CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT INFORMATION

PROJECT TITLE: Formerly Used Defense Site Camp San Luis Obispo -Munitions Response Site 09 - Remedial Investigation / Feasibility Study		SITE CODING: 200604-47
PROJECT ADDRESS: 2990 Dairy Creek Road San Luis Obispo CA 93405	CITY: San Luis Obispo	COUNTY: San Luis Obispo
PROJECT SPONSOR: United States Army Corps of Engineers	CONTACT: Bruce R. James	PHONE: (213) 452-3988
APPROVAL ACTION UNDER CONSIDERATION BY DTSC: ☐ Initial Permit Issuance ☐ Permit Re-Issuance ☐ Permit Modification ☐ Closure Plan ☒ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations ☐ Corrective Measure Study/Statement of Basis ☐ Other (specify):		
STATUTORY AUTHORITY: ☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):		
DTSC PROGRAM/ADDRESS: Site Mitigation and Restoration Program 8800 Cal Center Drive Sacramento CA 95826	CONTACT: Jim Adams Dominique Forrester	PHONE: (916) 255-3464 (916) 255-3613

PROJECT DESCRIPTION:

The purpose of this project is to investigate, identify and/or treat any former military munitions that may be still present at the CSLO Munitions Response Site (MRS) 09. The proposed activities include investigation (by personnel walking the site using battery operated geophysical equipment); excavation with hand tools of individually identified subsurface MEC/anomalies; treatment of collected items, which may include MEC open detonation; and transportation of equipment on existing roads.

In accordance with California Health and Safety Code, Chapter 6.8, Section 25300 et seq., the project is the proposed approval by DTSC of a Remedial Investigation / Feasibility Study (RI/FS) Quality Assurance Project Plan (QAPP) for Camp San Luis Obispo (CSLO) (October 2019) to investigate Munitions Response Site (MRS) 09, CSLO. The United States Army Corps of Engineers proposes to execute the RI/FS to define target areas at MRS 09, CLSO (the Site). During the investigation, there is a remote chance that munitions or explosives of concern (MEC) will be found that are unsafe to move and need to be disposed of by detonation. The RI/FS (July 2020) is incorporated by reference.

Location: The Site is situated along Highway 1, approximately five miles northwest of San Luis Obispo, California. Investigation area is shown on Figure 1 located at the end of this document. The 26-acre CSLO MRS 09 is located in San Luis Obispo County, California; approximately 8 miles east of the Pacific Ocean (at Morro Bay) and approximately 5 miles northwest of U.S. Highway 101 between the cities of San Luis Obispo and Morro Bay (See Figure A). The population in San Luis Obispo County is approximately 284,010 (U.S. Census Bureau, 2018). Based on observations made during previous site visits, there is one private residence (associated with the shooting range facility) less than 0.25 miles to the west of the MRS, 66 occupied structures within 2 miles of the MRS, and there are business and recreational facilities associated with the public shooting range located adjacent to and within the MRS. These business and recreational facilities have low daily occupancy rates.

CSLO MRS 09 is situated on two parcels (See Figure C). One parcel (19 acres of the MRS) is owned by the California Department of Fish & Wildlife (CDFW) and designated as the San Luis Obispo Wildlife Area. A portion of this parcel is also used as a public shooting range operated by the San Luis Obispo Sportsman's Association (SLOSA) for long range targets (i.e., no firing points are located within the MRS; only target stands). The second parcel (7 acres of the MRS) is owned by Cal Poly and is used for agricultural purposes including cattle grazing (See Figure B). The property within CSLO MRS 09 is zoned for agricultural uses and includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09). There are no permanently occupied structures within the MRS. The site consists mainly of rolling hills and grasslands and terrain sloping from south to north, with elevation ranging from 160 to 200 feet (ft.) above sea level, including a large hill in the middle of the MRS. The surface layer of soil is of clay and loam.

BACKGROUND: CSLO was established in 1928 by California as a National Guard Camp. The U.S. Army took over Camp Merriam and renamed it Camp San Luis Obispo in 1940. Additional lands were added in the early 1940s until the total acreage reached 14,959. Although the available historical information does not indicate how the land was transferred from the State of California to the Department of the Army, historical records do indicate that between 1945 and 1952, the Department of the Army owned, and leased land used for CSLO. The records, which are inventories of owned, sponsored and leased facilities, indicate that the maximum amount of land owned was 12,958 acres between 1946 and 1948, along with 6,069 acres leased through four leases (note that not all land was owned or leased at the same time and the maximum size of CSLO was 14,959 acres). During World War II, the Camp was used by the U.S. Army from 1943 to 1946 for infantry division training. Uses of the Camp included artillery, small arms ranges, mortar, rocket and grenade ranges separated into 13 different training areas and 27 ranges (USACE, 2018b). After the Second World War, a small portion of the former Camp was returned to its former private owners. All the land of the Camp did not get transferred back before the Korean Conflict arose, and the Camp was reactivated. The U.S. Army again used the Camp from 1951 through 1953 where the Southwest Signal Center was established for the purpose of signal corps training. The Camp consisted of 18 ranges and 16 training areas during the Korean War. Following the Korean War, the Camp was maintained in inactive status until it was relinquished by the Army in the 1960s and 1970s. Approximately 4,685 acres was relinquished to the General Services Administration (GSA) in 1965. GSA then transferred the property to other agencies and individuals beginning in the late-1960s through the 1980s; most of which was transferred for educational purposes (e.g., Cal Poly and Cuesta College). A large portion of CSLO (approximately 5,880 acres) has been retained by the California National Guard. The original MMRP Project 5 (Multi-Use Range Complex MRS) was revised in accordance with the USACE Handbook on Realignment, Delineation and MRS Prioritization Protocol Implementation dated 1 October 2011; the information in the final SI report dated 27 September 2007; and the MMRP Project Realignment and Delineation Form dated 15 July 2013. As a result of the realignment, Project 9 was added to address the Rifle Grenade Range (1952) and MRS 09 was created. Many of original structures at MRS 09 are no longer present at the site other than the current shooting range structure at CDFW.

The Formerly Used Defense Sites (FUDS) Program cleans up environmental contamination at properties formerly owned, leased, possessed, or used by the military services (Army, Navy, Air Force, or other Defense agencies). The Army is the Department of Defense executive agent for FUDS, and the U.S. Army Corps of Engineers is responsible for carrying out the program. The Department of Defense is responsible for cleaning up DoD-generated contamination on FUDS properties. The Army oversees the program for DoD and the U.S. Army Corps of Engineers manages the cleanup at these properties. Actual cleanup is accomplished by Corps geographic districts and performed in consultation with the U.S. Environmental Protection Agency and state environmental and health offices.

Several previous investigations have been completed at the CSLO MRS 09 including an SI, which was completed in September 2007 (See Figure D). Activities conducted during the SI included approximately 1 linear mile of qualitative reconnaissance. The qualitative reconnaissance of the site surface to identify indicators of suspect areas, including earthen berms, distressed vegetation, stained soil, ground scars or craters, target remnants, and visible metallic debris. One MEC item (2.36-inch rocket warhead) and MD from 3.5-inch intact [inert] practice rockets were observed during the SI.

PROJECT ACTIVITIES:

Project Purpose Summary:

> The purpose of this project is to investigate, identify and/or treat any former military munitions that may be still present at the CSLO Munitions Response Site (MRS) 09. Military munitions (bombs, rockets, etc.) or unexploded ordnances (UXO) were historically used at CSLO and they may potentially be present in various

soil media and depths at the Site. However, the nature and extent of their presence has not been fully characterized; therefore, they may pose an unacceptable hazard to present and future land users. It is likely that Munitions and Explosive of Concern (MEC) may be encountered during this project. MEC has been discovered in the MRS area during previous investigations (See Figure D). It is anticipated that the MEC item presenting the greatest fragmentation distance is from the 3.5 in rocket projectile. The Site currently contains limited MEC that may be active and could potentially detonate if encountered by the public.

Scope of Work Summary:

The proposed activities listed below are intended to reduce the number of potential unexploded ordnance items within the study area.

1. Investigation (by foot) and excavation with hand tools of individually identified subsurface MEC/anomalies;
2. Treatment of collected items, which may include MEC open detonation; and
3. Transportation of equipment on existing roads.

Geophysical Surveys: Geophysical surveys will be conducted on generally parallel transects with site-specific orientation with transect spacing determined based on range type and munitions by two-or three-person field teams using man-portable carts. A UXO escort will accompany the geophysical field teams to guide them away from potential MEC hazards. If natural/cultural monitors have not accomplished surveys during the surface visual surveys, monitors will also accompany the team to ensure environmentally sensitive locations are protected. Transect path and spacing will be dependent on Right of Entry (ROE) parcel access, terrain, and vegetation cover. Transect paths will deviate from the planned transect paths to avoid hazards and obstacles. Geophysical surveys surface/subsurface scans utilize various non-destructive/non-invasive technologies (electromagnetic, radar, etc.) to locate and determine various surface/sub surface UXO and do not involve any vegetation clearance as part of the surveys. This is accomplished by carrying the geophysical survey equipment on a cart with wheel or in a handled gurney configuration across the ground while following a pre-determined GPS path or transect. The geophysical survey equipment is high sensitivity, high resolution, type of metal detector suitable for the detection of both ferrous and non-ferrous metals at various depths.

Summary of Sampling Approach:

In summary, if one or more potential MC source areas are identified the following soil samples will be collected. Samples will be collected using disposable plastic scoops from 0 to 6 inches bgs (0 to 2 inches bgs for post-detonation) and will be collected in resealable plastic bags in accordance with Bristol's SOP BSC-05.

1. If the area of a DU is less than approximately 2.25 acres, or buildings/infrastructure limit accessible and appropriate sampling areas within a DU to such a size or smaller, then collect three replicate 50-increment soil samples from a depth of 0 to 6 inches over an area of 0.75 acres.

2. If the sampling-accessible area of a DU is greater than approximately 2.25 acres, then collect the fewer of 1) eight 50-increment soil samples from a depth of 0 to 6 inches over an area of 0.75 acres at SUs situated at random from within the DU, and 2) the number of such SUs that can be fit within the accessible area of the DU. Collect no field replicates.

3. If a detonation activity is performed, then collect three 50-increment soil sample replicates from SU1 and SU2 as described in Section 17.14.3.

4. For QC, instruct the laboratory to conduct triplicate analyses on 10% of the samples submitted for analysis.

Incremental sampling (IS) is a prescribed sampling and sample processing methodology for obtaining soil samples that are representative of a defined volume of soil (referred to as a decision unit [DU]). The IS methodology is designed to minimize sampling error and data variability in order to provide statistically sound, unbiased estimates of the mean concentration of a contaminant for the DU. Performed properly, IS may result in more consistent and reproducible analytical results than discrete soil sampling procedures.

An incremental sample consists of multiple increments collected from throughout a DU or from within a smaller area (or areas) within a DU defined as a sampling unit (SU) and thus may be considered a type of "composite

sample." All incremental samples will consist of 50 increments weighing a minimum of 1 kilogram per sample. However, it differs significantly from traditional composite samples in a number of ways; for example, a single incremental sample consists of a large number of increments of equal mass collected from an entire DU or SU in an unbiased manner. This sampling method results in a larger total sample mass to overcome effects of compositional heterogeneity. In addition, laboratory processing procedures (including air drying of the entire sample, reduction of particle size, and incremental subsampling) distinguish incremental samples from conventional composite samples.

Incremental surface soil sampling for explosives is proposed to characterize MC concentrations. Data from RI intrusive investigations and geophysical transects will be used to calculate potential MEC/MD densities across the investigation area. As described in Worksheet #11 (DQOs), MC sampling is proposed for the presumed central impact area and also areas of elevated and relatively homogeneous MEC/MD density, if any (and areas encompassing post-BIP or post-consolidated demolition actions). The spatial boundaries of these areas of higher MEC/MD density will be defined from the density maps using VSP software and reviewed with project stakeholders for concurrence as the appropriate DUs prior to soil sampling. The size of a DU related to assessing human health or ecological risk is typically determined by the smallest exposure area of potential concern. In addition to risk evaluation, USACE also discusses use of incremental sampling to evaluate the dimensions of known or suspected release areas, and for sampling very large areas.

Identification/Disposal: If an excavated geophysical target is considered to be MEC, it will be uncovered sufficiently to obtain a positive identification of the item. MEC will be excavated with hand tools, using care to remove the overburden and subsequently replaced after survey work is completed. Excavating anomalies by hand would generate less dust than that caused by the current recreational activities and vehicular traffic around the project area. Very small amounts of fugitive dust would be generated due to excavating ordnance. MEC survey, identification and blow in place (BIP) will be localized, take place on the surface, and have no impact on landslides. If the item is identified as MEC, a determination will subsequently be made as to whether it is acceptable to move. A determination on moving and disposal of MEC will be made by the Senior Unexploded Ordnance Supervisor (SUXOS) and Unexploded Ordnance Safety Officer (UXOSO) for each occurrence. The on-site USACE OESA will be notified of the decision prior to movement for each occurrence. It may be decided that individual MEC items should be relocated for disposal to achieve an adequate safe separation distance.

Any suspected or known MEC encountered during excavation will be clearly marked with flagging tape and its position noted on the dig sheet and other appropriate site maps. The UXO Team Leader (UXO III) will evaluate the item found and report its condition to the SUXOS and UXOSO. No MEC will be moved without positive identification of the item and evaluation of its condition. No MEC identified for destruction will be removed from its location without concurrence between the SUXOS and UXOSO that the item may be moved.

As unexploded ordnances (UXO) items are found during the investigation, they will need to be treated. In most situations, open detonation (OD) remains the safest and most frequently used method for treating UXO. When open detonation takes place where UXO is found, it is called BIP. Risk of upset to surrounding environment will be minimized through proper handling of BIP. In munitions response, demolition is almost always conducted on-site, most frequently in the place it is found, because of the inherent safety concerns and the regulatory restrictions on transporting even disarmed explosive materials. BIP detonation is accomplished by placing and detonating a donor explosive charge next to the munition which causes a sympathetic detonation of the munition to be disposed of.

The project teams will coordinate with local agencies and government to ensure that project activities do not inconvenience public services and their ability to provide services to the community. MEC detonations and intrusive investigations could cause temporary ground/surface soil disturbances. Although temporary disturbances due to intrusive investigation and intentional detonations may occur, excavations would be made with hand tools and would be limited in number and size.

As a project control, activities would include avoidance of sensitive species and restoration activities would include replacement of topsoil with original vegetation to the extent allowed by terrain. Long term impacts would not occur. Therefore, the project would not significantly impact the site aesthetics, and the overall site character would remain the same. The site is not located within a scenic vista.

Prior to conducting disposal operations, an exclusion zone (EZ) will be established, and all non-essential personnel will be evacuated from within the EZ. Prior to priming the disposal charges, all avenues of ingress will be physically blocked by guard personnel. Radio communications will always be maintained between all

parties involved with the Minimum Separation Distance (MSD) closure and disposal activities. Closure of the EZ will be maintained by all personnel until authorization from the SUXOS, signaling completion of disposal activities, has been received. Constant vigilance will be maintained by all personnel to detect any intrusion into the EZ or over flights of aircraft bearing towards the MSD. Upon completion of disposal activities, the disposal team leader and one UXO Technician will visually inspect each disposal shot. One of these personnel will perform the visual inspection while the other stands by at a safe distance prepared to render assistance in the event of an emergency. Upon completion of this inspection, and providing that there are no residual hazards, the SUXOS will authorize continuation of Site operations within the EZ, including post-BIP soil sampling if required.

BIP events will result in limited-short-term emissions. For fire suppression, areas adjacent to open detonation will be wetted in order to reduce the amount of dust created by any open detonation activities. Engineering controls, such as sandbags will be used where necessary to help minimize particle dispersion and the generation of dust created by open detonations. Open detonation of MEC/UXO items would also generate small quantities of dust. Both activities would involve a very confined area and occur for only a short period of time. No long-term pollution would be caused by the proposed activities. The gaseous products formed by the explosion are normal constituents of the atmosphere and are readily dispersed. No measurable effect on air quality would result from the explosive destruction of ordnance within the project area using either open detonation or detonation within a consolidation point. Therefore, the project-related impacts to air quality would be short-term and insignificant. Post survey, MEC excavation or post BIP soil removal activities will be replaced and backfilled with hand tools using existing overburden from initial excavation upon completion of activities.

Environmental Species Impact Summary:

The state of California supports 308 federally listed threatened and endangered (T&E) species; two of which are present on or in proximity to the Site. The federally listed species known to occur on or near Site include the California red-legged frog (*Rana draytonii*), and the southern steelhead (Oncorhynchus mykiss) and are presented in RI/FS. Chorro Creek and San Luisito Creek near the vicinity of the MRS (though not within) are NOAA fisheries designated as a Critical Habitat for steelhead trout (*Oncorhynchus mykiss*) (federally threatened species). No RI fieldwork will be done within these fisheries and none of the fieldwork conducted within the project areas will impact these fisheries.

Geophysical Surveys utilizing noninvasive scanning technology tools (magnetic induction, Ground Penetrating Radar, etc.) will be performed on foot and not near streams. No parking will occur near streams. No fill materials will be discharged into streams. Care will be taken to avoid all special status species including federally and state-listed, as well as SSCs, state candidate species, state fully protected, and state watch list species identified during field activities. The field team will also ensure that sampling activities do not disturb any of the California rare plant species that may occur at the site. In the event the results of the biological survey indicate the presence of federal- or state-listed species or habitat that may require a modified SU size, the approach to conducting the MC and post-detonation sampling will be evaluated and any necessary changes will be documented in a Field Change Request.

Aquatic ecological threatened or endangered species include vernal pool fairy shrimp and vernal pool tadpole shrimp that may occur in ephemeral vernal pools that form in response to precipitation and runoff (see Section 10.14). If a decision unit (DU) as described above is defined that encompasses an ephemeral stream and/or a vernal pool, the field team will attempt to avoid placing incremental soil samples in the stream or pool (regardless of the presence of water) in order to protect the habitat. Sediments in these areas may have finer grain size and/or a higher proportion of organic material than terrestrial soil, which could result in naturally elevated concentrations of metals and bias the results of soil background comparisons. If a DU is defined that encompasses one or more vernal pools, the results of the soil background comparisons and ecological screening assessment for the DU will be employed to determine whether sediment sampling in vernal pools is necessary. Sediment sampling will not be performed unless (chemicals of primary concern) COPC concentrations in terrestrial soils in the DU encompassing the vernal pool is indicative of potential ecological risks. The premise is that the potential for impacts in the terrestrial area encompassing a pool is indicative of a potential for contribution of site related COPCs to pool sediments. Because the objective of ecological risk assessment for threatened or endangered species is protection of individual organisms, each individual vernal pool will be considered a DU. An MC sampling plan for vernal pool sediments appropriate to the size and condition (dry, moist or submerged) of a pool will be developed only in the event such sampling is required.

Vegetation Impact Summary:

Vegetation removal (trees and/or shrubs) will not be performed on the Site. Minimal vegetation impacts will occur if a contact or anomaly is located below ground surface at the base of a tree or shrub. Field crews will remove as little soil as necessary to access the contact while working around any vegetation. Vegetation will not be removed to allow transects to pass through the area. If a large amount of vegetation is encountered while performing a transect, the field crew will go around the vegetation, and the location of the vegetation will be noted in the field log and transect log. The crew will continue the transect once they have passed around the vegetation. The limited project activities combined with the project controls will not conflict with local policies.

The amount of soil being excavated would be minimal and the subsurface MEC/anomalies would be removed and safely detonated. Although temporary disturbances due to intrusive investigation and intentional detonations may occur, excavations would be made with hand tools and would be limited in number and size. As a project control, activities would include avoidance of sensitive species and restoration activities would include replacement of topsoil with original vegetation to the extent allowed by terrain. Long term impacts would not occur. There would be no risk of substantial adverse effects.

Historical and Cultural Survey Summary:

Based on information gathered from the California Historical Resources Information System (CHRIS) in November 2019, 19 cultural resource investigations have previously been conducted within 1 mile of the Area of Potential Effect (APE) for MRS 09. Two of the 19 previously conducted cultural resource studies intersect a portion of the APE. The CHRIS record search identified 20 previously recorded cultural resources within 1 mile of the APE for CSLO MRS 09. The resources identified include numerous prehistoric and historic sites such as bedrock mortar (a circular depression in a rock outcrop or naturally occurring slab, used by people in the past for grinding of grain, acorns or other food products) sites and historic scatter (a layer or scatter of artifacts deposited on the ground's surface). None of these resources intersects the CSLO MRS 09 APE; however, one resource is directly adjacent to the APE.

Prior to fieldwork, qualified project archaeologists will conduct surveys within the investigation area for CSLO MRS 09 and confirm previously recorded site locations and record any new sites identified. Survey methods are described in the Cultural Resources Survey Work Plan. The results of the surveys will be summarized in a Cultural Resources Survey/Inventory Report following the surveys and will include recommendations for monitoring, if needed. In addition, prior to initiating any field activities, cultural resources training will be provided to all project personnel by the project archaeologist

In addition, the project biological and cultural resources coordinator will be on-site the first week of field operations to provide identification and avoidance training to the project team. Non-intrusive methods will be used during the project. Non-intrusive methods, such as visual surveys have a low potential for impacting cultural resources depending on what type of equipment is used to conduct the survey. Intrusive methods have the potential to impact a cultural resource if the dig area is within proximity of a cultural resource. Every effort will be made to avoid resources identified within the project area.

During the fieldwork, if features or artifacts of interest are encountered, the team will go around the features or artifact and not disturb it. For all cultural features or artifacts that are found, the location of each item will be recorded with a GPS point, a photo will be taken, and a brief description of the item will be recorded. This information will be provided to the USACE PM and USACE Archaeologist at the end of the field day, or earlier if appropriate

Every effort will be made to identify cultural resources within the project area and to avoid them during surveys or UXO (BIP) activities. During transect scanning and based on input from onsite geologist/cultural expert, transect scanning will be adjusted to divert personnel/instrument paths to avoid known or potential cultural resources. In situations involving identification of cultural resources in proximity of blow in place activities or excavation, a stop work notice will take place. An escalation of notification will take place starting with Project Managers on both the State and Army Corp will be made. Input from respective cultural experts/owners, site safety personnel and Project Managers will take place and an acceptable path forward will be made to avoid damage of cultural artifacts. Examples of potential solutions could involve creating physical barriers such as sandbags barricades of an artifact near a blow in place activity, relocation of UXO to an alternative location of blow in place activities, temporary excavation of artifacts with input from appropriate State, Federal and Native American authorities and subsequent reburial after clearance.

If prehistoric or historical-period archaeological resources are encountered, the location will be noted in the field log and recorded using a GPS unit (if possible). If human remains are encountered during the project, then the project archaeologist will notify the County Coroner pursuant to Health and Safety Code section 7050.5. Also, if Native American human remains or any associated grave goods are found, as described in the Native American Graves Protection and Repatriation Act, Section 2(3), then work will cease in the area of the discovery, and the USACE and state archaeologists will be notified immediately as well as the Native American Heritage Commission. All human remains will be left in place until the appropriate action is defined.

Equipment Staging, Fencing and Munitions Staging Summary:

Storage areas and temporary facilities for logistic support will be located in off-site compounds that provide easy access to the project location. These sites will be used to store project equipment, such as all-terrain vehicles, temporary offices for personnel, and project management, dumpsters and roll-off bins for waste and UXO-related material, and a secured area for the project magazine if necessary. Majority of scanning equipment, excavation, sampling and hand tools will be hand carried into the field or dropped off in proximity to job site on existing roads.

Temporary fencing, erosion control, and other site-specific controls may be necessary if the project base is not within an existing secured compound.

Munitions debris (MD) that is collected during the day will be staged at a single location at the Site for removal at the end of the day. The collection point will be near an established access route (such as a dirt road or paved road that provides enough area for a vehicle to turn around). Upon completion of the day's activities, the MD shall be removed from the Site and transported to the off-site bin or container designated for MD.

Vehicle fueling and maintenance of project vehicles will be conducted off-site at paved and contained areas. If a severe leak of fuel or other vehicle fluids occurs, the following procedures will be employed:

- Berm the fuel spill site with dirt so that the fuel or fluid does not spread;
- Apply oil-absorbing material to the spill (each vehicle will be equipped with a spill kit);
- Report the spill to the SUXOS immediately; and
- Remove the contaminated soil and dispose in an approved landfill.

Water Quality Impact Summary:

There are no project activities that could affect water quality or discharge waste to water; consequently, no impacts will result. Soil samples will be collected before and after any BIP actions. Post detonation sampling and analysis will be performed if demolition of UXO by detonation is conducted. Based on the size of the munitions requiring BIP actions, the size of the decision unit may change, and sampling protocol will be up to the discretion of the sampling team. Historically post BIP samples have shown MC levels are below screening levels and they are not presumed to violate any water quality standards or waste discharge requirements. Runoff water will not be created by the project, nor will the project contribute substantial sources of polluted runoff.

Construction Impact Summary:

There is no construction associated with this project. No housing will be placed. The project will not have the potential to degrade water quality because runoff or other water impacts will not be created. Historically post BIP samples have shown MC levels are below screening levels and they are not presumed to violate any water quality standards or waste discharge requirements.

Local Resource Coordination and Impact Summary:

The project is being conducted under supervision of the local emergency responders including the San Luis Obispo Sheriff's Department, Cal Fire and California Poly Technical Institute Emergency Response. Emergency response plans or emergency evacuation plans will not be impaired. All excavation will be done with hand tools and will not cause significant fire risk. Blow-in-Place (BIP) events will result in limited fire risk. The fire department will be notified a minimum of 24 hours prior to any scheduled demolition operation. During dry conditions (as determined by the fire department) demolition operations will be conducted in the morning hours prior to 10:00 am and the disposal site area may require wetting to help mitigate fire potential. Sandbag mitigation with a water tamp may also be opted for as a means of fire mitigation. The limited scope of the project and extensive coordination efforts with local

emergency services will assure that public services are not affected. The following notifications will be made a minimum of 24-hours prior to conducting any demolition activity: on-site USACE OESS, local fire department, local police, and stakeholders located in or adjacent to, the MRS where the demolition activity will occur. The fire department will be alerted to stand by during demolition operations. In the event of a fire, site personnel will not attempt to extinguish the fire. Site personnel will immediately evacuate the site to beyond the MSD and notify appropriate stakeholders.

Noise Impact Summary:

The noise generated by the field crews and their equipment could disrupt wildlife at the Site. Intrusive activities have a small, temporary, localized impact at the Site of the anomaly investigation. Although the disruption should only be temporary, minor disturbances may occur to wildlife foraging and cover requirements during BIP events and other field crew activities. Detonations from BIP events will produce brief excessive noise levels. An exclusion zone (EZ) consistent with Federal standards will be established during detonations, and there will be no exposures to residences to excessive noise levels.

Fire Prevention Summary:

The site consists mainly of rolling hills and grasslands. CSLO MRS 09 consists of terrain sloping from south to north, with elevation ranging from 160 to 200 feet (ft.) above sea level, including a large hill in the middle of the MRS (See Figure E). The project is being conducted under supervision of the local emergency responders including the San Luis Obispo Sheriff's Department, Cal Fire and California Poly Technical Institute Emergency Response. Emergency response plans or emergency evacuation plans will not be impaired. All excavation will be done with hand tools and will not cause significant fire risk. Blow-in-Place (BIP) events will result in limited fire risk. The fire department will be notified a minimum of 24 hours prior to any scheduled demolition operation. During dry conditions (as determined by the fire department) demolition operations will be conducted in the morning hours prior to 10:00 am and the disposal site area may require wetting to help mitigate fire potential. Sandbag mitigation with a water tamp may also be opted for as a means of fire mitigation. The limited scope of the project and extensive coordination efforts with local emergency services will assure that public services are not affected. The following notifications will be made a minimum of 24-hours prior to conducting any demolition activity: on-site USACE OESS, local fire department, local police, and stakeholders located in or adjacent to, the MRS where the demolition activity will occur. The fire department will be alerted to stand by during demolition operations. In the event of a fire site personnel will not attempt to extinguish the fire. Site personnel will immediately evacuate the site to beyond the MSD and notify appropriate stakeholders.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED: (e.g., State Agencies, Counties, Cities, or Air Quality Districts, granting permits, financing approval, or participation agreement).

The only permits required are Rights of Entry for private parcel access by the U.S. Army Corp

NATIVE AMERICAN CONSULTATION: Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Note: Please see the Tribal Cultural Resources Section (Section 18) for additional information.

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FIGURE A: MRS 09 LOCATION

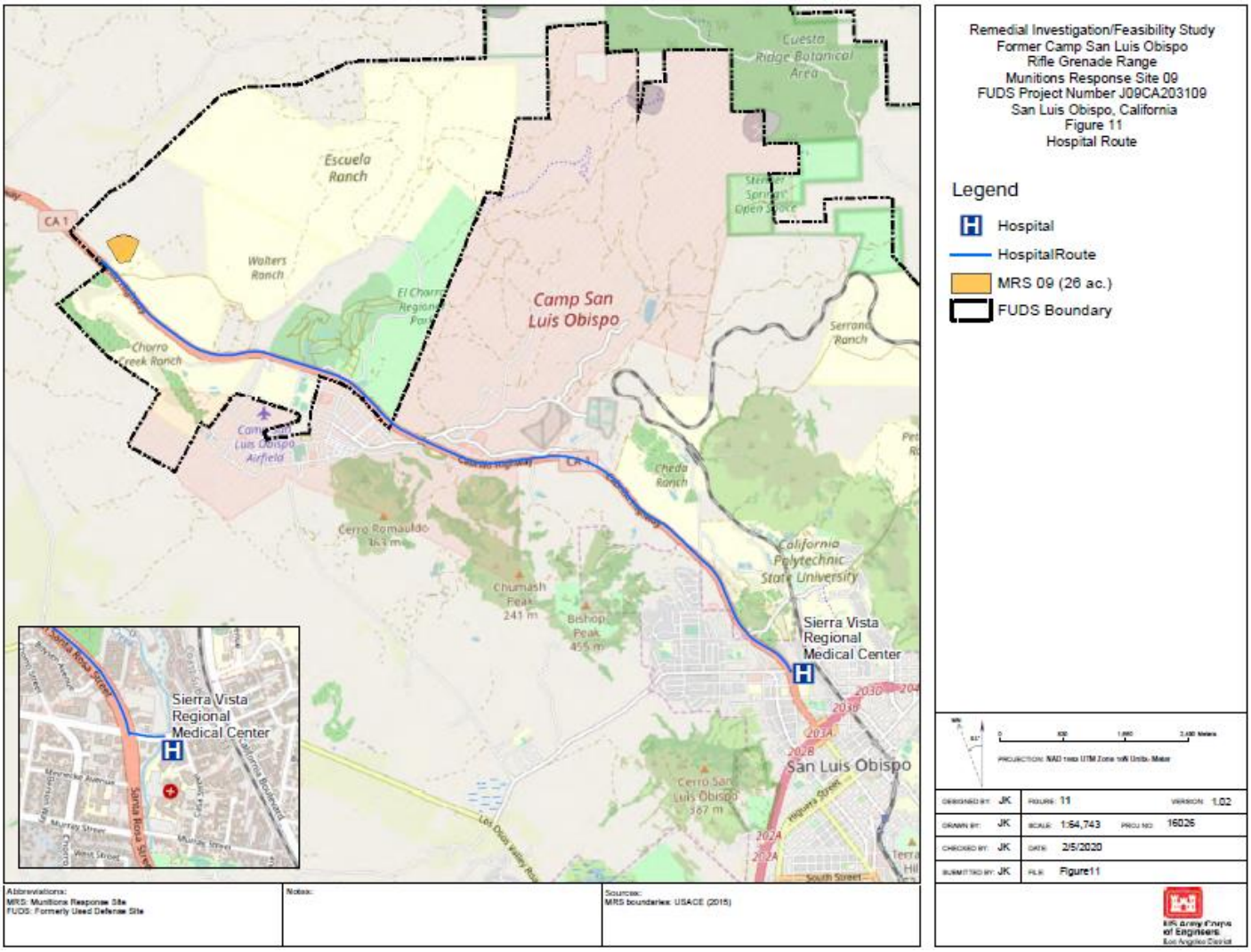


FIGURE B: MRS 09 LAND USAGE

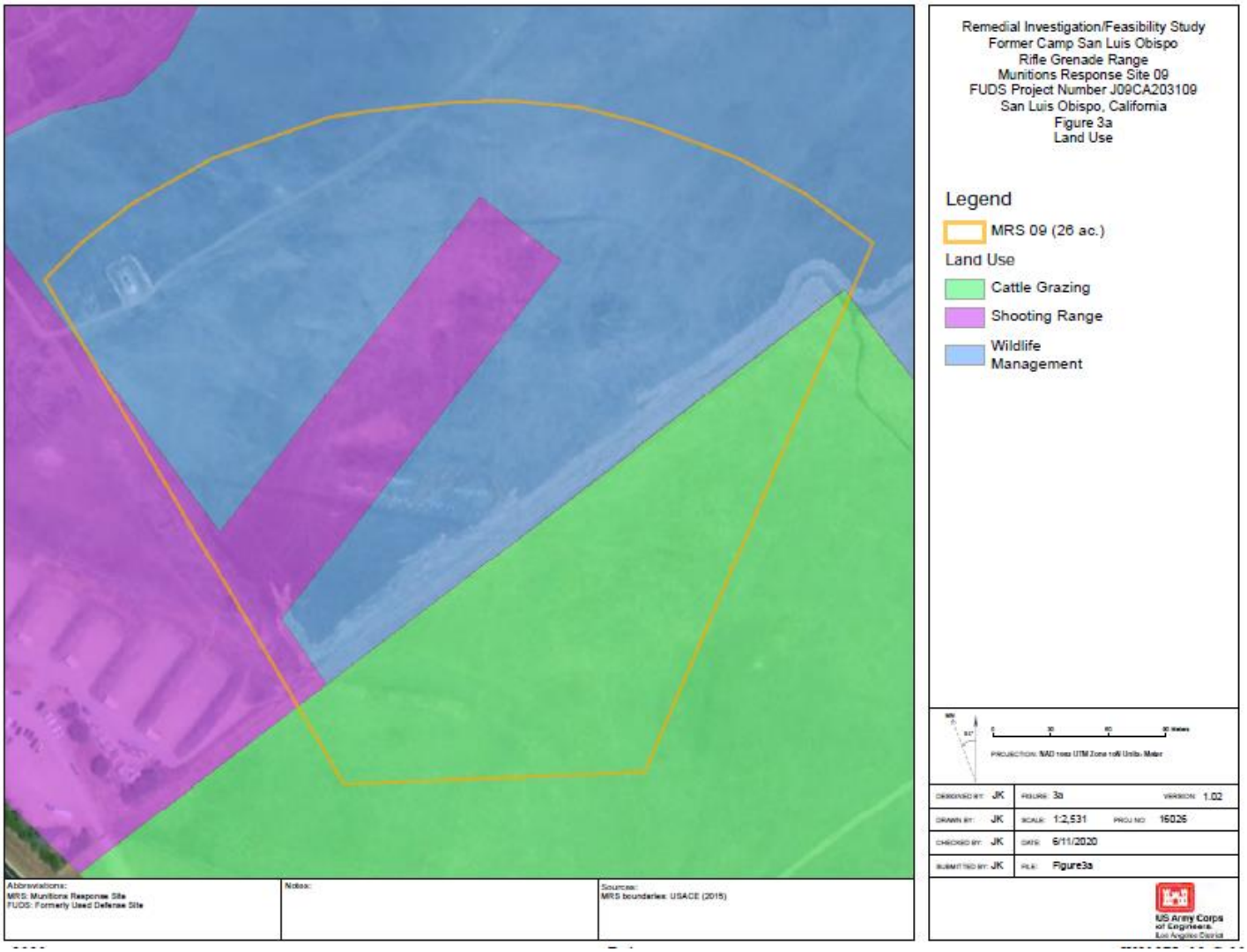


FIGURE C: LAND OWNERSHIP

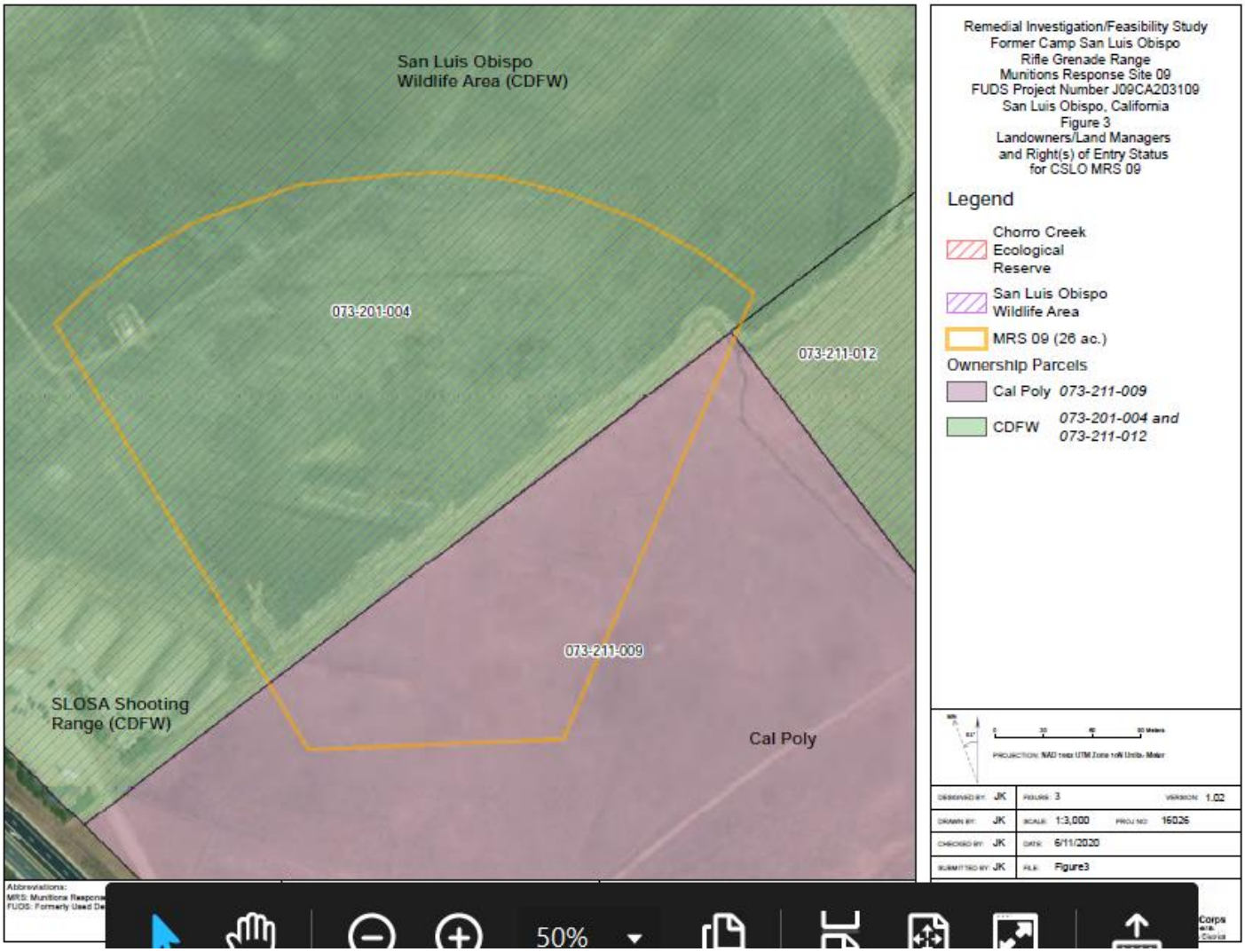


FIGURE D: PREVIOUS INVESTIGATIONS

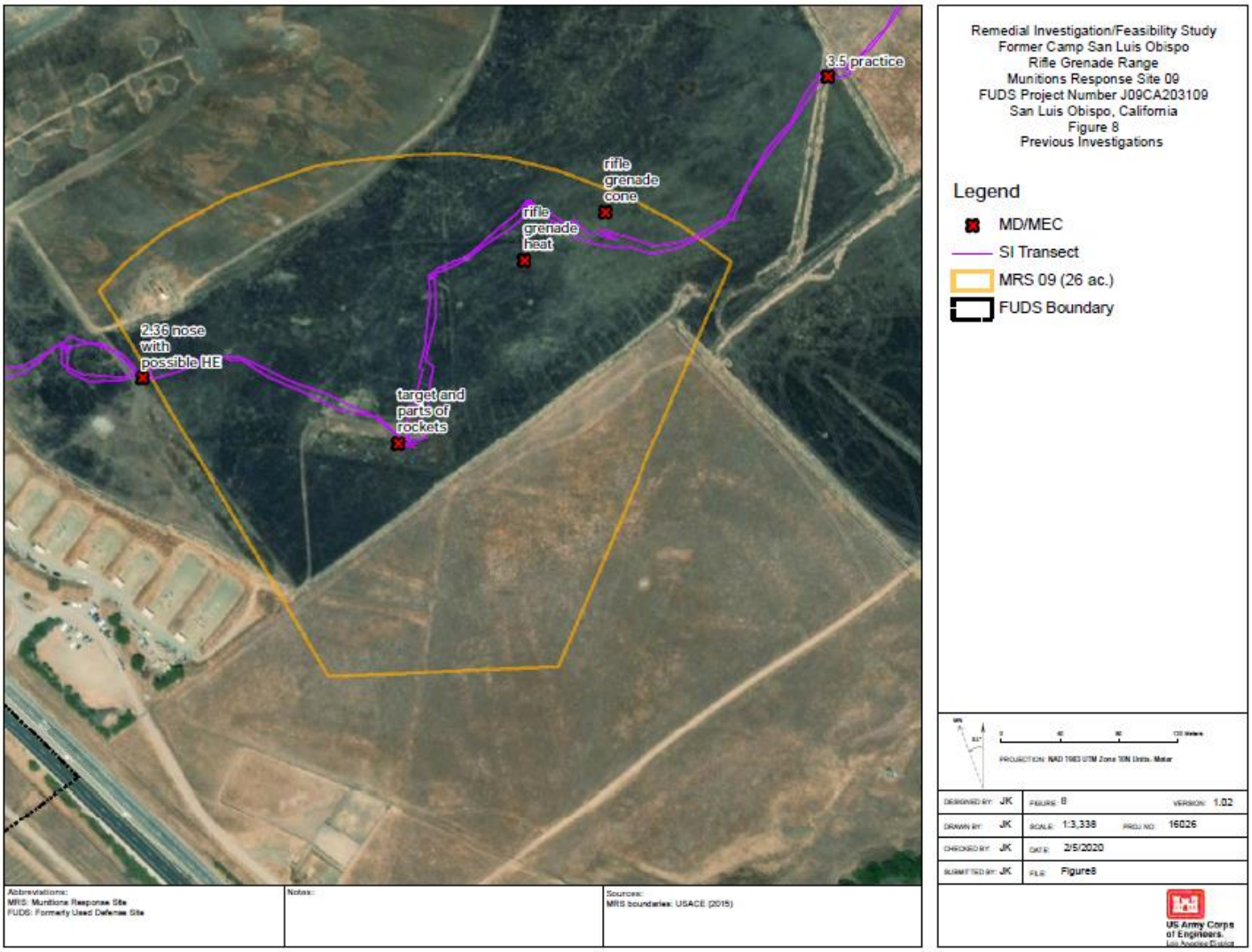


FIGURE E: TOPOGRAPHY

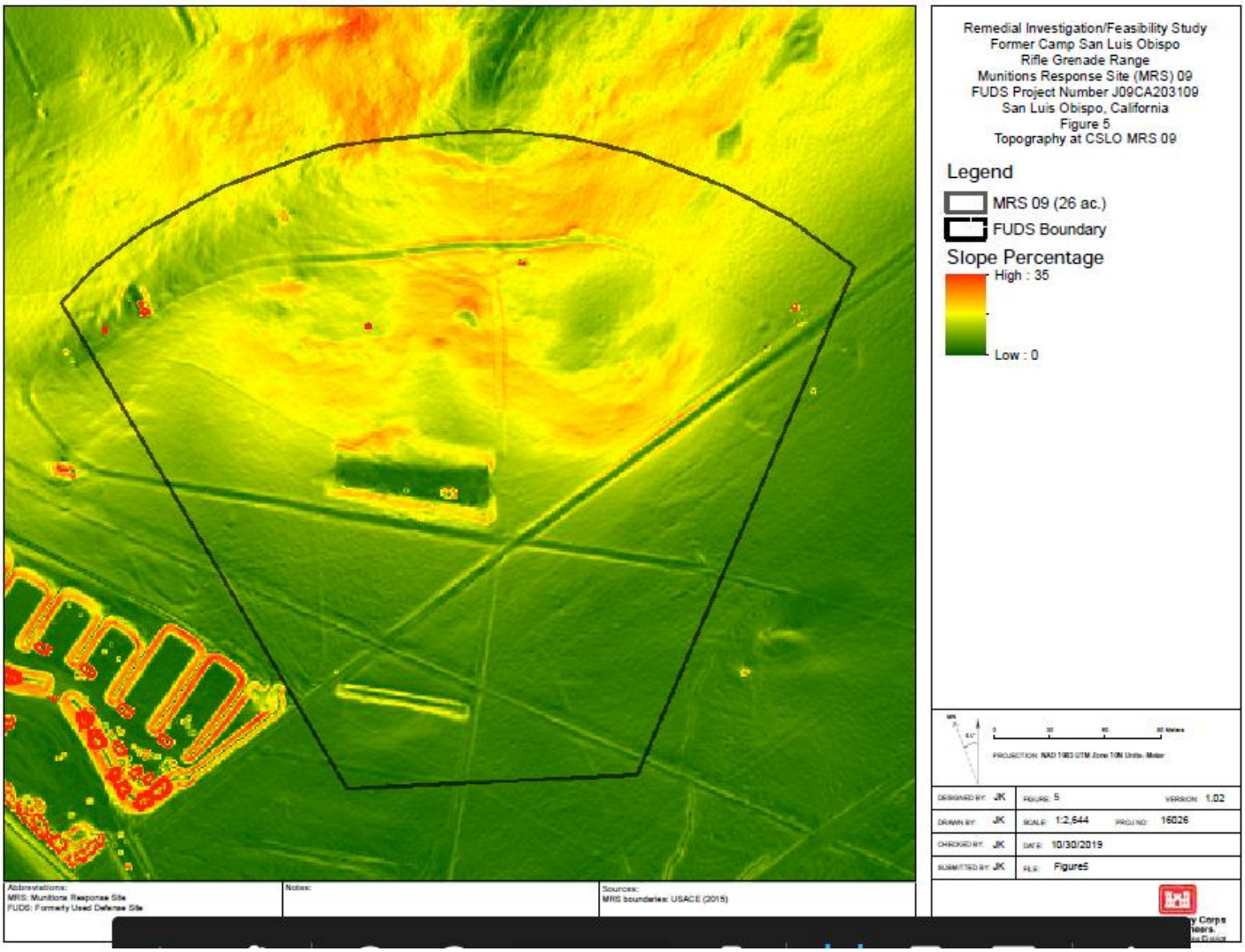
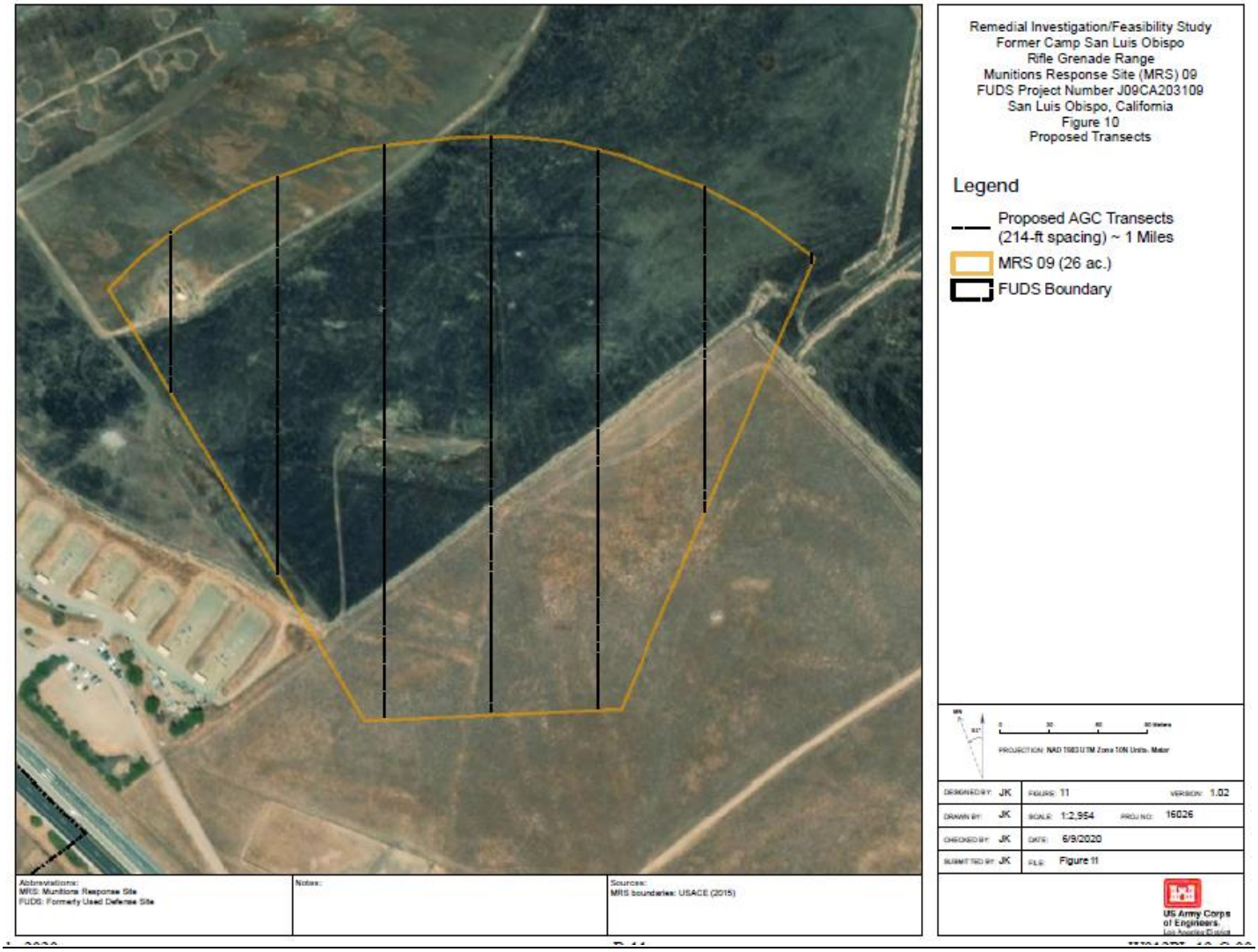

Remedial Investigation/Feasibility Study
Former Camp San Luis Obispo
Rifle Grenade Range
Munitions Response Site (MRS) 09
FUDS Project Number J09CA203109
San Luis Obispo, California
Figure 5
Topography at CSLO MRS 09
Legend
MRS 09 (26 ac.)
FUDS Boundary
Slope Percentage
High : 35
Low : 0
PROJECTION: NAD 1983 UTM Zone 10N Units: Meter
DESIGNED BY: JK
FIGURE: 5
VERSION: 1.02
DRAWN BY: JK
SCALE: 1:2,644
PROJ NO: 16026
CHECKED BY: JK
DATE: 10/30/2019
SUBMITTED BY: JK
FILE: Figure5
Abbreviations:
MRS: Munitions Response Site
FUDS: Formerly Used Defense Site
Notes:
Sources:
MRS boundaries: USACE (2015)

FIGURE F: TRANSECT SPACING



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist beginning on page 6. Please see the checklist beginning on page 6 for additional information.

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

DETERMINATION

On the basis of this initial evaluation:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that 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.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that 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.
☐	I find that 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.

CERTIFICATION

I hereby certify that the statements furnished above and in the attached documentation, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

DocuSigned by:
Jim Adams
1EA4C227769F479...

Preparer's Signature

7/8/2021

Date

Jim Adams	Hazardous Substances Engineer	916-255-3464
Preparer's Name	Preparer's Title	Phone #

Dominique Forrester

Digitally signed by Dominique Forrester
Date: 2021.07.08 12:54:48 -07'00'

Branch or Unit Chief Signature | Date

Dominique Forrester	Federal Facilities Unit Chief	916-255-3613
Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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 a 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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California Scenic Highway Program
The Scenic Highway Program allows county and city governments to apply to the California Department of Transportation (Caltrans) to establish a scenic corridor protection program which was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

ENVIRONMENTAL SETTING (BASELINE):

CSLO MRS 09 consists of mainly rolling hills and grasslands sloping from south to north, with elevation ranging from 160 to 200 ft. above sea level, including a large hill in the middle of the MRS (See Figure E)

The MRS is located in San Luis Obispo County, California, approximately 5 miles northwest of U.S. Highway 101 between the cities of San Luis Obispo and Morro Bay (Figure 1). The Cabrillo Highway (Route 1) is approximately 0.23 miles to the southwest. Route 1 is designated as a Federal Byway; however, it is not a California Scenic Highway. The Site is not visible from Route 1 (See Figure A). CSLO MRS 09 comprises 26 acres . It is situated on two parcels of land (See Figure C). One parcel (19 acres of the MRS) is managed by the California Department of Fish and Wildlife and designated as the San Luis Obispo Wildlife Area. A portion of this parcel is also used as a public shooting range operated by the San Luis Obispo Sportsmen's Association for long range targets (i.e., no firing points are located within the MRS; only target stands). The second parcel (7 acres of the MRS) is managed by California Polytechnic State University and is used for agricultural purposes including cattle grazing.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
The significance determination in this visual analysis is based on consideration of: (1) the extent of change related to visibility of the Proposed Project Site from key public vantage points; (2) the degree of visual contrast and compatibility in scale and character between project activities and the existing surroundings; (3) conformance of the proposed project with public policies regarding visual and urban design quality; and (4) potential adverse effects on scenic vistas and scenic resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
No project-specific environmental studies related to aesthetic resources were prepared for the proposed project. However, the methodology employed for assessing potential aesthetic impacts involved considering the existing viewshed and the project activities that have the potential to change the project-area visual character.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
- Investigation (by foot), by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation; and
- Transportation of equipment on existing roads.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista?

Impact Analysis:

The Site is not located within a scenic vista. MEC detonations and intrusive investigations could cause temporary ground/surface soil disturbances. Although temporary disturbances due to intrusive investigation and intentional detonations may occur, excavations would be made with hand tools and would be limited in number and size. As a project control, activities would include avoidance of sensitive species and restoration activities would include replacement of topsoil with original vegetation to the extent allowed by terrain. Long term impacts would not occur. Therefore, the project would not significantly impact the Site aesthetics, and the overall Site character would remain the same.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Trees, rock outcrops, and historical buildings will be avoided and left undisturbed. The 26-acre CSLO MRS 09 is located in San Luis Obispo County, California; approximately 8 miles east of the Pacific Ocean (at Morro Bay) and approximately 5 miles northwest of U.S. Highway 101 between the cities of San Luis Obispo and Morro Bay. The MRS is in the northwest corner of CSLO and directly east of Highway 1.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

There will be few excavations per acre. Each excavation will be made with hand tools and likely be less than a cubic yard. Excavations will be immediately backfilled after anomaly identification. The project is a surface investigation only and would not degrade the existing visual character or quality of the Site and its surroundings.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

There are no project aspects that would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Transportation Scenic Highways website (May 5, 2021):
https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

2. AGRICULTURE AND FORESTRY RESOURCES				
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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The site consists mainly of rolling hills and grasslands. CSLO MRS 09 consists of terrain sloping from south to north, with elevation ranging from 160 to 200 feet (ft.) above sea level, including a large hill in the middle of the MRS (See Figure E). One parcel (19 acres of the MRS) is owned by the CDFW and designated as the San Luis Obispo Wildlife Area. A portion of this parcel is also used as a public shooting range operated by the SLOSA for long range targets. The second parcel (7 acres of the MRS) is owned by Cal Poly and is used for agricultural purposes including cattle grazing (See Figure C). The property is not designated as unique or important farmland according to the Farmland Mapping and Monitoring Program (See Figure B). The project will not change the use or zoning for the property. Therefore, no further analysis of agricultural resources is deemed necessary.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
The list of agriculture or forestry resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the lack of agricultural or forestry resources in or near the Proposed Project Site, no environmental studies relating to agriculture or forestry resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
None.

Analysis as to whether or not project activities would:

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?

   Impact Analysis:

   No activities in the proposed project will impact or convert Farmland.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Less Than Significant With Mitigation Incorporated
   ☐ Less Than Significant Impact
   ☒ No Impact

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

   Impact Analysis:

   No activities in the proposed project will conflict with existing zoning or agriculture use, or Williamson Act contract.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Less Than Significant With Mitigation Incorporated
   ☐ Less Than Significant Impact
   ☒ No Impact

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))?

   Impact Analysis:

   The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes. Therefore, the zoning or rezoning, of forest land, or timberland zoned Timberland Production does not apply.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Less Than Significant With Mitigation Incorporated
   ☐ Less Than Significant Impact
   ☒ No Impact

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

Impact Analysis:

This is agricultural and recreational land. There will be no loss or conversion of forest land.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?

Impact Analysis:

The proposed project is an investigation of the Site and will not directly result in conversion of Farmland, to nonagricultural uses.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Conservation (May 5, 2021): https://maps.conservation.ca.gov/DLRP/CIFF/

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

County of San Luis Obispo website: https://www.slocounty.ca.gov/getattachment/97cc6931-3c7f-4d75-9588-4e3ba25c428d/Estero-Planning-Area-Land-Use-Map.aspx

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

3. AIR QUALITY				
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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal and State Ambient Air Quality Standards

The Clean Air Act of 1970 (42 USC 7401 et seq.) tasked the U.S. Environmental Protection Agency (EPA) with establishing national ambient air quality standards (NAAQS) and periodically reassessing whether these standards are adequate to protect public health and the national welfare, including those resources and values associated with national parks and wilderness areas. The NAAQS set thresholds for criteria pollutants, including ozone (O3), carbon monoxide (CO), nitrogen oxides (NOX), sulfur dioxide (SO2), suspended particulate matter (PM), and lead (Pb). Subsets of particulate matter have been identified for which permissible levels have been established since 1970 which include particulate matter of 10 microns in diameter or less (PM10) and particulate matter of 2.5 microns in diameter or less (PM2.5).

Under the 1988 California Clean Air Act, the California Air Resources Board has also adopted standards for these criteria pollutants (called California Ambient Air Quality Standards, or CAAQS) and applies additional standards for pollutants that are not currently included in the national standards. The federal and state ambient standards differ in some cases; in general, the California standards are more stringent, particularly for ozone and PM10.

State Implementation Plans

The state and federal Clean Air Acts require nonattainment air districts to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how the district would attain NAAQS. The 1990 amendments to the federal Clean Air Act set deadlines for attainment based on the severity of an area's air pollution problem. SIPs are not single documents but are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations, and federal controls. Many of California's SIPs rely on the same core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes the California Air Resources Board the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to the California Air Resources Board for review and approval.

California is divided geographically into air basins for the purpose of managing the air resources of the State on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. The State is currently divided into 15 air basins. CSLO MRS 09 is within the South Centra Coast Air Basin. The South Central Coast Basinwide Air Pollution Control Council (SCC/BCC) contains the San Luis Obispo County, Santa Barbara County, and Ventura County Air Pollution Control Districts.

San Luis Obispo County Air Pollution Control District (SLOAPCD) is currently designated as "nonattainment" for the state standards for ozone, partial nonattainment (in eastern San Luis Obispo County, outside of the project area) for federal ambient standards for ozone, and nonattainment for the state standards for particulate matter greater than 10 microns in diameter (PM10). The City's Conservation & Open Space Element (COSE) identifies goals and policies to achieve and maintain air quality that supports health and enjoyment for those who live, work, and visit the city. These goals and policies include meeting State and Federal air quality standards, reducing dependency on gasoline- or diesel-powered motor vehicles and to encourage walking, biking, and public transit use.

The SLOAPCD has developed a CEQA Air Quality Handbook (most recently updated with a November 2017 Clarification Memorandum) to evaluate project-specific impacts and determine if potentially significant impacts could result from a project. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan (2001) has been adopted by the SLOAPCD.
Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution (i.e., sensitive receptors): children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. The nearest sensitive receptors to the project site are the single-family residences located approximately 700 feet northeast of the project site.

ENVIRONMENTAL SETTING (BASELINE):

The weather at CSLO MRS 09 is generally mild and considered Mediterranean. Within the foothills to the north of the former camp, the winters are considered somewhat cooler and wetter, and the summers are warmer and drier. Average rainfall of 29 inches (generally occurs between November and March (San Luis Obispo County, 2013). As the clouds move inland from the coastline and rise over the mountains, rainfall totals can average from 30 to 45 inches along the ridgetops. The wind is generally from the west-southwest blowing to the north-northwest.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Air quality emissions would be limited to transport to the site and potential emissions related to demolition of UXO; consequently, there are no applicable construction thresholds. The list of air quality resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to air quality in or near the Proposed Project Site, no environmental studies relating to air quality resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
Excavation by hand of anomalies would generate less dust than that caused by the recreational activities and vehicular traffic around the project area. Very small amounts of fugitive dust would be generated due to excavating ordnance. Blow-in-Place (BIP) events will result in limited-short-term emissions. Open detonation of MEC/Unexploded Ordnance (UXO) items would also generate small quantities of dust. Both activities would involve a very confined area and occur for only a short period of time. No long-term pollution would be caused by the proposed activities. The gaseous products formed by the explosion are normal constituents of the atmosphere and are readily dispersed. No measurable effect on air quality would result from the explosive destruction of ordnance within the project area using either open detonation or detonation within a consolidation point. Therefore, the project-related impacts to air quality would be short-term and insignificant.

Analysis as to whether or not project activities would:

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

Impact Analysis:

In order to be considered consistent with the 2001 San Luis Obispo County Clean Air Plan (CAP), a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP. This project will not alter land use planning or transportation; consequently, impacts would be less than significant.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

b. Result in 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

Impact Analysis:

San Luis Obispo County is currently designated as non-attainment for ozone and PM10 under state ambient air quality standards. Excavation activities will not generate significant amounts of fugitive dust emissions (PM10 or PM2.5). Excavation will be done with hand tools. Blow-in-Place (BIP) events will result in limited-short-term emissions. Emissions from open detonation will not result in a cumulatively considerable net increase in any criteria pollutant, including coarse dust particles (PM10). Emissions from any open detonation activities would not be controlled but would be relatively small due to the small size and number of individual munitions that may be found during the investigation. There will be a minimal number of employee vehicles traveling to the site that would not create a considerable net increase of any criteria pollutant.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

Excavation activities will not generate significant amounts of dust. Blow-in-Place (BIP) events will result in limited-short-term emissions. It is highly unlikely that substantial pollutant concentrations will be released during the RI/FS. The local population is very limited near the site. There are less than five houses within a mile of the site. The nearest preschool (Miss Josey's Playground) and educational center are approximately 1.5 miles away. The Bayside Care Center nursing home is more than 4 miles away. Sierra Vista Regional Medical Center and French Hospital are more than 6 miles away. Consequently; there will be no impact to sensitive receptors.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

There will likely be a very small number of items treated by detonation. The treatment of MEC items is not expected to create any objectionable odors. It is highly unlikely that substantial pollutant concentrations will be released during the RI/FS. The local population is very limited near the site. There are less than five houses within a mile of the site. The nearest preschool (Miss Josey's Playground) and educational center are approximately 1.5 miles away. The Bayside Care Center nursing home is more than 4 miles away. Sierra Vista Regional Medical Center and French Hospital are more than 6 miles away.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

Areas More Likely to Contain Naturally Occurring Asbestos:
https://ww2.arb.ca.gov/sites/default/files/classic//toxics/asbestos/ofr_2000-019.pdf

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

Air Pollution Control District, San Luis Obispo County: https://www.slocleanair.org/air-quality/air-forecasting-map.php

4. BIOLOGICAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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 Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☒	☐
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 Wildlife or U.S. 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?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal Endangered Species Act (ESA): (16 United States Code (USC) § 1531-1544, 50 Code of Federal Regulations (CFR) Part 17). The Federal ESA provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.

Federal Migratory Bird Treaty Act (MBTA): (16 USC § 703-712, 50 CFR Part 21). The MBTA makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid Federal permit.

California Endangered Species Act (CESA): (Fish and Game Code (FGC) chapter 1.5, sections 2050-2115.5, California Code of Regulations (CCR), title 14, chapter 6, § 783.0-787.9). CESA protects or preserves all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation.

CESA states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved.

Additionally, the California FGC § 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird; and § 3513 prohibits the take or possession of any migratory nongame bird or part there of as designated in the MBTA. Any birds in the orders Falconiformes or Strigiformes (birds of prey, such as hawks and owls) are protected under FGC 3503.5, which makes it unlawful to take, posses, or destroy their nest or eggs.

ENVIRONMENTAL SETTING (BASELINE):

The site consists mainly of rolling hills and grasslands with very few if any trees. The vegetation and trees in much of the MRS have undergone historical controlled burn activities to mitigate against uncontrolled fire hazards in the region. CSLO MRS 09 consists of terrain sloping from south to north, with elevation ranging from 160 to 200 feet (ft.) above sea level, including a large hill in the middle of the MRS (See Figure E). One parcel (19 acres of the MRS) is owned by the CDFW and designated as the San Luis Obispo Wildlife Area. A portion of this parcel is also used as a public shooting range operated by the SLOSA for long range targets. The second parcel (7 acres of the MRS) is owned by Cal Poly and is used for agricultural purposes including cattle grazing (See Figure C).

The state of California supports 308 federally listed threatened and endangered (T&E) species; two of which are present on or in proximity to the Site. The federally listed species known to occur on or near Site include the California red-legged frog (*Rana draytonii*), and the southern steelhead (Oncorhynchus mykiss) and are presented in RI/FS. Chorro Creek and San Luisito Creek near the vicinity of the MRS (though not within) are NOAA fisheries designated as a Critical Habitat for steelhead trout (*Oncorhynchus mykiss*) (federally threatened species). No RI fieldwork will be done within these fisheries or creeks.

Federal and state listed species (including species of concern) that are known to occur or have suitable habitat within the MRS were identified from the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) database and the CNDDB in October 2019. Table 10-1 from CSLO MRS09 RI/FS QAPP draft final lists federal and state protected species with the potential to occur or have suitable habitat within CSLO MRS 09.

Table 10-1 Federally Listed, State Listed, State Fully Protected Species and Species of Concern

Species	Scientific Name	Status	Preliminary Potential for Occurrence (2)
Amphibians			
California red-legged frog(1)	*Rana draytonii*	FT, SSC	Moderate
California tiger salamander	*Ambystoma californiense*	FT	Not Likely to Occur
Western spadefoot	*Spea hammondii*	SSC	Low
Birds			
Burrowing owl	*Athene cunicularia*	SSC	Moderate
California condor	*Gymnogyps californianus*	FE, SE, FP	Low (foraging only)
California horned lark	*Eremophila alpestris actia*	WL	High
Cooper's hawk	*Accipiter cooperii*	WL	High (foraging only)
Ferruginous hawk	*Bueto regalis*	WL	High (wintering only)
Golden eagle	*Aquila chrysaetos*	FP	Moderate (foraging only)
Grasshopper sparrow	*Ammodramus svannarum*	SSC	High

Species	Scientific Name	Status	Preliminary Potential for Occurrence [(2)]
Loggerhead shrike	*Lanius ludovicianus*	SSC	High
Prairie falcon	*Falco mexicanus*	WL	High (foraging only)
Tricolored blackbird	*Agelaius tricolor*	ST	High (foraging only)
White-tailed kite	*Elanus leucurus*	FP	High (foraging only)
Crustaceans			
California linderiella	*Linderiella occidentalis*	None	Low
Vernal pool fairy shrimp	*Branchinecta lynchi*	FT	Low
Snails			
Morro shoulderband snail	*Helminthoglypta walkeriana*	FE	Not Likely to Occur
Reptiles			
Blunt-nosed leopard lizard	*Gambelia silus*	FE	Not Likely to Occur
Coast horned lizard	*Phrynosoma blainvillii*	SSC	Moderate
Northern California legless lizard	*Anniella pulchra*	SSC	Moderate
Western pond turtle	*Emys marmorata*	SSC	Low
Flowering Plants			
Arroyo de la Cruz mariposa lily	*Calochortus clavatus var. recurvifolius*	CRPR 1B.2	Moderate
Blochman's dudleya	*Dudleya blochmaniae ssp. blochmaniae*	CRPR 1B.1	Moderate
Brewer's calandrinia	*Calandrinia breweri*	CRPR 4.2	Moderate
Cambria morning-glory	*Calystegia subacaulis ssp. episcopalis*	CRPR 4.2	Moderate
Chaparral ragwort	*Senecio aphanactis*	CRPR 2B.2	Moderate
Club-haired mariposa lily	*Calochortus clavatus var. clavatus*	CRPR 4.3	Moderate
Congdon's tarplant	*Centromadia parryi ssp. congdonii*	CRPR 1B.1	Moderate
Jones' layia	*Layia jonesii*	CRPR 1B.2	Low
Most beautiful jewelflower	*Streptanthus albidus ssp. peramoenus*	CRPR 1B.2	Moderate
Palmer's spineflower	*Chorizanthe palmeri*	CRPR 4.2	Low
Paniculate tarplant	*Deinandra paniculate*	CRPR 4.2	Low
San Luis Obispo County lupine	*Lupinus ludovicianus*	CRPR 1B.2	Low

Species	Scientific Name	Status	Preliminary Potential for Occurrence [2]
San Luis Obispo owl's clover	*Castilleja densiflora var. obispoensis*	CRPR 1B.2	High
Small-leaved lomatium	*Lomatium parvifolium*	CRPR 4.2	Moderate
Insects			
Crotch bumble bee	*Bombus crotchii*	State Candidate Endangered	Low
Obscure bumble bee	*Bombus caliginosus*	None	Low
Mammals			
American badger	*Taxidea taxus*	SSC	Low
Big free-tailed bat	*Nyctinomops macrotis*	SSC	Low (foraging only)
Pallid bat	*Antrozous pallidus*	SSC	Low (foraging only)
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC	High (foraging only)
Western mastiff bat	*Eumops perotis californicus*	SSC	Low (foraging only)
Giant kangaroo rat	*Dipodomys ingens*	FE	Not Likely to Occur
Morro Bay kangaroo rat	*Dipodomys heermanni morroensis*	FE	Not Likely to Occur
San Joaquin kit fox	*Vulpes macrotis mutica*	FE, ST	Not Likely to Occur

[1] Critical habitat present in MRS 09.

[2] Species with no state or federal status were included based on results from the CNDDB database search and/or California Rare Plan Rank (see Biological Resources Survey Work Plan [to be included in Appendix N of the Final UFP-QAPP] for more details.

FE = Federally Endangered; FP = Fully Protected (State); FT = Federally Threatened; SSC = State Species of Special Concern; SE = State Endangered; ST = State Threatened; WL = State Watch List.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
The list of biological resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Recent sensitive species surveys have not been conducted at the MRS**.**

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:
- Investigation, by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation or within a pit; and
- Transportation of equipment on existing roads.

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?

Impact Analysis:

Section 7 of the Endangered Species Act prohibits the take of listed species without an incidental take permit. Taking is defined as harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, collecting, or attempting to engage in any such conduct. Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavior patterns, including breeding, feeding, or sheltering. Under the terms of Section 7(b)(4) and 7(o)(2) of the Act, taking that is incidental to and not intended as part of the agency action is not considered to be prohibited taking under the Act, provided that such taking is in compliance with the incidental take statement. Because this project is being implemented under the Comprehensive Environmental Response Compensation and Liability Act, only the procedural requirements (i.e., identification of federally listed species, the recognition of project-related impacts to listed species, and the development of avoidance/minimization measures to those listed species) under Section 7 will need to be completed. Project controls included in the project RI/FS are designed to meet Section 7 procedural requirements. The CDFW laws have similar prohibitions against takes of state and federal species.

The RI/FS investigation footprint will be relatively small with respect to the total area of the MRS study area as described in Chapter 3 of the RI/FS. Coverage ranges from 0.75% to 7.5% of the total area for each MRS study area. Because the RI/FS field investigation will be performed using a transect-based approach these relatively small coverage percentages result in widely spaced transect spacing to achieve the desired investigation coverage. This limits the effect on sensitive species and habitat. Recent sensitive species surveys have not been conducted at the MRS. Consequently, the specific areas within the Site in which these species may occur have not yet been determined. However, the following procedures will be implemented for the project to ensure that impacts are less than significant.

General Protections
Biological monitors will be present for all project field activities. Daily and tailgate safety briefings will include reminders to watch for Endangered and Threatened species on roads. Personnel violating restrictions or exceeding project speed limits may be terminated from employment. In addition, the following provisions will be enforced during the project. Trash removal will also be performed taking care not to adversely affect the project area. Site restoration will be performed to restore disturbed areas as close as possible to their original contours, soil strata, and compaction.

Intrusive Activities
Discrete points requiring investigation will be located within the survey transects (See Figure F). Biological monitors will be present during all project field activities and survey each intrusive investigation location prior to excavation to determine whether sensitive species occur at or near the Site and advise the work crews on how to best avoid and prevent an effect on these resources. Monitors will ensure areas are free from any plant or animal species prior to UXO being detonated. If species are present, a qualified, permitted biologist will temporarily re-locate species pursuant to federal and state requirements. If species cannot be re-located, blast and/or fragmentation mitigation procedures will be implemented to reduce and/or eliminate the possibility of damage or injury to the species.

Special Status Listed Taxa Avoidance
Incorporated into the field activities will be avoidance of endangered and threatened and special status listed taxa. To avoid adverse effects to any listed threatened or endangered species, bird species protected under the Migratory Bird Treaty Act and wildlife habitat in general, no activity or action will be taken that may affect their population or habitat, and field teams will be trained on endangered local for a and fauna of CSLO. A qualified U.S. Army Corps of Engineers (USACE) biologist knowledgeable and experienced with plant and animal ecology will perform the necessary biological monitoring, observations, and reporting as described in RI/FS. Those procedures include the following:

- Pre-surveys for sensitive resources,
- Field worker education,
- Identification of flowering, breeding and nesting seasons,
- Part time monitor and qualified USACE biologist knowledgeable and experience with plant and animal ecology will perform the necessary biological monitoring, observations and reporting, and

- Resource avoidance through preserving and marking of possible hazards to individual species.

Listed and Sensitive Plant Species
During field operations, only areas necessary to conduct surface clearance investigations and MEC disposal will be disturbed. Equipment staging areas will be established when possible in already disturbed sites. A qualified USACE biologist knowledgeable and experienced with plant and animal ecology will perform the necessary biological monitoring, observations, and reporting listed above.

Bird Species
Field activities will avoid the flowering and nesting season for all bird taxa. Pre-project surveys will be conducted prior to and after the activities nesting season (March-September) in areas where transects may affect breeding species. All activity will be confined to after the spring and early summer flowering period. A qualified USACE biologist knowledgeable and experienced with plant and animal ecology will perform the necessary biological monitoring, observations, and reporting listed above.

Listed Plant and Animal Species
Field activities will avoid the nesting season for all bird taxa. Pre-project surveys will be conducted prior to and after the activities flowering and nesting season (March-September) in areas where transects may affect breeding species. All activity will be confined to after the spring and early summer flowering period. A qualified USACE biologist knowledgeable and experienced with plant and animal ecology will perform the necessary biological monitoring, observations and reporting listed above.

Additionally, project controls will be employed to control dust emissions. These controls include driving any motorized vehicle used on Site at a slow speed and digging only enough soil to uncover the contact or anomaly MEC. The survey crews will drive no faster than 15 miles per hour along the dirt roads leading to the Site and will not leave established roadways, thereby avoiding habitat areas. Wilderness designation will require the survey crews to leave the support vehicles outside the boundaries of the wilderness site and walk into the Site. All motorized equipment must be left outside the boundaries of these designated areas.

Avoidance for natural resources will be accomplished by two basic and interrelated methods: a) research and mapping will be the first methods used where natural resources are identified based on currently available information, and transects are planned accordingly; b) on-Site monitoring will be the second method (an ongoing method) and will include site-specific training and/or an on-site biologist, and transects will be modified accordingly. Right of Entry (ROE) access will also constrain the final acquired paths. Additional transects or grids may be used to help answer specific questions about MEC contamination and concentration in narrower target areas or where data gaps are identified the post-processed data.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

Surveys will be performed on foot and not near streams. No parking will occur near streams. No fill materials will be discharged into streams. Care will be taken to avoid all special status species including federally and state-listed, as well as SSCs, state candidate species, state fully protected, and state watch list species identified during field activities. The field team will also ensure that sampling activities do not disturb any of the California rare plant species that may occur at the site.

In the event the results of the biological survey indicate the presence of federal- or state-listed species or habitat that may require a modified SU size, the approach to conducting the MC and post-detonation sampling will be evaluated and any necessary changes will be documented in a Field Change Request.

Aquatic ecological threatened or endangered species include vernal pool fairy shrimp and vernal pool tadpole shrimp that may occur in ephemeral vernal pools that form in response to precipitation and runoff (see Section 10.14). If a DU as described above is defined that encompasses an ephemeral stream and/or a vernal pool, the field team will attempt to avoid placing incremental soil samples in the stream or pool (regardless of the presence of water) in order to protect the habitat. Sediments in these areas may have finer grain size and/or a higher proportion of organic material than terrestrial soil, which could result in naturally elevated concentrations of metals and bias the results of soil background comparisons. If a DU is defined that encompasses one or more vernal pools, the results of the soil background comparisons and ecological screening assessment for the DU will be employed to determine whether sediment sampling in vernal pools is necessary. Sediment sampling will not be performed unless COPC concentrations in terrestrial soils in the DU encompassing the vernal pool is indicative of potential ecological risks. The premise is that the potential for impacts in the terrestrial area encompassing a pool is indicative of a potential for contribution of site-related COPCs to pool sediments. Because the objective of ecological risk assessment for threatened or endangered species is protection of individual organisms, each individual vernal pool will be considered a DU. An MC sampling plan for vernal pool sediments appropriate to the size and condition (dry, moist or submerged) of a pool will be developed only in the event such sampling is required.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

Several areas within CSLO MRS 09 have been identified as being environmentally sensitive (vernal pools or other habitats that provide an environment for listed species). Based on known conditions and habitats within CSLO MRS 09, there is a potential that wetlands and ephemeral vernal pools may be present within them (Sections 10.3.2 and 10.3.5). If wetlands/vernal pools or observations/signs of listed species (including Species of Special Concern [SSC] or appropriate habitat) are identified by the project biologist within a transect, the transect may be moved for avoidance. Details on mitigation and avoidance measures will be included in the Biological Resources Letter Report following the biological reconnaissance surveys (to be included in Appendix N in the Final UFP-QAPP). Also see b) for vernal pools mitigation.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:
The investigation will be conducted over a short period of time in small areas of the Site and should have no significant effect on migration or nurseries. The project controls as described above in item a. will ensure that impacts to species are avoided or minimized. Noise impacts and personnel presence may result in temporary movement of some species from the area while project activities occur.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

Vegetation removal (trees and/or shrubs) will not be performed on the Site. Minimal vegetation impacts will occur if a contact or anomaly is located below ground surface at the base of a tree or shrub. Field crews will remove as little soil as necessary to access the contact while working around any vegetation. Vegetation will not be removed to allow transects to pass through the area. If a large amount of vegetation is encountered while performing a transect, the field crew will go around the vegetation, and the location of the vegetation will be noted in the field log and transect log. The crew will continue the transect once they have passed around the vegetation. The limited project activities combined with the project controls will not conflict with local policies.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

The project controls listed in item a. are protective of special status, endangered and threatened species. Consequently, no conflicts with local, regional or state plans would be expected.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

References Used:

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

California Department of Fish and Game, Natural Diversity Database reports for the San Luis Obispo quadrant, July 28, 2011.

5. CULTURAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

National Historic Preservation Act

Any project that is considered a federal undertaking is subject to compliance with Section 106 of National Historic Preservation Act (NHPA) (Section 106). Section 106 requires that, before beginning any undertaking, a federal agency must take into account the effects of the undertaking on *historic properties* and afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on these actions (16 U.S.C. 470f).

California Environmental Quality Act

CEQA requires public agencies to evaluate the implications of their projects on the environment and includes *historical resources* and Tribal Cultural Resources as part of the environment. If a project results in significant adverse impacts on *historical resources* or Tribal Cultural Resources, the impact should be disclosed, and mitigation measures must be considered.

ENVIRONMENTAL SETTING (BASELINE):

Based on information gathered from the California Historical Resources Information System (CHRIS) in November 2019, 19 cultural resource investigations have previously been conducted within 1 mile of the Area of Potential Effect (APE) for MRS 09. Two of the 19 previously conducted cultural resource studies intersect a portion of the APE. The CHRIS record search identified 20 previously recorded cultural resources within 1 mile of the APE for CSLO MRS 09. The resources identified include numerous prehistoric and historic sites such as bedrock mortar (a circular depression in a rock outcrop or naturally occurring slab, used by people in the past for grinding of grain, acorns or other food products) sites and historic scatter (a layer or scatter of artifacts deposited on the ground's surface). None of these resources intersects the CSLO MRS 09 APE; however, one resource is directly adjacent to the APE.
Prior to fieldwork, qualified project archaeologists will conduct surveys within the investigation area for CSLO MRS 09 and confirm previously recorded site locations and record any new sites identified. Survey methods are described in the Cultural Resources Survey Work Plan. The results of the surveys will be summarized in a Cultural Resources Survey/Inventory Report following the surveys and will include recommendations for monitoring, if needed (see Cultural Resources Survey/Inventory Report July 2020, USACE). In addition, prior to initiating any field activities, cultural resources training will be provided to all project personnel by the project archaeologist as presented in Section 17.3.2 of RI/FS/QAPP and Cultural Resources Survey/Inventory Report July 2020, USACE.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
United States Army Corps of Engineers, July 2020 Cultural Resources Survey/Inventory Final Report

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:

- Investigation, by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation or within a consolidation area; and
- Transportation of equipment on existing roads.

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

Impact Analysis:

Prior to fieldwork, qualified project archaeologists will conduct surveys within the investigation area for CSLO MRS 09 and confirm previously recorded site locations and record any new sites identified. Survey methods are described in the Cultural Resources Survey Work Plan. The results of the surveys will be summarized in a Cultural Resources Survey/Inventory Report following the surveys and will include recommendations for monitoring, if needed. In addition, prior to initiating any field activities, cultural resources training will be provided to all project personnel by the project archaeologist

In addition, the project biological and cultural resources coordinator will be on-site the first week of field operations to provide identification and avoidance training to the project team. Non-intrusive methods will be used during the project. Non-intrusive methods, such as visual surveys have a low potential for impacting cultural resources depending on what type of equipment is used to conduct the survey. Intrusive methods have the potential to impact a cultural resource if the dig area is within proximity of a cultural resource. Every effort will be made to avoid resources identified within the project area.

During the fieldwork, if features or artifacts of interest are encountered, the team will go around the features or artifact and not disturb it. For all cultural features or artifacts that are found, the location of each item will be recorded with a GPS point, a photo will be taken, and a brief description of the item will be recorded. This information will be provided to the USACE PM and USACE Archaeologist at the end of the field day, or earlier if appropriate

Every effort will be made to identify cultural resources within the project area and to avoid them during UXO activities. However, unexpected cultural remains exist, particularly below the surface. If prehistoric or historical-period archaeological resources are encountered, then the location will be noted in the field log and recorded using a GPS unit (if possible). If human remains are encountered during the project, then the project archaeologist will notify the County Coroner pursuant to Health and Safety Code section 7050.5. If Native American human remains or any associated grave goods are found, as described in the Native American Graves Protection and Repatriation Act, Section 2(3), then work will cease in the area of the discovery, and the USACE and state archaeologists will be notified immediately as well as the Native American Heritage Commission. All human remains will be left in place until the appropriate action is defined.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Refer to response a, which describes protection methods and actions to be taken for inadvertent finds of potential significance.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Refer to the response a, which describes disturbance or identification of human remains outside of dedicated cemeteries.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

California Historic Resources Register website: https://www.ohp.parks.ca.gov/ListedResources/

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

Native American Heritage Commission, http://nahc.ca.gov/new-pages/tools/

United States Army Corps of Engineers, July 2020 Cultural Resources Survey/Inventory Final Report

6. ENERGY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in 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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings.

ENVIRONMENTAL SETTING (BASELINE):

Activities will not require power from onsite utilities.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of energy resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the Proposed Project Site, no environmental studies relating to energy resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:

- Investigation, by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation or within a consolidation area; and
- Transportation of equipment on existing roads.

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

Impact Analysis:

This project does not utilize the consumption of energy resources in a manner the would be considered wasteful, inefficient or unnecessary during the RI/FS for UXO/MEC.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis:

This project will not have a conflict or obstruct state or local plan for renewable energy during the recovery, identification and disposal of MEC/UXO.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Legislative Information. 2015. SB-350 Clean Energy and Pollution Reduction Act of 2015. October. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

7. GEOLOGY AND SOILS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting geological or soil resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The CSLO MRS lies among the intermontane basins in the coastal mountains of California. These basins, formed as a result of folding and faulting, are depressions (or structural troughs) that parallel the coastline. These folds and faults primarily trend northwestward and result from the deformation of older rocks from the intense pressures of colliding continental plates. The rocks underlying the basins and that form the surrounding mountains are primarily marine sediments and igneous and metamorphic rocks (U.S. Geological Survey [USGS], 1995). The dominant rock types

underlying the MRS in order of prevalence are: sandstone, serpentinite, greenstone, and mudstone, all of which are from the Mesozoic or Cenozoic eras (USGS, 2005).

The depth of soil development varies across CSLO depending on locations. Within CSLO MRS 09, soil development is more mature and depth to bedrock is significantly deep. The variable geology (the Franciscan mélange, described below) may result in substantial variability in concentrations for some of certain metals, such as zinc and copper. The basins are partially filled with unconsolidated and semi-consolidated marine sedimentary rocks deposited during periodic encroachment of the sea and with unconsolidated continental deposits that consists of sedimentary rock and weathered igneous material transported into the basins primarily by mountain streams. These continental deposits and marine sediments are tens of thousands of ft. thick in some basins. In most basins, almost all of the permeable material consists of unconsolidated continental deposits (primarily sand and gravel) (USGS, 1995).

The underlying bedrock within the MRS and adjacent region is intensely folded, fractured and faulted. The site is underlain by a mixture of metamorphic, igneous and sedimentary rocks less than 200 million years old. Scattered throughout the site are areas of fluvial sediments overlaying metamorphosed material known as Franciscan mélange. These areas are intruded by plugs of volcanic material that comprise a chain of former volcanoes extending from the southwest portion of the site to the coast. Due to its proximity to the tectonic interaction of the North American and Pacific crustal plates, the area is seismically active (USACE, 2007b).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of geological and soils resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the limited potential for impacts to geological and soils resources associated with this project, no studies have been conducted.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:
- Investigation, by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation or within a pit; and
- Transportation of equipment.

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

Impact Analysis:

The amount of soil being excavated would be minimal and the subsurface MEC/anomalies would be removed and safely detonated. Although temporary disturbances due to intrusive investigation and intentional detonations may occur, excavations would be made with hand tools and would be limited in number and size. As a project control, activities would include avoidance of sensitive species and restoration activities would include replacement of topsoil with original vegetation to the extent allowed by terrain. Long term impacts would not occur. There would be no risk of substantial adverse effects.

The primary release mechanisms presenting safety hazards associated with the potential for MEC include blast pressure, fragmentation hazards and thermal hazards. During all initial fieldwork and all intrusive activities, two UXO IIs (or above) will accompany the survey crew. The two UXO II or above will conduct (1) visual surveys for surface munitions prior to the survey crew entering a suspected area and (2) an analog geophysical survey of each intrusive activity site to ensure the site is anomaly free prior to the surveying crew setting monuments or driving stakes. These individuals will not be assigned additional survey tasks that would interfere with the MEC safety aspects of area clearance for driving stakes, iron pins, monuments, or other survey control, which would penetrate the surface in a potentially MEC-contaminated area.

Any suspected or known MEC encountered during excavation will be clearly marked with flagging tape and its position noted on the dig sheet and other appropriate site maps. The UXO Team Leader (UXO III) will evaluate the item found and report its condition to the SUXOS and UXOSO. No MEC will be moved without positive

identification of the item and evaluation of its condition. No MEC identified for destruction will be removed from its location without concurrence between the SUXOS and UXOSO that the item may be moved.

If an excavated geophysical target is considered to be MEC, it will be uncovered sufficiently to obtain a positive identification of the item. If the item is identified as MEC, a determination will subsequently be made as to whether it is acceptable to move. A determination on moving and disposal of MEC will be made by the SUXOS and UXOSO for each occurrence. The on-site USACE OESA will be notified of the decision prior to movement for each occurrence. It may be decided that individual MEC items should be relocated for disposal in order to achieve an adequate safe separation distance. Consolidated shots will be performed in accordance with the approved ESP and in accordance with USACE *Procedures for Demolition of Multiple Rounds (Consolidated Shots) on Ordnance and Explosives (OE) Sites*, August 1998.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The site is not listed as a fault zone on the California Department of Conservations' Earthquake Zones of Required Investigation map. The MEC survey, identification and BIP will localized, take place on the surface, and have no impact on existing fault lines.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

ii) Strong seismic ground shaking?

Impact Analysis:
MEC survey, identification and BIP will localized, take place on the surface, and will not create strong seismic ground shaking.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis:

MEC survey, identification and BIP will localized, take place on the surface, and have no impact on ground failure.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

iv) Landslides?

Impact Analysis:

MEC survey, identification and BIP will localized, take place on the surface, and have no impact on land slides. MEC will be excavated using hand tools using care to remove the overburden and subsequently replaced after survey work is completed.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

All excavations will be backfilled to pre-existing grade conditions using the previously excavated soil. Consequently, there will be no loss of topsoil.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

MEC and MD are anticipated to be located within the first 0-6 inches bgs. All excavations will be backfilled to pre-existing grade conditions using the previously excavated soil. Consequently, there will be no loss of topsoil, and there is no construction associated with this project. Consequently, the above listed effects would not occur.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

There is no construction associated with this project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Analysis:

There is no construction associated with this project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

f. Directly or indirectly destroy a unique paleontological resources or site unique feature?

Impact Analysis:

Bristol will have a minimum of one qualified archaeological monitor present during all portions of fieldwork and RI activity that require archaeological monitoring. Archaeological monitors will provide archaeological training sessions to all USACE and field personnel at the start of fieldwork and provide USACE the attendance sign-in sheet for the training sessions. The archaeological training will include at a minimum stop-work authority and procedures; recognition and protection of archaeological sites and artifacts that are known to be in the area; and avoidance areas and minimization measures. Archaeological monitors will comply with responsibilities presented in the PWS.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

Areas More Likely to Contain Naturally Occurring Asbestos:
https://ww2.arb.ca.gov/sites/default/files/classic//toxics/asbestos/ofr_2000-019.pdf

Air Pollution Control District, San Luis Obispo County: https://www.slocleanair.org/air-quality/air-forecasting-map.php

California Department of Conservation, https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed May 2021)

8. GREENHOUSE GAS EMISSIONS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

In 2012, the City of San Luis Obispo established a Climate Action Plan that identified measures and implementation strategies in order to achieve the City's greenhouse gas (GHG) reduction target of 1990 emission levels by 2020. The City's Climate Action Plan is currently being updated. In addition, the City is currently developing a plan for achieving carbon neutrality by 2035. The City of San Luis Obispo 2005 Community Wide GHG emissions inventory showed that 50% of the city's GHG emissions came from transportation, 22% came from commercial and industrial uses, 21% came from residential uses, and 7% from waste. Statewide legislation, rules, and regulations have been adopted to reduce GHG emissions from significant sources. Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extended the State's GHG reduction goals and required the California Air Resources Board (CARB) to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

Other statewide policies adopted to reduce GHG emissions include AB 32, SB 375, SB 97, Clean Car Standards, Low Carbon Fuel Standard, Renewable Portfolio Standard, California Building codes, and the California Solar Initiative. The City recently updated its Climate Action Plan (CAP). The plan establishes a community-wide goal of carbon neutrality by 2035, adopts sector specific goals, and provides foundational actions to establish a trajectory towards achieving those goals.

ENVIRONMENTAL SETTING (BASELINE):
The Site consists mainly of rolling hills classified as grassland. This is used primarily for agricultural purposes (i.e., grazing). During the hot and dry summer and fall months, the grass throughout the Site becomes a critical fire hazard. There are periodic vegetation removal events (i.e., intentional burning).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the limited potential for impacts to GHG emissions associated with this project, no studies have been conducted.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:
None.

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

Impact Analysis:

Blow-in-Place (BIP) events will result in limited-short-term emissions. The gaseous products formed by the explosion are normal constituents of the atmosphere and are readily dispersed. No measurable effect on air quality would result from the explosive destruction of ordnance within the project area by the use of open detonation. Therefore, the project-related impacts to air quality would be short-term and insignificant. The scope of the project is small and will be performed in three to four months that it is inconceivable that significant amounts of greenhouse gas would be emitted.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The scope of the project is small and short in duration that it is inconceivable that significant amounts of greenhouse gas would be emitted. No construction equipment will be used.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

9. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations: Resource Conservation and Recovery Act (RCRA) Title 42 United States Code and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, hazardous waste generators are governed by 40 CFR part 262, subpart E and transporters of hazardous waste governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations: Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste. California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

Military Munitions were historically used at CSLO and they may potentially be present in various media at the Site. However, the nature and extent of their presence have not been characterized; therefore, they may pose an unacceptable hazard to present and future land users. It is likely that MEC may be encountered during this project. MEC has been discovered in the MRS area during previous investigations. It is anticipated that the MEC item presenting the greatest fragmentation distance is from the 3.5 in rocket Projectile. The Site currently contains limited MEC that may be active and could potentially detonate if encountered by the public.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hazards and hazardous materials effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
This project is being conducted as part of a Remedial Investigation (RI)/Feasibility Study

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:

- Investigation, by excavation, of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation within a consolidation area;
- Transportation of equipment; and
- Movement and fueling of vehicles.

a. Create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials?

   Impact Analysis:

   The Munitions and Explosives of Concern (MEC) Hazard Assessment (MEC HA) and the MRS Prioritization Protocol (MRSPP) will be used to address MEC hazards at the Site. MEC/Unexploded Ordnance (UXO) will be encountered during this project. MEC/UXO hazards and safety precautions are outlined in the Activity Hazard Analysis (AHA) tables in the RI/FS Work Plan Additionally, a 200- meter safety exclusion zone (EZ) will be established around each UXO Team during intrusive investigation operations. Access to the EZ will be restricted to essential personnel only while intrusive operations are being conducted. During intrusive operations, personnel will be limited to UXO team members, the Senior Unexploded Ordnance Supervisor (SUXOS), the UXO Safety/Quality Control (QC) Officer, authorized essential personnel and the on-site USACE Ordnance and Explosive Safety Specialist (OESS). When intrusive operations are not being conducted, access to the site will be limited to personnel under the direct escort of a qualified UXO Technician.

   Geophysical surveys will be conducted on generally parallel transects with site-specific orientation with transect spacing determined based on range type and munitions by two-or three-person field teams using man-portable carts. A UXO escort will accompany the geophysical field teams to guide them away from potential MEC hazards. If natural/cultural monitors have not accomplished surveys during the surface visual surveys, monitors will also accompany the team to ensure environmentally sensitive locations are protected. Transect path and spacing will be dependent on ROE parcel access, terrain, and vegetation cover. Transect paths will deviate from the planned transect paths to avoid hazards and obstacles.

   MEC that are identified as unsafe to handle (unacceptable to move) will be “blown-in-place” (BIP) to reduce hazards to the public and to UXO Technicians who locate the MEC. Prior to conducting disposal operations, an exclusion zone (EZ) will be established, and all non-essential personnel will be evacuated from within the EZ. Prior to priming the disposal charges, all avenues of ingress will be physically blocked by guard personnel. Radio communications will always be maintained between all parties involved with the Minimum Separation Distance (MSD) closure and disposal activities. Closure of the EZ will be maintained by all personnel until authorization from the SUXOS, signaling completion of disposal activities, has been received. Constant vigilance will be maintained by all personnel to detect any intrusion into the EZ or over flights of aircraft bearing towards the MSD. Upon completion of disposal activities,

the disposal team leader and one UXO Technician will visually inspect each disposal shot. One of these personnel will perform the visual inspection while the other stands by at a safe distance prepared to render assistance in the event of an emergency. Upon completion of this inspection, and providing that there are no residual hazards, the SUXOS will authorize continuation of Site operations within the EZ, including post-BIP soil sampling if required.

Storage areas and temporary facilities for logistic support will be located in off-site compounds that provide easy access to the project location. These sites will be used to store project equipment, such as all-terrain vehicles, temporary offices for personnel, and project management, dumpsters and roll-off bins for waste and UXO-related material, and a secured area for the project magazine if necessary.

Temporary fencing, erosion control, and other site-specific controls may be necessary if the project base is not within an existing secured compound.

Munitions debris (MD) that is collected during the day will be staged at a single location at the Site for removal at the end of the day. The collection point will be near an established access route (such as a dirt road or paved road that provides enough area for a vehicle to turn around). Upon completion of the day's activities, the MD shall be removed from the Site and transported to the off-site bin or container designated for MD.

Vehicle fueling and maintenance of project vehicles will be conducted off-site at paved and contained areas. If a severe leak of fuel or other vehicle fluids occurs, the following procedures will be employed:

- Berm the fuel spill site with dirt so that the fuel or fluid does not spread;
- Apply oil-absorbing material to the spill (each vehicle will be equipped with a spill kit);
- Report the spill to the SUXOS immediately; and
- Remove the contaminated soil and dispose in an approved landfill.

The project includes a Health and Safety Plan that addresses potential hazards, provides requirements for personnel training and protection, and MEC handling procedures. All MEC-related activities will be conducted by trained personnel.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

The proposed activities should reduce the number of potential ordnance items within the study area. As these items are found during the investigation, they will need to be addressed. Risk of upset will be minimized through proper handling of BIP. The gaseous products formed by the explosion are normal constituents of the atmosphere and are readily dispersed. No measurable effect on air quality would result from the explosive destruction of ordnance within the project area using open detonation. Therefore, the project related impacts to air quality would be short-term and insignificant.

The project team will coordinate with local agencies and government to ensure that project activities do not inconvenience public services and their ability to provide services to the community.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

The project activities will not be within one-quarter mile of an existing school or proposed school. The nearest preschool and educational center are approximately 1.5 miles away. Additionally, the gaseous products formed by the explosion are normal constituents of the atmosphere and are readily dispersed. No measurable effect on air quality would result from the explosive destruction of ordnance within the project area using open detonation. Therefore, the project-related impacts to air quality would be short-term and insignificant. Also refer to the responses to items a. and b. above.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

The Site is listed on the Cortese list (EPA ID 40910001) of Hazardous Waste sites. The project serves to locate and remove MEC hazards.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

The project is not located within an airport land use plan nor within two miles of a public airport or public use airport. The project would result in no airport related safety hazards for people residing or working in the project area.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

The project is being conducted under supervision of the local emergency responders including the San Luis Obispo Sheriff's Department, Cal Fire and California Poly Technical Institute Emergency Response. Emergency response plans or emergency evacuation plans will not be impaired.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09). There are no permanently occupied structures within the MRS. Site visits and interviews with property managers indicate ranching activity takes place periodically on the property.

Blow-in-Place (BIP) events will result in limited fire risk. The fire department will be notified a minimum of 24 hours prior to any scheduled demolition operation. During dry conditions (as determined by the fire department) demolition operations will be conducted in the morning hours prior to 10:00 am and the disposal site area may require wetting in order to help mitigate fire potential. Sandbag mitigation with a water tamp may also be opted for as a means of fire mitigation. The limited scope of the project and extensive coordination efforts with local emergency services will assure that public services are not affected. The following notifications will be made a minimum of 24-hours prior to conducting any demolition activity: on-site USACE OESS, local fire department, local police, and stakeholders located in or adjacent to, the MRS where the demolition activity will occur. The fire department will be alerted to stand by during demolition operations. In the event of a fire site personnel will not attempt to extinguish the fire. Site personnel will immediately evacuate the site to beyond the MSD and notify appropriate stakeholders.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

California Department of Conservation web site: https://www.conservation.ca.gov/

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

10. HYDROLOGY AND WATER QUALITY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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 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 offsite;	☐	☐	☐	☒
(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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The State Water Resources Control Board and the Regional Water Quality Control Boards (collectively Water Boards) share authority to implement the Federal Clean Water Act (CWA, 33 U.S.C. §1251 et seq.) and California's Porter-Cologne Water Quality Control Act (California Water Code, Section 7). The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.

The Water Boards enforce waste discharge requirements through National Pollutant Discharge Elimination System (NPDES) permits. The Porter-Cologne Act mandates the Regional Water Board to develop, adopt and implement a Basin Plan for the Region. The Water Quality Control Plan for the San Francisco Bay Basin (SFB Basin Plan) is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the Region.

The following are also applicable:

- The State Board published a resolution (SWRCB Resolution No. 88-63, as revised by Resolution No. 2006-0008) adopting policy regarding sources of drinking water where exceptions are provided for waters meeting certain criteria.
- The U.S. Environmental Protection Agency promulgated numeric water quality criteria for priority toxic pollutants and other water quality standards provisions to be applied to inland surface waters, enclosed bays and estuaries in California (California Toxics Rule, CTRs).
- A California Stormwater Construction General Permit is required for construction projects disturbing more than 1 acre. The legally responsible person is required to electronically file permit registration documents consisting of a notice of intent, risk assessment, site map, SWPPP, annual fee, and signed certification statement through the State Water Board's Storm Water Multi-Application and Report Tracking System.

ENVIRONMENTAL SETTING (BASELINE):

Both the city of San Luis Obispo and San Luis Obispo County extract groundwater from the San Luis Obispo Valley Groundwater Basin, which underlies the San Luis and Edna Valleys and is bounded on the southwest by the San Luis Range, on the northeast by the Santa Lucia Range, and on all other sides by contact with impermeable Miocene and Franciscan Group rocks. The southeastern part of the valley is drained by tributaries of Pismo and Davenport Creeks. The northwestern part of the valley is drained by San Luis Obispo, Stenner, and Prefumo Creeks (State of California, 2004).

Groundwater wells in this region generally yield from 20 to 300 gallons per minute (gpm). The California Regional Water Quality Control Board reports that the depths of the municipal/irrigation wells range to 210 feet below ground surface (bgs) and average of 90 feet bgs. The depths of the domestic wells are unknown (State of California, 2004).

CSLO MRS 09 is located in the Estero Bay and Salinas Hydrologic units and the Morro Creek-Frontal Pacific Ocean and Santa Margarita Creek-Salinas River watersheds. Chorro Creek-Frontal Morro Bay (draining west) and Santa Margarita Creek (draining east) are the predominant sub-watersheds. Though there are no surface water sources within CSLO MRS 09, there are several creeks within 1,200 ft. of the MRS, including Chorro Creek and several smaller unnamed streams as depicted in the United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP. Most of the creeks are intermittent tributaries of Chorro Creek, which drains west into the Pacific Ocean via Morro Bay.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
The list of hydrology and water resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the limited potential for impacts to hydrology and water quality associated with this project, no studies were conducted.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:

- Investigation, by excavation, of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation within a consolidation area;
- Transportation of equipment; and
- Movement and fueling of vehicles.

Analysis as to whether or not project activities would:

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

   Impact Analysis:

   There are no project activities that could affect water quality or discharge waste to water; consequently, no impacts will result. Soil samples will be collected before and after any BIP actions. Post detonation sampling and analysis

will be performed if demolition of UXO by detonation is conducted. Based on the size of the munitions requiring BIP actions, the size of the decision unit may change, and sampling protocol will be up to the discretion of the sampling team. Historically post BIP samples have shown MC levels are below screening levels and they are not presumed to violate any water quality standards or waste discharge requirements.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

There will be no construction to interfere with groundwater recharge and no ground water will be used during the project; consequently, no impacts will result.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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;

Impact Analysis:

There will be very few excavations per an acre. The excavations will be limited to a few cubic feet and be promptly backfilled; consequently, there will be no impacts to the Site drainage or to the course of a stream or river that would result in substantial erosion or siltation on or off-site.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;

Impact Analysis:

Refer to the response to item c (i) above.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

(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

Impact Analysis:

Runoff water will not be created by the project, nor will the project contribute substantial sources of polluted runoff.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

(iv) impede or redirect flood flows?

Impact Analysis:

There is no construction associated with this project. Consequently, there will be no impacts from structures. Soil removal from excavated areas will be backfilled with pre-existing soil and there will be no changes to the topography.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

As stated previously, no structures will be built, and project activities will not affect flood potential. The site is not subject to floods, tsunami, or seiche zones; consequently, there are no potential impacts associated with this project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Runoff water will not be created by the project, nor will the project contribute substantial sources of polluted runoff. There is no construction associated with this project. No housing will be placed. The project will not have the potential to degrade water quality because runoff or other water impacts will not be created. Historically post BIP samples have shown MC levels are below screening levels and they are not presumed to violate any water quality standards or waste discharge requirements.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study, Workplan QAPP, Camp San Luis Obispo, CA

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

11. LAND USE AND PLANNING				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

ENVIRONMENTAL SETTING (BASELINE):

The population in San Luis Obispo County is approximately 284,010 (U.S. Census Bureau, 2018). CSLO MRS 09 is located approximately 5 miles northwest of the City of San Luis Obispo, which has a population of 47,446 (See Figure A). Based on observations made during previous site visits, there is one private residence (associated with the shooting range facility) less than 0.25 miles to the west of the MRS, 66 occupied structures within 2 miles of the MRS, and there are business and recreational facilities associated with the public shooting range located adjacent to and within the MRS. These facilities have low occupancy rates on a daily basis.

The 26-acre CSLO MRS 09 is located in San Luis Obispo County, California; approximately 8 miles east of the Pacific Ocean (at Morro Bay) and approximately 5 miles northwest of U.S. Highway 101 between the cities of San Luis Obispo and Morro Bay. CSLO MRS 09 is situated on two parcels. One parcel (19 acres of the MRS) is owned by the CDFW and designated as the San Luis Obispo Wildlife Area. A portion of this parcel is also used as a public shooting range operated by the SLOSA for long range targets (i.e., no firing points are located within the MRS; only target stands). The second parcel (7 acres of the MRS) is owned by Cal Poly and is used for agricultural purposes including cattle grazing (See Figure C). The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09)-See Figure B. There are no permanently occupied structures within the MRS. Site visits and interviews with property managers indicate ranching activity takes place periodically on the property.

MRS 09 is adjacent to the Central Coast Firearms Education Foundation firing range of the San Luis Obispo Sportsmen's Association. According to David Ragsdale and Mike Hall, both from Cal Poly, because nearby portions of MRS-05 are currently a public shooting range, there can be as many as 100 visitors daily near to the Site (Parsons, 2007). The public range also hosts 500 to 600 people at special events that include the Annual John Wayne Shoot-Out and the National Championships. Portions of nearby MRS-05 (primarily the 3.5" Rocket Range #15) are used for hosting campers and recreational vehicles during these special events that occur five to seven times a year; Mr. Ragsdale considered that there are probably 100 to 250 campers for each of these events.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:
The list of land use and planning resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the lack of land use changes in or near the Proposed Project Site, no environmental studies relating to land use and planning were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
None.

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis:

This project would not divide and established community.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

There will be no changes to the use of the site; consequently, there will be no conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study, Workplan QAPP, Camp San Luis Obispo, CA

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12. MINERAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):
No laws, ordinances, regulations, or standards protecting mineral resources are applicable to the Proposed Project.
ENVIRONMENTAL SETTING (BASELINE):

The CSLO MRS lies among the intermontane basins in the coastal mountains of California. These basins, formed as a result of folding and faulting, are depressions (or structural troughs) that parallel the coastline. These folds and faults primarily trend northwestward and result from the deformation of older rocks from the intense pressures of colliding continental plates. The rocks underlying the basins and that form the surrounding mountains are primarily marine sediments and igneous and metamorphic rocks.

The dominant rock types underlying the MRS in order of prevalence are: sandstone, serpentinite, greenstone, and mudstone, all of which are from the Mesozoic or Cenozoic eras.
The basins are partially filled with unconsolidated and semi-consolidated marine sedimentary rocks deposited during periodic encroachment of the sea and with unconsolidated continental deposits that consists of sedimentary rock and weathered igneous material transported into the basins primarily by mountain streams. These continental deposits and marine sediments are tens of thousands of ft. thick in some basins. In most basins, almost all of the permeable material consists of unconsolidated continental deposits (primarily sand and gravel)

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of mineral resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

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?

   Impact Analysis:

   The limited nature and scope of the project will not affect mineral resources.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Less Than Significant With Mitigation Incorporated
   ☐ Less Than Significant Impact
   ☒ No Impact

b. 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?

Impact Analysis:

The limited nature and scope of the project will not affect mineral resources.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

13. NOISE				
Would the project result in:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

City of San Luis Obispo Municipal Code, Title 9, Ch 12 Noise Controls

ENVIRONMENTAL SETTING (BASELINE):
The area is served by a primary highway (State Highway 1 that intersects the site) and some secondary roads. MRS 09 is adjacent to the Central Coast Firearms Education Foundation firing range of the San Luis Obispo Sportsmen's Association. The MRS is located north of Highway 1 (See Figure A). Occupied structures located near the MRS include facilities associated with CDFW, Cal Poly Agricultural School, and Cuesta College (See Figure C).

The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09)-See Figure B. There are no permanently occupied structures within the MRS. Site visits and interviews with property managers indicate ranching activity takes place periodically on the property.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The following portions of Section 9.12.050 of the Municipal Code are relevant to this project:

"Construction/Demolition.

a. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of seven p.m. and seven a.m., or any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by exception issued by the community development department. (This section shall not apply to the use of domestic power tools as specified in subsection B 10 of this section.)" and

"*Vibration.* Operating or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at one hundred fifty feet (forty-six meters) from the source if on a public space or public right-of-way."

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:
Based on the limited potential for impacts from noise associated with this project, no studies have been conducted

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:

- Investigation, by excavation, of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation within a consolidation area;
- Transportation of equipment; and
- Movement and fueling of vehicles.

Analysis as to whether or not project activities would 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?

Impact Analysis:

Due to the remote location, non-permanently occupied facilities, and lack of residential housing (the residence at the SLOSA shooting facility is not occupied 24/7 by a resident and only used by contractor managing site), the BIP activities would only impact temporal occupants located at the shooting range which already has re-occurring noise disruption. The noise generated by the field crews and their equipment could disrupt wildlife at the Site. Intrusive activities have a small, temporary, localized impact at the Site of the anomaly investigation. Although the disruption should only be temporary, minor disturbances may occur to wildlife foraging and cover requirements during BIP events and other field crew activities. Detonations from BIP events will produce brief excessive noise levels. An exclusion zone (EZ) consistent with Federal standards will be established during detonations, and there will be no exposures to residences to excessive noise levels.

On-Site personnel will be equipped with noise protection equipment. MEC/UXO will be encountered during this project. MEC/UXO hazards and safety precautions are outlined in the Activity Hazard Analysis (AHA) tables in the RI/FS Work Plan. Additionally, a 200- meter safety EZ will be established around each UXO Team during intrusive investigation operations. Access to the EZ will be restricted to essential personnel only while intrusive operations are being conducted. During intrusive operations, personnel will be limited to UXO team members, the SUXOS, the UXO Safety/Quality Control (QC) Officer, authorized essential personnel and the on-site USACE OESS. When intrusive operations are not being conducted, access to the Site will be limited to personnel under the direct escort of a qualified UXO Technician. Refer also to the Hazards and Hazardous Materials section of this Initial Study. Occupational Safety and Health Act requirements for worker safety will be enforced for the project.

All work will be limited to the allowed hours of seven a.m. and seven p.m. and will be a significant distance from residences to avoid noise impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

b. Generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis:

Detonations during the BIP events will have brief excessive pressure waves; however, an exclusion zone consistent with Federal standards will be established during detonations, and there will be no exposures of off-site persons to excessive ground borne vibration or ground borne noise levels. Also refer to item a. above.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

The project is not located within an airport land use plan nor within two miles of a public airport or public use airport. The project would result in no airport related noise for people residing or working in the project area.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

City of San Luis Obispo, https://sanluisobispo.municipal.codes/Code/9.12.050

14. POPULATION AND HOUSING				
Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting population and housing resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

Current land use is primarily for agricultural and recreational purposes (Figure 3a). Future land use is anticipated to remain the same with the shooting range targets remaining on the CDFW parcel and cattle grazing continuing on the Cal Poly and CDFW parcels (See Figure B). No other development of the land is anticipated.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of population and housing resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:
None.

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

   Impact Analysis:

   The project is short term and will not affect population growth or the need for new homes or businesses in the area.

   Conclusion:

   ☐ Potentially Significant Impact
   ☐ Less Than Significant With Mitigation Incorporated
   ☐ Less Than Significant Impact
   ☒ No Impact

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

Impact Analysis:

The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09). There are no permanently occupied structures within the MRS. Site visits and interviews with property managers indicate ranching activity takes place periodically on the property. Those individuals working or visiting the work site may be subject to an exclusion zone based on the presence of MEC or BIP activities. Consequently, there is no need for construction of replacement housing on Site or elsewhere.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study, Workplan QAPP, Camp San Luis Obispo, CA

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15. PUBLIC SERVICES				
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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting public services resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The local population is very limited near the site. There are less than five houses within a mile of the site. The nearest preschool (Miss Josey's Playground) and educational center are approximately 1.5 miles away. The Bayside Care Center nursing home is more than 4 miles away. Sierra Vista Regional Medical Center and French Hospital are more than 6 miles away (See Figure A). The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09)-See Figure B. There are no permanently occupied structures within the MRS.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of public services resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact of the Proposed Project Site to public services resources, no environmental studies relating to public services resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
- Treatment of collected items, which may include MEC open detonation or within a consolidation area; and
- Transportation of equipment.

Analysis as to whether or not project activities would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

i. Fire protection?

Impact Analysis:

The fire department will be notified a minimum of 24 hours prior to any scheduled demolition operation. During dry conditions (as determined by the fire department) demolition operations will be conducted in the morning hours prior to 10:00 am and the disposal site area may require wetting in order to help mitigate fire potential. Sandbag mitigation with a water tamp may also be opted for as a means of fire mitigation. The limited scope of the project and extensive coordination efforts with local emergency services will assure that public services are not affected. The following notifications will be made a minimum of 24-hours prior to conducting any demolition activity: on-site USACE OESA, local fire department, local police, and stakeholders located in or adjacent to, the MRS where the demolition activity will occur. The fire department will be alerted to stand by during demolition operations. In the event of a fire site personnel will not attempt to extinguish the fire. Site personnel will immediately evacuate the site to beyond the MSD and notify appropriate stakeholders.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

ii. Police protection?

Impact Analysis:

See impact analysis in subsection a.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

iii. Schools?

Impact Analysis:

See impact analysis in subsection a.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

iv. Parks?

Impact Analysis:

See impact analysis in subsection a.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

v. Other public facilities?

Impact Analysis:

See impact analysis in subsection a.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

16. RECREATION				
	Potentially Significant Impact	**Less Than Significant with Mitigation**	**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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The property within CSLO MRS 09 is zoned for agricultural uses and also includes facilities used for recreational purposes (i.e., SLOSA operates a public shooting range on property managed by CDFW and long-range targets associated with the range are located within the boundary of MRS 09). There are no permanently occupied structures within the MRS. The site consists mainly of rolling hills and grasslands. During the hot and dry summer and fall months, the grass throughout the Site becomes a critical fire hazard.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of recreational resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of impacts to recreational resources in or near the Proposed Project Site, no environmental studies relating to recreational resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
There is a slight chance that an MEC item discovered during the project may temporarily necessitate the enforcement of no trespassing in the exclusion zone.

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?

   Impact Analysis:

   There will be no increase in the use of existing recreational facilities related to the RI/FS

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

There are no recreational facilities associated with this project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

17. TRANSPORTATION				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Federal laws and regulations: Resource Conservation and Recovery Act (RCRA) Title 42 United States Code Subtitle C and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, transporters of hazardous waste are governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations: Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste. California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

The area is served by State Highway 1, which is adjacent to the site to the south side of the MRS, and secondary roads. Based on site visit during the SPP process, site conditions will consist of numerous barbed-wire fences with locked and unlocked gates within the MRS (including several gates associated with the shooting range facilities and one gate on the west side of the MRS associated with Cal Poly pasture). Fences and gates are located on state-owned property (managed by CDFW and Cal Poly and used by SLOSA); therefore, access to the site for the field team is expected to be unrestricted.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact to transportation resources in or near the Proposed Project Site, no environmental studies relating to transportation resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:
None.

Analysis as to whether or not project activities would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Impact Analysis:

The project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis:

The project will not impact vehicle miles traveled by the public, distance of automobile travel attributable to the project or on transit and non-motorized travel. The Site personnel will be limited to a number of vehicles daily and will have no effect on traffic in the area.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

All Site vehicles will adhere to established speed limits and maintain cautious speeds where limits do not exist. Site safety officers will be present to enforce strict safety standards established as part of the RI/FS Work Plan.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

d. Result in inadequate emergency access?

Impact Analysis:

There are several egresses from the Site. During the entire project, the Site safety officer will maintain a plan for emergency access.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study, Workplan QAPP, Camp San Luis Obispo, CA

Google Maps website: https://www.google.com/maps/@35.3446031,-120.7591094,3532m/data=!3m1!1e3

18. TRIBAL CULTURAL RESOURCES				
Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.				
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:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) 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	☐	☐	☐	☒
b) 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.	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Because the Project is being conducted with federal funding on lands formerly occupied by a military installation, Section 106 of the National Historic Preservation Act (NHPA) applies and USACE is the executing agency. Additionally, this project is being carried out under Comprehensive Environmental Response, Compensation, and Reliability Act (CERCLA), which applies as well.

Tribal cultural resources are defined in PRC Div. 13 Section 21074. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1).

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

According to the 2007 Site Specific Work Plan from Parsons Corporation for USACE, the State Historic Preservation Office and Central Coastal Information Center did not identify the presence of cultural resources in the Camp San Luis Obispo area. However, according to both David Ragsdale and Mike Hall, both of Cal Poly, Native American cultural resources are present in nearby MRS-05 and they are frequently visited by schoolchildren during field trips (USACE Time Critical Removal Work Plan July 2010 and RI/FS Workplan June 2013). Asked about MRS 09, Mike Hall deferred to Aaron Lazanoff of Cal Poly. Mr. Lazanoff (personal communication, March 24, 2020) noted that he was not aware of any Native American cultural resources at the Site.

DTSC complied with the requirements of AB 52. In addition, DTSC worked with the U.S. Army Corps of Engineers in collaboration with the State of California Office of Environmental Equity | Environmental Justice and Tribal Affairs to conduct outreach to the 13 Tribes identified by the NAHC. Only two tribes responded out of 13 letters that were sent thru the Army Corp. The state Tribal Outreach received no comments/responses. The Xolon Salinan Tribe wanted to verify what would happen if any artifacts were identified and how the process worked to catalog the events. They requested that any artifacts found be left in situ which the U.S. Army Corp agreed too. The Chumash Tribe confirmed the work location is outside their area.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Tribal cultural resources are defined in PRC Div. 13 Section 21074. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe (PRC 21081.3.1).

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The U.S. Army Corps of Engineers, Los Angeles District, completed a Cultural Resources Survey/Inventory Report that was finalized in July 2020. Their consultant requested a records search from the Central Coast Information Center (CCIC) of the California Historic Resources Information System (CHRIS) located at the University of California, Santa Barbara, which houses records for San Luis Obispo County. The records search was requested on September 27, 2019; the results were received on October 22, 2019.

IMPACT ANALYSES AND CONCLUSIONS:

Project Activities Likely to Create an Impact:

- Investigation, by excavation with hand tools of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation or within a consolidation area; and
- Transportation of equipment on existing roads.

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

Impact Analysis:

There are no resources listed on the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Non-intrusive methods will be used during the project. Non-intrusive methods, such as visual surveys have a low potential for impacting cultural resources depending on what type of equipment is used to conduct the survey. Intrusive methods have the potential to impact a cultural resource if the dig area is within proximity of a cultural resource. Every effort will be made to avoid resources identified within the project area.

Prior to commencement of field activities, all on-site personnel will be briefed on the cultural and historical, resource sensitivity of the area. Methods for minimizing potential impacts on cultural and historical resources will form an integral part of the on-site training.

Every effort will be made to identify cultural resources within the project area and to avoid them during UXO activities. However; unexpected cultural remains exist, particularly below the surface. If prehistoric or historical-period archaeological resources are encountered, then the location will be noted in the field log and recorded using a GPS unit (if possible). If human remains are encountered during the project, then the project archaeologist will notify the County Coroner pursuant to Health and Safety Code section 7050.5. If Native American human remains or any associated grave goods are found, as described in the Native American Graves Protection and Repatriation Act, Section 2(3), then work will cease in the area of the discovery, and the USACE and state archaeologists will be notified immediately as well as the Native American Heritage Commission. All human remains will be left in place until the appropriate action is defined.

National Historic Preservation Act (NHPA) Documentation - The project archaeologist, in coordination with the USACE and the state archaeologist, will prepare all documentation required for compliance with the NHPA, section 106. The USACE archaeologist will prepare all cultural resources sections as part of any environmental documentation required by the National Environmental Policy Act.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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 Resource 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.

Impact Analysis:

Based on the research and outreach, it was determined that there are no known resources that meet these requirements. Refer to the response i. above.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

Native American Heritage Commission, Sacred Lands File Search. http://nahc.ca.gov/

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

California Historic Resources Register website: https://www.ohp.parks.ca.gov/ListedResources/

United States Army Corps of Engineers, July 2020, Cultural Resources Survey/Inventory Report

Consultation for Geophysical Investigation-Cultural Outreach/Historical Properties Memo MRS09

19. UTILITIES AND SERVICE SYSTEMS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting utilities and service systems resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The Site consists mainly of rolling hills classified as grassland. The surface layer of soil is coarse, sandy loam and shaley loam. There are few utility corridors around the site. Project activities will occur in areas not served by utilities.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of utilities and service systems resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to utilities and service systems resources in or near the Proposed Project Site, no environmental studies relating to utilities and service systems resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:

None.

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?

Impact Analysis:

The project will not generate wastewater, require relocation or construction of expanded water, wastewater or stormwater drainage, electrical power, natural gas or telecommunication facilities that will affect the environment. Limited amounts of water will be used to control dust.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Refer to the responses to items a. through c. above/below, no new water facilities are needed for the project.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

There will be no impact to the capacity of the wastewater treatment plant based on the scope of work. Porta Potties will be brought onto site for personnel usage.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

A minimal amount of waste will be generated by the project. Any debris will be collected and properly disposed. Munitions debris (MD) that is collected during the day will be staged at a single location at the Site for removal at the end of the day. Upon completion of the day's activities, the MD shall be removed from the Site and transported to the off-site bin or container designated for MD.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

As noted in item d., waste generated during the day-to-day activities will be collected and removed from the Site at the end of each day, and any IDW will be managed and disposed as described in the Investigative Derived Waste (IDW) Plan in IDW Management Revision 0 -09/09/2019 of QAPP Worksheet 21. Upon leaving the Site, all waste will be disposed of in dumpsters or other proper receptacles at the project office location. All pin flags and other marking devices will be collected and removed from the Site when they are no longer needed. MD that is collected during each day will be transported to the project's Explosive Magazine location and placed in the bin/container designated for MD. Federal and state disposal requirements shall be complied with during implementation of the project activities.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Stud QAPP, Workplan, Camp San Luis Obispo, CA

20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
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?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The Site consists mainly of rolling hills classified as grassland. This is used primarily for agricultural purposes (i.e., grazing). During the hot and dry summer and fall months, the grass throughout the Site becomes a critical fire hazard. There are periodic vegetation removal events (i.e., intentional burning).

The weather at CSLO MRS 09 is generally mild and considered Mediterranean. Within the foothills to the north of the former camp, the winters are considered somewhat cooler and wetter, and the summers are warmer and drier. Average rainfall of 29 inches (generally occurs between November and March (San Luis Obispo County, 2013). As the clouds move inland from the coastline and rise over the mountains, rainfall totals can average from 30 to 45 inches along the ridgetops. The wind is generally from the west-southwest blowing to the north-northwest.

State Responsibility Areas are boundaries adopted by the Board of Forestry and Fire Protection and are areas where the California Department of Forestry and Fire (CAL FIRE) has a financial responsibility for fire suppression and prevention. Review of the California State Responsibility Area Viewer and the Contra Costa County Fire Hazard Severity Zone Maps for State Responsibility Area and Local Responsibility Area indicate the Proposed Project Site is located within a Moderate Hazard Severity Zone and not located in a Very High Hazard Severity Zone (VHFHSZ) but is located in a State Responsibility Area.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of wildfires resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to wildfire resources in or near the Proposed Project Site, no environmental studies relating to wildfire resources were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Project Activities Likely to Create an Impact:
- Investigation, by excavation, of some individually identified subsurface MEC/anomalies;
- Treatment of collected items, which may include MEC open detonation within a consolidation area;
- Transportation of equipment; and
- Movement and fueling of vehicles.

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis:

The project is being conducted under supervision of the local emergency responders including the San Luis Obispo Sheriff's Department, Cal Fire and California Poly Technical Institute Emergency Response. Emergency response plans or emergency evacuation plans will not be impaired. All excavation will be done with hand tools and will not cause significant fire risk.

Blow-in-Place (BIP) events will result in limited fire risk. The fire department will be notified a minimum of 24 hours prior to any scheduled demolition operation. During dry conditions (as determined by the fire department) demolition operations will be conducted in the morning hours prior to 10:00 am and the disposal site area may require wetting in order to help mitigate fire potential. Sandbag mitigation with a water tamp may also be opted for as a means of fire mitigation. The limited scope of the project and extensive coordination efforts with local emergency services will assure that public services are not affected.

The following notifications will be made a minimum of 24-hours prior to conducting any demolition activity: on-site USACE OESS, local fire department, local police, and stakeholders located in or adjacent to, the MRS where the demolition activity will occur. The fire department will be alerted to stand by during demolition operations. In the event of a fire site personnel will not attempt to extinguish the fire. Site personnel will immediately evacuate the site to beyond the MSD and notify appropriate stakeholders.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:
There will likely be a very small number of items treated by detonation. The treatment of MEC items is not expected to create any objectionable odors. It is highly unlikely that substantial pollutant concentrations will be released during the RI/FS. The local population is very limited near the site. There are less than five houses within a mile of the site. The nearest preschool (Miss Josey's Playground) and educational center are approximately 1.5 miles away. The Bayside Care Center nursing home is more than 4 miles away. Sierra Vista Regional Medical Center and French Hospital are more than 6 miles away. No changes to drainage due to ordnance recovery or BIP are anticipated.

See response (a) for fire mitigation techniques. Due to slope, prevailing winds, seasonal grass presence and BIP activities there is a potential for project occupants' exposure to fire and pollutant concentrations from a wildfire. As a contingency to mitigate against the potential fire hazards in the region, CDFW schedules-controlled burns in coordination with Cal Fire and the Public Fire Range within the MRS. In addition to prescribed controlled burns, fire breaks are also bulldozed into various areas within CDFW portion of MRS to mitigate against uncontrolled fire dangers as a result of slope, winds and seasonal grasses. A planned controlled burn event is currently being planned during 2021 fire season within the CDFW portion of MRS.

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Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less Than Significant Impact
☐ No Impact

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?

Impact Analysis:

No construction will take place at the site that will require the installation or maintenance of roads, fuel breaks, power lines, emergency water or other utilities. Disposal site area for BIP may require wetting from water truck in order to help mitigate fire potential.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

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?

Impact Analysis:

There will likely be a very small number of items treated by detonation. The treatment of MEC items is not expected to create any objectionable odors. It is highly unlikely that substantial pollutant concentrations will be released during the RI/FS. The local population is very limited near the site. There are less than five houses within a mile of the site. The nearest preschool (Miss Josey's Playground) and educational center are approximately 1.5 miles away. The Bayside Care Center nursing home is more than 4 miles away. Sierra Vista Regional Medical Center and French Hospital are more than 6 miles away. No changes to drainage due to ordnance recovery or BIP are anticipated.

See response (a) for fire mitigation techniques.

Conclusion:

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less Than Significant Impact
☒ No Impact

References Used:

United States Army Corps of Engineers, July 2010, Draft Final. Time Critical Removal Action Work Plan, Former Camp San Luis Obispo San Luis Obispo, CA

United States Army Corps of Engineers, July 2020, MRS 09 Remedial Investigation/Feasibility Study QAPP, Workplan, Camp San Luis Obispo, CA

United States Army Corps of Engineers, Draft Final, June 2013. Remedial Investigation/Feasibility Study, Workplan Draft Final, Camp San Luis Obispo, CA

California Department of Forestry and Fire (CAL FIRE), 2011. Contra Costa County Fire Hazard Severity Zone Maps for State Responsibility Area. November. https://gis.data.ca.gov/datasets/CALFIRE-Forestry::california-fire-hazard-severity-zones-fhsz/data?geometry=-121.599%2C35.137%2C-119.865%2C35.530&layer=1 (Accessed May 7, 2021)

21. MANDATORY FINDINGS OF SIGNIFICANCE

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project does not 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. The project does not have impacts that are individually limited but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of an individual 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. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5