COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

Initial Study – Environmental Checklist

PLN-1118
04/2020

Evenson Parcel Map SUB2021-00014 (CO20-00079) ED21-051

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

SWCA Environmental Consultants	Brandi Cummings		10/13/2022
Prepared by (Print)	Signature		Date
Eric Hughes, Principal Environmental Specialist	Eric Hughes Digitally signed by Eric Hughes DN: C=US, E=ehughes@co.slo.ca.us, O=Planning and Building, OU=San Luis Obispo County, CN=Eric Hughes Date: 2022.10.13 16:23:11-07'00'	For Xzandrea Fowler, Environmental Coordinator	
Reviewed by (Print)	Signature		Date

Initial Study – Environmental Checklist

Project Environmental Analysis

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

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

A. Project

DESCRIPTION: A request by Donna Evenson (Applicant) for a Tentative Parcel Map (SUB2021-00014/ CO 20-0079) to subdivide a 24-acre parcel into four parcels, ranging in size from 5.0 acres to 8.6 acres for the sale and/or development of each proposed parcel. Building envelopes are proposed, and an open space easement is proposed across the southern portion of all four parcels. The project also includes the construction of an access road (Oak Hill Court) to the north, connecting to Oak Hill Road, for access to the project site, resulting in 1,816 cubic yards (cy) of cut and 2,925 cy of fill (4,741 total cy of earthwork) and approximately 57,215 square feet (1.31 acres) of ground disturbance. The project includes a request for an adjustment to Title 21 (Real Property Division Ordinance) to allow more than five parcels to take access off a private easement (Oak Hill Court and Oak Hill Road). The project site is located in the Residential Suburban land use category, on the east side of Corbett Canyon Road, approximately 600 feet south of Oak Hill Road, northeast of the city of Arroyo Grande. The project is located within the San Luis Bay (Inland) Sub Area (South) of the South County (Inland) Planning Area.

The applicant is proposing to subdivide the 24-acre parcel into four individual residential lots located across the entire project site. Development of individual residences within building envelopes are not proposed at this time and would be constructed later by individual homeowners or by a developer. A new 50-foot access road and public utility easement from Oak Hill Road would be developed according to County of San Luis Obispo Public Works Department (County Public Works) and California Department of Forestry and Fire Protection (CAL FIRE) standards as part of the proposed subdivision. The road would be 20 feet wide with 2-foot shoulders terminating in a cul-de-sac and would be approximately 1,265 feet in length. Construction of the road would require the removal of approximately 36 planted avocado and blue gum eucalyptus trees. Oak Hill Court and Oak Hill Road currently provide access to 16 parcels and implementation of the project would result in an additional four parcels. The project includes a request for an adjustment to Title 21 (Real Property Division Ordinance) to allow more than five parcels to take access off a private easement (Oak Hill Court and Oak Hill Road). The project includes an open space easement across the four proposed lots to protect oak trees and the seasonal wetland habitat on-site. Primary access to the individual lots would be from a proposed access road (Oak Hill Court), which connects to Oak Hill Road. Corbett Canyon Road runs along the western edge of the project site.

Site Improvements

The project would require private utility connections to serve the lots. New connections would be placed within the 50-foot-wide access and utility easement within the proposed road. The project would require private water connections that would connect to individual wells, which were drilled in 2017. At full build-out, the project would result in approximately 2.5 acre-feet of water demand per year. Sewage would be handled through proposed individual septic systems on each lot. Future development would include construction of individual residences on building pads/envelopes. Septic tanks, leach fields, and water storage tanks would also be installed on each lot, allowed outside of the building envelopes (if necessary) based on optimal siting for percolation and flow.

Background: This project originally began under project number SUB2018-00011 (CO 16-0211) as a request to subdivide the property into four parcels and to adjust the lot lines between two adjacent lots under the same ownership. Due to the number (six) of involved parcels, it was determined that the project did not qualify for a parcel map, and in 2019 was converted to a request for a Vesting Tentative Tract Map (SUB2019-00076/VTTM 3137). After additional project redesign and coordination with County staff, the applicant proceeded with a Lot Line Adjustment for the two adjacent lots under same ownership (SUB2021-00015), which allowed the tract map to be converted back into a parcel map (SUB2021-00014/ CO 20-0079).

ASSESSOR PARCEL NUMBER(S): 044-332-022

Latitude: 35º 09' 01.68" N **Longitude:** 120º 33' 30.27" W **SUPERVISORIAL DISTRICT #** 3

B. Existing Setting

Plan Area: South County **Sub:** San Luis Bay (South) **Comm:**

Land Use Category: Residential Suburban

Combining Designation: Flood Hazard

Parcel Size: 24 acres

Topography: Nearly level to steeply sloping

Vegetation: Agriculture, Ruderal, Oak woodland, Riparian , Eucalyptus trees, Grasses, avocado orchards

Existing Uses: Undeveloped, vacant

Surrounding Land Use Categories and Uses:

North: Agriculture; Residential Suburban residential avocado orchard

East: Residential Suburban; residential undeveloped

South: Residential Suburban; residential

West: Residential Suburban; residential Corbett Canyon Road

Baseline Conditions

The project parcel is located approximately 540 feet south of Oak Hill Road and the western portion of the parcel is adjacent to Corbett Canyon Road. The project site consists of a single legal parcel, approximately 24 acres in size, which is currently undeveloped and has historically been vacant. The proposed access road would traverse a parcel (Assessor's Parcel Number [APN] 044-332-035) directly north of the subject property. Topography of the project site varies from nearly level in some areas to steeply sloping in others,

with an average slope of 14%, and consists of annual grasslands, eucalyptus trees, coast live oak woodland, riparian, avocado orchards, ruderal/disturbed land, and agricultural land. The project site has a land use designation of Residential Suburban and is subject to the regulations of Title 22 of the County Code.

The project is bordered to the north and south by smaller Residential Suburban parcels, 2 to 7 acres in size, with low-density residential development; to the west by Corbett Canyon Road; and to the east by Residential Suburban parcels, approximately 3 to 4 acres in size, with low-density residential development and one large vacant parcel approximately 37 acres in size. There is a current application for the approximately 37-acre parcel to subdivide the property into seven individual lots (SUB2019-00093/TR3074).

Future development would be accessed by a proposed new access road (Oak Hill Court) extending to the north across a neighboring parcel to Oak Hill Road, which currently provides access to 16 parcels.

Initial Study – Environmental Checklist

Figure 1. Project Vicinity Map

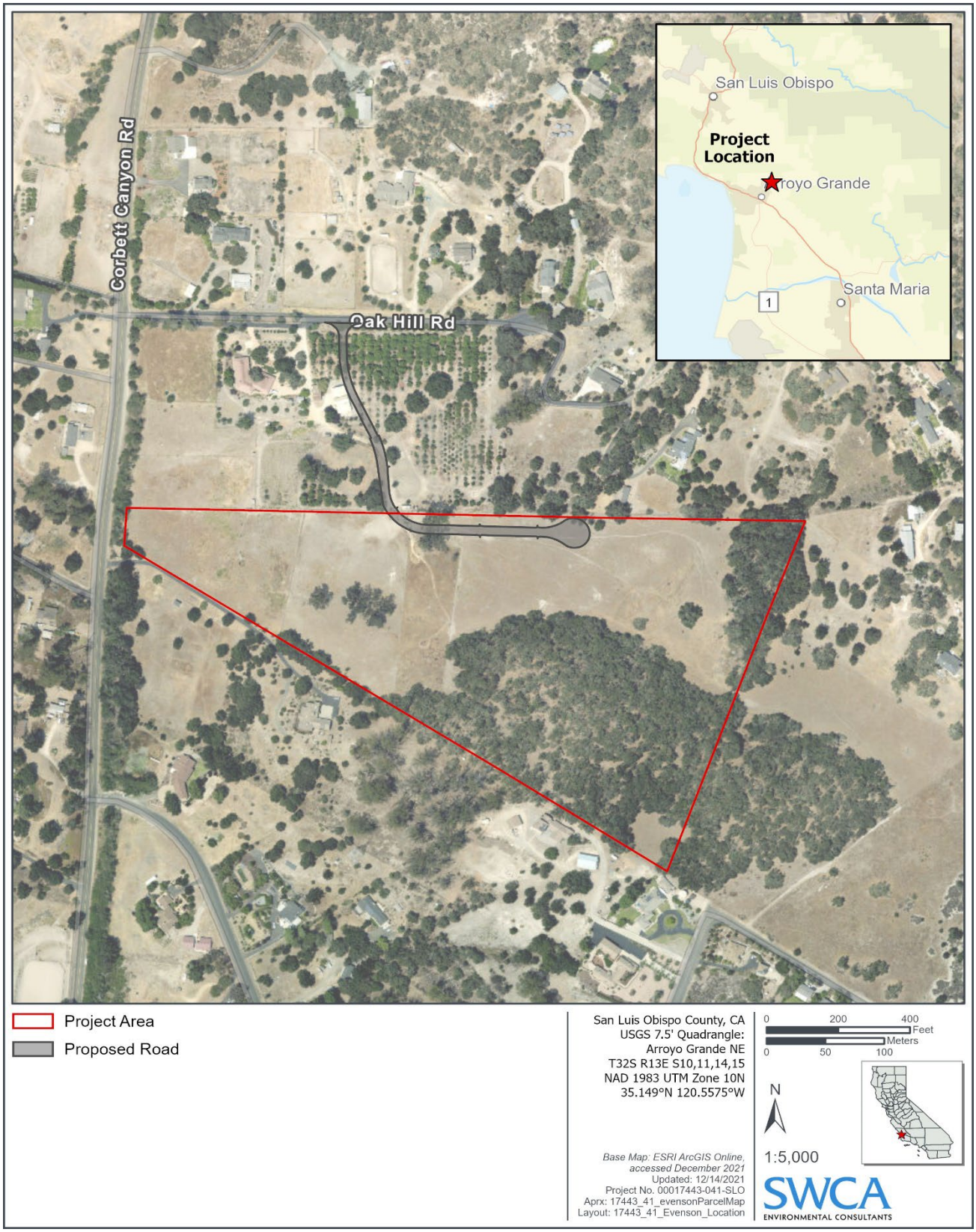
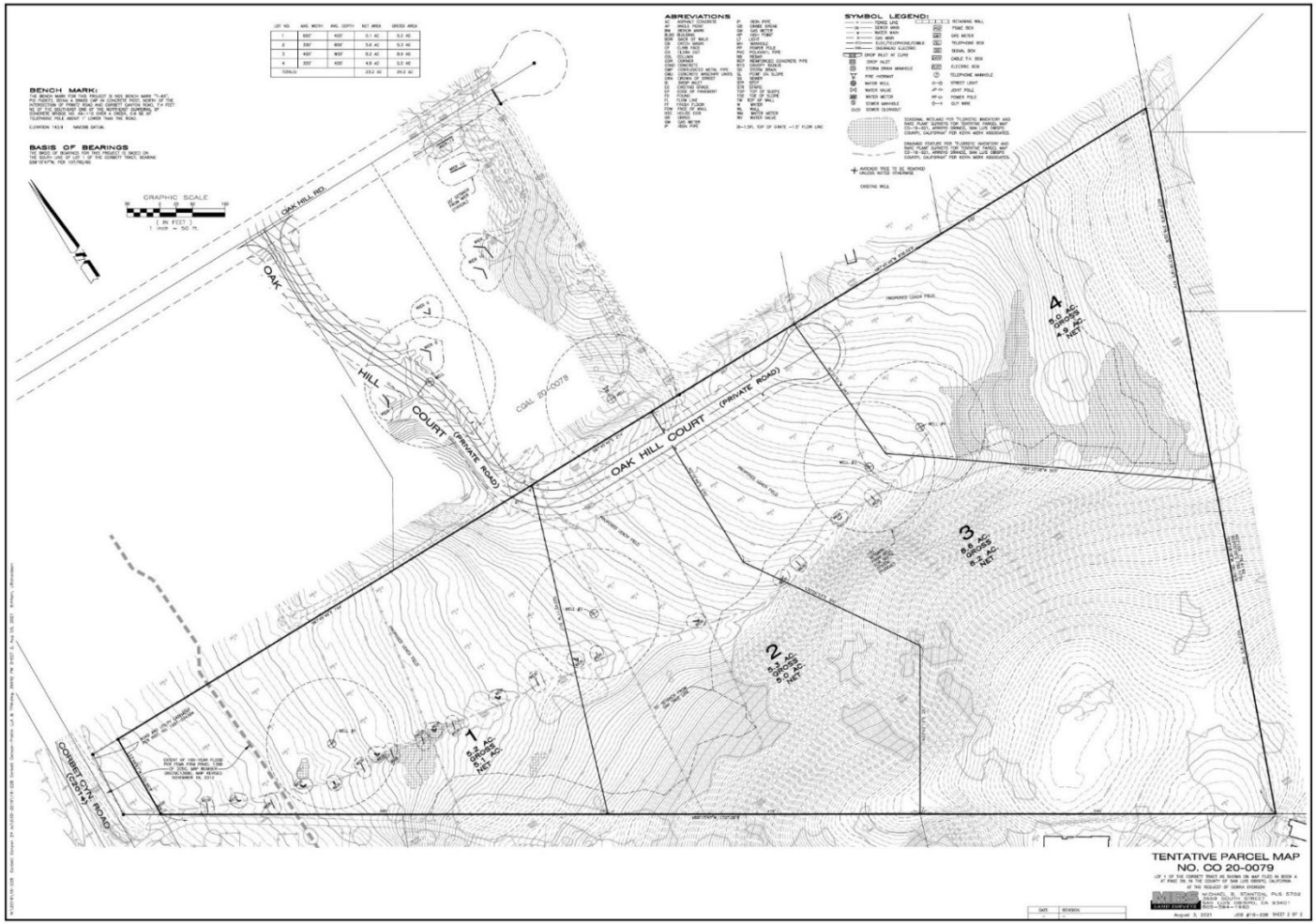


Figure 2. Site Plan Map



SWCA
ENVIRONMENTAL CONSULTANTS

C. Environmental Analysis

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

I. AESTHETICS

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

Setting

California Scenic Highway Program

The California Scenic Highway Program was created by the State Legislature in 1963 with the intention of protecting and enhancing the natural scenic beauty of California highways and adjacent corridors. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Scenic Highways within San Luis Obispo County include U.S. Route 101 (US 101), State Route (SR) 46, portions of SR 41, SR 1, and Lake Nacimiento Drive. The project site is located approximately 2.3 miles east of US 101.

County of San Luis Obispo General Plan Conservation and Open Space Element

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

- **Goal VR 1:** The natural and agricultural landscape will continue to be the dominant view in rural parts of the county.
- **Goal VR 2:** The natural and historic character and identity of rural areas will be preserved.
- **Goal VR 3:** The visual identities of communities will be preserved by maintaining rural separation between them.
- **Goal VR 7:** Views of the night sky and its constellation of stars will be maintained.

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

County of San Luis Obispo Land Use Ordinance

The *County of San Luis Obispo Land Use Ordinance* (County LUO) defines a Sensitive Resource Area (SRA) combining designation that applies to areas having high environmental quality and special ecological or educational significance. These designated areas are considered visual resources by the County, and the County LUO establishes specific standards for projects located within these areas. These standards include, but are not limited to, setback distances from public viewpoints, prohibition of development that silhouettes against the sky, grading slope limitations, set back distances from significant rock outcrops, design standards including height limitations and color palette, and landscaping plan requirements. The subject property is not located within an SRA designated by the County.

The subject property supports nearly level to steeply sloping topography and is visible from Corbett Canyon Road, an arterial road, and Oak Hill Road, a private road. Existing vegetation consists of grasses, oak woodland, eucalyptus, and avocado orchards. The site is currently undeveloped and surrounding development includes scattered residences.

Discussion

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

A scenic vista is generally defined as a high-quality view displaying good aesthetic and compositional values that can be seen from public viewpoints. Vistas are inherently expansive views, usually from an open area or elevated point. Some scenic vistas are officially or informally designated by public agencies or other organizations. A substantial adverse effect on a scenic vista would occur if the project would significantly degrade the scenic landscape as viewed from public roads or other public areas. A proposed project's potential effect on a scenic vista is largely dependent on the degree to which it would complement or contrast with the natural setting, the degree to which it would be noticeable in the existing environment, and whether it detracts from or complements the scenic vista. The project is not located in the view of a designated or undesignated scenic vista. Therefore, there would be *no impact*.

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

The project site is accessed from Oak Hill Road by a new proposed access road (Oak Hill Court), which is located to the north of the project site. Oak Hill Road connects to Corbett Canyon Road. The nearest state highway is US 101, which is an eligible state scenic highway, located approximately 2.3 miles west of the project site. Due to distance and intervening development and topography, the subject property is not located within the viewshed of a designated or eligible state scenic highway; therefore, *no impacts* would occur.

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

The 24-acre parcel is located in a rural area approximately 1 mile northeast of the city of Arroyo Grande on the east side of Corbett Canyon Road. The parcel is comprised of relatively flat topography throughout the northern and central portions of the parcel to steeply sloping topography in the southern portion of the property. The proposed project includes subdividing the existing parcel into four lots for future residential development. Construction of the project may result in construction-related views from Corbett Canyon Road and surrounding land uses. Any views of construction activities would be temporary in nature and would not result in long-term adverse views from Lopez Drive or other surrounding land uses; therefore, impacts related to adverse construction-related views would be *less than significant*.

The project would result in the construction of a new paved 50-foot access road and public utility easement from Oak Hill Road and the future development of four residential parcels. The project would result in the removal of planted avocado trees and eucalyptus trees for construction of the proposed access road and utility easement. However, the project would maintain existing trees where feasible and would replant removed trees within the proposed open space easement to avoid degrading existing views through tree removal. Future residential development would be consistent with surrounding development and the subdivision would result in parcels consistent with surrounding densities. Therefore, impacts would be *less than significant*.

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

The subject parcel is currently undeveloped and does not support any uses that require the use of lighting on-site. The subject property is surrounded by low-density rural residential development. Because the parcel is undeveloped, future buildout of residential units would result in an increase of nighttime lighting in the area, but which would be consistent with the lighting from surrounding uses. Installation of exterior lighting on-site would be required to comply with the County LUO (Section 22.10.060) to avoid creating a substantial new source of light or glare. Therefore, impacts would be *less than significant*.

Conclusion

The proposed project would result in the development of a new private access road and public utility easement and future residential development. The proposed project would be consistent with surrounding development, and impacts related to visual resources would be less than significant.

Mitigation

No mitigation is necessary.

II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting

Based on the California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program (FMMP) (CDOC 2016), the entire project site contains Vacant or Disturbed Land, Grazing Land, and Farmland of Local Potential. The property is located in the Arroyo Grande Valley and Edna Valley Agricultural Preserve Areas, and the property is not subject to a Williamson Act contract.

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), the soil type and characteristics of the project area include (NRCS 2021):

- Arnold loamy sand, 15 to 50 percent slopes; Major Land Resource Area (MLRA) 15: This moderately to steeply sloping soil is considered well drained and has a very high runoff class. The soil has high to very high erodibility and low shrink-swell capability. This soil is not considered Prime Farmland and is considered Class VII without irrigation.
- Corralitos sand, 2 to 15 percent slopes: This gently to moderately sloping, sandy bottom soil is considered well drained. The soil has low erodibility, low shrink-swell characteristics, and potential septic system constraints due to poor filtering capabilities. This soil is considered Farmland of Statewide Importance. The soil is considered Class VI without irrigation and Class IV when irrigated.
- Gaviota fine sandy loam, 15 to 50 percent slopes: This moderately to steeply sloping, shallow coarse loamy soil is considered very poorly drained. The soil has high erodibility, low shrink-swell characteristics, and potential septic system constraints due to steep slopes and shallow depth to bedrock. This soil is not considered Prime Farmland and is considered Class VII without irrigation and class is not rated when irrigated.

Forestland is defined in Public Resources Code (PRC) Section 12220(g) 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 in PRC Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forestland, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

Discussion

(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?

The proposed project area is not underlain by soils classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the FMMP. The project area is primarily classified as Vacant or Disturbed Land, with small areas of Farmland of Local Potential and Grazing Land (CDOC 2016). The project would not result in disturbance to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the FMMP; therefore*, no impacts* would occur.

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

The project property is located within the Arroyo Grande Valley and Edna Valley Agricultural Preserve Areas; however, it is not designated for agricultural uses and is not subject to a Williamson Act contract. The proposed access road and public utility easement would be constructed on a parcel (APN 044-332-035) that supports avocado orchards, and construction of the road would result in the permanent removal of some avocado trees; however, loss of avocado trees would not occur on land that is zoned for agriculture or under a Williamson Act contract. Implementation of the project would not result in disturbance to land subject to a Williamson Act contract or zoned for agricultural uses; therefore*, no impacts* would occur.

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

The subject property is not currently zoned for forestland, timberland, or Timberland Production and is not used for timber practices; therefore, implementation of the project would not result in disturbance to forest or timber uses, and *no impacts* would occur.

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

The subject property supports oak woodlands, eucalyptus, and other trees but would not be considered forestland per PRC Section 12220(g). The project does not include the removal of any oaks; therefore, *no impact* to forestland would occur.

(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?*

There is designated Agriculture land located approximately 0.6 mile east of the project site, across Lopez Drive and Arroyo Grande Creek; however, the project would not result in impacts to designated farmland within the vicinity of the project. In addition, surrounding land uses are not zoned for forest or timber use; therefore, the project would not result in the conversion of farmland to non-agricultural uses or forestland to non-forest use, and *no impacts* would occur.

Conclusion

The project site does not contain Important Farmland, forestland or timberland, or land currently designated for agricultural uses, and is not subject to a Williamson Act contract, and therefore would not result in impacts to these resource areas. The project does not propose the removal of any oaks. If future oak removal is necessary, the project would be required to comply with the County's oak woodland ordinance to avoid or mitigate for the loss of oaks.

Mitigation

No mitigation is necessary.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

San Luis Obispo County Clean Air Plan

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

SLOAPCD Criteria Pollutant Thresholds

The SLOAPCD has developed and updated their *CEQA Air Quality Handbook* (SLOAPCD 2012; most recently updated with a November 2017 Clarification Memorandum [SLOAPCD 2017]) to help local agencies evaluate project-specific impacts and determine if air quality mitigation measures are needed, or if potentially significant impacts could result. This handbook includes established thresholds for both short-term construction emissions and long-term operational emissions.

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

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial, and industrial development. Certain types of projects can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (referred to as stationary source emissions). General screening criteria are used by the SLOAPCD to determine the type and scope of air quality assessment required for a particular project (Table 1-1 in the *CEQA Air Quality Handbook*). These criteria are based on project size in an urban setting and are designed to identify those projects with the potential to exceed the SLOAPCD's significance thresholds. A more refined analysis of air quality impacts specific to a given project is necessary for projects that exceed the screening criteria below or are within 10% of exceeding the screening criteria.

The SLOAPCD has also estimated the number of vehicular round trips on an unpaved roadway necessary to exceed the 25 pounds per day (lbs/day) threshold of significance for the emission of particulate matter (PM_{10}). According to the SLOAPCD estimates, an unpaved roadway 1 mile in length carrying six round trips would likely exceed the 25 lbs/day PM_{10} threshold.

Sensitive Receptors

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others due to the population that occupies the uses and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. The nearest sensitive receptor locations to the project site are the residential units adjacent to the project site in all directions.

Naturally Occurring Asbestos

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by the California Air Resources Board (CARB). Serpentine and other ultramafic rocks are fairly common throughout San Luis Obispo County and may contain NOA. If these areas are disturbed during construction, NOA-containing particles can be released into the air and have an adverse impact on local air quality and human health. The project site is not located in an area identified as containing NOA by the SLOAPCD (SLOAPCD 2021).

Developmental Burning

As of February 25, 2000, the SLOAPCD prohibits developmental burning of vegetative material within San Luis Obispo County. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: SLOAPCD approval, payment of fee to the SLOAPCD based on the size of the project, and issuance of a burn permit by the SLOAPCD and the local fire department authority. As a part of SLOAPCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) at the time of application.

Discussion

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

In order to be considered consistent with the 2001 CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the 2001 CAP (SLOAPCD 2012). Adopted land use planning strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The proposed project does not include development of retail or commercial uses that would be open to the public; therefore, land use planning strategies such as mixed-use development and planning compact communities are generally not applicable.

The project would facilitate the future construction of four residential units and accessory structures, which is not a significant increase that would significantly affect the local area's jobs/housing balance. Implementation of the proposed project would be consistent with the air quality goals and/or objectives of the 2001 CAP; therefore, impacts related to consistency with applicable air quality plans would be *less than significant*.

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

Construction of site improvements for the subdivision would result in the generation of criteria air pollutants, including ozone precursors (ROG and NO_x) and fugitive dust. Additionally, future construction of four single-family residential units and accessory structures would result in additional emissions of pollutants during construction activity. The county is currently designated as non-attainment for ozone and PM_{10} under state ambient air quality standards (CARB 2021). Fugitive dust emissions would result from grading operations, and combustion emissions, such as NO_x and ROG, would result from the use of large diesel-fueled equipment including scrapers, loaders, bulldozers, haul trucks, compressors, and generators.

The project would result in approximately 57,215 square feet (1.31 acres) of site disturbance, including a total of 4,741 cy of cut/fill, for construction of the proposed access road and utility easement. Table 1 shows the estimated construction emissions for implementation of the proposed road. The *CEQA Air Quality Handbook* clarifies that any project that would require grading of 4 acres or more can exceed the 2.5-ton PM_{10} quarterly threshold listed above.

Table 1. Proposed Project Estimated Construction Emissions

Pollutant	Total Estimated Project Emissions[1]	APCD Emissions Threshold	Mitigation Required?
Reactive Organic Gases (ROG) + Nitrogen Oxide (NO_x) (combined)	539.5 lbs/day	137 lbs/day	Yes
Diesel Particulate Matter (DPM)	23.2 lbs/day	7 lbs/day	Yes

[1] Total estimated emissions identifies the total amount of emissions for the entire project (implementation of the proposed access road). Work would be completed over a course of months and would likely not exceed daily SLOAPCD thresholds.

Based on Table 1, Mitigation Measures AQ-1 and AQ-2 have been identified to require pollutant emission reduction methods during construction activities and include a suite of vehicle and construction equipment control measures designed to reduce pollutant concentrations. It is anticipated that the subdivision improvements and construction of single-family residential uses would occur sequentially. Exact grading volumes for the residential development are unknown at this time but would likely involve less than 4 acres of site disturbance and 1,200 cy of earthwork per day, which would not likely result in exceedances of the SLOAPCD thresholds. To minimize potential impacts, Mitigation Measures AQ-1 and AQ-2 would be applicable to the residential development. Therefore, potential construction-related impacts would be *less than significant with mitigation.*

Implementation of the project would result in the operation of four new single-family residential homes and accessory structures. The project does not propose any components that would result in a substantial amount of pollutant emissions that would exceed existing SLOAPCD thresholds; therefore, operational impacts would be *less than significant*.

(c) Expose sensitive receptors to substantial pollutant concentrations?

The nearest sensitive receptor locations are approximately 100 feet to the south and 280 feet to the north of the project parcel. In addition, there are other off-site scattered residential units located in

all directions of the project site. Tract improvement construction activity has the potential to result in pollutant concentrations that could disturb nearby sensitive receptor locations. Implementation of Mitigation Measures AQ-1 and AQ-2 are included to implement equipment and construction regulations to reduce potential emissions near sensitive receptor locations; therefore, impacts would be *less than significant with mitigation*.

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

According to the SLOAPCD NOA Map, the project site is not located in an area with known NOA (SLOAPCD 2021). Future development does not require demolition that could inadvertently release asbestos-containing material (ACM), lead-based paint, or other hazardous materials and contaminants. The project is not anticipated to result in adverse emissions or odors; therefore, impacts would be *less than significant*.

Conclusion

Implementation of the proposed project would result in short-term construction emissions. The project site is not located in an area that has known NOA and would not result in the demolition of buildings that could inadvertently release ACM. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce impacts of construction emissions near sensitive receptor locations. Therefore, with implementation of Mitigation Measures AQ-1 and AQ-2, impacts would be less than significant.

Mitigation

AQ-1 **Construction Equipment Reduction Techniques.** During all construction activities and use of diesel vehicles, the applicant shall implement the following idling control techniques:

a. Maintain all construction equipment in proper tune according to manufacturer's specifications;
b. Fuel all off-road and portable diesel-powered equipment with CARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
c. Use diesel construction equipment meeting the CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
d. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
e. Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
f. All on- and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit;
g. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
h. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
i. Electrify equipment when feasible;

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

k. Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel

California Diesel Idling Regulations. On-road diesel vehicles shall comply with California Code of Regulations (CCR) Title 13, Section 2485. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more 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 for greater than 5 minutes at any location, 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 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

Signs must be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following website: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

AQ-2 **Fugitive Dust Control Measures.** During all construction and ground-disturbing activities, the applicant shall implement the following particulate matter control measures and detail each measure on the project grading and building plans:

a. The amount of disturbed area shall be reduced where possible.

b. Water trucks or sprinkler systems shall be used 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 shall be required whenever wind speeds exceed 15 miles per hour (mph). Reclaimed (non-potable) water shall be used whenever possible.

c. All dirt stockpile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.

d. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible, following completion of any soil-disturbing activities.

e. Exposed grounds that are planned to be reworked at dates greater than 1 month after initial grading shall be sown with a fast-germinating, non-invasive, grass seed and watered until vegetation is established.

f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.

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

h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114.

j. "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 CVC Section 23113 and California Water Code (CWC) Section 13304. To prevent track out, access points shall be designated, and all employees, subcontractors, and others shall be required to use them. A "track-out prevention device" shall be installed and operated 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.

k. Streets shall be swept at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.

l. All PM_{10} Mitigation Measures required shall be shown on grading and building plans.

The contractor or builder shall designate a person or persons whose responsibility is to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to minimize dust complaints and reduce visible emissions below the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Their duties shall include holidays and weekend periods when work may not be in progress (for example, wind-blown dust could be generated on an open dirt lot). 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.

IV. BIOLOGICAL RESOURCES

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

Setting

Federal and State Endangered Species Acts

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

Migratory Bird Treaty Act

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

County of San Luis Obispo Oak Woodland Ordinance

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

The following information regarding setting and discussion of impacts to biological resources is primarily based on the *Floristic Inventory and Rare Plant Surveys for Tentative Parcel Map CO-16-0211, Arroyo Grande, San Luis Obispo County, California* (Kevin Merk Associates, LLC [KMA] 2017) and *Rare Plant Survey Update for COAL 20-0078 and CO-20-0079, Arroyo Grande, San Luis Obispo County, California* (KMA 2021). Appropriately timed botanical surveys were conducted for the project on April 21 and June 1, 2017, and April 14, 2021.

Existing Conditions

The subject property is currently undeveloped, and the topography of the site ranges from relatively flat to steeply sloping toward the southern portion of the parcel. Habitat types on the project site include agriculture, annual grassland, eucalyptus, oak woodland, ruderal/disturbed, and riparian and seasonal wetland. Coast live oak woodlands are located in the southern and eastern portions of the site, and several patches of blue gum eucalyptus (*Eucalyptus globulus*) throughout the site. There is an unnamed drainage that flows in an east-to-west direction through the project site and connects to a roadside ditch along Corbett Canyon Road. In addition, there are two special-status plant communities within the project site,

including seasonal wetland habitat along the unnamed drainage and arroyo willow riparian scrub habitat within the roadside ditch along Corbett Canyon Road (KMA 2017).

Critical Habitat

The project site is not located within or adjacent to designated critical habitat. Arroyo Grande Creek, located approximately 0.8 mile east of the project site, provides USFWS designated steelhead habitat. However, drainages at the project site are seasonal in nature and do not provide direct connectivity to Arroyo Grande Creek.

Special-Status Plant Species

The 2017 Floristic Inventory and Rare Plant Surveys and 2021 Rare Plant Survey Update identified the potential for 10 special-status plants to occur on-site (KMA 2017, 2021). These species have to potential to occur based on the presence of suitable habitat and soil conditions within the project site:

- **Hoover's bent grass (*Agrostis hooveri*)** is a California Rare Plant Rank (CRPR) 1B.2 species that has potential to occur within the oak and scrub habitat on-site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Santa Margarita manzanita (*Arctostaphylos pilosula*)** is a CRPR 1B.2 species that has potential to occur within the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Obispo Indian paintbrush (*Castilleja densiflora* ssp. *obispoensis*)** is a CRPR 1B.2 species that has potential to occur in the annual grassland or seasonal wetland habitats found within the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Straight-awned spineflower (*Chorizanthe rectispina*)** is a CRPR 1B.3 species that has the potential to occur within the annual grassland habitat within the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Pismo clarkia (*Clarkia speciosa* ssp. *immaculata*)** is a federally endangered and CRPR 1B.1 species that has potential to occur within the project site. The nearest California Natural Diversity Database (CNDDB) occurrence was recorded within 1 mile of the project site. The June 1, 2017, field survey took place to confirm the presence or absence of this species during the appropriate blooming period; however, this species was not observed on-site during the 2017 or 2021 field surveys. This species has been identified on adjacent properties.
- **Dune larkspur (*Delphinium parryi* ssp. *blochmaniae*)** is a CRPR 1B.2 species that has the potential to occur within sandy soils within the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Kellogg's horkelia (*Horkelia cuneata* ssp. *puberula*)** is a CRPR 1B.1 species that has the potential to occur within sandy soils on the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **San Luis Obispo Lupine (*Lupinus ludovicianus*)** is a CRPR 1B.2 species that has the potential to occur within sandy soils on the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.
- **Black flowered figwort (*Scrophularia atrata*)** is a CRPR 1B.2 species that has the potential to occur within the riparian habitat on the project site; however, this species was not observed on-site during the 2017 or 2021 field surveys.

Special-Status Wildlife Species

Protocol wildlife surveys were not conducted for the proposed project; therefore, the following information regarding potential impacts to special-status wildlife species is primarily based on the *Biological Report for Greenview Estates SUB2019-00093/TR3073 APN 047-181-001* (Althouse and Meade, Inc. [A&M] 2021) that was prepared for the adjacent parcel to the east (Greenview Estates). Both project sites are undeveloped, support similar soil types (sandy loam, sand, loamy sand), and have similar habitat types, including annual grassland and oak woodlands. The proposed project parcel supports eucalyptus trees, which is not a habitat type identified on the neighboring parcel. The Greenview Estates Biological Report prepared for the neighboring parcel is applicable to this project based on the mobility of wildlife species, proximity of the two sites, and similar conditions at the sites.

Desktop-level review conducted for the project site identified 53 special-status wildlife species that occur within the project region. Of the 53 identified species, nine special-status wildlife species were identified as having the potential to occur within the project area based on the presence of suitable habitat on-site (A&M 2021). Based on the biological report prepared for the project, there suitable habitat conditions exist on-site for the nine special-status wildlife species included in Table 2.

Table 2. Special-Status wildlife Species List

Common Name	Scientific Name	Listing Status	Habitat	Potential to Occur
Cooper's hawk	*Accipiter cooperii*	CDFW Watch List (for nesting occurrences only)	Suitable habitat for this species includes oak woodlands and riparian habitat for nesting and open fields for foraging.	**High.** There is suitable habitat for this species within the oak woodland habitat on-site. This species was observed foraging, and one adult individual was observed in a coast live oak tree during the 2014 field surveys of the Greenview Estates site.
northern California legless lizard	*Anniella pulchra*	CDFW SSC	Suitable habitat for this species includes sandy or loose soils under coastal scrub or oak trees for nesting.	**High.** Although this species was not observed during field surveys of the project site, there is suitable habitat in the sandy soils on-site; therefore, there is high potential for the species to occur on the project site.

Table 2. Special-Status wildlife Species List

Common Name	Scientific Name	Listing Status	Habitat	Potential to Occur
pallid bat	*Antrozous pallidus*	CDFW SSC	Suitable habitat for this species typically includes rock crevices, caves, tree hollows, mines, old buildings, and bridges.	**Low.** Although there may be roosting habitat for this species in trees on-site, the project site does not support typical roosting habitat, including rock crevices and caves. The nearest recorded CNDDB occurrence is over 11 miles away; therefore, this species is not anticipated to occur on the project site.
white-tailed kite	*Elanus leucurus*	CDFW Fully Protected species	This species nests in dense trees near open foraging areas.	**Moderate.** Although appropriate nesting and foraging habitat is present within the oak trees on-site, this species was not observed during field surveys and the nearest recorded occurrence is 14 miles northwest of the project site.
western red bat	*Lasiurus blossevillii*	CDFW SSC	This species primarily roosts in trees from sea level up through mixed conifer forests.	**Low.** Although suitable roosting habitat for this species is present in the trees on-site, the nearest recorded CNDDB occurrence is over 14 miles away; therefore, this species is not anticipated to occur on the project site.
coast horned lizard	*Phrynosoma blainvillii*	CDFW SSC	This species is present in a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	**Moderate.** There is suitable habitat for this species within the project site and the nearest recorded CNDDB occurrence is 1.8 miles east of the project site. Field surveys conducted were not conclusive for this species (A&M 2021).

Table 2. Special-Status wildlife Species List

Common Name	Scientific Name	Listing Status	Habitat	Potential to Occur
California red-legged frog	*Rana draytonii*	Federally listed; CDFW SSC	This species typically occurs in California in the Coast Range, the Sierras, the Transverse Range, and south below 1,200 meters elevation. The main habitat types for this species are deep, still or slow-moving sources of water in lowlands and foothills with shrubby, riparian, or vegetative shorelines for cover. Suitable vegetation cover includes cattails, arroyo willow, and bulrushes. Upland habitat is also necessary for food, shelter, and migration corridors for adults.	**Very Low.** The ephemeral drainage on-site is dry for most of the year and would not provide aquatic breeding habitat for this species. There is a potential perennial pond within the southeast corner of the project site that has potential to support some breeding habitat; however, there are no reported occurrences of this species at the pond. In addition, the ephemeral drainage would not provide upstream habitat for movement of individuals. Based on the lack of aquatic habitat provided by the ephemeral drainage, this species is not anticipated to occur.
yellow warbler	*Setophaga petechia*	CDFW SSC	This species typically nests in riparian vegetation, including cottonwoods, willows, etc.	**Low.** This species was observed during previous surveys of the project site conducted in 2014 and 2015; however, individuals were not identified during 2021 surveys. In addition, there are no riparian trees present on-site that would provide nesting habitat. Therefore, this species is not anticipated to nest on the project site.
American badger	*Taxidea taxus*	CDFWS SSC	This species typically occurs in grassland habitats throughout San Luis Obispo County. This species is highly mobile and hunts ground squirrels and other small- to medium-sized prey.	**Low.** Although there is grassland and sandy soil habitat present on-site, this species was not observed during field surveys. In addition, there were no badger dens or other evidence of this species on the project site.

Source: A&M (2021)

Discussion

(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?*

Implementation of the project has the potential to directly or indirectly disturb special-status plant and/or wildlife species that may be present within the project site during construction activities, as described below. Mitigation Measure BIO-1 requires a biological monitor for the project. Mitigation Measure BIO-2 requires project personnel to attend an environmental sensitivity awareness training prior to the commencement of project activities.

Special-Status Plants

Ground disturbance for implementation of the proposed access road and utility easement and future residential development would disturb special-status plant species if they occur on-site. However, there were no special-status plant species observed on-site during appropriately timed botanical surveys in 2017 or 2021 (KMA 2017, 2021). Therefore, ground disturbance and other project activities would not result in adverse impact to special-status plant species, and impacts would be *less than significant*.

Special-Status Wildlife

As described in Table 2, there is potential for nine special-status wildlife species to occur on-site based on the presence of suitable habitat for these species within the subject and neighboring property, as discussed below (A&M 2021).

Special-Status Reptile and Amphibian Species

There is potential for the presence of northern California legless lizard (*Anniella pulchra*) and coast horned lizard (*Phrynosoma blainvillii*) within the project area. Proposed ground disturbance for site improvements and future residential development has the potential to directly and/or indirectly disturb individuals of this species if present on-site. Mitigation Measure BIO-3 requires preconstruction surveys to determine if individuals are present within the project site and identifies the protocol in the event individuals are observed on-site.

As discussed in Table 2 above, California red-legged frog (*Rana draytonii*) is not expected to occur on-site because the project site does not support appropriate aquatic habitat to support movement of the species.

Special-Status Bat Species

Pallid bat (*Antrozous pallidus*) and western red bat (*Lasiurus blossevillii*) may roost within oak woodland or eucalyptus habitat on-site where potential habitat exists in natural cavities of large trees. Maternal bat colonies are protected by the CDFW but are not expected to occur on the project site; rather, potential roosting habitat on-site is likely to be temporary or seasonal by one or a few bats (A&M 2021). If individuals of these species were present on-site during proposed construction activities, they may be directly disturbed by tree removal and/or indirectly disturbed by construction-related noise and dust. Mitigation Measure BIO-4 requires roosting bat surveys prior to construction to avoid potential direct or indirect impacts as a result of development of the project site.

Special-Status Mammal Species

American badger (*Taxidea taxus*) is known from the Arroyo Grande area and could occur on the project site. The badger is a wide-ranging mammal that creates numerous dens in open grassland habitats within its territory. Mitigation Measure BIO-5 has been included to require a preconstruction survey to avoid or minimize potential disturbance to special-status mammals that may be present.

Special-Status Bird Species

Cooper's hawk (*Accipiter cooperii*) individuals were observed during field surveys of the neighboring parcel (A&M 2021). Construction activities associated with proposed site improvements and future residential development have the potential to directly disturb individuals that may be present within the project site due to habitat removal and may indirectly disturb individuals through construction-related noise and dust generation. In addition to Cooper's hawk, there is potential for other nesting or migratory bird species, including white-tailed kite (*Elanus leucurus*) and yellow warbler (*Setophaga petechia*), to be present within the project area. Mitigation Measure BIO-6 has been included to require nesting and migratory bird surveys prior to construction to avoid direct or indirect impacts to individuals that may be present at the time of construction. In addition, the project includes a revegetation plan that would avoid long-term impacts associated with habitat loss.

Therefore, with implementation of Mitigation Measures BIO-1 through BIO-6 potential impacts related to disturbance of special-status plants and wildlife would be *less than significant with mitigation*.

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

The project site supports sensitive natural communities, including arroyo willow riparian scrub and seasonal wetland habitat. The arroyo willow riparian scrub habitat is located on the eastern portion of the parcel and the seasonal wetland habitat is located within the central and western portions of the site. In addition, the project supports oak woodlands, which are protected by the County COSE. The project includes a permanent open space easement that would encompass the seasonal wetland habitat and oak woodland habitat on-site. In addition, the project would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) with best management practices (BMPs) and an Erosion and Sedimentation Control Plan (County LUO Section 22.52.120) in order to protect seasonal wetland habitat from potential polluted runoff. In addition, Mitigation Measure BIO-7 includes construction BMPs to reduce runoff during current and future construction activities. If future construction activity requires the removal of any oaks, the project would be required to comply with mitigation requirements in the Oak Woodland Ordinance. Based on the proposed open space easement and required compliance with the County LUO, the project would not result in adverse effects to sensitive natural communities on-site; therefore, impacts would be *less than significant with mitigation*.

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

The project includes a permanent open space easement that would encompass the seasonal wetland habitat on-site. In addition, the project would be required to prepare a SWPPP with BMPs and an Erosion and Sedimentation Control Plan (County LUO Section 22.52.120) in order to protect

seasonal wetland habitat from potential polluted runoff. In addition, Mitigation Measure BIO-7 includes construction BMPs to reduce runoff during current and future construction activities. Based on the proposed open space easement and required compliance with the County LUO, the project would not result in adverse effects to sensitive natural communities on-site; therefore, impacts would be *less than significant with mitigation*.

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

According to the CNDDB, the project site is not located within an identified wildlife corridor (CDFW 2021). There is an unnamed drainage that transects the project site in an east-to-west direction and connects to a drainage ditch located along Corbett Canyon Road. The on-site drainage and drainage ditch do not have the potential to support migratory fish based on the inconsistent level of water and lack of connectivity.

The project site supports oak woodlands, eucalyptus, and other trees that could support nesting or other bird species on-site. No nests were observed during 2017 of 2021 field surveys; however, due to the presence of suitable habitat and the migratory nature of bird species, there is potential for migratory birds to use the site for nesting or foraging. Mitigation Measure BIO-6 requires nesting bird surveys prior to the start of work during nesting bird season (February 1–September 1) and identifies the proper protocol if nesting birds are present on-site. Therefore, impacts would be *less than significant with mitigation*.

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

County Inland LUO Chapter 22.58 establishes regulations for clear-cutting oak woodlands. The eastern and southern portions of the project site support oak woodlands; however, the project does not include the removal or trimming of any oak trees for installation of the proposed road. Based on the presence of oak trees at the project site, Mitigation Measure BIO-8 has been included to require implementation of measures for oak tree protection during current and future construction activities. Residential development is not currently proposed, and few oak trees are within or adjacent to future building areas; however, there is potential that future construction activities would require the removal or trimming of oak trees at the project site. In the event any oak trees would be removed or trimmed as part of current or proposed construction activities, Mitigation Measure BIO-9 requires impacted oaks to be replaced on-site. Implementation of the identified mitigation would ensure the project is consistent with the County LUO; therefore, impacts would be *less than significant with mitigation*.

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

A Habitat Conservation Plan (HCP) was prepared for Arroyo Grande Creek in 2004 regarding incidental take of steelhead and California red-legged frog, primarily resulting from work by the San Luis Obispo County Flood Control and Water Conservation District in the creek channel. The HCP extends approximately 10 miles, and its boundaries include Arroyo Grande Creek downstream from Lopez Dam to the flood control channel (Fair Oaks Boulevard). The project would not conflict with the HCP. Therefore, project activities would not result in direct or indirect impacts to Arroyo Grande Creek, and impacts would be *less than significant*.

Conclusion

Future construction activities have the potential to adversely affect biological resources located within the footprint of the proposed project. Mitigation Measures BIO-1 through BIO-9 have been included to reduce potential impacts to biological resources. Therefore, upon implementation of the identified mitigation measures, impacts would be less than significant.

Mitigation

BIO-1 **Biological Monitor. Prior to approval of tract improvement plans,** the applicant shall retain a County-approved biological monitor. The monitor shall be responsible for:

a. ensuring that procedures for verifying compliance with environmental mitigations are implemented;
b. establishing lines of communication and reporting methods;
c. conducting compliance reporting;
d. conducting construction crew training regarding environmentally sensitive areas and protected species (see Mitigation Measure BIO-2);
e. facilitating the avoidance of special-status plants, as feasible;
f. maintaining authority to stop work; and
g. outlining actions to be taken in the event of non-compliance.

The use of heavy equipment and vehicles shall be limited to the proposed project work area, existing roadways, and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with visible flagging prior to project initiation.

Monitoring shall be conducted daily during the initial disturbances (site clearing, including vegetation removal, initial grading, and driveway installation) and be reduced to weekly following initial disturbances or a frequency and duration determined by the applicant in consultation with the County.

The applicant shall submit a copy of the approved contract with the biological monitor for the project to include the scope of work that includes the requirements above. **The biological monitor shall provide reports every 2 weeks to the County Planning and Building Department**, which shall include verification that the measures above have been implemented.

BIO-2 **Worker Awareness Training. Prior to mobilization of any equipment on the project site and installation of project limit fencing/flagging**, the qualified biologist shall conduct an environmental sensitivity training for all project personnel during the project kick-off meeting. The purpose of the training is to educate the personnel on identification of special-status wildlife species that may occur within the project area and to provide an overview of the avoidance and minimization measures to be adhered to during the project. Specifically, the training will emphasize on all special-status wildlife species that would be expected to occur within the project limits, applicable regulatory policies and provisions regarding their protection, and a review of measures being implemented to avoid and/or minimize impacts to the species and their associated habitat. Furthermore, crew members will be briefed on the reporting process in the event that an inadvertent injury should occur to a special-status species during construction.

BIO-3 **Special-Status Reptiles. Prior to approval of tract improvement plans but within two weeks prior to site disturbance**, a preconstruction survey for legless lizards and coast horned lizards shall be conducted in proposed work areas, as determined by the project biologist.

Within 1 hour prior to initial ground disturbance, grading of the top 18 inches of soil, and tree removal activities, preconstruction surveys shall be completed by the biological monitor immediately prior to project grading, excavation, and vegetation removal activities to inspect the work area for any wildlife that may be in the path of heavy equipment.

As part of the preconstruction surveys, in order to avoid potential impacts to sensitive reptiles, leaf litter and sandy areas under shrubs within suitable habitat shall be raked in the areas to be disturbed to a minimum depth of 8 inches. In addition to raking, coverboards shall also be used to capture reptiles. Coverboards shall consist of untreated lumber, sheet metal, corrugated steel, or other flat material, at a minimum size of 4 foot by 4 foot. These coverboards shall be placed in suitable habitat areas at minimum **7 days prior to ground-disturbing activities** and shall be inspected daily. Captured lizards shall be placed in buckets and relocated to a pre-determined location within the area that will not be disturbed by project activities. As necessary, appropriate regulatory agency permits and/or approvals shall be obtained to allow relocation of special-status species (i.e., Blainville's horned lizard [*Phrynosoma blainvillii*], etc.) from the project area.

The preconstruction survey shall be conducted by a qualified biologist familiar with legless lizard and/or coast horned lizard ecology and survey methods. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence of legless lizards or coast horned lizards in the project areas. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required.

BIO-4 **Special-Status Bats. Prior to approval of tract improvement plans but within 2 weeks prior to site disturbance**, including removal of any trees over 20 inches dbh, a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. If a non-maternal roost is found, the biological monitor, with prior approval from the CDFW, will install one-way doors or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height aboveground, and thermal conditions. Maternal bat colonies shall not be disturbed.

BIO-5 **Special-Status Mammals. Prior to approval of tract improvement plans but within 2 weeks prior to site disturbance**, a preconstruction survey shall be conducted to identify if badgers are using the site. The results of the survey shall be sent to the project manager at the County. If the preconstruction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire property and shall examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent re-use of dens during construction. If badgers are found in dens on the property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of

adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100 feet of active badger dens between February and July. Between July 1 and February 1, all potential badger dens shall be inspected to determine if badgers are present. During the winter badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. If badger dens are found on the project site during the preconstruction survey, the CDFW wildlife biologist for the area shall be contacted to review current allowable management practices.

BIO-6 **Nesting and Migratory Birds. Prior to any site disturbance (i.e., mobilization, staging, grading or construction, tree and vegetation removal or trimming)** the County-qualified biologist (see Mitigation Measure BIO-1) shall conduct preconstruction surveys for potential nesting birds within the recognized breeding season (February 1–August 15) in all areas within 500 feet of proposed disturbance areas, or a lesser distance if dense vegetation renders a 500-foot survey radius infeasible. The required survey dates may be modified based on local conditions, as determined by the County-qualified biologist based on observations in the field, with the approval of the County.

If breeding birds with active nests are found prior to or during construction, a biological monitor shall establish an avoidance buffer around the nest for ground-based construction activities and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. Buffers shall be 500 feet for raptors and 100 feet for non-raptor species. Buffers may be adjusted to reflect existing conditions including ambient noise, topography, and disturbance with the approval of the County and must be based on evidence that a reduced buffer will not pose a threat to the success of the nest.

For active nests identified within the survey area, the biological monitor(s) shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The biological monitor(s) shall be responsible for documenting the results of the surveys and ongoing monitoring and will provide a copy of the monitoring reports to the County.

All trees to be removed as part of project-related construction activities will be removed outside of the nesting season to avoid additional impacts to nesting birds. If removal during the nesting season can't be avoided, trees (tree to be removed/impacted and any surrounding trees that are within 100 feet of the tree canopy to be removed/impacted) will be thoroughly surveyed by a County-qualified biologist to ensure that no nests are present. If nests are found within these trees and contain eggs or young, the biological monitor shall establish avoidance buffers as described above until the young have fledged the nest or the nest fails.

BIO-7 **Erosion and Sediment BMPs.** The following erosion and sedimentation control BMPs are required to be implemented during vegetation removal, tract improvements, during individual lot construction, and after the construction phases of the project. BMPs shall be listed on all tract improvement plans, building, and grading plans.

a. If possible, the potential for erosion and sedimentation shall be minimized by scheduling construction to occur outside of the rainy season, which is typically defined as October 15 through April 15.

b. To minimize site disturbance, all construction related equipment shall be restricted to established roads, construction areas, and other designated staging areas.

c. **Prior to any site disturbance during tract improvements or individual lot construction, a Sediment and Erosion Control Plan shall be prepared by a qualified engineer**. The use of silt fence, straw wattles, erosion control blankets, straw bales, sandbags, fiber rolls, and other appropriate techniques should be employed to protect the drainage features on and off the property. Biotechnical approaches using native vegetation shall be used as feasible. All areas with soil disturbance shall have appropriate erosion controls and other stormwater protection BMPs installed to prevent erosion potential. All sediment and erosion control measures shall be installed per the engineer's requirements prior to the initiation of site grading if planned to occur within the rainy season.

d. Spill kits shall be maintained on the site, and a Spill Response Plan shall be in place.

e. No vehicles or equipment shall be refueled within 100 feet of wetland areas, riparian habitat and/or drainage features, and refueling areas shall have a spill containment system installed. No vehicles or construction equipment shall be stored overnight within 100 feet of these areas unless drip pans or ground covers are used. All equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills. Construction staging areas shall be located in a location where spills would not drain into aquatic habitats.

f. No concrete washout shall be conducted on the site outside of an appropriate containment system. Washing of equipment, tools, etc. should not be allowed in any location where the tainted water could enter onsite drainages.

g. The use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state, and federal regulations. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other federal and state legislation.

h. All project-related spills of hazardous materials within or adjacent to the project site should be cleaned up immediately.

i. All areas with soil disturbance shall have appropriate erosion controls and other stormwater protection BMPs installed to prevent erosion potential. Silt fencing, erosion control blankets, straw bales, sandbags, fiber rolls, and/or other types of materials prescribed on the plan shall be implemented to prevent erosion and sedimentation. Biotechnical approaches using native vegetation shall be used as feasible.

j. Areas with disturbed soils shall be restored under the direction of the project engineer in consultation with a qualified restoration ecologist as detailed above. Methods may include recontouring graded areas to blend in with existing natural contours, covering the areas with salvaged topsoil containing native seedbank from the site, and/or applying the native seed mix as described in the table below. Native

seed mix shall be applied to the graded areas in the creek setback area through either direct hand seeding or hydroseeding methods. Seeding with the native erosion control seed mix should be provided on all disturbed soil areas prior to the onset of the rainy season (by October 15).

Native Erosion Control Seed Mix

Species	Application Rate (lbs/acre)
California Brome (*Bromus carinatus*)	10
purple needlegrass (*Stipa pulchra*)	5
tomcat clover (*Trifolium wildenovii*)	5
six weeks fescue (*Vulpia microstachys*)	5
Total	**25**

BIO-8 **Oak Tree Protection. Prior to and during ground disturbing activities**, the following tree protection guidelines and root protection zone shall be implemented for each tree to be retained that occurs within 50 feet of impact areas:

a. All trees to remain within 50 feet of construction or grading activities shall be marked for protection with protective fencing and their root zone fenced prior to any grading. The root zone will be defined at 1.5 times the diameter of the canopy dripline. All activities within the root zone shall be avoided to the extent feasible. If activities within the root zone cannot be avoided, the activity within this area will be considered an impact and shall be mitigated according to Mitigation Measure BIO-9. Substantial impacts such as grading, trenching where roots are damaged or exposed would be considered a permanent impact and shall be mitigated. The applicant shall consider the use of retaining walls where appropriate to minimize cut and fill impacts. Care shall be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they shall be cleanly cut by a certified arborist and not left exposed above the ground surface.

b. Unless previously approved by the county, the following activities are not allowed within the root zone of existing oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plants for up to three years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling).

c. The applicant shall minimize trimming of oak trees to remain onsite. Removal of larger lower branches should be minimized to:

    1. avoid making tree top heavy and more susceptible to "blow-overs;"
    2. reduce having larger limb cuts that take longer to heal and are much more susceptible to disease and infestation;
    3. retain wildlife habitat values associated with the lower branches;

4. retain shade to keep summer temperatures cooler (retains higher soil moisture, greater passive solar potential, provides better conditions for oak seedling volunteers); and
5. retain the natural shape of the tree.

The amount of trimming (roots or canopy) done in any one season shall be limited as much as possible to reduce tree stress/shock (10% or less is best, 25% maximum). If trimming is necessary, the applicant shall use a certified arborist when removing limbs. Unless a hazardous or unsafe situation exists, major trimming shall be done only during the summer months. Trimming greater than 25% of the canopy or roots would be considered an "impacted tree" and shall be mitigated per the measure described below.

BIO-9 **Oak Tree Replacement.** If any tract improvement or construction activities result in the removal of an oak tree, trimming of 25% of its canopy, or encroachment into its critical root zone (critical root zones are typically located within 1.5 times the dripline distance from the tree's trunk) **during construction activities**, the following mitigation shall apply:

a. Replanting onsite of individual oak trees through replanting, maintaining, and monitoring replacement plantings for at least 7 years. Seedling planting will be based on a minimum replacement ratio of 4:1 for oak trees removed and a minimum replacement ratio of 2:1 ratio for oak trees impacted (i.e., disturbance within the root zone area) for the mitigation not fulfilled by conservation easements.

b. Replacement oak trees shall be from regionally or locally collected seed stock grown in vertical tubes or deep 1-gallon tree pots. Four-foot diameter shelters shall be placed over each oak tree to protect it from deer and other herbivores and shall consist of 54-inch-tall, welded wire cattle panels (or equivalent material) and be staked using T-posts. Wire mesh baskets, at least 2 feet in diameter and 2 feet deep, shall be use belowground. Planting during the warmest, driest months (June–September) shall be avoided. A landscape and irrigation plan shall be submitted prior to permit issuance and implemented upon approval by the County Planning and Building Department.

c. Replacement oak trees shall be planted no closer than 20 feet on center on average and shall average no more than four planted per 2,000 square feet. Trees shall be planted in random and clustered patterns to create a natural appearance. As feasible, replacement trees shall be planted in a natural setting on the north side of and at the canopy/dripline edge of existing mature native oak trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g., lawns, irrigated areas, etc.). Replanting areas shall be either in native topsoil or areas where native topsoil has been reapplied. Planting locations shall not result in a displacement of existing sensitive plants or habitats. A seasonally timed maintenance program, which includes regular weeding (hand removal at a minimum of once early fall and once early spring within at least a 3-foot radius from the tree or installation of a staked "weed mat" or weed-free mulch) and a temporary watering program, shall be developed for all oak tree planting areas. A qualified arborist/botanist shall be retained to monitor the acquisition, installation, and maintenance of all oak trees to be replaced. Replacement trees shall be monitored and maintained by a qualified

arborist/botanist for at least 7 years or until the trees have successfully established as determined by the County Environmental Coordinator. **Annual monitoring reports shall be prepared by a qualified arborist/botanist and submitted to the County by October 15 each year**.

V. CULTURAL RESOURCES

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

Setting

The project is located in an area historically occupied by two Native American tribes—the northernmost subdivision of the Chumash, the Obispeño (after Mission San Luis Obispo de Tolosa), and the Salinan. However, the precise location of the boundary between the Chumashan-speaking Obispeño Chumash and their northern neighbors, the Hokan-speaking Playanos Salinan, is currently the subject of debate, as those boundaries may have changed over time.

San Luis Obispo County possesses a rich and diverse cultural heritage and therefore has a wealth of historic and prehistoric resources, including sites and buildings associated with Native American habitation, Spanish missionaries, immigrant settlers, and military branches of the United States.

As defined by CEQA, a historical resource includes:

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

Pursuant to CEQA, a resource included in a local register of historic resources or identified as significant in an historical resource survey shall be presumed to be historically or culturally significant. Public agencies

must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

A Phase I Archaeological Surface Survey was conducted for the proposed project in September 2018 (Heritage Discoveries Inc. 2018). The records search did not identify any previously recorded cultural resources within or within a 0.5-mile radius of the project area (Heritage Discoveries Inc. 2018). A surface survey was conducted on July 5, 2017, which identified a series of concrete and stone weirs along the slope of proposed lots one through four. The identified weirs are erosion control structures that were part of government programs from the late 1930s and early 1940s under the Works Progress Administration (WPA). Similar WPA era weirs and related erosion control structures are found on adjacent properties in Corbett Canyon (Heritage Discoveries Inc. 2018). No other archaeological or historical resources were observed within the project area (Heritage Discoveries Inc. 2018).

Discussion

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

The Phase I Archaeological Surface Survey identified a series of WPA era erosion/water control structures from the late 1930s and early 1940s located across all four proposed parcels (Heritage Discoveries Inc. 2018). The weirs are located primarily within the proposed open space easement, and therefore would not be directly impacted by future development. Although these features show average to low integrity, with most experiencing significant deterioration and silting, Mitigation Measure CR-1 has been included to preserve the remaining features by requiring future development to be located a minimum of 20 feet from the structures, as recommended by the Phase I Archaeological Surface Survey. Therefore, impacts would be *less than significant with mitigation*.

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

No archaeological resources were identified within the project site or within a 0.5-mile radius of the site (Heritage Discoveries Inc 2018). Due to the archaeological sensitivity of the region, there is potential for unknown cultural resources to be located within the project area. In accordance with County LUO Section 22.10.040, in the event an unknown cultural resource site is encountered, all work within the vicinity of the find must be halted until a qualified archaeologist is retained to evaluate the nature, integrity, and significance of the find. Therefore, impacts would be *less than significant*.

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

In the event that unknown human remains are uncovered during construction activities, the project would be required to comply with California Health and Safety Code Section 7050.5 and County LUO Section 22.10.040 and halt work until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Therefore, impacts would be *less than significant*.

Conclusion

The project would be required to implement Mitigation Measure CR-1 to avoid disturbance to the WPA era erosion control structures on-site. The project would be required to comply with the County LUO and the California Health and Safety Code in the event unknown cultural resources or human remains are

discovered during project activities. Therefore, with implementation of the identified mitigation, impacts would be less than significant.

Mitigation

CR-1 **WPA Era Erosion Control Structures.** All proposed construction and grading activities shall be located a minimum of 20-feet from all WPA-era erosion control structures onsite. The 20-foot buffer shall be depicted on all final design plans for County approval and shall be delineated onsite during construction activities.

VI. ENERGY

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

Setting

Local Utilities

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

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

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

Local Energy Plans and Policies

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

State Building Code Requirements

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent version of which are referred to as the *2019 Building Energy Efficiency Standards*. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements.

Vehicle Fuel Economy Standards

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

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

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

In January 2012, the CARB approved the Advanced Clean Cars Program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles,

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

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

Discussion

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

Construction activities for the proposed access road, infrastructure improvements, and future residential development would require the use of energy in the form of electricity, diesel fuel, and gasoline for worker and construction vehicles and equipment. Future construction activities would be subject to State and local diesel idling restrictions and other equipment standards. Therefore, construction activity is not anticipated to result in wasteful, inefficient, or unnecessary consumption of energy resources.

Future buildout of the proposed project would result in up to four new residential units and accessory structures that would be subject to green building and California Building Code (CBC) standards. The project would source energy from PG&E, which sources 29% of electricity from renewable resources, 27% is sourced from hydroelectric power, and an additional 44% is sourced from nuclear resources (PG&E 2019). Future development is not anticipated to result in environmental impacts due to wasteful or otherwise inefficient use of energy during project construction or operation; therefore, impacts would be *less than significant.*

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

As previously discussed, future construction activities would require the use of energy in the form of diesel fuel and gasoline for worker and construction vehicles and equipment. Future construction activities would be subject to State and local diesel idling restrictions and other equipment standards. Therefore, future construction activity is not anticipated to result in wasteful or inefficient energy use which would be consistent with applicable renewable energy plans.

In order to be compliant with the County COSE and EWP, the project would be required to reduce GHG emissions where feasible in energy consumption. The project would source energy from PG&E, which sources 29% of electricity from renewable resources, 27% is sourced from hydroelectric power, and an additional 44% is sourced from nuclear resources (PG&E 2019). By utilizing PG&E for

electricity, 100% of the project's electricity demand would be sourced from GHG-free energy sources. The project would comply with CBC 2019 Building Energy Efficiency Standards and 2019 Green Building Code and is not anticipated to result in wasteful use of energy. Therefore, the project would be compliant with applicable energy efficiency plans and impacts would be *less than significant*.

Conclusion

Implementation and buildout of the proposed project would result in additional residential units on the project site. Energy would be sourced from GHG-free sources and would be subject to green building and CBC standards for energy efficiency. The project would not result in excessive energy use during construction or operation. Therefore, impacts would be less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
(iv) Landslides?	☐	☒	☐	☐
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐

Initial Study – Environmental Checklist

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) is a California state law that was developed to regulate development near active faults and mitigate the surface fault rupture potential and other hazards. The Alquist-Priolo Act identifies active earthquake fault zones and restricts the construction of habitable structures over known active or potentially active faults. San Luis Obispo County is in a geologically complex and seismically active region. The *County of San Luis Obispo General Plan Safety Element* identifies three active faults that traverse through the county and are currently zoned under the Alquist-Priolo Act: the San Andreas, the Hosgri-San Simeon, and the Los Osos. The project site is located approximately 2 miles west of the Los Osos fault zone, approximately 3.3 miles southwest of the West Huasna fault zone, and approximately 2.3 miles northeast of the Wilmar Avenue fault (DOC 2015).

Ground shaking refers to the motion that occurs in response to local and regional earthquakes. Seismic ground shaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition. Ground shaking can endanger life and safety due to damage or collapse of structures or lifeline facilities. The CBC includes requirements that structures be designed to resist a certain minimum seismic force resulting from ground motion.

The County LUO identifies a Geologic Study Area (GSA) combining designation for areas where geologic and soil conditions could present new developments and/or their occupants with potential hazards to life and property. The project site is not located within the County LUO Geologic Study Area (GSA) combining designation. Landslides and slope instability can occur as a result of wet weather, weak soils, improper grading, improper drainage, steep slopes, adverse geologic structure, earthquakes, or a combination of these factors. Liquefaction is the sudden loss of soil strength due to a rapid increase in soil pore water

pressures resulting from ground shaking during an earthquake. The project site is located in an area with low and moderate landslide potential and low and moderate liquefaction potential (County of San Luis Obispo 2021).

Shrink/swell potential is the extent to which the soil shrinks as it dries out or swells when it gets wet. Extent of shrinking and swelling is influenced by the amount and kind of clay in the soil. Shrinking and swelling of soils can cause damage to building foundations, roads, and other structures. A high shrink/swell potential indicates a hazard to maintenance of structures built in, on, or with material having this rating. Moderate and low ratings lessen the hazard accordingly. Based on the NRCS Soil Survey of the project site, the project is in an area with soils with a low potential for shrink swell (USDA 2021).

The County Local Agency Management Program (LAMP) develops minimum standards for the treatment and disposal of sewage through onsite wastewater treatment systems. The LAMP is the culmination of the actions required by Assembly Bill 885 and the State Water Resources Control Board to develop regulations and standards for onsite wastewater treatment systems. The County of San Luis Obispo LAMP is designed to protect surface water and groundwater from contamination while providing flexibility in design criteria in consideration of local conditions. LAMP standards also include requirements for minimum subdivision parcel size for parcels served by septic systems (County of San Luis Obispo 2020). The project site is within an area requiring a minimum of 2.0 acres per each single family dwelling unt.

The County COSE identifies a policy for the protection of paleontological resources from the effects of development by avoiding disturbance where feasible. Where substantial subsurface disturbance is proposed in paleontologically sensitive units, Implementation Strategy CR 4.5.1 (Paleontological Studies) requires a paleontological resource assessment and mitigation plan be prepared, to identify the extent and potential significance of resources that may exist within the proposed development and provide mitigation measures to reduce potential impacts to paleontological resources.

Discussion

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

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

There are no Alquist-Priolo faults located under or near the project site. Therefore, rupture of a known earthquake fault would not occur under the project site and *no impacts* would occur.

(a-ii) Strong seismic ground shaking?

The central coast is a seismically active region and there is always potential for seismic activity. The project site is located approximately 2 miles west of the Los Osos fault zone, approximately 3.3 miles southwest of the West Huasna fault zone, and approximately 2.3 miles northeast of the Wilmar Avenue fault (DOC 2015). Future residential and associated development would be required to comply with Chapter 1613 of the 2019 California Building Code (CBC) and other engineering practices and standards to adequately withstand and minimize the risk associated with the level of seismic ground shaking expected to occur in the project region; therefore, impacts associated with strong seismic ground shaking would be *less than significant.*

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

According to the County Safety Element maps, the project site has low and moderate potential for liquefaction, with the moderate portion of the site primarily on Parcel 1. Section 18 of the CBC requires geotechnical investigations to be conducted by a qualified engineer prior to development to determine soil conditions at the site and provide design recommendations to be implemented. In addition, future development would be required to comply with Section 1613 of the CBC in order to withstand and reduce risks associated with seismic ground-failure. Therefore, based on required compliance with existing requirements, impacts would be *less than significant*.

(a-iv) Landslides?

According to the County Safety Element maps, the project site has a low and moderate potential for landslides, with the moderate portion of the site primarily located within the proposed open space easement. Section 18 of the CBC requires geotechnical investigations to be conducted by a qualified engineer prior to development to determine soil conditions at the site and provide design recommendations to be implemented. In addition, the proposed access road and future residential development would be required to be designed and constructed in accordance with the most recent CBC standards and requirements to minimize risk associated with landslides. Therefore, potential impacts would be *less than significant*.

(a-v) Result in substantial soil erosion or the loss of topsoil?

The project includes the subdivision of a single 24-acre parcel into four new lots, the development of a new access road and public utility easement, and the future development of new residential units and associated structures. Implementation and future buildout of the proposed project would increase soil erosion and loss of topsoil during construction activity. The project includes 1.31 acres of site disturbance including 1,816 cy of cut and 2,925 cy of fill for the access improvements. Additional site disturbance and grading quantities related to future residential development are unknown. Implementation and future buildout of the proposed project would increase soil erosion and loss of topsoil during construction activity. According to County LUO Section 22.52.130, projects that disturb more than 1 acre of soil or that may result in substantial degradation of water quality are required to prepare a SWPPP with BMPs under the National Pollution Discharge Elimination System (NPDES). The project would be required to prepare a SWPPP prior to issuance of grading or construction permits. A SWPPP would include, but is not limited to, identification of potential pollutants, BMPs, and an Erosion and Sedimentation Control Plan. Preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects (County LUO Section 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project would implement standard construction BMPs and other applicable regulations to reduce erosive and polluted runoff that may result from earthwork required for the project. In addition, Mitigation Measure BIO-7 includes construction BMPs to reduce sedimentation and erosion during construction activities. Therefore, impacts would be *less than significant with mitigation*.

(b) 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?

According to the USGS Areas of Land Subsidence in California Map, the project site is not located in an area with known subsidence (USGS 2021). The project site is located in an area with low and moderate landslide and liquefaction potential (County of San Luis Obispo 2021). The project would be required to comply with the most recent CBC to adequately withstand and minimize risk associated with potential ground-failure events; therefore, impacts would be *less than significant*.

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

Typically, expansive soils are comprised of clay or clay materials. The project site is underlain by sandy soils with a low shrink-swell potential. Therefore, future development would not be located on expansive soil, and *no impacts* would occur.

(d) 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?

Future residential development would require the installation of individual septic systems to serve the residential units. Percolation testing was conducted at the project site and determined that groundwater is more than 100 feet deep and project soils have very high percolation rates (GeoSolutions 2017). Compliance with CBC and County Environmental Health standards would ensure that future septic systems are designed and installed in a manner to adequately handle wastewater from future development.

According to the LAMP, the allowable minimum parcel size of a subdivision on this site, based on annual average rainfall, is 2 acres. The LAMP further states that proposed parcels utilizing an onsite waste treatment system (e.g., septic) and an onsite domestic well shall have a minimum parcel size of at least 2.5 acres. Based on required compliance with the LAMP, CBC, and County Environmental Health standards regarding septic systems, impacts would be *less than significant*.

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

The project site is underlain by the Pismo formation, which has a high paleontological sensitivity (City of Pismo Beach 2020). Ground disturbance, including excavation, grading, and vegetation removal, would be required for the proposed access road and public utility easement and future ground disturbance for residential development. The project includes 1.31 acres of site disturbance including 1,816 cy of cut and 2,925 cy of fill for the access improvements. Based on the high potential for paleontological resources to be located within the Pismo formation, Mitigation Measures GEO-1 through GEO-3 has been identified to require paleontological monitoring during proposed and future ground disturbance activities and identifies the proper protocol in the event a paleontological resource is uncovered during project activities. Therefore, impacts would be *less than significant with mitigation*.

Conclusion

Proposed site improvements and future residential development would be required to comply with the most current CBC and County Public Works requirements, which would reduce potential risk associated with ground failure. Compliance with the CBC and Environmental Health standards would ensure that future septic systems would be designed and installed in a manner to adequately handle wastewater from future

development. In addition, the project site is located within an area with high paleontological sensitivity and Mitigation Measures GEO-1 through GEO-3 have been included to require paleontological monitoring during ground disturbance. With required compliance with existing development requirements and implementation of the identified mitigation, potential impact would be less than significant.

Mitigation

Implement Mitigation Measure BIO-7, in addition to the following mitigation measures.

GEO-1 **At time of application for tract improvement plans or grading permits**, the applicant shall retain a County-approved paleontologist to prepare a Paleontological Monitoring and Treatment Plan (Plan, PMTP), and submit the Plan to the County for review and approval. The Plan shall be based on 'Society of Vertebrate Paleontology (SVP) guidelines' and meet all regulatory requirements. The County-approved paleontologist shall: a) have a Master's Degree or Ph.D. in paleontology, b) shall have knowledge of the local paleontology, and c) shall be familiar with paleontological procedures and techniques. The Plan shall:

a. identify construction impact areas of moderate to high sensitivity for encountering potential paleontological resources and the shallowest depths at which those resources may be encountered;
b. detail the criteria to be used to determine whether an encountered resource is significant, and if it should be avoided or recovered for its data potential;
c. detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting;
d. outline a coordination strategy to ensure that a County-approved paleontological monitor will conduct full-time monitoring of all grading activities in the "deeper" sediments determined to have a moderate to high sensitivity. For sediments of low or undetermined sensitivity, the Plan shall determine what level of monitoring is necessary. Sediments with no sensitivity will not require paleontological monitoring.
e. define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors shall be defined by the project paleontological resource specialist, following examination of sufficient, representative excavations.

GEO-2 **Prior to approval of tract improvement plans and any ground disturbing activities**, based on the Mitigation Measure GEO-2, the Applicant shall conduct monitoring by a County-approved paleontological monitor as specified in the approved PMTP. This shall include monitoring during rough grading and trenching in areas determined to have moderate to high paleontological sensitivity and which have the potential to be shallow enough to be adversely affected by such earthwork. Sediments of low, marginal undetermined sensitivity shall be monitored by a County-approved paleontological monitor on a part-time basis as determined in the PMTP.

The Qualified Monitor shall verify they have a B.A. in Geology or Paleontology and a minimum of one year of paleontological monitoring experience in local or similar sediments. Construction activities shall be diverted when data recovery of significant fossils is warranted, as determined in the PMTP. Compliance/Monitoring shall adhere to and be consistent with the PMTP.

GEO-3 **During proposed and future ground-disturbing activities,** if any paleontological resources are encountered, activities in the immediate area of the find shall be halted and the discovery assessed in accordance with the approved PMTP. A qualified paleontologist shall be retained to evaluate the discovery and recommend appropriate treatment options pursuant to guidelines developed by the Society of Vertebrate Paleontology. A paleontological resource impact mitigation program for treatment of the resources shall be developed and implemented if paleontological resources are encountered. If deemed significant, the paleontological resource(s) shall be salvaged and deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.

VIII. GREENHOUSE GAS EMISSIONS

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

Setting

GHGs are any gases that absorb infrared radiation in the atmosphere. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), NO_x, and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement). Carbon dioxide (CO_2) is the most abundant GHG and is estimated to represent approximately 80–90% of the principal GHGs that are currently affecting the earth's climate. According to the California Air Resources Board (CARB), transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

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

Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extended the state's GHG reduction goals and require CARB to regulate sources of GHGs to meet the following goals:

- Reduce GHG emissions to 1990 levels by 2020;
- Reduce GHG emissions to 40% below 1990 levels by 2030;
- Reduce GHG emissions to 80% below 1990 levels by 2050.

The initial Scoping Plan was first approved by CARB on December 11, 2008, and is updated every 5 years. The first update of the Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) toward reaching the 2050 goals. The most recent update released by CARB is the 2017 Climate Change Scoping Plan, which was released in November 2017. The 2017 Climate Change Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05.

When assessing the significance of potential impacts for CEQA compliance, an individual project's GHG emissions will generally not result in direct significant impacts because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation. Accordingly, in March 2012, the SLOAPCD approved thresholds for GHG impacts which were incorporated into their 2012 CEQA Air Quality Handbook. The Handbook recommended applying a 1,150 $MTCO_2e$ per year Bright Line Threshold for commercial and residential projects and included a list of general land uses and estimated sizes or capacities of uses expected to exceed this threshold. According to the SLOAPCD, this threshold was based on a 'gap analysis' and was used for CEQA compliance evaluations to demonstrate consistency with the state's GHG emission reduction goals associated with AB32 and the 2008 Climate Change Scoping Plan which have a target year of 2020. However, in 2015, the California Supreme Court issued an opinion in the case of *Center for Biological Diversity vs California Department of Fish and Wildlife* ("Newhall Ranch") that determined that AB 32 based thresholds derived from a gap analysis are invalid for projects with a planning horizon beyond 2020. Since the bright-line and service population GHG thresholds in the Handbook are AB 32 based, and project horizons are now beyond 2020, the SLOAPCD no longer recommends the use of these thresholds in CEQA evaluations. Instead, the following threshold options are recommended for consideration by the lead agency:

- No-net Increase: The 2017 Scoping Plan states that no-net increase in GHG emissions relative to baseline conditions "*is an appropriate overall objective for new development*" consistent with the Court's direction provided by the Newhall Ranch case. Although a desirable goal, the application of this threshold may not be appropriate for a small project where it can be clearly shown that it will not generate significant GHG emissions (i.e., di minimus: too trivial or minor to merit consideration).
- Lead Agency Adopted Defensible GHG CEQA Thresholds: Under this approach, a lead agency may establish SB 32-based local operational thresholds. As discussed above, SB 32 requires the state to reduce GHG levels by 40 percent below 1990 levels by the year 2030. According to the *California Greenhouse Gas Emissions for 2000 to 2017, Trends of Emissions and Other Indicators* published by the California Air Resources Board, emissions of GHG statewide in 2017 were 424 million $MMTCO_2e$, which was 7 million MTCO2e *below* the 2020 GHG target of 431 $MMTCO_2e$ established by AB 32. Therefore, application of the 1,150 $MTCO_2e$ Bright Line Threshold in San Luis Obispo County, together with other local and State-wide efforts to reduce GHG emissions, proved to be an effective approach for achieving the reduction targets set forth by AB32 for the year 2020. It should be noted that the 1,150 $MTCO_2e$ per year Bright Line Threshold was based on the assumption that a project with the potential to emit less than 1,150 $MTCO_2e$ per year would result in impacts that are less than significant and less than cumulatively considerable impact and would be consistent with state and local GHG reduction goals.

Since SB 32 requires the state to reduce GHG levels by 40 percent below 1990 levels by the year 2030, the application of an interim "bright line" SB32-based working threshold that is 40 percent below the 1,150 $MTCO_2e$ Bright Line threshold (1,150 x 0.6 = 690 $MTCO_2e$) would be expected to produce comparable GHG reductions "in the spirit of" the targets established by SB32. Therefore, for the purpose of evaluating the significance of GHG emissions for a project after 2020, emissions estimated to be less than 690 $MTCO_2e$ per year GHG are considered *de minimus* (too trivial or minor to merit consideration), and will have a less than significant impact that is less than cumulatively considerable and consistent with state and local GHG reduction goals.

Discussion

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

During construction, fossil fuels and natural gas would be used by construction vehicles and equipment. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices. In addition, the project would implement Mitigation Measure AQ-1, which would further reduce diesel idling emissions during construction activities.

Operational emissions would come primarily from vehicle trips to and from the project site and residential energy use. Additional residential units onsite would result in a minimal increase in vehicle trips to and from the project site. Energy for the project would be supplied by PG&E which sources approximately 39% of electricity from renewable resources and an additional 47% is sourced from non-renewable GHG-free resources (PG&E 2019). Operational energy use is not anticipated to generate a significant amount of GHGs because it is sourced primarily from GHG-free resources.

The project is not expected to generate GHG emissions that would exceed existing interim thresholds and Mitigation Measure AQ-1 would further reduce construction-related GHG emissions; therefore, impacts would be *less than significant*.

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

Implementation of the project would result in the future construction of four new residential units and associated structures within the Residential Suburban (RS) land use designation.

Energy inefficiency contributes to higher GHG emissions and would which in turn may conflict with state and local plans for energy efficiency. As discussed above, the EWP, adopted in 2011, serves as the County's GHG reduction strategy. The GHG-reducing policy provisions contained in the EWP were prepared for the purpose of complying with the requirements of AB 32 and achieving the goals of the AB 32 Scoping Plan, which have a horizon year of 2020. The policy provisions are divided into community-wide measures and measures aimed at reducing GHG emissions associated with County operations. The GHG reduction measures contained in the EWP are generally programmatic and intended to be implemented at the community level. Measure No. 7 encourages energy efficient new development and provides incentives for new development to exceed CALGreen energy efficiency standards. The following is a summary of project consistency with the relevant supporting actions identified in Measure No. 7 for promoting energy efficiency in new development.

Supporting Action	Project Consistency
Require the use of energy-efficient equipment in all new development, including but not limited to Energy Star appliances, high-energy efficiency equipment, heat recovery equipment, and building energy management systems.	Future residential development would be required to comply with all 2019 California Building Code (CBC) Energy Efficiency Standards and the 2019 Green Building Code standards to ensure new development is energy efficient.
Encourage new projects to provide ample daylight within the structure through the use of lighting shelves, exterior fins, skylights, atriums, courtyards, or other features to enhance natural light penetration.	Future residential development, including roof design and natural light features, would be consistent with all 2019 California Building Code (CBC) Energy Efficiency Standards and the 2019 Green Building Code standards to ensure new development is energy efficient.
Minimize the use of dark materials on roofs by requiring roofs to achieve a minimum solar reflectivity index (SRI) of 10 for high-slope roofs and 64 for low-slope roofs (CALGreen 5.1 Planning and Design).	
Minimize heat gain from surface parking lots.	The project does not propose new parking lots.
Use light-colored aggregate in new road construction and repaving projects adjacent to existing cities and in some of the communities north of the Cuesta Grade.	The project site is not located north of the Cuesta Grade.

The 2019 RTP, which was adopted by the SLOCOG Board in June 2019, includes the region's Sustainable Communities' Strategy and outlines how the region will meet or exceed its GHG reduction targets by creating more compact, walkable, bike-friendly, transit-oriented communities, preserving important habitat and agricultural areas, and promoting a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network. The RTP and SCS provide guidance for the development and management of transportation systems county-wide to help achieve, among other objectives, GHG reduction goals. The RTP/SCS recommend strategies for community planning such as encouraging mixed-use, infill development that facilitate the use of modes of travel other than motor vehicles.

The project consists of the development of rural residential units within the Residential Suburban land use designation. As discussed in Section III, Air Quality, the project does not include development of retail, business, or commercial uses that would be open to the public, therefore, land use planning strategies such as mixed-use development and planning compact communities are generally not applicable. The project would result in the establishment of activities that are residential in nature and would not result in employment opportunities or a substantial population increase in the project area.

Pursuant to AB 32, the California Air Resources Board (CARB or Board) prepared and adopted the initial Scoping Plan to "*identify and make recommendations on direct emissions reductions measures, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives*" in order to achieve the 2020 goal, and to achieve "*the maximum technologically feasible and cost-effective GHG emissions reductions*" by 2020 and maintain and continue reductions beyond 2020. AB 32 requires CARB to update the Scoping Plan at least every five years.

The 2017 Climate Change Scoping Plan recommends strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05. These strategies include the following:

- Implement SB350 which is aimed at Reduce GHG emissions in the electricity sector;
- 2030 Low Carbon Fuel Standard (LCFS) -- Transition to cleaner/less-polluting fuels that have a lower carbon footprint.
- 2030 Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario) -- Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of vehicle miles traveled.
- Implement SB 1383 which is aimed at reducing Short-Lived Climate Pollutants to reduce highly potent GHGs.
- Implement the 2030 California Sustainable Freight Action Plan aimed at improving freight efficiency, transition to zero emission technologies, and increase competitiveness of California's freight system.
- Implement the 2030 Post-2020 Cap-and-Trade Program which is aimed at reducing GHGs across the largest GHG emissions sources.

The strategies described in the 2017 Scoping Plan are programmatic and intended to be implemented state-wide and industry wide. They are therefore not applicable at the level of an individual project. However, as discussed in Section XVII, Transportation, the project is not expected to exceed existing VMT thresholds during construction-related or operational traffic trips or Vehicle Miles Traveled (VMT) which is consistent with Scoping Plan strategies for reducing vehicle miles traveled and transportation-related GHG emissions. Overall, the project is consistent with adopted plans and policies aimed at reducing GHG emissions and impacts would be *less than significant*.

Conclusion

Implementation and buildout of the proposed project would result in additional residential units and associated structures on the project site. The project would be compliant with GHG reduction standards during construction and operation through compliance with diesel idling restrictions, green building standards, and applicable GHG-reduction strategies. Therefore, impacts would be less than significant. Mitigation Measure AQ-1 would further reduce construction-related GHG emissions through specific diesel idling restrictions.

Mitigation

Impacts would be less than significant and would be further reduced with implementation of Mitigation Measure AQ-1; however, no mitigation is necessary.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

Setting

The Hazardous Waste and Substances Site List (Cortese List), which is a list of hazardous materials sites compiled pursuant to California Government Code (CGC) Section 65962.5, is a planning document used by

the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. The project site is not in an area of known hazardous material contamination and is not on a site listed on the Cortese List (SWRCB 2021; California Department of Toxic Substance Control [DTSC] 2021).

Based on the SLOAPCD NOA screening, map, the project is not located in an area with potential for soils containing NOA (SLOAPCD 2021).

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

The California Health and Safety Code provides regulations pertaining to the abatement of fire-related hazards and requires that local jurisdictions enforce the CBC, which provides standards for fire resistive building and roofing materials, and other fire-related construction methods. The County Safety Element provides a Fire Hazard Zones Map that indicates unincorporated areas in the county within high and very high Fire Hazard Severity Zones (FHSZs). The project would be located within the State Responsibility Area in a high FHSZ. Emergency response time to the project site is approximately 5-10 minutes. For more information about fire-related hazards and risk assessment, see Section XX, Wildfire.

Discussion

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

Project construction would require the use of limited quantities of hazardous substances (e.g., 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 response and clean-up requirements for any minor spills. Therefore, proposed construction activity is not anticipated to result in hazard to the public due to routine transport, use, or disposal of hazardous materials.

Operation of the project is not expected to require routine transport, use, or disposal of hazardous materials that would lead to significant upset in the event of an accidental spill. The project would result in the operation of new rural residences that would generate common household waste. Household waste would be stored and hauled in accordance with County regulations; therefore, impacts would be *less than significant*.

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

As described above, future construction of the proposed project is 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 response and clean-up requirements for any minor spills. The project does not require demolition that could release ACM or other potential hazards. Operation of the project does not require the use of hazardous materials or volatile substances beyond common household materials that would result in a significant risk of upset or accidental release conditions.

Due to the presence of the unnamed drainage and seasonal wetland habitat onsite, Mitigation Measure BIO-7 has been included to require a SWPPP with BMPs to reduce the potential for project

activities to result in increased pollution or an accidental spill from vehicle refueling, vehicle and machine washing, or other construction-related activities. Therefore, with implementation of Mitigation Measure BIO-7, impacts would be *less than significant with mitigation*.

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

The nearest school is Paulding Middle School, located approximately 1.7 miles southeast of the project site. Paulding Middle School is not located within one-quarter mile of the project site; therefore, *no impacts* would occur.

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

According to the SWRCB GeoTracker database and DTSC EnviroStor database, the project is not located in an area of known hazardous material contamination and is not on a site listed on the "Cortese List" pursuant to Government Code Section 65962.5. Therefore, the project would not be located on a known hazardous materials site and *no impacts* would occur.

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

The project is not located within an airport land use plan and is not located within two miles of an airport. Therefore, there would be no risk of exposing persons to a safety hazard or excessive noise from the operation of the airport and *no impacts* would occur.

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

The project includes the subdivision of a single 24-acre parcel into for new lots and construction of a new 50-foot-wide access road and utility easement. Future construction would include vegetation removal, grubbing, excavation, and construction of individual residences and associated structures. Construction activities may include temporary traffic controls along oak hill drive; however, the project does not require road closures and emergency access would be available during construction. The proposed access road would be designed and constructed according to County Public Works and CALFIRE requirements to allow for proper emergency vehicle access; therefore, impacts would be *less than significant*.

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

According to CALFIRE, the project site is located in a high fire hazard severity zone (FHSZ) within a State Responsibility Area (SRA) (CALFIRE 2021). Implementation and future buildout of the proposed project would result in the development of a new access road and public utility easement, new residential units, and associated parcel improvements within a high fire hazard severity zone. The proposed 50-foot-wide access road and public utility easement would be constructed according to CALFIRE and County Public Works requirements for emergency access. Future residential development would be required to comply with CALFIRE recommendations for internal roads, driveways, gates, addressing, landscaping, and adherence to the California Fire Code. Additionally,

future development would be required to comply with the California Building Code (CBC) to protect new development within a high and very high FHSZ; therefore, impacts would be *less than significant*.

Conclusion

Mitigation Measure BIO-9 would require implementation of BMPs to reduce potential impacts related to accidental spill or other pollutants to less than significant. There are no known hazardous materials sites on the project property. The project site is not located within one-quarter mile of a school and is located more than 2 miles away from the nearest airport. The project would result in future development within a high and very high FHSZ and would be subject to CAL FIRE, County, and CBC standards for development within a high and very high FHSZ. Therefore, impacts would be less than significant with mitigation.

Mitigation

Implement Mitigation Measure BIO-7.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) Impede or redirect flood flows?	☐	☐	☒	☐
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

Setting

The RWQCB Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2019) describes how the quality of surface water and groundwater in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Basin Plan outlines the beneficial uses of streams, lakes, and other water bodies for humans and other life. There are 24 categories of beneficial uses, including, but not limited to, municipal water supply, water contact recreation, non-water contact recreation, and cold freshwater habitat. Water quality objectives are then established to protect the beneficial uses of those water resources. The RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose discharges can affect water quality.

The County LUO dictates which projects are required to prepare a drainage plan, including any project that would, for example, change the runoff volume or velocity leaving any point of the site, result in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent. Preparation of a drainage plan is not required where grading is exclusively for an exempt agricultural structure, crop production, or grazing. The County LUO also dictates that an erosion and sedimentation control plan is required year-round for all construction and grading permit projects and site disturbance activities of 0.5 acre or more in geologically unstable areas, on slopes steeper than 30 percent, on highly erodible soils, or within 100 feet of any watercourse.

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

Projects that disturb less than 1 acre must implement all required elements within the site's erosion and sediment control plan as required by the County LUO.

For planning purposes, the flood event most often used to delineate areas subject to flooding is the 100-year flood. The County Safety Element establishes policies to reduce flood hazards and reduce flood damage, including, but not limited to, prohibition of development in areas of high flood hazard potential, discouragement of single-road access into remote areas that could be closed during floods, and review of plans for construction in low-lying areas. Approximately 200 feet of the western portion of Parcel 1, adjacent to Corbett Canyon Road, is within a 100-year flood zone.

There is an unnamed drainage that flows in an east to west direction through the project site and connects to a roadside ditch along Corbett Canyon Road (KMA 2017).

Discussion

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

The project area consists of relatively flat to steeply sloping topography on a 24-acre parcel. There is an unnamed drainage that traverses the project parcel in an east to west direction and connect to a roadside ditch along Corbett Canyon Road (KMA 2017). The project would result in site improvements, which includes construction of a 50-foot-wide access road and public utility easement that would result in 1.31 acres of ground disturbance. In addition, future buildout of the project area would result in the development of four new residential units, accessory structures, and other necessary parcel improvements.

Proposed and future construction activity would require grading and other earthwork that has the potential to increase erosion and sedimentation onsite and the use of construction vehicles and equipment has the potential to increase pollution onsite that could runoff and result in degradation to nearby water features. The project would be required to comply with RWQCB requirements and prepare a SWPPP. Mitigation Measure BIO-7 includes construction BMPs to reduce runoff during construction activities. In addition, preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects (County LUO Section 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project would implement standard construction BMPs and other applicable regulations to reduce erosive and polluted runoff that may result from earthwork required for the project. Therefore, impacts would be *less than significant with mitigation*.

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

The project would result in the development of a 50-foot-wide paved access road and public utility easement, four residential homes, and accessory structures on previously undeveloped 24-acre parcel. Although implementation of the project would reduce the amount of pervious surface at the site, the project is not anticipated to interfere with groundwater recharge at the site because the majority of the parcel would remain undeveloped. In addition, the existing unnamed drainage and roadside ditch would be avoided through a proposed open space easement, which would result in the maintenance of existing drainages and recharge abilities at the site. Therefore, implementation of the project is not anticipated to interfere with groundwater recharge at the site.

Water for the project site would be supplied by four proposed wells that were drilled in 2017. Details regarding water quantity and water quality of the existing wells are further discussed in Section XIX, Utilities and Service Systems, Impact Discussion XIX.b.

An addendum to the Groundwater Impact and Water Supply Assessment Report (GIWSAR) of Sweet Springs MHP, Hondonada and Greenview Estates was prepared to estimate the annual flux of water within the project area and identify the potential cumulative water level impact on adjacent properties due to pumping of their respective wells (CHG 2018). The current water balance for the project vicinity for drought years is a 41 acre-feet (AF) deficit and has the potential to recharge 137 AF of surplus water during average precipitation years. At the end of a drought period, the surplus water from average precipitation is available to replenish the decline from drought years, though the amount of recharge is dependent on how full the aquifer is. Upon buildout of anticipated projects and underdeveloped properties, the water balance for drought years would experience a 57 AF deficit and would have the potential to recharge 121 AF during average precipitation years. Depending how full the aquifers are, only a portion of the available recharge during years of average precipitation may percolate into the aquifer (CHG 2018). The results of this analysis imply that in a given drought year, or series of drought years, the groundwater system in the study area may have a deficit in which outflows exceed inflows. However, a water balance may be achieved over a longer time period, as groundwater surpluses from the average years equal or exceed the deficits from the drought years. Under the proposed buildout scenario, the amount of the average year surplus is about two times the amount of the drought year deficit, implying that the impacts of two years of drought in the study area would be offset by a single average year. Implications of the study are that during individual or successive drought years, a reduction of storage may occur, which may be observed in individual wells as a decline in water levels; however, over a multi-year time frame, conditions in the average years would replenish the depleted storage and water levels would likely recover (GSI 2018).

Based on the information available, there doesn't appear to be a long-term issue regarding water quality; during drought years some users may experience more problems than others given site specifics, but average years would be able to offset this. Implementation of drought-management plans would help balance the potential problems during drought years. Given the uncertainties with small water systems (water systems serving more than 4 connections) and the cumulative effectiveness of differing drought-management efforts, a broader water agency would be better able to balance the regional needs of the aquifer area. Mitigation Measures USS-1 through USS-4 include drought reduction measures in order to preserve water quantity in the existing well. With implementation of drought reduction measures, the project is not anticipated to interfere with a sustainable groundwater management plan; therefore, impacts would be *less than significant with mitigation.*

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

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

Proposed and future construction activities have the potential to temporarily alter existing drainage patterns onsite and buildout of the project would result in an increase of impervious surface areas that may result in increased erosion and siltation that could run off site. The project would be required to prepare and implement a SWPPP with BMPs in accordance with RWQCB requirements. Mitigation Measure BIO-7 includes construction BMPs to reduce runoff during construction

activities. In addition, the project would be required to prepare and implement an Erosion and Sedimentation Control Plan is required for all construction and grading projects (County LUO Section 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project would implement standard construction BMPs and other applicable regulations to reduce erosive and polluted runoff that may result from earthwork required for the project. Therefore, impacts would be *less than significant with mitigation*.

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

The project includes a proposed open space easement that would encompass the unnamed drainage; therefore, the project would avoid work within or alteration of the existing drainage onsite. Development of the parcel would result in increased impervious surface area that could result in an increase in surface runoff from the site. The applicant will be required to comply with Land Use Ordinance and Regional Water Quality Control Board requirements regarding drainage, sedimentation, and erosion control. A drainage plan will be required and will need to show that increased surface runoff would have not more impacts than those caused by historic flows. No additional measures beyond ordinance requirements are necessary and impacts would be *less than significant.*

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

The project would result in the future development of a 50-foot-wide access road and public utility easement, four new residential units, accessory structures, and other necessary parcel upgrades including expanded utility infrastructure and road improvements. Buildout of the site would result in increased impervious surface area that may result in an increase in surface runoff. The project site is not located within the MS4 stormwater area; however, the project would be required to prepare and implement an Erosion and Sedimentation Control Plan as is required for all construction and grading projects (County LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The Erosion and Sedimentation Control Plan would account for long-term runoff from the project area in order to reduce pollutant runoff from increased surface runoff; therefore, impacts would be *less than significant*.

(c-iv) Impede or redirect flood flows?

There is a 100-year flood zone located along the eastern project boundary in a north to south direction through proposed Lot 1 (FEMA 2020). Buildout of the site would result in increased impervious surface area that may facilitate flood flows in the project area. Future residential development on proposed Lot 1 would be located outside of the 100-year flood zone. The project site is not located within the MS4 stormwater area; however, the project would be required to prepare and implement an Erosion and Sedimentation Control Plan as is required for all construction and grading projects (County LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The Erosion and Sedimentation Control Plan would account for long-term runoff from the project area in order to reduce pollutant runoff from increased potential flood flows; therefore, impacts would be *less than significant*.

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

There is a 100-year flood zone located along the eastern project boundary (FEMA 2020). An Erosion and Sedimentation Control Plan would be prepared and implemented per the County LUO, and a SWPPP would be prepared for construction of road improvements to avoid or minimize potential pollutant release. The project is not at risk for tsunami or seiche due to distance from bodies of water. Due to the project's location and required compliance with existing requirements, there is low potential for pollutant release due to project inundation; therefore, impacts would be *less than significant*.

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

As discussed above, implementation of the project would be required to comply with the County LUO and prepare an Erosion and Sedimentation Control Plan and a SWPPP with BMPs. In addition, implementation of Mitigation Measures USS-1 through USS-4 would ensure that the project would not interfere with a basin management plan. Therefore, based on compliance with existing regulations and implementation of the identified mitigation measures, impacts would be *less than significant with mitigation*.

Conclusion

Future construction activities are not anticipated to increase erosion, sedimentation, and pollution based on implementation of a SWPPP and an Erosion and Sedimentation Control Plan in accordance with RWQCB requirements and County LUO Section 22.52.120. In addition, Mitigation Measure BIO-7 includes construction BMPs to reduce runoff during construction activities. The project site is not located in an area with risk of flooding, tsunami, or seiche. Implementation of Mitigation Measures USS-1 through USS-4 would ensure the project does not interfere with groundwater management of the existing well. Therefore, impacts related to hydrology and water quality would be less than significant.

Mitigation

Implement Mitigation Measures BIO-7 and USS-1 through USS-4.

XI. LAND USE AND PLANNING

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

Initial Study – Environmental Checklist

Setting

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

Discussion

(a) Physically divide an established community?

Implementation of the project would result in the subdivision of a single 24-acre parcel into four lots and future development of residential units on a previously undeveloped property. The project also includes the construction of a new access road. The project would not result in the removal or blockage of existing public roadways or other circulation paths and would not otherwise include any features that would physically divide an established community; therefore, there would be *no impact*.

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

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

The project would be required to implement measures to mitigate potential impacts associated with Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Utilities and Service Systems; therefore, with mitigation, the project would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating environmental effects and impacts would be *less than significant with mitigation*.

Conclusion

Implementation of the proposed project would not physically divide an established community. Upon implementation of mitigation measures identified throughout this document, the project would be consistent with the County LUO, County COSE, General Plan, South County Area Plan, SLOAPCD CAP, and other applicable documents. Therefore, impacts would be less than significant upon implementation of the identified mitigation measures.

Mitigation

Implement the mitigation measures identified throughout this document.

XII. MINERAL RESOURCES

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

Setting

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

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

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

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

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

The purpose of this combining designation is to protect significant resource extraction and energy production areas identified by the County LUE from encroachment by incompatible land uses that could hinder resource extraction or energy production operations, or land uses that would be adversely affected by extraction or energy production. The project area is not located within an EX or EX1 combining designation.

Discussion

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

(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?*

According to the CDOC CGS Information Warehouse: Mineral Land Classification map, the project site is not in close proximity to an active mine (CDOC 2015). The county does not identify the property as an EX or EX1 zone (County of San Luis Obispo 2021). The project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation. The project is not expected to result in adverse impacts to mineral resources because there are no known mineral resources in the project area; therefore, *no impacts* would occur.

Conclusion

Project activities would not disturb mineral resources because the project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation and there are no known mineral resources in the project area. Therefore, impacts would be less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

XIII. NOISE

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

Setting

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

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

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

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

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

Table 3. Maximum Allowable Exterior Noise Level Standards[1]

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

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

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

The County has established acceptable noise exposure levels for new development through the County Noise Element. A portion of the project is within a transportation noise source (Lopez Drive) and

development within the following distances from the noise source will exceed the County's acceptable exterior noise threshold of 60 dBs for sensitive uses as follows:

- Areas within the 60 dB to 65 dB range - 145 feet from road centerline, and closer;
- Areas within the 65 dB to 70 dB range – approximately 72 feet from road centerline, and closer;
- Areas above the 70 dB level – approximately 35 feet from road centerline, and closer.

Discussion

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

The subject property is located in a rural area and is surrounded by low-density rural residential development in all directions. The nearest off-site residential units are located approximately 100 feet to the south and 280 feet to the north of the project site. Implementation of the proposed project would result in the construction of four new residential units and associated structures on the 24-acre property and construction-related noise would result in a temporary increase in ambient noise levels in the project vicinity. Construction-related noise would be short-term, intermittent, and would only occur during daytime hours in accordance with the County LUO. Construction-related noise would not result in a permanent increase in ambient noise within the project area. The proposed project would be consistent with the land use designation of the parcel and would not result in a significant new source of long-term ambient noise that would conflict with surrounding land uses. Therefore, impacts would be *less than significant*.

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

The project's access improvements do not require demolition, pile driving, or other construction activities that could significantly increase groundborne noise levels within the project vicinity. Future ground disturbance activities associated with residential development may generate limited groundborne noise; however, any groundborne noise generated during construction activity would be short-term, intermittent, and conducted during daylight hours. Operational uses include residential uses and would not result in an increase in long-term groundborne noise. The project is not anticipated to generate excessive groundborne noise; therefore, impacts would be *less than significant*.

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

The project property is not located within an ALUP or within the vicinity of a public or private airstrip; therefore, *no impacts* would occur.

Conclusion

Construction activities would increase ambient noise levels near sensitive receptors but would be intermittent and not significant. Future residential uses would not result in significant noise level increases. The project is not expected to generate excessive groundborne noise during construction or operation. The project property is not located within an ALUP or public or private airstrip and future development of the project would not result in exposure of airport noise to proposed residential land uses. Therefore, with compliance with County noise standards, impacts would be less than significant.

Mitigation

No mitigation is necessary.

XIV. POPULATION AND HOUSING

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

Setting

The County's current Housing Element (2020-2028) is intended to facilitate the provision of needed housing in the context of the General Plan County LUE and related ordinance. It is also intended to meet the requirements of State law. It contains a number of relevant goals, objectives, policies, and implementation programs to ensure the County meets its goals of meeting the housing needs while remaining consistent with State law.

Discussion

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

The project includes subdividing an existing 24-acre parcel into four new lots that would result in the future development of four residential units and accessory structures. Implementation of the project would result in very limited population growth as a result of four new residential units. Marginal population growth is accounted for in the County's General Plan and would not result in substantial unplanned population growth; therefore, impacts would be *less than significant*.

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

The project property is currently undeveloped and does not consist of any exiting residential units that would need to be removed as part of the project. As a subdivision, the project is subject to the County's inclusionary housing policies. Therefore, the project would not displace substantial numbers of people or housing and the project is subject to the County's inclusionary housing policies. *No impacts* would occur.

Conclusion

Implementation of the project would not displace substantial numbers of people or housing and future development of residential units would not result in unplanned population growth. Therefore, impacts related to population growth are less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

XV. PUBLIC SERVICES

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

Setting

Fire protection services in unincorporated San Luis Obispo County are provided by CAL FIRE, which has been under contract with the County to provide full-service fire protection since 1930. Approximately 180 full-time state employees operate the County Fire Department, supplemented by as many as 100 state seasonal fire fighters, 300 County paid-call and reserve fire fighters, and 120 state inmate fire fighters. CAL FIRE responds to emergencies and other requests for assistance, plans for and takes action to prevent emergencies and reduce their impact, coordinates regional emergency response efforts, and provides public education and training in local communities. CAL FIRE has 24 fire stations located throughout the county, and the nearest station to the project site would be CAL FIRE / Pismo Beach Fire Department, located approximately 4.6 miles west of the project site. Emergency response times to the project range from 5 to 10 minutes.

Police protection and emergency services in the unincorporated portions of the county are provided by the San Luis Obispo County Sheriff's Office. The Sheriff's Office Patrol Division responds to calls for service, conducts proactive law enforcement activities, and performs initial investigations of crimes. Patrol personnel are deployed from three stations throughout the county: Coast Station in Los Osos, North Station in Templeton, and South Station in Oceano. The project would be served by the South Station in Oceano, located approximately 4.6 miles southwest of the project site.

San Luis Obispo County has a total of 12 school districts that currently enroll approximately 34,000 students in over 75 schools. The project site is located within the Lucia Mar Unified School District (LMUSD).

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

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

Discussion

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

Fire protection?

Implementation of the proposed project would result in a limited increase in population and new residential units that would result in a slight increase in demand on fire protection services. The project would be served by existing fire protection services and would not require new or expanded facilities in order to serve the project. In addition, the project would be required to pay public facility fees to account for the increased demand on existing fire protection services and facilities. Therefore, impacts would be *less than significant*.

Police protection?

Implementation of the proposed project would result in a marginal increase in population and four new residential units that would result in an increased demand on police protection services. The project would be served by existing police protection services and would not require new or expanded facilities in order to serve the project. The project would be required to pay public facility fees to account for the increased demand on existing police protection services and facilities. Therefore, impacts would be *less than significant*.

Schools?

Implementation of the proposed project would result in limited new residential units that may marginally increase the number of school aged children in the area that would result in an increased demand on the LMUSD. The project would be served by existing LMUSD facilities and would be

required to pay school impact fees fees to account for the potential increased demand on the LMUSD. Therefore, impacts would be *less than significant*.

Parks?

Implementation of the proposed project would result in a marginal increase in population and new residential units that may increase demand on public recreation facilities. No new public recreation facilities would need to be constructed as a result of the proposed project. In addition, the project would be required to pay public facility fees and Quimby fees to account for the potential increased demand on public recreation facilities. Therefore, impacts would be *less than significant*.

Other public facilities?

Implementation of the proposed project would marginally induce population growth through the development of residential units and accessory structures. The project would be required to pay public facility fees to account for an increased demand on public services. Therefore, potential impacts related to the increased demand of public facilities would be *less than significant*.

Conclusion

The project would be required to pay public facility fees to account for an increased demand on public services. Therefore, potential impacts associated with physical impacts associated with provision of public services would be less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

XVI. RECREATION

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

Setting

The *County of San Luis Obispo General Plan Parks and Recreation Element* establishes goals, policies, and implementation measures for the management, renovation, and expansion of existing parks and recreation

facilities and the development of new parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county.

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

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

Discussion

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

Implementation and buildout of the proposed project would result in the development of four new residential units and accessory structures that would result in a marginal increase in population. The marginal increase in population may slightly increase demand on local and regional recreational facilities; however, future development would be required to pay park impact fees (Quimby fees) and public facility fees for maintenance of public recreation facilities. Therefore, impacts would be *less than significant*.

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

The project does not include the construction or expansion of recreation facilities and implementation of the project would not require the construction or expansion of recreation facilities elsewhere; therefore, *no impacts* would occur.

Conclusion

The project would be required to pay public facility fees to account for an increased demand on public recreation facilities. The project does not include the expansion or development of recreation facilities. Therefore, potential impacts associated with recreation facilities would be less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

XVII. TRANSPORTATION

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

Setting

The San Luis Obispo Council of Governments (SLOCOG) holds several key roles in transportation planning within the county. As the Regional Transportation Planning Agency (RTPA), SLOCOG is responsible for conducting a comprehensive, coordinated transportation program; preparing a Regional Transportation Plan (RTP); programming state funds for transportation projects; and administering and allocating transportation development act funds required by state statutes. The 2019 RTP, adopted June 5, 2019, is a long-term blueprint of San Luis Obispo County's transportation system. The plan identifies and analyzes transportation needs of the region and creates a framework for project priorities. SLOCOG represents and works with the County as well as the Cities within the county in facilitating the development of the RTP.

In 2013 SB 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA (as detailed in Section 15064.3[b]). The County of San Luis Obispo has developed a Vehicle Miles Traveled (VMT) Program (Transportation Impact Analysis Guidelines; Rincon, October 2020 & VMT Thresholds Study; GHD, March 2021). The program provides interim operating thresholds and includes a screening tool for evaluating VMT impacts.

The County's Framework for Planning (Inland) includes the *County of San Luis Obispo General Plan Land Use and Circulation Elements*. The framework establishes goals and strategies to meet pedestrian circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum access and

connectivity between land use designations. Due to the remote location of the project site, there are no pedestrian, bicycle, or public transit facilities within 5 miles of the project site.

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

Discussion

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

The subject property is located in a rural area and would not be applicable to existing mixed-land use development or pedestrian accessibility standards of the 2019 RTP and the County Circulation Element. The project would result in four new residential units in the Rural Suburban land use designation. Implementation of the project would result in a limited number of additional vehicle trips to and from the project site during construction and operation of the project. The project would be subject to road improvement fees for maintenance of nearby county roads and transportation facilities and roadways within the City of Arroyo Grande, as applicable. The project would be consistent with applicable circulation system plans; therefore, impacts would be *less than significant*.

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

The County of San Luis Obispo has developed a Vehicle Miles Traveled (VMT) Program (Transportation Impact Analysis Guidelines; Rincon, October 2020 & VMT Thresholds Study; GHD, March 2021). The program provides interim operating thresholds and includes a screening tool for evaluating VMT impacts. Based on the limited number of proposed residential units, the project would generate less than 110 trips per day, which is the suggested screening threshold identified in the State guidance (Technical Advisory on Evaluating Transportation Impacts in CEQA; Office of Planning & Research, December 2018), and would be assumed to be *less than significant*.

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

The project includes the development of new internal driveways and a 50-foot-wide private access road and public utility easement that ends in a cul-de-sac. The proposed access road and public utility easement would be constructed in accordance with existing CALFIRE and County Public Works requirements and does not include any design components that would increase hazards resulting from use. In addition, driveways and any other internal roads would be constructed in accordance with existing State and County requirements; therefore, impacts would be *less than significant*.

(d) *Result in inadequate emergency access?*

Proposed and future construction activities are not anticipated to require traffic controls or road closures. Emergency access would be available during construction activities. In addition, the proposed access road would be constructed according to existing CALFIRE and County Public Works requirements to ensure adequate emergency access. Future residential development would be

required to comply with other CALFIRE requirements, including addressing and driveway access; therefore, impacts would be *less than significant*.

Conclusion

The project would be consistent with the 2019 RTP, 2016 Bikeways Plan, and the County Circulation Element. The project would not generate vehicle trips that would exceed existing VMT thresholds. In addition, the project would be consistent with CAL FIRE and county standards for site access and driveway design; therefore, impacts related to transportation would be less than significant, and no mitigation is required.

Mitigation

No mitigation is necessary.

XVIII. TRIBAL CULTURAL RESOURCES

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

Setting

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

1. Sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the CRHR; or
    b. Included in a local register of historical resources as defined in California 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 California PRC Section 5024.1(c).

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

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

Discussion

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

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

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

As described in Section V, *Cultural Resources*, the project site does not support any known cultural resources. Pursuant to AB 52, tribal consultation opportunity was provided. Referral letters were sent to tribal representatives on August 26, 2019. No tribes requested consultation or provided information regarding significant known tribal cultural resources. Therefore, impacts would be *less than significant*.

Conclusion

The project site does not contain any known tribal or cultural resources. In the event unknown cultural resources are encountered during project implementation, the project would be required to comply with

the County LUO for inadvertent discoveries and the California Health and Safety Code. Therefore, impacts would be less than significant.

Mitigation

No mitigation is necessary.

XIX. UTILITIES AND SERVICE SYSTEMS

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

Setting

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

standards and design criteria for on-site wastewater treatment systems are provided by the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (California OWTS Policy).

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

There are three landfills in San Luis Obispo County: Cold Canyon Landfill, located near the city of San Luis Obispo; Chicago Grade Landfill, located near the community of Templeton; and Paso Robles Landfill, located east of the city of Paso Robles. The project would be serviced by South County Sanitary Services and Cold Canyon Landfill.

Water Supply

A water supply assessment (CHG 2016) was prepared for this project vicinity and included cumulative proposed and potential development within the aquifer, but not the proposed project. This report was peer-reviewed by GSI Water Solutions, Inc. (GSI 2018). The following evaluation is based off the addendum to the original water supply assessment, which was prepared in August 2018 and includes the proposed Evenson subdivision in cumulative analyses (CHG 2018).

Hydrogeography

The project area is located within the South Coast water planning area, within the Guaya Canyon subwatershed of the Arroyo Grande Creek watershed. The southern-most portion of the project site (access road) is located within a non-adjudicated portion of the Santa Maria Groundwater Basin, as defined by the California Department of Water Resources (CA DWR). The remainder of the project site is not located within a CA DWR defined groundwater basin, and instead sits atop a fractured rock aquifer that is approximately 876 acres in size. The project's well field is located outside the Santa Maria Groundwater Basin boundary.

The important geologic formations that underlie the project vicinity include the Corbett Canyon Alluvium, fine to coarse sandstone of Pismo Formation Squire member, and fine-grained silty sandstone of the Pismo Formation Edna member. Pismo Formation outcrops are visible at the surface in many of the hills between Arroyo Grande Creek Valley and Price Canyon and contain the layers that serve as an aquifer for local domestic wells. Field observations by Cleath-Harris Geologists, Inc. confirmed Pismo Formation sandstones are present on the property site (CHG 2016).

The local structure indicates the aquifer beneath the property deepens from north to south. The groundwater bearing sands and gravels tapped by the Sweet Springs MHP wells crop out on the edges of the Hondonada Road valley and at the sand and gravel quarry at the end of the road. The aquifer appears to subcrop beneath the Arroyo Grande Creek alluvium (CHG 2015). Based on the Water Supply Assessments prepared for this project, the extent of the aquifer appears to be limited by a fault boundary to the south, which could restrict the flow of groundwater from the vicinity of Hondonada Road area, and by the Corbett Canyon subwatershed to the west (CHG 2015). The limit of local groundwater to the north of Sweet Springs MHP is created by the aquifer becoming unsaturated because of the formations becoming shallower in the north due to dips in the Pismo formation (CHG 2015).

Discussion

(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?*

The project includes the subdivision of a single 24-acre parcel into four lots for future residential development and the development of an access road and utility easement on a currently undeveloped property. The project would require expanded utility connections both onsite and within the proposed public utility easement including water, wastewater (septic), electricity, natural gas, and telephone connections. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-9, CR-1, GEO-1 through GEO-3, and USS 1-6 to reduce potential environmental impacts during the expansion and installation of utility infrastructure to serve the project. Upon implementation of the identified mitigation measures, impacts would be *less than significant with mitigation*.

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

A *Groundwater Impact and Water Supply Assessment Report (GIWSAR)* was prepared by Cleath-Harris Geologists (CHG) for the proposed subdivision. This report was completed as an addendum to the original GIWSAR of Sweet Springs MHP, Mid-State Properties (Hondonada), and Greenview Estates. These four projects' projected water use were combined to identify the cumulative water level impact in the project area. Groundwater supply was determined by evaluating the buildout water use of the proposed subdivision and future residential developments and other vacant parcels in the project area. There are 177 developed parcels and 11 undeveloped parcels in the project vicinity evaluated by CHG. Two of the parcels are provided water by the City of Arroyo Grande or the Oceano Community Service District and four of the undeveloped parcels are the aforementioned projects (CHG 2018).

Water Balance

A water balance was performed to estimate the annual flux of water within the project area. The water balance initially assesses current basin conditions and then calibrated to depict the change in storage due to regional water level trends (CHG 2018). As shown in Table 4 below, the current water balance for drought years is a 41 acre-feet (AF) deficit and has the potential to recharge 137 AF during average years and the buildout water balance for drought years is a 57 AF deficit and has the potential to recharge 121 AF. Depending how full the aquifers are, only a portion of the available recharge during years of average precipitation may percolate into the aquifer.

Table 4. Water Balance Study for the Project Area

		Current Conditions (AF)		Buildout Conditions (AF)[1]	
		Drought Year	Average Year	Drought Year	Average Year
Inflow	Deep Percolation of Precipitation	0	145	0	145
	Domestic Wastewater Return Flow	51	51	67	67
	Domestic Irrigation Return Flow	8	8	11	11
	Potential Corbett Canyon Recharge	72	105	72	105
	Total Inflow	**131**	**309**	**150**	**328**
Outflow	Domestic Pumping	110	110	145	145
	7 acres of avocados	15	15	15	15
	Corbett Canyon Phreatophyte Uptake[2]				
	Subsurface Outflow	47	47	47	47
	Total Outflow	**172**	**172**	**207**	**207**
Annual Water Balance w/ Corbett Canyon Recharge		**-41**	**137**	**-57**	**121**

Source: CHG (2018)

[1] Buildout conditions are as follows: 189 single-family dwellings on individual parcels in the basin (not including buildout of all parcels), 11 mobile homes and 5 single family dwellings (Sweet Springs Mobile Home Park), 12 single-family dwellings (Hondonada), 21 single-family dwellings (Greenview Estates; the current proposed project includes seven single-family dwellings), and 4 single-family dwellings (Evenson).

[2] 18 AFY Phreatophyte uptake is included in the potential Corbett Canyon Recharge calculation

Inflow components that are assumed to remain the same between the current condition and buildout include deep percolation of precipitation and potential Corbett Canyon alluvial recharge is expected to remain the same at buildout. Outflow components that are assumed to remain the same between the current condition and buildout include avocado irrigation and subsurface outflow are expected to remain constant. Inflow and outflow components that are subject to variation are related to increase in population generated by the proposed projects. According to the GIWSAR, buildout of the four projects would result in approximately 50 new single-family homes and 11 mobile homes, which would result in an additional water demand of 34.5 acre-feet per year (AFY) (CHG 2018). At the time this GIWASR was prepared, the Greenview estates project had proposed the development of 21 single-family homes. Currently, the Greenview Estates project proposes the development of seven single-family homes, which substantially reduces the estimated water demand identified in this GIWSAR.

Well Interference

Well interference occurs when a pumping well causes water level drawdown at an adjacent well (CHG 2018). The GIWSAR evaluated the cumulative water level drawdown at Sweet Springs Mobile Home Park, the Hondonada parcel, Greenview Estates, and the Evenson parcel. The well

interference analysis compares three scenarios of pumping: aggressive pumping (full buildout of all four subdivisions), lower-density pumping (density of Greenview Estates is maintained at 3-4 acres/dwelling, consistent with the other two subdivisions), and reduced pumping (elimination of the Greenview Estate project). Table 5 below shows the well interference levels based on these three scenarios.

Table 5. Estimated Cumulative Projects – 1 year Well Interference at Nearest Known Wells to the Proposed Development

Proposed Development	Scenario 1[1] (feet of interference)	Scenario 2[2] (feet of interference)	Scenario 3[3] (feet of interference)
Sweet Springs MHP Well	3.3	2.6	1.7
Hondonada Well	4.1	3.3	2.3
Greenview Estates Well	4.7	3.6	--
Evenson Parcel	2.0	1.6	1.0

Source: CHG (2018:Table 6)

[1] Anticipated Interference at proposed buildout for all developments

[2] Anticipated Interference if study area housing density is maintained at 3-4 acres/dwelling

[3] Anticipated Interference if only Sweet Springs MHP and Mid-State Properties (Hondonada) are completed.

Under the full buildout scenario in Scenario 1, drawdown at wells nearest to the three subdivisions one-year post buildout would range from 3-5 feet, which is unlikely to cause significant impacts to the wells (GSI 2018). The well interference analysis indicates that the maximum cumulative one-year drawdown at nearby wells attributable to the combined project pumping will be less than five feet. This amount of drawdown is not considered significant enough to pose any risk to operations of nearby wells (GSI 2018).

Based on the limited information about the Corbett Canyon Watershed, the Pismo Formation, proposed amount of water to be used and the water source, there is concern about the long-term sustainability of the aquifer due to the potential number of parcels that could be created and evolving trend that seems to show that more dry years than wet years can be expected in the future. Water conservation measures and a drought management plan are included as Mitigation Measures USS-1 through USS-4 for the project. With implementation of these mitigation measures, impacts to well interference is expected to be *less than significant with mitigation*.

(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?

Wastewater services would be supplied by a private sewer system and would not require connections to a wastewater treatment provider; therefore, *no impacts* would occur.

(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?

Solid waste, recycling, and green waste would be serviced by South County Sanitary Services and would be disposed of at Cold Canyon Landfill. Cold Canyon Landfill has an expected close date of

2040 (CalRecyle 2015). Implementation of the proposed project would result in an increase in solid waste during construction and operation. Construction waste would be similar to other development projects within the county and would result in a temporary increase in solid waste. Cold Canyon landfill has enough permitted capacity to accommodate the temporary increase in construction-related waste. According to the Estimated Solid Waste Generation Rates by the California Department of Resources Recycling and Recovery (CalRecycle), the project may generate approximately 39.2 pounds (lbs) of waste per day at full buildout, as shown in **Table 6** below.

Table 6. Estimated Solid Waste Generation Rates for the Project

Waste Generation Source	Generation Rate	Unit of Measure	Proposed Development	Total
Single-family	9.8	lb/dwelling unit/day	4 units	39.2 lbs
Total				**39.2 lbs**

Source: CalRecycle Estimated Solid Waste Generation Rates, 2019

Implementation of the project would result in a long-term increase in operational solid waste generation; however, Cold Canyon Landfill has adequate available capacity to support the increase of solid waste; therefore, impacts would be *less than significant*.

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

The project would be serviced by South County Sanitary Services and Cold Canyon Landfill, which are fully compliant with existing local and state regulations related to disposal of solid waste. The project is not expected to generate solid waste in excess of state or county regulations for solid waste; therefore, impacts would be *less than significant*.

Conclusion

The project would require the expansion and installation of utility infrastructure to support proposed development. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-9, CR-1, GEO-1 through GEO-3, and USS 1-6 to reduce potential environmental impacts during expansion and installation of utility infrastructure for the proposed projects. Upon Implementation of Mitigation Measures USS-1 through USS-4, impacts to water quantity and quality would be less than significant. The project would use a private sewer system and would not need to connect to a wastewater treatment provider. The project would not generate solid waste in exceedance of state or county regulations. Therefore, upon implementation of the identified mitigation measures, impacts would be less than significant.

Mitigation

USS-1 **Water Conservation – Education Program**. To reduce water usage, prior to approval of subdivision improvement plans/recordation of the final map**,** the Applicant shall develop and implement a Water Conservation Education Program (WCEP) for all project-related personnel, including residents and commercial operators/employees. The WCEP shall be prepared by an individual knowledgeable on current conservation methods for interior and exterior water usage as it relates all project development, as well as any applicable County regulations and existing building codes on conserving water. The Program shall focus on a)

all consumer-controlled water uses (e.g., landscaping, washing {e.g. dishes, clothes}, showers, etc.); b) project design elements that would make water conservation easier to implement; and c) the creation of 'good practices' user documents for daily use and during drought conditions; furthermore the WCEP shall describe the most effective means to best disseminate this information to target audience(s) on an ongoing basis.

Prior to approval of subdivision improvement plans, the Applicant shall submit for County review and approval the Water Conservation Education Program (WCEP), which will include 'good practices' user documents for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. **Prior to and/or during construction/ improvements**, as applicable, all program-approved water conservation construction practices shall be administered. **Prior to final inspection/ occupancy of individual lot construction permits**, the County will verify installation of any WCEP-approved design features. Furthermore, the Applicant shall verify that the 'good practices' user documents are complete and are made available to the end users.

USS-2 **Water Conservation – Limit Turf Planting**. To limit water usage, the Applicant shall limit the use of turf for landscaping and maximize turf maintenance elements that reduce water consumption. Turf shall be limited to no more than 100 square-feet per single-family residence, and no more than 500 square-feet total in common areas. The following measures shall be shown on applicable construction drawings and applied to the proposed turf areas:

a. To maximize drought-tolerance and minimize water usage, warm season grasses (excludes Bermuda grass) such as buffalo grass, shall be used;
b. To minimize establishment of shallow roots, the following shall be avoided on turf areas, and provided in all applicable documents (e.g., educational brochure, CC&Rs, landscape plans): close mowing, overwatering, excessive fertilization, soil compaction, and accumulation of thatch;
c. Watering times shall be programmed for longer and less frequently rather than for short periods and more frequently; length of time and delivery rate shall be monitored to avoid runoff to surrounding areas.

Prior to issuance of a construction permit, the Applicant shall show these measures on all applicable construction drawings and landscape plans. Prior to final inspection/occupancy of individual lot construction permits, the County will verify installation of any approved irrigation design features. Furthermore, the Applicant shall verify that the approved irrigation system parameters meet the intent of this measure and have been tested by a qualified expert. The Applicant understands that the approved irrigation system and water scheduling will be kept in good working condition as long as the turf remains.

USS-3 **Water Conservation – Landscaping.** To reduce water use, the applicants of individual residences that install landscaping shall install landscaping that will have low-water requirements and be drought-tolerant. **At the time of application for construction permits,** the applicant shall provide, at a minimum, a landscape plan that includes the following:

a. all common area and individual residential irrigation shall employ low water use techniques (e.g., drip irrigation);
b. individual residential turf shall not exceed 20 percent of landscaped area, or 100-square-feet, whichever is less, with remaining landscaping being drought-tolerant and having low water requirements (e.g. use of native vegetation, etc.).

USS-4 **Water Conservation – Drought Water Management Program**. To reduce water consumption during droughts, a master "Drought Water Management Program" (Program) shall be prepared and implemented by the Applicant, **prior to recordation of the final map**. The Program shall provide guidelines on how all future uses will be managed during "severe" drought (including landscaping and indoor uses). These measures would go into effect during periods of "severe" drought, as defined in the Program. This Program shall include, but is not necessarily limited to the following, or other similar measures as approved by the County:

a. the definition of a "severe" drought year (as defined by NOAA's Palmer Drought Severity method or other similarly recognized methodology);
b. identification of general measures available to reduce indoor water usage for future development (to be refined as needed for each use approved);
c. identification of specific measures to be applied for landscape watering;
d. determination of appropriate early triggers to determine when "severe" drought conditions exist and process for initiating additional water conservation measures for tract and future development.

Once it is determined that a "severe" drought condition exists, the Program's approved restricted (drought) water usage measures shall remain in effect until it is shown satisfactorily to the County that the "severe" drought condition no longer exists.

Prior to recordation of the final map, the Applicant shall submit for County review and approval the Drought Water Management Program (DWMP), which will include water reduction guidelines for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. **Prior to and/or during construction**, as applicable, all Program-approved water reducing construction practices shall be administered. **Prior to final inspection/occupancy of individual lot construction permits**, the County will verify installation of any DWMP-approved design features. Furthermore, the Applicant shall verify that the 'water reduction guidelines during drought conditions are complete and are made available to the end users. Furthermore, the Applicant understands that the approved Program will be administered for the life of the project.

XX. WILDFIRE

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

Setting

In central California, the fire season usually extends from roughly May through October; however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. FHSZs are defined by CAL FIRE based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the county have been designated as "Very High," "High," or "Moderate." In San Luis Obispo County, most of the area that has been designated as a "Very High Fire Hazard Severity Zone" and is located in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San Luis Obispo County. The project would be located within the State Responsibility Area in a high FHSZ (CAL FIRE 2021). Emergency response to the project site is approximately 5-10 minutes (County of San Luis Obispo 2021).

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

- Identifies the departments and agencies designated to perform response and recovery activities and specifies tasks they must accomplish;

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

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

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

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

Discussion

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

The project includes the subdivision of a single 24-acre parcel into four new lots and the construction of a new access road and public utility easement. Construction activities associated with the proposed access road and public utility easement and future residential development may include temporary traffic controls along nearby roadways; however, the project would not require road closures and emergency access would be available during construction activities. The proposed access road would be 20-feet wide with 2-foot shoulders and would terminate in a cul-de-sac. The proposed access road would be fully compliant with County Public Works and CAL FIRE requirements. Additionally, future driveways, gates, addressing, and landscaping, would be required to comply with CALFIRE recommendations and the California Fire Code to allow for emergency access and response to the site; therefore, impacts would be *less than significant*.

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

The subject property is located in a high FHSZ and supports relatively flat to steeply sloping topography and the project vicinity has an average wind speed of 7.1 to 9.5 miles per hour (mph) annually (WeatherSpark 2021). Implementation of the project has the potential to place buildings in an area with increased risk for wildfire. The project would be required to comply with CAL FIRE

recommendations for roads, access roads, driveways, gates, addressing, landscaping, and adherence to the California Fire Code. Implementation of the CAL FIRE recommendations would ensure future development would not expose people or structures to unnecessary risk due to wildfire; therefore, impacts would be *less than significant*.

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

The project includes the construction of a 50-foot-wide access road and public utility easement, which would be fully compliant with County Public Works and CAL FIRE recommendations and the California Fire Code to ensure installation would not result in increased risk of wildfire. The project also includes future development of four residential units, accessory structures, and other site improvements. Future residential development would be required to comply with CALFIRE recommendations for internal roads, driveways, gates, addressing, landscaping, and adherence to the California Fire Code. Additionally, future development would be required to comply with the CBC to protect new development; therefore, impacts would be *less than significant*.

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

The westernmost portion of the project site is located within a 100-year flood zone; however, the majority of the subject parcel has a low potential for flooding to occur. The risk of landslide at the project is low to moderate. The project site is located within a high fire hazard severity zone that would increase risk for potential post-fire landslide risks. Future development would be required to comply with the most recent California Building Code (CBC), the California Fire Code, and other CAL FIRE recommendations, which would minimize potential risks associated with post-fire hazards; therefore, impacts would be *less than significant*.

Conclusion

Implementation of the proposed project would result in new development within a high FHSZ. The project would be required to comply with CAL FIRE recommendations and County and CBC regulations for development within a high FHSZ. Based on required compliance with existing regulations, impacts would be less than significant, and no mitigation is necessary.

Mitigation

No mitigation is necessary.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed in each resource section above, upon implementation of identified mitigation measures, the proposed project would not result in significant impacts to biological or cultural resources and would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, reduce the number or restrict the range of a rare or endangered plant or wildlife, or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be *less than significant with mitigation incorporated.*

(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Aesthetics

The discussion of cumulative impacts in Section I, Aesthetics, relates to the potential for the project to contribute to an aggregate change in visual quality from the surrounding public viewing areas, taking into consideration existing as well as proposed development. As described in the resource section, the proposed project may be viewed from Corbett Canyon Road, but future residential development would be consistent in terms of scale and intensity with surrounding uses, and therefore would be less than significant. Therefore, the contribution of the subject project to potential impacts to aesthetics are considered less than cumulatively considerable.

Agricultural Resources

The analysis conducted in Section II, Agriculture and Forestry Resources, determines that the project does not have the potential to convert agricultural land to non-agricultural use. Additionally, the project would result in a significant conversion of forest land to non-forest use. Therefore, impacts would be less than cumulatively considerable.

Air Quality

The analysis provided in Section III, Air Quality, concludes that the project's potential construction-related and operational emissions will fall below SLOAPCD thresholds of significance for both project-related and cumulative impacts, except for ROG+ NO_x and DPM, which can be less than significant with implementation of Mitigation Measures AQ-1 and AQ-2. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to air quality are considered less than cumulatively considerable.

Biological Resources

The analysis provided in Section IV, Biological Resources, concludes that the project would have a less-than-significant impact with implementation of the identified mitigation measures for special-status wildlife species and their habitats, and avoidance and replacement of potentially impacted native trees. With implementation of Mitigation Measures BIO-1 through BIO-9, potential impacts to biological resources would be less than significant. All surrounding proposed development projects would undergo evaluation for potential to impact biological resources. Based on the mitigation measures identified to reduce potential project impacts and discretionary review of surrounding projects, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with biological resources would be less than cumulatively considerable.

Cultural Resources

The analysis provided in Section V, Cultural Resources, concludes that the project site is located within an Archaeologically Sensitive Area. There are archaeological structures onsite that would be avoided through Mitigation Measure CR-1. All surrounding proposed development projects would undergo evaluation for potential to impact cultural resources. Based on ordinance and code requirements identified to reduce potential project impacts and discretionary review of surrounding

projects, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with cultural resources would be less than cumulatively considerable.

Energy Use

The analysis provided in Section VI, Energy, concludes that the projects energy use would not result in unnecessary or wasteful energy use and would not conflict with applicable energy efficiency standards. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to energy are considered less than cumulatively considerable.

Greenhouse Gas Emission.

The analysis provided in Section VIII, Greenhouse Gas Emissions, concludes that the project's potential construction-related and operational emissions will fall below SLOAPCD thresholds of significance for both project-related and cumulative impacts upon implementation of Mitigation Measure AQ-1 to reduce diesel idling during project construction. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to GHG emissions are considered less than cumulatively considerable.

Hydrology/Water Demand

As discussed in Section X, Hydrology and Water Quality, upon implementation of Mitigation Measures USS-1 through USS-4, there is sufficient water supply in the existing well to support the project. Additionally, compliance with Mitigation Measure BIO-7, existing regulations, and required plans would adequately reduce potential impacts associated with hydrology and water quality to be less than significant. All surrounding proposed development projects would undergo evaluation for potential to impact hydrological resources. Based on the mitigation measures identified to reduce potential project impacts and discretionary review of surrounding projects, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with hydrology and water quality resources would be less than cumulatively considerable.

Noise

As discussed in Section XIII, Noise, the project would not generate significant increases in ambient noise levels. Future projects with potential to generate noise above County standards or noise that would adversely affect surrounding sensitive receptors would be required to implement measures to reduce associated impacts. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential noise impacts is considered less than cumulatively considerable.

Population and Housing

Based on the discussion in Section XIV, Population and Housing, the most recent projection of regional growth for San Luis Obispo County is the 2050 Regional Growth Forecast (RGF) for San Luis Obispo County prepared and adopted by SLOCOG in 2017. Using the Medium Scenario, the total county population, housing, and employment for both incorporated and unincorporated areas is projected to increase at an average annual rate of 0.50% per year. Between 2015 and 2050, the County's population is projected to increase by 44,000, or about 1,260 residents per year. Within the

unincorporated area, the population is expected to increase by about 19,500 residents, or about 557 per year. Employment is expected to increase by about 6,441, or about 184 per year.

The proposed project is not expected to induce substantial population growth. The project would be limited to four new residential units. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to impacts related to housing and population is considered less than cumulatively considerable.

Public Services

Based on the discussion in Section XV, Public Services, the project and surrounding reasonably foreseeable future development would be subject to adopted public facility (County) and school (California Government Code Section 65995 et seq.) fee programs to offset impacts to public services. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential public services impacts would be less than cumulatively considerable.

Recreation

Based on the discussion in Section XVI, Recreation, the project would not substantially induce population growth that could result in the need for new or expanded recreational facilities or cause deterioration of existing ones. The project would be subject to adopted public facility fee programs to offset impacts on public recreational facilities. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential recreation impacts would be less than cumulatively considerable.

Transportation

Based on the analysis in Section XVII, Transportation, the project is not expected to significantly increase peak hour trips to and from the project site. The project would generate fewer than 110 daily trips. Additionally, the project and any other reasonably foreseeable development projects in the area would be subject to Road Improvement fees. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential transportation impacts would be less than cumulatively considerable.

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

Environmental impacts that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. In addition, implementation of Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-9, GEO-1 through GEO-3, and USS 1-4 identified in the resource sections above would reduce potential adverse effects on human beings to less than significant; therefore, impacts would be less than significant with mitigation.

Conclusion

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

Exhibit A - Initial Study References and Agency Contacts

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

Contacted	Agency	Response
☒	County Public Works Department	**In File****
☒	County Environmental Health Services	**In File****
☒	County Agricultural Commissioner's Office	**In File****
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☒	Air Pollution Control District	**In File****
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☐	CA Coastal Commission	**Not Applicable**
☐	CA Department of Fish and Wildlife	**In File****
☒	CA Department of Forestry (Cal Fire)	**Not Applicable**
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☒	Other City of Arroyo Grande	**None**
☐	Other _____	**In File****

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

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

☒ Project File for the Subject Application

County Documents

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

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

Other Documents

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

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

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