INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM

For ER # 0742-2021

1. Project Title:

French Hospital Expansion Project

2. Lead Agency Name and Address:

City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

3. Contact Person and Phone Number:

Rachel Cohen, Associate Planner
(805) 781-7574

4. Project Location:

Primary Location: 1911 Johnson Avenue, San Luis Obispo, CA 93401 (APN 003-568-004, 003-568-005, 003-571-025, 003-578-026, 003-578-063, and 003-578-057)
Off-site Parking: 2075 Johnson Avenue, San Luis Obispo, CA 93401 (APN 003-682-044)

5. Project Sponsor's Name and Address:

Dignity Health Corporation
185 Berry Street, Suite 200
San Francisco, CA 94107

6. General Plan Designations:

Office

7. Zoning:

Office (O-S)

8. Description of the Project:

The proposed project consists of the phased expansion of French Hospital Medical Center campus including the construction of a two-level, 234-space parking structure with 5,800 square feet of future lab and storage space and a 2,000-square-foot helistop (Phase 1), and a four-story 89,775-square-foot patient tower, an 1,800-square-foot generator yard, and various related site improvements (Phase 2) (project). The proposed patient tower would include, but not be limited to, 82 patient rooms, dining and kitchen facilities, staff break rooms, waiting rooms, and medical imaging rooms. The project would result in an increase of approximately 45 additional employees on-site distributed between two 12-hour shifts. The project includes the reconfiguration of surface parking, addition of bicycle parking spaces, realignment of an existing bicycle path and associated open space easement, tree removal and trimming on- and off-site, landscaping, and exterior lighting. The project also includes the merging of Assessor's Parcel Number (APN) 003-568-004 (Parcel 2), APN 003-578-026 (Parcel 3), and a portion

of APN 003-578-063 (Parcel 6) to form one 14-acre parcel (Project Site; see Figure 3). Project construction would result in approximately 3,260 cubic yards of cut/export material and would require 2,370 cubic yards of imported material. All proposed earthwork would be balanced on-site to the extent feasible. Project construction is anticipated to last approximately 3 years.

Project Background

In 1993 the City of San Luis Obispo (City) approved the French Hospital Master Plan (Master Plan) and the mitigated negative declaration (MND) prepared for the Master Plan (City record number ER 109-93). The Master Plan outlined the ultimate build-out of the Project Site and included facilities to provide a range of medical services. The plan included the future construction of four buildings in addition to the existing hospital building built in 1972, and a substantial expansion of the parking area on-site. These four buildings included a 35,000-square-foot Copeland Pavilion, a 6,000-square-foot hospital office, a 30,000-square-foot medical arts building, and a 6,000-square-foot hospital expansion building. Build-out of the 1993 Master Plan envisioned a total of approximately 231,300 square feet of hospital uses on-site. Proposed additional parking associated with these new facilities included the addition of 365 parking spaces, which would have resulted in a total of 749 parking spaces on-site.

On June 1, 2004, the French Hospital Medical Center was acquired by Dignity Health Corporation. On March 15, 2013, the City approved Administrative Use Permit A 140-11 which amended the 1993 Master Plan to modify the configuration and placement of proposed buildings at French Hospital. The Copeland Pavilion was redesigned to be 18,000 square feet in size, and the square footage for the proposed hospital expansion building increased to 17,550 square feet, and a new 5,450-square-foot emergency room (ER) expansion building was added to the Master Plan. The overall gross area of proposed facilities was less than what was previously analyzed and approved, and the associated transportation and other environmental impacts associated with the amended Master Plan remained generally consistent with what was evaluated under the 2013 Master Plan. Therefore, the 2013 Master Plan Amendment was found to be consistent with the analysis of the mitigated negative declaration prepared for the 1993 Master Plan. In 2014 the Master Plan was amended again to accommodate a slightly larger medical arts building square footage (31,471 square feet where 30,000 was previously approved), which was also found to be consistent with the analysis of the mitigated negative declaration prepared for the 1993 Master Plan.

In 2016 the City approved another amendment to the French Hospital Master Plan to accommodate an expanded 58,600-square-foot four-story medical office building and new parking garage. While a portion of the approved square footage for new uses in the Master Plan have been constructed with the addition of the Copeland Education Pavilion, the remaining unused approved square footage of the Master Plan was reconfigured to accommodate most of these new uses, resulting in an increase of gross floor area from the approved Master Plan from 231,300 square feet to 248,661 square feet and a reduction in required parking spaces from 749 to 700. The 2016 Master Plan Amendment was found to be consistent with the analysis of the mitigated negative declaration prepared for the 1993 Master Plan. The four-story medical office building included in the 2016 Master Plan Amendment was not constructed and is no longer being proposed as a part of the Master Plan moving forward.

Ever since its acquisition by Dignity Health in 2004, patient care departments within the hospital facilities have been continuously upgraded. Over the past several years of detailed study, planning, and projections of community healthcare needs over the next 50 years, Dignity Health has determined that all remaining approved square footage of the Master Plan should be consolidated into a single 89,775-square-foot patient tower and new parking deck with a helistop. The proposed helistop would serve the recently completed Emergency Department expansion project as well as the proposed Neonatal Intensive Care Unit (NICU). Table 1 provides a summary of past and current proposed French Hospital expansion facilities and parking spaces.

Table 1. French Hospital Campus Master Plan Approvals Comparison

	Original (1993) Master Plan		Subsequent Master Plan Amendments								Current Proposal	
			2012 Master Plan		2013 Pavilion		2014 Medical Arts Building		2016 Medical Arts Building			
Building/ Use	**Area (sf)**	**Parking**	**Area (sf)**	**Parking**	**Area (sf)**	**Parking**	**Area (sf)**	**Parking**	**Area (sf)**	**Parking**	**Area (sf)**	**Parking**
Existing Buildings												
French Hospital	83,000	173	83,000	173	83,000	173	83,000	173	87,850	173	87,850	173
Pacific Medical Plaza (Medical offices)	48,000	185	48,000	185	48,000	185	48,000	185	48,000	185	48,000	185
Modular Business Office	1,800	6	1,800	6	1,800	6	1,800	6	1,800	6	1,800	6
OR Expansion Building	9,500	0	4,850	0	4,850	0	4,850	0	In Hospital	0	In Hospital	0
Copeland Pavilion	35,000	175	18,000	48	17,742	59	17,742	59	17,742	59	17,742	59
Not Constructed												
Hospital Office	6,000	20	6,000	20	6,000	20	6,000	20	N/A	N/A	0	0
Medical Arts Building	30,000	150	30,000	150	30,000	150	31,471	157	58,600	229	N/A	N/A
ER Expansion	N/A	N/A	5,450	27	5,450	27	5,450	27	8,669	4	8,669	4
Hospital Expansion Building	6,000	20	17,550	22	17,550	22	17,550	22	14,000	24	N/A	N/A
Patient Wing Tower	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	89,775	82
Chapel	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1,000	0
Hospital Lab/Pharmacy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4,300	14
Sub-Total	219,300	729	214,650	632	214,392	642	215,863	649	236,661	680	259,136	523
Ella Street Office Building	12,000	20	12,000	20	12,000	20	12,000	20	12,000	20	12,000	20
Total	**231,300**	**749**	**226,650**	**652**	**226,392**	**662**	**227,863**	**669**	**248,661**	**700**	**271,136**	**543**

Source: Dignity Health French Hospital New Patient Tower Plan Set, March 2021

Existing Conditions

The overall French Hospital Medical Center campus is approximately 18 acres in area and consists of 6 legal parcels: APN 003-568-004, 003-568-005, 003-571-025, 003-578-026, 003-578-063, and 003-578-057 (see Figure 2). Existing development on-site consists of the one-story French Hospital building, the three-story Copeland Health Education Building, the three-story Pacific Medical Plaza to the south of the hospital (under separate ownership), and the Ella Street medical condominiums located further to the south (under separate ownership). An 1,800 square-foot modular building that serves as a business office is located on the north side of the hospital and surface parking lots surround the buildings along the perimeter of the campus. The topography of the site is nearly flat around the existing buildings on-site, with a steep slope bank between Johnson Avenue and the front parking lot, and another steep slope bank between the rear parking areas and the undeveloped area on the west side of the site.

Project Components

Patient Tower

The proposed 89,775-square-foot patient tower building would consist of a four-story building adjacent to the existing Copeland Health Education Building (see Figure 2). In total, the patient tower would add 82 new patient beds. The ground level floor would include, but not be limited to, a lobby, a front desk, waiting rooms, indoor and outdoor dining areas, a gift shop, a kitchen, walk-in coolers and freezers, dry storage rooms, medical imaging rooms, staff break room, medical offices, restrooms, and electrical storage rooms. The second story floor would include, but not be limited to, NICU rooms, Intensive Care Unit (ICU) rooms, waiting rooms, staff break rooms, medical offices, restrooms, equipment storage rooms, and three corridors connecting to the existing French Hospital Building. The third story floor would include, but not be limited to, patient rooms, nurse stations, medical offices, a waiting room, cleaning supply rooms, equipment storage rooms, a staff lounge, restrooms, and an outdoor garden patio. The fourth story floor would include, but not be limited to, patient rooms, a family care suite, staff break rooms, nurse stations, waiting room, medical offices, and restrooms.

The project includes a request for a height variance to allow for the construction of the patient tower building to be 68 feet tall above average natural grade. The patient tower building would consist of primarily a stucco color with slate grey horizontal rib accent panels, similar to the adjacent Copeland Health Education Building (see Figure 4). The building would include roof-mounted heating ventilation and air conditioning (HVAC) equipment, which would be visually screened from view with horizontal metal panels similar to the Copeland Health Education Building. A new transformer would also be installed at the ground level southeast of the patient tower to provide electricity to the building and would be screened by proposed landscape plantings. New connections to existing water, wastewater, and telecommunications lines from Ella Street and Iris Street would also be installed to serve the patient tower.

Parking Deck and Helistop

The proposed parking deck would be constructed over an existing surface parking area located on the western side of the project site, adjacent to the existing railroad tracks (see Figure 2). The ground level area of the parking deck would include 26,000 square feet of surface level parking, an 1,800-square-foot electrical equipment storage area, a 4,000-square-foot shell space for the future development of a hospital lab, and a pedestrian plaza. The second level of the parking deck would include 31,000 square feet of parking area and a 2,000-square-foot helistop, which would be located on a platform approximately 8 feet higher than the upper level of the parking deck connected with a staircase and ramps that would provide access to the upper parking deck level. Parking spaces on the ground level of the parking deck would be reconfigured to align with the design and access ramps of the proposed parking deck. Addition of the parking deck would result in the addition of 66 new parking spaces at the location of the parking deck. The parking deck would be a cast-in-place structure approximately 19 feet in height and would be painted with exterior colors to match those of the existing Copeland Health Education Building and proposed patient tower (see Figure 5). The structure would be equipped with interior and exterior lighting and required helistop lighting. Helistop lighting would operate only during nighttime landings and would be controlled and used by pilots to provide a visual guide.

The proposed helistop would serve the existing Emergency Department and the proposed NICU on-site. Based on San Luis Obispo County Emergency Service records, the anticipated flight frequency is estimated to be approximately four helicopter trips per month. Service records show that only approximately 25% of those trips (one trip per month) would occur during nighttime hours (see Attachment 9). The addition of this helistop would significantly reduce the travel time for patients who need to be transported to other facilities to receive specialized care or be transported quickly from their location to French Hospital to receive medical care. Helicopters would not be permanently parked on-site, rather, they would fly in, pick-up or drop-off patients, then fly out on an as-needed basis.

Generator Yard

Generators would supply backup power to the proposed patient tower and other proposed facilities if electrical power is interrupted. The proposed generator yard would be enclosed by a 10-foot-tall split face block wall along portions of the perimeter adjacent to parking areas and a chain link fence along portions of the perimeter adjacent to open space areas. The yard would include one generator and space for a future second generator on a concrete pad, a 15,000-gallon diesel fuel tank, a 200-gallon day fuel tank for each generator, four emergency backup oxygen cylinders, and an adjacent trash receptacle area enclosed by a 6-foot-tall split face block wall (see Figure 6). The generator yard would be located east of the proposed parking deck and would be designed to match and/or complement the design of the parking deck. The generators would be tested once a month for no longer than 30 minutes to ensure they are able to supply backup power when needed. The project would be served by Central Coast Community Energy (3CE) for electricity provider services.

On-site Circulation and Parking Reconfiguration

Approximately 80–90% of current traffic to the project site enters the project site from a signaled intersection at Johnson Avenue. The project site supports three additional vehicle access points, including two stop-controlled intersections on Ella Street along the southeast side of the property and one from Breck Street along the northwest side of the property. A driveway is also located at the Iris Street cul-de-sac; however, it is gated and restricts daily vehicular access. The project includes widening and slight realignment of the driveway from the Johnson Avenue entrance through the project site to the proposed patient tower drop-off area.

All existing parking areas consist of surface level parking and include approximately 709 spaces. An existing parking and drive agreement with the two on-site medical offices under separate ownership allows for visitors and employees to share all parking and on-site circulation areas of the whole site. The proposed patient tower, future lab shell space, and circulation design modifications on-site would result in the loss of 85 parking spaces. With the addition of the proposed parking deck, which would add 66 parking spaces, the project site would have a total of 677 parking spaces on the whole campus, which exceeds the minimum number of required parking spaces required by the City Zoning Regulations. In addition to the parking available on campus, Dignity Health has leased an area that currently provides approximately 75 parking spaces at the Renovate First Baptist Church at 2075 Johnson Street, approximately 680 feet southeast of the project site. These spaces are utilized by employees and construction personnel and are available between 6:00 a.m. and 8:00 p.m. on Mondays, Tuesdays, Thursdays, and Fridays, and between 6:00 a.m. to 5:00 p.m. on Wednesdays. A shuttle service is available to and from this parking area during the daytime shift.

Proposed parking areas on-site would provide 10 Americans with Disabilities Act (ADA) compliant parking spaces adjacent to the proposed patient tower and 4 ADA compliant parking spaces within the parking deck. Ten electric vehicle (EV) ready parking spaces and 25 EV capable parking spaces would be provided within the reconfigured parking areas. Fourteen motorcycle parking spaces would be provided to accommodate the four required by City Zoning Regulations and to replace the 10 motorcycle parking spaces lost due to construction of the patient tower. The proposed parking areas and patient tower entry would include 15 new bicycle parking spaces.

Open Space Easement Modification

The project site currently supports an approximately 3.60-acre Open Space and Drainage Easement (herein referred to as the Open Space Easement) for a public bike path which was approved by the City in conjunction with the 2013 Master Plan amendment. The proposed project includes a modification to the existing Open Space

Easement to remove 0.11 acres of easement from the south side of the easement and add 0.17 acres of Open Space Easement to the north side of the easement (see Figure 8). This would allow for the construction of the proposed parking deck, generator yard, and additional surface parking spaces.

Parcel Modifications

The project includes the merging of APN 003-568-004 (Parcel 2), APN 003-578-026 (Parcel 3), and a portion of APN 003-578-063 (Parcel 6) to form one 14-acre parcel (Project Site; see Figure 3). Merging of these parcels would allow all project components to be located on one parcel under the same ownership.

Tree Removal, Trimming, and Landscape Planting

The project would require removal of landscaped trees currently located within the proposed footprint of the patient tower, parking deck, generator yard, and realigned site driveway. In addition, a number of tall trees within the immediate project vicinity would need to be trimmed to meet Federal Aviation Association (FAA) standards to accommodate the flightpath of helicopters using the proposed helistop (see additional discussion below, under Additional Helistop Lighting Alternative). Overall, the project would result in the removal and/or pruning of 113 trees and the trimming of 8 eucalyptus trees (see Figure 7). Trees proposed for full removal include manna gum (1), red flowering gum (1), California pepper (5), jacaranda (1), ash (3), coast live oak (1), camphor (12), Brisbane box (12), London plane (26), purple leaf plum (7), and southern blue gum (8). Trees that would be cut to the ground include silver dollar eucalyptus (4), coast live oak (20), mimosa (4). Trees that would be pruned would include California pepper (2), and southern blue gum (6). In addition, a total of 8 southern blue gum trees located within the approved helicopter flight path(s) may be trimmed per Federal Aviation Administration (FAA) requirements (refer to discussion under *Additional Helistop Lighting Alternative*, below).

The project would be subject to the City's compensatory tree planting requirements detailed within the City Municipal Code which requires planting of a minimum of one new tree for each tree authorized to be removed when planted on the same property or two new trees for each tree authorized to be removed when planted on a different property or within the public right-of-way (off site) (Municipal Code Section 12.24.090). The project includes a landscaping planting plan that includes screening trees, parking lot trees, pedestrian plaza trees, shrubs, vines, perennials, and groundcover plantings. The proposed irrigation system would be designed for maximum water efficiency and include an automatic timer, backflow prevention device, and low gallonage heads for turf and large ground cover areas. A drip-type system shall be used where appropriate. Trees would be irrigated on separate bubbler systems.

Site Lighting

The project would include installation of exterior lighting in and around entrances to the patient tower, parking deck, and generator yard, and along main walkways. Light poles in the vicinity of parking areas would be no more than 20 feet tall. Other lighting on-site would include, but not be limited to, bollard pathway lighting around the drop off entry area in front of the main entrances to the Copeland Health Education Pavilion and patient tower, light-emitting diode (LED) wall-mounted lights along the exterior of the patient tower to illuminate the exterior dining area and walkways around the building, LED canopy lights to illuminate the second floor garden of the patient tower, and in-ground LED lights to illuminate building signage.

Helistop Lighting

The helistop structure would include FAA-required lighting. Helistop lighting would operate only during nighttime landings (approximately 1 time per month) and would be controlled and used by pilots, at their individual discretion, to provide a visual guide. Preliminary estimates indicate that the amount of time the helipad would be operational for landing, patient care and takeoff would typically range from twenty minutes to one hour, although these times could vary significantly depending upon patient medical or logistic circumstances. Pilot controlled approach and delineation lighting would normally be on only during landings and takeoffs and would be turned off while waiting for patients to be loaded onto the helicopter and/or during other delays.

Helistop lighting refers to all sources of light associated with the design and function of the helistop, including:

- Helicopter landing lights operated during helicopter approach and landing. Landing light operation would be at the pilot's discretion but lights are anticipated to be turned on more than 1 mile from the landing site.
- A helistop beacon on the parking elevator tower. The beacon would consist of green, white, and yellow LEDs flashing in sequence.
- Green perimeter lights outlining the touch down and lift off (TLOF) area. Perimeter lights would also outline the landing pad for medical crews moving gurneys. Helipad lights are not meant to illuminate the helipad. These lights are designed to illuminate upwards and not outwards so that pilots approaching from above can see the lights.
- Red obstruction lights on the parking lot elevator tower and the patient tower corners and roof.
- A lighted wind cone to provide pilots with wind direction and speed information. This wind cone would be located near the northeastern corner of the top floor of the parking deck.
- Gurney ramp footlights (white) that would be separately switched so they would not be activated until after a helicopter lands and would be deactivated prior to departure. Footlights would light the ramp surface, however once the aircraft is on the heliport, the lights could be turned off until the patient is ready to be transported to the helicopter.
- One beacon and multiple obstruction lights on the patient tower to designate the building and elevator tower corners. These lights are recommended to be on from dusk to dawn, controlled via photocell (i.e., controlled based on how much light is hitting it). These lights would emit light in one direction (up) and are designed to be only visible from above.

Additional Helistop Lighting Alternative

Some of the proposed eucalyptus tree trimming that would be necessary to meet FAA standards to accommodate the flightpath of helicopters using the proposed helistop would be located on privately-owned parcels adjacent to the hospital property. Access to these parcels and the right to conduct the proposed tree trimming has not yet been secured; therefore, it is uncertain whether the adjacent property owners will permit the hospital to trim offsite trees as needed for the helistop. Therefore, the project applicant has developed an alternative plan for helicopter access to the helistop, in the event tree trimming on adjacent parcels is not allowed.

As an alternative to offsite tree trimming, two 125-foot-tall obstruction light poles would be located west of the parking deck and helistop. These light poles would include red LED lights and infrared emitters to be connected to the pilot-controlled lighting system and would be turned on only in the event of a nighttime helicopter landing. Each light pole base would be 25 inches in diameter and the pole diameter would be 7 inches. These light poles would also meet FAA standards related to the flightpath of helicopters using the proposed helistop.

Since it is unknown whether the project would ultimately provide helistop access via offsite tree trimming or placement of obstruction light poles, both alternatives have been evaluated in this document.

Helicopter Lighting

In addition to the helistop lighting described above, the helicopters travelling to and from the project site would have lighting. In addition to standard aviation lights, the helicopters would have white landing lights that would illuminate the heliport as it is approaching, similar to the landing lights that airplanes use when they are approaching a runway at night. Specifically, each helicopter would be required to have:

- Navigation lights: red on the left side, green on the right side, and white on the tail;
- Anti-collision light: red/white; and
- Landing light: white on front of the aircraft to light the landing area.

When approaching the helistop, it is expected that the helicopter landing lights may be turned on at distances of more than a mile away from the helistop. Information provided by the project applicant indicates that the total duration that helicopter lighting would be in use would be approximately 10 minutes per trip (5 minutes per landing and 5 minutes per takeoff).

Construction Phasing and Parking

Project construction would be completed in two phases. During Phase 1 of construction activities, the parking deck would be constructed and is anticipated to take 12 months to complete. Once construction of Phase 1 is completed, Phase 2 would begin and is anticipated to take 24 months to complete. Phase 2 of construction activities would include construction of the patient tower and associated connecting hallways to the existing French Hospital Building, construction of the generator yard, parking area restriping, and landscape planting.

Phase 1 of construction activities would result in the temporary loss of 216 parking spaces, resulting in overall parking capacity of 493 spaces on-site and 75 spaces off-site, for a total of 568 spaces. Phase 2 of construction activities would result in a temporary loss of 199 parking spaces onsite. When Phase 1 activities are completed, 242 parking spaces would become available, and when Phase 2 activities are completed, an additional 61 parking spaces would become available, for a total capacity of 677 on-site parking spaces and 75 off-site parking spaces, for a total of 752 spaces at completion.

9. Project Entitlements:

Architectural and Major Development Review (ARCH-0161-2019)
Conditional Use Permit (USE-0500-2019)
Variance (VAR-0499-2019)

10. Surrounding Land Uses and Settings:

Surrounding zoning and land uses are summarized below:

North: Breck Street and Fairview Street, Single-family residential neighborhood in Medium-High Density Residential (R-3) zoning, and multi-family residential housing in Medium-Density Residential (R-2) zoning

East: Johnson Avenue, single-family and multi-family residential neighborhood in R-2 zoning

South: Iris Street, George Street, Ella Street, single-family and multi-family residential neighborhood in R-2 zoning

West: Railroad, multi-family residential neighborhood in R-3 zoning

11. 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.?

Native American Tribes were notified about the project consistent with City and State regulations, including Assembly Bill 52. See Section 18, Tribal Cultural Resources, for further information on correspondence and consultation with California Native American tribes.

12. Other public agencies whose approval is required:

A permit would be required from the San Luis Obispo County Air Pollution Control District (SLOAPCD) to allow for future operation of the proposed generators.

Figure 1. Project Vicinity Map

Figure 2. Project Location Map

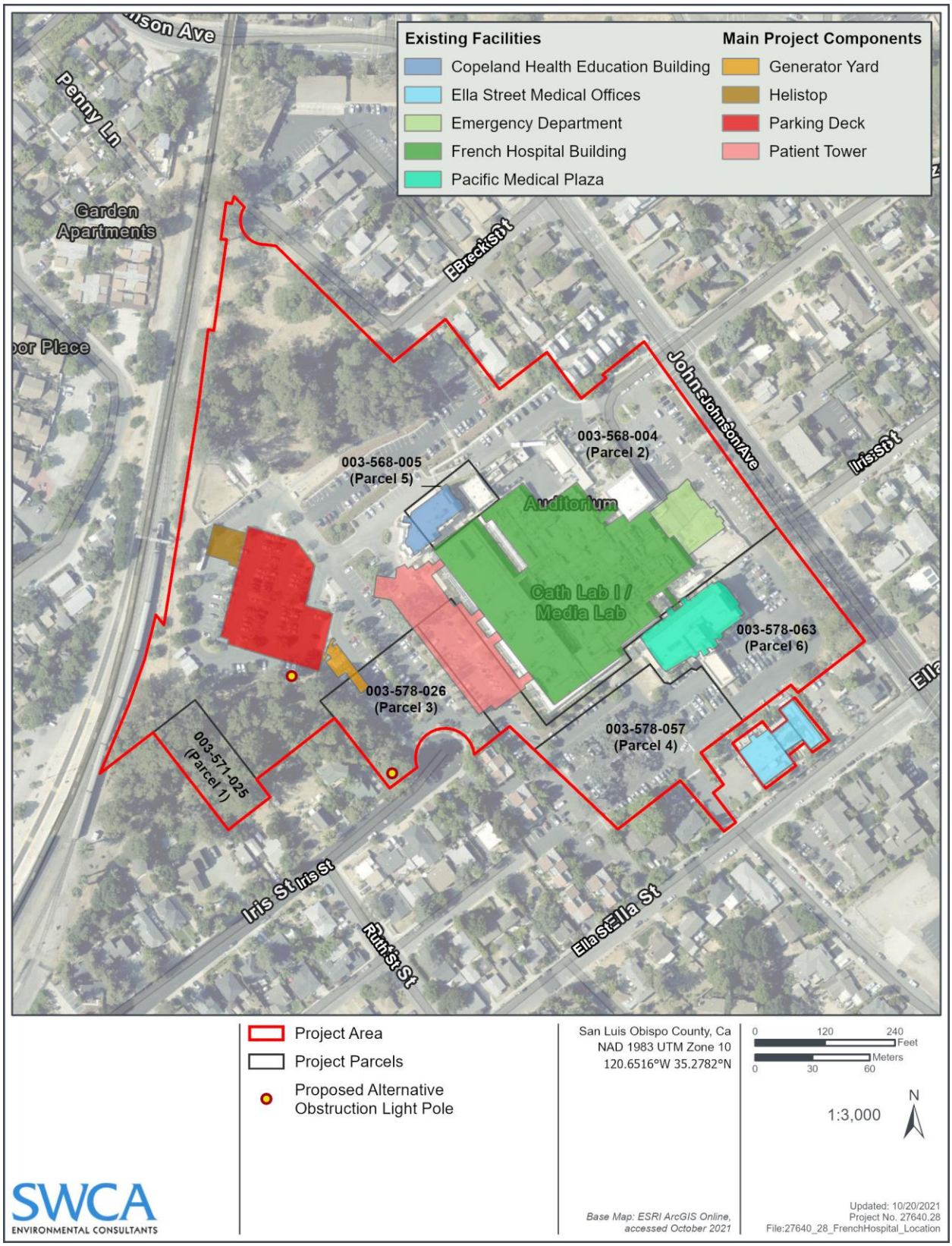

Figure 3. Proposed Parcel Modifications

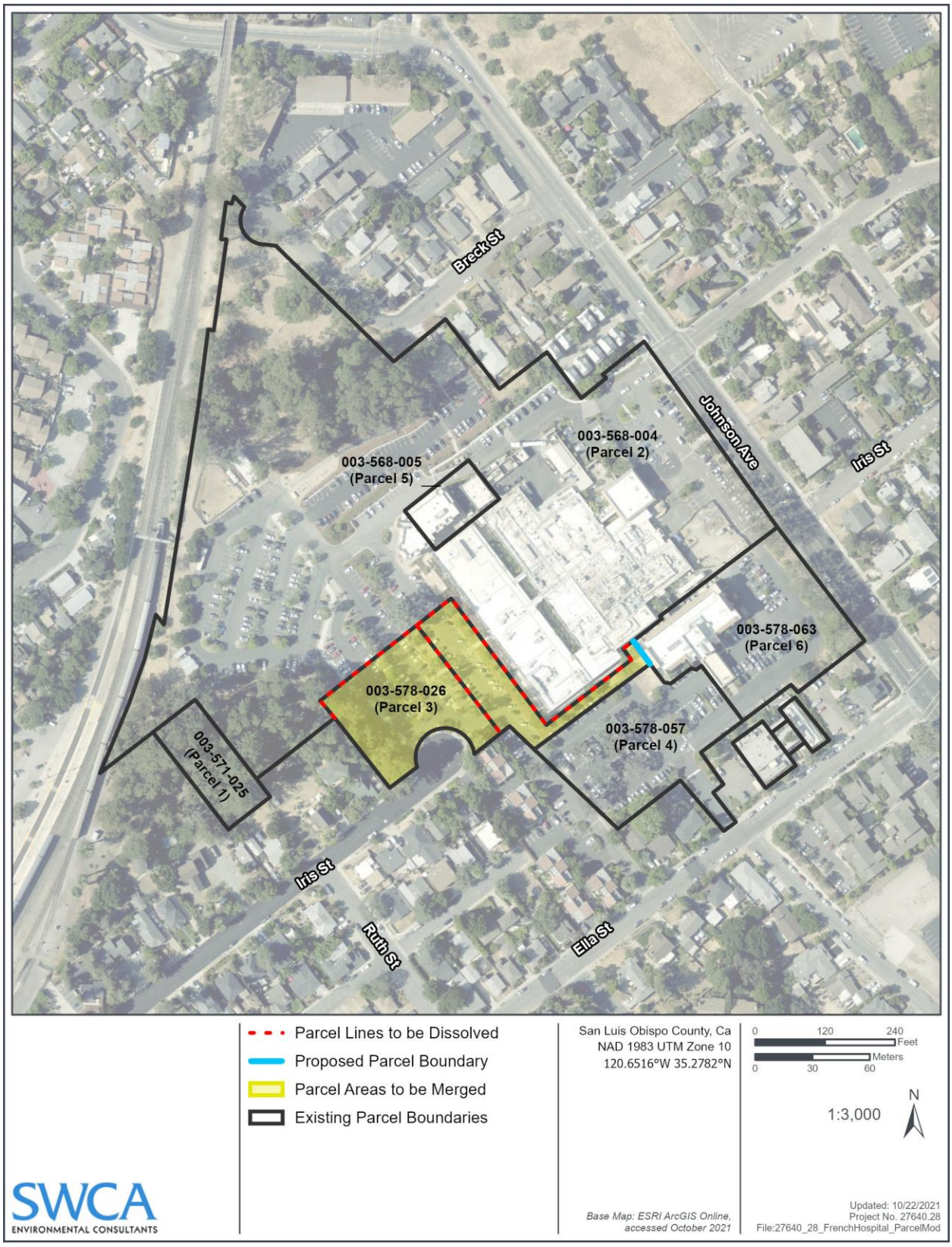

Figure 4. Patient Tower Elevations

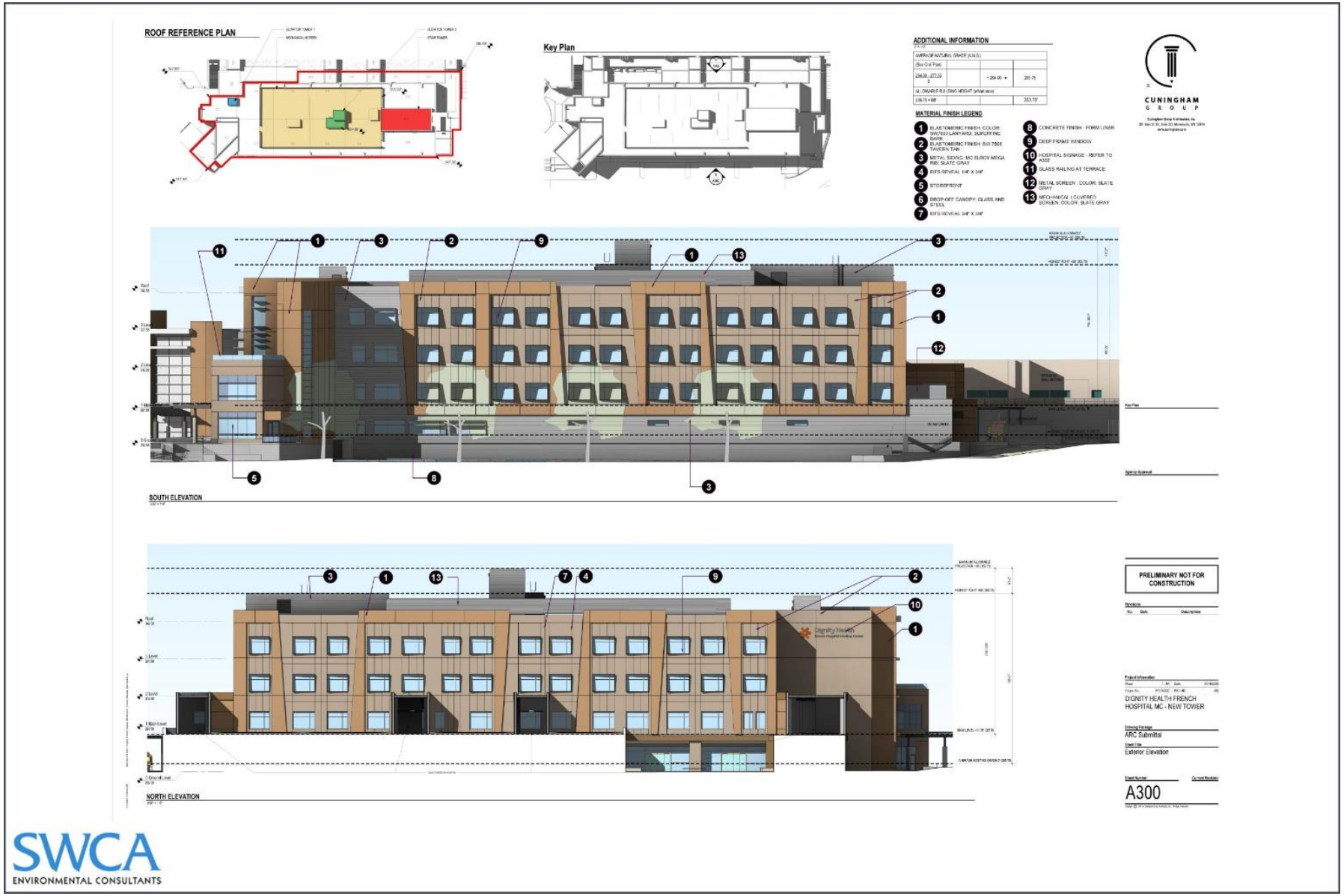

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Figure 5. Parking Deck and Helistop Elevations

Figure 6. Generator Yard Layout

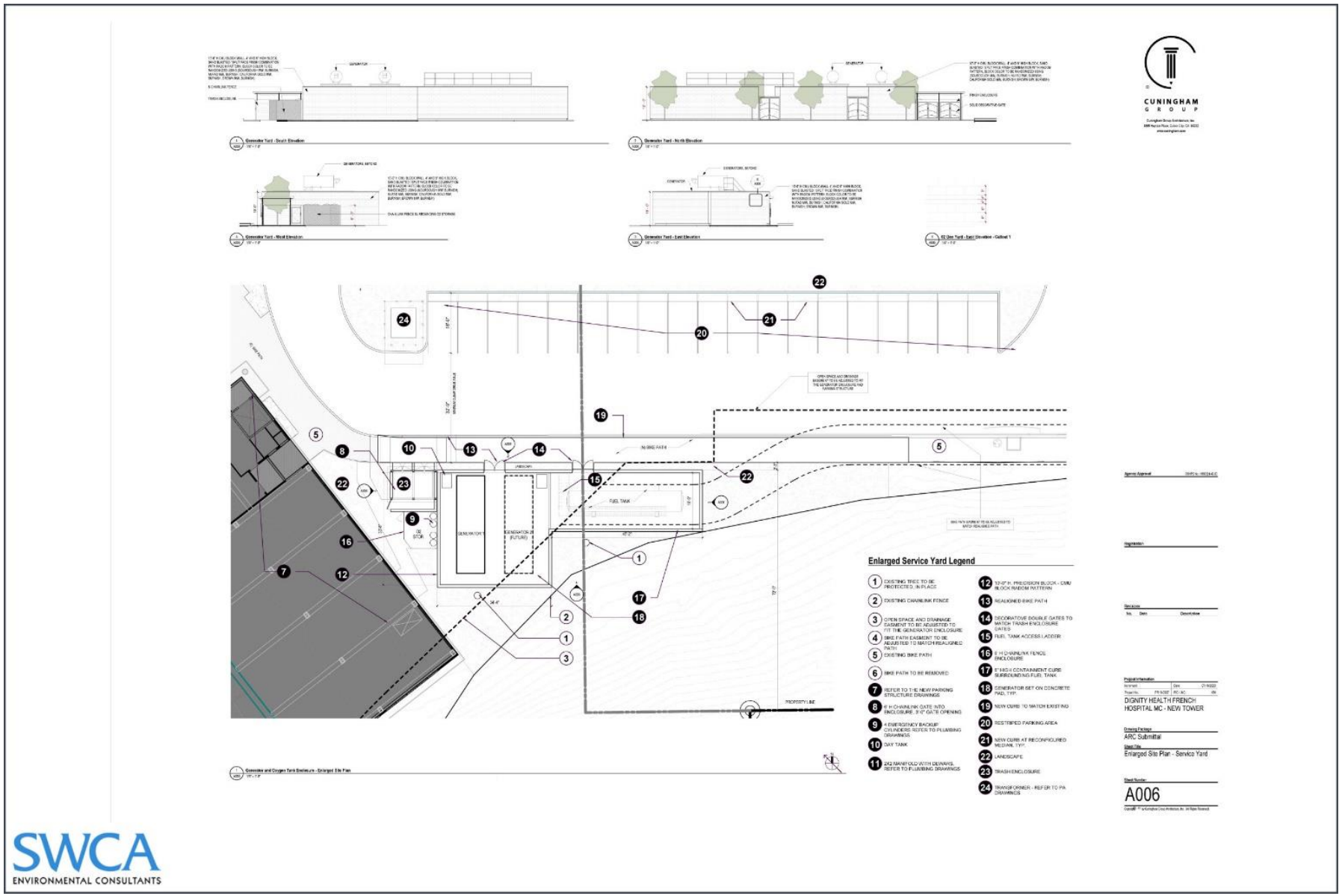

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Figure 7. Tree Removal Map

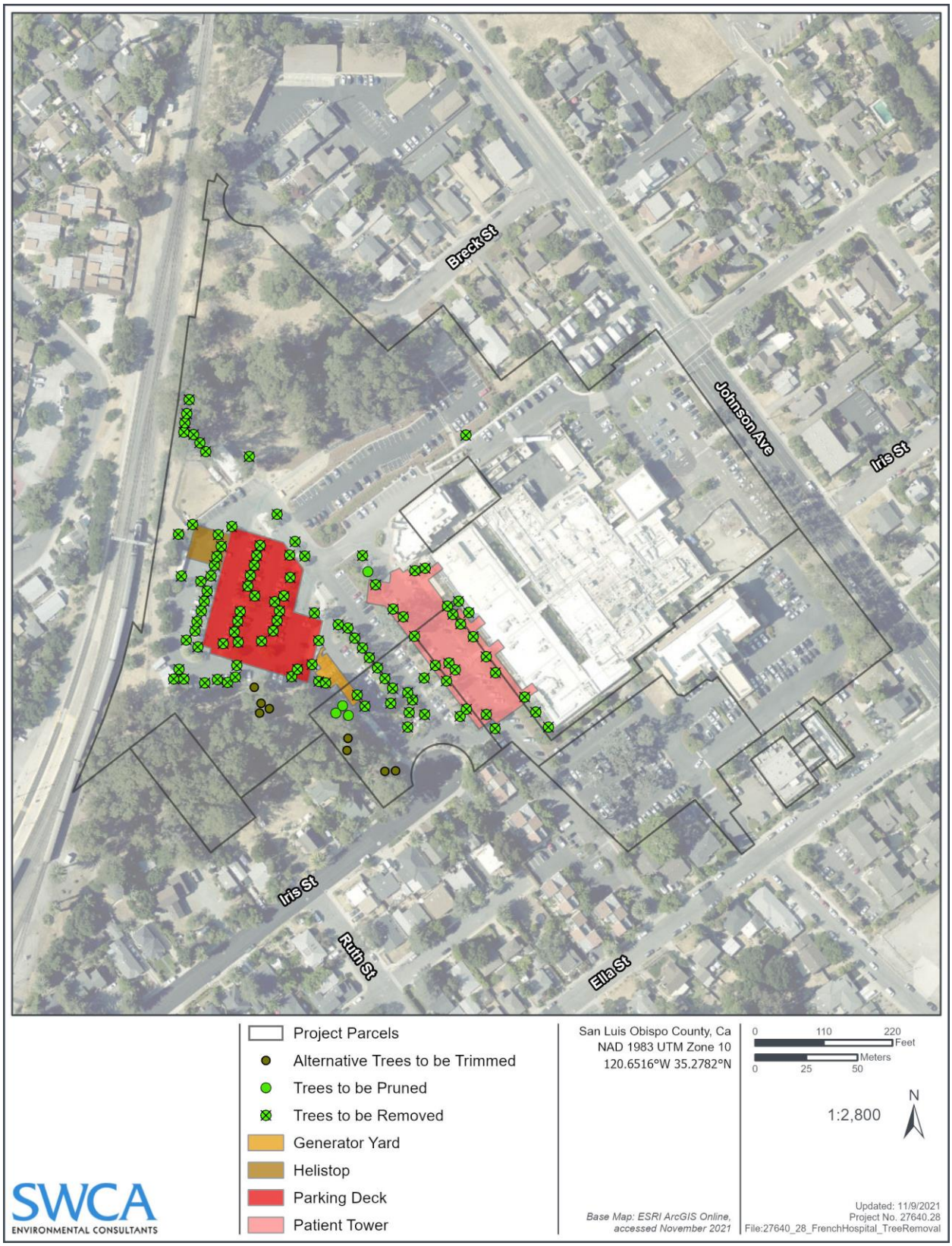
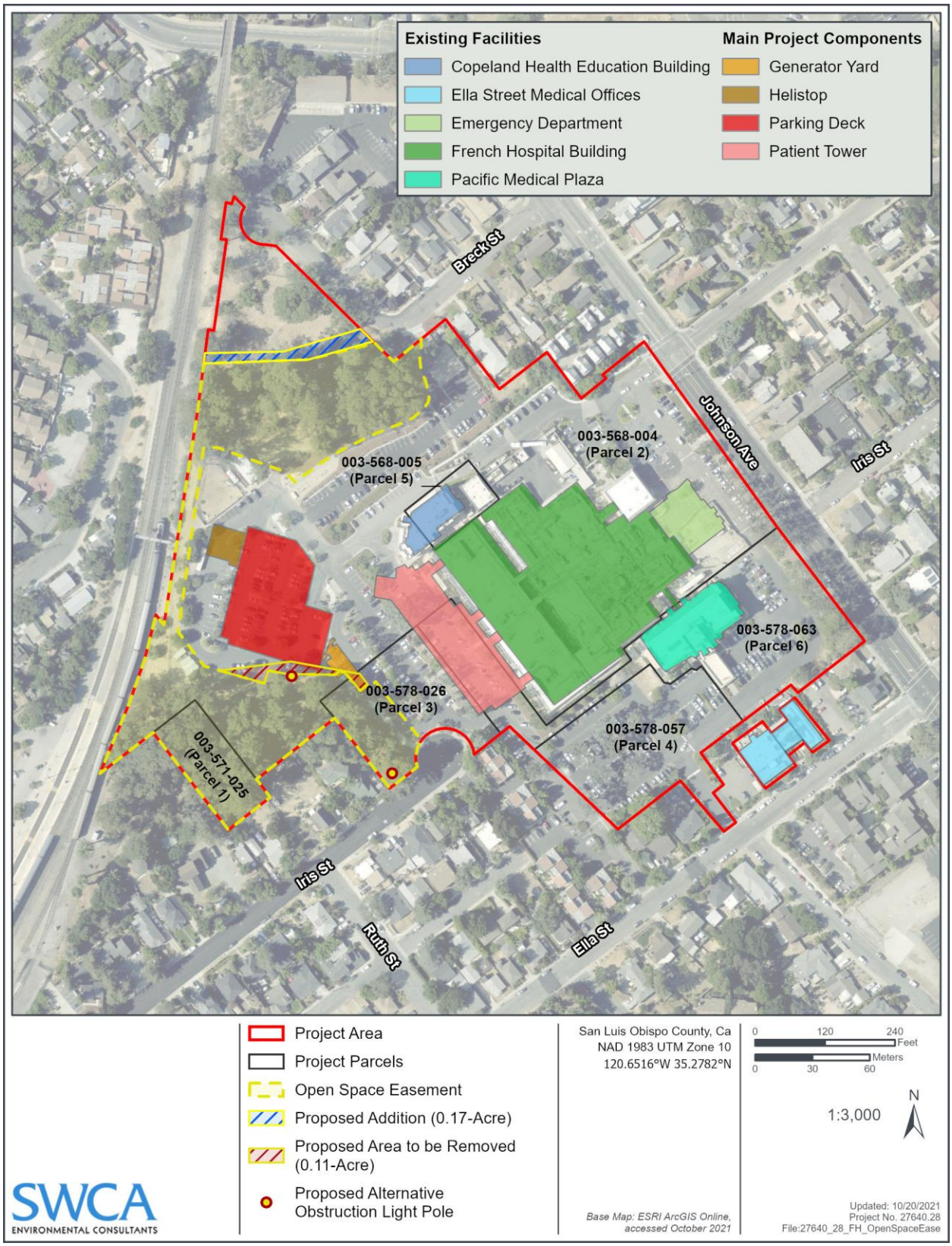


Figure 8. Proposed Open Space Easement Modifications



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 on the following pages.

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

FISH AND WILDLIFE FEES

☐	The Department of Fish and Wildlife has reviewed the CEQA document and written no effect determination request and has determined that the project will not have a potential effect on fish, wildlife, or habitat (see attached determination).
☒	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.

STATE CLEARINGHOUSE

☒	This environmental document must be submitted to the State Clearinghouse for review by one or more State agencies (e.g., Cal Trans, California Department of Fish and Wildlife, Department of Housing and Community Development). The public review period shall not be less than 30 days (CEQA Guidelines 15073(a)).

DETERMINATION (To be completed by the Lead Agency):

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(s) or "potentially significant unless mitigated" impact(s) 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 (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.	☐

Shawna Scott

Signature

March 2, 2022

Date

Shawna Scott

Printed Name

For: Michael Codron

Community Development Director

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 Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).

5. Earlier analysis 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 addressed 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. 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

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	1, 4	☐	☒	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	3, 4	☐	☐	☐	☒
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?	1, 2, 3, 8	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	1, 4, 5, 12	☐	☐	☒	☐

Evaluation

The French Hospital Medical Center is located in the northeastern portion of the City of San Luis Obispo, just below the foothills of the Santa Lucia Mountains. The overall landform of the city and its surroundings is generally defined by the convergence of the Chorro and the Los Osos Valleys. A series of low, visually distinct mountain peaks, such as Bishop Peak and Cerro San Luis, separate the two valleys and provide scenic focal points for much of the city. The Santa Lucia Mountains and Irish Hills are the visual limits of this region and are considered the scenic backdrops for much of the city. Development in the region occurs predominantly at the lesser elevations and on the low hills.

The overall development pattern in the project area is an integrated mix of residential single-family, multi-family, commercial, and institutional uses. The institutional development is in the form of medical facilities, educational facilities, public health services, and churches. This variety of uses results in an established suburban visual character surrounding the project. No single architectural theme is evident in the surrounding area.

As described in the project description, the overall French Hospital Medical Center campus is approximately 18 acres in area. Existing development on-site consists of the one-story French Hospital building, the three-story Copeland Health Education Building, the three-story Pacific Medical Plaza to the south of the hospital, and the Ella Street medical condominiums located further to the south. An 1,800-square-foot modular building that serves as a business office is located on the north side of the hospital and surface parking lots surround the buildings along the perimeter of the campus. The topography of the site is nearly flat around the existing buildings on-site, with a steep slope bank between Johnson Avenue and the front parking lot, and another steep slope bank between the rear parking areas and the undeveloped area on the west side of the site.

Landscaping throughout the project site includes a variety of ornamental and native species. Mature trees are located in the parking lots, adjacent to buildings, and along the site perimeter. Shrubs and ground covers are located throughout the site. The landscaping provides aesthetic value to the site as well as a partial visual screening of the development from the surrounding area. This existing landscaping also provides a visual continuity with the vegetated character of the adjacent neighborhoods.

The City Conservation and Open Space Element (COSE) identifies specific goals and policies intended to protect and enhance the city's visual quality and character. Policies in the COSE include, but are not limited to, the following:

- Policy 9.1.2. Urban development should reflect its architectural context. This does not necessarily prescribe a specific style, but requires deliberate design choices that acknowledge human scale, natural site features, and neighboring urban development, and that are compatible with historical and architectural resources.

- Policy 9.1.5. The City will include in all environmental review and carefully consider effects of new development, streets and road construction on views and visual quality by applying the Community Design Guidelines, height restrictions, hillside standards, Historical Preservation Program Guidelines and the California Environmental Quality Act and Guidelines.
- Policy 9.2.1. The City will preserve and improve views of important scenic resources from public places, and encourage other agencies with jurisdiction to do so. Public places include parks, plazas, the grounds of civic buildings, streets and roads, and publicly accessible open space. In particular, the route segments shown in Figure 11 (COSE) are designated as scenic roadways.
    a. Development projects shall not wall off scenic roadways and block views.
    b. Utilities, traffic signals, and public and private signs and lights shall not intrude on or clutter views, consistent with safety needs.
    c. Where important vistas of distant landscape features occur along streets, street trees shall be clustered to facilitate viewing of the distant features.
    d. Development projects, including signs, in the viewshed of a scenic roadway shall be considered "sensitive" and require architectural review.
- Policy 2.2. Projects should incorporate as amenities views from and within private development sites. Private development designs should cause the least view blockage for neighboring property that allows project objectives to be met.
- Policy 9.2.3. Outdoor lighting shall avoid: operating at unnecessary locations, levels, and times; spillage to areas not needing or wanting illumination; glare (intense line-of-site contrast); and frequencies (colors) that interfere with astronomical viewing.

The City has adopted a Lighting and Night Sky Preservation Ordinance that applies to projects requiring a building permit or electrical permit that includes outdoor lighting or signage, with the exception of emergency aviation lighting operated by public agencies or for the purpose of aviation safety. This ordinance identifies lighting policies including, but not limited to, requiring outdoor lighting to be designed, installed, and maintained to prevent nighttime sky light pollution and be directed downward and away from adjacent properties and public rights-of-way, and no lighting on private property shall produce an illumination level greater than two maintained horizontal foot-candles at grade on any property within a residential zone.

a) Scenic vistas are generally defined as high-quality views displaying good aesthetic and compositional value that can be seen from public viewpoints. From viewpoints in the immediate vicinity of the project, scenic vistas of the Morros, Santa Lucia foothills and other visual resources are available although are often filtered or obscured by intervening neighborhood development or landscaping.

Patient Tower

The largest component of the project, the proposed Patient Tower, would be 68 feet in height (78 feet including the top parapet, at a top elevation of 353.7 feet above sea level). Although the proposed Patient Tower building itself would be taller than the surrounding structures, it would be constructed at a lower ground elevation south of the existing hospital building, such that the top of the proposed Patient Tower building would actually be slightly lower than the existing Pacific Medical Plaza building.

Views to visual resources and scenic vistas such as the Morros and the Santa Lucia foothills would remain intact and would be largely unaffected by the project as seen from most surrounding viewpoints (See Figures 9 through 13).

Figure 9. Existing view of the project site from Terrace Hill Open Space looking north.

Figure 10. Photo-simulation of the project (without obstruction light poles) as seen from Terrace Hill Open Space looking north.

Figure 11. Photo-simulation of the project (with obstruction light poles) as seen from Terrace Hill Open Space looking north.

KVA-1 - From Terrace Hill Open Space looking north. Simulation of the project with obstruction light poles

Figure 12. Existing view of the project site as seen from Johnson Avenue looking west.

Figure 13. Photo-simulation of the project (without obstruction light poles) as seen from Johnson Avenue looking west.

The proposed Patient Tower building would be located on a portion of the site somewhat away from surrounding streets and neighborhoods, which would reduce its potential to block distant views. From a few closer viewpoints the Patient Tower would be seen rising up against the open sky. Although the Patient Tower would be a relatively tall building, its siting combined with the general orientation of most of the surrounding public views relative to visual resources, it would not substantially affect views of available scenic vistas such as the Morros or the Santa Lucia foothills, or other quality visual resources.

Parking Deck and Helistop

The proposed parking deck and helistop would rise approximately 19 feet above the existing parking lot. Because of its location at the southwestern portion of the site, combined with the substantial amount of neighborhood vegetation and development, the parking deck and helipad would have limited noticeability from the surrounding area. The parking deck and helistop would be partially visible from neighborhoods to the southeast such as from Toro Street, Leff Street, and the San Luis Obispo Train Station area (see Figures 14 and 15). However, from those viewing locations, because of topography, intervening vegetation and development, scenic vistas of the surrounding hills, including the Santa Lucia Foothills would not be affected.

Figure 14. Existing view of the project site as seen from Leff Street near Toro Street looking southeast.

Figure 15. Photo-simulation of the project (with obstruction poles) as seen from Leff Street near Toro Street looking southeast.

Alternative Obstruction Light Poles

If off-site tree pruning is determined to be infeasible, two 125-foot-tall obstruction light poles would be installed at the edge of a large eucalyptus grove southwest of the parking deck and helistop. A secondary effect of the obstruction light poles would be less removal of existing vegetation than the proposed project without poles. Under both development scenarios, some of the existing vegetative mass would be reduced, slightly increasing the potential visibility of the poles from certain viewpoints (see Figure 11). In general, however, the remaining large trees would block or substantially limit visibility of the poles. The proposed light poles would have a thin profile and would occupy a negligible percent of the available visual landscape. As seen from some viewpoints, the light color of the galvanized poles would contrast with the green background of the adjacent trees. Mitigation Measure AES-1 has been identified to require the obstruction light poles to be colored to match the surrounding vegetation if constructed. With implementation of Mitigation Measure AES-1 identified below, the optional obstruction light poles would have a less than significant effect on the surrounding scenic vistas.

Based on the analysis provided above, potential impacts related to scenic vistas would be *less than significant with mitigation*.

b) The project site is located approximately 0.8 mile from U.S. Highway 101 (US 101), which, at this location, is designated as Eligible for listing as a State Scenic Highway. The project site is not visible from any proximate Officially Designated State Scenic Highway. Therefore, *no impacts would occur.*

c) Project related actions would be considered to have a significant impact on the visual character of the site if they altered the area in a way that substantially changed, detracted from, or degraded the visual quality of the site or was inconsistent with City of San Luis Obispo policies regarding visual quality and character. The degree to which that change reflects documented community values and meets viewers' aesthetic expectations is the basis for determining impact significance.

Patient Tower, Parking Deck, and Helistop

Increased development of the project site in terms of the new buildings, parking areas, and other site features would likely be expected by many casual observers. The project's adjacency to the existing hospital and the other medical facilities would add to the public perception that the new buildings and other site features are a logical use for the site.

The proposed patient tower and/or parking deck would be visible to some degree from portions of several nearby streets, including Johnson Avenue, Ella Street, Iris Street, George Street, Leff Street, Toro Street, and others. The project would be seen readily seen from the Terrace Hill Open Space. The patient tower and parking deck would also have the potential to be seen from various other locations throughout the community, although from the more distant viewpoints the buildings would generally have low noticeability and would visually blend with the larger viewshed.

Where seen, the project would be visible as an expansion of the existing site development and would be visually compatible with the architectural style of the existing French Hospital Medical Facility. Specifically, the proposed 68-foot height of the patient tower would not an appear out of scale with the existing facilities and would not have an adverse effect on the existing suburban character and context. Although the proposed patient tower building itself would be taller than the surrounding structures, it would be constructed at a lower ground elevation south of the existing hospital building, such that the top of the proposed patient tower building would actually be slightly lower than the existing Pacific Medical Plaza building. In addition, based on its location, height, or orientation, views to visual resources and scenic vistas such as the Morros and the Santa Lucia foothills would remain intact and would be largely unaffected by the project as seen from most surrounding viewpoints (see discussion under Threshold 1.a, above). Therefore, the proposed patient tower would be consistent with Policy 9.1.5 of the COSE regarding protection of views and visual quality and Policy 9.2.1 and Policy 9.2.2 of the COSE regarding production of views from public places and private development.

Multi-story parking structures are commonly associated with hospital facilities, and the parking deck and helistop would not be uncharacteristic of the existing institutional use. The relatively low profile of the parking deck structure in combination with its proposed location at the western, lower elevation of the site would help visually integrate the structure with the setting.

In general, the proposed architectural concept would be visually appropriate and would help unify the appearance of the site. The general scale and massing of the proposed patient tower and the parking deck/helistop buildings would be visually appropriate as seen with existing development of the hospital facility. Although the proposed additional development would increase visual density, the site and the overall hospital facility would remain compatible with the existing visual character and would have minimal effect on the visual quality of the area, consistent with Policy 9.1.2 of the COSE regarding compatibility with the architectural context of urban development.

Therefore, potential impacts associated with the degradation of visual character resulting from the proposed patient tower, parking deck, and helistop would be *less than significant.*

Tree Removal, Trimming, and Alternative Obstruction Light Poles

If off-site tree pruning is not possible, the project would require the placement of two 125-foot-tall obstruction light poles along the southern perimeter of the project site (see Figure 2). If the obstruction light poles are constructed, the project would result in the removal of 105 trees, and the pruning of 8 trees adjacent to the existing grove of large eucalyptus trees. Although the poles would be seen from certain vantage points in the surrounding area, their thin profiles (25 inches diameter at the base, tapering to 7 inches diameter at the top) and proximity to the large grove of eucalyptus trees reaching approximately 100 to130 feet in height would substantially reduce their noticeability. However, as seen from some viewing directions, the light color of the galvanized poles would contrast with the colors of the background hills and the adjacent trees (see Figure 11). With implementation of Mitigation Measure AES-1 listed below, potential impacts associated with the alternative obstruction light poles would be *less than significant with mitigation.*

Based on the analysis provided above, potential impacts associated with effects on the existing visual character of the project site and its surroundings and consistency with local regulations pertaining to scenic quality would be *less than significant with mitigation.*

d) The project would result in a significant impact if it subjected viewers from public areas or residences to a substantial amount of new night lighting, or if the collective illumination of the project resulted in a noticeable spill-over effect into the nighttime sky, increasing the ambient light over the region.

The existing French Hospital and associated medical facilities include substantial lighting. Parking lot and pedestrian area lighting, external and internal lighting associated with buildings, signage and other uses are seen throughout the facility. Residential street lighting is also found in the adjacent neighborhoods and throughout the surrounding community. Existing additional sources of significant night lighting in the project vicinity are the San Luis Obispo Train Station approximately 500 feet southwest of the project and sports field lighting is associated with San Luis Obispo High School, approximately 0.3 mile north of the project site.

Project Site Lighting

As described in the Project Description, the project would include new lighting throughout the site, including exterior lighting in and around entrances to the patient tower, the parking deck, and generator yard, and along main walkways. Light poles in the vicinity of parking areas would be no more than 20 feet tall. Other lighting on-site would include, but not be limited to, bollard pathway lighting around the drop off entry area in front of the main entrances to the Copeland Health Education Pavilion and patient tower, wall-mounted lights along the exterior of the patient tower to illuminate the exterior dining area and walkways around the building, canopy lights to illuminate the second-floor garden of the patient tower, in-ground lights to illuminate building signage, and aviation lighting as described further below. This project site lighting would be subject to compliance with Zoning Ordinance 17.70.100 *Lighting and Night Sky Preservation*.

Project approval documents would require plans and descriptions of each illuminating device, fixture, lamp, support, and shield, including manufacturer's data, lamp types, lumen outputs and other information. In addition, compliance with the Zoning Regulations would also require the preparation and submittal of photometric plans showing the location of all light poles and building-mounted lighting fixtures and a maximum 10-foot by 10-foot grid of both the initial and maintained lighting levels on the site, including impact on adjacent properties. Per Zoning Code development standards, the photometric study must demonstrate that project site lighting does not exceed a maintained value of 10 foot-candles, when measured at finished grade.

City of San Luis Obispo Community Design Guidelines Section 6.1.c requires that new lighting be cutoff fixtures designed and installed so that no emitted light will break a horizontal plane passing through the lowest point of the fixture and that outdoor lighting shall be fully shielded, recessed, directed downward and not spill onto adjacent properties and public rights-of-way. In addition, parking lot lights are required to not exceed a height of 21 feet above the approved finished grade.

The project would introduce new lighting into the project site, inherent with the expansion of the hospital facility. Based on the existing site lighting located within and around the project site, the location, number, and type of site lighting proposed, and required compliance with Zoning Ordinance 17.70.100 *Lighting and Night Sky Preservation* and Community Design Guidelines Section 6.1.c, proposed site lighting would not result in a substantial amount of new light or glare nor adversely affect daytime or nighttime views in the area; therefore, potential impacts associated with site lighting would be less than significant.

Helistop Lighting

For the purpose of this study, helistop lighting refers to all sources of light associated with the design and function of the helistop, including:

- Helicopter landing lights operated during helicopter approach and landing. Landing light operation would be at the pilot's discretion but lights are anticipated to be turned on when the helicopter is more than 1 mile from the landing site.
- A helistop beacon on the parking deck elevator tower. The beacon would consist of green, white, and yellow LEDs flashing in sequence. Operated only during take-off and landing.
- Green perimeter lights that outlining the touch down and lift-off (TLOF) area. Perimeter lights would also serve to also outline the landing pad for medical crews moving gurneys. Operated only during take-off and landing.
- Red obstruction lights on parking lot elevator tower, patient tower corners, and patient tower roof. Operated only during take-off and landing.
- A lighted wind cone to provide pilots with wind direction and speed information. This wind cone would be located near the northeastern corner of the top floor of the parking deck. Operated only during take-off and landing.
- One beacon and multiple obstruction lights on the patient tower, directed upward. These lights would likely operate from dusk to dawn, year-round.
- Alternative Obstruction Light Poles. If off-site tree pruning is determined to be infeasible, FAA regulations would require the placement of two 125-foot-tall obstruction light poles along the southern perimeter of the project site. The obstruction light poles would have red lights on top and would be operated only during take-off and landing.

According to Zoning Ordinance 17.70.100 *Lighting and Night Sky Preservation, Section F.3*, emergency aviation lighting associated with the project would be exempt from the requirements of that section. The Section F.3 exemption however does not preclude analysis under the California Environmental Quality Act (CEQA).

The helistop structure would include FAA-required lighting. Helistop lighting would operate only during nighttime landings and takeoffs and would be controlled and used by pilots, at their individual discretion, to provide a visual guide. Based on San Luis Obispo County Emergency Service records, the anticipated projected flight frequency is expected to be approximately four helicopter trips per month. County Emergency Service records also show that only approximately 25% of those trips (one trip per month) would occur during the nighttime hours. Preliminary estimates indicate that the amount of time the helipad would be operational for landing, patient care, and takeoff would typically range from twenty minutes to one hour, although these times could vary significantly depending upon patient medical or logistic circumstances. Overflights would be less than five minutes for landing and less than five minutes for takeoff, resulting in a total flight event of approximately 10 minutes during which helipad lighting, including the alternative obstruction poles (if that alternative is ultimately constructed), would be in operation.

Photometric data provided by the project applicant indicates that at eye-level standing on the ground at the property line surrounding the hospital facility, there would be 0 footcandles and light trespass from the helipad lighting, as all light would be directed horizontally and upward from the light fixtures. These fixtures would have cutoff fixtures and would not project light below the horizontal plane. Only viewers at or above the level of the helistop and tower would be able to see the lights. The closest neighbors at or above this level would be located east of Johnson Street, over 850 feet away. According to correspondence with the applicant team, the light from the helipad (including the alternative light obstruction poles) would dissipate and would be unmeasurable past a distance of 320 feet.

All of the required aviation safety lighting would, by design, be highly noticeable to helicopter operators. As described, most of these lights would be used for the helistop perimeter and other structure delineation and would be oriented upward only. This upward orientation would reduce lighting visibility as seen from any lower vantage points; however certain viewpoints in the surrounding community, particularly to the east and south are at elevations higher than the helistop deck. Other lights such as the obstruction pole lighting and beacon lighting would shine in multiple directions.

Because of wide-ranging viewpoint factors such as elevation, orientation, topography, and intervening development, the extent of helistop lighting visibility within the surrounding community would be varied and dispersed throughout the area. However, in general, as seen from much of the surrounding area, intervening mature vegetation (e.g., within the immediately adjacent Open Space Easement north and south of the project site) and surrounding development would block or filter direct views of the new helistop lighting.

In addition, pilot-controlled helistop lighting would only be "on" during nighttime takeoff and landing events which would be limited to approximately 10 minutes per nighttime flight event, and only one nighttime flight event is estimated to occur per month based on County Emergency Services records (see Attachment 9).

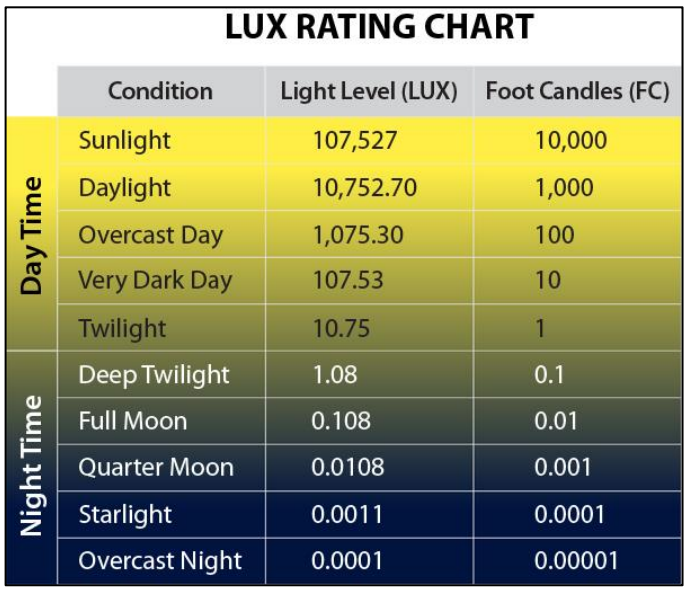
Therefore, based on the limited frequency of operation of helistop lighting and limited visibility of the lighting from surrounding land uses, helistop lighting would not result in the creation of a new substantial source of night lighting and potential impacts would be less than significant.

Helicopter Lighting

In addition to helistop lighting, the helicopters themselves would have lighting. Helicopter landing lights would potentially affect the largest area of the community because those lights could be activated from more than a mile out along the approaching flight path (see Figure 15 of Attachment 2, Visual Impact Assessment of the French Hospital Medical Center Expansion Project). According to preliminary project information and applicable FAA regulations, helicopters would have white landing lights (or search lights) that would light the helistop as they are approaching, similar to the landing lights seen on airplanes when they are approaching a runway at night. Assuming the helicopter's landing light would be mounted at a 45-degree down angle, when the helicopter is level, the search light would produce an approximately 70-foot-diameter cone of light on the ground when the helicopter is 200 feet off the ground, and the search light would produce an approximately 35-foot-diameter cone of light when the helicopter is 100 feet off the ground. Helicopter landing and navigation lights would have a combined light intensity of 80 Lux on the ground when the helicopter is 200 feet above the ground and 320 Lux when the helicopter is 100 feet above the ground. However, based on correspondence with an aviation consultant, it would be unusual for a pilot to use both landing and navigation lights during a typical landing. Pilots would likely only use the landing light solely if used at all, which would result in an intensity of 40 Lux at 200 feet above the ground and 160 Lux at 100 feet above the ground.

For context, 1 Lux is equal to 1 lumen per square meter, and 80 Lux is approximately equal to 7.4 foot candles, which is the light intensity of 7.4 lumens per square foot (Figure 16). Pilots may also elect to use night-vision goggles during landings in relatively dark environments, in which case neither landing nor navigation lights would be used. This would be based on pilot discretion.

Figure 16. Lighting Intensity Comparison Chart.



LUX RATING CHART

	Condition	Light Level (LUX)	Foot Candles (FC)
Day Time	Sunlight	107,527	10,000
	Daylight	10,752.70	1,000
	Overcast Day	1,075.30	100
	Very Dark Day	107.53	10
	Twilight	10.75	1
Night Time	Deep Twilight	1.08	0.1
	Full Moon	0.108	0.01
	Quarter Moon	0.0108	0.001
	Starlight	0.0011	0.0001
	Overcast Night	0.0001	0.00001

Source: Tachyonlight.com

Although helicopter-related lighting would be seen to some degree from much of the surrounding area, the expected low frequency (approximately one nighttime use per month) and short-term duration of helistop operations (estimated up to ten minutes for landing and takeoff) would substantially limit the potential adverse effect on the adjacent neighborhood and surrounding community. Therefore, potential impacts would be *less than significant*.

Mitigation Measures

AES-1 If obstruction light poles are proposed, prior to issuance of construction permits, the project applicant shall submit final design plans demonstrating the obstruction light poles would be colored a muted grey-green color in order to blend in with the foliage of the adjacent eucalyptus grove.

Conclusion

Although the project would be seen to some degree from certain areas within the surrounding neighborhoods, its scale, architectural and site design, and landscaping would be visually compatible with the surrounding suburban setting and would likely be consistent with the viewers' expectations for the site. Lighting impacts associated with nighttime use of the helipad would be infrequent and of short duration. Mitigation has been identified to reduce potential impacts associated with aesthetics to less than significant with mitigation.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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:

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?	6	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	2, 7	☐	☐	☐	☒
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))?	2, 7	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	1, 2, 8	☐	☐	☒	☐
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?	1, 2	☐	☐	☒	☐

Evaluation

The California Department of Conservation (DOC) classifies and maps agricultural lands in the state in the Farmland Mapping and Monitoring Program (FMMP). The FMMP identifies five farmland categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential. The project site is designated as Urban and Built-Up Land by the FMMP (source reference 6).

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

a) The project site is designated as Urban and Built-Up Land by the FMMP. The proposed project site is not in agricultural use and is not located on lands designated as Farmland by the FMMP. Therefore, the project would not result in the conversion of Farmland pursuant to the FMMP to non-agricultural use; therefore, *no impacts would occur.*

b) The project site is currently zoned Office (O). The project site is not located within an Agricultural Zone, and based on the City COSE, the project site is not located within or immediately adjacent to land under an active Williamson Act Contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and *no impacts* would occur.

c) The project site does not include land use designations or zoning for forest land or timberland. Therefore, the project would not conflict with zoning for forest land or timberland and *no impacts* would occur.

d) The project would require removal of landscaped trees currently located within the proposed footprint of the patient tower, parking deck, generator yard, and realigned site driveway. These tree removals would include shade trees located along existing parking areas, planted trees located around existing building facilities, and both native and non-native trees located within the 0.11-acre area proposed to be removed from the existing open space easement. In addition, eight eucalyptus trees within the immediate project vicinity would need to be trimmed to meet FAA standards to accommodate the flightpath of helicopters using the proposed helistop.

Landscaped trees currently located within existing parking areas within proposed building footprints would not meet the criteria for forest land as defined by the PRC due to having less than 10% native tree cover. Proposed tree removal would include removal of a total of 21 coast live oak trees within existing developed areas and within the 0.11-acre area proposed to be removed from the existing open space easement. Proposed tree removal and trimming of non-native eucalyptus trees would not constitute conversion of forest land due to the majority of tree removals occurring within developed areas and existing woodland areas on-site would not be converted to a different use. In approving the project permit application for tree removal, the proposed landscaping plan would be evaluated for consistency with the City compensatory planting policy and city engineering standards as set forth in the Municipal Code, which require compensatory plantings of trees to offset the loss of trees removed. Therefore, the project would not result in a loss or conversion of forest land and potential impacts associated with the conversion or loss of forest land or timberland would be *less than significant*.

e) The project includes construction of a new parking structure, helistop, generator yard, and patient tower on an existing developed hospital campus and therefore would not result in substantial changes in the environment that could result in conversion of any surrounding agricultural land or forest land. There are no agricultural or forest lands within proximity of the project that could be substantially indirectly affected by project development, such as through construction-related dust. Similarly, there are no proximate agricultural or forest lands that would be potentially affected by operational effects such as water usage or land use patterns or changes. Therefore, the project would not result in changes in the existing environment that could result in conversion of forest land to non-forest use and *potential impacts would be less than significant*.

Mitigation Measures

None necessary.

Conclusion

The project site is located in an urbanized area and is not within or adjacent to Prime Farmland, land zoned for agricultural or forest land use, or land under a Williamson Act Contract. No potentially significant impacts to agriculture or forest land would occur, and no mitigation is necessary.

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:

a) Conflict with or obstruct implementation of the applicable air quality plan?	11	☐	☒	☐	☐
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?	9, 11	☐	☐	☒	☐

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	10, 11	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	1, 11	☐	☐	☒	☐

Evaluation

The city of San Luis Obispo is located within the South-Central Coast Air Basin (SCCAB), which also includes Santa Barbara and Ventura Counties. Air quality within the SCCAB is regulated by several jurisdictions including the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and SLOAPCD.

For the protection of public health and welfare, the Clean Air Act (CAA) required that the USEPA establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants because the US EPA publishes criteria documents to justify the choice of standards. These standards define the maximum amount of an air pollutant that can be present in ambient air without harm to the public's health.

San Luis Obispo County is currently designated as "non-attainment" for the state standards for ground-level ozone, partial nonattainment for federal ambient standards for ground-level ozone, and nonattainment for the state standards for particulate matter 10 microns in diameter or smaller (PM_{10}; source reference 9). Air pollutants that create ozone when combined in the air are called ozone precursors, and these include reactive organic gases (ROG) and nitrogen oxides (NO_x). The City 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 encouraging walking, biking, and public transit use.

The SLOAPCD's 2001 Clean Air Plan (2001 CAP) addresses the attainment and maintenance of state and federal ambient air quality standards. The 2001 CAP outlines the SLOAPCD's strategies to reduce ozone-precursor pollutants (i.e., ROG and NO_x) from a wide variety of sources. The 2001 CAP includes a stationary-source control program, which includes control measures for permitted stationary sources, as well as transportation and land use management strategies to reduce motor vehicle emissions and use. The stationary-source control program is administered by SLOAPCD. Transportation and land use control measures are implemented at the local or regional level by promoting and facilitating the use of alternative transportation options, increased pedestrian access and accessibility to community services and local destinations, reductions in vehicle miles traveled, and promotion of congestion management efforts.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The 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 project site is located within 1,000 feet of multiple sensitive receptors, including residential uses located directly north, south, and east of the project site.

Asbestos is the common name for a group of naturally occurring fibrous silicate minerals that can separate into thin but strong and durable fibers. Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant (TAC) by the CARB. Any ground disturbance proposed in an area identified as having the potential to contain NOA must comply with the CARB Airborne Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations. The SLOAPCD Naturally Occurring Asbestos Map indicates that the project site is located within an area identified as having a potential for NOA to occur (source reference 10). Asbestos-containing materials may also be present in existing structures. The demolition of existing structures may be subject to regulatory requirements for the control of asbestos-containing materials (ACM).

The 1993 FHMP MND identified a potentially significant impact associated with emissions of fugitive dust during construction and grading activities and identified mitigation to require watering of graded surfaces and stockpiles, cessation of grading activities during periods of winds over 25 miles per hour, and other dust-control measures to be implemented during construction. The 1993 FHMP MND also concluded that increased traffic associated with planned facilities would incrementally increase the

pollutants in the air resulting in a cumulatively significant but mitigatable impact. Mitigation was identified to require provision of bicycle storage lockers for the office portions of the facilities, provision of showers and lockers for on-site employees, identification of preferential parking spaces for employees who carpool, and expansion of an incentive program to include employees who bicycle or walk to work.

a) In order to be considered consistent with the 2001 CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP. Table 2 below provides an analysis of the project's consistency with the land use planning and transportation control measures outlined in the 2001 CAP.

Table 2. Project Consistency with 2001 CAP Transportation and Land Use Control Measures

Control Measures	Project Consistency
Land Use Planning Strategies	
L-3 Balancing Jobs and Housing. Within cities and unincorporated communities, the gap between the availability of jobs and housing should be narrowed and should not be allowed to expand.	**Consistent with Mitigation Incorporated.** The proposed project is located within the City's urban reserve lines and would not result in the development of residential land uses. The project would, however, result in the creation of approximately 45 new jobs, which would exacerbate the current gap between jobs and housing in the city. Implementation of Mitigation Measure ENG-1 would require the preparation of a Transportation Demand Management (TDM) Plan, which would include measures for reducing project-generated vehicle miles traveled (VMT). Other measures, such as Mitigation Measure ENG-2 would require additional measures to reduce operational emissions, including the installation of bicycle storage in excess of current building code requirements.
Transportation Control Measures	
T-2B Regional Public Transit Improvements. The goal of this measure is to improve transit service and facilities that will promote increased public transit use instead of a private automobile.	**Consistent with Mitigation Incorporated**. • Transit service is provided along Johnson Avenue by SLO Transit via Route 1A/1B. • The project site and proposed expansion supports the use of bicycle and pedestrian activity. Sidewalks are provided adjacent to and onto the site. A trail exists along the property that connects Breck Street to Iris Street. The project proposes to maintain the high level of bicycle and pedestrian accommodation. • Bicycle lanes currently existing along Johnson Avenue. Bicycle accommodations on-site are provided via the shared travel ways and the trail that extends through the site from Breck Street to Iris Street. • Mitigation Measure ENG-1 would require the preparation of a TDM plan which would include additional measures for reducing project-generated VMT (see Section 8, Greenhouse Gas Emissions). • Mitigation Measure ENG-2 would require additional measures to reduce operational emissions, including the installation of bicycle storage in excess of current building code requirements (see Section 8, Greenhouse Gas Emissions).
T-3 Bicycling and Bikeway Enhancements. The goal of this measure is to encourage a modal shift to bicycles through implementation of infrastructure improvements and administrative actions that provide inexpensive commute options and increased safety and convenience for commuters.	
T-8 Teleworking, Teleconferencing, and Telelearning. The objective of this measure is to reduce the number of trips and miles traveled by employees and students by promoting teleworking, tele-conferencing and telelearning.	

The 2001 CAP also includes projected population, employment, and vehicle miles traveled (VMT) growth for the region. According to the Regional Housing Needs Assessment (RHNA), the city of San Luis Obispo has about 61% more jobs than housing units, indicative of a "jobs-rich" community. The City's jobs-to-housing ratio is estimated to increase from a year 2015 ratio of 1.61 jobs/housing to a ratio of 1.82 jobs/housing by year 2030. The proposed project would result in increased employment and would not result in an increase in housing. As a result, the proposed project could exacerbate the existing jobs-housing imbalance of the city of San Luis Obispo. In addition, the proposed project is projected to result in an overall increase in regional VMT (see Section 17, Transportation, Threshold 17.b). Accordingly, the project would conflict with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the 2001 CAP.

Mitigation Measures AQ-1 through AQ-3 have been identified to include SLOAPCD-recommended measures for the control of construction-generated emissions, including emissions of particulate matter. In addition, Mitigation Measure ENG-1 in Section 6, *Energy* would require the preparation of a Transportation Demand Management plan, which would include measures to reduce the project's overall VMT to below City thresholds. Implementation of Mitigation Measure ENG-2 would include additional mitigation measures that would further reduce project-related operational emissions. With implementation of these measures, the project would not conflict with regional air quality planning efforts and potential impacts would be *less than significant with mitigation.*

b) San Luis Obispo County is currently designated as "non-attainment" for the state standards for ground-level ozone, partial nonattainment for federal ambient standards for ground-level ozone, and nonattainment for the state standards for PM_{10}.

Short-term Construction Emissions

Construction of the proposed project would result in the temporary generation of emissions associated with site grading and excavation, paving, motor vehicle exhaust associated with construction equipment and worker trips, as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_x) and emissions of particulate matter. Emissions of ozone precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses.

Emissions associated with the construction of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), version 2020.4.0 computer program (source reference 11). Estimated maximum daily and quarterly emissions associated with construction of the proposed project are presented in Table 3 and Table 4, respectively.

Table 3. Daily Construction Emissions Without Mitigation

Construction Year	Maximum Daily Emissions (lbs/day)[1]	
	ROG+NO_x	**Exhaust PM_{10}**
2022	59.3	2.6
2023	36.1	1.4
2024	32.0	0.7
Maximum Daily Emissions	59.3	2.6
SLOAPCD Daily Thresholds	**137**	**7**
Exceed SLOAPCD Thresholds?	No	No

Note: lbs = pounds

[1] Maximum Daily Emissions (includes on-site and off-site emissions): Assumes that multiple construction activities could potentially occur simultaneously on any given day. To be conservative, exhaust PM10 emissions were compared to SLOAPCD's diesel-exhaust particulate matter (DPM) threshold. Totals may not sum due to rounding. See Appendix C of Attachment 2 for modeling assumptions and results.

Table 4. Quarterly Construction Emissions Without Mitigation

Quarter	Maximum Quarterly Emissions (tons)[1]			
		PM_{10}[2]		
	$ROG+NO_x$	Fugitive	Exhaust	Total
Year 2022 - Quarter 3	0.81	0.09	0.02	0.11
Year 2022 - Quarter 4	0.60	0.02	0.00	0.02
Year 2023 - Quarter 1	0.54	0.02	0.00	0.02
Year 2023 - Quarter 2	0.55	0.02	0.00	0.02
Year 2023 - Quarter 3	0.74	0.13	0.02	0.15
Year 2023 - Quarter 4	0.65	0.02	0.00	0.02
Year 2024 - Quarter 1	1.00	0.02	0.00	0.02
Year 2024 - Quarter 2	1.10	0.02	0.00	0.02
Year 2024 - Quarter 3	0.01	0.00	0.00	0.00
SLOAPCD Quarterly Tier 1/Tier 2 Thresholds (tons/quarter)	**2.5/6.3**	**2.5/None**	**0.13/0.32**	**None**
Maximum Quarterly Emissions	1.10	0.13	0.02	0.15
Exceeds SLOAPCD Tier 1/Tier 2 Thresholds?	No/No	No/NA	No/No	NA

[1] *Maximum Quarterly Emissions (includes on-site and off-site emissions): Assumes that facility construction, paving, and application of architectural coatings could potentially occur simultaneously on any given day. To be conservative, total exhaust PM10 emissions were compared to SLOAPCD's diesel-exhaust particulate matter (DPM) threshold. Totals may not sum due to rounding. Refer to Appendix C of Attachment 3 for modeling assumptions and results.*

NA=Not Applicable

Maximum daily and quarterly construction emissions of $ROG+NO_x$ would not exceed SLOAPCD's daily, quarterly Tier 1, or quarterly Tier 2 significance thresholds. Emissions would be largely a result of mobile-source emissions associated with construction vehicle and equipment operations anticipated to occur during the building construction phase. Estimated emissions of fugitive particulate matter and diesel-exhaust particulate matter (DPM) would, likewise, not exceed SLOAPCD's significance thresholds. Therefore, construction emissions would not result in a cumulatively considerable net increase in pollutants for which the region is in non-attainment and impacts would be *less than significant.*

Long-term Operational Emissions

Long-term operational emissions associated with the proposed project would be predominantly associated with mobile sources. To a lesser extent, emissions associated with area sources, such as landscape maintenance activities as well as use of electricity and natural gas would also contribute to increased operational emissions. Operational emissions associated with the proposed project are summarized in Table 5. As depicted, maximum daily operational emissions (excluding the operation of proposed onsite emergency generators) would total approximately 12.9 pounds (lbs)/day of $ROG+NO_x$, 30.6 lbs/day of carbon monoxide, 6.0 lbs/day of fugitive PM_{10}, and 0.3 lbs/day of exhaust PM_{10}. Estimated daily and annual operational emissions would not exceed SLOAPCD's recommended significance thresholds. In addition, implementation of Mitigation Measures ENG-1 and ENG-2 would result in further reductions in operational emissions of criteria air pollutants. The project's operational emissions would not exceed SLOAPCD significance thresholds; therefore, operational emissions would not result in a cumulatively considerable net increase in pollutants for which the region is in non-attainment and impacts would be *less than significant*.

Table 5. Operational Emissions Without Mitigation

Operational Period/Source	Emissions[1]						
	ROG	NO_x	ROG+ NO_x	CO	PM_{10}		
					Fugitive	Exhaust[2]	Total
Daily Emissions (lbs/day)							
Area Source	2.5	0.0	2.5	0.0	0.0	0.0	0.0
Energy Use	0.3	2.6	2.9	2.2	0.0	0.2	0.2
Mobile with Existing Transportation Demand Management (TDM) Strategies[4]	3.1	4.4	7.5	28.4	6.0	0.1	6.1
Stationary Sources-Emergency Generators[5]	27.6	70.3	97.9	2.9	0.0	2.0	2.0
SLOAPCD Significance Thresholds[6]	**--**	**--**	**25**	**550**	**25**	**1.25[3]**	**--**
Total Project Emissions without Stationary Sources	5.9	7.0	12.9	30.6	6.0	0.3	6.3
Exceeds SLOAPCD Thresholds?	--	--	No	No	No	No	--
Annual Emissions (tons/year)							
Total Project Emissions	1.2	2.2	3.4	2.0	0.1	0.1	0.2
SLOAPCD Significance Thresholds	--	--	25	--	25	--	--
Exceeds SLOAPCD Thresholds?	--	--	No	--	No	--	--

[1] Emissions quantified using CalEEMod, v2020.4.0. Totals may not sum due to rounding. Refer to Appendix C of Attachment 3 for modeling output files and assumptions.

[2] Includes PM exhaust emissions for diesel- and gasoline-fueled vehicles. Emissions associated with stationary sources includes the installation to two emergency generators which would be projected to exceed SLOAPCD's on-site significance threshold of 1.25 lbs/day.

[3] The SLOAPCD-recommended DPM significance threshold applies to on-site emission sources.

[4] Includes existing TDM strategies currently implemented, which are estimated to result in reductions in VMT of 6.625% (source reference 53).

[5] Assumes the operation of two diesel-fueled 1,050 hp generators 8-hours/day; annual emissions assumes operation up to 100 hours/year for maintenance and testing purposes in accordance with SLOAPCD Rule 431 operational limitations. Permitted stationary source emissions are provided for informational purposes.

[6] Includes area source, energy use, and mobile-source emissions. Does not include emissions associated with permitted stationary sources.

c) The proposed project would result in localized increases of pollutant concentrations during project construction and long-term operation. The proposed project's potential contribution to localized air pollutants is discussed below.

Localized NO_x, ROG, DPM, and PM Concentrations

Fugitive dust emissions would be primarily associated with building demolition, site preparation, grading, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. Mitigation Measures AQ-1 through AQ-3 have been identified to reduce construction generated NO_x, ROG, DPM, and fugitive dust. With implementation of these measures, potential impacts associated with exposure of sensitive receptors to substantial concentrations of these pollutants would be reduced to less than significant.

Naturally Occurring Asbestos and Asbestos-Containing Materials

Based on a review of the SLOAPCD's map depicting potential areas of NOA, the project site is located in an area that has been identified as having a potential for NOA. Mitigation Measure AQ-4 has been identified to require a geologic evaluation be conducted prior to ground disturbance activities to determine if NOA is present within the area that would

be disturbed. If NOA is present, the applicant shall comply with all requirements outlined in the CARB Air Toxics Control Measures associated with NOA. Upon implementation of AQ-4, potential impacts associated with NOA would be reduced to less than significant.

Demolition activities can have potential negative air quality impacts, including issues surrounding the proper handling, demolition, and disposal of ACM, which could be encountered during the demolition of existing paved areas. Mitigation Measure AQ-4 has been identified to require full compliance with the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 Code of Federal Regulations [CFR] 61, Subpart M, Asbestos NESHAP). These requirements include but are not limited to: (1) notification, within at least 10 business days of activities commencing, to the SLOAPCD; (2) an asbestos survey conducted by a Certified Asbestos Consultant; and (3) applicable removal and disposal requirements of identified ACM. Upon implementation of Mitigation Measure AQ-4, potential impacts associated with ACM would be reduced to less than significant.

Lead-Coated Materials

Demolition of existing pavement may contain lead-based paint and therefore could have potential negative air quality impacts and may adversely affect the health of nearby individuals. Improper demolition of existing paved areas on-site could result in the release of lead-containing particles from the site. In such instances, proper abatement of lead before demolition of these structures must be performed in order to prevent the release of lead from the site. Depending on the removal method, a SLOAPCD permit may be required. Mitigation Measure AQ-4 has been identified to require evaluation of paint waste if paint is separated from the construction materials during demolition activities and compliance with applicable state and local disposal protocol if lead-based paint is detected. Upon implementation of this measure, potential impacts would be less than significant.

Localized CO Concentrations

Localized concentrations of CO are of primary concern in areas located near congested roadway intersections. Of particular concern are signalized intersections that are projected to operate at unacceptable levels of service (LOS) E or F. With implementation of the proposed project, signalized intersections primarily affected by the proposed project would operate at LOS D, or better. As a result, implementation of the proposed project is not anticipated to contribute to localized carbon monoxide concentrations that would exceed applicable ambient air quality standards and potential impacts would be less than significant.

Toxic Air Contaminants

The proposed project would include the installation of two approximately 1,050 horsepower diesel-fueled emergency generators. The specific generators to be installed have not yet been identified. Emissions of primary concern with diesel-fueled engines are predominantly associated with DPM. The emergency generators would operate on an occasional basis for routine maintenance and testing and on an emergency basis during electrical outages. Based on the modeling conducted, the emergency generators would emit approximately 25.3 lbs/year of DPM, assuming an operational period of 100 hours/year based on permit limitations.

A screening-level health risk assessment was conducted for purpose of evaluating potential acute and chronic health risks associated with the proposed emergency generators. For the nearest off-site receptors, as well as on-site receptors (e.g., patients and staff), operation of the proposed generators would result in a combined cancer risk score of 58.2 in one million, which would be considered to have a high potential for cancer risk in excess of SLOAPCD's significance threshold of 10 in one million. It is important to note, however, that the proposed emergency generators would be subject to SLOAPCD permitting requirements for stationary emission sources. The SLOAPCD requires implementation of best available control technology for sources of TACs, sufficient to reduce operational emissions to below applicable thresholds. An authority to construction or a permit to operate would not be issued by the SLOAPCD unless emissions were reduced below applicable thresholds. Therefore, through required compliance with existing regulatory requirements, this impact would be *less than significant.*

Based on the analysis provide above, potential impacts associated with exposure of sensitive receptors to substantial concentrations of pollutants would be *less than significant with mitigation.*

d) The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose members of the public to objectionable odors would be deemed to have a significant impact.

The proposed project would not result in the installation of any equipment or processes that would be considered major odor-emission sources. However, construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly with increasing distance from the source. Therefore, neither proposed operational nor construction activities would expose a substantial number of people to frequent odorous emissions and impacts would be *less than significant.*

Mitigation Measures

Implement Mitigation Measures ENG-1 and ENG-2.

AQ-1 The following SLOAPCD-recommended *Standard Mitigation Measures* shall be implemented to reduce construction generated NO_x, ROG, and DPM.

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel-powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. Diesel-fueled construction equipment shall meet, at a minimum, CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines and comply with the State Off-Road Regulation. Off-road equipment meeting CARB's Tier 3 and Tier 4 emission standards should be used, to the extent locally available;
4. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
5. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle when equipment is not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the idling restrictions;
7. Equipment staging and queuing areas shall be located at the maximum distance feasible from sensitive receptor locations. Signs shall be posted identifying these areas;
8. Electrify equipment when possible;
9. Substitute gasoline-powered in place of diesel-powered equipment, where possible;
10. Use alternative-fueled construction equipment on-site where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel; and
11. The contractor or builder shall designate a person or persons to monitor the implementation of the measures detailed above. Signage on-site shall be provided near project site entrances that detail the name and telephone number of the on-site monitor. The monitor shall be responsible for fielding questions and addressing concerns received from the public on an as-needed basis. Significant concerns shall be relayed to City Planning and Building staff.

AQ-2 The following SLOAPCD-recommended mitigation measures shall be implemented to reduce construction generated fugitive dust. These measures shall be shown on grading and building plans.

1. Reduce the amount of disturbed area where possible.
2. Use water trucks, SLOAPCD-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.
3. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.
4. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
5. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
6. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code Section 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a "track-out prevention device" where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track-out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.
7. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;
8. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
9. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
10. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.
11. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust off-site. Their duties shall include

holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

AQ-3 The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (NO_x, ROG, and DPM) and area sources. These measures shall be shown on grading and building plans:

1. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the CARB) or be permitted by the SLOAPCD. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
2. Construction of the proposed project shall use low-VOC content paints not exceeding 50 grams per liter.
3. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
4. Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment:
    a. Staging and queuing areas shall be located at the greatest distance feasible from sensitive receptor locations;
    b. Diesel idling when equipment is not in use is not permitted;
    c. Use of alternative fueled equipment is recommended whenever possible; and,
    d. Signs that specify the no-idling requirements must be posted and enforced at the construction site.
5. Idling Restrictions for On-road Vehicles. Section 2485 of Title 13, the California Code of Regulations (CCR) limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
    a. Shall not idle the vehicle's primary diesel engine when vehicle is not in use, except as noted in Subsection (d) of the regulation; and,
    b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.
    c. Signs must be posted in the designated queuing areas and job sites to remind drivers of the no-idling requirement. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.
6. Idling Restrictions for off-Road Equipment. Off-road diesel equipment shall comply with the idling restriction identified in the Idling Restrictions for On-road Vehicles detailed above. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the no-idling requirement.

AQ-4 The following mitigation measures shall be implemented to reduce the disturbance of asbestos and lead. Strategies include but are not limited to the following:

1. Demolition of on-site structures shall comply with the National Emission Standards for Hazardous Air Emissions requirements (40 CFR 61, Subpart M, Asbestos NESHAP) for the demolition of existing structures. The SLOAPCD is delegated authority by the Environmental Protection Agency (EPA) to implement the Federal Asbestos NESHAP. Prior to demolition of on-site structures, the SLOAPCD shall

be notified, per NESHAP requirements. The SLOAPCD notification form and reporting requirements are included in Appendix A of the Air Quality and Greenhouse Gas Impact Assessment for the Proposed French Hospital Medical Center Expansion Project (Attachment 3). Additional information may be obtained at website URL: https://www.slocleanair.org/rules-regulations/asbestos/complaints-resources.php.

2. If during the demolition of existing structures, paint is separated from the construction materials (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state and federal regulations. According to the Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Contact the SLOAPCD Enforcement Division at (805) 781-5912 for more information. Approval of a lead work plan and permit may be required. Lead work plans, if required, shall be submitted to SLOAPCD ten days prior to the start of demolition.

3. Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos (NOA) is present within the area that would be disturbed. If NOA is not present, an exemption request must be filed with the SLOAPCD. If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM. These requirements may include but are not limited to:

    a. Development of an Asbestos Dust Mitigation Plan which must be approved by the SLOAPCD before operations begin, and

    b. Development and approval of an Asbestos Health and Safety Program (required for some projects).

Conclusion

The project would have the potential to result in inconsistencies with regional air quality planning efforts and emissions that may expose nearby sensitive receptors to substantial pollutant concentrations. With implementation of mitigation measures identified above, potential impacts associated with air quality would be less than significant with mitigation incorporated.

4. BIOLOGICAL RESOURCES

Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 2, 12, 14, 16, 57	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 2, 15, 57	☐	☒	☐	☐
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?	15	☐	☒	☐	☐

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	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?	2, 16, 57	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	2, 12, 18	☐	☒	☐	☐
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?	2	☐	☐	☐	☒

Evaluation

The project site is located within a developed area of the city of San Luis Obispo, surrounded by moderately dense residential development, a railroad, and public school facilities. The project site currently supports existing hospital and medical office uses, paved and landscaped parking areas, and an approximately 3.6-acre open space easement that supports densely vegetated areas, two riparian corridors, and a bike path. The area that would be disturbed by project development is almost entirely paved, with the exception of the 0.11-acre area proposed to be removed from the existing open space easement. The open space easement supports clusters of eucalyptus trees, native oak trees, and other vegetation, a creek that traverses the southern portion of the property, and a creek that traverses the northern portion of the property.

The city of San Luis Obispo is generally surrounded by open rangeland used for grazing and other agricultural uses and open space areas that support a variety of natural habitats and plant communities. The city's many creeks provide sheltered corridors that allow local wildlife to move between habitats and open space areas. The City COSE identifies various goals and policies to maintain, enhance, and protect natural communities within the City planning area. These policies include, but are not limited to, protection of listed species and species of special concern, preservation of existing wildlife corridors, protection of significant trees, and maintaining development setbacks from creeks.

The City's Tree Ordinance (Municipal Code Chapter 12.24) was adopted in 2010 and updated in 2019 with the purpose of establishing a comprehensive program for installing, maintaining, and preserving trees within the city. This ordinance includes policies that encourage preservation of trees whenever possible and feasible, detail the procedure and requirements for acquisition of a permit for tree removal within the city, and identify application requirements for tree removals associated with development permits. The City's Tree Ordinance requires planting of a minimum of one new tree for each tree authorized to be removed when planted on the same property or two new trees for each tree authorized to be removed when planted on a different property or within the public right-of-way (off site) (source reference 12). The City has also established a Heritage Tree Program which protects Heritage trees throughout the city designated by the Tree Committee and City Council. Based on the City's GIS Division Heritage Trees map, no heritage trees are located within the project site (source reference 13).

The 1993 FHMP MND included a survey of on-site plant communities and identified eucalyptus canopy with native plants including toyon, arroyo willows, poison oak, and coast live oak within the existing open space easement. Eucalyptus trees were also identified as dominant in the creek located on the southwest portion of the property with groupings of coast live oak trees. No rare, endangered, or sensitive plants were found in the areas surveyed.

a) The area proposed for project development is almost entirely paved, except for the 0.11-acre area proposed to be removed from the existing open space easement (see Figure 8). The proposed patient tower and parking deck would be located within existing paved areas. Installation of the two obstruction light poles (if this alternative is ultimately constructed), proposed tree trimming, pruning, and removal, compaction, paving, and placement of a portion of the proposed generator yard would occur within the 0.11-acre area of the open space easement.

   The open space easement area that would be developed consists of disturbed areas with planted oak trees (see Figure 17) and a fenced riparian woodland area dominated by eucalyptus trees (see Figure 18). Due to the developed and disturbed

nature of the project site and the heavy leaf litter and bark debris from the eucalyptus trees within the vegetated areas on-site, the project site does not support suitable habitat for special status plant species.

Figure 17. Photograph of an eastern portion of the open space easement area facing north (November 11, 2021).

Figure 18. Photograph of a southern portion of the open space easement facing north (November 11. 2021).

Trees and vegetation located within the existing open space easement may provide suitable habitat for special status birds and nesting birds protected under the Migratory Bird Treaty Act (MBTA) and/or Fish and Game Code. If vegetation removal occurs during the nesting bird season (February 15 through September 15), proposed vegetation removal and trimming would have the potential to impact nesting birds. Direct impacts to nesting birds may include physical removal of active nests resulting in the destruction of the nest, eggs, and/or chicks. Indirect impacts could result from noise disturbance that may prompt an adult bird to abandon the nest.

Mitigation Measure BR-1 has been identified to require vegetation removal be scheduled outside of the nesting bird season. If conducting vegetation removal outside the nesting bird season is infeasible, a preconstruction survey shall be conducted to determine the presence/absence of nesting birds within the disturbance areas. If active nests are observed within proximity to proposed vegetation removal activities, no vegetation removal shall occur within the appropriate buffer based on the type of bird nest until young birds have fledged and left the nest. Upon implementation of BR-1, potential impacts to special status birds and nesting birds protected under the MBTA would be less than significant.

The project would include removal of 8 eucalyptus trees and trimming of 8 eucalyptus trees located within the proposed helicopter flight path to meet FAA regulations for use of the helistop, all of which are located within the open space easement. Eucalyptus trees located within the existing open space easement could support overwintering habitat for monarch butterfly, which is included in the CDFW Terrestrial and Vernal Pool Invertebrates of Conservation Priority List and is a U.S. Endangered Species Act candidate species. If monarchs are overwintering in a tree to be removed or trimmed, the monarchs could be directly impacted by the tree removal. Mitigation Measure BR-2 has been identified to require a preconstruction survey for monarch butterflies if tree removal is scheduled during the fall or winter monarch butterfly migration season. If monarch butterflies are detected to be overwintering in the work area or within 300 feet of the work area, tree removal shall be postponed until a qualified biologist determines monarch butterflies are no longer utilizing the trees on-site or within 300 feet of the work site for overwintering. Direct impacts to individual monarch butterflies are not anticipated due to the mobility of individuals to easily move away from project activities. The project site is not located within or adjacent to a priority monarch butterfly overwintering site designated by the Xerces Society; therefore, no long-term impacts associated with habitat removal would occur. Upon implementation of BR-2, potential impacts to monarch butterfly would be less than significant.

Ongoing operation and use of the proposed patient tower, parking deck, and helistop would not significantly affect on-site habitats. The proposed helistop would introduce an additional source of periodic loud noise in the project vicinity; however, the project would not result in a significant increase in ambient noise levels due to existing noise sources in the area (see Section 13, Noise, for more detailed analysis). Therefore, with implementation of measures BR-1 and BR-2, potential impacts associated with substantial adverse effects on special status species would be *less than significant with mitigation*.

b) Certain areas of the project site support dense vegetation and some site disturbance activities would occur within proximity to the creek located within the southwest portion of the project site within the existing open space easement.

Due to the proximity of proposed development activities to densely vegetated areas located on-site, the project would have the potential to result in indirect impacts to native plant life and natural habitats. The 1993 FHMP MND identified potentially significant but mitigatable indirect impacts associated with project effects on native plant life and included mitigation requiring protective fencing to be installed prior to, and maintained in place until conclusion of, grading and development of parking lot areas to prevent excess soil from sloughing off into the existing creek located on the southwest portion of the site. Mitigation Measure BR-3 has been identified to require installation of silt fencing and erosion control measures adjacent to riparian habitat areas.

The 1993 FHMP MND also identified mitigation to maintain the heavily wooded portions of the property as permanent open space easements. The existing open space easement agreement was established in 2015 to preserve the open space easement area's natural resource values, including streams, nesting bird habitat, and monarch butterfly overwintering habitat as well as to enable the City to coordinate with French Hospital to maintain the existing public drainage improvements and allow for future public drainage improvements, maintenance, or upgrades as needed. The project would modify the boundaries of the existing open space easement on-site to allow development of proposed structures without reducing the overall area of the easement. An 0.11-acre area of the existing open space easement would be removed from

the easement area to allow for the construction of the proposed generator yard and additional surface parking, and a 0.17-acre area north of the existing open spaces area would be added to the open space easement. While the net area of the open space easement would not be reduced, a portion of the open space easement that was designated for permanent preservation would be impacted by proposed development and would result in a conflict with the original intent of the open space easement agreement.

The existing open space easement agreement states that French Hospital shall coordinate with the City to clear debris, trash, and hazardous conditions from the easement area, maintain the easement area via trimming, limbing, and removal of vegetation and trees as appropriate, install and maintain perimeter fencing, and that French Hospital's contract security personnel will periodically patrol the easement area for safety and security of the easement area (in coordination with the City Police Department, as necessary). Historically, the easement area has generally been left "as is" and has not been regularly maintained and patrolled consistent with the conditions of the open space easement. Development within the 0.11-acre area to be removed from the easement would further conflict with conditions of the easement. The additional proposed development would also potentially increase the potential for trash, debris, trespass, and/or other disturbances to occur within the easement area, in conflict with the terms and purpose of the easement agreement. Mitigation Measure BR-4 has been identified to require preparation of annual survey reports documenting the conditions of the open space easement area and identifying any and all necessary improvements or maintenance activities needed to comply with the original terms of the easement. Upon implementation of Mitigation Measure BR-4, impacts associated with modification of the open space easement would be reduced to less than significant.

The project would result in the trimming of non-native eucalyptus trees and potential installation of an obstruction light pole within the riparian corridor of the creek. Therefore, if this alternative project component is ultimately constructed, the project would be required by law to attain a Lake and Streambed Alteration Agreement (LSAA) from the California Department of Fish and Wildlife (CDFW). The LSAA may include a variety of measures to avoid and minimize impacts, including at minimum, the requirements identified in Mitigation Measure BR-5. With implementation of Mitigation Measure BR-5, potential impacts to the on-site riparian habitat would be reduced to less than significant.

Proposed project grading, tree removals, and excavation activities may have the potential to result in increased soil erosion and/or siltation that may affect proximate native riparian habitat areas. Mitigation Measures BR-6 through BR-9 have been identified to require preparation of a hazardous materials response plan, monitoring of erosion control measures, setback distances for equipment refueling, and trash collection to prevent impacts to proximate riparian habitat areas within the project site. In addition, Mitigation Measure BR-5 would require installation of silt fencing between proposed disturbance areas and riparian habitat areas on-site.

The project would be subject to the City's compensatory tree planting policy which requires planting a minimum of one new tree for each tree authorized to be removed when planted on-site or two new trees for each tree authorized to be removed when planted on a different property or within the public right-of-way (off site). The project includes a landscaping planting plan that includes screening trees, parking lot trees, pedestrian plaza trees, shrubs, vines, perennials, and groundcover plantings. In approving the project application for tree removal, the proposed landscaping plan would be evaluated for consistency with the compensatory planting policy and city engineering standards as set forth in the Municipal Code. Mitigation Measure BR-10 has been identified to require in-kind compensatory plantings for each native tree species removed as a result of the project and subsequent monitoring to ensure native tree plantings are established successfully in order to offset the loss of native trees within the project site and reduce long-term impacts to on-site native habitats. Based on review of the deep creek ravine to the south of the project site, and as documented in the Biological Resources Assessment (source reference 57) noted above, the limits of CDFW jurisdiction would extend to the top of the ravine as the extent of riparian habitat, and development within the associated 20-foot creek setback requires consideration of findings pursuant to Zoning Regulations Section 17.70.030 (Creek Setbacks). Structural development associated with the project would be located outside of riparian habitat, and within areas currently disturbed by past grading and development associated with the existing campus. Mitigation Measure BR-5 outlines the creek and riparian habitat protection measures that would be required to be implemented to further avoid and minimize potential impacts to the creek. Mitigation Measures BR-6 through BR-9 have been identified to require preparation of a hazardous materials response plan, monitoring of erosion control measures, setback distances for equipment refueling, and trash collection to further prevent impacts to proximate drainage and sensitive riparian areas within the project site. Upon implementation of

identified mitigation measures, potential impacts to riparian habitat or other sensitive natural communities would be *less than significant with mitigation.*

c) The project site does not support state or federal wetlands. However, there is a creek that traverses the southwest portion of the project site within the existing open space easement and a creek that traverses the northern portion of the property. These two creeks are considered jurisdictional by the State and regulated by CDFW and Regional Water Quality Control Board (RWQCB) from the top of bank or furthest extent of riparian habitat. Further, the creeks are regulated by the City where the top of bank is considered the limit of the creek's hydrology. Mitigation Measure BR-5 outlines the creek and riparian habitat protection measures that would be required to be implemented to further avoid and minimize potential impacts to the creek. Mitigation Measures BR-6 through BR-9 have been identified to require preparation of a hazardous materials response plan, monitoring of erosion control measures, setback distances for equipment refueling, and trash collection to further prevent impacts to proximate drainage and sensitive riparian areas within the project site. Therefore, potential impacts would be *less than significant with mitigation*.

d) The project is not located within an area designated as a wildlife corridor within the COSE. While the project site supports riparian corridors that may support some level of local wildlife movement, the site is generally surrounded by urban development uses, roadways, and a railroad. Therefore, wildlife movement through the riparian habitat areas on-site would be expected to be minimal. The California Essential Habitat Connectivity Project was queried for Essential Habitat Connectivity, which is the best available data describing important areas for maintaining connectivity between large blocks of land for wildlife corridor purposes. These important areas are referred to as Essential Connectivity Areas (ECAs). ECAs are only intended to be a broad-scale representation of areas that provide essential connectivity. The project site is not identified as within an ECA. Therefore, the project would not interfere with the movement of resident or migratory fish or wildlife species or wildlife nursery sites, and impacts would be *less than significant.*

e) Based on the City's Heritage Tree Map, no heritage trees are located within the project site. Proposed tree removal would be conducted in compliance with the City's Tree Ordinance standards for tree removal, subject to review and approval by the City Arborist or other qualified professional during grading and building plan review and inspection.

The City COSE identifies several policies associated with the protection of special status species and preservation of their natural habitats. Mitigation Measures BR-1 and BR-2 have been identified to reduce potential impacts to special-status species and their habitats to less than significant. Therefore, potential impacts associated with conflicts with local policies or ordinances established to protect biological resources would be *less than significant with mitigation.*

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

Mitigation Measures

BR-1 Site preparation, construction, and vegetation removal shall be scheduled to occur outside the nesting bird season (February 15–September 15), if feasible. If proposed site preparation, construction, and/or vegetation removal is scheduled to occur between February 15 and September 15, the project applicant shall retain a qualified biologist to conduct a nesting bird survey no more than 2 weeks prior to disturbance to determine presence/absence of nesting birds within the disturbance area. All findings of the nesting bird survey shall be provided in a monitoring report to the City prior to initiation of project site disturbance activities.

If active nests are observed, vegetation removal shall be avoided within 100 feet of active passerine nests and 300 feet of active raptor nests until young birds have fledged and left the nest. The nests shall be monitored weekly by a biologist with experience with nesting birds. The buffer may be reduced if deemed appropriate by the biologist and approved by City staff. If any federally or state-listed bird species or California fully protected bird species are observed nesting in or near the project site, the biologist and the City shall coordinate with the U.S. Fish and Wildlife Service (USFWS) and/or CDFW before any disturbances occur within 500 feet of the nest.

Readily visible exclusion zones shall be established in areas where nests must be avoided. Bird nests, eggs, or young covered by the MBTA and California Fish and Game Code shall not be moved or disturbed until the end of the nesting season or until young fledge, nor shall adult birds be killed, injured, or harassed at any time. Pursuant to California Fish and Game Code Section 3503.5, nests of raptors (owls, hawks, falcons, eagles) shall not be removed prior to coordination with and approval from the CDFW.

BR-2 If tree removal or site disturbance is necessary during the fall and winter monarch butterfly migration (October 15–February 28), a qualified biologist shall conduct a preconstruction survey for monarch butterflies that could utilize trees on-site for overwintering. If monarch butterflies are detected in the work area or within 300 feet of the work area, tree removal shall be postponed until after the overwintering period or until a qualified biologist determines monarch butterflies are no longer utilizing the trees on or within 300 feet of the site for overwintering.

BR-3 Protective silt fencing shall be installed prior to, and maintained in place until conclusion of, grading and development of the project site to prevent excess soil from sloughing off into sensitive natural habitats and the creek adjacent to proposed disturbance areas. Fencing shall be installed between proposed disturbance areas and natural vegetation located within the existing open space easement.

BR-4 For the life of the project, the project applicant shall retain a qualified biologist to conduct annual biological surveys of the open space easement area to document the condition of the creeks and riparian vegetation on-site, document the condition of existing culverts and other drainage improvements, and identify necessary drainage improvements, vegetation trimming or removal, or other maintenance activities for riparian corridor restoration, erosion control, fire protection, soil stabilization, and/or removal of creek flow obstructions. The annual reports shall be submitted to and reviewed by the City Natural Resources Manager and/or Community Development Department to confirm compliance with the terms and conditions of the open space easement. The project applicant shall coordinate with the City Natural Resources Manager and/or Community Development Department to implement and provide documentation of necessary restoration activities on an as-needed basis.

BR-5 Prior to issuance of grading and construction permits, and any vegetation trimming or removal or other site disturbance activities within the creek corridor areas on-site, the project applicant shall provide the City a copy of a Lake and Streambed Alteration Agreement for the proposed actions, or documentation that an Agreement from the California Department of Fish and Wildlife is not required. In addition, at a minimum, the following avoidance and minimization measures described below shall be implemented within the corridor:

1. Tree and vegetation removal shall be prohibited during rain or within 24 hours following significant rainfall. Significant rainfall is defined as rainfall totaling one-half inch (0.5-inch) of rain in any 24-hour period.
2. All vegetation removal shall be conducted during daylight hours.
3. Prior to vegetation removal, the contractor shall identify the limits of access routes and encroachment to the minimum disturbance required to conduct the vegetation removal. The "work area limits" shall be clearly marked in the field with highly visible flagging or fencing. The flagging or fencing shall be maintained in good repair for the duration of activities. All areas beyond the identified work area limits shall not be disturbed.
4. The aquatic areas within the creeks shall be avoided. Project activities within the aquatic portions of the creeks are prohibited. No work within the channel of the creek shall occur.
5. Prior to construction, a qualified biologist shall conduct training sessions to familiarize all construction personal with the project conditions, limits of disturbance, special-status species with potential to occur in the work areas, general provisions and protections afforded by the state and federal endangered species acts, the Clean Water Act, Porter Cologne Water Quality Act, and California Fish and Game Code.

6. The disturbance or removal of vegetation shall not exceed the minimum necessary to complete the project and shall only occur with the defined work areas. Any disturbed areas shall be restored to as near their original condition as possible.
7. Prior to initiation of project activities, all trees to be cut or removed shall be clearly identified and marked to avoid accidentally removing trees that should be avoided.
8. Staging and storage areas for equipment, materials, fuels, lubricant, and solvents shall be located at least 50 feet from the top-of-bank. All fueling and maintenance of vehicles or other equipment shall be prohibited outside of the designated staging and storage areas.
9. Upon completion of construction, all disturbed soils shall be stabilized using generally-accepted erosion and sediment control practices such as crimped straw and seeds, jute netting, or other appropriate measures. If any mats or netting are used, said mats or netting shall contain only natural fiber materials. Nylon or other synthetic materials shall not be used in mats or netting. All disturbed areas shall be revegetated with riparian or upland vegetation, as appropriate.
10. All project-generated debris, building materials, and rubbish shall be removed from areas where such materials could be washed into the creek corridor.

BR-6 Prior to site preparation and issuance of grading and building permits, the contractor shall prepare a Hazardous Materials Response Plan to allow for a prompt and effective response to any accidental spills and submit the plan to the City Community Development Department for approval. Workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-7 During construction, erosion control measures (e.g., silt fencing, fiber rolls, and barriers) shall remain available on-site and shall be utilized as necessary to prevent erosion and sedimentation in natural habitat areas or drainages. No synthetic plastic mesh products shall be used for erosion control and use of these materials on-site is prohibited. Erosion control measures shall be checked to ensure that they are intact and functioning effectively and maintained on a daily basis throughout the duration of construction.

BR-8 During construction, the cleaning and refueling of equipment and vehicles shall occur only within a designated staging area and at least 100 feet (30 meters) from the top of bank or furthest extent of riparian vegetation of creeks located within the project vicinity. At a minimum, equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

BR-9 During construction, trash shall be contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from the work areas.

BR-10 Prior to issuance of grading and building permits, the project applicant shall submit a final landscape planting plan to the City that shall demonstrate in-kind replacement plantings for every native tree proposed for removal at a 1:1 ratio for on-site plantings and 2:1 ratio for off-site plantings (if proposed). The landscape planting plan shall establish success criteria and include a monitoring and reporting schedule over a 5-year period to ensure the success of native tree plantings. In addition, all replacement plantings located within the open space easement area shall be native species.

Conclusion

The project would have the potential to affect special status wildlife species including overwintering monarch butterflies and nesting birds protected under the MBTA and result in potential indirect impacts to proximate drainage and natural habitat areas. Mitigation Measures BR-1 through BR-10 have been identified to avoid direct impacts to special status wildlife, require in-kind plantings of native trees to be removed, and protect proximate habitat areas during construction activities. Upon implementation of mitigation measures identified above, potential impacts associated with biological resources would be less than significant with mitigation incorporated.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

5. CULTURAL RESOURCES

Would the project:					
a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	1, 2, 14, 17	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	17	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	2, 17	☐	☒	☐	☐

Evaluation

Pre-Historic Setting

Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years. The city of San Luis Obispo is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The Obispeño Chumash occupied much of San Luis Obispo County; the earliest evidence of human occupation in the region comes from archaeological sites along the coast. The project site is not located within a Burial Sensitivity Area as identified in Figure 1 of the COSE.

Historic Setting

In 1946 Navy Medical Corps veteran Dr. Edison French purchased the San Luis Sanitarium on Marsh Street in San Luis Obispo and renamed the facility French Hospital. There he began to practice state-of-the-art medicine and he claimed to be the first surgeon in the county of San Luis Obispo to use intravenous anesthesia, the first to perform a lung resection, and the first to conduct a collapsed lung therapy. He was also the first specialist to actively encourage other specialists to settle in the area. In 1972 Dr. Edison French closed the doors to the French Hospital located on Marsh Street and opened a larger French Hospital located on Johnson Avenue, the current project location. Dr. French passed away in 1976. On June 1, 2004, French Hospital Medical Center was acquired by Dignity Health, one of the nation's largest not-for-profit healthcare systems (source reference 19).

The City COSE establishes various goals and policies to balance cultural and historical resource preservation with other community goals. These policies include, but are not limited to the following:

a. Identification, preservation, and rehabilitation of significant historic and architectural resources;

b. Prevention of demolition of historically or architecturally significant buildings unless doing so is necessary to remove a threat to health and safety;

c. Consistency in the design of new buildings in historical districts to reflect the form, spacing and materials of nearby historic structures; and

d. Identification and protection of neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties.

The project site is located adjacent to the Railroad Historic District (source reference 7). No designated Historic Properties are located within the project site (source reference 20).

The 1993 FHMP MND did not identify any potential impacts associated with archaeological or historical resources.

a) The existing Copeland Health Pavilion would be modified to allow for connecting walking bridges to the proposed patient tower. The project would not result in demolition or removal of any existing structures on-site. The project site is not located within a Historic District or Historic Property designated by the City COSE. The project site does not currently contain any historic resources identified in the National Register of Historic Places (NRHP) or California Register of

Historical Resources (CRHR). The project site is not identified on the City's Historical Properties map; therefore, the project would not result in a substantial adverse change in the significance of, or any other adverse impact to, a historical resource and potential impacts would be *less than significant.*

b) The project would include excavation and grading to allow for the construction of building foundations. The project development site is almost entirely paved, with the exception of the 0.11-acre are proposed to be removed from the existing open space and drainage easement. A records search was requested from the Central Coast Information Center (CCIC) of the California Historical Resources Information System (CHRIS), located at the Santa Barbara Museum of Natural History. Staff at the CCIC completed the CHRIS records searches of the project site and all areas within a 1/8-mile radius on September 8, 2021. The CCIC records search results revealed that five reports have been prepared that overlap with all or a portion of the project site and no resources have been identified within the project area. Within a 1/8-mile radius of the project area, 10 reports have been completed and one resource has been identified. Therefore, the project would not result in the disturbance of any known archaeological resources.

Based on the developed nature of the project site and negative results of the records search, the project site has low potential for containing archaeological or cultural resources. However, based on the rich cultural history of the city there is potential for project excavation and grading activities to uncover and/or disturb previously unknown archaeological resources. Mitigation Measure CR-1 has been identified to require cultural resource awareness training of all construction personnel. If previously unidentified cultural materials are unearthed during proposed ground-disturbing activities, Mitigation Measure CR-2 has been identified to require work be halted in the area until a City-qualified archaeologist can assess the significance of the find. With implementation of identified measures, impacts related to a substantial adverse change in the significance of archaeological resources would be *less than significant with mitigation*.

c) The project site is not located within a Burial Sensitivity Area identified in "Figure 1: Cultural Resources" of the City COSE. No human remains are known to exist within the project site; however, the discovery of unknown human remains is possible during ground disturbing activities. Protocol for properly responding to the inadvertent discovery of human remains is identified in the State of California Health and Safety Code Section 7050.5 and would be required to be printed on all building and grading plans per Mitigation Measure CR-3. Potential impacts related to disturbance of human remains would be less than significant with incorporation of Mitigation Measure CR-3. Therefore, impacts related to disturbance of human remains would be *less than significant with mitigation.*

Mitigation Measures

CR-1 Prior to construction activities, a City-qualified archaeologist shall conduct cultural resource awareness training for all construction personnel including the following:

1. Review the types of archaeological artifacts that may be uncovered;
2. Provide examples of common archaeological artifacts to examine;
3. Review what makes an archaeological resource significant to archaeologists and local native Americans;
4. Describe procedures for notifying involved or interested parties in case of a new discovery;
5. Describe reporting requirements and responsibilities of construction personnel;
6. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.

CR-2 If cultural resources are encountered during subsurface earthwork activities, all ground-disturbing activities within a 50-foot radius of the find shall cease and the City shall be notified immediately. Work shall not continue until a City-qualified archaeologist assesses the find and determines the need for further study. If the find includes Native American affiliated materials, a local Native American tribal representative shall be contacted to work in conjunction with the City-approved archaeologist to determine the need for further study. A standard inadvertent discovery clause shall be included in every grading and construction contract to inform contractors of this

requirement. Any previously unidentified resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist.

If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan, in conjunction with locally affiliated Native American representative(s) as necessary, that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analysis, prepare a comprehensive report, and file it with the CCIC, located at the Santa Barbara Museum of Natural History, and provide for the permanent curation of the recovered materials.

CR-3 In the event that human remains are exposed during earth disturbing activities associated with the project, an immediate halt work order shall be issued, and the Community Development Director and locally affiliated Native American representative(s) (as necessary) shall be notified. State Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. These requirements shall be printed on all building and grading plans.

Conclusion

With implementation of the recommended Mitigation Measures CR-1 through CR-3, the project would have a less-than-significant impact on cultural resources.

6. ENERGY

Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	1, 22	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	1, 22	☐	☒	☐	☐

Evaluation

Energy sources for the city of San Luis Obispo are served primarily by Pacific Gas & Electric (PG&E) and 3CE. PG&E energy generation was supplied from approximately 29% of renewable energy sources (i.e., biomass and waste, geothermal, small hydroelectric, solar, and wind), 27% of large hydroelectric sources, and 44% of nuclear sources. Participation in PG&E as an electricity provider is mandatory. 3CE is a locally controlled public agency supplying clean and renewable electricity for residents and businesses in Monterey, San Benito, parts of San Luis Obispo, Santa Barbara, and Santa Cruz Counties. 3CE is based on a local energy model called Community Choice Energy that partners with the local utility (i.e., PG&E) which continues to provide consolidated billing, electricity transmission and distribution, customer service and grid maintenance services. 3CE provides customers with a choice for clean and renewable energy, and community reinvestment through rate benefits and local greenhouse gas (GHG)-reducing energy programs for residential, commercial, and agricultural customers. Participation in 3CE as an electricity provider is voluntary. Natural gas services in the city of San Luis Obispo are provided by PG&E and Southern California Gas Company (SoCalGas).

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent

version of which are referred to as the 2019 Building Energy Efficiency Standards. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements.

The City's Clean Energy Choice Program for New Buildings encourages clean, efficient, and cost effective all-electric new buildings through incentives and local amendments to the California Energy Code. When paired with cost comparable modern electric appliances and carbon-free electricity from 3CE, all-electric new buildings are operationally GHG emissions-free and cost effective. There are several exemptions to the Clean Energy Choice Program for New Buildings, including natural gas plumbing and appliances in commercial kitchens, and emergency generators, and other uses of natural gas required for public health and safety.

The City of San Luis Obispo Climate Action Plan for Community Recovery is a long-range plan to reduce GHG emissions from City government operations and community activities. The Climate Action Plan will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, and supporting local economic development. The Climate Action Plan was prepared with the goal of achieving carbon neutrality by 2035. The Climate Action Plan includes measures to reduce community wide GHG emissions by 45% below 1990 levels by 2030 and 66% below 1990 levels by 2035, which is consistent with California's goal of reducing GHG emissions to 40% below 1990 levels by 2030.

The Energy section of the City COSE includes various goals and policies pertaining to energy use. Applicable General Plan goals include the following:

- Goal 4.2. Sustainable Energy Use. Increase use of sustainable energy sources such as solar, wind and thermal energy, and reduce reliance on non-sustainable energy sources to the extent possible with available technology and resources.
- Goal 4.4.4. Solar Access. Encourage the provision for and protection of solar access.

a) Implementation of the proposed project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail below.

Construction-Related Energy Consumption

Energy consumption would occur during construction, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Fuel use would be predominantly associated with the use of off-road equipment, worker commute trips to and from the site, and haul truck trips. Table 6 below summarizes the levels of energy consumption associated with project construction. In total construction activities would consume approximately 64,458 gallons of diesel fuel and approximately 11,886 gallons of gasoline, which would equate to a total consumption of approximately 10,285 million British thermal units (MMBTU).

Table 6. Construction Energy Consumption

Source	Total Fuel Use (gallons)[1]		Total MMBTU
	Diesel	Gasoline	
Parking Deck (Years 2022–2023)			
Off-Road Equipment Use (Diesel)	28,989	-	3,983
On-Road Vehicles (Diesel)	1,407	-	193
On-Road Vehicles (Gasoline)	-	5,623	677
Subtotal	*30,396*	*5,623*	*4,852*
Patient Tower (Years 2023–2024)			
Off-Road Equipment Use (Diesel)	29,821	-	4,097

On-Road Vehicles (Diesel)	4,241	-	583
On-Road Vehicles (Gasoline)	-	6,263	754
Subtotal	*34,062*	*6,263*	*5,433*
Total All Construction Activities	**64,458**	**11,886**	**10,285**

[1] Fuel use was calculated based, in part, on default construction schedules, equipment uses, and vehicle trips identified for the construction of similar land uses contained in the CalEEMod output files prepared for the air quality analysis conducted for this project. Refer to Appendix A of Attachment 3 for modeling assumptions and results.

Idling of heavy-duty diesel construction equipment and trucks during loading and unloading would be limited to five minutes in accordance with current regulatory requirements. Based on the scope of proposed construction activities, the project would not require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. Energy use associated with construction of the proposed project would be temporary and would not be anticipated to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. To ensure maximum energy efficiency over the course of the 36-month construction period, Mitigation Measure AQ-1 would require use of equipment that meets CARB's Tier 3 and Tier 4 emissions standards to the extent locally available, electrification of equipment when feasible, and use of gasoline-powered equipment in place of diesel-fueled equipment where feasible (see Section 3, Air Quality). With implementation of Mitigation Measure AQ-1, potential impacts associated with wasteful, inefficient, or unnecessary energy use during construction would be *less than significant with mitigation.*

Operational Mobile-Source Energy Consumption

Transportation fuel-use estimates were calculated by applying average fuel usage rates per vehicle mile to VMT associated with the proposed project, derived from CalEEMod. Under opening year conditions (2025), with the inclusion of currently implemented Transportation Demand Management (TDM) strategies, the vehicle trips associated with the proposed land uses would consume an annual estimated 19,476 gallons of diesel and 99,151 gallons of gasoline. Estimated total fuel usage would equate to the consumption of an estimated 14,607 MMBTU. The inclusion of recommended TDM strategies identified in Mitigation Measure ENG-1 would result in additional reductions in commute-related VMT of approximately 5–10% (see Section 8, Greenhouse Gas Emissions). With the inclusion of the proposed TDM strategies, overall energy consumption associated with fuel usage would range from approximately 14,542 to 14,882 MMBTU, depending on the effectiveness of the TDM strategies implemented.

Under future year conditions (2030), with the inclusion of currently implemented TDM strategies, the vehicle trips associated with the proposed land uses would consume an annual estimated 17,408 gallons of diesel and 91,564 gallons of gasoline. Estimated total fuel usage would equate to the consumption of an estimated 13,410 MMBTU. The inclusion of recommended TDM strategies would result in additional reductions in commute-related VMT of approximately 5–10%. With the inclusion of the proposed TDM strategies, overall energy consumption associated with fuel usage would range from approximately 13,295 to 13,350 MMBTU, depending on the effectiveness of the TDM strategies implemented.

The development of increasingly efficient automobile engines would result in increased energy efficiency and energy conservation over time. Implementation of Mitigation Measures ENG-1 and ENG-2 would require implementation of additional trip-reduction measures and TDM strategies that would further reduce project-related VMT and associated energy use. Therefore, with implementation of Mitigation Measures ENG-1 and ENG-2, potential impacts with wasteful, inefficient, or unnecessary energy use associated with operational mobile-source energy consumption would be *less than significant with mitigation.*

Operational On-site Energy Consumption

The proposed project would result in increased electricity and natural gas consumption associated with the long-term on-site operations. Estimated electricity, water, and natural gas consumption associated with the proposed project are summarized in Table 7. In total, the proposed project would consume approximately 19,130 MMBTU per year.

Table 7. Operational Electricity, Water, and Natural Gas Consumption

Source	Annual Energy Use	Annual MMBTU
Electricity (kWh)	1,738,940	5,933
Water (kWh)	36,216	3,412
Natural Gas Use (kBTU)	9,784,580	9,785
	Total	**19,130**

Notes: kWh = Kilowatt hour; kBTU = Kilo British thermal unit

Represents energy consumption anticipated to occur for opening year 2025 and future year 2030 conditions and includes compliance with exiting building code requirements and implementation of energy-reducing mitigation measures.

The project would be served by 3CE for electricity provider services and would be subject to energy conservation requirements in the CEC (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (24 CCR Part 11). Proposed mitigation measures related to energy conservation, including those identified in Mitigation Measure ENG-2, would result in reductions in energy use beyond current building code requirements. With adherence to building code requirements and implementation of recommended mitigation measures, the project would not result in wasteful, inefficient, or unnecessary use of energy resources due to building operation and potential impacts would be *less than significant with mitigation.*

b) The project would be required to be in full compliance with California building code requirements, including applicable green building standards and building energy efficiency standards. Furthermore, implementation of recommended mitigation measures and compliance with the City's Clean Energy Choice Program for New Buildings would further reduce energy usage. Mitigation measures have also been identified to reduce water and natural gas use. Compliance with these mitigation measures would ensure the conservation and preservation of energy resources by increasing energy efficiency of buildings, appliances, and buildings to the use of alternative forms of energy. Therefore, potential impacts associated with conflict with a state or local plan for renewable energy or energy efficiency would be *less than significant with mitigation.*

Mitigation Measures

Implement Mitigation Measure AQ-1.

ENG-1 The project applicant shall submit a TDM Plan for review and approval by the City Public Works Department prior to issuance of building permits. The plan shall identify the TDM strategies to be implemented and methods for monitoring the effectiveness of the TDM strategies. The TDM program shall be reviewed and approved by City's Transportation Division prior to implementation. The TDM plan shall include strategies and/or payment of traffic mitigation fees sufficient to achieve the City's significance threshold of 15% below the existing County average vehicle miles traveled per service population (VMT/SP) of 17.43 VMT/SP. At a minimum, based on the VMT analysis prepared for this project and in addition to the measures currently implemented, the following strategies, or equivalent measures that achieve 17.43 VMT or less as approved by the City Public Works Transportation Division, shall be implemented (Michael Baker International [MBI] 2021):

1. Provide parking cash-out programs for employees;
2. Provide employer-implemented ride-sharing program for employees; and,
3. Implement commute trip-reduction marketing strategies for employees.

ENG-2 Prior to issuance of construction permits, the following additional mitigation measures shall be shown on project plans and implemented to further reduce operational consumption of energy resources:

1. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.
2. Exceed Cal Green standards by 25% for providing on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only.
3. Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed Cal Green Tier 2.
4. Meet or exceed Cal Green Tier 2 standards for providing EV charging infrastructure.
5. Meet or exceed Cal Green Tier 1 standards for building energy efficiency.
6. Meet or exceed Cal Green Tier 2 standards for utilizing recycled content materials.
7. All built-in appliances shall be Energy Star certified or equivalent.
8. Meet or exceed City Water Efficient Landscape standards by 15%.
9. Low-flow water fixtures shall be installed.
10. Proposed landscaping shall include water-efficient landscapes and irrigation systems.

Conclusion

The project would result in potentially significant impacts associated with construction and operational energy use and may conflict with applicable energy efficiency and renewable energy plans and policies. With implementation of mitigation measures identified above, potential impacts associated with energy would be less than significant with mitigation incorporated.

7. GEOLOGY AND SOILS

Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	23, 24	☐	☐	☐	☒
ii. Strong seismic ground shaking?	23, 24	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	23	☐	☐	☒	☐
iv. Landslides?	1, 23	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	1, 23	☐	☐	☒	☐
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?	23, 25, 26, 27	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial direct or indirect risks to life or property?	26, 27	☐	☐	☒	☐

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	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 waste water disposal systems where sewers are not available for the disposal of waste water?	1	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	27, 28, 29	☐	☐	☒	☐

Evaluation

The City Safety Element identifies active, potentially active, and inactive mapped and inferred faults with the potential to affect the city in the event of rupture. The Los Osos Fault, adjacent to the city of San Luis Obispo, is identified under the State of California Alquist-Priolo Fault Hazards Act and is classified as active. The West Huasna, Oceanic, and Edna faults are considered potentially active and present a moderate fault rupture hazard to developments near them. The San Andreas Fault and the offshore Hosgri Fault, which present the most likely source of ground shaking for San Luis Obispo, have a high probability of producing a major earthquake within an average project lifespan. The highest risk from ground shaking is found on deep soils that were deposited by water, are geologically recent, and have many pore spaces among the soil grains. These are typically in valleys (source reference 23).

Faults capable of producing strong ground shaking motion in San Luis Obispo include the Los Osos, Point San Luis, Black Mountain, Rinconada, Wilmar, Pecho, Hosgri, La Panza, and San Andreas faults. Engineering standards and building codes set minimum design and construction methods for structures to resist seismic shaking. Based on the Department of Conservation Fault Activity Map and the City Safety Element Earthquake Faults – Local Area map, the project site is not located within or within the immediate vicinity of an active fault zone (source references 23, 24).

Seismic-Related Ground Failure

Settlement is defined as the condition in which a portion of the ground supporting part of a structure or facility settles (lowers) more than the rest or becomes softer, usually because ground shaking reduces the voids between soil particles, often with groundwater rising in the process. Liquefaction is the sudden loss of the soil's supporting strength due to groundwater filling and lubricating the spaces between soil particles as a result of ground shaking. Soils with high risk for liquefaction are typically sandy and in creek floodplains or close to lakes. In extreme cases of liquefaction, structures can tilt, break apart, or sink into the ground. The likelihood of liquefaction increases with the strength and duration of an earthquake. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is not located within an area with high liquefaction potential.

Slope Instability and Landsides

Slope instability can occur as a gradual spreading of soil, a relatively sudden slippage, a rockfall, or in other forms. Causes include steep slopes, inherently weak soils, saturated soils, and earthquakes. Improper grading and manmade drainage can be contributing factors. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with moderate landslide potential.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth's surface due to subsurface movement of earth materials. Primary causes are ground-water withdrawal, in which water is removed from pore space as the water table drops, causing the ground surface to settle; tectonic subsidence, where the ground surface is warped or dropped lower due to geologic factors such as faulting or folding; and earthquake-induced shaking that causes sediment liquefaction, which in turn can lead to ground-surface subsidence. Based on the U.S. Geological Survey (USGS) Areas of Land Subsidence in California Map, the project site is not located in an area of known subsidence (source reference 25).

Soil Limiting Factors

The project site is underlain by two soil units, as described below based on the San Luis Obispo County Soil Survey (source reference 27):

- 130. Diablo and Cibo clays, 9 to 15 percent slopes. These strongly sloping soils occur on low lying foothills. The Diablo soil is deep and well drained, with slow permeability and moderate water erosion hazard. The Cibo soil is moderately deep and well drained, with slow permeability and moderate water erosion hazard. Both soils have high shrink swell potential. Limitations for urban development on this soil complex are the high shrink swell potential, low strength, and slow permeability. The soil is also hard to pack due to high clay content. Foundation and footing design should consider these limitations.
- 164. Los Osos-Diablo complex, 15 to 30 percent slopes. These moderately steep soils are moderately deep to deep and well drained. Permeability is slow and surface runoff is rapid. The hazard of water erosion is moderate or high. The soil has high shrink swell potential in the subsoil and is subject to slippage when wet. Limitations to urban development include the steep slopes, high shrink-swell potential, and low strength. Because of these limitations, the subgrade often needs to be removed and replaced with a more suitable material, or a high degree of compaction and moisture control needs to be maintained during construction. Septic tank absorption fields do not function properly because of the slope, slow permeability, and depth to rock.

The 1993 FHMP MND evaluated geologic and seismic hazards and topographic modifications and concluded that the buildout of hospital facilities proposed at the time would not result in any potentially significant impacts and no mitigation measures were necessary.

a.i) Based on Figure 3 (Earthquake Faults – Local Area) of the Safety Element of the City's General Plan and the Department of Conservation Fault Activity Map of California, the project site is not located within a mapped Alquist-Priolo earthquake hazard zone or other mapped earthquake fault zone. The nearest mapped fault zone to the project site is a fault line associated with the Oceanic fault zone, approximately 1.5 miles northwest of the project parcel. Therefore, the project would not have the potential to result in substantial adverse effects involving rupture of a known earthquake fault and *no impacts* would occur.

a.ii) Based on Figure 3 (Earthquake Faults – Local Area) of the Safety Element of the City's General Plan and the Department of Conservation Fault Activity Map of California, the project site is not located within 1 mile of a known active or potentially active fault. However, San Luis Obispo is located in a seismically active region and there is always a potential for seismic ground shaking. The project would be required to comply with the CBC and other applicable standards to ensure the effects of a potential seismic event would be minimized through compliance with current engineering practices and techniques. The project does not include unique components that would be particularly sensitive to seismic ground shaking or result in an increased risk of injury or damage as a result of ground shaking. Implementation of the project would not expose people or structures to significant increased risks associated with seismic ground shaking; therefore, impacts would be *less than significant.*

a.iii) Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is not located in an area with high potential for liquefaction. In addition, development would be required to be designed in compliance with CBC seismic requirements to address the site's potential for seismic-related ground failure; therefore, the potential impacts would be *less than significant.*

a.iv) Landslides typically occur in areas with steep slopes or in areas containing escarpments. Based on the County Safety Element Ground Shaking and Landslide Hazards Map is located in an area with moderate potential for landslide risk. The project development site is located within existing parking areas with nearly level topography and the project would not require substantial grading that would alter the topography of the site. There are no steep slopes within or immediately adjacent to the project site. Therefore, the project would not result in significant adverse effects associated with landslides and impacts would be *less than significant.*

b) The project would require approximately 3,260 cubic yards of materials to be exported from the site, including the removal of 105 trees, existing pavement within the project building footprints, and soil to be removed to allow for the construction of building foundations. Site disturbance would occur over a total area of 3.33 acres. Projects that disturb 1 acre of soil or more are required to obtain National Pollutant Discharge Elimination System (NPDES) coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit), Order No. 2009-0009-DWQ. The General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes Best Management Practices (BMPs) to stormwater runoff, including measures to prevent soil erosion. Because more than 1 acre of land would be disturbed during the construction phase, the applicant would be required to prepare a SWPPP and obtain a storm water permit from the RWQCB. Compliance with permit conditions would require implementation of erosion control BMPs. Therefore, based on compliance with existing regulations, impacts related to soil erosion and loss of topsoil would be *less than significant.*

c) Landslides typically occur in areas with steep slopes or in areas containing escarpments. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is not located within an area with high landslide potential and the project development site is located in an area with nearly level topography. Based on the County Safety Element and USGS data, the project is not located in an area of historical or current land subsidence. The project site is not located within an area with high liquefaction potential. The project would also be required to comply with CBC seismic requirements to address potential seismic-related ground failure including lateral spread and liquefaction. Therefore, based on compliance with existing regulations, potential impacts related to location on a geologic unit or soil unit that is unstable would be *less than significant.*

d) Based on the Soil Survey of San Luis Obispo County and Web Soil Survey, the project site is located in an area underlain by soils with high shrink well potential. The volume changes that soils undergo in this cyclical pattern can stress and damage slabs and foundations. A soils report prepared by a qualified engineer is required upon review of the building permit to evaluate the proposed development activities and provide specific recommendations to adequately protect future proposed development against soil stability hazards, including expansive soils. Typical precautionary measures would likely include premoistening of the underlying soil in conjunction with placement of non-expansive material beneath slabs, and a deepened and more heavily reinforced foundation. Therefore, based on compliance with existing regulations, potential impacts associated with expansive soils would be *less than significant.*

e) The project would include a new connection to the city sewer system. No septic tanks or alternative wastewater treatment systems are proposed onsite. Therefore, *no impacts* would occur.

f) The project site is developed with existing hospital and office uses, paved and landscaped parking areas, and an open space and drainage easement with a bike path. The project site does not support any unique geologic features. The project site is underlain by a Jurassic/Cretaceous period-aged mélange of claystone, graywacke, and blocks of other Franciscan rocks (fm). Geologic units within the Franciscan Complex, such as fm, are considered to have low potential for producing significant fossils (source reference 29). Therefore, potential impacts to paleontological resources would be *less than significant.*

Mitigation Measures

None necessary.

Conclusion

Based on the location of the project site and underlying geologic and soil properties, and compliance with existing regulations, potential impacts associated with geology and soils would be less than significant, and no mitigation measures are required.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

8. GREENHOUSE GAS EMISSIONS

Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	1, 11, 58, 59, 60	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	1, 11, 30, 58, 59, 60	☐	☒	☐	☐

Evaluation

GHGs are any gases that absorb infrared radiation in the atmosphere, and are different from the criteria pollutants discussed in Section III, Air Quality, above. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The City has completed a community-wide inventory of GHG emissions for years 2005 and 2016, which are summarized in Table 8. As shown, a majority of the City's emissions are associated with mobile sources. Remaining GHG emissions are predominantly associated with energy use and solid waste generation. In comparison to year 2005 community-wide emissions, year 2016 emissions decreased by a total of approximately 12%.

Table 8. City of San Luis Obispo GHG Emissions Inventories

Sector	Year 2005	Year 2016	Percent Change from 2005–2016
Transportation	225,390	212,980	-6%
Non-residential Energy	58,050	44,270	-24%
Residential Energy	55,450	39,410	-29%
Solid Waste	47,740	42,630	-11%
Total	386,630	339,290	-12%

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 CARB to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050. 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 CBC contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The California Building Code is adopted every three years by the Building Standards Commission (BSC). In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

The 2019 Regional Transportation Plan (RTP) was adopted by the San Luis Obispo Council of Governments (SLOCOG) Board in June 2019. The RTP includes the region's Sustainable Communities' Strategy (SCS), which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management & system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by CARB. The 2019 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region's jurisdictions.

The City of San Luis Obispo Climate Action Plan for Community Recovery (Climate Action Plan) is a long-range plan to reduce GHG emissions from City government operations and community activities. The Climate Action Plan will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, supporting local economic development. The Climate Action Plan was prepared with the goal of achieving carbon neutrality by 2035. The Climate Action Plan includes measures to reduce community wide GHG emissions by 45% below 1990 levels by 2030 and 66% below 1990 levels by 2035, which is consistent with California's goal of reducing GHG emissions to 40% below 1990 levels by 2030.

a) Projects that are consistent with the demographic forecasts and land use assumptions used in the City Climate Action Plan can utilize the City's CEQA GHG Emissions Analysis Compliance Checklist to demonstrate consistency with the Climate Action Plan's GHG emissions reduction strategy. If deemed consistent, the project would be considered to have a less-than-significant impact associated with greenhouse gas emissions. The following provides a discussion of the proposed project's consistency determination with the City's Climate Action Plan:

Step 1: Consistency with the Demographic Forecasts and Land Use Assumptions

The demographic forecasts and land use assumptions of the Climate Action Plan are based on the Land Use and Circulation Elements of the City's 2014 General Plan. If a plan or project is consistent with the existing 2014 General Plan land use and zoning designations of the project site, then the project would be considered consistent with the demographic forecasts and the land uses assumptions of the Climate Action Plan.

The proposed project would not include a land use element and/or zoning designation amendment and would not result in an increased population. The project would be considered consistent with the demographic forecasts and the land uses assumptions of the Climate Action Plan.

Step 2: Consistency with the CEQA GHG Emissions Analysis Compliance Checklist

The City has prepared a CEQA GHG Emissions Analysis Compliance Checklist for plans and projects to ensure that they are consistent with the measures of the Climate Action Plan. Projects deemed consistent with the measures identified in the checklist would be considered to have a less-than-significant impact. The project's consistency with the City's Climate Action Plan is summarized in Table 9 below.

Table 9. Project Consistency with the City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Clean Energy Systems	
Does the Project include an operational commitment to participate in Central Coast Community Energy (formerly Monterey Community Power)?	**Consistent**. The project site currently uses 3CE as their electricity provider. The proposed project would continue to use 3CE as their electricity provider.
Green Buildings	
Does the Project exclusively include "All-electric buildings"? Specific exemptions to the requirements for all-electric buildings include: • Commercial kitchens • The extension of natural gas infrastructure into an industrial building for the purpose of supporting manufacturing processes (i.e., not including space conditioning, etc.). • Accessory Dwelling Units that are attached to an existing single-family home.	Consistent. Hospitals and medical facilities are exempt from requirements for "all electric buildings." However, the project includes various measures to reduce GHG emissions associated with building energy use. Specifically, based on information provided by the project applicant, the project has been designed to achieve a 19% total energy savings over the 2019 CALGreen baseline (see Attachment 11). In addition, a solar photovoltaic (PV) system is proposed to be installed over grade-level on-site parking. The PV system would provide an estimated 560 kilowatt-hours (kWh) of electricity annually (source reference 57).

• Essential service buildings, including, but not limited to, public facilities, hospitals, medical centers, and emergency operations centers. • Temporary buildings. • Gas line connections used exclusively for emergency generators. • Any buildings or building components exempt from the California Energy Code. • Residential subdivisions in process of permitting or constructing initial public improvements for any phase of a final map recorded prior to January 1, 2020, unless compliance is required by an existing Development Agreement. If the proposed project falls into an above exemption category, what measures are applicants taking to reduce on-site fossil fuel consumption to the maximum extent feasible? If not applicable (N/A), explain why action is not relevant.	
If the Project/Plan includes a new mixed-fuel building or buildings (plumbed for the use of natural gas as fuel for space heating, water heating, cooking or clothes drying appliances) does that building/those buildings meet or exceed the City's Energy Reach code?	**Consistent.** The proposed patient tower building would be a mixed-fuel building and future development plans include the installation of a 360-kilowatt direct current (kW DC) solar PV system on-site. The project applicant team has provided an analysis of the proposed patient tower's anticipated energy efficiency prepared by a qualified energy analyst (see Attachment 11). Based on the analysis provided, the patient tower would comply with the performance standards set forth in the City Energy Reach Code. The project would be conditioned to demonstrate full compliance with the standards set forth by the City's Energy Reach Code prior to Building Permit issuance.
Connected Community	
Does the Project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?	**Consistent**. The project has been designed to comply with LEED building standards for on-site bicycle parking facilities and the City's municipal code requirements.
Is the estimated Project-generated Vehicle Miles Traveled (VMT) within the City's adopted thresholds, as confirmed by the City's Transportation Division?	**Consistent**. As discussed in Section 17, *Transportation*, the project, as proposed, would exceed the City's adopted VMT thresholds. The project applicant has coordinated with the City Transportation Division to develop VMT mitigation measures to reduce project VMT below City thresholds (see Mitigation Measures ENG-1 and ENG-2, and TR-1). The project's proposed TDM plan would be subject to the review and approval of the City Transportation Division prior to issuance of building permits.
If "No", does the Project/Plan include VMT mitigation strategies and/or a Transportation Demand Management (TDM) Plan approved by the City's Transportation Division?	
Does the Project demonstrate consistency with the City's Bicycle Transportation Plan (superseded by the adopted Active Transportation Plan)?	**Consistent**. The existing bike path located on the project site would be retained and portions of the existing path would be realigned to ensure on-site/off-site connectivity. In addition, the project has also been designed to comply with LEED building standards for on-site bicycle parking facilities.
Circular Economy	
Will the Project subscribe all units and/or buildings to organic waste pick up and provide the appropriate on-site enclosures consistent with the provisions of the City of San Luis Obispo	**Consistent**. The existing hospital facilities currently utilize San Luis Garbage company for waste collection services and would continue to do so with project implementation. The project has

Development Standards for Solid Waste Services? Please provide a letter from San Luis Garbage company verifying that the project complies with their standards and requirements for organic waste pick up.	been designed to include solid waste receptacles and enclosures throughout the site and a compactor located parallel to the loading dock. Based on a letter from the operations manager, San Luis Garbage Company has reviewed the preliminary site plan for compatibility with their vehicles and has approved the plan. Compliance with all waste and organic waste removal standards would be verified prior to building permit issuance.
Natural Solutions	
Does the Project comply with Municipal Code requirements for trees?	**Consistent**. The project would be subject to the City's compensatory tree planting policy which requires planting a minimum of one tree for each tree authorized to be removed when planted on-site or two new trees for each tree authorized to be removed when planted on a different property or within the public right-of-way (off-site). The project includes a landscaping planting plan that includes screening trees, parking lot trees, pedestrian plaza trees, shrubs, vines, perennials, and groundcover plantings. At the time tree removal permits are applied for, the proposed landscaping plan would be evaluated for consistency with the compensatory planting policy and City engineering standards as set forth in the Municipal Code. Compliance with all tree removal and replacement planting standards would be verified prior to building permit issuance.

As shown in Table 9 above, the project would be in compliance with the requirements set forth in the Checklist. Therefore, potential impacts would be *less than significant*.

Applicable GHG-reduction plans related to reducing operational GHG emissions is the City of San Luis Obispo Climate Action Plan for Community Recovery and the County of San Luis Obispo's Regional Transportation Plan/Sustainable Communities Strategy. The project's consistency with these plans is discussed in greater detail below.

City of San Luis Obispo Climate Action Plan for Community Recovery

As discussed under Threshold 8.a above, the project would be consistent with the City's Climate Action Plan and potential impacts would be *less than significant*.

County of San Luis Obispo 2019 Regional Transportation Plan/Sustainable Communities Strategy

The 2019 Regional Transportation Plan (RTP) was adopted by the SLOCOG Board in June 2019. The RTP includes the region's Sustainable Communities' Strategy (SCS), which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management & system management tools and techniques to maximize the efficiency of the transportation network.

The proposed project would result in increased employment and would not result in an increase in housing. As a result, the proposed project could exacerbate the jobs-housing imbalance. In addition, the proposed project would result in increased VMT. A VMT analysis was prepared for this project by Michael Baker International, which included an analysis of project-generated VMT and potential impacts to regional VMT reduction efforts. As discussed in Section 17, Transportation, the project would result in generation of VMT in excess of City thresholds and would increase regional VMT. As a result, the proposed project would not be consistent with VMT projections upon which the RTP/SCS is based.

Implementation of Mitigation Measure ENG-1 would require the preparation of a TDM plan, which would include measures sufficient to reduce the project's overall VMT to below the City's threshold of significance. In addition, Mitigation Measure ENG-2 includes additional measures that would reduce project-generated VMT through provision of bicycle parking on-site in exceedance of CALGreen standards, provision of dedicated parking for carpools, and other measures. With mitigation, the project would be considered consistent with the SCS and regional GHG-reduction planning

efforts, which have been deemed consistent with State-wide GHG-reduction planning efforts; therefore, impacts would *be less than significant with mitigation.*

Mitigation Measures

Implement Mitigation Measures ENG-1 and ENG-2.

Conclusion

The project would not result in potentially significant impacts associated with greenhouse gas emissions. The project may result in a conflict with applicable greenhouse gas emissions reduction plans and policies. Mitigation Measures ENG-1 and ENG-2 would reduce potential impacts associated with conflicts with GHG reduction plans and policies to less than significant. Therefore, potential impacts associated with greenhouse gas emissions would be less than significant with mitigation.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1	☐	☐	☒	☐
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?	1, 10, 31, 32, 33	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1, 7	☐	☒	☐	☐
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?	31, 32, 33	☐	☐	☒	☐
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?	34	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	1, 35	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	1	☐	☐	☒	☐

Evaluation

The Hazardous Waste and Substances Site (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA (CalEPA) to develop at least annually an updated Cortese List. Various state and local government agencies are required to track and document hazardous material release

information for the Cortese List. The California Department of Toxic Substance Control (DTSC) EnviroStor database tracks DTSC cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination, such as federal superfund sites, state response sites, voluntary cleanup sites, school cleanup sites, school investigation sites, and military evaluation sites. The State Water Resources Control Board (SWRCB) GeoTracker database contains records for sites that impact, or have the potential to impact, water in California, such as Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program Sites. The remaining data regarding facilities or sites identified as meeting the "Cortese List" requirements can be located on the CalEPA website: https://calepa.ca.gov/sitecleanup/corteselist/.

Based on a review of the SWRCB's GeoTracker database and the DTSC's EnviroStor database, the project site is not located within an active hazardous waste cleanup site. The closest active investigation site is a Cleanup Program Site located approximately 850 feet to the north of the project parcel on San Luis Drive. Cleanup Program Sites includes all non-federally owned sites that are regulated under the SWRCB's Site Cleanup Program and/or similar programs conducted by each of the nine RWQCBs. According to current SWRCB records, the Cleanup Program Site on San Luis Drive has undergone assessment and interim remedial action as of 2019 and semi-annual groundwater monitoring continues. No historic oil or gas wells are recorded within the project site or immediate vicinity (source reference 33).

The project site is located approximately 2.3 miles north of the San Luis Obispo County Regional Airport and is not located within the associated Airport Influence Area (source reference 34).

a) The project does not propose the routine transport, use or disposal of hazardous substances. Any commonly used hazardous substances within the project site (e.g., cleaners, solvents, oils, paints, fuel, etc.) would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials. Therefore, project impacts associated with the routine transport, use, or disposal of hazardous substances would be *less than significant.*

b) Construction activities associated with the project are anticipated to require use of limited quantities of hazardous substances, including gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc. Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling of hazardous materials, including the Federal Occupational Safety and Health Administration (OSHA) Process Safety Management Standard (CCR 29.1910.119), which includes requirements for preventing and minimizing the consequences of accidental release of hazardous materials. Based on the location of proposed excavation, grading, and construction to adjacent drainage and riparian habitats, any accidental spills of fuels or other hazardous substances may cause a significant hazard to the environment. Mitigation Measure BR-6 has been identified to require preparation and approval of a Hazardous Materials Response Plan and Mitigation Measure BR-8 would require location of equipment cleaning and refueling to be located a minimum of 100 feet from on-site natural habitat areas. With implementation of these measures, potential impacts associated with accidental spills would be less than significant.

   The project site would not require disturbance within close proximity of US 101 or other highly travelled roadways that would have the potential to contain soils that may have unsafe concentrations of aerially deposited lead. As described in Section 3, Air Quality, the project site is located in an area with potential for naturally occurring asbestos and existing pavement to be demolished may contain asbestos containing materials and/or lead based paint. Disturbance of soil with NOA or building materials with ACM or lead may have the potential to result in health hazards to proximate on-site occupants and off-site receptors. Mitigation Measure AQ-4 has been identified to require a geologic analysis of soils to be disturbed and compliance with applicable state and local protocol for testing, removing, and disposing of NOA, ACM, and lead.

   Any commonly used hazardous substances during operation of the project (e.g., cleaners, solvents, oils, paints, fuel, etc.) would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials. Therefore, potential impacts would be *less than significant with mitigation.*

c) The project site is located within 0.25 mile of San Luis Obispo High School and the San Luis Coastal Adult School. As described in Section 3, Air Quality, while the project would not result in construction emissions in exceedance of SLOAPCD thresholds, local concentrations of air pollutants may have the potential to negatively affect nearby sensitive receptors. Mitigation Measures AQ-1 through AQ-3 have been identified to reduce DPM and fugitive dust emissions

generated during the construction period. With implementation of these measures, potential impacts associated with hazardous emissions in proximity to nearby school facilities would be *less than significant with mitigation*.

d) Based on a review of the SWRCB's GeoTracker database and the DTSC's EnviroStor database, the project site is not located within an active hazardous waste cleanup site. The closest active investigation site is a Cleanup Program Site located approximately 850 feet to the north of the project parcel on San Luis Drive. Therefore, potential impacts would be *less than significant.*

e) The project site is located approximately 2.3 miles north of the San Luis Obispo County Regional Airport. Based on the Airport Land Use Plan (ALUP) for the San Luis Obispo County Regional Airport, the project is not located within the Airport Land Use Planning Area or noise contours. Therefore, potential impacts associated with safety hazards or excessive noise from aircraft would be *less than significant.*

f) The project would not result in any temporary or long-term road closures. The project site is not identified as a Safe Refuge Area in the City of San Luis Obispo Fire Evacuation Plan, and all existing hospital facilities would remain in operation during project construction. Therefore, project implementation would not result in a significant temporary or permanent impact on any adopted emergency response plans or emergency evacuation plans. Therefore, potential impacts would be *less than significant*.

g) The project is not located within or adjacent to a wildland area. The project is located within a developed area of the city of San Luis Obispo. The project would be required to demonstrate compliance with all applicable fire safety rules and regulations including the California Fire Code and PRC prior to issuance of building permits; therefore, potential impacts would be *less than significant.*

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-4, BR-6, and BR-8.

Conclusion

The project does not propose the routine transport, use, handling, or disposal of hazardous substances. The project site is not located within close proximity to a known hazardous waste investigation site or within an airport influence area. Project implementation would not subject people or structures to substantial risks associated with wildland fires and would not impair implementation or interfere with any adopted emergency response or evacuation plan. Potential impacts associated with accidental spills would be reduced to less than significant with implementation of mitigation measures identified above. Therefore, potential impacts associated with hazards and hazardous materials would be less than significant with mitigation incorporated.

10. HYDROLOGY AND WATER QUALITY

Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	36, 37, 39	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	40	☐	☐	☒	☐
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:					

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Result in substantial erosion or siltation on or off site;	1, 39	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	1, 39	☐	☐	☒	☐
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	1, 39	☐	☐	☒	☐
iv. Impede or redirect flood flows?	1, 38, 39	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	38, 41	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	36, 37, 39, 40	☐	☐	☒	☐

Evaluation

The project site is located within the San Luis Obispo Creek watershed. The San Luis Obispo Creek watershed is an approximately 53,271-acre coastal basin in southern San Luis Obispo County. It rises to an elevation of about 2,500 feet above sea level in the Santa Lucia Range. San Luis Obispo Creek flows to the Pacific Ocean and has six major tributary basins: Stenner Creek, Prefumo Creek, Laguna Lake, East Branch San Luis Obispo Creek, Davenport Creek, and See Canyon (source reference 36).

The San Luis Obispo Creek watershed is physiographically and geologically diverse. Areas within the watershed are grouped into Watershed Management Zones (WMZ) based on physical attributes. The project site is located within a WMZ 3 area, which is characterized by flat areas of the region underlain by old, generally impervious rocks with minimal deep infiltration and not overlaying mapped groundwater basins. This WMZ is quite prevalent throughout the eastern part of the city of San Luis Obispo (source reference 37).

The City is enrolled in the State General Permit NPDES permit program governing stormwater. As part of this enrollment, the City is required to implement the Central Coast RWQCB's adopted Post Construction Stormwater Management requirements through the development review process. The primary objective of these post-construction requirements is to ensure that the permittee is reducing pollutant discharges to the maximum extent practicable and preventing stormwater discharges from causing or contributing to a violation of receiving water quality standards in all applicable development projects that require approvals and/or permits issued.

The 100-year flood zone identifies areas that would be subject to inundation in a 100-year storm event, or a storm with a 1% chance of occurring in any given year. Based on the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer, no portion of the project site is located within the 100-year flood zone. However, a northern portion of the project site is overlayed by a 0.2% annual chance flood hazard zone (source reference 38).

In 2015 the State legislature approved the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans.

The 1993 FHMP MND evaluated surface water flow and quality and did not identify any potentially significant impacts or mitigation measures.

a) Projects that disturb 1 acre of soil or more are required to obtain NPDES coverage under the NPDES General Permit, Order No. 2009-0009-DWQ. The General Permit requires the development and implementation of a SWPPP, which includes BMPs to collect and treat stormwater runoff, including measures to prevent soil erosion. Because more than 1 acre

of land would be disturbed during the construction phase of the project, the applicant would be required to prepare a SWPPP and obtain a storm water permit from the RWQCB.

The project is located within a developed infill site and would be constructed within existing paved areas. The proposed new improvements would drain to an existing stormwater basin that was designed to attenuate the peak runoff rate for the full build out of the hospital. Parking stalls would be constructed using pervious pavers with a gravel section beneath them that would store runoff and allow percolation into native soil underneath them. In addition, downspouts from proposed development would outlet to raised planters which would filter stormwater runoff and direct the treated runoff to the onsite basin. The project would result in over 22,000 square feet of impervious surfaces and is therefore required to meet performance requirements 1 through 4 of the Central Coast RWQCB's adopted Post Construction Stormwater Management requirements. Based on an evaluation conducted by Ashley and Vance Engineering, Inc. the project design features would be sufficient to meet performance requirements 1, 2, and 4, and the project would be exempt from Performance requirement 3 due to its location in WMZ 3.

While there are no mapped sensitive natural communities documented within or immediately adjacent to the proposed area of disturbance, the project site supports a creek located within the southwest portion of the project site within the existing open space easement and a creek located within the northern portion of the project site, also within the open space easement. Proposed project grading, tree removals, and excavation activities may have the potential to result in soil erosion and/or siltation that may affect the on-site drainage. Mitigation Measures BR-6 through BR-9 have been identified to require preparation of a hazardous materials response plan, monitoring of erosion control measures, setback distances for equipment refueling, and trash collection to prevent impacts to proximate drainage and vegetated areas within the project site. In addition, Mitigation Measure BR-5 requires installation of silt fencing between proposed disturbance areas and natural habitat areas on-site. Therefore, potential impacts would be *less than significant with mitigation*.

b) The project would be serviced by the City's water system, which has four primary water sources, including Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water (for irrigation), with groundwater serving as a fifth supplemental source. The City no longer draws groundwater for potable purposes as of 2015. Stormwater flows within the project site would be detained within the site to allow for percolation back into the groundwater table; therefore, the increase in impervious surface area would not decrease groundwater supplies or interfere substantially with groundwater recharge in the project vicinity. Therefore, the project would not deplete groundwater resources, and impacts would be *less than significant.*

c.i-iii) The project site is generally flat and does not pose a substantial risk to downslope runoff, sedimentation, erosion, or runoff. As discussed in Section 7, Geology and Soils, the project would be required to implement a SWPPP with BMPs to stormwater runoff, including measures to prevent soil erosion. Therefore, the project would not have the potential to result in substantial erosion or siltation on- or off-site.

As discussed under Threshold 10.a, above, the proposed new improvements would drain to an existing stormwater basin that was designed to attenuate the peak runoff rate for the full build out of the hospital. The project includes stormwater collection and treatment features to satisfy performance regulations required by the Central Coast RWQCB's adopted Post Construction Stormwater Management requirements. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding or exceed the capacity of existing or planned stormwater drainage systems or result in a substantial additional source of polluted runoff. Therefore, potential impacts would be *less than significant.*

c.iv) The 100-year flood zone identifies areas that would be subject to inundation in a 100-year storm event, or a storm with a 1% chance of occurring in any given year. Based on the FEMA National Flood Hazard Layer Viewer, no portion of the project site is located within the 100-year flood zone. However, a northern portion of the project site is overlayed by a 0.2% annual chance flood hazard zone. However, project components in this area would consist of driveway improvements including repaving and restriping to accommodate the entrance to the new patient tower. Based on the infrequent nature of the flood zone and location of proposed structures outside of it, potential impacts associated with impeding or redirecting flood flows would be *less than significant*.

d) As described above, a portion of the proposed driveway improvements would be located within a 0.2% annual chance flood hazard zone. In the event of inundation of the proposed driveway, no release of hazardous materials or other pollutants would occur. Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami. The project site is not located within close proximity to a standing body of water with the potential for a seiche to occur. Therefore, potential impacts would be *less than significant.*

e) As discussed in the threshold analysis above, the project would not deplete groundwater supplies, or interfere substantially with groundwater recharge. The project includes stormwater treatment and storage facilities and would not conflict with the Central Coastal Basin Plan, or other water quality control plans. The project would not conflict with SGMA, or other local or regional plans or policies intended to manage water quality or groundwater supplies; therefore, potential impacts would be *less than significant.*

Mitigation Measures

Implement Mitigation Measures BR-5 through BR-9.

Conclusion

With implementation of standard BMPs, proposed stormwater control design features, and City Engineering Standards, the project would not substantially alter drainage patterns or impede or redirect flood flows. The project would not substantially increase impervious surfaces and does not propose alterations to existing water courses. With implementation of mitigation measures identified above, the project would not violate water quality standards or substantially degrade surface or groundwater quality. Therefore, upon implementation of Mitigation Measures BR-5 through BR-9, potential impacts related to hydrology and water quality would be less than significant.

11. LAND USE AND PLANNING

Would the project:					
a) Physically divide an established community?	1	☐	☐	☐	☒
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?	1, 2, 12, 57	☐	☒	☐	☐

Evaluation

The project is located within the Office General Plan Designation and the Office (O) zone. Surrounding zoning and land uses are summarized below :

- **North:** Breck Street and Fairview Street, single-family residential neighborhood in Medium-High Density Residential (R-3) zoning, and multi-family residential housing in Medium-Density Residential (R-2) zoning
- **East:** Johnson Avenue, single-family and multi-family residential neighborhood in R-2 zoning
- **South:** Iris Street, George Street, Ella Street, single-family and multi-family residential neighborhood in R-2 zoning
- **West:** Railroad, multi-family residential neighborhood in R-3 zoning

a) The proposed project would add additional hospital facilities within the existing hospital master plan area. The proposed infill development would not result in a physical division between an established community. The project would be consistent with the general level of development within the project vicinity and would not create, close, or impede any existing public or private roads, or create any other barriers to movement or accessibility within the community. Therefore, the proposed project would not physically divide an established community and *no impacts* would occur.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

b) The project would be consistent with the property's land use designation and the guidelines and policies for development within the applicable land use designation and other Land Use Element policies. The project would be considered infill development and would be compatible with existing surrounding development.

The COSE includes various goals and policies to maintain, enhance, and protect natural communities within the City's planning area. These policies include, but are not limited to, protection of listed species and species of special concern, preservation of existing wildlife corridors, protection of significant trees, maintaining development setbacks from creeks, and protection of both known and potential archaeological resources. Mitigation Measures BR-1 and BR-2 have been identified to reduce potential impacts to special-status species and their habitats to less than significant. The site does not provide significant value as a wildlife corridor and all tree removal and compensatory plantings would be conducted in accordance with the City's Tree Ordinance. Based review of the deep creek ravine to the south of the project site, and as documented in the Biological Resources Assessment (source reference 57) noted above, the limits of CDFW jurisdiction would extend to the top of the ravine as the extent of riparian habitat, and development within the associated 20-foot creek setback requires consideration of findings pursuant to Zoning Regulations Section 17.70.030 (Creek Setbacks). Structural development associated with the project would be located outside of riparian habitat, and within areas currently disturbed by past grading and development associated with the existing campus. Mitigation Measure BR-5 outlines the creek and riparian habitat protection measures that would be required to be implemented to further avoid and minimize potential impacts to the creek. Mitigation measures BR-6 through BR-9 have been identified to require preparation of a hazardous materials response plan, monitoring of erosion control measures, setback distances for equipment refueling, and trash collection to further prevent impacts to proximate drainage and sensitive riparian areas within the project site. Mitigation measures CR-1 through CR-3 have been identified to avoid impacts to unknown archaeological resources. Therefore, potential impacts associated with consistency with land use plans adopted for the purpose of mitigating environmental effects would be *less than significant with mitigation.*

Mitigation Measures

Implement Mitigation Measures BR-1 and BR-2, BR-6 through BR-9, and CR-1 through CR-3.

Conclusion

The project would not result in the physical division of an established community. With implementation of mitigation measures identified above, the project would be consistent with applicable plans and policies intended to address environmental impacts, including the Land Use Element and COSE. Therefore, impacts associated with land use and planning would be less than significant with mitigation incorporated.

12. MINERAL RESOURCES

Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	2	☐	☐	☐	☒
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?	2	☐	☐	☐	☒

Evaluation

Based on the City COSE, mineral extraction is prohibited within city limits.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

a-b) No known mineral resources are present within the project site and future extraction of mineral resources is very unlikely due to the urbanized nature of the area. Therefore, *no impacts* would occur.

Mitigation Measures

None necessary.

Conclusion

No impacts to mineral resources were identified; therefore, no mitigation measures are necessary.

13. NOISE

Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	42, 43	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	43	☐	☐	☒	☐
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?	34	☐	☐	☒	☐

Evaluation

The City's General Plan Noise Element sets noise exposure standards for the determination of land use compatibility for new noise-sensitive land uses and establishes performance standards for new transportation and non-transportation noise sources. The City's noise standards for transportation noise sources are summarized in Table 10 and the City's General Plan noise standards for non-transportation noise sources are summarized in Table 11.

Table 10. City of San Luis Obispo General Plan Maximum Noise Exposure for Noise-Sensitive Uses Due to Transportation Noise Sources

Land Use	Outdoor Activity Areas ($CNEL/L_{dn}$)[1,2]	Interior Spaces	
		$CNEL/L_{dn}$[2]	L_{eq}[3]
Residences, hotels, motels, hospitals, nursing homes	60	45	--
Theaters, auditoriums, music halls	--	--	35
Churches, meeting halls, office building, mortuaries	60	--	45
Schools, libraries, museums	--	--	45
Neighborhood parks	65	--	--
Playgrounds	70	--	--

Note: CNEL = Community Noise Equivalent Level, L_{dn} = day-night average level

[1] If the location of outdoor activity areas is not shown, the outdoor noise standard shall apply at the property line of the receiving land use.

[2] L_{dn} (day-night average level) is the energy-averaged sound level measured over a 24-hour period, with a 10-dB penalty assigned to noise events occurring between 10:00 PM and 7:00 AM and a 5-dB penalty assigned to noise events occurring between 7:00 PM and 10 PM.

[3] L_{eq} (equivalent sound level) is the constant or single sound level containing the same total energy as a time-varying sound, over a certain time. If the location of outdoor activity areas is not shown, the outdoor noise standard shall apply at the property line of the receiving land use.

Source: City of San Luis Obispo 1996

Table 11. City of San Luis Obispo General Plan Maximum Noise Exposure for Noise-Sensitive Uses Due to Stationary Noise Sources

Duration	Day (7:00 a.m. to 10:00 p.m.)	Night (10:00 p.m. to 7:00 a.m.)
Hourly (dBA L_{eq})[1,2]	50	45
Maximum (dBA L_{max})[1,2]	70	65
Impulsive (dBA L_{max})[1,3]	65	60

Note: dBA = A-weighted decibels; L_{eq} = equivalent sound level; L_{max} = maximum sound level

[1] As determined at the property line of the receiver. When determining the effectiveness of noise mitigation measures, the standards may; be applied on the receptor side of noise barriers or other property-line noise mitigation measures.

[2] Sound level measurements shall be made with slow meter response.

[3] Sound level measurements shall be made with fast meter response.

Source: City of San Luis Obispo 1996

The City's Noise Control Ordinance is contained in Municipal Code, Chapter 9.12. Section 9.12.050 and specifies noise standards for various categories of land use. Maximum sound levels from mobile equipment are limited to 75 A-weighted decibels (dBA) at single-family residential, 80 dBA at multi-family residential, and 85 dBA for mixed residential/commercial land uses. Except for emergency repair of public service utilities, or where an exception is issued by the City, construction activities are typically limited to the hours between 7:00 a.m. and 7:00 p.m. and are prohibited on Sundays and holidays. For instantaneous noise events, the City also limits interior noise levels at noise-sensitive land uses to 60 dBA maximum sound level (L_{max}).

Vibration can be measured in terms of acceleration, velocity, or displacement. Measurements in terms of velocity are expressed as peak particle velocity (PPV) with units of inches per second (in/sec). There are no federal, state, or local regulatory standards for groundborne vibration. However, Caltrans has developed vibration criteria based on potential structural damage risks and human annoyance. The threshold at which there is a risk to normal structures from continuous events is 0.3 in/sec PPV for older residential structures and 0.5 in/sec PPV for newer building construction. With regard to human perception, vibration levels would begin to become distinctly perceptible at levels of 0.04 in/sec PPV for continuous events. Continuous vibration levels are considered potentially annoying for people in buildings at levels of 0.2 in/sec PPV.

a) ***Exposure to Construction Noise***

Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Although noise ranges were found to be similar for all construction phases, the initial site preparation phase tends to involve the most equipment. As noted in Table 12, noise levels generated by individual pieces of construction equipment typically range from approximately 77 to 90 dBA L_{max} at 50 feet.

Table 12. Typical Construction Equipment Noise Levels

Equipment	Noise Level (dBA at 50 feet)	
	L_{max}	L_{eq}
Backhoes	78	74
Bulldozers	82	78

Compressors	78	74
Cranes	81	73
Concrete Pump Truck	81	74
Drill Rigs	79	72
Dump Trucks	77	73
Excavator	81	77
Generator	81	78
Gradall	83	79
Grader	85	81
Hydraulic Break Rams	90	80
Front End Loaders	79	75
Pneumatic Tools	85	82
Pumps	81	78
Rollers	80	73
Scrapers	84	80
Tractor	84	80

Based on measured instantaneous noise levels (L_{max}), average equipment usage rates, and calculated average-hourly (Leq) noise levels derived from the Federal Highway Administration (FHWA) Road Construction Noise Model.

Assuming a minimum noise attenuation rate of 6 dB per doubling of distance from the source and the equipment noise levels noted above, construction-related noise levels could reach 75 dBA equivalent sound level (L_{eq}) at approximately 120 feet. Instantaneous noise levels could reach 75 dBA L_{max} at 295 feet.

Based on the exterior noise levels noted above and assuming an average exterior-to-interior noise reduction of 25 dBA, predicted interior noise levels of noise-sensitive buildings (e.g., classrooms, offices) located within approximately 200 feet of construction sites could potentially exceed the commonly applied interior noise standard of 45 dBA L_{eq}. With regard to residential land uses, noise levels associated with construction activities occurring during the more noise-sensitive evening and nighttime hours (i.e., 7:00 p.m. to 7:00 a.m.) are also of increased concern. Because exterior ambient noise levels typically decrease during the evening and nighttime hours, as community activities (e.g., commercial activities, vehicle traffic) decrease, construction activities performed during these more noise-sensitive periods of the day can result in increased annoyance and potential sleep disruption for occupants of nearby residential dwellings.

Mitigation Measure N-1 has been identified to require implementation of noise-control measures including, but not limited to, limiting hours of construction to between 7:00 a.m. and 7:00 p.m. Monday through Saturday, where possible, maintaining and equipping equipment with exhaust mufflers per the manufacturers' recommendations, and locating stationary noise sources at the furthest distance from noise sensitive uses. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more. With mitigation and given that construction would be short-term, potential impacts associated with a substantial temporary increase in ambient noise levels would be *less than significant with mitigation.*

Exposure to Increased Stationary Source Noise

Noise sources commonly associated with proposed future facilities would include occasional parking lot activities (e.g., opening and closing of vehicle doors, people talking), and use of onsite building equipment, such as HVAC systems, boilers, and power generators.

Vehicle Parking Lot

The proposed project includes the construction of an 82-space parking structure. Based on a conservative assumption that all parking spaces would to be accessed over a one-hour period, predicted noise levels at the nearest residential land use would be 29 dBA L_{eq}, or less. Predicted operational noise levels would not exceed the City's noise standards and would be largely masked by ambient noise conditions and therefore associated noise impacts related to the proposed vehicle parking lot would be *less than significant*.

Building Mechanical Equipment

The proposed patient tower would result in increased stationary source noise levels, primarily associated with building mechanical equipment (e.g., heating ventilation and air handling/cooling systems). Detailed information regarding the equipment to be installed is not yet available. However, based on noise measurement data for similar commercial-use air handling and cooling systems, operational noise levels would be approximately 78 dBA at 3 feet. Building equipment, such as HVAC systems and boilers, would be located within the interior of the structure or on the rooftop and shielded from direct public exposure. The rooftop mechanical equipment area would be located approximately 68 feet above ground level and enclosed by an approximate 10-foot-high barrier.

The nearest noise-sensitive land use is a residential dwelling located approximately 50 feet south of the proposed patient tower. Based on this distance and the operational noise levels noted above, predicted operational noise levels at this nearest residence would be approximately 43 dBA L_{eq}, or less. Predicted operational noise levels would not exceed the City's noise standards and would be largely masked by ambient noise conditions. As a result, this impact would be *less than significant*.

Emergency Back-Up Generators

Two emergency generators are proposed within the proposed exterior mechanical yard. The operation of emergency generators is typically limited to occasional maintenance and testing, which typically occurs monthly for periods of approximately five to ten minutes. During emergency use, the generators may run for an indefinite period. Based on representative noise data provided by the generator manufacturer operational noise levels for each generator would be approximately 76–81 dBA at 23 feet. The proposed mechanical yard would be enclosed by a 10-foot concrete masonry unit (concrete block) wall, which would reduce noise levels by approximately 8 dBA.

The nearest noise-sensitive location is an existing residential dwelling located approximately 135 feet to the south. Based on this distance, the operational noise levels noted above, and assuming that the generators were to run continuously over a one-hour period, the highest predicted noise levels at this nearest residence would be 59 dBA L_{eq}. These operational conditions would be predominantly limited to periods of emergency use. During normal maintenance and testing periods, during which generator operations would typically occur for periods of approximately 5-10 minutes during the daytime hours, predicted noise levels at the nearest residential land use would be less than 45 dBA L_{eq}. The use of back-up power generators for emergency purposes is exempt from the City's noise ordinance requirements. Nonetheless, given that predicted operational noise levels during routine maintenance and testing periods could potentially exceed the City's noise standards, this impact would be potentially significant.

Mitigation Measure N-2 would require backup power generators to be enclosed within a sound-attenuated container in accordance with manufacturer recommendations. Based on representative data for similar generators/enclosures, predicted operational noise levels would be reduced to approximately 75 dBA at 23 feet. With mitigation, predicted operational noise levels at the nearest residential land use would be reduced to approximately 50 dBA L_{eq}. Operational noise levels associated with routine maintenance and testing activities would not be projected to exceed the City's daytime or nighttime noise standards of 50 and 45 dBA L_{eq}, respectively. Therefore, this impact would be *less than significant with mitigation.*

Exposure to Increased Roadway Traffic Noise

Implementation of the proposed project would result in increased traffic volumes on some area roadways. The increase in traffic volumes resulting from implementation of the proposed project would, therefore, contribute to predicted increases in traffic noise levels. Based on existing traffic data collected per the Focused Multimodal Transportation Analysis prepared for the project and results generated from the Federal Highway Administration (FHWA) roadway noise prediction model (FHWA-RD-77-108), implementation of the proposed project would result in predicted increases in traffic noise

levels of approximately 0.3 dBA, or less, along primarily affected area roadway segments. Perceptible changes in ambient noise levels do not typically occur at levels below 3 dBA. Based on the modeling conducted, implementation of the proposed project would not result in a significant increase in traffic noise levels at nearby noise-sensitive land uses. As a result, this impact would be *less than significant*.

Exposure to Helicopter Noise

Helicopters produce a unique sound that is easily recognizable. While modern light- and medium-weight civil helicopters are much quieter than older helicopters and much quieter than heavy military helicopters, they can become the focus of much community concern.

Helicopter noise levels were calculated using the SoundPLAN noise model based on flight path information provided for the proposed helipad. Helicopter operations were distributed over a 24-hour period for calculation of average-daily operational noise levels. Seventy percent of flights were assumed to occur during daytime hours (i.e., 7:00 a.m. to 7:00 p.m.); 15% of flights during evening hours (i.e., 7:00 p.m. to 10:00 p.m.); and 15% of flights during nighttime hours (i.e., 10:00 p.m. to 7:00 a.m.). Modeling was based on a total of approximately 50 flights per year, averaging approximately four flights per month.

Predicted average-daily noise levels with helicopter operations are depicted in Figure 19 and predicted increases in existing noise levels are summarized in Table 13.

Figure 19. Predicted Existing Average-Daily Noise Levels with Helicopter Operations

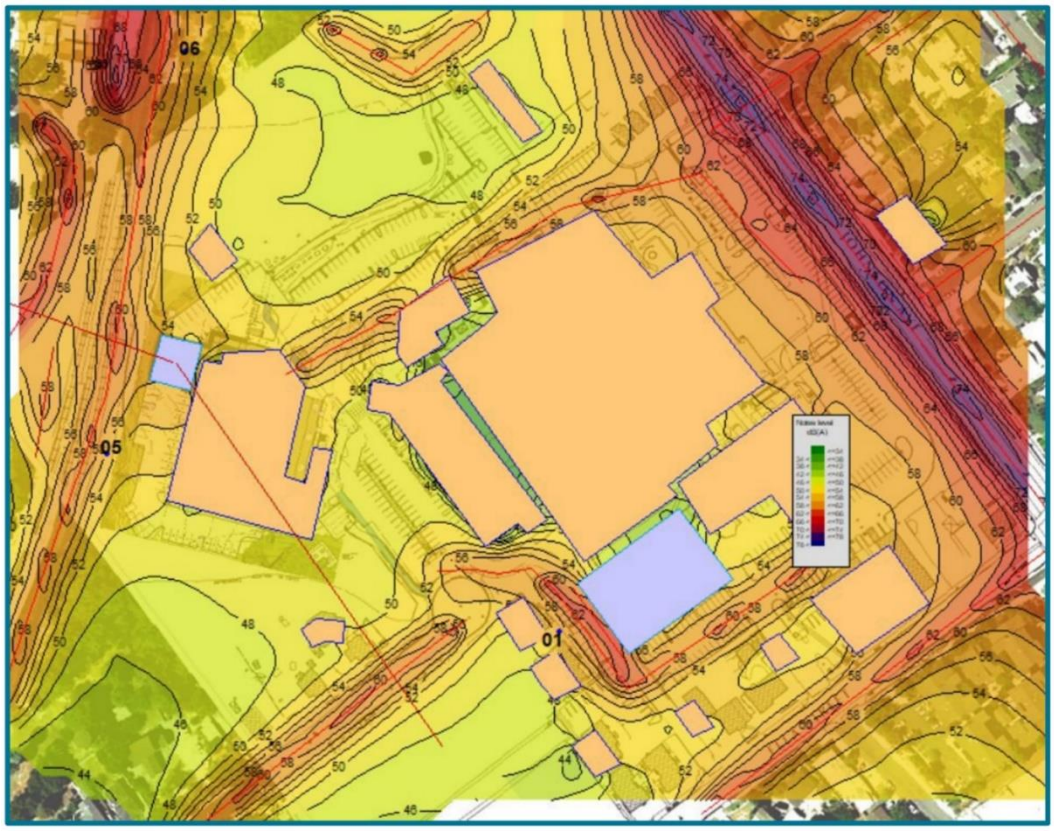


Table 13. Predicted Increases in Ambient Noise Levels with Helicopter Operations

Location	Average Daily Noise Levels (dBA CNEL)			Average Hourly Noise Levels (dBA L_{eq})		
	Existing	Existing Plus Helicopter	Increase with Helicopter	Existing	Existing Plus Helicopter	Increase with Helicopter
01	56	56	None	55	55	0.1
05	54	55	1	53	54	1
06	58	58	None	54	54	None
08	57	57	None	55	55	None

See Figure 19 for noise-prediction locations.

Source Reference 38.

Based on the modeling conducted and comparison to existing average-daily noise levels, the proposed helipad would result in an estimated increase in average-daily noise levels of approximately 1 dBA CNEL at residences located nearest the proposed helipad. Predicted increases in noise levels at other nearby noise-sensitive land uses would be negligible. Noise associated with helicopter flights would be detectable at nearby noise-sensitive land uses, including residential land uses located near the flight path (see Figure 15 of Attachment 2), for short-periods of time (e.g., minutes). However, in comparison to existing ambient noise conditions, short-term noise levels would not be uncharacteristic of similar existing noise events that occur in the project area, such as train pass-bys and ambulance and other emergency vehicle sirens. For this reason and given that exposure to helicopter noise would be intermittent and short-term and would not result in a significant increase in average-daily noise levels, this impact would be *less than significant.*

Based on the analysis provided above, the project would have the potential to result in temporary substantial increases in ambient noise levels associated with construction activities and long-term increases in ambient noise levels associated with proposed emergency back-up generators. With implementation of Mitigation Measures N-1 and N-2, potential impacts would be *less than significant with mitigation.*

b) No existing major stationary sources of groundborne vibration were identified within the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. During operation, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, construction activities associated with the proposed project would require the use of various tractors, trucks, and jackhammers that could result in intermittent increases in groundborne vibration levels. Groundborne vibration levels commonly associated with construction equipment ranges between 0.003 and 0.089 in/sec PPV. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of future onsite land uses. Predicted groundborne vibration levels would not exceed the minimum recommended criteria for structural damage or human annoyance (0.2 in/sec PPV) at nearby land uses. Therefore, potential impacts associated with ground-borne vibration would be *less than significant.*

c) The nearest commercial use airport is the San Luis Obispo County Regional Airport, which is generally located approximately 2.3 miles south of the hospital campus. Implementation of the proposed project would not affect airport operations, nor would implementation of the proposed Master Plan result in the development or relocation of any noise-sensitive land uses in proximity to an airport or airstrip. As a result, implementation of the proposed patient tower, parking deck, helistop, generator yard, and other project components would not result in increased exposure of individuals to excessive aircraft noise levels associated with the existing airport. In addition, there are no existing private airstrips located within two miles of the campus. Therefore, potential impacts would be *less than significant.*

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Mitigation Measures

N-1 The following measures shall be implemented to reduce short-term construction noise impacts:

1. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. Construction activities would be prohibited on Sundays and legal holidays.
2. Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations.
3. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.
4. Stationary noise sources such as generators or pumps shall be located at the furthest distance possible from noise sensitive uses.
5. No less than 1 week prior to the start of construction activities at a particular location, notification shall be provided to nearby noise-sensitive land uses (e.g., residences) that are located within 200 feet of the construction site.

N-2 Backup power generators shall be enclosed within a fully-enclosed sound-attenuated container in accordance with manufacturer recommendations.

Conclusion

The project would have the potential to result in temporary substantial increases in ambient noise levels associated with construction activities and long-term increases in ambient noise levels associated with proposed emergency back-up generators. With implementation of mitigation measures identified above, potential impacts associated with noise would be less than significant with mitigation incorporated.

14. POPULATION AND HOUSING

Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	1, 44, 45	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	1	☐	☐	☒	☐

Evaluation

San Luis Obispo is the largest city in terms of population in San Luis Obispo County and has grown from 45,119 in 2010 to approximately 47,302 in 2019 according to the U.S. Census Bureau. The City's housing tenure is approximately 39% owner occupied and 61% renter occupied, which is strongly influenced by California Polytechnic State University, San Luis Obispo (Cal Poly) and Cuesta College enrollment. Many segments of the city's population have difficulty finding affordable housing within the city due to their economic, physical, or sociological circumstances. San Luis Obispo contains the largest concentration of jobs in the county and the city's population increases to an estimated 70,000 persons during workdays.

Based on final building permits, 34,352 square feet of net new non-residential floor area was added to the city in 2020, resulting in an annual growth rate of 0.29%. Land Use Element Policy 1.11.4 states that each year, the Council will evaluate the actual

increase of non-residential floor area over the preceding five years and consider establishing limits for the rate of non-residential development if the increase exceeds 5%. The City Council has adhered to this policy and has decided against establishing limits (source reference 45).

The City Housing Element 2020-2028 identifies various goals, policies, and programs based on an assessment of the City's housing needs, opportunities, and constraints. The City's overarching goals for housing include ensuring safety and affordability, conserving existing housing, accommodating for mixed-income neighborhoods, providing housing variety and tenure, planning for new housing, maintaining neighborhood quality, providing special needs housing, encouraging sustainable housing and neighborhood design, maximizing affordable housing opportunities for those who live or work in the city, and developing housing on suitable sites.

a) The project would expand existing hospital facilities within an existing hospital site. The project would not result in the development of any additional residential uses or remove any existing barriers to future development of residential uses. Therefore, potential impacts would be *less than significant.*

b) Proposed development of a patient tower, parking deck with a helistop, and generator yard would occur within existing parking areas of the French Hospital Medical Center. The project would not result in the displacement of existing housing or otherwise displace people and necessitate the construction of replacement housing; therefore, potential impacts would be *less than significant*.

Mitigation Measures

None necessary.

Conclusion

No impacts associated with population or housing were identified; therefore, no mitigation measures are necessary.

15. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
Fire protection?	46, 47	☐	☐	☒	☐
Police protection?	47	☐	☐	☒	☐
Schools?	47	☐	☐	☒	☐
Parks?	47	☐	☐	☒	☐
Other public facilities?	47	☐	☐	☒	☐

Evaluation

The project site is located within the existing service area of the City of San Luis Obispo Fire Department (SLOFD). The SLOFD deploys resources and personnel from four fire stations in order to maintain the response time goal of 4 minutes travel time to 95% of all emergencies. The nearest City fire station to the project site is City Fire Station 1, located at 2160 Santa Barbara Avenue, approximately 1 mile southwest of the project site. City Fire Station 1 is the newest station in the city and provides

primary response to downtown sections of San Luis Obispo. This station is staffed by a Battalion Chief and a 4-person paramedic truck company.

The City's Police Department (SLOPD) provides public safety services for the city and is comprised of 85.5 employees, 59 of which are sworn police officers. The SLOPD operates out of one main police station which is located at 1042 Walnut Street at the intersection of Santa Rosa (Highway 1) and US 101. The project site is located within the San Luis Coastal Unified School District (SLCUSD) and public parks and recreation trails within the city are managed and maintained by the City's Department of Parks and Recreation.

All new residential and non-residential development within the city is subject to payment of Development Impact Fees, which are administered by and paid through the Community Development Department. Development Impact Fees provide funding for maintaining city emergency services, infrastructure, and facilities. For example, fire protection impact fees provide funding for projects such as the renovation of the City's fire stations and the replacement of fire service vehicles and equipment.

The 1993 FHMP MND evaluated potential impacts to public services, and no potentially significant impacts or mitigation measures were identified.

a) **Fire protection:** The project would be served by the SLOFD, the closest station of which is Station 1, located at 2160 Santa Barbara Avenue. The project proposes uses generally consistent with the existing hospital and the surrounding residential and commercial areas (from a fire protection demand perspective). While the project would not directly result in the need for construction of new or expanded fire service facilities, project development of expanded hospital facilities would result in a marginal cumulative increase of demand on City services, including fire protection. The project would be required to participate in the City's system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development. Potential increases in property tax revenue associated with valuation of the new residential units, businesses, and other revenues (e.g., sales tax) would also help offset the increased ongoing cost of provision of public services to new residential and commercial uses. Therefore, impacts associated with the provision of new or physically altered SLOFD facilities would be *less than significant.*

Police protection: The project would be served by the SLOPD. Project development of the proposed hospital uses would result in an increase of demand on City services, including police protection. The project proposes uses generally consistent with the existing hospital facilities on-site and surrounding residential and commercial areas (from a police protection demand perspective). While the project would not directly result in the need for construction of new or expanded police service facilities, project development of expanded hospital facilities would result in a marginal cumulative increase of demand on City services, including police protection. The City has a system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development. Potential increases in property tax revenue associated with valuation of the new residential units, businesses, and other revenues (e.g., sales tax) would also help offset the increased ongoing cost of provision of public services to new residential and commercial uses. Therefore, impacts associated with the provision of new or physically altered police protection facilities would be *less than significant.*

Schools: While the project would not result in a direct increase in population, the project site would be located within the SLCUSD and would be subject to payment of SLCUSD developer fees to offset the potential indirect marginal increase in student attendance in the SLCUSD's schools as a result of the project. These fees would be directed towards maintaining sufficient service levels, which include incremental increases in school capacities. Through participation in this fee program, potential project impacts on schools would be *less than significant.*

Parks: While the project would not result in a direct increase in population, the project would result in an increase of employees and patients on-site which may result in a marginal increase in local park usership. The project would be subject to park development impact fees, which would offset the project's contribution to increased demand on park and recreational facilities. Through participation in this fee program, potential project impacts on parks would be *less than significant.*

Other public facilities: The project may result in a marginal indirect increase in use of other City public facilities, such as roadways and public libraries. The project would be subject to transportation development impact fees, which would

offset the project's contribution to increased use of City roadways. Through participation in this fee program, potential project impacts on schools would be *less than significant.*

Mitigation Measures

None necessary.

Conclusion

The project would not result in significant impacts to public services; therefore, no mitigation measures are necessary.

16. RECREATION

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?	1, 48	☐	☐	☒	☐
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?	1	☐	☐	☒	☐

Evaluation

Existing City recreational facilities consist of 28 parks and recreational facilities, in addition to 10 designated natural resources and open space areas and two bike trails. The City Parks and Recreation Element identifies goals, policies, and programs to help plan, develop, and maintain community parks and recreation facilities. The City's statement of overall department goals is for the City Parks and Recreation facilities and programs to enable all citizens to participate in fun, healthful, or enriching activities which enhance the quality of life in the community.

As demand for recreation facilities and activities grow and change, the City intends to focus its efforts in the following areas: continued development of athletic fields and support facilities, providing parks in underserved neighborhoods, providing a multi-use community center and therapy pool, expanding paths and trails for recreational use, link recreation facilities, and meeting the special needs of disabled persons, at-risk youth, and senior citizens. City Parks and Recreation Element Policy 3.13.1 establishes the City's goal to develop and maintain a park system at the rate of 10 acres of parkland per 1,000 residents, 5 of which shall be dedicated as neighborhood parks.

a) The project would not result in the development of any additional residential uses or remove any existing barriers to future development of residential uses. The project would employ up to 45 new employees, which may result in a marginal increase in local park usership. However, based on the size and scope of proposed facilities, this slight increase in park usership would not have the potential to result in the acceleration of deterioration of an existing facility; therefore, potential impacts would be *less than significant.*

b) The project site currently supports a public bicycle path that traverses the existing open space easement and parking areas of the French Hospital Medical Center. Upon completion of the proposed facilities, the bicycle path would remain substantially unchanged and would not result in any new impacts to the environment. The project does not include the construction or expansion of any other recreational facilities. Therefore, potential impacts would be *less than significant.*

Mitigation Measures

None necessary.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Conclusion

The project would not result in significant impacts to recreational resources or facilities; therefore, no mitigation measures are necessary.

17. TRANSPORTATION

Would the project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	49, 50, 51, 52	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	53	☐	☒	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	1, 52	☐	☐	☒	☐
d) Result in inadequate emergency access?	1, 52	☐	☐	☒	☐

Evaluation

The City Circulation Element identifies current traffic levels and delays of public roadways and identifies transportation goals and policies to guide development and express the community's preferences for current and future conditions. Goals included in the plan include, but are not limited to, maintaining accessibility and protecting the environment throughout San Luis Obispo while reducing dependence on single-occupant use of motor vehicles, reducing use of cars by supporting and promoting alternatives such as walking, riding buses and bicycles, and using car pools, promotion of the safe operation of all modes of transportation, and widening and extending streets only when there is a demonstrated need and when the widening would cause no significant, long-term environmental problems.

The City Active Transportation Plan outlines the City's official policies and goals for the design and development of bikeways and other active transportation infrastructure within the city (and in adjoining territory under County jurisdiction but within the city's Urban Reserve Line) and includes specific objectives for reducing vehicle use and promoting active transportation modes.

SLO Transit operates transit service within the city of San Luis Obispo and San Luis Obispo Regional Transit Authority (SLORTA) operates transit service throughout San Luis Obispo County and adjacent areas. The nearest transit stops include the Johnson at Lizzie bus stop served by the 1A transit route and the 1B transit route. The 1A and 1B transit routes begin at the Downtown Transit Center and service stops along Broad Street and the San Luis Obispo County Regional Airport, as well as along Tank Farm Road, Laurel Lane, and Johnson Avenue.

In 2013 SB 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA, to be implemented statewide beginning on July 1, 2020 (as detailed in Section 15064.3[b]). In June 2020, the City formally adopted the transition from LOS to VMT for the purposes of CEQA evaluation and established local VMT thresholds of significance.

Approximately 80–90% of current traffic to the project site enters the project site from the signaled intersection at Johnson Avenue and Lizzie Street. Johnson Avenue is a four-lane northwest-southeast residential arterial with a center two-way left turn lane and a posted speed limit of 35 miles per hour within proximity to the project site and supports a Class II bicycle lane and non-buffered sidewalk in both directions of travel. The project site supports three additional vehicle access points, including two stop-controlled intersections on Ella Street along the southeast side of the property and one from Breck Street along the northwest side of the property. A driveway is also located at the Iris Street cul-de-sac; however, it is gated and restricts daily vehicular access. The project site also includes a bike path that is located from Breck Street on the north side of the property through the northern portion of the open space easement and parking areas on the western side of the property to the Iris Street cul-de-sac.

a) A Focused Multimodal Transportation Analysis for the project was prepared in accordance with the City of San Luis Obispo Multimodal Transportation Impact Study Guidelines. The proposed project is projected to generate 1,876 daily trips including 155 a.m. peak hour trips and 159 p.m. peak hour trips during a typical weekday. An analysis of the project's effects on surrounding intersections' LOS demonstrated that the intersection of Johnson Avenue and Lizzie Street/Hospital Driveway would be projected to degrade to LOS E during the PM Peak hour under the existing plus project condition.

Policy 6.1.2 of the City Circulation Element states that the City shall stive to achieve LOS D for vehicles in all areas of the city with the exception of Downtown and policy 6.1.4 states that if the level of service degrades below thresholds established in Policy 6.1.2, it shall be determined a significant impact for purposes of environmental review under CEQA. However, based on State CEQA Guidelines Section 15064.3, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, no potentially significant environmental impacts would occur as a result of potential inconsistency with Policies 6.1.2 and 6.1.4 of the City Circulation Element. All necessary circulation improvements associated with addressing automobile delay would be identified through the discretionary approval process and implemented through conditions of approval for the project.

While LOS is no longer considered an environmental impact under CEQA, actions associated with addressing LOS may result in a physical effect on the environment that could result in potentially significant impacts under CEQA. Based on the analysis provided in the Focused Multimodal Transportation Analysis prepared for the project, modification of the traffic signal at the intersection of Johnson Avenue and Lizzie Street/Hospital Way to provide eastbound (hospital driveway) and westbound (Lizzie Street) split phasing to increase the cycle length to 115 seconds would reduce p.m. peak hour LOS at this location to LOS D. A change in cycle length at the Johnson Avenue/Ella Street intersection would also be needed to maintain signal coordination. Because modification of the length of signal cycles would not result in a physical change to the environment that could result in significant environmental impacts, potential impacts associated with conflicting with vehicle circulation plans or policies would be less than significant.

Existing bicycle and pedestrian volumes were utilized to forecast the projected project bicycle and pedestrian volumes based on a ratio of anticipated use expansion. Based on projected bicycle and pedestrian volumes, the project would not result in bicycle or pedestrian LOS in exceedance of city goals. During construction, the bike path would be closed, and cyclists would have to use Ella Street and the Class II bicycle lanes along Johnson Avenue to travel from Breck Street to Iris Street and vice versa. Due to the relatively short length of the bike path closure and close proximity of an alternate route, this temporary detour is not anticipated to result in any significant delays in travel time or result in new safety concerns for cyclists. Upon completion of construction activities, the portion of the bike path that traverses the parking area would be shifted slightly to accommodate the proposed patient tower. The project would not result in any significant change to the existing bike path route location or length. The project would not result in any changes to existing pedestrian, bicycle, and/or transit facilities off-site. Therefore, potential impacts associated with a conflict with circulation plans or policies would be *less than significant*.

b) The proposed project was evaluated to determine if it would result in the generation of VMT in excess of City thresholds. Based on the City Guidelines, employment-based development, such as the proposed project, must result in VMT generation of 15% below the existing regional (County) average Work VMT per service population, or 17.43 VMT per service population in order to be considered less than significant. Based on the evaluation of the project using the City's Travel Demand Model, the project would result in 20.50 VMT per service population. Mitigation Measure ENG-1 has been identified to require implementation of TDM strategies until project VMT meets or falls below the City 17.43 VMT per service population threshold. In addition to implementing TDM measures, the project applicant may reduce VMT through implementation of off-site improvements, such as funding off-site pedestrian/bicycle/transit infrastructure or

increasing transit service frequency to and from the hospital through either private shuttle service or working with SLO Transit to increase their service frequencies. Mitigation Measure TR-1 identifies other types of improvements that reduce VMT that may also be considered with the approval of City Community Development and Public Works Transportation staff. With implementation of ENG-1 and TR-1, potential impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be *less than significant with mitigation.*

c) The project would result in the minor modification of internal circulation features on-site, including shifting the location of the existing internal roadway and bike path and reconfiguration of parking areas to accommodate the proposed patient tower and provide access to the proposed parking deck. All project development plans would be subject to review for consistency with City Public Works safety design standards prior to approval. Therefore, project impacts associated with increased hazards due to a geometric design feature would be *less than significant.*

d) The project has been designed to comply with the City and State Fire Code and the project would be subject to review by the City Fire Marshal to ensure adequate emergency access has been provided. Therefore, potential impacts related to inadequate emergency access would be *less than significant.*

Mitigation Measures

Implement Mitigation Measure ENG-1 and ENG-2.

TR-1 If project VMT per employee cannot be reduced to at or below the City's threshold of 17.43 VMT per service population, the applicant shall coordinate with City Public Works staff to provide funding for the implementation of transportation improvements or other measures that reduce local VMT, such as funding off-site pedestrian/bicycle/transit infrastructure, or increasing the service frequency to/from the hospital through either private shuttle service or working with SLO Transit to increase their service frequencies. Other types of improvements than reduce VMT may also be proposed, subject to the review and approval of the City Community Development and Public Works Departments.

Conclusion

The project would not result in any conflict with existing circulation plans, programs, or policies and would not increase hazards due to a geometric design feature or fail to provide adequate emergency access. Potential impacts associated with VMT would be reduced to less than significant with implementation of mitigation measures identified above. Therefore, potential impacts associated with transportation would be less than significant with mitigation incorporated.

18. TRIBAL CULTURAL RESOURCES

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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) 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)?	21	☐	☐	☒	☐
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	21	☐	☐	☒	☐

Evaluation

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

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

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

Native American Tribes were notified about the project consistent with City and State regulations under AB 52 on July 29, 2021.

a-b) The City has provided notice of the opportunity to consult to appropriate tribes per the requirements of AB 52 and received one response requesting to review the findings of Section 5, Cultural Resources, when drafted. As described in Section 5, Cultural Resources, a records search was requested from the CCIC of the CHRIS. The records search revealed that five reports have been prepared that included the project area and no resources have been identified within the project area. Within a 1/8-mile radius of the project area, 10 reports have been completed and one resource has been identified.

Native American Tribes were notified about the project consistent with City and State regulations on July 29, 2021. On July 29, Mona Olivas Tucker, the Chair of the yak tityu tityu yak tiłhini – Northern Chumash Tribe San Luis Obispo County and Region responded and requested to review a records search for the site. On November 12, 2021, the City provided copies of the records search conducted for the project site and its associated attachments. No response from Ms. Tucker has been received to date (December 13, 2021). No further response from other California Native American tribes has been received. Therefore, potential impacts related to a substantial adverse change in the significance of a tribal cultural resource would be *less than significant.*

Mitigation Measures

None necessary.

Conclusion

No tribal cultural resources are known or expected to occur within or adjacent to the project site. Therefore, potential impacts to tribal cultural resources would be less than significant, and no mitigation measures are necessary.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

19. UTILITIES AND SERVICE SYSTEMS

Would the project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	1, 40, 54	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	40	☐	☐	☒	☐
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?	1, 54, 56	☐	☐	☒	☐
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?	1, 55	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	1, 55	☐	☐	☒	☐

Evaluation

The City's Utilities Department is the sole water provider within the city, provides potable and recycled water to the community, and is responsible for water supply, treatment, distribution, and resource planning. The City's Water Resource Recovery Facility (WRRF) treats all of the wastewater from the city, Cal Poly, and the County airport. The facility treats 4.5 million gallons of wastewater per day. The WRRF manages and treats wastewater in accordance with standards established by the SWRCB to remove solids, reduce the amount of nutrients, and eliminate bacteria in treated wastewater. A portion of the treated water is recycled for irrigation use within the City and the remaining flow is discharged to San Luis Obispo Creek.

The 1993 FHMP MND concluded that future buildout of proposed hospital facilities may warrant improvements to the capacity of wastewater service lines along Johnson, Ella, and/or Fairview Streets to ensure adequate flow rates and identified mitigation to require plans and calculations to be prepared to demonstrate how buildings will connect to City wastewater sewer lines to be approved by the City Public Works and Utilities Directors. No other potential impacts associated with utilities were identified.

a) The project would include the installation of new water, wastewater, stormwater, and natural gas infrastructure and connections to City infrastructure, including a new water meter and sewer lateral. These components have been evaluated for their potential to result in adverse environmental effects throughout this document. Mitigation Measures AQ-1 through AQ-4, CR-1 through CR-3, and N-1 would reduce potentially significant environmental impacts resulting from installation and establishment of new utility connections associated with air quality, cultural resources, and noise to less than significant. Following construction of these utility connections, no long-term environmental impacts are anticipated to occur. Therefore, potential environmental impacts associated with construction or extension of existing utilities would be *less than significant with mitigation.*

b) Per the City of San Luis Obispo General Plan Water and Wastewater Management Element, Policy A2.2.1, the City uses multiple water sources to meet its water supply needs. The City has four primary water supply sources, including Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water. Groundwater serves as a fifth supplemental source, which was suspended by the City from potable uses in April 2015.

During Water Year 2020, water demand totaled 4,730 acre-feet, below the 10-year average of 5,004 acre-feet (for 2011 to 2020), and the lowest total water demand since 2015. This is likely due to the impacts of the Coronavirus Disease 2019

(COVID-19) pandemic. The City utilized a total of 2,931 acre-feet from Salinas and Whale Rock reservoirs, meeting 62% of total City water demand. A total of 33% of the City's total water demand was met by Nacimiento Reservoir. In addition, the City delivered 237 acre-feet of recycled water for landscape irrigation and construction water, which equates to 5% of total City water demand. Total water supply available in 2020 was 10,107 acre-feet. In summary, the City maintains a robust water supply portfolio with greater than five years of water available. Therefore, potential impacts associated with having sufficient water supplies to serve the project and existing commitments during normal, dry, and multiple dry years would be *less than significant.*

c) The project would be served by the City's sewer system and would include the installation of a new sewer lateral to connect to existing City sewer infrastructure. The project would result in an incremental increase in wastewater demand on the WRRF. Impact fees are collected at the time building permits are issued to accommodate the project's contribution to the City's WRRF capacity. Therefore, impacts associated with the wastewater treatment provider's capacity to serve the project's wastewater needs would be *less than significant.*

d) Based on waste generation rates identified on the California Department of Resources Recycling and Recovery (CalRecycle) website, hospital land uses generate approximately 16 pounds of solid waste per bed per day. Other components of the proposed project, such as the parking deck and helistop, are not anticipated to generate substantial waste based on their accessory nature to the proposed hospital uses. The project would result in the generation of approximately 1,312 pounds of solid waste per day. The project has been designed to include solid waste receptacles and enclosures throughout the site and a compactor located parallel to the loading dock to be serviced by San Luis Garbage Company. Based on a letter by the operations manager, San Luis Garbage Company has reviewed the preliminary site plan for compatibility with their vehicles and have approved the plan. Project solid waste would be collected regularly and would eventually be disposed of at Cold Canyon Landfill. In addition, project demolition and other construction solid waste materials would likely be disposed of at the Cold Canyon Landfill. The Cold Canyon Landfill has approximately 13,100,000 cubic yards of remaining capacity as of February 2020 and is expected to reach capacity in 2040. Therefore, potential impacts would be *less than significant*.

e) AB 939 requires that a minimum of 50% of all solid waste be diverted from landfills by recycling, reusing, and other waste reduction strategies, consistent with the State's waste reduction goals. To help reduce the waste stream generated by this project, consistent with the COSE policies to coordinate waste reduction and recycling efforts (COSE 5.5.3), and the City's Development Standards for Solid Waste Services, recycling facilities have been incorporated into the project site design and a solid waste reduction plan for recycling discarded construction materials is a submittal requirement with the building permit application. Therefore, the project would be in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be *less than significant.*

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-4, CR-1 through CR-3, and N-1.

Conclusion

Proposed new connections to City water, wastewater, and natural gas infrastructure would result in impacts associated with air quality, cultural resources, and noise. With implementation of mitigation measures identified above, potential impacts associated with utilities and service systems would be less than significant with mitigation incorporated.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	1, 35	☐	☐	☒	☐

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	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?	1	☐	☐	☒	☐
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?	1	☐	☐	☒	☐
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?	1	☐	☐	☒	☐

Evaluation

Urban fire hazards result from the materials, size, and spacing of buildings, and from the materials, equipment, and activities they contain. Additional factors are access, available water volume and pressure, and response time for fire fighters. Based on the City Local Hazard Mitigation Plan, the risk of wildland fires is greatest near the City limits where development meets rural areas of combustible vegetation. Most of the community is within one mile of a designated High or Very High Fire Hazard Severity Zone (FHSZ), which indicates significant risk to wildland fire.

The City Safety Element identifies four policies to address the potential hazards associated with wildfire, including approving development only when adequate fire suppression services and facilities are available, classification of wildland FHSZ as prescribed by the California Department of Forestry and Fire Protection (CAL FIRE), prohibition of new subdivisions located within "Very High" wildland FHSZ, and continuation of enhancement of fire safety and construction codes for buildings.

a) Implementation of the project would not result in a significant temporary or permanent impact on any adopted emergency response plans or emergency evacuation plans. No breaks in utility service would occur as a result of project implementation. The project would not result in any temporary or long-term road closures. The project site is not identified as a Safe Refuge Area in the City of San Luis Obispo Fire Evacuation Plan, and all existing hospital facilities would remain in operation during project construction. Therefore, potential impacts would be *less than significant.*

b) The proposed project facilities would consist of infill development located almost entirely within existing paved parking areas. The project site topography is nearly level, and the project would not substantially alter the existing topography of the site. Construction and operation of the project would be required to be conducted in compliance with all applicable fire safety rules and regulations including the California Fire Code and PRC. Therefore, the project would not exacerbate wildfire risks and potential impacts would be *less than significant.*

c) The project would include the installation of new water, wastewater, stormwater, and natural gas connections to City infrastructure. These proposed infrastructure components would occur within an urbanized area and would be required to be constructed and installed in full compliance with applicable CBC and California Fire Code regulations. Proposed electricity and natural gas connections would be underground and would not exacerbate risk of fire. Therefore, potential impacts associated with exacerbation of fire risk or environmental impacts from installation of new infrastructure would be *less than significant.*

d) The project site is generally flat and is not located near slopes or other areas subject to downstream flooding or landslides. The project does not include any design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, potential impacts would be *less than significant*.

Issues, Discussion and Supporting Information Sources ER # 0742-2021	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Mitigation Measures

None necessary.

Conclusion

The project would not result in significant impacts associated with wildfire; therefore, no mitigation measures are necessary.

21. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	N/A	☐	☒	☐	☐
As discussed in each resource section above, the proposed project would have the potential to result in significant impacts to biological and cultural resources during the construction phase. Mitigation measures have been identified to require appropriate construction work timeframes, wildlife preconstruction surveys, no-work buffers, and cultural resource discovery protocol to reduce potential impacts to less than significant. Therefore, potential impacts would be *less than significant with mitigation incorporated.*					
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	N/A	☐	☒	☐	☐
Evaluation of cumulative impacts has been incorporated into each resource section above. Cumulatively considerable impacts have been identified associated with aesthetics, GHG emissions, and transportation impacts. Mitigation measures have been identified to reduce cumulatively considerable aesthetic, GHG emissions, and transportation impacts to less than cumulatively considerable including, but not limited to, painting of the alternative obstruction light poles to blend in with surrounding vegetation, if proposed, implementation of a TDM Plan, and incorporation of various mobile-source and stationary-source emission reduction measures. Therefore, potential impacts would be *less than cumulatively considerable with mitigation incorporated.*					
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	N/A	☐	☒	☐	☐
The project has the potential to result in significant impacts associated with aesthetics, air quality, cultural, energy, GHG emissions, hazards and hazardous materials, noise, transportation, and utilities/service systems that could result in substantial adverse effects on human beings. Mitigation measures have been identified to reduce these potential impacts to less than significant, including, but not limited to, standard idling restrictions, dust control measures, preparation of a geologic investigation for NOA, protocol for handling and disposing of ACM, provision of showers and bicycle lockers on-site, installation of mufflers on construction equipment, and fully enclosing the proposed generators. Therefore, potential impacts would be *less than significant with mitigation incorporated.*					

22. EARLIER ANALYSES

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:
a) **Earlier analysis used.** Identify earlier analyses and state where they are available for review.
City of San Luis Obispo Initial Study of Environmental Impact/Mitigated Negative Declaration for the French Hospital Medical Center Master Plan, 1993. This document is available for review at the City offices.
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.
Based on the scale and nature of proposed facilities that were not evaluated within the original 1993 FHMP MND and the changes that have occurred in the regulatory setting and environmental setting since the 1993 FHMP MND was prepared, very few effects identified in the document were considered adequate for the evaluation of the proposed project.
c) **Mitigation measures.** For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.
N/A

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59.	Email correspondence between City staff and French Hospital Expansion Project applicant team, February 2022
60.	CEQA GHG Emissions Analysis Compliance Checklist, Cunningham Group Architects, Inc., 2022

Attachments

1. Dignity Health French Hospital New Patient Tower Plan Set, March 2021
2. Visual Impact Assessment for the French Hospital Medical Center Expansion Project
3. Air Quality and Greenhouse Gas Impact Assessment for the Proposed French Hospital Medical Center Expansion Project
4. Biological Resources Assessment for the Dignity Health French Hospital Medical Center Master Plan Helistop Flightpath Obstruction Eucalyptus Tree Removal and Topping
5. Energy Impact Assessment for the Proposed French Hospital Medical Center Expansion Project
6. French Hospital Preliminary Stormwater Control Plan Hydrology Analysis
7. Noise Impact Assessment for the Proposed French Hospital Medical Center Expansion Project
8. Focused Multimodal Transportation Analysis – French Hospital Medical Center
9. French Hospital Medical Expansion VMT Assessment Technical Memorandum
10. County of San Luis Obispo Emergency Services Helicopter Use Records Correspondence
11. Email Correspondence Regarding French Hospital Medical Center Expansion Energy Savings
12. Updated San Luis Obispo Climate Action Plan for Community Recovery Consistency Analysis Technical Memorandum

REQUIRED MITIGATION AND MONITORING PROGRAMS

Aesthetics

AES-1 If obstruction light poles are proposed, prior to issuance of construction permits, the project applicant shall submit final design plans demonstrating the obstruction light poles would be colored a muted grey-green color in order to blend in with the foliage of the adjacent eucalyptus grove.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections.

Air Quality

AQ-1 The following SLOAPCD-recommended *Standard Mitigation Measures* shall be implemented to reduce construction generated NO_x, ROG, and DPM.

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel-powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. Diesel-fueled construction equipment shall meet, at a minimum, CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines and comply with the State Off-Road Regulation. Off-road equipment meeting CARB's Tier 3 and Tier 4 emission standards should be used, to the extent locally available;
4. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
5. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle when equipment is not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the idling restrictions;
7. Equipment staging and queuing areas shall be located at the maximum distance feasible from sensitive receptor locations. Signs shall be posted identifying these areas;
8. Electrify equipment when possible;
9. Substitute gasoline-powered in place of diesel-powered equipment, where possible;
10. Use alternative-fueled construction equipment on-site where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel; and
11. The contractor or builder shall designate a person or persons to monitor the implementation of the measures detailed above. Signage on-site shall be provided near project site entrances that detail the name and telephone number of the on-site monitor. The monitor shall be responsible for fielding questions and addressing concerns received from the public on an as-needed basis. Significant concerns shall be relayed to City Planning and Building staff.

AQ-2 The following SLOAPCD-recommended mitigation measures shall be implemented to reduce construction generated fugitive dust. These measures shall be shown on grading and building plans.

1. Reduce the amount of disturbed area where possible.

2. Use water trucks, SLOAPCD-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.
3. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.
4. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
5. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
6. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code Section 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a "track-out prevention device" where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track-out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.
7. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;
8. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
9. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
10. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.
11. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

AQ-3 The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (NO_x, ROG, and DPM) and area sources. These measures shall be shown on grading and building plans:

1. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the CARB) or be permitted by the SLOAPCD. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
2. Construction of the proposed project shall use low-VOC content paints not exceeding 50 grams per liter.
3. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
4. Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment:
    a. Staging and queuing areas shall be located at the greatest distance feasible from sensitive receptor locations;
    b. Diesel idling when equipment is not in use is not permitted;
    c. Use of alternative fueled equipment is recommended whenever possible; and,
    d. Signs that specify the no-idling requirements must be posted and enforced at the construction site.
5. Idling Restrictions for On-road Vehicles. Section 2485 of Title 13, the California Code of Regulations (CCR) limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
    a. Shall not idle the vehicle's primary diesel engine when vehicle is not in use, except as noted in Subsection (d) of the regulation; and,
    b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.
    c. Signs must be posted in the designated queuing areas and job sites to remind drivers of the no-idling requirement. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.
6. Idling Restrictions for off-Road Equipment. Off-road diesel equipment shall comply with the idling restriction identified in the Idling Restrictions for On-road Vehicles detailed above. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the no-idling requirement.

AQ-4 The following mitigation measures shall be implemented to reduce the disturbance of asbestos and lead. Strategies include but are not limited to the following:

1. Demolition of on-site structures shall comply with the National Emission Standards for Hazardous Air Emissions requirements (40 CFR 61, Subpart M, Asbestos NESHAP) for the demolition of existing structures. The SLOAPCD is delegated authority by the Environmental Protection Agency (EPA) to implement the Federal Asbestos NESHAP. Prior to demolition of on-site structures, the SLOAPCD shall be notified, per NESHAP requirements. The SLOAPCD notification form and reporting requirements are included in Appendix A of the Air Quality and Greenhouse Gas Impact Assessment for the Proposed French Hospital Medical Center Expansion Project (Attachment 3). Additional information may be obtained at website URL: https://www.slocleanair.org/rules-regulations/asbestos/complaints-resources.php.
2. If during the demolition of existing structures, paint is separated from the construction materials (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state and federal regulations.

According to the Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Contact the SLOAPCD Enforcement Division at (805) 781-5912 for more information. Approval of a lead work plan and permit may be required. Lead work plans, if required, shall be submitted to SLOAPCD ten days prior to the start of demolition.

3. Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos (NOA) is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the SLOAPCD. If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM. These requirements may include but are not limited to:
    a. Development of an Asbestos Dust Mitigation Plan which must be approved by the SLOAPCD before operations begin, and
    b. Development and approval of an Asbestos Health and Safety Program (required for some projects).

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary.

Biological Resources

BR-1 Site preparation, construction, and vegetation removal shall be scheduled to occur outside the nesting bird season (February 15–September 15), if feasible. If proposed site preparation, construction, and/or vegetation removal is scheduled to occur between February 15 and September 15, the project applicant shall retain a qualified biologist to conduct a nesting bird survey no more than 2 weeks prior to disturbance to determine presence/absence of nesting birds within the disturbance area. All findings of the nesting bird survey shall be provided in a monitoring report to the City prior to initiation of project site disturbance activities.

If active nests are observed, vegetation removal shall be avoided within 100 feet of active passerine nests and 300 feet of active raptor nests until young birds have fledged and left the nest. The nests shall be monitored weekly by a biologist with experience with nesting birds. The buffer may be reduced if deemed appropriate by the biologist and approved by City staff. If any federally or state-listed bird species or California fully protected bird species are observed nesting in or near the project site, the biologist and the City shall coordinate with the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) before any disturbances occur within 500 feet of the nest.

Readily visible exclusion zones shall be established in areas where nests must be avoided. Bird nests, eggs, or young covered by the MBTA and California Fish and Game Code shall not be moved or disturbed until the end of the nesting season or until young fledge, nor shall adult birds be killed, injured, or harassed at any time. Pursuant to California Fish and Game Code Section 3503.5, nests of raptors (owls, hawks, falcons, eagles) shall not be removed prior to coordination with and approval from the CDFW.

BR-2 If tree removal or site disturbance is necessary during the fall and winter monarch butterfly migration (October 15–February 28), a qualified biologist shall conduct a preconstruction survey for monarch butterflies that could utilize trees on-site for overwintering. If monarch butterflies are detected in the work area or within 300 feet of the work area, tree removal shall be postponed until after the overwintering period or until a qualified biologist determines monarch butterflies are no longer utilizing the trees on or within 300 feet of the site for overwintering.

BR-3 Protective silt fencing shall be installed prior to, and maintained in place until conclusion of, grading and development of the project site to prevent excess soil from sloughing off into sensitive natural habitats and the creek adjacent to proposed disturbance areas. Fencing shall be installed between proposed disturbance areas and natural vegetation located within the existing open space easement.

BR-4 For the life of the project, the project applicant shall retain a qualified biologist to conduct annual biological surveys of the open space easement area to document the condition of the creeks and riparian vegetation on-site, document the condition of existing culverts and other drainage improvements, and identify necessary drainage improvements, vegetation trimming or removal, or other maintenance activities for riparian corridor restoration, erosion control, fire protection, soil stabilization, and/or removal of creek flow obstructions. The annual reports shall be submitted to and reviewed by the City Natural Resources Manager and/or Community Development Department to confirm compliance with the terms and conditions of the open space easement. The project applicant shall coordinate with the City Natural Resources Manager and/or Community Development Department to implement and provide documentation of necessary restoration activities on an as-needed basis.

BR-5 Prior to any vegetation trimming or removal or other site disturbance activities within the riparian corridor areas on-site, the project applicant shall provide the City a copy of a Lake and Streambed Alteration Agreement for the proposed actions. At a minimum, the following avoidance and minimization measures described below shall be implemented:

1. Tree and vegetation removal from within the top of bank or furthest extent of riparian vegetation shall be prohibited during rain or within 24 hours following significant rainfall. Significant rainfall is defined as rainfall totaling one-half inch (0.5-inch) of rain in any 24-hour period.
2. All vegetation removal within the top-of-bank shall be conducted during daylight hours.
3. Prior to vegetation removal from within the top of bank or furthest extent of riparian vegetation, the contractor shall identify the limits of access routes and encroachment into the riparian area to the minimum disturbance required to conduct the vegetation removal. The "work area limits" shall be clearly marked in the field with highly visible flagging or fencing. The flagging or fencing shall be maintained in good repair for the duration of activities occurring in the top-of-bank. All areas beyond the identified work area limits shall be considered Environmentally Sensitive Areas (ESA) and shall not be disturbed.
4. The aquatic areas within the creeks shall be avoided. Project activities within the aquatic portions of the creeks are prohibited. No work within the channel of the creek shall occur.
5. Prior to construction, a qualified biologist shall conduct training sessions to familiarize all construction personal with the project conditions, limits of disturbance, special-status species with potential to occur in the work areas, general provisions and protections afforded by the state and federal endangered species acts, the Clean Water Act, Porter Cologne Water Quality Act, and California Fish and Game Code.
6. The disturbance or removal of vegetation shall not exceed the minimum necessary to complete the project and shall only occur with the defined work areas. The disturbed portions of the stream bank shall be restored to as near their original condition as possible.
7. Prior to initiation of project activities, all trees to be cut or removed shall be clearly identified and marked to avoid accidentally removing trees that should be avoided.
8. Staging and storage areas for equipment, materials, fuels, lubricant, and solvents shall be located at least 50-feet from the top-of-bank. All fueling and maintenance of vehicles or other equipment shall be prohibited outside of the designated staging and storage areas.
9. Upon completion of construction, all disturbed soils shall be stabilized using generally-accepted erosion and sediment control practices such as crimped straw and seeds, jute netting, or other appropriate measures. If any mats or netting are used, said mats or netting shall contain only natural fiber materials. Nylon or other synthetic materials shall not be used in mats or netting. All disturbed areas shall be revegetated with riparian or upland vegetation, as appropriate.
10. All project-generated debris, building materials, and rubbish shall be removed from the stream and from areas where such materials could be washed into the stream.

BR-6 Prior to site preparation and issuance of grading and building permits, the contractor shall prepare a Hazardous Materials Response Plan to allow for a prompt and effective response to any accidental spills and submit the plan to the City Community Development Department for approval. Workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-7 During construction, erosion control measures (e.g., silt fencing, fiber rolls, and barriers) shall remain available on-site and shall be utilized as necessary to prevent erosion and sedimentation in natural habitat areas or creeks. No synthetic plastic mesh products shall be used for erosion control and use of these materials on-site is prohibited. Erosion control measures shall be checked to ensure that they are intact and functioning effectively and maintained on a daily basis throughout the duration of construction.

BR-8 During construction, the cleaning and refueling of equipment and vehicles shall occur only within a designated staging area and at least 100 feet (30 meters) from the top of bank or furthest extent of riparian vegetation of creeks located within the project vicinity. At a minimum, equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

BR-9 During construction, trash shall be contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from the work areas.

BR-10 Prior to issuance of grading and building permits, the project applicant shall submit a final landscape planting plan to the City that shall demonstrate in-kind replacement plantings for every native tree proposed for removal at a 1:1 ratio for on-site plantings and 2:1 ratio for off-site plantings (if proposed). The landscape planting plan shall establish success criteria and include a monitoring and reporting schedule over a 5-year period to ensure the success of native tree plantings. In addition, all replacement plantings located within the open space easement area shall be native species.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City Community Development Department and Natural Resources Manager shall verify compliance.

Cultural Resources

CR-1 Prior to construction activities, a City-qualified archaeologist shall conduct cultural resource awareness training for all construction personnel including the following:

1. Review the types of archaeological artifacts that may be uncovered;
2. Provide examples of common archaeological artifacts to examine;
3. Review what makes an archaeological resource significant to archaeologists and local native Americans;
4. Describe procedures for notifying involved or interested parties in case of a new discovery;
5. Describe reporting requirements and responsibilities of construction personnel;
6. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.

CR-2 If cultural resources are encountered during subsurface earthwork activities, all ground-disturbing activities within a 50-foot radius of the find shall cease and the City shall be notified immediately. Work shall not continue until a City-qualified archaeologist assesses the find and determines the need for further study. If the find includes Native American affiliated materials, a local Native American tribal representative will be contacted to work in conjunction with the City-approved archaeologist to determine the need for further study. A standard inadvertent discovery clause shall be included in every grading and construction contract to inform contractors of this requirement. Any previously unidentified resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist.

If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan, in conjunction with locally affiliated Native American representative(s) as necessary, that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analysis, prepare a comprehensive report, and file it with

the CCIC, located at the Santa Barbara Museum of Natural History, and provide for the permanent curation of the recovered materials.

CR-3 In the event that human remains are exposed during earth disturbing activities associated with the project, an immediate halt work order shall be issued, and the Community Development Director and locally affiliated Native American representative(s) (as necessary) shall be notified. State Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. These requirements shall be printed on all building and grading plans.

Monitoring Program: These conditions shall be noted on all grading and construction plans and be clearly visible to contractors and City inspectors. The name and contact information for the City-qualified archaeologist shall be clearly indicated within construction plans. In the unlikely event of resource discovery, the Community Development Director shall be contacted immediately. City staff will periodically inspect the site for continued compliance with the above mitigation measures.

Energy

ENG-1 The project applicant shall submit a TDM Plan for review and approval by the City Public Works Department prior to issuance of building permits. The plan shall identify the TDM strategies to be implemented and methods for monitoring the effectiveness of the TDM strategies. The TDM program shall be reviewed and approved by City's Transportation Division prior to implementation. The TDM plan shall include strategies and/or payment of traffic mitigation fees sufficient to achieve the City's significance threshold of 15% below the existing County average vehicle miles traveled per service population (VMT/SP) of 17.43 VMT/SP. At a minimum, based on the VMT analysis prepared for this project and in addition to the measures currently implemented, the following strategies, or equivalent measures that achieve 17.43 VMT or less as approved by the City Public Works Transportation Division, shall be implemented (MBI 2021):

1. Provide parking cash-out programs for employees;
2. Provide employer-implemented ride-sharing program for employees; and,
3. Implement commute trip-reduction marketing strategies for employees.

ENG-2 Prior to issuance of construction permits, the following additional mitigation measures shall be shown on project plans and implemented to further reduce operational consumption of energy resources:

1. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.
2. Exceed Cal Green standards by 25% for providing on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only.
3. Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed Cal Green Tier 2.
4. Meet or exceed Cal Green Tier 2 standards for providing EV charging infrastructure.
5. Meet or exceed Cal Green Tier 1 standards for building energy efficiency.
6. Meet or exceed Cal Green Tier 2 standards for utilizing recycled content materials.
7. All built-in appliances shall be Energy Star certified or equivalent.
8. Meet or exceed City Water Efficient Landscape standards by 15%.
9. Low-flow water fixtures shall be installed.
10. Proposed landscaping shall include water-efficient landscapes and irrigation systems.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the City Building Division, as necessary.

Noise

N-1 The following measures shall be implemented to reduce short-term construction noise impacts:

1. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. Construction activities would be prohibited on Sundays and legal holidays.
2. Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations.
3. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.
4. Stationary noise sources such as generators or pumps shall be located at the furthest distance possible from noise sensitive uses.
5. No less than 1 week prior to the start of construction activities at a particular location, notification shall be provided to nearby noise-sensitive land uses (e.g., residences) that are located within 200 feet of the construction site.

N-2 Backup power generators shall be enclosed within a fully-enclosed sound-attenuated container in accordance with manufacturer recommendations.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections.

Transportation

TR-1 If project VMT per employee cannot be reduced to at or below the City's threshold of 17.43 VMT per service population, the applicant shall coordinate with City Public Works staff to provide funding for the implementation of transportation improvements or other measures that reduce local VMT, such as funding off-site pedestrian/bicycle/transit infrastructure, or increasing the service frequency to/from the hospital through either private shuttle service or working with SLO Transit to increase their service frequencies. Other types of improvements than reduce VMT may also be proposed, subject to the review and approval of the City Community Development and Public Works Departments.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development and Public Works Departments. Compliance shall be verified by the City during regular inspections.