Initial Study – Environmental Checklist

Crisp/Greenview Estates Tract Map; SUB2021-00013/TR 3073 ED22-129

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 Cumming		12/29/2022
Prepared by (Print)	Signature		Date
Eric Hughes, Principal Environmental Specialist		For Xzandrea Fowler, Environmental Coordinator	12/29/2022
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 Greenview Estates (Applicant) for a Tentative Tract Map (SUB2021-00013/TR 3073) to subdivide a 36.71-acre parcel into seven parcels, ranging in size from 5 acres to 5.6 acres for the sale and/or development of each proposed parcel. The project includes the extension of Stagecoach Road and El Sueno Way for access to the project site. Other proposed site improvements include the installation of retention basins, bioswales, and other low-impact design treatments. The project includes a request for an exception to Title 21 (Real Property Division Ordinance) to allow the minimum lot frontage length-to-width ratio to be less than 60 feet wide and 80 feet deep. The project site is located in the Residential Suburban (RS) land use category, to the north of Stagecoach Road and El Sueno Way, 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 36.71-acre parcel into seven individual residential lots located across the entire project site. Development of individual residences within building envelopes is not proposed at this time and would be constructed later by individual homeowners or by a developer. A new 50-foot-wide access road and utility easement from Stagecoach Road and El Sueno Way would be developed according to County Public Works and CALFIRE standards as part of the proposed subdivision. Implementation of the road and future residential development would require the removal of up to 81 oak trees. The project includes Open Space Easements on individual lots that would protect existing oak trees and provide an area for revegetation following construction activities.

Primary access to the individual lots would be from Stagecoach Road, which would be extended through the project site.

Site Improvements

The project would require private utility connections to serve the lots. New connections would be placed within access and utility easements within the road. Water would be provided to the individual lots through private water connections. The existing onsite well would serve four parcels, and a new well would be drilled to serve the remaining three parcels. Sewage would be handled through proposed individual septic systems

on each lot. Future development would include construction of individual residences on the building pads/envelopes. Septic tanks, leach fields, and water storage tanks would also be installed on each lot, outside of the building envelopes based on optimal siting for percolation and flow. Individual residential construction would result in additional non-tree vegetation removal to create wildfire defensible space.

Background:

The Applicant conducted three pre-application meetings with County staff in 2013 and 2014 before submitting a tentative map in November 2014 (SUB2014-00030). The original map design consisted of a 36-parcel cluster subdivision with minimum parcel sizes of 10,000 square feet and a dedication of 50% of the site as open space. Due to the number of parcels, a community water system was proposed along with a community sewer. During the initial application review by County staff, it was discovered that Country Oak Way, the proposed secondary access road at the time, was not a public road easement and therefore could not be used for secondary access. Without secondary access, County Fire/CAL FIRE determined the minimum parcel size would need to be one acre or more.

The project was redesigned in 2016 with a reduced number of parcels (21) and a maximum dead-end road length of 1,320 feet, which at the time was the maximum dead-end road length allowed by the Fire Code/CAL FIRE. Shortly after the resubmitted map, the County, based on concerns from neighboring property owners, requested the Applicant, along with the applicants for the nearby Hondonada and Evenson subdivisions, participate in a cumulative hydrogeological analysis to assess the water supply and determine the cumulative water level impact of the proposed subdivisions on the adjacent properties. While the cumulative hydrogeological analysis was being prepared, the State Water Resources Control Board adopted new standards related to the minimum parcel size for new parcels being served by septic systems.

The new State Water Resources Control Board standards required that the project site have a 2-acre minimum parcel size. Based on this, the project was redesigned in 2019 and reduced the number of parcels to 14. During the revised application review by County staff, it was determined that the subdivision design no longer met Fire Code requirements. Specifically, the proposed access road exceeded the standard for maximum dead-end road lengths, and the proposed parcel sizes triggered the secondary access requirement, which applies when parcels are proposed under 5 acres in size.

The project was redesigned a final time in 2020 with 7 parcels ranging in size from 5.03 to 5.58 acres. This is the proposed subdivision configuration analyzed in this document.

ASSESSOR PARCEL NUMBER(S): 047-181-001

Latitude: 35º 08' 45.90" N **Longitude:** 120º 33' 10.13" W **SUPERVISORIAL DISTRICT #** 3

B. Existing Setting

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

Land Use Category: Residential Suburban

Combining Designation: None

Parcel Size: 36.71acres

Topography: rolling hills

Vegetation: Grasses Coastal scrub, Oak woodland, ,

Existing Uses: Undeveloped,

Initial Study – Environmental Checklist

Surrounding Land Use Categories and Uses:

North:	Residential Suburban; single-family residence(s) residential	***East:***	Residential Suburban; single-family residence(s) Arroyo Grande Creek
South:	Residential Suburban; single-family residence(s) residential	***West:***	Residential Suburban; residential undeveloped

Baseline Conditions

The project site is located at the intersection of Stagecoach Road and El Sueno Way, approximately 1 mile northeast of the City of Arroyo Grande on the west side of Lopez Drive and the east side of Corbett Canyon Road. The project site consists of a single legal parcel, approximately 36.71 acres in size, which is currently undeveloped and has historically been vacant. Topography of the project site is characterized by rolling hills with an average slope of 12%, and is vegetated primarily by annual grasslands, coastal scrub, and coast live oak woodland. 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 east by smaller Residential Suburban parcels, one to five acres in size, with very low-density residential development; to the south by small and large Residential Suburban parcels, two to 20 acres in size, with low-density residential development; and to the west by a large, undeveloped parcel, 24 acres in size. There is a current application for to subdivide the 24-acre lot to the west into four smaller parcels.

The project site would be accessed by a proposed access road from the intersection of Stagecoach Road and El Sueno Way.

Initial Study – Environmental Checklist

Figure 1. Project Location Map

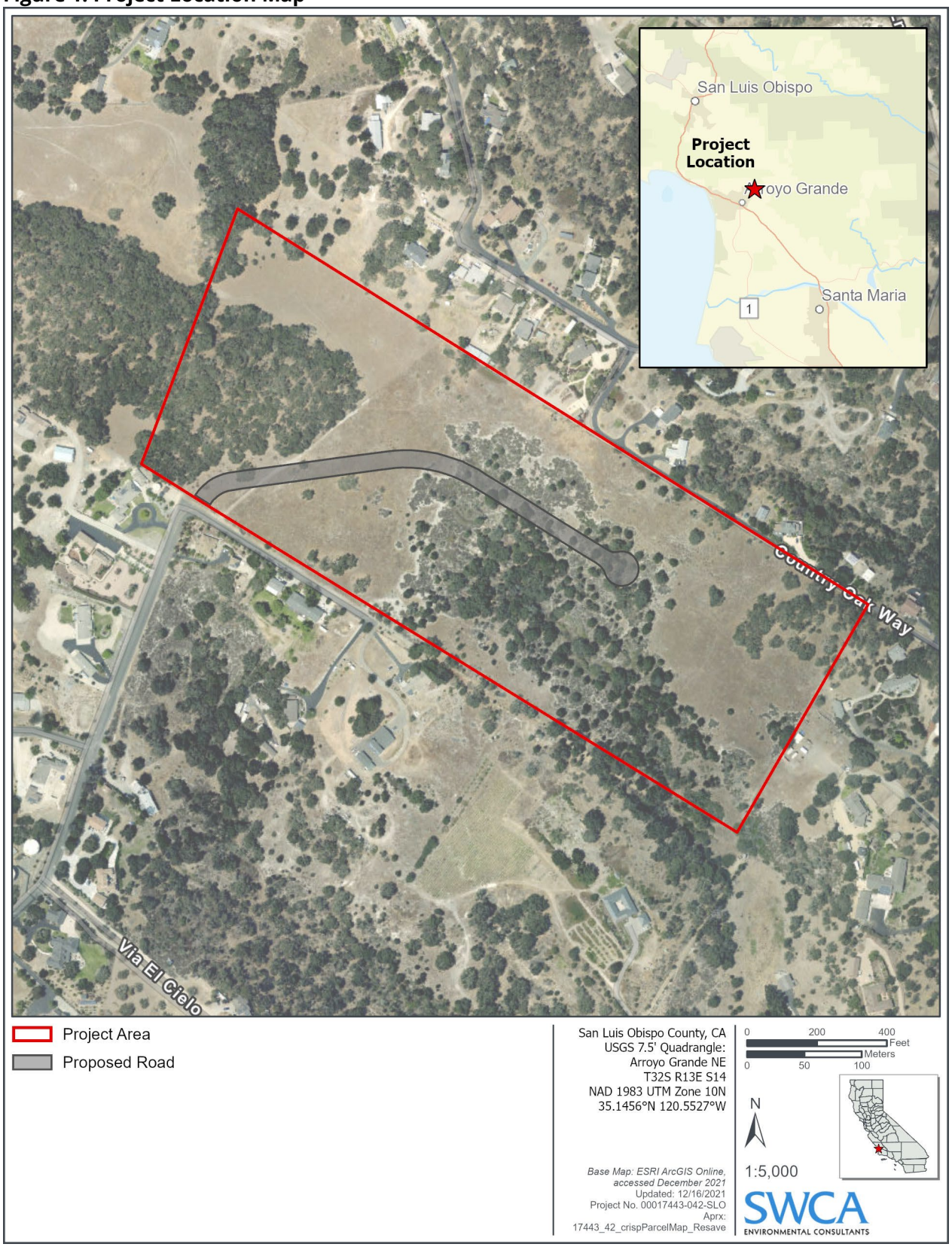
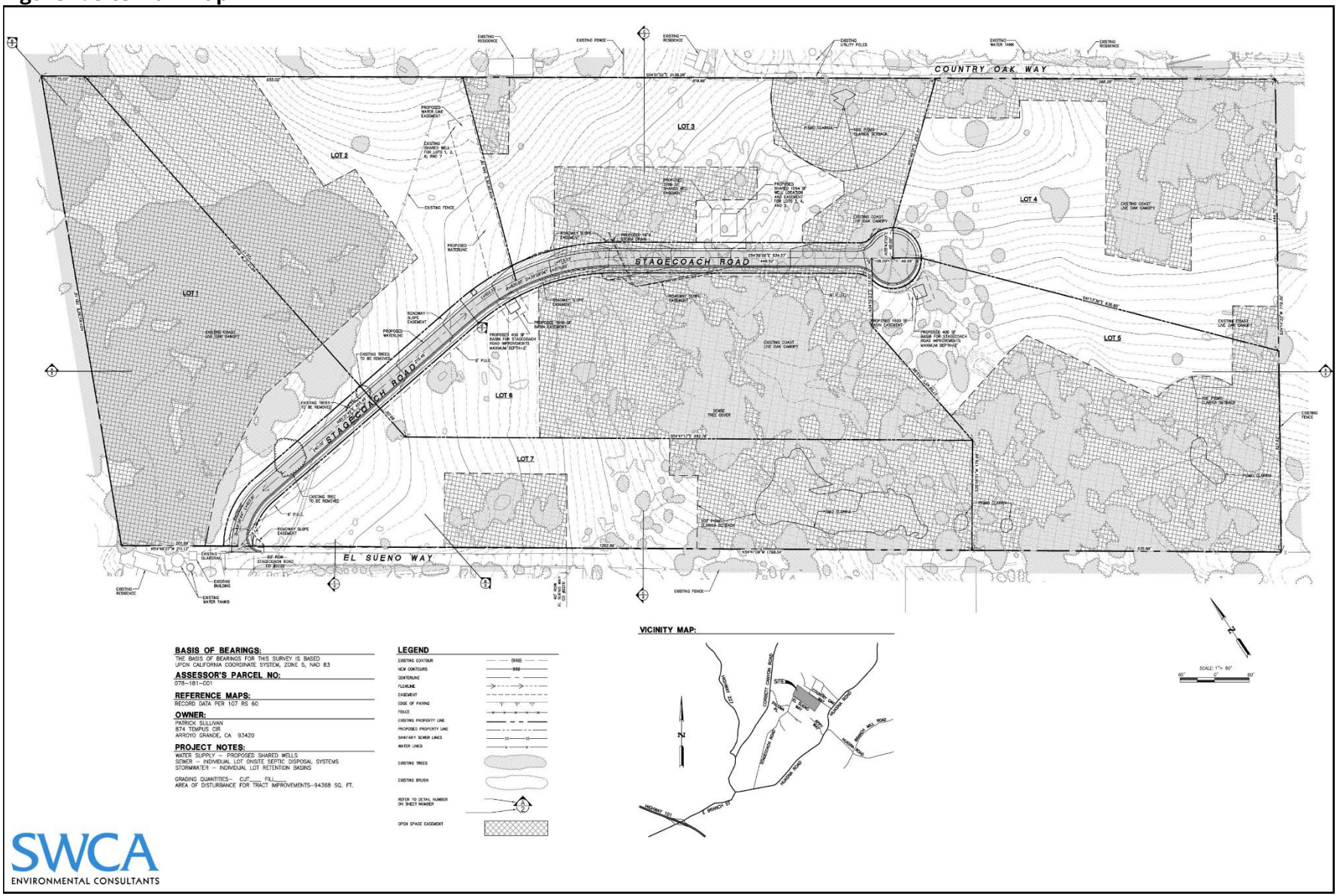


Figure 2. Site Plan Map



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 US Highway 101 (U.S. 101), State Route 46 (SR 46), portions of State Route 41 (SR 41), State Route 1 (SR 1), and Lake Nacimiento Drive. The project site is located approximately 2.3 miles east of U.S. 101.

County Conservation and Open Space Element

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

- **Goal VR 1:** The natural and agricultural landscape will continue to be the dominant view in rural parts of the county.
- **Goal VR 2:** The natural and historic character and identity of rural areas will be preserved.
- **Goal VR 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 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 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 rolling topography and is visible from Stagecoach Road, El Sueno Way, and Country Oak Way. Existing vegetation consists of grasses, oak woodland, and coastal scrub. The site is currently undeveloped and surrounding development includes scattered rural 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 an 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 upon 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 scenic vista. Therefore, the project would not adversely affect a scenic vista and 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 by Stagecoach Road, which is located to the north of the project site. The nearest state highway is U.S. 101, which is an eligible state scenic highway, located approximately 2.3 miles southwest 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 impact* 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 36.71-acre parcel is located in a rural area approximately 1 mile northeast of the city of Arroyo Grande to the north of Stagecoach Road, to the east of Corbett Canyon Road, and to the west of Lopez Drive. The parcel is comprised of rolling hills across the project parcel. The proposed project includes construction of a new access road and subdividing the existing parcel into seven lots for future residential development. Construction of the project may result in construction-related views from Stagecoach Road, El Sueno Way, Country Oak Way, and surrounding land uses. Any views of construction activities would be temporary in nature and would not result in long-term adverse views from surrounding roadways or land uses; therefore, impacts related to adverse construction-related views would be *less than significant*.

The project would result in the implementation of a new paved access road from the intersection of El Sueno Way and Stagecoach Road and the future development of seven residential units, accessory structures, and other site improvements. The project would result in the removal of oak trees for installation of the road and during future residential development. However, the project includes a revegetation plan that would ensure removed trees are replanted within proposed open space easements onsite to avoid degrading existing views through the removal of trees onsite. 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 requires the use of lighting onsite. 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 onsite would be required to comply with the County's 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. Impacts related to visual impacts would be consistent with surrounding development and would result in less than significant impacts.

Mitigation

No mitigation is necessary.

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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 Farmland Mapping and Monitoring Program (FMMP) (DOC 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 Agricultural Preserve Area not 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 (USDA 2021):

> Gaviota fine sandy loam (15 - 50 % slope). This moderately to steeply sloping, shallow coarse loamy soil is considered very poorly drained. The soil has high erodibility and low shrink-swell characteristics, as well as having 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 Section 12220(g) as land that can support 10 percent 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 Public Resources Code Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forest land, 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 as Farmland of Statewide Importance by the FMMP. The project area is primarily classified as Grazing Land, with small areas of Vacant and Disturbed Land (DOC 2016). The project area does not support grazing or other agricultural activities and would not result in disturbance to Prime Farmland, Unique Farmland, or as Farmland of Statewide Importance by the FMMP; therefore*, no impact* would occur.

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

The project property located within the Edna Valley Agricultural Preserve area and the Arroyo Grande Valley Agricultural Preserve Area; however, it is not designated for Agricultural uses and is not subject to a Williamson Act contract. The project site does not support agricultural activities and implementation of the project would not result in disturbance to land subject to a Williamson Act contract or zoned for agricultural uses; therefore*, no impact* 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 impact* would occur.

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

The project site supports 15 acres of oak woodland habitat and would result in the removal of 81 oak trees for site improvements and future residential development. The project includes a

revegetation plan which proposes to replace removed oak trees at a 4:1 ratio, which results in a mitigation obligation of 324,000 square feet (7.4 acres) of oak woodland habitat. The project would protect 566,280 square feet of oak woodland habitat within open space easements onsite (Althouse and Meade 2021c). Therefore, the project would not result in the conversion of forest land and potential impacts would be *less than significant*.

(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 Agriculture zoned land under a Williamson Act contract approximately 0.2 mile southeast of the project site, across Lopez Drive and Arroyo Grande Creek. 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 forest land to non-forest use and *no impact* would occur.

Conclusion

The project site does not contain Prime Farmland, land currently zoned for agricultural uses or under a Williamson Act contract, or timberland and therefore would not result in impacts to these resource areas. Therefore, impacts to forestland would be less than significant.

Mitigation

No mitigation is necessary.

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III. AIR QUALITY

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

Setting

San Luis Obispo County Clean Air Plan

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

SLOAPCD Criteria Pollutant Thresholds

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

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 SLOAPCD 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 of one mile in length carrying 6.0 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. Residences are located adjacent to the project site to the north, south and east.

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 San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined

in the CAP (SLOAPCD 2012). Adopted land use planning strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The project 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 construction of seven residential units, which is not a significant increase that would 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 County's 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 (reactive organic gases and nitrogen oxides) 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.

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, 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 seven 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 located approximately 50 feet to the south and 50 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. Future 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 Naturally Occurring Asbestos (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 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 Measure AQ-1 and AQ-2 would reduce impacts of construction emissions near sensitive receptor locations. Therefore, with implementation of Mitigation Measure 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 ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);

c. Use diesel construction equipment meeting ARB'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 ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;

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

f. All on and off-road diesel equipment shall not idle for more than 5 minutes. 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 13 CCR 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.

c. 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. Reduce the amount of disturbed area where possible.

b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour (mph). Reclaimed (non-potable) water should 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, designate access points and require all employees, subcontractors, and others to use them. Install and operate a "track-out prevention device" where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked-out soils, the track-out prevention device may need to be modified.

k. Sweep streets 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 should 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?	☐	☒	☐	☐

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, 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 of 1973 (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act of 1984 (CESA) ensures legal protection for plants listed as rare or endangered, and wildlife species formally listed as endangered or threatened, and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the 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) 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.

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 labata*), 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 *Biological Report for Greenview Estates SUB2019-00093/TR3073 APN 047-181-001* (Althouse and Meade, Inc. [Althouse and Meade] 2021a), the *Spring Botanical Survey Report for Greenview Estates, SUB 2019-00093/TR3073, APN 047-181-001, San Luis Obispo County, California* (Althouse and Meade 2021b), the *Oak Woodland Mitigation Plan for Greenview Estates SUB2019-00093/TR3073 APN 047-181-001* (Althouse and Meade 2021c), and the *Delineation of Potentially Jurisdictional Wetlands and Waters for Greenview Estates SUB2019-00093/TR 3073 APN 047-181-001* (Althouse and Meade 2021d).

Existing Conditions

The subject property is currently undeveloped with the exception of an unpaved ranch road that bisects the property in a southwest to northeast direction and a barb-wired fence that parallels the road. There is evidence of historical grazing at the site; however, the site is currently vacant. Topography includes rolling hills across the property and a downward slope towards the eastern portion of the property. Habitat types at the project site include annual grassland, coast live oak woodland (*Quercus agrifloia*), and coastal scrub. There is approximately 15 acres of coast live oak woodland scattered throughout the subject property. The project includes an Oak Restoration, Revegetation, and Monitoring Plan (RRM) to replace oaks according to state and local requirements (Althouse and Meade 2021c).

Potential Wetlands and Jurisdictional Features

Potentially jurisdictional wetlands and waters may be present on the project site. There is an ephemeral drainage, made up of the connected drainages, that occurs in the central and southeastern portions of the site and extends approximately 2,185 linear feet. There is wetland vegetation present in some portions of the drainage, including pacific rush (*Juncus effusus*), umbrella sedge (*Cyperus eragrotis*), and marsh cudweed (*Gnaphalium palustre*). The drainage also supports mature coast live oak trees (Althouse and Meade 2021a). A formal wetland delineation was conducted on April 29, 2021 according to United States Army Corps of Engineers (USACE) and State Water Resources Control Board (SWRCB) requirements. Based on the results of wetland delineation, the site consists of 0.21 acre of wetland habitat that meets the definition of wetland by the SWRCB. The ephemeral drainage is dry most of the year and conveys stormwater from the northwest to the southeast corner of the project site (Althouse and Meade 2021d).

Critical Habitat

The project site is not located within or adjacent to designated critical habitat. Arroyo Grande Creek, located approximately 0.2 mile east of the project site, provides USFWS designated steelhead habitat. However, drainages at the project site do not provide direct connection to Arroyo Grande Creek (Althouse and Meade 2021a).

Special-Status Plants

Desktop-level review conducted for the project site identified 95 special-status plant species within the project region. Of the 95 plant species, the following 12 special-status plants were identified as having the potential to occur onsite based on suitable soil and other habitat conditions (Althouse and Meade 2021a):

- Hoover's bent grass (*Agrotis hooveri*)
- Santa Margarita manzanita (*Arctostaphylos pilosula*)
- San Luis Mariposa lily (*Calochortus obispoensis*)
- San Luis Obispo owl's clover (*Castilleja densiflora var. obispoensis*)
- Straight-awned spineflower (*Chorizanthe rectispina*)
- Pismo Clarkia (*Clarkia speciosa ssp. immaculata*)
- paniculate tarplant (*Deinandra paniculata*)
- mesa horkelia (*Horkelia cuneata var. puberula*)
- San Luis Obispo County lupine (*Lupinus ludovicianus*)
- California spineflower (*Mucronea californica*)
- Michael's rein orchid (*Piperia michaelii*)
- chaparral ragwort (*Senecio aphanactis*)

Botanical surveys were conducted for the project site on April 29 and May 26, 2021. In addition, a follow-up survey was conducted on June 25, 2021 to confirm the presence or absence of special status plant species onsite. The Spring Botanical Survey Report identified the following two special-status species located within the project site during appropriately timed botanical surveys. The other 10 special-status plant species are not expected to occur onsite due to unsuitable soil conditions, unsuitable habitat conditions, and verified absence during appropriately timed botanical surveys (Althouse and Meade 2021b).

- **Pismo clarkia (*Clarkia speciosa ssp. immaculata*)** – This species is a federal and state listed species. Approximately 970 individuals of this species were observed onsite. Individuals of this species occur within five total patches throughout the site. Most occurrences are in the southeast portion of the property and there is also a small patch of approximately 100 individuals near the northern property boundary. Pismo clarkia covers approximately 0.57 acre of the 36.71-acre site (Althouse and Meade 2021b).
- **paniculate tarplant (*Deinandra paniculate*) –** This species is a CRPR 4.2 species. Individuals of this species were observed in scattered patches across the project site. Most individuals were observed growing within and to the east of the existing access and along the existing fence line on the west side of the road. Most individuals were observed in annual grassland habitat (Althouse and Meade 2020b).

Special-Status Wildlife

Desktop-level review conducted for the project site identified 53 special-status animal species that occur within the project region. Of the 53 identified species, nine special-status animal species were identified as having the potential to occur within the project area based on the presence of suitable habitat onsite. Based on the Biological Report prepared for the project, there is suitable habitat conditions for the following nine special-status animal species included in Table 1, below.

Table 1. Special-Status Animal Species List

Common Name	Scientific Name	Listing Status	Habitat	Potential to Occur?
Cooper's hawk	*Accipiter cooperii*	CDFW watchlist (for nesting occurrences only)	Suitable habitat for this species includes oak woodlands and riparian habitat for nesting and open fields for foraging.	**High/Present.** There is suitable habitat for this species within the oak woodland habitat onsite. This species was observed foraging and there was one adult individual observed in a coast live oak tree during 2014 field surveys of the site. Therefore, this species is expected to occupy the site.
northern California legless lizard	*Anniella pulchra*	CDFW Species of Special Concern (SSC)	Suitable habitat for this species includes sandy or loose soils under coastal scrub or oak trees for nesting.	**High.** This species was not observed during field surveys of the site. However, there is suitable habitat present for this species onsite; therefore, there is high potential for the species to occur onsite.
pallid bat	*Antrozous pallidus*	CDFW SSC	This species typically includes rock crevices, caves, tree hollows, mines, old buildings, and bridges.	**Low.** There may be roosting habitat for this species in trees onsite; however, the project site does not support typical roosting habitat, including rock crevices and caves. The nearest recorded CNDDB occurrence is over 11 miles away and this species is not anticipated to occur onsite.
white-tailed kite	*Elanus leucurus*	CDFW fully protected species	This species nests in dense trees near open foraging areas.	**Moderate.** There is appropriate nesting and foraging present within the oak trees present at the project site. This species was not observed during field surveys and the nearest recorded occurrence is 14 miles northwest of the property.
western red bat	*Lasiurus blossevillii*	CDFW SSC	This species primarily roosts in trees from sea level up through mixed conifer forests.	**Low.** There is suitable roosting habitat for this species in trees onsite; however, the nearest recorded CNDDB occurrence is over 14 miles away and this species is not anticipated to occur onsite.
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

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Common Name	Scientific Name	Listing Status	Habitat	Potential to Occur?
				the property. Field surveys conducted for were not conclusive for this species (Althouse and Meade 2021a).
California red-legged frog	*Rana draytonii*	Federally listed; CDFW SSC	This species typically occurs in California in the Coast Range, Sierras, the Transverse Range and south below 1,200-meters elevation. The main habitat types for the California red-legged frog (CRLF) 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. Up0land habitat is also necessary for food, shelter, and migration corridors for adults.	**Very Low.** The ephemeral drainage onsite 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 property 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 CRLF individuals. Based on the lack of aquatic habitat provided by the ephemeral drainage, CRLF are not anticipated to occur.
yellow warbler	*Setophaga petechia*	CDFW SSC	This species typically nests in riparian vegetation, including cottonwoods, willows, etc.	**Low.** During previous surveys conducted in 2014 and 2015 for the project site, yellow warblers were observed on the property. Individuals of this species were not identified during 2021 surveys. In addition, there are no riparian trees present onsite that would provide nesting habitat. Therefore, this species is not anticipated to nest onsite.
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.** There is grassland habitat present onsite. However, there were no badgers observed onsite during field surveys. In addition, there were no badger dens nor other evidence of badgers at the project site.

Source: Althouse and Meade 2021a

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?*

The project has the potential to directly or indirectly disturb special-status plant and animal species that may be present within the project area during proposed current and future construction activities. Mitigation Measure BIO-1 requires the retainment of a qualified biological monitor during proposed current and future construction activities. Mitigation Measure BIO-2 requires project personnel to attend an environmental sensitivity awareness training prior to the commencement of project activities.

Special-Status Plants

As discussed in the setting above, two special-status plant species were observed onsite during appropriately timed botanical surveys of the project site.

Pismo Clarkia

As identified above, there is approximately 0.57 acre of Pismo clarkia on the 36.71-acre project site on proposed Lots 3, 5, and 7. However, all the Pismo Clarkia patches are located outside of proposed building envelopes and would be protected through a proposed open space easement with a minimum 100-foot setback. Mitigation Measures BIO-3 through BIO-5 have been included to ensure the avoidance and protection of Pismo clarkia individuals during future residential development.

Paniculate Tarplant

There was patchy distribution of paniculate tarplant observed onsite during appropriately timed 2021 botanical surveys. Proposed current and future construction activities would result in direct removal or other disturbance of paniculate tarplant individuals. Mitigation Measure BIO-6 has been included to mitigate impacts to this species through seed collection and replanting within the proposed open space easement onsite.

Special-Status Wildlife

As discussed in Table 1 above, one special-status bird species was observed onsite and there is potential for eight other special-status animal species to occur onsite.

Special-Status Reptile Species

There is potential for northern California legless lizard and coast horned lizard to be present 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 onsite. Mitigation Measure BIO-7 requires preconstruction surveys to determine if individuals are present within the project site and identifies the protocol in the event individuals are observed onsite.

As discussed in Table 1 above, CRLF are not expected to occur onsite because the project site does not support appropriate aquatic habitat to support movement of the species. However, Mitigation Measure BIO-1 requires the project to retain a qualified biological monitor to monitor the site during construction activities to avoid or minimize potential disturbance to sensitive biological resources, including CRLF if present.

Special-Status Bat Species

Pallid bat and western red bat may roost within oak woodland habitat onsite. Although unlikely, if individuals of these species were present onsite during proposed construction activities, they may be directly disturbed by oak tree removal and/or indirectly disturbed by construction-related noise and dust. Mitigation Measure BIO-8 requires roosting bat surveys prior to construction to avoid potential direct or indirect impacts as a result of development of the site.

Special-Status Mammal Species

As discussed in Table 1 above, based the absence of American badger at the project site, there is low potential this species to occur. However, Mitigation Measure BIO-9 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 individuals were observed onsite during prior field surveys and 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 disturbs individuals through construction-related noise and dust generation. In addition to Cooper's hawk individuals, there is potential for other nesting or migratory bird species, including white-tailed kite and yellow warbler, to be present within the project area. Mitigation Measure BIO-10 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-10 potential impacts related to disturbance of special-status plants and animals 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 three habitat types, including California annual grassland, coast live oak woodland, and coastal scrub (Althouse and Meade 2021a). The identified habitat types are not considered sensitive natural communities by the CDFW (CDFW 2021). Oak woodland habitat is a protected resource by the County's COSE. Implementation of the project would result in the removal of 81 individual oak trees (Althouse and Meade 2021c). The project includes a RRM plan which proposes to replace removed oak trees at a 4:1 ratio. Assuming 1,000 square feet per tree proposed to be removed, the project has a mitigation obligation of 324,000 square feet (7.4 acres) of oak woodland habitat. The project would protect 566,280 square feet of oak woodland habitat within open space easements onsite (Althouse and Meade 2021c). Mitigation Measures BIO-11 and BIO-12 ensure that the proposed open space easement is recorded on final project plans and would be monitored and maintained. In addition, Mitigation Measure BIO-13 identifies measures to protect other oaks onsite. Therefore, potential 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?

As discussed above, there is approximately 0.21 acre of State jurisdictional wetlands within the project site (Althouse and Meade 2021d). There is potential for future residential development and proposed site improvements to result in the filling of portions of the jurisdictional feature and/or increasing erosion and sedimentation. The project would be required to prepare a SWPPP with best management practices (BMPs) and an Erosion and Sedimentation Control Plan (LUO 22.52.120) in order to avoid or minimize any potential polluted runoff. In addition, Mitigation Measure BIO-15 includes construction BMPs to reduce runoff during current and future construction activities. The project would also be required to coordinate with the Regional Water Quality Control Board (RWQCB) to retain permits and implement recommended measures for work within State jurisdictional wetlands. Based on required compliance with the County's LUO, implementation of

Mitigation and Measure BIO-15, and required compliance with RWQCB permitting, the project would not result in adverse effects to jurisdictional wetlands onsite; 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?

The project site is not located within an identified wildlife corridor and the ephemeral drainage does not provide connectivity to Arroyo Grande Creek (Althouse and Meade 2021a). The ephemeral drainage onsite does not support a consistent level of water or adequate connectivity to provide migratory fish habitat. Therefore, the project site does not support any migratory fish species and implementation of the project would not interfere with the movement of migratory fish species.

The project site supports oak woodlands and annual grassland that may provide suitable nesting and foraging habitat for migratory bird species. As described above, Cooper's hawk and yellow warbler individuals have been observed on the project site. Mitigation Measure BIO-10 requires nesting bird surveys prior to the start of work during nesting bird season (February 1 to September 1) and identifies the proper protocol if nesting birds are present onsite. 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?

The County's Inland LUO Chapter 22.58 establishes regulations for clear-cutting oak woodlands. The project site supports 15 acres of oak woodland habitat and would result in the removal of 81 oak trees for site improvements and future residential development. As discussed above, the project includes a RRM plan which proposes to replace removed oak trees at a 4:1 ratio. Assuming 1,000 square feet per tree proposed to be removed, the project has a mitigation obligation of 324,000 square feet (7.4 acres) of oak woodland habitat. The project would protect 566,280 square feet of oak woodland habitat within open space easements onsite (Althouse and Meade 2021c). Mitigation Measures BIO-11 and BIO-12 requires the proposed open space easement to be recorded on final project plans and to be formally submitted to the County for recordation. In addition, Mitigation Measure BIO-13 identifies measures to reduce disturbance to other oaks onsite. Therefore, the project would be consistent with the County's LUO and potential 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-15 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 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 two weeks to the Department of Planning and Building**, 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. **Botanical Restoration Plan. Prior to approval of tract improvement plans**, the applicant shall submit a restoration plan prepared by a qualified biologist for special status plant species (not including oaks, oaks are instead subject to BIO-11 and 12) and submit to the County for review and approval, in consultation with the United States Fish and Wildlife (USFWS), and California Department of Fish and Wildlife (CDFW), if necessary. If any Incidental Take Permits are required, the restoration plan shall be consistent with them. At a minimum, the plan shall include:

a. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to ensure successful reestablishment. Restoration areas shall be located within open space and conservation easements onsite.

b. Provide for a native plant salvage and seed collection effort prior to ground disturbing activities. Salvaged plants shall include, but not be limited to, special status plant species that may be affected.

c. Updated quantification of impact based on finalized tract improvement plans and quantification of mitigation areas such that the replacement criteria are met.

d. A program schedule and success criteria for a minimum five-year monitoring and reporting program that is structured to ensure the success of the restoration plan.

e. For in-kind replacement of Pismo clarkia (Clarkia speciosa ssp. immaculata), individuals that are removed or damaged shall be replaced in-kind at a 2:1 ratio (based on square feet cover) within the designated restoration area with 100% success in five years (inclusive of replacement plantings for unsuccessful individuals). **Prior to any removal or impacts (take) to Pismo clarkia,** the applicant shall provide evidence that an Incidental Take Permit (ITP) has been obtained and shall also provide a copy of the Habitat Conservation Plan that accompanies the ITP. Current mapped locations (within 2 years of permit issuance) of Pismo clarkia shall be protected by a minimum buffer of 100-feet. No development shall occur within the 100-foot buffer zone. At the time of construction on lots containing Pismo clarkia, protective fencing shall be installed to delineate the 100-foot protective buffer. The fencing shall remain in place until all construction on the Lot is completed and a qualified biologist determines the fence may be removed

f. For in-kind replacement of paniculate tarplant, individuals that are removed or impacted shall be replaced in-kind at a 2:1 ratio (based on square feet cover) within the designated restoration area with 100% success in 5 years (inclusive of replacement plantings for unsuccessful individuals).

g. Identification of access and methods of materials transport to the restoration area, including personnel, vehicles, tools, plants, irrigation equipment, water, and all other similar supplies. Access shall not result in new or additional impacts to habitat and special-status species.

h. Incorporation of an invasive species control program, which would include the following at a minimum:

i. To avoid the spread of invasive species, the contractor will stockpile topsoil and redeposit the stockpiled soil on the slopes after construction is complete, or if heavily infested with invasive species, transport the topsoil to a certified landfill for disposal.

ii. During construction, the project will make all reasonable efforts to limit the use of imported soils for fill. Soils currently existing on-site should be used for fill material. If the use of imported fill material is necessary, the imported material must be obtained from a source that is known to be free of invasive plant species; or the material must consist of purchased clean material such as crushed aggregate, sorted rock, or similar.

iii. The restoration planting plans must emphasize the use of native species expected to occur in the area. Project plans must avoid the use of plant species that the Cal-IPC, Cal-EPPC, CDFW, or other resource organizations considers to be invasive or potentially invasive. Prior to issuance of County grading permits, the County shall verify that restoration plans do not include the use of any species considered invasive by the Cal-IPC, Cal-EPPC, or CDFW.

If performance standards detailed in the final restoration plan are not achieved in any restoration area, the applicant shall submit and implement an alternative or adaptive mitigation strategy during the restoration and monitoring phase for approval to the San Luis Obispo County Planning and Building Department, in consultation with other appropriate resource agencies including the United States Fish and Wildlife and/or the California Department of Fish and Wildlife.

BIO-4 **Identify Biological Constraints on Plan Sets.** All Pismo clarkia and special-status plant occurrences on the Property shall be clearly shown on all plan sets prior to issuance of grading or building permits. Special status plant locations must be less than 2 years old at the time of permit issuance to ensure no new occurrence of state or federally listed species would be impacted. If rare plant mapping is greater than 2 years old, a qualified biologist shall complete a focused rare plant survey according to current agency protocols. A rare plant survey report shall be submitted to the County with an updated map overlay of special status plant locations, development plans, and proposed Open Space Easements.

BIO-5 **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 one-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 eight 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, 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-6 **Special-Status Bats. Prior to approval of tract improvement plans but within two 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 California Department of Fish and Wildlife, will install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies shall not be disturbed.

BIO-7 **Special-Status Mammals. Prior to approval of tract improvement plans but within two 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 of San Luis Obispo. 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 Property during the pre-construction survey, the CDFW wildlife biologist for the area shall be contacted to review current allowable management practices.

BIO-8 **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 (BIO-1) shall conduct preconstruction surveys for potential nesting birds within the

recognized breeding season (February 1 to 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 of San Luis Obispo.

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 of San Luis Obispo 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-9 **Open Space Easement.** The project would remove approximately 2 acres of the 15 acres of coast live oak woodland habitat on the project site. The applicant has proposed to place approximately 21.3 acres of the property into open space easements (including the 13 remaining acres of oak woodlands) to mitigate this impact. The open space area would also serve to protect onsite Pismo clarkia populations and any special status species restoration required by the Botanical Restoration Plan (BIO-3). **Prior to recordation of the final map,** the applicant shall enter into an agreement with the County, in a form acceptable to County Counsel, to create open space easements on all areas outside of the proposed building envelopes, roadways, and vegetation clearance areas (approximately 21.3 acres). The terms of the open space easement will allow only activities that help the long-term protection of native plant species. No structures, grading, site disturbance, native vegetation removal, mowing, disking, off-road vehicle use, crop production, equestrian uses, or other animal raising or keeping activities (unless specifically proposed for long term protection of native species) are allowed in the open space easement area.

Fencing may be allowed along the property lines within the open space provided the fencing does not impact oak trees or visually significant vegetation. Fencing shall be limited to six feet in height and shall be horizontally open to allow for wildlife passage (e.g., five strand

wire fencing, post and rail, not woven wire or panel fencing). Barbed wire and electric fencing shall not be used.

For the life of the project, the Developer agrees to allow the County, a land conservancy, resource agency, or other appropriate entity, the right to enter the open space are shown on the final exhibit to the open space agreement, to ensure compliance with the restrictions and to access the oak woodland population. However, prior to entering the open space area, the County, land conservancy, resource agency, or other appropriate entity shall give a 72-hour notice of intent to enter the site.

These provisions for limited open space use shall be added to any CC&Rs developed for the project.

BIO-10 **Open Space Maintenance. As a part of an additional map sheet of the final tract map, and included as a part of any individual construction permit application**, **and included in any CC&Rs developed for the project,** the following shall apply to the areas within the open space: no oak trees, or other visually significant vegetation, shall be impacted or removed; no activities (including grazing or the keeping of animals) shall be allowed that could adversely impact the open space area. Grazing for weed and invasive plant control may be allowed with the Botanical Restoration Plan (BIO-3) prepared by a qualified biologist and approved by the County of San Luis Obispo Department of Planning and Building. Any removal of non-sensitive vegetation shall be done by hand, and by a qualified individual that can identify and avoid those sensitive species. All applicable plans shall show open space areas and building envelopes, where all trees outside of the building envelopes shall be protected during all construction activities. Plans shall show how these trees will be protected from any disturbance/ compaction at 1-1/2 times the distance between the trunk and dripline edge (e.g., install sturdy fencing, install retaining walls, etc.).

Prior to issuance of construction permits, applicant shall submit a statement from the biological monitor that tree protection measures have been installed. Prior to Final of construction permits, the applicant shall submit report prepared by the Biological Monitor verifying that tree protection measures remained effective during the entire construction phase.

For the life of the project, the Home Owner's Association or similar entity shall be responsible for regular maintenance and reporting to the County of San Luis Obispo Department of Planning and Building. Reporting shall be on an annual basis.

BIO-11 **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 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 (ten percent or less is best, 25 percent 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 OTRPP measures described above.

BIO-12 **Oak Tree Replacement.** If any tract improvement or construction activities result in the removal of an oak tree, trimming of 25 percent 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 **seven year**s. 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 open space easements.

b. Replacement oak trees shall be from regionally or locally collected seed stock grown in vertical tubes or deep one-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 two feet in diameter and two feet deep, shall be use below ground. Planting during the warmest, driest months (June through September) shall be avoided. A landscape and irrigation plan shall be submitted prior to permit issuance and implemented upon approval by the San Luis Obispo 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 three-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 seven 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**.

BIO-13 **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 state and federal 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**

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 which 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.

An Archaeological Inventory Survey was conducted by Cultural Resource Management Services (CRMS) in 2014. A record search was conducted at the Central Coast Information Center (CCIC) at the University of California, Santa Barbara. The records search did not identify any previously recorded cultural resources

within a 1,000-foot radius of the project area. A field survey was conducted on October 9, 2014 and no cultural materials were identified.

Discussion

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

The project site is currently undeveloped; therefore, parcel upgrades and future development of the project would not require removal or demolition of existing structures that could be eligible for listing as a Historical Resource on local, state, and/or federal registers. Therefore, implementation and buildout of the project is not anticipated to result in disturbance historical resources and *no impact* would occur.

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

Based on the archaeological sensitivity of the region, there is limited potential for cultural resources to be located within the project area. According to the Archaeological Inventory Survey prepared for the project, previous studies, records search, and the archaeological field survey did not reveal any cultural resource sites within the project site (CRMS 2014). Proposed site improvements and future residential development would require ground disturbance activities, including vegetation removal, grading, and excavation. In accordance with the County's LUO (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 State of California Health and Safety Code Section 7050.5 and the County's LUO (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 comply with the County's 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

None required.

Initial Study – Environmental Checklist

VI. ENERGY

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

Setting

Local Utilities

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

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

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

Local Energy Plans and Policies

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

State Building Code Requirements

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

Vehicle Fuel Economy Standards

In October 2012, the U.S. Environmental Protection Agency (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 and public utility easement and future residences 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 seven 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). Operation of the project 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's 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 also 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*.

Initial Study – Environmental Checklist

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?	☐	☒	☐	☐
(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?	☐	☒	☐	☐

Initial Study – Environmental Checklist

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

Setting

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) is a California state law that was developed to regulate development near active faults and mitigate the surface fault rupture potential and other hazards. The Alquist-Priolo Act identifies active earthquake fault zones and restricts the construction of habitable structures over known active or potentially active faults. San Luis Obispo County is in a geologically complex and seismically active region. The Safety Element of the County of San Luis Obispo General Plan identifies three active faults that traverse through the county and are currently zoned under the Alquist-Priolo Act: the San Andreas, the Hosgri-San Simeon, and the Los Osos. The 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 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 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 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. As previously described, 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's Safety Element Maps, the project site has low potential for liquefaction. Based on existing site conditions, liquefaction is not anticipated to occur at the project site. 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's Safety Element Maps, the project site has a low and moderate potential for landslides. 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 related to landslide would be *less than significant*.

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

The project includes the subdivision of a single 36.71-acre parcel into seven new lots, the development of a new access road, and the future development of new residential units and associated structures. According to the County's LUO (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 Stormwater Pollution Prevention Plan (SWPPP) with best management practices (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 (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 project would implement standard construction BMPs and other applicable regulations to reduce erosive and polluted runoff that may result from limited earthwork required for the project. In addition, Mitigation Measure BIO-15 includes construction BMPs to reduce sedimentation and erosion during construction activities. Therefore, impacts would be *less than significant with mitigation*.

(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?

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 to moderate landslide potential and low 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*.

(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?

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 impacts would be *less than significant*.

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

Site improvements for future residential development would require installation of a septic system onsite. Based on percolation testing conducted at the project site, subsurface conditions consist of 1.5 to three feet of silty sand topsoil underlain by sandstone bedrock of the Pismo Formation (EarthSystems 2016). Typically, sandy soils are not ideal for septic systems due to the rapid percolation rate. 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. Therefore, impacts would be *less than significant*.

(f) 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 future ground disturbance for residential development. Based on the high potential for paleontological resources to be located within the Monterey formation, Mitigation Measures GEO-1 through GEO-3 have been identified to require paleontological monitoring during 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-15 and the following:

GEO-1 **At time of application for subdivision 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 subdivision improvement plans and any ground-disturbing activities**, based on the Mitigation Measure GEO-1, 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

Greenhouse gasses (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), nitrogen oxides (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*.

(b) 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 seven new residential units and accessory 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	All proposed and future development associated with the project would be consistent with all 2019 California Building Code (CBC) Energy Efficiency Standards and the 2019 Green Building Code standards to ensure new

systems.	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 and mobile home units 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

None required. Impacts would be less than significant and would be further reduced with implementation of Mitigation Measure AQ-1.

Initial Study – Environmental Checklist

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 naturally occurring asbestos (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 Safety Element of the County of San Luis Obispo General Plan provides a Fire Hazard Zones Map that indicates unincorporated areas in the county within a 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 asbestos containing material (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-15 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-15, 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 Branch Elementary School, located approximately 1.5 miles southeast of the project site. Branch Elementary School is not located within one-quarter mile of the project site; therefore, *no impact* 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 impact* 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 impact* 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 36.71-acre parcel into seven new lots and construction of a new access road. Future construction would include vegetation removal, grubbing, excavation, and construction of individual residences and associated structures. Construction activities are not expected to require traffic controls or 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. In addition, other site improvements, including addressing, driveways, gates, etc., would be required to comply with CALFIRE requirements; 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, new residential units and accessory

structures, and associated parcel improvements within a high fire hazard severity zone. Future development would be required to comply with CALFIRE recommendations for roads, access 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-15 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-15.

Initial Study – Environmental Checklist

X. HYDROLOGY AND WATER QUALITY

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

Setting

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

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

There is an ephemeral drainage, made up of two connected drainages, that occurs in the central and southeastern portions of the site and extends approximately 2,185 linear feet. Based on the results of the wetland delineation, the site consists of 0.21 acre of wetland habitat that meets the definition of wetland by the SWRCB. The ephemeral drainage is dry most of the year and conveys stormwater from the northwest to the southeast corner of the project site (Althouse and Meade 2021d).

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 rolling topography that slopes downward toward the eastern portion of the 36.71-acre parcel. There is an unnamed ephemeral drainage that bisects the project site in a northwest to southeast direction and flows through proposed Lots 3, 4, 5, 6, and 7. Future buildout

of the project area would result in the development of seven new residential units, accessory structures, and necessary parcel improvements.

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-15 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 (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. In addition, the project may be required to comply with applicable RWQCB permitting requirements if proposed or future work would directly disturb the onsite ephemeral drainage or wetland areas. 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 paved access road, seven residential homes, accessory structures, and other site improvements on previously undeveloped 36.71-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 and proper stormwater infrastructure would be installed as needed. 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 one existing well and one new proposed well that would be drilled as part of the project. Details regarding water quantity and water quality of the existing well are further discussed in Section XIX, Utilities and Service Systems, threshold (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 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 (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 quantity; 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 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 and the proposed new 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?

Installation of the proposed access road would directly disturb the upper reach of the onsite drainage. Construction activities have the potential to temporarily alter existing drainage patterns onsite and implementation 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-15 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 (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. In addition, the project may be required to comply with applicable RWQCB permitting requirements if proposed or future work would directly disturb the onsite ephemeral drainage or wetland areas. Based on required compliance with existing regulations, 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?

Development of the currently undeveloped parcel would result in increased impervious surface area that has the potential to increase 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 not have 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 seven new residential units, accessory structures, and necessary parcel upgrades including expanded utility infrastructure and road

improvements. Future development of the 36.71-acre parcel 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 (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?

The project site is not located within or adjacent to a 100-year flood zone and there would be *no impact.*

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

The project site is not located in a 100- or 500-year flood zone and is not at risk for tsunami or seiche due to distance from bodies of water. The nearest 100-year flood zone is associated with Arroyo Grande Creek and is located approximately 0.2 mile east of the southeastern portion of the project site (San Luis Obispo County 2021). Due to the project's location and existing conditions, 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's 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 the County's LUO (22.52.120). In addition, Mitigation Measure BIO-15 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 recharge and would require drought management provisions to ensure the long term viability of the aquifer. Therefore, impacts related to hydrology and water quality would be less than significant.

Mitigation

Implement Mitigation Measures BIO-15 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?	☐	☒	☐	☐

Setting

The 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 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 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 36.71-acre parcel into seven lots and future development of residential units and accessory structures 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, impacts would be *less than significant*.

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

The project would be consistent with the property's land use designation and the guidelines and policies for development within the applicable area plan, inland LUO, and 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, 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's LUO, 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 of 1975 (SMARA) 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 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 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.

Initial Study – Environmental Checklist

Discussion

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

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 California Department of Conservation CGS Information Warehouse: Mineral Land Classification map, the project site is not in close proximity to an active mine (DOC 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 impact* 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.

Initial Study – Environmental Checklist

XIII. NOISE

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

Setting

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

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

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

- Hotels and motels
- Bed and breakfast facilities
- Outdoor sports and recreation
- Offices

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

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

Table 2. 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 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 unit is located approximately 50 feet from the northern and southern property boundaries. Implementation of the proposed project would result in the extension of Stagecoach Road for access to the site, stormwater infrastructure, and future construction of new residential units and associated structures on the 36.71-acre property. 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's 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 site does not require demolition, pile driving, or other construction activities that could significantly increase groundborne noise levels within the project vicinity. Proposed and future construction activities would require ground disturbance activities that could sightly increase groundborne noise onsite. 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 impact* 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, upon implementation of the identified mitigation measures, 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)?	☐	☐	☒	☐

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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 Land Use Element 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 36.71-acre parcel into seven new lots that would result in the future development of seven residential units and accessory structures. Implementation of the project would result in marginal population growth as a result of seven new residential units. Marginal population growth is anticipated for the RS land use designation and 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 5 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 4.7 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).

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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 marginal increase in population and new residential units that would result in an increased 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. 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 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 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 supported by existing LMUSD facilities and would not require new or expanded facilities. The project would be required to pay public facility 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. However, no new or expanded recreation facilities would be required as a result of the project. The project would be required to pay public facility 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 new residential units. 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 not require the development or expansion of public facilities and 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 Parks and Recreation Element of the County of San Luis Obispo General Plan establishes goals, policies, and implementation measures for the management, renovation, and expansion of existing parks and recreation facilities and the development of new parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county.

Public facilities fees, Quimby fees, and developer conditions are several ways the County currently funds public parks and recreational facilities. Public facility fees are collected upon construction of new residential units and currently provide funding for new community-serving recreation facilities. Quimby Fees are collected when new residential lots are created and can be used to expand, acquire, rehabilitate, or develop community-serving parks. Finally, a discretionary permit issued by the County may condition a project to provide land, amenities, or facilities consistent with the 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 seven 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 impact* 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 Land Use and Circulation Elements of the County of San Luis Obispo General Plan. The framework establishes goals and strategies to meet pedestrian circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum

access and connectivity between land use designations. Due to the remote location of the project site, there are no pedestrian, bicycle, or public transit facilities within 2 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's Circulation Element. The project would result in seven new residential units in the Residential 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. 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 a Traffic Impact Analysis Memorandum prepared for the project (Central Coast Transportation Consultants, 2019), the 2019 14-parcel iteration of the project would have generated 132 daily trips, based on the Institute of Transportation Engineers Trip Generation Manual. The proposed project, with seven parcels, would therefore generate 66 daily trips. 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 extension of Stagecoach Road to create a new private access road for future development. The access road and future driveway design would be required to comply with County Public Works and CAL FIRE engineering and design requirements for proper development; therefore, impacts would be *less than significant*.

(d) *Result in inadequate emergency access?*

Future construction activities are not anticipated to result in temporary traffic controls or road closures along nearby roadways; however, the project does not require road closures and emergency access would be available during construction activities. The project includes the

extension of Stagecoach Drive, which would provide access to the proposed lots and end in a cul-de-sac. The road would be designed and constructed in accordance with County Public Works and CALFIRE requirements to ensure proper emergency access to the site. Based on required compliance with existing requirements, impacts would be *less than significant*.

Conclusion

The project would be consistent with the 2019 RTP, 2016 Bikeways Plan, and the County's 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.

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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-a-ii) 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 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 consultant opportunity was provided. Referral letters were sent to tribal representatives in October 2016. No tribes requested consultation or provided information regarding significant 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's 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 ity 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 and included the subject project and cumulative proposed and potential development within the aquifer. 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). There is an existing well on the project site, which produces 50 gallons per minute.

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 36.71-acre parcel into seven lots for future residential development and the development of an access road on currently undeveloped

property. The project would require expanded utility connections within the proposed public utility easement including water, wastewater, electricity, stormwater, natural gas, and telephone connections. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-15, 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 (proposed project). 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 area. 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 is then calibrated to depict the change in storage due to regional water level trends (CHG 2018). As shown in Table 3 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 3. 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, this project had proposed the development of 21 single-family homes. Currently, this 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 4 below shows the well interference levels based on these three scenarios.

Table 4. Estimated Cumulative Projects – 1 year Well Interference at Nearest Known Wells to the Proposed Development

Proposed Development	Scenario 1* (feet of interference)	Scenario 2** (feet of interference)	Scenario 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

**Anticipated Interference at proposed buildout for all developments*
***Anticipated Interference if study area housing density is maintained at 3-4 acres/dwelling*
****Anticipated Interference if only Sweet Springs MHP and Mid-State Properties (Hondonada) are completed*
Note: Reprinted from CHG, 2018 (Table 6).

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 private onsite septic systems and would not require connections to a wastewater treatment provider; therefore, *no impact* 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 68.6 pounds (lbs) of waste per day at full buildout, as shown in **Table 5** below.

Table 5. 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	7 units	68.6 lbs

		unit/day		
			Total	**68.6 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 AES-1 and AES-2, AQ-1 and AQ-2, BIO-1 through BIO-15, 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 construction permits for individual lots, 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:

c. the definition of a "severe" drought year (as defined by NOAA's Palmer Drought Severity method or other similarly recognized methodology);

d. identification of general measures available to reduce indoor water usage for future development (to be refined as needed for each use approved);

e. identification of specific measures to be applied for landscape watering;

f. 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 (Barros et al. 2013).

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

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

Discussion

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

Construction activities associated with the proposed access road and future residential development is not anticipated to require traffic controls or road closures and emergency access would be available during construction activities. The proposed access road would be constructed in accordance with CALFIRE and County Public Works requirements to ensure adequate site access. 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 new paved access road, 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 seven 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 project site is not located within a 100-year flood zone and has a low and moderate risk for landslide. 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 animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be *less than significant with mitigation incorporated.*

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

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 Lopez Drive; however, upon implementation of Mitigation Measures AES-1 and AES-2, impacts related to development of the parcel 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. 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+NOx 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-15, 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. 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-15, 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 seven 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 AES-1 and AES-2, AQ-1 and AQ-2, BIO-1 through BIO-15, GEO-1 through GEO-3, and USS 1-6 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.

Initial Study – Environmental Checklist

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	**Not Applicable**
☐	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	**Not Applicable**
☒	CA Department of Forestry (Cal Fire)	**In File****
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☐	Other Other _____	**Not Applicable**
☐		**Not Applicable**

** "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:

Althouse and Meade, Inc. (Althouse and Meade). 2021a. *Biological Report for Greenview Estates SUB2019-00093/TR3073 APN 047-181-001.* January 2021.

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City of Pismo Beach. 2020. *Central Coast Blue Project Paleontological Resources Assessment*. April 2020.

Cleath Harris Geologists, Inc. (CHG) 2015a. *Water Supply Assessment*. July 12, 2015.

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