City of San Luis Obispo

INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
For ER # 30-13

1. **Project Title:** Bob Jones Pathway Octagon Barn Connection

2. **Lead Agency Name and Address:** City of San Luis Obispo
919 Palm Street, San Luis Obispo, CA 93401

3. **Contact Person and Phone Number: Bryan Wheeler,** Public Works – Transportation, Planning, and Engineering (805) 781-7178

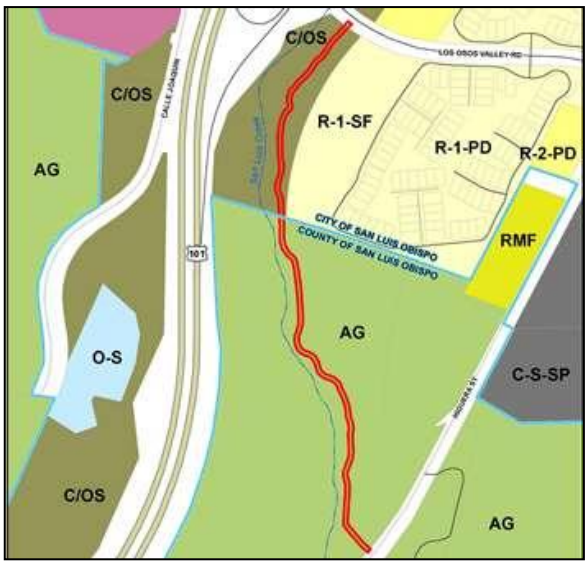
4. **Project Location:** 4433/4435 Octagon Way; generally follows the eastern edge of San Luis Obispo Creek, west of South Higuera Street, south of Los Osos Valley Road (refer to Attachment 1, Project Location Map)

5. **Project Sponsor's Name and Address:** City of San Luis Obispo, Public Works
919 Palm Street, San Luis Obispo, CA 93401

6. **General Plan Designations:** Open Space, Special Focus Area 11 Los Osos Valley Road Creekside Area (City); Agriculture, Airport Review Area, Flood Hazard Area, Highway Corridor Design Standards, Stormwater Management Area (County) (refer to Figure 1, Vicinity Map)

7. **Zoning:** Conservation/Open Space (C/OS-10) (City); Agriculture (County) (refer to Figure 1, Vicinity Map)

Figure 1. Vicinity Map



8. **Description of the Project:** The project consists of the construction and operation of an approximately 2,800-foot segment of the Bob Jones Pathway, which would connect an existing alignment of the Pathway within the City to the longer alignment proposed by the County of San Luis Obispo, which will extend from the Octagon Barn to the existing staging area on Ontario Road near Avila Beach. The project will include a twelve-foot wide asphalt surfaced pathway with two-foot wide shoulders on each side of the surfaced pathway. Grading and landscaping will occur within a 16 to 20 foot wide pathway easement. Construction of the pathway would primarily occur within a typically narrow 30- to 60-foot wide construction disturbance zone on

nearly level terrain. Additional components of the project include: grading a new perimeter agricultural road (approximately 12 feet wide and 2,500 feet long) parallel to the pathway (within the construction disturbance zone identified above); installation of safety signage on South Higuera Street, and installation of up to two pedestrian hybrid beacon (HAWK) or similar user-actuated flashing beacons to improve visibility of the South Higuera Street crossing. The total area of disturbance (conservatively assuming a 60-foot wide construction corridor) would be approximately 3.86 acres. Permanent disturbance would be approximately 1.3 acres for the pathway and 0.69 acre for the relocated perimeter agricultural road. Temporary fencing and similar materials (such as wattles, silt fencing, etc.) would be installed prior to construction. The intent of the fencing and similar materials is to provide a barrier between construction equipment and sensitive areas. A detailed project erosion control and revegetation plan, along with a Stormwater Pollution Prevention Plan (SWPPP), will therefore be a necessary and important part of the final project design. All stockpiling would be confined to the construction zone. The project also includes the installation of fencing, signage, and other fixtures.

The City is the Lead Agency and the County of San Luis Obispo is a Responsible Agency under the California Environmental Quality Act. The City Public Works Department, County Parks & Recreation Department, and County Planning Department are partnering to implement the proposed project, and this partnership is hereafter references as "City/County".

9. Project Entitlements:

The project requires approval by the City Planning Commission and County General Plan conformity concurrence.

10. Surrounding Land Uses and Settings:

The project site roughly parallels the eastern bank of San Luis Obispo Creek from the southern edge of Los Osos Valley Road to South Higuera Street (Assessor's Parcel Numbers [APNs] 053-161-020 and 076-081-026). Approximately 1,000 linear feet would be located within the City limits, and approximately 1,800 linear feet within the County (totaling approximately 2,800 linear feet).

The project site is within the Conservation/Open Space (City) and Agriculture (County) land use categories. The project site generally consists of a graded agricultural road along the perimeter of a field of row crops. The project site is located within City Land Element (LUE)-designated Special Focus Area 11 (Los Osos Valley Road Creekside Area); the LUE calls for up to 159 medium high density residential infill housing with open space in this area, which also encapsulates the existing residential areas along Los Osos Valley Road. This Special Focus Area is heavily constrained by the San Luis Obispo Creek flood zone along its western boundary and by its proximity to the Los Osos Valley Road Interchange and lack of frontage on South Higuera Street. Flooding and access issues are required to be addressed prior to future residential development in this area. The entire alignment is within Federal Emergency Management Agency (FEMA) Floods Zone A (areas subject to inundation by the 1-percent-annual-chance flood event, and no Base Flood Elevations or flood depths are shown) and AE (Base Flood Elevation ranges from 100-104 feet). Mandatory flood insurance purchase requirements and floodplain management standards apply in both zones. The City Land Use Element (LUE) states that agricultural designations shall be maintained along the west side of the site, and

compatibility with adjacent residential areas is required as a part of future development. The LUE calls for the permanent protection of San Luis Obispo Creek, and accommodation for changes to the Los Osos Valley Road right-of-way (as a part of the U.S. 101/Los Osos Valley Road Interchange project, currently under construction) (LUE Section 8.12). The project site is located solely within the Conservation/Open Space portion of this Special Focus Area. County-designated overlays include Airport Review Area and Flood Hazard, and the County parcel is within an Open Space Easement.

Land use zones proximate to the proposed alignment include: Conservation/Open Space and Tourist Commercial (City) to the north and northwest; Conservation/Open Space, Residential 1 and 2 (Special-Focus Area), and Commercial Service (Special-Focus Area) (City) and Residential Multi-Family and Agriculture (County) to the east and northeast; Conservation/Open Space and Open Space (City) and Agriculture (County) to the west; and Agriculture (County) to the south. Land uses to the immediate east and west of the alignment are predominantly agricultural; San Luis Obispo Creek traverses two agricultural row crop fields located east of U.S. Highway 101 and west of South Higuera Street. Additional land uses proximate to the proposed alignment include: Los Osos Valley Road and the U.S. 101/Los Osos Valley Road Interchange to the north; agricultural fields and scattered residences to the south; residential multi-family and single-family neighborhoods, South Higuera Street, and the Octagon Barn to the east; and, San Luis Obispo Creek, agricultural fields, and U.S. 101 to the west.

11. **Other public agencies whose approval is required:**
County of San Luis Obispo, Regional Water Quality Control Board, Air Pollution Control District, County Airport Land Use Commission, California Department of Fish and Wildlife, U.S. Army Corps of Engineers

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

FISH AND WILDLIFE FEES

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

STATE CLEARINGHOUSE

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made, by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	--X--
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant" impact(s) or "potentially significant unless mitigated" impact(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Signature

9/15/16
Date

Tyler Corey
Printed Name

For: Michael Codron,
Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).

5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c) (3) (D)). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they addressed site-specific conditions for the project.

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

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

8. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:					
a) Have a substantial adverse effect on a scenic vista?	1, 2, 3, 6		--X--		
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	2, 3		--X--		
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	2, 3		--X--		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				--X--	

Evaluation

The project alignment is located along the eastern bank of San Luis Obispo Creek, between Los Osos Valley Road and South Higuera Street (refer to Attachment 2, Proposed Project Site Plan) . The project site is agricultural, and the dense canopy of San Luis Obispo Creek is visible from South Higuera Street. Surrounding areas present a visual transition from urban development within the City, to scattered residences, agricultural uses, and vacant land in the County. The Octagon Barn is located east of the corridor, on the eastern side of South Higuera Street.

The project site is visible from both the northbound and southbound travel lanes of South Higuera Street and Los Osos Valley Road (between the interchange and existing residential development). Current views from the 445-foot section of Los Osos Valley Road include the U.S. 101/Los Osos Valley Road Interchange, San Luis Obispo Creek, agricultural fields, and proximate residential development to the south and commercial development to the north. Views from an approximately 1,600-foot segment of South Higuera Street include the Octagon Barn, agricultural fields, scattered residences, and utility poles and lines. As travelers head to the south, the visual character is agricultural; as travelers head northbound, the character transitions from agricultural to urban development, including residential neighborhoods, commercial storage facilities, and other commercial development within the City.

Photo 1. Project site (right side of photo) and views looking southwest on South Higuera Street

Photo 2. Northbound approach to project site looking northeast on South Higuera Street

Photo 3. Northwest view of project area as seen from South Higuera Street (path would follow riparian corridor)

This area is designated in the City's Conservation and Open Space Element (COSE) as having high scenic value (Figure 11:

Scenic Roadways and Vistas). The project site is not located within a specific "cone of view" as identified by the COSE. Policy 9.2.1 of the City COSE and Policy 15.1.2 of the City Circulation Element mandate that new development projects not wall off scenic roadways and block views. Pursuant to City COSE Policy 9.3.6 and 15.1.2 of the City Circulation Element, view blockage along scenic roadways is considered a significant impact and requires consideration during environmental review. In addition to vehicles, potential viewers include pedestrians and bicyclists.

County Conservation and Open Space Element (COSE) Goal VR3 and associated policies and implementation strategies aim to preserve the visual identities of communities by maintaining community separators between cities and communities. Policies include distinction between rural areas, preservation of rural character and open space, conservation tools, and community involvement. Goal VR4 and associated policies and implementation strategies identify and protect distinct visual resources within scenic corridors. Policy VR4.1 requires that the County designate scenic corridors based on the recommendations for Scenic Corridor Studies. South Higuera Street and Los Osos Valley Road are not identified as "Suggested Scenic Corridors" in the County COSE. Policy VR4.2 requires the balanced protection of scenic resources with the protection of biological resources and agricultural resources that may co-exist within the scenic corridor. Goal VR5 and associated policies and implementation strategies protect views from scenic vistas and vista points.

a), b) The proposed pathway would be constructed at average natural grade, and above-ground elements may include fencing and a crossing over an existing drainage adjacent to South Higuera Street. The project does not include the removal of any trees or high-growing vegetation, and the pathway would be located generally within an existing agricultural road. While the project would be visible upon completion, based on the nature of the project and lack of substantial above-ground elements, implementation of the project would have a less than significant impact on the vistas seen from public roadways. During construction, equipment and materials would be visible from affected public roadways. The topography of the alignment is nearly level, and grading would not require deep cut slopes. The removal of grasses and low-level vegetation, and vegetation trimming during construction may result in short-term adverse visual changes, which would be considered a potentially significant impact. Restoration of graded areas (that would not be paved) with agriculturally-compatible, non-invasive, native species would mitigate this impact.

Mitigation Measures: The City/County shall comply with the following measure:

AES-1 Prior to construction, grading and construction plans shall be prepared showing the following elements and verification measures:

a. Grading and landform alterations shall be minimized to the maximum extent feasible, and shall blend with the natural topography by following existing contours where feasible.
b. Fences shall consist of 48-inch T-post wire and 36-inch split rail.
c. The bridge crossing at the pathway approach to South Higuera Street shall be designed to be compatible with the existing agricultural visual setting, and shall include the use of wood (or wood-simulated) or painted (dark brown or dark green, non-reflective, muted color) guard rails. Weather-resistant, durable materials shall be used to minimize required maintenance.
b. Appropriate non-invasive native plant materials (i.e., ground cover for pathway shoulders, shrubs and trees for areas where these plants have been removed or trimmed), as identified by a qualified individual, and as agreed to by the agricultural landowner, that will cover graded areas and cut and fill slopes and that are compatible with adjacent vegetation to minimize visual impacts.
c. Revegetation of disturbed areas shall occur concurrent with construction.
d. The City/County shall be responsible for mitigation monitoring to ensure mitigation planting is installed and maintained for five years to ensure establishment.

Conclusion: Less than significant impact with mitigation.

c) Implementation of the project would introduce a new feature into the visual landscape; however, the path would follow existing topography, and based on implementation of mitigation measure AES-1, would not include any features that would be considered out of character with open space and agricultural areas. Bicyclists currently use the bike lane within South Higuera Street, and in the long-term, the project would provide improved scenic views for cyclists and pedestrians on the Bob Jones Pathway. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact with mitigation.

d) The proposed project includes a user-activated flashing beacon at the proposed crosswalk across South Higuera Street. The beacon is similar to a traffic signal, and would not emit a source of light or glare significantly different or greater than existing sources of lighting in the immediate area. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

As discussed above, the proposed project appears to be consistent with the City General Plan and Zoning Code and the County General Plan, and would not include any features that would result in a significant adverse effect to aesthetic resources following implementation of mitigation measures.

2. AGRICULTURE RESOURCES. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	1, 2, 3, 4, 5, 6, 7, 8		--X--		
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	1, 2, 3, 4, 5, 6, 7, 8		--X--		
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	1, 2, 3, 4, 5		--X--		

Evaluation

Onsite soils include Cropley clay (0-2 percent slopes) and Salinas silty clay loam (0-2 percent slopes); both soil types are considered Prime Farmland if irrigated (Natural Resources Conservation Service, WebSoils 2015). These soils are considered Prime Farmland and Highly Productive Rangeland Soils in the County of San Luis Obispo Conservation and Open Space Element; one of goals of the Element is to conserve important agricultural soils (refer to Soil Resources, Goal 3). The project site is also designated Prime Farmland by the California Department of Conservation (2013). The project site is zoned for agricultural and open space uses, and supports irrigated row crops, agricultural roads, utilities, and infrastructure. The project site is located within the Edna Valley Agricultural Preserve Area; however, the project site is not under a Williamson Act Contract. The parcel to the south, east of South Higuera Street, is under Contract held with the County.

The City's 2014 LUCE Final EIR identified a Class II (less than significant impact with mitigation) as a result of future development in the City pursuant to the adopted City LUE on prime farmland, unique farmland, and/or farmland of statewide importance (refer to Impact AG-2 in the Final EIR). Required mitigation includes permanent protection of an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area. This requirement is also set forth in City COSE Section 8.6.3(C).

Development on prime agricultural land may be allowed if the development contributes to the protection of agricultural land in the urban reserve or greenbelt by one or more of the following methods, or an equally effective method: acting as a receiver site for transfer of development credit from prime agricultural land of equal quantity; securing for the City or for a suitable land conservation organization open space or agricultural easements or fee ownership with deed restrictions; helping to directly fund the acquisition of fee ownership or open space easements by the City or a suitable land conservation organization (Policy 1.8.2 Prime Agricultural Land). The Agriculture Element of the County of San Luis Obispo General Plan provides a background on agricultural resources within the county. Through the goals, policies, implementation programs, and measures provided within the document, the County's intent is, "To promote and protect the agricultural industry of the County, to provide for a continuing sound and healthy agriculture in the County, and to encourage a productive and profitable agricultural industry." Four policies most relevant to the proposed project include:

AGP 17: Agricultural Buffers. This policy aims to minimize the effects of the incompatibilities discussed previously through the use of buffer zones between the areas in production and incompatible uses such as residences, and schools. Conflicts between uses can adversely affect the agricultural viability of the land and the health of nearby residents. Public bikeway or trails can be considered a potentially incompatible land use.

AGP 24: Conversion of Agricultural Land. This policy discourages the conversion of agricultural lands to non-agricultural uses. It focuses on two types of development that can adversely affect agriculture: 1) expansion of the existing urban boundaries into agricultural lands, and 2) "leapfrog" development that results in "pockets" of urban development surrounded by agricultural areas. Both of these scenarios put pressure on agricultural lands to convert to other uses.

AGP31: Recreational Use of Agricultural Lands. This policy encourages recreational uses on privately-owned lands on a case-by-case basis where such uses are compatible with on- and offsite agriculture and with scenic and environmentally sensitive resources.

AGP32: Trail Access to Public Lands. This policy states that access trails shall not conflict with agriculture or environmentally sensitive resources, and sufficient policing and maintenance shall be provided so that trails do not result in trespass or in damage to sensitive resources, crops, livestock, other personal property, or individuals.

The San Luis Obispo County "Right-to-Farm" Ordinance states that the use of real property for agricultural operations is a high priority and favored use. Ordinance No. 2561 (August 1992), added Chapter 5.16 to Title 5 of the San Luis Obispo County Code relating to Agricultural Lands, Operations, and The Right To Farm. Paragraph "b" of Section 5.16.020 (Findings and Policy) states:

> *"Where non-agricultural land uses occur near agricultural areas, agricultural operations frequently become the subjects of nuisance complaints due to lack of information about such operations. As a result, agricultural operators may be forced to cease or curtail their operations. Such actions discourage investments in farm improvements to the detriment of agricultural uses and the viability of the County's agricultural industry as a whole."*

The right-to-farm ordinance advises purchasers of residential and other property types adjacent to existing agricultural operations of the inherent potential problems associated with the purchase of such property. Concerns may include the noise, odors, dust, chemicals, smoke, and hours of operation that may accompany agricultural operations.

The California Leafy Greens Marketing Agreement (LGMA) is a model program that was created in 2007 to protect public health and establish a culture of food safety on leafy green farms. Participating leafy greens farmers and handlers operate with oversight by the state to verify through government audits that farmers are following a set of science-based food safety standards. The LGMA has an effect on land use planning when participating members are affected by trails and other development located near production agriculture. The LGMA collaborates between the government and farming communities, and incorporates science-based food safety practices and mandatory government inspections in an effort to assure safe leafy green products. These standards may include buffers from riparian areas and trails. In January 2013 new federal laws overseeing fruits and vegetable food safety were issued as part of the Food Safety Modernization Act (FSMA). The food safety practices being followed by leafy greens farmers in California are focused on the same risk areas identified in FSMA and meet or exceed the requirements proposed in the Produce Rule, which establishes on-farm food safety practices that farmers of fresh produce crops must follow to reduce the risk of contamination by foodborne pathogens.

a) Implementation of the project includes grading and disturbance to construct the pathway and associated drainage and vegetative buffer improvements, and the existing perimeter agricultural road would be relocated to the east of the pathway. Construction of the project within the proposed 30 to 60-foot pathway construction corridor would result in the temporary disturbance of up to 3.86 acres of Prime Farmland. Permanent conversion of Prime Farmland to a non-agricultural use within the proposed 20-foot wide easement would equate to 1.3 acres; the affected area consists of vacant land used for agricultural access along the western edge of the agricultural fields. Construction and operation of the project would require development up to, and potentially encroaching into the active row crops. In addition, grading for the perimeter agricultural road would displace approximately 0.69 acre of irrigated crops; use of this area would be under the discretion of the landowner. The City General Plan requires an offset to the permanent impact of the project on Prime Farmland at a minimum 1:1 ratio. In addition, topsoil

shall be preserved for the landowner's reapplication. Based on implementation of mitigation identified below, potential impacts would be less than significant.

Mitigation Measures: The City and County shall comply with the following measure:

AG-1 Prior to commencing construction, grading and construction plans shall be prepared showing compliance with the following measures:

a. During grading activities, contractor shall set aside the top six inches of topsoil for incorporation into the adjacent agricultural field by the agricultural landowner.
b. All groundcover, soil stabilizers, and erosion control measures shall avoid the use of invasive plant and seed material.

AG-2 Prior to commencing operation of the pathway, City and County of San Luis Obispo shall provide a payment of $6,000 per acre to offset the permanent impact of 1.3 acres of prime farmland at a minimum 1:1 ratio, pursuant to City LUCE Policy 1.8.2 and City COSE Policy 8.6.3(C). These funds will be held in a designated fund with the City of San Luis Obispo for future acquisition of land or land interests of equal area and of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area. The City/County shall identify an appropriate site prior to the construction phase of the project.

Conclusion: Less than significant impact upon implementation of mitigation.

b) &c) Based on the City's General Plan and Zoning Code, the proposed pathway is an allowable use on the property. The COSE states that passive recreation activities include: hiking, nature study, bicycle use (Section 8.5.5 Passive Recreation). The COSE notes that the creation of public access to open space resources should be provided when doing so is consistent with the security and privacy of affected landowners and occupants, and public access to or through production agricultural land will only be considered if the owner agrees (Section 8.5.1 Policies, Public Access). City COSE Section 8.3.2.(C) also calls for establishing buffers between agricultural activities and natural habitat areas that the proposed pathway would provide. Based on the County's General Plan and Land Use Ordinance, public pathways are not a prohibited use on Agricultural land.

County Agriculture Element Policy AGP-24, Conversion of Agricultural Land, discourages the conversion of agricultural lands to nonagricultural uses. This policy primarily pertains to changes in land use designations or zoning; however, it may provide guidance when physical changes to agricultural land are proposed. It focuses on two types of development that can adversely affect agriculture: (1) expansion of the existing urban boundaries into agricultural lands, and (2) "leapfrog" development that results in "pockets" of urban development surrounded by agricultural areas. Both of these scenarios put pressure on agricultural lands to convert to other uses. In addition, AGP-24 allows approval of conversion of agricultural land to non-agricultural designations based on the following findings:

a. the land does not meet the criteria for inclusion in the Agriculture designation in this plan or the Land Use Element; and
b. agricultural production is not feasible due to some physical constraint (such as soil infertility, lack of water resource, disease), or surrounding incompatible land uses; and
c. adjacent lands are already substantially developed with uses that are incompatible with agricultural uses; and
d. the conversion to non-agricultural uses shall not adversely affect existing or potential agricultural production on surrounding lands that will remain designated Agriculture; and
e. there is an over-riding public need for the conversion of the land that outweighs the need to protect the land for long-term agricultural use, such as the orderly expansion of an incorporated city or community.

Approval of agricultural land conversions also requires a finding that the conversion will not materially reduce groundwater recharge. As proposed, it appears the County would be able to make these findings as:

- The site is zoned Agriculture and the project would not be inconsistent with the designation or result in a change in land use category; and
- The area proposed for the path is adjacent to San Luis Obispo Creek, and is not currently farmed to provide a

buffer between the creek and the field; and

- Adjacent land uses are not necessarily incompatible with the agricultural fields, but the project would not result in an overall change in use on the project site (i.e., the farming would continue upon implementation of the project); and
- The conversion would be located along the edge of the field, and would not adversely affect existing or potential agricultural production onsite or on surrounding lands, due to the conservation of top soil and implementation of protection fencing and signage, compliance with dust control measures, use of non-invasive plant and soil stabilization measures upon the agreement of the landowner, provision of an eastern perimeter agricultural road to be used and modified at the discretion of the landowner; and
- The project provides substantial public benefit by providing an important link to the Bob Jones Pathway, and the remainder of the land would continue to be farmed in approximately the same acreage as currently exists.

Implementation of the proposed project may result in incompatibilities or conflicts with the adjacent agricultural operation as a result of increased human presence near the fields. Potential issues include potential exposure to pesticides, introduction of new contaminants to the agricultural operations, and/or increase trespassing on private property. The proposed pathway would displace the existing agricultural road along the western perimeter of the fields. As a result, the existing agricultural roadways may need to be realigned to allow for construction and use of the proposed pathway. In addition to directly affecting access to agricultural land, the proposed project is expected to attract local residents, cycling enthusiasts, and tourists looking for a recreational experience to an area that has traditionally been occupied by agricultural operators, which may result in incompatibilities or conflicts. Users could potentially be exposed to pesticides, dust, odors, and noise associated with the agricultural operations or could introduce new contaminants to the agricultural operations. However, many of the existing agricultural operations that would be affected by the proposed project are already having to adjust their operations due to proximity to existing public roadways and waterways. Potential trespassers can injure themselves, remove/break fences and gates, or otherwise disrupt agricultural operations. Therefore, construction of the proposed project could result in potential conflicts with existing agricultural operations. This would be considered a potentially significant impact.

Fences (48-inch T-post wire and 36-inch split rail) are proposed along this section of the trail corridor, which would help to reduce potential trespass and conflicts. However, conflicts may result in unintended consequences such as stricter regulations for operations, reduced yields, or, in some cases, lawsuits, the costs of which could make agriculture less viable. In addition, the creation of additional runoff, potentially including waste from pets, may have an adverse effect on crop production. These would be considered potentially significant impacts. These incompatibilities are not anticipated to result in additional conversion of agriculture (on or off-site), provided identified mitigation is implemented. Preparation and implementation of a Farmland Conflict Reduction Plan, and control of runoff from the pathway would mitigate these potentially significant compatibility impacts to less than significant.

Mitigation Measures: The City and County shall comply with the following measures, in addition to compliance with stormwater, drainage, and erosion and sedimentation control regulations pursuant to the City and County Code:

AG-3 Prior to commencing construction, the City and County of San Luis Obispo, in coordination with property owners and the San Luis Obispo County Department of Agriculture, shall develop and implement a Farmland Conflict Reduction Plan. The Farmland Conflict Reduction Plan shall include, at a minimum: methods for minimizing trespassing and disturbance by trail users; procedures for minimizing pesticide exposure (notification, pathway closure, etc.); and establishment of potential temporary pathway closure procedures. The Farmland Conflict Reduction shall also include and comply with the following measures:

a. Examples of the signage, striping, and fencing required. Signage shall describe the importance of the local agricultural lands and educate the public/users how to respect the surrounding important resources and reduce conflicts, including, but not limited to, the following: staying on designated trails; minimizing litter/waste; and prohibiting picking of crops.
b. Signage shall be located at the northern and southern terminuses of the alignment, and all signage shall be installed prior to public use of the trail.
c. Pathway alignment and intersections shall be designed to minimize conflicts with agricultural operations through use of deterring devices such as fencing, striping, signage, bollards, and paving. Pavement and intersection development standards shall be identified and accommodate use by agricultural machinery and vehicles at all

pathway/agricultural road intersection locations in order to minimize maintenance requirements where the pathway crosses agricultural roads. All methods of reducing conflict shall be demonstrated on final construction documents.

d. Circumstances that require temporary pathway closure shall be clearly defined. Such circumstances may include routine maintenance, agricultural spraying, or potential and/or actual flood conditions. The timing of and average duration of routine temporary closures shall be clearly defined.
e. Every effort shall be made to schedule temporary pathway closures during non-peak pathway usage periods, which are typically weekends, holidays, and commute hours, as established with agricultural operator. Any temporary closures shall be clearly posted at the trailheads, parking areas, and point of closure. The notification shall identify the reason for the closure, time and date of closure, and duration of closure.
f. Signage shall be posted at least 24 hours prior to closure and removed immediately upon the identified duration or being cleared for re-opening by the City and County of San Luis Obispo.
g. Prior to issuance of grading permit and initiation of grading activities, the City and County of San Luis Obispo shall ensure that final construction documents include the requirements of the Farmland Conflict Reduction Plan

AG-4 Prior to commencing construction, the City and County of San Luis Obispo shall ensure proposed grading, drainage, and construction plans, stormwater management plan, Storm Water Pollution Prevention Plan, and sedimentation and erosion control plan include best management practices that would ensure that the proposed project minimizes the quantity and rate of runoff off-site. The pathway shall be graded to convey runoff away from agricultural crops and fields to reduce runoff onto adjacent agricultural lands.

AG-5 Prior to operation of the pathway, and throughout the life of the project, the City and County of San Luis Obispo shall provide and dispose of refuse bags and disposal cans for domestic animal waste at an accessible, serviceable point along the alignment.

Conclusion: Less than significant impact upon implementation of mitigation.

As discussed above, the proposed alignment would be located within an existing agricultural area, and would result in a pathway located adjacent to agricultural crops. City/County will implement mitigation identified above to substantially reduce the potential for land use conflicts and further conversion of agricultural land to non-agricultural uses and/or loss of productivity. These measures would be implemented in coordination with the agricultural landowner to ensure the design and management of the pathway is compatible with the agricultural operation.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?	10, 11			--X-	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	2, 11			--X--	
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	2, 10, 11			--X--	
d) Expose sensitive receptors to substantial pollutant concentrations?	11		--X--		
e) Create objectionable odors affecting a substantial number of people?	11			--X--	

Evaluation

The project site is located within the jurisdiction of the San Luis Obispo Air Pollution Control District (SLOAPCD). SLOAPCD is located within the South Central Coast Air Basin. Implementation of the project may result in the generation of

construction emissions, exposure to naturally occurring asbestos (if present), potential exposure to material containing asbestos (if present), and generation of fugitive dust. The project does not include demolition activities and vegetation burning would be prohibited. Compliance with existing regulations and consistency with the SLOAPCD CEQA Handbook (2012) would address potential air quality impacts, as noted below.

a) SLOAPCD adopted the 2001 Clean Air Plan (CAP) in 2002. The 2001 CAP is a comprehensive planning document intended to provide guidance to the SLOAPCD and other local agencies, including the City, on how to attain and maintain the state standards for ozone and PM10. The CAP presents a detailed description of the sources and pollutants which impact the jurisdiction, 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. The proposed project is consistent with the general level of development anticipated and projected in the CAP. The project is consistent with the CAP's land use and transportation planning strategies, including provision of a pedestrian and bicyclist pathway proximate to existing urban uses, and connecting to a larger pathway network along the Bob Jones Pathway corridor. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

b), c) SLOAPCD monitors air pollutant levels to assure that air quality standards are met, and if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the air basin is classified as being in "attainment" or as "non-attainment". SLOAPCD is currently in non-attainment for 1-hour and 8-hour ozone and 24-hour and annual arithmetic mean respirable particulate matter (PM_{10}).

Pursuant to the City's 2014 LUCE Final EIR, required mitigation measures include standards to reduce fugitive dust and combustion emissions, consistent with the most current SLOAPCD-recommended construction-related mitigation measures. Compliance with these standards is monitored during the building permit plan check process and by field inspections conducted by Building Division inspectors. All secondary effects caused by construction are expected to be short term.

Implementation of the proposed project would require grading and construction, which would generate air emissions. Use of portable equipment over 50 horsepower (hp) would require a permit from SLOAPCD.

The project would result in the disturbance of approximately 3.86 acres. Construction activities would generate fugitive dust particles, ozone precursors, and diesel exhaust that could result in an increase in criteria pollutants and could also contribute to the existing non-attainment status for ozone and PM_{10}. Potential construction emissions were estimated using CalEEMod. Based on limited information about grading and construction, defaults were applied. Table 1 below shows the estimated construction-related emissions. It is anticipated that the project would be constructed in less than one quarter. Based on the air quality modeling, the construction of the project would not generate emissions exceeding daily thresholds.

Table 1. Construction Emissions

	ROG and NOx (lbs/day)	PM10 (lbs/day)	DPM (lbs/day)[1]
Project Emissions	56.8	18.2	5.3
Daily Threshold	137	n/a	7.0
Mitigation Required	No	n/a	No
Mitigation Required	---	---	---

1. The DPM estimations were derived from the "PM10 Exhaust" output from CalEEMod as recommended by SLOAPCD. This estimation represents a worst case scenario because it includes other PM10 exhaust other than DPM.

The proposed project consists of a pathway connection, and does not include a staging area. Users would either access the pathway from the existing road network (or additional pathway connections to be constructed in the future), the Buckley Road Extension (project associated with development of Avila Ranch) or the Bob Jones Pathway-Octagon Barn Staging Area

proximate to the project site. The project would provide a key linkage to the overall pathway, which is anticipated to result in additional bicycle and pedestrian trips, only. The path is not available for motorized vehicles. Maintenance activities would be conducted by City and County staff, as needed. Based on the nature and location of the project, operational emissions are anticipated to be less than significant.

d) While the project would not exceed identified thresholds of significance, there is a potential for grading activities to generate fugitive dust and diesel particulates during ground disturbance and use of construction equipment, which would have a potentially adverse effect on the adjacent agricultural field, and proximate residential neighborhood. In addition, according to the SLOAPCD Naturally Occurring Asbestos Zones map, the project site is located in an area that is known to contain naturally occurring asbestos. Naturally occurring asbestos has been identified by the State Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are common in the City of San Luis Obispo and may contain naturally occurring asbestos. The proposed project would result in grading and therefore may encounter naturally occurring asbestos. Under the State Air Resources Board Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any construction or grading activities at the site, the City must comply with all applicable requirements outlined in the Asbestos ATCM, which include preparation of an Asbestos Dust Mitigation Plan and/or an Asbestos Health and Safety Program. Implementation of standard dust and diesel particulate control measures, in addition to compliance with standard grading, construction, and naturally occurring asbestos mitigation measures would mitigate potential impacts to sensitive receptors to less than significant.

Mitigation Measures: Construction-related air quality impacts could be reduced to a less than significant level through implementation of the following standard mitigation measures:

AQ-1 Fugitive Dust Control Measures. The proposed project shall implement the following dust control measures so as to reduce PM10 emissions in accordance with SLOAPCD requirements.

a. Reduce the amount of the disturbed area where possible;
b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (nonpotable) water should be used whenever possible;
c. All dirt stock pile areas should be sprayed daily as needed;
d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;
e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible after grading unless seeding or soil binders are used;
h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;
j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible;
l. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.

AQ-2 Construction Equipment. The proposed project shall implement the following Standard Control Measures for construction equipment as to reduce air emissions in accordance with SLOAPCD requirements.

a. Maintain all construction equipment in proper tune according to manufacturer's specifications;
b. Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for sue off-road);
c. Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
d. Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
e. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures may be eligible by proving alternative compliance;
f. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
g. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
h. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
i. Electrify equipment when feasible;
j. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
k. Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.
l. All of these mitigation measures shall be shown on grading and building plans, and confirmed by the contractor or builder in consultation with the City and County The contractor or builder shall be responsible for ensuring and demonstrating compliance during construction.

AQ-3 Developmental Burning. APCD regulations prohibit developmental burning of vegetative material within San Luis Obispo County; therefore, burning of vegetative material shall not occur.

AQ-4 Permits. Prior to construction, the contractor or builder shall obtain all required permits from SLOAPCD, and shall provide documentation to the City/County. Portable equipment and engines 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the ARB) or an Air District permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive:

a. Power screens, conveyors, diesel engines, and/or crushers;
b. Portable generators and equipment with engines that are 50 hp or greater;
c. Internal combustion engines;
d. Unconfined abrasive blasting operations;
e. Concrete batch plants;
f. Rock and pavement crushing;
g. Tub grinders; and,
h. Trommel screens.

AQ-5 Naturally Occurring Asbestos. Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities a geologic evaluation shall be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District. If NOA is found at the site, the contractor or builder must comply with all requirements outlined in the Asbestos ATCM. This may include development and implementation of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval and verification by the APCD. More information on NOA can be found at http://www.slocleanair.org/business/asbestos.asp.

Conclusion: Less than significant impact with mitigation.

e) The proposed project does not include any uses that would generate objectionable odors. Based on the location of the alignment, future users would not be exposed to objectionable odors. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

As proposed, the project would not result in significant air quality impacts due to exceedance of an identified threshold. Disturbed areas will either be paved or revegetated to minimize the potential for fugitive dust during operation. The perimeter agricultural road would be managed at the discretion of the landowner for agricultural purposes, similar to existing conditions. Mitigation is identified to address potential effects to sensitive receptors and the agricultural operation during construction. Therefore, potential impacts would be mitigated to less than significant.

4. BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 2, 3, 4, 30		--X--		
b) Have a substantial adverse effect, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 2, 3, 4, 30		--X--		
c) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	1, 2, 3, 4, 30		--X--		
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?	1, 2, 3, 4, 30		--X--		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	1, 2, 3, 4, 5, 6, 12			--X--	
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?	1, 2, 3, 4				--X--

Evaluation

The project site primarily supports agricultural production (row crops), and associated storage areas and unpaved agricultural roads. San Luis Obispo Creek is located along the western perimeter of the project site. Habitats present in the project area include: Central Coast Arroyo Willow Riparian Forest along the San Luis Obispo Creek corridor and its tributaries, and adjacent to a section east and west of South Higuera Street; Coastal and Valley Freshwater Marsh adjacent to a section west of South Higuera Street; a potential wetland feature located between San Luis Obispo Creek and the southwest corner of the neighborhood located south of Los Osos Valley Road (approximately on the City/County limit line); and ruderal/non-native grassland south of Los Osos Valley Road and east of South Higuera Street. The remainder of the project area supports production agriculture. Refer to Attachment 3, Habitat & Flood Zone Map.

The project area is within the south-central California coast region for steelhead trout (*Oncorhynchus mykiss mykiss*) and also within the range of the California red-legged frog (*Rana draytonii*). Both of these species are listed as federally threatened (FT) by the Endangered Species Act and are also known to inhabit San Luis Obispo Creek and its environs. San Luis Obispo Creek is considered critical habitat for steelhead trout (Estero Bay Hydrologic Unit 3310 – (xii) San Luis Obispo Creek Hydrologic Sub-area 331024). No other federally listed wildlife species are expected to occur within the project area. San Luis Obispo Creek is known to support western pond turtle (*Emys marmorata*) and Coast Range newt (*Taricha torosa*), both California species of special concern (SSC). The project area also has the potential to support nesting migratory birds/raptors during the

typical nesting season (March-September). Special-status plant species with potential to occur in the project area include marsh sandwort (*Arenaria paludicola*), Obispo Indian paintbrush (*Castilleja densiflora* ssp. *obispoensis*), La Graciosa thistle (*Cirsium loncholepis*), and adobe sanicle (*Sanicula maritima*).

Steelhead-south/central California coast ESU is listed as federally threatened and is considered a California Special Concern species. Steelhead are the anadromous form of rainbow trout. Critical habitat has been established for this species. The main channel of San Luis Obispo Creek occurs within the south-central California coast steelhead critical habitat unit. Optimal habitat for steelhead is clear, cool water with abundant in-stream cover (i.e., submerged branches, rocks, logs), well-vegetated stream margins, relatively stable water flow, and a 1:1 pool-to-riffle ratio. Steelhead within the Central Coast region migrate up coastal drainages in the fall and spawn during the spring; post-spawning adults out-migrate to the ocean from March to July.

California red-legged frog is listed as federally threatened and is considered a California Special Concern species. This species is recognized by the reddish color that forms on the underside of its legs and belly. California red-legged frog prefers aquatic habitats with little or no flow, the presence of surface water to at least early June, surface water depths to at least 2.3 feet, and the presence of fairly sturdy underwater supports, such as cattails. This species typically breeds from January to July, with peak breeding occurring in February. Eggs are attached to subsurface vegetation, and hatched tadpoles require 11 to 20 weeks to metamorphose. Suitable habitat occurs year-round within San Luis Obispo Creek and its tributaries and in uplands adjacent to San Luis Obispo Creek; therefore, presence of this species within the project area is inferred.

Coast Range newt is considered a California Special Concern species. It is a moderate-sized, dark brown salamander with a bright yellow-orange to orange belly, and thick textured skin that exhibits papillation during its terrestrial phase, reverting to a relatively smooth condition during its aquatic phase. Coast Range newts occupy terrestrial habitats, but breed in ponds, reservoirs, and slow-moving streams. In spring, males arrive at breeding sites first, followed by females a few days to weeks later. In Central California, breeding appears to occur in two waves, the first in January or February and the second in March or April, although Coast Range newts may enter ponds as early as December. Egg masses are attached to rocks, stems, or root masses, and larvae take approximately three to six months to reach metamorphosis and feed mainly on aquatic invertebrates. Marginal habitat exists within San Luis Obispo Creek.

Southwestern pond turtle is considered a California Special Concern species. This species is mostly aquatic, leaving its aquatic site to reproduce, estivate (over-summer), and over-winter. Southwestern pond turtle prefers quiet waters of ponds, lakes, streams, and marshes. This subspecies inhabits reaches of streams that contain deep pools, from 3.0 to 5.2 feet in depth. They typically inhabit the largest and deepest pools along streams containing large amounts of basking sites, including fallen trees and boulders. Upland nesting sites are required near the aquatic site, and nests are typically located in open, clay, or silt slopes to ensure proper incubation temperature. Nesting sites may be more than 1,312 feet from the aquatic site, but most nests are within 656 feet. This species may over-winter on land or in water, but may remain active in water during the winter season. Suitable habitat occurs year-round within San Luis Obispo Creek and may occur in its tributaries after storm events. Southwestern pond turtle are known to inhabit San Luis Obispo Creek.

Two-striped garter snake is considered a California Special Concern. It is a medium-sized garter snake with a variable dorsal coloration of olive, brown, or brownish gray, with a single yellow-orange lateral stripe on each side of the body. An extremely aquatic species, the two-striped garter snake uses water for both predation and escape from predators. Its habitat includes perennial and intermittent streams with rocky substrate bordered by dense vegetation. The species is generally found near streams or stock ponds in the summer and occupies upland coastal sage scrub and grassy locations near its summer range in the winter. During the day, this garter snake often basks on streamside rocks or on densely vegetated stream banks. When disturbed, it usually retreats rapidly to water. In milder areas, mammal burrows and surface objects such as rocks and rotting logs serve as winter refuges. This species feeds on fish and other aquatic organisms. Suitable habitat occurs within the project area.

Cooper's hawk, a California Special Concern species, is a resident of San Luis Obispo County, nesting and foraging in and near deciduous riparian areas. Adults are slender, crow-sized birds with short, rounded wings and a long, white-tipped tail rounded at the tip. The Cooper's hawk occupies forests and woodlands, especially near edges. Nests are built in deciduous trees usually 20 to 50 feet above the ground, and breeding occurs March to August, peaking from May to July. Prey includes mostly birds and small mammals. Suitable nesting habitat occurs within the project area.

Sharp-shinned hawk is considered a California Special Concern species. It is a small accipiter hawk with a grayish back and a squared-off, banded tail, in comparison to the more rounded tail of the larger Cooper's hawk. This species roosts in intermediate to high-canopy forest or riparian areas at a height of 6 to 80 feet above the ground and within 275 feet of water. The breeding season is from April through August, peaking in late May to July. Sharp-shinned hawks primarily prey on small birds, but will also prey on small mammals, insects, reptiles, and amphibians. Suitable nesting habitat occurs within the project area.

White-tailed kite is considered a Fully Protected species under the California Fish and Game Code. It is a yearlong resident ranging throughout valley and coastal lowlands in California and most commonly near agricultural areas. It is an uncommon resident in San Luis Obispo County. Nesting and roosting occurs in dense, broad-leafed deciduous groves of trees. Breeding occurs from February through October, peaking in May through August. White-tailed kites prey chiefly on small mammals and occasionally on birds, insects, amphibians, and reptiles. Suitable nesting habitat occurs within the project area.

Loggerhead shrike is considered a California Special Concern species that prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. Nests are built on a stable branch in a densely foliaged shrub or tree, usually well concealed and 1.3 to 50 feet above the ground. Females lay eggs (four to eight) from March to May. The loggerhead shrike is the only known predatory songbird and often impales its prey on barbed wire or trees because it lacks talons or claws. Their diet consists primarily of insects, amphibians, and small mammals and birds. Suitable nesting habitat occurs within the project area.

Purple martin is a California Special Concern species; it is a dark purple-black swallow. At one time, the species was a fairly common breeder in the Coast Range, but in the last 15 years there has been a dramatic decrease in Southern California. The purple martin inhabits hardwood, hardwood-conifer, riparian, and coniferous habitats. It usually nests in old woodpecker cavities but will occasionally nest in man-made structures. The species nests from April to August, with peak activity in June. They feed primarily on insects. Suitable nesting habitat occurs within the project area.

Yellow warbler is considered a California Special Concern species. Yellow warblers are migratory and a fairly common summer transient of deciduous riparian habitats within the county. Breeding and nesting of yellow warblers typically occurs from mid-April to early August, with peak activity occurring in June. Suitable nesting habitat occurs within the project area.

Yellow-breasted chat is considered a California Special Concern species. Preferred habitat for cover, foraging, and nesting consists of willow riparian thickets, with dense understory cover. In San Luis Obispo County, observations of yellow-breasted chat are limited to uncommon occurrences from May to mid-August, concurrent with their breeding period, which peaks in June. Suitable nesting habitat occurs within the project area.

Nesting Birds and Roosting Bats. In addition to the bird species discussed above, numerous other nesting bird species protected by the Migratory Bird Treaty Act and California Fish and Game Code Section 3503 have the potential to nest in habitats within the project area. Furthermore, other bat species protected by the CDFW or under CEQA have the potential to roost in habitats within the project area. Based on review by the City Natural Resources Manager, bat roosting habitat is not present within the project site.

Congden's tarplant is an annual herb in the daisy family (Asteraceae) that is native to California. It is a California Native Plant Society Rare Plant Rank 1B.1 species. Congden's tarplant occurs in valley and foothill grassland. The species blooms from May to November. Marginal habitat occurs along the project alignment.

Jones' layia is an annual herb in the daisy family (Asteraceae) that is native to California. It is a CNPS Rare Plant Rank 1B.2 species. Jones' layia occurs in clay or serpentinite chaparral and valley and foothill grassland. The blooming period for this species is March through May. Marginal habitat for this species is located along the project alignment.

Marsh sandwort is a stoloniferous herb in the pink family (Caryophyllaceae) that is native to California and Washington. It is a federal and state Endangered and CNPS List 1.B.1 species. Marsh sandwort occurs in bogs and ferns along with freshwater marshes and swamps. The species flowers from May to August. It is federally listed as endangered and is known to occur in coastal lake and spring habitats in San Luis Obispo County (CNDDB, 2006-2008). Marginal marsh habitat occurs along the streambed of San Luis Obispo Creek.

Obispo Indian paintbrush is an annual herb in the figwort family (Scrophulariaceae) that is endemic to California and found only in San Luis Obispo County. It occurs in meadows and seeps, and valley and foothill annual grassland communities, flowering from April to May. The CNPS considers this species to be rare and fairly endangered in California (List 1B.2).

La Graciosa thistle is a perennial herb in the sunflower family (Asteraceae) that is native to California. It occurs in cismontane woodland, coastal dunes, coastal scrub, marshes and swamps, and valley and foothill grasslands on sandy, mesic soil. The species flowers from May to August. It is federally listed as threatened, state listed as endangered, and the CNPS considers this species as rare and seriously endangered in California (List 1B.1). Habitat is considered marginal for this species within the project area, and most known occurrences occur south of Pismo Beach, well south of the project.

Adobe sanicle is a perennial herb in the carrot family (Apiaceae) that is endemic to San Luis Obispo County. It occurs in chaparral, coastal prairie, meadows and seeps, and valley and foothill grassland habitats on clay and serpentine soil. The species flowers from February to May. The CNPS considers this species as very rare and seriously endangered in California (List 1B.1).

Based on the results of seasonal botanical surveys, which were conducted by an SWCA biologist on April 8 and August 10, 2016 within the blooming period for plants with the potential to occur within the project area, no special-status plant species are present onsite.

a), d) The proposed alignment would be located within upland habitat along the San Luis Creek corridor. The project would not block or impede the existing wildlife corridor within San Luis Obispo Creek. Potentially significant impacts to special-status species in the project area are addressed below.

Steelhead-south/central California coast ESU. The proposed alignment would be located within upland habitat, along the San Luis Creek corridor. Implementation of the project would not have a direct effect on steelhead, as the project would avoid direct effects to San Luis Creek. During construction and operation of the pathway, discharge of sediment or pollutants into the creek would have an adverse impact on aquatic habitat for this species. Based on compliance with existing regulations, including preparation and implementation of an erosion and sedimentation control plan and SWPPP, and implementation of temporary exclusion fencing and/or flagging along the construction corridor, and implementation of creek protection measures, potential impacts would be mitigated to less than significant.

California red-legged frog. The proposed project would result in the use of construction equipment, generation of construction debris, and worker foot-traffic, which may directly result in the injury or mortality of California red-legged frog adults and sub-adults in upland areas along the creek corridor. Noise and vibration generated by construction activities associated with the proposed project may indirectly result in temporary abandonment of habitat adjacent to work areas, which may increase the potential for predation and desiccation if these species abandon shelter sites, and erosion and sedimentation may indirectly affect breeding sites. The proposed project does not include removal of trees or riparian vegetation, and would therefore not result in any changes to shading and microhabitat temperature regulation in the creek channel.

The proposed project would have the potential for a take of California red-legged frog during construction in upland dispersal habitat adjacent to San Luis Obispo Creek and any necessary capture and relocation of this species. The potential for take is believed to be very low, as California red-legged frogs are believed to be uncommon along the creek corridor. Pursuant to Section 7 of the Endangered Species Act, formal consultation may be necessary with the U.S. Fish and Wildlife Service (USFWS) for impacts to California red-legged frog. Potential impacts to California red-legged frog and its upland habitat would be considered a potentially significant impact. Implementation of avoidance and management mitigation measures would require preparation and implementation of a Habitat Mitigation Monitoring Plan (HMMP), an environmental training program, pre-construction surveys, and several measures to avoid water quality impacts, which would also minimize habitat impacts that could affect California red-legged frogs. Evidence of compliance with the recommended avoidance and minimization measures for California red-legged frog would be submitted to the City Natural Resources Manager on a quarterly basis. Implementation of identified mitigation measures would reduce potential impacts to California red-legged frog to a less than significant level.

Coast range newt, Southwestern pond turtle, two-striped garter snake. The proposed project would result in the use of construction equipment, generation of construction debris, removal vegetation, and worker foot-traffic, which may directly

impact Coast Range newts, southwestern pond turtle, and two-striped garter snake if present. Noise and vibration generated by construction activities associated with the proposed project may indirectly result in temporary abandonment of habitat adjacent to work areas. Subsequently, this disturbance of their habitat may increase the potential for predation and desiccation if Coast Range newts abandon shelter sites. In addition, erosion and sedimentation may indirectly affect Coast Range newt breeding sites, which would be considered a potentially significant impact.

Implementation of the identified mitigation measures would ensure that impacts to California Special Concern species or other special-status species are minimized by identifying and relocating (thus avoiding) the species prior to construction. Additional mitigation measures include implementation of a worker training program, which would ensure that workers are made aware of potential special-status species in the area and that appropriate actions are taken upon discovery of a special-status species, which when combined with preparation of an HMMP, water quality protection measures, and the compliance documented by a qualified biological monitor would reduce impacts to California Special Concern species such as Coast Range newts, southwestern pond turtles, and two-striped garter snakes to a less than significant level.

Special-status avian species and other nesting birds. Implementation of the proposed project would result in the disturbance of habitat suitable to support special-status avian species, potentially including Cooper's hawk, sharp-shinned hawk, white-tailed kite (*Elanus leucurus*), , loggerhead shrike, purple martin, yellow warbler, and yellow-breasted chat, as well as other nesting birds (Class Aves). These species are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Although riparian habitat occurs in the project area, it is not of suitable structure to support western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) or least Bell's vireo (*Vireo bellii pusillus*).

The proposed project may result in the trimming of riparian vegetation (no permanent removal is proposed), which may directly impact bird nests and any eggs or young residing in nests if present. In addition, construction-generated noise and ground-disturbing activities may indirectly alter perching, foraging, and/or nesting behaviors. Implementation of identified mitigation would ensure that vegetation removal in potential nesting habitats is monitored and documented by the biological monitor throughout the construction period (if occurring during the nesting bird season), which would reduce potential impacts to nesting habitats. Therefore, potential impacts would be mitigated to less than significant.

Special-status plant species. Based on the location of the project site and historic and continued intensive agricultural use, the potential for special-status plant species occurrence within the project alignment is low. Based on the results of seasonal botanical surveys, which were conducted by an SWCA biologist on April 8 and August 10, 2016 within the blooming period for plants with the potential to occur within the project area, no special-status plant species are present onsite. Therefore, no impacts to special-status plant species would occur.

Mitigation Measures: The City and County shall implement the following mitigation measures:

BR-1 Prior to commencement of construction the City/County shall retain a qualified biological monitor(s) to ensure compliance with avoidance and minimization measures. Monitoring will occur throughout the length of construction or as directed by the regulatory agencies. Full-time monitoring will occur during initial grading, vegetation removal, and erosion control installation. Monitoring may be reduced to part-time once construction activities are under way and the potential for additional impacts is reduced. Monitoring reports shall be submitted to the City/County, or its designee, on a quarterly basis or as specified by specific mitigation measures.

BR-2 During construction, the biological monitor(s) will ensure that the spread or introduction of invasive exotic plant species will be avoided to the maximum extent possible. When practicable, invasive exotic plants on the project site will be removed and properly disposed.

BR-3 Prior to commencement of construction, the City/County, or its designee, shall clearly flag or fence project site will be so that the contractor is aware of the limits of allowable site access and disturbance. Areas within the designated project site that do not require regular access will be clearly flagged as off-limit areas to avoid/discourage unnecessary damage to sensitive habitats or existing vegetation within the project site.

BR-4 Prior to commencement of construction, the City/County or its designee shall prepare a Hazardous Materials

(HAZMAT) Response Plan to allow for a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. During construction, all project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on site at all times during construction. The HAZMAT Response Plan shall allow the cleaning and refueling of equipment and vehicles occur only within a designated staging area, which shall be located at least 60 feet from wetlands, other waters, or other aquatic areas. This staging area will conform to best management practices (BMPs) applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles will be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

BR-5 Prior to commencement of construction, the City/County shall have a qualified arborist prepare a vegetation management plan that minimizes the trimming of trees to the extent feasible. To avoid the potential for accidental removal or unnecessary trimming of trees, trees to be trimmed shall be clearly flagged. Un-flagged trees shall not be removed or trimmed. All trimming shall be conducted by a qualified arborist.

BR-6 Prior to commencement of construction, the City/County shall prepare and incorporate into final construction documents an erosion control plan and stormwater pollution prevention plan (SWPPP) for the project. Provisions of these plans shall be implemented during and after construction as necessary to avoid and minimize erosion and stormwater pollution in and near the work area. The SWPPP shall include erosion control measures to be implemented during and after project implementation. Best management practices including, but not limited to, temporary construction fencing delineating the boundary of the 30 to 60-foot wide construction corridor, silt fencing, fiber rolls, and barriers (e.g., hay bales) will be installed between the project site and adjacent wetlands and other waters. No synthetic plastic mesh products shall be used in any erosion control materials. At a minimum, best management practices shall be checked and maintained by the contractor on a daily basis throughout the construction period, and the biological monitor shall check best management practices periodically, in addition to before and after rain events to ensure compliance. The contractor shall also apply adequate dust control techniques, such as site watering and use of soil stabilizers, during construction. The City/County or its designee shall ensure compliance with the SWPPP throughout the duration of the proposed project.

BR-7 Prior to commencement of construction, the City/County shall prepare a construction management plan that identifies the rules and requirements of the job site. The construction management plan shall reference other applicable plans (i.e., SWPPP, HAZMAT Response Plan, employee training program, etc.), identify construction hours, contact names and numbers, and other specific management requirements, including, but not limited to, the following:

a. During construction, trash will be contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas. All vegetation removed from the construction site shall be taken to a certified landfill to prevent the spread of invasive species. If soil from weedy areas (such as areas with poison hemlock or other invasive exotic plant species) must be removed off site, the top 6 inches containing the seed layer in areas with weedy species shall be disposed of at a certified landfill. Prior to removal, the City/County will coordinate with the agricultural landowner to ensure the soil does not consist of desired topsoil for agricultural crops.
b. During construction, no pets will be allowed on the construction site.
c. All other applicable biological measures referenced in this Initial Study that relate to field practices during construction.

BR-8 Prior to commencement of construction, City/County Public Works Department shall have a qualified biologist prepare and conduct a worker environmental training program. The environmental training program shall include descriptions of all special-status species with the potential to occur within the project area, their ecology, legal status, the need for conservation of the species, and what to do if one is observed. The environmental training program shall be subject to review and approval by the City /County or assigned designee. All construction personnel conducting work within habitat that potentially supports these species shall participate in the training program conducted by a qualified biologist. Evidence of participation in the environmental training program shall be submitted to the City/County on a quarterly basis.

BR-9 Prior to commencement of construction, the City/County shall have a qualified biologist conduct pre-construction surveys and regular surveys during construction, as determined by the qualified biologist, for Coast Range newts, southwestern pond turtles, and two-striped garter snakes and any other California Special Concern species or other special-status species. The City/County of San Luis Obispo shall obtain a letter of permission from the California Department of Fish and Wildlife (CDFW) to relocate identified California Special Concern species from work areas encountered during construction as necessary. A qualified biologist shall capture and relocate any California Special Concern species or other special-status species (if present) to suitable habitat outside of the area of impact. Observations of California Special Concern species or other special-status species shall be documented on California Natural Diversity Database forms and submitted to CDFW and the City /County, or its designee, upon project completion.

BR-10 Prior to commencement of construction, the City/County shall implement the following avoidance and minimization measures for California red-legged frog:

a. Prior to ground disturbance, a USFWS-approved biologist shall survey the project area no more than 48 hours before the onset of work activities. If any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move them from the site before work activities begin. The USFWS-approved biologist shall relocate the California red-legged frogs the shortest distance possible to a location that contains suitable habitat and will not be affected by the activities associated with the project. The USFWS-approved biologist shall maintain detailed records of any individuals that are moved (e.g., size, coloration, any distinguishing features, photographs [digital preferred]) to assist him or her in determining whether translocated animals are returning to the point of capture.
b. Prior to commencement of grading and construction, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and its habitat, the specific measures that are being implemented to conserve the California red-legged frog for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.
c. A USFWS-approved biologist shall be present at the work site until all California red-legged frogs have been removed (as applicable), workers have been instructed, and disturbance of the upland habitat has been completed. After this time, the City/County shall designate a person to monitor on-site compliance with all minimization measures as required under the Habitat Mitigation and Monitoring Plan.
d. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 60 feet (18 meters) from the riparian habitat or water bodies and not in a location from which a spill would drain directly toward aquatic habitat. The monitor shall ensure contamination of habitat does not occur during such operations.
e. Disturbed areas shall be revegetated with an assemblage of native, non-invasive plant species. Locally collected plant materials shall be used to the extent practicable. Invasive, exotic plants shall be controlled to the maximum extent practicable. This measure shall be implemented in all areas disturbed by activities associated with the project, unless that it is not feasible or modification of original contours would not benefit the California red-legged frog.
f. The total area of activity (i.e., construction corridor, staging area, access route) shall be limited to the minimum necessary, and delineated with flagging and/or temporary construction fencing.
g. To the maximum extent feasible, work shall be scheduled for the times of the year when impacts to the California red-legged frog would be minimal (i.e. avoid the breeding season, November through May, if possible).
h. Best management practices (BMPs) shall be implemented to control sedimentation during and after project implementation.
i. If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 0.2 inch (5 mm) to prevent California red-legged frogs from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction.
j. Water shall not be impounded in a manner that may attract California red-legged frog.
k. The use of herbicides is prohibited as the primary method to control invasive, exotic plants within the pathway alignment.

BR-11 The City and County shall obtain all necessary permits or authorizations from Federal and State Agencies, including the US Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and

Wildlife, or documentation that such permit and authorizations are not warranted, based on the final design of the project. Pursuant to Section 7 of the Endangered Species Act, formal consultation shall be initiated with the California Department of Fish and Wildlife, US Fish and Wildlife Service and/or the National Marine Fisheries Service for impacts to listed species (i.e. south-central California coast steelhead ESU).

BR-12 If any special-status species are observed in or near work areas during monitoring or construction, the City/County shall have a qualified biologist map, establish and mark off an exclusion zone, and avoid these species until the appropriate regulatory agencies (e.g., California Department of Transportation, US Fish and Wildlife Service, and California Department of Fish and Wildlife) are consulted for further mitigation options. Additional measures may include temporary halting of work, avoidance, relocation, or other measures as identified by the resource agencies, depending upon the specific species and its distribution.

BR-13 Prior to issuance of any permit, the City/County shall document on all final construction documents that vegetation trimming shall occur outside of the nesting season (as determined by qualified biologist), wherever possible, to minimize birds nesting within areas of disturbance during or just prior to construction. These timing requirements shall be confirmed by the City Natural Resources Manager/ County Environmental Coordinator or designee.

BR-14 If construction activities are proposed to occur during the typical nesting season (February 15 to August 31) within 200 feet (60 meters) of potential nesting habitat the City/County shall have a qualified biologist conduct pre-construction surveys for nesting birds (including swallows) in potential nesting habitat. Pre-construction surveys shall be conducted at least two weeks prior to construction and periodically during the construction period to determine presence/absence of nesting birds within the project area. The USFWS and/or the CDFW shall be contacted if any listed bird species are observed during surveys and consulted for additional guidance if nesting birds are observed within or near the boundaries of the project site. Nests, eggs, or young of birds covered by the Migratory Bird Treaty Act and the California Fish and Game Code shall not be moved or disturbed until the end of the nesting season or until young fledge, whichever is later, nor shall adult birds be killed, injured, or harassed at any time. Work activities shall be avoided within 100 feet (30 meters) of active bird nests and 200 feet (60 meters) of active raptor nests until young birds have fledged and left the nest. Readily visible exclusion zones shall be established by a qualified biologist in areas where active nests must be avoided. Results of the pre-construction surveys shall be submitted to the City/County, or its designee, upon completion and prior to construction.

Conclusion: Less than significant impact with mitigation.

b) & c) Implementation of the proposed project would not result in any direct impacts to San Luis Obispo Creek; no construction activities would occur within the bed or bank of the creek. Some trimming of riparian forest habitat may be necessary along the western edge of the proposed alignment; however, no permanent tree removal would occur. The proposed alignment would cross potential wetland habitat located between San Luis Obispo Creek and an existing residential neighborhood, at the City/County limit line. Construction activity within this potential wetland habitat would include vegetation removal, grading, and construction of the pathway. Up to approximately 5,000 square feet of this wetland habitat may be temporary and/or permanently affected, depending on the final design of the pathway. Impacts to this wetland habitat would be required to be mitigated onsite at a 1:1 ratio for temporary impacts and at a 2:1 ratio for permanent impacts, unless otherwise directed by regulatory agencies, pursuant to an approved Habitat Mitigation and Monitoring Plan (HMMP).

The proposed alignment would be located proximate to 35 black walnut trees and 12 coast live oak trees, which are located along the San Luis Creek riparian corridor. The project does not currently propose the removal of any mature trees; however, the root zones of these trees may be impacted and limbs may be trimmed during ground disturbance and construction of the path. Mitigation is identified below, which requires replacement of any trees removed at a 4:1 ratio, and planting of any trees impacted at a 2:1 ratio. Based on compliance identified mitigation, potential impacts to these species would be less than significant.

Construction activities, such as use of construction equipment, worker foot-traffic, and hazardous material spills, may directly result in temporary impacts to riparian vegetation along the corridor. Temporary impacts to riparian vegetation may also result from unintentional limb injury from construction equipment. Indirect root zone impacts from construction equipment are also a

concern but are not expected, as most cuts and fills associated with grading will be less than 1 to 2 feet. Increased erosion and sedimentation generated during construction may indirectly result in temporary impacts to riparian vegetation along the corridor.

Implementation of the proposed project may result in the introduction of invasive or exotic plant species, which could compete with existing sensitive native plant species, as well as nearby agricultural crops. Through implementation of the HMMP, the potential to introduce invasive species would be reduced to a less than significant level.

Implementation of identified mitigation measures would ensure that any impacts to jurisdictional habitat is mitigated through preparation of an HMMP and federal and state resource agency permitting and approvals. Temporary impacts to jurisdictional vegetation would be required to be mitigated at a 1:1 ratio, and permanent impacts would be mitigated at a 2:1 ratio, unless otherwise directed by regulatory agencies. No net loss of wetlands is permitted. Mitigation would be primarily in the form of restoration and enhancement of in-kind habitat located within the project area. The HMMP would detail mitigation requirements consistent with approval standards and requirements of the CDFW and the RWQCB (if required). The HMMP will be prepared when full construction plans are prepared and will be finalized through the permit review process with regulatory agencies. Coordination with the CDFW and the RWQCB, the acquisition of appropriate permits and agreements, and development of the HMMP will need to be completed prior to project implementation. Implementation of identified mitigation measures would reduce impacts to jurisdictional areas that fall under the jurisdiction of the USACE, CDFW and/or the RWQCB to a less than significant level.

Mitigation Measures: The City and County of San Luis Obispo will implement the following mitigation measures:

BR-15 Prior to commencement of construction, the City/County or its designee shall prepare a comprehensive Habitat Mitigation and Monitoring Plan (HMMP), for review and approval by the City /County, that specifies final mitigation requirements for impacts to vegetation and natural habitats including the requirements of permits and consultation with the resource agencies (as applicable based on the final design). The HMMP shall identify specific mitigation sites based on the specific mitigation acreage required by regulatory agencies during the permitting process and as identified below. The HMMP shall be consistent with federal and state regulatory requirements and reflect any regulatory permit conditions, as required. The City/County or its designee shall ensure implementation of mitigation requirements of the HMMP during construction and immediately following project completion. Measures identified in the final HMMP shall include at a minimum the following:

a. On-site mitigation at the following minimum ratios, unless determined otherwise by a regulatory agency, which shall ensure no net loss of habitat:
b. On-site mitigation (within areas in or near the San Luis Obispo Creek watershed) for permanent impacts to jurisdictional areas would be implemented at a minimum 2:1 ratio;
c. Off-site mitigation for permanent impacts to jurisdictional areas would be implemented at a 3:1 ratio; and
d. On-site and/or off-site mitigation for temporary impacts to jurisdictional areas would be implemented at a 1:1 ratio.
e. Any loss of southern California black walnut trees and coast live oak trees shall be mitigated at a 4:1 restoration ratio for every walnut or oak tree removed and at a 2:1 ratio for every walnut or oak tree trimmed or otherwise impacted but not removed. If more than 25 percent of a walnut or oak tree must be trimmed, it shall be mitigated at a 4:1 restoration ratio.
f. Implementation of the restoration and mitigation activities will be conducted or overseen by an agency-approved restoration specialist. The restoration specialist will oversee site preparation and plant installation to ensure conformity with the approved HMMP. Restoration and mitigation activities shall include, but are not limited to, plant salvage, site preparation and planting, installation of irrigation, and preparation and implementation of maintenance and monitoring plans.
g. The maintenance plan shall address watering requirements, weed control, herbicide use, vandalism, and remedial plantings and fertilizing. The monitoring plan shall identify a monitoring schedule, performance goals, other attributes to monitor, and reporting requirements.

e) The City Zoning Regulations identify a 50-foot setback from San Luis Obispo Creek (Section 17.16.025). Subsection G of this zoning code chapter identifies specific exceptions to creek setbacks, provided the use does not extend beyond the top of

bank into the creek channel, will not cause the removal of native riparian vegetation, will not reduce any flooding capacity, will not occupy more than half of the setback area, and the use is consistent with other development standards identified in the Zoning Code. Allowable exceptions include pedestrian and bicycle paths and fences. Discretionary findings required for the pathway setback exception include:

i. The location and design of the feature receiving the exception will minimize impacts to scenic resources, water quality, and riparian habitat, including opportunities for wildlife habitation, rest, and movement; and

ii. The exception will not limit the city's design options for providing flood control measures that are needed to achieve adopted city flood policies; and

iii. The exception will not prevent the implementation of city-adopted plans, nor increase the adverse environmental effects of implementing such plans; and

iv. There are circumstances applying to the site, such as size, shape or topography, which do not apply generally to land in the vicinity with the same zoning, that would deprive the property of privileges enjoyed by other property in the vicinity with the same zoning; and

v. The exception will not constitute a grant of special privilege –an entitlement inconsistent with the limitations upon other properties in the vicinity with the same zoning; and

vi. The exception will not be detrimental to the public welfare or injurious to other property in the area of the project or downstream; and

vii. Site development cannot be accomplished with a redesign of the project; and

viii. Redesign of the project would deny the property owner reasonable use of the property. ("Reasonable use of the property" in the case of new development may include less development than indicated by zoning. In the case of additional development on an already developed site, "reasonable development" may mean no additional development considering site constraints and the existing development's scale, design, or density.) (Section 17.16.025.G.4).

The proposed project appears to meet these findings, and the pathway would be a public project, which is sited to minimize impacts to agricultural resources and visual resources as seen from public roadways. Mitigation is identified for potential impacts to biological and hydrological resources during construction, and protection of floodways and public safety during flood events. In the long-term, the project would not adversely affect sensitive resources. The project is consistent with City and County plans and documents, which identify a bike path in this location (refer to the City of San Luis Obispo Bicycle Transportation Plan, Segment: LOVR to Octagon Barn, dated November 5, 2013).

The City COSE states that the City will maintain creek setbacks to include "an appropriate separation from the physical top of bank, the appropriate floodway as identified in the Flood Management Policy, native riparian plants or wildlife habitat and space for paths called for by any City adopted plan" (City COSE Section 7.7.9). The County COSE (Implementation Strategy BR 4.2.1) identifies a 50-foot setback from the top of the bank of any stream or outside the dripline of riparian vegetation, whichever distance is greater. The County COSE states that "public trails may be located within this required setback only if trail design and construction avoid or mitigate environmental impacts" (Implementation Strategy BR 4.2.1). The County Agriculture Element (Policy AGP26: Streams and Riparian Corridors) defines creek setback requirements, including a 30-foot grading and building setback from the top of the stream bank and prohibitions on the removal of riparian vegetation within 30 feet of the top of the stream bank. The County allows for adjustments when such setbacks would have a significant negative impact on the agricultural viability of a site and the adjustments are acceptable to the Regional Water Quality Control Board.

Based on the location and nature of the project, and implementation of identified mitigation, the project appears to be consistent with existing regulations and policies in place to protect and preserve biological resources. Therefore, potential impacts would be less than significant.

Mitigation: Implement all BR mitigation measures.

Conclusion: Less than significant impact with mitigation.

f) The project site is not located in an area subject to an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Conclusion: No impact.

Implementation of the proposed project would result in potentially significant impacts to biological resources, primarily during the construction phase. Implementation of identified mitigation measures, including compliance with existing federal, state, and local regulations, biological monitoring and reporting to ensure compliance with mitigation measures, and restoration of disturbed habitats at prescriptive ratios, would reduce potential adverse effects to less than significant.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	3, 4, 13, 14, 30		--X--		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)	3, 4 13, 14, 30		--X--		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	2, 3, 4, 30		--X--		
d) Disturb any human remains, including those interred outside of formal cemeteries?	3, 4, 13, 14, 30		--X--		

Evaluation

Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years, and that Native American use of the central coast region may have begun during the late Pleistocene, as early as 9000 B.C., demonstrating that historical resources began their accumulation on the central coast during the prehistoric era. The City is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The Obispeño Chumash occupied much of San Luis Obispo County, including the Arroyo Grande area, and from the Santa Maria River north to approximately Point Estero.

The project site is considered to be within an "archeologically sensitive area" because it is proximate to San Luis Obispo Creek. A Phase I Cultural Resources Survey (SWCA 2015) was prepared for the project including a cultural resources records search, a Native American Sacred Lands File search, an archaeological survey of the project area, and preparation of the technical report documenting the results of the inventory and providing management recommendations. Based on consultation with Native American tribal representatives, the project is located in an archaeologically sensitive area, and monitoring during construction is requested, in addition to consultation with native tribes during preparation of any educational cultural resource signage associated with the project (if proposed).

The records search revealed that 24 cultural resources studies have been conducted within a 0.25-mile radius of the project area. No previously identified archaeological resources are located within the project area; however, abundant naturally occurring chert cobbles, which were commonly utilized as a prehistoric toolstone, were observed throughout the project area. Although none of the observed chert cobbles exhibited evidence of prehistoric modification, their presence, combined with the project area's proximity to a previously identified prehistoric archaeological site, San Luis Obispo Creek, and Froom Creek, could indicate an area of elevated archaeological sensitivity.

One historic resource, a road segment of Old State Route 2, intersects the southern portion of the project corridor. This historic segment of highway was in use from 1915–1928, but was then subsequently abandoned after a new highway route was constructed. This segment of Old State Route 2 was documented and evaluated by JRP Historical Resources Consulting (2006) and was determined ineligible for listing on both the California Register of Historical Resources and the National Register of Historic Places. Given its ineligible status, this feature does not meet the criteria for a historic property, and no further consideration or impact analysis under the California Environmental Quality Act (CEQA) is warranted. The field survey of the project area and the Sacred Lands File were negative for the presence of archaeological resources.

One historic resource, the Old State Route 2 Stornetta Bridge, is located in the project area, approximately 100 feet from the proposed project alignment. The Stornetta Bridge was constructed in 1915 and abandoned for public use along with State Route

2 in 1928. The bridge was designed by Leonard & Day and is one of only four "canticrete" type bridges known to exist in California. Based on a historic evaluation of the bridge conducted by JRP, the bridge retains sufficient integrity and appears eligible under NRHP Criterion C and CRHR Criterion 3 as an important work of a significant designer (JRP 2006).

As documented in the City's Land Use and Circulation Element EIR (City of San Luis Obispo 2015), the only fossil resources likely to occur in the vicinity are of Quaternary (Pleistocene) age. The Quaternary is the most recent of the three Periods of the Cenozoic Era in the geologic time scale. It follows the Tertiary Period, spanning from about 2,588,000 years ago to the present. The Quaternary includes two geologic epochs: the older Pleistocene and the younger Holocene, which began approximately 10,000 ybp (years before present). The Land Use and Circulation Element EIR notes three vertebrate localities along the coast within 9 miles of the city. These localities occur in Pleistocene fluvial deposits overlying marine terraces, and include assemblages of the Rancholabrean mammals Equus sp. and E. occidentalis (horse); Camelops sp. and C. hesternus (camel); Bison antiquus and B. latifrons (bison), and Mammut americanum (mammoth). The geologic formation underlying the project site is Qal (alluvium), which is considered a Quaternary (Recent) formation, and is unlikely to produce fossils due to age. The project site is not located in an area known to support significant paleontological resource findings.

a) As noted above, the affected road segment of Old State Route 2 was determined to be ineligible for listing on the state and federal registers. This roadway is currently used as part of the agricultural operation, and this use would continue during operation of the pathway. Because the roadway does not meet CEQA criteria for a historic property, no significant impact would occur. With regards to the Stornetta Bridge, based on the location of the project alignment, no activity would occur within approximately 100 feet of this bridge. Therefore, no significant direct impacts would occur; construction plans shall be required to note avoidance of the bridge. Based on the nature of the project (pathway), use of visually compatible fencing, and limited amount of grading required to construct the pathway, protection of riparian vegetation within the San Luis Obispo Creek Corridor, implementation of the project would not conflict with the bridge setting. Therefore, potential indirect effects would be less than significant.

Mitigation Measures: The City and County shall implement the following measure to ensure avoidance of a historic property:

CR-1 Prior to commencement of construction, final grading and construction plans shall delineate the extent of the Stornetta Bridge and a minimum 50-foot buffer, and shall prohibit the use of construction equipment and storage of materials on the bridge and within the 50-foot buffer area. The 50-foot buffer shall be delineated in the field using temporary construction fencing and/or flagging.

Conclusion: Less than significant with mitigation.

b), c) & d) No archaeological resources, as defined by CEQA, were identified within or adjacent to the project area. However, the results of the archival research and field survey, and comments from local Native American tribal members, indicate the area is sensitive for the presence of previously undocumented (i.e., buried and/or obscured) archaeological resources. Therefore, identified mitigation includes construction monitoring conducted by a qualified archaeologist and Native American during ground disturbing activities, including but not limited to removal of ground cover, separation of top soil, and grading. In the event that archaeological resources are exposed during project implementation, work would stop in the immediate vicinity, and an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards (National Park Service 1983) shall evaluate the find and recommend appropriate mitigation measures. In the event that human remains are discovered, State of California Health and Safety Code Section 7050.5 shall be followed. Based on implementation of identified mitigation, potential impacts would be less than significant.

Based on the location of the project, and minimal depth of ground disturbance, the potential for significant paleontological resource discovery is low. In in unanticipated event of discovery, identified mitigation including protection of the resource for further evaluation and treatment is identified below.

Mitigation Measures: The City and County shall implement the following mitigation measures:

CR-2 Prior to commencement of construction, the City/County shall ensure the preparation of a Cultural Resources

Monitoring Plan, prepared by a qualified archaeologist. The intent of this Plan is to monitor all earth-disturbing activities. The Monitoring Plan shall include at a minimum:

a. List of personnel involved in the monitoring activities;
b. Inclusion of involvement of the Native American community, as appropriate;
c. Description of how the monitoring shall occur;
d. Description of frequency of monitoring (e.g., full-time, part time, spot checking);
e. Description of what resources are expected to be encountered;
f. Description of circumstances that would result in the halting of work at the project site (e.g., What is considered "significant" archaeological resources?);
g. Description of procedures for halting work on the site and notification procedures; and
h. Description of monitoring reporting procedures.

CR-3 If, during the course of constructing and implementing the proposed project, archaeological, paleontological, or cultural resources (i.e., prehistoric sites, historic sites, or isolated artifacts and features) are discovered, the contractor shall halt all ground disturbing activities immediately within 50 feet of the discovery, the City/County shall be notified, and a professional archaeologist, architectural historian, or paleontologist (depending on the nature of the finding) shall be retained to determine the significance of the discovery. The City/County shall consider mitigation recommendations presented by the professional, and the City/County shall consult and agree upon implementation of a measure(s) that they deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The City/County shall be required to implement any mitigation necessary for the protection of archaeological, paleontological, and cultural resources.

CR-4 In the event of human burial discovery, no further disturbance shall occur within 100 feet of the finding until the County of San Luis Obispo (County) Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission within 24 hours, which will determine and notify a Most Likely Descendant (MLD). The City/County shall allow the MLD to complete an inspection of the site (typically within 48 hours of notification) and shall comply with MLD recommendations, which may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

CR-5 Prior to development of Native American interpretive materials or educational signage associated with the project, the City/County shall coordinate with local Native American tribal representatives regarding appropriate language and educational information to be included in the materials or on the signage.

Conclusion: Less than significant impact with mitigation.

No significant cultural resources were identified during referenced surveys; however, there is a potential for unknown sub-surface resources. Based on compliance with identified mitigation, including construction monitoring and avoidance of a known historic property, potential impacts would be mitigated to less than significant.

6. GEOLOGY AND SOILS. Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:	2, 3 14, 15, 16			--X--	
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				--X--	

Mines and Geology Special Publication 42.					
II. Strong seismic ground shaking?				--X--	
III. Seismic-related ground failure, including liquefaction?				--X--	
IV. Landslides?				--X--	
b) Result in substantial soil erosion or the loss of topsoil?	2, 3, 7, 9, 26, 33			--X--	
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?	2, 3			--X--	
d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial risks to life or property?	2, 3, 7			--X--	
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?					--X--

Evaluation

The project site is located within the Coast Range Geomorphic Province, which extends along the coastline from central California into Oregon. This region is characterized by extensive folding, faulting, and fracturing of variable intensity. In general, the folds and faults of this province comprise the pronounced northwest trending ridge-valley system of the central and northern coast of California. There are no known fault lines on the site or in the immediate vicinity; however, there are active faults within 5 miles of the site. The fault system is within the Los Osos Valley area and is known as the Los Osos/Hosgri fault. Other active faults in the region include the San Andreas fault zone (approximately 30 miles to the northeast), the Nacimiento fault (approximately 12 miles to the northeast), and the San Simeon-Hosgri fault (approximately 12 miles to the west). The site is in Seismic Zone 4, a seismically active region of California and strong ground shaking should be expected during the life of proposed structures. Structures must be designed in compliance with seismic design criteria established in the Uniform Building Code and City/County Codes. The project site is generally level, and is not subject to potential geologic hazards including landslides and slope stability. Potential hazards include expansive soils and liquefaction, due to proximity to San Luis Obispo Creek. Grading will be conducted pursuant to the City's/County's grading regulations, which would adequately address potential soil concerns.

a), c) There are no known fault lines on the site; however, there are capable (i.e. active) faults within five miles of the project site, including a capable fault approximately 250 feet to the west. The project includes no habitable structures, and based on compliance with existing regulations and standards, which will be verified by the City/County Building Inspector, potential effects as a result of seismic activity would be less than significant, and no additional measures are necessary.

Conclusion: Less than significant impact.

b) The project site is nearly level, onsite soils have a low erosion hazard rating, and substantial grading is not expected (approximately 3.86 acres). Exposure of soils to rainwater and other runoff may result in erosion and down-gradient sedimentation during construction and post-construction if soils are not stabilized. This could result in an adverse effect to San Luis Obispo Creek and the adjacent agricultural field. As noted above in Section 2 (Agricultural Resources), prior to construction, the City/County would set aside the top soil for the agricultural operator.

Development of the portion of the project site within the city limits is subject to the City's Storm Water Management Program, which was required under the State Water Resources Control Board (SWRCB) Phase II Storm Water Regulations. Under the City Program, Best Management Practices (BMPs) and Pollution Prevention Methods (PPMs) are required to be incorporated into grading and construction plans to protect water quality by minimizing or controlling the amount of pollutants and runoff exiting the site, and by eliminating the use of polluting materials and/or avoiding exposure of potential pollutants to rainwater and other runoff.

Pursuant to the Waterway Management Plan Drainage Design Manual (2003), a detailed erosion control plan is required because the project would be located within 100 feet of a blue line stream (San Luis Creek). The plan is required to include a written narrative and detailed site plan, incorporating the following components outlined below (noting these measures are described in greater detail in the Manual):

- Gravel construction entrance at each vehicle access point
- Catch basin protection (filter system or catch basin) for sediment control
- Sediment filters/barriers, required for projects constructed during the period of October 15 through April 15 to ensure that all runoff from the construction site is contained – this may include silt fences and straw wattles
- Use of plastic sheeting/tarp to protect small, highly erodible areas, or temporary stockpiles of material - if plastic sheeting is used, the path of concentrated flow from the plastic must be protected
- As far as is practicable, existing vegetation shall be protected and left in place and work areas shall be carefully located and marked to reduce potential damage
- Where existing vegetation has been removed, or the original land contours disturbed, the site shall be revegetated, and the vegetation established, as soon as practicable, but no later than October 15th
- Vegetative ground cover shall be planted on or before September 15 with the ground cover established by October 15 – as an alternative, if a protective ground cover is not established by October 15, the open areas shall be protected through the winter with straw mulch, erosion blankets, or other method(s) approved by the City or County
- Application of seeding, pursuant to the Manual or as recommended by a California Licensed Landscape Architect or a Certified Professional soil Erosion and Sediment Control Specialist, or a City or County approved biologist
- Onsite erosion and sedimentation control monitoring and compliance/remediation documentation
- Incorporation of erosion and sedimentation control notes on project plans.

Development of the portion of the project site within the County is subject to the County Code and County Land Use Ordinance (LUO). County LUO Section 22.52.110 includes a provision to prepare a drainage plan to minimize potential drainage impacts. When required, this plan addresses measures such as constructing on-site retention or detention basins or installing surface water flow dissipaters. This plan would also need to show that the increased surface runoff would have no more impacts than that caused by historic flows. This site is located in an area that is subject to the Central Coast Regional Water Quality Control Board (RWQCB) Post-Construction Requirements for stormwater management identified in County Code Chapter 19.09 (Building and Construction Ordinance) and County LUO Section 22.10.155 (Stormwater Management).

Sedimentation and erosion control measures that would be required for the project during construction may include, but not be limited to: scheduling ground disturbance to avoid the rainy season (if feasible), use of hydroseeding, planting, and mulch to stabilize soils, dust control to stabilize stockpiles, unpaved roads, and graded areas, protection of storm drain inlets, use of sediment traps, construction of a stabilized page of aggregate and filter fabric at the construction access entrance, street sweeping, and use of silt fencing, sand/gravel bags, and fiber rolls. All construction projects in the city require the installation, maintenance, routine inspection (i.e. weekly, before predicted rain events, after rain events and during prolonged rain events) and the repair or replacement as needed BMPs throughout the course of the construction project in order to protect local water quality. Most BMPs (i.e. concrete / tool washouts and street sweeping) are required year long and others are specifically required during the rainy season (i.e. October 15th through April 15th) or prior to a predicted rain event, even if that rain event is predicted during the summer months.

Enforcement of stormwater regulations occurs all year long. For sites with exposed soil, a Project Stop Work Notice may be issued at this time unless the contractor/building is actively installing the erosion and siltation control measures. After October 15th, a Project Stop Work Notice will be issued for all work except the installation of erosion control measures, and the Regional Water Quality Control Board will be notified. Therefore, based on compliance with existing state and local regulations, potential impacts as a result of erosion and down-gradient sedimentation would be less than significant, and no additional mitigation measures are necessary.

Conclusion: Less than significant impact.

d) There is a potential for expansive material at the project site. Based on compliance with existing regulations, which will be verified by the City and County prior to construction, potential impacts would be less than significant.

Conclusion: Less than significant impact.

e) Development does not require or include wastewater treatment facilities or a connection to the City's collection system; no impact would occur.

Conclusion: No impact.

As noted above, the proposed development is subject to existing codes and regulations, which address geologic and soils hazards. Development would be constructed consistent with recommendations as determined by the project engineer and the City/County Building Inspector.

7. GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	2, 11			--X--	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	2, 11, 18, 19			--X--	

Evaluation

Human activities, such as fossil fuel combustion and land use changes release carbon dioxide (CO_2) and other compounds, cumulatively termed greenhouse gas (GHG) emissions. GHGs are effective in trapping infra-red radiation which otherwise would have escaped the atmosphere, thereby warming the atmosphere, the oceans, and earth's surface. GHGs are any gas that absorbs infrared radiation in the atmosphere. AB 32, the "California Global Warming Solutions Act of 2006" codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. GHGs include the following gases: CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). In California, the main sources of GHG emissions are from the transportation and energy sectors. Potential impacts of climate change in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CalEPA, April 2010). Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

In 2008, the City of San Luis Obispo conducted a baseline GHG emissions inventory, which was followed by adoption of a Climate Action Plan (2012 CAP) for reducing greenhouse gas emissions. The CAP includes a GHG emissions reduction target and emissions reduction strategies designed to help the City achieve that target. The adopted target is a reduction of community-wide emissions to 1990 levels by 2020, consistent with AB 32. The 2012 CAP identifies strategies to guide the development and implementation of GHG reduction measures in the City of San Luis Obispo and quantifies the emissions reductions that are anticipated to result from these strategies. Community GHG reduction strategies are divided into six sectors: buildings, renewable energy, transportation & land use, water, solid waste, and parks & open space. The GHG emissions forecast in the 2012 CAP shows that implementation of all of the strategies in the 2012 CAP would achieve a 15% reduction from baseline levels by 2020, which would meet required AB 32 State reduction goals. Having an adopted CAP allows the City of San Luis Obispo to streamline the CEQA review process of certain development projects – the CAP serves as the City's qualified GHG reduction plan because it contains the following required plan elements:

- Community-wide GHG emissions inventory and "business-as-usual" forecast of 2020 community-wide GHG emissions;
- GHG reduction targets consistent with AB 32 (i.e. a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable);
- Analysis of local and state policies and actions that may impact GHG emissions within the jurisdiction;
- Quantification of GHG reduction measures demonstrating that, if implemented, the GHG reduction targets will be met;
- Implementation and monitoring strategy and timeline; and
- Adequate environmental review of the CAP.

Incorporation of these plan elements allows the CAP to be used in the cumulative impacts analysis of projects where the City of San Luis Obispo is the lead agency. As described in the 2012 CAP, to analyze a project's consistency with the CAP, "the environmental document for the project must identify those requirements specified in the CAP that apply to the project, and if those requirements are not otherwise binding or enforceable, should be incorporated as mitigation measures applicable to the project (CEQA 15183.5b)." The City is in the process of developing a mitigation matrix for projects that exceed specified GHG thresholds. The matrix will include quantifiable CAP reduction measures consistent with SB 97 direction. The proposed project's consistency with the 2012 CAP is analyzed qualitatively against State and local GHG reduction policies, and the applicable implementation strategies contained in the 2012 CAP. The City of San Luis Obispo has not yet adopted GHG emissions thresholds for use in CEQA documents. In March 2012, the SLOAPCD adopted CEQA thresholds for GHG emissions in order to achieve goals outlined in the County's EnergyWise Plan. In addition the 2014 LUCE includes policies in place to minimize cumulative GHG emissions resulting from build-out of the City. There are three thresholds that can be used to evaluate the level of significance of GHG emissions impacts for residential and commercial projects. The three thresholds are described below:

- Qualified GHG Reductions Strategies. A project would have a significant impact if it is not consistent with a qualified GHG reduction strategy that meets the requirements of the State CEQA Guidelines. If a project is consistent with a qualified GHG reduction strategy, it would not have a significant impact; or
- Bright-Line Threshold. A project would have a significant impact if it exceeds the "bright-line threshold" of 1,150 metric tons CO2E/year; or
- "Efficiency" Threshold. A project would have a significant impact if the efficiency threshold exceeds 4.9 metric tons of CO2E/service population/year. The service population is defined as the number of residents plus employees for a given project.

a) Construction and development of the project would generate GHG emissions as a result of construction equipment operation, landscape and pathway maintenance. As noted in the Air Quality section of this Initial Study, emissions modeling was conducted using CalEEMod. Construction of the project would generate 37.9 metric tons (per year), which is well below the APCD's threshold of significance of 1,150 metric tons. Operational GHG emissions would be negligible, based on the nature of the project and lack of a permanent staging area. Greater use of the bikeways in San Luis Obispo County, such as the Bob Jones Pathway, may encourage some commuters who currently drive to instead walk or bicycle to their workplace, thereby offering commuters saved resources and less traffic congestion. The project provides an important connecting segment of the Bob Jones pathway, which has a small potential to reduce vehicle use in the area. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

b) The proposed project would result in development consistent with the anticipated growth under the inventory and assumptions of the 2012 Climate Action Plan (CAP), because the project is not growth inducing, would not increase land use intensity, and does not include any features that require energy to operate. Therefore, GHG emissions from the project would not conflict with California's commitment to GHG reduction under AB 32.

Conclusion: Less than significant impact.

As noted above, the project would not result in a significant impact related to GHG emissions, and no mitigation is required.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				--X--	
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?	20, 21			--X--	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	2		--X--		
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?	20, 21			--X--	
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 for people residing or working in the project area?	9, 22, 23			--X--	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				--X--	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	24			--X--	
h) Expose people or structures to a significant risk of-loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	2, 15			--X--	

Evaluation

a) Construction and operation of the project would not require routine transport, use, or disposal of hazardous materials; therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

b) Construction of the proposed project would require the use of fuels and materials; if spilled, these could result in a hazard to the public and the adjacent agricultural operations. In addition to compliance with state and local water quality regulations (refer to Sections 6 and 9 of this Initial Study), the applicant would comply with existing regulations requiring the development and implementation of a Storm Water Pollution Prevention Plan. Implementation of this plan would include regular inspection of equipment and materials, and feasible measures to quickly contain and clean up an accidental spill or leak, including removal, transport, and disposal of potentially contaminated soils and clean-up materials at an approved facility. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

c) The portion of the proposed project closest to the Montessori Children's School is just over 1,000 feet. The School is

located on the southern corner of the intersection between Los Osos Valley Road and South Higuera Street. Also, most of the trail is within 1,000 feet of the residential neighborhood within the city limits. Potential air emissions are addressed in Section 3 Air Quality, which limit the use of idling equipment within 1,000 feet of sensitive receptors. Operation of the project would not emit hazardous materials or emissions. No other hazardous emissions, handling of hazardous or acutely hazardous materials, substances, or waste are expected. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact with mitigation (refer to Section 3 Air Quality).

d) Based on review of the California Department of Toxic Substances Control EnviroStor and California State Water Board Geotracker databases (accessed November 2, 2015), and review of the California Toxic Substances Control Cortese List, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; however, there are clean-up sites in the area. There is a Cleanup Program Site associated with Unocal Old Pipeline No. 2 (SLO607995940) at 4325 South Higuera Street, located approximately 900 feet from the alignment. This case is designated as Completed and Closed by the SWRCB. Based on review of the Department of Toxic Substances Control (DTSC) Envirostor database, a State Response site, San Luis Obispo PCE Plume (60001343) located approximately 500 feet northwest of the northern terminus of the proposed pathway. The extent of the potential area of concern extends from Highway 1 and Marsh Street to Los Osos Valley Road and Higuera Street. DTSC identified seven public water supply wells that have been impacted by tetrachloroethylene (also known as perchloroethylene or PCE), a compound historically used by dry cleaners. Three of these wells have been contaminated at levels exceeding the MCL of 5.0 micrograms per liter (ug/l) established by the CDPH and the United States Environmental Protection Agency (US EPA). The clean-up site has been active since September 24, 2010. Based on the location of the project, and nearly level topography (which would minimize grading and section cuts), the project would not result in the exposure of potentially contaminated water, and does not include any uses or features that could adversely affect clean-up operations. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

e), f) The project site is subject to the Airport Land Use Plan (ALUP, amended 2005) and is located within the County Airport Review Area. The project site is located within Airport Land Use Plan Aviation Safety Area S-2, and is located approximately 1.65 miles west of the San Luis Obispo County Airport active runways. Safety Area S-2 is defined as areas with aircraft operations at 501 to 1,000 feet above ground level. Potential aviation safety hazards in this area include mechanical failures, fuel exhaustion, loss of control during turns from downwind to base legs or from base to final legs of the traffic pattern, stall/spin incidents during engine-out maneuvers in twin engine aircraft, and midair collisions, circle-to-land instrument approaches, and extensive student practice flights. The ALUP notes that the overall level of aviation safety risk is considered to be lower than that in other areas (i.e., S-1, Runway Protection Zone) (ALUP 2005).

The ALUP provides development standards for Aviation Safety Compatibility. If projects are consistent with the ALUP, then it can be assured that potential impacts are reduced to a less than significant level. Based on ALUC Table 7, the maximum density of non-residential persons/acre is 150. Based on the nature of the project, it is unlikely that over 150 persons would be located within this pathway segment at one time, and no habitable structures are proposed. The project does not include any features that could interfere with aircraft, or impede an emergency landing. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

g) Based on review of the City of San Luis Obispo Local Hazard Mitigation Plan, the proposed project would not conflict with or impair implementation of the plan. The project would not impede emergency access, and would provide safer access by bicycle. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

h) The project site is located within a moderate fire severity area. The proposed project would be constructed consistent with the California Building Code and Fire Code, and would be reviewed and inspected for compliance by the City/County Fire Department prior to use. The site design includes access suitable for emergency responders. Therefore, potential impacts related to fire would be less than significant.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Conclusion: Less than significant impact.

As proposed, the project would not be exposed to or create a significant hazard to occupants or the public. Standard mitigation related to construction related emissions proximate to sensitive receptors would be implemented to reduce potential impacts to less than significant.

9. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements?	2, 9		--X--		
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	2, 25			--X--	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?	2, 7, 9			--X--	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	2, 9, 26, 27			--X--	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	2, 9			--X--	
f) Otherwise substantially degrade water quality?	2, 9		--X--		
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?					--X--
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	2, 9, 26, 27		--X--		
i) Expose people or structures to significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	2, 9, 26, 27		--X--		
j) Inundation by seiche, tsunami, or mudflow?	2				--X--

Evaluation

Water Supply. The proposed project does not require the use of water supplies during operation. Construction of the project would require use of the City's recycled water supply for dust suppression, soil compaction, and establishment of groundcover or landscaping. In October 2006, the City completed construction of a Water Reuse Project, which included eight miles of distribution pipelines and improvements to the City's Water Reclamation Facility. In 2013, 176.82 acre feet of recycled water was used for landscape irrigation for several City parks, the Laguna Lake Golf Course, a middle school, landscaping along U.S. 101, and other landscape medians.

Water Quality. Construction of the project would require over one acre of ground disturbance; therefore, preparation and implementation of a RWQCB-approved SWPPP is required. The SWPPP would identify potential sources of pollution, and include measures to minimize discharge of pollutants into stormwater and protect surface and groundwater. Development of the portion of the project site within the city limits is subject to the City's Storm Water Management Program, which was required

under the SWRCB Phase II Storm Water Regulations. Under the City Program, BMPs and PPMs are required to be incorporated into grading and construction plans to protect water quality by minimizing or controlling the amount of pollutants and runoff exiting the site, and by eliminating the use of polluting materials and/or avoiding exposure of potential pollutants to rainwater and other runoff.

Pursuant to the Waterway Management Plan Drainage Design Manual, a detailed erosion control plan is required because the project would be located within 100 feet of a blue line stream (San Luis Creek) (refer to Section 6 Geology and Soils for additional information regarding this requirement). Within County jurisdiction, a sedimentation and erosion control plan is required for all construction and grading projects (County LUO Section 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts (refer to Section 6 Geology and Soils for additional information regarding erosion and sedimentation control).

Drainage and Flooding. The entire project site is located within a 100-year flood zone, based on the Waterway Management Plan (2003) and Federal Emergency Management Agency (FEMA) maps (refer to Attachment 3, Habitat and Flood Zone Map). The project is subject to compliance with the Waterway Management Plan Drainage Design Manual and Floodplain Management Regulations, and the Central Coast RWQCB's Post-Construction Stormwater Regulations (effective March 6, 2014). In accordance with City Policy, projects must demonstrate that: the project would not significantly increase the floodwater surface elevations for the 100-year storm, and the project would not significantly decrease floodplain storage volume onsite.

City LUE Policies 6.6.5, 6.6.6., and 6.6.7 require the following: use of methods to facilitate rainwater percolation for outdoor hardscaped areas where practical to reduce surface water runoff and aid in groundwater recharge; project designs must minimize drainage concentrations and impervious coverage; and, appropriate runoff control measures shall be included that minimize discharge of urban pollutants into area drainages. Policy 6.6.8 requires implementation of erosion control measures. Consistent with these policies and the Low Impact Development guidelines required in the City's Storm Water Management Program, new construction will be required to utilize Best Management Practices in handling site drainage and runoff.

Within the City, the project would be subject to the City Zoning Code Chapter 17.84: Floodplain Management Regulations. The purpose of this chapter is to: "promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas by legally enforceable regulations applied uniformly throughout the community to all publicly and privately owned land within flood-prone, mudslide [i.e., mudflow] or flood-related erosion areas". The Code requires that the City prohibit "fill, new construction, substantial improvements, and other development, unless certification by a registered civil engineer is provided demonstrating that the proposed encroachment shall not result in any increase in flood levels during the occurrence of the base flood discharge" (Section 17.84.050.F Provisions for flood hazard reduction, Floodways).

Development of the portion of the project site within the County is subject to the County Code and County Land Use Ordinance (LUO). This site is subject to stormwater management requirements identified in County Code Chapter 19.09 (Building and Construction Ordinance) and County LUO Section 22.10.155 (Stormwater Management). In addition, the project site is located within the County Flood Hazard (FH) combining designation, and is subject to County LUO Section 22.14.060 (Flood Hazard Area) and County LUO Section 22.52.110 (Drainage Plan Required). These County regulations require submittal of plans, cross-sections, and analysis demonstrating that the project would not limit the capacity of the floodway or increase flood heights. Pursuant to County LUO Section 22.52.150 (Standards), relevant requirements include:

- No construction or grading shall limit the capacity of the floodway or increase flood heights on existing structures unless the adverse effect of the increase is rectified to the satisfaction of the Director of Public Works – in no case shall flood heights be increased above that allowed under the Federal Flood Insurance Program.
- The storage or processing of materials that in time of flooding are buoyant, flammable, or explosive; that could be injurious to human, animal, or plant life; or that may unduly affect floodway capacity or unduly increase flood heights is not permitted. Storage of other material or equipment may be allowed if not subject to major damage by floods and if firmly anchored to prevent flotation, or if readily removable from the area within the time available after flood warning.
- Fills placed within watercourses shall have suitable protection against erosion during flooding.

- Retain natural drainage patterns and, when required, limit peak runoff to pre-development levels.

a) & f) Implementation of the project would include approximately 3.86 acres of site disturbance within a nearly level area. Disturbance of soils and use of equipment may result in the discharge of sediment, hydrocarbons, and other pollutants into San Luis Obispo Creek. Discharge of any pollutants (e.g. herbicides, pesticides, janitorial cleaning products, and toxic substances such as motor oil, gasoline, and anti-freeze) or heated water (e.g. from steam cleaning pathways) into a storm water system or directly into surface waters is illegal and subject to enforcement action by the RWQCB. These impacts would be mitigated through compliance with existing RWQCB, City, and County regulations, including the City's Storm Water Management Program, the 2014 LUCE, the City's Waterway Management Plan Drainage Design Manual (Floodplain Management), SWRCB Phase II Storm Water Regulations, County Land Use Ordinance Flood Hazard, Stormwater, and Drainage requirements, and Central Coast RWQCB Post-Construction Stormwater Regulations. The project would include the preparation and implementation of a SWPPP, and BMPs and PPMs are required to be incorporated into grading and construction plans for the short and long-term management and protection of water quality. Based on compliance with existing regulations, and incorporation of identified mitigation measures to protect water quality, the project would not violate any water quality standards or waste discharge requirements, and potential impacts would be less than significant.

Mitigation Measures: In addition to compliance with existing water quality and stormwater regulations, the City and County shall comply with previously identified mitigation measure **AG-4**, which requires that the design of the proposed project minimizes the quantity and rate of runoff off-site. The pathway shall be graded to convey runoff to away from agricultural crops and fields to reduce runoff onto adjacent agricultural lands. The City and County shall also implement mitigation measure **AG-5,** which requires that the City and County provide refuse bags and disposal cans for domestic animal waste at an accessible, serviceable point along the alignment.

Conclusion: Less than significant impact with mitigation.

b) The project would not result in any long-term demand for water supply, and the City/County will use recycled water during construction. Therefore, the project would not deplete available supply.

Conclusion: Less than significant impact.

c), d), e) The project would result in the creation of a new pathway, with approximately 1.03 acres of additional paving and improved shoulders. The project would not modify existing sheet flow drainage patterns onsite, and does not include any modifications within the bed and bank of San Luis Obispo Creek. A small crossing over a roadside ditch would span across onto South Higuera Street. As proposed, construction of the project would conform to existing grade. In addition, as noted above (refer to response to a & f and Section 6 Geology and Soils), the project would comply with existing plans and regulations for stormwater and floodwater management, including preparation and implementation of a SWPPP and erosion and sedimentation control plan, which would prevent any adverse drainage effects and pollution downstream stormwater, surface water, and groundwater. Therefore, the project would not result in any substantial change to drainage patterns, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on or off site.

Conclusion: Less than significant impact.

g) The proposed project is a pathway, and does not include any housing; therefore, no impact would occur.

h), i) The 100-year floodplain for San Luis Obispo Creek is located over the project site. Pursuant to the Waterway Management Plan Drainage Design Manual, the project site is located within Special Floodplain Management Zone #2. Any net increase in fill is only allowed pending compliance with the following relevant condition:

> "*A minimum setback of 15 m (50 ft) from the top of bank shall be adopted and maintained as a flood passage way. No new structures that could significantly block the downstream passage of floodwaters (including buildings, utility and trash closures, fences and landscaping walls) are permitted in this area. Public access trails are permitted, subject to additional CEQA review on a project-specific basis. The setback area shall be planted with native plants and*

maintained with an allowable Manning's roughness value of no lower than 0.050 and no higher than 0.075 as calculated using the procedures outlined in this Manual".

Based on the Waterway Management Plan, the project site is located adjacent to Reach 7 of San Luis Obispo Creek. This reach is identified as having less than 25-year flood flow capacity (i.e., flooding recurrence is less than 25 years). It is anticipated that flooding may occur during lesser (25-year) and larger (100-year) flood events. Floodwaters would continue to flood over the path and through proposed open fencing. Based on the existing condition of the site, stormwater management measures summarized above (see c, d, and e), compliance with existing regulations and plans including the *Waterway Management Plan* (Waterway Management Plan Drainage Design Manual, Floodplain Management Regulations), compliance with County LUO Sections 22.14.060 (Flood Hazard Area), 22.52.110 (Drainage Plan Required), and 22.52.150 (Standards), review and approval of grading and construction plans by City/County Public Works, the proposed development would not impede or redirect flood flows, or result in an increase in base flood elevation. Therefore, potential impacts would be less than significant.

During a flood event, use of the path may be restricted, depending on the depth of floodwaters. In order to mitigate potential flood hazards that may affect users of the pathway, signage would be installed warning users of potential flood risk during and following storm events. Based on implementation of this measure, potential flood hazards would be mitigated to less than significant.

Mitigation Measures: The City/County shall comply with the following measure to address public safety during a flood event:

HYD-1 The City/County shall install signage on the pathway including wording notifying and cautioning users of potential flooding hazards both during and following rain events.

Conclusion: Less than significant impact with mitigation.

j) The project site is not located in an area at risk of flooding as result of mudflow, tsunami, or seiche; therefore, no impact would occur.

Conclusion: Less than significant/no impact.

Based on review by the City and County, proposed project design, and compliance with existing regulations, no significant impacts would occur.

10. LAND USE AND PLANNING. Would the project:					
a) Physically divide an established community?					--X--
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 15, 18, 22, 24, 28, 29, 34			--X--	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?					--X--

Evaluation

a) The proposed project would not physically divide an established community, and would not result in a division of the agricultural fields. Therefore, no impact would occur.

Conclusion: No impact.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

b) The proposed project is subject to the City General Plan and Zoning Code, Land Use and Circulation Element (LUCE), the Airport Area Specific Plan, San Luis Obispo Creek Waterway Management Program, and Airport Land Use Plan. The project is also subject to the County General Plan and Land Use Ordinance. These plans include standards to protect aesthetic quality and scenic viewsheds, agricultural resources, air quality, biological resources, cultural resources, and public health and safety. Specific requirements or policies identified in these documents are discussed in specific resource sections. Based on project design and compliance with existing regulations and identified mitigation measures, the project would not be inconsistent with policies adopted for the purpose of avoiding or mitigating environmental effects.

Conclusion: Less than significant impact.

c) The project site is not located in an area subject to a habitat conservation plan or community conservation plan; therefore, no impact would occur.

Conclusion: No impact.

As proposed, the project is consistent with the City General Plan and Code, County General Plan and Code, and applicable regional plans.

11. MINERAL RESOURCES. Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	2				--X--
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	2				--X--

Evaluation

a), b) No known mineral resources are present within the project site; therefore implementation of the proposed pathway would not result in the loss of valuable mineral resources.

Conclusion: No impact.

12. NOISE. Would the project result in:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	2, 9, 28, 29		--X--	-	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	2, 9, 28, 29		--X--		
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	2, 9, 28, 29			--X--	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	2, 9, 28, 29		--X--		
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 expose people residing or working in the project area to excessive noise levels?	2, 9, 22			--X--	
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				--X--	

Evaluation

The project site is located proximate to Los Osos Valley Road and South Higuera Street. Based on the City's noise contour mapping, the project site is affected by transportation-related noise ranging from 60 to 70 decibels, depending on proximity to urban roadways. Based on the City Noise Element, the proposed use is not considered noise sensitive. The County Noise Element identifies outdoor sports and recreation as a noise sensitive land use. Transportation-related noise exposure up to 70 decibels is considered acceptable. The City Noise Control Ordinance prohibits: "Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of seven p.m. and seven a.m., or any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by exception issued by the community development department" (City Code Section 9.12.050). Section 22.10.120 of the County Land Use Ordinance (Noise Standards), identifies exceptions to noise standards including activities conducted in public parks, public playgrounds, and "Noise sources associated with construction, provided such activities do not take place before 7 a.m. or after 9 p.m. on any day except Saturday or Sunday, or before 8 a.m. or after 5 p.m. on Saturday or Sunday".

a), b), c), d) Construction activities may require the use of heavy equipment for grading, construction, and delivery of materials. Construction-related noise impacts would be temporary and localized; however, residences are located proximate to the site, and may be affected by construction-related noise generated by this project. This may be compounded by the construction of other projects in the area. City regulations limit the hours of construction to daytime hours (7:00 am – 7:00 pm), and County regulations limit the hours of construction to daytime hours (7:00 am – 9:00 pm weekdays, 8:00 am to 5:00 pm weekends). Implementation of a Construction Noise Reduction Plan would further reduce this short-term effect on the surrounding neighborhood. These measures include, but are not limited to, notifying the surrounding neighborhood of construction activities, minimizing the use of high impact equipment to the maximum extent feasible, providing noise attenuating shields, barriers, or enclosures around noise producing equipment, lining bins with sound absorbent material (as opposed to a hard metal bottom), provision of noise mufflers on appropriate equipment, and prohibition of the use of loud speakers or loud music/radio. Due to the short-term nature of construction activities and implementation of a noise reduction plan, construction related impacts would be less than significant.

Based on the location of the proposed project, future users would not be exposed to noise exceeding allowable thresholds. Exposure to noise generated by the adjacent agricultural uses would be temporary and short-term, due to the transient use of the pathway during operation. Operation of the pathway does not include any features or uses that would generate significant levels of noise above ambient conditions. Therefore, the project would not result in the exposure of persons to noise exceeding acceptable thresholds, and potential operational impacts would be less than significant.

Mitigation Measure: The City/County shall implement the following mitigation measure:

N-1 Prior to issuance of grading and construction permits, the Applicant shall submit a Construction Noise Reduction Plan including, but not limited to, the following measures (or comparable, equally effective measures):

a. All residences within 200 feet of the project site shall be notified of scheduled construction activity a minimum of 14 days prior to initiation of construction.
b. Minimize the use of impact devices, such as jackhammers, pavement breakers, and hoe rams.
c. Pneumatic impact tools and equipment used at the construction site shall have intake and exhaust mufflers recommended by the manufacturers thereof.
d. Provide impact noise producing equipment, i.e. jackhammers and pavement breaker(s), with noise attenuating shields, shrouds or portable barriers or enclosures, to reduce operating noise.
e. Line or cover hoppers, conveyor transfer points, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces).
f. Provide upgraded mufflers, acoustical lining or acoustical paneling for other noisy equipment, including internal combustion engines.
g. Use alternative procedures of construction and select a combination of techniques that generate the least overall noise and vibration. Such alternative procedures could include the following: use electric welders powered by remote generators; mix concrete at non-sensitive off-site locations, instead of on-site; and erect prefabricated structures instead of constructing buildings on-site.

i. Use construction equipment manufactured or modified to reduce noise and vibration emissions where feasible such as: electric instead of diesel-powered equipment; hydraulic tools instead of pneumatic tools; and electric saws instead of air- or gasoline-driven saws.
j. Turn off idling equipment when not in use for periods longer than 30 minutes.
k. Operate equipment so as to minimize banging, clattering, buzzing, and other annoying types of noises.
l. Provide enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the project site.
m. Minimize noise-intrusive impacts during most noise sensitive hours (7:00 PM to 7:00 AM).

Conclusion: Less than significant impact with mitigation.

e), f) The project site is located outside of the projected 50 decibel airport noise contour for the San Luis Obispo County Airport, as shown on Airport Land Use Plan Figure 1 (Airport Noise Contours). Therefore, based on the project location, the project would be consistent with ALUP noise policies, and would not be exposed to aircraft noise exceeding identified thresholds.

Conclusion: Less than significant impact.

Based on the proposed project location and design and incorporation of mitigation measures, no significant impact would occur.

13. POPULATION AND HOUSING. Would the project:					
a) Induce substantial 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)?	2			--X--	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	2				--X—
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	2				--X--

Evaluation

a) The proposed project is not anticipated to induce substantial population growth in the City or County as a result of new jobs resulting in relocation into the City, and would not include an extension of growth-inducing City infrastructure. Therefore, the project would not induce growth within or outside of the City.

Conclusion: Less than significant impact.

b), c) The proposed project would not require the removal or displacement of existing housing or persons. No impact would occur.

Conclusion: No impact.

The proposed project would not result in any changes to the City or County General Plan or City and County infrastructure that would increase population or affect the population/housing balance.

14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of 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:					
a) Fire protection?	2, 9, 34			--X--	
b) Police protection?	2, 9, 34			--X--	
c) Schools?	2, 9, 34			--X--	

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Parks?	2, 9, 34			--X--	
e) Other public facilities?	2, 9, 34			--X--	

Evaluation

The proposed project site is served by the City Police Department, City Fire Department, CalFire, County Sheriff, and California Highway Patrol. The project site is within the San Luis Coastal Unified School District. Solid waste is managed by Waste Connections, Inc. Several parks and public recreational facilities are located within the City.

a), b), c), d), e) The proposed development project is consistent with the City and County General Plans and Zoning Codes, and would not create significant impacts to local public services because it would not induce population growth. The project would provide an additional recreational resource for the public, which would not result in the demand for other public services. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

The proposed project would be adequately served by City, County, and State public services and not result in any new permanent impacts to public services.

15. RECREATION.

a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	2, 31			--X--	
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?	2, 31		--X--		

Evaluation

a) The proposed project consists of a connection link to the existing Bob Jones Pathway, which would connect to a future section of the pathway. The addition of this section of the pathway is anticipated to increase use to the existing section; however, this is the desired effect, and future maintenance and upkeep of the overall pathway is considered part of the project. Therefore, no significant impact would occur.

b) The proposed project consists of a recreational facility, and associated impacts on the environment are addressed within each appropriate resource section.

Conclusion: Less than significant impact with mitigation (as identified in other sections of this document).

The proposed project would provide an additional recreational opportunity within the City and County of San Luis Obispo; therefore, overall recreational impacts are beneficial.

16. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	2, 3, 4, 30, 31, 35, 36			--X--	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the	2, 3, 4, 30, 31, 35, 36			--X--	

	county congestion management agency for designated roads or highways?					
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	22			--X--	
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?				--X--	
e)	Result in inadequate emergency access?				--X--	
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	2, 3, 4, 31, 35, 36, 37				--X--

Evaluation

The proposed project would be accessed by existing (Los Osos Valley Road) and future connections (Buckley Road extension) to the Bob Jones Pathway, and would also be accessed from South Higuera Street. The project does not include a staging area, as this would be provided at the Octagon Barn, as a part of a previously approved project.

a), b) Construction of the project would require transport of materials and equipment to the site. Based on the size and length of the pathway connector, the number of construction trips is not expected to have any measureable effect on congestion in the area. The proposed project consists of a connecting segment of the Bob Jones Pathway, and does not include a trailhead staging area. Therefore, the project would not generate operational vehicular trips, and would not contribute to congestion or reductions in level of service on Los Osos Valley Road or South Higuera Street. While the project is anticipated to serve primarily recreational users, the project's contribution to a fully integrated pathway extending through the City and into the County has the potential to reduce vehicle trips, as persons may use the pathway for both occasional and regular commuting, in addition to recreation. Therefore, the project would not conflict with existing plans and policies in place and roadways would maintain adequate capacity and levels of service. The project is consistent with the County's Parks and Recreation Element, the City's Bicycle Transportation Plan, and San Luis Obispo County Bikeways Plan, by implementing the LOVR to Octagon Barn Segment and connecting to the County's Bob Jones Pathway. Based on the nature and location of the project, potential impacts would be less than significant.

Conclusion: Less than significant impact.

c) The project site is located with the County Airport Review Area, and is subject to the Airport Land Use Plan (ALUP, amended 2005). The project site is located within Airport Land Use Plan Aviation Safety Area S-2, and is located approximately 1.65 miles west of the San Luis Obispo County Airport active runways. Safety Area S-2 is defined as areas with aircraft operations at 501 to 1,000 feet above ground level. The ALUP provides development standards for Aviation Safety Compatibility. If projects are consistent with the ALUP, then it can be assured that potential impacts are less than significant. Based on ALUC Table 7, the maximum density of non-residential persons/acre is 150. Based on the nature of the project, it is unlikely that over 150 persons would be located within this pathway segment at one time, and no habitable structures are proposed. The project does not include any features that could interfere with aircraft, or impede an emergency landing. As proposed, the project would not be inconsistent with the ALUP, and would not result in a safety hazard related to airport operations. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

d) The proposed project would be accessed from South Higuera Street and connecting segments of the Bob Jones Pathway (at LOVR). Currently, pedestrians and cyclists share the roadway with vehicles, and the project would separate these uses and potentially result in a beneficial effect by increasing public safety. At the crossing location, site distance to the north is approximately 500 feet, and site distance to the south is approximately 280 feet. The introduction of a new crossing in this location may present a potential safety hazard until travelers become more accustomed to this feature.
Future development and transportation improvement projects proximate to the project alignment include the Octagon Barn

Center Project (approved by the County in 2012) and Buckley Road Extension (tied to build-out of the Avila Ranch Industrial Subdivision and Planned Development Project and identified in the City Land Use and Circulation Element). Pathway users would connect to the main Bob Jones Pathway via a planned new crosswalk and signal on South Higuera Street, which is proposed as part of the Buckley Road Extension Project. The Octagon Barn Center Project, located east of South Higuera Street, will include a Bob Jones Pathway Trailhead, restrooms, and 112 parking spaces; this project includes a southbound center left-turn lane on South Higuera Street into the Octagon Barn site.

The proposed project includes bike and pedestrian safety signage, in addition to a pedestrian hybrid beacon (HAWK) or similar user-actuated flashing beacon to improve visibility of the South Higuera Street crossing. The HAWK is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings. The beacon head consists of two red lenses above a single yellow lens. The beacon head is "dark" until the pedestrian desires to cross the street. At this point, the pedestrian will push an easy to reach button that activates the beacon. Automated pedestrian detectors may be used in conjunction with push buttons. After displaying brief flashing and steady yellow intervals, the device displays a steady red indication to drivers and a "WALK" indication to pedestrians, allowing them to cross a major roadway while traffic is stopped. After the pedestrian phase ends, the "WALK" indication changes to a flashing orange hand to notify pedestrians that their clearance time is ending. The hybrid beacon displays alternating flashing red lights to drivers while pedestrians finish their crossings before once again going dark at the conclusion of the cycle.

As the timing of the Avila Ranch project, and associated roadway improvements including a traffic signal, is currently uncertain, the City/County proposes to implement the safety signage and crosswalk and HAWK signalization upon implementation of the proposed project to ensure safety measures associated with the crossing of South Higuera Street is provided prior to operation of the pathway. Based on implementation of these safety measures, which are incorporated into the project description, potential impacts related to creation of a potentially hazardous feature would be less than significant.

Potential agricultural land use incompatibilities are addressed in Section 2 Agricultural Resources, and no substantial safety risk was identified. Therefore, potential impacts would be less than significant.

e) Emergency access is adequate, and emergency responders can access the project from South Higuera Street, and the pathway itself. The project does not include any features that would impede emergency response. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

f) The City's Bicycle Transportation Plan and San Luis Obispo Council of Government's 2014 Regional Transportation Plan-Preliminary Sustainable Communities Strategy include a Class I pathway connection between Los Osos Valley Road and South Higuera Street. One of the themes of the City's General Plan is to maintain a network of paths, sidewalks, and bikeways that connect neighborhoods with major activity centers and with County pedestrian and bicycle facilities. The County's Parks and Recreation Element and County Bikeways Plan identify the proposed Bob Jones Pathway, stating it is to connect the City of San Luis Obispo to the community of Avila Beach in the vicinity of San Luis Obispo Creek. The City's Bicycle Transportation Plan and Bob Jones City-to-Sea Trail Preliminary Alignment Plan, as well as the County's 2011 Public Improvement Standards include pathway and on-street bikeway design standards applicable to the Bob Jones Pathway. The project is consistent with these plans by implementing the Los Osos Valley Road to Octagon Barn Segment. Therefore, no impact would occur.

Conclusion: No impact.

Implementation of the proposed project would create an important connection in the Bob Jones Pathway, achieving goals identified in City and County General Plan documents. Generation of construction trips would be temporary, and would not significantly increase congestion on Los Osos Valley Road or South Higuera Street. The project would not increase vehicular congestion or reduce level of service on public roadways. The project incorporates safety signage and beacons at the proposed crosswalk across South Higuera Street. Therefore, potential transportation-related impacts would be less than significant.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				--X--	
b) Require or result in the construction or expansion of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	25			--X--	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				--X--	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	25			--X--	
e) 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?				--X--	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	32			--X--	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				--X--	

Evaluation

The proposed project does not require use of public utilities, including water, wastewater collection and treatment, or energy. Temporary irrigation to establish landscaping, groundcover, and biological resource mitigation area(s) would be provided by the City-treated recycled water. Solid waste is managed by Waste Connections, Inc. Several parks and public recreational facilities are located within the City, and the project would supplement these recreational uses for both City and County residents, in addition to tourists.

a) The proposed project would not include an onsite septic system. Therefore, no impact would occur.

Conclusion: No impact.

b), d), e) Implementation of the proposed project is limited to a pathway segment with no ancillary elements that require long-term use of water (and no generation of wastewater). In turn, this would not require or result in the construction or expansion of water or wastewater treatment facilities or storm water drainage facilities. Water demand generated by the project would be limited to irrigation required for landscaping, groundcover, and biological resources mitigation site(s), which may be provided by City-treated recycled water. This water would likely be hauled to the site, and would not require additional infrastructure for the temporary use. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

f), g) Construction and operation of the proposed project would generate solid waste. It is anticipated that a majority of waste would be disposed at the Cold Canyon Landfill. As of 2009, the Cold Canyon Landfill operated at 32 percent of its permitted daily capacity, and as of June 2010, the landfill had a remaining capacity of approximately 1.83 million cubic yards. In November 2012, the County Board of Supervisors approved a proposal to expand the landfill's disposal-area footprint by approximately 46 acres (additional 13.1 million cubic yards) (San Luis Obispo County 2012). Therefore, existing landfills would have the capacity to serve the project.

Conclusion: Less than significant impact.

Issues, Discussion and Supporting Information Sources ER # 30-13 (Bob Jones Pathway Octagon Barn Connection)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Based on the nature of the proposed project, it would not result in any significant impacts to public utilities or service systems.					
18. MANDATORY FINDINGS OF SIGNIFICANCE.					
a) Does the project have the potential to 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, 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?	1, 2, 3, 4, 6, 30		--X-		
Please refer to Section 4 Biological Resources, which includes an assessment of the project's potential effects on special status fish and wildlife species and their habitat. Required mitigation measures are consistent with the Mitigation Monitoring and Reporting Program adopted as part of the certification of the Bob Jones Pathway Final Environmental Impact Report and approval of the project by the County of San Luis Obispo. Based on the project's location, existing condition, and implementation of mitigation measures, the project would not have the potential to significantly degrade the quality of the environment, or substantially reduce habitat or species populations.					
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 the past projects, the effects of other current projects, and the effects of probable future projects)?	2, 3, 30		--X--		
Based on the location of the project, existing condition of the project site, and implementation of mitigation measures, the project would not result in any impacts that are cumulatively considerable.					
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			--X--		
Please refer to Sections 3 (Air Quality), 8 (Hazards and Hazardous Materials), 12 (Noise), and 16 (Transportation/Traffic). Based on the location of the proposed project and implementation of mitigation measures, the project would not have a substantially adverse direct or indirect effect on the public.					

19. EARLIER ANALYSES.

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:

a) Earlier analysis used. Identify earlier analyses and state where they are available for review.

N/A

b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

N/A

c) Mitigation measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.

20. SOURCE REFERENCES.

1.	City of SLO Conservation & Open Space Element, 2006.
2.	City of SLO Land Use and Circulation Element and Final EIR, last revised December 2014.
3.	County of San Luis Obispo Bob Jones Pathway Final EIR SCH#2010031121, January 2015
4.	City of San Luis Obispo Bob Jones Pathway Octagon Barn Connection Study, November 2013
5.	County of San Luis Obispo Agriculture Element, May 2010
6.	County of San Luis Obispo Conservation and Open Space Element, May 2010
7.	California Department of Conservation Farmland Mapping and Monitoring Program, July 2013
8.	Natural Resources Conservation Service Web Soil Survey, Accessed November 2, 2015
9.	San Luis Obispo County Code, Title 22 Land Use Ordinance, July 2014
10.	Clean Air Plan for San Luis Obispo County, Air Pollution Control District, 2001.
11.	CEQA Air Quality Handbook, Air Pollution Control District, 2012.
12.	City of San Luis Obispo Zoning Regulations, March 2015
13.	Bob Jones Pathway Connector Project Phase 1 Cultural Resources Survey, SWCA, November 2015
14.	City of San Luis Obispo Archaeological Resource Preservation Program Guidelines, October 2009
15.	City of SLO General Plan Safety Element, July 2000
16.	California Building Code, 2013
17.	San Luis Obispo Quadrangle Map, prepared by the State Geologist in compliance with the Alquist-Priolo Earthquake Fault Zoning Act, effective January 1, 1990
18.	City of SLO 2012 Climate Action Plan, August 2012
19.	CALEPA Climate Action Team Biennial Report, April 2010
20.	California Department of Toxic Substances Control, Envirostor Accessed November 2, 2015
21.	State Water Resources Control Board, Geotracker Accessed November 2, 2015
22.	County Airport Land Use Plan dated May 18, 2005.
23.	City of SLO Airport Compatible Open Space Plan, April 2005
24.	City of SLO Local Hazard Mitigation Plan
25.	City of SLO 2010 Urban Water Management Plan, 2011
26.	Waterway Management Plan, City and County of San Luis Obispo, 2003
27.	Federal Emergency Management Agency, FIRM, November 16, 2012
28.	City of San Luis Obispo Noise Element, 1996
29.	County of San Luis Obispo Noise Element, May 1992
30.	Los Osos Valley Road Interchange in the City of San Luis Obispo on US-101 IS/MND August 2011
31.	City of San Luis Obispo Bicycle Transportation Plan, November 5, 2013
32.	Cold Canyon Landfill Final EIR, May 2012
33.	County of San Luis Obispo Building and Construction Ordinance, Title 19, January 2014
34.	County of San Luis Obispo Land Use and Circulation Elements (Part II), The Area Plans, February 2014
35.	County of San Luis Obispo Parks and Recreation Element, December 2006
36.	San Luis Obispo County Bikeways Plan 2010 Update, November 2010
37.	2014 Regional Transportation Plan/Sustainable Communities Strategy Connecting Communities, April 2015

Attachments:

1. Project Location Map
2. Proposed Project Site Plan
3. Habitat & Flood Zone Map

REQUIRED MITIGATION AND MONITORING PROGRAMS

Aesthetics

AES-1 Prior to construction, grading and construction plans shall be prepared showing the following elements and verification measures:

a. Grading and landform alterations shall be minimized to the maximum extent feasible, and shall blend with the natural topography by following existing contours where feasible.
b. Fences shall consist of 48-inch T-post wire and 36-inch split rail.
c. The bridge crossing at the pathway approach to South Higuera Street shall be designed to be compatible with the existing agricultural visual setting, and shall include the use of wood (or wood-simulated) or painted (dark brown or dark green, non-reflective, muted color) guard rails. Weather-resistant, durable materials shall be used to minimize required maintenance.
b. Appropriate non-invasive native plant materials (i.e., ground cover for pathway shoulders, shrubs and trees for areas where these plants have been removed or trimmed), as identified by a qualified individual, and as agreed to by the agricultural landowner, that will cover graded areas and cut and fill slopes and that are compatible with adjacent vegetation to minimize visual impacts.
c. Revegetation of disturbed areas shall occur concurrent with construction.
d. The City/County shall be responsible for mitigation monitoring to ensure mitigation planting is installed and maintained for five years to ensure establishment.

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

Agricultural Resources

AG-1 Prior to commencing construction, grading and construction plans shall be prepared showing compliance with the following measures:

a. During grading activities, contractor shall set aside the top six inches of topsoil for incorporation into the adjacent agricultural field by the agricultural landowner.
b. All groundcover, soil stabilizers, and erosion control measures shall avoid the use of invasive plant and seed material.

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

AG-2 Prior to commencing operation of the pathway, City and County of San Luis Obispo shall provide a payment of $6,000 per acre to offset the permanent impact of 1.3 acres of prime farmland at a minimum 1:1 ratio, pursuant to City LUCE Policy 1.8.2 and City COSE Policy 8.6.3(C). These funds will be held in a designated fund with the City of San Luis Obispo for future acquisition of land or land interests of equal area and of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area. The City/County shall identify an appropriate site prior to the construction phase of the project.

Monitoring Program: Compliance shall be verified by the City/County and documented for the public record prior to implementation of the project.

AG-3 Prior to commencing construction, the City and County of San Luis Obispo, in coordination with property owners and the San Luis Obispo County Department of Agriculture, shall develop and implement a Farmland Conflict Reduction Plan. The Farmland Conflict Reduction Plan shall include, at a minimum: methods for minimizing trespassing and disturbance by trail users; procedures for minimizing pesticide exposure (notification, pathway closure, etc.); and establishment of potential temporary pathway closure procedures. The Farmland Conflict Reduction shall also include and comply with the following measures:

a. Examples of the signage, striping, and fencing required. Signage shall describe the importance of the local agricultural lands and educate the public/users how to respect the surrounding important resources and reduce conflicts, including, but not limited to, the following: staying on designated trails; minimizing litter/waste; and prohibiting picking of crops.
b. Signage shall be located at the northern and southern terminuses of the alignment, and all signage shall be installed prior to public use of the trail.
c. Pathway alignment and intersections shall be designed to minimize conflicts with agricultural operations through use of deterring devices such as fencing, striping, signage, bollards, and paving. Pavement and intersection development standards shall be identified and accommodate use by agricultural machinery and vehicles at all pathway/agricultural road intersection locations in order to minimize maintenance requirements where the pathway crosses agricultural roads. All methods of reducing conflict shall be demonstrated on final construction documents.
d. Circumstances that require temporary pathway closure shall be clearly defined. Such circumstances may include routine maintenance, agricultural spraying, or potential and/or actual flood conditions. The timing of and average duration of routine temporary closures shall be clearly defined.
e. Every effort shall be made to schedule temporary pathway closures during non-peak pathway usage periods, which are typically weekends, holidays, and commute hours, as established with agricultural operator. Any temporary closures shall be clearly posted at the trailheads, parking areas, and point of closure. The notification shall identify the reason for the closure, time and date of closure, and duration of closure.
f. Signage shall be posted at least 24 hours prior to closure and removed immediately upon the identified duration or being cleared for re-opening by the City and County of San Luis Obispo.
g. Prior to issuance of grading permit and initiation of grading activities, the City and County of San Luis Obispo shall ensure that final construction documents include the requirements of the Farmland Conflict Reduction Plan

Monitoring Program: Preparation of the Farmland Conflict Reduction Plan is required prior to construction. The approved Plan shall be implemented during construction and for the life of the project. Compliance shall be verified by the City/County during regular inspections.

AG-4 Prior to commencing construction, the City and County of San Luis Obispo shall ensure proposed grading, drainage, and construction plans, stormwater management plan, Storm Water Pollution Prevention Plan, and sedimentation and erosion control plan include best management practices that would ensure that the proposed project minimizes the quantity and rate of runoff off-site. The pathway shall be graded to convey runoff away from agricultural crops and fields to reduce runoff onto adjacent agricultural lands.

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

AG-5 Prior to operation of the pathway, and throughout the life of the project, the City and County of San Luis Obispo shall provide and dispose of refuse bags and disposal cans for domestic animal waste at an accessible, serviceable point along the alignment.

Monitoring Program: Compliance shall be verified by the City/County during regular inspections.

Air Quality

AQ-1 Fugitive Dust Control Measures. The proposed project shall implement the following dust control measures so as to reduce PM10 emissions in accordance with SLOAPCD requirements.

a. Reduce the amount of the disturbed area where possible;
b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (nonpotable) water should be used whenever possible;
c. All dirt stock pile areas should be sprayed daily as needed;

d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;
e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible after grading unless seeding or soil binders are used;
h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;
j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible;
l. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.

Monitoring Program: These conditions shall be noted on all project grading and building plans. Public Works Inspectors shall conduct field monitoring.

AQ-2 Construction Equipment. The proposed project shall implement the following Standard Control Measures for construction equipment as to reduce air emissions in accordance with SLOAPCD requirements.
a. Maintain all construction equipment in proper tune according to manufacturer's specifications;
b. Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for sue off-road);
c. Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
d. Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
e. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures may be eligible by proving alternative compliance;
f. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
g. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
h. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
i. Electrify equipment when feasible;
j. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
k. Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.
l. All of these mitigation measures shall be shown on grading and building plans, and confirmed by the contractor or builder in consultation with the City and County The contractor or builder shall be responsible for ensuring and demonstrating compliance during construction.

Monitoring Program: These conditions shall be noted on all project grading and building plans. Public Works Inspectors shall conduct field monitoring.

AQ-3 Developmental Burning. APCD regulations prohibit developmental burning of vegetative material within San Luis Obispo County; therefore, burning of vegetative material shall not occur.

Monitoring Program: These conditions shall be noted on all project grading and building plans. The Public Works Inspectors shall conduct field monitoring.

AQ-4 Permits. Prior to construction, the contractor or builder shall obtain all required permits from SLOAPCD, and shall provide documentation to the City/County. Portable equipment and engines 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the ARB) or an Air District permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive:

a. Power screens, conveyors, diesel engines, and/or crushers;
b. Portable generators and equipment with engines that are 50 hp or greater;
c. Internal combustion engines;
d. Unconfined abrasive blasting operations;
e. Concrete batch plants;
f. Rock and pavement crushing;
g. Tub grinders; and,
h. Trommel screens.

Monitoring Program: These conditions shall be noted on all project grading and building plans. The City/County shall obtain any required permits or exemptions issued by APCD.

AQ-5 Naturally Occurring Asbestos. Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities a geologic evaluation shall be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District. If NOA is found at the site, the contractor or builder must comply with all requirements outlined in the Asbestos ATCM. This may include development and implementation of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval and verification by the APCD. More information on NOA can be found at http://www.slocleanair.org/business/asbestos.asp.

Monitoring Program: These conditions shall be noted on all project grading and building plans. The City/County shall obtain any required permits or exemptions issued by APCD.

Biological Resources

BR-1 Prior to commencement of construction the City/County shall retain a qualified biological monitor(s) to ensure compliance with avoidance and minimization measures. Monitoring will occur throughout the length of construction or as directed by the regulatory agencies. Full-time monitoring will occur during initial grading, vegetation removal, and erosion control installation. Monitoring may be reduced to part-time once construction activities are under way and the potential for additional impacts is reduced. Monitoring reports shall be submitted to the City/County, or its designee, on a quarterly basis or as specified by specific mitigation measures.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify compliance, including documentation of retained monitor and receipt of monitoring reports.

BR-2 During construction, the biological monitor(s) will ensure that the spread or introduction of invasive exotic plant species will be avoided to the maximum extent possible. When practicable, invasive exotic plants on the project site will be removed and properly disposed.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-3 Prior to commencement of construction, the City/County, or its designee, shall clearly flag or fence project site will be so that the contractor is aware of the limits of allowable site access and disturbance. Areas within the designated project site that do not require regular access will be clearly flagged as off-limit areas to avoid/discourage unnecessary damage to sensitive habitats or existing vegetation within the project site.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-4 Prior to commencement of construction, the City/County or its designee shall prepare a Hazardous Materials (HAZMAT) Response Plan to allow for a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. During construction, all project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on site at all times during construction. The HAZMAT Response Plan shall allow the cleaning and refueling of equipment and vehicles occur only within a designated staging area, which shall be located at least 60 feet from wetlands, other waters, or other aquatic areas. This staging area will conform to best management practices (BMPs) applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles will be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including preparation of required documents, implementation of the approved Plan, and receipt and approval of biological monitoring reports documenting compliance.

BR-5 Prior to commencement of construction, the City/County shall have a qualified arborist prepare a vegetation management plan that minimizes the trimming of trees to the extent feasible. To avoid the potential for accidental removal or unnecessary trimming of trees, trees to be trimmed shall be clearly flagged. Un-flagged trees shall not be removed or trimmed. All trimming shall be conducted by a qualified arborist.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department, City Arborist, and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including preparation of required documents, implementation of the approved Plan, and receipt and approval of biological monitoring reports documenting compliance.

BR-6 Prior to commencement of construction, the City/County shall prepare and incorporate into final construction documents an erosion control plan and stormwater pollution prevention plan (SWPPP) for the project. Provisions of these plans shall be implemented during and after construction as necessary to avoid and minimize erosion and stormwater pollution in and near the work area. The SWPPP shall include erosion control measures to be implemented during and after project implementation. Best management practices including, but not limited to, temporary construction fencing delineating the boundary of the 30 to 60-foot wide construction corridor, silt fencing, fiber rolls, and barriers (e.g., hay bales) will be installed between the project site and adjacent wetlands and other waters. No synthetic plastic mesh products shall be used in any erosion control materials. At a minimum, best management practices shall be checked and maintained by the contractor on a daily basis throughout the construction period, and the biological monitor shall check best management practices periodically, in addition to before and after rain events to ensure compliance. The contractor shall also apply adequate dust control techniques, such as site watering and use of soil stabilizers, during construction. The City/County or its designee shall ensure compliance with the SWPPP throughout the duration of the proposed project.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including preparation of required documents, implementation of the approved Plan, and receipt and approval of biological monitoring reports documenting compliance.

BR-7 Prior to commencement of construction, the City/County shall prepare a construction management plan that identifies the rules and requirements of the job site. The construction management plan shall reference other applicable plans (i.e., SWPPP, HAZMAT Response Plan, employee training program, etc.), identify construction hours, contact names and numbers, and other specific management requirements, including, but not limited to, the following:

a. During construction, trash will be contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas. All vegetation removed from the construction site shall be taken to a certified landfill to prevent the spread of invasive species. If soil from weedy areas (such as areas with poison hemlock or other invasive exotic plant species) must be removed off site, the top 6 inches containing the seed layer in areas with weedy species shall be disposed of at a certified landfill. Prior to removal, the City/County will coordinate with the agricultural landowner to ensure the soil does not consist of desired topsoil for agricultural crops.
b. During construction, no pets will be allowed on the construction site.
c. All other applicable biological measures referenced in this Initial Study that relate to field practices during construction.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department shall verify implementation of these measures, including preparation of required documents, implementation of the approved Plan, and receipt and approval of biological monitoring reports documenting compliance.

BR-8 Prior to commencement of construction, City/County Public Works Department shall have a qualified biologist prepare and conduct a worker environmental training program. The environmental training program shall include descriptions of all special-status species with the potential to occur within the project area, their ecology, legal status, the need for conservation of the species, and what to do if one is observed. The environmental training program shall be subject to review and approval by the City /County or assigned designee. All construction personnel conducting work within habitat that potentially supports these species shall participate in the training program conducted by a qualified biologist. Evidence of participation in the environmental training program shall be submitted to the City/County on a quarterly basis.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-9 Prior to commencement of construction, the City/County shall have a qualified biologist conduct pre-construction surveys and regular surveys during construction, as determined by the qualified biologist, for Coast Range newts, southwestern pond turtles, and two-striped garter snakes and any other California Special Concern species or other special-status species. The City/County of San Luis Obispo shall obtain a letter of permission from the California Department of Fish and Wildlife (CDFW) to relocate identified California Special Concern species from work areas encountered during construction as necessary. A qualified biologist shall capture and relocate any California Special Concern species or other special-status species (if present) to suitable habitat outside of the area of impact. Observations of California Special Concern species or other special-status species shall be documented on California Natural Diversity Database forms and submitted to CDFW and the City /County, or its designee, upon project completion.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-10 Prior to commencement of construction, the City/County shall implement the following avoidance and minimization measures for California red-legged frog:

a. Prior to ground disturbance, a USFWS-approved biologist shall survey the project area no more than 48 hours before the onset of work activities. If any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move them from the site before work activities begin. The USFWS-approved biologist shall

relocate the California red-legged frogs the shortest distance possible to a location that contains suitable habitat and will not be affected by the activities associated with the project. The USFWS-approved biologist shall maintain detailed records of any individuals that are moved (e.g., size, coloration, any distinguishing features, photographs [digital preferred]) to assist him or her in determining whether translocated animals are returning to the point of capture.

b. Prior to commencement of grading and construction, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and its habitat, the specific measures that are being implemented to conserve the California red-legged frog for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.
c. A USFWS-approved biologist shall be present at the work site until all California red-legged frogs have been removed (as applicable), workers have been instructed, and disturbance of the upland habitat has been completed. After this time, the City/County shall designate a person to monitor on-site compliance with all minimization measures as required under the Habitat Mitigation and Monitoring Plan.
d. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 60 feet (18 meters) from the riparian habitat or water bodies and not in a location from which a spill would drain directly toward aquatic habitat. The monitor shall ensure contamination of habitat does not occur during such operations.
e. Disturbed areas shall be revegetated with an assemblage of native, non-invasive plant species. Locally collected plant materials shall be used to the extent practicable. Invasive, exotic plants shall be controlled to the maximum extent practicable. This measure shall be implemented in all areas disturbed by activities associated with the project, unless that it is not feasible or modification of original contours would not benefit the California red-legged frog.
f. The total area of activity (i.e., construction corridor, staging area, access route) shall be limited to the minimum necessary, and delineated with flagging and/or temporary construction fencing.
g. To the maximum extent feasible, work shall be scheduled for the times of the year when impacts to the California red-legged frog would be minimal (i.e. avoid the breeding season, November through May, if possible).
h. Best management practices (BMPs) shall be implemented to control sedimentation during and after project implementation.
i. If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 0.2 inch (5 mm) to prevent California red-legged frogs from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction.
j. Water shall not be impounded in a manner that may attract California red-legged frog.
k. The use of herbicides is prohibited as the primary method to control invasive, exotic plants within the pathway alignment.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-11 The City and County shall obtain all necessary permits or authorizations from Federal and State Agencies, including the US Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, or documentation that such permit and authorizations are not warranted, based on the final design of the project. Pursuant to Section 7 of the Endangered Species Act, formal consultation shall be initiated with the California Department of Fish and Wildlife, US Fish and Wildlife Service and/or the National Marine Fisheries Service for impacts to listed species (i.e. south-central California coast steelhead ESU).

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify compliance with federal, state, and local permitting requirements, as applicable, based on the final design of the project.

BR-12 If any special-status species are observed in or near work areas during monitoring or construction, the City/County shall have a qualified biologist map, establish and mark off an exclusion zone, and avoid these species until the

appropriate regulatory agencies (e.g., California Department of Transportation, US Fish and Wildlife Service, and California Department of Fish and Wildlife) are consulted for further mitigation options. Additional measures may include temporary halting of work, avoidance, relocation, or other measures as identified by the resource agencies, depending upon the specific species and its distribution.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-13 Prior to issuance of any permit, the City/County shall document on all final construction documents that vegetation trimming shall occur outside of the nesting season (as determined by qualified biologist), wherever possible, to minimize birds nesting within areas of disturbance during or just prior to construction. These timing requirements shall be confirmed by the City Natural Resources Manager/ County Environmental Coordinator or designee.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-14 If construction activities are proposed to occur during the typical nesting season (February 15 to August 31) within 200 feet (60 meters) of potential nesting habitat the City/County shall have a qualified biologist conduct pre-construction surveys for nesting birds (including swallows) in potential nesting habitat. Pre-construction surveys shall be conducted at least two weeks prior to construction and periodically during the construction period to determine presence/absence of nesting birds within the project area. The USFWS and/or the CDFW shall be contacted if any listed bird species are observed during surveys and consulted for additional guidance if nesting birds are observed within or near the boundaries of the project site. Nests, eggs, or young of birds covered by the Migratory Bird Treaty Act and the California Fish and Game Code shall not be moved or disturbed until the end of the nesting season or until young fledge, whichever is later, nor shall adult birds be killed, injured, or harassed at any time. Work activities shall be avoided within 100 feet (30 meters) of active bird nests and 200 feet (60 meters) of active raptor nests until young birds have fledged and left the nest. Readily visible exclusion zones shall be established by a qualified biologist in areas where active nests must be avoided. Results of the pre-construction surveys shall be submitted to the City/County, or its designee, upon completion and prior to construction.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of biological monitoring reports documenting compliance.

BR-15 Prior to commencement of construction, the City/County or its designee shall prepare a comprehensive Habitat Mitigation and Monitoring Plan (HMMP), for review and approval by the City /County, that specifies final mitigation requirements for impacts to vegetation and natural habitats including the requirements of permits and consultation with the resource agencies (as applicable based on the final design). The HMMP shall identify specific mitigation sites based on the specific mitigation acreage required by regulatory agencies during the permitting process and as identified below. The HMMP shall be consistent with federal and state regulatory requirements and reflect any regulatory permit conditions, as required. The City/County or its designee shall ensure implementation of mitigation requirements of the HMMP during construction and immediately following project completion. Measures identified in the final HMMP shall include at a minimum the following:

a. On-site mitigation at the following minimum ratios, unless determined otherwise by a regulatory agency, which shall ensure no net loss of habitat:
b. On-site mitigation (within areas in or near the San Luis Obispo Creek watershed) for permanent impacts to jurisdictional areas would be implemented at a minimum 2:1 ratio;
c. Off-site mitigation for permanent impacts to jurisdictional areas would be implemented at a 3:1 ratio; and
d. On-site and/or off-site mitigation for temporary impacts to jurisdictional areas would be implemented at a 1:1 ratio.
e. Any loss of southern California black walnut trees and coast live oak trees shall be mitigated at a 4:1 restoration ratio for every walnut or oak tree removed and at a 2:1 ratio for every walnut or oak tree trimmed or otherwise

impacted but not removed. If more than 25 percent of a walnut or oak tree must be trimmed, it shall be mitigated at a 4:1 restoration ratio.

f. Implementation of the restoration and mitigation activities will be conducted or overseen by an agency-approved restoration specialist. The restoration specialist will oversee site preparation and plant installation to ensure conformity with the approved HMMP. Restoration and mitigation activities shall include, but are not limited to, plant salvage, site preparation and planting, installation of irrigation, and preparation and implementation of maintenance and monitoring plans.
g. The maintenance plan shall address watering requirements, weed control, herbicide use, vandalism, and remedial plantings and fertilizing. The monitoring plan shall identify a monitoring schedule, performance goals, other attributes to monitor, and reporting requirements.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City/County Public Works Department and Natural Resources Manager/Environmental Coordinator shall verify implementation of these measures, including receipt and approval of the HMMP, and subsequent monitoring reports documenting compliance.

Cultural Resources

CR-1 Prior to commencement of construction, final grading and construction plans shall delineate the extent of the Stornetta Bridge and a minimum 50-foot buffer, and shall prohibit the use of construction equipment and storage of materials on the bridge and within the 50-foot buffer area. The 50-foot buffer shall be delineated in the field using temporary construction fencing and/or flagging.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The County Public Works Department shall verify compliance.

CR-2 Prior to commencement of construction, the City/County shall ensure the preparation of a Cultural Resources Monitoring Plan, prepared by a qualified archaeologist. The intent of this Plan is to monitor all earth-disturbing activities. The Monitoring Plan shall include at a minimum:

a. List of personnel involved in the monitoring activities;
b. Inclusion of involvement of the Native American community, as appropriate;
c. Description of how the monitoring shall occur;
d. Description of frequency of monitoring (e.g., full-time, part time, spot checking);
e. Description of what resources are expected to be encountered;
f. Description of circumstances that would result in the halting of work at the project site (e.g., What is considered "significant" archaeological resources?);
g. Description of procedures for halting work on the site and notification procedures; and
h. Description of monitoring reporting procedures.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City/County Public Works Department shall verify compliance, including preparation and implementation of the Plan, and review and approval of cultural resources monitoring reports documenting compliance with required mitigation measures.

CR-3 If, during the course of constructing and implementing the proposed project, archaeological, paleontological, or cultural resources (i.e., prehistoric sites, historic sites, or isolated artifacts and features) are discovered, the contractor shall halt all ground disturbing activities immediately within 50 feet of the discovery, the City/County shall be notified, and a professional archaeologist, architectural historian, or paleontologist (depending on the nature of the finding) shall be retained to determine the significance of the discovery. The City/County shall consider mitigation recommendations presented by the professional, and the City/County shall consult and agree upon implementation of a measure(s) that they deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The City/County shall be required to implement any mitigation necessary for the protection of archaeological, paleontological, and cultural resources.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City/County Public Works Department shall verify compliance, including review and approval of cultural resources monitoring reports documenting compliance with required mitigation measures.

CR-4 In the event of human burial discovery, no further disturbance shall occur within 100 feet of the finding until the County of San Luis Obispo (County) Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission within 24 hours, which will determine and notify a Most Likely Descendant (MLD). The City/County shall allow the MLD to complete an inspection of the site (typically within 48 hours of notification) and shall comply with MLD recommendations, which may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City/County Public Works Department shall verify compliance, including review and approval of cultural resources monitoring reports documenting compliance with required mitigation measures.

CR-5 Prior to development of Native American interpretive materials or educational signage associated with the project, the City/County shall coordinate with local Native American tribal representatives regarding appropriate language and educational information to be included in the materials or on the signage.

Monitoring Program: The City/County Public Works Department shall verify compliance.

Hydrology

HYD-1 The City/County shall install signage on the pathway including wording notifying and cautioning users of potential flooding hazards both during and following rain events.

Monitoring Program: The City/County Public Works Department shall verify compliance.

Noise

N-1 Prior to issuance of grading and construction permits, the Applicant shall submit a Construction Noise Reduction Plan including, but not limited to, the following measures (or comparable, equally effective measures):

a. All residences within 200 feet of the project site shall be notified of scheduled construction activity a minimum of 14 days prior to initiation of construction.
b. Minimize the use of impact devices, such as jackhammers, pavement breakers, and hoe rams.
c. Pneumatic impact tools and equipment used at the construction site shall have intake and exhaust mufflers recommended by the manufacturers thereof.
d. Provide impact noise producing equipment, i.e. jackhammers and pavement breaker(s), with noise attenuating shields, shrouds or portable barriers or enclosures, to reduce operating noise.
e. Line or cover hoppers, conveyor transfer points, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces).
f. Provide upgraded mufflers, acoustical lining or acoustical paneling for other noisy equipment, including internal combustion engines.
g. Use alternative procedures of construction and select a combination of techniques that generate the least overall noise and vibration. Such alternative procedures could include the following: use electric welders powered by remote generators; mix concrete at non-sensitive off-site locations, instead of on-site; and erect prefabricated structures instead of constructing buildings on-site.
i. Use construction equipment manufactured or modified to reduce noise and vibration emissions where feasible such as: electric instead of diesel-powered equipment; hydraulic tools instead of pneumatic tools; and electric saws instead of air- or gasoline-driven saws.
j. Turn off idling equipment when not in use for periods longer than 30 minutes.
k. Operate equipment so as to minimize banging, clattering, buzzing, and other annoying types of noises.

l. Provide enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the project site.
m. Minimize noise-intrusive impacts during most noise sensitive hours (7:00 PM to 7:00 AM).

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City/County Public Works Department shall verify compliance.

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