Morro Shores Mobile Home Park Development Plan / Coastal Development Permit DRC2020-00203 (ED21-091)

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.

Brandi Cummings, SWCA Environmental Consultants	Brandi Cummings Digitally signed by Brandi Cummings Date: 2023.02.01 15:43:58 -08'00'		
Prepared by (Print)	Signature		Date
Nicole Ellis, Senior Planner	Nicole Ellis Digitally signed by Nicole Ellis DN: C=US, E=nellis@co.slo.ca.us, O=County of San Luis Obispo, OU="Planning and Building Department ", CN=Nicole Ellis Date: 2023.02.02 08:33:52 -08'00'	For, Xzandrea Fowler, Environmental Coordinator	
Reviewed by (Print)	Signature		Date

Initial Study – Environmental Checklist

Project Environmental Analysis

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

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

A. Project

DESCRIPTION: A request by **Morro Shores Mobile Home Park (MHP) LLC** for a Development Plan/Coastal Development Permit to allow for the expansion of the existing Morro Shores Mobile Home Park (MHP) containing 164 mobile home units to locate 10 new prefabricated manufactured homes (mobile homes) with driveways and designated carports in the southern portion of the approximately 30-acre parcel and construction of additional site improvements. Site improvements would include construction of additional walkways, steps to new units, roadway extensions, fire access improvements, and neighborhood amenities. The project would result in a total of 14,931 square feet (sf) of new residential floor area and an additional 5,614 sf of site improvements. The project would result in the disturbance of approximately 1.7 acres on the approximately 30-acre parcel. The project is located at 633 Ramona Avenue in the Residential Single-Family (RSF) land use category, in the community of Los Osos (south of Ramona Avenue, approximately 0.4 miles north of Los Osos Valley Road). The site is in the Estero Planning Area and the Coastal Zone.

The project would place an additional 10 new mobile homes within the existing Morro Shores MHP site, which would result in a total of 174 mobile home units and a proposed density of 5.8 dwelling units per acre[1]. The project would result in a total of 20,545 sf of additional impervious surfaces at the project site for a total of 40 percent (12 acres) of lot coverage. In addition to 10 new mobile home units, the project would result in the construction of 10 new on-site parking spaces and five relocated spaces for guest parking, a minimum of two new private parking spaces per additional mobile home unit (20 total spaces), a 20-foot-wide all-weather aggregate emergency access road that connects to Ash Street, west of the southwestern parcel boundary, two new Knox-boxes, and gates. Proposed on-site neighborhood amenities to serve the proposed expansion include a new dog park, an artificial turf putting green, a shade structure, and seating areas.

The applicant has volunteered to offset the water demand of the new mobile homes and landscaping at a 2:1 ratio by retrofitting existing washing machines within the park, consistent with the County's Los Osos Groundwater Basin Plumbing Retrofit-to-Build Program (Title 19) offset value in place at the time of land use

[1] The allowable maximum density of the project site per Coastal Zone Land Use Ordinance Section 23.08.164 is 8 dwelling units per acre.

permit approval or the revised value resulting from the forthcoming Los Osos Water Offset Study[2], whichever is less. The applicant conducted a survey of residents in March of 2021 and in June of 2021 the results were compiled which indicated 164 mobile home occupants were surveyed, 152 responses were received, and 98 mobile home occupants indicated interested in participating in washing machine retrofits. The Title 19 program assigns a credit of 35 to 70 gallons per washing machine. Assuming a conservative calculation using 35 gallons per washing machine, the applicant would retrofit at least 73 mobile homes to meet their 2:1 proposed offset.

The project would require the extension of existing utility infrastructure, including gas, electrical, water, and sewer lines within the project site. The project would continue to be provided water for domestic and fire protection services by Golden State Water Company. The Los Osos Community Services District (LOCSD) would continue to provide sewage disposal for the project. The project includes stormwater control measures, such as permeable pavers within proposed driveways and a storm drain and retention basin system. Proposed landscaping for the project would encompass approximately 17,080 sf of common areas and would comply with the County's water-efficient landscape requirements and the approved plant list.

The proposed 10 lots and site improvements would be developed in one phase of construction. Based on the existing site being developed/improved, minimal earthwork would be required for the proposed project. A Coastal Development Permit is required due to the project's location in the Coastal Zone and because of permit requirements of Section 23.08.164 - Mobilehome Parks of the Coastal Zone Land Use Ordinance; the project is considered appealable development as set forth in Public Resources Code Section 30603(a) due to the Special Use (S) designation of mobile home parks in the County's Local Coastal Program (Table O) and the proximity of the project site to a known archaeological site.

ASSESSOR PARCEL NUMBER(S): 074-229-020

Latitude: 35° 19' 06.71" N **Longitude:** 120° 50' 29.10" W **SUPERVISORIAL DISTRICT #** 2

B. Existing Setting

Plan Area: Estero **Sub:** **Comm:** Los Osos

Land Use Category: Residential Single Family

Combining Designation: Archaeolgically Sensitive, Coastal Zone

Parcel Size: 29.99 acres

Topography: Nearly level

Vegetation: Urban-built up Ruderal Ornamental landscaping

Existing Uses: Morro Shores Mobile Home Park

Surrounding Land Use Categories and Uses:

North: Sweet Springs Nature Preserve Area; Morro Bay ***East:*** Residential Single Family; undeveloped single-family residence(s)

[2] The County has signed a contract with Maddaus Water Management Inc. to prepare a study to update water usage estimates for urban and rural residences sourcing water from the Los Osos Groundwater Basin, propose new water conservation measures for the Title 19 program, and estimate remaining water savings potential for the community. The update is in process and is expected to be complete in the second half of 2023.

Initial Study – Environmental Checklist

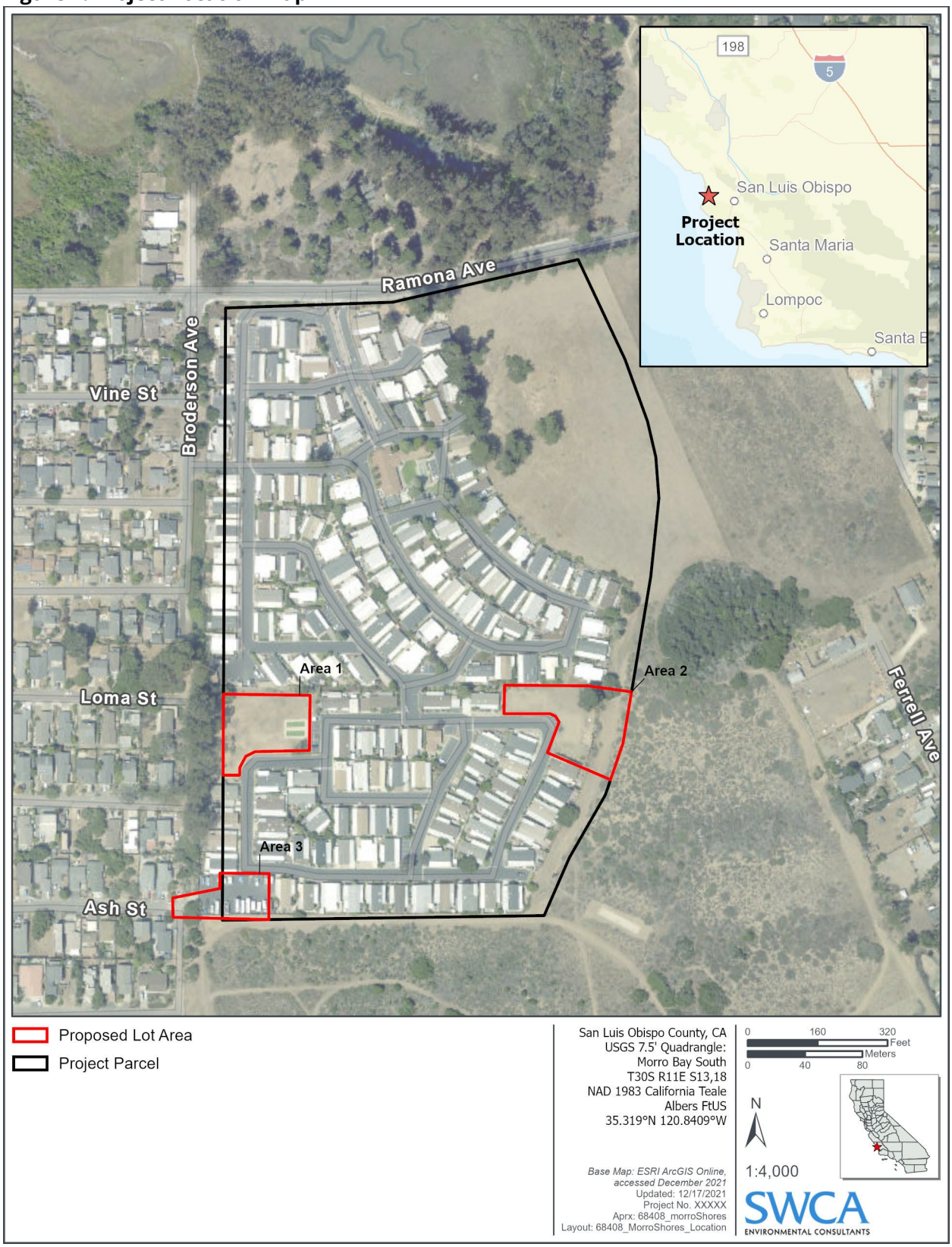
South: Residential Single Family; Residential Multifamily ***West:*** Residential Single Family; single-family residence(s) undeveloped

Baseline Conditions

The approximately 30-acre project parcel is located in the Residential Single Family (RSF) land use category in the Estero Planning Area. The site is currently developed with 164 mobile home units, internal roadways, and other site improvements associated with the Morro Shores MHP. The project site is surrounded by the Morro Coast Audubon Sweet Springs Nature Preserve and mobile home units to the north, undeveloped land and single-family residences to the east and south, and single-family residences to the west. The parcel to the east of the project site has a Residential Multi-Family land use designation but has not been developed. The project would be accessed by Ramona Avenue, located directly north of the project site; Broderson Avenue, located directly west of the site; or via a proposed access connection from Ash Street, located at the southwestern boundary of the site (emergency access only). The project site supports urban and built-up, ruderal, and ornamental landscaping. There are no surface water features, rock outcroppings, or heritage trees on the project site. The topography of the project site and surrounding area is flat with an average slope of 4%.

Initial Study – Environmental Checklist

Figure 1. Project Location Map



Initial Study – Environmental Checklist

Figure 2. Site Plan

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

CEQA establishes that it is the policy of the state to take all action necessary to provide people of the state "with… enjoyment of aesthetic, natural, scenic and historic environmental qualities" (Public Resources Code [PRC] Section 21001(b)).

A scenic vista is generally defined as a high-quality view displaying good aesthetic and compositional values that can be seen from public viewpoints. 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 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. Within

the County Coastal Zone, there is one officially designated state scenic highway and several eligible state scenic highways. SR 1 is an Officially Designated State Scenic Highway and All-American Road from the city of San Luis Obispo to the northern San Luis Obispo County boundary. Portions of U.S. Route (US) 101, SR 46, SR 41, SR 166, and a southern portion of SR 1 are also classified as Eligible State Scenic Highways – Not Officially Designated.

The *County of San Luis Obispo Coastal Zone Land Use Ordinance* (CZLUO) establishes regulations for visual resources that apply to all projects that are visible from the shoreline, public beaches, the Morro Bay estuary, and any of the roads specified in the applicable planning area standards for Critical Viewsheds, Scenic Corridors or Sensitive Resource Areas (SRAs) intended to protect visual resources (CZLUO 23.04.210). Structures that are not visible from these locations or agricultural structures that are 600 sf or less in area or other minor agriculturally related development are exempt from these standards. The County CZLUO also includes a section detailing standards for all outdoor night-lighting sources, with the exception of streetlights located within public rights-of-way and all uses established in the Agriculture land use category (CZLUO 23.04.320).

The *County of San Luis Obispo General Plan Conservation and Open Space Element* (COSE) provides guidelines for the appropriate placement of development so that the natural landscape continues to be the dominant view in rural parts of the county and to ensure the visual character contributes to a robust sense of place in urban areas. COSE provides a number of goals and policies to protect the visual character and identify of the county while protecting private property rights, such as the identification and protection of community separators (rural-appearing land located between separate, identifiable communities and towns), designation of scenic corridors along public roads and highways, retaining existing access to scenic vista points, and ensuring that new development in Urban and Village areas are consistent with the local character, identity, and sense of place. Policies in the County COSE supplement CZLUO policies, except when the County COSE policies conflict with CZLUO policies, for which the County CZLUO policies would control (COSE 9.2).

The 29.99-acre project parcel is located in an urban area within the Residential Single-Family (RSF) land use category. The project site is developed with 164 mobile home units, internal roadways, and other site improvements associated with the Morro Shores MHP. The project site is surrounded by the Sweet Springs Nature Preserve to the north, undeveloped land and single-family residences to the east and south, and single-family residences to the west. The parcel east of the project site has a Residential Multi-Family land use designation but has not been developed. The project would be accessed by Ramona Avenue, located directly north of the project site; Broderson Avenue, located directly west of the site; or via a proposed access connection from Ash Street, located at the southwestern boundary of the site. In addition, Los Osos Valley Road, which is a suggested scenic corridor in the County's COSE, is located approximately 0.3 mile south of the project site and provides access to the community from San Luis Obispo. The project site supports urban and built-up, ruderal, and ornamental landscaping. There are no surface water features, rock outcroppings, or heritage trees on the project site. Topography of the project site and area is flat with an average slope of 4%.

Discussion

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

The nearest suggested scenic corridor included in the County's COSE is Los Osos Valley Road located approximately 0.3 mile south of the project site; however, due to intervening vegetation, the site would not be visible from Los Osos Valley Road. The project site is not located within a designated

scenic vista, a visually sensitive area, or an area with high scenic quality. Further, the project site is currently developed with mobile home units and other site improvements and the proposed development would be consistent with existing and surrounding land uses. Therefore, the project would not have a substantial adverse effect on a scenic vista and *no impacts* would occur.

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

The nearest designated state scenic highway is State Route (SR) 1, approximately 3.3 miles northeast of the project site. Due to distance and intervening topography, development, and vegetation, the project would not be visible from SR 1 and implementation of the project would not result in damage to scenic resources within the viewshed of a state scenic highway. Therefore, *no impacts* would occur.

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

The project is located in an urban area within the RSF land use designation. The proposed project includes the addition of 10 new single-story mobile home units with driveways and designated carports (with two private spaces) for each unit. Four units would be located along the western property line and the remaining six units would be located along the eastern property line adjacent to existing Morro Shores MHP mobile home units (see Figures 1 and 2). The project also includes construction of on-site neighborhood amenities including a new dog park, an artificial turf putting green, a shade structure, and seating area. Proposed development would not exceed 18 feet in height, which is below the maximum allowable height of the RSF land use category. The project would also be consistent with the allowable density and other development standards of the RSF land use category. In addition, proposed mobile home units would be similar in design and style to existing mobile home units within the Morro Shores MHP. As described in Impact I(a), the project would not have a substantial adverse effect on a scenic vista, which is consistent with the County's COSE and other applicable County planning documents. Therefore, the proposed project would not conflict with applicable land use designation standards or other regulations governing scenic quality and impacts would be *less than significant*.

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

The project does not propose the use or installation of highly reflective materials that would create a substantial source of glare. The project would be consistent with the level of existing development in the project vicinity and does not propose the installation or use of new outdoor lighting that would differ substantially from existing development. While no new lighting is proposed at this time, it is anticipated that the future mobile home units would have exterior lighting, such as porch lighting, consistent with the existing mobile home units. In addition, the project would be required to comply with CZLUO Section 23.04.320 for outdoor lighting requirements. Therefore, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area and potential impacts would be *less than significant.*

Initial Study – Environmental Checklist

Conclusion

The project would not result in a substantial change to a scenic vista, scenic corridor, or other scenic resources in the area. The project would be consistent with existing policies and standards in the County's CZLUO and COSE related to the protection of scenic resources. Potential impacts to aesthetic resources would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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?	☐	☐	☐	☒

Initial Study – Environmental Checklist

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Setting

The County of San Luis Obispo supports a unique, diverse, and valuable agricultural industry that can be attributed to its Mediterranean climate, fertile soils, and sufficient water supply. Wine grapes are regularly the top agricultural crop in the county. Top value agricultural products in the county also include fruit and nuts, vegetables, field crops, nursery products, and animals. The County of San Luis Obispo Agriculture Element includes policies, goals, objectives, and other requirements that apply to lands designated in the Agriculture land use category. In addition to the Agriculture Element, in accordance with Sections 2272 and 2279 of the California Food and Agriculture Code, the County Agricultural Commissioner releases an annual report on the condition, acreage, production, pest management, and value of agricultural products within the county. The most recent annual crop report can be found here: https://www.slocounty.ca.gov/Departments/Agriculture-Weights-and-Measures/All-Forms-Documents/Information/Crop-Report.aspx.

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and current land use. For environmental review purposes under CEQA, the FMMP categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land are considered 'agricultural land'. Other non-agricultural designations include Urban and Built-up Land, Other Land, and Water. Based on the FMMP, soils at the project site are designated as Urban and Built-Up Land (DOC 2016).

According to the Soil Survey for San Luis Obispo County and the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2021), the project site is underlain by Baywood Fine Sand, 2 to 9 percent slopes. This sandy soil is somewhat excessively well drained, has rapid permeability, and has very low runoff. The depth to water table is more than 80 inches. This soil is not considered prime farmland.

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

According to Public Resources Code Section 12220(g), forest land is defined 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 as land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. The project site does not contain any forest land or timberland.

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 project site is designated as Urban and Built-Up Land and does not contain land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as designated by the FMMP. Therefore, the project would not result in the conversion of Farmland pursuant to the FMMP to a non-agricultural use and *no impacts* would occur.

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

The project site does not include land within the Agriculture land use designation or land subject to a Williamson Act contract. Therefore, the project would not conflict with existing land use designations for agricultural use or a Williamson Act contract and *no impacts* would occur.

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

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

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

The project site does not contain forest land or timberland and would not result in the loss or conversion of these lands to non-forest use; therefore, *no impacts* would occur.

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

The project site is not located in close proximity to Farmland or forest land and the project would not conflict with existing agricultural uses. The project would not increase demand on agricultural water supplies or facilities and would not affect proximate agricultural support facilities. Therefore, the project would not result in changes in the existing environment that could result in the conversion of Farmland to non-agricultural uses or forest land to non-forest uses; therefore, *no impacts* would occur.

Conclusion

The project would not directly or indirectly result in the conversion of Farmland, forest land, or timber land to non-agricultural uses or non-forest uses and would not conflict with agricultural zoning or otherwise adversely affect agricultural resources or uses. No potentially significant impacts to agriculture, forest land, or timberland would occur, and mitigation is not necessary.

Mitigation

None required.

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

Regulatory Agencies and Standards

San Luis Obispo County is part of the South Central Coast Air Basin, (SCCAB) which also includes Santa Barbara and Ventura Counties. Air quality within the SCCAB is regulated by several jurisdictions including the U.S. Environmental Protection Agency (EPA), California Air Resources Board (ARB), and the San Luis Obispo County Air Pollution Control District (SLOAPCD). Each of these jurisdictions develops rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. The California ARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA) of 1988. The State Department of Public Health established California Ambient Air Quality Standards (CAAQS) in 1962 to define the maximum amount of a pollutant (averaged over a specified period of time) that can be present without any harmful effects on people or the environment. The California ARB adopted the CAAQS developed by the Department of Public Health in 1969, which had established CAAQS for 10 criteria pollutants: particulate matter (PM_{10} and $PM_{2.5}$), ozone (O_3), nitrogen dioxide (NO_2), sulfate, carbon monoxide (CO), sulfur dioxide (SO_2), visibility reducing particles, lead (Pb), hydrogen sulfide (H_2S), and vinyl chloride.

The Federal Clean Air Act (FCAA) later required the U.S. EPA to establish National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment, and also set

deadlines for their attainment. The U.S. EPA has established NAAQS for six criteria pollutants (all of which are also regulated by CAAQS): CO, lead, NO_2, ozone, PM_{10} and $PM_{2.5}$, and SO_2.

California law continues to mandate compliance with CAAQS, which are often more stringent than national standards. However, California law does not require that CAAQS be met by specified dates as is the case with NAAQS. Rather, it requires incremental progress toward attainment. The SLOAPCD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions within the county are maintained.

SLOAPCD 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.

The SLOAPCD has 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 (NOx), reactive organic gases (ROG), greenhouse gases (GHG) and diesel particulate matter (DPM), are most significant when using large, diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators and other heavy equipment. SLOAPCD has established thresholds of significance for each of these contaminants.

The SLOAPCD CEQA Air Quality Handbook provides thresholds of significance for construction related emissions. Table 1 lists SLOAPCD's general thresholds for determining whether a potentially significant impact could occur as a result of a project's construction activities.

Table 1. SLOAPCD Thresholds of Significance for Construction Activities

Pollutant	**Threshold** (1)		
	Daily	**Quarterly Tier 1**	**Quarterly Tier 2**
Diesel Particulate Matter (DPM)	7 lbs	0.13 tons	0.32 tons
Reactive Organic Gases (ROG) + Oxides of Nitrogen (NO_X)	137 lbs	2.5	6.3 tons
Fugitive Particulate Matter (PM_{10}), Dust (2)		2.5 tons (2)	

1. Daily and quarterly emission thresholds are based on the California Health and Safety Code and the CARB Carl Moyer Guidelines.
2. Any project with a grading area greater than 4.0 acres of worked area can exceed the 2.5-ton PM_{10} quarterly threshold.

The SLOAPCD CEQA Air Quality Handbook also provides preliminary screening construction emission rates based on the proposed volume of soil to be moved and the anticipated area of disturbance. Table 2 lists the SLOAPCD's screening emission rates that would be generated based on the amount of material to be moved. The SLOAPCD's CEQA Handbook also clarifies that any project that would require grading of 4.0 acres or more can exceed the 2.5-ton PM10 quarterly threshold listed above.

Table 2. Screening Emission Rates for Construction Activities

Pollutant	Grams/Cubic Yard of Material Moved	Lbs/Cubic Yard of Material Moved
Diesel Particulate Matter (DPM)	2.2	0.0049
Reactive Organic Gases (ROG)	9.2	0.0203
Oxides of Nitrogen (NO_X)	42.4	0.0935
Fugitive Particulate Matter (PM_{10})	0.75 tons/acre/month of construction activity (assuming 22 days of construction per month)	

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial and industrial development. Certain types of project can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (source emissions).

General screening criteria is 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's 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 APCD'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 ten percent (10%) of exceeding the screening criteria.

Air Quality Monitoring

The county's air quality is measured by a total of 10 ambient air quality monitoring stations, and pollutant levels are measured continuously and averaged each hour, 24 hours a day. The significance of a given pollutant can be evaluated by comparing its atmospheric concentration to state and federal air quality standards. These standards represent allowable atmospheric containment concentrations at which the public health and welfare are protected and include a factor of safety. The SLOAPCD prepares an Annual Air Quality Report detailing information on air quality monitoring and pollutant trends in the county. The most recent Annual Air Quality Report can be found here: https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/2017aqrt-FINAL2.pdf.

In San Luis Obispo County, ozone and fine particulates (particulate matter of 10 microns in diameter or smaller; PM_{10}) are the pollutants of main concern, since exceedances of state health-based standards for

these pollutants are experienced in some areas of the county. Under federal standards, the county has non-attainment status for ozone in eastern San Luis Obispo County.

San Luis Obispo County Clean Air Plan

The SLOAPCD's 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 PM_{10}. The CAP presents a detailed description of the sources and pollutants which 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.

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 the 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 with potential for NOA (SLOAPCD 2021).

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, daycare centers, nursing homes, hospitals, and residences. There are existing mobile home units within the project site. The nearest off-site sensitive receptor locations are single-family residences located approximately 50 feet west of the project site.

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 uses, and balancing jobs and housing. The project includes infill development within an existing mobile home park within the RSF land use category. The project would result in an additional 10 new mobile home units. Based on the Estero Area Plan, the average household size in the community of Los Osos is 2.44 persons per occupied dwelling unit; therefore, development of 10 new mobile home units would result in a population increase of approximately 25 residents (County of San Luis Obispo 2009). Additionally, the project does not include the development of new land uses that would generate employment opportunities within the area and implementation of the proposed project would not require a need for additional employees at the mobile home park. Therefore, the project would not result in a substantial increase in population or employment and would not generate a significant increase in vehicle trips due to the low-density nature of the proposed project. Operation of the proposed project would not conflict with or obstruct implementation of the SLOAPCD CAP or

other applicable regional and local planning documents. Therefore, impacts would be *less than significant.*

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

Construction of proposed site improvements would result in the generation of criteria air pollutants including ozone precursors (reactive organic gases [ROGs] and nitrogen oxides [NOx]) and fugitive dust. The county is currently designated as non-attainment for ozone and PM10 under state ambient air quality standards (CARB 2021). Ozone precursors, such as NOx and ROG, would result from the use of large diesel-fueled equipment including scrapers, loaders, bulldozers, haul trucks, compressors, and generators.

The project site has been previously graded for the original development of the Morro Shores MHP and would not require significant earthwork as part of the proposed project. In addition, proposed mobile home units would be manufactured off-site and would not require significant construction activity at the project site. Exact grading volumes (if any) for site improvements are unknown at this time but would involve less than 4 acres of site disturbance and 1,200 cy of earthwork per day, which would not result in exceedances of the SLOAPCD thresholds based on the SLOAPCD screening emission rates for construction activities. Based on the limited proposed construction activities, construction-related emissions would be *less than significant*.

The project would result in the operation of 10 additional mobile home units and other outdoor amenities. Based on the limited scale of proposed development, the project would generate approximately 50 additional vehicle trips per day (SANDAG 2003). The project does not include any operational 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 off-site sensitive receptor locations are single-family residences located approximately 50 feet west of the project site. There are additional off-site residential units located approximately 1,000 feet south, east, and west of the project site. Although proposed construction activities would be limited, there is potential to result in pollutant concentrations, such as fugitive dust, that could disturb nearby sensitive receptors. Mitigation Measures AQ-1 and AQ-2 are included to reduce potential emissions near sensitive receptors through implementation of diesel-idling limitations, vehicle and equipment requirements, and dust minimization measures; 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). The project 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 other adverse emissions or odors; therefore, impacts would be *less than significant*.

Conclusion

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

Mitigation

AQ-1 Standard Mitigation Measures for Construction Equipment. Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first, the following measures shall be implemented during all site disturbance activities and shown on all applicable plans:

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. 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;
4. 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;
5. Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NOx exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
7. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
8. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
9. Electrify equipment when feasible;
10. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,
11. 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:

1. 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
2. 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.

3. 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 Expanded List. 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:

1. Reduce the amount of disturbed area where possible.
2. 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.
3. All dirt stockpile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
4. 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.
5. 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.
6. 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.
7. 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.
8. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
9. 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.
10. "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.

11. 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.
12. 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?	☐	☒	☐	☐
(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?	☐	☐	☐	☒

Initial Study – Environmental Checklist

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
(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

Sensitive Resource Area and Environmentally Sensitive Habitat Area Designations

The County CZLUO SRA combining designation identifies areas of San Luis Obispo County with special environmental qualities, or areas containing unique, sensitive, or endangered vegetation or habitat resources. The County CZLUO establishes specific standards for all uses requiring a land use permit that are located within an SRA combining designation. These standards include requirements for initial submittal of the land use permit application, application content, environmental determination, final permit requirements and processing, required findings, and minimum site design and development standards (23.07.162, 164, 166). These design and development standards include the prohibition of surface mining onsite, setback distances on ocean, lake, and streambank shoreline development, prevention of degradation of lakes, ponds, wetlands, or perennial watercourses, setback distances from geological features visible from offsite, and prevention of disturbance of specific vegetation when the SRA designation is applied because of its presence.

The County CZLUO also includes special provisions for any development proposed within or adjacent to an Environmentally Sensitive Habitat Area (ESHA). The California Coastal Act defines an ESHA as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments (CZLUO 23.07170).

Federal and State Endangered Species Acts

The Federal Endangered Species Act of 1973 (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act of 1984 (CESA) ensures legal protection for plants listed as rare or endangered, and wildlife species formally listed as endangered or threatened, and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or

educational value. Under state law, the California Department of Fish and Wildlife (CDFW) has the authority to review projects for their potential to impact special-status species and their habitats.

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. Minor Use Permit approval is required to remove any Heritage Oak. The project site does not support oak woodland or Heritage Oaks.

Clean Water Act and State Porter Cologne Water Quality Control Act

The U.S. Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetland and non-wetland water bodies that meet specific criteria. USACE jurisdiction regulates almost all work in, over, and under waters listed as "navigable waters of the U.S." that results in a discharge of dredged or fill material within USACE regulatory jurisdiction, pursuant to Section 404 of the Clean Water Act (CWA). Under Section 404, USACE regulates traditional navigable waters, wetlands adjacent to traditional navigable waters, relatively permanent non-navigable tributaries that have a continuous flow at least seasonally (typically 3 months), and wetlands that directly abut relatively permanent tributaries.

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) regulate discharges of fill and dredged material in California, under Section 401 of the CWA and the State Porter-Cologne Water Quality Control Act, through the State Water Quality Certification Program. State Water Quality Certification is necessary for all projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State. Based on the U.S. Fish and Wildlife Service National Wetlands Inventory, the project site does not support wetlands, riparian or deep-water habitats (USFWS 2019).

Conservation and Open Space Element

The intent of the goals, policies, and implementation strategies in the COSE is to identify and protect biological resources that are a critical component of the county's environmental, social, and economic well-being. Biological resources include major ecosystems; threatened, rare, and endangered species and their

habitats; native trees and vegetation; creeks and riparian areas; wetlands; fisheries; and marine resources. Individual species, habitat areas, ecosystems and migration patterns must be considered together in order to sustain biological resources. The COSE identifies Critical Habitat areas for sensitive species including California condor, California red legged frog, vernal pool fairy shrimp, La Graciosa thistle, Morro Bay kangaroo rat, Morro shoulderband snail, tiger salamander, and western snowy plover. The COSE also identifies features of particular importance to wildlife for movement corridors such as riparian corridors, shorelines of the coast and bay, and ridgelines.

Los Osos Communitywide Habitat Conservation Plan and Incidental Take Permit

The County of San Luis Obispo has adopted a Communitywide Habitat Conservation Plan (HCP) for the community of Los Osos. The purpose of the HCP is to "authorize the covered activities while conserving the covered species and their habitats. Implementation of a programmatic, multi-species Habitat Conservation Plan, rather than a species-by-species or project-by-project approach, will maximize the benefits of conservation measures for covered species and eliminate potentially expensive and time-consuming efforts associated with processing individual incidental take permits for each project within the proposed Habitat Conservation Plan area." (County of San Luis Obispo 2021c)

As part of the HCP and Incidental Take Permit (ITP) coverage, the County is required to mitigate the effects of the covered activities on the covered species through implementation of the LOHCP conservation program—a comprehensive program designed to avoid, minimize, and mitigate the impacts of the covered activities to the maximum extent practicable.

Participation in the HCP is voluntary and projects resulting in ground disturbance have other options for compliance with the local, state, and federal permitting requirements that are addressed through this plan. Upon issuance of the ITP by USFWS, establishment of a contract between the Implementing Entity and the County, and achievement of success criteria for the initial 15 acres of required "jump start" mitigation, the Implementing Entity will have the ability to extend take coverage to proponents of eligible projects once the initial habitat management project has achieved the performance criteria established in the LOHCP Adaptive Management and Monitoring Plan (County of San Luis Obispo 2021c).

The subject parcel is located outside of the boundaries of critical habitat units for Morro shoulderband snail (MSS) designated on February 7, 2001. The closest critical habitat unit for Morro shoulderband snail is located approximately 0.53 mile south of the project site. The project site has been previously developed with the Morro Shores MHP and includes urban and built up uses, ruderal vegetation, and ornamental landscaping. The project site is adjacent to undeveloped areas and near native coastal scrub habitat and known locations of Morro shoulderband snail; however, there are no known occurrences within or adjacent to the project site (USFWS 2020).

Protocol surveys for the Morro shoulderband snail were conducted for the proposed project under the authority of a recovery permit (TE180579-1) during five site visits between March 23 and April 20, 2020 (USFWS 2020). Habitat assessments were conducted to assess if native or non-native habitats suitable for Morro shoulderband snails are present. During the surveys, no live or empty shells of Morro shoulderband snails were observed. The project site is covered by sparse non-native vegetation, wood chip layers, bare sand, and completely paved areas. There are no native habitats or isolated individual, mature shrubs that could provide suitable habitat within the project area (USFWS 2020).

Based on a 9-quadrangle search of the CDFW California Natural Diversity Database (CNDDB), the following 10 special-status plant and 12 special-status wildlife species have the potential to occur in the region:

Special-Status Plants

- **adobe sanicle** (*Sanicula maritima*); State, Rare
- **beach spectaclepod** (Dithyrea maritima); State, Threatened
- **California seablite** (*Suaeda californica*); Federal, Endangered
- **Chorro Creek bog thistle** (*Cirsium fontinales var. obispoense*); Federal/State, Endangered
- **Cuesta Pass checkerbloom** (*Sidalcea hickmanii ssp. anomala*); State, Rare
- **Indian Knob mountainbalm** (*Eriodictyon altissimum*); Federal/State, Endangered
- **marsh sandwort** (*Arenaria paludicola*); Federal/State, Endangered
- **Morro manzanita** (*Arctostaphylos morroensis*); Federal, Threatened
- **Pismo clarkia** (*Clarkia speciosa ssp. immaculata*); Federal/State, Endangered/Rare
- **surf thistle** (*Cirsium rhothophilum*); State; Threatened

Special-Status Wildlife

- **California black rail** (*Laterallus jamaicensis coturniculus*); State, Threatened
- **California red-legged frog** (*Rana draytonii*); Federal; Threatened
- **California Ridgeway's rail** (*Rallus obsoletus obsoletus*); Federal/State, Endangered
- **foothill yellow-legged frog** (*Rana boylii*); State, Endangered
- **monarch – California overwintering population** (*Danaus plexippus* pop. 1); Federal, Candidate
- **Morro Bay kangaroo rat** (*Dipodomys heermanni morroensis*); Federal/State, Endangered
- **Morro shoulderband snail** (*Helminthoglypta walkeriana*); Federal; Endangered
- **steelhead - pop. 9 and pop.10** (*Oncorhynchus mykiss irideus*); Federal; Threatened
- **tidewater goby** (*Eucyclogobius newberryi*); Federal, Endangered
- **tricolored blackbird** (*Agelaius tricolor*); State, Threatened
- **western snowy plover** (*Charadrius nivosus nivosus*); Federal, Threatened
- **western yellow-billed cuckoo** (*Coccyzus americanus occidentalis*); Federal/State, Threatened/Endangered

The project site has been previously disturbed and developed for development of the Morro Shores MHP. Based on the built-up nature and disturbance of the project site, it is highly unlikely that special-status plant or animal species would occur onsite.

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?*

Special-Status Plants

The proposed project site has been previously developed with mobile home units and other site improvements and experiences a high rate of disturbance from residents of the Morro Shores MHP, including pedestrian movement, vehicle use, pets, etc. The project site is covered by sparse non-native vegetation, wood chip layers, bare sand, and completely paved areas; therefore, the project site does not support natural habitat that could support special-status plant species (USFWS 2020). Therefore, potential impacts related to special-status plants would be *less than significant*.

Special-Status Wildlife

The project site is developed with 164 mobile home units, internal roadways, and other site improvements associated with the Morro Shores MHP and is covered by sparse non-native vegetation, wood chip layers, bare sand, and completely paved areas (USFWS 2020). There are no existing surface water features that may support aquatic or riparian habitat. There are existing ornamental trees located along the western project site boundary and other ornamental trees sparsely scattered along the edge of the MHP. There are previously developed residential dwellings located to the north and west of the project site and open space areas located to the south and east of the project site. Based on the previously disturbed and developed nature of the project site, it is highly unlikely that suitable habitat for any special-status wildlife species would occur onsite. However, due to existing undeveloped areas to the south and east of the project site, there is some potential for special-status wildlife to be located within the vicinity of the project site.

The following special-status wildlife species were identified by CNDDB as having the potential to occur in the region:

Morro Shoulderband Snail

Based on five MSS surveys conducted at the project site, there are no MSS individuals located within the project area and MSS are not expected to occur within the project area based on the developed and disturbed nature of the site and the lack of native MSS habitat (USFWS 2020). Although there is native vegetation located within the adjacent, undeveloped parcel, the presence of a 6.5-foot-high cinderblock wall is expected to prevent individuals from migrating onsite during the wet season (USFWS 2020). Therefore, it is highly unlikely for the project to result in take of this species. However, due to the sensitivity of this species and proximity to potentially suitable habitat, Mitigation Measure BIO-1 has been included to avoid or minimize impacts to MSS during construction activities. Therefore, potential impacts would be *less than significant with mitigation*.

Special-Status Mammals

Based on a query of the CNDDB, there is potential for Morro Bay kangaroo rat to occur in the region. This species typically occurs in coastal scrub areas (CDFW 2021). There is coastal scrub on the undeveloped parcels located south and east of the project site. There is no coastal scrub habitat within the project site. Although there is coastal scrub habitat adjacent to the project area, this species is not anticipated to occur onsite based on the previously developed nature and high level of existing disturbance at the project site. Therefore, potential impacts to special-status mammals would be *less than significant*.

Special-Status Fish

There is potential for steelhead (populations 9 and 10) and tidewater goby to occur in the region (CDFW 2021). However, based on the lack of surface water features within and adjacent to the project area, these species would not occur onsite. Therefore, *no impact* would occur.

Special-Status Insects

According to a query of the CNDDB, there is potential for monarch butterfly to occur in the region (CDFW 2021). Suitable habitat for this species includes closed-cone coniferous forest (CDFW 2021). The project site does not support suitable habitat for this species; therefore, this species is not anticipated to occur onsite. In addition, this species is not anticipated to occur onsite based on the previously developed condition and existing level of disturbance at the project site. Therefore, potential impacts to special-status insects would be *less than significant*.

Special-Status Amphibians

There is potential for California red-legged frog (CRLF) and foothill yellow-legged frog (FYLF) to occur in the region (CDFW 2021). There are no surface water features within or adjacent to the project site. In addition, the project site has been previously developed and experiences a high rate of disturbance (i.e., humans, vehicles, pets, etc.) that further reduces the potential for these species to occupy the project site. Based on the lack of suitable habitat for this species, special-status amphibians are not anticipated to occur onsite, and impacts would be *less than significant*.

Special-Status Birds

Five special-status bird species have been identified as having potential to occur in the region, including California black rail, California Ridgeway's rail, tricolored black bird, western snowy plover, and western yellow-billed cuckoo (CDFW 2021). Due to previous development, there is sparse tree coverage throughout the mobile home park. Adjacent land provides open space areas and scattered trees that may provide nesting and foraging habitat. Based on the mobility of special-status bird species, there is potential for occurrence within the project area. If special-status bird species are present within the project area, short-term construction-related noise and dust may result in indirect disturbance. Mitigation Measure BIO-2 has been included to require nesting bird surveys prior to the start of construction activities if construction activities occur during the recognized breeding season (February 1 to August 15). If nesting birds are identified during preconstruction surveys, Mitigation Measure BIO-2 also includes appropriate avoidance measures. Therefore, impacts would be *less than significant with mitigation*.

Conclusion

The project site is covered by sparse non-native vegetation, wood chip layers, bare sand, and completely paved areas and experiences a high rate of human disturbance (USFWS 2020). There are no existing surface water features that may support aquatic or riparian habitat. Based on the disturbed and developed nature of the project site, it is highly unlikely for special-status plants or animals to occur within the project site. Due to the presence of ornamental trees and the sensitivity of MSS, Mitigation Measures BIO-1 and BIO-2 have been included to ensure impacts to special-status species that may occur within the project region are avoided and/or minimized if present within the project site at the time of construction. Therefore, impacts 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 is covered by sparse non-native vegetation, wood chip layers, bare sand, and completely paved areas (USFWS 2020). The project site does not support riparian vegetation or

other sensitive natural communities; therefore, the project would not have a substantial adverse effect on any sensitive natural community and *no impacts* would occur.

(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?*

According to the USFWS National Wetland Inventory (NWI) Mapper, there are no mapped blue line creeks or wetland features within or adjacent to the project site (USFWS 2021). Therefore, implementation of the project would not result in direct disturbance to potential wetland areas. The nearest potential wetland area is located approximately 0.25 mile north of the project site (USFWS 2021). Based on the absence of wetlands within the project site and the distance to the nearest wetland, the project would not result in disturbance to any state or federally protected wetlands *no impact* would occur.

(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 or adjacent to wildlife corridors or aquatic resources that could interfere with the movement of migratory fish or wildlife upon implementation of the project. The project includes infill development within the existing Morro Shores MHP and would not result in development on previously undeveloped land that could impede existing wildlife movement in the project region. The MHP has existing block wall, stucco wall, wood fencing, and chain-linked fencing around the perimeter, of various heights. In addition, the project does not include the development of new fencing or other features that may restrict wildlife movement. Land located to the east and south of the project site is undeveloped and would remain undeveloped to continue to provide wildlife movement within the vicinity of the project. Therefore, potential impacts related to wildlife movement would be less than significant.

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

The project would require oak tree trimming per California Department of Forestry and Fire Protection (CAL FIRE) standards but does not require any tree removal; therefore, the project would not conflict with local policies or ordinances pertaining to oak tree removal. The proposed area of disturbance does not support other sensitive resources that are protected by local policies and plans. Therefore, the project would not result in a conflict with local policies or ordinances protecting biological resources and potential impacts would be *less than significant.*

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

The County has prepared a communitywide habitat conservation plan (HCP) for Los Osos to streamline the permitting of certain future activities by providing a program for the protection and enhancement of habitat for listed species that could be negatively impacted by such activities. The County is currently seeking a programmatic ITP from the U.S. Fish and Wildlife Service (USFWS) and is requesting a permit term of 25 years to authorize take of covered species associated with covered activities in the HCP area. The County anticipates receiving the ITP later this year. Covered activities within the HCP include commercial and residential development and redevelopment of previously

owned parcels; public entity and private utility facility and infrastructure projects; public entity and private utility company activities to operate, maintain, and repair existing facilities; and activities conducted to implement the HCP conservation strategy. According to the County, adoption of the HCP and issuance of the ITP(s) will facilitate a streamlined permitting process and also provide a cohesive conservation strategy managed by one entity with a single funding source.

The proposed project would be a covered activity in the HCP; however, the County has not yet finalized the HCP and received the ITP, and, therefore, cannot begin HCP implementation. Participation in the HCP is voluntary and projects resulting in ground disturbance have other options for compliance with the local, state, and federal permitting requirements that are addressed through the HCP. The project site does not support suitable MSS habitat and there were no MSS observed during protocol surveys. In addition, mitigation has been included to ensure avoidance of impacts related to MSS. Since the project is not anticipated to result in take of this species and the HCP has not been finalized, the project would not conflict with an existing HCP; therefore, *no impact* would occur.

Conclusion

Implementation of Mitigation Measures BIO-1 and BIO-2 would avoid or minimize potential impacts to biological resources within the project area. The project would not conflict with local plans or policies protecting biological resources. Therefore, with implementation of the identified mitigation, potential impacts to biological resources would be less than significant.

Mitigation

BIO-1 Morro shoulderband snail.

a. Prior to construction or ground-disturbing activities, the applicant shall obtain a new or extended no-take concurrence letter from the U.S. Fish and Wildlife Service. Based on consultation with the U.S. Fish and Wildlife Service, the following measures shall be implemented to further avoid and/or minimize potential impacts to Morro shoulderband snail during proposed construction activities:

    1. A biologist approved by the USFWS will conduct a preconstruction survey of the work area no more than 48 hours prior to the initiation of site work. The biologist will notify the USFWS of the results of the survey immediately following the survey efforts. No live Morro shoulderband snails will be captured and relocated during these efforts.

    2. A USFWS-approved biologist will conduct a preconstruction environmental awareness training session for all construction personnel involved in site disturbance. The training is intended to inform the permittees, construction crews, field supervisors, and equipment operators about identifying Morro shoulderband snails and its habitat and non-native refugia, the status of the species, and proposed avoidance and minimization.

    3. If Morro shoulderband snail(s) are found in the project area at any time, or if project activities are not complete in one year, all project activities shall cease and coordination with the Ventura Fish and Wildlife Office would be required.

b. If the applicant is unable to obtain a new or extended no-take concurrence from the U.S. Fish and Wildlife Service, the project would be eligible for coverage under the current

proposed terms of County of San Luis Obispo's ("County") Los Osos Habitat Conservation Plan ("LOHCP") awaiting U.S. Fish and Wildlife Service final approval and issuance of an Incidental Take Permit ("ITP"). Following the effective date of the County's ITP and LOHCP, but prior to issuance of related permits, such as from the California Department of Housing and Community Development ("HCD"), the project proponent shall secure a Certificate of Inclusion ("COI") from the County, which would confer take coverage under the ITP. The project proponent shall comply with the terms of the COI and ITP, which includes compliance with the LOHCP. If the County finds that the project proponent is out of compliance with the terms of the COI and ITP, the County has the authority to revoke the COI. Without a valid COI, all work relating to the project shall cease immediately. If, following two years from the effective approval date of the project, unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050, the ITP has not been issued by the U.S. Fish and Wildlife Service and the LOHCP is not in effect, the project will not have coverage under a County ITP. Without coverage under a County ITP, no site disturbance or construction may occur at the site, and no building permits may be approved without amendment of this land use permit. Amendment of this land use permit to allow the project to proceed without coverage under a County ITP will require submittal of an application to amend this land use permit and the necessary surveys and reports to properly consider and address the potential for incidental take (harm, injure, capture and/or kill) of Morro Shoulderband Snail (Helminthoglypta walkeriana), and the application to amend this land use permit (including its environmental determination and conditions of approval) would require review and approval by the appropriate Review Authority.

BIO-2 **Nesting and Migratory Birds.** Prior to any site disturbance (i.e., mobilization, staging, grading or construction, tree and vegetation removal or trimming) within the recognized breeding season (February 1 to August 15), a County-qualified biologist shall conduct a preconstruction survey for potential nesting birds 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.

V. CULTURAL RESOURCES

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

Setting

San Luis Obispo County possesses a rich and diverse cultural heritage and has an abundance of historic and prehistoric cultural resources dating as far back as 9,000 B.C. The County protects and manages cultural resources in accordance with the provisions detailed by CEQA and local ordinances. PRC Section 5024.1 requires that any properties that can be expected to be directly or indirectly affected by a proposed project be evaluated for California Register of Historical Resources (CRHR) eligibility. The purpose of the CRHR is to maintain listings of the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change.

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.

The COSE identifies and maps anticipated culturally sensitive areas and historic resources within the county and establishes goals, policies, and implementation strategies to identify and protect areas, sites, and buildings having architectural, historical, Native American, or cultural significance. Based on the COSE, the project is located in an Archaeologically Sensitive Area.

In the event of an accidental discovery or recognition of any human remains, California State Health and Safety Code Section 7050.5 require that no further disturbances shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

Discussion

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

The project would not require the removal or modification of any buildings or structures within or adjacent to the project site; therefore, the project would not result in an adverse change in the significance of a historical resource and impacts would be *less than significant.*

(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?

The project is located in an archaeologically sensitive area and several prehistoric archaeological sites have been previously identified in the project vicinity, some of which contain human remains. Therefore, the project area is considered moderately sensitive for the presence of buried and/or obscured archaeological resources. The project would require limited ground disturbance for implementation of the proposed project, which reduces the potential to uncover unknown cultural resources if located within the project site. Since the project site is located in an archaeologically sensitive area, Mitigation Measure CR-1 would require the development of an Archaeological Monitoring Plan (AMP) and associated archaeological monitoring procedures during initial ground-disturbing activities. The AMP would appropriately identify and address archaeological finds encountered during construction monitoring and would include measures to avoid or reduce potential impacts to cultural resources. Additionally, the project would be required to comply with the protocol identified in CZLUO Section 23.07.104 - Archaeologically Sensitive Areas and California Health and Safety Code Section 7050.5 for inadvertent discovery of human remains. Implementation of Mitigation Measure CR-1 and compliance with CZLUO Section 23.07.104 and California Health and Safety Code Section 7050.5 would ensure impacts to archaeological resources, including human remains, are avoided and minimized. Therefore, potential impacts associated with archaeological resources and the disturbance of human remains would be *less than significant with mitigation*.

Conclusion

The project does not require removal or modification of any buildings or structures that may qualify as a historical resource. The project site is located in an archaeologically sensitive area and several prehistoric archaeological sites have been previously identified in the project vicinity, some of which contain human remains. Mitigation Measure CR-1 has been included to require preparation and implementation of an AMP, which would ensure impacts to archaeological resources, including human remains, are avoided and minimized. Therefore, with implementation of the identified mitigation measure impacts would be less than significant.

Mitigation

CR-1 **Archaeological Monitoring Plan.** Prior to project implementation, the applicant shall prepare an Archaeological Monitoring Plan (AMP) for review and approval by the County of San Luis Obispo Department of Planning and Building. A standard clause shall be included in

every grading and construction contract to inform contractors of this requirement. The AMP shall include, but not be limited to, the following:

a. A list of personnel involved in the monitoring activities;

b. Description of how the monitoring shall occur;

c. Description of frequency of monitoring (e.g., full time, part time, spot checking);

d. Description of what resources are expected to be encountered;

e. Description of circumstances that would result in the halting of work at the project site;

f. Description of procedures for halting work on the site and notification procedures;

g. Description of monitoring reporting procedures; and

h. Specific, detailed protocols for what to do in the event of the discovery of human remains.

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 2021).

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.

U.S. Department of Housing and Urban Development (HUD) Manufactured Home Construction and Safety Standards

The U.S. Department of Housing and Urban Development (HUD) Manufactured Home Construction and Safety Standards sets standards for the design, construction, transportation, fire safety, heat-producing, and electrical systems of manufactured homes to be used as residential units. These include energy conservation standards based on the most recent version of the International Energy Conservation Code. The standards take into consideration the design and factory construction techniques of manufactured homes, are based on the climate zones established by HUD (rather than those established under the International Energy Conservation Code), and provide alternative practices that result in net estimated energy consumption equal to or less than the specified 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.

Initial Study – Environmental Checklist

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 project would require the use of energy in the form of electricity, diesel fuel, and gasoline for worker and construction vehicles and equipment. The project would require limited construction activities and would be subject to state and local diesel idling restrictions and other equipment standards. Therefore, construction is not anticipated to result in wasteful, inefficient, or unnecessary consumption of energy resources. Further, Mitigation Measure AQ-1 has been included in Section III, *Air Quality*, to reduce diesel idling near sensitive receptors, which would further reduce the potential for wasteful, inefficient, or unnecessary consumption of energy resources.

Implementation of the proposed project would result in 10 new mobile home units, the construction of which would be regulated by the HUD Manufactured Home Construction and Safety Standards. The project would source energy from PG&E, which sources 50% of electricity from greenhouse gas-free or renewable resources, 4% from hydroelectric power, and 39% from nuclear resources (PG&E 2020). 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?

In order to comply 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 50% of electricity from greenhouse gas-free or renewable resources, 4% from hydroelectric power, and 39% from nuclear resources (PG&E 2020). 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 the HUD Manufactured Home Construction and Safety Standards Act, including energy conservation measures,, and is not anticipated to result in wasteful use of energy. Therefore, the project would comply with applicable energy efficiency plans and impacts would be *less than significant*.

Conclusion

The project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during short-term construction or long-term operation and would not conflict with state or local renewable energy or energy efficiency plans. Therefore, potential impacts related to energy would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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?	☐	☐	☒	☐

Initial Study – Environmental Checklist

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

Setting

The Alquist-Priolo Earthquake Fault Zoning 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 act identifies active earthquake fault zones and restricts building habitable structures over known active or potentially active faults. San Luis Obispo County is located in a geologically complex and seismically active region. The *County of San Luis Obispo General Plan Safety Element* identifies three active faults that traverse through the county and that are currently zoned under the act: the San Andreas, the Hosgri-San Simeon, and the Los Osos. The San Andreas Fault zone is located along the eastern border of San Luis Obispo County and has a length of over 600 miles. The Hosgri-San Simeon fault system generally consists of two fault zones: the Hosgri fault zone that is mapped off of the San Luis Obispo County coast; and the San Simeon fault zone, which appears to be associated with the Hosgri, and comes onshore near the pier at San Simeon Point. Lastly, the Los Osos Fault zone has been mapped generally in an east/west orientation along the northern flank of the Irish Hills.

The County Safety Element also identifies 17 other faults that are considered potentially active or have uncertain fault activity in the County. The County Safety Element establishes policies that require new development to be located away from active and potentially active faults, that the County enforce applicable building codes relating to seismic design of structures, and that the County require design professionals to

evaluate the potential for liquefaction or seismic settlement to impact structures in accordance with the Uniform Building Code.

The community of Los Osos is underlain by the Los Osos Fault zone (DOC 2015). In addition, the Cambria fault zone is located approximately 4 miles northeast, the Edna fault zone is located approximately 5 miles and the San Miguelito fault zone is located approximately 6 miles south of the project site (DOC 2015).

The County CZLUO identifies a Geologic Study Area (GSA) combining designation for areas where geologic and soil conditions could present new developments and their users with potential hazards to life and property. All land use permit applications for projects located within a GSA shall include a report prepared by a certified engineering geologist and/or registered civil/soils engineer, as appropriate. This report shall then be evaluated by a geologist retained by the county who is registered in the state of California. In addition, all uses within a GSA are subject to special standards regarding grading, distance from an active fault trace within an Earthquake Fault Zone, and erosion and geologic stability (CZLUO Section 23.07.080).

Groundshaking refers to the motion that occurs in response to local and regional earthquakes. Groundshaking can endanger life and safety due to damage or collapse of structures or lifeline facilities. The HUD Manufactured Home Construction and Safety Standards requires manufactured homes to be installed with foundation support and anchoring systems to withstand high seismic risk.

Liquefaction is the sudden loss of soil strength due to a rapid increase in soil pore water pressures resulting from groundshaking during an earthquake. Liquefaction potential increases with earthquake magnitude and groundshaking duration. Low-lying areas adjacent to creeks, rivers, beaches, and estuaries underlain by unconsolidated alluvial soil are most likely to be vulnerable to liquefaction. Based on the County Safety Element Maps, the project site is in an area with low and moderate potential for liquefaction.

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. Despite current codes and policies that discourage development in areas of known landslide activity or high risk of landslide, there is a considerable amount of development that is being impacted by landslide activity in the County each year. The County Safety Element identifies several policies to reduce risk from landslides and slope instability. These policies include the requirement for slope stability evaluations for development in areas of moderate or high landslide risk, and restrictions on new development in areas of known landslide activity unless development plans indicate that the hazard can be reduced to a less than significant level prior to beginning development. Based on the County's Safety Element Maps, the project site is located in an area with a low potential for landslide.

The classification of expansive soils relates to 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. The project site is underlain by Baywood Fine Sand, 2 to 9 percent slopes.

The County COSE identifies a policy for the protection of paleontological resources from the effects of development by avoiding disturbance where feasible. Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. The project site is located within the South Coast Range which is comprised of predominantly marine-derived Miocene and Pliocene-age sedimentary rocks.

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.

(a-ii) Strong seismic ground shaking?

The community of Los Osos, including the project site, is underlain by the Los Osos Fault zone (DOC 2015). In addition, there are several other potentially active and inactive fault zones located in the project region, including the Cambria fault zone, located approximately 4 miles northeast, the Edna fault zone, located approximately 5 miles south, and the San Miguelito fault zone, located approximately 6 miles south of the project site (DOC 2015). The Central Coast is a seismically active region and there is always potential for seismic groundshaking. The project would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to minimize the risk associated with the level of seismic ground shaking expected to occur in the project region. Although there is potential for fault rupture and ground shaking at the project site, based on required compliance with existing building standards, implementation of the project is not anticipated to result in the risk of loss, injury, or death. Therefore, potential impacts would be *less than significant*.

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

Based on the County Safety Element Liquefaction Hazards Map, the project site is located in an area with low potential for liquefaction. The project would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to address the site's potential for seismic-related ground failure, including liquefaction. Therefore, potential impacts related to the risk of loss, injury, or death due to liquefaction would be *less than significant.*

(a-iv) Landslides?

Based on the County Safety Element Landslide Hazards Map, the project site is located in an area with low potential for landslide risk. In addition, the project site is characterized by flat topography, which further reduces the risk for landslide to occur. The project would be required to comply with applicable sections of the HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to minimize the risk associated with landslide. Therefore, the project is not anticipated to result in the risk of loss, injury, or death as due to landslide and impacts would be *less than significant.*

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

The project site has been previously developed and the proposed project would not require a significant amount of earthwork, vegetation removal, grading, or excavation. The project site is located in the County's Municipal Stormwater Management Area (MS4) coverage area and must adhere to the Central Coast Post Construction Requirements (PCRs). As part of the MS4 process, construction BMPs would be applied to all work areas to reduce potential erosive runoff from construction activities. The proposed project would be subject to the Central Coast Regional Water

Quality Control Board (RWQCB) Construction Storm Water General Permit requirements for the development and preparation of a Stormwater Pollution Prevention Plan (SWPPP) with construction best management practices (BMPs) to reduce erosion during the construction period of the proposed project. Additionally, preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects (CZLUO 23.05.036) 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. Implementation of the project would result in ground disturbance; however, compliance with existing regulations would reduce potential impacts related to erosion and loss of topsoil to *less than significant*.

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

The project site is underlain by Baywood fine sand, 2 to 9 percent slopes (USDA 2021). This sandy soil is somewhat excessively well drained, has rapid permeability, and has very low runoff. The depth to water table is more than 80 inches (USDA 2021). As described above, the project site is located in an area with low and moderate risk for liquefaction and low risk for landslides. According to the USGS Areas of Land Subsidence in California Map, the project site is not located in an area of recorded land subsidence (USGS 2021). Therefore, impacts related to unstable soils are considered *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, soils with high shrink/swell potential are comprised of clay and clay materials. The project site is underlain by Baywood fine sand, 2 to 9 percent slopes, which has a soil profile that is comprised of sand (USDA 2021). Soils at the project site have low shrink/swell potential. Therefore, future development would not be located on expansive soil and *no impact* would occur.

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

The proposed project does not include the installation of new septic tanks or other on-site wastewater disposal systems; therefore, *no impacts* would occur.

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

Based on the Los Osos Community Plan Final Environmental Impact Report (EIR), the study area is underlain by old eolian deposits (County of San Luis Obispo 2020). This formation consists of fine-to-coarse sand and fine gravel and is often capped with well-developed soil. Previous fossil encounters in the area have been identified in alluvial deposits; eolian sediments are typically accumulated in depositional environments that are not generally favorable for fossil preservation. In addition, the project would not require substantial earthwork that may disturb paleontological resources. Therefore, impacts to paleontological resources would be *less than significant*.

Conclusion

The project site is not within the GSA combining designation or an area of high risk of landslide, liquefaction, subsidence, or other unstable geologic conditions. The project would be required to comply with HUD

Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 and standard CZLUO requirements which have been developed to properly safeguard against seismic and geologic hazards. Therefore, potential impacts related to geology and soils would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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

Carbon dioxide 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 ARB, transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

In March 2012, the SLOAPCD approved thresholds for Greenhouse Gas (GHG) emission impacts, and these thresholds have been incorporated into the CEQA Air Quality Handbook. The Bright-Line Threshold of 1,150 Metric Tons CO_2/year (MT CO_2e/yr) is the most applicable GHG threshold for most projects. Table 1-1 in the SLOAPCD CEQA Air Quality Handbook provides a list of general land uses and the estimated sizes or capacity of those uses expected to exceed the GHG Bight Line Threshold of 1,150 Metric Tons of carbon dioxide per year (MT CO_2/yr). Projects that exceed the criteria or are within ten percent of exceeding the criteria presented in Table 1-1 are required to conduct a more detailed analysis of air quality impacts.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to

contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

In October 2008, ARB published its *Climate Change Proposed Scoping Plan*, which is the State's plan to achieve GHG reductions in California required by Assembly Bill (AB) 32. The Scoping Plan included ARB-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 ARB to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. The initial Scoping Plan was first approved by ARB on December 11, 2008 and is updated every five years. The first update of the Scoping Plan was approved by the ARB 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 ARB 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.

The County Energy Wise Plan (EWP; 2011) identifies ways in which the community and County government can reduce greenhouse gas emissions from their various sources. Looking at the four key sectors of energy, waste, transportation, and land use, the EWP incorporates best practices to provide a blueprint for achieving greenhouse gas emissions reductions in the unincorporated towns and rural areas of San Luis Obispo County by 15% below the baseline year of 2006 by the year 2020. The EWP includes an Implementation Program that provides a strategy for actions with specific measures and steps to achieve the identified GHG reduction targets including, but not limited to, the following:

- Encourage new development to exceed minimum Cal Green requirements;
- Require a minimum of 75% of nonhazardous construction and demolition debris generated on site to be recycled or salvaged;
- Continue to implement strategic growth strategies that direct the county's future growth into existing communities and to provide complete services to meet local needs;
- Continue to increase the amount of affordable housing in the County, allowing lower-income families to live closer to jobs and activity centers, and providing residents with greater access to transit and alternative modes of transportation;
- Reduce potable water use by 20% in all newly constructed buildings by using the performance methods provided in the California Green Building Code;
- Require use of energy-efficient equipment in all new development;
- Minimize the use of dark materials on roofs by requiring roofs to achieve a minimum solar reflectivity index of 10 for high-slope roofs and 68 for low-slope roofs; and
- Use light-colored aggregate in new road construction and repaving projects adjacent to existing cities.

In 2016 the County published the EnergyWise Plan 2016 Update, which describes the progress made toward implementing measures in the 2011 EWP, overall trends in energy use and emissions since the baseline year

of the inventory (2006), and the addition of implementation measures intended to provide a greater understanding of the County's emissions status.

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.

Operational emissions would come primarily from vehicle trips to and from the project site and residential energy use. The 10 additional residential units onsite would result in a limited increase in daily vehicle trips (approximately 50) to and from the project site (SANDAG 2003). Energy for the project would be supplied by PG&E, which sources approximately 39% of electricity from renewable resources and an additional 47% 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.

(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 10 additional mobile home units and outdoor amenities within the RSF land use category.

Energy inefficiency contributes to higher GHG emissions which has the potential to 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 consist of community-wide measures and measures aimed at reducing GHG emissions associated with County operations. The GHG reduction measures contained in the EWP are generally programmatic and intended to be implemented at the community level. Measure No. 7 encourages energy efficient new development and provides incentives for new development to exceed CALGreen energy efficiency standards. The following is a summary of project consistency with the relevant supporting actions identified in Measure No. 7 for promoting energy efficiency in new development.

Supporting Action	Project Consistency
Require the use of energy-efficient equipment in all new development, including but not limited to Energy Star appliances, high-energy efficiency equipment, heat recovery equipment, and building energy management systems.	The project would be consistent with all HUD Manufactured Home Construction and Safety Standards energy conservation standards to ensure new development is energy efficient.

Encourage new projects to provide ample daylight within the structure through the use of lighting shelves, exterior fins, skylights, atriums, courtyards, or other features to enhance natural light penetration.	The project would be consistent with all HUD Manufactured Home Construction and Safety Standards energy conservation 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.	Parking areas would be limited in size.
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 installation of 10 new mobilehome units within the Residential Single Family 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 SB 350 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 VMT which is consistent with Scoping Plan strategies for reducing VMT 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

The project would not generate significant GHG emissions above existing levels and would not exceed any applicable GHG thresholds, contribute considerably to cumulatively significant GHG emissions, or conflict with plans adopted to reduce GHG emissions. Therefore, potential impacts related to GHG emissions would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

Initial Study – Environmental Checklist

Setting

The Hazardous Waste and Substances Site (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. Government Code section 65962.5 requires the California EPA to develop at least annually an updated Cortese List. Various state and local government agencies are required to track and document hazardous material release information for the Cortese List. The California Department of Toxic Substance Control's (DTSC's) EnviroStor database tracks DTSC cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination, such as federal superfund sites, state response sites, voluntary cleanup sites, school cleanup sites, school investigation sites, and military evaluation sites. The State Water Resources Control Board's (SWRCB's) GeoTracker database contains records for sites that impact, or have the potential to impact, water in California, such as Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program Sites. The remaining data regarding facilities or sites identified as meeting the "Cortese List" requirements can be located on the CalEPA website: https://calepa.ca.gov/sitecleanup/corteselist/.

The project would not be in an area of known hazardous material contamination and is not on a site listed on the Cortese List (SWRCB 2021; DTSC 2021). The closest site is a state cleanup site (Baywood Park Training Area (J09CA0031)), located approximately 1.7 miles southwest from the project site.

The California Health and Safety Code provides regulations pertaining to the abatement of fire related hazards and requires that local jurisdictions enforce the California Building Code, which provides standards for fire resistive building and roofing materials, and other fire-related construction methods. The County Safety Element provides a Fire Hazard Zones Map that indicates unincorporated areas in the County within moderate, high, and very high fire hazard severity zones. The project would be located within the Local Responsibility Area and is not in a fire hazard zone. Emergency response time to the project site is 5 minutes from CAL FIRE Station 15. For more information about fire-related hazards and risk assessment, see Section XX, Wildfire.

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

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.). Commonly used materials would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials, including those specified in CZLUO 23.06.120. Therefore, proposed construction activities are not anticipated to create a significant hazard to the public or the environment through 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 mobile home units 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?*

The project does not propose the handling or use of hazardous materials or volatile substances that would result in a significant risk of upset or accidental release conditions. As described above, 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 CZLUO 23.06.120 and other 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. Operation of the project would not require the handling or use of hazardous materials or volatile substances that would result in a significant risk of upset or accidental release conditions. Therefore, based on compliance with existing regulations during proposed construction activities, potential impacts would be *less than significant.*

(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 project site is located approximately 0.4 mile northeast of Monarch Grove Elementary school. The project site is not located within 0.25 mile of a proposed or existing school; therefore, the project does not have the potential to emit or handle hazardous materials within 0.25 mile of a school and *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?*

Based on a search of the DTSC EnviroStor database, the SWRCB Geotracker database, and CalEPA Cortese List website, there are no hazardous waste cleanup sites within or adjacent to the project site. Therefore, *no impacts* would occur.

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

The project site is not located within an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impacts* would occur.

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

The project would result in construction of 10 additional mobile home units and amenities within the Morro Shores MHP. Construction activities are not expected to require traffic controls or road closures and emergency access to the project site and surrounding areas would be maintained throughout construction. The project includes construction on an additional emergency access road that would connect the southwestern portion of the parcel to Ash Street, which would be constructed according to County Public Works and CALFIRE standards. In addition, other site improvements, including addressing, driveways, gates, etc., would be required to comply with CAL FIRE 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?

The project site and surrounding areas are located within a local responsibility area (LRA) and are not within or adjacent to a wildland area (CALFIRE 2021). Based on the County Safety Element, the project site is not located within a high or very high fire hazard severity zone. The project would be required to comply with all applicable fire safety rules and regulations, including the California Fire Code and Public Resources Code prior to issuance of building permits; therefore, potential impacts would be *less than significant.*

Conclusion

The project does not propose the routine transport, use, handling, or disposal of hazardous substances. It is not located in close proximity to any known contaminated sites. Project implementation would not subject people or structures to substantial risks associated with wildland fires and would not impair implementation of or interfere with any adopted emergency response or evacuation plans. Therefore, potential impacts related to hazards and hazardous materials would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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;	☐	☐	☒	☐

Initial Study – Environmental Checklist

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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 Central Coast Regional Water Quality Control Board (RWQCB) has established Total Maximum Daily Load (TMDL) thresholds for waterbodies within the county. A TMDL establishes the allowable amount of a particular pollutant a waterbody can receive on a regular basis and still remain at levels that protect beneficial uses designated for that waterbody. A TMDL also establishes proportional responsibility for controlling the pollutant, numeric indicators of water quality, and measures to achieve the allowable amount of pollutant loading. Section 303(d) of the Clean Water Act (CWA) requires states to maintain a list of bodies of water that are designated as "impaired". A body of water is considered impaired when a particular water quality objective or standard is not being met.

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

The U.S. Army Corps of Engineers (USACE), through Section 404 of the CWA, regulates the discharge of dredged or fill material into waters of the U.S., including wetlands. Waters of the U.S. are typically identified by the presence of an ordinary high water mark (OHWM) and connectivity to traditional navigable waters or

other jurisdictional features. The State Water Resources Control Board (SWRCB) and nine RWQCBs regulate discharges of fill and dredged material in California, under Section 401 of the CWA and the State Porter-Cologne Water Quality Control Act, through the State Water Quality Certification Program. State Water Quality Certification is necessary for all projects that require a USACE permit, or fall under other federal jurisdiction, or have the potential to impact waters of the State. Waters of the State are defined by the Porter-Cologne Act as any surface water or groundwater, including saline waters, within the boundaries of the state.

The project site is located within the Los Osos Area Subbasin of the Los Osos Valley Groundwater Basin, which is a low-priority subbasin under the Sustainable Groundwater Management Act (SGMA) (Basin No. 3-08.01) but is adjudicated and considered in critical overdraft per the Department of Water Resources (DWR) Bulletin 118. The SGMA does not apply to the Los Osos Area subbasin because requirements have been met by the Los Osos Basin Management Committee (County of San Luis Obispo 2021b).

Water for urban uses in the County is obtained from either surface impoundments such as Santa Margarita Lake, Whale Rock, and Lopez reservoirs, or from natural underground basins (aquifers). In October 2015, the County Board of Supervisors adopted a resolution which established the Countywide Water Conservation Program (CWWCP) in response to the declining water levels in the Nipomo Mesa subbasin of the Santa Maria Groundwater Basin, Los Osos Groundwater Basin, and the Paso Robles Groundwater Basin (PRGWB). A key strategy of the CWWCP is to ensure that all new construction or new or expanded agriculture will be required to offset its predicted water use by reducing existing water use on other properties within the same water basin. Each of the three groundwater basin areas have specific policies that apply.

The County CZLUO dictates which projects are required to prepare a drainage plan, including projects that would, for example, involve a land disturbance of more than 40,000 square feet, would result in an impervious surface of more than 20,000 square feet, or involves development on slopes steeper than 10 percent. The County CZLUO also dictates than an erosion and sedimentation control plan is required year-round for all construction and grading permit projects and any site disturbance activities of 0.5 acre or more in geologically unstable areas, on slopes of steeper than 30 percent, on highly erodible soils, or within 100 feet of any watercourse.

Per the County's Stormwater Program, the Public Works Department is responsible for ensuring that new construction sites implement best management practices during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1.0 acre or more must obtain coverage under the SWRCB's Construction General Permit. The Construction General Permit requires the preparation of a Stormwater Pollution Prevention Plan (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 San Luis Obispo County CZLUO.

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

Federal Emergency Management Act (FEMA) regulations. The County Land Use Ordinance designates a Flood Hazard (FH) combining designation for areas of the County that could be subject to inundation by a 100-year flood or within coastal high hazard areas. Development projects within this combining designation are subject to FH permit and processing requirements, including, but not limited to, the preparation of a drainage plan, implementation of additional construction standards, and additional materials storage and processing requirements for substances that could be injurious to human, animal or plant life in the event of flooding. The project site is not located within a Flood Hazard combining designation. There are no surface water features within or adjacent to the project site.

Discussion

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

The project site is located on relatively flat land and has been previously disturbed for development of the Morro Shores MHP. There are no surface water features within or adjacent to the project site. Based on the previously developed nature of the project site, the proposed project would require minimal grading and vegetation removal. Proposed construction activities have the potential to temporarily increase erosion and pollution at the site. The project site is located within the MS4 coverage area and must adhere to the Central Coast PCRs. The proposed project would be subject to the Central Coast RWQCB Construction Storm Water General Permit requirements for the development and preparation of a SWPPP with construction BMPs to reduce erosion during construction of the proposed project. Preparation and implementation of an Erosion and Sedimentation Control Plan is required for all construction and grading projects to minimize potential impacts related to erosion, sedimentation, and siltation (CZLUO 23.05.036). The plan is required to be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Equipment used during project construction has the potential to increase pollutant runoff from the project site. BMPs and other equipment regulations would be implemented through the SWPPP and the Erosion and Sedimentation Control Plan during project construction to ensure erosive and pollutant runoff is minimized during construction. Implementation of the project would result in minimal ground disturbance and compliance with existing regulations would further reduce potential impacts related to water quality to *less than significant*.

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

The project would construct 10 additional mobile home units, associated improvements, and new amenities, which would result in an additional 20,545 sf (0.47 acre) of impervious surface area to the project site. The project site would maintain pervious surface through landscape design, installation of pervious pavers within proposed driveways, and outdoor recreation amenities. The project also includes implementation of an on-site retention-based infiltration system through installation of a retention basin located in the northwestern portion of the proposed project area. Implementation of proposed stormwater control measures would ensure long-term groundwater recharge at the site.

The project site is located within the Los Osos Area Subbasin of the Los Osos Valley Groundwater Basin, which is a low-priority subbasin under SGMA (Basin No. 3-08.01). According to the County, the SGMA does not apply to the Los Osos Area subbasin because requirements have been met by the

Los Osos Basin Management Committee (County of San Luis Obispo 2021b). The County estimates the potable water demand for new single-family dwellings in Los Osos to be 150 gallons per day, which would be provided by Golden State Water Company.

On April 22, 2008, the Board of Supervisors approved two plumbing retrofit ordinances for the Los Osos area. The ordinances address sea water intrusion into the lower aquifer zone of the Los Osos Groundwater Basin. To manage this serious problem, the ordinances require both new and existing development to help address this problem by retrofitting older, non-conserving fixtures with those that are water efficient. These Title 19 retrofit requirements require 2:1 off-set of new water demand for covered development.

The required Title 19 offset for a single-family dwelling is 300 gallons per day (2:1 offset). Mobile homes are estimated to use 50 percent of the estimated demand of single-family residences (75 gallons per day) and would result in a 2:1 offset of 150 gallons per day (RRM Design Group 2020). The additional 10 units would increase the water use of the park by an estimated 750 gallons per day over the existing conditions for potable water use, and 527 gallons per day for landscape watering.

The project is not subject to Title 19 requirements because the water conservation standards are required with County building permits and mobile homes are permitted by the Department of Housing and Community Development. However, to address the concerns of the community and the Los Osos Community Advisory Council, the applicant has voluntarily agreed to retrofit the project's water use at a 2:1 ratio.

The applicant proposes to offset the water demand of the mobile homes and landscaping by retrofitting existing washing machines within the park, outside of the Title 19 program. The applicant conducted a survey of residents in March of 2021 and in June of 2021 the results were compiled which indicated 164 mobile home occupants were surveyed, 152 responses were received, and 98 mobile home occupants indicated interested in participating in washing machine retrofits. The Title 19 program assigns a credit of 35 to 70 gallons per washing machine. Assuming a conservative calculating using 35 gallons per washing machine, the applicant would retrofit at least 73 mobile homes to meet the proposed 2:1 offset. Therefore, the project would not interfere with a groundwater management plan and impacts would be *less than significant*.

(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?

Minimal grading activity is required for construction of the proposed project and would not result in the permanent alteration of drainage patterns on-site. The proposed project would be subject to the Central Coast RWQCB Construction Storm Water General Permit requirements for the development and preparation of a SWPPP with construction BMPs to reduce erosion during construction of the proposed project. In addition, preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects to minimize potential impacts related to erosion, sedimentation, and siltation (CZLUO 23.05.036). The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project site is located within the County's MS4 coverage area and the project must adhere to the Central Coast PCRs. Following construction of the project, undeveloped areas of the site would be covered in

hardscapes which would reduce long-term erosion at the site. Additionally, stormwater control measures would be implemented at the site to control long-term stormwater runoff, including maintaining pervious areas (i.e., landscaping), implementing pervious pavers within proposed driveways, and implementing an on-site retention basin. Operation of the project is not anticipated to substantially alter drainage patterns or increase impervious surface areas in a manner that would increase erosion or siltation on- or off-site. Compliance with existing regulations would reduce impacts related to sedimentation and erosion that could runoff from work areas; therefore, impacts would be *less than significant*.

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

The project would not substantially increase the amount of impervious surface area or the rate or volume of surface runoff in a manner that could result in flooding on- or off-site. The project includes implementation of stormwater control measures within the site, including implementation of pervious landscape design, pervious pavers, and an on-site retention basin to control long-term stormwater runoff at the site. In addition, the project applicant would be required to comply with CZLUO and Regional Water Quality Control Board requirements regarding drainage, sedimentation, and erosion control. A SWPPP and Erosion and Sedimentation Control Plan would be required and would need to show that increased surface runoff would not have more impacts than those caused by historic flows. No additional measures beyond compliance with the Central Coast RWQCB Construction Storm Water General Permit requirements and CZLUO 23.05.036 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 construction of an additional 0.47 acre of impervious surface area onsite and would maintain pervious surface where feasible through landscape design, installation of pervious pavers within proposed driveways, and outdoor recreation amenities. Therefore, the project would not substantially increase the amount of impervious surface area or the rate or volume of surface runoff in a manner that could exceed the capacity of existing stormwater or drainage systems. Based on the nature and size of the project, changes in surface hydrology would be negligible. Therefore, potential impacts related to increased surface runoff exceeding stormwater capacity would be *less than significant.*

(c-iv) Impede or redirect flood flows?

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

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

Based on the County Safety Element, the project site is not located within a 100-year flood zone or within an area that would be inundated if dam failure were to occur. Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami (DOC 2019). The project site is not located within or adjacent to a standing

body of water with the potential for a seiche to occur. Therefore, the project site has no potential to release pollutants due to project inundation and *no impacts* would occur.

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

The project is not located within a groundwater basin designated as Level of Severity III per the County's Resource Management System or in severe decline by SGMA. As identified above, based on required compliance with the County's CZLUO and the Central Coast RWCQB construction stormwater permit requirements and PCRs, the project would not substantially increase water demand, deplete groundwater supplies, or interfere substantially with groundwater recharge. Therefore, the project would not conflict with the Central Coastal Basin Plan, SGMA, or other local or regional plans or policies intended to manage water quality or groundwater supplies; therefore, impacts would be *less than significant.*

Conclusion

The project site is not within the 100-year flood zone and does not include existing drainages or other surface waters. The project would not substantially increase impervious surfaces and does not propose alterations to existing water courses or other significant alterations to existing on-site drainage patterns. Therefore, potential impacts related to hydrology and water quality would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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 California Coastal Commission is the ultimate permit authority in the Coastal Zone of San Luis Obispo County and dictates how the County's Local Coastal Program (Title 23) is interpreted. The purpose of Title 23, also known as the County CZLUO, is to guide and manage the future growth in accordance with the County General Plan and Local Coastal Program; to regulate land use in a manner that will encourage and support orderly development and beneficial use of lands; to minimize adverse effects on the public resulting

from inappropriate creation, location, use or design of buildings or land uses: and to protect and enhance significant natural, historic, archeological and scenic resources within the county.

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 grown 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 as Public Facilities land use.

Discussion

(a) Physically divide an established community?

The project includes construction of an additional 10 mobile home units within the existing mobile home park. The project does not propose components that would physically divide the site from surrounding areas and uses. The project would be consistent with the general level of existing residential development in the project vicinity and would not create, close, or impede any existing public or private roads, or create any other barriers to movement or accessibility within the community. Therefore, the proposed project would not physically divide an established community and *no impacts* would occur.

(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 existing land use designation and the guidelines and policies for development within the applicable area plan, Coastal Zone Framework for Planning, and the COSE. The project was found to be consistent with standards and policies set forth in the County of San Luis Obispo General Plan, the Estero Area Plan, the SLOAPCD CAP, and other land use policies for this area.

The Los Osos Community Plan (LOCP) was adopted by the County in December 2020 and is awaiting review and certification by the California Coastal Commission. Key components of the LOCP include incorporating conditions of approval of the Coastal Development Permit from the California Coastal Commission for the Los Osos Wastewater Project. Specifically, Special Condition 6 prohibits wastewater service to undeveloped properties within the service area, until the County's Local Coastal Plan (via the LOCP) is amended to identify appropriate and sustainable buildout limits. The project site is not an undeveloped property; it is a single legal parcel that is currently developed with 164 mobile homes and ancillary improvements. The addition of 10 new mobile homes that would be allowed by this project would be an addition to an existing development and therefore would not be in conflict with Special Condition 6, or other conditions of the Los Osos Wastewater Project.

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

Conclusion

The project would not divide an established community. The project would be required to implement measures to mitigate potential impacts associated with air quality, biological resources, cultural resources, and noise. Therefore, 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.

Mitigation

Implement Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1.

XII. MINERAL RESOURCES

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

Setting

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

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

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

The County CZLUO 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 PRC Sections 2710 et seq. (SMARA); and,
3. Major public utility electric generation facilities exist or are proposed.

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

Discussion

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

The project site is not located within or adjacent to an Extractive Resource Area or Energy/Extractive Area. The project includes minimal ground disturbance activity for the construction of the proposed project; therefore, work within previously disturbed areas and is not anticipated to uncover mineral resources in the area and no impacts would occur.

(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?

Chapter 6 of the COSE identifies goals and policies regarding mineral resources in the county. Policies within this chapter protect mineral resources within identified extractive areas identified in the *County of San Luis Obispo General Plan Land Use Element*. The project site is not located within or adjacent to an Extractive Resource Area or Energy/Extractive Area. The project includes minimal grading activity and work within previously disturbed areas. Therefore, the project is not anticipated to uncover mineral resources in the area; therefore, *no impacts* would occur.

Conclusion

The project site is not located with an Extractive Resource Area or Energy/Extractive Area and impacts to mineral resources are not anticipated to occur; therefore, mitigation measures are not necessary.

Mitigation

None required.

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 San Luis Obispo County Noise Element of the 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, 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 (dB). A-weighting de-emphasizes the very low and very high frequencies of sound in a manner similar to the human ear.

The County CZLUO noise standards are not applicable to a range of exceptions, including noise sources associated with construction, provided such activities do not take place before 7:00 a.m. or after 9:00 p.m. on weekdays, or before 8:00 a.m. or after 5:00 p.m. on Saturday or Sunday. Noise associated with agricultural land uses as listed in Section 22.06.030 and traffic on public roadways, railroad line operations, and aircraft in flight are also exempt.

The nearest off-site sensitive receptors are single-family residences located approximately 50 feet west of the project site.

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?*

During construction of the project, noise generated from construction activities may intermittently dominate the noise environment in the immediate area. Surrounding land uses include residential units to the west, open space and residential units to the south and east, and mobile home units and the Sweet Springs Natural Preserve to the north. The nearest off-site sensitive receptors are single-family residences located approximately 50 feet west of the project site. Construction activities would be limited in nature and consistent with other projects in the county; however, construction activities would be located in close proximity to residential units and associated noise would have the potential to affect the nearby sensitive receptors. Table 1 details the typical noise levels for construction equipment likely to be used in implementation the project.

Table 1. Typical Noise Levels for Construction Equipment

Equipment	Typical Noise Level (dBA)* 50 Feet from Source
Backhoes, excavators	80–85
Concrete pumps, mixers	82–85
Cranes (moveable)	81
Pick-up truck	55
Dump truck	76
Equipment/tool van	55
Dozer	82
Compactors	82
Water truck	76

Equipment	Typical Noise Level (dBA)* 50 Feet from Source
Grader	85
Drill rigs	70–85
Pneumatic tools	85
Rock transport	76
Roller	80
Hole auger	84
Line truck and trailer	55

*dBA = A-weighted decibels

Source: U.S. Environmental Protection Agency (USEPA) 1971.

CZLUO 23.06.042.d states that noise related to construction activities should take place between 7:00 a.m. and 9:00 p.m. (Monday–Friday) and between 8:00 a.m. and 5:00 p.m. (Saturday–Sunday). Noise associated with construction activities taking place during these hours are exempt from the County's noise standards. The project would be required to comply with the County's CZLUO for construction timing. Due to the close proximity of nearby residential uses and typical noise levels of construction activities, Mitigation Measure N-1 has been identified to reduce the potential temporary construction noise impacts to surrounding residential uses; therefore, impacts would be *less than significant with mitigation*.

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

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

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

The project site is not located within or adjacent to an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impact* would occur.

Conclusion

Short-term construction activities would be limited in nature and duration and conducted during daytime periods consistent with County CZLUO standards. Due to the proximity of sensitive receptors, Mitigation Measure N-1 has been included to reduce impacts related to short-term construction noise. No long-term operational noise or ground vibration would occur as a result of the project. Therefore, potential impacts related to noise would be less than significant.

Mitigation

N-1 **Noise Reduction Measures.** For the entire duration of the construction phase of the project, the following BMPs shall be adhered to:

1. Stationary construction equipment that generates noise that exceeds 50 dB daytime or 45 dB nighttime outside of between 7:00 a.m. and 9:00 p.m. (Monday–Friday) and 8:00 a.m. and 5:00 p.m. (Saturday–Sunday) at the project boundaries shall be shielded with the most modern noise control devices (i.e., mufflers, lagging, and/or motor enclosures).
2. Impact tools (e.g., jack hammers, pavement breakers, rock drills, etc.) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.
3. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used.
4. All construction equipment shall have the manufacturers' recommended noise abatement methods installed, such as mufflers, engine enclosures, and engine vibration insulators, intact and operational.
5. All construction equipment shall undergo inspection at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shrouding, etc.).

XIV. POPULATION AND HOUSING

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

Setting

The County of San Luis Obispo General Plan Housing Element recognizes the difficulty for residents to find suitable and affordable housing within San Luis Obispo County. The County Housing Element includes an analysis of vacant and underutilized land located in urban areas that are suitable for residential development and considers zoning provisions and development standards to encourage development of

these parcels. These parcels are categorized into potential sites for very low and low-income households, moderate income households, and above moderate income households.

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

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 the construction of 10 new single-story mobile home units with accompanying improvements and new neighborhood amenities to an existing 29.99-acre parcel that currently contains 164 existing mobile home residential units. Implementation of the project would result in infill development of 10 new mobile home units. Based on the Estero Area Plan, the average household size in the community of Los Osos is 2.44 persons per occupied dwelling unit; therefore, development of 10 new mobile home units would result in a marginal population increase of approximately 25 residents (County of San Luis Obispo 2009). The project does not include any new uses that would increase employment in the area. Therefore, the project would not result in substantial unplanned population growth and impacts would be *less than significant*.

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

The project would not displace existing housing or necessitate the construction of replacement housing elsewhere; therefore, *no impacts* would occur.

Conclusion

No significant impacts related to population and housing would occur; therefore, mitigation measures are not necessary.

Mitigation

None required.

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 the CAL FIRE, which has been under contract with the County of San Luis Obispo 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 to 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. The project would be served by CAL Fire/South Bay Station #15, located approximately 0.75 mile southeast of the project site at 2315 Bayview Heights Dr, Los Osos. Emergency response to the project site is less than 5-10 minutes (County of San Luis Obispo 2022).

Police protection and emergency services in the unincorporated portions of the county are provided by the San Luis Obispo County Sheriff's Office. The Sheriff's Office Patrol Division responds to calls for service, conducts proactive law enforcement activities, and performs initial investigations of crimes. Patrol personnel are deployed from three stations throughout the county, the Coast Station in Los Osos, the North Station in Templeton, and the South Station in Oceano. The nearest police station is the Morro Bay Police Department, located approximately 3.3 miles north of the project site at 850 Morro Bay Boulevard in Morro Bay. Emergency response to the project site is less than 5-10 minutes (County of San Luis Obispo 2022).

San Luis Obispo County has a total of 12 school districts that currently enroll approximately 34,000 students in over 75 schools. The project site is located within the San Luis Coastal Unified School District (SLCUSD). Based on the County's 2016-2018 Resource Summary Report, schools within the San Luis Coastal Unified School District are currently operating at acceptable capacities and levels (County of San Luis Obispo 2018).

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. The project is located approximately 0.2 mile south of the Morro Coast Audubon Society's Sweet Springs Nature Preserve. This 23-acre preserve is managed by the Audubon Society and offers hiking trails, views of Morro Bay and Morro Rock and birding opportunities. Coastal access to Morro Bay is to the north of the project site from northwest to northeast at the following locations: Lupine Street, Doris Avenue, and Sweet Springs Nature Preserves. The Los Osos Community Park is located approximately 0.4 mile southeast of the project site. There is an existing park located within the mobile home park between Loma Street and Henrietta Avenue.

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 (State Government Code 65995 et seq.). The fee amounts are assessed annually by the County based on the type of proposed development and the development's proportional impact and are collected at the time of building permit issuance. Public facility fees are used as needed to finance the construction of and/or improvements to public facilities required to the serve new development, including fire protection, law enforcement, schools, parks, and roads.

Discussion

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

Fire protection?
The proposed project would result in a marginal increase in population of approximately 25 new residents as a result of infill development of 10 new mobile home units that would result in a slight increase in demand on fire protection services. The project would be served by existing fire protection services and would not result in the need for new or altered fire protection services or facilities. In addition, the project would be subject to development impact fees to offset the project's contribution to demand for fire protection services. Therefore, impacts would be *less than significant.*

Police protection?
The proposed project would result in a marginal increase in population of approximately 25 residents as a result of infill development of 10 new mobile home units that may slightly increase 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. In addition, the project would be subject to development impact fees to offset the project's contribution to demand on law enforcement services. Therefore, impacts related to police services would be *less than significant.*

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

Parks?
The project includes development of outdoor neighborhood amenities, including a new dog park, artificial turf putting green, shade structures, and seating areas to serve the Morro Shores MHP. As discussed in Section XIV, Population and Housing, the project would not induce a substantial increase in population growth and would not result in the need for additional parks or recreational services or facilities to serve new populations. Therefore, potential impacts would be *less than significant.*

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

Conclusion

The project does not propose development that would substantially increase demands on public services and would not directly or indirectly induce substantial population growth that would increase demands on public services. The project would be subject to payment of development impact fees to reduce the project's negligible contribution to increased demands on public services and facilities. Therefore, potential impacts related to public services would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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?	☐	☒	☐	☐

Initial Study – Environmental Checklist

Setting

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

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

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

Discussion

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

The project would not result in substantial population growth and would not substantially increase demand on any proximate existing neighborhood, regional park, or other recreational facilities. The marginal increase in population may slightly increase demand on local and regional recreational facilities; however, the project would be required to pay 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 includes the construction of new outdoor recreational amenities within the Morro Shores MHP, including a dog park, an artificial turf putting green, shade structures, and seating areas. As discussed throughout this IS/MND, implementation of the proposed project has the potential to result in environmental impacts. Mitigation has been included in individual resource sections to ensure potential environmental impacts associated with development of the project are mitigated to a less-than-significant level. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1 to reduce potential environmental impacts associated with the development of proposed recreational amenities. Therefore, impacts would be *less than significant with mitigation*.

Conclusion

The project would not result in a significant increase in use of parks or recreational facilities. The project would develop additional outdoor recreational amenities within the project area. Therefore, with implementation of the required mitigation, potential impacts related to recreation would be less than significant.

Mitigation

Implement Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1.

XVII. TRANSPORTATION

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

Setting

The *County of San Luis Obispo Land Use and Circulation Element* (LUCE) establishes goals, objectives, and policies to be implemented throughout the County CZLUO area.

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 within the county 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 South County Circulation Study, Los Osos Circulation Study, Templeton Circulation Study, San Miguel Circulation Study, Avila Circulation Study, and North Coast Circulation Study. Caltrans maintains annual traffic data on state highways and interchanges within the county.

In 2013 SB 743 was signed 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 the State CEQA Guidelines Update package. This package included the guidelines section implementing SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis effective July 1, 2020.

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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, preparation of a Regional Transportation Plan (RTP), programming of state funds for transportation projects, and the administration and allocation of transportation development act funds required by state statutes. As the Metropolitan Planning Organization (MPO), SLOCOG is also responsible for all transportation planning and programming activities required under federal law. This includes development of long-range transportation plans and funding program, and the section and approval of transportation projects using federal funds.

The 2019 RTP, which was adopted in June 2019, is a long-term blueprint of San Luis Obispo County's transportation system. The plan identifies and analyzes transportation needs of the metropolitan region and creates a framework for project priorities. As the MPO for the region, SLOCOG represents and works with the County and Cities within the county in facilitating the development of the RTP.

The County Department of Public Works establishes bicycle paths and lanes in coordination with the RTP, which outlines how the region can establish an extensive bikeway network. County bikeway facilities are funded by state grants, local general funds, and developer contributions. The RTP also establishes goals and recommendations to develop, promote, and invest in the public transit systems, rail systems, air services, harbor improvements, and commodity movements within the county in order to meet the needs of transit-dependent individuals and encourage the increasing use of alternative modes by all travelers that choose public transportation. Local transit systems are presently in operation in the cities of Morro Bay and San Luis Obispo and in South County, offering service to Grover Beach, Arroyo Grande, Pismo Beach, and Oceano. Dial-a-ride Systems provide intra-community transit in Morro Bay, Atascadero, and Los Osos. Inter-urban systems operate between the city of San Luis Obispo and South County, Los Osos, and the North Coast.

The County LUCE 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. The project is located along Ramona Avenue. Existing access to the project site is located off of Ramona Avenue and Broderson Avenue.

Discussion

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

The County's LUCE and SLOCOG's 2019 RTP includes goals, policies, and ordinances to facilitate consistency between transportation and land use planning and encourages the use of alternative methods of transportation to reduce vehicle trips throughout the region. The project consists of infill development within an existing mobile home park that would result in 10 additional mobile home units within the RSF land use category. 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. There is a transit stop located on Pine Avenue, approximately 520 feet west of the project site. There is commercial development, including grocery stores and restaurants, located within one mile of the project site. The accessibility of transit and commercial areas may encourage the use of alternative modes of transportation, which is consistent with the County's LUCE and the 2019 RTP. In addition, the age demographic of the mobile home park is 55 and older; therefore, a significant number of additional vehicle trips is not anticipated, which is consistent with regional VMT reduction strategies. Additionally, the project would be subject to road improvement fees for maintenance of nearby

county roads and transportation facilities. The project would be consistent with the County's LUCE and the 2019 RTP; 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 VMT Program (Transportation Impact Analysis Guidelines; Rincon, October 2020 & VMT Thresholds Study; GHD, March 2021). The VMT Program provides interim operating thresholds and includes a screening tool for evaluating VMT impacts. Based on the limited number of proposed mobile home units, the project would generate less than 110 trips per day, which is the suggested screening threshold identified in the State guidance (Technical Advisory on Evaluating Transportation Impacts in CEQA; Office of Planning & Research, December 2018). Therefore, impacts would be *less than significant*.

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

The project would create a new access route from Ash Street in the southwestern portion of the property to allow residents of the mobile home parks to access the project site. The project does not include components that would facilitate incompatible uses (e.g., farm equipment) along proposed or nearby roads that could increase hazards. The project also includes the development of access driveways for proposed mobile home units and surface parking areas. The access route, driveway design, and parking lots would be required to comply with County Public Works and CAL FIRE engineering and design requirements for proper development. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be *less than significant*.

(d) Result in inadequate emergency access?

The project would not result in road closures during short-term construction activities or long-term operation. Emergency access to the project site and adjacent properties would be maintained throughout construction. The project would provide additional access to the site from Ash Street. Therefore, project implementation would not result in inadequate emergency access and impacts would be *less than significant*.

Conclusion

The project would not alter existing transportation facilities or result in a substantial number of additional vehicle trips or VMT. The project would not interfere with short- or long-term emergency access or create hazards through road or other project component design. Payment of standard development fees and compliance with existing regulations would ensure potential impacts are reduced to less than significant. Therefore, potential impacts related to transportation would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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 California Register of Historical Resources; or
    b. Included in a local register of historical resources as defined in subdivision (k) of California Public Resources Code Section 5020.1.

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

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

Discussion

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

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

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

The project would require limited ground disturbance for implementation of the proposed project, which reduces the potential to uncover unknown tribal cultural resources if located within the project site. Since the project site is located in an archaeologically sensitive area, Mitigation Measure CR-1 would require the development of an Archaeological Monitoring Plan (AMP) and associated archaeological monitoring procedures during initial ground-disturbing activities. The AMP would appropriately identify and address archaeological finds encountered during construction monitoring and would include measures to avoid or reduce potential impacts to cultural resources. Additionally, the project would be required to comply with the protocol identified in CZLUO Section 23.07.104 - Archaeologically Sensitive Areas and California Health and Safety Code Section 7050.5 for inadvertent discovery of human remains. Implementation of Mitigation Measure CR-1 and compliance with California Health and Safety Code Section 7050.5 would ensure impacts to tribal cultural resources, including human remains, are avoided and minimized.

The County has provided notice of the opportunity to consult with appropriate tribes per the requirements of AB 52, and no consultation requests were received and no information about known tribal cultural resources that have been listed or been found eligible for listing in the California Register of Historical Resources were identified.

Therefore, implementation of Mitigation Measures CR-1 would reduce project impacts on tribal cultural resources to *less than significant with mitigation*.

Conclusion

The project site is located in an archaeologically sensitive area and has potential to support unknown tribal cultural resources. Implementation of Mitigation Measure CR-1 would reduce impacts to those resources. Therefore, impacts would be reduced to a level that is considered less than significant with implementation of the identified mitigation measures.

Mitigation

Implement Mitigation Measure CR-1.

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?	☐	☐	☒	☐

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Setting

The County Public Works Department provides water and wastewater services for specific County Service Areas (CSAs) that are managed through issuance of water/wastewater "will serve" letters. The County Public Works Department 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 onsite 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 Public Works Department is responsible for ensuring that new construction sites implement best management practices 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 Southern California Gas Company provide natural gas services for urban and rural communities within the county of San Luis Obispo.

There are three landfills in San Luis Obispo County: Cold Canyon Landfill, located near the City of San Luis Obispo, Chicago Grade Landfill, located near the community of Templeton, and Paso Robles Landfill, located east of the City of Paso Robles. The project would be served by Mission Country Disposal.

Discussion

(a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?*

The project would require the extension of existing utility infrastructure, including gas, electrical, water, and sewer lines to connect to existing utility infrastructure within the Morro Shores MHP. As evaluated throughout this IS/MND, implementation of the proposed project has the potential to result in environmental impacts. Mitigation has been included in individual resource sections to ensure potential environmental impacts associated with development of the project are mitigated to a less-than-significant level. Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1 have been included to reduce potential environmental impacts associated with the expansion and installation of utility infrastructure to serve the project. Therefore, 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?*

The project site is located within the Los Osos Area Subbasin of the Los Osos Valley Groundwater Basin, which is a low-priority subbasin under SGMA (Basin No. 3-08.01). SGMA does not apply to the Los Osos Area subbasin because requirements have been met by the Los Osos Basin Management Committee (County of San Luis Obispo 2021b). The County estimates the average water usage for a new single-family dwelling in Los Osos to be 150 gallons per day. Mobile homes are estimated to use 50 percent of the water used by single-family residences (75 gallons per day) (RRM Design Group 2020). The estimated water demand associated with the proposed 10 new mobile home units would increase the potable water demand of the mobile home park by an estimated 750 gallons per day compared to existing conditions.

On April 22, 2008, the Board of Supervisors approved two plumbing retrofit ordinances for the Los Osos area. The ordinances address sea water intrusion into the lower aquifer zone of the Los Osos Groundwater Basin. To manage this serious problem, the ordinances require both new and existing development to help address this problem by retrofitting older, non-conserving fixtures with those that are water efficient. These Title 19 retrofit requirements require 2:1 off-set of new water demand for covered development. The project is not subject to Title 19 requirements because the water conservation standards are required with County building permits and mobile homes are permitted by the Department of Housing and Community Development. However, to address the concerns of the community and the Los Osos Community Advisory Council, the applicant has voluntarily agreed to retrofit at a 2:1 ratio.

The applicant proposes to offset the water demand of the mobile homes by retrofitting existing washing machines within the park, outside of the Title 19 program. The applicant conducted a survey of residents in March of 2021 and in June of 2021 the results were compiled which indicated 164 mobile home occupants were surveyed, 152 responses were received, and 98 mobile home occupants indicated interested in participating in washing machine retrofits. The Title 19 program assigns a credit of 35 to 70 gallons per washing machine. Assuming a conservative calculating using 35 gallons per washing machine, the applicant would need to retrofit at least 73 mobile homes to meet. The project would be provided water by Golden State Water Company (GSWC), which would be able to provide domestic and fire protection water service to the proposed project (GSWC 2020). The project would not result in the expansion or development of new water supply infrastructure and existing GSWC facilities and supply would be capable of serving the project. Therefore, potential impacts would be *less than significant*.

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

The project would be served by the County of San Luis Obispo Water Assessment District Number 1 (Los Osos Wastewater Treatment Plant), which has adequate ability to provide sewage disposal for the project (Holder 2020). Therefore, potential impacts would be *less than significant*.

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

Solid waste, recycling, and green waste services would be provided by Mission Country Disposal and waste materials would be disposed of at the Cold Canyon Landfill. The Cold Canyon Landfill has an expected closure 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 in 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, in addition to waste already generated by the mobile home park, 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
Residential	12.23	lb/household/day	10 units	122.3 lbs/day
			Total	**122.3 lbs/day**

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

Conclusion

Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1 would be required to avoid or reduce potential impacts related to installation of expanded utility infrastructure. The project would not result in significant increased demands on water, wastewater, or stormwater infrastructure and facilities. The project would not result in a substantial increase in solid waste generation. Therefore, potential impacts related to utilities and service systems would be less than significant.

Mitigation

Implement Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1.

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?	☐	☐	☒	☐

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
(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 roughly from May through October, however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. Fire Hazard Severity Zones (FHSZ) are defined by the California Department of Forestry and Fire Protection (CALFIRE) based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the County have been designated as "Very High," "High," or "Moderate." In San Luis Obispo County, most of the area that has been designated as a "Very High Fire Hazard Severity Zone" is located in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San Luis Obispo County. The Moderate Hazard designation does not mean the area cannot experience a damaging fire; rather, it indicates that the probability is reduced, generally because the number of days a year that the area has "fire weather" is less than in high or very high fire severity zones. The project site is located in a local responsibility area (LRA) and is not within a designated FHSZ (CALFIRE 2021). Based in the County's Safety Element Maps, the project site is not located within or adjacent to wildland areas.

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

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

The County has prepared an Emergency Operations Plan (EOP) to outline the emergency measures that are essential for protecting the public health and safety. These measures include, but are not limited to, public alert and notifications, emergency public information, and protective actions. The EOP also addresses policy and coordination related to emergency management.

Discussion

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

The project would result in the construction of 10 additional mobile home units and amenities within the Morro Shores MHP. Construction activities are not expected to require traffic controls or road closures and emergency access to the site and surrounding areas would be maintained throughout construction. The project includes construction on an additional emergency access road that would connect the southwestern portion of the parcel to Ash Street, which would be constructed according to County Public Works and CAL FIRE standards. In addition, other site improvements, including addressing, driveways, gates, etc., would be required to comply with CAL FIRE requirements and would be subject to plan approval; 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 project site is generally flat and does not contain substantial vegetation. Proposed uses would not significantly increase or exacerbate potential fire risks and the project does not propose any design elements that would exacerbate risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, potential impacts would be *less than significant*.

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

The project would result in the construction of 10 additional mobile home units, outdoor amenities, extended utility infrastructure, and an additional emergency access route to the project site. The project does not propose the installation of infrastructure that could exacerbate fire risk in the area. Proposed development would comply with applicable County, California Fire Code, and PRC standards and regulations. The project does not propose any utility features that would increase fire risk to the area; 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 relatively flat, developed, and is not located near a hillslope or in an area subject to downstream flooding or landslides. The project site is not in a high or very high FHSZ. The project would not include any design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be *less than significant*.

Conclusion

The project would not expose people or structures to new or exacerbated wildfire risks and would not require the development of new or expanded infrastructure or maintenance to reduce wildfire risks. Therefore, potential impacts associated with wildfire would be less than significant and mitigation measures are not necessary.

Mitigation

None required.

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?	☐	☒	☐	☐

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☒	☐	☐

Setting

Refer to setting information provided above.

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?

Based on the scale of proposed development and implementation of mitigation measures, the project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of 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. Potential impacts would be *less than significant with mitigation*.

(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. The project would be similar to existing development within the Morro Shores MHP and would be consistent with design standards

of the RSF land use category. Therefore, the contribution of the proposed project to potential cumulative impacts to aesthetics is considered less than cumulatively considerable.

Agricultural Resources
The analysis included in Section II, Agriculture and Forestry Resources, concludes that the project does not have the potential to convert agricultural land to non-agricultural us or convert forest land to non-forest use. Therefore, impacts would be less than cumulatively considerable.

Air Quality
The analysis included in Section III, Air Quality, concludes that the project's potential construction-related and operational emissions would be below SLOAPCD thresholds of significance for both project-related and cumulative impacts. Based on the proximity to sensitive receptors, Mitigation Measures AQ-1 and AQ-2 have been provided to limit unnecessary idling and reduce fugitive dust emissions. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the proposed project to potential cumulative impacts to air quality is 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. With implementation of Mitigation Measures BIO-1 and BIO-2, 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 and Tribal Resources
The analysis provided in Section V, Cultural Resources, concludes that the project site is located within an Archaeologically Sensitive Area. Mitigation Measure CR-1 has been included to require preparation and implementation of an Archaeological Monitoring Plan. All reasonably foreseeable 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 project 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 proposed project to potential cumulative impacts related to energy use is considered less than cumulatively considerable.

Geology and Soils
Based on the analysis in Section VII, Geology and Soils, project-specific impacts related to ground-failure and associated hazards would be less than significant. In addition, required compliance with the County's CZLUO and the Central Coast RWQCB general permit requirements would reduce short- and long-term erosion at the site. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the proposed project to potential cumulative geology and soils impacts would be less than cumulatively considerable.

Greenhouse Gas Emissions
The analysis provided in Section VIII, Greenhouse Gas Emissions, concludes that the project's potential construction-related and operational emissions would be below SLOAPCD thresholds of significance for both project-related and cumulative impacts. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the proposed project to potential cumulative impacts related to GHG emissions is considered less than cumulatively considerable.

Hazards and Hazardous Materials
Based on the analysis in Section IX, Hazards and Hazardous Materials, project-specific impacts related to hazardous materials and associated hazards would be less than significant. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the proposed project to potential cumulative hazards and hazardous materials impacts would be less than cumulatively considerable.

Hydrology/Water Demand
As discussed in Section X, Hydrology and Water Quality, there is sufficient water supply in the existing well to support the project. Based on the limited amount of proposed construction activity and required compliance with existing regulations, runoff from the site would not result in degradation of water quality. All surrounding proposed development projects would undergo evaluation for potential to impact hydrological resources. Based on required compliance with the CZLUO and the Central Coast RWQCB permit requirements 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.

Land Use and Planning
Based on the analysis in Section XI, Land Use and Planning, the project would be consistent with the guidelines and policies for development within the Coastal Zone Framework for Planning, CZLUO, and COSE with implementation of mitigation measures identified in the resource sections throughout this IS/MND. The project includes infill development and would not physically divide an established community. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the proposed project to potential cumulative land use and planning impacts would be less than cumulatively considerable.

Mineral Resources
Based on the analysis in Section XII, Mineral Resources, there would be no project-specific impacts related to mineral resources. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the proposed project would have no impacts related to cumulative mineral resources impacts.

Noise
As discussed in Section XIII, Noise, noise associated with project construction would be mitigated through implementation of Mitigation Measure N-1. 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 proposed project to potential cumulative 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 0.5% 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 residents per year. Employment is expected to increase by about 6,441 employees, or about 184 employees per year.

The proposed project would result in approximately 25 new residents and would not induce substantial population growth. The project would be limited to 10 new mobile home units. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the proposed project to cumulative impacts related to population and housing is considered less than cumulatively considerable.

Public Services
Based on the discussion in Section XV, Public Services, the project and any 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 proposed project to potential cumulative 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 facilities. 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 proposed project to potential cumulative 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 county 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 proposed project to potential cumulative transportation impacts would be less than cumulatively considerable.

Utilities

Based on the analysis in Section XIX, Utilities and Service Systems, the project would require utility expansions to serve the additional mobile home units. Mitigation measures identified in the resource sections throughout this IS/MND have been included to avoid and/or minimize potential environmental impacts related to installation of expanded utility infrastructure. In addition, the project would be provided adequate solid waste, water, and sewer services. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the proposed project to potential cumulative utilities and service systems impacts would be less than cumulatively considerable.

Wildfire

Based on the analysis in Section XX, Wildfire, project-specific impacts related to wildfire and associated hazards would be less than significant. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the proposed project to potential cumulative wildfire impacts would be less than cumulatively considerable.

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

Environmental impacts that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. In addition, implementation of Mitigation Measures AQ-1 and AQ-2, BIO-1 and BIO-2, CR-1, and N-1 identified in the resource sections 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	**Not Applicable**
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☐	Air Pollution Control District	**Not Applicable**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☒	CA Coastal Commission	**None**
☐	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 Building Division	**In File****
☒	Other USFWS	**In File****

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

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

☒ Project File for the Subject Application

County Documents

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

☒ Land Use Ordinance (Inland/Coastal)
☐ Building and Construction Ordinance
☒ Public Facilities Fee Ordinance
☐ Real Property Division Ordinance
☐ Affordable Housing Fund
☐ Airport Land Use Plan
☒ Energy Wise Plan
☒ Estero Area Plan
☐ 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 Los Osos Community Plan

Initial Study – Environmental Checklist

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

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