



Air Pollution Control District  
San Luis Obispo County

June 5, 2012

Mr. Brian Pedrotti  
San Luis Obispo County Department of Planning & Building  
County Government Center  
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the Laetitia Cluster Tract 2606 & CUP  
2004-0001 NOP of an EIR. (CUP 2004-0001, Tract 2606)

Dear Mr. Pedrotti,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 453 Laetitia Vineyard Drive in Arroyo Grande.

The RDEIR consists of several revised sections of the 2008 Draft EIR, including water resources, biological resources and alternative analysis and addresses the environmental impacts that may be associated with the request to subdivide twenty-one parcels (approximately 1,910 acres) into 106 lots, including 102 residential lots for the future construction of 102 single-family homes and four open space lots. The proposed project is within the Agricultural and Rural Lands land use categories and is located approximately two miles north of Los Berros Road, between the City of Arroyo Grande and the community of Nipomo, in the South County Inland planning area of San Luis Obispo County.

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

**GENERAL COMMENTS**

On December 2, 2008 the SLOAPCD submitted comments on the 2008 EIR that was prepared for Laetitia Agricultural Cluster Subdivision. At that time, the SLOAPCD indicated several items were not adequately addressed and additional work was needed. Some of the main items discussed in the December 2<sup>nd</sup> letter include:

1. **Construction Impacts** - Total impact from construction for the entire project were not adequately addressed. The grading for the dude ranch must be included in the calculations. The applicant should make an estimate of the cut and fill volumes for that portion of the project, as was done for the residential component.
2. The construction calculations should be redone to include the dude ranch. The construction calculations should also include the drilling and construction of the new water wells.

3. **Operational Impacts** – At that time, District staff had reviewed the emission analysis for the operational phase of the project. The estimated emissions that were presented in Table V.I.-6 of the 2008 EIR appeared to underestimate the emissions for the project for the following reasons:
- It appears that the operational phase emissions were based on the traffic report and an estimated 1,234 daily trips. This number did not take into consideration the equestrian and other special events associated with the Dude Ranch, nor did it take into consideration hauling of the solids from the waste water treatment plant.
  - Due to the remote location of this project, the APCD recommends the trip distance default be 13 mile for all categories of trips. The full URBEMIS report was not included in Appendix E, so it is not possible to determine what distance was used for the modeling. However, due to the remote location of this project all trip lengths should be set to 13 miles.
  - For future reference the full URBEMIS report should also be included in EIR, not just the summary sheets.

At that time, it was recommended the operational phase emission be recalculated to address the items listed above.

4. Greenhouse gases from the project were not quantified and associated mitigation was not recommended for this project. At the time, the EIR was originally conducted in 2008 the SLOAPCD did not have adopted thresholds of significance which was referenced in the EIR, however, as referenced in the APCD's 2008 letter SB 97 did clearly define the need to quantify and mitigate GHG emissions
- o *"Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis."*
  - o *"CEQA obligates public agencies to consider less environmentally-damaging alternatives and adopt feasible mitigation measures to reduce or avoid a project's significant impacts."*
  - o *"Public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact."*

Since the time the project was originally reviewed, the SLOAPCD board has adopted CEQA thresholds for GHG emissions.

**District staff recommend prior to finalizing the EIR the above items along with all of the recommendations made in the December 2, 2008 letter be addressed (a copy of that letter is attached for your reference).**

Thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-4667.

Sincerely,



Melissa Guise  
Air Quality Specialist  
MAG/arr