharp curves or at areas with awkward grade combinations. Carry the grade of the main road through the intersection and adjust the grade of the access road to it. The grade of the access road should be 6 percent or less where it approaches the main road. A maximum grade of 5 percent at intersections allows vehicles pulling horse trailers to accelerate more quickly so they can merge safely into highway traffic. The preferred grade is 1 to 2 percent.

For roads where snow and ice may create poor driving conditions, AASHTO (2001a) lists the preferred grade on the approach leg as 0.5 percent to no more than 2 percent, as practical. Avoid intersections that are slightly offset from each other on opposite sides of the main road. More than two roads intersecting at one location may cause traffic management problems.

#### Design Vehicles

Road design is based on vehicle dimensions and operating characteristics. Transportation engineers must know which design vehicle is used at the site. In an equestrian recreation site, this is a passenger vehicle—a pickup truck—pulling a horse trailer. The standard design length for passenger vehicles is 19 feet (5.8 meters). Newer model pickup trucks range from about 15 feet (4.6 meters) long for a standard pickup to about 22.5 feet (6.8 meters) long for a pickup with an extended cab and long bed. Common horse trailers vary from 16 feet (4.9 meters) long for a two-horse, bumper-pull trailer, to about 49 feet (15 meters) long for a six-horse, gooseneck trailer with living quarters. Roads also may need to accommodate 32- to 46.5-foot (9.7- to 14.2-meter) motorhomes towing horse trailers. If a commercial waste management company services a facility, garbage trucks may be traveling through the site. Visit with the land management agency to determine the size of the expected vehicles and whether the site needs to accommodate maintenance equipment. The *Parking Area Layout* section in this chapter has more information on lengths of common vehicles and stand-load trailers.

Some turning radii guidelines are summarized in [table 8-1](#). Tight curves may have to be widened more than indicated—consult current AASHTO requirements for exact figures.

Table 8-1—Turning radii of some common design vehicles, rounded to the nearest 6 inches.

Vehicle type	Minimum inside turning radius (feet)	Minimum outside turning radius (feet)
Passenger vehicle with trailer 19-foot vehicle plus 30 feet total trailer length (including tongue)- 49 feet combined length	17.5	34.5

<http://www.fhwa.dot.gov/environment/fmhwa/07222816/page14.htm>

1/19/2011

Chapter 8--Designing Roads and Parking Areas, Equestrian Design Guidebook for Trails, Trailheads and C... Page 2 of 15

Motorhome with trailer 30-foot vehicle plus 23 feet total trailer length (including tongue)- 53 feet combined length	35	51.5
Garbage truck** Gross vehicle weight (GVW) 20,000 pounds with 25-foot 5-inch wheelbase	21	33.5

\* A Policy on Geometric Design of Highways and Streets (AASHTO 2001)  
\*\* Architectural Graphic Standards (American Institute of Architects 2000).

PK(b)-1

PK(b)-1

**Trail Talk**

**Forest Lanes**

The number of constructed lanes appropriate for recreation site roads depends on safety concerns and the amount of traffic. Forest Service recreation site roads generally are narrow enough to minimize landscape impacts but wide enough for safe travel at up to 30 miles per hour (48.2 kilometers per hour).

The Forest Service requires single-lane roads to be at least 10 feet (3 meters) wide if they serve passenger vehicles moving no faster than 25 miles per hour (40.2 kilometers per hour). Riders often drive pickup trucks or motorhomes towing horse trailers. Because these vehicles require more maneuvering space than passenger vehicles, many Forest Service recreation site roads are wider than 10 feet (3 meters). Single-lane recreation site roads are often 12 feet (3.6 meters) wide, and double-lane recreation site roads are often 24 feet (7.3 meters) wide ([figure 8-1](#)). Shoulder width depends on available space—1 to 2 feet (0.3 to 0.6 meters) usually is adequate. Curves need to be widened on single-lane roads to accommodate trailers. In most cases, single-lane roads are constructed no wider than 14 feet (4.3 meters). If they are wider, drivers may mistake them for narrow two-lane roads.

In a few situations, two-way traffic may be routed along a single-lane recreation site road. Appropriate situations include recreation sites where traffic volume is very low, where the distance is short, or where minimal environmental impact is desired. When routing two-way traffic along a single-lane road, the Forest Service constructs turnouts. The dimensions and locations of turnouts must follow established guidelines. Chapter 4 of the Road Preconstruction Handbook FSH 7709.56 (U.S. Department of Agriculture Forest Service 1987) has more information on Forest Service design and standards. The handbook is available at [http://www.fs.fed.us/gai-bin/Directives/net\\_dirs/fsh7709.56](http://www.fs.fed.us/gai-bin/Directives/net_dirs/fsh7709.56).

Recreation roads on public lands are subject to the AASHTO guidelines for local roads with very low traffic volume. On low-volume two-lane roads where the maximum speed is 30 miles per hour (48.3 kilometers per hour), AASHTO (2001b) recommends a width of 18 feet (5.5 meters). Single-lane roads with two-way traffic often range from 11.5 to 13 feet (3.5 to 4 meters) wide.

<http://www.fhwa.dot.gov/environment/fmhwa/07222816/page14.htm>

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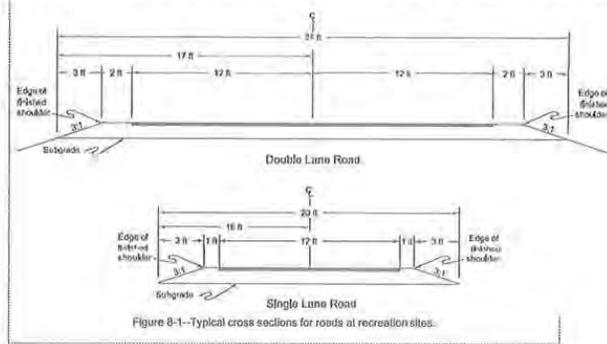


Figure 8-1--Typical cross sections for roads at recreation sites.

**Road Alignment**

Minimize landscape alterations by allowing recreation site roads to complement the site's natural landforms. Visitors prefer curves to long straight stretches when they are driving through a recreation site. However, roads with curves must provide adequate stopping sight distance. Where feasible, roads should follow the contour, avoiding areas of steep terrain. Try not to disturb appealing vegetation or significant natural features. In some places, new road alignments can take advantage of abandoned roads.

Single-lane, one-way loop roads are best for single-party campgrounds or group sites with individual camp units. Loop roads make it easy for visitors to get oriented. Managers like loops because they can be closed as needed. Fit the loops between landforms, dense stands of vegetation, streams, or drainages. These barriers will screen noise and provide privacy. Reduce road and trail duplication by aligning loop roads so they lead to site attractions, such as trail access points or a lake (figure 8-2). Field experience shows that to provide an adequate buffer for camp units, the loop road should enclose an area that is at least 300 feet (91.4 meters) across. If vegetation is sparse, allow more distance between the roads.

In areas with restricted space, consider incorporating a double-lane road with a loop turnaround—a *cul-de-sac*—at the end (figure 8-3). Make sure the cul-de-sac's turning radius accommodates the expected sizes of vehicles. Unless the cul-de-sac is large enough, avoid locating parking pads on the turnaround, because it is difficult to maneuver vehicles with trailers in and out of such areas. An oval-shaped cul-de-sac accommodates parking pads well. Consult Chapter 9—Designing Camp and Picnic Units for more information on parking pads. Another concept suitable for tight spaces is shown in figure 8-4.

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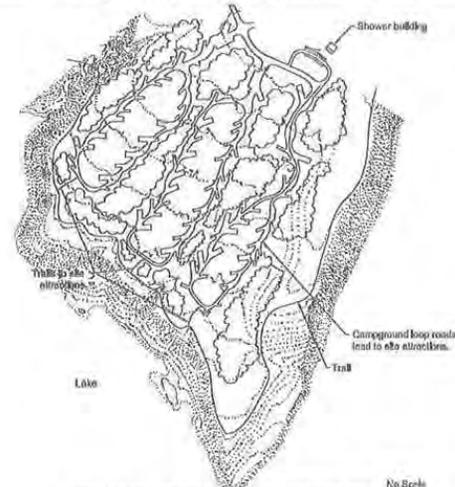


Figure 8-2--Loop roads lead to the lake. The campground loop roads fit between existing vegetation and drainages.

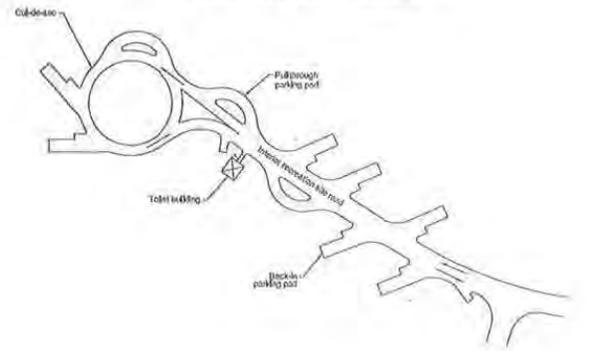


Figure 8-3--This cul-de-sac is large enough to accommodate parking pads.

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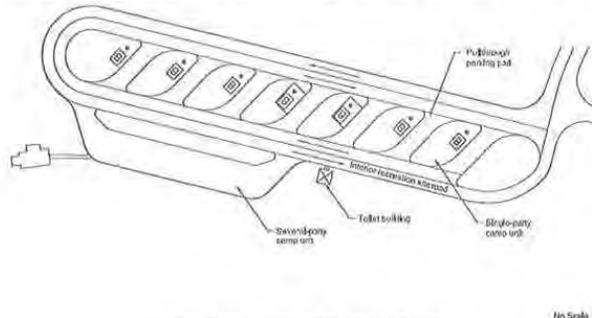


Figure 8-4—A campground loop road in a restricted space with a high level of development.

**Road Grade**

Design recreation site roads with minimal grades. Wayne Iverson (1985) suggests that the maximum road grade be 10 percent. A grade up to 12 percent may be allowed for no more than 100 feet (30.5 meters). When the route is considered a pedestrian access route, accessibility requirements apply. The *Forest Service Outdoor Recreation Accessibility Guidelines* (FSORAG) define an *outdoor recreation access route* (ORAR) as a continuous, unobstructed path intended for pedestrian use that connects constructed features within a picnic area, campground, or trailhead. The running slope on ORARs should be 5 percent or less. On steeper terrain, running slopes up to 8.3 percent are permitted for as long as 50 feet (15.2 meters). Running slopes up to 10 percent are permitted for as long as 30 feet (9.1 meters). Additional accessibility requirements apply and are detailed in the FSORAG. The suggested road grades are summarized in [table 8-2](#).

Table 8-2-Suggested road grades for equestrian recreation site roads.

Road element	Minimum grade (percent)	Maximum grade (percent)	Preferred grade (percent)
Interior recreation site roads	0	10	2 to 5
Site entrance or exit	0	5	1 to 2
Road cross slope (to allow adequate drainage)	1	2	1 to 2

**Road Profile**

Maintain landscape character by fitting recreation site roads to the natural terrain. The objectives are to keep cuts and fills to a minimum, ease pedestrian flow to facilities, and reduce construction costs. Keep cuts and fills less than 3 feet (0.9 meter). Wayne Iverson (1985) indicates it is usually possible to raise the finished grade about 6 to 12 inches (152 to 305 millimeters) above the natural grade to provide drainage in areas with gentle terrain.

**Road Drainage**

Avoid site damage by incorporating unobtrusive drainage structures to carry surface water off recreation site roads. Use culverts, drop inlets, dips, dikes, curbs, paved or unpaved ditches, and similar structures where needed. Low-profile culverts and drainage structures reduce fill requirements. After evaluating potential adverse environmental impacts, consider using a ford as a low-water crossing.

**Resource Roundup**

*The Green Book*

Recreation site roads are subject to guidelines published and regularly updated by AASHTO. Be sure to use the most recent editions. *A Policy on Geometric Design of Streets and*

<https://www.fhwa.dot.gov/environment/femhs/07232816/page14.htm>

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*Highways* addresses special-purpose roads that serve recreation sites. This comprehensive volume, sometimes called *The Green Book*, covers design speed, design vehicle, sight distance, grades, alignments, lane width, cross slopes, barriers, and related subjects.

A companion volume, *Guidelines for Geometric Design of Very Low-Volume Local Roads* (ADT ≤ 400), addresses design philosophy and guidelines. It also shows examples of unpaved roads and two-way single-lane roads. These AASHTO publications are available from the bookstore at [https://bookstore.transportation.org/item\\_details.aspx?ID=157](https://bookstore.transportation.org/item_details.aspx?ID=157).

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**Parking Area Design**

Design parking areas to provide smoothly flowing traffic circulation for vehicles pulling trailers. Avoid dead ends and allow the site's terrain and vegetation to guide the shape of parking areas. Consult [Chapter 8—Choosing Horse-Friendly Surface Materials](#) for information regarding surface options. The difference between equestrian parking areas and standard parking is the size of the parking spaces.

Because riders share most trailheads with many users, prevent conflicts by separating equestrian parking areas from other parking areas. Consult [Chapter 7—Planning Recreation Sites](#) for more information regarding separation. If the trailhead accommodates hikers, mountain bikers, or picnickers, provide passenger-vehicle parking spaces. According to Wayne Iverson (1985), the minimum size for passenger-vehicle parking spaces in recreation sites is 10 feet (3 meters) wide by 20 feet (6.1 meters) long. Make some parking spaces longer to accommodate longer pickup trucks. Provide accessible parking spaces. Forest Service parking areas must comply with the FSORAG. [Figure 8-5](#) shows parking area dimensions for standard passenger vehicles. If nonequestrians in motorhomes frequent the area, provide spaces for them. While motorhomes fit into equestrian parking spaces, it is better to separate the conflicting uses.

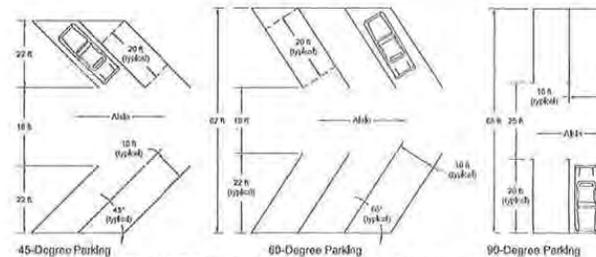


Figure 8-5—Parking dimensions and patterns for standard passenger vehicles. Increase the length of parking spaces if they will be used by pickup trucks with extended cabs and long beds. Forest Service parking areas must comply with the FSORAG.

Most drivers prefer pullthrough parking spaces that are angled 45 or 60 degrees, because the angled space is easier to navigate. Experience shows that this is true for both equestrian and nonequestrian drivers. Consider parking spaces angled at 90-degrees only for nonequestrian parking.

If space is limited, consider incorporating back-in parking spaces angled at 45 or 60 degrees. If angled back-in spaces are used on single-lane roads, locate the spaces on the driver's side of the road. As drivers back into the spaces, they can see obstacles on the inside of the turn more easily. The parking configuration is more obvious when back-in parking spaces contain wheel stops. Install the wheelstops in the parking space, 2 feet (0.6 meter) from the end. Parallel parking spaces, while less desirable than pullthrough spaces, also may be incorporated. [Figure 8-6](#) shows an equestrian parking area where space restrictions dictated the use of back-in and parallel parking spaces. A separate entrance and exit make the most efficient use of space. Landscape islands and exit and entrance signs guide parking.

<https://www.fhwa.dot.gov/environment/femhs/07232816/page14.htm>

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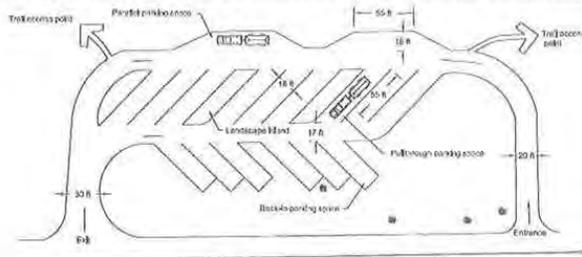


Figure 8-8--Equestrian parking in restricted spaces.

**Parking Area Grade**

For the safety and comfort of riders and their stock, equestrian parking areas need to be somewhat level. This makes it easier to unload stock and gear, to saddle an animal, or to spend time in mobile living quarters. Horses or mules tied to trailers are much happier standing for an extended period in a level area. The recommended grade for a parking area is 1 to 2 percent, a comfortable range that allows proper drainage of rainwater and animal urine. Accessibility requirements also stipulate grades within this range.

**Parking Area Layout**

The appropriate parking configuration depends on drivers' parking preferences, the number of parking spaces desired, and the size of the site. In a group camp, some riders are satisfied with an open area where they can park as they wish. Others prefer to have individual camp units, each with its own parking pad. Because preferences vary, visit with local horse organizations to discover their members' preferred configuration for group parking.

**Staging Areas**

Popular equestrian sites need staging areas where it is easy and safe to unload, groom, and saddle stock. This means providing extra length and width in parking spaces. Extra length allows riders to unload stock and tie them at the rear of the trailer. Extra width allows stock to be tied at the trailer's side. Figure 8-7 shows a rider saddling a horse in an area with inadequate space. The horse must stand close to the trailer, making it difficult to saddle the animal properly and safely. Figure 8-8 shows horses tied to a trailer with adequate staging area.



Figure 8-7--Saddling a horse or mule requires access to all sides of the animal, and tight quarters make the job difficult. Note the difference in the horse trailers. The trailer on the left has parallel horse stalls, and the trailer on the right has slant-load--or angled--stalls with a storage area behind the partially closed door.

http://www.bava.net/mot/equipment/Equine/200901E.html#144...

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Figure 8-8--Adequate space in parking areas makes it easier and safer to saddle and care for horses and mules. They are more comfortable and are more apt to wait quietly.

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To determine the optimum width for parking spaces, consider the trailer width, stock requirements, and space needed for walking behind the stock. Generally, trailers are 8 feet (2.4 meters) wide. Stock tied to the side of the trailer need about 12 feet (3.6 meters) at the side of the trailer, if they stand perpendicular to the trailer. Another 4 feet (1.2 meters) is needed for a person to safely walk or lead an animal behind tied stock. Where space allows, add an extra 4 feet for open doors on neighboring vehicles, for a parking space that is 28 feet (8.5 meters) wide. Figure 8-9 illustrates parking and staging dimensions for several vehicle and horse trailer combinations.

Determining the length of a parking space with staging area is similar to figuring its width. The minimum length required for safely unloading a horse or mule from the rear of a horse trailer with an open door or ramp is 15 feet (4.6 meters). Table 8-3 gives lengths of common vehicles and slant-load trailers, as provided by several horse trailer manufacturers. A slant-load trailer allows stock to stand diagonal to the sidewall instead of parallel (see figure 8-7). A gooseneck trailer is similar to a fifth-wheel trailer. An extension (the gooseneck) extends over the pickup bed and is attached to a ball hitch in the truck bed. Vehicle lengths range from a standard pickup truck pulling a two-horse trailer to a 44-foot (13.4-meter) motorhome towing a six-horse trailer with living quarters and tack room. Because many campgrounds use a garbage service, the length of a standard garbage truck is provided.

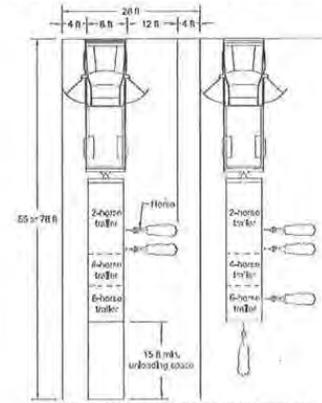


Figure 8-9--Optimum parking and staging dimensions for vehicles towing horse trailers.

Table 8-3--Lengths of vehicles, trailers, and a standard garbage truck. All trailers are slant loading.

Vehicle	Length (feet)
2-horse bumper-pull trailer	16*

3-horse bumper-pull trailer	19*
4-horse bumper-pull trailer	23*
6-horse bumper-pull trailer	32*
2-horse gooseneck trailer	26 to 33**
3-horse gooseneck trailer	28 to 35**
4-horse gooseneck trailer	32 to 39**
6-horse gooseneck trailer	42 to 49**
Pickup truck	15 to 22.5
Motorhome	32 to 46.5
Garbage truck	28

\* Measurements for bumper-pull trailers include the length of the hitch.

\*\* Measurements for gooseneck trailers do not include the overhang above the truck bed.

A 19-foot (5.8-meter) pickup truck towing a bumperpull, two-horse trailer would need a total length of 55 feet (16.8 meters) to park and unload safely. This includes a 15-foot (4.6-meter) unloading area plus walking space at both ends of the vehicle. A fourhorse gooseneck trailer drawn by a 16-foot pickup truck would need 78 feet (23.8 meters) for parking and loading. A 78-foot-long parking space covers most parking and loading needs. Forty-two-foot (12.8-meter) motorhomes pulling six-horse trailers with interior living quarters may need a space 110 feet (33.5 meters) long (figures 8-10 and 8-11). If these long trailers are common or expected in the facility, provide several longer spaces for them. If local riders commonly use two-horse trailers, provide some 55-foot- (16.8-meter-) long spaces for them.

**Trail Talk**

*Spatially Challenged*

Designers laying out the Blue Mountain Horse Trailhead near Missoula, MT, had very little space to provide rider, pedestrian, and bicyclist facilities. Local riders wanted parking areas that were 30 feet (9.1 meters) wide to accommodate stock tied to the sides of trailers. Doing so would have greatly reduced the number of equestrian parking spaces. To resolve the problem, planners chose 18-foot- (5.5-meter-) wide parking spaces and provided ample hitch rails nearby. For more information about this trailhead, see [Chapter 15--Learning From Others](#).



Figure 8-10--Horse trailers come in many different sizes and configurations. Common slant-load gooseneck trailers range from about 26 to 49 feet long.

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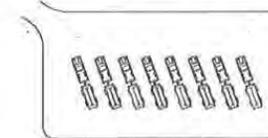
Figure 8-11--Some vehicles carry up to eight horses, contain living quarters, and include storage space.

**Open Parking Areas**

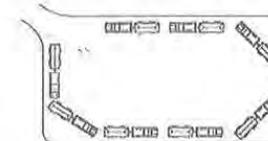
Some riders prefer a parking area that does not have defined parking spaces. This allows drivers to arrange vehicles in a manner that best suits their needs. When space is plentiful and riders want flexibility, an open parking area is appropriate for a group camp or trailhead. Where possible, locate open parking areas in a large, sparsely vegetated area with a slope no steeper than 4 percent.

Riders want to park facing the exit as they arrive, orienting their vehicles for an easy departure. The parking area should be large enough for undefined parking spaces 20 feet by 78 feet (6.5 meters by 23.8 meters) and aisles that are 15 feet (4.6 meters) wide per lane. The generously sized parking area will allow many parking configurations. Designers may plan one parking configuration and riders may park in a very different way. Figure 8-12 illustrates the planned configuration for a group camp and how horse groups, such as 4-H clubs, often park in the allotted space. The impromptu arrangement opens the center area for the club's activities.

A variation of the open parking area concept incorporates several small parking areas (figures 8-13 and 8-14). The small areas help break up the expanse of a large parking area and may be more attractive. In a group camp, having more than one parking area provides flexibility. A few different groups could use the site simultaneously or one large group could occupy all the parking areas.



How parking was planned



How some users park  
Figure 8-12--Designed parking compared to actual parking patterns.

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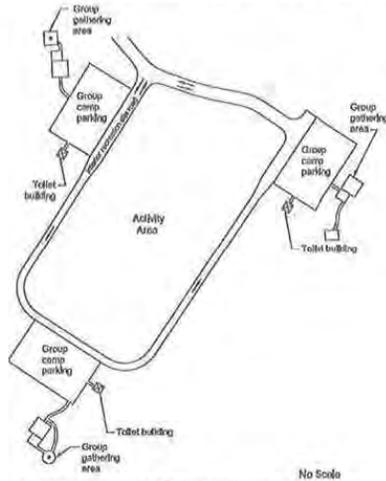


Figure 8-13--A recreation site for three small groups or one large group. An activity area is located in the center.

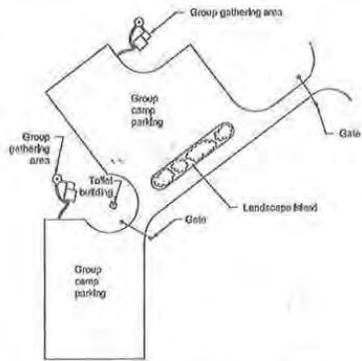


Figure 8-14--A group camp parking area that can be used by two small groups or one large group.

Small Parking Areas

**PK(b)-1**

Figure 8-15 shows a parking concept appropriate for small trailheads. The circulation pattern includes a loop turnaround to prevent vehicles from becoming trapped when all parking spaces are full. Because the parking area is not paved, arrows cannot mark the direction of traffic flow. In the United States, designers can use a counter-clockwise traffic flow that takes advantage of the familiar right-hand driving pattern. Landscape islands guide vehicle traffic and determine parking orientation. Directional signs may be a helpful addition, along with wheel stops.

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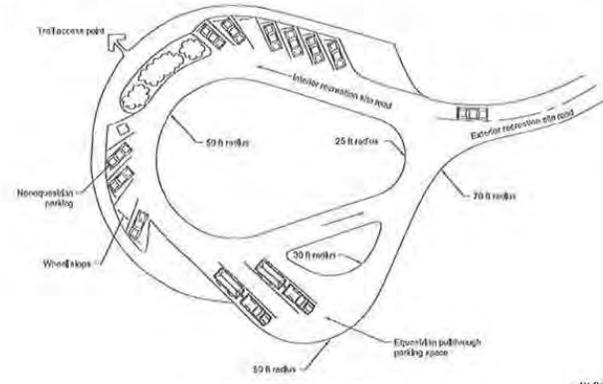


Figure 8-15--Loop parking at a trailhead.

Parking Delineation

Because paved equestrian parking areas are not recommended, delineating the parking spaces becomes a challenge. Many agencies don't delineate parking spaces. Where delineation is necessary, striping is just one of several alternatives.

**Trail Talk**

*Delineating With Concrete*

In the Southwest, where plowing and grading are uncommon, some land management agencies use concrete delineators (figure 8-16). The delineators are durable enough to resist chipping or breaking when an animal steps on them. Because they are buried in the ground, they will be damaged if areas are graded. To reduce tripping, they are maintained flush with the road or parking surface (figure 8-17). When painted with white reflective traffic paint, the markers are easily visible.



Figure 8-16--Concrete markers are used to delineate unpaved parking spaces in some areas of the country.

**Resource Roundup**

**Marking the Spot**

In 2002, the San Dimas Technology and Development Center (SDTDC) conducted a search for ways to designate parking on unpaved and gravel parking areas. The ideal solution would reduce traffic and eliminate confusion and other parking problems. The study investigated wheel stops, striping, construction whiskers, and a soil stabilizer. Designating Parking Areas on Unpaved Surfaces describes the results of the study and is available at <http://www.fhwa.dot.gov/environment/fspubs/html/022321314A02231314.htm>

**Existing Vegetation**

If there is natural vegetation in a planned parking area, consider preserving it and turning the surrounding area into a landscape island (see Figures 8-14 and 8-15). The vegetation visually breaks up the parking area, and the landscape island can guide motorized traffic and provide a spot for drainage basins. Where vegetation is sparse, preserve or plant trees and shrubs along parking area perimeters and in islands. The plantings relieve visual monotony, and the shade is invaluable in hot weather.

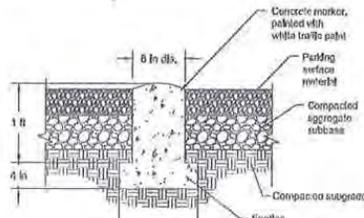


Figure 8-17--A concrete parking marker.

**Road and Parking Area Surfaces**

Equestrians frequently ride or stand on interior recreation site roads, in parking areas, and on parking pads. Many times these areas are paved with asphalt, chip seal, or concrete--surfaces that are not recommended for equestrian use. Pavement and stock don't mix well because the hard surface provides poor traction for metal horseshoes. Aggregate is the recommended surface for equestrian recreation areas, because it is slip-resistant, doesn't allow water to pool, and is comfortable to stand or walk on.

Pavement can be used for exterior recreation site roads, which often receive more traffic than interior roads (Figure 8-10). Major benefits to paving exterior roads include minimizing dust and reducing maintenance requirements. Because horses usually don't use exterior recreation site roads, pavement there generally doesn't pose a hazard. If paved exterior roads lead to trail access points, construct an adjacent, unpaved trail for horses and mules.

At a trailhead intended for shared use, apply aggregate only in the section where riders unload and saddle stock before a ride. Pave the remaining nonequestrian sections of the parking area (Figure 8-10). Consult Chapter 4--Choosing Horse-Friendly Surface Materials for more information regarding surfaces.

<http://www.fhwa.dot.gov/environment/fspubs/07232816/masc14.htm>

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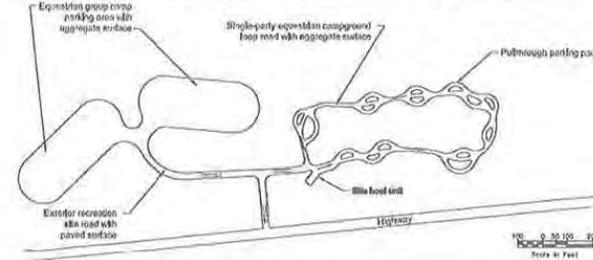


Figure 8-18--Pavement should not be used in equestrian areas. Paving the exterior recreation site road is an exception to this rule because stock seldom travel there.

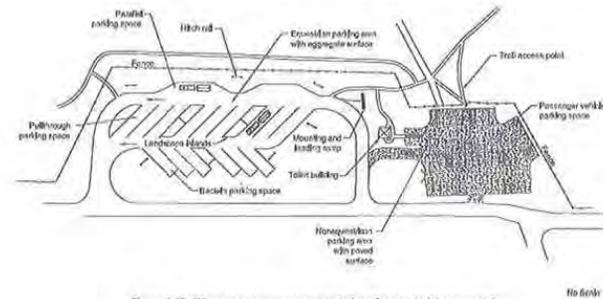


Figure 8-19--When user groups are separated, surface materials can match the needs of different groups. In this illustration, the equestrian parking area is surfaced with aggregate and the nonequestrian parking area is paved.

**Traffic Control**

Avoid placing barriers that restrict vehicles along the perimeters of site roads and parking areas that are traveled by stock. Barriers in these areas can be dangerous for stock and riders. Some stock may become nervous around barriers, such as wood bollards. This is especially true if the passageway between the bollards is constricted. Attempts to ride or lead a nervous animal through the barrier may produce a rodeo. While there are no completely horse-safe barriers, a wood or steel railing is suitable (Figure 8-20). Make sure barriers have no sharp edges or other potential hazards. Large boulders appear more natural to a horse or mule and may be an alternative to bollards.



Figure 8-20--A horse-friendly steel barrier.

<http://www.fhwa.dot.gov/environment/fspubs/07232816/page14.htm>

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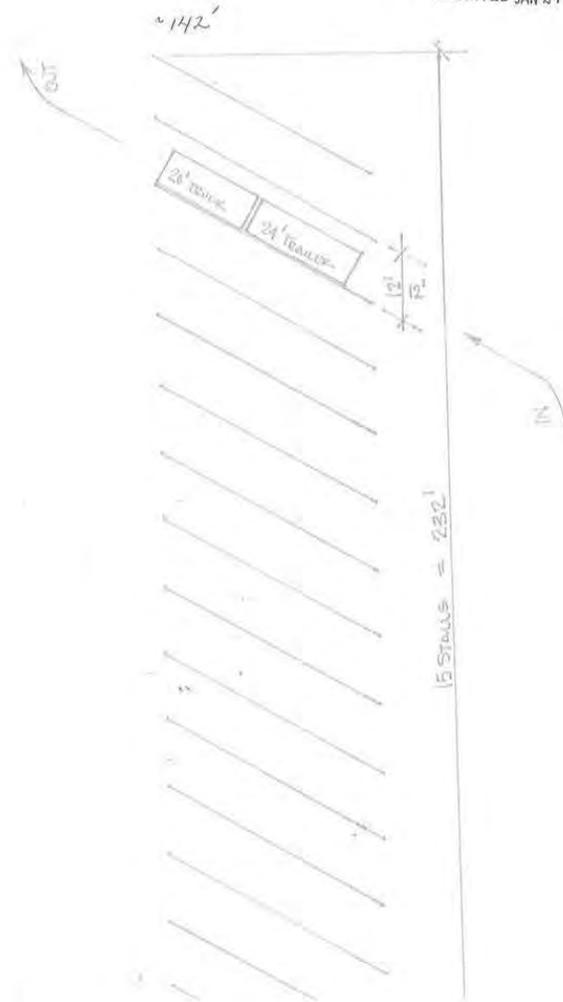


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United States Department of Transportation - Federal Highway Administration

PK(b)-1



PK(b)-2

**Response to Additional Information from Pamela Krahl, received January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
PK(b)-1	Thank you for providing the information on equestrian parking and staging area design guidelines. This information has been forwarded to the City for their review. Note that the project applicant is proposing to leave the equestrian parking area un-striped, similar to existing conditions, so that maximum flexibility is allowed to best suit equestrian needs.
PK(b)-2	Thank you for providing the sketch of space needed for equestrian parking. This information has been forwarded to the City for their review. Note that the project applicant is proposing to leave the equestrian parking area un-striped, similar to existing conditions, so that maximum flexibility is allowed to best suit equestrian needs.



Peter R. Andre (1938 - 2000)  
Michael J. Morris  
James C. Bulbery  
Dennis D. Law  
J. Todd Mirolla  
Scott W. Wall  
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Collette A. Hillier



City of Grover Beach  
January 28, 2011  
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January 27, 2011

Via Email and U.S. Mail

City of Grover Beach  
c/o Mary Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Re: Grover Beach Lodge and Conference Center  
Draft Environmental Impact Report

To Whom It May Concern:

This letter is submitted on behalf of the Le Sage Enterprises, Inc. the owner of Le Sage Riviera RV and Mobile Home Park (collectively the "Parks") in response to the Draft Environmental Impact Report ("DEIR") for the Grover Beach Lodge and Conference Center (the "Project").

The Parks are located at 319 Highway 1, Grover Beach, CA 93433, directly adjacent to the Project site. Access to the Parks from Highway 1 is via Le Sage Drive, which intersects the Le Sage Riviera Mobile Home Park and the RV Park. Although located on Highway 1, the Parks are prized for its tranquility and ability to provide a safe and relaxing environment for residents and travelers. A major benefit of the Parks is that they provide access to activities without the traffic and congestion issues found in the City.

There are four areas of concern for the Parks arising from the issues raised in the DEIR: 1) Traffic and Transportation; 2) Aesthetics; 3) Noise; and 4) Hydrology.

**TRAFFIC AND TRANSPORTATION**

The DEIR identifies two proposed access routes to the Project via Grand Avenue and Le Sage Drive. There are fundamental shortcomings in the discussion in the DEIR of the potential impacts and proposed mitigation measures related to the proposed access via Le Sage Drive.

LSE-1

21854.abc

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1337 Vine Street  
P.O. Box 5300  
Paso Robles, CA 94447-5300  
ph 805/591-3000 fx 805/591-3001

**Improper Access Route**

A section of Le Sage Drive from Highway 1 to the westerly boundary of the Le Sage Enterprises property line is privately maintained by the Parks. As the Project is currently designed, use of the privately maintained section of the road is necessary to enter the proposed access point for the Project via Le Sage Drive. It is improper for the Project to rely on access over the section of Le Sage Drive that is privately maintained. Imposing an increased use on a private road poses an unreasonable and uncompensated burden of additional maintenance and repairs on the property owners. It would further expose the Parks to increased liability in the event of an accident or occurrence on the privately maintained section.

LSE-1  
(cont'd)

In addition, it is questionable whether Le Sage Drive could support the proposed increased use. The bridge on the State maintained portion of the road is in need of repair and may need to be evaluated before it is subjected to an increase in vehicular and pedestrian traffic.

LSE-2

This issue is not currently addressed by the DEIR. A careful review of the proposed use on the privately maintained section of Le Sage Drive is critical to a full evaluation of the impact of the Project.

LSE-3

**Increased Traffic Flow**

According to the Project's Transportation Impact Analysis Draft Report ("TIADR"), the preliminary site plan models forty percent (40%) of the traffic accessing the Project via Le Sage Drive. The TIADR estimates that the Project would generate 1,727 new daily vehicular trips. This estimated rate was noted as a reasonable, "conservative" analysis for the Project. Based on the trip distribution model of forty percent (40%) accessing the Project via Le Sage Drive, there would be an increase of approximately 690 new daily vehicular trips on Le Sage Drive. This presents a serious impact on Le Sage Drive and the Parks. The DEIR acknowledges that the Project traffic volumes may create "significant impact" at the Le Sage intersection reducing the level of service below the City's goals. (TC Impact 4, TC Impact 8). The impact would be would target not only the business of Le Sage Enterprise, Inc. but also the permanent residents of the mobile home section and the city visitors of the RV section.

LSE-4

**Decline in Appeal**

Any increase in vehicular and pedestrian traffic negatively impacts the tranquil nature of the Parks and reduces it's the draw for its customers. One of the main attractions of the Parks is

LSE-5

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their ability to provide a quieter and more serene setting than that found at other parks located in the competing area. By increasing the traffic flow, the character of the area will be converted from a quiet, tranquil place to a high traffic commercial area. This would significantly reduce the appeal to travelers looking for a tranquil area and negatively affect the Parks' value. This impact would reduce the numbers of night rentals in the RV section as well as the rate that can be charged. For the mobile home park, this would reduce the rental values of the spaces as well as the home values of the mobile home owners.

Second, additional traffic will negatively impact the ability of customers to access the RV section. Some travelers may determine that navigating a congested area is too difficult and opt for a location with less traffic. Currently, due to the minimal vehicular traffic in the area, recreational vehicles are able to navigate Le Sage Drive and the RV section's driveway to turn around their vehicles. With increased traffic, accessibility will be limited and may have a negative economic impact on the RV section. The additional traffic would negatively impact the ability of homeowners of the mobile home section and their guests to access their homes. Many of the residents are elderly and can find the experience difficult to navigate.

**Reduced Safety**

There are also safety concerns related to an increase in pedestrian and vehicular traffic on Le Sage Drive. As a general matter, an increase of pedestrian traffic by the Parks will increase the possibility of vandalism or other property damage. The City should carefully evaluate what additional policing or monitoring of the area will be available once the area is subject to increased traffic.

In addition, there are safety concerns related to vehicles traveling Le Sage Drive. The RV section often hosts families with children, therefore, using Le Sage Drive as a major thoroughfare to access a hotel and conference center may adversely impact the safety of the guests and residents. In the mobile home sections, many residents have grandchildren who visit and the residents themselves cross Le Sage Drive to visit the office to pick up mail, conduct business, etc and this increase in traffic to the levels projected creates a real safety issue.

**Increased Congestion Due to Parking Issues**

The DEIR identifies specific concerns related to internal circulation in the Project. The proposed parking layout is poorly designed, resulting in isolated parking areas that will require drivers to re-enter Grand Avenue to access adjacent parking facilities. The DEIR acknowledges

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**LSE-5  
 (cont'd)**

that the current plan may create additional traffic on Highway 1 and at the Grand Avenue and Le Sage access driveways. The poor parking plan and lack of accessibility would further congest the Parks' access and cause additional traffic issues. Reworking the proposed parking plan will be vital to reducing the traffic flow concerns on Le Sage Drive.

Further, there is concern that the number of spaces allotted for the Project is insufficient and may cause visitors to park along Le Sage Drive, on the bridge and possibly in the Parks. This would result in increased congestion, reduce the available parking for residents, customers, and visitors to the Parks and increase safety concerns.

**LSE-6**

**Proposed Mitigation Measures (Traffic)**

The DEIR proposes mitigation of the increased congestion caused by the Project by providing for the re-stripping of the Le Sage Drive eastbound approach adding a left turn pocket.<sup>1</sup> The conclusion is that with mitigation, the impact on the Le Sage Drive intersection will be reduced to insignificance.

**LSE-7**

It is unlikely that the addition of a turn pocket will mitigate all of the traffic issues caused by the Project. Although it may improve the traffic flow and operations at the intersection of Le Sage Drive and Highway 1, the turn pocket will do nothing to address the problems resulting from increased traffic flow on Le Sage Drive. It also will do little to the impact of increased traffic and congestion on the character and safety of the area.

**LSE-8**

As an alternative mitigating measure, the Parks would propose a closure of Le Sage Drive at the end of the privately maintained section. This would allow traffic to access the Parks, but remove Le Sage Drive as an access route to the Project. This will eliminate safety and congestion issues as well as improve the operations at the Le Sage intersection at Highway 1.

**LSE-9**

The result would be access to the Project solely via Grand Avenue. To accommodate the increased use, Grand Avenue could be widened and additional entrances to the Project could be placed on Grand Avenue. This would route the traffic to the Project to an intersection controlled by a signal light, thereby avoiding the congestion issues along Highway 1 at Le Sage Drive

<sup>1</sup> The DEIR addresses this mitigation measure in 4.8.5 TC Impact 4 (TC/mm-6) stating that the applicant will be responsible for restriping and again in 4.8.6.2 TC Impact 8 (TC/mm-10) stating that the applicant will pay "their fair share" for restriping. Any costs related to mitigation of the impact of the Project should be borne by the applicant and in no event should the Park bear any of the cost related to these measures.

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**LSE-9  
 (cont'd)**

**LSE-10**

**LSE-11**

**LSE-12**

**LSE-13**



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identified in the DEIR. The Existing Plus Project Conditions shows that intersection levels of service at Grand Avenue meet the target level of service without additional mitigation measures. (Table 4.8-3).

Restructuring of the parking plan to be accessed solely via Grand Avenue would also avoid traffic from circulating onto Highway 1 to access additional parking and improve circulation in the Project via Grand Avenue. Redesigning the internal parking with one way flow circulating within the project would increase parking efficiency, traffic flow and safety within the Project and reduce the impact on the Parks.

**AESTHETICS**

The DEIR raises significant aesthetic concerns impacting the Parks and the surrounding area. The location of the Project site is currently a relatively quiet and tranquil residential and recreational area. It is unique in its ability to provide direct access to the beachfront without the congestion of the City. Construction of a Project designed to increase traffic will change the character of the area and detract from its peaceful setting.

As discussed above, the tranquility and serenity of the Parks is a key feature of the value and marketability of both the RV section and mobile home section of the Parks. Construction of a lodge and conference center complex that will draw in a large number of visitors will convert a once quiet area into a commercial hub. The increased traffic will reduce the value of the Parks as a whole and can have a negative impact on its profitability. The impact would be also sustained by the owners of the mobile homes upon resale.

**Scenic Vistas**

Of major concern to the Parks is the loss of its scenic vistas. The DEIR states that the Project will have a minimal effect on the views of the ocean and beach from Highway 1, Grand Avenue, and Le Sage Drive because these views are already obstructed by the Parks. Although the Project may have a minimal impact on reducing the view outside of the Parks, the Project will entirely eliminate any scenic vista viewed **from** the Parks. It is without argument that the loss of a beach and ocean view will decrease the value and appeal of the Parks.

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**LSE-13  
(cont'd)**

**LSE-14**

**LSE-15**

**LSE-16**

**LSE-17**

**LSE-18**



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**Lighting and Glare**

The DEIR notes that no specific information on lighting proposal has been submitted for the Project. Given the proximity of the Parks to the Project, the potential impact of night lighting and daytime glare is significant. Although some general mitigating measures have been proposed, it is important that a final lighting plan be carefully reviewed by the City prior to approval. Without a specific lighting plan, it is not possible to provide directed comments or alternative mitigating measures at this stage.

**NOISE**

The RV section is identified in the DEIR as a noise-sensitive land use in the area surrounding the Project. Therefore, the City has acknowledged that issues related to increased noise resulting from the Project are of special concern to the RV Park. Although the DEIR addresses the potential impact from HVAC units and construction activities, the area will experience a general increase in noise levels due to the increased activity, traffic, and congestion.

The DEIR indicates that traffic noise impacts are not expected and therefore mitigation is not required or appropriate for this Project. Due to its high sensitivity to noise, the Parks request additional investigation into the impact of the increased noise levels due to increased activity, traffic, and congestion from the Project.

**HYDROLOGY**

As an adjoining landowner, the Parks have concerns regarding the proposed drainage plan for the Project. The Project overview states that the "detention basins will drain easterly into Meadow Creek". Currently, there are subsurface sump pumps that manage sewer flows from the Parks. The concern is that if there is additional runoff from the Project into Meadow Creek and adjoining areas, the pumps may not be adequately protected. Although maintenance of the pumps is the obligation of the State, the Parks' operations can be negatively impacted if the pumps are flooded.

**CONCLUSION**

Based on the comments above, it is the position of the Parks that there are several shortcomings in the DEIR's analysis of the impact that the Project on the neighboring areas including the Parks. The Grover Beach Community Development Department should take

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**LSE-19**

**LSE-20**

**LSE-21**

**LSE-22**



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additional time to examine alternatives that meet the Project's objectives while minimizing the negative impacts on the area. As additional information becomes available, the Parks will supplement their comments.

**LSE-22  
(cont'd)**

Very truly yours,

Karen Gjerdrum Fothergill

cc: Douglas M. Le Sage  
William Le Sage  
Ruth Le Sage Reilly

22402404

**Response to Letter from Le Sage Enterprises, dated January 27, 2011**

Comment No.	Response
LSE-1	<p>The comment states that a portion of Le Sage Drive between Highway 1 and the western boundary of Le Sage RV Park is privately maintained, and it is therefore improper for the project to rely on this road as an accessway. State Parks was granted an easement over this portion of Le Sage Drive concurrently with transfer of the lodge site property in a Corporation Grant Deed recorded in the Official Records of the San Luis Obispo County Recorder's Office on December 10, 1971 as Instrument No. 34847. The easement granted to State Parks provides rights of ingress, egress, sewer, water, and gas lines and incidental purposes. Therefore, State Parks can properly rely on this accessway.</p> <p>A copy of the Grant Deed has been included in the Final EIR as Appendix F.</p>
LSE-2	<p>This comment states that the bridge along Le Sage Drive is in need of repair and may need to be evaluated to ensure it can safely accommodate the increased traffic associated with the proposed project.</p> <p>The City has indicated that it intends to add assessment of the condition of the bridge as a condition of project approval.</p>
LSE-3	<p>The comment states that the EIR fails to adequately address the issues related to the privately maintained portion of Le Sage Drive. Please refer to the response to Comment No. LSE-1, above.</p>
LSE-4	<p>This comment relates to Traffic Impacts 4 and 8 and impacts to the Le Sage Drive/Highway 1 intersection. The Revised Final EIR evaluated impacts at this intersection and concluded that <del>no</del><sup>a</sup> significant impact would occur as a result of the proposed project because LOS at the intersection would remain at LOS C and delay would not increase by more than 5 seconds. This determination was the result of proposed project revisions that orient parking and access further south towards the Grand Avenue access. Based on the new orientation, the revised traffic analysis estimated that only 25% of traffic would utilize the Le Sage Drive access, thereby reducing the number of additional trips on Le Sage Drive. <del>No mitigation measures are necessary. degrade to an unacceptable LOS D. Mitigation measures were proposed to minimize the impacts at this intersection, and after mitigation the impact was determined to be less than significant. Addition of a left-turn pocket to improve access to Le Sage Drive would meet the City's target LOS C.</del> The proposed use is also consistent with existing easement rights across Le Sage Drive held by State Parks. <u>Refer to Section 4.8, Transportation/Traffic, and Appendix N for additional information.</u></p>

Comment No.	Response
LSE-5	<p>The comment discusses a potential decline in appeal that would result from the proposed increase in traffic adjacent to the Le Sage RV Park. CEQA does not directly protect the “appeal” of properties surrounding a potential development. CEQA requires an analysis of surrounding land uses and a determination of the proposed project’s consistency with these uses. The project location and its vicinity are designated for Visitor-Serving/Mixed Use in the Grover Beach Land Use Element. The proposed project is consistent with this use. The legislature has enacted legislation which specifically found and declared that commercial development such as the proposed project was appropriate for this location (Public Resources Code §5003.02.1).</p> <p>The RV Park is already located adjacent to a busy Highway, and CEQA does not require an analysis of any potential impact on rental values when a project is considered consistent with adjacent uses and appropriate for the location. Additionally, the increased traffic that would result from the proposed project, <del>after mitigation</del>, would not raise the level of service on Le Sage Drive, Highway 1 or Grand Avenue beyond the City’s target LOS C.</p>
LSE-6	<p>This comment states that the increase in traffic on Le Sage may result in difficulty accessing the RV Park. As described above, the <u>proposed project, as revised, is not expected to result in any decrease in the level of service on Le Sage Drive. LOS is expected to remain at an acceptable LOS C and no impacts were identified.</u> <del>mitigation measures identified in the EIR are considered sufficient to mitigate potential traffic impacts on Le Sage Drive to less than significant.</del> The proposed use is also consistent with State Parks’ existing easement rights across Le Sage Drive. Traffic levels would not degrade below LOS C and no changes to the RV Park entrance or driveways is proposed.</p>
LSE-7	<p>This comment states that increased traffic on Le Sage Drive would result in an increase in vandalism or other property damage. The claim that increased daily traffic trips would result in an increase in vandalism and property damage is speculative. CEQA only requires an analysis of direct and indirect impacts associated with a project. It is fairly conjectural to assert that this impact would occur. Both State Parks and the City of Grover Beach would share responsibility patrolling the area.</p>
LSE-8	<p>This comment concerns safety issues related to increased pedestrian and vehicle encounters on Le Sage Drive. The proposed project would be subject to City codes and Caltrans requirements regarding speed limits, pedestrian crosswalks, signage, and sidewalks. These requirements are standard measures that have been established to improve the function, safety, and consistency of parking designs. These measures are generally considered sufficient to control safety issues associated with combined pedestrian and traffic uses. Also refer to Appendix F for the State Parks policy regarding accessible environments.</p> <p>CEQA states that a project may have a significant effect on Transportation/Traffic if the project would result in a substantial increase in hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment). The safety issues raised by the commenter relate to the general increase in traffic congestions and are not related to a specific design feature. The use has also been determined to be consistent with the surrounding area as described above.</p>
LSE-9	<p>This comment discusses the need to rework the parking design to improve internal circulation and accessibility. The EIR recommends redesign of the parking area to improve ingress and egress between individual parking areas, to allow turn-around space in each parking area, and to maximize parking. Refer to TC/mm-2 (TC/mm-3 in the Draft EIR) and TC/mm-3 (TC/mm-4 in the Draft EIR) in Section 4.8.5, Transportation/Traffic – Project-Specific Impacts and Mitigation Measures.</p>

Comment No.	Response
LSE-10	The comment addresses the possibility that overflow parking would utilize Le Sage Drive and the Le Sage RV Park for parking. The project has been designed to retain all 160 public parking spaces currently existing onsite consistent with LCP requirements. The project also proposes a separate lot for equestrian trailers, and public and private pull through spaces to accommodate larger trailers and motor homes to replace the dirt overflow lot that currently exists. Improperly parked vehicles along Le Sage Drive or in Le Sage RV Park could be towed by City or State Parks patrols.
LSE-11	The comment challenges the conclusion that mitigation would sufficiently mitigate traffic impacts on Le Sage Drive. The addition of a left-turn pocket <del>is no longer necessary to maintain</del> <del>would result in</del> LOS C traffic on Le Sage. LOS levels are an effective factor in determining whether an existing road system can accommodate projected traffic levels. The City of Grover Beach's target level is LOS C or better. Because <u>the proposed parking layout was re-oriented toward the south end of the site, potential impacts on Le Sage Drive were reduced to less than significant levels.</u> <del>mitigated</del> Conditions associated with the proposed project meet the City's goal of LOS C, <del>and is goal, they</del> are considered to be acceptable under CEQA. Refer also to responses to LSE-2 through LSE-4, above, related to increased traffic flows.
LSE-12	The comment proposes closure of Le Sage Drive to public traffic to mitigate impacts mentioned in earlier comments. Because there is an easement over this section of roadway, closure would not be in the best interest of State Parks. <u>Revised project details indicate that no decrease in LOS would occur.</u> <del>Mitigation discussed in response to the other comments indicates that traffic-related impacts have been properly mitigated.</del> Please refer to the responses to LSE-1, <u>4, 6, and 11</u> , above.
LSE-13	This comment proposes 100% project access from Grand Avenue. <u>Project revisions made since the July 21, 2012 Planning Commission hearing would re-direct internal traffic, with an estimated 25% utilizing Le Sage Drive and 75% using Grand Avenue, thereby reducing the traffic on Le Sage Drive.</u> Refer to the response to Comment No. LSE-12, above.
LSE-14	This comment also addresses restructuring of the parking plan to be accessed solely from Grand Avenue. Because this option does not appear to be a preferable option to the public, the applicant, the City or State Parks, an analysis of this alternative is not necessary in the EIR. <u>Refer also to the response to LSE-13, above.</u>
LSE-15	This comment correctly states that redesign of the internal parking would increase efficiency, traffic flow, and safety. Refer to response to Comment No. LSE-9, above.
LSE-16	This comment addresses aesthetic impacts on this relatively quiet and tranquil residential and recreational area. Please refer to the response to Comment Nos. LSE-5 and CCC-10, above.

Comment No.	Response
LSE-17	<p>This comment discusses an economic impact that would be felt by the RV Park and mobile home owners. This is not typically an impact that is considered under CEQA. CEQA Guidelines §131 states that economic or social effects of a project shall not be treated as significant effects on the environment and the focus of the analysis shall be on the physical changes. As discussed above, the project location has been determined to be appropriate for this commercial use (refer to response to Comment No. LSE-5, above). The area is designated for visitor-serving uses and a lodge and conference center project has been planned for this site for almost 30 years. The description of the existing setting as a quiet, tranquil setting is also questionable as the RV Park is located directly adjacent to Highway 1 and an industrial area located east of the highway.</p>
LSE-18	<p>This comment states that the project would eliminate views from within the Le Sage RV Parks. CEQA does not protect private views, but rather seeks to maintain scenic view corridors from public roadways and locations. A substantial adverse impact to a scenic vista would occur if the proposed project would significantly degrade the scenic landscape as viewed from public roads, or from other public areas.</p> <p>This comment has been forwarded to the City for its consideration; however, related impacts are not considered significant under CEQA.</p>
LSE-19	<p>The comment discusses potential impacts related to lighting and daytime glare and states that a final lighting plan should be reviewed by the City prior to approval. Mitigation measures AES/mm-4 and AES/mm-5 provide numerous measures that would reduce any potential impacts resulting from lighting and glare, including submittal of a comprehensive lighting plan subject to review and approval by the City.</p>
LSE-20	<p>This comment states that the potential for noise impacts resulting from increased traffic, activity, and congestion requires additional analysis in the EIR. The EIR measured existing noise levels at the project location and utilized projected traffic levels to estimate the potential increase in noise with the proposed project. The difference was an approximately 1 decibel increase, an amount which is generally not even perceptible.</p> <p><u>Additional noise modeling was performed after project revisions were proposed, which would relocate the conference center building to the northeast corner of the site adjacent to the Le Sage Mobile Home and RV Parks. The additional monitoring and noise analysis also concluded that the uses proposed at the conference center would not result in significant impacts to the Mobile Home Park or RV Park, because of distance, building design, shielding, and the existing ambient noise in the area currently caused by traffic on Highway 1, the railroad, Oceano airport, and surf and wind.</u></p> <p>Therefore, this impact is considered insignificant.</p>
LSE-21	<p>This comment relates to hydrology issues associated with the project location. Note that the proposed drainage basins will function to slow runoff into Meadow Creek by detaining waters onsite and allowing percolation into the ground. Please also refer to the responses to Comment Nos. Caltrans-1 through Caltrans-6.</p>
LSE-22	<p>This comment concludes the letter and no further response is necessary.</p>

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

- I support the suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.
- The Equestrian parking survey seems to be done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.
- The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

KL-1

KL-2

KL-3

Sincerely,

*Karen Luce*  
1525 Scenic View Way  
Nipomo, CA 93444

**Response to Letter from Karen Luce, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
KL-1	This comment relates to the equestrian-suggested alternative of a parking area north of the ranger station west of Highway 1. Please refer to Master Response EQ-9.
KL-2	This comment challenges the equestrian parking survey. Please refer to Master Response EQ-2.
KL-3	The comment relates to the Grand Avenue re-alignment suggested by the Coastal Commission but not carried forward for review in the EIR. Please refer to Master Response EQ-8.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [HYPERLINK](#)  
"mailto:mreents@swca.com" [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in **Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,

Dawn McVey

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

PAGE

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DMV-4

DMV-1

DMV-2

DMV-3

**Response to Letter from Dawn McVey, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
DMV-1	This comment relates to the proposed equestrian parking area in the dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DMV-2	The comment relates to the Grand Avenue re-alignment. Please refer to Master Response EQ-8.
DMV-3	The comment refers to a preferred equestrian alternative north of the ranger station. Please refer to Master Response EQ-9.
DMV-4	This comment challenges the equestrian parking survey results. Please refer to Master Response EQ-2.

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Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center-- second letter

Dear Mr. Buckingham;

I have again reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

\* Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact-- this street was just repaved last Tuesday, January 25<sup>th</sup>.

• Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

• The Equestrian parking survey (Appendix F-1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

VM-4

*Sincerely,  
Vicki Moore*

*Vicki Moore  
Coastal Mounted Assistance  
Ride Rhythm  
Los Padres Backcountry Horsemen*

VM-1

VM-2

VM-3

**Response to Letter from Vicki Moore, dated January 27, 2011**

Comment No.	Response
VM-1	The comment relates to the proposed location of equestrian parking in the dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
VM-2	This comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8
VM-3	The comment discusses an equestrian-preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
VM-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

GN-4

- The Equestrian parking survey (Appendix F-1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Mr. Bruce Buckingham  
 Community Development Director  
 City of Grover Beach  
 c/o Mary B. Reents, SWCA Environmental Consultants  
 1422 Monterey Street, Suite C200  
 San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center  
 Dear Mr. Buckingham:

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. WHY NOT? In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

Sincerely,

*Gloria Northcote*  
 805 4811905

Gloria Northcote  
 West Coast Rocky Mountain Horse Club

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
 FAX (831) 427-1877



GN-1

GN-2

GN-3

**Response to Letter from Gloria Northcote, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
GN-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
GN-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
GN-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
GN-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center – second letter

Dear Mr. Buckingham;

I have again reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

“ Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.”

This letter also states: “ The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **in Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives.”

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

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- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

SO-4

Sincerely,

*Shannon Orr*  
*Big Wakoa Horseback Adventures*  
[wanyrider2@gmail.com](mailto:wanyrider2@gmail.com)  
208-720-3923

SO-1

SO-2

SO-3

**Response to Letter from Shannon Orr, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
SO-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
SO-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
SO-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
SO-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

The equestrian parking area for this project needs to have attention to safety for both people and the horses. I have been a 4H Horse Project Leader for the past 8 years and have been riding this area for more than 30 years. It has been a joy to bring children to ride on the beach and in our beautiful dunes. There needs to be enough area, so there is plenty of space between horses and the trailers. Accidents can be preventable if proper planning, communication and common sense is applied.

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

“ Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.”

This letter also states: “ The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives.”

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. WHY NOT? In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

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- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time

for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

I personally ride the beach and dunes an average of about 50-75 times a year. Usually in the morning, before the winds come up.

Sincerely,

Beverly L. Poorman  
1196 Carpenter Canyon Road  
Arroyo Grande, CA 93420

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
PAX (831) 427-4877

**BLP-5  
(cont'd)**

**BLP-6**

**BLP-1**

**BLP-2**

**BLP-3**

**BLP-4**

**BLP-5**

**Response to Letter from Beverly L. Poorman, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
BLP-1	This comment concerns the space necessary to safely accommodate equestrian parking. Please refer to Master Response EQ-3.
BLP-2	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
BLP-3	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
BLP-4	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
BLP-5	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
BLP-6	The commenter states that she rides at Pismo Beach 50-75 times a year, typically in the mornings. Please refer to Master Response EQ-2.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:21 PM  
**To:** Emily Creel  
**Subject:** FW: Beach Parking

**From:** Hans & El-Jay Hansson [mailto:hansson@verizon.net]  
**Sent:** Thu 1/27/2011 11:20 AM  
**To:** Mary Reents  
**Subject:** Fw: Beach Parking

RIDE NIPOMO EQUESTRIAN TRAILS ALLIANCE, INC  
P.O. BOX 1738  
NIPOMO, CALIFORNIA 93444

January 27th, 2011

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street C200  
San Luis Obispo, Ca. 93401

Reference: Proposed Convention Center EIR

- 1. The proposed project does not respect the site and the surrounding environment.
- 2. The proposed project size, scale, and scope of the project far exceeds what is envisioned and allowed by the Coastal Act certified LCP.
- 3. The proposed project height, bulk and overall massing will have detrimental impact on public views from Highway 1, Grand Avenue looking north, from the ocean looking east, golf coursters and campers to the north looking south and east, and from Grover Heights looking towards the ocean.
- 4. Move the buildings farther away from the beach and the primary viewsheds because of their sensitive nature

RNETA-1  
RNETA-2  
RNETA-3  
RNETA-4

- 5. That the size and mass of the project will substantially degrade the existing local natural visual character and quality of the site and its surroundings.
- 5. The buildings do not blend with the natural environment.
- 6. The project is too large scale for the site and does not work well to bring the dunes and the natural environment into the site.
- 8. That the project will substantially alters the defining visual character of the surrounding area and the height, scale, and bulk overwhelms the site.

RNETA-5  
RNETA-6  
RNETA-7  
RNETA-8

Thank you

Hans R. Hansson  
President

**Response to Email from Ride Nipomo Equestrian Trails Alliance, Inc., dated January 27, 2011**

Comment No.	Response
RNETA-1	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-2	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-3	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-4	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-5	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-6	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-7	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.
RNETA-8	Please refer to the responses to Comment Nos. CCC-1 through CCC-13, above, related to impacts to visual resources.

RECEIVED FEB 07 2011

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham:

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

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- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,  
  
David Rosenthal  
Santa Ynez Valley Riders

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

DRo-1

DRo-2

DRo-3

DRo-4

**Response to Letter from David Rosenthal, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
DRo-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
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Mr. Bruce Buckingham  
 Community Development Director  
 City of Grover Beach  
 c/o Mary B. Reents, SWCA Environmental Consultants  
 1422 Monterey Street, Suite C200  
 San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham:

Equestrians can be the best stewards of the places they value and possess in common as a community. I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments as follows:

**Equestrian Parking Access:**

1. The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

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2. **The size of Equestrian Parking Spaces is unclear and must be defined before the equestrian staging area can be planned.**

- When I called Mary Reents office last week, her staff relayed a message from her to me that the size of the trailer parking spaces had not yet been determined. Nonetheless, the DEIR states there will be 10-15 spaces. Are these 20 feet wide and 46 feet long or? How can you quantify the total space needed, which they have already designated, without knowing the individual space size, and turning radius needed for the access lanes?

- The drawing in ES-2 Development plan #1 and #2 shows truck and horse trailers parked side by side in narrow spaces with no room provided to tie your horse to the side of the trailer and saddle and bridle them or even open your track room door. These spaces appear to be approximately 10 feet wide. This is a parking lot for trucks and horse trailers not a staging area that needs to have spaces approximately 20 feet wide. Are the State/City proposing that we have a valet service for our horses - that we only have one staging space to saddle and bridle the horses one trailer at a time, and then tie them to a hitching post, and then go park our trailer in the trailer parking provided? **This drawing has given many, the impression there will only be approximately 5 staging area spaces of approximately 20 feet wide (2 - 10 foot parking spaces).**

- The width, and lengths of the equestrian spaces in the staging area and the access roads around that parking dimensions needs to be defined, and delineated, and approved by the equestrian Advisory Committee before. What a staging area is also needs to be defined - it is not a parking lot.

3. **California Coastal Trail needs a staging area at Grand Avenue:**

The elimination of the staging area for equestrians near the Grand Avenue Exit would be a setback for the California Coast Trail for equestrians and hikers. The California Coastal Trail was designated California's Millennium Legacy Trail in 1999 by Governor Davis and the White House Millennium Council, encouraging federal agencies to assist in developing it. State legislation in 2001 aimed at a focused effort to complete the Coastal Trail. Assembly Concurrent Resolution 20 declares the Coastal Trail an official state trail and urges the Coastal Commission and Coastal Conservancy to work collaboratively to complete it. Senate Bill 908 charges the Coastal Conservancy, in cooperation with the Coastal Commission and State Parks Department, to submit to the Legislature a plan that describes how the Coastal Trail may be completed by 2008.

DRu-4

DRu-5

DRu-1

DRu-6

DRu-2

DRu-7

DRu-3

DRu-8

**4. A State policy is needed designating the site/staging area(s) for use by equestrians:**

A condition of the project approval needs to be that the State adopt policies defining a staging area is and designating the main staging area site and overflow staging area(s) for use by equestrians.

The General Plan calls for two staging areas for 20 vehicles with trailers plus a turf-ed overflow parking area to accommodate 20 vehicles. The general plan done in 1975 figures are way below the current demand at this time and additional spaces need to added to allow future growth. A study needs to be done of where the overflow spaces can be and if they could be broken up into different locations e.g. four at Oceano Pier Avenue Campground; six at North Beach Campground near the proposed dump station; and ten north of the Ranger Station on Highway 1.

The Horse trailer count done by the State was done over only 28 days on only certain days of the week and only in the afternoons. The horse trailer count must be re-done: Most equestrians ride in the morning and the count by the State is way too low. The State advised their count was dictated by when they had staff available to do it. Equestrians in the area have been asked to keep a count of the numbers of trailers at the beach when they are at the beach. This is an ongoing count and those sheets are available upon request. I have attached my count and provided pictures for most days. The ramp was closed 1/25, 26 & 27/2011. The count taken on Saturday morning at 10:00 and again at 11:00 illustrates how quickly the count changes.

The developer should be following the provisions of The General Development Plan for the Pismo Beach State dunes and Park which designates that there be two staging areas for an "Equestrian parking area to accommodate 20 vehicles with trailers plus a turf-ed-overflow parking area to accommodate 20 vehicles. The Grand Avenue parking lot has fulfilled both the 20 vehicles with trailers and the turf-ed-overflow parking since 1991 when Oso Flaco Lake was closed to equestrian vehicles and trailers.

Group equestrian rides in the past have been made up of from 20 to 25 vehicles and trailers of various sizes. The State has proposed that the public staging area could be closed to accommodate a group upon reservation and paying a use permit fee. That plan would leave no parking for equestrians that were not a part of that group and is unacceptable to a public use park without an overflow staging area in place.

**5. Dangerous condition:**

Elimination of a staging area at Grand Avenue and/or for failing to provide an overflow staging area(s) to use when the ramp is closed or the main staging area is full, would cause equestrians to have to park on the street. They would then be forced to tie their horses to the sides of their trailers in the street causing a hazardous condition for both horse, rider, and the public.

**6. Arterial road**

DRu-9

There is no arterial road around the development as called for in the General Development Plan of the Pismo Beach State Dunes and Park impeding public access. There is no map showing this access road or reference to this in the DEIR.

DRu-16 (cont'd)

**7. Watershed**

The project has too much impervious material (asphalt, cement, buildings) covering the ground leaving serious issues with water diversion and run-off that has not been thoroughly addressed in the DEIR and I don't believe can be mitigated because of the size of the development. The development puts too much of a human footprint on this land.

DRu-17

DRu-10

DRu-11

**8. No clear definition between public and private area**

No clear definition between public and private area and there will be increased foot traffic around the two hotel units and because the two hotel units are so far from the main hotel.

DRu-18

DRu-12

**9. Parking is insufficient for the development and the public and no fee day users today and in the future.**

As the parking lots are structured, when RVs with trailers pull onto Grand Avenue, they are committed to the beach ramp. There is no back-up room and space provided for them and the access ramp will be blocked (unless they use the proposed Equestrian staging Area C to turn around and this would make it very hazardous for the equestrians in that staging area). There are no open parking lots which will provide RVs with trailers to pull into and air down their tires to get onto the beach, or park and go into Finns Restaurant. The RV parking proposed is on the north side of La Sage.

DRu-19

DRu-13

The public parking needs to be easily accessed by the public without having to walk around the two hotel buildings positioned on the dunes. The State says it is all public access property but the public wont know that and respectful people will stay away from the hotel buildings, nor do they want to "hang" around buildings.

DRu-20

DRU-14

There is no drive-thru access to La Sage - parking lots are all dead-end and tight and look like they are for compact cars; Area 1 (C) shows a parking lot for trucks and horse trailers and not enough room for a motor home with a horse trailers.

DRu-21  
DRu-22

DRu-15

It is proposed that the convention center parking be labeled as such which will restrict that parking from the public use when the convention center is not in use. On Sunday January 25, 2011 Finns Restaurant Parking Lot was full (less 5 spaces). The current paved parking lot is to capacity on peak days now. The amount of parking proposed for the this project is not enough at today's use.

DRu-23  
DRu-24

DRu-16

**10. Grass park** - The grass area overpowers this development making it into a traditional park and uses over-vegetation for the area. While I agree some grass would be nice the plan for the grass area is too large and elevations are not indicated to show how user friendly that area would be. There are no picnic tables shown so the grass area is just for a picnic with a blanket on the ground or to play ball, or? Without user features the grass area is less inviting to the public day use and less likely to have people congregate in those areas. It appears the intended use of the grass area is to tie the Hotel complexes together

DRu-25

and provide for pools for water runoff. Moving the two hotel complexes on the dunes closer to the main hotel with a grass area around them distinguishes the public area of the grass area and invites the public to it.

**11. Grover Beach does not have a reclaimed water system.**

Having a reclaimed water system should be a requirement of this development to keep from diminishing our water table.

**12. Green Building Standards:**

The community resources would be better preserved by requiring this development to built at a Green Standard at least one level higher than the standard provided for in the DEIR (which is the minimum standard).

**13. Wetlands by Meadow Creek:**

There appears to be a wetlands (marsh area) between Meadow Creek and Grand Avenue. The DEIR proposes the source of this water is not a wetlands but is "possibly" a broken water pipe but has not investigated it. That area needs to be addressed in the geological report and defined whether it is a wetlands or indeed a broken water pipe. It would be a travesty to build this hotel on a wetlands.

**14. Fish and Wildlife Impact:**

Any negative impact on Fish and Wildlife should result in a ruling of No project by the Coastal Commission.

**15. Aesthetics**

The two separate hotel buildings do not blend with the natural environment and don't belong on the dunes. They have a substantial adverse effect on the scenic vista from all directions. They degrade the existing visual character and quality of the site and its surroundings. That area of the dunes needs to remain in its natural environment with an unobstructed coast view and enjoyment of the public without any buildings in close proximity. They look like a "ship wreck" on the sand bar and are obstructing the ocean view. It would be better to cluster these two hotel buildings in close proximity to the proposed hotel main building to better use the space. For aesthetics, their heights/elevations could be graduated. The proposed hotel buildings have a visually negative impact on the community character.

The main hotel building also does not blend with its environment and is too tall and massive and obstructs the ocean view. It looks like an "ocean liner." The architecture and design does not blend with the surroundings and the natural environment. It degrades the existing visual character and quality of the site and its surroundings. I don't believe the Amendment to the General plan which "capped" this development at a maximum of 150 room hotel, and specified conference rooms and a cafeteria, intended this massive a structure(s) with a pool on the second floor of the main hotel (used I believe to increase the floor space of the main hotel to generate more revenue) and a convention center (instead of conference rooms). This massive development will make too big of a foot print on this land. This development is way beyond the size, scope and mass of the intended development.

**DRu-26**

**DRu-27**

**DRu-28**

**DRu-29**

**DRu-30**

**DRu-31**

**DRu-32**

I have been a licensed real estate broker since the mid 1970s and this project is not being developed to its highest and best use. Instead, it is being over-developed (to generate revenue for the State and the City at the expense of the local day use purposes) which will de-value the property. The primary purpose of this property is and should be maintained as primarily low cost (no cost) day use and multi use beach access/parking. A hotel and conference rooms can fit but not on the scale being proposed. This is not only the present but the future of our public day use access to this stretch of the beach. This is a time when less (development) is more.

**16. Light and Glare:**

This project will significantly increase the light and glare that will affect day and night time views and require more than the mitigation measures provided for in the Mitigation. The building will have exterior and interior lighting which will then be evaluated by the City (the JP and applicant in this project).

**17. The Draft of the EIR is incomplete**

The DEIR is too rough a draft for meaningful public comment. It does not comply with nor cite the State of California Pismo Beach Dunes and Pismo Beach Park General Development Plan (1975). The maps show 10-15 parking spaces in proposed Area C (which the Coastal Commission has already informed the City that no development can be allowed in Area C). This project needs to be brought in conformance with the General Development Plan (1975) and returned to the public in an updated DEIR that has been thoroughly researched so the public can give meaningful input.

**18. Conflict of Interests:**

The City of Grover Beach has a reversionary fee estate interest in the hotel (ownership will revert to the City after 50 years) and is the applicant as part of the JP agreement. The City is capable of rezoning ordinances, amending master plans and use elements, and is in charge of or can greatly influence the Architectural Review Committee that will review and approve the project. There is no objective review of the project. All of the reviews by the City are subjective.

I respectfully request that the developer and the Coastal Commission seriously consider my comments (and those of the rest of the community) and bring this project into conformity with the natural environment, community character, prevent it from blocking our views and encroaching on the natural setting of the central coast, provide easy public day use access (for now and the future) for all users with an adequate and designated staging area for equestrians, and adequate RV and trailer access and parking as they go forward with this project. Thank you for continuing to preserve the natural environment and character of this stretch of beach.

Sincerely,

Deah Rudd

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office FAX (831) 427-4877.

**My Beach count of horse trailers**

Key: BP = Bumper Pull  
GN= Goose Neck

Thursday - 1/20/2011

<b>Extenuating Circumstances:</b> rocket was launched from Vandenberg at 1:10 - some equestrians avoided riding the beach				
@ 10:35	6	2 horse trailers		
	1	3 horse trailer		
	2	4 horse trailers		
<b>Total</b>	<b>9</b>			
@ 2:15	2	2 horse trailers		
<b>Total</b>	<b>2</b>			
			Daily Total	11

Friday - 1/21/2011

<b>Extenuating Circumstances:</b> no afternoon count taken				
@ 11:00	4	2 horse BP trailers		
	2	2 horse GN trailers		
	2	3 horse GN trailers		
<b>Total</b>	<b>8</b>		AM Total	8

Saturday - 1/22/2011

<b>Extenuating Circumstances:</b> no afternoon count taken				
@ 10:00	5	2 horse BP trailers		
	1	2 horse GN trailer		
	1	3 horse GN trailers		
	1	4 horse GN		
<b>Total</b>	<b>8</b>			
@ 11:00	2	2 horse BP trailers		
	1	3 horse GN w/living quarters		
<b>Total</b>	<b>3</b>			
			Daily Total	11

Sunday, 1/23/2011

<b>Extenuating Circumstances:</b>				
@ 10:45	2	2 horse BP trailers		
<b>Total</b>	<b>2</b>			
@ 1:10	4	2 horse BP trailers		
	1	1 horse BP trailers		
	1	3 horse GN		
<b>Total</b>	<b>6</b>		Daily Total	8

Monday - 1/24/2011

<b>Extenuating Circumstances:</b> no afternoon count taken				
@ 11:00	1	2 horse BP trailer		
	1	3 horse BP trailer		
	2	4 horse GN trailers		
<b>Total</b>	<b>4</b>		AM Total	4

DRu-39

Tuesday - 1/25/2011

<b>Extenuating Circumstances:</b> Grand Avenue RAMP ENTRANCE closed for paving - no afternoon count taken				
@ 11:10	2	2 horse BP trailers		
			AM Total	2

Wednesday - 1/26/2011

<b>Extenuating Circumstances:</b> Grand Avenue RAMP ENTRANCE closed for paving to dry - no afternoon count taken				
@ 11:00	1	6 horse GN trailer		
	2	2 horse BP trailers		
	1	3 horse X-long GN trailer		
	1	2 horse X-Long BP trailer		
			AM Total	5

Thursday - 1/27/2011

<b>Extenuating Circumstances:</b> Grand Avenue RAMP ENTRANCE closed for striping paving - no afternoon count taken; lot empty; horses staged on the street on Pier Avenue				
@ 11:30	2	2 horse GN trailer		
	1	2 horse BP trailers		
			AM Total	3

DRu-39  
(cont'd)



1/26/11

DRu-40



1/26/11

DRu-40  
(cont'd)



page 182



DRu-40

1/25/11  
Ramp  
closed



DRu-40  
(cont'd)



Page 16

Page 18



1/27/2011 Staging on  
Pier Avenue

DRu-40



1/27/11  
3-2H BP

DRu-40  
(cont'd)



Pier Avenue

page 1 of 2

**Response to Letter from Deah Rudd, dated January 27, 2011**

Comment No.	Response
DRu-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DRu-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
DRu-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
DRu-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
DRu-5	This comment refers to the size and spacing of the proposed equestrian parking spaces. Refer to Master Response EQ-3. Note that the project applicant is proposing to leave the parking area un-striped, much like the existing conditions, to allow for maximum flexibility and equestrian input in designing an area that best meets their needs.
DRu-6	Refer to the response to Comment No. DRu-5, above.
DRu-7	Refer to the response to Comment No. DRu-5, above.
DRu-8	This comment refers to the California Coastal Trail. The project has been designed to enhance this trail corridor and walkability and connectivity at the project location, through the inclusion of multiple trails, connectivity pathways, and outdoor areas to encourage public recreational activities at the beach. The project connects to an existing boardwalk and walking trail that extends from the northwest corner of the project site into Pismo Beach. The proposed project would provide additional recreational facilities to the city by providing, in addition to the lodge and conference facility, considerable boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property. Because the project would enhance these trail corridors and trail connectivity throughout the project location and surrounding areas, no significant impacts would occur.
DRu-9	This comment recommends a condition of project approval that the State adopt policies defining what a staging area is and designating the main parking area as well as an overflow site for use by equestrians. Many comments have been received from equestrians relating to the need to provide additional parking for this use. Please refer to Master Response EQ-1 and EQ-13 related to the amount of equestrian parking being proposed and how that amount relates to CEQA requirements.

Comment No.	Response
DRu-10	The comment relates to the General Development Plan reference to a 20-vehicle staging area and overflow parking to accommodate 20 additional vehicles. However, this reference was made in discussions regarding parking at Oso Flaco Lake, not Grand Avenue. No similar recommendations were included in the GDP for parking at the end of Grand Avenue.
DRu-11	The comment discusses the possibility of breaking up overflow parking in several different locations. However, CEQA does not require overflow parking as a component of the proposed project. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. Usage of the existing dirt lot for equestrian parking has been measured and parking sufficient to accommodate the typical peak demand has been proposed (Refer to Master Response EQ-2, above). Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
DRu-12	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
DRu-13	The comment refers to the General Development Plan for the Pismo Beach State Dunes and Park policy that equestrian parking for 20 vehicles with trailers plus turfed overflow for 20 additional vehicles be provided. This policy relates to “Passive Recreational Uses in Oso Flaco Lake Area,” not the area at the end of Grand Avenue. The GDP provides for “a system of trails for... equestrian use... paralleling access roads and connecting use areas” at the Grand Avenue location, but no parking recommendations are provided.  Please also refer to Master Response EQ-13.
DRu-14	This comment refers to the need to accommodate group rides make up of 20 to 25 vehicles. Please refer to Master Responses EQ-1 and EQ-2.
DRu-15	This comment addresses the potential dangers associated with parking and tacking a horse on the side of the street in the event parking within the designated area is not available. The City recognizes that this is a potential danger to horses, riders, and drivers. The proposed equestrian parking facility has been determined to be of a sufficient size to accommodate the typical peak demand (Refer to Master Response EQ-2). Therefore, although this may be necessary on peak days, this impact is considered insignificant.
DRu-16	This comment states that no arterial road around the development is shown as required by the GDP. The EIR preparers have reviewed the GDP and have not found any requirements for an arterial road around proposed development at the end of Grand Avenue. Arterial roads are generally streets that provide for the movement of large volumes of traffic between major traffic generators, collector streets, and/or the interstate. Grand Avenue is classified as a Major Arterial road by the Grover Beach Circulation Plan. Locating roads of comparable size, width, and capacity around the entire development would not be appropriate for this beachfront location.
DRu-17	This comment relates to hydrologic conditions on the project site. Please refer to the responses to Comment Nos. Caltrans-1 through Caltrans-6.

Comment No.	Response
DRu-18	This comment states that there is no clear definition between public and private areas. A large public outdoor recreational area has been proposed as part of the project. The project has been designed to seamlessly integrate the Lodge into the public area consistent with input from State Parks. The project also incorporates public visitor-serving and commercial uses at the lodge and conference center. The project incorporates a system of public trails connecting recreational uses and the project applicant will provide appropriate signage to designate private areas. This impact is considered less than significant.
DRu-19	This question relates to the circulation problems that would arise under the proposed parking lot configuration, as large vehicles that pulled onto Grand Avenue are not provided room to turn around and would be required to drive all the way onto the beach access. Refer to TC/mm-2 (TC/mm-3 in the Draft EIR) and TC/mm-3 (TC/mm-4 in the Draft EIR), which recommend redesign of the parking areas to provide increased ingress and egress, to maximize parking and to allow turn-around room. In addition, both the public and private parking lots south of Le Sage Drive include diagonal pull through parking spaces that would accommodate oversized vehicles. With implementation of this mitigation, this impact is considered insignificant.
DRu-20	The comment states that public walkways through the lodge and conference center buildings will cause confusion to pedestrians. The placement of the more urbanizing parking elements away from the beach and dunes and closer to the existing areas of development would help maintain the transitional character of the site and would reduce the project's visual affect on the natural coastal areas to the west. The project also proposed a plan for multiple trails and pathways with appropriate signage that would guide pedestrians to and from recreational areas and public parking. This impact is considered insignificant.
DRu-21	This comment relates to the dead end parking lots and lack of a passageway from Grand Avenue through to Le Sage Drive. Please Refer to TC/mm-2 (TC/mm-3 in the Draft EIR) and TC/mm-3 (TC/mm-4 in the Draft EIR). The parking lot will be redesigned prior to project approval to improve internal circulation and connectivity between parking areas.
DRu-22	The comment states that Area 1(C) does not provide adequate room for a motor home vehicle with a horse trailer. Please refer to Master Response EQ-3 related to design of the proposed equestrian parking area. Note that the project applicant has proposed leaving the equestrian parking area un-striped, much like existing conditions, to allow for maximum flexibility in accommodating various trailer sizes and equestrian needs.
DRu-23	The comment states that the lodge and convention center parking would be kept separate from public parking even at times when the convention center is not in use. The commenter is correct that portions of public and lodge parking are separated under the proposed project. This comment does not raise substantive comments related to the EIR and no further response is necessary.
DRu-24	This comment states that the proposed parking is not sufficient to accommodate existing parking at the site. The proposed project has been designed to retain all 160 formal public parking spaces currently existing at the project location consistent with the City's LCP. The project also proposes a separate parking area for equestrian uses to accommodate existing use of the adjacent dirt lot. While proposed parking is reconfigured and situated in several onsite locations that would require users to walk a greater distance to the beach, this does not rise to the level of a significant impact covered by CEQA. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in

Comment No.	Response
	response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
DRu-25	The comment states that the grass park area overpowers the development, making it a traditional park and constituting over-vegetation of the area. The project includes a landscape plan (refer to Figure 2-10 of the EIR). The plan calls for drought tolerant grasses and native dune species with an overall landscape concept to integrate the beach dunes into the overall design of the project. The project has been designed to incorporate natural surrounding plantings; therefore, the potential for the project area to look like a grassy park is considered unlikely.
DRu-26	Refer to the response to Comment No. DRu-25, above.
DRu-27	The comment states that having a reclaimed water system should be a requirement of the development to avoid diminishing of the water table. The City has determined, through the Land Use Element Update process and Draft Water Master Plan process, that there is adequate water available to service the project. Please refer to Section 4.9.8, Issue Areas with Less than Significant Impacts – Utilities and Service Systems, of the EIR for additional information.
DRu-28	<p>The comment states that the project should be required to meet a Green Development Standard at least one level higher than the standard provided in the EIR “which is the minimum standard.” The project is not proposing to obtain the minimum LEED standard. Buildings can qualify for four levels of certification: (1) Certified, 40-49 points; (2) Silver, 50-59 points; (3) Gold, 60-79 points; and Platinum, 80 points and above. The State of California is requiring a minimum of LEED Silver for all new construction on State Parks property.</p> <p>The proposed project will meet LEED Silver status by incorporating green building materials, orienting the buildings for better solar access (reducing heating and cooling requirements), utilizing solar panels or other energy efficient systems to obtain electricity for project-wide use, incorporating energy saving and water saving features throughout the project, using alternative forms of access to the project site, including design measures to link up with bus and train access as well as vehicular access.</p>
DRu-29	<p>The comment relates to potential wetlands located adjacent to the proposed RV dump station expansion. This 0.061-acre area does not appear to have existing connectivity to the adjacent Meadow Creek riparian area. However, the applicant has redesigned the area to avoid impacts to the wetland area.</p> <p>Refer to the response to Comment No. CCC-6, above.</p>
DRu-30	The comment states that any impact on fish and wildlife should result in a ruling of no project by the Coastal Commission. No impacts to fish or wildlife would occur as a result of the proposed project.
DRu-31	This comment relates to potential aesthetic impacts associated with the proposed project. Please refer to the response to Comment No. CCC-10, above, related to visual impacts.

Comment No.	Response
DRu-32	This comment relates to potential aesthetic impacts associated with the proposed project. Please refer to the response to Comment No. CCC-10, above, related to visual impacts.
DRu-33	This comment states that the primary purpose of this land is and should be maintained as primarily low (or no) cost day use and multi use beach access/parking. This decision ultimately lies with State Parks and the City, and this comment has been forwarded to them for their consideration. Note that a lodge and conference center at the project location has been discussed by the City and State Parks for almost 30 years, and is identified as planned future developments in various plans and policies dating as far back.
DRu-34	This comment relates to potential impacts associated with lighting and glare that would result from the proposed project. Mitigation measures AES/mm-4 and AES/mm-5 provide numerous measures that would reduce any potential impacts resulting from lighting and glare, including submittal of a comprehensive lighting plan subject for review and approval by the City, shielding of exterior lights from off-site views, minimization of light trespass through downward directional angling, utilization of the lowest level of lamination allowed by public safety standards, and avoidance of "white" colored light, among others.
DRu-35	The comment claims that the EIR is too rough and does not comply with the GDP for Pismo State Beach. Refer to Section 3.4.1.8, Environmental Setting – Pismo State Beach-Oceano Dunes State Vehicular Recreation Area General Development Plan (approved by State Parks April 1975) and Amendment to General Development Plan (approved by State Parks July 1982), of the EIR. Also refer to Table 3-1 in Chapter 3, Environmental Setting, for a consistency analysis of the proposed project under these plans.
DRu-36	This comment relates to the proposal to locate equestrian parking south of Grand Avenue even though Coastal Commission staff has indicated that it would not recommend approval of any development in this area. Please refer to Master Response EQ-7.
DRu-37	The comment states that the project needs to be brought into conformance with the General Development Plan. Refer to the responses to Comment Nos. DRu-10, DRu-13 and DRu-35, above.
DRu-38	The comment refers to a potential conflict of interest that exists because the City owns a reversionary fee estate interest in the hotel. The City does not own any reversionary interest in the hotel. State Parks, however, does and is also a member of the JPA. CEQA does not disallow this type of situation, and in fact allows local agencies to approve and permit their own projects as the lead agency under CEQA.
DRu-39	Thank you for the equestrian parking survey. Results have been taken under consideration as part of Master Response EQ-2. The comment will be forwarded to the City for its consideration.
DRu-40	Thank you for forwarding the pictures. They will be forwarded to the City for its consideration.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **in Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

DAS-1

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,

David and Anne Sommerville  
6010nLas Pilitas Rd.  
Santa Margarita, Ca 93453

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

DAS-4

DAS-2

DAS-3

**Response to Letter from Dave and Anne Sommerville, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
DAS-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DAS-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
DAS-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
DAS-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **In Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

JS-4

Sincerely,

Jordana Stark  
1505 Tiffany Ranch Road  
Arroyo Grande, CA 93420

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

JS-1

JS-2

JS-3

**Response to Letter from Jiordana Stark, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
JS-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
JS-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
JS-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
JS-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [HYPERLINK](#)  
"mailto:mreents@swca.com" [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in **Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,

Dr. & Mrs. Richard D. Tarver of Los Osos

RDT-4

RDT-1

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
PAX (831) 427-4877

PAGE

PAGE 1

RDT-2

RDT-3

**Response to Letter from Dr. and Mrs. Richard D. Tarver, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
RDT-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
RDT-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
RDT-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
RDT-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center – second letter

Dear Mr. Buckingham;

I am a horse enthusiast, long term resident and home owner on the Central Coast. I often ride my horse with friends and sometimes large groups at the Ocean Dunes. It is so discouraging to keep reading about the lack of support it seems the city has for the equestrian community. As you know, our area actually has a very large equestrian group. We need a large, safe parking area to unload and load our horses and enjoy the Dunes. The space needs to be large enough to accommodate big group rides that often occur there. Please ensure that we have a place to continue our excursions to the Dunes.

I received the following info below and concur with the findings and concerns:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

“ Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.”

This letter also states: “ The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives.”

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. WHY NOT? In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more

than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours): A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,

Stephanie Tippitt

Horse Enthusiast  
West Coast Rocky Mountain Horse Club Member  
Homeowner, taxpayer, active resident on the Central Coast

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

STI-4  
(cont'd)

STI-5

STI-1

STI-2

STI-3

STI-4

**Response to Letter from Stephanie Tippitt, dated January 27, 2011**

Comment No.	Response
STi-1	This comment discusses the need for large, safe equestrian parking. Please refer to Master Responses EQ-1, EQ-2 and EQ-4 related to equestrian parking needs and the spaces proposed to meet existing needs.
STi-2	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
STi-3	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
STi-4	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
STi-5	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants or [mreents@swca.com](mailto:mreents@swca.com)  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 27, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham:

I have reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

" Section 2.15.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **In Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

Sincerely,

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

STu-1

STu-2

STu-3

STu-4

**Response to Letter from Susan Tuttle, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
STu-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
STu-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
STu-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
STu-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:30 PM  
**To:** Emily Creel  
**Subject:** FW: Equestrian Parking at Grand Street

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**From:** Janette Wesch [mailto:jwesch71@gmail.com]  
**Sent:** Thu 1/27/2011 10:53 AM  
**To:** Mary Reents  
**Subject:** Equestrian Parking at Grand Street

**To:** Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Dear Mr. Buckingham,

We are concerned about the placement and loss of equestrian parking spaces at Pismo Beach Grand Street entrance. It seems that your advisers are not evaluating the need at the correct times. On Martin Luther King holiday at 3 pm, there were at least 11 horse rigs. I took a photo which I can forward to you, if that would be helpful.

We also agree with the Coastal Commission findings that the "size, scale and scope" of the project exceeds what is allowed by the Coastal Act. We know the land will be developed, but it should be able to benefit all. There is a way to add to the tourism value for Grover Beach without taking away the uniqueness that has always existed. We just have to find it. Tourists enjoy seeing horses on the beach and not a day goes by that 1 or 2 people don't stop us to take a photo or have their children visit with the horses. If we can't park, we can't ride.

Please evaluate the alternative of Grand Avenue Right-of-Way and re-aligning the street for the equestrian staging area.

Have a happy day!  
Janette & Larry Wesch  
863 Eastview Ave  
Arroyo Grande, CA 93420

[jwesch71@gmail.com](mailto:jwesch71@gmail.com)

JLW(a)-1

JLW(a)-2

JLW(a)-3

JLW(a)-4

**Response to Email from Janette and Larry Wesch, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
JLW(a)-1	This comment relates to the equestrian parking survey and states that on Martin Luther King weekend, there were at least 11 horse rigs parked at the project site. Please refer to Master Responses EQ-1 and EQ-2.
JLW(a)-2	The comment questions the size and scale of the proposed project. Please refer to the response to Comment No. CCC-10.
JLW(a)-3	The comment states that tourists enjoy seeing horses on the beach and equestrians need parking to continue to ride there. The City recognizes the special benefits provided by equestrians at this location. The project applicant and City have specifically arranged for retention of existing equestrian parking as a component of the proposed project. Please also refer to Master Response EQ-1.
JLW(a)-4	This comment relates to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Thursday, January 27, 2011 5:35 PM  
**To:** Emily Creel  
**Subject:** FW: Equestrian Parking at Grand Street

**From:** Janette Wesch [mailto:jwesch71@gmail.com]  
**Sent:** Thu 1/27/2011 4:17 PM  
**To:** Mary Reents  
**Subject:** Fwd: Equestrian Parking at Grand Street

To: Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Dear Mr. Buckingham,

I want to add this suggestion for an equestrian parking area to my earlier letter to you:

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

My earlier note:

We are concerned about the placement and loss of equestrian parking spaces at Pismo Beach Grand Street entrance. It seems that your advisers are not evaluating the need at the correct times. On Martin Luther King holiday at 3 pm, there were at least 11 horse rigs. I took a photo which I can forward to you, if that would be helpful.

We also agree with the Coastal Commission findings that the "size, scale and scope" of the project exceeds what is allowed by the Coastal Act. We know the land will be developed, but it should be able to benefit all. There is a way to add to the tourism value for Grover Beach without taking away the uniqueness that has always existed. We just have to find it. Tourists enjoy seeing horses on the beach and not a day goes by that 1 or 2 people don't stop us to take a photo or have their children visit with the horses. If we can't park, we can't ride.

Please evaluate the alternative of Grand Avenue Right-of-Way and re-aligning the street for the equestrian staging area.

Have a happy day!  
Janette & Larry Wesch  
863 Eastview Ave  
Arroyo Grande, CA 93420

[jwesch71@gmail.com](mailto:jwesch71@gmail.com)

cc: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
BAX (831) 427-4877

**JLW(b)-2  
(cont'd)**

**JLW(b)-1**

**JLW(b)-2**

**Response to Email from Janette and Larry Wesch, dated January 27, 2011**

<b>Comment No.</b>	<b>Response</b>
JLW(b)-1	This comment relates to a proposed alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
JLW(b)-2	This comment restates comments made in a previous comment letter. Please refer to the responses to Comment Nos. JLW(a)-1 through JLW(a)-4, above.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 28, 2011

Re: Draft EIR-Grover Beach Conference Center  
Dear Mr. Buckingham;

I was very disappointed to see the numerous environmental impacts and extreme mitigations required for the current proposed location of the Staging Area. To make matters worse, the letter dated September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission, made it VERY clear that they WOULD NOT SUPPORT this location, stating:

" Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area."

This letter also states: " The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, **In Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

It is clear that anywhere you put the Staging Area could be in conflict with other activities, the environment or just plain "in the way". The elimination of the Staging Area will not be an option and the following may alleviate many conflicts:

Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

Also, the Equestrian parking survey (Appendix F- 1 Pages 1-4) need to be much more comprehensive to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

RD-5

Sincerely,

Rob Dodds

Board Member – Ride Nipomo  
Frequent Beach Rider

RD-1

RD-2

RD-3

RD-4

**Response to Letter from Rob Dodds, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
RD-1	This comment refers to the numerous environmental impacts and extreme mitigation required for the proposed location of equestrian parking. It is unclear exactly what impacts and/or mitigation the commenter is referring to. Please refer to Master Responses EQ-1 through EQ-13 for additional information on the proposed equestrian parking area.
RD-2	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
RD-3	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
RD-4	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
RD-5	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:08 PM  
**To:** Emily Creel  
**Subject:** FW: horse parking

**From:** Lisa Fiske [mailto:fiskelisa@msn.com]  
**Sent:** Fri 1/28/2011 10:48 AM  
**To:** Mary Reents  
**Subject:** horse parking

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Please immediately look at **Appendix A-4** [www.grover.org](http://www.grover.org) a letter dated September 15, 2010, from the Coastal Commission, and in particular, page 2 paragraph 3:

**"Biological Resources:** The proposed horse trailer parking and staging area would be located south of Grand Avenue in vegetated dune habitat. Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area. The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives." Funny - they re-paved Grand from Hwy 1 to the Ramp yesterday. This proposal was not evaluated in the DEIR or mentioned at the Advisory Committee meeting. **We must request it be evaluated as an option.**

The letter sets out the **Coastal Commission's concerns** about the ways the proposed project may be found inconsistent with the Coastal Act and LCP:  
1. The proposed project does not respect the site and the surrounding environment.  
2. The proposed project size, scale, and scope of the project far exceeds what is envisioned and allowed by the Coastal Act certified LCP,

3. The proposed project height, bulk and overall massing will have detrimental impact on public views from Highway 1, Grand Avenue looking north, from the ocean looking east, golf courses and campers to the north looking south and east, and from Grover Heights looking towards the ocean.

LF-5

4. Move the buildings farther away from the beach and the primary viewsheds because of their sensitive nature

LF-6

5. That the size and mass of the project will substantially degrade the existing local natural visual character and quality of the site and its surroundings.

LF-7

5. The buildings do not blend with the natural environment.

LF-8

6. The project is too large scale for the site and does not work well to bring the dunes and the natural environment into the site.

LF-9

8. That the project will substantially alters the defining visual character of the surrounding area and the height, scale, and bulk overwhelms the site.

LF-10

**IMPORTANT** - If you have these **same concerns as the Coastal Commission**, and want the Coastal Commission's suggestion to evaluate the Grand Avenue Right-of-Way and re-aligning the street for the equestrian staging area, **be sure to include them in a letter to the City** before the deadline for public comment 1/28/11 at 5:00 p.m. even if you have to write one more letter. This is very important - the concerns and options we have voiced so far are not enough.

Lisa Fiske  
928 Anna Circle  
Nipomo, Ca 93444  
805-343-6020

LF-1

Hours in the barn are often pleasant. It's in my blood to love horses. I share my life with them. My horses know my secrets, we find our tears and wildness and bring into their lives. When in a sanctuary in my unsettled world.

LF-2

LF-3

LF-4

**Response to Email from Lisa Fiske, dated January 28, 2011**

Comment No.	Response
LF-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
LF-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
LF-3	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-4	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-5	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-6	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-7	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-8	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-9	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.
LF-10	Please refer to the response to Comment Nos. CCC-1 through CCC-13, above, related to potential impacts to visual resources.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 3:59 PM  
**To:** Emily Creel  
**Subject:** FW: Horse riding at beach

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**From:** Brenda Gilardone [mailto:gilardoneb@yahoo.com]  
**Sent:** Fri 1/28/2011 2:41 PM  
**To:** Mary Reents  
**Subject:** Horse riding at beach

Hello:

I am a resident of Orcutt, CA, 93455. I ride my horses on the beach and on the dunes at Oceano. I use the equestrian lot at the end of Grand Ave. This e-mail is to encourage you to plan an adequate equestrian staging and parking area that would allow safe, easy access to these popular recreation sites. I appreciate your consideration of this matter,  
Brenda Gilardone  
805-937-7930

**BG-1**

**Response to Email from Brenda Gilardone, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
BG-1	The comment requests an adequate equestrian staging and parking area to allow safe, easy access. Please refer to Master Responses EQ-1, EQ-2, and EQ-3.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
C/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 28, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham;

In the early 1990's, we were assured equestrians would have access to the beach at the end of Grand Ave in Grover Beach. For almost twenty years, the equestrian community has enjoyed this approximately one and one half acres of unpaved area, next to the parking lot for the restaurant. The State Parks put in the hitching post for our use.

NKJ-1

When this convention motel project was first proposed, on the site presently used by the equestrians, there was the understanding that 25 spaces for horse trailers units would be provided. Frankly this is inadequate to supply the current needs of equestrians using this area with no allowance for any increase. A minimum of fifty parking spaces for trailers, with room to tie horses to the trailer on each side, for tacking them would be reasonable and allow for groups which trailer in, for handicapped people and all size tow vehicles,

NKJ-2

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. In the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, and Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this.

NKJ-3

A preferred alternative location that equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would not attract non-equestrian parking as the proposed location would. It would provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

NKJ-4

The Equestrian parking survey did not include morning hour usage at all (the primary time for equestrians in the summer months). A complete survey, including morning, afternoon, and including evening hours during the summer usage, all days of the week and throughout the year would give an accurate reading of actual equestrian parking needs.

NKJ-5

Please reconsider reducing this staging area to service the community as planned. Please do not discriminate against horse people riding on the beach. It is a very special experience for many from a distance as well as for local residents. Many non-equestrians have been very open in their appreciated for seeing our horses on the beach.

NKJ-6

Sincerely,

Nora Jenae'

Kitt Jenae

**Response to Letter from Nora and Kitt Jena, dated January 28, 2011**

Comment No.	Response
NKJ-1	This comment refers to an agreement for equestrian parking at the end of Grand Avenue. Please refer to Master Response EQ-13.
NKJ-2	This comment relates to an understanding that 25 spaces would be provided for equestrians and also states that 50 spaces are needed to meet existing needs. Please refer to Master Response EQ-1 and EQ-12.
NKJ-3	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
NKJ-4	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
NKJ-5	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
NKJ-6	This comment requests that equestrian uses not be reduced. Please refer to Master Response EQ-1.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 3:58 PM  
**To:** Emily Creel  
**Subject:** FW: Grand and Highway 1

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**From:** Hillary Klein [mailto:hillary@hillaryklein.com]  
**Sent:** Fri 1/28/2011 3:16 PM  
**To:** Mary Reents  
**Subject:** Grand and Highway 1

Hello Mary,  
The planned Complex planned at Highway 1 and Grand will be infringing on my and other's ability to use and enjoy Grover beach and it's surrounding area. The fact that it is planned to reduce parking and make negligible the area for horse trailer parking and riding is completely contrary to what we need in this area.  
I recognize the need to bring in new and exciting commerce but not at the expense of local residents to enjoy our surroundings. That is park land put aside and intended for people to visit and enjoy the habitat and naturals surroundings. Please reconsider this decision to be in favor of people as well as nature, and NOT big business and money grubbing. Haven't we had enough of that over the past 12 years?  
Thank you

HK-1  
HK-2  
HK-3

Hillary Klein

**Response to Email from Hillary Klein, dated January 28, 2011**

Comment No.	Response
HK-1	This comment relates to equestrian beach access issues. Please refer to Master Response EQ-4.
HK-2	The comment states that the project reduces parking and provides a negligible amount of space for equestrian parking. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. While these spaces are reconfigured and situated in several onsite locations and would require users to walk a greater distance to the beach, this does not rise to the level of a significant impact covered by CEQA. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.
HK-3	<p>This comment requests a project that benefits people as well as nature. The project protects and enhances public access to the beach and dunes through added boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.</p> <p>Sensitive environmental resources have been adequately protected through site design and mitigation.</p>

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:31 PM  
**To:** Emily Creel  
**Subject:** FW: ltr.grover.2

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**From:** Pamela Krahl [mailto:pkrahl@wildblue.net]  
**Sent:** Fri 1/28/2011 3:47 PM  
**To:** Mary Reents  
**Subject:** ltr.grover.2

Thank you for your efforts on this issue.

Yours truly,

*Pamela Krahl*

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach

January 28, 2011

c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Re: Draft EIR-Grover Beach Conference Center – second letter

Dear Mr. Buckingham,

I am writing again to reiterate my concerns about equestrian parking, since new information has come to light. In my original letter I stated that I felt it was very unlikely we would be allowed to disturb the dune areas for parking, and indeed, we now have this confirmed in the existing letter from the Coastal Commission dated 9/15/10 by Ms. Calvalleri.

PK(c)-1

Again, I feel it is of the utmost importance that we have details concerning at least one or two other proposed sites for our lot. The area near the ranger station continues to be proposed, the rerouting of W. Grand Ave. or some other location needs to be designed and included in the development plan. It needs to be feasible and of adequate size.

PK(c)-2

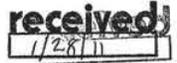
We appreciate your support of the equestrian community, and respectfully request that you press the design firm do their part in coming up with an alternative for us that has a chance of passing the approval process. They are, after all, developing a prime piece of park land that should keep beach access maintained for all users, not just patrons of their hotel and conference center.

PK(c)-3

**Response to Email from Pamela Krahl, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
PK(c)-1	This comment relates to the proposed location of equestrian parking in the dune habitat area south of Grand Avenue. Please refer to Master Response EQ-7.
PK(c)-2	This comment relates to alternative parking locations through re-alignment of Grand Avenue or utilization of the area north of the ranger station. Please refer to Master Responses EQ-8 and EQ-9.
PK(c)-3	The comment requests that beach access be maintained for all users. Please refer to Master Response EQ-4.

January 28, 2011



Dear City Planners.....

I am much dismayed at the proposal for the Grover Beach Lodge at Highway 1 and Grand Avenue. I feel you have not considered the impact of removing access (parking) to the public. It is unconscionable to remove access from the general public to house hotel guests. In fact, is there an actual need for an additional hotel in the 5 cities? I know the city anticipates tax revenue, but are you sure there is an unfilled need for this use of state park land?

LMC-1

LMC-2

If the city does move forward, perhaps you could re-draft the hotel plans and include underground parking (like the Sea Venture Hotel in Pismo Beach) leaving ample parking access for those members of the public arriving in cars, motor homes and truck/horse trailer rigs.

LMC-3

I know you have received many longer and more eloquent responses from the public comment period, but I did want to weigh in on this most important matter.

Thank you for your time and consideration of opinions that oppose this development in its current form.

Sincerely,

Lisa Margulies-Chadwick  
2610 Chamisal Lane  
Arroyo Grande, CA 93420

**Response to Letter from Lisa Margulies-Chadwick, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
LMC-1	The comment concerns the removal of parking and access at the project location. The project incorporates public parking and preserves all 160 existing formal public parking spaces at the site consistent with the City's LCP. The project protects and enhances public access to the beach and dunes through added boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, additional concessions, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.
LMC-2	This comment questions the need for an additional hotel in Grover Beach and questions the use of public state park land for this commercial purpose. Please refer to Master Response EQ-6.
LMC-3	This comment recommends redesign of project plans to include underground parking. This comment has been forwarded to the City for its consideration. Note that the parking proposed in conjunction with the project has been determined to be consistent with existing uses and CEQA requirements.

**Emily Creel**

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**Subject:** FW: Lodge and Conference Center at Grand and Hwy. 1 in Grover Beach

**From:** Maureendmartin@aol.com [mailto:Maureendmartin@aol.com]  
**Sent:** Fri 1/28/2011 1:21 PM  
**To:** Mary Reents  
**Subject:** Lodge and Conference Center at Grand and Hwy. 1 in Grover Beach

Mary B. Reents SWCA Environmental Consultant  
1422 Monterey St Suite C200  
San Luis Obispo, CA 93201

Mary B. Reents,

The City of Grover Beach is collaborating with the State park officials in planning a Lodge and Conference Center (LCC) at the corner of Grand and Hwy. 1.

**MM-1**

I became aware of this plan and noticed that the city is reducing the number of parking spaces for parking to the public. After reviewing the Environmental Impact Report (EIR) we noticed they were reducing all parking and limiting everyone's access to the beach. The LCC will have a large parking lot for their guests.

I am not happy that this development is removing areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less. I am concerned about using public park land to build a commercial resort.

**MM-2**

The project does not show adequate horse parking, motor home parking, or parking for local citizens who wish to access the beach. This concerns us about the overall planning for this proposed project. The idea of removing public State Park areas from public use is unacceptable. This issue limits access to the beach, and our land and park will be gone. Where will the dog walkers, joggers, walkers, bike riders, and horse riders park?

**MM-3**

I do not agree with the City of Grover Beach plan for the Lodge and Conference Center or the use of State park land for this use.

**MM-4**

Sincerely,

Maureen Martin

**Response to Email from Maureen Martin, dated January 28, 2011**

Comment No.	Response
MM-1	<p>The commenter states that the project will reduce parking for all uses at the site. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p> <p>The project would also protect and enhance public access to the beach through added boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, additional concessions, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property.</p>
MM-2	<p>The comment objects to the taking public lands out of public use and leasing it to a commercial developer. Please refer to Master Response EQ-6 related to the commercial leasing of state park lands.</p>
MM-3	<p>This comment states that the project does not show adequate parking for equestrians, motor homes, or local citizens. The proposed project has been designed to retain all 160 formal public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p>
MM-4	<p>The commenter opposes the project and the use of state park land for this use. Refer to Master Response EQ-6 and responses to Comment Nos. PLM-1 through PLM-5, above.</p>

**Emily Creel**

**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:07 PM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Lodge and Conference Center

**From:** Pamela Michaelis [mailto:horses@surfari.net]  
**Sent:** Fri 1/28/2011 10:59 AM  
**To:** Mary Reents  
**Subject:** Grover Beach Lodge and Conference Center

Pamela Michaelis  
494 Vista Del Robles  
Arroyo Grande, CA 93420  
January 28, 2011

Mary B. Reents SWCA  
Environmental Consultant  
1422 Monterey St C200  
San Luis Obispo, CA 93401

Dear Ms Reents:

I am a concerned citizen and tax payer. I also happen to be an equestrian. I am very concerned about the proposed Grover Beach Hotel and Conference Center proposed for State Park Property in Grover Beach. We are not happy that this development is removing areas devoted for public State Park Lands and leasing it to a commercial developer in an area which is growing rapidly and needs more parking spaces not less. We are concerned about using public park land to build a commercial resort. This is setting an unacceptable precedent for our area.

PM-1

Last Friday and Saturday I rode at the beach and parked at the proposed site. Both were January winter days and the parking lot by Fins restaurant was completely full. One day was a weekday morning and the other a random Saturday morning (not a holiday) and there were 9 horse trailers on Friday and 11 on Saturday as well as several RVs parked in the dirt parking area. I have been there on a holiday weekend when there was no parking available in the dirt lot. There are numerous hotels in the 5 cities area some of which are vacant and uncompleted. Grover Beach and the Pismo/Arroyo Grande area do not need another hotel. There are very few areas left in this county where horses are allowed to be ridden. Horses are part of the history of this country. The proposed parking for horses is inadequate. It has very little room between rigs which creates a dangerous situation because it does not allow for saddling, brushing, and tacking the horses for a ride. These tight spaces also create hazard since riders generally tie horses to the side of their rig as that is where tie downs are located.

PM-2

PM-3

PM-4

There is not planning for adequate horse parking, motor home parking or parking for local citizens who wish to access the beach. The idea of removing public State Park areas from public use and removing this area from the public use is unacceptable. The state parks promised adequate equestrian parking when we lost access to the Oso Flaco Lake area in the 1980's.

PM-5

PM-6

Please reconsider this development to something that takes the local needs including adequate parking for equestrians into consideration and not out of county tourists.  
Thank You,  
Pamela Michaelis

PM-7

**Response to Email from Pamela Michaelis, dated January 28, 2011**

Comment No.	Response
PM-1	The comment objects to the taking public lands out of public use and leasing it to a commercial developer. Please refer to Master Response EQ-6 related to the commercial leasing of state park lands.
PM-2	This comment relates to existing equestrian usage of the dirt parking area and states that 11 trailers or more have been counted utilizing the parking area on winter weekends. Please refer to Master Response EQ-2.
PM-3	This comment states that no additional hotel facilities are needed in Grover Beach. This is not typically a CEQA concern. Note also that a hotel has been planned for this site since the 1980s. Refer also to Master Response EQ-6.
PM-4	This comment relates to the spacing needed between horse trailers to provide safe parking conditions. Please refer to Master Response EQ-3.
PM-5	<p>This comment questions the adequacy of all parking and the use of public lands for commercial purposes. The proposed project has been designed to retain all 160 public parking spaces currently existing at the project location. The project also proposes a separate parking area for equestrian uses. Note also mitigation measure TC/mm-2 (TC/mm-3 in the Draft EIR), which has been amended in response to Comment No. CCC-13, above, to include maximization of parking. Therefore, the EIR found this to be an insignificant impact.</p> <p>The project would also protect and enhance public access to the beach through added boardwalks and paths throughout the complex, renovated picnic areas adjacent to the dunes, access to a Meadow Creek natural area, interpretive signage explaining the habitat values of the area, additional concessions, outdoor seating, public parking, a public drop off area, and landscape enhancements to increase the aesthetic value of the property. Please also refer to Master Response EQ-6.</p>
PM-6	This comment refers to an agreement to provide parking at the close of Oso Flaco Lake. Please refer to Master Response EQ-13.
PM-7	This comment requests that local parking needs be accommodated in the project design. Please refer to the response to Comment No. PM-5, above.

Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

January 28, 2011

Re: Draft EIR-Grover Beach Conference Center

Dear Mr. Buckingham,

I have again reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

“Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.”

This letter also states: “The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in **Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives.”

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. **WHY NOT?** In fact—this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice – A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.

KS-1

KS-2

KS-3

- The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

**On behalf of the Advisory Committee why wasn't the option of using the Grand Avenue right-of-way with realignment of street (as suggested by the Coastal Commission) evaluated for an Equestrian parking possibility as an option in the DEIR?**

Sincerely,

Kathy Schwartz

Kathy Schwartz  
Atascadero Horsemen's Club

CC: Madeline Calvalleri, Coastal Planner, Central Coast District Office  
FAX (831) 427-4877

KS-4

KS-5

**Response to Letter from Kathy Schwartz, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
KS-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
KS-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
KS-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
KS-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
KS-5	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.

Emily Creel

From: Mary Reents
Sent: Friday, January 28, 2011 3:46 PM
To: Emily Creel
Subject: FW: Draft EIR- Grover Beach Conference Center

From: DENISE SEIDMAN [mailto:deniseseidman@yahoo.com]
Sent: Fri 1/28/2011 4:24 PM
To: Mary Reents
Subject: Draft EIR- Grover Beach Conference Center

Mr. Bruce Buckingham January 28, 2011
Community Development Director
City of Grover Beach
c/o Mary B. Reents, SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401
Re: Draft EIR-Grover Beach Conference Center – second letter
Dear Mr. Buckingham:

I have again reviewed the draft EIR for the proposed Grover Beach conference center and have serious concerns and comments. They are related to the Equestrian parking and are as follows:
The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. Her letter has made it VERY clear that they WOULD NOT SUPPORT this alternative, stating:

“Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.”

This letter also states: “The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in Grand Avenue right-of-way with realignment of street, etc) or its elimination, if there are no feasible alternatives.”

The Coastal Commission suggestion of the Grand Avenue Realignment WAS NOT considered as an alternative. WHY NOT? In fact – this street was just repaved last Tuesday, January 25<sup>th</sup>.

- Our first choice - A suggested alternative location that we equestrians prefer (North of the ranger station West of and alongside Highway 1) just North of the State Parks Corporation Yard, (which is filled with large vehicles and sand moving equipment) received little or no consideration. It has no dunes, and it is far from the crowded entrance to the Grand Avenue beach access and would allow separate access to the dune trail system. It would also not attract non-equestrian parking as the proposed location would. It would also provide more than 30,000 sq ft of parking without movement of earth. I believe any of the minor environmental issues could be addressed and dealt with. This would also remove the equestrians from the conference center area.
• The Equestrian parking survey (Appendix F- 1 Pages 1-4) was obviously done as an afterthought to be included at the last minute in the draft EIR. It did not include morning hour usage at all (a primary time for equestrians in the summer months is morning hours). A complete survey, to include morning, afternoon, and in the summer, evening hours usage times, all days of the week and throughout the year should be done to show actual equestrian parking use.

I beseech you and the planning commission to make sure there continues to be equestrian parking and enough of it to let the many equestrians who use this area to continue to enjoy it and to attract interested persons from

outside our county to come and enjoy. This is one of the things that makes this area so attractive and different from the rest of California.

Sincerely,

Denise Seidman

Denise Seidman
Longtime resident of San Luis Obispo County and Equestrian User of Grover Beach
380 Butterfly Lane
Nipomo, CA 93444
805-264-7228
deniseidman@yahoo.com

DS-5 (cont'd)

DS-1

DS-2

DS-3

DS-4

DS-5

**Response to Email from Denise Seidman, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
DS-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DS-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
DS-3	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.
DS-4	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
DS-5	This comment requests adequate equestrian parking be provided. Please refer to Master Response EQ-1 and EQ-2.

Mr Bruce Buckingham  
Community Development Director  
City of Grover Beach  
c/o Mary B. Reents, SWCA Environmental Consultants  
1422 Monterrey Street, Suite, C200  
San Luis Obispo, CA 93401

Re: Draft EIR-Grover Beach Conference Center

January 28, 2011

Dear Mr. Buckingham;

As an equestrian of this community, I respectfully request consideration to be given to the proposed parking area for equestrian use. I understand that in the Draft EIR the proposed equestrian parking area is to be located within the existing dunes, south of the present location off Grand Ave. It is my understanding that this proposed location may pose a conflict with the Coastal Commission.

**SSt-1**

As an alternative, I support the location put forth by Linda Clarke. This proposal suggests locating the equestrian parking area to just north of the State Parks Corporation Yard off Hwy 1.

**SSt-2**

Thank you for your attention in this matter.

Saragail Standish  
1578 Illinois Way  
Nipomo, CA 93444

**Response to Email from Saragail Standish, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
SSt-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
SSt-2	This comment discusses the equestrians' preferred alternative parking location north of the ranger station. Please refer to Master Response EQ-9.

January 28, 2011

To: Bruce Buckingham

From: Laura Linda Strickland

Re: Horse trailer parking at Pismo Dune Beach

Please allow for horse trailer parking in your plans for development! The trails at the dunes are very important to us riders and we need access and parking. Please don't eliminate the use of these wonderful trails for equestrians. It is part of the charm of the Central Coast and parking needs to be considered. I would appreciate your concern in this matter, and hope you would allow for parking for larger rigs and room to turn around.

LLS-1

Thank you,

Laura Linda Strickland  
2139 Equestrian Rd.  
Paso Robles, Ca 93446  
805 550-2711

**Response to Letter from Laura Linda Strickland, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
LLS-1	This comment requests adequate equestrian parking be provided, including parking for larger rigs and room to turn around. Please refer to Master Response EQ-1, EQ-2 and EQ-3.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 4:08 PM  
**To:** Emily Creel  
**Subject:** FW: equestrian staging/parking area

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**From:** Linda Walden [mailto:jetspirit@gmail.com]  
**Sent:** Fri 1/28/2011 10:53 AM  
**To:** Mary Reents  
**Subject:** equestrian staging/parking area

Dear Sir:  
Being able to ride on the beach is comparable to being able to drive on the beach, but with far less ecological effect.

LW(b)-1

To be able to ride, one must trailer the horse(s) to the beach, park, saddle up and off to ride.

To be able to park, there must be a staging area. Equestrians have in effect eminent domain due to the many years of using the area immediately adjoining the parking lot by the restaurant.

LW(b)-2

To be able to be equal human beings with equal rights, equestrians should not be diminished in importance.

LW(b)-3

Please treat us as equal citizens and honor our long term use of at least 25-50 parking zones on the site.  
Linda Walden  
Nipomo, CA

**Response to Email from Linda Walden, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
LW(b)-1	This comment discusses the need for a parking and staging area for equestrian users. Please refer to Master Responses EQ-1 and EQ-2.
LW(b)-2	The comment states that equestrians have eminent domain rights to use the existing parking area. Eminent domain is an authority that lies only with governmental agencies; private equestrians cannot acquire those rights. Please also refer to Master Response EQ-1 related to prescriptive rights.
LW(b)-3	This comment relates to the need for 25 to 50 equestrian parking spots. Please refer to Master Responses EQ-1 and EQ-2.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Friday, January 28, 2011 6:06 PM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Lodge DEIR

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**From:** Else\_Wolff@URSCorp.com [mailto:Else\_Wolff@URSCorp.com]  
**Sent:** Fri 1/28/2011 5:59 PM  
**To:** Mary Reents  
**Subject:** Grover Beach Lodge DEIR

Dear Ms. Reents,

I am the president of the Santa Ynez Valley Carriage Club. Our club frequently visits Grover Beach and uses the project area as our coastal access point. The baseline survey that you conducted under-represents all facets of equestrian use, mainly because it was conducted in the afternoon. Horse folk are more often out in the morning and packed up and gone by the afternoon.

EW-1

The proposed project equestrian use space is insufficient for group rides. Multiple users need space between trailers to tie up horses and turn around.

EW-2

Thank you,  
Else Wolff

1152 Easy Lane  
Nipomo, CA

(805)929-6815

**Response to Email from Else Wolff, dated January 28, 2011**

<b>Comment No.</b>	<b>Response</b>
EW-1	This comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
EW-2	The comment states that the proposed parking is insufficient and that adequate space is needed between trailers to tie horses. Please refer to Master Responses EQ-1 and EQ-3.

RECEIVED FEB 01 2011

January 29, 2011

Mary B. Reents  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Attn: Mr. Bruce Buckingham  
Community Development Director  
City of Grover Beach

Re: Grover Beach Conference Center

Dear Mr. Buckingham;

I have serious concerns regarding the proposed Grover Beach conference center. They are related to the Equestrian parking and are as follows:

DJ-1

The primary suggested equestrian parking location South of Grand Avenue is on existing dunes. Included in the draft EIR is a September 15, 2010 letter to you from Ms. Madeline Calvalleri, Coastal Planner, Central Coast District Office of The California Coastal Commission. In her letter she states that this alternative parking location would not be allowed.

\* Section 2.1.5.A of the LCP contains Sand Dune Policy 1, which prohibits development in vegetated dune areas. As we have indicated in the past, we cannot support the proposed development in this dune area.\*

This letter also states: "The Draft EIR must analyze alternatives to account for the horse facility outside of this dune area (e.g., as previously discussed, off-site, in **Grand Avenue right-of-way with realignment of street**, etc) or its elimination, if there are no feasible alternatives."

DJ-2

The Coastal Commission suggestion of the Grand Avenue Realignment wasn't considered as an alternative. Why hasn't it been since it has been recently repaved.

I just wanted to add my voice to the concern regarding equestrian parking. We love riding there and have enjoyed this luxury for many years. It would be a shame to exclude us from access to this special riding location. I feel like all our freedoms are being taken away. Please don't let this happen.

DJ-3

Sincerely,

*Donna Joyce*  
Donna Joyce  
Equestrian

Member: Fillies, Santa Ynez Valley Riders, Lompoc Valley Riders  
Pacific Coast Longriders, West Coast Rocky Mountain Horse

Cc: Madeline Calvalleri, Coastal Planner, Central Coast District Office FAX (831) 427-4877

†

**Response to Letter from Donna Joyce, dated January 29, 2011**

<b>Comment No.</b>	<b>Response</b>
DJ-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DJ-2	The comment refers to the Grand Avenue re-alignment alternative. Please refer to Master Response EQ-8.
DJ-3	This comment states that equestrian freedoms are being taken away. Please refer to Master Response EQ-1.

**Emily Creel**

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**From:** Mary Reents  
**Sent:** Wednesday, February 09, 2011 10:57 AM  
**To:** Emily Creel  
**Subject:** FW: Grover Beach Parking

**Darcy Murphy**

**Resident & Tax Payer**

Mary B. Reents  
Senior Consultant  
**SWCA Environmental Consultants**  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
(805) 643-7095X103  
(805) 643-2367 (FAX)  
[mreents@SWCA.com](mailto:mreents@SWCA.com)  
[www.swca.com](http://www.swca.com)

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**From:** DMurphy81@aol.com [mailto:DMurphy81@aol.com]  
**Sent:** Saturday, January 29, 2011 8:29 AM  
**To:** Mary Reents  
**Subject:** Grover Beach Parking

Mr. Bruce Buckingham

**Community Development Director**

**City of Grover Beach**

c/o Mary B. Reents

**SWCA Environmental Consultants**

1422 Monterey Street, Suite C200

San Luis Obispo, CA 93401

Gentlemen:

I'm opposed to the proposed equestrian suggested parking location proposed in conjunction with the Grover Beach Conference Center. As I understand through reading the EIR and Coastal Commission reports it is not possible to locate the new parking area in the dunes. Please research this more. A complete survey, to include morning, afternoon and in the summer, evening hours usage times, all days of the week & throughout the year should be done to show actual equestrian parking use. Also the number of spaces needed to accommodate horse rigs and horses tied next to them should be investigated.

DM-1

DM-2

DM-3

I do not approve the City of Grover Beach plan for the Lodge 7 Conference Center or the use of State park land for this use.

DM-4

**Response to Email from Darcy Murphy, dated January 29, 2011**

<b>Comment No.</b>	<b>Response</b>
DM-1	This comment relates to the proposed location of equestrian parking in dune habitat south of Grand Avenue. Please refer to Master Response EQ-7.
DM-2	The comment challenges the results of the equestrian parking survey. Please refer to Master Response EQ-2.
DM-3	The comment states that spaces need to accommodate horse trailers and horses tied next to them. Please refer to Master Response EQ-3.
DM-4	The commenter does not support the proposed project. The commenter opposes the project and the use of state park land for this use. Refer to Master Response EQ-6 and responses to Comment Nos. PLM-1 through PLM-5, above.

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