COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

Initial Study – Environmental Checklist

PLN-2039
04/2019

Project Title & No. Snug Harbor LLC Site Plan Review ED20-116 DRC2019-00099

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☒ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology & Water Quality	☐ Transportation
☒ Biological Resources	☐ Land Use & Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities & Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology & Soils	☐ Population & Housing	☒ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation, the Environmental Coordinator finds that:

☐ The proposed project COULD NOT have a significant effect on the environment, and 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 revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Lacey Minnick	Lacey Minnick Digitally signed by Lacey Minnick DN: C=US, E=lminnick@co.slo.ca.us, O=County of San Luis Obispo, OU=Planning and Building, CN=Lacey Minnick Date: 2020.07.13 12:15:41-07'00'		July 13, 2020
Prepared by (Print)	Signature		Date
Steve McMasters	Steven McMasters Digitally signed by Steven McMasters DN: C=US, E=smcmasters@co.slo.ca.us, O=County of San Luis Obispo, OU=Planning & Building, CN=Steven McMasters Date: 2020.07.13 09:25:23-07'00'	For Xzandrea Fowler, Environmental Coordinator	July 13, 2020
Reviewed by (Print)	Signature		Date

Initial Study – Environmental Checklist

Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Planning Department, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. Project

DESCRIPTION: A request by **Snug Harbor LLC** for Site Plan approval (DRC2019-00099) for the construction of a 6.6-acre private storage facility for recreational vehicles and boats. The project will result in approximately 6.6 acres of site disturbance, including 14,930 cubic yards of cut and fill, on a 10.22-acre site. The project is located on the east side of Heritage Road, directly opposite the boat launch, approximately 800 feet north of Heritage Loop in the village of Heritage Ranch. The project is within the Recreation land use category and the Nacimiento Sub Area of the North County Planning Area.

Access will be provided through a gated entrance from Heritage Road. The facility will include an 8,500 square foot (sf), two-story building that will house a check-in area, office, caretaker residence, and maintenance shop. The proposed building will be two stories and will incorporate agrarian design elements that include a pitch roof, clearstory windows and board and batten exterior materials. The building will have metal roll-up doors to provide access to the vehicle maintenance area; and a covered porch on the north-eastern and southern sides (Figure 5). Parking is provided for six vehicles adjacent to the building.

Recreational vehicles and boats will be stored in either enclosed units or covered spaces arranged in rows in the center and along the perimeter of the site. Pavement will support two-way traffic throughout the facility (Figure 3).

The regional location of the project site is shown in Figure 1, and an aerial view is provided in Figure 2. Table 1 provides a summary of project components.

Initial Study – Environmental Checklist

Table 1 – Project Components

Project Component	Dimensions	Quantity	Area	Bldg. Height
Check-In Building Maintenance Shop Check-In Office Caretaker Unit Loft Storage *Sub-Total:*	--	--	 4,899 sf 879 sf 299 sf 1,189 sf 1,293 sf *8,558 sf*	34.5 ft.
Enclosed Storage Units	14 ft x 45 ft	58	630 sf	20 ft.
	10 ft x 15 ft	28	4,200 sf	
	15 ft x 30 ft	17	7,650 sf	
Covered Storage Spaces	12 ft x 50 ft	49	29,400 sf	20 ft.
	12 ft x 30 ft	16	5,760 sf	
Open Storage	--	--	5,280 sf	--
Parking and Driveways	--	6 spaces	175,000 sf	--
Landscaping	--	--	39,970 sf	--
Outdoor Vehicle Wash Station	--	--	2,500 sf	--
Total:			**287,507 (6.6 acres)**	

The project will operate year-round and 7 days per week between the hours of 7AM to 10PM and will serve the residents of Heritage Ranch, a private community with a gated entrance from Nacimiento Lake Road. The project will employ one full time employee who will reside in the on-site caretaker unit.

Baseline Conditions. The project site is vacant and consists of a 10.2-acre parcel located on the north side of Heritage Road about 0.2 miles north of the intersection with Heritage Loop Road. The project site contains scattered oak trees and non-native grasses and two ephemeral drainages; topography is gently to steeply sloping. Surrounding land uses include vacant land designated for Open Space, Recreation, Residential Rural and Commercial Retail development. A boat launch and parking area is located about one mile to the west.

The project site is within service area of the Heritage Ranch Community Services District. The District provides water, wastewater and solid waste disposal for a service population of about 2,400.

A more detailed environmental setting is provided for each of the topical sections of this Initial Study.

Initial Study – Environmental Checklist

ASSESSOR PARCEL NUMBER(S): 012-191-068

Latitude: 35.44 degrees N **Longitude:** 120.535 degrees W **SUPERVISORIAL DISTRICT #** 1

B. Existing Setting

Plan Area: North County **Sub:** Nacimiento **Comm:** Heritage Ranch

Land Use Category: Recreation

Combining Designation: None

Parcel Size: 10.22 acres

Topography: Gently sloping to moderately sloping

Vegetation: Scattered Oaks Grasses

Existing Uses: Vacant

Surrounding Land Use Categories and Uses:

North: Recreation; undeveloped ***East:*** Recreation; undeveloped

South: Residential Multi-Family; vacant ***West:*** Recreation; undeveloped

Initial Study – Environmental Checklist

Figure 1 -- Project Vicinity Map

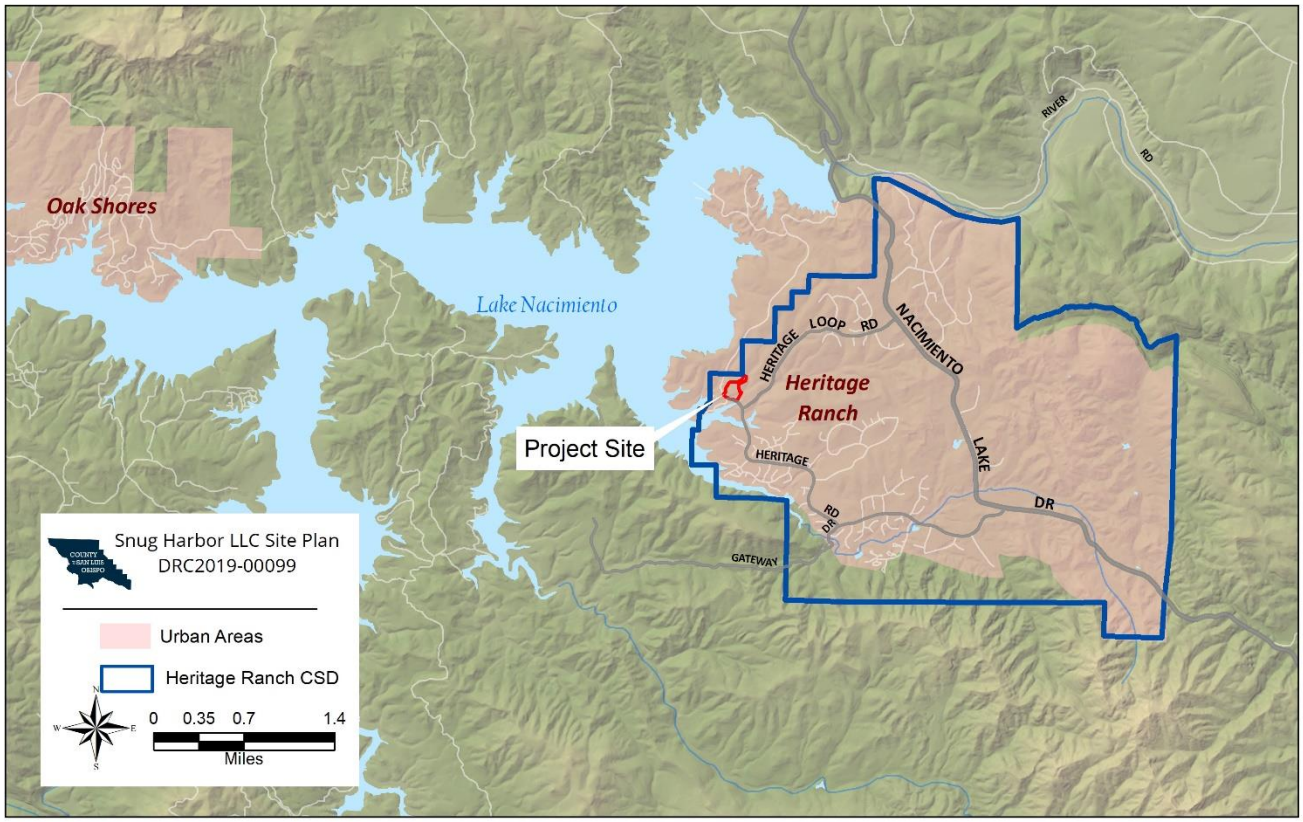
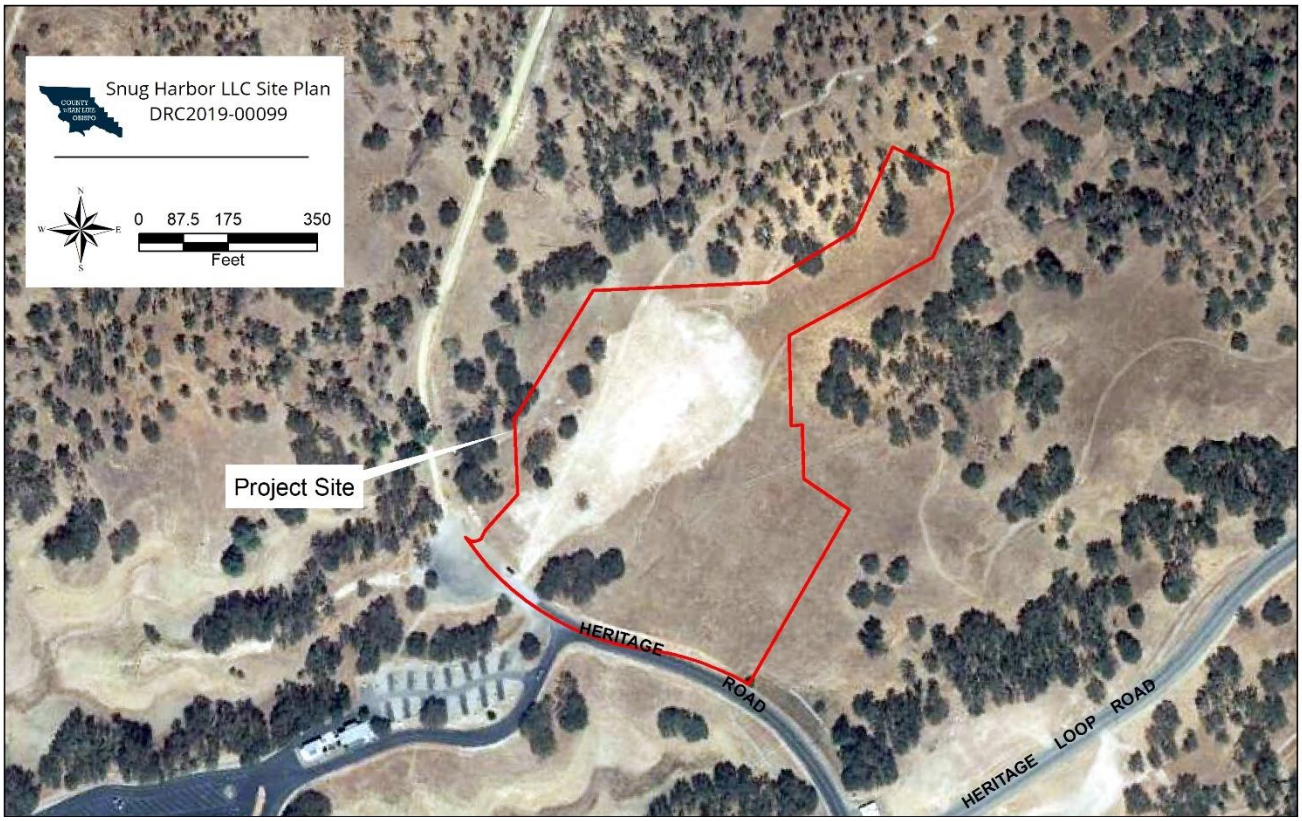
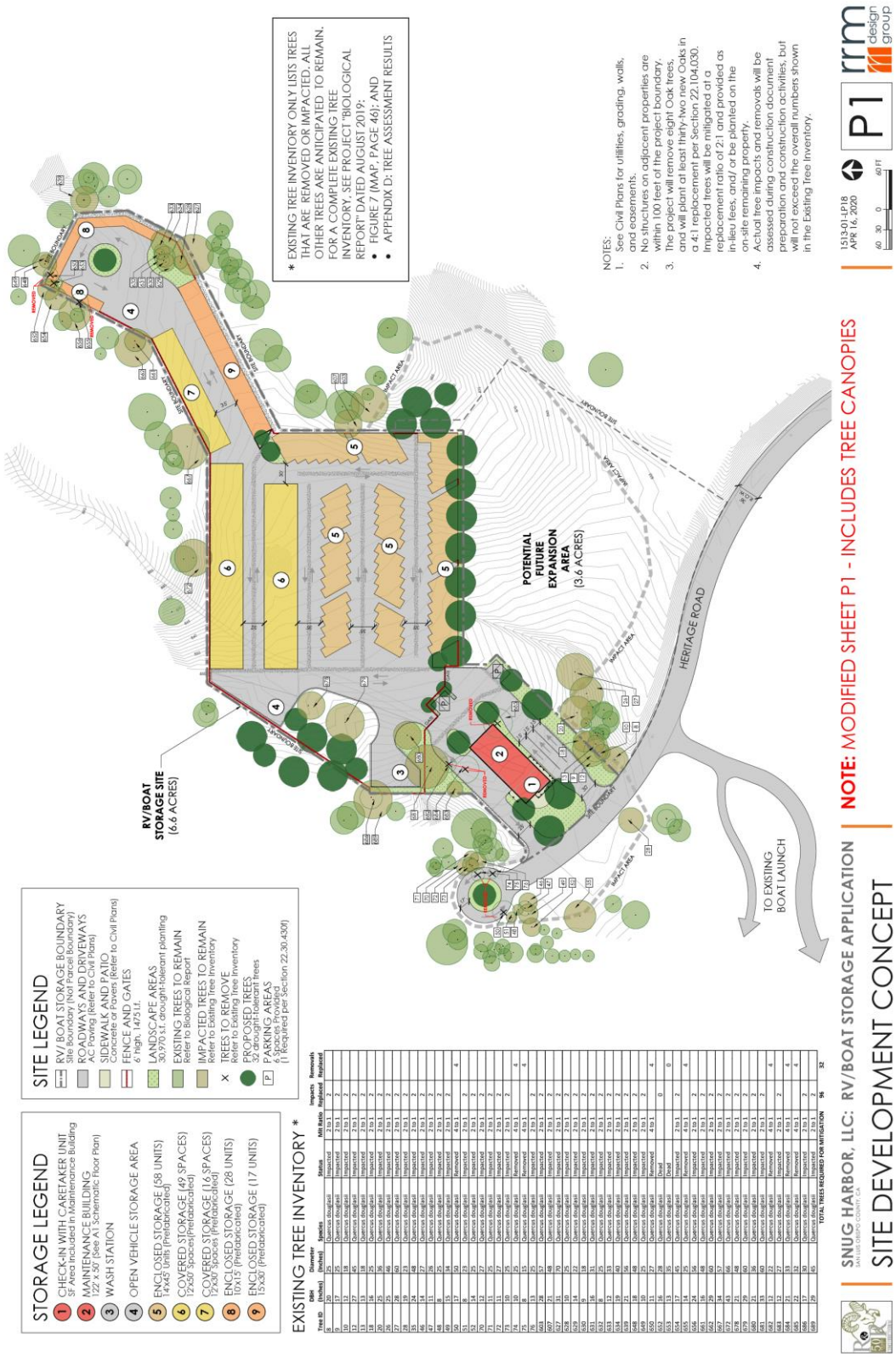


Figure 2 -- Aerial View of the Project Site



Initial Study – Environmental Checklist

Figure 3 -- Site Plan



Initial Study – Environmental Checklist

Figure 4 – Preliminary Grading and Drainage

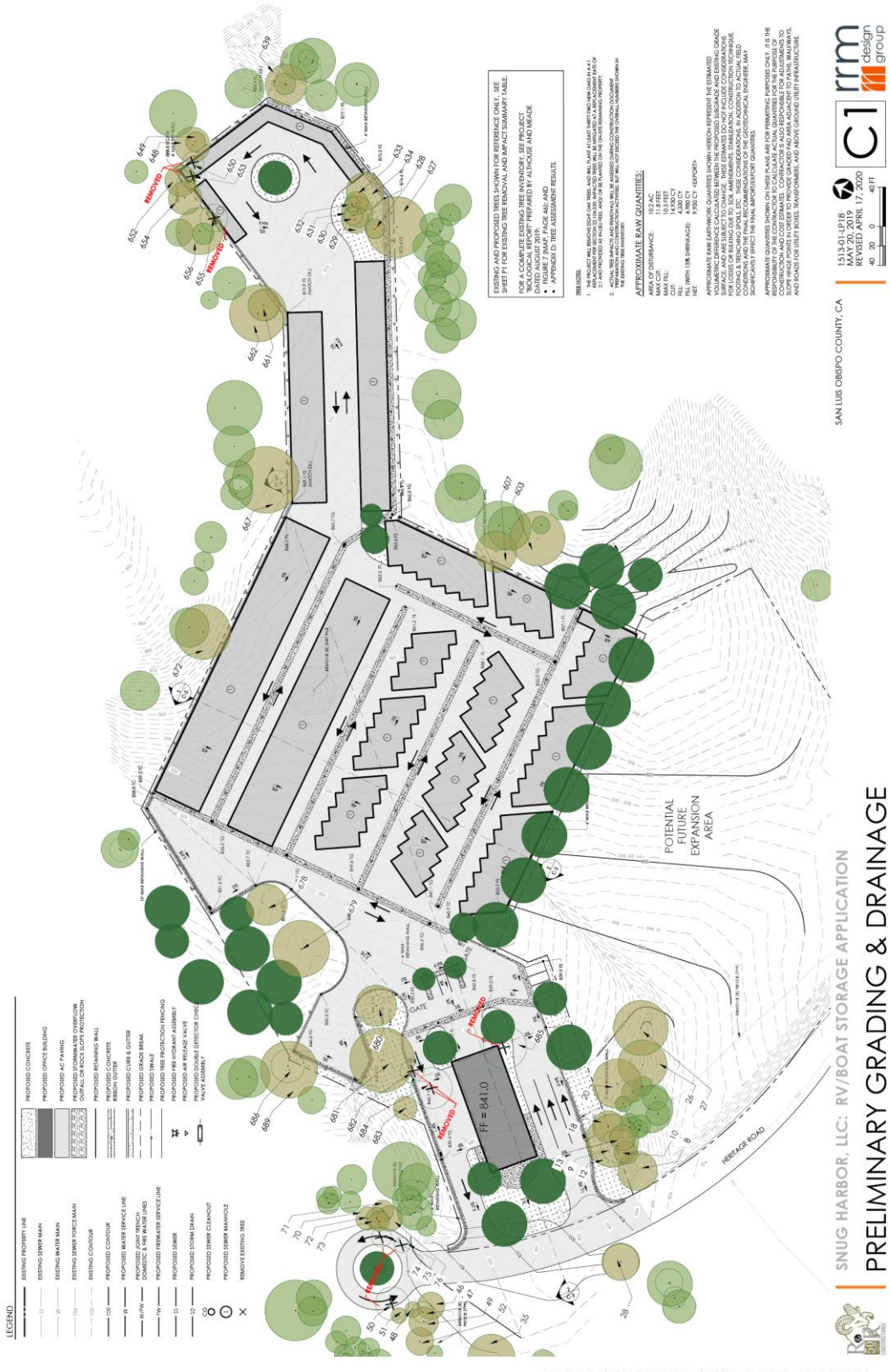


Figure 5 -- Check-in/Maintenance Building Elevation With Colors and Materials

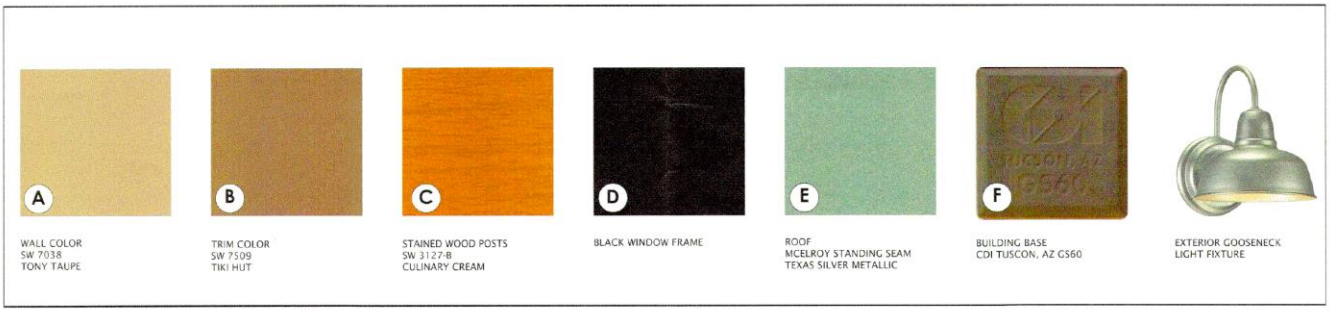
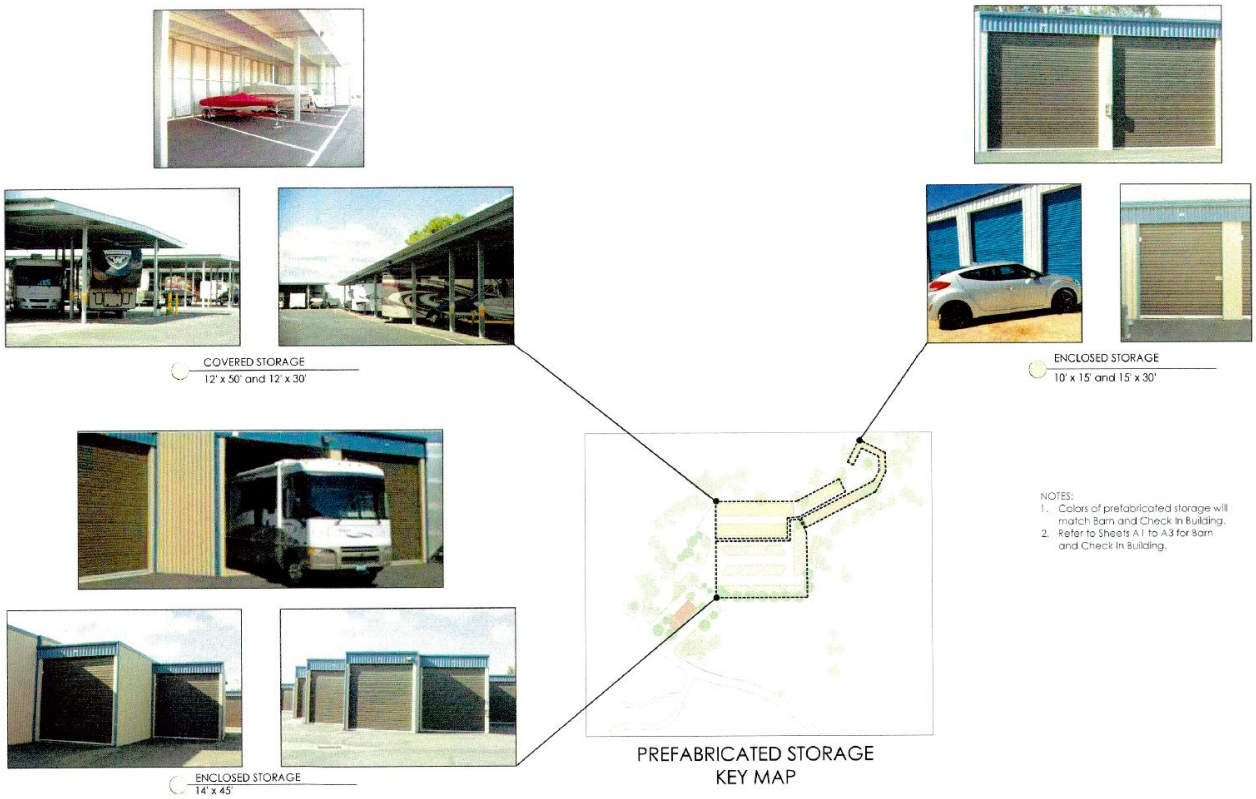


Figure 6 -- Storage Buildings



C. Environmental Analysis

The Initital Study Checklist provides detailed information about the environmental impacts of the proposed project and mitigation measures to lessen the impacts.

I. AESTHETICS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Setting

The project site is 10.22-acres located in the private community of Heritage Ranch in a semi-rural area of the county where the predominant land use is recreation and large-lot residences on parcels ranging in size from five acres to over 15 acres. The visual quality of the area is relatively high. The project site fronts Heritage Road where it forms the northern terminus of Heritage Loop Road from the south. Views from Heritage Road are expansive as the roadway winds through the community of Heritage Ranch from Nacimiento Lake Road above the shores of Lake Nacimiento. Traffic counts taken on Heritage Loop Road in 2018 revealed an afternoon peak hour volume of 192 in the vicinity of the project site and 1,687 average daily trips.

The Conservation and Open Space Element (COSE) of the County of San Luis Obispo General Plan identifies several goals for visual resources in rural parts of the county, listed below:

- **Goal VR 1:** The natural and agricultural landscape will continue to be the dominant view in rural parts of the County.

- **Goal VR 2:** The natural and historic character and identity of rural areas will be preserved.
- **Goal VR 5** Views from scenic vistas and vista points will be protected.
- **Goal VR 6** A cohesive visual character will be maintained in urban areas.
- **Goal VR 7:** Views of the night sky and its constellation of stars will be maintained.

Some of the strategies identified to accomplish the goals listed above include encouraging project designs that emphasize native vegetation and conforming grading to existing natural forms, as well as ensuring that new development follows the Countywide Design Guidelines to protect rural visual and historical character.

The Countywide Design Guidelines identify objectives for both urban and rural development. Rural area guidelines applicable to the project include the following:

- **Objective C-3**: The height, bulk, and scale of new commercial development should be compatible with that of surrounding commercial development.
- **Objective C-4:** Commercial buildings outside downtowns should have interesting roof shapes and interrupted parapet lines, avoiding long, flat parapet roofs.
- **Objective C-6:** Commercial projects should include landscaping that adds a natural or suburban character, provided shading and screening of parking areas.
- **Objective RU-5:** Fences and screening should reflect an area's rural quality.
- **Objective RU-7:** Landscaping should be consistent with the type of plants naturally occurring in the County and should limit the need for irrigation.

The Inland Land Use Ordinance details standards for exterior lighting (LUO Section 22.10.060).

The only Officially Designated State Scenic Highway in San Luis Obispo County is Highway 1. The project site is not visible from Highway 1. The COSE, however, does identify Nacimiento Lake Drive from Paso Robles to Monterey as a suggested scenic corridor, and there is a sensitive resource designation on portions of that road. The project is not visible from Nacimiento Lake Drive.

Discussion

(a) Have a substantial adverse effect on a scenic vista?

For the purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The project site is located in a private residential community and accessed by Heritage Road, which would serve as the primary public vantage for viewing the project site.

While the project vicinity has relatively high scenic value and an appealing rural character, it is not considered a scenic vista as it does not offer expansive views of a highly valued landscape and is not officially or unofficially designated as a scenic vista. Therefore, the project would not result in a substantial adverse effect on a scenic vista, and *no impacts would occur.*

(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is not located along, nor is it visible from, a designated state scenic highway or eligible state scenic highway (Caltrans 2019). Therefore, the project would not result in substantial damage to scenic resources within a state scenic highway, and *no impacts would occur.*

(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Heritage Ranch is a private, semi-urban residential community that is not open to the general public; new development is subject to the planning area standards set forth in LUO Section 22.104.030. Section 22.104.030 8. provides site planning and development standards which include the following:

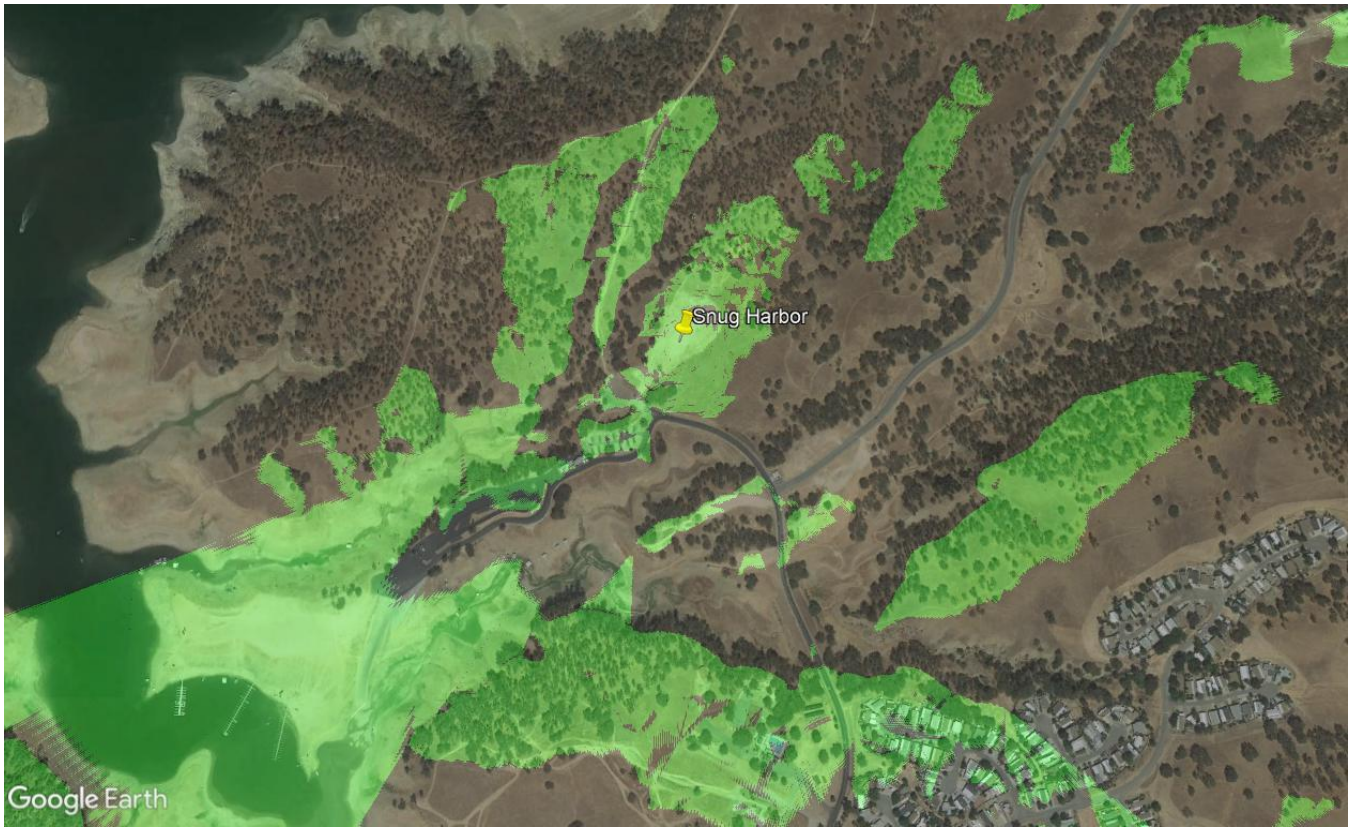
- *Site new development to avoid areas of dense brush and oak woodland vegetation to the maximum extent feasible*.
- *Restrict removal and impacts to the root zones of oak or grey pine trees which measure more than eight inches in diameter at four feet above existing grade to proposed road rights-of-way, parking areas, and building pads, except where authorized by an approved Zoning Clearance, Minor Use Permit, Conditional Use Permit, or Tree Removal permit*.
- *Replacement trees shall be planted at a ratio of two trees for every one tree impacted and four trees planted for every one tree removed. Replacement trees shall be one gallon and shall be the same species as the tree removed or impacted.*

  Discussion: The project site contains non-native grasses and scattered oak trees. According to the tree inventory provided with the project application materials, there are a total of 168 mature oak trees on the project site. Of these, eight blue oak trees (*Quercus douglisii*) will be removed and 50 oak trees will be impacted. Therefore, about 95% of the mature oak trees will be retained, consistent with the LUO standards. In addition, mitigation measure BIO-9 requires replacement trees to be planted at a ratio of four trees for every one tree removed (4:1).
- *Site new development to avoid areas with slopes exceeding 30 percent*.

  Discussion: According to the preliminary grading and drainage plan provided with the application, a level building area will be excavated from the hillside that will require 14,930 cubic yards (cy) of cut and 4,330 cy of fill with 9,950 cy of export offsite. The maximum cut will be 11.8 feet. All of the grading will occur on slopes that are less than 20%, consistent with this standard.

Figure 7 depicts areas around the project site (shown in green) with a line-of-site view of the project site. As shown on Figure 7, the project site is not visible from a publicly accessible road or gathering place. However, it is visible from a small portion of Lake Nacimiento which is open to the public for recreational boating. The area of the lake where the project site is visible contains a private dock and boat launch for residents of Heritage Ranch and no publicly-accessible facilities. Accordingly, boat traffic in the area consists largely of local residents and not the general public.

Figure 7 --- Line of Site Viewshed of the Project Site



The proposed building will be 34.5 feet tall incorporating design elements that recall the rural, agrarian character of the ranchlands that surround Lake Nacimiento. The building will be of wood-frame construction with a pitch roof and siding that resembles traditional batten and board. The building will incorporate a row of clearstory windows just under the eaves along the long axis of the building; a covered porch will wrap around the main entrance. Metal roll-up doors will allow access along the southern and western sides of the building to the interior maintenance area.

Overall, the project will complement the rural character of Heritage Ranch and will be consistent with the relevant provisions of the LUO governing the protection of visual resources through site design. The project site will not be visible from any public vantage points. Therefore, the project will not substantially degrade the existing visual character or quality of public views of the site or its surroundings, and impacts would be *less than significant.*

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project includes exterior lighting for safety and for nighttime access to the storage facility. The project is subject to the standards for exterior lighting set forth in LUO Section 22.10.060. Therefore, impacts associated with the creation of a new source of substantial light would be *less than significant.*

Initial Study – Environmental Checklist

Conclusion

The project is not located within view of a scenic vista and would not result in a substantial change to scenic resources in the area. The project would be consistent with existing policies and standards in the County LUO and COSE related to the protection of scenic resources. The project will be conditioned to comply with the standards for exterior lighting (LUO Section 22.10.060). Impacts to aesthetic resources would be less than significant.

Mitigation

None necessary.

II. AGRICULTURE AND FORESTRY RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting

The California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and current land use. For environmental review purposes under CEQA, the FMMP categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland,

Farmland of Local Importance, and Grazing Land are considered "agricultural land." Other non-agricultural designations include Urban and Built-up Land, Other Land, and Water. Based on the FMMP, soils at the project site are within the Grazing Land designation (CDOC 2016).

Chapter 6 of the County COSE identifies resource management goals, policies, and strategies to protect agricultural soils from conversion to urban and residential uses. Important Agricultural Soils within the County are identified in Table SL-2 of the COSE and Policy SL 3.1 states that proposed conversion of agricultural lands to non-agricultural uses shall be evaluated using the applicable policies in the COSE and Agricultural Element.

Soils of the project site are described in detail below. The acreage and corresponding farmland classifications are provided in Tables 2 and 3.

Dibble clay loam, 9 to 46 percent slopes

This component is on hillslopes on hills. The parent material consists of residuum weathered from sandstone and shale. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. Nonirrigated land capability classification is 6e. Irrigated land capability classification is 6e. This soil does not meet hydric criteria.

Dibble clay loam, 50 to 75 percent slopes

This component is on mountains. The parent material consists of residuum weathered from sandstone and shale. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is low. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 1 percent. Nonirrigated land capability classification is 7e. Irrigated land capability classification is 7e. This soil does not meet hydric criteria. There are no saline horizons within 30 inches of the soil surface.

Ryer clay loam, 2 to 9 percent slopes

This component is on alluvial fans. The parent material consists of alluvium derived from mixed rocks. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is high. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Nonirrigated land capability classification is 4e. Irrigated land capability classification is 2e. This soil does not meet hydric criteria.

Table 2 – County Farmland Classifications and Acreages of Soils On-Site

Soil	COES Classification	Acres	Acres Impacted By Project
Dibble clay loam 30-50% slopes	Not Classified as Important Farmland	1.09	0.00
Dibble clay loam 50-76% slopes	Not Classified as Important Farmland	0.21	0.00
Ryer clay loam 2-9% slopes	Prime Farmland	8.92	6.60
Total:		10.22	6.60

Source: Classifications based on Table SL-2 of the County General Plan's Conservation/Open Space Element

Table 3 – FMMP Farmland Classifications and Acreages of Soils On-Site

FMMP Classification	Acres	Acres Impacted By Project
Unique Farmland	0.00	0.00
Grazing	1.12	0.00
Farmland of Local Potential	8.87	6.60
Other	0.00	0.00
Urban and Built Up	0.23	0.00
Total:	10.22	6.60

Source: Farmland Mapping and Monitoring Program, 2016

The Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agriculture or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The project site is not located on, or adjacent to, a property under a Williamson Act contract.

According to California Public Resources Code (PRC) Section 12220(g), forest land is defined as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland is defined as land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As shown in Tables 2 and 3, the area of project disturbance does not contain land classified as Prime Farmland, Unique Farmland or Farmland of Statewide Importance according to the FMMP (California Department of Conservation [DOC] 2016). However, construction of the project will result in the

permanent conversion of 6.6 acres of Farmland of Local Potential. This impact is considered *less than significant* because:

- Although soils of the project site may have the potential to support cultivation, the project site is located in a semi-urban area surrounded by land designated for rural residential, open space and recreation land uses.
- The small size, irregular shape and steep topography of the parcel make crop production infeasible.

(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is located within the Recreation land use designation where RV and boat storage is an allowed use. The project site and surrounding properties are not currently under a Williamson Act contract. Therefore, the project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract and *no impacts would occur.*

(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The project site does not include land use designations or zoning for forest land or timberland; *no impacts would occur.*

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

The project site currently supports oak woodland and scattered oak trees that provide an aesthetic benefit to the area as well as wildlife habitat. The project would result in the removal of approximately eight mature oak trees with a diameter at breast height of 8 to 22 inches. These eight oak trees are part of a discontinuous canopy and their removal would represent less than 5% of the total oak tree canopy on-site. In addition, oak trees removed as part of the project will be subject to the County's oak tree replacement standards as described in Section IV, Biological Resources. The potential impacts associated with the conversion of forest land to non-forest use would be insignificant.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The project site is in a semi-urban community with no agricultural operations. Therefore, the project will not involve any changes that could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. *No impact will occur*.

Conclusion,

The project would not result in potentially significant impacts associated with the conversion of farmland, forest land, or timber land to non-agricultural uses or non-forest uses and would not conflict with agricultural zoning or otherwise adversely affect agricultural resources or uses. Potential impacts to agricultural resources would be less than significant with incorporation of mitigation measure BIO-9 that requires the replacement of oak trees at a ratio of 4:1.

Mitigation

Implement mitigation measure BIO-9 in Section IV relating to the replacement of oak trees.

III. AIR QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

San Luis Obispo County Clean Air Plan

The San Luis Obispo County Air Pollution Control District (SLOAPCD) San Luis Obispo County 2001 Clean Air Plan (CAP) is a comprehensive planning document intended to evaluate long-term air pollutant emissions and cumulative effects and provide guidance to the SLOAPCD and other local agencies on how to attain and maintain the state standards for ozone and particulate matter 10 micrometers or less in diameter (PM_{10}). The CAP presents a detailed description of the sources and pollutants that impact the jurisdiction's attainment of state standards, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality. In order to be considered consistent with the San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP.

SLOAPCD Criteria Pollutant Thresholds

The SLOAPCD has developed and updated their CEQA Air Quality Handbook (most recently updated with a November 2017 Clarification Memorandum) to help local agencies evaluate project-specific impacts and determine if air quality mitigation measures are needed, or if potentially significant impacts could result. This handbook includes established thresholds for both short-term construction emissions and long-term operational emissions. The APCD Handbook includes screening criteria to determine the significance of project impacts. According to the Handbook, a project with grading in excess of 4.0 acres and moving 1,200 cubic yards of earth per day can exceed the construction threshold for respirable particulate matter (PM_{10}).

The nearest sensitive receptors to the site are single-family residences located approximately 2,300 feet (0.4 miles) south.

Use of heavy equipment and earth-moving operations during project construction can generate fugitive dust and engine combustion emissions that may have substantial temporary impacts on local air quality and climate change. Combustion emissions, such as nitrogen oxides (NOx), reactive organic gases (ROG), greenhouse gases (GHG), and diesel particulate matter (DPM), are most significant when using large, diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators, and other heavy equipment. The SLOAPCD has established thresholds of significance for each of these contaminants.

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial, and industrial development. Certain types of projects can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (referred to as stationary source emissions). Table 1-1 of the APCD's CEQA Handbook provides screening criteria based on the size of different types of projects that would normally exceed the operational thresholds of significance for greenhouse gases and ozone precursors. Operational impacts are focused primarily on the indirect emissions associated with motor vehicle trips associated with development. The land use category of that best corresponds to the vehicle storage business is a mini-storage facility, According to the APCD CEQA Handbook Clarification Memorandum, a mini storage business of 265,000 sq. ft. would likely exceed the operational thresholds for ROG and NOx and would require mitigation.

The APCD has also estimated the number of vehicular round trips on an unpaved roadway necessary to exceed the 25 lbs/day threshold of significance for the emission of particulate matter (PM10). According to the APCD estimates, an unpaved roadway of one mile in length carrying 6.0 round trips would likely exceed the 25 lbs/day PM10 threshold.

The prevailing winds in the project vicinity are from the north and west (onshore) during the daylight hours and are slightly offshore at night. The nearest sensitive receptors to the site are single-family residences located approximately 2,300 feet (0.4 miles) south.

Sensitive Receptors

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others, due to the population that occupies the uses and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. The nearest sensitive receptor location to the project site are single-family residences located approximately 2,300 feet (0.4 miles) south of the project site.

Naturally Occurring Asbestos

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by the California Air Resources Board (CARB). Serpentine and other ultramafic rocks are fairly common throughout San Luis Obispo County and may contain NOA. If these areas are disturbed during construction, NOA-containing particles can be released into the air and have an adverse impact on local air quality and human health. Based on SLOAPCD's NOA Screening Map, the project site is not located in an area identified as having potential for soils containing NOA.

Developmental Burning

As of February 25, 2000, the SLOAPCD prohibits developmental burning of vegetative material within San Luis Obispo County. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: SLOAPCD approval; payment of fee to SLOAPCD based on the size of the

project; and issuance of a burn permit by the SLOAPCD and the local fire department authority. As a part of SLOAPCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) at the time of application.

Discussion

(a) Conflict with or obstruct implementation of the applicable air quality plan?

In order to be considered consistent with the 2001 San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP (SLOAPCD 2012). Adopted land use planning strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The project includes development that would not be open to the public, therefore, land use planning strategies such as mixed-use development and planning compact communities are generally not applicable. The project would result in the establishment of activities that are commercial in nature and would employ one full-time regular employee, likely drawn from the local labor pool. Therefore, the project would not significantly affect the local area's jobs/housing balance.

Adopted transportation control measures include, but are not limited to, a voluntary commute options program, local and regional transit system improvements, bikeway enhancements, and telecommuting programs. The voluntary commute options program targets employers in the County with more than 20 full time employees; because the project would employ up to a maximum of one employee, this program would generally not be applicable to the project. The project would not conflict with regional plans for transit system or bikeway improvements. Project employees would generally be performing security, custodial and maintenance tasks; therefore, the project would not be a feasible candidate for participation in a telecommuting program.

Therefore, the project would not conflict with or obstruct implementation of the CAP; therefore, impacts would be *less than significant.*

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The County is currently designated as non-attainment for ozone and PM_{10} under state ambient air quality standards. Construction and operation of the project would result in emissions of ozone precursors including reactive organic gasses (ROG) and nitrous oxides (NO_X) as well as fugitive dust emissions (PM_{10}).

Construction Emissions

As proposed, the project will result in approximately 6.6 acres (287,406 square feet) of ground disturbance including 14,930 cy of cut and fill. This will result in the creation of construction dust, as well as short-term construction vehicle emissions. Construction-related emissions are estimated in Table 4 below and compared with the SLOAPCD thresholds of significance.

Table 4. Estimated Construction Emissions

Pollutant	Total Estimated Project Emissions	APCD Emissions Threshold	Mitigation Required?
Reactive Organic Gases (ROG) + Nitrogen Oxide (NO_x) (combined)	140.22 lbs/day	137 lbs/day	**Yes**
	2.41 tons/quarter	2.5 tons/quarter	**Yes**
Diesel Particulate Matter (DPM)	7.3 lbs/day	7 lbs/day	**Yes**
	0.16 tons/quarter	0.13 tons/quarter	**Yes**
Fugitive Particulate Matter (PM_{10})	0.31 tons/quarter	4.0 acres of grading	**Yes**

Source: CalEEMod 2016.3.2

Notes:

1. Model results and assumptions are provided in Attachment A.

As shown in Table 4., construction activities will exceed APCD thresholds for construction. Accordingly, mitigation measures AQ-1 and AQ-2 are recommended to reduce project construction emissions of fugitive dust (PM_{10}) and diesel particulates through minimization of disturbance area where possible, use of water trucks or sprinkler systems, regular watering of dirt stockpiles, and maintenance of the unpaved access road.

Upon implementation of measures AQ-1 and AQ-2, the project's ROG and NO_x, DPM, and PM_{10} emissions would be reduced to below the SLOAPCD's daily and quarterly emissions thresholds.

Operation-Related Emissions

Based on the low number of employees (1) and the seasonal/recreational use of the vehicles stored on the project site, the average number of daily motor vehicle trips generated by the project is expected to be in the range of one to 12 trips per day. According to the 2012 SLOAPCD CEQA Handbook, a mini storage business of 265,000 sq. ft. would likely generate motor vehicle trips that would exceed operational emissions thresholds and require mitigation. The project will have about 53,000 sq. ft. of storage area which is well below the operational threshold for ozone precursors.

Potential project impacts associated with a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment would be *less than significant with mitigation.*

(c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are people or other organisms that may have a significantly increased sensitivity to exposure to air pollution by virtue of their age and health (e.g. schools, day care centers, hospitals, nursing homes), regulatory status (e.g. federal or state listing as a sensitive or endangered species), or proximity to the source. The nearest sensitive receptors to the site are single-family residences located approximately 2,300 feet (0.4 miles) south of the project site. Residences may be occupied by sensitive receptors who could be exposed to diesel particulates and fugitive dust from construction activities.

The project would result in temporary increases in air pollutant emissions, including emissions of fugitive dust (PM_{10}) and diesel-exhaust particulate matter (DPM) during project construction. These pollutants are known to be hazardous to health, particularly when exposed to a sensitive receptor. However, as discussed above, the project would not require ground disturbance within 1,000 feet of

a sensitive receptor. Regardless, implementation of mitigation measures AQ-1 and AQ-2 would effectively protect sensitive receptors; therefore, potential impacts would be *less than significant.*

(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The project site is not located in an area identified as containing NOA by the SLOAPCD. The project does not propose to burn any onsite vegetative materials and would be subject to SLOAPCD restrictions on developmental burning of vegetative material; therefore, the project would not result in substantial air pollutant emissions from such activities.

The project includes the storage of motor vehicles and boats and would include an outdoor area for vehicle washing. However, the project also includes facilities for pumping out wastewater storage tanks from recreational vehicles into underground storage tanks on the project site that will be connected to the community wastewater collection system. Given the infrequency of wastewater pumping and the distance to the nearest sensitive receptor (about 0.4 miles) odors associated with these activities are not expected to be significant.

Construction could generate odors from heavy diesel machinery, equipment, and/or materials. The generation of odors during the construction period would be temporary, would be consistent with odors commonly associated with construction, and would dissipate within a short distance from the active work area. The project has been located and designed to prevent any long-term operational nuisance odor emissions from affecting surrounding properties. Therefore, potential impacts associated with other emissions, such as odors, would be *less than significant*.

Conclusion

The project would be consistent with the SLOAPCD's Clean Air Plan and thresholds for operational emissions. The project would have the potential exceed the SLOAPCD's construction thresholds for fugitive dust emissions and would be subject to standard mitigation measures to reduce associated impacts to less than significant. The project would not expose sensitive receptors to substantial pollutant concentrations that would require mitigation. The project has been located and designed to prevent any long-term operational nuisance odor emissions from affecting surrounding properties. Therefore, potential impacts to air quality would be less than significant with the following mitigation.

Mitigation

AQ-1 **Construction Equipment Emissions Controls.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

a. Maintain all construction equipment in proper tune according to manufacturer's specifications;

b. Fuel all off-road and portable diesel-powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);

c. Use diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;

d. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;

e. Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NOx exempt area fleets) may be eligible by proving alternative compliance;

f. All on and off-road diesel equipment shall not idle for more than 5 minutes.

g. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit;

h. Diesel idling within 1,000 feet of sensitive receptors is not permitted;

i. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;

j. Electrify equipment when feasible;

k. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,

l. Use alternatively fueled construction equipment onsite where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

AQ-2 **Fugitive Dust Construction Control Measures.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

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 stockpile areas should be sprayed daily as needed;

d. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;

e. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and

f. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and 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 Compliance Division prior to the start of any grading, earthwork or demolition.

IV. BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Initial Study – Environmental Checklist

Setting

Federal and State Endangered Species Acts

The Federal Endangered Species Act of 1973 (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act of 1984 (CESA) ensures legal protection for plants listed as rare or endangered, and wildlife species formally listed as endangered or threatened, and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the California Department of Fish and Wildlife (CDFW) has the authority to review projects for their potential to impact special-status species and their habitats.

The Migratory Bird Treaty Act of 1918 (MBTA) protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the U.S. Fish and Wildlife Service (USFWS), and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other federal agencies and are required to be evaluated under CEQA.

Conservation and Open Space Element

The intent of the goals, policies, and implementation strategies in the COSE is to identify and protect biological resources that are a critical component of the county's environmental, social, and economic well-being. Biological resources include major ecosystems; threatened, rare, and endangered species and their habitats; native trees and vegetation; creeks and riparian areas; wetlands; fisheries; and marine resources. Individual species, habitat areas, ecosystems, and migration patterns must be considered together in order to sustain biological resources. The COSE identifies Critical Habitat areas for sensitive species, including La Graciosa thistle (*Cirsium loncholepis*), California red legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), vernal pool fairy shrimp (*Branchinecta lynchi*), Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*), Morro shoulderband snail (*Helminthoglypta walkeriana*), California condor (*Gymnogyps californianus*), and western snowy plover (*Charadrius alexandrinus nivosus*). The COSE also identifies features of particular importance to wildlife for movement corridors such as riparian corridors, shorelines of the coast and bay, and ridgelines.

A Biological Report was prepared for the project site in August 2019, by Althouse and Meade, Inc. The following is a summary of the findings and recommendations of that assessment.

Methodology

Relevant literature, including relevant plans, policies, and biological information, was reviewed to identify the biological resources that may occur near or in the Study Area. Research included queries of special-status species occurrence records and a review of literature on sensitive species and biological resources in the project area and region.

The biologists conducted a search of the California Natural Diversity Database (CDFW 2019), the California Native Plant Society (CNPS) On-line Inventory of Rare and Endangered Plants of California (CNPS 2019), and USFWS Critical Habitat data for special status species known to occur in the nine USGS 7.5-minute quadrangles surrounding the Study Area.

Additional special status species research consisted of reviewing previous biological reports for the area, and herbarium specimen records for locality data within San Luis Obispo County. Additional special status species with potential to occur on or near the Study Area were added to the special status species list.

Special status species lists produced by database and literature searches were cross-referenced with the described habitat types in the Study Area to identify all potential special status species that could occur on or near the Study Area. Each special status species that could occur on or near the Study Area is individually discussed below.

After a review of the literature, the following criteria were used to determine the potential for special-status species to occur within the Study Area:

Present: The species was observed in the Study Area during field surveys.

High Potential: High habitat quality combined with CNDDB occurrences or other records indicate the species is likely to occur on the Study Area. Individuals may not have been observed in the Study Area during field surveys; however, the species likely occurs in the project vicinity and could move into the project site in the future.

Moderate Potential: Suitable habitat is present in the Study Area and CNDDB occurrences or surveys have recorded the species in the vicinity of the Study Area. Individuals were not observed during surveys but the species could be present, at least seasonally or as a transient.

Low Potential: Marginally suitable habitat is present in the Study Area, but there are no occurrence records in the vicinity or only historical (i.e. 50 years or older) records within 10 miles of the Study Area. Individuals were not observed during surveys and are not expected to be present.

No Potential: Species, sign, or habitat were not observed on the Study Area during surveys and suitable habitat is not present.

The Study Area was surveyed for biological resources on July 11 and 18, 2019 and April 7, 2020 by Althouse and Meade, Inc. biologists Shannon Henke and Kyle Nessen. Surveys were conducted on foot to compile species lists, search for special status plants and animals, map habitats, assess trees, and to photograph the Study Area. The entire Study Area was surveyed by meandering transects to access all areas of the site.

Each habitat type occurring in the Study Area was inspected, described, and cataloged. All plant and animal species observed in the Study Area were identified and recorded. Reconnaissance transects were meandering with an emphasis on locating habitat appropriate for special status plants. Transects were utilized to map boundaries of different vegetation types, describe general conditions and dominant species, compile species lists, and evaluate potential habitat for special status species. Identification of botanical resources included field observations and laboratory analysis of collected material (refer to Table 5). Botanical surveys were conducted on July 11, 2019 and April 7, 2020, according to agency guidelines (USFWS 2000; CNPS 2001; CDFW 2018a).

Wildlife documentation included observations of animal presence and wildlife signs such as nests, burrows, tracks, and scat. Observations of wildlife were recorded during field surveys in all areas of the Study Area. Birds were identified by sight, using 10-power binoculars, or by vocalizations. Reptiles and amphibians were identified by sight, using binoculars, and by hand-captures; traps were not used. Mammals recorded in the Study Area were identified by sight and tracks.

All native trees within the Study Area were marked in the field with an aluminum tag, and GPS location was taken. Tree height, canopy width, diameter at breast height (dbh), and signs of wildlife, such as nests or cavities, were recorded. The overall health of each tree was assessed based on past failures, structural defects, and foliar condition. Any signs of pests or disease were noted. Trees were inspected from the ground only; tree canopies were not accessed, and no below-ground inspection took place.

Habitat Types

Four habitat types comprising 14.1 acres were identified and mapped in the Study Area: blue oak woodland, needle grass – melic grass grassland, annual brome grassland, and upland mustards and other ruderal forbs (CNPS 2019b). The remaining 0.6 acres of the Study Area is anthropogenic habitat comprised of a small section of Heritage Road and a hard-packed bare dirt parking area with no vegetation; this area will not be discussed further.

The habitats dominated by native plant species (blue oak woodland and needle grass – melic grass grassland) are of moderate quality. The blue oak trees are in moderate to poor health, and the understory is composed primarily of weedy plant species. The needle grass – melic grass grassland supports dense nodding needle grass (Stipa cernua) but low native plant diversity overall. Table 5 lists the described habitat types, their location, and approximate acreage within the Study Area.

Table 5 -- Habitat Types of the Study Area

Habitat Type	Global and State Rank	Location	Approximate Acreage
Blue oak woodland	G4/S4	Sloping terrain and drainage features.	2.8
Needle grass -melic grass grassland	G4/S4	Throughout the Study Area.	2.9
Annual brome grassland	None	Throughout the study area.	5.7
Upland mustard and other ruderal forbs	None	Recently disturbed soils.	2.7

Blue oak woodland

Blue oaks (Quercus douglasii) dominate sloping terrain within the Study Area. Tree density, health, and size are variable across the site and many trees show signs of drought. Occasional standing dead grey pines (Pinus sabiniana) are located in blue oak woodland near the Study Area. Understory vegetation is dominated by dense ripgut brome (Bromus diandrus) and occasional patches of needle grass – melic grass grassland.

The biologists assessed 168 trees within the Study Area. All living trees were identified as blue oak, except for two foothill pines. Of the 168 trees assessed, 125 are in moderate condition, 34 are in poor condition, and 9 are healthy. Prolonged drought has affected many of the oak trees within the Study Area. Of the assessed trees, 89 percent showed evidence of twig or branch dieback, and at least 49 percent of trees had epicormic sprouting, both characteristic of water stress. These defects primarily account for the low percentage of healthy trees occurring in the Study Area. Structural defects were common among the blue oaks. At least 40 percent of assessed trees had included bark, and 24 percent had unbalanced canopies. These defects compromise the longevity of the trees and lower their health rating.

Oak woodland provides valuable habitat to a variety of species. California ground squirrels were commonly found to burrow under and around oak trees within the Study Area. Several species of birds, including acorn woodpeckers, sapsuckers, and cavity-nesting species were found to use the trees.

Needle grass – melic grass grassland

Native perennial nodding needle grass (Stipa cernua) dominates portions of the gently sloping terrain. Other occasional native species includes California melic (Melica californica), small flowered melic (M. imperfecta),

and naked buckwheat (Eriogonum nudum) that intergrade with species common in adjacent grassland and ruderal habitats.

Annual brome grassland

Soft chess brome (Bromus hordeaceus) and wild oat (Avena barbata) dominate the annual grassland habitat in the Study Area. Other species include Salinas River tarweed (Deinandra pentactis), threeray tarweed (D. lobbii), and Spanish lotus (Acmispon americanus var. americanus).

Upland mustards and other ruderal forbs

A portion of the Study Area has had recent ground disturbance and is dominated by non-native field mustard (Hirshfeldia incana). Vegetation density is variable with some areas with very low vegetation cover. Other species include native dove weed (Croton setigerus), common vervain (Verbena lasiostachys) and species common in adjacent annual brome grassland.

Potential Jurisdictional Wetlands and Waters

Potentially jurisdictional Waters of the U.S. and or State are located in the Study Area. Two small ephemeral drainages were noted in the southwestern portion of the Study Area; the northern feature is approximately 308 feet long and the southern feature is approximately 503 feet long. The drainages occur on the lower slope and drain toward culverts that convey water under Heritage Road and southeast into the southern reaches of Lake Nacimiento. Both drainages are grassy swales, dominated by annual brome grassland. Blue oak woodland overlaps the drainage features. Both drainages were dry at the time of survey and did not have a defined bed and bank. No wetlands were observed within the Study Area.

Botanical Resources

Botanical surveys conducted in July 2019 and April 2020 identified 50 species, subspecies, and varieties of vascular plant taxa in the Study Area. The list includes 28 species native to California and 22 introduced (naturalized or planted) species. Native plant species account for approximately 56 percent of the Study Area flora; introduced species account for approximately 44 percent. No special status plant species were detected in the Study Area. Botanical nomenclature used in the study follows the Jepson Manual, Second Edition (Baldwin et al. 2012). Jepson Manual First Edition names are provided in brackets where nomenclature has recently changed (Hickman 1993).

Table 6 -- Vascular Plants of the Project Site

Common Name	Scientific Name	Special Status	Origin
Trees – 2 Species			
Foothill pine	*Pinus sabiniana*	None	Native
Blue oak	*Quercus douglasii*	None	Native
Forbs - 35 Species			
Spanish lotus	*Acmispon americanus var. americanus* [*Lotus purshianus* var. *purshianus*]	None	Native
Bur chervil	*Anthriscus caucalis*	None	Introduced
Indian milkweed	*Asclepias eriocarpa*	None	Native
Italian thistle	*Carduus pycnocephalus* subsp. *pycnocephalus*	None	Introduced
Narrow leaved owl's clover	*Castilleja attenuata*	None	Native
Tocalote	*Centaurea melitensis*	None	Introduced
Spikeweed	*Centromadia* [*Hemizonia*] *fitchii*	None	Native
Turkey-mullein	*Croton setiger*	None	Native
Wild carrot	*Daucus pusillus*	None	Native
Threeray tarweed	*Deinandra lobbii* [*Hemizonia lobbii*]	None	Native
Salinas river tarweed	*Deinandra* [*Hemizonia*] *pentactis*	None	Native
Flax-leaved horseweed	*Erigeron* [*Conyza*] *bonariensis*	None	Introduced
Hairy flowered buckwheat	*Eriogonum nudum* var. *pubiflorum*	None	Native
White stemmed filaree	*Erodium brachycarpum*	None	Introduced

Common Name	Scientific Name	Special Status	Origin
Yellow monkeyflower	*Erythranthe guttata*	None	Native
Phlox leaved bedstraw	*Galium andrewsii*	None	Native
Mustard	*Hirschfeldia incana*	None	Introduced
Smooth cats ear	*Hypochaeris glabra*	None	Introduced
Common toad rush	*Juncus bufonius*	None	Native
Narrowleaf cottonrose	*Logfia* [*Filago*] *gallica*	None	Introduced
Miniature lupine	*Lupinus bicolor*	None	Native
Chick lupine	*Lupinus microcarpus*	None	Native
White horehound	*Marrubium vulgare*	None	Introduced
Annual yellow sweetclover	*Melilotus indicus* [*M. indica*]	None	Introduced
Q tips	*Micropus californicus*	None	Native
Holly leaf navarretia	*Navarretia atractyloides*	None	Native
Curvepod yellow cress	*Rorippa curvisiliqua*	None	Native
Curly dock	*Rumex crispus*	None	Introduced
Pacific sanicle	*Sanicula crassicaulis*	None	Native
Oak mistletoe	*Phoradendron villosum* subsp. *villosum*	None	Native
Vinegarweed	*Trichostema lanceolatum*	None	Native
Clover	*Trifolium* sp.	None	Native
Rose clover	*Trifolium hirtum*	None	Introduced
Western vervain	*Verbena lasiostachys*	None	Native
Davy's centaury	*Zeltnera*[*Centaurium*] *davyi*	None	Native
Grasses - 13 Species			
Slender oat	*Avena barbata*	None	Introduced
Ripgut brome	*Bromus diandrus*	None	Introduced
Soft chess	*Bromus hordeaceus*	None	Introduced
Foxtail brome	*Bromus madritensis* subsp. *rubens*	None	Introduced
Orchardgrass	*Dactylis glomerata*	None	Introduced
Italian rye grass	*Festuca perennis [Lolium multiflorum]*		
Rattail grass	*Festuca myuros* [*Vulpia myuros* var. *hirsuta*]	None	Introduced
Foxtail barley	*Hordeum murinum*	None	Introduced

Initial Study – Environmental Checklist

Common Name	Scientific Name	Special Status	Origin
California melic	*Melica californica*	None	Native
Coast range melic	*Melica imperfecta*	None	Native
Hood canarygrass	*Phalaris paradoxa*	None	Introduced
Annual beard grass	*Polypogon monspeliensis*	None	Introduced
Nodding needle grass	*Stipa* [*Nassella*] *cernua*	None	Native

Wildlife Resources

Wildlife surveys conducted in July 2019 identified 17 species or subspecies of wildlife in the Study Area. The list includes 1 reptile species, 12 bird species, and 4 mammal species. Other species could occur as transients, particularly avian fauna. One special status species (white-tailed kite) was observed. Other wildlife species observed included red-tailed hawk (Buteo jamaicensis), acorn woodpecker (Melanerpes formicivorus), brush rabbit (Sylvilagus bachmani) and California ground squirrel (Otospermophilus beecheyi). One dead grey pine outside of the Study Area contains a large stick nest likely used by raptors.

Table 7 -- Wildlife Resources

Common Name	Scientific Name	Special Status	General Habitat Preference
Reptiles – 1 species			
Coast range [western] fence lizard	*Sceloporus occidentalis bocourtii*	None	Wide range; variety of habitats
Birds – 12 species			
California scrub-jay	*Aphelocoma californica*	None	Oak, riparian woodlands
Red-tailed hawk	*Buteo jamaicensis*	None	Open, semi-open country
California quail	*Callipepla californica*	None	Shrubby habitats
Turkey vulture	*Cathartes aura*	None	Open country
American crow	*Corvus brachyrhynchos*	None	Many habitats, esp. urban
White-tailed kite	*Elanus leucurus*	FP (nesting)	Nests in dense live oaks
House finch	*Haemorhous mexicanus*	None	Riparian, grasslands, chaparral, woodlands, urban
Acorn woodpecker	*Melanerpes formicivorus*	None	Oak woodland, urban areas with oaks
Bushtit	*Psaltriparus minimus*	None	Woodlands, chaparral
European starling	*Sturnus vulgaris*	None	Agricultural, livestock areas
Western kingbird	*Tyrannus verticalis*	None	Grasslands, savannah
Mourning dove	*Zenaida macroura*	None	Open and semi-open habitats
Mammals – 4 species			
Mule deer	*Odocoileus hemionus*	None	Grasslands, woodlands
California ground squirrel	*Otospermophilus beecheyi*	None	Grasslands
Brush rabbit	*Sylvilagus bachmani*	None	Brushy habitats
Valley pocket gopher	*Thomomys bottae*	None	Variety of habitats

Figure 8 -- Habitats of the Project Site

Discussion

(a) *Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Special-Status Plants

A review of each special status species reported from the region and the available habitats and conditions in the Study Area indicate there are seven special status plant species that have potential to occur in the Study Area (Table 8) which includes the Federal and California State status, Global and State rank, CRPR, typical blooming periods and habitat requirements (CNPS 2019). An assessment of the potential to occur in the Study Area is also provided. Species are listed alphabetically by scientific name.

Table 8 -- Special Status Plants

	Common Name	Scientific Name	Federal/ State Status	Global/ State Rank	CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
1.	**Douglas' fiddleneck**	*Amsinckia douglasiana*	-/-	G4/S4	4.2	Mar-May	Cismontane woodland, Valley and foothill grassland	Low. Suitable grassland habitat is present in the Study Area.
2.	**Salinas milk-vetch**	*Astragalus macrodon*	-/-	G4/S4	4.3	Apr-Jul	Chaparral (openings), Cismontane woodland, Valley and foothill grassland	Low. Marginally suitable soils are present in the Study Area.
3.	**Lemmon's jewelflower**	*Caulanthus lemmonii*	-/-	G3/S3	1B.2	Feb-May	Pinon & juniper woodlands | Valley & foothill grassland	Low. Suitable grassland habitat is present in the Study Area.
4.	**Small-flowered gypsum-loving larkspur**	*Delphinium gypsophilum* ssp. *parviflorum*	-/-	G4T2T3Q/S2S3	3.2	(Mar)Apr-Jun	Cismontane woodland, Valley and foothill grassland	Low. Suitable grassland and woodland habitats are present in the Study Area.
5.	**Pale-yellow layia**	*Layia heterotricha*	-/-	G2/S2	1B.1	Mar-Jun	Cismontane woodland | Coastal scrub | Pinon & juniper woodlands | Valley & foothill grassland	Low. Marginally suitable clay loam soils are present in the Study Area.
6.	**Davidson's bush-mallow**	*Malacothamnus davidsonii*	-/-	G2/S2	1B.2	Jun-Jan	Chaparral | Cismontane woodland | Coastal scrub | Riparian woodland	Low. Suitable woodland habitat is present in the Study Area.
7.	**Shining navarretia**	*Navarretia nigelliformis* ssp. *radians*	-/-	G4T2/S2	1B.2	(Mar)Apr-Jul	Cismontane woodland | Valley & foothill grassland | Vernal pool | Wetland	Low. Marginally suitable clay loam soils are present in the Study Area.

A discussion of each species' known habitat, range, occurrences, potential to occur, and survey results for the Study Area are provided below.

Douglas' fiddleneck (*Amsinckia douglasiana*) is a CRPR 4.2 species endemic to California. It is known to occur in dry, unstable shaly sedimentary slopes in grassland and woodland habitats below 1,850 meters elevation. It is an annual herb that typically blooms between March and May. The closest known record is approximately 3.7 miles northeast of the Study Area (CCH CR44). Soils derived from shale and sandstone are present in the Study Area but are marginally suitable compared to typical

Douglas' fiddleneck habitat. Douglas' fiddleneck was not detected in the Study Area during the summer 2019 survey or spring 2020 survey.

Salinas milk vetch (*Astragalus macrodon*) is a CRPR 4.3 species that occurs from San Benito County south to San Luis Obispo County and east to Kern County and is endemic to California. It is known to occur in cismontane woodland, chaparral and grassland habitats often on sandstone, shale, or serpentinite substrates between 250 to 950 meters elevation. It is a perennial herb that typically blooms between April and July. The closest known record is approximately 4.2 miles northwest of the Study Area (CCH SBBG124767). The soil in the Study Area is marginally suitable for this species but is unlikely to occur in the relatively disturbed habitat of the Study Area. Salinas milk vetch was not detected in the Study Area during the appropriately timed 2019 summer survey.

Lemmon's jewel-flower (*Caulanthus lemmonii*) is a CRPR 1B.2 subspecies endemic to California. It is known to occur on dry, exposed slopes in grassland and pinyon and juniper woodland habitats between 80 and 1,580 meters elevation. It is an annual herb that typically blooms between February and May. The closest known record is approximately 3.2 miles southeast of the Study Area (CNDDB #22). Steep hillsides in the Study Area are marginally suitable for these species; however it is unlikely to occur due to an overgrowth of annual grasses. Lemmon's jewel-flower was not detected during the summer 2019 survey or spring 2020 survey.

Small-flowered gypsum-loving larkspur (*Delphinium gypsophilum* ssp*. parviflorum*) is a CRPR 3.2 subspecies endemic to Monterey and San Luis Obispo Counties. It is known to occur on rocky clay, sometimes serpentine soil, in cismontane woodlands and grasslands habitats between 190 and 350 meters elevation. It is a perennial herb that typically blooms between March and June. The closest known record is approximately 3.1 miles north of the Study Area (CCH CDA29605). Marginally suitable habitat is present in the Study Area; however, this species is unlikely to occur in the soils present within the Study Area. Small-flowered gypsum-loving larkspur was not detected during the summer 2019 survey or spring 2020 survey.

Pale-yellow Layia (*Layia heterotricha*) is a CRPR 1B.1 species endemic to central California. It is known to occur on alkaline or clay soils in cismontane woodland, chaparral, and grassland habitat between 300 and 1,705 meters elevation. It is an annual herb that typically blooms between March and May. The closest known record is approximately 2.3 miles northwest of the Study Area (CNDDB #12). Marginally suitable habitat is present in the Study Area; however, this species is unlikely to occur in soils present within the Study Area. Pale- yellow layia was not detected during the summer 2019 survey or spring 2020 survey.

Davidson's bush mallow (*Malacothamnus davidsonii*) is a CRPR 1B.2 species that occurs from San Mateo County south to Los Angeles County and is endemic to California. It is known to occur in chaparral, coastal scrub, cismontane woodland, and riparian woodland habitats between 185 and 1,140 meters elevation. It is a perennial deciduous shrub that typically blooms between June and January. The closest known record is approximately 3.0 miles northwest of the Study Area (CNDDB #89). The woodland habitat in the Study Area is marginally suitable for this species, but it is only known to occur in one locality within the county and is unlikely to occur in the Study Area. Davidson's bush mallow was not detected during the appropriately timed summer 2019 survey.

Shining navarretia (*Navarretia nigelliformis* ssp. *radians*) is a CRPR 1B.2 subspecies endemic to California, primarily occurring in central California. It is known to occur in vernal pools, grassland, and cismontane woodland habitats, often on clay and alkaline sites between 65 and 1,000 meters elevation. It is an annual herb that typically blooms between (March) April and July. The closest known

record is approximately 3.7 miles northeast of the Study Area (CNDDB #49). The soils and grassland habitat are marginally suitable for this species. Shining navarretia was not detected during the summer 2019 survey or spring 2020 survey.

Botanical surveys conducted in July 2019 were timed to identify two special status plants with potential to occur, Davidson's bush-mallow and Salinas milk vetch, which were not present.

Special Status Wildlife

Literature review of records of special status animal occurrences within the Study Area identified 36 special status animal species are known to occur in the region. Figure 6 of the BRA depicts the current GIS data for special status wildlife species and critical habitat mapped in the vicinity of the Property by the CNDDB and the United States Fish and Wildlife Service (USFWS). No critical habitat for listed species is present within the Study Area.

Potential special status animals that could occur in the Study Area were determine based the available habitats present and the known range and habitat requirements of each species. A total of 11 special status animal species have potential to occur in the Study Area (Table 9). Federal and California State status, Global and State rank, and CDFW status is provided for each species. Typical nesting or breeding period, habitat preference (from CNDDB), and potential to occur in the Study Area are provided. Species are listed alphabetically by scientific name.

Table 9 -- Special Status Wildlife Species

	Common Name	Scientific Name	Federal/ State Status	Global/State Rank	CDFW Status	Nesting/ Breeding Period	Habitat Preference	Potential to Occur
1.	**Grasshopper sparrow**	*Ammodramus savannarum*	-/-	G5/S3	SSC (nesting only)	March 15 - August 15	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes.	Low. Marginally suitable grassland habitat is present in the Study Area.
2.	**Northern California legless lizard**	*Anniella pulchra*	-/-	G3/S3	SSC	May - September	Sandy or loose loamy soils under sparse vegetation.	Moderate. Suitable habitat is present in the Study Area.
3.	**Pallid bat**	*Antrozous pallidus*	-/-	G5/S3	SSC	Spring - Summer	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	Moderate. Potential roosting habitat is present in oak woodland.
4.	**Golden eagle**	*Aquila chrysaetos*	-/-	G5/S3	WL/FP	March 15 - August 15	Rolling foothills, mountain areas, sage-juniper flats, and desert.	Low. Potential nesting habitat is present, but there is high human disturbance within the Study Area.
5.	**Burrowing owl**	*Athene cunicularia*	-/-	G4/S3	SSC	March 15 - August 15	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	Moderate. Suitable grassland habitat is present in the Study Area.
6.	**White-tailed Kite***	*Elanus leucurus*	-/-	G5/S3S4	FP	March 15 - August 15	Nests in dense tree canopy near open foraging areas	High. Suitable nesting habitat present. Species seen in the Study Area.
7.	**Bald eagle**	*Haliaeetus leucocephalus*	Delisted/ CE	G5/S3	FP	March 15 - August 15	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water.	Low. Suitable nesting habitat present, but there is high human disturbance within the Study Area.
8.	**Hoary bat**	*Lasiurus cinereus*	-/-	G5/S4	SA	Spring-Fall	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for	Moderate. Suitable roosting habitat present in the Study Area.
9.	**Fringed myotis**	*Myotis thysanodes*	-/-	G4/S3	SA	Spring - Summer	In a wide variety of habitats, optimal habitats are pinyon-juniper, valley foothill hardwood & hardwood-conifer.	Moderate. Suitable foraging habitat is present in the Study Area and only low quality roosting habitat is present.
10.	**Yuma myotis**	*Myotis yumanensis*	-/-	G5/S4	SA	Spring - Summer	Optimal habitats are open forests and woodlands with sources of water over which to feed.	Moderate. Suitable foraging habitat is present but marginal roosting habitat is present.
11.	**American badger**	*Taxidea taxus*	-/-	G5/S3	SSC	February – May	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	High. Suitable grassland habitat and abundant prey are present in the Study Area.

Special-status Reptiles

Northern California legless lizard (*Anniella pulchra*) is a California Species of Special Concern that occurs from Contra Costa to Santa Barbara County. It has a Global Rank of G3 and a State Rank of S3, both of which indicate that this species is considered Vulnerable. This species includes the subspecies formerly treated as *A. pulchra nigra* and *A. pulchra pulchra* which was shown to be an invalid designation (Pearse and Pogson 2000). Northern California legless lizard inhabits friable soils in a variety of habitats from coastal dunes to oak woodlands and chaparral. Adapted to subterranean life, the legless lizard thrives near native coastal shrubs that produce an abundance of leaf litter and have strong roots systems (Kuhnz et al. 2005). Areas of exotic vegetation and open grassland do not provide suitable habitat for the silvery legless lizard since these plant communities support smaller populations of insect prey and offer little protection from higher ground temperatures and soil desiccation (Slobodchikoff and Doyen 1977; Jennings and Hayes 1994). The closest reported occurrence of the northern California legless lizard is located approximately 3.3 miles northeast of the Study Area (CNDDB #62). The friable clay loam soils and oak woodland habitat in the Study Area is potential habitat for the northern California legless lizard. No northern California legless lizards were observed in the Study Area during 2019 summer wildlife surveys.

California legless lizard may be present in areas of loose soils and leaf litter, which are primarily limited to oak woodland habitats. Ground disturbing activities associated with removal of oak trees and other vegetation during construction of the Project could result in injury or mortality of legless lizards.

Special-status Mammals

Roosting bats and/or maternal bat colonies may be present in the foliage, cavities, or loose bark of mature oak trees in the Study Area. Loss of potential roosting and foraging habitat for special status bats would occur if oak trees are trimmed or removed due to Project activities. Loss of habitat would be minimized and mitigated by implementation of oak tree mitigation measures BR-1 to BR-10.

Hoary bat (*Lasiurus cinereus*) is a Special Animal tracked by CDFW. It is widely distributed throughout most of California, though it is uncommon in southeastern deserts. Roosting habitat is primarily woodlands and forests, and it forages for moths in open areas and along habitat edges (CDFW 2014). Hoary bats roost mainly in dense foliage of medium to large deciduous or coniferous trees, near the ends of branches, typically in trees at the edge of a clearing. Roosting has also been documented in caves, under rock ledges, and in tree hollows (Bolster 2005). The closest reported occurrence of hoary bat is located approximately 5.6 miles northeast of the Study Area (CNDDB #111). Suitable roosting habitat is present in oak woodlands within the Study Area, and this species has moderate potential to occur. Hoary were not observed in the Study Area during 2019 summer wildlife survey, though a focused survey for bat roosts was not conducted as part of this study.

Fringed Myotis (*Myotis thysanodes*) is a Special Animal tracked by the California Department of Fish and Wildlife. It is found throughout much of the western U.S., south from British Columbia to California and East to Montana, Colorado, and parts of Texas. This is a colonial bat that is most active from April through September with mating occurring in fall. Fringed Myotis prefer to roost in caves, mines, buildings, and other protected locations among oak, pinon, and juniper forests where they feed on a diet of moths and other insects (CDFW 2014). The nearest known occurrence is over 15 miles southwest of the Study Area, near San Simeon Creek (CNDDB #46). The oak woodland within the Study Area provides potentially suitable though suboptimal roosting habitat, and fringed myotis are moderately likely to occur. Fringed myotis were not observed during the summer 2019 wildlife surveys, though a focused survey for bat roosts was not conducted as part of this study.

Yuma Myotis (*Myotis yumanensis*) is a Special Animal tracked by the California Department of Fish and Wildlife. The species is a small bat widely distributed throughout western North America and is the species of bat most commonly associated with man-made structures. It is often associated with permanent water sources. Crevices are preferred roost areas including those found in cliffs, buildings and bridges, although it will also roost in tree cavities (Bogan et al. 2005). The species emerges after sunset and forages on insects (CDFW 2014). The nearest known occurrence is over 15 miles southwest of the Study Area, near San Simeon Creek (CNDDB #40). There are no suitable structures for roosting within the Study Area, though oak trees may provide suboptimal roost sites; the open oak woodland in the Study Area provides suitable foraging habitat. Yuma myotis were not observed during the 2019 wildlife survey, though a focused survey for bat roosts was not conducted as part of this study.

Pallid bat (*Antrozous pallidus*) is a California Species of Special Concern. The pallid bat is a large long-eared bat that occurs throughout the state and occupies a wide variety of habitats. Although most common in open, dry areas ideal for foraging with rocky outcrops for roosting, pallid bats are also found regularly in oak and pine woodlands where they roost in caves, mines, rock crevices, hollow trees and buildings (Nowak et al. 1994). Bridges are also frequently used by pallid bats, often as night roosts between foraging periods (Pierson et al. 1996). The closest reported occurrence of the pallid bat is approximately 7.8 miles northeast of the Study Area (CNDDB #213). Due to the variety of habitats this species occupies, and the presence of suitable woodland habitat for roosting and open grassland habitat for foraging, the pallid bat has moderate potential to occur in the Study Area. No pallid bats were observed during site during the 2019 summer wildlife surveys, though a focused survey for bat roosts was not conducted as part of this study.

American badger (*Taxidea taxus*) is a California Species of Special Concern with a widespread range across the state (Brehme et. al. 2015; CDFW 2014). It is a permanent but uncommon resident in all parts of California, except for forested regions of the far northwestern corner, and is more abundant in dry, open areas of most shrub and forest habitats. The American badger requires friable soil in order to dig burrows for cover and breeding. The main food source for the species is fossorial rodents, mainly ground squirrels and pocket gophers (CDFW 2014). The breeding season for badgers is in summer and early fall, and females give birth to litters usually in March and April (CDFW 2014). The closest reported occurrence of the American badger is 4.3 miles northeast of the Study Area (CNDDB #375). The grassland and woodland habitats of the Study Area support a large prey source of small mammals and the friable soils indicate the Study Area is suitable for American badgers. No American badgers or sign of badgers such as dens or dig-outs, were observed during the 2019 wildlife survey.

American badger was not present in the Study Area during our 2019 surveys. Because badgers are highly mobile species with known occurrences in the region, it is possible a badger could occupy a den site in or near Study Area in the future. Direct impacts to American badger may occur during construction as a result of vehicle strikes, or during excavation activities, if there are occupied dens on-site or adjacent to the area of disturbance. Increased short and long-term anthropogenic activity in the vicinity of viable populations located outside of project area also have a potential to indirectly impact this species by removal of habitat, increased light-pollution, and potential primary and secondary exposure to agricultural chemicals including rodenticides.

Special-status and Nesting Birds

Five special status bird species, including bald eagle, golden eagle, white-tailed kite, grasshopper sparrow, and burrowing owl, have potential to occur in the Study Area. Vegetation removal, grading, or construction activities could impact nesting special status birds if these activities occur during nesting bird season (February 1 to August 31).

Grasshopper sparrow (*Ammodramus savannarum*) is a California Species of Special Concern (nesting occurrences only) that is distributed across California west of the Cascade-Sierra Nevada crest, primarily as a summer resident from March to September. It has been seen as far north as Del Norte County, with a single disjunct population in Siskiyou County, and more scattered populations as far south as San Diego County. The breeding season is generally April to July with the peak being in May and June (CDFW 2014). This bird prefers large dense, dry grasslands on rolling hills, lowland plains, lower mountain slopes, and valleys with scattered sage shrubs for perching (CDFW 2014; CDFW 2019). The bird needs grassland with patches of bare ground, which is important for its foraging behavior. Nests are built in grasses and forbs near the ground (CDFW 2014). It has been found that predation on nests is decreased by increased forb and grass cover (Sutter and Ritchison 2005). The grasshopper sparrow's main food source is grasshoppers but it also eats other insects and seeds of pigweed, knotweed, campion, and oats (Shuford and Gardali 2008). The nearest recorded occurrence of this species is over 13 miles southwest, east of Cambria (CNDDB #7). The grassland habitat of the Study Area is only marginally suitable nesting habitat for this species, and there have been no reported sightings in the immediate vicinity (eBird 2019), therefore this species is unlikely to occur. Grasshopper sparrows were not observed in the Study Area during the 2019 summer wildlife surveys.

Golden eagle (*Aquila chrysaetos*) is designated a Fully Protected species by the CDFW and is federally protected by the Bald and Golden Eagle Protection Act. The species range extends throughout much of North America and in California. Most golden eagles in California are residents year-round, but in the winter months this population will be augmented with individuals from other nearby western states. The breeding season in California is generally from late January through August. The golden eagle prefers open habitat, and in California, it extensively utilizes grazed grasslands and open shrublands for preying on its main food source of hares or rabbits and marmots or ground squirrels (Hunt 1995; Watson 2010). In California, the golden eagle nests almost exclusively in trees (82% trees in central California) but in montane regions it also has a preference for cliffs and will avoid nesting in densely forested habitat (Hunt 1995; Pagel et al. 2010). The golden eagle is highly sensitive to anthropogenic presences and will avoid nesting near urban areas (Pagel et al. 2010). Golden eagles will even abandon nests when human activity and development increases in their territory (Driscoll 2010). Golden eagles have been observed within a quarter mile of the Study Area, around Lake Nacimiento (eBird 2019). While there is potentially suitable nesting habitat in oak trees within the Study Area, the history of disturbance and proximity to human activity means there is low potential for golden eagles to occur. No golden eagles were observed during the 2019 summer wildlife survey.

Burrowing owl (*Athene cunicularia*) is a California Species of Special Concern. It is a small, rare owl that occupies abandoned mammal holes in the ground, most notably those of the California ground squirrel (*Spermophilus beecheyi*). In California, the burrowing owl is a year-round resident in the Carrizo Plain, Central Valley, Imperial Valley and the San Francisco Bay region. In the winter months, burrowing owl individuals from other western populations will augment the year-round Californian populations (Shuford and Gardali 2008). The breeding season is generally from March through August. Suitable habitat types for the burrowing owl are dry, open annual or perennial grasslands and deserts with an

abundance of burrows (CDFW 2014; CDFW 2019). More specifically, the owl is found in coastal prairie, coastal scrub, Great Basin scrub, Mojavean scrub, Sonoran Desert scrub, valley and foothill grassland habitats (CDFW 2019). The burrowing owl commonly nests in abandoned holes in the ground, most notably those of the California ground squirrel, but the owl is also known to inhabit badger and fox dens and man-made holes, such as pipes and culverts. Rarely, it has been known to dig its own burrow in softer soil types (Coulombe 1971; Shuford and Gardali 2008). Burrows with high horizontal visibility and low vegetation coverage are preferred but burrows with dense vegetation with high perch sites will be used (Green and Anthony 1989). Orthoptera are the main food source for the owl but it will also consume other insects, as well as amphibians, carrion, small mammals, reptiles and birds (York et al. 2002; Shuford and Gardali 2008; CDFW 2014). The closest reported occurrence of the burrowing owl is approximately 5.2 miles northeast of the Study Area (CNDDB #591). The relatively small area of open grassland within the Study Area means burrowing owls are only moderately likely to occur. Burrowing owls were not observed in the Study Area during the summer 2019 wildlife surveys.

White-tailed kite (*Elanus leucurus*) is a CDFW Fully Protected species that can be found throughout California but is known to forage and nest in certain areas of California in fluctuating numbers (CDFW 2018b; Lehman 2018). The species nests primarily in evergreen trees, especially coast live oaks, near meadows, marshes, farmlands or grasslands where it forages on small animals, especially voles (Dunk 1995). Communal nocturnal roosts sites, which may shift in location, are often used from early fall to early winter. Though there are no documented occurrences of nearby nesting white-tailed kites, this species is seen regularly around Lake Nacimiento and in the immediate vicinity (eBird 2019). Potential nesting habitat is present in mature oak trees within the Study Area. Three white-tailed kites were observed in the Study Area during summer 2019 wildlife surveys.

Bald eagle (*Haliaetus leucocephalus*) is a state listed endangered species and a regular winter resident on Lake Nacimiento. It requires ocean shores, lakes or rivers and usually nests in large trees with open branches within 1 mile of water. They often nest in the largest tree in a stand, building a large stick platform nest between 50 to 200 feet above ground (CDFW 2014). Bald eagles forage from a perch or in flight, and most frequently prey on fish. They also scavenge dead fish, birds, and mammals. Bald eagles are known to be sensitive to human disturbance, and have abandoned nests due to human activity (Thelander 1973). The closest known record for a bald eagle nest is 3.9 miles southwest of the Study Area (CNDDB #215) along Las Tablas Creek near Lake Nacimiento; however bald eagles are seen regularly in the immediate vicinity of the Study Area (eBird 2019). Tall pine trees in and near the Study Area provide suitable nesting habitat for this species, however the history of disturbance and proximity to human activity means there is low potential for bald eagles to occur. Bald eagles were not observed during the 2019 summer wildlife survey.

Nesting Birds. Impacts to, or take of, nesting birds could occur if vegetation removal, grading, or construction activities are conducted during nesting season (February 1 through August 31). Direct and indirect impacts may occur if tree trimming/removals are proposed as a part of the project and occur during nesting season. In addition, impacts may occur due to habitat loss (e.g. grassland) or project-related disturbances that may deter nesting or cause nests to fail during construction.

Based on the preceding analysis, project impacts to special-status species is considered *less than significant with mitigation.*

(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Riparian habitat

Potentially jurisdictional wetlands and waters occur in the Study Area. Two ephemeral drainage features in the Study Area were mapped using GPS points taken in the field based on visual estimates of hydrology. Formal wetland delineation methods according to USACE guidelines were not conducted, therefore no determination of agency jurisdiction was made.

However, all project activities are expected to occur at least 50 feet from the top of bank. Though no direct impacts are proposed to the hydrological resources, indirect impacts may occur to jurisdictional aquatic habitats as a result of silt and sedimentation from project construction activities. This impact is considered *less than significant with mitigation*.

CDFW Sensitive Natural Communities

The proposed project would impact up to 2.5 acres of needle grass – melic grass grassland habitat. This impact is considered *less than significant with mitigation*.

(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed Project could result in up to 375 linear feet of direct and/or indirect impacts to potential jurisdictional waters. Direct impacts to both drainages could occur from the extension of Heritage Road and construction of the storage units and parking areas. Direct or indirect impacts to the southern drainage could occur if/when the southern area of the Study Area is developed in the future. Grading and construction activities around the drainages could result in indirect impacts from erosion and sedimentation of disturbed ground. This impact is considered *less than significant with mitigation*.

(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Maintaining connectivity between areas of suitable habitat is critical for dispersal, migration, foraging, and genetic health of plant and wildlife species. The project site is in a semi-rural area of San Luis Obispo County with extensive oak woodlands and grasses to the north, and east. Existing barriers to migration to and from non-developed portions of the project site, particularly for wildlife, are influenced by urban and semi-urban development in the area, which typically correlates with a high frequency of human activity, land manipulation, wildlife-exclusion fences, and pest management activities. As a result, natural habitat features are currently somewhat fragmented especially to the south within Heritage Ranch. New localized barriers may be created by the construction of permanent structures and fencing, which may deter general wildlife movement through the area; however, the project site is located on the fringe of the Heritage Ranch urban area with ample opportunities for wildlife to travel around the project site. Further, no passage barriers through aquatic features are proposed as a part of the project. Therefore, the proposed project is not expected to increase the overall level of fragmentation in the region, and impacts *would be* less than significant.

(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The County of San Luis Obispo Oak Woodland Ordinance was adopted in April 2017 to regulate the clear-cutting of oak woodlands. This ordinance applies to sites located outside of Urban or Village areas within the inland portions of the county (not within the Coastal Zone). "Clear-cutting" is defined as the removal of one acre or more of contiguous trees within an oak woodland from a site or portion of a site for any reason, including harvesting of wood, or to enable the conversion of land to other land uses. "Oak woodland" includes the following species: Blue oak (Quercus douglasii), coast live oak (Quercus agrifolia), interior live oak (Quercus wislizeni), valley oak (Quercus lobata), and California black oak (Quercus kelloggii). The ordinance applies to clear-cutting of oak woodland only and does not apply to the removal of other species of trees, individual oak trees (except for Heritage Oaks), or the thinning, tree trimming, or removal of oak woodland trees that are diseased, dead, or creating a hazardous condition. Heritage oaks are any individual oak species, as defined in the Oak Woodland Ordinance, of 48 inches diameter at breast height (dbh) or greater, separated from all Stands and Oak Woodlands by at least 500 feet. Minor Use Permit approval is required to remove any Heritage Oak.

The proposed Project would impact up to 0.7 acres of oak woodland habitat. According to the tree inventory provided with the project application materials, there are a total of 168 mature oak trees on the project site. Of these, eight blue oak trees (*Quercus douglisii*) will be removed and 50 will be impacted. Mitigation measure BIO-9 requires replacement trees to be planted at a ratio of four trees for every one tree removed (4:1). This impact is considered *less than significant with mitigation*.

(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project is not located within an area governed by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with the provisions of an adopted plan and *no impacts would occur.*

Conclusion

Upon implementation of mitigation measures BIO-1 through BIO-22 to reduce potential impacts to special-status wildlife and native oak trees, potential impacts to biological resources would be less than significant.

Mitigation

Oak Trees

BIO-1 An oak tree mitigation plan shall be prepared by a Certified Arborist and approved by the County of San Luis Obispo. The mitigation plan shall incorporate the most current County standards for mitigating impacts to oak and pine trees, and oak woodland habitat.

BIO-2 Impacts to the oak canopy or critical root zone (CRZ) should be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-3 Prior to groundbreaking, tree protection fencing shall be installed as close to the outer limit of the CRZ as practicable for construction operations. The fencing shall be in place throughout the duration of the project, and removed only under the direction of the project's Certified Arborist.

BIO-4 Trenching within the CRZ must be approved by the project's Certified Arborist, and shall be done by hand or with an air spade. Any roots exposed during construction shall be evaluated and treated by the project's Certified Arborist.

BIO-5 Landscape material within the CRZ must be of native, drought tolerant species. Lawns are prohibited within the CRZ.

BIO-6 Paving adjacent to, and within the CRZ shall utilize interlocking pavers or equivalent that will allow proper infiltration of water and exchange of oxygen to the root zone of the tree.

BIO-7 Tree removal, if approved, shall commence within 30 days of inspection by a qualified biologist to determine the tree is not being used by nesting birds or bats at the time of removal.

BIO-8 Impacts to oak trees shall be assessed by a Certified Arborist. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-9 Impacts to native trees shall be mitigated by planting additional trees on site. Any oak tree with a dbh of five inches or greater shall require mitigation. Oak trees removed shall be replaced in kind at a 4:1 ratio. Impacts to oak trees shall be mitigated by planting additional oak trees, in kind, at a 2:1 ratio. Replacement trees shall be of one-gallon size, of local origin, and of the same species as was impacted. Replacement trees shall be seasonally maintained and monitored annually for at least seven years.

BIO-10 Prior to commencement of Project construction activities, tree protection fencing shall be installed along the outer limit of the critical root zone (1.5 times the trunk diameter) of all oak trees within 50 feet of Project activities. The fencing shall be in place for the duration of the construction occurring within 50 feet of the trees. Where approved Project activities are within the critical root zone, fencing shall be temporarily moved to facilitate the work. A Certified Arborist shall be present during approved Project activities within the critical root zone to document impacts to the trees, and shall provide a written report to the County of any mitigation obligation.

Native Grassland

BIO-11 A County-approved biologist shall develop a Native Perennial Grassland Restoration Plan that provides specific measures to enhance and maintain the remaining on-site occurrences of needle grass – melic grass grassland to be approved by the County. This Plan shall be focused on adaptive management principles, and shall identify detailed enhancement areas and strategies based on the parameters outlined below, with timing and monitoring long-term requirements. The Plan shall:

a. Provide an up-to-date inventory of on-site occurrences of native perennial grassland habitat;

b. Define attainable and measurable goals and objectives to achieve through implementation of the Plan;

c. Provide site selection and justification;

d. Detail restoration work plan including methodologies, restoration schedule, plant materials (seed), and implementation strategies.

e. Provide a detailed maintenance plan to include mowing to provide a sufficient disturbance regime to keep non-native plant species from further reducing the extent of this habitat type on the property over time. This approach would also have the residual benefit of providing wildland fire protection. Enhancement and maintenance options shall employ recent techniques and effective strategies for increasing the overall area of native perennial grassland on-site and shall include but not be limited to reseeding disturbed areas with an appropriate native plant palette;

f. Define performance standards within the agriculture residential cluster subdivision project area, the restored area shall include at least a 2: 1 ratio with at least 10 percent cover by native perennial grasses; and,

g. Provide a monitoring plan to include methods and analysis of results. Also, include methodology to determine success or failure of restoration enhancement and an adaptive management plan.

Surface Water Quality

BIO-12 A SWPPP shall be developed and implemented. Construction activities shall implement Best Management Practices to adequately address prevention of sedimentation into drainages. The plan shall include a schedule of BMP inspection and maintenance.

BIO-13 All hazardous materials shall be properly stored within secondary containment. All portable generators and portable toilets shall also be staged within secondary containment.

BIO-14 Construction activities within 100 feet of drainages should be scheduled to the maximum extent practicable to occur outside of the rainy season (November through April).

BIO-15 Project activity occurring within 50 feet of aquatic habitat (e.g., swales, drainages, ponds, vernal pool, etc., identified in biological report) shall occur during the dry season (between June 1 and September 31). For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining controls, which shall be implemented to prevent erosion and sedimentation into drainages and wetlands. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other

industry standard materials. These controls shall be installed and maintained for the duration of the project.

BIO-16 No equipment fueling, hazardous materials storage, portable restrooms, concrete washouts, or overnight vehicle or equipment staging shall be permitted within 100 feet of aquatic features during construction.

BIO-17 **Protection of State Water and Wetlands (if present on site) -** Prior to project initiation, all applicable agency permits with jurisdiction over the project area (e.g., California Department of Fish and Wildlife [CDFW], Regional Water Quality Control Board) shall be obtained, as necessary. Any additional measures required by these agencies shall be implemented as necessary throughout the project.

Nesting Birds

BIO-18 **Pre-construction Survey for Sensitive and Nesting Birds.** If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to initial project activity beginning, including ground disturbance and/or vegetation removal/trimming. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active.

- A 50-foot exclusion zone shall be placed around non-listed, passerine species, and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius of 50 feet (non-listed passerine species) or 250 feet (raptor species). All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the young have fledged or that proposed project activities would not cause adverse impacts to the nest, adults, eggs, or young.
- If special-status avian species (aside from burrowing owl) are identified and nesting within the work area, no work will begin until an appropriate exclusion zone is determined in consultation with the County and any relevant resource agencies.
- The results of the survey shall be provided to the County prior to initial project activities. The results shall detail appropriate fencing or flagging of exclusion zones and include recommendations for additional monitoring requirements. A map of the project site and nest locations shall be included with the results. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended exclusion zone depending on site conditions and species (if non-listed).
- If two weeks lapse between different phases of project activities (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the nesting bird survey shall be repeated.

Legless Lizard

BIO-19 A focused preconstruction survey for legless lizards shall be conducted in proposed work areas immediately prior to ground-breaking activities that would affect potentially suitable habitat, as determined by the project biologist. The preconstruction survey shall be conducted by a qualified biologist familiar with legless lizard ecology and survey methods, and with approval from California Department of Fish and Wildlife to relocate legless lizards out of harm's way. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required. If legless lizards are found to be present in the proposed work areas the following steps shall be taken:

a. Legless lizards shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.

b. Construction monitoring shall be required for all new ground-breaking activities located within legless lizard habitat. Construction monitors shall capture and relocate horned lizards as specified above.

c. A letter report shall be submitted to the County and CDFW within 30 days of legless lizard relocation, or as directed by CDFW.

Burrowing Owl

BIO-20 **Pre-construction Survey for BUOW**. If work is planned to occur within 150 meters (approximately 492 feet) of BUOW habitat, a qualified biologist shall conduct a pre-construction survey for the species within 14 days prior to initial project activities. A second survey shall be completed immediately prior to initial project activities (i.e., within the preceding 24 hours). This applies year-round (i.e., within the breeding (February 1 to August 31) or non-breeding (September 1 to January 31) seasons. The pre-construction surveys shall be conducted to determine no burrowing owls are present in the work areas.

The surveys shall be consistent with the methods outlined in Appendix D of the CDFW 2012 Staff Report on BUOW Mitigation, which specifies that 7- to 20-meter transects shall be walked, such that the entire project area is visible. These surveys may be completed concurrently with SJKF, American badger, or other special-status species surveys.

If occupied BUOW burrows are identified the following exclusion zones shall be observed during project activities, unless otherwise authorized by CDFW:

Location	Time of Year	Level of Disturbance		
		Low	Medium	High
Nesting Sites	April 1 – Aug 15	656 feet	1,640 feet	1,640 feet
Nesting Sites	Aug 16 – Oct 15	656 feet	656 feet	1,640 feet
Any Occupied Burrow	Oct 16 – Mar 31	164 feet	328 feet	1,640 feet

Each exclusion zone shall encircle the burrow and have a radius as specified in the table above. All foot and vehicle traffic, as well as all project activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the burrow is no longer in use.

If two weeks lapse between construction phases (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the BUOW survey shall be repeated.

Bats

BIO-21 Prior to removal of any trees over 20 inches dbh, a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. The survey may include visual inspection of potential roost trees and/or acoustic surveys using bat detectors. If a non-maternal roost is found, the qualified biologist, with prior approval from California Department of Fish and Wildlife, will install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to

those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

American Badger

BIO-22 **Pre-construction survey for American badgers**. A qualified biologist shall complete a pre-construction survey for badgers no less than 14 days and no more than 30 days prior to the start of initial project activities to determine if badgers are present within proposed work areas, in addition to a 200-foot buffer around work areas. The results of the survey shall be provided to the County prior to initial project activities.

- If a potential den is discovered, the den will be monitored for 3 consecutive nights with an infra-red, motion-triggered camera, prior to any project activities, to determine if the den is being used by an American badger.
- If an active badger den is found, an exclusion zone shall be established around the den. A minimum of a 50-foot exclusion zone shall be established during the non-reproductive season (July 1 to January 31) and a minimum 100-foot exclusion zone during the reproductive season (February 1 to June 30). Each exclusion zone shall encircle the den and have a radius of 50 feet (non-reproductive season) or 100 feet (reproductive season), measured outward from the burrow entrance. All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the den is no longer in use. If avoidance is not possible during project construction or continued operation, the County shall be contacted. The County will coordinate with appropriate resource agencies for guidance.

  If more than 30 days pass between construction phases (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the badger survey shall be repeated.

V. CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
(c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Setting

San Luis Obispo County possesses a rich and diverse cultural heritage and has an abundance of historic and prehistoric cultural resources dating as far back as 9,000 B.C. The County protects and manages cultural resources in accordance with the provisions detailed by CEQA and local ordinances.

As defined by CEQA, a historical resource includes:

1. A resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR).
2. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant. The architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence.

The project site is located in an area of moderate archaeological sensitivity. Accordingly, a Phase I Archaeological Survey was prepared for the project site (Padre Associates, Inc., April 2020). The study is incorporated by reference. The following discussion is a summary of the findings and recommendations of that study.

The Project site is located in the rolling hills that surround Lake Nacimiento, which was artificially created in 1956. The underlying geology for most of the Project site is Holocene-aged alluvial gravel, sand and clay valleys (Qa) surrounded by exposures of the upper Cretaceous aged Atascadero Formation (Kas), which includes lenses of cobble conglomerate of meta andesitic volcanic and plutonic rocks and thin lenses of micaceous claystone (Dibblee and Minch, 2007). The area receives a mixture of coastal California and Mediterranean climates, but the primary climate is defined by long, hot, dry summers and brief, cool, sometimes rainy winters (Miles and Goudey, 1998). The predominant natural plant communities are Coast live oak series California sagebrush with some chaparral on the eastern side of the mountains (Miles and Goudey, 1998).

Archaeologists working in central California have generally recognized six major prehistoric periods of cultural adaptation within the last 10,000 years. Previous research in San Luis Obispo County has tended to assume that the Santa Barbara sequence developed by Chester King (1982) would be largely replicated in this northern extension of ethnographic Chumash territory (Fitzgerald and Jones, 1998). Jones (1993) has suggested that, despite ethnographic affiliations with the Santa Barbara Channel, archaeologists should consider San Luis Obispo County a district within the central California Coastal Region that also includes Santa Cruz and Monterey counties. The presence of major offshore islands and rich Channel fisheries facilitated development of an intensive, populous maritime culture in the Santa Barbara Channel. The absence of this resource base in San Luis Obispo County forced cultural elaborations along different trajectories (Fitzgerald and Jones, 1998).

The Project site is situated within the prehistoric territory of the Salinan tribe (Heizer and Whipple, 1971). The Salinans occupied a geographical area extending from present day San Luis Obispo in the south to King City in the north, and west to the coast (Breschini et al., 1983). The Salinan people were seasonally migratory and, depending on food resources, would inhabit the coastal beaches to procure marine resources, and the interior Santa Lucia mountain ranges for acorn and land mammal resources. It is probable that the Project site falls within the regional territory of the Migueleño group, which inhabited the upper course of the Salinas River.

Methods

Padre ordered an expedited records search from the Central Coast Information Center of the California Historical Resources Information System (CCIC-CHRIS) at the University of California, Santa Barbara on April 6, 2020. The records search included a review of all recorded historic-era and prehistoric archaeological sites within an 1/8-mile radius of the Project site, as well as a review of known cultural resource surveys and technical reports. Padre received the results on April 7, 2020.

During the records search, the following sources were consulted:

- CCIC base maps, USGS 7.5-minute series topographic quadrangles, and other historic maps;
- Pertinent survey reports and archaeological site records to identify recorded archaeological sites and historic-period built-environment resources (such as buildings, structures, and objects) within or immediately adjacent to the Project sites; and
- The California Department of Parks and Recreation's California Inventory of Historic Resources (1991) and the Office of Historic Preservation's Historic Properties Directory (2007), which combines cultural resources listed on the California Historical Landmarks, California Points of Historic Interest, and those that are listed in or determined eligible for listing in the NRHP or the CRHR.

Discussion

(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No historical resources within the definitions prescribed by Section 15064.5 were determined to be present on the project site. *No impacts would occur.*

(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

On April 13, 2020, Padre Senior Archaeologist Rachael J. Letter examined the 10.2-acre Project site for archaeological resources. The Project site was surveyed in transect intervals of no greater than 10 meters, where not constrained by dense vegetation and steep terrain.

According to Mr. CJ Rudolph, owner of Snug Harbor, LLC, most of the proposed storage facility site had been used as a dumping area by the Heritage Ranch Community Services District. An examination of aerial photographs confirmed that large stockpiles had been stored in this area since at least 1994 and were removed by 2018. The 2018 aerial photograph also demonstrated that almost half of the proposed storage facility site was subject to mass grading when the stockpiles were removed.

Evidence of this disturbance was observed during the pedestrian survey. Although slightly more vegetated, fragments of concrete, asphalt, modern terra cotta tile and red bricks, and imported gravel were observed throughout most of the proposed storage facility site.

To the northeast of the former stockpile area, the ground appeared to be recently disturbed from animal rooting, which provided excellent visibility in this portion of the Project site. No previous ground disturbance was observed within the potential future expansion area. The Project includes improvements to Heritage Road immediately southwest of the proposed facility entrance and the construction of a roundabout. These areas were also examined and found to consist of a graded pad covered with gravel.

No cultural materials were observed during the survey. Therefore, potential impacts relating to adverse change in the significance of an archaeological resource are *less than significant*.

(c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Based on existing conditions and results of the archaeological surface survey conducted onsite, buried human remains are not expected to be present in the site area. In the unlikely event that resources are uncovered during grading activities, implementation of LUO 22.10.040 (Archaeological Resources) would be required. This section requires that in the event archaeological resources are encountered during project construction, construction activities shall cease, and the County Planning and Building Department must be notified of the discovery so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and the disposition of artifacts may be accomplished in accordance with state and federal law. This protocol would ensure full compliance with California State Health and Safety Code Section 7050.5 as well as CDFA requirements regarding accidental discovery of cultural resources. Therefore, impacts related to a substantial adverse change in the significance of archaeological resources would be *less than significant*.

Conclusion

No archaeological or historical resources are known or expected to occur within or adjacent to the project site. In the event unanticipated archaeological resources or human remains are discovered during project construction activities, adherence with County LUO standards and State Health and Safety Code procedures would reduce potential impacts to less than significant; therefore, potential impacts to cultural resources would be less than significant and no mitigation measures are necessary.

Mitigation

None necessary.

VI. ENERGY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		☐	☒	☐
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?		☐	☒	☐

Setting

Local Utilities

The Pacific Gas & Electric Company (PG&E) is the primary electricity provider for urban and rural communities within San Luis Obispo County. Approximately 39% of electricity provided by PG&E is sourced from renewable resources and an additional 47% is sourced from non-renewable GHG-free resources (PG&E 2019).

PG&E offers two programs through which consumers may purchase electricity from renewable sources: the Solar Choice program and the Regional Renewable Choice program. Under the Solar Choice program, a customer remains on their existing electric rate plan and pays a modest additional fee on a per kilowatt-hour (kWh) basis for clean solar power. The fee depends on the type of service, rate plan, and enrollment level. Customers may choose to have 50% or 100% of their monthly electricity usage to be generated via solar projects. The Regional Renewable Choice program enables customers to subscribe to renewable energy from a specific community-based project within PG&E's service territory. The Regional Renewable Choice program allows a customer to purchase between 25% and 100% of their annual usage from renewable sources.

The Southern California Gas Company (SoCalGas) is the primary provider of natural gas for urban and rural communities within San Luis Obispo County. SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (Sempra 2019).

Local Energy Plans and Policies

The COSE establishes goals and policies that aim to reduce vehicle miles traveled (VMT), conserve water, increase energy efficiency and the use of renewable energy, and reduce GHG emissions. This element provides the basis and direction for the development of the County's EnergyWise Plan (EWP), which outlines in greater detail the County's strategy to reduce government and community-wide GHG emissions through a number of goals, measures, and actions, including energy efficiency and development and use of renewable energy resources.

State Building Code Requirements

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation

of a building or other improvement to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent version of which are referred to as the *2019 Building Energy Efficiency Standards*. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. While the CBC has strict energy and green-building standards, U-occupancy structures (such as greenhouses used for cultivation activities) are typically not regulated by these standards.

Vehicle Fuel Economy Standards

In October 2012, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHSTA), on behalf of the Department of Transportation, issued final rules to further reduce GHG emissions and improve corporate average fuel economy (CAFE) standards for light duty vehicles for model years 2017 and beyond. NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon (mpg) limiting vehicle emissions to 163 grams of carbon dioxide (CO_2) per mile for the fleet of cars and light-duty trucks by the model year 2025.

In January 2017, EPA Administrator Gina McCarthy signed a Final Determination to maintain the current GHG emissions standards for the model year 2022-2025 vehicles. However, on March 15, 2017, EPA Administrator Scott Pruitt and Department of Transportation Secretary Elaine Chao announced that EPA intends to reconsider the Final Determination. On April 2, 2018, EPA Administrator Scott Pruitt officially withdrew the January 2017 Final Determination, citing information that suggests that these current standards may be too stringent due to changes in key assumptions since the January 2017 Determination. According to the EPA, these key assumptions include gasoline prices and overly optimistic consumer acceptance of advanced technology vehicles. The April 2nd notice is not EPA's final agency action, and the EPA intends to initiate rulemaking to adopt new standards. Until that rulemaking has been completed, the current standards remain in effect. (EPA 2017, EPA 2018).

As part California's overall approach to reducing pollution from all vehicles, the California Air Resources Board (CARB) has established standards for clean gasoline and diesel fuels and fuel economies of new vehicles. CARB has also put in place innovative programs to drive the development of low-carbon, renewable, and alternative fuels such as their Low Carbon Fuel Standard (LCFS) Program pursuant to California Assembly Bill (AB) 32 and the Governor's Executive Order S-01-07.

In January 2012, CARB approved the Advanced Clean Cars Program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires a battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2016).

All self-propelled off-road diesel vehicles 25 horsepower (hp) or greater used in California and most two-engine vehicles (except on-road two-engine sweepers) are subject to the CARB's Regulation for In-Use Off-Road Diesel Fueled Fleets (Off-Road regulation). This includes vehicles that are rented or leased (rental or leased fleets). The overall purpose of the Off-Road regulation is to reduce emissions of oxides of nitrogen (NO_x) and particulate matter (PM) from off-road diesel vehicles operating within California through the implementation of standards including, but not limited to, limits on idling, reporting and labeling of off-road vehicles, limitations on use of old engines, and performance requirements.

Discussion

(a) *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

(b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Construction Activities

During the construction and implementation, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the county. Based on the size and scope of proposed earthwork and building construction, the project would have the potential to result in adverse environmental impacts through its use of diesel fuel for construction equipment. Mitigation measures AQ-1 and AQ-2 have been identified to reduce potentially significant air quality impacts associated with use of diesel fuel equipment and would require the project contractor to avoid wasteful, inefficient, or unnecessary consumption of energy resources. Upon implementation of these measures, potentially significant environmental impacts associated with consumption of energy resources during construction would be reduced and project construction activities would not result in a conflict with a state or local plan for renewable energy or energy efficiency. Therefore, project construction impacts associated with energy use would be *less than significant with mitigation.*

Project Operations

Electricity and Natural Gas Use. Natural gas use is typically associated with cooking appliances and space heating. The project's operational electricity needs would be met by a connection to PG&E infrastructure augmented by solar photovoltaic panels on the roof the storage buildings.

The CBC 2019 Building Energy Efficiency Standards include mandatory energy efficiency standards. The storage buildings and caretaker residence would be subject to the CBC 2019 Building Energy Efficiency Standards and would rely on power generated by PG&E. Compliance with current building codes will ensure this portion of the project would not be wasteful, inefficient, or unnecessary.

Energy inefficiency contributes to higher GHG emissions and would conflict with state and local plans for energy efficiency, including the policies of the COSE, the EWP goals, and the 2001 SLOAPCD CAP (additional background information on GHG Emissions is provided in Section VIII). The California Energy Emissions Model (CalEEMod) was utilized to determine the approximate GHG emissions from a standard mixed-light cultivation operation based on square footage of the proposed use in order to estimate the project's projected annual carbon dioxide equivalent emissions in metric tons ($MTCO_2e$; Table 10).

Table 10 -- Projected Project Operational GHG Emissions

Project Component	Size (sf)	Estimated Projected Annual CO_2 Emissions (MT/year)
Vehicle Storage	53,000 sq.ft.	236
Caretaker Residence	1,200 sq.ft.	11.8
Total:		247.8

[1] CalEEMOD 2016.

Based on the CalEEMod emissions rate, the proposed project would result in approximately 248 $MTCO_2e$ per year, which is below the SLOAPCD's Bright Line Threshold of 1,150 $MTCO_2e$.

The project's energy use and use of energy resources would contribute cumulatively to the use of energy resources within the vicinity. As proposed, the project would not result in a substantial energy demand in comparison to standard commercial facilities of the same square footage. Therefore, the project's individual impacts associated with energy use would be reduced to less than significant and would not be cumulatively considerable.

Fuel Use. Ongoing operation of the project would result in fuel use associated with employee motor vehicle trips and deliveries. The project would employ 1 employee who will reside on-site. All vehicles used by employees during operation would be subject to applicable state and federal fuel economy standards and State-mandated smog inspections.

For purposes of determining whether fuel use would be wasteful and inefficient and cumulatively considerable, project-related fuel use will be compared with the total fuel use from motor vehicles in San Luis Obispo County.

Table 11 provides a summary of total sales of gasoline and diesel fuel in San Luis Obispo County in 2018.

Table 11 -- State and County Fuel Consumption in 2018

Fuel	Statewide	San Luis Obispo County
Gasoline	13,475 million gallons	150 million gallons (or, about 410,958 gallons per day)
Diesel	1,602 million gallons	22 million gallons

Source: California Energy Commission

Assumptions:

- Daily vehicle miles travelled in San Luis Obispo County in 2020 (estimate from 2014 Regional Transportation Plan): 7,998,615.
- 172 million gallons of fuel consumed per year / 365 days = 471,232 gallons of fuel use per day
- 471,232 gallons of gasoline and diesel fuel consumed per day / 7,998,615 miles travelled per day = 0.058 gallons of fuel consumed per day per mile travelled
- Average Daily Trips (ADT) for Project x 14.7 miles = Daily Vehicle Miles Travelled (VMT)

- Daily VMT x gallons per mile travelled = Daily gallons of fuel use
- Three worker trips and 1 delivery trip per day for construction activities for 10 working days
- 12 Average Daily Trips for operations for 365 days

Construction Fuel Use

4 ADT x 14.7 miles = 58.8 VMT per day

58.8 x 10 days = 588.8 total VMT

588.8 x 0.058 gallons consumed per mile travelled = 34.1 gallons

Operational Fuel Use

12 ADT x 14.7 miles = 176.4 VMT per day

176.4 x 365 days = 64,387 total VMT per year

64,387 x 0.058 gallons consumed per mile travelled = 3,734 gallons per year

Total fuel use associated with construction and operation of the project would be 0.8% of the total daily fuel consumed in the County in 2018. Accordingly, fuel consumption associated with the project would not be wasteful, inefficient or unnecessary.

Therefore, potential impacts associated with potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and potential conflict with state or local plans regarding renewable energy or energy efficiency would be *less than significant with mitigation incorporated.*

Conclusion

The project would result in a potentially significant energy demand and inefficient energy use during long-term operations, which could lead to an increase in GHG emissions and result in potentially significant environmental impacts. Inefficient energy use would potentially conflict with state or local renewable energy or energy efficiency plans. Potential impacts related to energy would be less than significant.

Mitigation

None necessary.

VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	(ii) Strong seismic ground shaking?	☐	☐	☒	☐
	(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	(iv) Landslides?	☐	☐	☒	☐
(b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Setting

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) is a California state law that was developed to regulate development near active faults and mitigate the surface fault rupture potential and other hazards. The Alquist-Priolo Act identifies active earthquake fault zones and restricts the construction of habitable structures over known active or potentially active faults. San Luis Obispo County is located in a geologically complex and seismically active region. The Safety Element of the County of San Luis Obispo General Plan identifies three active faults that traverse through the county and are currently zoned under the Alquist-Priolo Act: the San Andreas, the Hosgri-San Simeon, and the Los Osos.

The County Safety Element also identifies 17 other faults that are considered potentially active or have uncertain fault activity in the County. The Safety Element establishes policies that require new development to be located away from active and potentially active faults. The element also requires that the County enforce applicable building codes relating to seismic design of structures and require design professionals to evaluate the potential for liquefaction or seismic settlement to impact structures in accordance with the Uniform Building Code. The nearest potentially capable fault line is located approximately 3 miles to the east of the project site based on the County Land Use View mapping tool.

The County LUO identifies a Geologic Study Area (GSA) combining designation for areas where geologic and soil conditions could present new developments and/or their occupants with potential hazards to life and property. The project site is not located within the LUO Geologic Study Area (GSA) combining designation. Based on the Safety Element, the project site is located in an area with high landslide risk potential and low liquefaction potential.

The San Luis Obispo County Mineral Designation Maps indicate the site is not located in a Mining Disclosure Zone or Energy/Extractive Area. Therefore, the project would not result in the preclusion of mineral resource availability.

DRAINAGE – The area of disturbance is not located within a 100-year flood hazard area. Drainage, sedimentation and erosion control plans are required for all construction and grading projects (LUO Sec. 22.52.100 and 22.52.110) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project includes a preliminary grading and drainage plan (Figure 4) which shows runoff from the buildings will be collected and conveyed to two retention basins where the runoff water will percolate into the ground.

SEDIMENTATION AND EROSION – Soil type, amount of disturbance and slopes are key aspects to analyzing potential sedimentation and erosion issues. When highly erosive conditions exist, a sedimentation and erosion control plan is required (LUO Section 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Projects involving more than one acre of disturbance are subject to the preparation of a Storm Water Pollution

Prevention Plan (SWPPP), which focuses on controlling storm water runoff. The Regional Water Quality Control Board is the local agency who manages compliance with this program.

According to the engineering geology report prepared for the project site (GeoSolutions, 2019) the project site is the site is located within the Atascadero Formation and is underlain by Cretaceous and Tertiary age Unnamed Formation (Tku) and Dibblee, 2007 mapped the Site as underlain by Holocene age Alluvial Deposits (Qa) and Cretaceous age Atascadero Formation (Kas) units. These formations are not known to support fossil formations (County of Monterey 2014, SWCA Environmental Consultants 2019).

Discussion

(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(a-i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The project site is not located within an Alquist-Priolo Fault Hazard Zone, and the nearest potentially capable fault line is located approximately 5 miles to the east of the project site based on the County Land Use View mapping tool. All proposed structures would follow the regulations set forth in the CBC and thereby would be compliant with applicable seismic standards. Therefore, potential impacts related to the rupture of a known earthquake fault would be *less than significant*.

(a-ii) Strong seismic ground shaking?

Groundshaking refers to the motion that occurs in response to local and regional earthquakes. Seismic groundshaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition. The project would be required to comply with the CBC and other applicable standards to ensure the effects of a potential seismic event would be minimized through compliance with current engineering practices and techniques. The project does not include unique components that would be particularly sensitive to seismic ground shaking or result in an increased risk of injury or damage as a result of ground shaking. Implementation of the project would not expose people or structures to significant increased risks associated with seismic ground shaking; therefore, impacts would be *less than significant.*

(a-iii) Seismic-related ground failure, including liquefaction?

Based on the Safety Element Liquefaction Hazards Map, the project site is located in an area with low potential for liquefaction. In addition, the project would be required to comply with CBC seismic requirements to address the site's potential for seismic-related ground failure including liquefaction; therefore, the potential impacts would be *less than significant.*

(a-iv) Landslides?

The project site has moderately to steeply sloping topography and, based on the Safety Element Landslide Hazards Map, proposed components are located in an area with high potential for landslide risk. According to the engineering geology study prepared for the project site, Burch and Durham, 1970 and Dibblee, 2007 did not map landslides in the vicinity of the property. During site mapping and review of aerial photography, landslides were not observed at the Site. There appears to be a low potential for landslide to affect the proposed development.

The project includes a preliminary grading plan that has been informed by a project-specific engineering geology evaluation and soils engineering evaluation (GeoSolutions, September 30, 2019, GeoSolutions September 27, 2019, respectively). The project will be conditioned to comply with the recommendations of these geotechnical evaluations as well as CBC standards designed to significantly reduce potential risks associated with unstable earth conditions. Therefore, impacts related to on- or off-site landslides would be *less than significant.*

Therefore, the project would not result in significant adverse effects associated with landslides and impacts would be *less than significant.*

(b) Result in substantial soil erosion or the loss of topsoil?

The project would result in approximately 6.6 acres of site disturbance with 14,930 cy of cut and fill. During grading activities, there would be a potential for erosion to occur. A preliminary grading, sedimentation and erosion control plan has been prepared for the project (Figure 4) which shows runoff will be collected by surface swales and conveyed to a point of disposal offsite in the street right-of-way. Runoff will be collected in a manner that minimizes the potential for soil erosion. The final erosion control and sedimentation plan will be subject to the review and approval of the County Building Division in accordance with LUO Section 22.52.120 and will include requirements for specific erosion control materials, setbacks from creeks, and siltation. In addition, the project would be subject to Regional Water Quality Control Board (RWQCB) requirements for preparation of a Storm Water Pollution Prevention Plan (SWPPP) (LUO Section 22.52.130), which may include the preparation of a Storm Water Control Plan to further minimize on-site erosion. Upon implementation of the above control measures, impacts related to soil erosion would be *less than significant*.

(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Based on the Safety Element Landslide Hazards Map, the project site is located in an area with high landslide risk. Based on the Safety Element and U.S. Geological Survey (USGS) data, the project is not located in an area of historical or current land subsidence (USGS 2019) and is located in an area with low potential for liquefaction risk. Due to the distance to the nearest active fault zone and topography of the project site, lateral spreading is not likely to occur on-site.

The project includes a preliminary grading plan that has been informed by a project-specific engineering geology evaluation and soils engineering evaluation (GeoSolutions, September 30, 2019, GeoSolutions September 27, 2019, respectively). The project would be required to comply with the recommendations of these geotechnical evaluations as well as CBC standards designed to significantly reduce potential risks associated with unstable earth conditions. Therefore, impacts related to on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be *less than significant.*

(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Project soils are discussed in Section III. Agricultural Resources. In addition, a soils engineering report was prepared for the project site (GeoSolutions, 2019). According to that study, the potential for expansive soil at the project site is low based on laboratory testing. All new construction will be required to comply with applicable CBC standards designed to reduce potential risks associated with

expansive soils. Therefore, potential impacts associated with expansive soil would be *less than significant.*

(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The project site is within the service area of the Heritage Ranch Community Services District wastewater collection and treatment system. According to the 2016-2018 Resource Management System Resource Summary Report, the treatment plant has a design flow of 0.4 MGD; current (2018) average daily flows are 0.139 MGD, or 35% of design capacity. Because of more stringent effluent regulations and future population growth, the CSD is investigating the need for improvements to the wastewater treatment system. The first step will involve an analysis of the current treatment plant and recommendations on what upgrades should be made to comply with future discharge regulations and to insure adequate capacity.

Based on the projected growth in population within the CSD service area, the plant is expected to operate below capacity for the next four years or more. the project would not adversely affect wastewater systems, change the quality of surface or groundwater, or violate waste discharge requirements.

Therefore, potential impacts associated with having soils incapable of adequately supporting the use of septic tanks would be *less than significant.*

(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project site does not contain any unique rock outcroppings or other unique geologic features. According to the engineering geology report prepared for the project site (GeoSolutions, 2019) the project site is the site is located within Atascadero Formation and is underlain by Cretaceous and Tertiary age Unnamed Formation (Tku) and Dibblee, 2007 mapped the Site as underlain by Holocene age Alluvial Deposits (Qa) and Cretaceous age Atascadero Formation (Kas) units. These formations are not known to support fossil formations (County of Monterey 2014, SWCA Environmental Consultants 2019).

Potential impacts to paleontological resources would be *less than significant.*

Conclusion

Potential impacts to paleontological resources would be less than significant.

Mitigation

None necessary.

VIII. GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Setting

GHGs are any gases that absorb infrared radiation in the atmosphere, and are different from the criteria pollutants discussed in Section III, Air Quality, above. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement).

CO_2 is the most abundant GHG and is estimated to represent approximately 80–90% of the principal GHGs that are currently affecting the earth's climate. According to the CARB, transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

In March 2012, the SLOAPCD approved thresholds for GHG emission impacts, and these thresholds have been incorporated into the CEQA Air Quality Handbook. The Bright-Line Threshold of 1,150 $MTCO_2e$/yr is the most applicable GHG threshold for most projects. Table 1-1 in the SLOAPCD CEQA Air Quality Handbook provides a list of general land uses and the estimated sizes or capacity of those uses expected to exceed the GHG Bight Line Threshold of 1,150 $MTCO_2$/yr. Projects that exceed the criteria or are within 10% of exceeding the criteria presented in Table 1-1 are required to conduct a more detailed analysis of air quality impacts.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

In October 2008, the CARB published its *Climate Change Proposed Scoping Plan*, which is the state's plan to achieve GHG reductions in California required by Assembly Bill (AB) 32. The Scoping Plan included CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations were associated with improving emissions standards for light-duty vehicles, implementing the Low Carbon Fuel Standard program, implementation of energy efficiency measures in buildings and appliances, the widespread development of combined heat and power systems, and developing a renewable portfolio standard for electricity production.

Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extend the state's GHG reduction goals and require CARB to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050. The initial Scoping Plan was first approved by CARB on December 11, 2008, and is updated every 5 years. The first update of the Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) toward reaching the 2050 goals. The most recent update released by CARB is the 2017 Climate Change Scoping Plan, which was released in November 2017. The 2017 Climate Change Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05.

Discussion

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As discussed in Section VI, Energy, the project would not result in inefficient or wasteful energy use that would contribute to higher GHG emissions and would be consistent with state and local plans for the reduction of GHG emissions, including the policies of the COSE, the EWP goals, and the 2001 SLOAPCD CAP. As shown in Table 10 (see Section VI, Energy), the project, as proposed, would not exceed the SLOAPCD Bright-Line Threshold of 1,150 MT CO_2e/year. Therefore, potential impacts associated with GHG emissions and applicable plans and policies adopted for the purpose of reducing GHG emissions would be *less than significant*.

Conclusion

The project would not result in potentially significant GHG emissions during long-term operations and would be consistent with plans adopted to reduce GHG emissions. Potential impacts related to GHG emissions would be less than significant.

Mitigation

None necessary.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Initial Study – Environmental Checklist

Setting

The Hazardous Waste and Substances Site List (Cortese List), which is a list of hazardous materials sites compiled pursuant to California Government Code (CGC) Section 65962.5, is a planning document used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. The project would not be located in an area of known hazardous material contamination and is not on a site listed on the Cortese List (State Water Resources Control Board [SWRCB] 2015; California Department of Toxic Substance Control [DTSC] 2019).

The County has adopted general emergency plans for multiple potential natural disasters, including the Local Hazard Mitigation Plan, County Emergency Operations Plan, Earthquake Plan, Dam and Levee Failure Plan, Hazardous Materials Response Plan, County Recovery Plan, and the Tsunami Response Plan.

The California Health and Safety Code provides regulations pertaining to the abatement of fire-related hazards and requires that local jurisdictions enforce the CBC, which provides standards for fire resistive building and roofing materials, and other fire-related construction methods. The Safety Element of the County of San Luis Obispo General Plan provides a Fire Hazard Zones Map that indicates unincorporated areas in the county within moderate, high, and very high fire hazard severity zones. The project would be located within the State Responsibility Area in a very high fire hazard severity zone. Based on CAL FIRE's referral response letter, it would take approximately 0-5 minutes to respond to a call regarding fire or life safety. For more information about fire-related hazards and risk assessment, see Section XX, Wildfire.

The project would be not located within an Airport Review Area and there are no active public or private landing strips within the immediate project vicinity.

Discussion

(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities may involve the use of oils, fuels, and solvents. In the event of a leak or spill, persons, soil, and vegetation down-slope from the site may be affected. The use, storage, and transport of hazardous materials is regulated by DTSC (22 Cal. Code of Regulations Section 66001, et seq.). The use of hazardous materials on the project site for construction and vehicle maintenance is required to be in compliance with local, state, and federal regulations. In addition, compliance with best management practices (BMPs) for the use and storage of hazardous materials would also address impacts. These BMPs may include, but are not limited to, the following:

- Determining whether a product constitutes a hazardous material in accordance with federal and state regulations;
- Properly characterizing the physical properties, reactivity, fire and explosion hazards of the various materials;
- Using storage containers that are appropriate for the quantity and characteristics of the materials;
- Properly labeling of containers and maintaining a complete and up to date inventory;
- Ongoing inspection and maintenance of containers in good condition;
- Proper storage of incompatible, ignitable and/or reactive wastes;

Project operations would involve the intermittent use of small amounts of hazardous materials such as oils, solvents and gasoline that are not expected to be acutely hazardous.

The project will be conditioned to comply with all applicable CAL FIRE requirements as detailed in the referral response correspondence of April 9, 2020, including, but not limited to the following:

- Compliance with all applicable standards, regulations, codes and ordinances at time of Building Permit issuance (2019 CA Fire Code, CA State Title 14, San Luis Obispo County Title 16).
- Occupancy will not be granted until all fire department fire and life safety items have been installed, tested and finaled.
- A registered Fire Protection Engineer is required to provide a written technical analysis of the fire protection requirements.
- Projects shall have an approved water supply for fire protection be made available as soon as combustible material arrives on the site. All underground fire lines, hydrants, pump and tank plans are required to be a separate submittal from the building or civil plans. Projects with a municipal water distribution will required a will serve letter.
- Submittals required for Underground Fire Lines, Fire Pump, Automatic Fire Sprinklers, Fire Alarm Systems, High Piled Storage (any combustible stored over 12 feet in height).
- All buildings, facilities, and developments shall be accessible to fire department apparatus by way of approved access roadways and/or driveways. The fire access road shall comply with the requirements of CA Title 14 and San Luis Obispo County Title 16. Turn radius within the facility access will meet county fire standards.
- Access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced to provide all-weather driving capabilities. Provide an engineered analysis of the proposed roadway noting its ability to support apparatus weighing 75,000 lbs. (commercial).
- Provide fire department access roads to within 150 feet of any exterior portion of the buildings as measured by an approved route around the exterior of the building or facility.
- Roadways shall be a minimum of 20 feet in width with a 4-foot shoulder and 15-foot 10. Roadway radius shall not have a radius of less than 50 feet. And additional surface width of 4 feet shall be added to curves of 50-100 feet radius and 2 feet to curves of 100-200 feet radius.
- Gates for driveways and/or roadways shall comply with the CA Fire Safe Regulations.
- Commercial - Water storage (for buildings not served by a public water system) and fire flow calculations shall be provided by a Certified State Licensed Civil Engineer, C-16 licensed contractor, or registered engineer indicating compliance with CFC Appendix B.
- Commercial - Approved hydrants shall be installed based in accordance with requirements in CFC appendix B. Private fire service mains shall be installed, tested and maintained per NFPA 24 2016 edition.
- Commercial - Fire Department Connections (FDC) for automatic sprinkler systems shall be located fully visible and recognizable from the street or fire apparatus access roads. FDC shall be located within 50 feet of an approved fire hydrant.

- Commercial - The minimum main size of all fire hydrants shall be 6 inches in diameter. Piping shall be installed with C-900 class 200 piping or ductile iron or equivalent per NFPA 24, 2016 edition for the installation of Underground Fire Protection Mains.
- An automatic fire sprinkler system shall be installed in accordance with provisions set forth in the California Fire Code as amended by the San Luis Obispo amendments and the applicable National Fire Protection Association Standard. Automatic fire sprinkler systems shall be designed by a fire protection engineer or C-16 licensed contractor.
- All buildings shall comply with California Fire Code, Chapter 10 Means of Egress requirements. Including but not limited to; exit signs, exit doors, exit hardware and exit illumination.
- Provide 100 feet of defensible space around all structures.

In addition, the Check-in/Maintenance building contains the caretaker residence and maintenance area. Accordingly, this mixed-occupancy structure will be required to comply with CBC Chapter 5, Section 508. Compliance with the CBC and the recommendations of CalFIRE will ensure that potential impacts associated with hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials would be *less than significant.*

(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Oils, gasoline, lubricants, fuels, and other potentially hazardous substances would be used and temporarily stored onsite during construction activities and for ongoing vehicle maintenance. A spill or leak of these materials under accident conditions during construction or maintenance activities could create a potentially significant hazard to the surrounding environment and Lake Nacimiento. Mitigation measures HAZ-1 and HAZ-2 have been recommended to reduce potential impacts associated with upset or accident conditions during project construction.

Potential impacts associated with hazards to the public or the environment through reasonably foreseeable upset or accident conditions would be *less than significant with mitigation.*

(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The closest school facility is located approximately 1.2 miles northwest of the project site (Cappy Culver Elementary School). The project site is not located within 0.25 mile of an existing or proposed school; therefore, *no impacts* would occur.

(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Based on the California DTSC's Envirostor and SWRCB's GeoTracker, the proposed project site is not listed on or located in close proximity to a site listed on the Cortese List, which is a list of hazardous materials sites compiled pursuant to CGC Section 65962.5; therefore, *no impacts would occur*.

(e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The nearest airstrip in proximity to the project site is the Paso Robles Airport located approximately 10 miles southeast of the site. The project site is not located within an Airport Review designation or adjacent to a private airstrip. The project site is not located within or adjacent to an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impacts would occur.*

(f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project does not require any road closures and would be required to be designed to accommodate emergency vehicle access. The project would not impair implementation or physically interfere with County hazard mitigation or emergency plans; therefore, impacts would be *less than significant.*

(g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The project is located in a Very High Fire Hazard Severity Zone. The project will be conditioned to implement building and site improvements in accordance with the Fire Code, as detailed in the referral response letter, including, but not limited to implementation of a fire safety plan. Therefore, potential impacts associated with exposure of people or structures to significant risk involving wildland fires would be *less than significant.*

Conclusion

The project includes the use of potentially hazardous materials during construction and operation. Mitigation measures have been identified below to reduce potential impacts associated with routine transport, use, and disposal of these materials, as well as potential hazards associated with upset and accident conditions and wildland fire risk. Upon implementation of measures HAZ-1 and HAZ-2, potential impacts associated with hazards and hazardous materials would be *less than significant with mitigation.*

Mitigation

HAZ-1 **Equipment Maintenance and Refueling.** During all construction and vehicle maintenance activities, the cleaning, refueling, and maintenance of equipment and vehicles shall occur only within designated areas. These areas shall conform to all Best Management Practices applicable to attaining zero discharge of stormwater runoff. At a minimum, all construction equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

HAZ-2 **Spill Response Protocol.** During all construction and vehicle maintenance activities, all project-related spills of hazardous materials shall be cleaned up immediately. Appropriate spill prevention and cleanup materials shall be onsite at all times during construction and ongoing operations.

X. HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
	(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	(iv) Impede or redirect flood flows?	☐	☐	☐	☒
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

The RWQCB's Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2017) describes how the quality of surface water and groundwater in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Basin Plan outlines the beneficial uses of streams, lakes, and other water bodies for humans and other life. There are 24 categories of beneficial uses, including, but not limited to, municipal water supply, water contact recreation, non-water contact recreation, and cold freshwater habitat. Water quality objectives are then established to protect the beneficial uses of those water resources. The RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose discharges can affect water quality.

The LUO dictates which projects are required to prepare a drainage plan, including any project that would, for example, change the runoff volume or velocity leaving any point of the site, result in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent. Preparation of a drainage plan is not required where grading is exclusively for an exempt agricultural structure, crop production, or grazing. The LUO also dictates that an erosion and sedimentation control plan is required year-round for all construction and grading permit projects and site disturbance activities of one-half acre or more in geologically unstable areas, on slopes steeper than 30 percent, on highly erodible soils, or within 100 feet of any watercourse.

Per the County's Stormwater Program, the County Department of Public Works is responsible for ensuring that new construction sites implement Best Management Practices (BMPs) during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain coverage under the SWRCB's Construction General Permit. The Construction General Permit requires the preparation of a SWPPP to minimize on-site sedimentation and erosion. There are several types of projects that are exempt from preparing a SWPPP, including routine maintenance to existing developments, emergency construction activities, and projects exempted by the SWRCB or RWQCB. Projects that disturb less than 1 acre must implement all required elements within the site's erosion and sediment control plan as required by the LUO.

For planning purposes, the flood event most often used to delineate areas subject to flooding is the 100-year flood. The Safety Element of the County of San Luis Obispo General Plan establishes policies to reduce flood hazards and reduce flood damage, including, but not limited to, prohibition of development in areas of high flood hazard potential, discouragement of single-road access into remote areas that could be closed during floods, and review of plans for construction in low-lying areas.

Discussion

(a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project would require grading and 14,930 cy of cut and fill. A preliminary sedimentation and erosion control plan has been prepared which includes drainage improvements designed to minimize the potential for soil erosion; the final erosion and sedimentation plan will be subject to the review and approval of the County Building Division in accordance with LUO Section 22.52.120. These measures include, but are not limited to, setbacks from water bodies and siltation. In addition, the project is located outside of a stormwater management area (MS4) and proposes a disturbance area greater than 1.0 acre, therefore, the project will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) by a qualified SWPPP developer in order to demonstrate

compliance with the Federal Clean Water Act which prohibits certain discharges of stormwater containing pollutants.

All potentially hazardous materials proposed to be used onsite would be stored, refilled, and dispensed on-site in full compliance with applicable County Department of Environmental Health standards. Based on the proximity to Lake Nacimiento, the project could result in a violation of water quality standards in the event of a spill which in turn could alter surface water quality. Implementation of mitigation measures HAZ-1 and HAZ-2, along with compliance with existing County and state water quality, sedimentation, and erosion control standards, would reduce potential impacts to *less than significant.*

(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

According to the application materials, the project would result in approximately 0.50 acre-feet of water demand per year, including demand associated with landscape irrigation, vehicle washing and the on-site caretaker residence.

The project is not located within a groundwater basin identified by the Department of Water Resources Bulletin 118 and is within the water service area of the Heritage Ranch CSD. A conditional will-serve letter has been issued for the project by the CSD. Therefore, there would be *no impact* to groundwater or groundwater recharge.

(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(c-i) Result in substantial erosion or siltation on- or off-site?

The project would result in approximately 6.6 acres of site disturbance and 14,930 cy of cut and fill. A final sedimentation and erosion control plan must prepared to minimize the potential for soil erosion, which would be subject to the review and approval of the County Building Division in accordance with LUO Section 22.52.120 to minimize potential impacts related to erosion, and includes requirements for specific erosion control materials, setbacks from creeks, and siltation.

The project would be required to comply with all National Pollution Discharge Elimination System (NPDES) requirements and prepare a SWPPP that incorporates BMPs during construction. Water quality protection measures would include protection of stockpiles, protection of slopes, protection of all disturbed areas, protection of access roads, and perimeter containment measures. Therefore, potential impacts associated with erosion and siltation from substantial alteration of the existing on-site drainage pattern would be *less than significant.*

(c-ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The project would result in an increase in impervious surface area on the project property as a result of installation of driveway and parking areas and construction of about 5.5 acres of vehicle storage buildings and associated flatwork.

The project will be subject to post-construction stormwater requirements through preparation and implementation of a SWPPP, which would identify appropriate Best Management Practices to capture and treat runoff before it leaves the site. The preliminary grading, drainage, and erosion control plan prepared for the project also identifies measures such as hydroseeding of all disturbed surfaces and

installation of fiber rolls throughout the site to slow runoff and capture sediment. Based on required compliance with applicable state and County drainage and stormwater control regulations, the project's impacts associated with increased surface runoff resulting in flooding on- or off-site would be *less than significant.*

(c-iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project would be subject to post-construction stormwater requirements through preparation and implementation of a SWPPP, which would identify appropriate Best Management Practices to capture and treat runoff before it leaves the site. Based on required compliance with applicable state and County drainage and stormwater control regulations, the project's impacts associated with increased surface runoff resulting in exceedance of the capacity of existing or planned drainage systems or provide substantial additional sources of polluted runoff would be *less than significant.*

(c-iv) Impede or redirect flood flows?

Based on the County Flood Hazard Map, the project site is not located within a 100-year flood zone. The project would be subject to standard County requirements for drainage, sedimentation, and erosion control for construction and operation. Therefore, *no impacts would occur.*

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Based on the Safety Element Flood Hazard Map, the project site is not located within a 100-year flood zone (County of San Luis Obispo 2013). Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami (CDOC 2019). The project site is located within close proximity to a standing body of water (Lake Nacimiento) but is a minimum 100 feet in elevation above the maximum lake level. Therefore, the potential for damage from a seiche is low. Therefore, the project site has no potential to release pollutants due to project inundation and *no impacts would occur.*

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project is not located within a groundwater basin identified by the Department of Water Resources Bulletin 118 and is within the water service area of the Heritage Ranch CSD. Therefore, there would be no impact relating to implementation of a water quality control plan or sustainable groundwater management plan. Therefore, there would be *no impact*.

Conclusion

Compliance with existing regulations and/or required plans would adequately reduce potential impacts associated with hydrology and water quality to be less than significant.

Mitigation

None necessary.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Physically divide an established community?	☐	☐	☒	☐
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

Setting

The LUO was established to guide and manage the future growth in the county in accordance with the County of San Luis Obispo General Plan; regulate land use in a manner that will encourage and support orderly development and beneficial use of lands; minimize adverse effects on the public resulting from inappropriate creation, location, use, or design of buildings or land uses; and protect and enhance significant natural, historic, archeological, and scenic resources within the county. The LUO is the primary tool used by the County to carry out the goals, objectives, and policies of the General Plan.

The Land Use Element (LUE) of the County of San Luis Obispo General Plan provides policies and standards for the management of growth and development in each unincorporated community and rural areas of the county and serves as a reference point and guide for future land use planning studies throughout the county. The LUE identifies strategic growth principles to define and focus the County's proactive planning approach and balance environmental, economic, and social equity concerns. Each strategic growth principle correlates with a set of policies and implementation strategies that define how land will be used and resources protected. The LUE also defines each of the 14 land use designations and identifies standards for land uses based on the designation they are located within. The project site is within the Recreation land use designation. The project site is currently undeveloped.

The inland LUE also contains the area plans of each of the four inland planning areas: Carrizo, North County, San Luis Obispo, and South County. The area plans establish policies and programs for land use, circulation, public facilities, services, and resources that apply "areawide," in rural areas, and in unincorporated urban areas within each planning area. Part three of the LUE contains each of the 13 inland community and village plans, which contain goals, policies, programs, and related background information for the County's unincorporated inland urban and village areas. The project site is located within the Nacimiento Sub Planning Area of the North County Planning Area. The Heritage Ranch Village Plan and the Lake Nacimiento Resort Specific Plan are also applicable to this project.

Discussion

(a) Physically divide an established community?

The project does not propose project elements or components that would physically divide the site from surrounding areas and uses. The project would be consistent with the general level of

development within the project vicinity and would not create, close, or impede any existing public or private roads, or create any other barriers to movement or accessibility within the community. Therefore, the proposed project would not physically divide an established community and *impacts would be less than significant.*

(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project would be consistent with the property's land use designation and the guidelines and policies for development within the applicable area plan, inland LUO, and the COSE. The project was found to be consistent with standards and policies set forth in the County of San Luis Obispo General Plan, the North County Area Plan, the SLOAPCD Clean Air Plan, and other land use policies for this area. The project would be required to be consistent with standards set forth by County Fire/CAL FIRE and the County Public Works Department.

According to the Public Works Department, portions of the project site appear to be located at or below the 825-foot contour elevation which is a grading/building restriction easement of the Monterey County Water Resources Agency (MCWRA). The project will be conditioned such that building permits will not be issued unless and until evidence is provided to the Department of Planning Building that the MCWRA has approved development within the easement.

The project would be required to implement measures to mitigate potential impacts associated with air quality, biological resources, and hazardous materials; therefore, with mitigation, the project would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating environmental effects and impacts would be *less than significant with mitigation.*

Conclusion

The project would be consistent with local and regional land use designations, plans, and policies and would not divide an established community. Potential impacts related to land use and planning would be *less than significant with mitigation* measures associated with aesthetic resources, air quality, biological resources, and hazardous materials.

Mitigation

Implement mitigation measures, AQ-1, AQ-2, BIO-1 through BIO-22, and HAZ-1 through HAZ-2.

XII. MINERAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Setting

The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that the State Geologist classify land into mineral resource zones (MRZ) according to the known or inferred mineral potential of the land (California PRC Sections 2710–2796).

The three MRZs used in the SMARA classification-designation process in the San Luis Obispo-Santa Barbara Production-Consumption Region are defined below (California Geological Survey [CGS] 2015):

- **MRZ-1:** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Areas containing known or inferred aggregate resources of undetermined significance.

The LUO provides regulations for development in delineated Energy and Extractive Resource Areas (EX) and Extractive Resource Areas (EX1). The EX combining designation is used to identify areas of the county where:

1. Mineral or petroleum extraction occurs or is proposed to occur;
2. The state geologist has designated a mineral resource area of statewide or regional significance pursuant to California PRC Sections 2710 et seq. (SMARA); and
3. Major public utility electric generation facilities exist or are proposed.

The purpose of this combining designation is to protect significant resource extraction and energy production areas identified by the County LUE from encroachment by incompatible land uses that could hinder resource extraction or energy production operations, or land uses that would be adversely affected by extraction or energy production.

Initial Study – Environmental Checklist

Discussion

(a) *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

Based on the California Geological Survey (CGS) Information Warehouse for Mineral Land Classification, the project site is not located within an area that has been evaluated for mineral resources and is not in close proximity to an active mine (CGS 2015). In addition, based on Chapter 6 of the County of San Luis Obispo General Plan Conservation and Open Space Element – Mineral Resources, the project site is not located within an extractive resource area or an energy and extractive resource area. The project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation. There are no known mineral resources in the project area; therefore, there would be *no impact*.

(b) *Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

The project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation. There are no known mineral resources in the project area; therefore, there would be *no impact.*

Conclusion

No impacts to mineral resources would occur and no mitigation measures are necessary.

Mitigation

None necessary.

XIII. NOISE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
(c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

The Noise Element of the County of San Luis Obispo General Plan provides a policy framework for addressing potential noise impacts in the planning process. The purpose of the Noise Element is to minimize future noise conflicts. The Noise Element identifies the major noise sources in the county (highways and freeways, primary arterial roadways and major local streets, railroad operations, aircraft and airport operations, local industrial facilities, and other stationary sources) and includes goals, policies, and implementation programs to reduce future noise impacts. Among the most significant polices of the Noise Element are numerical noise standards that limit noise exposure within noise-sensitive land uses and performance standards for new commercial and industrial uses that might adversely impact noise-sensitive land uses.

Noise sensitive uses that have been identified by the County include the following:

- Residential development, except temporary dwellings
- Schools (preschool to secondary, college and university, and specialized education and training)
- Health care services (e.g., hospitals, clinics, etc.)
- Nursing and personal care
- Churches
- Public assembly and entertainment
- Libraries and museums
- Hotels and motels
- Bed and breakfast facilities

- Outdoor sports and recreation
- Offices

All sound levels referred to in the Noise Element are expressed in A-weighted decibels (dBA). A-weighting de-emphasizes the very low and very high frequencies of sound in a manner similar to the human ear.

The LUO establishes acceptable standards for exterior and interior noise levels and describe how noise shall be measured. Exterior noise level standards are applicable when a land use affected by noise is one of the sensitive uses listed in the Noise Element. Exterior noise levels are measured from the property line of the affected noise-sensitive land use.

Table 12 -- Maximum allowable exterior noise level standards[1]

Sound Levels	Daytime 7 a.m. to 10 p.m.	Nighttime [2]
Hourly Equivalent Sound Level (L_{eq}, dB)	50	45
Maximum level, dB	70	65

[1] When the receiving noise-sensitive land use is outdoor sports and recreation, the noise level standards are increased by 10 db.

[2] Applies only to uses that operate or are occupied during nighttime hours.

The existing ambient noise environment is characterized by marginal traffic on River Road and connecting roadways, as well as agricultural equipment from surrounding properties. The nearest existing noise-sensitive land use is a rural residence located approximately 2,300 feet (0.4 miles) south of the project area.

Discussion

(a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction Impacts. The County LUO noise standards are subject to a range of exceptions, including noise sources associated with construction, provided such activities do not take place before 7 a.m. or after 9 p.m. on weekdays, or before 8 a.m. or after 5 p.m. on Saturday or Sunday. Noise associated with agricultural land uses (as listed in Section 22.06.030), traffic on public roadways, railroad line operations, and aircraft in flight are also exempt.

Project construction would result in a temporary increase in noise levels associated with construction activities, equipment, and vehicle trips. Construction noise would be variable, temporary, and limited in nature and duration. The County LUO requires that construction activities be conducted during daytime hours to be able to utilize County construction noise exception standards and that construction equipment be equipped with appropriate mufflers recommended by the manufacturer. Compliance with these standards would ensure short-term construction noise would be less than significant.

Operational Impacts. The project proposes the use of an HVAC system for the caretaker residence that would be an intermittent source of stationary noise. Noise associated with the use of wall- or roof-mounted HVAC equipment would be expected to generate noise levels of approximately 60 dBA at distance of 5 feet from the source. Noise attenuates (diminishes) at a rate of 6 dB per doubling of distance (OSHA Technical Manual, Section III, Chapter 5). As proposed, the building housing the caretaker unit will be located at least 900 feet from the northern property line, 670 feet from the

western property line, and 2,480 feet from the eastern property line, which would result in no detectable HVAC noise generation at the closest property lines.

Operation of the HVAC system would not exceed the nighttime hourly average standard of 45 dBA. Therefore, operational noise impacts would be *less than significant*.

Based on the limited nature of construction activities, and the consistency of the proposed use with existing and surrounding uses, impacts associated with the generation of a substantial temporary or permanent increase in ambient noise levels would be *less than significant.*

(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The project does not propose substantial grading/earthmoving activities, pile driving, or other high impact activities that would generate substantial groundborne noise or groundborne vibration during construction. Construction equipment has the potential to generate minor groundborne noise and/or vibration, but these activities would be limited in duration and are not likely to be perceptible from adjacent areas. The project does not propose a use that would generate long-term operational groundborne noise or vibration. Therefore, impacts related to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be *less than significant.*

(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The nearest airstrip in proximity to the project site is Paso Robles Airport located approximately 10 miles to the southeast. The project site is not located within an Airport Review designation or adjacent to a private airstrip. The project site is not located within or adjacent to an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impact would occur*.

Conclusion

Short-term construction activities would be limited in nature and duration and conducted during daytime periods per LUO standards. No noise impacts would occur, and no mitigation measures are necessary.

Mitigation

None necessary.

XIV. POPULATION AND HOUSING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Setting

The Housing Element of the County of San Luis Obispo General Plan recognizes the difficulty for residents to find suitable and affordable housing within San Luis Obispo County. The Housing Element includes an analysis of vacant and underutilized land located in urban areas that is suitable for residential development and considers zoning provisions and development standards to encourage development of these areas. Consistent with state housing element laws, these areas are categorized into potential sites for very low- and low-income households, moderate-income households, and above moderate-income households.

The County's Inclusionary Housing Ordinance requires the provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions. In its efforts to provide for affordable housing, the County currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provide limited financing to projects relating to affordable housing throughout the county.

The project site is currently undeveloped.

Discussion

(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project proposes a vehicle storage facility and caretaker residence within a rural area and would employ 1 full-time employee who will reside on site in a caretaker unit. Workers would likely be sourced from the local labor pool and would not require new or additional housing as a result of the proposed project. The project would not generate a substantial number of new employment opportunities that would encourage population growth in the area. The project does not include the extension or establishment of roads, utilities, or other infrastructure that would induce development and population growth in new areas. In addition, the project would be subject to inclusionary housing fees to offset any potential increased need for housing in the area. Therefore, the project would not directly or indirectly induce substantial growth and impacts would be *less than significant.*

(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project would not displace existing housing or necessitate the construction of replacement housing elsewhere; therefore, impacts would be *less than significant.*

Conclusion

No impacts to population and housing would occur and no mitigation measures are necessary.

Mitigation

None necessary.

XV. PUBLIC SERVICES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	Fire protection?	☐	☐	☒	☐
	Police protection?	☐	☐	☒	☐
	Schools?	☐	☐	☒	☐
	Parks?	☐	☐	☒	☐
	Other public facilities?	☐	☐	☒	☐

Setting

Fire protection services in unincorporated San Luis Obispo County are provided by CAL FIRE, which has been under contract with the County to provide full-service fire protection since 1930. Approximately 180 full-time state employees operate the County Fire Department, supplemented by as many as 100 state seasonal fire fighters, 300 County paid-call and reserve fire fighters, and 120 state inmate fire fighters. CAL FIRE responds to emergencies and other requests for assistance, plans for and takes action to prevent emergencies and reduce their impact, coordinates regional emergency response efforts, and provides public education and training in local communities. CAL FIRE has 24 fire stations located throughout the county, and the project would be served by CAL FIRE station #33, located approximately 2 miles south of the project site in the community of Heritage Ranch. Based on the referral response letter received from CAL FIRE regarding the proposed project, emergency personnel would be able to reach the site within 0 - 5 minutes of receiving a call.

Police protection and emergency services in the unincorporated portions of the county are provided by the San Luis Obispo County Sheriff's Office. The Sheriff's Office Patrol Division responds to calls for service, conducts proactive law enforcement activities, and performs initial investigations of crimes. Patrol personnel are deployed from three stations throughout the county, the Coast Station in Los Osos, the North Station in Templeton, and the South Station in Oceano. The project would be served by the County Sheriff's Office, and

the nearest sheriff station is located approximately 15 miles south of the project site, in the community of Templeton

San Luis Obispo County has a total of 12 school districts that currently enroll approximately 34,000 students in over 75 schools. The project site is located within the San Miguel Joint Union School District and the Paso Robles Joint Unified School District.

Within the County's unincorporated areas, there are currently 23 parks, three golf courses, four trails/staging areas, and eight Special Areas that include natural areas, coastal access, and historic facilities currently operated and maintained by the County.

Public facilities fees, Quimby fees, and developer conditions are several ways the County currently funds public services. A public facility fee program (i.e., development impact fee program) has been adopted to address impacts related to public facilities (county) and schools (CGC Section 65995 et seq.). The fee amounts are assessed annually by the County based on the type of proposed development and the development's proportional impact and are collected at the time of building permit issuance. Public facility fees are used as needed to finance the construction of and/or improvements to public facilities required to the serve new development, including fire protection, law enforcement, schools, parks, and roads.

Discussion

(a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

Fire protection?

The project would be designed to comply with all fire safety rules and regulations, including the California Fire Code and California PRC, fire sprinklers in new buildings, and compliance with other provisions of the Fire Code. The County Fire Department/CAL FIRE has provided a referral response letter for the project that details required items to be completed prior to final inspection/operation of the project. The project would not create a significant new demand for fire services. In addition, the project would be subject to public facility fees to offset the increased cumulative demand on fire protection services. Therefore, impacts would be *less than significant*. Additional information regarding wildfire hazard impacts is discussed in Section XX, Wildfire. Additional information regarding fire related hazard impacts is discussed in Section IX, Hazards and Hazardous Materials.

Police protection?

The project would be subject to public facility fees to offset the project's cumulative contribution to demand on law enforcement services. Therefore, impacts related to police services would be *less than significant.*

Schools?

As discussed in Section XIV, Population/Housing, the project would not induce population growth and would not result in the need for additional school services or facilities. However, the project would be subject to school impact fees, pursuant to California Education Code Section 17620, to help fund construction or reconstruction of school facilities. Therefore, impacts would be *less than significant*.

Parks?

As discussed in Section XIV, Population and Housing, the project would not induce a substantial increase in population growth and would not result in the need for additional parks or recreational services or facilities to serve new populations; therefore, potential impacts would be *less than significant.*

Other public facilities?

As discussed above, the proposed project would be subject to applicable fees to offset negligible increased demands on public facilities; therefore, impacts related to other public facilities would be *less than significant.*

Conclusion

The project does not propose development that would substantially increase demands on public services and would not induce population growth that would substantially increase demands on public services. The project would be subject to payment of development impact fees to reduce the project's negligible contribution to increased demands on public services and facilities. Therefore, potential impacts related to public services would be less than significant and no mitigation measures are necessary.

Mitigation

None necessary.

XVI. RECREATION

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Setting

The Parks and Recreation Element (Recreation Element) of the County of San Luis Obispo General Plan establishes goals, policies, and implementation measures for the management, renovation, and expansion of existing parks and recreation facilities and the development of new parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county.

Public facilities fees, Quimby fees, and developer conditions are several ways the County currently funds public parks and recreational facilities. Public facility fees are collected upon construction of new residential units and currently provide funding for new community-serving recreation facilities. Quimby Fees are collected when new residential lots are created and can be used to expand, acquire, rehabilitate, or develop community-serving parks. Finally, a discretionary permit issued by the County may condition a project to provide land, amenities, or facilities consistent with the Recreation Element.

The County Bikeways Plan identifies and prioritizes bikeway facilities throughout the unincorporated area of the county, including bikeways, parking, connections with public transportation, educational programs, and funding. The Bikeways Plan is updated every 5 years and was last updated in 2016. The plan identifies goals, policies, and procedures geared towards realizing significant bicycle use as a key component of the transportation options for San Luis Obispo County residents. The plan also includes descriptions of bikeway design and improvement standards, an inventory of the current bicycle circulation network, and a list of current and future bikeway projects within the county.

Discussion

(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The project proposes a vehicle storage facility within a semi-urban area and would employ one full-time employee. Workers would likely be sourced from the local labor pool and would not result in increased demand on existing or planned recreational facilities in the county. The project is not proposed in a location that would affect any existing trail, park, recreational facility, coastal access, and/or natural area. The project would not result in a substantial growth within the area and would

not substantially increase demand on any proximate existing neighborhood or regional park or other recreational facilities. Payment of standard development impact fees would ensure any incremental increase in use of existing parks and recreational facilities would be reduced to *less than significant.*

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project does not include the construction of new recreational facilities and would not result in a substantial increase in demand or use of parks and recreational facilities. Implementation of the project would not require the construction or expansion of recreational facilities; therefore, impacts would be *less than significant.*

Conclusion

The project would not result in the significant increase in use, construction, or expansion of parks or recreational facilities. Therefore, potential impacts related to recreation would be less than significant and no mitigation measures are necessary.

Mitigation

None necessary.

XVII. TRANSPORTATION

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
(b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
(c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
(d)	Result in inadequate emergency access?	☐	☐	☒	☐

Setting

The County Department of Public Works maintains updated traffic count data for all County-maintained roadways. In addition, Traffic Circulation Studies have been conducted within several community areas using traffic models to reasonably simulate current traffic flow patterns and forecast future travel demands and traffic flow patterns. These community Traffic Circulation Studies include the South County Circulation Study, Los Osos Circulation Study, Templeton Circulation Study, San Miguel Circulation Study, Avila Circulation Study, and North Coast Circulation Study. The California Department of Transportation (Caltrans) maintains annual traffic data on state highways and interchanges within the county.

The County has established Level of Service (LOS) "C" or better for rural roadways. The project site is currently undeveloped and is located in a semi-rural area accessed by Heritage Road in the community of Heritage Ranch. Heritage Road is a privately-maintained, two-lane collector serving the community of Heritage Ranch; the roadway provides access to the City of Paso Robles through a connection with Lake Nacimiento to the south. A project referral package was sent to the County Public Works Department and no traffic-related concerns were identified.

In 2013 SB 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis under

CEQA (as detailed in Section 15064.3 [b]). Beginning July 1, 2020, the newly adopted VMT criteria for determining significance of transportation impacts must be implemented statewide.

The County's Framework for Planning (Inland), includes the Land Use and Circulation Elements of the County of San Luis Obispo General Plan. The Framework establishes goals and strategies to meet pedestrian circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum access and connectivity between land use designations. Due to the remote location of the project site, there are no pedestrian, bicycle, or public transit facilities serving of the project site.

The project site fronts Heritage Road where it forms the northern terminus of Heritage Loop Road from the south. Traffic counts taken on Heritage Loop Road in 2018 revealed an afternoon peak hour volume of 192 in the vicinity of the project site and 1,687 average daily trips.

Discussion

(a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Construction Impacts. Construction related traffic will increase during the morning and afternoon peak hours on Heritage Road. Based on the project description, it is expected that as many as 3 workers may be arriving and leaving the project site on a typical construction work day. Assuming 3 PM peak hour trips on Heritage Road, traffic will increase by less than 1% per day for a construction timeframe of one to two months. The temporary increase in traffic will not reduce the level of service which will remain within the standard set by the General Plan Circulation Element.

Operational Impacts

The project was referred to the Public Works Department. Their response letter of June 26, 2019 did not identify any traffic-related issues. As discussed in the setting, the project is expected to generate up to 12 average daily trips. The additional 12 daily trips on Heritage Road will increase the traffic volume by less than 1% per day. The increase in traffic will not reduce the level of service which will remain within the standard set by the General Plan Circulation Element.

Based on the relatively low trip generation, the project would not noticeably impact traffic operation, would not reduce levels of service on nearby roads, conflict with adopted policies, plans or programs for transportation, and would not cause congestion on the local circulatory network. Since the project would not likely generate foot or bicycle traffic, or generate public transit demand, and since no public transit facilities, pedestrian or bicycle facilities exist in the area, the project would have no impact on levels of service/conditions for these facilities.

Marginal increases in traffic can be accommodated by existing local streets and the project would not result in any long-term changes in traffic or circulation or reduce the Level of Service below LOS "C". The project does not propose uses that would interfere or conflict with applicable policies related to circulation, transit, roadway, bicycle, or pedestrian systems or facilities. The project would be consistent with the County Framework for Planning (Inland) and consistent with the projected level of growth and development identified in the 2019 RTP. Therefore, potential impacts would be less than significant.

No significant traffic impacts were identified, and no mitigation measures above what are already required by existing regulations are necessary.

(b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The County of San Luis Obispo has not yet identified an appropriate model or method to estimate vehicle miles traveled for proposed land use development projects. Section 15064.3, subdivision (b) states that if existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively.

Based on the nature and location of the project, the project would not generate a significant increase in construction-related or operational traffic trips or vehicle miles traveled. The project would not substantially change existing land uses and would not result in the need for additional new or expanded transportation facilities. The project would be subject to standard development impact fees to offset the relative impacts on surrounding roadways. Therefore, potential impacts would be *less than significant*.

(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project would not change roadway design and does not include geometric design features that would create new hazards or an incompatible use. Therefore, impacts would be *less than significant*.

(d) Result in inadequate emergency access?

The project would not result in road closures during short-term construction activities or long-term operations. Individual access to adjacent properties would be maintained during construction activities and throughout the project area. Project implementation would not affect long-term access through the project area and sufficient alternative access exists to accommodate regional trips. Therefore, the project would not adversely affect existing emergency access and impacts would be *less than significant*.

Conclusion

The project would not alter existing transportation facilities or result in the generation of substantial additional trips or vehicle miles traveled. Payment of standard development fees and compliance with existing regulations would ensure potential impacts were reduced to less than significant. Potential impacts related to emergency access would be less than significant.

Mitigation

None necessary.

XVIII. TRIBAL CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
	(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Setting

Approved in 2014, AB 52 added tribal cultural resources to the categories of resources that must be evaluated under CEQA. Tribal cultural resources are defined as either of the following:

1. Sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the CRHR; or
    b. Included in a local register of historical resources as defined in subdivision (k) of California PRC Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth California PRC Section 5024.1(c).

In applying these criteria for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Recognizing that tribes have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe regarding the potential for adverse impacts on tribal cultural resources as a result of a project. Consultation may include discussing the type of environmental review necessary, the presence and/or significance of tribal cultural resources, the level of significance of a project's impacts on the tribal cultural resources, and available project alternatives and mitigation measures recommended by the tribe to avoid or lessen potential impacts on tribal cultural resources.

In accordance with AB 52 Cultural Resources requirements, outreach to four Native American tribes has been conducted: Northern Salinan, Xolon Salinan, tiṭu tiṭu yak tiłhini Northern Chumash, and Northern Chumash Tribal Council.

Discussion

(a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

(a-i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

The County has provided notice of the opportunity to consult with appropriate tribes per the requirements of AB 52. Two responses were received. The Salinan Tribe of Monterey and San Luis Obispo Counties requested that a Phase I cultural resources survey be completed for the project site. As discussed in Section V., Cultural Resources, the Phase I survey completed by Padre Associates in April 2020 and found no cultural or historical resources on the project site. A subsequent correspondence from the Salinan Tribe indicated that they have no further comments or concerns. A second response was received from the Northern Chumash Tribal Council (December 15, 2019) stating that they have no further comments on the project.

As discussed in Section V., Cultural Resources, the project site does not contain any known tribal cultural resources that have been listed or been found eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1. Potential impacts associated with the inadvertent discovery of tribal cultural resources would be subject to LUO 22.10.040 (Archaeological Resources), which requires that in the event resources are encountered during project construction, construction activities shall cease, and the County Planning and Building Department shall be notified of the discovery so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and the disposition of artifacts may be accomplished in accordance with state and federal law. Therefore, impacts related to a substantial adverse change in the significance of tribal cultural resources would be *less than significant.*

(a-ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The project site does not contain any resources determined by the County to be a potentially significant tribal cultural resource. Impacts associated with potential inadvertent discovery would be minimized through compliance with existing standards and regulations (LUO 22.10.040). Therefore, potential impacts would be *less than significant*.

Conclusion

No tribal cultural resources are known or expected to occur within or adjacent to the project site. In the event unanticipated sensitive resources are discovered during project activities, adherence with LUO standards and State Health and Safety Code procedures would reduce potential impacts to less than significant; therefore, potential impacts to tribal cultural resources would be less than significant and no mitigation measures are necessary.

Mitigation

None necessary.

XIX. UTILITIES AND SERVICE SYSTEMS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
(c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

The County Department of Public Works provides water and wastewater services for specific County Service Areas (CSAs) that are managed through issuance of water/wastewater "will serve" letters. The Department of Public Works currently maintains CSAs for the communities of Nipomo, Oak Shores, Cayucos, Avila Beach, Shandon, the San Luis Obispo County Club, and Santa Margarita. Other unincorporated areas in the county rely on on-site wells and individual wastewater systems. The project site is within the water and wastewater service areas of the Heritage Ranch CSD.

Per the County's Stormwater Program, the Department of Public Works is responsible for ensuring that new construction sites implement BMPs during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain coverage under the SWRCB's Construction General Permit. PG&E is the primary electricity provider and both PG&E and

SoCalGas provides natural gas services for urban and rural communities within the county. The project would be served by a community water and wastewater system (Heritage Ranch CSD). The project's energy needs would be provided by PG&E.

There are three landfills in San Luis Obispo County: Cold Canyon Landfill, located near the city of San Luis Obispo; Chicago Grade Landfill, located near the community of Templeton; and Paso Robles Landfill, located east of the city of Paso Robles. The project's solid waste needs would be served by Mid-State Solid Waste and Recycling and the Chicago Grade Landfill.

Discussion

(a) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The project site is located in a semi-urban area and within the service boundaries of the Heritage Ranch Community Services District. The project will not result in a substantial increase in demand on water, wastewater, or stormwater collection, treatment, or disposal facilities and would not require the construction of new or expanded offsite water, wastewater, or stormwater facilities. The project would not result in a substantial increase in energy demand, natural gas, or telecommunications; no new or expanded facilities would be required. No utility relocations are proposed. Therefore, impacts would be *less than significant*.

(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As discussed in Section X, Hydrology and Water Quality, the project would result in approximately 0.50 acre-feet of water demand per year, served by the Heritage Ranch CSD who have issued a Conditional Will Serve letter dated August 15, 2019. According to the 2016-2018 Resource Summary Report, water demand projected over 20 years is not expected to equal or exceed the dependable supply. The 1,100 AFY Nacimiento Reservoir allocation for Heritage Ranch CSD is sufficient to provide water for anticipated buildout demand, but the configuration of the delivery system leaves the Heritage Ranch CSD vulnerable to a termination in water supply in an extreme drought. If the lake's water level drops below the dam outlet (has never occurred but came to within two feet of the lower outlet works in October 1989), then Heritage Ranch CSD could temporarily lose its water supply. As an emergency alternative means of receiving water, a pipeline intertie project connecting Heritage Ranch CSD treatment plant to the Nacimiento Water Project pipeline was completed in 2016.

Heritage Ranch CSD is studying the feasibility of augmenting the District's water resources portfolio by adding recycled water usage for potential customers (MKN & Associates, January 2017). The 2017 study considers several alternatives for recycled water use and concludes that there is sufficient demand for 70 AFY of recycled water serving one potential customer. However, no commitments have been obtained by the potential recycled water customer as of August 2018. However, this represents a potential 70 AFY saving in the future demand for potable water.

The Heritage Ranch CSD is expected to be able to meet it's water demand for the next 20 years. The project is not located within a Bulletin 118 Groundwater Basin. Therefore, impacts related to water supplies would be *less than significant.*

(c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The project site is within the service area of the Heritage Ranch Community Services District wastewater collection and treatment system. According to the 2016-2018 Resource Management System Resource Summary Report, the treatment plant has a design flow of 0.4 MGD; current (2018) average daily flows are 0.139 MGD, or 35% of design capacity. Because of more stringent effluent regulations and future population growth, the CSD is investigating the need for improvements to the wastewater treatment system. The first step will involve an analysis of the current treatment plant and recommendations on what upgrades should be made to comply with future discharge regulations and to insure adequate capacity.

Based on the projected growth in population within the CSD service area, the plant is expected to operate below capacity for the next four years or more. the project would not adversely affect wastewater systems, change the quality of surface or groundwater, or violate waste discharge requirements. Therefore, impacts associated with wastewater collection and treatment capacity are considered *less than significant*.

(d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The nearest landfill to the site is the Chicago Grade Landfill, located approximately 15 miles to the southeast. The landfill has a remaining capacity of approximately four million cubic yards as of 2019. The incremental amount of waste generated by the project that is not recycled/reused would be within the service capacity of the landfill. Construction activities would result in the generation of minimal solid waste materials; no significant long-term increase in solid waste would occur. Local landfills have adequate permit capacity to serve the project and the project does not propose to generate solid waste in excess of State or local standards or otherwise impair the attainment of solid waste reduction goals. Therefore, potential impacts would be *less than significant*.

(e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The project would not result in a substantial increase in waste generation during project construction or operation. Construction waste disposal would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, potential impacts would be *less than significant.*

Conclusion

The project would not result in significant increased demands on wastewater or stormwater infrastructure and facilities. No substantial increase in solid waste generation would occur. The project is not located in a Bulletin 118 Groundwater Basin; there is a no potential for impacts related to groundwater supply. Heritage Ranch CSD has sufficient water and wastewater capacity to serve the project and the community. Therefore, potential impacts to utilities and service systems would be *less than significant.*

Mitigation

None necessary.

XX. WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Setting

In central California, the fire season usually extends from roughly May through October; however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. Fire Hazard Severity Zones (FHSZ) are defined by CALFIRE based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the county have been designated as "Very High," "High," or "Moderate." In San Luis Obispo County, most of the area that has been designated as a "Very High Fire Hazard Severity Zone" is located in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San Luis Obispo County. The project would be located within the State Responsibility Area in a high fire hazard severity zone. The project is located in a "Very High" fire hazard severity zone, and, based on CAL FIRE's referral response letter, it would take approximately 0 - 5 minutes to respond to a call regarding fire or life safety.

The County Emergency Operations Plan (EOP) addresses several overall policy and coordination functions related to emergency management. The EOP includes the following components:

- Identifies the departments and agencies designated to perform response and recovery activities and specifies tasks they must accomplish;
- Outlines the integration of assistance that is available to local jurisdictions during disaster situations that generate emergency response and recovery needs beyond what the local jurisdiction can satisfy;
- Specifies the direction, control, and communications procedures and systems that will be relied upon to alert, notify, recall, and dispatch emergency response personnel; alert the public; protect residents and property; and request aid/support from other jurisdictions and/or the federal government;
- Identifies key continuity of government operations; and
- Describes the overall logistical support process for planned operations.

Topography influences wildland fire to such an extent that slope conditions can often become a critical wildland fire factor. Conditions such as speed and direction of dominant wind patterns, the length and steepness of slopes, direction of exposure, and/or overall ruggedness of terrain influence the potential intensity and behavior of wildland fires and/or the rates at which they may spread (Barros et al. 2013).

The Safety Element of the County of San Luis Obispo General Plan establishes goals, policies, and programs to reduce the threat to life, structures, and the environment caused by fire. Policy S-13 identifies that new development should be carefully located, with special attention given to fuel management in higher fire risk areas, and that new development in fire hazard areas should be configured to minimize the potential for added danger. Implementation strategies for this policy include identifying high risk areas, developing and implementing mitigation efforts to reduce the threat of fire, requiring fire resistant material be used for building construction in fire hazard areas, and encouraging applicants applying for subdivisions in fire hazard areas to cluster development to allow for a wildfire protection zone.

The California Fire Code provides minimum standards for many aspects of fire prevention and suppression activities. These standards include provisions for emergency vehicle access, water supply, fire protection systems, and the use of fire resistant building materials.

The County EOP outlines the emergency measures that are essential for protecting public health and safety. These measures include, but are not limited to, public alert and notifications, emergency public information, and protective actions. The EOP also addresses policy and coordination related to emergency management.

Discussion

(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The project does not require any road closures and would be designed to accommodate emergency vehicle access. Implementation of the proposed project would not have a permanent impact on any adopted emergency response plans or emergency evacuation plans. Temporary construction activities and staging would not substantially alter existing circulation patterns or trips. Access to adjacent areas would be maintained throughout the duration of the project. There are adequate alternative routes available to accommodate any rerouted trips through the project area for the short-term construction period.

Based on the County's Land Use View tool and Dam and Levee Failure Plan, the project is not located within an area that would be inundated in the event of failure of the Lake Nacimiento Dam. The project would not impair implementation or physically interfere with County hazard mitigation or emergency plans; therefore, no impacts related to emergency plans would occur.

Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Potential impacts would be *less than significant.*

(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The site is located within a State Responsibility Area and, based on the County's fire response time map, it would take approximately 0-5 minutes to respond to a call regarding fire or life safety. The project would be designed to comply with all fire safety rules and regulations, including the California Fire Code and Building Code (see Section IX, Hazards and Hazardous Materials). The County Fire Department/California Department of Forestry and Fire Protection (CAL FIRE) prepared a Fire Safety Plan letter for the project (April 9, 2020), and the project will be conditioned to comply with the recommended conditions for the life of the project.

The project would be located on slight to moderate slopes. Winds in the area vary from 6-8 miles per hour and primarily come from the north (October-April) and west (April-October). As described in Section VII, Geology and Soils, the potential for landslides in the project area is high; however, the project is not proposing disturbance in areas of steep slopes that would be conducive to the formation of debris flows in the nearby existing channels.

Therefore, potential impacts would be *less than significant.*

(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project would be designed to comply with all fire safety rules and regulations, including the California Fire Code and Public Resources Code. These infrastructure improvements would reduce fire risk. Therefore, potential impacts would be *less than significant.*

(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project would be located on slight to moderate slopes. Winds in the area vary from 6-8 miles per hour and primarily come from the north (October-April) and west (April-October). As described in Section VII, Geology and Soils, the potential for landslides in the project area is high. However, the project does not include any design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be *less than significant*.

Conclusion

The project would not expose people or structures to new or exacerbated wildfire risks and would not require the development of new or expanded infrastructure or maintenance to reduce wildfire risks. Therefore, potential impacts associated with wildfire would be less than significant and no mitigation measures are necessary.

Mitigation

None necessary.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially 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, substantially 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?	☐	☒	☐	☐
(b)	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)?	☐	☒	☐	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

(a) *Does the project have the potential to substantially 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, substantially 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?*

As discussed in each resource section above, upon implementation of identified mitigation measures, the proposed project would not result in significant impacts to biological or cultural resources and would not 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. Therefore, impacts would be *less than significant with mitigation incorporated.*

(b) 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)?

The State CEQA Guidelines define cumulative impacts as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 of the State CEQA Guidelines further states that individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects. The State CEQA Guidelines state that the discussion of cumulative impacts should reflect the severity of the impacts as well as the likelihood of their occurrence. However, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Furthermore, the discussion should remain practical and reasonable in considering other projects and related cumulatively considerable impacts.

The project site is within Heritage Ranch and the area governed by the Heritage Ranch Village Plan. The cumulative environmental impacts associated with buildout of the Plan area, including the project site, was assessed by the Heritage Ranch Village Plan EIR in 1980.

(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Environmental impacts that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. In addition, implementation of mitigation measures AQ-1 through AQ-2, HAZ-and HAZ-2, and identified in in the resource sections above would reduce potential adverse effects on human beings to less than significant; therefore, impacts would be *less than significant with mitigation.*

Conclusion

Potential impacts would be less than significant upon implementation of mitigation measures identified in the resource sections above.

Exhibit A - Initial Study References and Agency Contacts

The County Planning Department has contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with an ☒) and when a response was made, it is either attached or in the application file:

Contacted	Agency	Response
☒	County Public Works Department	**In File****
☐	County Environmental Health Services	**Not Applicable**
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☐	Air Pollution Control District	**Not Applicable**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☐	CA Coastal Commission	**Not Applicable**
☐	CA Department of Fish and Wildlife	**Not Applicable**
☒	CA Department of Forestry (Cal Fire)	**In File****
☐	CA Department of Transportation	**Not Applicable**
☒	Heritage Ranch Community Services District	**In File****
☒	Other Heritage Ranch HOA	**In File****
☒	Other AB 52 Tribes	**In File****

** "No comment" or "No concerns"-type responses are usually not attached

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Department of Planning and Building.

☒ Project File for the Subject Application

County Documents

☐ Coastal Plan Policies
☒ Framework for Planning (Coastal/Inland)
☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
- ☒ Agriculture Element
- ☒ Conservation & Open Space Element
- ☐ Economic Element
- ☒ Housing Element
- ☒ Noise Element
- ☒ Parks & Recreation Element/Project List
- ☒ Safety Element

☒ Land Use Ordinance (Inland/Coastal)
☒ Building and Construction Ordinance
☒ Public Facilities Fee Ordinance
☐ Real Property Division Ordinance
☐ Affordable Housing Fund
☐ Airport Land Use Plan
☒ Energy Wise Plan
☒ North County Area Plan/Nacimiento Sub Area
☐ Design Plan
☐ Specific Plan
☐ Annual Resource Summary Report
☐ Circulation Study

Other Documents

☒ Clean Air Plan/APCD Handbook
☒ Regional Transportation Plan
☒ Uniform Fire Code
☒ Water Quality Control Plan (Central Coast Basin – Region 3)
☐ Archaeological Resources Map
☐ Area of Critical Concerns Map
☐ Special Biological Importance Map
☐ CA Natural Species Diversity Database
☒ Fire Hazard Severity Map
☒ Flood Hazard Maps
☒ Natural Resources Conservation Service Soil Survey for SLO County
☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
☒ Heritage Ranch Village Plan and Lake Nacimiento Resort Specific Plan

Initial Study – Environmental Checklist

In addition, the following project-specific information and/or reference materials have been considered as a part of the Initial Study:

The project application materials are incorporated by reference and available for review at the Department of Planning and Building, 976 Osos Street, Suite 200, San Luis Obispo.

Project-Specific Studies

Althouse and Meade, Inc., August 2019, Biological Report for RV Storage at Heritage Ranch

Althouse and Meade, Inc. April 2020, Spring Botanical Survey Letter for RV Storage at Heritage Ranch

GeoSolutions, Inc., September 27, 2019, Soils Engineering Report Heritage Ranch RV Storage

GeoSolutions, Inc., September 30, 2019, Engineering Geology Investigation Heritage Ranch RV Storage

Padre Associates, Inc., April 2020, Phase I Archaeological Study, RV/Boat Storage Facility and Potential Expansion Area

Agency References

June 3, 2019 letter from Scott B. Duffield, Heritage Ranch Community Services District

June 14, 2019 letter from Timm Platt, Heritage Ranch Homeowners Association

June 26, 2019 letter from Mark Davis, Public Works Department

August 15, 2019 Will-Serve Letter from Scott B. Duffield, Heritage Ranch Community Services District

August 28, 2019 letter from Michael Stoker, Building Division

December 16, 2019 e-mail from Fred Collins, Northern Chumash Tribal Council

April 9, 2020 letter from Dell Wells, Cal Fire / County Fire

April 23, 2020 e-mail from Patti Dunton, Salinan Tribe

Other County References

California Department of Conservation (CDOC). 2015. CGS Information Warehouse: Regulatory Maps http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps accessed August 2018

San Luis Obispo County.1999.General Plan Safety Element. https://www.slocounty.ca.gov/getattachment/893b6c58-7550-4113-911c-3ef46d22b7c8/Safety-Element.aspx accessed August 2018

Barros, Ana M.G., Jose M.C. Pereira, Max A. Moritz, and Scott L. Stephens. 2013. Spatial Characterization of Wildfire Orientation Patterns in California. Forests 2013, 4; Pp 197-217." 2013.

California Department of Conservation (CDOC). 2015. Fault Activity Map of California. Available at < http://maps.conservation.ca.gov/cgs/fam/>.

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California Department of Conservation (CDOC). 2019. San Luis Obispo County Tsunami Inundation Maps. Available at <https://www.conservation.ca.gov/cgs/tsunami/maps/San-Luis-Obispo>

California Department of Forestry and Fire Protection (CAL FIRE). 2007. "Draft Fire Hazard Severity Zones in Local Responsibility Areas." Available at <http://frap.fire.ca.gov/webdata/maps/san_luis_obispo/fhszl06_1_map.40.pdf>

California Department of Toxic Substances Control (DTSC). 2019. EnviroStor. Available at <https://www.envirostor.dtsc.ca.gov/public/>

California Department of Transportation (Caltrans). 2019. California Scenic Highways Mapping Tool. Available at: < https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a>.

California Geological Survey (CGS). 2015. CGS Information Warehouse: Mineral Land Classification. Available at <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

County of San Luis Obispo. 2016. 2015/2016 County Bikeways Plan. July 6th, 2016.

County of San Luis Obispo Staff. 2019. California Emissions Estimator Model (CalEEMod) Results.

Diblee, Thomas W., Jr. 2004. Geologic Map of the Creston & Shedd Canyon Quadrangles, San Luis Obispo County, California. National Geologic Map Database. Available at: <https://ngmdb.usgs.gov/Prodesc/proddesc_71748.htm>.

Pacific Gas and Electric (PG&E). 2019. Delivering Low-Emission Energy. Available at: <https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page>.

San Luis Obispo Air Pollution Control District (SLOAPCD). 2012. CEQA Air Quality Handbook. April 2012.

San Luis Obispo Air Pollution Control District (SLOAPCD). 2017. Clarification Memorandum for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook. November 2017.

State Water Resources Control Board (SWRCB). 2015. GeoTracker. Available at <http://geotracker.waterboards.ca.gov/>

U.S. Department of Agriculture (USDA). 1983. Soil Survey of San Luis Obispo County, California, Paso Robles Area. U.S. Department of Agriculture, Soil Conservation Service. May 1983. Available at: <https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/sanluisCA1983/sanluisCA1983.pdf>

U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 2017. Web Soil Survey. Available at <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx> Accessed April 17, 2019.

United States Geological Survey (USGS). 2019. Areas of Land Subsidence in California. Available at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html

Exhibit B - Mitigation Summary Table

Per Public Resources Code Section 21081.6, the following measures also constitute the mitigation monitoring and/or reporting program that would reduce potentially significant impacts to less than significant levels. These measures would become conditions of approval (COAs) should the project be approved. The Lead Agency (County) or other Responsible Agencies, as specified in the following measures, are responsible to verify compliance with these COAs.

Air Quality

AQ-1 **Construction Equipment Emissions Controls.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. Use diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
4. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
5. Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NOx exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle for more than 5 minutes.
7. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit;
8. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
9. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
10. Electrify equipment when feasible;
11. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,
12. Use alternatively fueled construction equipment onsite where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

Initial Study – Environmental Checklist

AQ-2 **Fugitive Dust Construction Control Measures.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

1. Reduce the amount of the disturbed area where possible;
2. Use 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 miles per hour. Reclaimed (non-potable) water should be used whenever possible;
3. All dirt stockpile areas shall be sprayed daily as needed;
4. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;
5. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
6. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress.

Biological Resources

Oak Trees

BIO-1 An oak tree mitigation plan shall be prepared by a Certified Arborist and approved by the County of San Luis Obispo. The mitigation plan shall incorporate the most current County standards for mitigating impacts to oak and pine trees, and oak woodland habitat.

BIO-2 Impacts to the oak canopy or critical root zone (CRZ) should be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-3 Prior to groundbreaking, tree protection fencing shall be installed as close to the outer limit of the CRZ as practicable for construction operations. The fencing shall be in place throughout the duration of the project, and removed only under the direction of the project's Certified Arborist.

BIO-4 Trenching within the CRZ must be approved by the project's Certified Arborist, and shall be done by hand or with an air spade. Any roots exposed during construction shall be evaluated and treated by the project's Certified Arborist.

BIO-5 Landscape material within the CRZ must be of native, drought tolerant species. Lawns are prohibited within the CRZ.

BIO-6 Paving adjacent to, and within the CRZ shall utilize interlocking pavers or equivalent that will allow proper infiltration of water and exchange of oxygen to the root zone of the tree.

BIO-7 Tree removal, if approved, shall commence within 30 days of inspection by a qualified biologist to determine the tree is not being used by nesting birds or bats at the time of removal.

BIO-8 Impacts to oak trees shall be assessed by a Certified Arborist. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-9 Impacts to native trees shall be mitigated by planting additional trees on site. Any oak tree with a dbh of five inches or greater shall require mitigation. Oak trees removed shall be replaced in kind at a 4:1 ratio. Impacts to oak trees shall be mitigated by planting additional oak trees, in kind, at a 2:1 ratio. Replacement trees shall be of one-gallon size, of local origin, and of the same species as was impacted. Replacement trees shall be seasonally maintained and monitored annually for at least seven years.

BIO-10 Prior to commencement of Project construction activities, tree protection fencing shall be installed along the outer limit of the critical root zone (1.5 times the trunk diameter) of all oak trees within 50 feet of Project activities. The fencing shall be in place for the duration of the construction occurring within 50 feet of the trees. Where approved Project activities are within the critical root zone, fencing shall be temporarily moved to facilitate the work. A Certified Arborist shall be present during approved Project activities within the critical root zone to document impacts to the trees, and shall provide a written report to the County of any mitigation obligation.

Native Grassland

BIO-11 A County-approved biologist shall develop a Native Perennial Grassland Restoration Plan that provides specific measures to enhance and maintain the remaining on-site occurrences of needle grass – melic grass grassland to be approved by the County. This Plan shall be focused on adaptive management principles, and shall identify detailed enhancement areas and strategies based on the parameters outlined below, with timing and monitoring long-term requirements. The Plan shall:

a. Provide an up-to-date inventory of on-site occurrences of native perennial grassland habitat;

b. Define attainable and measurable goals and objectives to achieve through implementation of the Plan;

c. Provide site selection and justification;

d. Detail restoration work plan including methodologies, restoration schedule, plant materials (seed), and implementation strategies.

e. Provide a detailed maintenance plan to include mowing to provide a sufficient disturbance regime to keep non-native plant species from further reducing the extent of this habitat type on the property over time. This approach would also have the residual benefit of providing wildland fire protection. Enhancement and maintenance options shall employ recent techniques and effective strategies for increasing the overall area of native perennial grassland on-site and shall include but not be limited to reseeding disturbed areas with an appropriate native plant palette;

f. Define performance standards within the agriculture residential cluster subdivision project area, the restored area shall include at least a 2: 1 ratio with at least 10 percent cover by native perennial grasses; and,

g. Provide a monitoring plan to include methods and analysis of results. Also, include methodology to determine success or failure of restoration enhancement and an adaptive management plan.

Surface Water Quality

BIO-12 A SWPPP shall be developed and implemented. Construction activities shall implement Best Management Practices to adequately address prevention of sedimentation into drainages. The plan shall include a schedule of BMP inspection and maintenance.

BIO-13 All hazardous materials shall be properly stored within secondary containment. All portable generators and portable toilets shall also be staged within secondary containment.

BIO-14 Construction activities within 100 feet of drainages should be scheduled to the maximum extent practicable to occur outside of the rainy season (November through April).

BIO-15 Project activity occurring within 50 feet of aquatic habitat (e.g., swales, drainages, ponds, vernal pool, etc., identified in biological report) shall occur during the dry season (between June 1 and September 31). For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining controls, which shall be implemented to prevent erosion and sedimentation into drainages and wetlands. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other

industry standard materials. These controls shall be installed and maintained for the duration of the project.

BIO-16 No equipment fueling, hazardous materials storage, portable restrooms, concrete washouts, or overnight vehicle or equipment staging shall be permitted within 100 feet of aquatic features during construction.

BIO-17 **Protection of State Water and Wetlands (if present on site) -** Prior to project initiation, all applicable agency permits with jurisdiction over the project area (e.g., California Department of Fish and Wildlife [CDFW], Regional Water Quality Control Board) shall be obtained, as necessary. Any additional measures required by these agencies shall be implemented as necessary throughout the project.

Nesting Birds

BIO-18 **Pre-construction Survey for Sensitive and Nesting Birds.** If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to initial project activity beginning, including ground disturbance and/or vegetation removal/trimming. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active.

- A 50-foot exclusion zone shall be placed around non-listed, passerine species, and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius of 50 feet (non-listed passerine species) or 250 feet (raptor species). All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the young have fledged or that proposed project activities would not cause adverse impacts to the nest, adults, eggs, or young.
- If special-status avian species (aside from burrowing owl) are identified and nesting within the work area, no work will begin until an appropriate exclusion zone is determined in consultation with the County and any relevant resource agencies.
- The results of the survey shall be provided to the County prior to initial project activities. The results shall detail appropriate fencing or flagging of exclusion zones and include recommendations for additional monitoring requirements. A map of the project site and nest locations shall be included with the results. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended exclusion zone depending on site conditions and species (if non-listed).
- If two weeks lapse between different phases of project activities (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the nesting bird survey shall be repeated.

Legless Lizard

BIO-19 A focused preconstruction survey for legless lizards shall be conducted in proposed work areas immediately prior to ground-breaking activities that would affect potentially suitable habitat, as determined by the project biologist. The preconstruction survey shall be conducted by a qualified biologist familiar with legless lizard ecology and survey methods, and with approval from California Department of Fish and Wildlife to relocate legless lizards out of harm's way. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required. If legless lizards are found to be present in the proposed work areas the following steps shall be taken:

d. Legless lizards shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.

e. Construction monitoring shall be required for all new ground-breaking activities located within legless lizard habitat. Construction monitors shall capture and relocate horned lizards as specified above.

f. A letter report shall be submitted to the County and CDFW within 30 days of legless lizard relocation, or as directed by CDFW.

Burrowing Owl

BIO-20 **Pre-construction Survey for BUOW**. If work is planned to occur within 150 meters (approximately 492 feet) of BUOW habitat, a qualified biologist shall conduct a pre-construction survey for the species within 14 days prior to initial project activities. A second survey shall be completed immediately prior to initial project activities (i.e., within the preceding 24 hours). This applies year-round (i.e., within the breeding (February 1 to August 31) or non-breeding (September 1 to January 31) seasons. The pre-construction surveys shall be conducted to determine no burrowing owls are present in the work areas.

The surveys shall be consistent with the methods outlined in Appendix D of the CDFW 2012 Staff Report on BUOW Mitigation, which specifies that 7- to 20-meter transects shall be walked, such that the entire project area is visible. These surveys may be completed concurrently with SJKF, American badger, or other special-status species surveys.

If occupied BUOW burrows are identified the following exclusion zones shall be observed during project activities, unless otherwise authorized by CDFW:

Location	Time of Year	Level of Disturbance		
		Low	Medium	High
Nesting Sites	April 1 – Aug 15	656 feet	1,640 feet	1,640 feet
Nesting Sites	Aug 16 – Oct 15	656 feet	656 feet	1,640 feet
Any Occupied Burrow	Oct 16 – Mar 31	164 feet	328 feet	1,640 feet

Each exclusion zone shall encircle the burrow and have a radius as specified in the table above. All foot and vehicle traffic, as well as all project activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the burrow is no longer in use.

If two weeks lapse between construction phases (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the BUOW survey shall be repeated.

Bats

BIO-21 Prior to removal of any trees over 20 inches dbh, a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. The survey may include visual inspection of potential roost trees and/or acoustic surveys using bat detectors. If a non-maternal roost is found, the qualified biologist, with prior approval from California Department of Fish and Wildlife, will install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

American Badger

BIO-22 **Pre-construction survey for American badgers**. A qualified biologist shall complete a pre-construction survey for badgers no less than 14 days and no more than 30 days prior to the start of initial project activities to determine if badgers are present within proposed work areas, in addition to a 200-foot buffer around work areas. The results of the survey shall be provided to the County prior to initial project activities.

- If a potential den is discovered, the den will be monitored for 3 consecutive nights with an infra-red, motion-triggered camera, prior to any project activities, to determine if the den is being used by an American badger.
- If an active badger den is found, an exclusion zone shall be established around the den. A minimum of a 50-foot exclusion zone shall be established during the non-reproductive season (July 1 to January 31) and a minimum 100-foot exclusion zone during the reproductive season (February 1 to June 30). Each exclusion zone shall encircle the den and have a radius of 50 feet (non-reproductive season) or 100 feet (reproductive season), measured outward from the burrow entrance. All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the den is no longer in use. If avoidance is not possible during project construction or continued operation, the County shall be contacted. The County will coordinate with appropriate resource agencies for guidance.

  If more than 30 days pass between construction phases (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the badger survey shall be repeated.

Hazards and Hazardous Waste

HAZ-1 **Equipment Maintenance and Refueling**. During all construction and vehicle maintenance activities, the cleaning, refueling, and maintenance of equipment and vehicles shall occur only within designated areas. These areas shall conform to all Best Management Practices applicable to attaining zero discharge of stormwater runoff. At a minimum, all construction equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

HAZ-2 **Spill Response Protocol**. During all construction and vehicle maintenance activities, all project-related spills of hazardous materials shall be cleaned up immediately. Appropriate spill prevention and cleanup materials shall be onsite at all times during construction and ongoing operations.

June 11, 2020

DEVELOPER'S STATEMENT & MITIGATION MONITORING/REPORTING PROGRAM
FOR SNUG HARBOR SITE PLAN DRC2019-00099
ED20-116

The applicant agrees to incorporate the following measures into the project. These measures become a part of the project description and therefore become a part of the record of action upon which the environmental determination is based. All development activity must occur in strict compliance with the following mitigation measures. These measures shall be perpetual and run with the land. These measures are binding on all successors in interest of the subject property.

Per Public Resources Code Section 21081.6 the following measures also constitute the mitigation monitoring and/or reporting program that will reduce potentially significant impacts to less than significant levels. These measures will become conditions of approval (COAs) should the project be approved. The Lead Agency (County) or other Responsible Agencies, as specified in the following measures, is responsible to verify compliance with these COAs.

Project Description: A request by **Snug Harbor LLC** for Site Plan approval (DRC2019-00099) for the construction of a 6.6-acre private storage facility for recreational vehicles and boats. The project will result in approximately 6.6 acres of site disturbance, including 14,930 cubic yards of cut and fill, on a 10.22-acre site, and includes construction of an 8,500 square foot, two-story building that will house a check-in area, office, caretaker residence, and maintenance shop. The project is located on the east side of Heritage Road, directly opposite the boat launch, approximately 800 feet north of Heritage Loop in the village of Heritage Ranch. The project is within the Recreation land use category and the Nacimiento Sub Area of the North County Planning Area.

Note:	The items contained in the boxes labeled "Monitoring" describe the County procedures to be used to ensure compliance with the mitigation measures.

AIR QUALITY

AQ-1 **Construction Equipment Emissions Controls.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel-powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. Use diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
4. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
5. Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures

(e.g., captive or NOx exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle for more than 5 minutes.
7. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit;
8. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
9. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
10. Electrify equipment when feasible;
11. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,
12. Use alternatively fueled construction equipment onsite where feasible, such as compressed natural gas, liquefied natural gas, propane or biodiesel.

AQ-2 **Fugitive Dust Construction Control Measures.** Prior to issuance of construction permits, the following measures shall be incorporated into the construction phase of the project and shown on all applicable plans:

1. Reduce the amount of the disturbed area where possible;
2. Use 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 miles per hour. Reclaimed (non-potable) water should be used whenever possible;
3. All dirt stockpile areas shall be sprayed daily as needed;
4. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;
5. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
6. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress.

Monitoring: Department of Planning and Building shall verify compliance in consultation with the Environmental Coordinator and San Luis Obispo Air Pollution Control District.

BIOLOGICAL RESOURCES

Oak Trees

BIO-1 An oak tree mitigation plan shall be prepared by a Certified Arborist and approved by the County of San Luis Obispo. The mitigation plan shall incorporate the most current County standards for mitigating impacts to oak and pine trees, and oak woodland habitat.

BIO-2 Impacts to the oak canopy or critical root zone ("CRZ") should be avoided where

practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-3 Prior to groundbreaking, tree protection fencing shall be installed as close to the outer limit of the CRZ as practicable for construction operations. The fencing shall be in place throughout the duration of the project, and removed only under the direction of the project's Certified Arborist.

BIO-4 Trenching within the CRZ must be approved by the project's Certified Arborist, and shall be done by hand or with an air spade. Any roots exposed during construction shall be evaluated and treated by the project's Certified Arborist.

BIO-5 Landscape material within the CRZ must be of native, drought tolerant species. Lawns are prohibited within the CRZ.

BIO-6 Paving adjacent to, and within the CRZ shall utilize interlocking pavers or equivalent that will allow proper infiltration of water and exchange of oxygen to the root zone of the tree.

BIO-7 Tree removal, if approved, shall commence within 30 days of inspection by a qualified biologist to determine the tree is not being used by nesting birds or bats at the time of removal.

BIO-8 Impacts to oak trees shall be assessed by a Certified Arborist. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

BIO-9 Impacts to native trees shall be mitigated by planting additional trees on site. Any oak tree with a dbh of five inches or greater shall require mitigation. Oak trees removed shall be replaced in kind at a 4:1 ratio. Impacts to oak trees shall be mitigated by planting additional oak trees, in kind, at a 2:1 ratio. Replacement trees shall be of one-gallon size, of local origin, and of the same species as was impacted. Replacement trees shall be seasonally maintained and monitored annually for at least seven years.

BIO-10 Prior to commencement of Project construction activities, tree protection fencing shall be installed along the outer limit of the critical root zone (1.5 times the trunk diameter) of all oak trees within 50 feet of Project activities. The fencing shall be in place for the duration of the construction occurring within 50 feet of the trees. Where approved Project activities are within the critical root zone, fencing shall be temporarily moved to facilitate the work. A Certified Arborist shall be present during approved Project activities within the critical root zone to document impacts to the trees, and shall provide a written report to the County of any mitigation obligation.

Native Grassland

BIO-11 A County-approved biologist shall develop a Native Perennial Grassland Restoration Plan that provides specific measures to enhance and maintain the remaining on-site occurrences of needle grass – melic grass grassland to be approved by the County. This Plan shall be focused on adaptive management principles, and shall identify detailed enhancement areas and strategies based on the parameters outlined below, with timing and monitoring long-term requirements. The Plan shall:

a. Provide an up-to-date inventory of on-site occurrences of native perennial grassland habitat;
b. Define attainable and measurable goals and objectives to achieve through implementation of the Plan;
c. Provide site selection and justification;
d. Detail restoration work plan including methodologies, restoration schedule, plant materials (seed), and implementation strategies.
e. Provide a detailed maintenance plan to include mowing to provide a sufficient disturbance regime to keep non-native plant species from further reducing the extent of this habitat type on the property over time. This approach would also have the residual benefit of providing wildland fire protection. Enhancement and maintenance options shall employ recent techniques and effective strategies for increasing the overall area of native perennial grassland on-site and shall include but not be limited to reseeding disturbed areas with an appropriate native plant palette;
f. Define performance standards within the agriculture residential cluster subdivision project area, the restored area shall include at least a 2: 1 ratio with at least 10 percent cover by native perennial grasses; and,
g. Provide a monitoring plan to include methods and analysis of results. Also, include methodology to determine success or failure of restoration enhancement and an adaptive management plan.

Surface Water Quality

BIO-12 A SWPPP shall be developed and implemented. Construction activities shall implement Best Management Practices to adequately address prevention of sedimentation into drainages. The plan shall include a schedule of BMP inspection and maintenance.

BIO-13 All hazardous materials shall be properly stored within secondary containment. All portable generators and portable toilets shall also be staged within secondary containment.

BIO-14 Construction activities within 100 feet of drainages should be scheduled to the maximum extent practicable to occur outside of the rainy season (November through April).

BIO-15 Project activity occurring within 50 feet of aquatic habitat (e.g., swales, drainages, ponds, vernal pool, etc., identified in biological report) shall occur during the dry season (between June 1 and September 31). For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining controls, which shall be implemented to prevent erosion and sedimentation into drainages and wetlands. Acceptable stabilization methods include the use

of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other industry standard materials. These controls shall be installed and maintained for the duration of the project.

BIO-16 No equipment fueling, hazardous materials storage, portable restrooms, concrete washouts, or overnight vehicle or equipment staging shall be permitted within 100 feet of aquatic features during construction.

BIO-17 Protection of State Water and Wetlands (if present on site) - Prior to project initiation, all applicable agency permits with jurisdiction over the project area (e.g., California Department of Fish and Wildlife ["CDFW"], Regional Water Quality Control Board) shall be obtained, as necessary. Any additional measures required by these agencies shall be implemented as necessary throughout the project.

Nesting Birds

BIO-18 Pre-construction Survey for Sensitive and Nesting Birds. If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to initial project activity beginning, including ground disturbance and/or vegetation removal/trimming. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active.

- A 50-foot exclusion zone shall be placed around non-listed, passerine species, and a 250-foot exclusion zone will be implemented for raptor species. Each exclusion zone shall encircle the nest and have a radius of 50 feet (non-listed passerine species) or 250 feet (raptor species). All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the young have fledged or that proposed project activities would not cause adverse impacts to the nest, adults, eggs, or young.
- If special-status avian species (aside from burrowing owl) are identified and nesting within the work area, no work will begin until an appropriate exclusion zone is determined in consultation with the County and any relevant resource agencies.
- The results of the survey shall be provided to the County prior to initial project activities. The results shall detail appropriate fencing or flagging of exclusion zones and include recommendations for additional monitoring requirements. A map of the project site and nest locations shall be included with the results. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended exclusion zone depending on site conditions and species (if non-listed).
- If two weeks lapse between different phases of project activities (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the nesting bird survey shall be repeated.

Legless Lizard

BIO-19 A focused preconstruction survey for legless lizards shall be conducted in proposed work areas immediately prior to ground-breaking activities that would affect potentially suitable habitat, as determined by the project biologist. The preconstruction survey shall be conducted by a

qualified biologist familiar with legless lizard ecology and survey methods, and with approval from California Department of Fish and Wildlife to relocate legless lizards out of harm's way. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required. If legless lizards are found to be present in the proposed work areas the following steps shall be taken:

a. Legless lizards shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.
b. Construction monitoring shall be required for all new ground-breaking activities located within legless lizard habitat. Construction monitors shall capture and relocate horned lizards as specified above.
c. A letter report shall be submitted to the County and CDFW within 30 days of legless lizard relocation, or as directed by CDFW.

Burrowing Owl

BIO-20 Pre-construction Survey for BUOW. If work is planned to occur within 150 meters (approximately 492 feet) of BUOW habitat, a qualified biologist shall conduct a pre-construction survey for the species within 14 days prior to initial project activities. A second survey shall be completed immediately prior to initial project activities (i.e., within the preceding 24 hours). This applies year-round (i.e., within the breeding (February 1 to August 31) or non-breeding (September 1 to January 31) seasons. The pre-construction surveys shall be conducted to determine no burrowing owls are present in the work areas.

The surveys shall be consistent with the methods outlined in Appendix D of the CDFW 2012 Staff Report on BUOW Mitigation, which specifies that 7- to 20-meter transects shall be walked, such that the entire project area is visible. These surveys may be completed concurrently with SJKF, American badger, or other special-status species surveys.

If occupied BUOW burrows are identified the following exclusion zones shall be observed during project activities, unless otherwise authorized by CDFW:

Location	Time of Year	Level of Disturbance		
		Low	Medium	High
Nesting Sites	April 1 – Aug 15	656 feet	1,640 feet	1,640 feet
Nesting Sites	Aug 16 – Oct 15	656 feet	656 feet	1,640 feet
Any Occupied Burrow	Oct 16 – Mar 31	164 feet	328 feet	1,640 feet

Each exclusion zone shall encircle the burrow and have a radius as specified in the table above. All foot and vehicle traffic, as well as all project activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the burrow is no longer in use.

If two weeks lapse between construction phases (e.g., vegetation trimming and the start of

grading), during which no or minimal work activity occurs, the BUOW survey shall be repeated.

Bats

BIO-21 Prior to removal of any trees over 20 inches dbh, a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. The survey may include visual inspection of potential roost trees and/or acoustic surveys using bat detectors. If a non-maternal roost is found, the qualified biologist, with prior approval from California Department of Fish and Wildlife, will install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

American Badger

BIO-22 Pre-construction survey for American badgers. A qualified biologist shall complete a pre-construction survey for badgers no less than 14 days and no more than 30 days prior to the start of initial project activities to determine if badgers are present within proposed work areas, in addition to a 200-foot buffer around work areas. The results of the survey shall be provided to the County prior to initial project activities.

- If a potential den is discovered, the den will be monitored for 3 consecutive nights with an infra-red, motion-triggered camera, prior to any project activities, to determine if the den is being used by an American badger.
- If an active badger den is found, an exclusion zone shall be established around the den. A minimum of a 50-foot exclusion zone shall be established during the non-reproductive season (July 1 to January 31) and a minimum 100-foot exclusion zone during the reproductive season (February 1 to June 30). Each exclusion zone shall encircle the den and have a radius of 50 feet (non-reproductive season) or 100 feet (reproductive season), measured outward from the burrow entrance. All project activities, including foot and vehicle traffic and storage of supplies and equipment, are prohibited inside exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, or it has been determined by a qualified biologist that the den is no longer in use. If avoidance is not possible during project construction or continued operation, the County shall be contacted. The County will coordinate with appropriate resource agencies for guidance.

If more than 30 days pass between construction phases (e.g., vegetation trimming and the start of grading), during which no or minimal work activity occurs, the badger survey shall be repeated.

Monitoring: Department of Planning and Building shall verify compliance (BR-1 through BR-22) in consultation with the Environmental Coordinator.

HAZARDS AND HAZARDOUS WASTES

HAZ-1 Equipment Maintenance and Refueling. During all construction and vehicle maintenance activities, the cleaning, refueling, and maintenance of equipment and vehicles shall occur only

within designated areas. These areas shall conform to all Best Management Practices applicable to attaining zero discharge of stormwater runoff. At a minimum, all construction equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

HAZ-2 **Spill Response Protocol.** During all construction and vehicle maintenance activities, all project-related spills of hazardous materials shall be cleaned up immediately. Appropriate spill prevention and cleanup materials shall be onsite at all times during construction and ongoing operations.

Monitoring: Department of Planning and Building shall verify compliance (HZ-1 through HZ-2) in consultation with the Environmental Coordinator.

The applicant understands that any changes made to the project description subsequent to this environmental determination must be reviewed by the Environmental Coordinator and may require a new environmental determination for the project. By signing this agreement, the owner(s) agrees to and accepts the incorporation of the above measures into the proposed project description.

Signature of Owner	Name (Print)	Date
Snug Harbor, LLC by [signature]	Snug Harbor, LLC By C J Rudolph	6/11/20