Appendix A

Notice of Preparation and Responses

SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

August 14, 2014

State Clearinghouse
1400 Tenth St.
Sacramento, CA 95814

For U.S. Postal Mailing: State Clearinghouse P.O. Box 3044 Sacramento, CA 95812-3044

SUBJECT: NOTICE OF EIR PREPARATION FOR San Luis Obispo County Wide Water Program;

Enclosed are fifteen copies (paper and/or CD) of the Notice of EIR Preparation for the above referenced project. The document is being submitted to the clearinghouse for distribution in accordance with Sections 15085 or 15075 of the State CEQA Guidelines. For Notification distribution, please refer to the second page of the submittal form. If you have any questions, or need more information from us, please contact me at 805/781-5702.

Sincerely,

James Caruso

James Caruso
Project Manager

COUNTY GOVERNMENT CENTER • SAN LUIS OBISPO • CALIFORNIA 93408 • (805)781-5600
EMAIL: planning @co.slo.ca.us • FAX: (805) 781-1242 • WEBSITE: http://www.sloplanning.org

Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: San Luis Obispo County Wide Water Program

Lead Agency: County of San Luis Obispo — Contact Person: James Caruso

Mailing Address: 976 Osos Street, Room 200 — Phone: (805) 781-5702

City: San Luis Obispo — Zip: 93408-2040 — County: San Luis Obispo

Project Location: County: San Luis Obispo — City/Nearest Community: _____

Cross Streets: This project covers all of the unincorporated portions of the County — Zip Code: _____

Longitude/Latitude (degrees, minutes and seconds): ____° ____′ ____″ N / ____° ____′ ____″ W Total Acres: _____

Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: _____ Waterways: _____

Airports: _____ Railways: _____ Schools: _____

Document Type:

CEQA: ☒ NOP ☐ Draft EIR — NEPA: ☐ NOI — Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) _____ ☐ Draft EIS ☐ Other: _____
☐ Mit Neg Dec Other: _____ ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☒ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: _____

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☒ Other: County development policies and ordinances

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☒ Agricultural Land ☒ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☒ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☐ Growth Inducement
☒ Coastal Zone ☒ Noise ☐ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☐ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other: _____

Present Land Use/Zoning/General Plan Designation:

All

Project Description: *(please use a separate page if necessary)*

Attached

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

S Air Resources Board
____ Boating & Waterways, Department of
____ California Emergency Management Agency
____ California Highway Patrol
S Caltrans District #5
____ Caltrans Division of Aeronautics
____ Caltrans Planning
____ Central Valley Flood Protection Board
____ Coachella Valley Mtns. Conservancy
S Coastal Commission
____ Colorado River Board
S Conservation, Department of
____ Corrections, Department of
____ Delta Protection Commission
____ Education, Department of
____ Energy Commission
S Fish & Game Region #4
____ Food & Agriculture, Department of
S Forestry and Fire Protection, Department of
____ General Services, Department of
____ Health Services, Department of
____ Housing & Community Development
S Native American Heritage Commission
____ Office of Historic Preservation
____ Office of Public School Construction
S Parks & Recreation, Department of
____ Pesticide Regulation, Department of
S Public Utilities Commission
S Regional WQCB #Centra
____ Resources Agency
____ Resources Recycling and Recovery, Department of
____ S.F. Bay Conservation & Development Comm.
____ San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
____ San Joaquin River Conservancy
____ Santa Monica Mtns. Conservancy
____ State Lands Commission
____ SWRCB: Clean Water Grants
____ SWRCB: Water Quality
____ SWRCB: Water Rights
____ Tahoe Regional Planning Agency
____ Toxic Substances Control, Department of
S Water Resources, Department of

S Other: Fish & Wildlife, D. Hillyard
S Other: Parks: Oceano Dunes, Hearst Castle

Local Public Review Period (to be filled in by lead agency)

Starting Date August 15, 2014 Ending Date September 15, 2014

Lead Agency (Complete if applicable):

Consulting Firm: N/A
Address:
City/State/Zip:
Contact:
Phone:

Applicant:
Address:
City/State/Zip:
Phone:

Signature of Lead Agency Representative: James Caruso **Date:** 8/14/14

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

NOTICE OF PREPARATION – DRAFT ENVIRONMENTAL IMPACT REPORT

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600
Promoting the Wise Use of Land • Helping to Build Great Communities

DATE: August 14, 2014

TO: Interested Parties and Agencies

FROM: Department of Planning and Building
976 Osos Street, Room 200
San Luis Obispo, CA 93408-2040

PROJECT TITLE: **San Luis Obispo County Wide Water Program**

PROJECT APPLICANT: **County of San Luis Obispo**

RESPONSES DUE BY: **September 15, 2014**

The County of San Luis Obispo is the lead agency for the County's County Wide Water Program (Program) and will prepare a supplement (SEIR) to the certified environmental impact report, for the County's 2010 Conservation and Open Space Element, for the program described in the attached project description. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the project. If you are not a government agency, the following is for your informational purposes only. Your comments are welcomed, but not required.

Please provide us the following information at your earliest convenience, but not later than the 30-day comment period, which began with your agency's receipt of the Notice of Preparation (NOP).

1. NAME OF CONTACT PERSON. Please include address, e-mail, and telephone number.
2. PERMIT(S) or APPROVAL(S) AUTHORITY. Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.
3. ENVIRONMENTAL INFORMATION. What environmental information must be addressed in the EIR to enable your agency to use this documentation as a basis for your permit issuance or approval?
4. PERMIT STIPULATIONS/CONDITIONS. Please provide a list and description of standard stipulations (conditions) that your agency will apply to features of this project. Are there other conditions that have a high likelihood of application to a permit or approval for this project? If so, please list and describe.
5. ALTERNATIVES. What alternatives does your agency recommend be evaluated in the EIR?

6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS, or PLANS. Please name any future projects, programs, or plans that you think may have an overlapping influence with the project as proposed.

7. RELEVANT INFORMATION. Please provide references for any available, appropriate documentation you believe may be useful to the County in preparing the SEIR. Reference to and/or inclusion of such documents in an electronic format would be appreciated.

8. FURTHER COMMENTS. Please provide any further comments or information that will help the County scope the document and determine the appropriate level of environmental assessment.

The project description, location, and the potential environmental effects are contained in the attached materials.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date, **but not later than 30 days after receipt of this notice**.

Please send your response to James Caruso at the address shown above. As requested above, we will need the name for a contact person in your agency. If you have any questions regarding the NOP or the proposed project, please contact James Caruso at jcaruso@co.slo.ca.us or (805) 781-5702.

In addition, an EIR scoping meeting will be held on August 27, 2014, from 6:00 p.m. to 8:00 p.m at the Library Community Room (995 Palm Street) in San Luis Obispo, California. Sessions will be open to all interested parties and provide an opportunity for input relating to the scope and content of the EIR.

James Caruso
County of San Luis Obispo
Department of Planning and Building

Reference: California Administrative Code, Title 14, Section 15082

Attachments

A – Project Description and Potential Environmental Impacts
B – County Map, Key Groundwater Basins

Attachment A – Project Description and Potential Environmental Impacts

BACKGROUND

Water in San Luis Obispo County

The County of San Luis Obispo is in the midst of an "exceptional drought" that has lowered water levels in our surface lakes and reservoirs, and in our groundwater basins. The Board of Supervisors has declared three groundwater basins, Nipomo Mesa (part of Santa Maria Groundwater Basin), the Los Osos Groundwater Basin, and the Paso Robles Groundwater Basin, at Level of Severity (LOS) III, which indicates that groundwater demand has met or exceeded the dependable supply.

Existing Water Programs

New development in Los Osos is required to offset water usage at a 2:1 ratio through plumbing retrofits. The Paso Robles Groundwater Basin Urgency Ordinance, passed on August 27th 2013, requires new development and new irrigated agriculture to offset new water use at a 1:1 ratio. The County developed a plumbing retrofit program to generate offset credits for new residential development, and a program to facilitate water offsets for new irrigated agriculture is underway. The urgency ordinance will expire in August of 2015.

Authorized Amendments

The County Wide Water Program includes amendments to the General Plan and County ordinances that will affect water use in both new and existing development, and agricultural operations. Adoption of the Water Neutral New Development program will require all new development, including new irrigated agriculture, in areas with LOS III to offset new water usage so that its water demand is less than or equal to the pre-development land use. Water-neutral new development is proposed in areas of the unincorporated county with a Level of Severity III for water supply (including, but not necessarily limited to, the Paso Robles Groundwater Basin, the Los Osos Groundwater Basin, and the Nipomo Mesa portion of the Santa Maria Groundwater Basin). In addition, there is a proposed Water Waste Prevention Ordinance that will apply to irrigated agriculture, and all unincorporated county areas where a water provider does not already perform this function.

Your input is requested to help guide development of the Program and frame the scope of the supplement EIR.

PROJECT DESCRIPTION

Water Neutral New Development

Ordinance and Policy Document Revisions

The Program consists of revisions to the Inland Land Use Ordinance (LUO), Title 22 of the County Code, the Coastal Zone Land Use Ordinance (CZLUO), Title 23 of the County Code and the Coastal Zone Land Use Element. The Program also proposes revisions to the Agriculture Element, and the Conservation and Open Space Element (COSE). These will include Ag Goal 1d, Ag policies 10 and 11 and several water policies of the COSE.

Current Requirements

Two areas of the County currently have Water Neutral New Development requirements: the community of Los Osos, and the area overlying Paso Robles Groundwater Basin. In Los Osos, a Retrofit-to-Build requirement in Title 19 requires that builders must retrofit plumbing fixtures in existing homes in order to save twice the amount of water their new development will use. Builders submit verification to the County that the retrofits have been completed.

The Paso Robles Groundwater Basin Urgency Ordinance, passed on August 27th 2013, required new development and new irrigated agriculture overlying the basin to offset new water use at a 1:1 ratio. Applicants comply with this requirement by purchasing offset credits from a County-run program, which retrofits plumbing fixtures in existing homes. Both Los Osos and the Paso Robles Groundwater Basin have standard water offset amounts based on the type of development proposed, current Cal Green standards, and the average household size for the area.

Additionally, the urgency ordinance requires new irrigated agriculture in the Paso Robles Groundwater Basin to offset water use. Currently, the County can approve offset requests when new planting is replacing existing planting on the same site. For example, if a farmer is growing a high water using crop such as alfalfa they can choose to replace the alfalfa with a lower water using crop such as vineyards. The County is working with the Upper Salinas Las Tablas Resource Conservation District to develop an Agricultural Offset Program, which will facilitate the exchanging water offset credits between different parcels and different land owners. The program must consider many factors, including the proximity of the two parcels and the impact of new water use on neighboring wells. The urgency ordinance will expire on August 27, 2015.

Proposed requirements

The proposed amendments would require that new development and new irrigated agriculture offset new water use at a minimum 1:1 ratio.

Specific Offset Methods

Achieving Water Neutral New Development will require multiple programs designed to achieve verifiable and measurable water savings. Some options include:

Plumbing retrofits

Retrofitting plumbing fixtures in existing buildings results in measurable water savings. Specifically, replacing older, higher water using toilets and showerheads with more efficient fixtures will save specific amounts of water each day. For example, replacing a 3.5 gallon per flush (gpf) toilet with a 1.28gpf toilet will save 2.22 gallons with every flush. Replacing toilets and showerheads is the most reliable way to achieve water savings. Additional measures, such as water pressure adjustments and installing hot water recirculation systems also save water, but savings from these measures are more difficult to quantify.

Reducing Outdoor Water Use

In some areas of the County, such as in the Paso Robles Groundwater Basin, outdoor water use accounts for the majority of residential water use. Removing turf or other water intensive landscaping can save water. Many cities in California incentivize removal of water intensive landscaping by offering a dollar amount per square foot of lawn removed. New development applicants could potentially achieve the water savings they need by paying into a program that would fund incentives and/or provide assistance for existing development to convert to water efficient landscaping. This type of program would need to assign standard water usage rates for landscaping, or rely on licensed landscape architects to calculate water savings. The program would also place restrictions on the type and amount of landscaping that can be used as a replacement.

More Efficient Irrigation

Improving irrigation efficiency can save water by preventing water loss to overwatering, leaks, or evaporation. An irrigation efficiency program for offsets could allow new development applicants to pay for efficiency improvements for existing irrigated agriculture. This type of program would need to be carefully developed to ensure that efficiency improvements are applied and verified.

Transferring Water Credits between Landowners

The County is working with the Upper Salinas – Las Tablas Resource Conservation District to develop an Agricultural Water Offset program in the Paso Robles Groundwater Basin. The program will allow a potential grower on currently vacant land to purchase water credits from a grower willing to reduce or eliminate existing crops or switch to a less water intensive crop on their land. This program will likely

be expanded to apply to other areas in LOS III. All agricultural water credit transactions would be closely evaluated to ensure the water credit is in close enough proximity to the new water use.

Water Waste Prevention Ordinance

Overview

A water waste prevention ordinance would prohibit certain uses of water deemed to meet the definition of water wasting. In urban areas this may include hosing down hardscapes, using a hose without a shut-off nozzle, allowing landscape irrigation systems to water beyond property lines or onto sidewalks, or failure to repair leaks. In Agricultural areas the definition of water waste might include inefficient irrigation practices, leaking pipes, and other activities defined as water wasting. The County is working with members of the agricultural community to determine what can reasonably be considered an inefficient use of water.

County Ordinances and Policy Documents

Titles 22 and 23 and/or Title 5 of the County Code will be revised to include this proposed water waste ordinance. Portions of the County General Plan including the Agriculture Element and the Conservation and Open Space Element will be revised to reflect the policy basis for agriculture, rural and urban area water waste.

Proposed Requirements

The proposed ordinance would prohibit certain activities defined as water wasting. These activities, in urban and rural areas, could include such things as:

- Application of water to outdoor landscapes in a manner that causes runoff such that water flows off the site, into non-irrigated areas, public and private walkways, roadways, parking lots, structures or other hardscaped areas.
- Use of a hose to wash an automobile or other vehicle except where the hose is fitted with an automatic shut off nozzle or device attached to it that causes it to cease dispensing water when not in use.
- Application of water to hard surfaces, including but not limited to, driveways, sidewalks, unpaved walkways and any other hardscaped area.
- Use of potable water in a fountain or other decorative water feature.
- Application of water to outdoor landscape more than 3 times per week.

The proposed ordinance would prohibit certain activities defined as water wasting in agricultural areas. These activities could include such things as:

- Application of water to irrigated crops in a manner that causes spray or runoff such that water flows off the site.

- Application of water to hard surfaces, including but not limited to, driveways, sidewalks, unpaved walkways, areas that are not planted and any other hardscaped area.

Under a Water Waste Prevention Ordinance, property owners violating the terms of the ordinance could be subject to fines. The ordinance would include a provision for a system to report violations and to gain compliance when property owners are found to be in violation. This may include a warning system followed by fines for ongoing offenses.

POTENTIAL ENVIRONMENTAL EFFECTS

Listed below are the environmental resource areas that will be evaluated in the SEIR:

- **Aesthetics.** Scenic areas, open spaces, rural landscapes, vistas, country roads, and other factors interact to produce a net visual benefit for individuals or communities within the county. This section will assess the degree to which water neutral new development and water waste prevention ordinances and the related programs may result in changes to viewsheds.

- **Agricultural Resources.** Agriculture is an important part of San Luis Obispo County's economy, and the preservation of agricultural land is a major priority for the County. A recent study found that agriculture contributes $1.87 billion annually to the county's economy (Agricultural Impact Associates 2013). The county's diverse agriculture production includes over 100 different crops, with fruits and vegetables the largest sector. Requiring new irrigated agriculture to offset water usage could positively and/or negatively affect the County's efforts to support agricultural preservation and a prosperous agricultural economy. The prohibition of certain activities determined to be water wasting could change copping patterns, irrigation practices and agricultural management.

- **Air Quality and Greenhouse Gas Emissions.** This section will assess potential effects from construction and operational emissions, including fugitive particulate matter from potentially limiting the application of groundwater as a form of dust control, reduced irrigation, and/or fallowing of agricultural lands. This section will also identify potential sources of greenhouse gas emissions as well as the greenhouse gas reduction benefits of these projects under the Program.

- **Biological Resources.** The unincorporated county area supports a wide range of important and sensitive species and habitat types. Over 50 species listed under the federal or state Endangered Species Acts are known to occur or have the potential to occur in the county. Examples include the Morro shoulderband snail, vernal pool fairy shrimp, San Joaquin kit fox, Nelson's antelope squirrel, giant kangaroo rat, blunt-nosed leopard lizard, California tiger salamander, California condor, and several plants. Changes to undeveloped agricultural and residential land or changes to existing agricultural lands, and the incidental increase in non-native weeds or

invasive plants located in areas supporting sensitive biological resources could result in impacts to biological resources.

- **Cultural Resources.** Cultural resources can reflect the history, diversity, and culture of the region and people who created them. They are unique in that they are often the only remaining evidence of the activity that occurred historically.

- **Geology and Soils.** This section will focus on the potential for the County-wide water program to result in soils- and geologic-related impacts and possible loss of access to mineral resources. Issues could include liquefaction potential, landslide risk potential, erosion, soil suitability, and earthquake damage potential.

- **Hazards and Hazardous Materials.** This section will address the Program's potential to result in the use or transport of hazardous materials or result in other hazardous conditions such as exposure to risk of wildfire or increased exposure to Valley Fever. The Program does not contemplate the use of any sites contained on the State's "Cortese" list, or other lists of hazardous waste sites maintained by the California Environmental Protection Agency as enumerated under Section 65962.5 of the Government Code.

- **Land Use.** This section will examine how the Program's resulting changes to County planning documents may indirectly affect land use in the county and potentially result in adverse land use conflicts. The program could change the nature or amount of development in areas with water scarcity.

- **Noise.** This section will assess potential noise effects from implementation of the County Wide Water Program.

- **Population and Housing.** This section will address the potential for the Program to result in substantial changes to population or housing dynamics in the county. Requiring water neutral new development could limit new housing development in certain areas of the County.

- **Public Services and Utilities.** This section will assess effects on demand for public services and utilities from implementation of the Program, including water, sewer, solid waste, roads, and fire and police services.

- **Recreation.** This section will assess effects on demand for parks and recreation opportunities, as well as the potential for the Program to indirectly affect access and enjoyment of trails and other recreation areas.

- **Transportation and Circulation.** This section will address the potential effects of traffic associated with the County-wide Water Program, including whether the Program may indirectly result in impacts to emergency access or air traffic patterns and safety issues.

- **Water and Hydrology.** This section will address issues of water availability, surface water runoff, drainage patterns, groundwater impacts, and flooding risk.

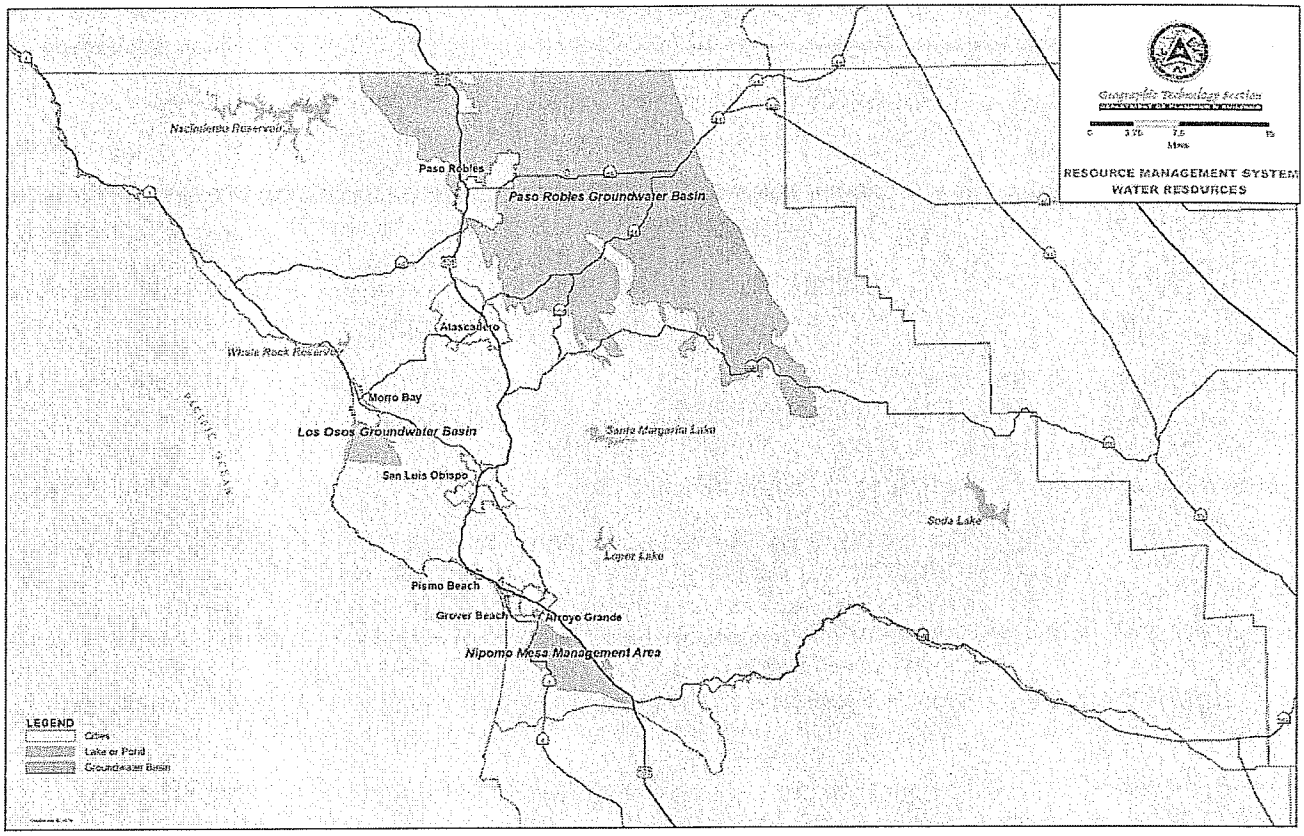
MITIGATION MEASURES

Mitigation measures will be identified in the SEIR to reduce any potentially significant impacts to less than significant levels where possible.

PROJECT ALTERNATIVES

As necessary, a reasonable range of project alternatives, including the CEQA-mandated "No Project" Alternative, will be developed and evaluated in the SEIR. The County welcomes input regarding the development of feasible project alternatives that meet the basic objectives of the project, while potentially reducing its environmental impacts.

Attachment B – County Map, Key Groundwater Basins



PUBLIC NOTICE
ENVIRONMENTAL IMPACT REPORT SCOPING MEETING

WHO: County of San Luis Obispo Department of Planning and Building

WHAT: A Scoping Meeting for a Supplemental Environmental Impact Report (SEIR) for the proposed San Luis Obispo County Wide Water Program (LRP2013-00012). A Scoping Meeting is an opportunity for agencies and interested members of the public to obtain information about the project and provide input on the issues that will be analyzed in the SEIR.

The County Wide Water Program includes amendments to the General Plan and County ordinances that will affect water use in both new and existing development, and agricultural operations. Adoption of the Water Neutral New Development program will require all new development, including new irrigated agriculture, in areas with LOS III to offset new water usage so that its water demand is less than or equal to the pre-development land use. Water-neutral new development is proposed in areas of the unincorporated county with a Level of Severity III for water supply (including, but not necessarily limited to, the Paso Robles Groundwater Basin, the Los Osos Groundwater Basin, and the Nipomo Mesa portion of the Santa Maria Groundwater Basin). In addition, there is a proposed Water Waste Prevention Ordinance that will apply to irrigated agriculture, and all unincorporated county areas where a water provider does not already perform this function.

If you need more information about this project, please contact James Caruso at jcaruso@co.slo.ca.us or (805) 781-5702.

WHEN: The meeting will be held Wednesday, August 27, 2014 from 6:00 to 8:00 pm

WHERE: The location of the meeting will be in the Community Room at the City/County Library – 995 Palm Street (at Osos Street), San Luis Obispo.

DATED: August 14, 2014

MARTI FISHER
Environmental Administrative Assistant

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471

Edmond G. Brown, Jr., *Governor*

RECEIVED
AUG 25 2014
PLANNING & BUILDING

August 21, 2014

James Caruso
San Luis Obispo County
976 Osos Street, Room 200
San Luis Obispo, CA 93408-2040

RE: SCH# 2014081056 San Luis Obispo County Wide Water Program, San Luis Obispo County.

Dear Mr. Caruso:

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

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

Sincerely,

Gayle Totton
Associate Government Program Analyst

CC: State Clearinghouse

Native American Contacts
San Luis Obispo County, California
August 21, 2014

Beverly Salazar Folkes
1931 Shadybrook Drive — Chumash
Thousand Oaks CA 91362 — Tataviam
folkes9@msn.com — Ferrnandeño
(805) 492-7255
(805) 558-1154 Cell

Judith Bomar Grindstaff
63161 Argyle Road — Salinan
King City , CA 93930
(831) 385-3759-home

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

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

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennslie, Chair
365 North Poli Ave — Chumash
Ojai , CA 93023
jtumamait@hotmail.com
(805) 646-6214

Peggy Odom
1339 24th Street — Chumash
Oceano , 93445
(805) 489-5390

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

Salinan Tribe of Monterey, San Luis Obispo
Patty Dunton, Tribal Administrator
7070 Morro Road, Suite A — Salinan
Atascadero , CA 93422 — Chumash
salinantribe@aol.com
(805) 460-9202
(805) 235-2730 Cell
(805) 460-9204

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

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

This list s only applicable for contacting locative Americans with regard to cultural resources for the proposed San Luis Obispo County Wide Water Program; located in San Luis Obispo County, California.

Native American Contacts
San Luis Obispo County, California
August 21, 2014

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

Salinan Nation Cultural Preservation Association
Robert Duckworth, Environmental Coordinator
4777 Driver Rd. Salinan
Valley Springs CA 95252
dirobduck@thegrid.net
(831) 578-1852

Randy Guzman - Folkes
4676 Walnut Avenue Chumash
Simi Valley , CA 93063 Fernandeño
ndnRandy@yahoo.com Tataviam
(805) 905-1675 Cell Shoshone Paiute
(805) 520-5915 Fax Yaqui

Coastal Band of the Chumash Nation
Michael Cordero, Chairperson
P.O. Box 4464 Chumash
Santa Barbara CA 93140
CbcnTRIBALCHAIR@gmail.com
(805) 689-9528

Xolon-Salinan Tribe
Johnny Eddy, Council Chairperson
950 Coral Ridge Circle Salinan
Rodeo , CA 94572
(831) 210-9771

yak tityu tityu - Northern Chumash Tribe
Mona Olivas Tucker, Chairwoman
660 Camino Del Rey Chumash
Arroyo Grande CA 93420
olivas.mona@gmail.com
(805) 489-1052 Home
(805) 748-2121 Cell

Salinan Nation Cultural Preservation Association
Cultural Resources Coordinator
P.O.Box 56 Salinan
Lockwood , CA 93932
fabbq2000@earthlink.net

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

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This list s only applicable for contacting locative Americans with regard to cultural resources for the proposed San Luis Obispo County Wide Water Program; located in San Luis Obispo County, California.

Native American Contacts
San Luis Obispo County, California
August 21, 2014

Santa Ynez Band of Mission Indians
Tribal Admin/Counsel Sam Cohen
P.O. Box 517 Chumash
Santa Ynez , CA 93460
info@santaynezchumash.org
(805) 688-7997
(805) 686-9578 Fax

Frank Arredondo
P.O. Box 161 Chumash
Santa Barbara CA 93102
ksen_sku_mu@yahoo.com

Salinan Nation Cultural Preservation Association
Gregg Castro, Administrator
5225 Roeder Road Salinan
San Jose , CA 95111
glcastro@pacbell.net
(408) 219-2754

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation ConsInt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
freddyromero1959@yahoo.com
(805) 688-7997, Ext 37

Salinan-Chumash Nation
Xielolixii
3901 Q Street, Suite 31B Salinan
Bakersfield , CA 93301 Chumash
(408) 966-8807 Cell

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive Chumash
Rancho Pales , CA 90275
Verdes
(310) 831-5295

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

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
(805) 987-5314

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Native American Contacts
San Luis Obispo County, California
August 21, 2014

Coastal Band of the Chumash Nation
Janet Darlene Garcia
P.O. Box 4464 Chumash
Santa Barbara CA 93140
(805) 689-9528

Coastal Band of the Chumash Nation
Crystal Baker
P.O. Box 723 Chumash
Atascadero , CA 93423
(805) 466-8406

PeuYoKo Perez
11465 Nardo Street Chumash
Ventura , CA 93004
grndowl4U@yahoo.com
(805) 231-0229 Cell

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

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

This list s only applicable for contacting locative Americans with regard to cultural resources for the proposed San Luis Obispo County Wide Water Program; located in San Luis Obispo County, California.

Upper Salinas-Las Tablas Resource Conservation District

65 S. Main St. Ste. 107 Templeton, CA 93465 | 805.434.0396 x 5 | www.us-ltrcd.org

September 11, 2014

James Caruso
County of San Luis Obispo
Department of Planning and Building
976 Osos Street
San Luis Obispo, California 93406

RE: NOTICE OF PREPARATION – DRAFT ENVIRONMENTAL IMPACT REPORT for San Luis Obispo County Wide Water Program

Dear Mr. Caruso,

The Upper Salinas – Las Tablas Resource Conservation District (USLTRCD) has received a letter dated August, 14, 2014 for the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) for the San Luis Obispo County Wide Water Program. The County of San Luis Obispo is planning to prepare a Supplemental Environmental Impact Report (SEIR) to the County's 2010 Conservation and Open Space Element. San Luis Obispo County (hereafter referred to as "County"), proposes several water related programs throughout the county in response to an "exceptional drought" which has lowered water levels in lakes, reservoirs, and groundwater basins. The Nipomo Mesa, Los Osos Groundwater Basin, and the Paso Robles Groundwater Basin have been declared at Level of Severity (LOS) III, which indicate groundwater demand has met or exceeded dependable supply. The County proposes to adopt two new ordinances and policy document revisions: 1) Water Neutral New Development; and b) Waste Water Prevention Ordinance.

USLTRCD's mission is to, "Provide services and education to landowners supporting their management and stewardship of soil, water and natural resources". As such, USLTRCD works closely with landowners, primarily agricultural producers, in North County and the North Coast regions of San Luis Obispo County. Under Title 22 of the County Code, the Alternative Review Program (ARP) is one program USLTRCD has authority to issue permits for agricultural practices. These practices included, but not limited to, agricultural roads, ponds, grading, streambank restoration, waste water management systems, etc. Therefore, USLTRCD has vested interest in the County's development and adoption of these two aforementioned ordinances and policy revisions.

In the NOP, a list of eight items were asked to be provided in any response. Below is the information requested.

1. Devin Best, Executive Director
   Upper Salinas – Las Tablas Resource Conservation District
   65 S. Main Street
   Templeton, California 93465
   devin@us-ltrcd.org
   (805) 434-0396 ex. 5

2. Alternative Review Program (ARP) under Title 22 under County Code. USLTRCD administers permits for grading practices, primarily agricultural.

3. For the development of the EIR, the County should address agricultural ponds and any environmental impacts related to constructing those within the LOS III groundwater basins.

4. For the Water Offset Program, several recommendations for stipulations have been made. Of these, flow meters, deed restrictions, third party monitoring, proximity analysis should be incorporated in the EIR. Consequently, since USLTRCD has authority to issue permits under ARP via the County's Grading Ordinance, any permitted activity USLTRCD has under ARP should be incorporated in the SEIR. The emergency ordinance issued by the Board of Supervisors on August 27, 2013, changed the way ARP functioned. Until the County completes the SEIR, certain practices, such as development of agricultural ponds, are prohibited with the Paso Robles Groundwater Basin.

5. USLTRCD recommends the County evaluate other alternatives that improve water supply and availability. First of all, the County, in development of the DEIR, should evaluate a suite of alternatives beyond the scope of what is presented in this NOP. The two ordinances and policy revisions do not restore the function and condition of lakes, reservoirs, and groundwater basins in the county. Instead, the programs curtail or prevent future decline. USLTRCD recognizes this is an important initial step in developing long-term planning and sustainability, however, it is limited in scope. USLTRCD does recommend the County identify and evaluate other water conservation measures to incorporate into the ordinances that will improve water supply and availability for domestic, agricultural, and recreational use. The Paso Robles Groundwater Basin (PRWGB) Committee is currently developing a list of measures specific to remediating the Paso Robles Groundwater Basin. The County should coordinate and collaborate with the committee to include and adopt a strategic and comprehensive resolution to the Paso Robles Groundwater Basin. Other practices such as xeriscaping, rain barrels, rain gardens, etc. could be recommended for both urban and rural development to reduce the demand for water. As stated in the NOP, a majority of residential water use is for outdoor landscaping. Building resiliency and self-sufficiency in throughout the county should be the goal of any water use county wide ordinance in San Luis Obispo County.

6. None to recommend at this time.

7. None to recommend at this time.

8. Consequently, other areas within the county such as Cambria, should not be overlooked when evaluating the impacts of the proposed ordinances and policy revisions. The NOP is for county wide installation of these ordinances and policy revisions, yet the focus is on existing and new development, as well as agricultural operations, in LOS III areas. The County should extend its evaluation an analysis beyond these specific groundwater basins to determine how implementing these ordinances will affect rural residential and agricultural production throughout the county.

As a lead agency on the development of the Agriculture Water Offset Program, administers of ARP, and collaborate with multiple stakeholder groups in North Coast and North County, we look forward to continuing to provide technical expertise and input into the development of the County Wide Water Program.

Sincerely,

Devin Best
Executive Director

cc: Supervisor Gibson, Chair
Supervisor Mecham, Vice Chair
Supervisor Arnold
Supervisor Ray
Supervisor Hill

PLANNING & BUILDING
COUNTY OF SAN LUIS OBISPO

County Comment Form

Proposed General Plan Amendments: Water Neutral New Development and Ag Water Waste Prevention

Date: 9/11/2014

Name*: Joseph R. Rouleau

Affiliation (*if any*):* None

Address:* 6515 Malik Lane

City, State, Zip Code:* San Luis Obispo, CA 93401

Telephone Number:* Home (805-783-2855) Cell (805-440-8354)

Email:* JRROULEAU@SBCGLOBAL.NET

Comment: Several times during the August 27th meeting, staff members were asked if they would be reporting on a particular issue in their report or looking at and/or commenting on negative areas of the proposed water management plan and they commented that they were not asked to look into the particular issue. It seems that while doing complete staff work, they should be commenting to the Supervisors in areas of the Supervisor's plan that do not make sense. Apparantly not.

The water shortage issue is not a "permanent" problem and is cyclical in nature. Therefore, a permanent plan to deal with a problem that in theory will not exist half the time seems ludicrous. The plan should be another temporary one such as the one in existence. A permanent plan by Supervisors with a particular agenda will be unnecessary in years to come with a Board of Supervisors with the opposite agenda. NOTHING IN LIFE IS CERTAIN OR PERMANENT, and the proposed plan should reflect that fact and deal with the temporary problem with a temporary but renewable plan.

**Please print. Your name, address, and comments become public information and may be released to interested parties if requested.*

Please either deposit this sheet at the sign-in table before you leave today, or fold, stamp, and mail. Insert additional sheets if needed. Comments must be received by September 15th, 2014. Comments may also be faxed to (805) 781-5624 or emailed to jcaruso@co.slo.ca.us.

CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV

September 12, 2014

James Caruso
San Luis Obispo County Department of Planning and Building
County Government Center
San Luis Obispo, CA 93408

Subject: San Luis Obispo County-Wide Water Program Notice of Preparation-Draft Environmental Impact Report

Dear Mr. Caruso:

Thank you for providing the opportunity to review and comment on the Notice of Preparation of a Draft Environmental Impact Report pertaining to the San Luis Obispo County-Wide Water Program (Program). The Program seeks to amend certain provisions within Title 23 of the Coastal Zone Land Use Ordinance, which is the County's certified Local Coastal Program's (LCP) Implementation Plan (IP). Therefore, any amendment to Title 23 requires certification by the Coastal Commission, with the policies of the LCP's Land Use Plan (LUP) as the legal standard of review. Commission staff would like to share the following observations and suggestions.

As you know, water supply is a critical issue within much of San Luis Obispo County, including coastal zone communities such as Cambria and Los Osos. In addition, the Coastal Act and County LCP require that the issuance of all coastal development permits (CDPs) include findings that public services, including water, are adequate to serve the proposed development. As such, we are generally supportive of the Program's basic intentions of requiring water usage offsets at a minimum of 1:1 for new development as a way to ensure that the adequacy of services can be found. However, we have a few concerns with the offset approach that we hope will be addressed in the EIR.

First, it is important to note that retrofitting can only go so far towards conserving water, and is essentially ineffective in situations of severe drought and severe water supply shortages. Indeed, the success of this Program is limited by the finite number of non-retrofitted homes, businesses and other un-retrofitted facilities remaining. In 2008, the Commission certified an LCP amendment updating the North Coast Area Plan (NCAP). Pages 3-14 of the NCAP state that, "one consequence of building regulations and retrofit programs that require low water use plumbing fixtures is that a community's ability to respond to a drought becomes somewhat diminished." Thus, "the more efficiently a community uses its water on a day-to-day basis, the less flexibility it has to respond to a severe drought." Since the proposed Program would only apply to areas with a designation of Level of Service (LOS) III (meaning that water demand already meets or exceeds dependable supply), we are concerned that the Program's utility may be futile because water supply in LOS III areas is already severely constrained. Instead, the Program may be more effective in areas of the coastal zone with LOS I and II designations, where stringent requirements on water usage may help to institute efficient water practices and

prolong available supply. Therefore, we recommend that the EIR study the potential impact of instituting this program coastal zone-wide, and how/if such a program would help ensure that water supply remains viable in LOS I and II designated areas. For example, it would be helpful to understand whether a retrofit program would prolong water supply in these areas, and therefore extend the time before the water supply LOS would be downgraded (i.e. by encouraging more efficient usage of available water supply and therefore the time that an area is deemed to be in LOS I).

Second, we recommend that the EIR study the potential impacts the Program may have on growth, including whether the water offset program would allow for increased development potential. For example, we recommend the EIR study whether a water offset requirement would allow more development to be found consistent with applicable LCP public service requirements because the the offset provision would be cited as a de facto concurrence with adequacy of services policies (i.e. findings that a proposed development's water usage offsets to pre-project conditions results in no impacts to water supply). We recommend that the actual proposed amendments include language clarifying that water offsets do not in and of themselves establish adequacy of services and development entitlements. Furthermore, we recommend the LCP amendment include strong policy language clarifying that, in areas with LOS III designations, new development shall be prohibited, and only certain development such as Coastal Act and LCP priority uses and/or infill development may be allowed and only if water usage is entirely offset. This way, new development in areas with existing water supply constraints will not inappropriately be found consistent with LCP provisions simply because they are not increasing water supply inadequacy. We recommend the EIR study and analyze these alternative policy scenarios.

Finally, we recommend the EIR study the Program's potential impacts to agricultural production. As mentioned on Page 7 of the NOP, "requiring new irrigated agriculture to offset water usage could positively and/or negatively affect the County's efforts to support agricultural preservation and a prosperous agricultural economy. The prohibition of certain activities determined to be water wasting could change cropping patterns, irrigation practices and agricultural management." Agriculture is a priority land use under both the Coastal Act and the LCP, which both strictly limit the allowable uses, land divisions, and conversions of agricultural land to non-agricultural uses. We recommend the EIR study the potential implications of the Program's ability to provide water to agricultural lands, and whether such a Program would result in the infeasibility of agricultural uses in parts of the coastal zone, thereby potentially allowing for its conversion to non-agricultural uses such as residential, commercial, and industrial development.

These are preliminary comments, and we hope to continue to work with the County on the amendment in the local planning process, thereby increasing the likelihood that the amendment can be approved by the Coastal Commission as submitted. If you would like to discuss the suggested language, please do not hesitate to contact me at the address and phone number listed above.

Sincerely,

Kevin Kahn
District Supervisor, LCP Planning
Central Coast District Office
California Coastal Commission

Grower Shipper
ASSOCIATION
of Santa Barbara and San Luis Obispo Counties

September 15, 2014

Submitted electronically to jcaruso@co.slo.ca.us

Re: San Luis Obispo County Wide Water Program SEIR Scope and Content

Dear Mr. Caruso:

Thank you for the opportunity to review and comment on the scope of the Supplemental EIR. The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents over 160 growers, shippers, farm labor contractors, and supporting agribusinesses. Our members grow diverse row crops such as broccoli, strawberries, lettuce, celery, nursery products, field flowers, and wine grapes. The Association's mission is to maintain a vibrant agricultural industry in the counties of Santa Barbara and San Luis Obispo by assisting our members to address challenges and capitalize on strengths and opportunities.

We continue to have grave concerns with the County's direction of regulating agricultural water use through land use mechanisms. These may have a significant impact on the future vitality of agriculture in the County, particularly if the proposed requirements are extended beyond areas that are Level of Severity III or if additional agricultural areas are declared to be Level of Severity III.

Potential Environmental Impacts to Consider in Scoping:

- **Conversion of Farmland and Open Space.** We have concerns that the proposed program may result in the conversion of existing farmland and open space to new urban uses. The potentially significant impacts to resources include aesthetics; agricultural resources; changes to hydrological drainage patterns and recharge; growth induction; altering the rural character of the County; and cumulative impacts.

Project Alternatives:

- One project alternative being considered is a 1:1 offset for new development and irrigated agriculture. The development and agricultural components should be considered separately, as the impacts they encompass will be distinct. Higher offset ratios will also likely result in different impacts than lower offset ratios.
- Due to the potentially significant impacts and inability to mitigate these impacts, we ask that the preferred alternative for an agricultural water neutral new development or water waste provision be the "No Project" alternative.

Relevant Information:

- The role of pending groundwater legislation and groundwater basin adjudication or management mechanisms such as those being explored in the Paso Robles basin should be considered.

We remain very engaged in the future availability of water resources for agriculture in San Luis Obispo County.

Sincerely,

Claire Wineman

Claire Wineman
President

GROWER-SHIPPER ASSOCIATION OF SANTA BARBARA AND SAN LUIS OBISPO COUNTIES
245 Obispo Street • P.O. Box 10 • Guadalupe, CA 93434 • (805) 343-2215

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SLO COUNTY apcd | Air Pollution Control District
San Luis Obispo County

June 20, 2014

James Caruso,
County of Planning and Building
Government Center
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the County of SLO Water Resources Amendments Project Referral (LRP2013-00012)

Dear Mr. Caruso,

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 five program amendments dealing with countywide water resources. We have the following comments regarding these programs.

1. County ordinance for new landscaping requirements for new construction projects
2. Retrofit on sale ordinance
3. Offsetting new water demand
4. Water waste ordinance
5. Water supply assessment ordinance

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each.

There is considerable evidence that suggests that water-related energy consumption is substantial. The water use cycle is the aggregation of water management activities from point of collection or production, to point of use, and then to disposal or reuse. Energy is required for handling the water at every point in the cycle. A reduction in the use of water through a variety of programs or ordinances (as sited above) can reduce the associated energy use and result in less air pollution and greenhouse gases.

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

Sincerely,

Melissa Guise

Melissa Guise
Air Quality Specialist

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T 805.781.5912 F 805.781.1002 W slocleanair.org 3433 Roberto Court, San Luis Obispo, CA 93401