RESOLUTION NO: 09-022

A RESOLUTION OF THE PLANNING COMMISSION
OF THE CITY OF EL PASO DE ROBLES
APPROVING A MITIGATED NEGATIVE DECLARATION FOR
PLANNED DEVELOPMENT 09-001
(SPECIALTY SILICONE)
APN: 025-453-001

WHEREAS, Planned Development 09-001 has been submitted by Oasis Associates on behalf of Specialty Silicone, requesting to construct a 103,524 square foot facility located at 3077 Rollie Gates Drive; and

WHEREAS, at its August 11, 2009 meeting, the Planning Commission held a duly noticed public hearing on the Project, to accept public testimony on the proposal including Planned Development 09-001 and related applications; and

WHEREAS, pursuant to the Statutes and Guidelines of the California Environmental Quality Act (CEQA), and the City's Procedures for Implementing CEQA, an Initial Study was prepared and circulated for public review and comment; and

WHEREAS, based on the information and analysis contained in the Initial Study (Attached as Exhibit A), a determination has been made that the proposed Project qualifies for adoption of a Mitigated Negative Declaration; and

WHEREAS, Public Notice of the proposed Mitigated Negative Declaration was given as required by Section 21092 of the Public Resources Code; and

WHEREAS, based on the information contained in the Initial Study prepared for this project and testimony received as a result of the public notice, the Planning Commission finds no substantial evidence that there would be a significant impact on the environment based on the attached Mitigation Agreement and mitigation measures described in the initial study and contained in the resolution approving PD 09-001 as site specific conditions summarized below.

Topic of Mitigation	Condition #
Air Quality	5
Traffic	8,9
Water	10

NOW, THEREFORE, BE IT RESOLVED, by the Planning Commission of the City of El Paso de Robles, based on its independent judgment, to approve a Mitigated Negative Declaration for Planned Development 09-001 in accordance with the California Environmental Quality Act.

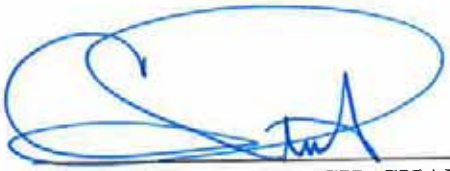
PASSED AND ADOPTED THIS 11th day of August, 2009 by the following roll call vote:

AYES: Peterson, Gregory, Nemeth, Holstine, Garcia, Treatch

NOES: None

ABSENT: Johnson

ABSTAIN: None



CHARLES E. TREATCH, CHAIRMAN

ATTEST:

RON WHISENAND, PLANNING COMMISSION SECRETARY

H:darren/PD/PD09-001Specialty /NDRes

CITY OF PASO ROBLES – PLANNING DIVISION
INITIAL STUDY

1. GENERAL PROJECT INFORMATION

PROJECT TITLE: **Specialty Silicone:** PD 09-001

LEAD AGENCY: City of Paso Robles
1000 Spring Street
Paso Robles, CA 93446

Contact: Darren Nash, Associate Planner
Telephone: (805) 237-3970

PROJECT LOCATION: 3077 Rollie Gates Drive Drive, Paso Robles, CA (APN 025-453-001)

PROJECT PROPONENT: Applicant: Specialty Silicone Fabricators
William E. Reising, Jr.
2761 Walnut Avenue, Tustin, CA 92780

Representative: Oasis Associates
Attn: Carol Florence
3427 Miguelito Court
San Luis Obispo, CA 93401

GENERAL PLAN DESIGNATION: Business Park (BP)

ZONING: AP-PD (Airport Planned Development Overlay)

2. PROJECT DESCRIPTION

Request to construct a 103,524 square foot manufacturing facility and the demolition of an existing approximate 14,000 square foot building on the site located at 3077 Rollie Gates Drive. Within the building, including the mezzanine, 81,134 square feet would consist of manufacturing, 5,931 square feet would be warehouse, and 16,459 square feet would be for office use. See Attachment 1 for a project description by William E. Reising, CEO.

Specialty Silicone currently operates at the airport out of multiple buildings. One of these buildings which is the approximate 14,000 square foot building located on the site which will be removed. The other buildings are located off site in close proximity to the main building. The proposed new 103,524 square foot building would allow for all Specialty Silicone activities to take place under one roof on one site.

This initial study evaluates the potential environmental impacts of the construction and operation of the proposed new facility.

Environmental Setting:

The 4.2 acre site is fairly flat with a slight slope to the southeast. There is an existing approximate 14,000 square foot building located on the site that is currently operated by Specialty Silicone that is proposed to be demolished as part of this project. The site is an in-fill lot within the airport area that is surrounded by other buildings, improved streets and other vacant airport lease land.

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3. OTHER AGENCIES WHOSE APPROVAL MAY BE REQUIRED (For example, issuance of permits, financing approval, or participation agreement):

San Luis Obispo Air Pollution Control District (SLO APCD)

4. EARLIER ENVIRONMENTAL ANALYSIS AND RELATED ENVIRONMENTAL DOCUMENTATION:

This Initial Study incorporates by reference the City of El Paso de Robles General Plan Environmental Impact Report (EIR) (SCH#2003011123). Unless otherwise superseded by the City's standard Conditions of Approval, the EIR mitigation measures are attached to new development projects as Conditions to be implemented to the satisfaction of the City.

5. CONTEXT OF ENVIRONMENTAL ANALYSIS FOR THE PROJECT:

This Initial Study relies on expert opinion supported by the facts, technical studies, and technical appendices of the City of El Paso de Robles General Plan EIR. These documents are incorporated herein by reference. They provide substantial evidence to document the basis upon which the City has arrived at its environmental determination regarding various resources.

6. PURPOSES OF AN INITIAL STUDY

The purposes of an Initial Study for a Development Project Application are:

A. To provide the City with sufficient information and analysis to use as the basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration for a site specific development project proposal;

B. To enable the Applicant of a site specific development project proposal or the City as the lead agency to modify a project, mitigating adverse impacts before an Environmental Impact Report is required to be prepared, thereby enabling the proposed Project to qualify for issuance of a Negative Declaration or a Mitigated Negative Declaration;

C. To facilitate environmental assessment early in the design of a project;

D. To eliminate unnecessary EIRs;

E. To explain the reasons for determining that potentially significant effects would not be significant;

F. To determine if a previously prepared EIR could be used for the project;

G. To assist in the preparation of an Environmental Impact Report if one is required; and

H. To provide documentation of the factual basis for the finding of no significant effect as set forth in a Negative Declaration or a Mitigated Negative Declaration prepared for the a project.

7. EXPLANATION OF ANSWERS FOUND ON THE ENVIRONMENTAL CHECKLIST FORM

A. Scope of Environmental Review

This Initial Study evaluates potential impacts identified in the following checklist.

B. Evaluation of Environmental Impacts

1. A brief explanation is required for all answers to the questions presented on the following Environmental Checklist Form, except where the answer is that the proposed project will have "No Impact." The "No Impact" answers are to be adequately supported by the information sources cited in the parentheses following each question or as otherwise explained in the introductory remarks. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to the project. A "No Impact" answer should be explained where it is based on project-specific factors and/or general standards. The basis for the "No Impact" answers on the following Environmental Checklist Form is explained in further detail in this Initial Study in Section 9 (Earlier Environmental Analysis and Related Environmental Documentation) and Section 10 (Context of Environmental Analysis for the Project).

2. All answers on the following Environmental Checklist Form must take into account the whole action involved with the project, including implementation. Answers should address off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. "Potentially Significant Impact" is appropriate, if an effect is significant or potentially significant, or if the lead agency lacks information to make a finding of insignificance. If there are one or more "Potentially Significant Impact" entries when the determination is made, preparation of an Environmental Impact Report is warranted.

4. Potentially Significant Impact Unless Mitigated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. Mitigation Measures from Section 9 (Earlier Environmental Analysis and Related Environmental Documentation) may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). See Section 4 (Earlier Environmental Analysis and Related Environmental Documentation) and Section 11 (Earlier Analysis and Background Materials) of this Initial Study.

6. References to the information sources for potential impacts (e.g., general plans, zoning ordinances) have been incorporated into the Environmental Checklist Form. See Section 11 (Earlier Analysis and Related Environmental Documentation). Other sources used or individuals contacted are cited where appropriate.

7. The following Environmental Checklist Form generally is the same as the one contained in Title 14, California Code of Regulations; with some modifications to reflect the City's needs and requirements.

8. Standard Conditions of Approval: The City imposes standard conditions of approval on Projects. These conditions are considered to be components of and/or modifications to the Project and some reduce or minimize environmental impacts to a level of insignificance. Because they are considered part of the Project, they have not been identified as mitigation measures. For the readers' information, the standard conditions identified in this Initial Study are available for review at the Community Development Department.

9. Certification Statement: The statements made in this Initial Study and those made in the documents referenced herein present the data and information that are required to satisfy the provisions of the California Environmental Quality Act (CEQA) – Statutes and Guidelines, as well as the City's Procedures for Implementing CEQA. Further, the facts, statements, information, and analysis presented are true and correct in accordance with standard business practices of qualified professionals with expertise in the development review process, including building, planning, and engineering.

8. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The proposed project may potentially affect the environmental factors checked below, and may involve at least one impact that is a "Potentially Significant Impact" or is "Potentially Significant Unless Mitigated," if so indicated on the following Environmental Checklist Form (Pages 8 to.15)

☐ Land Use & Planning	☑ Transportation/Circulation	☐ Public Services
☐ Population & Housing	☐ Biological Resources	☐ Utilities & Service Systems
☐ Geological Problems	☐ Energy & Mineral Resources	☐ Aesthetics
☑ Water	☐ Hazards	☐ Cultural Resources
☑ Air Quality	☐ Noise	☐ Recreation
	☐ Mandatory Findings of Significance	

9. ENVIRONMENTAL DETERMINATION: On the basis of this initial evaluation: I find that:

The proposed project could not have a significant effect on the environment; and, therefore, a **NEGATIVE DECLARATION** will be prepared. ☐

Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. Therefore, a **MITIGATED NEGATIVE DECLARATION** will be prepared. ☑

The proposed project may have a significant effect on the environment; and, therefore an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

The proposed project may have a significant effect(s) on the environment, but one or more effects (1) have been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) have been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or is "potentially significant unless mitigated." ☐

Therefore, an **ENVIRONMENTAL IMPACT REPORT** is required, but it will analyze only the effect or effects that remain to be addressed.

Signature:	Date:
	July 22, 2009
Darren Nash, Associate Planner	

10 Environmental Checklist Form

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. LAND USE AND PLANNING. Would the Proposal:				
a) Conflict with general plan designation or zoning? (Sources: 1 & 8)	☐	☐	☐	☑
a) Be incompatible with existing land uses in the vicinity? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: a.&b *The request to construct a 103,524 square foot medical manufacturing facility would be consistent with the purpose and intent of the AP-PD zoning district, the Business Park land use designations of the General Plan, the General Plan EIR, as well as the Airport Land Use Plan. The request would be an expansion and consolidation of the existing Specialty Silicone operations currently taking place on this site and other neighboring sites. Since the project complies with the existing zoning, land use, airport land use and meets the policies of the City's Economic Strategy, the project would not be in conflict with general plan or zoning designations. The project also would not be incompatible with existing land uses.*

b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: As mentioned above, the project is consistent with the Airport Land Use Plan and General Plan/EIR and there are no other applicable environmental plans & policies that apply to the project site, therefore, the proposed project would not conflict with the applicable environmental plans or policies.

d) Affect agricultural resources or operations (e.g., impacts to soils or farmlands, or impacts from incompatible uses)?	☐	☐	☐	☑

Discussion: The project site is not on or adjacent to any farmland. Therefore, the proposed project would not affect agricultural resources, convert or have the potential to convert existing farmland to a nonagricultural use. Accordingly, the proposed project would result in no impact on important farmlands.

e) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The development of the proposed facility on this infill site within the airport area would not disrupt or divide the physical arrangement of an established community.

II. POPULATION AND HOUSING. Would the proposal:				
a) Cumulatively exceed official regional or local population projections? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The proposed project would not have a significant impact on local or regional population projections, since the proposed project consolidates several buildings currently being used by the applicant, and the new building would not create significant new jobs that would attract a significant amount of people to the area.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The development of the proposed facility would be designed to fit the site and would not induce growth in the area of the airport. Some infrastructure already exists in the vicinity and the surrounding area is already developed.

c) Displace existing housing, especially affordable housing? (Sources: 1, 3, & 5)	☐	☐	☐	☑

Discussion:
There would not be displaced housing as a result of the construction of this project.

III. GEOLOGIC PROBLEMS. Would the proposal result in or expose people to potential impacts involving:

a) Fault rupture? (Sources: 1, 2)	☐	☐	☑	☐

Discussion: The primary sources of potential ground shaking in the Paso Robles area are the Rinconanda Fault and San Andreas Fault. The Rinconada Fault system traverses the southwestern portion of the City. The San Andreas Fault is on the east side of the valley and runs through the community of Parkfield east of Paso Robles. Review of available information and examinations conducted as part of the General Plan Update EIR, indicate that neither of these faults is active with respect to ground rupture in Paso Robles.

The City of Paso Robles recognizes these geologic influences in the application of the Uniform Building Code (UBC) to all new development within the City. The potential for and mitigation of impacts that may result from fault rupture in the project area are identified and addressed in the General Plan EIR, pg. 4.5-8. Soils reports and structural engineering in accordance with local seismic influences would be applied in conjunction with any new development proposal. Based on standard conditions of approval, the potential for fault rupture and exposure of persons or property to seismic hazards is not considered significant. In addition, per requirements of the Alquist-Priolo Earthquake Fault Zones, only structures for human habitation need to be setback a minimum of 50 feet of a known active trace fault.

b) Seismic ground shaking? (Sources: 1, 2)	☐	☐	☑	☐

Discussion: The City is located within an active earthquake area that could experience seismic ground shaking from the Rinconada and San Andreas Faults. The General Plan EIR identifies impacts resulting from ground shaking as less than significant and provides mitigation measures that will be incorporated into the design of any development proposal on the project site, including adequate structural design and not constructing over active or potentially active faults. Future projects on the project site will be constructed to current UBC codes.

c) Seismic ground failure, including liquefaction? (Sources: 1,2)	☐	☐	☑	☐

Discussion: Per the General Plan and General Plan EIR, the project site is located in an area with moderate liquefaction risk. The EIR identifies measures to reduce this potential impact, which will be incorporated into this project. This includes a requirement to conduct a site-specific analysis of liquefaction potential. Based on analysis results, the design and construction of future development on the project site may include specific design requirements to reduce the potential impacts on structures due to liquefaction to a less than significant level.

10 Environmental Checklist Form

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Seiche, tsunami, or volcanic hazard? (Sources: 1, 2)	☐	☐	☐	☑

Discussion: The project area is approximately 30 miles from the Pacific Ocean, is approximately 800 feet above sea level, and is not located within close proximity to a lake, reservoir, or known volcano. As such, effects from seiche, tsunami, and volcanoes are not expected.

e) Landslides or Mudflows? (Sources: 1, 2)	☐	☐	☑	☐

Discussion: According to hazard maps contained in the General Plan (Figure S-4), the project is located in an area with a low potential of landslide risk. Effects from landslides or mudflows are not expected.

f) Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill? (Sources: 1, 2, 3, & 4)	☐	☐	☑	☐

Discussion: The project has been evaluated for impacts to existing surface and groundwater resources and is subject to compliance with the City's Urban Water Management Plan, Storm Water Management Plan, Grading Ordinance, and other applicable city ordinances and plans. In addition, development on the site will require coverage under the State General Construction Permit in order to comply with federal National Pollutant Discharge Elimination System (NPDES) requirements. The project applicant would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) to reduce potential erosion and subsequent sedimentation of storm water runoff. This SWPPP would include Best Management Practices (BMPs) to control erosion associated with grading, trenching, and other ground surface-disturbing activities.

g) Subsidence of the land? (Sources: 1, 2, & 3)	☐	☐	☐	☑

Discussion: Refer to c. above.

h) Expansive soils? (Sources: 4)	☐	☐	☑	☐

Discussion: Per the General Plan EIR, Paso Robles is an area that has moderately expansive soils. The proposed project is a policy change and does involved site disturbance that would be subject to expansive soils. New entitlement requests for the project site would be required to implement any recommendations of a site-specific soils report, as part of a development application.

i) Unique geologic or physical features? (Sources:1 & 3)	☐	☐	☐	☑

Discussion: There are no significant physical or geological features of the site.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. WATER. Would the proposal result in:				
a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff? (Sources:1, 3, & 7)	☐	☑	☐	☐
b) Exposure of people or property to water related hazards such as flooding? (Sources: 1, 3, & 7)	☐	☑	☐	☐
c) Discharge into surface waters or other alteration of surface water quality (e.g., temperature, dissolved oxygen or turbidity)? (Sources: 1, 3, & 7)	☐	☑	☐	☐
d) Changes in the amount of surface water in any water body? (Sources: 1, 3, & 7)	☐	☑	☐	☐
e) Changes in currents, or the course or direction of water movement? (Sources: 1, 3, & 7)	☐	☑	☐	☐

Discussion a-e: The City is obligated by the State Water Board to require that this project be developed in accordance with Best Management Practices(BMPs) to mitigate impacts to the quality of storm water run-off to the maximum extent possible. These goals will be accomplished by the implementation of Low Impact Development standards. Low Impact Development is an array of BMPs designed to ensure that a site's post-development hydrologic functions mimic those in its pre-development state. The preliminary grading plan incorporates these standards.

The project will impact the drainage course along the east side of Airport Road. An analysis has been prepared that assigns the project's share of drainage improvements outlined in the "Airport Business Park Drainage Analysis" prepared by Schaff and Wheeler on behalf of the City in April, 2008. Additional analysis was provided by North Coast Engineering (see Attachment 6). The following mitigation measure shall adequately address drainage impacts from this project, since it will provide fees to help the regional drainage system in the Airport area, as determined by the Airport Business Park Drainage Analysis plan.

W-1 The applicant shall provide their fair share of improvements to the drainage channel along Airport Road in accordance with the memo provided by North Coast Engineering dated May 20, 2009.

f) Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or through substantial loss of groundwater recharge capability? (Sources: 1,3, & 7)	☐	☐	☑	☐
g) Altered direction or rate of flow of groundwater? (Sources: 1, 3, & 7)	☐	☐	☐	☑
h) Impacts to groundwater quality? (Sources: 1, 3, & 7)	☐	☐	☑	☐
i) Substantial reduction in the amount of groundwater otherwise available for public water supplies? (Sources: 1, 3, & 7)	☐	☐	☑	☐

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Discussion: e – i: Paso Robles uses groundwater as its primary source of water. The Paso Robles Groundwater Basin encompasses an area of approximately 505,000 acres (790 square miles). The basin ranges from the Garden Farms area south of Atascadero to San Ardo in Monterey County, and from the Highway 101 corridor east to Shandon. The Atascadero sub basin encompasses the Salinas River corridor area south of Paso Robles, including the communities of Garden Farms, Atascadero, and Templeton. In general, groundwater flow moves northwest across the basin towards the Estrella area, then north towards the basin outlet at San Ardo. The biggest change in groundwater flow patterns in recent years has been the hydraulic gradient east of Paso Robles, along the Highway 46 corridor.

Specialty Silicone is currently operating in three separate buildings and with the construction of the new building all activities would be facilitated within the new building. Additionally there will not be a significant increase in manufacturing equipment and production. There will be the addition of new landscaping, however it will be required to be drought tolerant and low water use.

It is not anticipated that the new building will require a significant increase in water use, there fore the project would not result in substantial reduction in the amount of groundwater otherwise available for public water supplies. The project will be subject to NPDES requirements as previously referenced.

V. AIR QUALITY. Would the proposal:

a) Violate any air quality standard or contribute to an existing or projected air quality violation? (Sources: 1, 3, & 7)	☐	☑	☐	☐
b) Expose sensitive receptors to pollutants? (Sources: 1, 3, & 7)	☐	☑	☐	☐

Discussion a-b:
a & b: The San Luis Obispo County area is a non-attainment area for the State standards for ozone and suspended particulate matter. The SLO County Air Pollution Control District (APCD) administers a permit system to ensure that stationary sources do not collectively create emissions that would cause local and state standards to be exceeded. To aid in the assessment of project impacts subject to CEQA review, the APCD published the "CEQA Air Quality Handbook" in April 2003. This handbook establishes screening thresholds for measuring the potential of projects to generate air quality impacts. Generally, any project that has the potential to emit 10 lbs./day or more of reactive organic gases (ROG), oxides of nitrogen (NOx), sulfur dioxide (SO2), or particulate matter (PM10) or 50 lbs/day or more of carbon monoxide (CO) should be reviewed by the SLO APCD.

The Specialty Silicone project was sent to the APCD for review. The City received a letter from the APCD dated June 12, 2009 (Attachment 2 to this Initial Study). The APCD letter indicates that the construction phase impacts will be less than APCD's significance thresholds and no mitigation is required. The APCD indicates that the project will need to do the standard asbestos survey at the time of the request for a demolition permit for the existing building. There are some suggested mitigations related to dust control during construction.

The APCD is requesting mitigation related to the projects' operational phase. The APCD calculations indicate that operational impacts of ROG plus NOz will exceed the Tier I thresholds of 10 lbs/day (17.9 lbs/day) and requires the following standard mitigation measures.

APCD-1 If utility pipelines are scheduled for removal or relocation; or building 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).

APCD-2 The project shall be conditioned to comply with all applicable District regulations pertaining to the control of fugitive dust (PM-10) as contained in section 6.5 of the Air Quality Handbook. All site grading and demolition plans noted shall list the following regulations:

a. Reduce the amount of the disturbed area where possible.
b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (nonpotable) water should be used whenever possible.
c. All dirt stockpile areas should be sprayed daily as needed.
d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.
e. Exposed ground areas that are to be reworked at dates greater than one month after initial grading should be sown with a fast-germinating native grass seed and watered until vegetation is established.
f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.
g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114.
j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.
k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible

APCD-3 Construction Permit Requirements:

If portable equipment, 50 horsepower or greater, are used during construction, a California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to page A-5 in the Districts CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50hp or greater;
- IC Engines;
- Concrete batch plants;
- Rock and pavement crushing;
- Tub grinders; and
- Trommel screens.

APCD-4 Operational Phase Mitigation:

Standard Measures (Include all standard mitigation measures marked below)

- Provide on-site bicycle parking. One bicycle parking space (either bike racks, and/or bike lockers) for every 10 car parking spaces is considered appropriate.
- Provide on-site eating, refrigeration and food vending facilities to reduce employee lunchtime trips.
- Provide preferential carpool and vanpool parking spaces (5 spaces) near the primary employee entrance.
- Provide at least one shower for each sex and locker facilities to encourage employees to bike and/or

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

walk to work.

- Increase the building energy efficiency rating by 10 percent above what is required by Title 24 requirements. This can be accomplished in a number of ways (increasing attic, wall, or floor insulation, installing double paned windows, using energy efficient interior lighting, etc.).

APCD-5 Greenhouse Gas Impacts and Mitigation:

APCD also discussed in their June 12, 2009 letter Greenhouse Gas Impacts and Mitigation. The letter noted that APCD staff considered the operational impacts of this proposed planned development by running the URBEMIS2007 computer model, a tool for estimating vehicle travel, fuel use and resulting emissions related to the project's land uses. This indicated that operational phase impacts of the greenhouse gas known as carbon dioxide (CO2) will be approximately 5,971 pounds per day in the summer and 5,764 pounds per day in the winter. The letter concluded that " feasible GHG mitigation measures for both the construction and operational phases of this project should be identified from the CAPCOA document or from other proven energy efficiency measures and implemented."

The following are some measures suggested by the Office of the California Attorney General (Updated 12/09/08) that seem feasible for the Specialty Silicone project to incorporate into the design and operation of the site and facility.

- *Install efficient lighting and lighting control systems. Site and design building to take advantage of daylight;*
- *Use trees, landscaping and sun screens on west and south exterior building walls to reduce energy use;*
- *Install light colored "cool" roofs and cool pavements;*
- *Provide information on energy management services for large energy users;*
- *Install energy efficient heating and cooling systems, appliances and equipment, and control systems;*
- *Install LED exterior light fixtures;*
- *Limit hours of operation of outdoor lighting;*
- *Provide education on energy efficiency to employees;*
- *Create water efficient landscapes;*
- *Install water efficient irrigation systems and devices, such as soil moisture-based irrigation controls;*
- *Design buildings to be water efficient. Install water-efficient fixtures and appliances;*

c)	Alter air movement, moisture, or temperature?	☐	☐	☐	☑
d)	Create objectionable odors?	☐	☐	☐	☑

Discussion c – d: It is not anticipated that the proposed warehouse building would alter air movement, moisture, temperature, or create objectionable odor.

VI. TRANSPORTATION/CIRCULATION. Would the proposal result in:

a)	Increased vehicle trips or traffic congestion? (Sources: 1, 3, & 7)	☐	☑	☐	☐

Discussion:
The project consists of the construction of a 103,000 square foot manufacturing facility. The facility would allow for the consolidation of three existing buildings that currently house the Specialty Silicone operations. The development of the new

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

facility would not require new employees, but allow for the existing 202 employees and operations to function within one building.

The Specialty Silicone daily work schedule provides for shifts of employees to arrive and leave the facility at different times of the day. A table has been provided that shows the different shift times (See Attachment 3, Letter from Oasis Assoc. dated June 18, 2009 which includes Table). The table indicates that on any typical day that only a total of 148 employees work at the facility at any one time. Furthermore, 50-percent of the employees arrive by 7am and leave by 3:30 pm which is considered non-peak times of the day.

Given the fact that the 202 employees already work within two blocks of the new facility, that no new employees will be added, and the work force operates in shifts where a majority of the employees arrive and leave at off-peak hours of the day, new impacts on transportation and circulation systems will be less than significant.

In addition to the above, development impact fees which include traffic impact mitigation will be paid as part of the building permit fees for this project.

MM: T-1 Traffic impacts fees shall be deposited in amounts established by City Council in effect at the time of occupancy.

MM: T-2 Traffic demand strategies shall be implemented to limits impacts on peak hour traffic at the intersection of Highway 46E and Airport Road.

b) Hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: The project will not result in hazards from design features or incompatible uses.

c) Inadequate emergency access or inadequate access to nearby uses? (Sources:1, 3, & 7)	☐	☐	☐	☑

Discussion: The proposed project has been reviewed by the Emergency Services Department and complies with the required emergency access requirements. The project would not impact access to nearby uses.

d) Insufficient parking capacity on-site or off-site? (Sources: 1, 3, 7, & 8)	☐	☐	☑	☐

Discussion:
d. The project is proposing to provide 172 parking spaces on site. As discussed in Section a. related trips, Specialty Silicone's work force operates in shifts, where at any one time the maximum number of employees on site would be 148, it would appear that the proposed 172 spaces would be an adequate number of parking spaces for employees and visitors and therefore, impacts of the project on parking capacity would be less than significant. The Parking Ordinance, based on the buildings square footage for a manufacturing use would require 247 parking space. The applicant will be requesting that the Planning Commission allow a reduction of spaces since a large amount of manufacturing square footage is for large automated machines that are operated by very few employees. The applicants are proposing to provide 172 spaces based on the actual number of employees.

Additionally, the parking areas have been designed to accommodate Low Impact Development (LID) standards for surface drainage.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Hazards or barriers for pedestrians or bicyclists? (Source: 7)	☐	☐	☐	☑

Discussion:
e. The project would be entirely located on site and not within the public right of way. The on-site work would not create hazards to pedestrians or bicyclists.

f) Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)? (Sources: 1 & 8)	☐	☐	☐	☑

Discussion:
f. The project will be providing bicycle racks on site. Currently there are no established routes for public transit to the Airport area, nor are there any anticipated in the near future, however in the future when routes are established, a bus stop can be provided at the Airport Terminal, which would be across the street from this project site. This project and other new development in the airport area are required to pay traffic impact fees which could be used to install a bus stop.

g) Rail, waterborne or air traffic impacts?	☐	☐	☐	☑

Discussion:
g. The project is located at the Paso Robles Municipal Airport and would comply with Airport Land Use Plan in terms of use, building, colors materials and development standards.

VII. BIOLOGICAL RESOURCES. Would the proposal result in impacts to:

a) Endangered, threatened or rare species or their habitats (including but not limited to: plants, fish, insects, animals, and birds)?	☐	☐	☐	☑

Discussion: The project is considered an infill project within the airport business park area and is a previously disturbed property. The site is surrounded by existing improved streets as well as neighboring manufacturing facilities and the City of Paso Robles Airport Terminal. Of the 4.2 acre site, approximately 1.5 acres is currently disturbed by the existing building and parking lot areas. The remaining 2.7 acres is flat with annual grasses that is mowed on a regular basis for weed control.

There are no impacts to endangered, threatened or rare species or their habitats.

b) Locally designated species (e.g., heritage trees)?	☐	☐	☐	☑

Discussion: There are no oak trees located on this site.

c) Locally designated natural communities (e.g., oak forest, coastal habitat, etc.)?	☐	☐	☐	☑

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact

Discussion: This site is not located within a designated natural community.

d) Wetland habitat (e.g., marsh, riparian and vernal pool)? ☐ ☐ ☐ ☑

Discussion: There are no marsh, riparian, wet land or vernal pool habitat located on this site, therefore there will not be an impact wetland habitat.

e) Wildlife dispersal or migration corridors? ☐ ☐ ☐ ☑

Discussion: The project is considered an infill project within the airport business park area. The site is surrounded by existing improved streets as well as neighboring manufacturing facilities and the City of Paso Robles Airport Terminal. Of the 4.2 acre site, approximately 1.5 acres is currently disturbed by the existing building and parking lot areas. The remaining 2.7 acres is flat with annual grasses that are mowed on a regular basis for weed control.

There are no impacts to wildlife dispersal or migration corridors.

VIII. ENERGY AND MINERAL RESOURCES. Would the proposal:

a) Conflict with adopted energy conservation plans? (Sources: 1) ☐ ☐ ☐ ☑

Discussion: The proposed project will not conflict with adopted energy conservation plans. The structures constructed on the site will be required to comply with California Energy Code.

b) Use non-renewable resources in a wasteful and inefficient manner? (Sources: 1) ☐ ☐ ☑ ☐

Discussion: The project will not use or promote the use of non-renewable resource in a wasteful and inefficient manner.

The architect has designed the windows of the building to be constructed at an angle in order to provide passive shading of the glazing as well as optimal solar orientation. Also the building has been designed to utilize a cool roof system that will help provide better insulation and solar reflection. These architectural elements along with parking lot shade trees, and the use of energy efficient HVAC systems will help conserve resources and use them in a more efficient manner, therefore impacts to non-renewable resources will be less than significant.

c) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? (Sources: 1, 7) ☐ ☐ ☐ ☑

Discussion: The project is not located in an area of known mineral resources that would be of future value to the region and the residents of the State.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS. Would the proposal involve:				
a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)? (Sources: 1 & 7)	☐	☐	☐	☑
Discussion: The proposed project does not include the use, transport, or storage of hazardous materials and will not result in a risk of accidental explosion or release of hazardous substances.				
b) Possible interference with an emergency response plan or emergency evacuation plan? (Sources: 1 & 7)	☐	☐	☐	☑
Discussion: The proposed project will not interfere with an emergency response plan or emergency evacuation plan since it is not a designated emergency response location to be used for staging or other uses in an emergency.				
c) The creation of any health hazard or potential hazards? (Sources: 1, 7 & 11)	☐	☐	☐	☑
Discussion: The proposed development is consistent with the General Plan and Zoning Ordinance and would not result in the creation of a health hazard.				
d) Increased fire hazard in areas with flammable brush, grass, or trees? (Sources: 1 & 7)	☐	☐	☐	☑
Discussion: The development of the site is required to be in compliance with Uniform Building and Fire Codes, related building safety codes, and City and County brush and grass clearance requirements.				
X. NOISE. Would the proposal result in:				
a) Increases in existing noise levels? (Sources: 1, 7, 8 & 11)	☐	☐	☑	☐
b) Exposure of people to severe noise levels? (Sources: 1, 7, 8 & 11)	☐	☐	☑	☐
Discussion: Besides noise generated by the project during construction, the proposed use of the building is for manufacturing, warehouse and office purposes. Specialty Silicone currently holds its operations under multiple buildings at the airport where noise impacts have been less than significant. The construction of the new building would not significantly increase existing noise levels and there would not be an exposure of people to severe noise levels.				
XI. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered government services in any of the following areas:				
a) Fire protection? (Sources: 1, 3, 6, & 7)	☐	☐	☐	☑
b) Police Protection? (Sources: 1, 3, & 7)	☐	☐	☐	☑

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Schools? (Sources: 1, 3, & 7)	☐	☐	☐	☑
d) Maintenance of public facilities, including roads? (Sources: 1, 3, & 7)	☐	☐	☐	☑
e) Other governmental services? (Sources: 1,3, & 7)	☐	☐	☐	☑

Discussion: a.-e. Since the proposed project would be consistent with the general plan and zoning for this site, and since this project will be consolidating manufacturing activities that currently take place in the same neighborhood within multiple buildings, there will not be an increase in public services as a result of the development of the new Specialty Silicone building.

XII. UTILITIES AND SERVICE SYSTEMS. Would the proposal result in a need for new systems or supplies, or substantial alterations to the following utilities:				
a) Power or natural gas? (Sources: 1, 3, & 7)	☐	☐	☐	☑
b) Communication systems? (Sources: 1, 3, & 7)	☐	☐	☐	☑
c) Local or regional water treatment or distribution facilities? (Sources: 1, 3, & 7)	☐	☐	☐	☑
d) Sewer or septic tanks? (Sources: 1, 3, 7, & 8)	☐	☐	☐	☑
e) Storm water drainage? (Sources: 1, 3, & 7)	☐	☐	☐	☑
f) Solid waste disposal? (Sources: 1, 3, & 7)	☐	☐	☐	☑
g) Local or regional water supplies? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: a.-g.
There is an existing building on this site which currently utilizes the above listed utilities. The project would not result in the need for new wastewater treatment systems or water supplies, or result in substantial alterations to utilities and service systems. Electricity, natural gas, and telecommunications providers (PG&E, The Gas Company, and AT&T) currently serve the Paso Robles area and project vicinity. The proposed project will be required to hook-up to City water and sewer facilities and is required to mitigate potential impacts in the form of facilities or development impact fees.

XIII. AESTHETICS. Would the proposal:				
a) Affect a scenic vista or scenic highway? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: The project site is not located along a scenic highway.

b) Have a demonstrable negative aesthetic effect? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: The project's architecture and design would fit in with the existing character of the Airport area and would not have a negative effect.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Create light or glare? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: This project will be required to have light fixtures be shielded and downcast as required per city regulations.

XIV. CULTURAL RESOURCES. Would the proposal:

a) Disturb paleontological resources? (Sources: 1, 3, & 7)	☐	☐	☐	☑
b) Disturb archaeological resources? (Sources: 1, 3, & 7)	☐	☐	☐	☑
c) Affect historical resources? (Sources: 1, 3, & 7)	☐	☐	☑	☐
d) Have the potential to cause a physical change which would affect unique ethnic cultural values? (Sources: 1, 3, & 7)	☐	☐	☐	☑
e) Restrict existing religious or sacred uses within the potential impact area? (Sources: 1, 3, & 7)	☐	☐	☐	☑

Discussion: a. through e. The subject site is considered infill and has an existing building and parking lot located on a portion of the site. No known paleontological resources are located in the vicinity. There are no known religious or sacred uses on or near the project site. The project is not proposed in a location where it could affect unique ethnic cultural values.

Demolition of the existing 14,000 square foot building is proposed with this project. The building is not identified in any state or federal list of historic buildings, additionally the building is not included in the City's Survey of historic buildings and therefore the demolition of the building will not have a significant impact on historic resources..

XV.RECREATION. Would the proposal:

a) Increase the demand for neighborhood or regional parks or other recreational facilities? (Sources: 1, 3, & 7)	☐	☐	☐	☑
b) Affect existing recreational opportunities? (Sources 1, 3, & 7)	☐	☐	☐	☑

Discussion: The proposed project would not result in a cumulative population increase and would not affect projected demand for parks and recreational facilities.

ISSUES (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Sources: 1 & 3)	☐	☐	☑	☐

Discussion: With the mitigation measures outlined in this study, the proposed project will not in itself degrade the quality of the environment or impact habitat or populations of listed plant animal species.

b) Does the project have the potential to achieve short-term, to the disadvantage of long-term environmental goals? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The project will not likely have a potential to achieve short-term, to the disadvantage of long-term environmental goals.

c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The project will not result in significant cumulative impacts.

d) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? (Sources: 1 & 3)	☐	☐	☐	☑

Discussion: The project will not result in substantial adverse environmental impacts on human beings, either directly or indirectly.

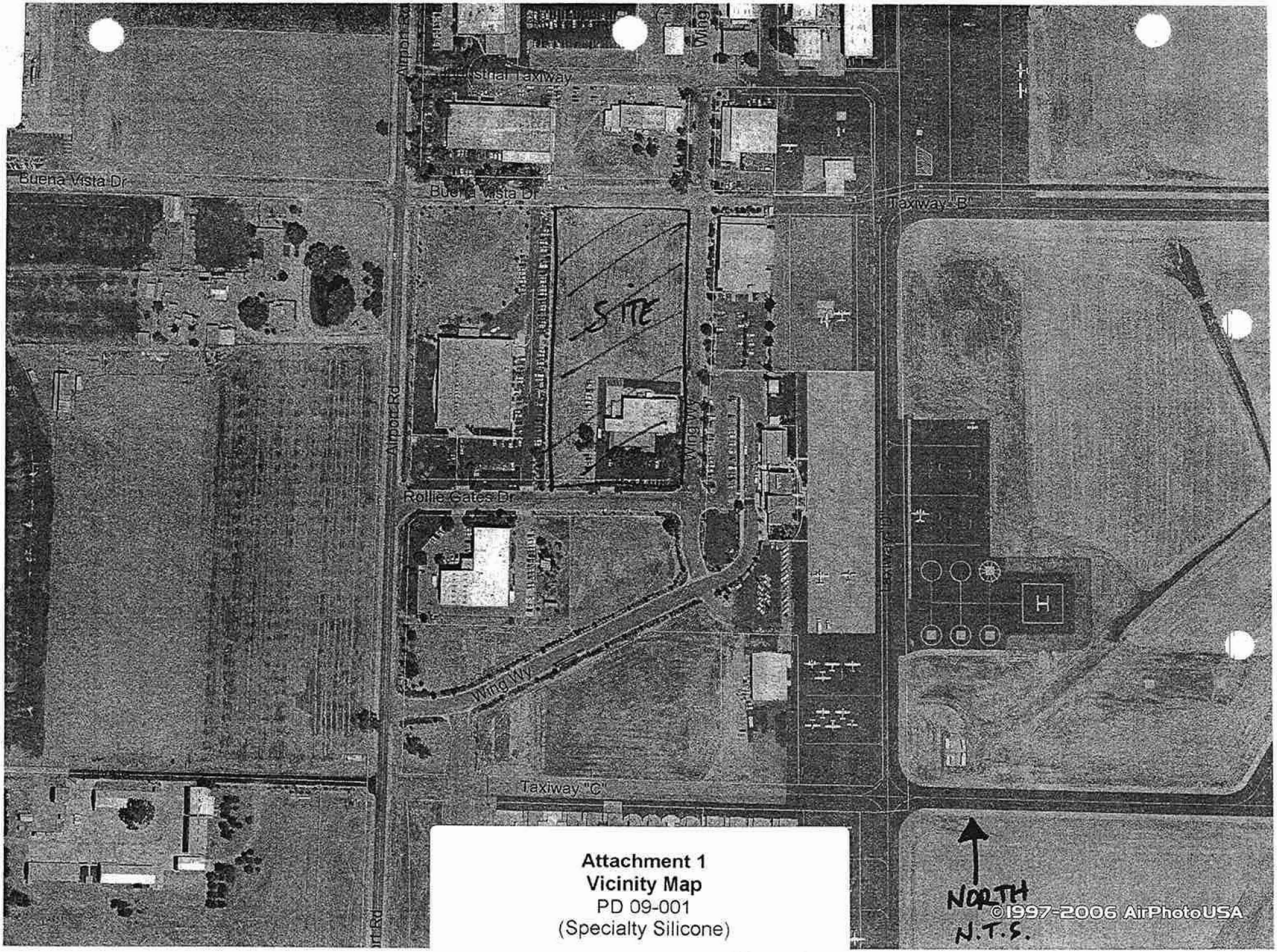
11. EARLIER ANALYSIS AND BACKGROUND MATERIALS

Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). The earlier documents that have been used in this Initial Study are listed below.

Reference Number	Document Title	Available for Review At
1	City of Paso Robles General Plan	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
2	Seismic Safety Element for City of Paso Robles	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
3	Final Environmental Impact Report City of Paso Robles General Plan	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
4	Soil Survey of San Luis Obispo County, California Paso Robles Area	USDA-NRCS, 65 Main Street-Suite 108 Templeton, CA 93465
5	Uniform Building Code	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
6	City of Paso Robles Standard Conditions of Approval For New Development	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
7	City of Paso Robles Zoning Code	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
8	City of Paso Robles, Water Master Plan	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
9	City of Paso Robles, Sewer Master Plan	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
10	Federal Emergency Management Agency Flood Insurance Rate Map	City of Paso Robles Community Development Department 1000 Spring Street, Paso Robles, CA 93446
11	Paso Robles Municipal Airport Land Use Plan	San Luis Obispo County Airport Land Use Commission (ALUC) 976 Osos Street, Room 300, San Luis Obispo, CA 93408

Attachments:

1. **Vicinity Map**
2. **APCD Letter**
3. **NCE Letter**



Attachment 1
Vicinity Map
PD 09-001
(Specialty Silicone)

AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN LUIS OBISPO

RECEIVED
JUN 16 2009
Engineering Division

June 12, 2009

Darren Nash, Associate Planner
City of Paso Robles Community Development Department
1000 Spring Street
Paso Robles, CA 93446

SUBJECT: APCD Comments Regarding the Specialty Silicone Fabricators (PD09-001) Project Referral. (PD09-001)

Dear Mr. Nash,

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 Paso Robles planned development project on a 4.2-acre parcel at 3077 Rollie Gates Drive that would construct a 103,524 foot manufacturing facility. This facility would consolidate the applicant's business that they are currently operating in three buildings. One of the buildings is located on the site where the new building would be constructed and this existing building would be demolished.

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

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. **Please address the action items contained in this letter that are highlighted by bold and underlined text**.

CONSTRUCTION PHASE MITIGATION
The APCD staff considered the construction impacts of this development by comparing it against screening models within the APCD's Air Quality Handbook. This indicated that construction phase impacts will likely be less than the APCD's significance threshold values of 185 lbs of emissions per day and 2.5 tons of emissions per quarter. Therefore, with the exception of the requirements below, the APCD is not requiring other construction phase mitigation measures for this project.

Developmental Burning
Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County**. Under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. This requires prior application, payment of fee based on the size of the project, APCD approval, and issuance of a burn permit by the APCD and the local fire department authority. The applicant is required to furnish the APCD with the study of technical feasibility (which includes costs and other constraints) at the time of application. If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

Demolition Activities
The project referral indicated that there is an e
demolished. Demolition activities can have p

3433 Roberto Court • San Luis Obispo,
info@slocleanair.or

Attachment 2
APCD Letter
PD 09-001
(Specialty Silicone)

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.

Greenhouse Gas Measures
See operational phase greenhouse gas measures section.

Dust Control Measures
Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. Dust complaints could result in a violation of the APCD's 402 "Nuisance" Rule. Any project with a grading area greater than 4.0 acres exceeds the APCD's PM10 quarterly threshold. **This project exceeds this threshold and is near potentially sensitive receptors and shall be conditioned to comply with all applicable Air Pollution Control District regulations pertaining to the control of fugitive dust (PM10) as contained in section 6.5 of the Air Quality Handbook. All site grading and demolition plans noted shall list the following regulations:**

a. Reduce the amount of the disturbed area where possible,
b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible,
c. All dirt stock pile areas should be sprayed daily as needed,
d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities,
e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating native grass seed and watered until vegetation is established,
f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD,
g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used,
h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site,
i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114,
j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site, and

k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.

All PM10 mitigation measures required should be shown on grading and building plans. In addition, the contractor or builder should designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. **The name and telephone number of such persons shall be provided to the APCD prior to land use clearance for map recordation and finished grading of the area.**

Construction Permit Requirements
Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to page A-5 in the District's CEQA Handbook.

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

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

OPERATIONAL PHASE MITIGATION

Operational Permit Requirements
Specialty Silicone Fabricators has an APCD permit to operation (#507-5) and will need to contact the APCD Engineering Division PRIOR to finalizing project plans at (805) 781-5912 to initiate an Authority to Construct evaluation.

Ozone Precursors - Nitrogen oxides (NOx) and reactive organic gases (ROG)
APCD staff has determined the operational phase ozone precursor impacts of this development through the use of the URBEMIS2007 computer model, a tool for estimating vehicle travel, fuel use and the resulting emissions related to this project's land uses. The results of the model using conservative County average trip distances demonstrated that the operational impacts of ROG plus NOx will exceed the APCD's CEQA Tier I significance threshold value of 10 lbs/day; 17.9 lbs/day.

As a result of this estimated threshold exceedence, this project must implement all applicable Standard Mitigation Measures listed below. Should this project move forward, the APCD will consider the overall air quality impacts from this project to have been reduced to a level of insignificance with the implementation of these mitigation measures. Other measures may be proposed as replacements by contacting the APCD Planning Division at 781-5912.

Standard Measures (Include all standard mitigation measures below)

- Provide on-site bicycle parking. One bicycle parking space for every 10 car parking spaces is considered appropriate.
- Provide on-site eating, refrigeration and food vending facilities to reduce employee lunchtime trips.
- Provide preferential carpool and vanpool parking spaces.
- Provide shower and locker facilities to encourage employees to bike and/or walk to work, typically one shower and three lockers for every 25 employees.
- Increase the building energy efficiency rating by 10% above what is required by Title 24 requirements. This can be accomplished in a number of ways (increasing attic, wall, or floor insulation, installing double pane windows, using efficient interior lighting, etc.).

Greenhouse Gas Impacts and Mitigation

Greenhouse Gas Background

The California's Attorney General has required numerous projects reviewed through CEQA, to quantify and implement feasible project level mitigation of greenhouse gas (GHG) emissions. Further, the Attorney General has stated that any project that produces large GHG emission increases clearly could be an obstacle to the State's effort to reach the goals defined in AB 32 and SB 375 to reduce greenhouse gas emissions and promote sustainable community strategies.

On June 19, 2008, the State of California's Governor's Office of Planning and Research (OPR) released a Technical Advisory entitled CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act Review. The Advisory is available at:

www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf

This document states:

> Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO2 and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.

Regarding the determination of GHG impact significance, the Technical Advisory states:

> The potential effects of a project may be individually limited but cumulatively considerable. Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g. transportation impacts).

Regarding GHG impact mitigation, the Technical Advisory states:

> The lead agency must impose all mitigation measures that are necessary to reduce GHG emissions to a less than significant level. CEQA does not require mitigation measures that are infeasible for specific legal, economic, technological or other reasons. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less than significant."

The California Air Pollution Control Officer Association (CAPCOA) published a document in January 2008 entitled "CEQA and Climate Change." The document is available at:

www.capcoa.org/CEQA/CAPCOA%20White%20Paper.pdf

This document provides methods for analyzing GHG both quantitatively and qualitatively and also provides a list of mitigations. This document is supported by both the Office of Planning and Research and the Attorney General's office.

Project Specific GHG Comments

The Attorney General requires GHG impact evaluation and the implementation of feasible mitigation at the project level. The APCD staff considered the operational impact of this proposed **planned** development by running the URBEMIS2007 computer model, a tool for estimating vehicle travel, fuel use and the resulting emissions related to this project's land uses. This indicated that operational phase impacts of the greenhouse gas known as carbon dioxide (CO2) will be approximately **5,971** pounds per day in the summer and **5,764** pounds per day in the winter. **Feasible GHG mitigation measures for both the construction and operational phases of this project should be identified from the above listed CAPCOA document or from other proven energy efficiency measures and implemented.**

Again, 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,

Andy Mutziger
Air Quality Specialist

AJM/lmg

cc: James Harley
Karen Brooks, Enforcement Division, APCD
Tim Fuhs, Enforcement Division, APCD
Gary Willey, Engineering Division, APCD

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NCE **NORTH COAST ENGINEERING, INC.**
Civil Engineering • Land Surveying • Project Development

MEMORANDUM

DRAFT

DATE: May 20, 2009

TO: John Falkenstien, City of Paso Robles

CC: Carol Florence, Oasis
Jim Goodman, Jim Goodman AIA

FROM: Christy Gabler

SUBJECT: Drainage Impact Analysis
Specialty Silicone Fabricators, PD 09-001

The following Drainage Impact Analysis has been prepared in response to your request dated April 1, 2009 and phone conversation on May 13, 2009.

Reference: Airport Business Park Drainage Analysis, March 26, 2008
Prepared by Schaaf & Wheeler

Objective: 1) Determine the increase in stormwater run-off from the subject property to the Airport Road drainage channel.
2) Determine the proportionate share of a drainage impact fee based on Table 1. Cost Estimate, Airport Blvd Swale, in the referenced Schaaf & Wheeler report.

Analysis:

The Schaaf & Wheeler Drainage Analysis reviews existing drainage issues in the area of the Paso Robles Municipal Airport (PRMA). There are three watershed areas and associated conveyance systems described in the analysis. They are:

- Dry Creek Road (drains to the west and south to Huer-Huero Creek
- Airport Road (drains north along the existing Airport Road channel
- the PRMA open space and taxiway culverts

These systems are analyzed in order to estimate costs associated with infrastructure improvements to mitigate existing drainage issues in the area.

Attachment 3
NCE Letter
PD 09-001
(Specialty Silicone)

DRAFT

The City of Paso Robles owns 157 acres of leasable land in this area and wishes to distribute the cost associated with the suggested Schaaf & Wheeler improvements among those parcels.

The subject project site is among those in the Airport Road watershed. 88 acres of the City's property drains toward Airport Road. The project site is approximately 4.5 acres in size, accounting for 5.1% of the City's landholdings that drain that direction.

The Schaaf & Wheeler study suggests general improvements for each of the three watershed areas with associated cost ranges. They are:

Improvement	Cost		
	Low	Median	High
Dry Creek Road System	$200,000	*$1,250,000*	$2,300,000
Huer-Huero System		$300,000	
Airport Road Culverts	$50,000	*$125,000*	$200,000
Airport Road Swale	$300,000	*$400,000*	$500,000
Open Space Grading		$100,000	
Taxiway Channel		$150,000	
West Taxiway System		$200,000	
Subtotal	$1,300,000	$2,525,000	$3,750,000
25% Contingency	$325,000	$631,250	$937,500
Total	$1,625,000	$3,156,250	$4,687,500

The two highlighted Airport Road improvements are associated with the project's watershed area. The improvements to Airport Road are not described in the drainage study beyond regrading the drainage channel adjacent to the road and replacing culvert crossings. The median cost for the improvements is $525,000 plus a 25% contingency, or $656,250.

The project accounts for 5.1% of the City's landholdings contributing stormwater to the Airport Road system.

The drainage impact fee for the proposed Specialty Silicone Fabricator project would be 5.1% of $656,250, or $33,470.